

# **ECE Planning**

## **Planning and Affordable Housing Statement**

### **Land South of Broadbridge Heath**

**May 2025**



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Project Name: Wickhurst Green, Broadbridge Heath

Location Land South of Broadbridge Heath, Old Wickhurst Lane, Broadbridge Heath, West Sussex

Client: Vistry Homes

File Reference: P2138

Issue	Date	Author	Checked	Notes
PL1	14.04.2025	R Hoad	C Barker	Initial Draft
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## 1. Introduction

- 1.1. This Planning & Affordable Housing Statement has been produced by **ECE Planning** on behalf of our client, **Vistry Homes** in support of an application for Full Planning Permission for development at Land South of Broadbridge Heath, Old Wickhurst Lane ('the Site'). The description of the proposal reads:

*'Full Planning Application for the erection of 89no. residential dwellings comprising dwellings (54no.) and apartments (35no.), 36% affordable homes, creation of new vehicular access on to Sergeant Way, provision of public open space, landscaping and drainage solutions'.*

- 1.2. The Applicant has previously undertaken Pre-Application discussions and a meeting with Horsham District Council which culminated in a response dated 17 December 2024 (reference PE/24/0234). Refer to Appendix A for the Pre-Application response. The Applicant alongside SECNewgate, has also carried out consultation with the Parish Council; feedback from this consultation has also helped to inform the current layout.
- 1.3. Following feedback from the meetings and written response from the LPA, the Applicant Team submitted amendments to HDC via email dated 4 April 2024. At the time of writing this Statement, a response from HDC has not been received. This submission therefore seeks to address HDCs initial comments dated 17 December 2024 in further detail.
- 1.4. In addition to the above, this Statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the planning history, the relevant planning policy, details of the proposed development and an assessment of relevant planning conditions.
- 1.5. The proposals have also been informed by the National Planning Policy Framework, the Planning Practice Guidance, and local planning policy.
- 1.6. This Planning Application should be considered with full regard to the following suite of supporting documents, drawings, and plans:
- **Planning Application Forms, Notices and CIL Forms**
  - **Planning and Affordable Housing Statement**
  - **Statement of Community Involvement**
  - **Architectural Plans and Drawings including Location Plans and Landscape Drawings**
  - **Design & Access Statement**
  - **Flood Risk Assessment and Surface Water Drainage Statement**
  - **Topographical Survey**
  - **Ecological Assessment and Biodiversity Net Gain Impact Assessment and Calculations**
  - **Arboriculture Assessment and Tree Survey**
  - **Transport Assessment and Parking Calculations**
  - **Air Quality Assessment**
  - **Noise Assessment**
  - **Archaeology Assessment and Heritage Assessment**
  - **Sustainability and Energy Statement**
  - **Land Contamination Assessment**
  - **Water Neutrality Statement**

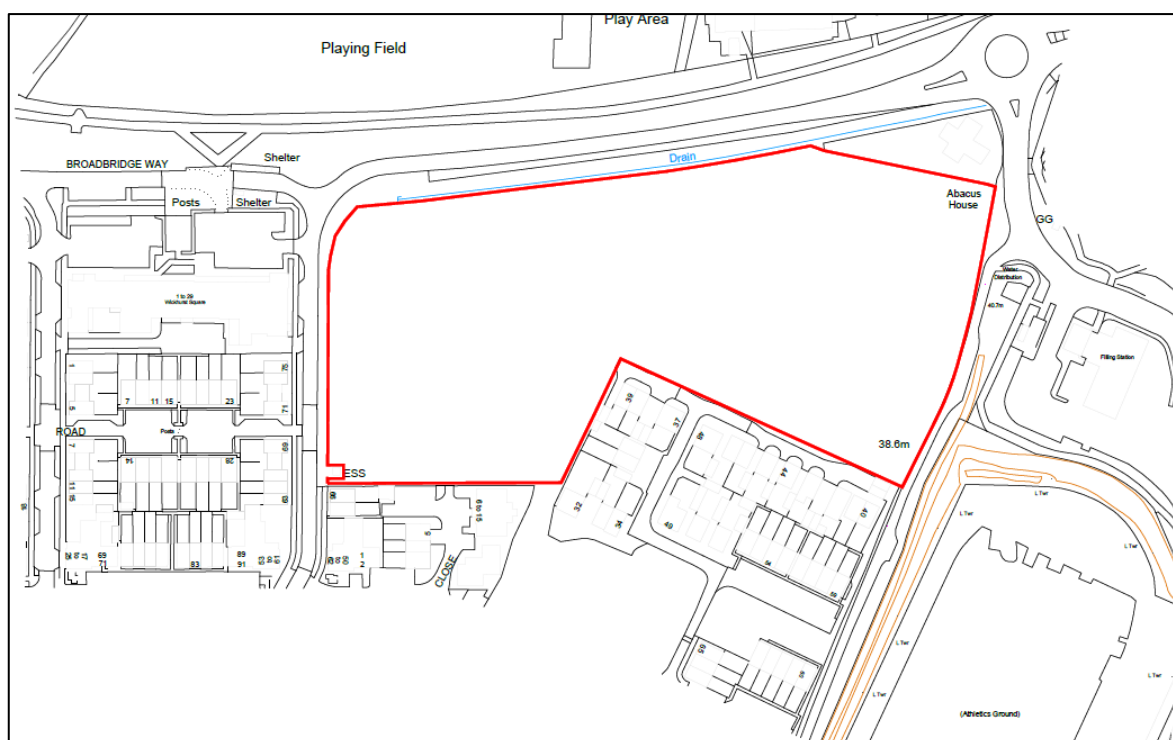
## 2. The Site

- 2.1. In October 2011, Outline Planning Permission was granted (under application reference DC/09/2101) for the development of 57 hectares of land to the South of Broadbridge Heath which forms part of the strategic development of land as set out in the Horsham District Council: Land West of Horsham Masterplan.
- 2.2. The Outline permission is for a development of 963no. residential units, community facilities including land for primary school, neighbourhood centre, youth and recreational facilities, other formal and informal open space, landscaping and environmental works, transport and access arrangements, new east-west link road, improvements to Five Oaks roundabout, realignment and partial closure of existing A264 Broadbridge Heath by-pass and other ancillary works.
- 2.3. This Site is located to the far north east corner of the strategic allocation, and was previously earmarked for a new Primary School as illustrated in Figure 1.



**Figure 1 - Illustrative Masterplan (reference DC/09/2101)**

- 2.4. Since receiving Outline consent, the Local Education Authority has advised that this land is no longer required to deliver a new Primary School. As discussed with the Council, the Site would therefore be appropriate to accommodate housing to help meet Horsham District Council's housing needs.



**Figure 2 - The Site (Red Line Boundary)**

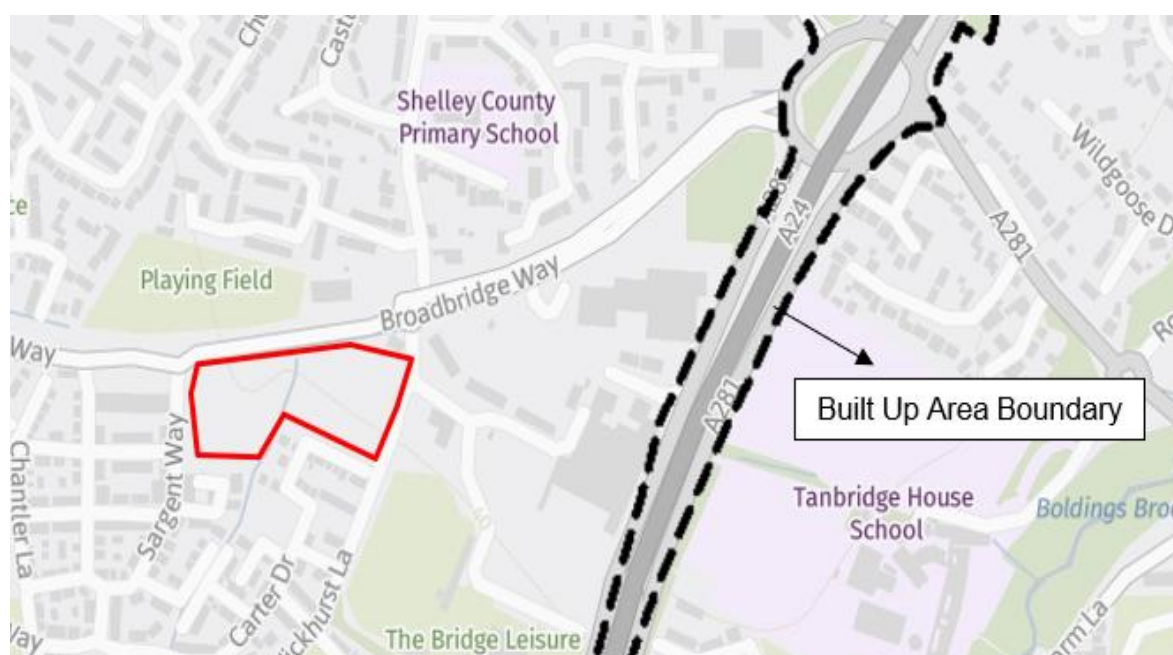
- 2.5. The Site is bound to the north by Broadbridge Heath Way, and beyond Wickhurst Lane/Old Wickhurst Lane to the east by a commercial trading estate and business park, a Tesco Petrol Station and car wash, and a sports pitch associated with Broadbridge Heath Leisure Centre.
- 2.6. The Site is currently vacant and comprises 2 fields, separated by a semi mature tree line and comprising species poor grassland and varying ruderal habitat. There is no current vehicular access.
- 2.7. There is a drainage ditch on the northern boundary and a man-made bund transecting the site east to west. There are established tree belts along part of the northern and eastern boundaries and along a field boundary running north to south through the Site.
- 2.8. Mill Lane bridleway runs north-south to the west of the site and provides a pedestrian and cycle route between the Broadbridge Heath village to the north and the countryside to the south. A public footpath is also located to the east of the site. Refer to Figure 3 below.





**Figure 3 - Public Right of Way Map**

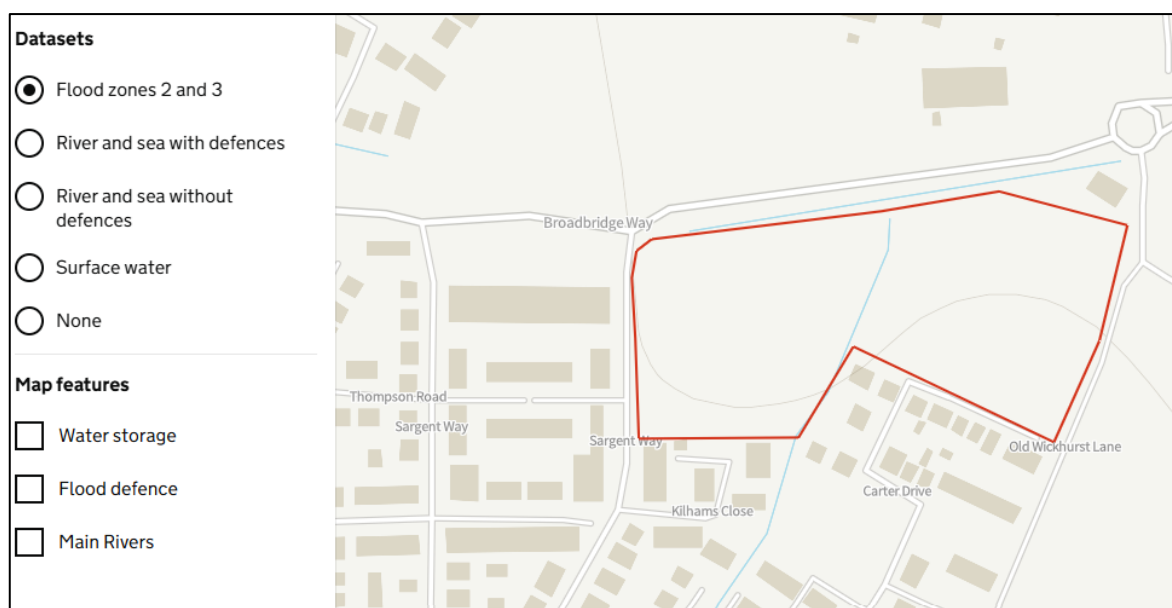
- 2.9. The site is located within a highly sustainable location (within the built up area boundary), with a number of bus stops situated along Old Wickhurst Lane (circa 300m to the south of the site). The nearest train station, Horsham Train Station, is situated circa 2.9 miles to the east of the site. The site is clearly very well connected to the local and wider area, including regular services to London, Brighton and Portsmouth.



**Figure 4 - Built Up Area Boundary**

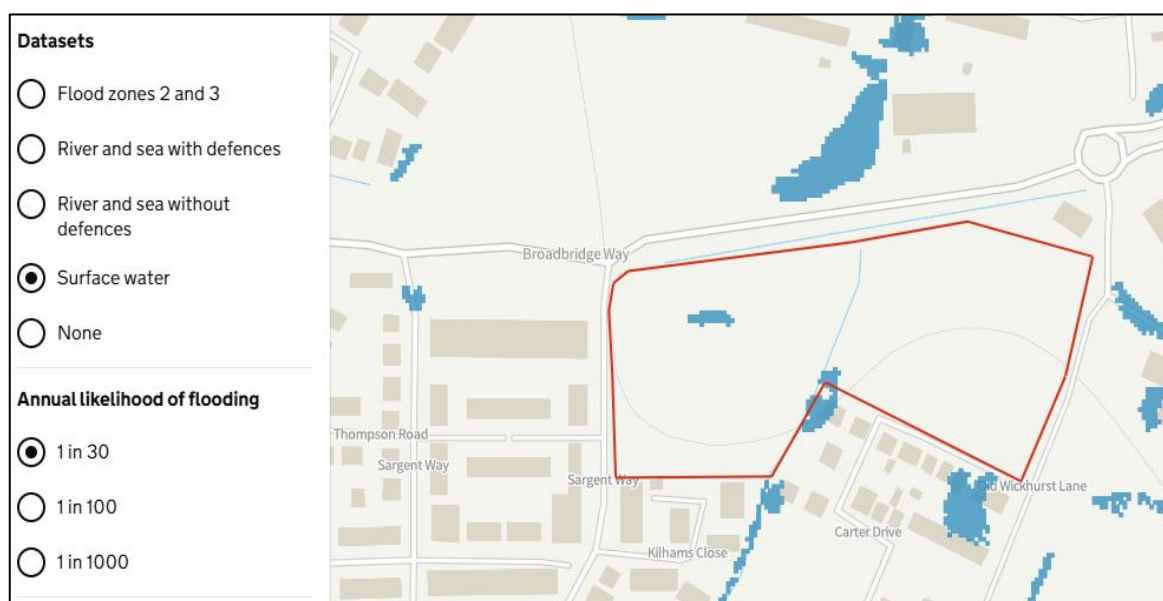
- 2.10. The Government's Flood Maps for Planning have been reviewed and reveals that the Site is entirely within Flood Zone 1 which means that the land has a low probability of flooding (refer to Figure 5). The site is also not at risk from 'river and sea without or with defences'.





**Figure 5 - EA Flood Map for Planning – Flood Zones**

- 2.11. In terms of surface water flooding, the site is predominantly at no risk, with some very small patches at risk of flooding on the far eastern corner and to the south of the site. The annual likelihood of flooding (1 in 30) can be seen below at Figure 6, and the 1 in 1000 risk can be seen below at Figure 7.



**Figure 6 - EA Flood Map for Planning – 1 in 30 Annual Likelihood of Surface Water Flooding**

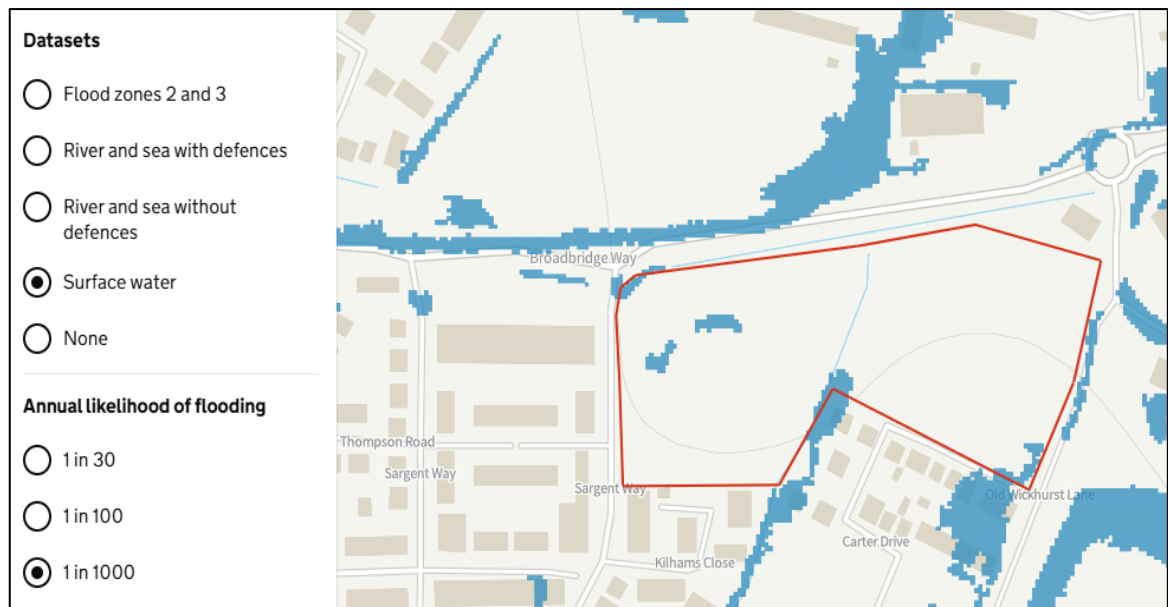


Figure 7 - EA Flood Map for Planning – 1 in 1000 Annual Likelihood of Surface Water Flooding

## 3. Planning History

3.1. A review of the Horsham District Council online register reveal the following relevant planning history pertaining to the site and immediate area.

### 3.2. The Site's Planning History

#### Pre-Application Discussions

3.2.1. **Pre-Application Advice and Meeting Request for the 'Development of up to 80 residential units'.**

3.2.2. As set out previously, the Applicant has previously undertaken Pre-Application discussions and a meeting with Horsham District Council which culminated in a response dated 17 December 2024 (reference PE/24/0234). Refer to Appendix A for the Pre-Application response.

3.2.3. The pre-application response was based upon the site layout illustrated in Figure 8.



**Figure 8 - Pre Application Site Layout Submitted Under Reference PE/24/0234**

3.2.4. The feedback received from HDC is discussed in detail within this Statement. The main matters raised are summarised below:

- Principle of development in this location is supported due to sustainable location.
- Affordable housing provision needs to reflect the policy requirements at the time of submission.
- A review of the housing mix is encouraged. Significant greater demand for 3-bed affordable rent homes than 1 or 2 bed affordable rent homes. Notable under provision of AH 3-beds and overprovision of AH 2-beds and market housing 3-beds.

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- Concern raised with regards to design and layout in terms of density and number of proposed dwellings. LPA encourage higher density of development on the site.
- Important for community benefits to be provided alongside any residential scheme in this location in the form of affordable housing and possible linkages to the open space and facilities to the north of the site.
- Location of the pump station at the site access not supported.
- The colour palette and finishing materials should reflect the existing, neighbouring development.
- Any submission should also include clearer pedestrian access to rear gardens and boundary treatments.
- Consideration to adjacent residential properties needs to be given in terms of potential impact from scale and massing, overlooking, and loss of light and privacy.
- Pedestrian crossings off Broadbridge Way suggested (x2) to provide connectivity to the park and pre-school as can help slow down traffic and improve pedestrian connectivity.
- Liaison with the Parish Council recommended.
- LPA queried whether it would be possible to divert the main traffic off Broadbridge Way through the site. WSCC Highways liaison encouraged.
- No concerns with regard to the proposed access of Sargent Way.
- Quantum of parking appears acceptable and well located in proximity to dwellings. If increased quantum of dwellings is possible then LPA recommend exploring grouped parking and parking courts but use of trees/landscaping to visually break up the mass.
- Application submission needs to include details of cycle parking, EV charging points and bin storage.
- Parts of the site are located within the Amber Impact Risk Zone for Great Crested Newts and located within the supporting area for bats.
- LPA encourage retaining and protecting trees where possible.
- An application will need to be accompanied by Biodiversity Net Gain and a Water Neutrality solution.
- Important that any proposed development remains located outside of areas of low surface water flood risk to avoid the need for a sequential test,

3.2.5. The above matters have been taken in to full consideration in the preparation of this application and a follow up email was sent to HDC on 4 April 2025 to seek to address some of the matters raised, particularly with regards to density / quantum. This is explored in further detail in Section 6 of this Statement.

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- 3.2.6. In addition to the above, the Applicant alongside SECNewgate, has also carried out consultation with the Parish Council; feedback from this consultation has also helped to inform the current layout. Please refer to the accompanying Statement of Community Involvement for further information.
- 3.2.7. Discussions have also been carried out with WSCC Highways and summarised within this Statement and accompanying documentation.
- 3.2.8. To conclude, the current proposed site plan is considered to address the matters raised during the pre-application process. Please refer to Section 6 of this Statement for further information.

## **Planning Applications**

- 3.2.9. The relevant site planning history is detailed below,
- 3.2.10. **Reference DC/09/2101. Erection of 963 residential units, community facility including land for a primary school, neighbourhood centre, youth and recreational facilities, other formal and informal open space, landscaping and environmental works, transport and access arrangements, new east-west link road, improvements to Five-Oaks roundabout, realignment and partial closure of existing A264 Broadbridge Heath by-pass and other ancillary works (Outline). Approved 03 October 2011.**
- 3.2.11. The above application, sought outline consent for the new primary school site which this application relates to.
- 3.2.12. **Reference DC/11/2059. Details of the first phase infrastructure works pursuant to outline DC/09/2101, comprising details of new roundabout on Five Oaks Road, western part of the 40mph dual carriageway from Five Oaks Road to the new A24 junction, on site development roads to serve the first residential phases, Pegasus crossing and pedestrian/cycle crossings, new access to Newbridge Nurseries, access to Heath Barn Farm site, bus stops, foul pumping station and surface water drainage (Approval of Reserved Matters). Approved 15 June 2012.**
- 3.2.13. **Reference DC/11/2074. Development of 105 residential units, including 21 affordable housing units, open space, internal circulation routes, landscaping and associated works pursuant to outline permission DC/09/2101 (Approval of Reserved Matters). Approved 26 June 2012.**
- 3.2.14. **Reference DC/12/1255. Details of second phase infrastructure works pursuant to outline application DC/09/2101 comprising the eastern section of the 40mph dual carriageway from a point east of the traffic light junction (i.e. the boundary of the first phase infrastructure application) to the new A24 junction to include footpaths, grass verges, acoustic treatment and planting in part of the central; refuge; the western section of the new A24 junction; on site development roads needed to serve the remaining residential phases; surface water drainage system including balancing attenuation features and below ground storage; associated foul drainage recreational open spaces, earthworks and services. Approved 30 January 2013.**
- 3.2.15. **Reference DC/12/2202. Approval of reserved matters for the erection of 320 residential units (256 private and 64 affordable housing units) comprising 101 x 2-bed, 165 x 3-bed and 54 x 4-bed houses/flats, landscaping, highways, parking and associated works pursuant to approved outline planning application DC/09/2101 (Erection of 963 residential units and other associated development). Approved 27 June 2013.**

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- 3.2.16. **Reference DC/13/1690. Development of 136 residential units, including 27 affordable (20%), the creation of public and private amenity space, incidental open space, internal circulation routes, landscaping and associated works pursuant to outline application DC/09/2101 (Approval of Reserved Matters). Approved 22 April 2014.**
- 3.2.17. **Reference DC/14/0109. Erection of 70 residential units, including 14 affordable units (20%) with associated access, parking, landscaping and internal circulation routes, pursuant to outline application DC/09/2101 (Approval of Reserved Matters). Approved 27 June 2014.**
- 3.2.18. The above application follows the Outline consent in which the land earmarked for a new Primary School relates to. The 70no. residential units have since been built out.

## **3.3. Surrounding Planning History**

- 3.3.1. The relevant surrounding planning history is detailed below,
- 3.3.2. **Reference DC/16/2700. Development of Broadbridge Heath Sports Facilities including pavilion building, sports pitches and a skate park. Approved 10 February 2017.**
- 3.3.3. **Reference DC/23/1133. Demolition of existing buildings, erection of two retail units (Class E(a)), a drive-thru coffee shop (Class E(b)) and drive-thru restaurant (Sui Generis) with associated parking, access, servicing, signage, landscaping and offsite habitat creation. Awaiting decision.**



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## 4. The Proposal

- 4.1. This application seeks full planning consent for the erection of 89no. residential units including 36% affordable homes on Land South of Broadbridge Heath, Old Wickhurst Lane. The proposed accommodation schedule can be seen below:

Affordable					
Code	Name	Bedrooms	Area (sqft)	Units	Total Area (sqft)
1B2PF AFF	1B2P Apt	1	546	9	4,914
1B2PF M4(3) AFF A	1B2P M4(3) Apt A	1	660	1	660
1B2PF M4(3) AFF B	1B2P M4(3) Apt B	1	753	1	753
2B3PF AFF	2B3P Apt	2	660	2	1,320
2B4PF AFF	2B4P Apt	2	753	14	10,542
M231B0 AFF	231	2	797	1	797
M242B1	242	2	855	0	-
T352B0	352	3	1012	2	2,024
M452B6	452	4	1178	2	2,356
Totals				32	23,366

Sales					
Code	House Type	Bedrooms	Area	Units	Total Area (sqft)
1B2PF	1B2P Flat	1	546	3	1,638
2B3PF	2B3P Flat	2	660	2	1,320
2B4PF	2B4P Flat	2	753	3	2,259
M231B0	231	2	797	3	2,391
T236B1	236	2	827	2	1,654
M241B1	241	2	855	18	15,390
M341B1	341	3	948	10	9,480
M351B1	351	3	1031	2	2,062
M354B0	354	3	1172	6	7,032
M355B0	355	3	1172	3	3,516
M361B6	361	3	1126	3	3,378
M451B0	451	4	1178	2	2,356
Totals				57	50,120

Grand Total				89	73,486
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Figure 9 - Proposed Accommodation Schedule – Affordable Units (Top) and Market Units (Bottom)

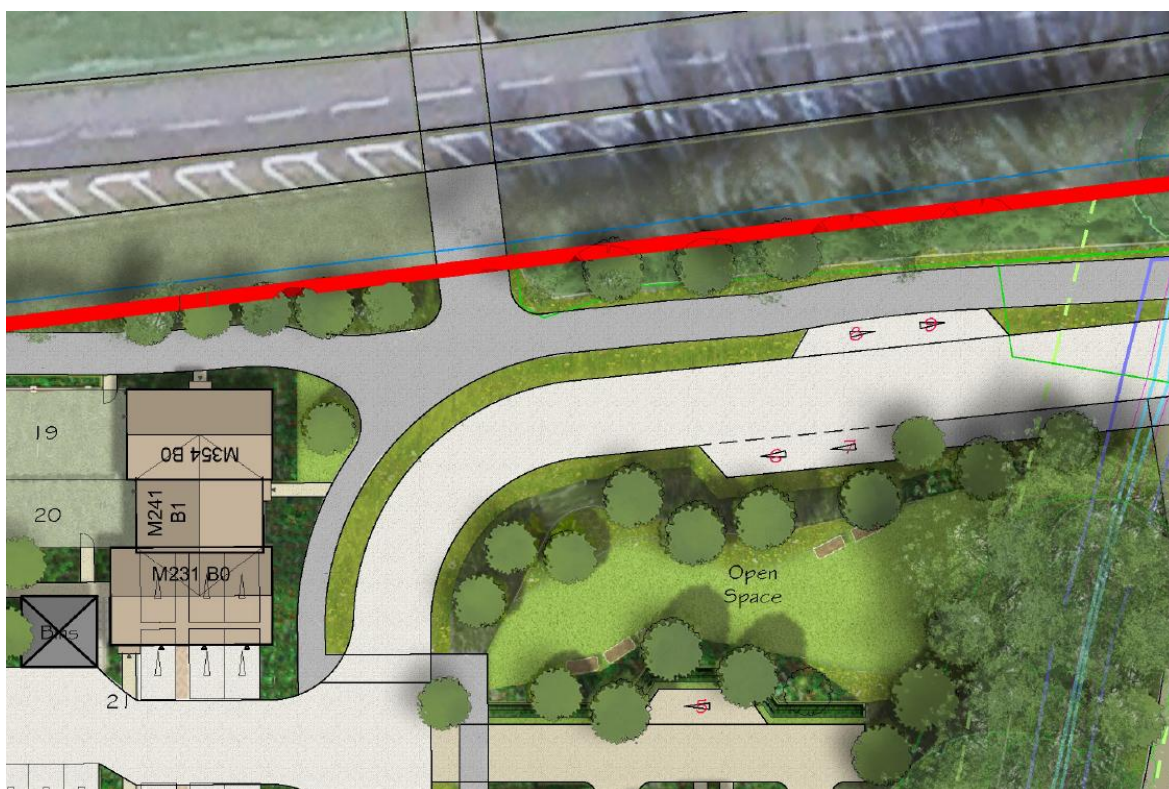
- 4.2. The proposed site plan can be seen below in Figure 10. As explored in further detail in Section 6 of this Statement, it is the Applicant Team's view that the proposed density has been pushed as far as possible and responds fully to the site's context with existing development and provides the necessary infrastructure / car parking provision etc. In this respect, the development seeks to accommodate 89no. dwellings with the affordable units 'pepper-potted' throughout the site to ensure inclusion.



**Figure 10 - Proposed Site Plan**

- 4.3. The site currently does not benefit from site access. As such, the proposals seek to achieve vehicular access from the west of the site, on to Sergeant Way. This would result in the removal of a parking bay which is estimated to accommodate circa 3no. car parking spaces. As such, these parking spaces will be re-provided within the scheme.
- 4.4. Please refer to the accompanying Transport information for details on car parking provision within the site. Cycle spaces would be provided within garden stores located in the rear gardens of the dwellings. For the flat units, communal cycle sheds have been provided within the parking courts. Please refer to the accompanying Transport Statement for further information.
- 4.5. Areas for the storage of refuse have been provided throughout the scheme as illustrated in the accompanying Site Plan. For the flat blocks, the refuse stores are located close to the parking areas.
- 4.6. The proposed site plan seeks to accommodate an area of open space within the centre of the site, to the west of the existing tree line running north-south. The open space would be well surveyed by Plots 19-20 and 53-55. To the north of the open space, a large pedestrian/cycle connection has been proposed to allow connectivity to the park and facilities to the north of the site.





**Figure 11 - Proposed Area of Open Space and Connectivity to the North**

- 4.7. The Design & Access Statement further sets out details of the proposed materials to be used on the new buildings. In summary a range of materials will be optimised including red brick, dark red multi brick, reconstituted slate roof tiles, white boarding, black boarding, tile hanging and brown roof tiles.
- 4.8. The proposed dwellings will comprise two storeys in height whilst the flat blocks will comprise three storeys. An example streetscene can be seen below.



**Figure 12 - Streetscene Drawing of Proposed Dwellings**



**Figure 13 - Streetscene Drawing of Proposed Flat Blocks**

- 4.9. As set out in the accompanying drawings, soft landscaping has been proposed to the scheme where possible in order to enhance the visual amenity of the site and to assist with biodiversity net gain which will ultimately be achieved via off-site credits. This is discussed in later sections of this Statement and in accompanying Reports.

## 5. Policy Overview

### 5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Horsham District Planning Framework (2015).
- 5.1.3. The National Planning Policy Framework (The Framework), the Planning Practice Guidance (PPG) and Supplementary Planning Guidance are material considerations, together with local guidance documents.
- 5.1.4. It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years and therefore the Council are currently in the midst of preparing a new Local Plan for the District. Please refer to the below paragraph for further information.

### 5.2. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19 Version)

- 5.2.1. The Regulation 19 Local Plan has been published for a six week period of representation from 19 January 2024 to 1 March 2024. The Regulation 19 Local Plan has since been formally submitted to the Planning Inspectorate on 26 July 2024 and the examination hearings commenced in December 2024.
- 5.2.2. At the time of writing this Statement, the Local Plan hearings have been cancelled by the Inspector due to *'significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas'*.
- 5.2.3. On 7 April 2025, a Letter was published by the Inspector which recommended to Horsham that the Local Plan should be withdrawn from examination and a new Local Plan should be prepared.
- 5.2.4. We understand that Horsham are in the midst of responding to this Letter but as it currently stands, the Regulation 19 version of the Local Plan has been withdrawn and is not considered to hold any weight in the determination of this application.

### 5.3. National Planning Policy Framework (NPPF)

- 5.3.1. The NPPF was adopted in 2012 with many revised versions, the most recent of which being updated in February 2025.
- 5.3.2. As explored in further detail later in this Statement, the National Housing Target has recently been increased from 300,000 new homes a year to 370,000 new homes a year. As a result, the NPPF has been heavily updated to try and boost the delivery of housing to try and meet the newest target.
- 5.3.3. The relevant sections of the NPPF in relation to this application are summarised below and explored in further detail later in this Statement.

- **Section 2 - Achieving sustainable development**
- **Section 5 - Delivering a sufficient supply of homes**
- **Section 7 - Ensuring the vitality of town centres**
- **Section 8 - Promoting healthy and safe communities**
- **Section 9 - Promoting sustainable transport**
- **Section 11 - Making effective use of land**
- **Section 12 - Achieving well-designed places**
- **Section 14 - Meeting the challenge of climate change, flooding and coastal change**
- **Section 15 - Conserving and enhancing the natural environment**
- **Section 16 - Conserving and enhancing the historic environment**

## **5.4. Planning Practice Guidance (NPPG)**

- 5.4.1. The PPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework. The guidance provided by the PPG has been fully considered in the creation of this application and the proposed development is seen to be fully compliant with it.

## **5.5. Horsham District Planning Framework (2015)**

- 5.5.1. The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District outside the South Downs National Park (SDNP) and replaces the Core Strategy and General Development Control Policies documents which were adopted in 2007.
- 5.5.2. Although the HDPF is out of date by reason of it being over 5 years old, the following policies are considered to be relevant to the application and have been given full consideration in the preparation of this application.

- **Policy 1 - Strategic Policy: Sustainable Development**
- **Policy 2 - Strategic Policy: Strategic Development**
- **Policy 3 – Strategic Policy: Development Hierarchy**
- **Policy 15 - Strategic Policy: Housing Provision**
- **Policy 16 - Strategic Policy: Meeting Local Housing Need**
- **Policy 24 - Strategic Policy: Environmental Protection**
- **Policy 25 - Strategic Policy: The Natural Environment and Landscape Character**
- **Policy 26 - Strategic Policy: Countryside Protection**
- **Policy 31 - Green Infrastructure and Biodiversity**
- **Policy 32 - Strategic Policy: The Quality of New Development**
- **Policy 33 - Development Principles**
- **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**

## **5.6. Supplementary Planning Documents**

- 5.6.1. The following documents have been considered in the preparation of this application:



- **West of Horsham Masterplan Supplementary Planning Document (2008)**
- **Land West of Horsham Design Principles and Character Areas (2009)**

## **5.7. Community Infrastructure Levy (CIL)**

- 5.7.1. CIL was adopted by HDC in October 2017 and is a charge placed on new development. In accordance with the adopted CIL Charging Schedule, residential development in Broadbridge Heath (Zone 1) is charged at £184.56 per sqm plus indexation.

## 6. Planning Appraisal

### 6.1. Introduction

6.1.1. The principal issues in relation to this development are as follows:

- Principle of Development
- Layout and Density
- Housing Mix and Affordable Housing
- Design, Form and Appearance
- Residential Amenity
- Access, Transport and Parking
- Ecology and Biodiversity Net Gain
- Trees
- Landscaping
- Sustainability
- Drainage
- Air Quality
- Noise Impact
- Archaeology
- Land Contamination
- Water Neutrality

### 6.2. Principle of Development

- 6.2.1. The site was originally reserved for a primary school for a period of five years, as permitted under reference DC/09/2101, however, the education authority has determined that the school is no longer needed on this site and are therefore not progressing with the land transfer.
- 6.2.2. As discussed with Horsham District Council, the Applicant is therefore looking to provide 89no. residential units on this parcel of land, now it has been confirmed that the education authority no longer require the proposed school.
- 6.2.3. Policy 3 of the adopted Local Plan (Horsham District Planning Framework dated 2015) states that *'development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement'*.
- 6.2.4. The site lies within the designated built-up area of Broadbridge Heath which is categorised as a "Small Town and Larger Villages" within Policy 3 of the Local Plan. The site therefore forms part of an existing settlement where development proposals that are of an appropriate nature and scale and maintain characteristics and function of the settlement are considered acceptable. There is a presumption in favour of sustainable development within the built-up area, and as such, the proposal is considered acceptable in principle, subject to all other material considerations.
- 6.2.5. The above has further been confirmed by HDC in the pre-application response (reference PE/24/0234) as set out below:

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*'The site is located within the Broadbridge built-up area boundary and is a sustainable location with good active travel connections. As such the principle of development in this location is supported in accordance with policy 2 and 3 of the HDPF and the West of Horsham Masterplan DPD subject to other policy criteria being met.'*

6.2.6. Further to the above and as confirmed in the pre-application response, HDC cannot currently demonstrate a 5 year housing land supply. As confirmed by HDC's recently published Housing Delivery Test Action Plan dated April 2025, HDC are only able to demonstrate a **1-year supply** of housing, therefore representing a very significant under provision.

6.2.7. In addition to the above, Appeal reference APP/Z3825/W/24/3346736 (which was determined prior to the 1-year supply of housing announcement) identified that the Council has a housing delivery test at a rate of 62%.

6.2.8. As a result of HDC's significant under supply of housing, Paragraph 11(d) of the NPPF is engaged which states that:

*'d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance<sup>7</sup> 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<sup>9</sup>.'*

6.2.9. Footnote 8 of Paragraph 11(d) notes that a development plan policy is considered out of date where:

*'This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 232.'*

6.2.10. Development of this land should therefore be recognised as a very valuable contribution towards the District's significant housing need.

6.2.11. In addition to the above, Paragraph 62 of the NPPF states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.'* The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for. Within the most recent policy changes, the Government will take forward the proposals to introduce a new standard method that uses housing stock to set a baseline figure. The method will use 0.8% of existing stock as the baseline.

- 6.2.12. As noted in the Government's consultation, over the last 10 years housing stock has grown nationally by around 0.89%. Setting a baseline of 0.8% provides a consistent base for growth, which is then increased to reflect housing affordability pressures, setting ambitious expectations across the country while directing housing to where it is most needed.
- 6.2.13. Horsham's current housing need does not take into account the new standard methodology and therefore provides yet another reason that the presumption in favour of residential development on this land should be considered acceptable given the fact that the District has a severe unmet need.
- 6.2.14. To conclude, the principle of development for 89no. units on this land is considered to be entirely acceptable. The site is located in a highly sustainable location with good active travel connections and therefore is an appropriate location for development. Horsham have a significant housing need which the proposed development would significantly contribute towards.
- 6.2.15. The matter of density and quantum is discussed in further detail in Section (6.3) of this Statement.

## 6.3. Layout and Density

- 6.3.1. As set out within this Statement and Appendix A, it is clear that HDCs main concern with regards to the proposals is in terms of design and layout around density and number of proposed dwellings.
- 6.3.2. Following on from the pre-application response, the Applicant Team have explored this matter in great detail and a follow up email was sent to HDC by Chris Barker on 4 April 2025. This is set out below for ease of reference:

*'Dear Adrian, Barbara*

*We are writing to you in response to the attached email dated 10 March 2025, as Stephanie is now on maternity leave.*

*Firstly, we thank you for your email, the content of which is noted.*

*We do however want to respond to your comments relating to our scheme being at a 'lower density' than the existing neighbourhood areas.*

*As set out previously, we have designed our scheme to respond fully to the adjoining Neighbourhood Centre as well as responding to the lower density developments to the north, east and south of our site. The site was identified for a school and therefore the expectations of density are clearly not directly correlated to 'place making' through scale and mass as the provision of a school would clearly be differential due to its usage.*

*We therefore sought to produce a scheme that responded more to its context, as set out in the West of Horsham Design Principles SPD. The SPD, relating to the 'Neighbourhood Centre' clearly requires any scheme to respond to its context and the village location.*

*'It is anticipated that development of this character area would be more urban in form whilst respecting the village location by sensitive design. Buildings may be up to three storeys in height and could include flats or offices above shops; buildings comprising flats and 3 storey houses in terraces. A landmark building would be appropriate and would add to the impression of creating a focus for the development. Densities of up to 60 - 65 dwellings per ha may be acceptable subject to the overall scale, height and design of buildings being appropriate. **This is an upper limit, not a target in our view.'***

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*In reviewing our proposals in context, it is clear that the principal element of the Neighbourhood centre lies to our west, with the 3 storey flats with retail below, lying adjacent to one, two and three storey buildings as shown below;*



**Figure 14 - Existing Development on Sergeant Way Photo 1**



**Figure 15 - Existing Development on Sergeant Way Photo 2**

*Our scheme is therefore considered to respond in a similar manner, with the highest, three storey buildings and density focused opposite the mixed-use element of the adjacent site. The development scale and density then reduces away from this corner in direct response to the neighbouring developments to the north, south and east of the site. The attached density study shows that our scheme responds directly to the developments that physically adjoin our site.*

*Our **western parcel**, including our open space area provides for a density of 61.8dph, adjacent to the green area which provides for a combined density of 56.4dph. The development identified in blue immediately south of this plot indicates a development density of 62dph. The western parcel is therefore reflective of the local densities at the core of the 'Neighbourhood Centre'.*

*Our eastern parcel has been designed to respond to the lower-level residential housing within Carter Drive (43.8dph) as shown below as well as the lower density development around Thelton Avenue to the north of the bypass (purple area at 36.4dph).*





*Figure 16 - Dwellings in Carter Drive*



*Figure 17 - Dwellings in Carter Drive*

*Our density diagrams do not include for public open spaces or allow for offsetting from trees etc as the schemes are built out. The densities presented therefore for the 'as-built' developments are higher than if we had included open space or allowed for constraints.*

*Our eastern parcel at 39.5dph is considered therefore to respond appropriately to its context, aligning fully with the SPD in responding to the village character of the area and rural context of Wickhurst Lane to the east of the site. We must also consider that access to the site can only be provided from the western parcel, which restricts the developable area, as Carter Drive cannot provide a two-sided street due to its limited width and poor alignment in the context of current highways guidance.*

*We are strongly of the view that we have struck the right balance in density and design terms, responding fully to the site's context with existing development, whilst focusing attention to the 'Neighbourhood Centre' through the complementary addition of three storey flat blocks on the corner of Sargent Way and Broadbridge Way.*

*The SPD provides guidance with an upper limit on densities at between 60-65dph, which must be considered in context and cannot be a target to achieve at the expense of appropriate, contextual design.*

*We will therefore be proceeding with our scheme for 89 units on the basis that we consider it does make effective use of land, responding fully to its context with existing development.*



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*We must also draw attention to the fact that Registered providers do not want more than 30% of any obligated or non-obligated (offer of additionality) units to be flats. We are therefore very aware that any increase in unit numbers would be to deliver increased numbers of flats on site, which in our view is counterintuitive, when we have clear guidance from HDC housing officers and RPs that the more than 30% flats would not be welcomed as part of any affordable housing product offer.*

*As requested by HDC, we have exhausted pushing the quantum of apartments, currently at 44% (including FOGs), to its maximum that no Registered Providers would be interested in proceeding if we increased this any further and therefore making the proposal unviable as the design is no longer market facing.*

*Our discussions with the Parish Council have also been broadly receptive to the layout, density and form of development proposed. Any increases to unit numbers will only seek to undermine the positive work undertaken to date by exacerbating concerns relating to any additional housing in the locality.*

*In conclusion, we are strongly of the view that we have struck the right balance in delivering a mix of flats and housing that responds to both the local context in design terms and the housing market more generally in providing a viable and deliverable affordable housing product.*

*We trust that our comments are clear, yet if you have any queries, please let us know.*

*We look forward to hearing from you on your views on this matter.'*

6.3.3. The density plan as referred to in the above email can be seen below:



Figure 18 - Density Study Plan

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- 6.3.4. In conclusion and as set out within the email, we are strongly of the view that we have struck the right balance in delivering a mix of flats and housing that responds to both the local context in design terms and the housing market more generally in providing a viable and deliverable affordable housing product. We look forward to discussing further with the LPA.

## 6.4. Housing Mix and Affordable Housing

- 6.4.1. As set out within the pre-application response (reference PE/24/0234), affordable housing provision will need to reflect the policy requirements at the time of submission. As set out within Section 5 of this Statement, the emerging Local Plan has not yet been adopted and as such, the current HDPF takes precedent in determining the affordable housing provision. Under the HDPF this would be a minimum 35% AH, with 70% of such housing to comprise Affordable Rent and the remaining 30% intermediate housing.
- 6.4.2. The proposed development seeks to provide 32no. affordable homes which equals 36%. The proposals would therefore be in accordance with the HDPF.
- 6.4.3. In terms of tenure, the proposals would seek to provide 70% of the AH to comprise Affordable Rent and the remaining 30% intermediate housing / shared ownership. The proposals would therefore conform with the HDPF.
- 6.4.4. It is noted that the pre-application response states the following in terms of housing mix:

*'The Council's Strategic Housing Market Assessment provides an indicative mix of housing sizes that development should provide, however please note that the latest evidence from our housing team is that there is a significantly greater demand for 3-bed affordable rent homes than 1 or 2 bed affordable rent homes. It is also recommended engaging early on with an affordable housing provider to help inform the AH requirements and design for this site. It is noted that Accommodate Schedule housing mix provided as part of this pre-application submission results in a notable under provision of AH 3-beds and overprovision of AH 2-beds and market housing 3-beds. I strongly recommend reviewing this and amending the housing mix accordingly. It is recognised that this will need to be balanced with the density comments below and it is likely to be seen as 1- and 2-beds in flats and 3-beds in houses.'*

- 6.4.5. The AH mix has been discussed at length with an AH provider and has therefore been derived from these discussions. As such, the proposed mix is considered to be entirely acceptable.
- 6.4.6. In terms of the market home (MH) mix, the mix has changed significantly since the pre-application proposals and is considered to be acceptable, comprising a balanced mix and delivering a mix of 1, 2, 3 and 4 bed homes.
- 6.4.7. To conclude, the proposed housing mix and affordable housing provision is considered to be entirely acceptable.

## 6.5. Design, Form and Appearance

- 6.5.1. Policies 25, 32 and 33 of the Local Plan promotes development that protects, conserves and enhances the landscape character from inappropriate development.



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- 6.5.2. The policies state that proposals should take into account landscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.
- 6.5.3. As set out in the accompanying Design & Access Statement, the architectural approach that has been adopted consists of a high-quality design that complements the existing dwellings and would generally enhance the surrounding area. It is considered that the proposed development makes efficient use of the site while not having an adverse impact on its surroundings.
- 6.5.4. The proposed heights of the dwellings and flat blocks would be comparable to the surrounding area and wider allocation which has now been built out. As previously set out in Section 4 of this Statement, the proposed dwellings would be two storeys in height whilst the flat blocks would be three storeys. The existing flat blocks on Sargent Way range between three and four storeys in height. As such, the proposed scale of the dwellings and flat blocks is considered to be entirely acceptable.
- 6.5.5. In terms of the layout, there is a desire to improve the connectivity of the site to the open space and community facilities to the north, as discussed at pre-application stage. As such, the proposed site plan and landscaping plans show the possibility of including connectivity to the north via a pedestrian footpath. See snippet below.

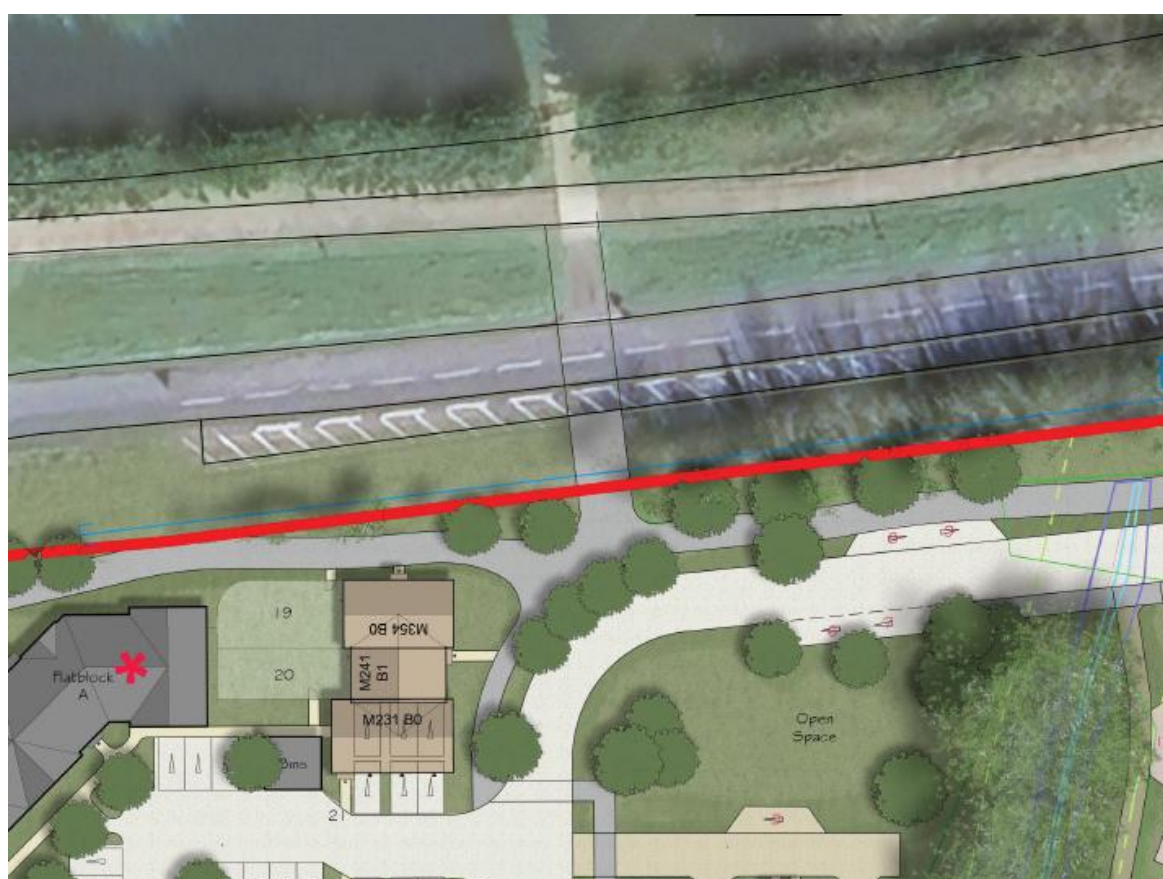


Figure 19 - Proposed Northern Connectivity

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- 6.5.6. It should be noted that the pedestrian link is considered to be indicated in the best location in relation to existing site levels and existing hedgerow located on the northern boundary. Furthermore, the link is located in close proximity to the proposed open space which is focused towards the centre of the development and therefore accessible to all users.
- 6.5.7. It is noted that the pre-application response suggested that two pedestrian crossings should be provided off Broadbridge Way. As such this has been explored but is unfortunately not possible due to site levels and existing vegetation. We trust therefore that the proposed singular crossing is sufficient in this instance.
- 6.5.8. In addition to the above, a pedestrian footpath is proposed to the east and west of the site, providing a number of connection points and therefore allowing connectivity from the site to the wider area. This is considered to be of an important community benefit.
- 6.5.9. Following feedback at pre-application stage, the pump station location near the site access has been reconsidered. As such and following detailed discussions between Markides and the LLFA, the pump station has been removed from the site plan in its entirety. We trust that this will be viewed favourably by the LPA.
- 6.5.10. In terms of materials, the proposals seek to accommodate similar materials to those prevalent in the immediacy. Please refer to the Design & Access Statement for further information.
- 6.5.11. It is noted that as part of the pre-app response, details of the boundary treatments were requested. In this respect, details of the boundary treatments have been included within the accompanying Landscaping information and Design & Access Statement. Further details can be controlled by condition if necessary.
- 6.5.12. Details of the proposed pedestrian access to rear gardens was also requested and this has been clearly marked on the proposed site plan.
- 6.5.13. In accordance with the NPPF, tree lined streets have been proposed where possible. This is explored further in the landscaping documentation.
- 6.5.14. To conclude, the proposed development results in a high quality scheme which would complement the wider development and immediate area. The use of materials closely replicates the surrounding area and the soft landscaping visually enhances the site. The proposed pedestrian crossing to the north, to connect the existing and proposed open space is considered to be a significant community benefit. As such, the proposals accord with local and national planning policy.

## 6.6. Residential Amenity

- 6.6.1. Policy 33 of the HDPF states that '*development should consider the scale, massing and orientation between buildings, respecting the amenities and sensitivities of neighbouring properties*'. It is also noted that as part of the pre-application response, the LPA stated that consideration to adjacent residential properties needs to be given in terms of potential impact from scale and massing, overlooking, and loss of light and privacy.
- 6.6.2. As illustrated in the proposed site plan, the proposed dwellings have been carefully placed within the site to retain neighbouring properties amenity on neighbouring roads. The proposed positions and angles of the buildings have been designed to prevent undue overlooking and inter-looking between surrounding dwellings and respecting separation distances.



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- 6.6.3. As such, separation distances of over 20m has been achieved between the proposed dwellings to the south of the site and those existing dwellings on Carter Drive. This is considered to be an acceptable distance when considering front-to-front elevation distances.



Figure 20 - Separation Distances Between Dwellings on Carter Drive and Proposed

- 6.6.4. For dwellings on Kilhams Close, distances of circa 12m have been achieved which is considered acceptable when considering rear-to-flank elevation distances.



Figure 21 - Separation Distances Between Dwellings on Kilhams Close and Proposed

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- 6.6.5. As illustrated on the proposed site plan, all of the dwellings will have access to private residential gardens. In addition to this, an area of open space is proposed in the centre of the site, along with the pedestrian connectivity access point to the north of the site which will provide easy access to the open space and facilities to the north. These are considered to be substantial benefits to the proposed residents.
- 6.6.6. Overall, the proposed development has been carefully designed to not result in an overbearing or harmful development and will respect the amenities and privacy to occupiers of the existing neighbouring property. In conclusion, the scheme is considered to meet the policy requirements set out in Policy 33 of the Local Plan.

## 6.7. Access, Transport and Parking

- 6.7.1. The proposed development is considered to be located in a sustainable area, owing its transport connectivity to Broadbridge Heath, Horsham and Warnham and the wider area; as well as its close proximity to key local services, as set out previously within this Statement. The location of surrounding public transport options and the close proximity of local services sets the proposal in accordance Policy 40 of the HDPF and Section 9 of the NPPF. The sustainable location of the site was recognised by HDC in the pre application response (reference PE/24/0234).
- 6.7.2. As set out previously, the proposals would seek consent for a new vehicular access to the western boundary (Broadbridge Way). Working alongside our Highways consultants, Markides, the vehicular access would be policy compliant and achieve acceptable visibility splays. Please refer to the accompanying documents/drawings for further information.
- 6.7.3. It is noted that during the pre-application engagement, HDC queried whether it would be possible to divert the main traffic off Broadbridge Way, then remaining for the bus route only but recognised that there may be complications with this. Since then, the Applicant Team have engaged with WSCC Highways and understand that there is a dedicated Team at WSCC Highways who are looking in to this, separately from the proposed development site. Due to concerns with the northern boundary including site levels, vegetation, bunds etc, a vehicular access from Broadbridge Way is not possible.
- 6.7.4. In addition to the above, the proposals seek to provide a large pedestrian/cycle connection to allow connectivity to the park and facilities to the north of the site. This was requested within the pre application response (reference PE/24/0234) and recognised as a significant community benefit. This feature has further been discussed with the Parish Council as part of our community engagement exercise and fully supported.
- 6.7.5. As previously set out, it is noted that the pre-application response suggested that two pedestrian crossings should be provided off Broadbridge Way. As such this has been explored but is unfortunately not possible due to site levels and existing vegetation. We trust therefore that the proposed singular crossing is sufficient in this instance.
- 6.7.6. In addition to the above, a pedestrian footpath is proposed to the east and west of the site, providing a number of connection points and therefore allowing connectivity from the site to the wider area. This is considered to be of an important community benefit.



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- 6.7.7. Policy 41 of the adopted Local Plan states that *'adequate parking and facilities must be provided within developments to meet the needs of anticipated users. Consideration should be given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired'*. Additionally, the 'West Sussex County Council Guidance on Parking at New Developments' (2020) has been reviewed in preparation of the application and identifies that the site is located in 'Zone 2' which generates a car parking need for the following:

Number of Bedrooms	Number of Habitable Rooms	PBZ2
1	1 to 3	1.4
2	4	1.7
3	5 to 6	2.1
4+	7 or more	2.7

**Figure 22 - Residential Parking Demand (spaces per dwelling)- West Sussex Guidance on Parking at New Developments**

- 6.7.8. The proposals comply with the above parking quantum and visitor spaces have been provided within the site. The visitor spaces have been placed equally within the site and are easily accessible.
- 6.7.9. Cycle spaces would be provided within garden stores located in the rear gardens of the dwellings. For the flat units, communal cycle sheds have been provided within the parking courts. Please refer to the accompanying Transport Statement for further information.
- 6.7.10. To conclude, the proposed development is not considered to have a detrimental impact on the highway network and in this respect, the NPPF Paragraph 116 is clear and states 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, following mitigation, would be severe, taking into account all reasonable future scenarios'*.
- 6.7.11. To conclude, the proposals are considered to be acceptable in access and parking terms. Please refer to the accompanying Report for further information.

## 6.8. Ecology and Biodiversity Net Gain

- 6.8.1. This application is supported by an Ecological Assessment and a Biodiversity Net Gain Statement which has been prepared by Derek Finnie Associates.
- 6.8.2. The accompanying Ecological Assessment sets out that an initial ecological assessment of the site, incorporating an Extended Phase 1 habitat survey in conjunction with a desk top data search, was undertaken in August 2023, with additional species specific survey undertaken throughout the summer of 2024; a verification site visit was conducted in March 2025. The report outlines the methodology employed, describes the current ecological resource within the site, evaluates the receptors identified and describes any ecological constraints and opportunities within the site. Please refer to the Assessment for further information.
- 6.8.3. In terms of BNG, the NPPF seeks to conserve and enhance the natural environment, and it is noted that biodiversity net gain has become a legal requirement from January 2024 for major redevelopment sites. In this respect, the accompanying Report sets out that the proposed development is not predicted to result in a net biodiversity gain, hence offsite solutions will be sought. It is proposed that a Habitat Management and Monitoring Plan (HMMP) be prepared the scheme to ensure the long-term management of the habitats is undertaken, with appropriate monitoring and remedial works as necessary.

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## 6.9. Trees

- 6.9.1. Policy 31 of the adopted Local Plan states *‘development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained’.*
- 6.9.2. It is noted that Paragraph 136 of the NPPF states that *‘Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined<sup>52</sup>, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.*
- 6.9.3. This application is supported by an Arboricultural Impact Assessment and Method Statement, in addition to Tree Protection Plans which have been prepared by ACD Environmental.
- 6.9.4. In conclusion, the proposed layout seeks to retain and protect all of the existing ‘A’ and ‘B’ category trees which are considered to be of the most value. All of the trees proposed for removal are in the lower two categories, ‘C’ and ‘U’; these trees are not considered to be of a quality that should represent any constraint to development. Please refer to the accompanying documents for further information.
- 6.9.5. The proposed site plan seeks to provide for new trees throughout the site, including via tree lined streets. The proposed development is therefore in accordance with local and national planning policy.

## 6.10. Landscaping

- 6.10.1. This application is supported by a Design & Access Statement, Illustrative Landscape Masterplan, hard and soft landscaping plans and a planting schedule which have been prepared in support of the application by FINC.
- 6.10.2. As set out within the accompanying plans, the site has been appropriately designed to include a mix of soft and hard landscaping which results in an attractive development site. The proposed landscaping is considered to visually enhance the site and surrounding area. The illustrative landscaping masterplan can be seen below.



Figure 23 - Illustrative Landscaping Masterplan

6.10.3. Please refer to the accompanying documents and plans for further information.

## 6.11. Sustainability

6.11.1. Policy 37 of the HDPF states that *'proposals must seek to improve the sustainability of development. To deliver sustainable design, development should incorporate the following measures where appropriate according to the type of development and location'. In addition to the measures listed under the policy, 'all new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of design'.*

6.11.2. This application is supported by an Energy Statement which has been prepared by AES Sustainability Consultants Ltd.

6.11.3. As set out within the accompanying Statement, the approach would be a fabric first approach to sustainable construction, demonstrating that improvements in insulation specification, a reduction in thermal bridging, unwanted air leakage paths and further passive design measures will ensure that energy demand and consequent CO2 emissions are minimised. The following conclusions are also provided:

*'A range of potentially appropriate low carbon and renewable energy technologies have been assessed for feasibility in delivering a further reduction in CO2 emissions, concluding that PV is considered the most appropriate technology for this site.'*

*The exact requirements for the Future Homes Standard are not yet confirmed, however it is likely that all plots falling under this regulation will be fitted with ASHPs, further reducing the carbon emissions. At this stage, the exact requirements of the Future Homes Standard are not known and so the exact quantity of plots under FHS will be determined once the regulations are finalised.*

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*Calculations demonstrate that PV would deliver circa 15.20% of the development's energy demand a projected 4.82% carbon reduction over Part L 2021, far exceeding any policy requirements.*

*The development will additionally consider the longer-term impacts of a changing climate, building in resilience through the construction specification and managing overheating risk through consideration of thermal mass and solar gain.*

*Water calculations show this development will reduce water usage to 85 litres/person/day.*

*Appropriate provision for internal waste and recycling storage will be provided to ensure that recycling can be split into the appropriate streams for collection'.*

- 6.11.4. In addition to the above, electrical vehicle charging points would also be accommodated on the site, in accordance with Building Regulations.
- 6.11.5. To conclude, the proposals are considered to be acceptable in terms of energy and sustainability. Please refer to the accompanying Report in full.

## 6.12. Drainage

- 6.12.1. This application is supported by a Flood Risk and Drainage Report which has been prepared by Markides. The application is additionally accompanied by Groundwater Monitoring Data which has been prepared by IDOM.
- 6.12.2. To conclude, the site has been identified as within Flood Zone 1 which indicates a low risk of flooding from rivers and the sea. The pre-development flood risk to the proposed development from all sources has been assessed and it has been determined that the risk of flooding to the site is low to very for all sources with the exception of surface water, which has a risk of low to high. Following mitigation, the post-development flood risk to the proposed development from all sources has been assessed as low to very low.
- 6.12.3. The proposals seek to discharge surface water run-off from the site into an ordinary watercourse that runs through the centre of the site from north to south. Attenuation will be sited in below ground attenuation tanks, infiltration trenches and permeable paving subbases.
- 6.12.4. In conclusion, the report demonstrates that the proposals are in line with the relevant National, Regional and Local Policies and guidance, ensuring that the surface water drainage system will effectively manage flows. The risk of flooding to the site is considered acceptable and surface water run-off can be adequately managed without increasing the risk of flooding on-site or elsewhere.
- 6.12.5. In terms of foul, foul water drainage is proposed to connect to the future adopted sewers in Sargent Way and Carter Drive.
- 6.12.6. Please refer to the accompanying Reports for further information.

## 6.13. Air Quality

- 6.13.1. This application is supported by an Air Quality Assessment which has been prepared by Omnia. The following executive summary is provided:

*'An Air Quality Assessment was undertaken to support a planning application for a residential development at Wickhurst Green, Broadbridge Heath.*



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*The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. As such, an Air Quality Assessment was undertaken to determine baseline conditions and assess potential impacts as a result of the scheme.*

*Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of earthworks, construction and trackout activities. It is considered that the use of good practice control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.*

*During the operational phase of the development there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the relevant screening criteria. Due to the low number of vehicles trips anticipated to be produced by the scheme, road traffic exhaust impacts were predicted to be not significant.*

*Potential emissions from the proposals were assessed in accordance with the requirements of the Air Quality and Emissions Mitigation Guidance for Sussex. This included completion of a damage costs assessment in order to determine the appropriate level of mitigation required for the scheme.*

*Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.'*

## 6.14. Noise Impact

- 6.14.1. This application is supported by a Noise Assessment which has been prepared by Acoustic South East. The following conclusion is provided within the Assessment:

*'Three class 1 sound level meters were used to characterise the site soundscape between 10-15th April 2025. These were located at Sargent Way to the West of the application site, Broadbridge Way to the North of the site and Old Wickhurst Lane to the East of the site. The location of the survey was designed to consider the relevant road traffic sound sources, as well as the Tesco car wash, as all of these had been previously flagged for attention by Horsham District Council in their pre-application advice with the client.*

*Distant road traffic noise is heard from the A24 to the East of the site. The survey data identified that Broadbridge Way is the noisiest sound source to the North of the site. Subjectively, Tesco drive through car wash could also be detected at the far Eastern boundary of the site.*

*Contextually, housing already exists to the West, South and North of the application site.*

*The worst-case Sound Reduction Index (SRI) is for Plot 19 and is driven by L<sub>Amax</sub> events for the overnight period. Plot 19 is located approximately 13m immediately South of Broadbridge Way.*

*Rigorous calculations of the worst-case plots identified that only Plot 19 required enhanced glazing for the bedroom spaces. The remainder of the site is capable of being constructed using standard thermal double glazing (R<sub>traffic</sub> 25dB(A))*



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*All garden spaces/external amenity areas have been assessed and are all below 55dB LAeq, 16 hour achieving the requirements of BS8233:2014 and the World Health Organisation Guidelines for Community Noise dated 1999, revised 2018.*

*A ProPG2017 initial site risk assessment to inform stakeholders and decision makers alike indicates that the site is a low to medium risk in respect of mitigation measures required to protect future occupants.*

*Planning permission should not be withheld on noise grounds.'*

## 6.15. Archaeology

- 6.15.1. This application is supported by an Archaeological Desk Based Assessment and Heritage Statement which has been prepared by RPS in support of this application.
- 6.15.2. In summary, the Report concludes that the proposals will not affect the setting of any designated heritage assets including Scheduled Monuments, Conservation Areas or Listed Buildings.
- 6.15.3. The site is not located within an Archaeological Notification Area (ANA) but is located close to one. Larger scale archaeological investigations took place for the adjacent Wickhurst Green residential development and its associated infrastructure in 2011 and 2012, and this has been considered in full in the accompanying Report. The Report concludes with the following:

*'Given the site's low archaeological potential for occupation but higher potential for landscape and a communication route, if required any intrusive trenching works could be implemented under a suitably worded planning condition following granting of the planning consent. In the event of positive results further mitigation may be required.'*

## 6.16. Land Contamination

- 6.16.1. This application is supported by a Geoenvironmental Assessment which has been prepared by IDOM in support of the proposals.
- 6.16.2. The Report should be read in full in determination of this application. In summary, the Report concludes that:

*'11.1 Localised made ground was encountered comprising gravelly sandy clay with inclusions of flint, brick, concrete and clinker south of the site. The made ground is likely from the previous use of the site as a compound. The underlying bedrock geology comprised the Weald Clay Formation, consistent with the published geology, with exception from superficial deposits of Alluvium encountered southwest of site.*

*11.2 Significant contamination has not been encountered in the soil or groundwater. The risk to all identified receptors is either very low or low.*

*11.3 Made ground containing brick and concrete will not be suitable for re-use as a growing medium in soft landscaped areas.*

*11.4 Preliminary classification indicated that soils would be classified as non-hazardous for off-site disposal but may fail acceptance criteria for inert tip.*

*11.5 Natural as-dug arisings (excluding topsoil) could be classed as inert waste without the requirement for WAC testing.*

*11.6 Based on the results from the six rounds of monitoring, the gas regime beneath the site is classified as Characteristic Situation 1 and therefore, gas protection measures will not be required in the new buildings.*

*11.7 Long term continuous groundwater level monitoring is being undertaken and will be reported under separate cover in March 2025.*

*11.8 The ground investigation found a relatively limited thickness of made ground and topsoil on the majority of the site underlain by the Weald Clay Formation. Allowable Bearing Pressures for reinforced strip footings taken into the Weald Clay Formation have been provided. Footings maybe shallowed up from 1m bgl provided that they are taken through the topsoil/made ground/Alluvium and are below or at the depth recommended by Chapter 4.2 of NHBC Standards 2024.'*

6.16.3. Further information can be controlled by appropriately worded conditions, if necessary.

## **6.17. Water Neutrality**

6.17.1. The application site falls within the Sussex North Water Supply Zone as defined by Natural England and which includes supplies from groundwater abstraction which cannot, with certainty, demonstrate no adverse impacts upon the defined Arun Valley SAC, SPA and Ramsar sites.

6.17.2. An advice note from Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

6.17.3. On this basis, a Water Neutrality Statement has been prepared by Motion to demonstrate that the proposal can achieve water neutrality. The accompanying Statement concludes that the development will purchase credits in the Sussex North Offsetting Water Scheme (SNOWS), or through a suitable alternative bespoke offsetting scheme. Therefore, the residual mains water requirement of the development of 14,768.06 litres per day has been fully offset and there is no additional mains water requirement within the SNWSZ as a result of the development. This strategy will minimise the impact of the new development on the Sussex North Water Supply Zone. The Water Usage Strategy confirms proposal will be water neutral once complete and therefore satisfying Natural England's requirements.

## 7. Conclusions

- 7.1. To conclude, this Planning & Affordable Housing Statement has been produced by **ECE Planning** on behalf of our client, **Vistry Homes** in support of an application for Full Planning Permission for development at Land South of Broadbridge Heath, Old Wickhurst Lane. The description of the proposal reads:

*'Full Planning Application for the erection of 89no. residential dwellings comprising dwellings (54no.) and apartments (35no.), 36% affordable homes, creation of new vehicular access on to Sergeant Way, provision of public open space, landscaping and drainage solutions'.*

- 7.2. The Applicant has previously undertaken Pre-Application discussions and a meeting with Horsham District Council which culminated in a response dated 17 December 2024 (reference PE/24/0234). Refer to Appendix A for the Pre-Application response. The Applicant alongside SECNewgate, has also carried out consultation with the Parish Council; feedback from this consultation has also helped to inform the current layout.
- 7.3. Following feedback from the meetings and written response from the LPA, the Applicant Team submitted amendments to HDC via email dated 4 April 2024. At the time of writing this Statement, a detailed response from HDC has not been received. This submission therefore seeks to address HDC's initial comments dated 17 December 2024 in further detail.
- 7.4. As set out, the proposals are considered to be entirely acceptable in terms of the principle of development. The site is located in a highly sustainable location and development of 89no. units is considered to be a very valuable contribution towards the District's significant housing need in which the LPA are only able to demonstrate a 1-year supply of housing. HDC's significant undersupply of housing should not be underestimated and the provision of 89no. new homes in this location should be viewed favourably as there is a clear presumption in favour of housing on this land, in accordance with Paragraph 11(d) of the NPPF.
- 7.5. Whilst we recognise that the LPA have a significant undersupply of housing and have expressed a desire for the site to accommodate a higher quantity of housing on the land, the Applicant Team have explored in detail whether an increased quantum of residential units can be accommodated on the site, whilst also providing the necessary infrastructure and remaining policy compliant in terms of car parking, space standards etc. As such, the increase of units from the pre-application request should be welcomed and is considered to result in the right balance with increasing density whilst also providing the necessary services. We also understand that a further increased quantum on this site above 89no units would not be welcomed by the Parish Council. We look forward to discussing this in further detail with the LPA.
- 7.6. The proposals further seek to provide 36% affordable housing and therefore seeks to meet a variety of housing needs.
- 7.7. The proposed housing mix and tenure is considered to be entirely acceptable and has been informed by the pre-application response from HDC. The scale of the proposed buildings are also considered to be acceptable and in keeping with the immediacy.

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- 7.8. As recognised in the pre-application response, the site is situated within a sustainable location and benefits from close proximity to a number of sustainable transport methods, services and amenities, as concluded in the accompanying Transport Report. The proposals additionally accommodate sufficient car parking and cycle provision. It is considered that the proposed development will not result in any adverse impact on highway capacity and safety.
- 7.9. In terms of landscaping, it has been demonstrated that the proposals would not result in detrimental impact on the environment or landscape but will instead have significant benefits. The proposed layout will provide an overall soft and high quality landscape. Open space provision will be provided and a pedestrian crossing is indicated to the north of the site to allow for connectivity to the open space and facilities to the north. This is considered to be a significant benefit to the community.
- 7.10. Significant research has been carried out in terms of drainage/flooding and the application is supported by a suite of flood and drainage information which demonstrate that future residents would be safe from flooding.
- 7.11. All other material considerations such as air quality impacts, noise impacts, archaeology and contamination have been considered within this statement and accompanying reports which demonstrate that the proposed development would not result in any significant harm to amenity or environment which cannot otherwise be mitigated by appropriate conditions.
- 7.12. A solution to water neutrality has also been suggested and can be secured via appropriately worded conditions.
- 7.13. Overall, the application is located in a sustainable location and is accordant with adopted policy, supplementary planning documents and the NPPF, in particular the presumption in favour of sustainable development. It is strongly contended that all relevant issues have been satisfactorily addressed, such that there would not be any demonstrable harm as a result of the development proposed and planning permission should be granted without delay.

## Appendix A – Pre Application Response Dated 17 December 2024 – Reference PE/24/0234





Chris Barker  
ECE Planning  
64-68 Brighton Road  
Worthing  
BN11 2EN

Our ref: PE/24/0234  
Your ref:  
Officer: Stephanie Bryant  
Email: Stephanie.Bryant@horsham.gov.uk  
Tel:  
Date: 17th December 2024

Dear Sir/Madam,

**Location:** Land South of Broadbridge Way, Broadbridge Heath, West Sussex

**Details:** Development of up to 80 residential units

Your enquiry has been considered and I can advise as follows:

Pre-application advice is sought for the Development of up to 80 residential units at Land South of Broadbridge Way, Broadbridge Heath, West Sussex.

The main elements of the proposed scheme comprise of:

- Construction of new dwellings.
- New vehicle access.
- Landscaping.

The advice is given based on the following:

- Cover Letter
- Design & Access Statement
- Proposed Site layout
- Site Entrance Gateway Views

Site and Surrounds:

The pre-application site comprises of two open fields within the built-up area boundary of Broadbridge Heath, with some boundary vegetation along sections of the northern and eastern site boundary.

The site is located directly south of Broadbridge Way with a recreation ground, café and pre-school beyond to the north. Sargent Way is located to the west of the site with three-storey residential dwellings and a convenience store beyond. Two storey residential properties are also located to the south of the site, with the property vehicle access and parking fronting onto the pre-application site. Old Wickhurst Lane is located to the east of the site, along which Public Footpath 1632/2 runs, with a petrol station and football club beyond. NFU Mutual business is located directly to the north east of the pre-application site with the vehicle access and parking located closest to the site boundary.

A drain with a low surface water flood risk runs through the site from south to north and connects to the drain along the south of Broadbridge Way. The site has been undeveloped for some time and has started to naturally regenerate with grassland and shrubs.

Planning history:

DC/09/2101	Erection of 963 residential units, community facility including land for a primary school, neighbourhood centre, youth and recreational facilities, other formal and informal open space, landscaping and environmental works, transport and access arrangements, new east-west link road, improvements to Five-Oaks roundabout, realignment and partial closure of existing A264 Broadbridge Heath by-pass and other ancillary works (Outline).	Permitted 03.11.2011.
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Development Plan Policies:

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The **Horsham District Planning Framework [HDPF]**, adopted in November 2015 is relevant and remains the starting point for the assessment of this proposal, with specific reference to the following policies:

Policy 1 - Strategic Policy: Sustainable Development  
Policy 2 - Strategic Policy: Strategic Development  
Policy 3 - Strategic Policy: Development Hierarchy  
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 31 - Green Infrastructure and Biodiversity  
Policy 32 - Strategic Policy: The Quality of New Development  
Policy 33 - Development Principles  
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

**Horsham District Local Plan (2023-40) (awaiting examination)**

Strategic Policy 1: Sustainable Development  
Strategic Policy 2: Development Hierarchy  
Strategic Policy 6: Climate Change  
Strategic Policy 7: Appropriate Energy Use  
Strategic Policy 8: Sustainable Design and Construction  
Strategic Policy 9: Water Neutrality  
Strategic Policy 10: Flooding  
Strategic Policy 11: Environmental Protection  
Strategic Policy 12: Air Quality  
Strategic Policy 13: The Natural Environment and Landscape Character  
Strategic Policy 17: Green Infrastructure and Biodiversity  
Strategic Policy 19: Development Quality  
Strategic Policy 20: Development Principles  
Policy 23: Infrastructure Provision

Policy 24: Sustainable Transport  
Policy 25: Parking  
Strategic Policy 37: Housing Provision  
Strategic Policy 38: Meeting Local Housing Needs  
Policy 37: Affordable Housing  
Policy 40: Improving Housing Standards in the District

Other Relevant Guidance and Policies:

- National Planning Policy Framework [NPPF] (2021)
- Planning Practice Guidance [PPG]
- Air Quality and Emissions Mitigation Guidance for Sussex (2020)
- Planning Advice Note: Biodiversity and Green infrastructure (2022)
- Planning Advice Note: Facilitating Appropriate Development (2022)
- Land West of Horsham Design Principles and Character Areas SPD (2009)
- Land West of Horsham Masterplan DPD (2009)

## **Planning Advice**

### **Principle of Development**

The site is located within the Broadbridge built-up area boundary and is a sustainable location with good active travel connections. As such the principle of development in this location is supported in accordance with policy 2 and 3 of the HDPF and the West of Horsham Masterplan DPD subject to other policy criteria being met.

### **Housing Mix and Affordable Housing**

Affordable housing (AH) provision will need to reflect the policy requirements at the time of submission. Under the HDPF this would be a minimum 35% AH, with 70% of such housing to comprise Affordable Rent and the remaining 30% intermediate housing, and under the emerging Horsham District Local Plan (HDLP) this would be 45% AH for all new housing development on greenfield land. The weight to be applied to the HDLP's AH requirements will increase after examination. In the meantime, the Accommodation Schedule provided as part of this pre-application submission indicates a 42% AH provision, in excess of current policy requirements, which is welcomed.

The Council's Strategic Housing Market Assessment provides an indicative mix of housing sizes that development should provide, however please note that the latest evidence from our housing team is that there is a significantly greater demand for 3-bed affordable rent homes than 1 or 2 bed affordable rent homes. It is also recommended engaging early on with an affordable housing provider to help inform the AH requirements and design for this site. It is noted that Accommodate Schedule housing mix provided as part of this pre-application submission results in a notable under provision of AH 3-beds and overprovision of AH 2-beds and market housing 3-beds. I strongly recommend reviewing this and amending the housing mix accordingly. It is recognised that this will need to be balanced with the density comments below and it is likely to be seen as 1- and 2-beds in flats and 3-beds in houses.

In addition, the Council's Head of Housing and Communities has expressed an interest in exploring further the delivery of one and two bed flats for rent, as well as family homes on the site in question through the Council's housing company, Horsham District Homes. There needs to be evidence that the Registered Provider market has been fully tested first, and it is recommended that Saxon Weald and other providers who own and manage stock at Wickhurst Green are given an opportunity to acquire the units. Both the Head of Housing and Communities and the Affordable Housing Enabling Officer would welcome further discussion.

## Layout and Design

### *Density*

The main concern with regard to design and layout is around density and number of proposed dwellings.

The NPPF (2024) is clear that decisions should promote effective use of land in meeting the need for homes and recommends using design guides to ensure land is used efficiently to achieve appropriate densities. In particular, paragraph 130 states that: *Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site..... local planning authorities should refuse applications which they consider fail to make efficient use of land.*

As highlighted within the application submission, Horsham does not currently have a 5 year housing supply, therefore it is particularly important in this case to achieve an appropriate site density and efficiently and effectively use this land towards addressing housing needs.

Character Area 3 of the Land West of Horsham Design Principles and Character Areas SPD details acceptable levels of density of up to 60-65 dwellings per ha for this part of the wider Wickhurst Green development, with the neighbouring residential areas to the west and south having a density per ha (dph) of between 40 and 50dph. The adjacent land to the west is currently built at circa 69 dph. However, the proposed layout has a density of around 30dph, of which the majority comes from the western half of the site with the eastern half being around 26dph. This is significantly lower than anticipated in the SPD and experienced elsewhere in the area.

The site is in a highly sustainable location within the BUAB and an area without a 5-year housing supply. Therefore, in view of this, the NPPF and Character Area 3 guidance and existing surrounding densities, a greater housing density is expected for this site to maximise housing delivery for this site.

As indicated within the Character Area 3 details, this should be provided through a mix of two and three storey buildings, terraced units and apartment blocks and close knit development and continuous building forms (Nb We would consider taller buildings if demonstrated to be appropriate). The current layout does not reflect this and would be more in keeping with an edge of settlement development than a central, urban, sustainable location within a BUAB.

Accordingly, the proposed site layout and density is considered unacceptable at present and needs modification to appreciably increase the density and number of dwellings being provide ahead of any submission.

### *Community benefits*

As indicated within the Affordable Housing comments and Highways, Traffic and Access section below, a key part of this scheme will be the provision of community benefits. This is because the site was originally intended to be a community facility and it is important that community benefits are still provided alongside any residential scheme. This will also help with garnering local support for the scheme. Whilst an increase in affordable homes towards 100% of the site would be welcome, particular attention should be paid towards improving linkages to the open space and facilities to the north and the facilities therein. An important part of the Masterplan DPD and Design SPD for this area was the focus on drawing the old and new community together via improvements to this area of open space surrounded by the neighbourhood centre, parish hall, village hall and play areas. This vision has yet to be realised therefore it would be beneficial to your application to work with the community on assisting in the delivery of improvements to this area, either via direct delivery, or contributions.

I can see from previous discussions on this site that various linkages to the north and open space provision/urban courtyards were explored but this seems to be largely absent from the currently proposed site layout. I strongly recommend reviewing this again and amending the layout as I have suggested within the relevant sections.

#### *Other comments*

Within the Highway, Traffic and Access section below, I detail recommendations in regard to pedestrian connectivity to the north of the site and a northern vehicle access. This has implications for the site layout which I strongly recommend including within any submission.

The location of the pump station at the site access and on the active frontage for Sargent Way is not supported. Any submission should include a revised pump station location that reflects better design and reduced visual impact.

The colour palette and finishing materials should reflect the existing, neighbouring development so please ensure this detail is included within any submission.

Any submission should also include clearer pedestrian access to rear gardens and boundary treatments, where for example brick walls are required where private spaces are located adjacent to the public realm.

### **Landscape and Neighbouring Amenity**

As identified within the pre-application submission, the adjacent residential properties need to be considered along with the potential impact from scale and massing, overlooking, and loss of light and privacy. However, given the principle and design support for an equally dense layout, I do not have any particular concerns in this regard.

### **Highways, Traffic and Access**

Page 12 of the DAS includes a suggested pedestrian crossing off Broadbridge Way which provides a much better crossing than that currently shown on the Proposed Site Layout. In view of the above on rat running and community benefit, I recommend proposing the better pedestrian connection on page 12 of the DAS. I also recommend exploring the provision of a similar crossing across from the pre-school where there is an existing pedestrian access on the northern side of Broadbridge Way. I understand from the pre-application meeting that there are complications with regard to level changes, however the delivery of both of these will help with slowing down traffic along Broadbridge Way and improve pedestrian connectivity to the community facilities on the northern side of Broadbridge Way. As the site was originally intended for a community use, it will be important to demonstrate to the Parish and local community how community benefits are being provided as part of these scheme to encourage support. I recommend liaising with the Parish Council to better understand their vision for this area to identify other ways to help them to realise their intentions.

It was also suggested within the pre-application meeting whether it would be possible to divert the main traffic off Broadbridge Way through the site. Ideally this would be a connection at the north of the site and with Broadbridge Way then remaining for the bus route only, but it is recognised there may also be complications with this. As you are aware, there are continued issues with rat running along Broadbridge Way and any measures that can be provided as part of this scheme to mitigate and minimise this would be highly encouraged. WSCC Highways have prepared a taskforce which are reviewing improvements to address the traffic and highway issues also Broadbridge Way, and I strongly recommend getting in touch with them to see what ideas they have and how this scheme can support the delivery of these.



I have no concerns with regard to the proposed access off Sargent Way, although as discussed above I recommend exploring the provision of another access off Broadbridge Way to divert the main traffic through this site and detailing this within any submission.

The quantum of parking appears acceptable and well located in proximity to dwellings, although as part of providing an increase density on the eastern part of the site, I suggest exploring more grouped parking and parking courts as per the Character Area 3 details. Please ensure these still include some tree planting/vegetation to visually break up the mass of hardstanding and parking. Any submission would also need to include details of cycle parking, EV charging points and bin storage.

In view of the above recommendations and comments, I recommend engaging with WSCC Highways on the proposed access, parking quantum and alterations to Broadbridge Way in terms of pedestrian connectivity and improved highway safety.

## **Ecology, Biodiversity and Trees**

### *Ecology*

Parts of the site are located within the Amber Impact Risk Zone for Great Crested Newts, which is considered to be the suitable habitat with a likelihood of Great Crested Newts being present. The application site is also located within the supporting area for bats. Therefore, should an application be submitted, it would need to be supported by a Preliminary Ecological Assessment, with Great Crested Newts surveys and Bat and Bird Scoping Reports.

### *Trees*

It is noted that there are existing trees within the site and in accordance with policies 31 and 33, I encourage retaining and protecting these where possible. For any submission, a tree survey would be required for all existing trees on the site and their condition. This should inform an Arboricultural Statement, which will also be required at submission. The Arboricultural Statement should include details of any trees to be removed with justification for their removal, tree protection measures for retained trees, and proposed planting. This should be accompanied by plans showing the existing trees and their root protection areas (RPAs), tree protection measures and new tree planting.

### *Biodiversity*

Biodiversity Net Gain is mandatory as of 12 February 2024, meaning should an application be submitted for this development, at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat will need to be demonstrated as deliverable and subsequently delivered.

The HDLP includes a policy which requires 12% net gain. This would include the submission of a completed biodiversity metric and statement. Further information can be found on the government's biodiversity net gain webpage:

<https://www.gov.uk/guidance/biodiversity-net-gain#biodiversity-net-gain-submitting-a-planning-application>

Any submission will need to include a completed biodiversity metric and statement, which demonstrates the required net gain percentage at the time of submission.

## **Water Neutrality**

The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

Accordingly, a Water Neutrality Statement (WNS) would be required as part of any submission. I recommend reviewing the Horsham Water neutrality and planning applications FAQs page to get clarity on the detail expected within a WNS:

<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/water-neutrality-and-planning-applications>

In regard to accessing SNOWs scheme for offsetting, the Council is currently awaiting further information before confirming the use of this scheme going forward therefore I am unable to advise at this time. It will only be accessible to schemes which accord with development plan policy and/or allocated sites, and there will be a prioritisation system which will include strategic sites currently waiting for offsetting. It is likely that this scheme would meet these requirements therefore subject to the further information and confirmation of the use of the scheme, this proposal would be able to benefit from SNOWs. It is unclear at the time of writing what the time and cost implications would be, therefore I recommend reviewing any guidance published by HDC on SNOWs in the next month or so.

### **Flood Risk and Sequential Test**

The National Planning Practice Guidance (NPPG) is clear where the sequential test is required for major development in areas at risk of flooding, unless the site is allocated, in an area at low risk from all sources of flooding or is exempt as per the NPPF. A sequential test may also not be needed if development can be laid out so that only elements such as public open space, biodiversity and amenity areas are located in areas at risk of any source of current or future flooding.

According to EA mapping, the most northern section of the pre-application site garden area is located within an area of low risk of surface water flooding. It is therefore important that any proposed built development remains located outside of this area of low surface water flood risk to avoid the need for a sequential test, per paragraph 175 of the updated NPPF. It is unclear from the pre-application submission details if the proposed development would be located within the area of surface water flood risk, therefore I recommend reviewing this before any submission and including confirmation of this detail within any submission.

Any application must also include a Drainage Strategy, which incorporates SuDS as per HDPF policy 38 requirements, and takes account of existing underground services and tree RPAs.

### **Application Submission**

In the event that all of the above matters can be satisfactorily addressed and mitigated for, then the following provides a 'without prejudice' summary of the supporting documents that would be expected to be submitted. In addition to the application form, fee and usual suite of location plans and architectural drawings, the supporting documents that should be submitted include:

- Planning Statement, including Affordable Housing schedule.
- Design and Access Statement.
- Elevational drawings, including proposed heights and finishing materials.
- Boundary Treatment and Open Space drawings.
- Transport Statement and details on proposed vehicle and cycle parking.
- Preliminary Ecological Appraisal and surveys, including on Newts, bats, birds and badgers.
- Arboricultural Impact Assessment including existing tree survey and plans of existing trees, tree protection measures and proposed tree planting, including 15m Ancient Woodland buffer zone planting.
- Biodiversity Net Gain DEFRA Metric and statement.

- Water Neutrality Statement.
- Drainage Strategy (any SuDS proposals must reflect and be coordinated with the proposed landscape strategy)
- Air Quality Assessment and Emissions Mitigation Assessment. For the AQA, please note that there is an Interim Planning Guidance on the consideration of the Environment Act PM2.5 targets in planning decisions.
- Noise Impact Assessment (covering Tesco filling station and car wash to east, and Broadbridge Way and Sargent Way to north and west).
- Preliminary Geo-Environmental Risk Assessment.

In terms of engagement, I strongly recommend engaging with Broadbridge Parish Council to better understand their vision for this area and how the proposed development can facilitate this, and to arrange to attend their Committee Meetings to present your plans, before considering a formal submission to HDC. You may also wish to contact the Local Councillors for these wards, as well as residents who live nearest the site to brief them about the proposals, and to ascertain their views. Separate discussions with West Sussex County Council on highways matters and flood risk may also be beneficial. A Statement of Community Involvement should be submitted with any future planning application to summarise what was undertaken.

The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/24/0234 in your submission.

Yours faithfully

Stephanie Bryant  
Senior Planning Officer

### **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

Horsham District Council implemented a Community Infrastructure Levy (CIL) Charging Schedule on 1st October 2017.

The Community Infrastructure Levy is a charge placed on new development. The funds raised will help to pay for a wide range of infrastructure to support development across Horsham District.

Most new development which creates net additional floorspace of 100m<sup>2</sup> or more, or creates a new dwelling, (including permitted development), is potentially liable for the levy.

#### **How does it affect you?**

Applications for CIL liable development which are determined on or after 1st October 2017 are required to pay the Community Infrastructure Levy (unless the development qualifies for relief or exemption).

Further information and the rates charged by Horsham District Council are set out in the CIL Charging Schedule which can be viewed online at [www.horsham.gov.uk/planning/apply/cil](http://www.horsham.gov.uk/planning/apply/cil)

#### **General Consent e.g. Permitted Development**

Developments which are permitted by way of a general consent (such as permitted development) may still be liable to pay the Community Infrastructure Levy if they meet the above criteria.

In these circumstances, you must submit a Notice of Chargeable Development (CIL form 5), notify us of the person who will assume liability to pay the CIL and make any applications for relief or exemption, before the development is commenced.