



# Planning Statement

**Land East of Hayes Lane, Slinfold**

**The Incidental Land Company Ltd (TILCo)**

Prepared by:

**SLR Consulting Limited**

Mountbatten House, 1 Grosvenor Square,  
Southampton SO15 2JU

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## Basis of Report

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## Table of Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>The Site and Surroundings</b>	<b>2</b>
<b>3.0</b>	<b>Planning History</b>	<b>6</b>
<b>4.0</b>	<b>Statement of Community Involvement</b>	<b>7</b>
<b>5.0</b>	<b>The Proposed Development</b>	<b>8</b>
<b>6.0</b>	<b>Relevant Planning Policy</b>	<b>10</b>
<b>7.0</b>	<b>Summary of Key Planning Consideration</b>	<b>17</b>
<b>8.0</b>	<b>Summary and Planning Balance</b>	<b>29</b>

## Tables in Text

Table 1: Planning History .....	6
Table 2: Housing Mix .....	8

## Figures in Text

Figure 1: Extract from Site Layout Plan .....	1
Figure 2: Site Location Plan .....	4



## 1.0 Introduction

1.1 SLR Consulting has been instructed by the applicant The Incidental Land Company Ltd (TILCo) to prepare a Planning Statement in support of the submission of an Outline planning application to Horsham District Council (HDC). The Outline proposal is for a mixed development of 38no. new homes, including 13no. on-site affordable housing units, vehicular access and parking, landscaping, play provision, and improvements and a diversion to Public Footpath No.3782 on Land to the East of Hayes Lane in Slinfold ('the site').

1.2 The proposal as described above is being submitted for approval in Outline form with all detailed matters to be reserved for subsequent approval, except details of vehicular access and site layout which are proposed in full. The proposal is shown below in an extract from the submitted Site Layout Plan:

**Figure 1: Extract from Site Layout Plan**



1.3 This Planning Statement presents an analysis of the application site and surrounding area and sets out the relevant planning history and planning policy context. The statement explains why the proposed development is appropriate, having regard to the key planning policies, as well as technical and environmental considerations.

1.4 This Planning Statement is supported by, and should be read in conjunction with, a suite of supporting plans, reports and technical documents, as set out below:



## Reports

- Application Form / Certificates
- CIL Form
- PROW Diversion (s275 application form)
- Planning Statement (by SLR Consulting)
- Schedule of Accommodation (by CSA)
- Design and Access Statement (by CSA Environmental)
- Air Quality Assessment (by Air Quality Solutions)
- Flood Risk Assessment and Drainage Strategy (by Glenn Charles Associates)
- Biodiversity Baseline Report and Preliminary Ecological Appraisal (by AiDash)
- Biodiversity Net Gain Statutory Metric (by AiDash)
- BNG Report (by AiDash)
- Landscape Visual Impact Assessment (by CSA Landscape)
- Transport Statement (by Glenn Charles Associates)
- Arboricultural Impact Assessment (By RPS)
  - Arboricultural Method Statement (by RSP)
  - Tree Schedule (by RSP)

## Plans

- Location Plan [CSA/5675/108]
- Opportunities and Influences Plan [CSA/5675/109]
- Development Framework Plan [CSA/5675/110 Rev A]
- Planning Layout [CSA/5675/111 Rev B]
- Street Level Illustrations [CSA/5675/117]
- Birds Eye Aerial Visualisation [CSA/5675/116]
- Proposed Site Access Arrangement [22-011-001]
- Refuse Vehicle Tracking – Sheet 1 [22-011-003 Rev A]
- Refuse Vehicle Tracking – Sheet 1 [22-011-004 Rev A]
- Illustrative Landscape Strategy Plan [CSA/5675/118 Rev A]
- Topographical Survey [20109]
- PROW Diversion Plan [CSA/5675/119]



## 2.0 The Site and Surroundings

### Site Location

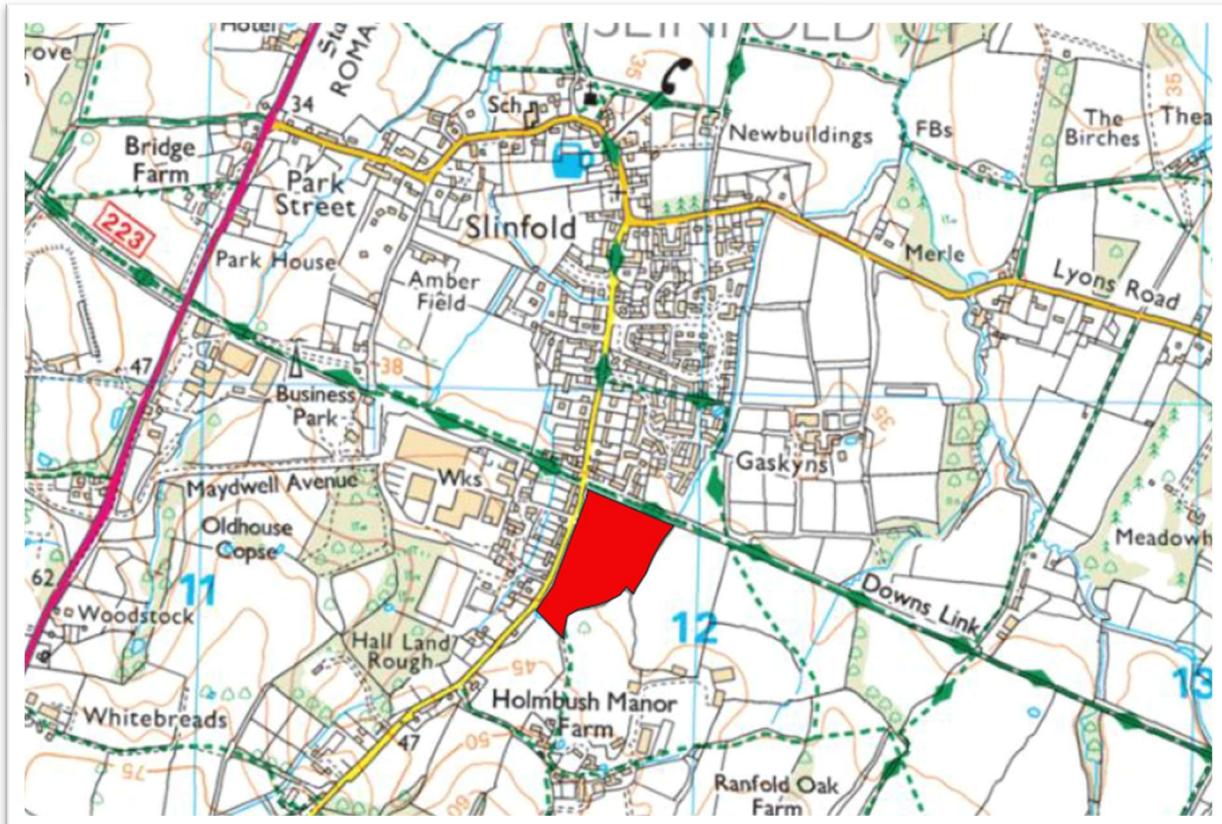
- 2.1 The site is 3.9ha in size and is situated to the southern end of the village of Slinfold, in the jurisdiction of Slinfold Parish Council and Horsham District Council. The site currently sits outside of the defined Built-up Area Boundary of Slinfold but adjoins the village's existing settlement boundary along its northern and western edges. Slinfold is defined as a 'medium village' in the adopted settlement hierarchy.
- 2.2 The site is an allocation for housing within the made Slinfold Neighbourhood Plan (Policy 7: East of Hayes Lane) known as site 'PDS8'. PDS8 is included with the proposed built-up area boundary of Slinfold in the emerging Horsham Local Plan.
- 2.3 The site shares its northern boundary with the Downs Link – a popular and well used long distance trail linking Slinfold to the village of Rudgwick to the north and Christ's Hospital and Partridge Green to the south. The Downs Link in this location is also dedicated as Bridleway No.3569 and National Cycle Route 223. Public Footpath No.3782 also runs in a north-south direction within the site lining the Downs Link to Hayes Lane and beyond.
- 2.4 There is existing residential development located to the immediate north and west of the site, including a relatively new development of 14 houses at Welwyn Way (DC/18/0995). Commercial premises at Maydwell Avenue are located around 200m to the west of the site. Slinfold Tennis and Football Clubs are located around 100m to the south-west of the site. To the east and south of the site is open countryside with occasional clusters of farm buildings.
- 2.5 The central part of the village (The Street) is located around 750m to the north of the site, where various services and facilities can be found including the local pub (The Red Lyon), Slinfold Cricket Club, a local shop and Post Office (Slinfold Stores), Slinfold Village Hall, Slinfold Primary School, and St Peter's Church. This part of the village is also with the defined Slinfold Conservation Area and contains a number of listed buildings.
- 2.6 The village of Broadbridge Heath is located around 3km to the east of the site, and the larger town of Horsham is located around 6km to the east. Both settlements can be reached from Slinfold by bus. The site is located approximately 6km from Billingshurst to the south and directly connected via the A29 (Stane Street).
- 2.7 There are bus stops on The Street and Lyons Road providing access to Route 63 (connecting Slinfold to Broadbridge Heath and Horsham); and Route 100 (connecting Slinfold via Stane Street to Billingshurst, Steyning, Henfield and Burgess Hill).
- 2.8 The closest train stations to the site are Christ's Hospital (approx. 5km to the south-east), Horsham (approx. 9km to the east), and Billingshurst (approx. 6km to the south) which provide connections to Gatwick, London, Crawley, and destinations along the south coast including Portsmouth and Bognor Regis. Gatwick Airport is c.18km to the north-east of the site.
- 2.9 The site is located wholly within Flood Zone 1 as shown on the EA maps for flooding. The updated (January 2025) EA mapping shows some pockets of surface water flood risk at the site's north-east corner.
- 2.10 The site is located approximately 900m to the south-west of the Slinfold Stream and Quarry SSSI, and approximately 500m to the north-west of the Holmbush Manor Farm Meadow Site of Nature Conservation Importance (SNCI).



2.11 The site lies over 14km from the Arun Valley SAC to the south-west and falls within the Sussex North Water Resource Zone (SNWRZ). The site lies within the 'bat sustenance zone' of the Sussex Bat SACs (The Mens, Singleton and Cocking Tunnels and Ebernoe Common).

2.12 The site is outlined in red in Figure 2 below.

**Figure 2: Site Location Plan**



### Site Description

2.13 The 3.9Ha site is currently unused. It was grazed for many years, until a public footpath was created, opening up the site and preventing grazing. It is now mown periodically and overgrown vegetation is regularly cleared. The site slopes gently from southwest to northeast, ranging from 41.62m AOD falling to 35.17 AOD in the north-east corner.

2.14 There is a belt of trees along the western boundary with Hayes Lane. Five of these trees (all Oaks) are protected under TPO 1482. Mature trees define the site boundaries to the north, east and south.

2.15 The site contains no designated or non-designated heritage assets. The nearest listed buildings are located around 280m to the south of the site and include 'Wild Harry's' and 'Barn to Southeast of Wild Harry's' (both Grade 2 listed). Other listed buildings include 'Gaskyns' and 'Outbuilding Northwest of Gaskyns' (both Grade 2) which are located approximately 420m to the north-east of the site. The Slindon Conservation Area is located around 550m to the north of the application site, and includes a number of listed buildings including Grade 2 listed St Peter's Church, and the Red Lyon Pub.



- 2.16 PROW 3782 runs through the site connecting the Downs Link (Bridleway 3569\_1) to Hayes Lane.
- 2.17 The immediate surroundings of the site are characterised by a mix of residential buildings on the opposite side of Hayes Lane and to the north of the Downs Link, and open countryside to the south and east. Despite the open countryside surrounds, owing to topography and vegetation, the site is relatively self-contained. The site abuts the defined settlement boundary of Slinfold to its north and west.
- 2.18 As the allocation of this site for residential development in the Slinfold NP suggests, the site is a suitable location for modest residential development, with existing built form to its immediate north and west and the presence of existing services and facilities nearby. The site is relatively flat and contains no major ecological or landscape constraints that would preclude development coming forward.



## 3.0 Planning History

3.1 Relevant planning applications for previous development proposals on the site are listed in Table 1 below.

**Table 1: Planning History**

LPA Reference Number	Address	Description	Decision
DC/15/0591	Land East of 1 To 25 Hayes Lane Slinfold West Sussex	The erection of up to 50 residential dwellings, new Scout hut, formation of new vehicular and pedestrian access onto Hayes Lane and pedestrian access onto South Downs Way, provision of children's play area, sustainable urban drainage system, associated car parking and landscaping.	Refused 28/07/2015

3.2 Application DC/15/0591 was refused by HDC for the following reasons:

**1. Principle of development**

The proposal would result in development inconsistent with the overarching strategy for development set out in the emerging Horsham District Planning Framework and would be best placed to be considered through the neighbourhood plan process. The proposed development is therefore contrary to Policy CP5 of the Core Strategy (2007), Policies 2 and 3 of the Horsham District Planning Framework and the National Planning Policy Framework (2012).

**2. Harm to local character**

The proposed provision of up to 50 no. dwellings in this location, with the associated loss of trees, scrub and vegetation, would significantly diminish the informal and open character of this area, creating a discordant and uncharacteristically urbanised environment that would serve to derange the noticeable transition between the more suburban context of the village and the more rural character of the open countryside to the south and east. The proposed development would, therefore, be harmful to the character and appearance of the locality, contrary to Policy DC9 of the Horsham District Local Development Framework: General Development Control Policies (2007) and Paragraphs 7 and 64 of the National Planning Policy Framework (2012).

**3. Failure to secure contributions**

The proposed development makes no provision for contributions towards improvements to education provision; libraries; fire and rescue services; open space; sport and recreation facilities; community facilities; or affordable housing and is, therefore, contrary to Policies CP12 and CP13 of the Horsham District Local Development Framework: Core Strategy (2007) and the Horsham District Local Development Framework: Planning Obligations Supplementary Planning Document (SPD) as it has not been demonstrated how the infrastructure needs of the development would be met.



## 4.0 Pre-Application Engagement and Statement of Community Involvement

### Pre-Application Advice

4.1 In 2022, a pre-application enquiry was submitted to the Council which asked for initial views and informal guidance on a proposed scheme for 36 dwellings on the application site. The pre-app proposal was considered by Officers, and a written response was received on 11 August 2022.

4.2 In summary, the Officer's informal comments acknowledged the allocation of the site in the Slinfold NP and considered the principle of the scheme for development of this site to be generally acceptable. The Officer noted the proposed layout was largely acceptable and they did not consider the proposal to result in any adverse amenity impacts.

4.3 Notwithstanding this, a concern was raised regarding the extension of the development parcel beyond the line shown in the allocation plan within Policy 7 (as plot 31 extended slightly further to the south), and the lack of garaging for the affordable units.

4.4 The scheme now proposed has carefully considered the Officer's advice and the scheme has been amended to seek to address the comments provided. Plot 31 of the pre-app plan has been revisited, and Plots 32 and 33 are now shown at the south of the site in line with the building envelope of the village opposite. Whilst the proposed scheme does not include garages for all AH units, it should be noted that not all the market units include garages, so the scheme overall is tenure blind. A pedestrian link has been included to circulate the site, linking in with the PROW at the north and the south.

4.5 Several points of advice were given with regards to the detailed design of the units and the site landscaping. Detailed design will be submitted for approval at RM stage, but it is anticipated that locally appropriate materials will be used, and suitable architectural features will be designed into the units including chimneys.

4.6 It was originally the intention that a planning application was to be submitted soon after the pre-application process in 2022; however, the water neutrality issue that was highlighted in the pre-app response resulted in a delay to the submission. This matter was recently resolved through the availability of water mitigation credits administered through the Council's SNWCS scheme, and even more recently, it has been confirmed by Natural England and HDC that there is no longer requirement for developments to demonstrate water neutrality.

### Community Involvement

4.7 Our client has also remained in contact with representatives from Slinfold Parish Council and email exchanges between our client and the Chair of the PC were made in April 2025 where an update on the progress of the site was provided. This explained the delay which had been caused by the unexpected water neutrality requirements which came to light in September 2021.

4.8 Email and letter exchanges from our client to the Chair of Slinfold PC continued in May 2025 which thanked the Parish Council for its constructive engagement to date and advised a timetable for submission of an Outline application for the development of the site.



## 5.0 The Proposed Development

5.1 In line with the allocation in Policy 7 of the Slinfold Neighbourhood Plan, Outline planning permission is sought for the residential development of the site together with associated landscaping, parking and access. The description of the development is as follows:

*'Outline application with all matters to be reserved except for access and layout, for the erection of 38no. dwellings, (including the provision of on-site affordable housing units), together with access from Hayes Lane, vehicle and cycle parking, landscaping, open space and play provision, sustainable drainage, and re-alignment of Public Right of Way No.3782'.*

5.2 The mix of dwellings is proposed as follows:

**Table 2: Housing Mix**

Type	Number (Market)	Number (Affordable)
2-bed	8	2
3-bed	9	7
4-bed	4	4
5-bed	4	0
<b>TOTAL</b>	<b>25</b>	<b>13</b>

5.3 Of the 38no. dwellings proposed, 13no. will be affordable which equates to 34.2% of dwellings. A financial contribution calculated in line with the Council's Planning Obligations SPD will be provided to ensure the policy compliant affordable housing level of 35% is achieved.

5.4 Vehicular and pedestrian access to the site would be taken from the location of the existing gated access onto Hayes Lane, located at the north-west corner of the site. A 2.5m wide pedestrian footway will connect the existing Hayes Lane footway to a network of segregated footways and shared surfaces within the site. The access road would lead to an internal road network that will provide access to each dwelling. The internal network comprises areas of segregated roads and footways and areas of shared surface in lower trafficked places.

5.5 Parking is provided for each plot in line with WSCC parking standards. It is anticipated that there will be a total of 106 parking spaces within the site, through a combination of allocated driveway/garage parking, and unallocated bay parking. In addition to this provision (and as recommended by WSCC Highways), there will be a further 5 unallocated spaces for visitors located close to the site access to replace informal parking that occurs within an informal lay-by on Hayes Lane.

5.6 In accordance with WSCC cycle parking standards, there will be a minimum of two cycle parking spaces per dwelling. Cycle parking will be accommodated in garages where they are proposed; and where a dwelling does not have a garage, a suitably sized cycle store is proposed in the rear garden.

5.7 Each plot would be fitted with an EV charging point in line with Building Regulation requirements.



- 5.8 In accordance with the requirement of Policy 7 of the Slinfold NP, the site has been designed to respond to the linear character on the western side of Hayes Lane, as well as allowing for the retention of existing mature trees and hedgerows present along the site boundaries.
- 5.9 All 38no. houses are proposed to be no more than 2.5-storeys in height, and each dwelling has private amenity space and allocated parking.
- 5.10 The proposed development largely accords with the extent of the development parcel shown in the policies map for site PDS8, and the site includes the required buffer zone to its north, east and south. The development parcel mirrors the existing built envelope of the village on the opposite side of Hayes Lane, with the most southerly units (Plots 32 and 33) in line with existing properties Halland Cottage and the entrance driveway to The Potters and the sports club.
- 5.11 PROW No. 3782 is proposed to be retained and enhanced, albeit the PROW is proposed to be diverted slightly at its northern end to facilitate the development and to ensure that convenient access to the Downs Link is maintained.
- 5.12 An attenuation basin is proposed in the eastern side of the development within the designated 'buffer zone'. In addition, a series of play zones is proposed as a 'play trail' along the route of the PROW, with seating in appropriate locations within the open space area.
- 5.13 Details relating to the design of proposed dwellings, facing materials, boundary treatments and hard and soft landscaping will be reserved for future approval. Notwithstanding this, it is proposed that the site as a whole will be designed to the highest quality, utilising high quality facing and surface materials that reflect the local vernacular, alongside appropriate planting and energy-saving technologies.
- 5.14 A minimum of 10% biodiversity net gain is proposed to be delivered on site.



## 6.0 Relevant Planning Policy

6.1 This section sets out the key relevant planning policy at national and local levels. Section 6 will then discuss the principle of development, as it relates to the relevant policies and why the scheme is considered acceptable when taking account of the adopted plan, and material considerations.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. The following section will first note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of the proposal for the site.

### National Planning Policy Framework (NPPF, February 2025)

6.3 The most recently published National Planning Policy Framework (NPPF) was updated in December 2024, and then again in February 2025 and this carries full weight in decision making. The updated NPPF continues to establish a presumption in favour of sustainable development. **Paragraph 2** states that the NPPF is a material consideration in planning decisions.

6.4 **Paragraph 8** confirms that there are three dimensions to sustainable development - economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment).

6.5 **Paragraph 9** confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies but also taking into account local circumstances to reflect the need and opportunities in each area.

6.6 **Paragraph 11** continues to stress that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to-date development plan, or where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i) The application of policies in this Framework that protect areas or assets of particular importance ('Footnote 7' areas) provides a strong reason for refusing the development proposed; or
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

6.7 **Footnote 8** of the NPPF clarifies that the presumption in favour applies in situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites; or, where the Housing Delivery Test indicates that delivery of housing is substantially below (less than 75%) of the housing requirement over the previous three years. This is currently the case in Horsham as a 5-year supply cannot be demonstrated.



6.8 **Paragraph 12** states the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. If material considerations in a particular case indicate that the plan should not be followed, local planning authorities may take decisions that depart from an up-to-date development plan.

6.9 **Paragraph 14** continues to confirm that where the presumption (at paragraph 11d) applies, the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to outweigh the benefits provided that the neighbourhood plan was made within the previous 5 years, and the plan contains policies and allocations to meet its identified needs. The Slinfole Neighbourhood Plan was formally made in September 2018, and whilst the NP includes allocations to meet the identified needs of the Parish, the plan is now well over 5 years old, and as such the provisions of paragraph 14 do not apply.

6.10 **Paragraph 20** relates to strategic policies where it is set out that these policies should make sufficient provision for: housing (including affordable housing), infrastructure, community facilities, and conservation of the natural and built environment.

6.11 In terms of determining applications, **paragraph 39** of the framework states that it is a requirement for Local Planning Authorities to approach decisions in a positive and creative way. Planning Authorities should also work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, whilst seeking to approve applications for sustainable development where possible.

6.12 **Paragraph 48** reiterates the requirements set out in planning law that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. It actively encourages decisions on applications to be made as quickly as possible.

6.13 **Paragraph 56** states that planning conditions can be used to make a development acceptable, where it might otherwise be unacceptable. **Paragraph 57** goes on to say that the use of conditions should be kept to a minimum and only imposed if necessary, relevant, enforceable, precise and reasonable in all respects.

6.14 **Section 5** (delivering a sufficient supply of homes) sets out clearly that the Government is committed to significantly boosting the supply of homes (**paragraph 61**) in order to meet local needs and help make sure that land with permission is developed without unnecessary delay.

6.15 **Paragraph 63** states that the size, type and tenure of housing needed for different groups in the community should be reflected in planning policies, and should include those who require affordable housing, older people, people with disabilities, travellers, and people wishing to build their own homes.

6.16 **Paragraph 70** outlines the importance of small and medium size sites in the contribution to achieving the housing requirement of an area. These sites are often built out quicker and have less infrastructure requirements and associated risk.

6.17 **Paragraph 78** requires local planning authorities to identify an annual supply of deliverable sites sufficient to provide a minimum of 5 years' worth of housing calculated against the latest local housing needs figure (plus a buffer or either 5% or 20%). The latest position published in the Council's most recent Annual Monitoring Report (April 2023 – March 2024) indicates that the district has a 1.0-year supply of housing. This position is supported by a recent appeal



decision (Thakeham Mushrooms, 13 June 2025<sup>1</sup>), which indicates that the Council can only demonstrate a 1.0-year supply of housing land against the requirement (para 58). As such, the Horsham district does not currently have a 5-year housing supply as required by paragraph 78.

6.18 **Paragraph 83** seeks to promote sustainable development in rural areas by directing new housing in suitable location where it will help to enhance the vitality of village communities and to enable them to thrive.

6.19 **Section 8** seeks to promote healthy and safe communities, with **Paragraph 103** highlighting the importance of providing access to a range of high-quality open spaces and opportunities for sport and physical activity in order to promote the health and wellbeing of communities.

6.20 **Section 9** supports the provision of sustainable modes of transport, with **Paragraph 109** stating that transport issues should be considered from the earliest stages of plan making so that opportunities to promote walking, cycling and public transport use are identified and pursued.

6.21 **Paragraph 116** is clear that '*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*' [our emphasis].

6.22 **Paragraph 117** states that new development should give priority to pedestrian and cycle movements, should facilitate access to high quality public transport, should address the needs of people with reduced mobility, and should be designed to create places that are safe, secure and attractive.

6.23 **Section 11** relates to making the most effective use of land to make sure that decisions meet the need for housing as effectively as possible whilst improving the environment and making safe and healthy communities. **Paragraph 129** requires decisions to support developments that make efficient use of land taking into account the identified need for different types of housing and other forms of development as well as the importance of securing well-designed and beautiful, attractive and healthy places.

6.24 Design is covered in **Section 12**, where the Government attaches great importance to the design of the built environment. This policy emphasises that good design is an important component of sustainable development and that it should be inseparable from good planning, which should improve the quality of life in communities.

6.25 **Paragraph 131** states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

6.26 **Paragraph 135** states that new developments should be visually attractive due to good architecture, layout and appropriate and effective landscaping, as well as being sympathetic to local character, history, surrounding built environment and landscape setting.

6.27 **Paragraph 170** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

6.28 **Section 15** covers the natural environment. **Paragraph 192** stresses the importance of protecting and safeguarding ecological networks, including national and locally designated

<sup>1</sup> APP/Z3825/W/24/3350094



sites of importance to biodiversity, wildlife corridors. It also promotes the conservation, restoration and enhancement of priority habitats, ecological networks and the protection of priority species. **Paragraph 193(d)** seeks for a net gain in biodiversity to be demonstrated, which accords with the requirement set out in the Environment Act 2021 to secure a minimum of 10% biodiversity net gain.

6.29 **Paragraph 193(d)** states that developments that conserve or enhance biodiversity should be supported and that opportunities to incorporate biodiversity improvements in and around developments should be encouraged.

## Adopted Development Plan

6.30 The application site falls within the jurisdiction of Horsham District Council (HDC) where the adopted development plan comprises the Horsham District Planning Framework (HDPF 2015); the West Sussex Joint Minerals Local Plan (2018); and all made Neighbourhood Plans.

## Horsham District Planning Framework

6.31 The Horsham District Planning Framework (HDPF) was adopted in November 2015. Those policies of the adopted HDPF of most importance to the application proposals are listed below.

- Policy 1 - Strategic Policy: Sustainable Development
- Policy 2 – Strategic Policy: Strategic Development
- Policy 3 – Strategic Policy: Development Hierarchy
- Policy 4 – Strategic Policy: Settlement Expansion
- Policy 15 – Strategic Policy: Housing Provision
- Policy 16 – Strategic Policy: Meeting Local Housing Needs
- Policy 24 – Strategic Policy: Environmental Protection
- Policy 25 – Strategic Policy: The Natural Environment and Landscape Character
- Policy 26 – Strategic Policy: Countryside Protection
- Policy 27 – Settlement Coalescence
- Policy 30 – Protected Landscapes
- 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
- Policy 35 – Strategic Policy: Climate Change
- Policy 36 – Strategic Policy: Appropriate Energy Use
- Policy 37 – Sustainable Construction
- Policy 38 – Strategic Policy: Flooding
- Policy 39 – Strategic Policy: Infrastructure Provision
- Policy 40 – Sustainable Transport
- Policy 41 – Parking



## West Sussex Joint Minerals Local Plan (2018)

6.32 The West Sussex Joint Minerals Local Plan 2018 was adopted in July 2018. The following policies are considered to be most relevant in the context of the proposal:

- Policy M9 – Safeguarding Minerals

## Emerging Development Plan

### Horsham District Local Plan (2023 – 40)

6.33 The emerging Horsham District Local Plan (2023 – 2040) has been through Regulation 19 consultation stage and was submitted to the Planning Inspectorate for formal Examination in July 2024. Examination Hearings commenced in December 2024 but were paused due to concerns about the Duty to Co-Operate and soundness, primarily relating to proposed unmet housing need and water neutrality.

6.34 The Inspector wrote to the Council on 4 April 2025 recommending that the emerging plan is withdrawn due principally to its conclusions that the plan failed to meet the Duty to Co-Operate. Owing to changing material circumstances relating to water neutrality and Duty to Cooperate that have recently emerged, the Council wrote to PINS in November 2025 to request that the Hearings are re-opened. The Inspector has responded and has agreed to hold an 'exploratory meeting' in February 2026.

6.35 Despite the emerging Local Plan being paused, the draft policies and its evidence base still remain a material consideration in decision making and shows a direction of travel for the emerging policies and allocations that the Council supports.

6.36 The following draft policies contained with the Submission Local Plan do not hold full weight at this stage but nevertheless are considered to be relevant in the context of the proposal.

- Policy 1: Sustainable Development
- Policy 2: Development Hierarchy
- Policy 3: Settlement Expansion
- Policy 6: Climate Change
- Policy 7: Appropriate Energy Use
- Policy 8: Sustainable Design and Construction
- Policy 9: Water Neutrality
- Policy 10: Flooding
- Policy 11: Environmental Protection
- Policy 12: Air Quality
- Policy 13: The Natural Environment and Landscape Character
- Policy 14: Countryside Protection
- Policy 15: Settlement Coalescence
- Policy 17: Green Infrastructure and Biodiversity
- Policy 19: Development Quality
- Policy 20: Development Principles



- Policy 21: Heritage Assets and Managing Change within the Historic Environment
- Policy 23: Infrastructure Provision
- Policy 24: Sustainable Transport
- Policy 25: Parking
- Policy 27: Inclusive Communities, Health and Wellbeing
- Policy 37: Housing Provision
- Policy 38: Meeting Local Housing Needs
- Policy 39: Affordable Housing
- Policy 40: Improving Housing Standards in the District

## **Slinfold Neighbourhood Plan (2018)**

6.37 The Policies and Aims contained within the Slinfold Neighbourhood Plan that are considered most relevant to this application are:

- Aim 1: Preventing Coalescence between Slinfold and Broadbridge Heath
- Policy 3: Green Infrastructure
- Policy 4: Conserve and Enhance Biodiversity
- Policy 5: Development Principles
- Policy 6: Housing Mix
- Policy 7: East of Hayes Lane
- Policy 14: Open Space
- Aim 4: Public Rights of Way
- Aim 5: Quiet Lanes
- Aim 6: Off Street Parking
- Aim 7: Public Transport

6.38 Policy 7 (East of Hayes Lane) allocates the site (PDS8) for housing development, and states the following:

### **Residential development at PDS8: East of Hayes Lane will be supported where:**

1. **The design positively responds to the prevailing character of the surrounding area (i.e. a linear proposal which mirrors that on the opposite side of Hayes Lane);**
2. **The houses are no more than two and a half storeys in height to reflect the local vernacular;**
3. **Proposals allow for the retention of existing mature trees and hedges;**
4. **Proposals include an appropriate buffer to enable and improve access to the Downs Link; and**
5. **Proposals seek to conserve and enhance biodiversity and existing ecological networks.**



## Supplementary Planning Documents and Guidance

6.39 The Council has also adopted several separate Supplementary Planning Documents (SPDs) and other guidance documents which are material considerations in decision making. Those most relevant to the proposals are:

- Planning Obligations and Affordable Housing SPD (2017)
- Community Infrastructure Levy (CIL) SPD (2017)
- County Parking Standards and Transport Contributions Methodology (2020)
- Air Quality and Emissions Mitigation Guidance for Sussex (2021)
- Biodiversity and Green Infrastructure Planning Advice Note (PAN) (2022)
- Shaping Development in the Horsham District Planning Advice Note (PAN) (2025)



## 7.0 Summary of Key Planning Consideration

7.1 This section sets out the key planning considerations including the sustainability merits of the proposal and the economic, social and environmental benefits which the application will deliver, with regard given to the policies set out in the preceding section.

### Principle of Development

7.2 The site is allocated for residential development by virtue of Policy 7 of the made Slinfold Neighbourhood Plan. Whilst the Slinfold NP is over 5 years old (having been made in 2018) it still forms part of the adopted development plan for the district. In addition, the housing land supply position in the Horsham District is such that the tilted balance of NPPF11d is engaged, which directs that applications for housing on sustainable sites should be approved without delay. The allocation of housing in Policy 7 of the Slinfold NP continues to carry weight in the planning balance, and alongside other allocations within the plan, should be seen as a minimum requirement for housing delivery in the parish.

7.3 As such, as an allocated site in a Neighbourhood Plan, the principle of residential development on this site is considered to be acceptable. The principle acceptability of this site is further supported by the current housing need situation in Horsham, the site's compliance with the Shaping Development in the Horsham District Planning Advice Note, and by virtue of the site's sustainable location – as discussed below:

#### Housing Need

7.4 As the Local Plan (HDPF, 2015) was adopted over 5 years ago, the Council's housing target is now derived from the Government's (current) Standard Methodology rather than the adopted housing target of 800 dwellings per annum. The government's most recently published Standard Method requires the delivery of 1,357 homes per annum in Horsham (this includes the latest affordability data published in March 2025 and is a 45% increase on the previous standard method LHN of 917, and a 69% increase from the HDPF housing target).

7.5 HDC acknowledged that it is unable to demonstrate a robust five-year supply of housing as required by national policy, with the latest published position by Horsham DC stating a 2.9-year supply of housing against the adopted requirement (AMR, January 2024). However, recent appeal decisions in Horsham (including Thakeham Mushrooms, 13 June 2025<sup>2</sup>) indicates that the Council can now only demonstrate a 1-year supply of housing land against the requirement (para 58). The Inspector for the July 2025 appeal decision to allow an 800-unit development at Horsham Golf and Fitness<sup>3</sup> described the housing land supply position in Horsham as 'lamentable'. As such, it is clear that Horsham district does not currently have anywhere near a 5-year housing supply as required by paragraph 78 of the NPPF.

7.6 The publication of the new NPPF in December 2024 (updated in February 2025) and the new housing targets that accompanied it (1,329 homes per annum), results in a worsening five-year land supply position in Horsham, which will remain until a new Local Plan is formally adopted.

7.7 Paragraph 11 of the Framework continues to set out the '*Presumption in favour of sustainable development*' which for decision making means either approving development proposals that

<sup>2</sup> APP/Z3825/W/24/3350094

<sup>3</sup> APP/Z3825/W/24/3355546



accord with an up-to-date development plan without delay, or: where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date granting permission unless:

- i) *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

7.8 The Framework directs that where the local planning authority cannot demonstrate a five-year supply of housing land, that development plan policies relevant to the supply of housing are to be considered out of date. As this is the acknowledged case in Horsham, the presumption in favour of sustainable development as set out in paragraph 11d of the NPPF is therefore engaged and as the provisions of paragraph 11d part (i) do not apply, and applications must be considered positively in line with the '*tilted balance*'.

7.9 Whilst the Council's five-year housing land supply position is likely to be closer to the 1-year supply derived from the recent appeal decision, this clearly shows a severe undersupply of housing against the Council's own targets and an acute need for new homes in the district.

### **Shaping Development in the Horsham District Planning Advice Note (PAN)**

7.10 In light of the Council's continuing inability to demonstrate a five-year supply of housing sites, as well as the key objective of Government policy to significantly boost the supply of homes; the Council has updated the Facilitating Appropriate Development document (FAD, Oct 2022) by publishing the Shaping Development in the Horsham District PAN which forms a material planning consideration in decision making.

7.11 The advice contained in the PAN does not alter the statutory decision-making framework but sets out the weight that can be given to current and emerging local policy and has been produced to enable the Council to act proactively to continue to deliver housing in a sustainable manner. The PAN supports applications that relate to sites allocated in the Local Plan and in Neighbourhood Plans as well as for proposals located outside the defined settlement boundaries. In relation to sites outside settlement boundaries, the PAN echoes the requirements of HDPF Policy 4 and states that applications will be considered positively provided that all of the following criteria are met:

- The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;
- The level of expansion is appropriate to the related settlement;
- The proposal meets local housing or employment needs;
- The impact does not prejudice long term development; and
- The development is with an existing defensible boundary.

7.12 The proposed development accords with all the above criteria of the PAN including its allocation for development in Slinfold Neighbourhood Plan (Policy 7) and its location adjoining the Slinfold settlement boundary. This demonstrates that the site is a sustainable and suitable location for additional housing growth in Slinfold, in the context of the Council's documented housing shortfall.



- 7.13 In addition to the above listed PAN criteria, proposals must also be shown to be deliverable in the short-term, and the PAN requires that relevant supporting information should be included to demonstrate when development would be expected to be delivered (para 5.16). The proposed development is a modest scale development of up to 38no. homes that is available now and can be delivered immediately.
- 7.14 The remainder of this statement details the technical matters in relation to the proposal, demonstrating that there are no barriers to the delivery of the site.
- 7.15 Given the present policy position and application of the '*tilted balance*' as described above; alongside the allocation of the site in Policy 7 of the Slinfold NP and the application of the PAN which carries weight in decision making at this time; it is our view that the principle of residential development on this site is acceptable.

### **Site Sustainability**

- 7.16 The Site is located in the village of Slinfold, immediately adjacent to the existing Built-Up Area Boundary. Slinfold is identified as a 'Medium Village' within the settlement hierarchy. Policy 3 of the HDPF states that these settlements have:

*'a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day-to-day needs for residents but rely on small market towns and larger settlements to meet a number of their requirements'.*

As set out in Section 2 of this report, Slinfold has plentiful services and facilities, including a Primary School, local shop, post office, and village hall, and has good accessibility to public transport.

- 7.17 It is acknowledged that whilst the site lies outside of the Built-Up Area Boundary of Slinfold, it accords with all criteria of the Shaping Development in the Horsham District PAN and it also benefits from being allocated for residential development within the Made Slinfold Neighbourhood Plan.
- 7.18 By virtue of its allocation in the Slinfold NP, its adherence to the PAN criteria, and its inclusion as a 'committed site' in the Council's latest housing trajectory; it is reasonable to assume that the Council considers this site to be sustainable and appropriate for residential development and represents a natural and logical extension to the village, which compliments its existing built form.

### **Character and Appearance**

- 7.19 Whilst the proposal is submitted in outline form, details of the proposed access and layout of the site are proposed in full. As such, a planning layout of the site has been submitted, which has been informed by the requirement of Policy 7 of the Slinfold NP. Policy 7 requires the design of the site to respond to the linear design character on the western side of Hayes Lane, as well as allowing the retention of existing mature trees and hedgerows. Policy 7 requires all units to be no more than 2.5-storeys in height to reflect the local vernacular and requires a buffer to enable appropriate access to the Downs Link.
- 7.20 To meet the requirements of Policy 7, the planning layout has positioned plots 1-11 and 28-32 to face Hayes Lane which mirrors existing units on the opposite side of the road. To further accord with the local vernacular, all units are proposed to be no more than 2.5-storeys in height and will be designed to include locally distinctive architectural features and facing materials.



7.21 Policy 3 of the Slinfold NP seeks to protect, retain and enhance existing green infrastructure features and their settings including The Downs Link, Public Rights of Way, hedgerows and woodlands. The proposed development seeks to protect as much of the existing green infrastructure as possible within the site boundaries to maintain habitat function, and to ensure the site is appropriately screened. To ensure this requirement is met, the planning layout shows the linear row of units to be set back from Hayes Lane to ensure there is no encroachment into the root protection areas of the existing boundary trees (including 5 protected oak trees).

7.22 The planning layout has paid careful attention to the land uses shown in the Policies Map for site PDS8, which includes the development parcel to the eastern side of the site, and a buffer zone to the west, north and south. These spaces are divided by the PROW (No. 3782) which runs north-south from the Downs Link. The proposed layout largely accords with the land use distribution shown in PDS8, albeit with some minor deviations to ensure the mature trees along the western boundary are safeguarded. It is acknowledged that plots 32 and 33 at the southern end of the site are positioned slightly beyond the southern extent of the development parcel shown in PDS8. Whilst there is some very minor encroachment into the southern buffer zone, these units are in line with the built form opposite (including Halland Cottage and the entrance driveway to The Potters and the sports club) and are well within the village building envelope and defined BUAB on the opposite side of Hayes Lane. As such, it is not considered that this slight encroachment results in any significant harm to the character of the village or its wider countryside surroundings, and the inclusion of these plots makes best use of the site in accordance with NPPF paragraph 129.

7.23 The routing of the PROW is proposed to be amended slightly to facilitate the development parcel, and this is described in more detail in paragraphs 7.41 – 7.45 of this statement.

7.24 The overall site area is 3.93ha and the residential development parcel is 1.62ha. The proposed 38 homes will therefore equate to a net density of 23dph which is in line with densities of existing development in the vicinity, and appropriate for the edge-of-village location. The quantum of development proposed has been drawn from the influence of recent development to the north of the site at Welwyn Way and Six Acres which is suburban in character and is of a medium density with 2-storey detached and semi-detached houses. Policy 7 of the Slinfold NP does not dictate a number of dwellings that this site should seek to deliver, and we propose that 38 units is an appropriate number for this site whilst respecting the key site constraints. Pre-application discussions with Officer's at HDC in 2022 did not indicate that this quantum of development would be unacceptable.

7.25 Policy 5 of the Slinfold NP states that development proposals in the village '*which seek to respect the design, density and layout of the surrounding area as detailed in the Slinfold Parish Design Statement will be supported*'. This Outline application seeks to meet the requirements of Policy 5, with the Reserved Matters stage offering the opportunity to secure the precise design details to ensure the site is constructed in accordance with the design parameters set out in the Slinfold Parish Design Statement (2006).

7.26 In summary, the proposed development seeks to provide a high-quality residential development that responds positively to the character of its surroundings and accords with policies within the Slinfold NP and Policies 32 and 33 of the HDPF. The proposal has been designed to make the most efficient use of the allocated land (as required by NPPF 129) and to respond to the natural constraints of the site, including the existing boundary vegetation, topography and landscape character; to ensure that the size, scale and siting of the proposed dwellings are appropriate.



7.27 Accompanying this application is a Design and Access Statement, a Landscape Strategy Report and Illustrative Landscape Masterplan to demonstrate how the proposed development would sit comfortably in its surroundings.

## Affordable Housing and Housing Mix

7.28 The proposed scheme has had regard to the aims and objectives of housing delivery and housing need within the district, as well as locally within Slinfold. Table 2 of this report sets out the illustrative mix of unit sizes within the development which comprises a mix of 2-, 3-, 4- and 5-bedroom homes which is in accordance with the requirements of Policy 6 of the Slinfold NP. Whilst no 1-bed units are proposed, this approach was considered acceptable within the Council's 2022 pre-app response.

7.29 As the application is submitted in Outline form, the precise mix will be agreed at Reserved Matters stage in line with the Council's housing latest mix requirements and identified needs in Slinfold. Notwithstanding this, the illustrative mix is in general accordance with current policy and is in line with the requirements of Policy 16 of the HDPF which requires housing mix to be appropriate for the site, the locality, and the surrounding character.

7.30 13no. of the dwellings are proposed to be affordable tenure. This equates to 34.2% on-site affordable housing which is acknowledged as being slightly below the policy requirement of 35%. If it is required by the Council, the remaining 0.8% requirement can be provided for by a commuted sum in line with the Council's Planning Obligations and Affordable Housing SPD (2017).

7.31 It is considered that the proposed mix is suitable both in design terms and in achieving efficient use of the site as required by NPPF paragraph 129. The applicant is committed to ensuring that the proposed scale and density of the development respects the surrounding semi-rural character of Slinfold. Whilst it is acknowledged that there are no 1-bed units proposed, we are of the understanding that 2 and 3-bedroom homes are in high demand within the district (especially in more rural villages such as Slinfold), and as such, there is a strong justification for the proposed mix shown in Table 2.

## Access and Highways

7.32 Ahead of the submission of this application, pre-application discussions have been held with WSCC Highways as the LHA which included a meeting held on 30<sup>th</sup> May 2025 and a written response received 01 June 2025. Details of the pre-app advice are included within Appendix A of the submitted Transport Statement.

7.33 The site is situated within a sustainable location benefiting from good connections to the strategic road networks of the A29 (Stane Street) and A264. Bus stops are located on Lyons Road providing services to the nearby towns of Broadbridge Heath and Horsham (Route 63) and to Burgess Hill via Billingshurst, Steyning and Henfield (route 100). Nearby train stations include Christ's Hospital, Horsham and Billingshurst which provide connections to Gatwick, London, Crawley, and destinations along the south coast including Portsmouth and Bognor Regis. London Gatwick Airport is also c.18km to the north-west of the site.

7.34 A number of active travel opportunities are available with convenient proximity to the site, including existing walking routes (Downs Link, rights of way etc) which connect the site to the wider village and beyond.

7.35 Vehicular and pedestrian access to the site would be taken from the location of the existing gated access onto Hayes Lane, located at the north-west corner of the site. This would be in



the form of a simple priority junction with 5.5m width and 6m kerb radii. A 2.5m wide pedestrian footway will connect the existing Hayes Lane footway to a network of segregated footways and shared surfaces within the site. The access road would lead to an internal network that will provide access to each dwelling. The internal network comprises areas of segregated roads and footways and areas of shared surface in lower trafficked places. Full access details can be found in the submitted Transport Statement.

- 7.36 Parking would be provided for each plot in line with WSCC parking standards – it is envisaged that there will be a total of 106 parking spaces within the site, through a combination of allocated driveway/garage parking, and unallocated bay parking. In addition to this provision, there will be a further 5 unallocated spaces for visitors located close to the site access to replace informal parking that occurs within an informal lay-by on Hayes Lane (a proposal that has been recommended by WSCC Highways).
- 7.37 In accordance with WSCC cycle parking standards, there will be a minimum of two cycle parking spaces per dwelling. Cycle parking will be accommodated in garages where they are proposed; and where a dwelling does not have a garage, a suitably sized cycle store is proposed in the rear garden.
- 7.38 Each plot would be fitted with an EV charging point in line with Building Regulation requirements.
- 7.39 As a result of the development of 38 homes on this site, it is anticipated that an additional 19 trips in both the AM and PM periods would take place. This is a relatively low increase in vehicle movements in the vicinity, and it is not thought that there would be any significant impact on junction capacity or on the local highway network.
- 7.40 In view of the above it is reasonable to consider that the proposed development is acceptable in access and highway terms, and accords with the requirements set out in Section 9 of the NPPF, particularly paragraph 116 which states that applications should only be refused on highways grounds if there would be a severe impact on the highways network. Further details are set out in the accompanying Transport Statement which demonstrates that the proposal will not result in a significant impact on the local highways network.

## Public Right of Way

- 7.41 PROW 3782 currently runs through the site, from the north of the site where it connects the Downs Link, to PROW 1467 at the site's southern end where it leads users to Hayes Lane.
- 7.42 As part of the development, it is proposed that the PROW will be retained and improved (including resurfacing) but will be re-aligned slightly in order to facilitate the proposed development parcel. It is proposed that the PROW will be moves slightly to the east, and the access point connecting the route to the Downs Link at the north would be reconfigured. Plans to show the proposed changes to the PROW route have been submitted in support of this application.
- 7.43 The supporting text of Aim 4 of the Slinfold NP states that the Parish Council '*supports improvements to public pathways which would increase their accessibility*', and the Aim itself goes on to say that '*proposals that provide measures to maintain and improve the connectivity of the Public Rights of Way throughout the Plan area will be supported*'. Given the PROW is to be retained and improved, it is considered that the proposed changes will accord with the aspirations of the Slinfold NP and the requirements of Aim 4.



7.44 A proposal to change the PROW routing when proposed in connection to a planning application requires a formal application to be submitted under s257 of the Town and County Planning Act 1990. It is understood that such applications are administered by HDC on behalf of WSCC. Enclosed with the application is a completed application form to formally request this change. The requisite fee will be paid separately upon receipt of the Council's invoice. Please can the Council's Legal Team be instructed on this matter without delay in order to commence the required statutory consultation period to ensure the proposed diversion can be confirmed as soon as planning permission is granted.

7.45 It is understood that the legal test to determine the acceptability of the proposed diversion is whether the diversion is '*necessary in order to enable development to be carried out*'. In this case, in order to facilitate the proposed development of 38 units within the confines of the allocated development parcel (site PDS8), the PROW is required to be moved slightly to the east. The route will still connect from the Downs Link (albeit in a slightly different location) and lead to Hayes Lane as existing, so users of the route will not be disadvantaged. The surfacing of the route is also proposed to be improved, leading to a public benefit overall. In addition, the proposed layout of the scheme shows a new pedestrian pathway leading from the existing PROW through an area of shared surfacing adjacent to the retained mature trees that front onto Hayes Lane. This provides an additional link for pedestrians through the site which connects the southern end of Hayes Lane with the Downs Link.

## Ecology and BNG

### Habitat Protection and Enhancement

7.46 A Preliminary Ecological Appraisal (by AiDash) has been submitted alongside the application which confirms that the site is not located within or adjacent to any statutory designated sites for nature conservation. The PEA identifies that the site is located with 10km of three statutory designated sites, including Slinfold Stream and Quarry Site which is located 930m to the northeast of the site, but confirms that there would be no significant impacts on these nearby sites.

7.47 Two Local Wildlife Sites are located within 2km of the site, but due to the small scale of the proposal, neither of these LWS's are anticipated to be adversely affected by the proposed development.

7.48 The site falls within the consultation zone for The Mens Sussex Bat Special Areas of Conservation (SAC) which requires special consideration for bats under the requirements of Policy 31 of the HDPF.

7.49 The PEA recommends that eDNA surveys for Great Crested Newts are required for ponds within 250m of the site. In addition, the PEA recommends that further reptile surveys are required, and ground level tree assessments (for bat roosts). These surveys have been instructed, and the results will be provided to the LPA upon completion.

7.50 Precautionary methods of working are recommended for the protection of invertebrates, amphibians, reptiles, birds, badgers and other mammals including hedgehogs. Ecological enhancements have been recommended in the PEA which include the provision of wildlife buffers, 13cm hedgehog holes in boundary fencing, the installation of bird and bat boxes on retained mature trees, and the inclusion of hibernacula and log piles. Where possible these features will be designed into the layout of the scheme, and it is anticipated that the inclusion of the recommended habitat enhancement can be secured by an appropriately worded condition.



7.51 It is considered that the proposed development will appropriately seek to minimise impacts on existing wildlife and habitats in accordance with the requirements set out in Policy 31 of the HDPF, and Policies 3 and 4 of the Slinfold Neighbourhood Plan.

### **Biodiversity Net Gain**

7.52 The submitted BNG Baseline Report (by AiDash) calculates that the 3.9Ha site provides an existing biodiversity value of 12.24 biodiversity units from area habitats, and 1.57 biodiversity units from 0.29km hedgerow habitats. The predominant habitat types within the site are modified grassland and surrounding woodland.

7.53 A Biodiversity Net Gain Report and Statutory BNG Metric has been submitted with the planning application.

7.54 Overall, the proposal results in a +10.18% increase in habitat units (+1.25 units), and +84.68% in hedgerow (linear) units (1.33 units). There is no gain or loss in watercourse habitats. The biodiversity gain is proposed to be accommodated on site as detailed in the BNG Report. It is understood that the gains amount to 'significant' on-site gain therefore its provision and management over 30 years will need to be secured within a s106 agreement.

## **Trees, Landscaping and Open Space**

### **Trees**

7.55 An Arboricultural Impact Assessment (containing Tree Survey) has been submitted in support of the application. The AIA surveyed 64 individual trees which includes 5no. Oak trees protected by TPO on the western boundary. Other tree groups and hedgerows were also surveyed. The site contains no ancient woodland or veteran trees.

7.56 To facilitate the development, 4no individual trees and one tree groups is required to be removed. No Category A trees or groups are proposed for removal. 93.8% of trees on site are to be retained. To compensate for the tree losses, new tree planting will be incorporated into the site design as shown in the submitted Landscape Masterplan.

7.57 Where any encroachment into tree RPAs is required, 'no-dig' construction methods will be used to reduce the impact on retained trees. This and other protection measure are detailed in the Tree Removal and Protection Plan (Appendix D of the AIA).

### **Landscape and POS**

7.58 A Landscape Visual Impact Assessment (LVIA) has been submitted in support of the application which described the site context and landscape character. The LVIA judges the site to be very well contained by existing boundary screening and confirms that the site is not subject to any statutory or local landscape designations. The site is described as having 'medium' landscape quality.

7.59 The LVIA considers that with appropriate mitigation measures to screen views and enhance biodiversity opportunities, the proposed development can be accommodated on site without giving rise to any significant landscape or visual impacts on the wider rural and semi-urban surrounds.

7.60 The submitted planning layout shows the site has been designed to incorporate the required buffer zones to the north, east and south of the site; and this area is to be used as informal open space comprising the attenuation basin, the re-routed PROW, and a series of natural play areas and seating areas.



7.61 Accompanying the application is an Illustrative Landscape Strategy Plan (see Appendix F of the LVIA) which demonstrates the types of hard and soft landscaping that would be suitable to include within the site. It is anticipated that the precise landscaping design details will be secured by a suitable worded condition for subsequent approval by the Council.

## Heritage Assets

7.62 The site contains no designated or non-designated heritage assets. The nearest listed buildings are located around 280m to the south of the site and include 'Wild Harry's' and 'Barn to Southeast of Wild Harry's' (both Grade 2 listed). Other listed buildings include 'Gaskyns' and 'Outbuilding Northwest of Gaskyns' (both Grade 2) which are located approximately 420m to the north-east of the site. The Slinfold Conservation Area is located around 550m to the north of the application site, and includes a number of listed buildings including Grade 2 listed St Peter's Church, and the Red Lyon Pub.

7.63 Given the distance between the site and the nearest heritage assets, coupled with natural screening which limits views into the site; it is not considered that the development of this site for residential use will have a significant impact on the wider historic setting of the Slinfold Conservation Area nor any of the nearby listed buildings.

7.64 The proposed development is therefore considered to be consistent with the provisions of Chapter 16 of the NPPF, Policy 34 of the HDPF, and the aims and objectives of heritage preservation within the Slinfold Neighbourhood Plan.

## Flood Risk and Drainage

7.65 A Flood Risk Assessment (FRA) and Drainage Strategy has been undertaken by Charles and Associates and accompanies the submission of this application. The report identifies the site as being located wholly within Flood Zone 1 (very low risk of flooding), and the latest EA mapping shows minor areas of surface water flood risk at the site's north-eastern corner.

7.66 The development has followed the sequential approach to the layout and allocation of development within the site. The proposed drainage strategy demonstrates how the development will manage surface water and foul water discharge to ensure the development does not increase flood risk elsewhere. The drainage strategy includes a mix of SuDS features (attenuation basins, geocellular tanks and permeable paving), which will store water before being discharged at restricted rates into an existing watercourse.

7.67 Foul water is proposed to be discharged into the existing public sewer on Hayes Lane

7.68 The FRA and Drainage Strategy concludes that flood risk and surface water management can be controlled appropriately and in accordance with the provisions of the NPPF and Policy 38 of the HDPF.

## Water Neutrality

7.69 On 31 October 2025 Natural England issued a Withdrawal Statement<sup>4</sup> confirming that its Water Neutrality Position Statement of September 2021 has now been withdrawn.

<sup>4</sup> [Arun-Valley-Withdrawal-Statement-31.10.25.pdf](https://www.gov.uk/government/publications/arun-valley-withdrawal-statement-31-10-25.pdf)



7.70 As the competent authority under the Habitats Regulations, HDC has stated on its website<sup>5</sup> that all development from 1<sup>st</sup> November 2025 onwards can now move forward without the need to demonstrate that the site is water neutral as it did previously. This means that no water neutrality statement is required, and no bespoke mitigation, conditions or s106 obligations are necessary to demonstrate water neutrality. The Council has stated that it intends to continue to undertake Appropriate Assessments (in line with the Habitats Regs and NPPF 193) until the reduced water abstraction licence cap at Hardham is implemented by Southern Water in March 2026.

7.71 As such, potable water that is required to serve the proposed 38 homes on this site will be taken from the existing mains supply as was the situation prior to the September 2021 Position Statement. Owing to this change in position, no water neutrality statement is required, nor is it necessary for the applicant to apply for credits under the Council's (now rescinded) SNWCS scheme to demonstrate measures to ensure impact on the integrity of the Arun Valley habitat sites is avoided.

## Energy and Sustainability

7.72 The applicant is committed to providing highly sustainable and energy efficient new homes to meet the requirement of the latest building regulations and reduce householder bills whilst contributing to reducing carbon emissions. The applicant's approach intrinsically follows the energy hierarchy by utilising a fabric first approach in the design and layout of the site. This is achieved by installing energy saving measures, such as those included in the list below, prioritising measures that improve the efficiency of the homes to reduce energy use whilst also reducing costs for future residents.

7.73 By doing this it is expected that the development will result in a reduction in carbon emissions against the latest building regulations targets. This accords with the aspirations of the Council's adopted policies on climate (HDPF policies 35, 36 and 37) which supports proposals that meet the energy hierarchy contribute to achieving zero-carbon development and positively contribute to addressing climate change.

7.74 It is intended that a range of measures will be embedded into the design and function of each new home in order to significantly improve the energy efficiency and carbon footprint of the development as a whole. These measures are likely to include the use of:

- Air Source Heat Pumps
- EV Charging points to each plot
- Photovoltaic Panels (PV)
- Thicker wall cavities
- Water butts
- Water saving devices such as low flow taps and showers to reduce water use to the optional building regulations standards of 110 litres per person per day.

7.75 Full details of the measures to reduce both construction and operational resource and energy use can be set out at the detailed design stage.

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<sup>5</sup> [Water neutrality | Horsham District Council](#)



7.76 It is also important to recognise that the sustainable location of the site coupled with its design, landscaping and layout and measures to encourage walking and cycling are also an intrinsic part of reducing energy use and creating a happier, healthier environment for residents now and in the future.

7.77 Whilst at this Outline stage it is not possible to provide detailed calculations for the energy use of the scheme, as far as is possible at this stage, the above demonstrates the applicant's commitment to achieving high environmental standards as well as compliance with Policies 35, 36 and 37 of the HDPF.

## Mineral Resources

7.78 The 3.9 ha site is in a mineral safeguarding area for brick clay (Weald Clay Formation) where Policy M9 of the West Sussex Minerals Local Plan applies. The safeguarded area for brick clay covers a large part of Northern West Sussex including the majority of Horsham District.

7.79 The application site is constrained by its relatively small size and its proximity to existing residential properties to the north and west. There are various constraints which impede the areas likely to be available for excavation and extraction including important trees around the periphery of the site, and the PROW at the northern boundary. As such, it is considered that prior extraction of this mineral resource is not feasible or practical.

7.80 The need for housing nationally and particularly within Horsham District, as demonstrated elsewhere in this statement, is acute. This need, coupled with the constrained nature of the site for mineral extraction and the widespread abundance of the resource, justifies the development of the safeguarded site for residential use. Consequently, the proposals meet criteria (b) of Policy M9.

## Air Quality

7.81 As the proposals are for more than 10 dwellings and therefore classed as a "major development", an Air Quality Assessment (by Air Quality Solutions) has been submitted with the application in line with HDPF Policy 24.

7.82 The Air Quality Assessment demonstrates that, subject to good practice measures, residual air quality and dust impacts during construction are not significant. In addition, operational air quality impacts are also assessed as not significant due to relatively low number of vehicle movements and the avoidance of use of any combustion plant (gas boilers).

7.83 The Air Quality Assessment proposes a financial contribution of £3,254.98 towards local air quality initiatives to offset residual impacts calculated as a "damage cost". It is envisaged that this would be secured through a legal agreement.

## Planning Conditions / CIL / s106

7.84 NPPF paragraph 57 confirms that planning conditions should be kept to a minimum and only imposed were necessary and relevant to planning and the proposed development. It goes onto confirm that conditions required to be discharged prior to commencement should be avoided unless there is clear justification.

7.85 This Outline application intentionally includes sufficient information to minimise the need for additional conditions beyond those that seek further design details at RM stage. However, where Outline conditions are necessary, the applicant is happy for these to be included in order to make the development acceptable to the Council.



7.86 The proposal is located within the adopted CIL charging zone; therefore, whilst this application is in Outline form and precise development figures are not confirmed, a CIL Additional Information Form accompanies the submission to acknowledge that the development will be CIL liable.

7.87 It is expected that a legal agreement will be required as part of any planning permission. At this stage, it is anticipated that this will cover the following Heads of Terms:

- 13no. Affordable Housing Units (and financial contribution to make up to 35% provision)
- Air Quality Offset Contribution of £3,254.98
- BNG on-site Implementation and Monitoring
- Open space/play provision



## 8.0 Summary and Planning Balance

8.1 At the heart of the NPPF is a presumption in favour of sustainable development. As set out in NPPF Paragraph 8, the planning system has three overarching objectives which are key to achieving sustainable development. These are social, economic and environmental objectives.

8.2 The proposed development would result in **social** benefits through:

- The provision of a mix of 38no. dwellings in a sustainable location and on a site which is already allocated for residential development within the Slinfold NP, to add to the much-needed housing stock in the district, representing a very substantial benefit in the context of the Council's housing supply and delivery position;
- The provision of 13no. on-site affordable housing dwellings (and a financial contribution to make up for the 0.8% shortfall) and a suitable mix of house types and sizes to accord with identified local needs representing a very substantial benefit in the context of the pressing need for housing of all types and sizes;
- Public open space provision and retention and enhancement of existing landscape features for the enjoyment of incoming and existing residents, as well as private outdoor amenity space for each dwelling;
- Re-alignment and improvements to PROW 3782; and
- Provision of new homes in a thriving village, enabling new residents to support the vitality of existing local facilities such as the primary school, local shop, post office, local sports clubs, and village pub; and enjoying convenient connections to the wider recreational routes and strategic highways network.

8.3 The proposed development would result in **economic** benefits through:

- The generation of employment related to construction;
- New Homes Bonus payments and CIL receipts; and
- Contributions to the local economy by future residents.

8.4 The proposed development would result in **environmental** benefits through:

- Retention and enhancement of existing mature planting along the site boundaries (including TPO trees) in order to retain the verdant character of the site and to protect wider landscape views;
- Highways improvements in the form of re-providing 5no. dedicated visitor parking bays at the site entrance to compensate for the loss of informal highways parking on Hayes Lane;
- Provision of ecological enhancement measures, including mitigation measures to prevent harm to sensitive habitats and to achieve at least 10% Biodiversity Net Gain;
- Protection from flooding for the lifetime of the development by utilising sustainable drainage systems which also provide ecological and landscape benefits;
- Careful landscape design to produce a development of the highest quality, ensuring it respects the local area; and



- Design of the homes to meet and exceed current environmental standards, including adopting a fabric first approach and the use of sustainable energy technologies including EV car charging at each dwelling.

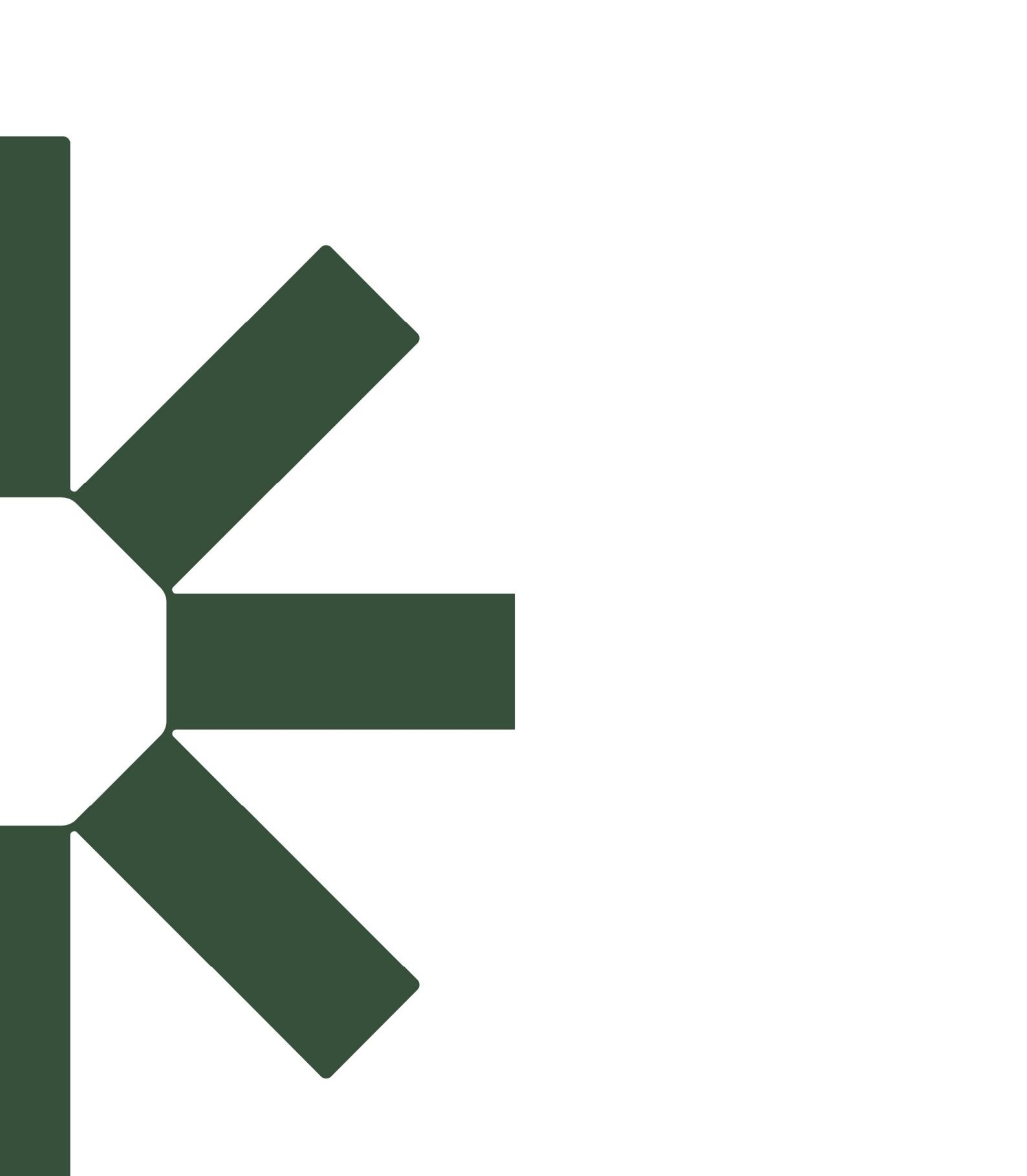
8.5 This statement demonstrates that the proposed development of 38no. homes on this site would deliver multiple benefits, particularly the significant benefit of a mix of much needed housing in a location that is considered to be sustainably located and very well related in character to the surrounding built up area and form of the village.

8.6 The statement has highlighted the significant benefits the proposal would offer and demonstrates that the proposed development would not result in any adverse impacts that cannot be mitigated to an acceptable level.

8.7 The confirmation by the Council that only a 1-year supply of housing is currently being achieved demonstrates the urgent need for housing to be delivered in sustainable locations within the district and triggers the application of the '*tilted balance*'. Not only is the site already allocated for residential development in the Slinfold NP, the development proposal for 38 new homes complies with the provisions of the Council's Shaping Development in the Horsham District PAN and makes the most effective use of the land available whilst creating a beautifully designed place for new residents to live.

8.8 In summary, the benefits that would result from the proposed development are significant, and there are no adverse impacts that would significantly and demonstrably outweigh the delivery of these benefits. As such, having regard to the policies contained within Horsham's adopted development plan, the Slinfold Neighbourhood Plan, as well as direction from the NPPF and other material considerations identified (including the PAN); it is considered that the planning balance lies in favour of the proposal, and it is respectfully requested that planning permission is granted.





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