



Horsham  
District  
Council

## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land West of Bines Road Bines Road Partridge Green West Sussex
<b>DESCRIPTION:</b>	Development of 101 dwellings (including 45% affordable), creation of new access, public open space, creation of a cycle path, allotments, and associated landscaping.
<b>REFERENCE:</b>	DC/25/1922
<b>RECOMMENDATION:</b>	Advice / <del>No Objection</del> / <del>Objection</del> / More Information / <del>Modification</del> / <del>Refusal</del>

### SUMMARY OF COMMENTS & RECOMMENDATION:

The proposal site is located outside the existing settlement boundary of Partridge Green and comprises a development of up to 101 dwellings with open space provision and 45% affordable housing provision.

An application for the same proposal under reference DC/24/1699 at this site was refused by Horsham District Council (HDC) in August 2025. One of the reasons for refusal was the failure to satisfactorily demonstrate water neutrality as part of the development proposals. The other ground for refusal was the incomplete S106. The proposed development has not been accompanied by a completed s106 Legal Agreement, thereby does not secure the 45% of units required to be provided as affordable housing units or other obligations required to make the development acceptable.

On 31 October 2025, Natural England issued a Withdrawal Statement confirming that its Water Neutrality Position Statement of September 2021 has been withdrawn thereby removing the single substantive reason for refusal. DC/25/1922 is identical to the previous scheme apart from minor alterations to the layout and landscape design which were made during the course of the last application to address comments received during the determination process.

The following policy comments look to assess DC/25/1922 on its own merits but there is acknowledgement of the context of the wider history connected with this site.

## **MAIN COMMENTS:**

### **Introduction**

#### Preamble

The proposal site is located outside the settlement boundary of Partridge Green and comprises a development of up to 101 dwellings including 45% affordable housing and associated works. The site abuts the south-eastern edge of the built-up area boundary of Partridge Green. It is noted Land West of Bines Road is not allocated in the HDPF, in the emerging Horsham Local Plan nor is it allocated in the made West Grinstead Neighbourhood Plan.

These comments consider national and local policy (emerging and adopted) that relate to the proposed development. They do not set out advice on every issue that may be of relevance to the proposal and do not reference every policy in its entirety. Instead, the comments focus on the following issues:

- Whether Partridge Green is an appropriate settlement for the quantum of development proposed.
- Whether the proposed housing scheme is acceptable in policy terms against the development plan.

The comments do not discuss the Council's Housing Land Supply position or Housing Delivery Test performance in any detail. However, the case officer will be aware that the 'tilted balance' is effect per NPPF para 11dii) unless it is assessed that the exemptions identified in 11di) and related footnote 7 apply and further information in relation to this is provided in the Shaping Development in Horsham District Planning Advice Note (SDPAN, 2025). In addition, the comments provide no commentary relating to the need for development to be water neutral, to which the case officer will also be aware of the latest position, given the recent statement from Natural England confirming withdrawal of the 2021 Position Statement.

### **Development Plan**

The development plan consists of the Horsham District Development Framework (HDPF, 2015), the West Sussex Joint Minerals Local Plan (2018), the West Sussex Waste Local Plan (2014) and the made West Grinstead Neighbourhood Plan (WGNP - 21 June 2021). The respective Minerals and Waste Local Plans are, to my knowledge, not relevant in this case, but the HDPF and WGNP are. The emerging Horsham District Local Plan (HDLP 2023-40) is a material consideration and is discussed below.

### **Horsham District Local Plan (HDLP) 2023-2040**

The Council submitted the Horsham District Local Plan 2023-2040 (HDLP) to the Secretary of State for examination in July 2024. The HDLP sets out policies and proposals intended to guide development in the district, excluding the South Downs National Park, up to 2040. Examination hearings started in December 2024, but the remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024. On 22 April 2025 the Council published the Inspector's subsequent Interim Findings Letter which has recommended that the Plan be withdrawn, due to his view that the Council has failed to satisfactorily comply with the legal Duty to Co-operate.

The Council wrote to the Planning Inspector on 18 August 2025 requesting that he reopen the examination hearings to revisit his conclusions on the Duty to Cooperate and conduct a further hearing on the matter, that includes representatives of neighbouring authorities, particularly given the context of proposed changes to the planning system (which includes the revocation of the Duty to Cooperate) and local government reorganisation. A response to the letter was received from the Inspector on 28 August 2028 inviting further evidence from the Council.

The Council has again written to the Inspector on the 11 November 2025 providing further evidence relating to Duty to Cooperate and the Council's work with Crawley and invited the Inspector to reopen the examination process. At the time of writing, the Council has received communication from the Inspector dated 28 November 2025. The Inspector has invited the Council to an exploratory/procedural meeting in March 2026 to discuss issues of process and soundness relating to HDLP. The Council will respond accordingly.

It is the Council's view that the submission HDLP remains the emerging Local Plan (eLP) in the context of NPPF para 49 at the time of writing. However, given the context described, it is considered that only limited weight should be given to its policies.

### **Horsham District Planning Framework (2015-31)**

#### **Policy 3: Development Hierarchy (advice)**

HDPF Policy 3 identifies Partridge Green in the 'Medium Village' tier of the development hierarchy. This position is reiterated within Policy 3 of the eLP. Partridge Green has a local shop (Co op), a village hall, a fire station, a primary school, employment areas (Huffwood Estate and Star Road Estate) and a pub. Accordingly, it is considered that Partridge Green is a sustainable settlement and, in general terms, is able to accommodate a modest quantum of development.

#### **Policy 4: Settlement Expansion (advice)**

Strategic Policy 4 of the HDPF support expansion of settlements subject to specified criteria including whether allocated in the Development Plan, settlement hierarchy context and meeting local housing need. Paragraph 5.12 of the SDPAN sets Policy 4 of the HDPF in the context of current circumstances regarding the 'tilted balance' and status of the emerging Local Plan (see below).

#### **Policy 16: Meeting Local Housing Needs (advice)**

The proposed development comprises of 101 dwellings, 46 of which are identified as being affordable. The overall percentage of affordable housing amounts to 45%. Such a quantum exceeds requirements in Policy 16 (3a) of the HDPF of 35% affordable on development providing 15 or more dwellings on-site. It accords with the requirements in the emerging Local Plan.

Policy 16 (i) stipulates development should provide a mix of housing sizes, types and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment (SHMA) in order to create sustainable and balanced communities. As set out in paragraph 6.8 of the HDPF, the Council seeks 70% of affordable homes to be provided as Social Rent or Affordable Rent units, and 30% as intermediate or Shared Ownership units (or other affordable routes to home ownership). The applicant with the submitted Planning Statement (ECE Planning Nov 2025) has indicated their commitment to delivering the 70/30 split in accordance with the SHMA but this should be confirmed through the Council's Housing team and the case officer.

It is noted from paragraph 6.3.2 of the Applicant's Pre-Application Statement the proposed housing mix put forward may differ the SHMA<sup>1</sup> recommended mix. It is understood however, that the SHMA is, in part, dated and that an appropriate mix may differ from that stipulated in the SHMA. The case officer should seek advice from the Council's Housing Team on whether the mix set out in this proposal is acceptable.

### **Shaping Development in Horsham District (SDPAN)**

The Council has produced the Shaping Development in Horsham District (SDPAN) which will be a material consideration in planning applications. The document replaces the previous guidance note Facilitating Appropriate Development in Horsham (FAD). It sets out advice in the context of changes to national planning policy since the adoption of the HDPF, the current housing supply position, and the current situation with the examination of the Horsham District Local Plan 2023-2040. The SDPAN was endorsed at Cabinet on 17 September 2025 but carries limited weight.

Paragraph 5.12 of the SDPAN sets Policy 4 of the HDPF in the context of current circumstances regarding the 'tilted balance' and status of the emerging Local Plan (see below). It advises that the following should be observed for new development proposals:

*The Council recognises that it is likely to receive applications outside of defined BUABs and on unallocated sites as it is unable to demonstrate a five-year housing land supply. Given this position and the principles behind HDPF Policy 4, it will consider positively applications that meet all of the criteria below:*

- 1. The site adjoins the existing settlement edge as defined by the BUAB;*
- 2. The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;*
- 3. The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;*
- 4. The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and*
- 5. The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.*

It is for the case officer to determine whether the criteria have been met. On criterion 1 and 3, it is considered that the site is adjacent to the settlement edge. On criterion 4, it is not thought this proposal would compromise long-term development. Criterion 5 relates to a matter to which advice needs to be sought from specialist officers.

In relation to criterion 2, it is noted that there has been recent development activity in the settlement with numerous medium-sized applications approved on sites proposed to be allocated in the emerging Local Plan. It will be for the case officer to determine whether the cumulative scale of development coming forward is out of proportion with the scale and function of the settlement (medium tier village in the settlement hierarchy).

### **West Grinstead Neighbourhood Plan**

The West Grinstead Neighbourhood Plan (WGNP, 2031) was formally made by Full Council on the 23 June 2021 and forms part of the Development Plan for Horsham District. The WGNP

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<sup>1</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf)

does not allocate any housing or employment in the plan. It follows that the WGNP does not meet the requirements of Paragraph 14 of the NPPF.

It is advised that non-housing neighbourhood plan policies should be afforded equivalent weight as the HDPF. There are several 'aims' which can also be found within the plan. They do not form part of the development plan but reflect the community's desires to address particular issues, and therefore the applicant should be encouraged to take them into account.

These may be a more relevant consideration at the reserved matters stage. The following policies will be of particular relevance to this proposal (note this is not exhaustive):

1. Policy 2: Open Space
2. Policy 4: Green Infrastructure, Existing Trees, Hedgerows, Habitats and Wildlife
3. Policy 6: Broadband
4. Policy 9: Car Parking

#### **Extent of policy comments**

Comments in this response are limited mainly to matters which relate to the principle of development and are not exhaustive. They are intended to aid the case officer's detailed assessment and reporting and are made without prejudice to the recommendation of the case officer. I have not considered the finer details of the proposal and it is for the case officer to assess the merits of the proposal against all relevant policies.

#### **ANY RECOMMENDED CONDITIONS:**

n/a

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<b>DATE:</b>	10 December 2025