



# Planning Statement

## Incorporating Statement of Community Involvement

### Land at Thakeham Tiles, Rock Road, Storrington

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## Basis of Report

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## 1.0 Introduction

- 1.1 SLR Consulting has been instructed by the applicant, Thakeham Concrete Products Ltd (hereafter referred to as 'Thakeham Tiles' or 'the Client'), to prepare a Planning Statement in support of the submission of an outline planning application to Horsham District Council for the construction of a development up to 108no. new homes, including affordable housing units, associated access, vehicle parking, and landscaping on the Land at Thakeham Tiles, Rock Road, Storrington ('the Site').
- 1.2 The proposal for 108no. homes is being submitted for approval in Outline form, and is shown in the extract from the submitted Illustrative Masterplan, below:

**Figure 1: Extract from Illustrative Masterplan**



- 1.3 To assist the Council with its understanding of the site and with the decision-making process; this Planning Statement presents an analysis of the application site and surrounding area and sets out the relevant planning history and planning policy context. The Statement explains why



the proposed development is appropriate, having regard to the key planning policies, as well as technical and environmental considerations.

- 1.4 The Planning Statement (which includes a Statement of Community Involvement, EIA Screening, Mineral Resource Assessment, Energy Statement and s106 Heads of Terms) is supported by, and should be read in conjunction with, a suite of supporting plans, reports and technical documents, as set out below:

## Reports

- Application Form / Certificates
- CIL Form
- Planning Statement - *including a Statement of Community Involvement, EIA Screening, Mineral Resource Assessment, Energy Statement and s106 Heads of Terms* (by SLR Consulting)
- Covering Letter (by SLR Consulting)
- Affordable Housing Viability Assessment (by Rose Hill Advisors) - **CONFIDENTIAL**
- Design and Access Statement (by Thrive)
- Air Quality Assessment (by Stantec)
- Arboricultural Impact/Method Statement - *including Tree Survey* (by CBA Trees)
- Biodiversity Net Gain Report and HMMP (by EcoSupport)
- Biodiversity Net Gain Metric (by EcoSupport)
- Ecological Impact Appraisal and Surveys (by The Ecology Co-Op)
- Flood Risk Assessment (By Stantec)
- Drainage Strategy (by Stantec)
- Ground Investigation Assessment (by Stantec)
- MEP Report (by Stantec)
- Heritage Statement (by Thakeham Tiles Ltd)
- Landscape Visual Assessment (by Lizard)
- Landscape Design Strategy Report (by Lizard)
- Noise Assessment (by Ian Sharland)



- Transport Assessment – *including access plans* (by Calibro)
- Travel Plan (by Calibro)
- Utilities Assessment (by Utility Results)
- Water Neutrality Statement (by H20Geo)

## Plans

- Location Plan [THAK230417\_SLP-01]
- Constraints and Opportunities Plan [THAK230417\_CP-01 A]
- Illustrative Masterplan [THAK230417\_IMP-04 A]
- Land Use Parameter Plan [THAK230417\_LUPP-01]
- Access and Movement Parameter Plan [THAK230417\_AMPP-01]
- Density Parameter Plan [THAK230417\_DPP-01]
- Storey Heights Parameter Plan [THAK230417\_SHPP-01]
- Indicative Site Sections [THAK230417\_ISS-01]
- Topographical Plans [32301 – Sheet 1 and 2]
- Illustrative Landscape Masterplan [LLD3475-LAN-DWG-010 Rev 02]
- Drainage Strategy Plan [37212-STN-XX-XX-DR-C-2200 Rev P01]
- Tree Retention and Removal Plan [CBA.10637.02 TRR and TPP]



## 2.0 The Site and Surroundings

### Site Location

- 2.1 The Site is 6.12ha in size and is located to the south of Rock Road, to the east of Storrington, primarily within the settlement boundary of Storrington and Sullington<sup>1</sup>. The Site is within the Thakeham Parish but sits close to the border of the Washington Parish to the east and the Storrington and Sullington Parish to the west.
- 2.2 The Site is allocated for housing development within the made Thakeham Neighbourhood Plan (2017, Policy Thakeham2).
- 2.3 The Site's vehicular and pedestrian access is currently from Rock Road. There is also a Public Right of Way through the Site (east to west), connecting Hillside Walk and Bracken Lane – this is footpath number 2625.
- 2.4 There is existing residential development to the immediate south, east and west of the Site. To the north, the site is bounded by Rock Road, running east to west from Storrington towards the A24. To the direct north of the Site is an open field which backs onto Crescent Rise. This site is a draft allocation in the emerging Horsham Local Plan for 55 houses (draft Policy HA18, site ref STO2).
- 2.5 Steyning Grammar School and Thakeham Primary School are located approximately 300m to the west of the Site. Rydon Community College Playing Field (allocated as a Local Green Space in the Thakeham Neighbourhood Plan) is located to the west of the Site.
- 2.6 The village of Storrington (a second-tier settlement) is located c.1.5km to the west of the Site, Storrington has good range of services and facilities including a range of shops, pubs, churches, leisure centre, post office, and a GP surgery.
- 2.7 The village of Ashington is located c.3km to the east, and to the north-west of the site are the villages of West Chiltington and Pulborough which are c.2km and c.5km from the site respectively. The site is located approximately 9km from Billingshurst, 11km from Southwater, and 16km from Horsham which are all larger settlement to the north of the site. Worthing is located c.10km to the south of the site.
- 2.8 There are bus stops on Water Lane, Thakeham Road, Storrington Road which are served by bus service nos. 1, 71, 74A and 74B, connecting the site to Horsham, Midhurst, Petworth, Worthing and Chichester. The closest train stations to the Site are Amberley and Pulborough

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<sup>1</sup> It is acknowledged that the two parcels of land either side of the existing site access are located outside of (but adjoining) the defined Built-Up Area Boundary (BUAB) of Storrington.



which provide connections to Gatwick, London, Crawley, and destinations along the south coast including Portsmouth and Bognor Regis. Gatwick Airport is c.31km to the north-east of the Site.

- 2.9 The Site is located wholly within Flood Zone 1 as shown on the EA map for flooding. The most recent EA mapping shows minor areas of surface water flood risk to the south (within the wooded area) and to the south of two of the existing buildings.
- 2.10 Two designated statutory sites are located within a 2km buffer of the proposed site (Sullington Warren and Chantry Mill Sites of Special Scientific Interest) and a further eight designated sites are located within a 5km buffer (see the supporting Ecological Impact Assessment), including the Arun Valley Special Area of Conservation to the north-west. The Site falls within the Sussex North Water Resource Zone.
- 2.11 Deciduous woodland is located within the site boundaries as well as directly northeast and south of the site. The Site has two group Tree Preservation Orders – one to the east of the access (LPA ref TPO/0820) and another to the south (LPA ref TPO/1298).
- 2.12 Lowland heath is located 0.5km southwest of the site. Wood pasture and Parkland Biodiversity Action Plan Priority Habitat is scattered within the periphery of the site, with the two areas located 0.4km to the south and 0.8km southwest.
- 2.13 The site lies within the ‘bat sustenance zone’ of the Sussex Bat SACs (The Mens, Singleton and Cocking Tunnels and Ebernoe Common).
- 2.14 The site lies approximately 950m to the north and east of the boundary of the South Downs National Park.
- 2.15 The site is outlined in red in Figure 2 below.





The Site is previously developed land, comprising existing industrial buildings, storage areas and associated hard standing for manufacturing, storage, and distribution of concrete products. The current use of the site falls within Use Class B2 (General Industrial). The site has a strong industrial character.

The Site is well screened by planting and mature vegetation along the majority of its boundaries, including a wide tree belt around the southern section of the site. Existing vegetation is concentrated at the site's boundaries as well as within the two woodland areas to the north of the site.

- 2.18 The immediate surroundings of the site are primarily long-established residential streets to the east, south and west which are generally well screened.
- 2.19 The Site contains no listed buildings, and there are no heritage assets within the Site. The nearest listed buildings are located to the west/north-west of the Site, and include 'Penfold', 'Water Lane Farmhouse', 'Leather Bottle Cottage', and 'Snapes Cottage' (all Grade II listed). There are no Conservation Areas near to the Site.
- 2.20 Landform across the site varies, falling from 75m AOD in the central southern boundary, to 53m AOD in the north-east corner, and 45m AOD in the north-west corner. Retaining wall features are present along the PROW (no. 2625) crossing the centre of the site.
- 2.21 The Site is located in a suitable location for residential development, with existing built form to its immediate east and west, with plentiful services and facilities nearby. The Site contains no major ecological or landscape constraints that would preclude development coming forward.



## 3.0 Planning History

3.1 The relevant planning history for the Site is listed within Table 1 below:

**Table 1: Planning History**

LPA Reference Number	Description	Decision
DC/18/0295	Outline planning application for the demolition of all existing buildings, the erection of 90 dwellings with associated works and the formation of a new access onto Rock Road. All matters to be reserved, except for means of access.	Approved 28 February 2020.
DC/13/0812	Extension to curing sheds (Lawful Development Certificate - Proposed).	Approved 4 July 2013.
DC/05/2193	Use for manufacture, storage and distribution of concrete products (Lawful Development Certificate – Existing).	Approved 21 January 2006.
DC/05/0464	Single storey extension to form lobby and WC and external alterations.	Approved 10 May 2005.
T/16/89	Erection of 6no. four-bedroom detached houses each with double garage. <i>(NB: this site was located on the 'western parcel' at Rock Road).</i>	Refused and Appeal Dismissed 02 June 1990.

3.2 The most recent planning permission (DC/18/0295) was granted in 2020 and was subject to a condition (no.2) which required the submission of an application for reserved matters to be made within 5 years of the permission (i.e. on or before 27th February 2025). Due primarily to the requirements for water neutrality which came into play in September 2021, a reserved matters application was not forthcoming and consequently, the original Outline permission has elapsed. Given the adopted planning policy position for the Council has not changed significantly since that time, this previous consent is still an important material consideration and establishes that the principle of the re-development of this site for residential use is acceptable.

3.3 The dismissed appeal for 6no. detached dwelling on the Western Parcel in June 1990 was primarily dismissed due to the location of the site being outside the defined boundary of



Storrington, and the sufficient supply of housing in the local area at the time. The proximity of the site to the Thakeham Tiles business (which at the time was not proposing to move) was also a concern raised by the Inspector in the 1990 appeal.



## 4.0 The Proposed Development

- 4.1 Outline Planning Permission is sought to renew the previous permission granted <sup>2</sup>for the residential development of the Site together with associated landscaping, parking and access, at Land at Thakeham Tiles, Rock Road, Storrington. The description of the development is as follows:

*'Outline application with all matters reserved except for access from Rock Road for the demolition of existing buildings, and the re-development of the site for up to 108no. dwellings (including a mix of private and affordable housing units), together with associated infrastructure including vehicular, cycle and pedestrian access, parking, landscaping, open space and play provision, and sustainable drainage'.*

- 4.2 As per the previously approved scheme, the application seeks detailed approval for the site's vehicular access only, with all other matters to be reserved for subsequent approval (including matters such as scale, appearance, layout and landscaping). It is requested that the Outline permission continues to include a condition for the same 5-year timeframe as was previously granted.
- 4.3 An Illustrative Masterplan has been submitted with the application which is intended to demonstrate just one iteration of how the proposed development can be accommodated within the Site, with a series of parameter plans to support the eventual design of the scheme.
- 4.4 A development of up to 108no. dwellings is proposed, which includes the provision of 11 on-site affordable housing units. A Viability Statement is submitted with this application to justify this provision.
- 4.5 Vehicular access to the site would be from Rock Road, located broadly centrally along the north boundary of the site frontage, and slightly to the east of the existing access point. The access is proposed to be in the form of a simple priority junction with 2m wide footways connecting the site to the existing footpath network on Rock Road. The internal road network will comprise a mix of shared surfaces and segregated roads/footways to enable safe access for both motorised vehicles and pedestrians/cyclists.
- 4.6 The existing Public Right of Way (PROW 2625) which runs east-west through the centre of the site is to be retained and enhanced.
- 4.7 Parking spaces for cars are to be provided in line with WSCC parking standards (precise number to be confirmed at reserved matters stage), and provision will be made at each dwelling

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<sup>2</sup> DC/18/2095, February 2020



for the safe storage of bicycles. EV charging points would be made available at each dwelling in line with Building Regulation requirements.

- 4.8 A play area is proposed in the centre of the site which offers convenient access for all new residents. Its proposed position adjacent to PROW 2625 also affords the opportunity for neighbouring residents to access this facility.
- 4.9 An attenuation basin is proposed at the north-west corner of the site, which will provide surface water attenuation alongside underground storage crates which will store and release water at controlled rates. An existing borehole is located to the north of the site which has the capacity to provide all potable water required for the proposed homes, although now that water neutrality requirements have been lifted the borehole and the illustratively shown water treatment plant in the northwest of the site is obsolete and will potentially be removed at detailed design stage.
- 4.10 The existing area of protected woodland to the north-east of the site is to be retained and enhanced to create additional biodiversity and habitat opportunities. Save for areas of proposed housing and the attenuation pond; remaining space within the woodland parcel to the north-west of the site will be enhanced for increased woodland habitat.
- 4.11 The existing vegetated boundaries of the site will be retained and enhanced where possible to ensure the site is well contained and continues to contribute to the semi-rural verdant character of the surrounds.
- 4.12 It is proposed that the required 10% net gain in biodiversity value is to be provided on site, as detailed in the accompanying BNG reports.

### **Matters to be Reserved for Subsequent Approval**

- 4.13 The precise mix of dwellings will be established at Reserved Matters (RM) stage, but it is intended that a suitable mix of dwellings will be provided on site in line with the guidance in the Council's latest SHMA and advice from the Council's Housing department on the latest needs in Storrington. At present, the indicative mix of dwellings is proposed as follows but this may be subject to change at RM stage:



**Table 2: Indicative Housing Mix**

Type	Number Proposed	%	Comparison to 2019 SHMA Requirement
1-bed	6	5.5%	5%
2-bed	35	32.4%	30%
3-bed	55	50.9%	40%
4-bed	12	11.1%	25%
<b>TOTAL</b>	<b>108</b>		

4.14 Whilst the below matters are to be established at Reserved Matters stage, it is intended that:

- Parking will be provided for each plot in line with WSCC parking standards (it is envisaged that there will be a total of around 220 parking spaces, through a combination of driveway parking and garages, plus an allocation for visitor parking).
- In accordance with WSCC cycle parking standards, there will be a minimum of two cycle parking spaces per dwelling. Secure and covered cycle parking will be accommodated in garages, or in garden sheds where garages are not provided.
- Each plot would be fitted with an EV charging point in line with Building Regulation requirements.
- The proposed dwellings would be designed to the highest quality, utilising high quality materials that reflect the local vernacular. It is intended that key materials will include a variety of locally sourced materials including red facing brick, clay or slate roof tiles, and external design features including hanging tiles and weatherboarding. The submitted Design and Access Statement details the types of external materials that are envisaged.
- There would be several areas of open space within the site, including the provision of a play area in the centre of the site. Details of how these spaces are designed will come forward at RM stage.





## 5.0 Rationale for Development

- 5.1 Thakeham Tiles is a well-established local company that has owned, occupied and operated from the site since 1933. The site has a long-standing lawful use for the manufacture, storage and distribution of concrete products (decorative walling, block paving, and building blocks, as examples) primarily for the local market. The company is proud to have been expanding successfully over the years and is a valued local employer.
- 5.2 However, the Rock Road site has become unsuitable for the modern manufacturing processes required for a business of this nature. Thakeham Tiles is committed to remaining in the local area, but the company intends to relocate to a more suitable site that can accommodate modern buildings and machinery in order to secure the future growth and success of the business. The intended vacation of the manufacturing business from Rock Road opens the opportunity for this sustainable site to be re-developed for a more suitable purpose.
- 5.3 The desire for the business to re-locate has been long-standing, and this is reflected in the allocation of the Rock Road site for housing by the Parish Council in the Thakeham Neighbourhood Plan (2017). The allocation in the NP recognised that the site is a suitable and sustainable location for new housing.
- 5.4 Within the context of the NP allocation, in February 2020 the site received Outline planning consent for a development of up to 90 homes (Ref DC/18/2095). Due to unexpected external factors since this time (such as the effects on the manufacturing industry caused by Covid 19, as well as the unexpected introduction of the requirement in the Sussex North Water Resource Zone to achieve water neutrality) there has been a delay in the planned re-location of the business, and the '2020 consent' unfortunately expired in February 2025.
- 5.5 The applicant remains committed to re-locating the business and allowing the site to come forward for local housing and wishes to reapply to renew planning permission on this site for a further 5-year period. In the intervening time the applicant has been continuing the search to secure a suitable new business premise within the district. Since 2019, the applicant has been pro-active in its search to secure a new premises, which has included discussions with HDC and with potential site owners; and details of the search efforts can be provided to the Council (confidentially) under separate cover if required.
- 5.6 In the meantime, the business has acquired parcels of land on each side of the existing access which has amended the red line boundary and enabled the vehicular access point onto Rock Road to be improved as well as the delivery of a small quantum of extra housing units.





## 6.0 Statement of Community Involvement

- 6.1 As is best practice, the proposal has been the subject of targeted pre-application engagement with the local community.
- 6.2 The purpose of this engagement is to give local people an opportunity to be involved in the planning process at an early stage and help the application to be determined more quickly by identifying and resolving issues or desired changes as soon as possible.
- 6.3 A public consultation event was held at Thakeham Village Hall on Tuesday 18<sup>th</sup> March from 4-8pm whereby representatives from Thakeham Tiles were present to talk to attendees about the emerging proposals as displayed on a series of boards.
- 6.4 In order to advertise the event, the following activities took place on 5<sup>th</sup> March 2025:
- 188 letters were posted to local residents and key stakeholders inviting them to attend a public consultation event to be held on 18<sup>th</sup> March. Letters were posted by Royal Mail to all residential addresses with a 200m distance from the site;
  - An email was sent directly to all local ward Councillors for the Thakeham, Storrington and Sullington, and Washington wards (Cllr Philip Circus, Cllr Joy Dennis, Cllr Alan Manton, Cllr Emma Beard, Cllr Claudia Fisher, and Cllr Joan Grech) inviting them to attend.
  - An email was sent directly to the respective Parish Council Clerks for the parishes of Thakeham, Storrington and Sullington, and Washington inviting their attendance at the consultation event.
- 6.5 No direct responses to the above emails to the Local Ward Councillors were received.
- 6.6 The exhibition on 18<sup>th</sup> March 2025 was well attended and was busy throughout the evening. 7no. handwritten feedback forms were returned on the night, each containing constructive feedback about the proposals. In addition, an email was received from a local resident following the event which expressly set out that the author did not object to the scheme but wished to highlight their concerns with deficiencies in the local highways network and road safety in the vicinity.
- 6.7 The table below also sets out a summary of the key themes raised at the event, and how the proposal has sought to respond to these.



**Table 3: Response to Consultation Comments**

Summary of Matter Raised	Actions Taken
Traffic concerns on Rock Road (increase in volume, road safety)	The access to the site has been moved to the east of the existing access point which has helped to improve visibility in both directions.
Need for traffic calming, and reduced speed limit	Agreement to the principle of the proposed access arrangement has been provided by Highways Officers at West Sussex County Council in pre-application discussions.
Air quality impacts	A comprehensive Air Quality Assessment has been undertaken, and results and mitigation measures are provided in the accompanying report.
Concerns with loss of trees and biodiversity	Tree loss to facilitate the proposal is inevitable, but proposed tree losses have been minimised as much as possible. As required by law, the scheme has demonstrated that it will provide sufficient retention and enhancement measures to show that a net gain of at least 10% biodiversity will result post-development.
Construction impacts (noise and dust)	As is standard practice, a Construction Environment Management Plan will be required by condition, and this will detail the measures taken to reduce construction impact on neighbouring amenity. This will be enforced by the Council.
Concerns with impact on wider services (GPs, schools etc)	The site is an allocation in the Thakeham Neighbourhood Plan, therefore its impact on local services has already been considered as part of this process. CIL receipts that the development will raise will contribute to the Council's funds to improve education facilities.
Boundary treatments - concerns with overlooking / privacy	The application is proposed in Outline form at this stage; therefore, details of boundary treatments will follow at detailed design stage. Notwithstanding this, the illustrative masterplan has sought to show that the quantum of development proposed can be accommodated with minimal



Summary of Matter Raised	Actions Taken
	losses to boundary vegetation to ensure neighbouring amenity is protected.
Questions about why the business has not moved yet, and will it find a suitable site?	As described in this report, the business has suffered the impacts of covid 19 and the requirements to seek a water neutrality solution (which is now abortive work). In addition, the sharp rise in building costs has worsened the viability of the business' planned relocation. Notwithstanding this, much effort by the site owners has been placed on seeking opportunities for new sites, with varying degrees of success.
Too many houses being built in Thakeham/Storrington	The site is an allocation in the Thakeham Neighbourhood Plan which has been made to address the identified housing needs in the local area. The development of this site will contribute to the local needs and avoids building on greenfield sites.
Questions about the borehole (will it be noisy) and will it affect the well in my garden?	A borehole is now not required to be proposed to abstract water to serve the site since the water neutrality requirements have been lifted.
Location of affordable housing, resident hoping near road access	The precise location of the affordable houses is not determined yet (the application is in Outline form only). When the reserved matters application is submitted, the public will be consulted and will have an opportunity to comment on the details proposed.
PROW - can it be diverted? If not then to upgraded to bridleway, cyclists should not currently use the footpath	There are no plans to upgrade the PROW to a bridleway as part of this proposal, but the route will be improved to ensure it is a more attractive route to use in all weathers.
Frustration with current Bracken Lane visibility on to Rock Road, if more traffic generated from the	The Transport Assessment submitted alongside this application has reviewed road and junction capacity and has concluded that the traffic generated by this development will not cause a severe impact on the highways network. It should also be noted that the re-



Summary of Matter Raised	Actions Taken
<p>development, then will make this more difficult</p> <p>Similar concern with build-up of traffic at the newly installed traffic light system at the Water Lane crossing.</p>	<p>location of the manufacturing business will remove a significant number of large HGVs from the vicinity of the site.</p>
<p>Concern that if the outline is granted for 108 then a developer at RM stage could increase this number.</p>	<p>The parameters set at Outline stage (i.e. for 108 units) sets the maximum number of units permitted. If a development subsequently wants to change this to a higher number, another planning permission would be required which would be scrutinised by the Council. We believe however, that 108 is the maximum number achievable on this site, so it is unlikely that this number will increase.</p>
<p>Resident from Hillside Walk concerned about adequate tree screening if flats positioned near PROW</p>	<p>The Masterplan submitted with the application is illustrative and whilst it shows a small block of flats near the PROW this is not necessarily the position it will go. These details will be applied for and approved at reserved matters stage where planting, boundary treatments and neighbouring amenity will be scrutinised.</p>
<p>Concerns with street lighting within the development</p>	<p>The precise lighting details will be reviewed and agreed at reserved matter stage and are not shown in detail at this point.</p>



## 7.0 Relevant Planning Policy

- 7.1 This section sets out the key relevant planning policy at national and local levels. Section 6 will then discuss the principle of development, as it relates to the relevant policies and why the scheme is considered acceptable when taking account of the adopted plan, and material considerations.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. The following section will first note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of the proposal for the site.

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

- 7.3 The most recently published National Planning Policy Framework (NPPF) was updated in December 2024, and then again in February 2025, and this carries full weight in decision making. The updated NPPF continues to establish a presumption in favour of sustainable development. **Paragraph 2** states that the NPPF is a material consideration in planning decisions.
- 7.4 **Paragraph 8** confirms that there are three dimensions to sustainable development - economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment).
- 7.5 **Paragraph 9** confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies but also taking into account local circumstances to reflect the need and opportunities in each area.
- 7.6 **Paragraph 11** continues to stress that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to-date development plan, or where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
- i) The application of policies in this Framework that protect areas or assets of particular importance ('Footnote 7' areas) provides a strong reason for refusing the development proposed; or



- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 7.7 **Footnote 8** of the NPPF clarifies that the presumption in favour applies in situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites; or, where the Housing Delivery Test indicates that delivery of housing is substantially below (less than 75%) of the housing requirement over the previous three years. This is currently the case in Horsham as a 5-year supply cannot be demonstrated.
- 7.8 **Paragraph 12** states the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. If material considerations in a particular case indicate that the plan should not be followed, local planning authorities may take decisions that depart from an up-to-date development plan.
- 7.9 **Paragraph 14** continues to confirm that where the presumption (at paragraph 11d) applies, the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to outweigh the benefits provided that the neighbourhood plan was made within the previous 5 years, **and** the plan contains policies and allocations to meet its identified needs. The Thakeham Neighbourhood Plan was Made in 2017, and whilst the NP includes allocations to meet the identified needs of the Parish, the plan is now well over 5 years old, and as such the provisions of paragraph 14 do not apply.
- 7.10 **Paragraph 20** relates to strategic policies where it is set out that these policies should make sufficient provision for: housing (including affordable housing), infrastructure, community facilities, and conservation of the natural and built environment.
- 7.11 In terms of determining applications, **paragraph 39** of the framework states that it is a requirement for Local Planning Authorities to approach decisions in a positive and creative way. Planning Authorities should also work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, whilst seeking to approve applications for sustainable development where possible.
- 7.12 **Paragraph 48** reiterates the requirements set out in planning law that applications for planning permission should be determined in accordance with the development plan unless material





considerations indicate otherwise. It actively encourages decisions on applications to be made as quickly as possible.

- 7.13 **Paragraph 56** states that planning conditions can be used to make a development acceptable, where it might otherwise be unacceptable. **Paragraph 57** goes on to say that the use of conditions should be kept to a minimum and only imposed if necessary, relevant, enforceable, precise and reasonable in all respects.
- 7.14 **Section 5** (delivering a sufficient supply of homes) sets out clearly that the Government is committed to significantly boosting the supply of homes (**paragraph 61**) in order to meet local needs and help make sure that land with permission is developed without unnecessary delay.
- 7.15 **Paragraph 63** states that the size, type and tenure of housing needed for different groups in the community should be reflected in planning policies, and should include those who require affordable housing, older people, people with disabilities, travellers, and people wishing to build their own homes.
- 7.16 **Paragraph 70** outlines the importance of small and medium size sites in the contribution to achieving the housing requirement of an area. These sites are often built out quicker and have less infrastructure requirements and associated risk.
- 7.17 **Paragraph 78** requires local planning authorities to identify an annual supply of deliverable sites sufficient to provide a minimum of 5 years' worth of housing calculated against the latest local housing needs figure (plus a buffer of either 5% or 20%). The latest figures published by the Council in the 2024-25 Authority Monitoring Report confirms that the district currently has a 1.0-year supply of housing. A recent appeal decision (Thakeham Mushrooms, 13 June 2025<sup>3</sup>), supports this position in paragraph 58. As such, the Horsham district does not currently have a 5-year housing supply as required by paragraph 78.
- 7.18 **Paragraph 83** seeks to promote sustainable development in rural areas by directing new housing in suitable location where it will help to enhance the vitality of village communities and to enable them to thrive.
- 7.19 **Section 8** seeks to promote healthy and safe communities, with **Paragraph 103** highlighting the importance of providing access to a range of high-quality open spaces and opportunities for sport and physical activity in order to promote the health and wellbeing of communities.
- 7.20 **Section 9** supports the provision of sustainable modes of transport, with **Paragraph 109** stating that transport issues should be considered from the earliest stages of plan making so

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<sup>3</sup> APP/Z3825/W/24/3350094



that opportunities to promote walking, cycling and public transport use are identified and pursued.

- 7.21 **Paragraph 116** is clear that *‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’* [our emphasis].
- 7.22 **Paragraph 117** states that new development should give priority to pedestrian and cycle movements, should facilitate access to high quality public transport, should address the needs of people with reduced mobility, and should be designed to create places that are safe, secure and attractive.
- 7.23 **Section 11** relates to making the most effective use of land to make sure that decisions meet the need for housing as effectively as possible whilst improving the environment and making safe and healthy communities. **Paragraph 129** requires decisions to support developments that make efficient use of land taking into account the identified need for different types of housing and other forms of development as well as the importance of securing well-designed and beautiful, attractive and healthy places.
- 7.24 **Paragraph 125(c)** states that decision should *‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused’*.
- 7.25 Design is covered in **Section 12**, where the Government attaches great importance to the design of the built environment. This policy emphasises that good design is an important component of sustainable development and that it should be inseparable from good planning, which should improve the quality of life in communities.
- 7.26 **Paragraph 131** states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.27 **Paragraph 135** states that new developments should be visually attractive due to good architecture, layout and appropriate and effective landscaping, as well as being sympathetic to local character, history, surrounding built environment and landscape setting.
- 7.28 **Paragraph 170** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 7.29 **Section 15** covers the natural environment. **Paragraph 192** stresses the importance of protecting and safeguarding ecological networks, including national and locally designated





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

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

## Adopted Development Plan

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

### Horsham District Planning Framework

- 7.32 The Horsham District Planning Framework (HDPF) was adopted in November 2015. Those policies of the adopted HDPF of most importance to the application proposals are listed below.
- Policy 1 - Strategic Policy: Sustainable Development
  - Policy 2 – Strategic Policy: Strategic Development
  - Policy 3 – Strategic Policy: Development Hierarchy
  - Policy 9 – Strategic Policy: Employment Development
  - Policy 4 – Strategic Policy: Settlement Expansion
  - Policy 15 – Strategic Policy: Housing Provision
  - Policy 16 – Strategic Policy: Meeting Local Housing Needs
  - Policy 24 – Strategic Policy: Environmental Protection
  - Policy 25 – Strategic Policy: The Natural Environment and Landscape Character
  - Policy 26 – Strategic Policy: Countryside Protection
  - Policy 27 – Settlement Coalescence
  - Policy 30 – Protected Landscapes
  - Policy 31 – Green Infrastructure and Biodiversity
  - Policy 32 – Strategic Policy: The Quality of New Development



- Policy 33 – Development Principles
- Policy 34 – Cultural and Heritage Assets
- Policy 35 – Strategic Policy: Climate Change
- Policy 36 – Strategic Policy: Appropriate Energy Use
- Policy 37 – Sustainable Construction
- Policy 38 – Strategic Policy: Flooding
- Policy 39 – Strategic Policy: Infrastructure Provision
- Policy 40 – Sustainable Transport
- Policy 41 – Parking

### **West Sussex Joint Minerals Local Plan (2018)**

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

- Policy M9 – Safeguarding Minerals

## **Emerging Development Plan**

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

- 7.34 The emerging Horsham District Local Plan (2023 – 2040) was submitted to the Planning Inspectorate for formal Examination on 26 July 2024. Examination Hearings commenced in December 2024 but were paused due to concerns raised by the Inspector about the Duty to Co-Operate and soundness, primarily relating to proposed unmet housing need and water neutrality.
- 7.35 The Inspector wrote to the Council on 4 April 2025 recommending that the emerging plan is withdrawn due principally to its conclusions that the plan failed to meet the Duty to Co-Operate. Owing to changing material circumstances relating to water neutrality and Duty to Cooperate that have recently emerged, the Council wrote to PINS in November 2025 to request that the Hearings are re-opened. The Inspector has responded and has agreed to hold an ‘exploratory meeting’ in February 2026.
- 7.36 Despite the emerging Local Plan being paused, the draft policies and its evidence base still remain a material consideration in decision making and shows a direction of travel for the emerging policies and allocations that the Council supports.



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

- Policy 1 - Sustainable Development
- Policy 2 - Development Hierarchy
- Policy 3 - Settlement Expansion
- Policy 6 - Climate Change
- Policy 7 - Appropriate Energy Use
- Policy 8 - Sustainable Design and Construction
- Policy 9 - Water Neutrality
- Policy 10 - Flooding
- Policy 11 - Environmental Protection
- Policy 12 - Air Quality
- Policy 13 - The Natural Environment and Landscape Character
- Policy 14 - Countryside Protection
- Policy 15 - Settlement Coalescence
- Policy 17 - Green Infrastructure and Biodiversity
- Policy 19 - Development Quality
- Policy 20 - Development Principles
- Policy 21 - Heritage Assets and Managing Change within the Historic Environment
- Policy 23 - Infrastructure Provision
- Policy 24 - Sustainable Transport
- Policy 25 - Parking
- Policy 27 - Inclusive Communities, Health and Wellbeing
- Policy 37 - Housing Provision
- Policy 38 - Meeting Local Housing Needs
- Policy 39 - Affordable Housing
- Policy 40 - Improving Housing Standards in the District



## Thakeham Neighbourhood Plan (2017)

7.38 The Policies contained within the Thakeham Neighbourhood Plan that are considered most relevant to this application are:

- Thakeham 1 – A Spatial Plan for the Parish
- Thakeham 2 – Thakeham Tiles
- Thakeham 6 – Design
- Thakeham 7 – Heritage Assets
- Thakeham 10 – Green Infrastructure and Valued Landscapes

7.39 Policy Thakeham 2 (Thakeham Tiles) allocates the site for housing development, and states the following:

**The Neighbourhood Plan allocates land at Thakeham Tiles, Rock Road, as shown on the Policies Map, for housing development, provided:**

- the development scheme comprises an appropriate number and type/size of dwellings which reflects the character and housing density of the local residential area;
- the scheme layout takes account of the existing footpath on the site; and
- the landscape scheme provides for the retention of as much of the woodland around the edges of the site as possible in order to provide an effective buffer to the adjoining residential area, to provide an amenity for the scheme and to retain local biodiversity value.

## Supplementary Planning Documents and Guidance

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

- Storrington and Sullington Parish Design Statement SPD (2010)
- Planning Obligations and Affordable Housing SPD (2017)
- Community Infrastructure Levy (CIL) SPD (2017)



- County Parking Standards and Transport Contributions Methodology (2020)
- Air Quality and Emissions Mitigation Guidance for Sussex (2020)
- Biodiversity and Green Infrastructure Planning Advice Note (PAN) (2022)
- Shaping Development in the Horsham District Planning Advice Note (PAN) (2025) – *this document was published in September 2025, and supersedes the Facilitating Appropriate Development Planning Advice Note (FAD, 2022)*



## 8.0 Summary of Key Planning Consideration

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

### Principle of Development

- 8.2 The site is allocated for residential development by virtue of Policy 'Thakeham 2' of the made Thakeham Neighbourhood Plan. Whilst the Thakeham NP is over 5 years old (having been made in 2017) it still forms part of the adopted development plan for the district. In addition, the housing land supply position in the Horsham District is such that the tilted balance of NPPF11d is engaged, which directs that applications for housing on sustainable sites should be approved without delay. The allocation of housing in Policy Thakeham 2 of the Thakeham NP continues to carry weight in the planning balance, and alongside other allocations within the plan, should be seen as a minimum requirement for housing delivery in the parish.
- 8.3 Residential development on this site has previously been granted consent by the Council (reference DC/18/2095 – approved February 2020). Whilst this permission has elapsed, given the policy position in Horsham has not changed significantly since 2020 (i.e. the adopted local plan is still the HDPF and the Thakeham Neighbourhood Plan has not been replaced) this previous consent is a material consideration in decision making that carries weight.
- 8.4 As such, as an allocated site in a made Neighbourhood Plan, and with the benefit of a previous permission for residential development; the principle of residential development on this site is considered to be acceptable. The principle acceptability of this site is further supported by the current housing need situation in Horsham, the site's compliance with the Shaping Development in the Horsham District Planning Advice Note, and by virtue of the site's sustainable location – as discussed below:

### Housing Need

- 8.5 As the adopted Local Plan (HDPF, 2015) was adopted over 5 years ago, the Council's housing target is now derived from the Government's Standard Methodology rather than the adopted housing target of 800 dwellings per annum. The government's most recently published Standard Method requires the delivery of 1,329 homes per annum in Horsham (this includes the latest affordability data published in March 2025) and represents a 45% increase on the previous standard method requirement of 917dpa, and a 66% increase from the adopted HDPF housing target of 800dpa.



- 8.6 HDC acknowledged that it is unable to demonstrate a robust five-year supply of housing as required by national policy, with the latest published position showing a 1.0-year supply of housing against the adopted requirement (AMR, 30 April 2025). A recent appeal decision (Thakeham Mushrooms, 13 June 2025<sup>4</sup>) corroborates this position by indicating that the Council can only demonstrate a 1-year supply of housing land against the requirement (para 58). The Inspector for the July 2025 appeal decision to allow an 800-unit development at Horsham Golf and Fitness<sup>5</sup> described the housing land supply position in Horsham as 'lamentable'. As such, it is clear that Horsham district does not currently have anywhere near a 5-year housing supply as required by paragraph 78 of the NPPF, with a shortfall of over 5,000 homes.
- 8.7 The publication of the new NPPF in December 2024 (updated in February 2025) and the new housing targets that accompanied it (1,329 homes per annum), results in a worsening five-year land supply position in Horsham, which will remain until a new Local Plan is formally adopted.
- 8.8 Paragraph 11 of the Framework continues to set out the '*Presumption in favour of sustainable development*' which for decision making means either approving development proposals that accord with an up-to-date development plan without delay, or: where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date granting permission unless:
- i) *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
  - ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*
- 8.9 The Framework directs that where the local planning authority cannot demonstrate a five-year supply of housing land, that development plan policies relevant to the supply of housing are to be considered out of date. As this is the acknowledged case in Horsham, the presumption in favour of sustainable development as set out in paragraph 11d of the NPPF is therefore engaged and applications must be considered positively in line with the '*tilted balance*'.

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<sup>4</sup> APP/Z3825/W/24/3350094

<sup>5</sup> APP/Z3825/W/24/3355546



- 8.10 The latest published housing land supply position of only 1.0-years clearly shows a severe undersupply of housing against the Council's targets and represents a severe shortage in housing across the district. Progression of the new Local Plan has paused, and despite recent correspondence from the examining Inspector, there appears to be no immediate solution to addressing this shortfall at present.

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

- 8.11 In light of the Council's inability to demonstrate a five-year supply of housing sites, as well as the key objective of Government policy to significantly boost the supply of homes; the Council published the Facilitating Appropriate Development document (FAD) in October 2022 which forms a material planning consideration in decision making. An updated version of this document – the Shaping Development in the Horsham District Planning Advice Note (PAN) - was published in September 2025 and confirms that existing allocations in made Neighbourhood Plans will continue to be supported, as will draft allocations in the submitted Horsham Local Plan.
- 8.12 The advice contained in the new PAN does not alter the statutory decision-making framework but sets out the weight that can be given to current and emerging local policy and has been produced to enable the Council to act proactively to continue to deliver housing in a sustainable manner. This interim policy position supports applications that relate to sites already allocated, of which the majority of the Site is, as well as for proposals located outside the defined settlement boundaries where they are sustainable.
- 8.13 The Site is thus supported by the PAN as the vast majority of it is allocated within the Thakeham Neighbourhood Plan (2017). This demonstrates that the site is a sustainable and suitable location for additional housing growth, in the context of the Council's documented housing shortfall.
- 8.14 The two parcels of land either side of the existing site access are acknowledged to be outside of the Built-Up Area Boundary (BUAB) as currently defined. Notwithstanding this, the proposal accords with the requirements of the PAN (paragraph 5.12 which echoes the requirements of HDPF Policy 4) in this respect as:
- It adjoins an existing settlement edge;
  - The level of expansion is appropriate to the related settlement;
  - The proposal meets local housing needs;
  - The impact does not prejudice long term development; and
  - The development is with an existing defensible boundary.





- 8.15 A draft allocation for 55 homes directly opposite the site (north of Rock Road) has been included in the emerging Local Plan at Strategic Policy 18 (STO2). This demonstrates that the application site (including the new parcels of land to the east and west of the site access) are sustainably located and reflective of the character of the built-up settlement.
- 8.16 It is also of note that in the Council's pre-app response (PE/23/0124) the Officer acknowledged that given the application of the '*tilted balance*' the current settlement boundaries as defined by Policy 3 of the HDPF may be considered to be out of date (see page 5), therefore the weight afforded to the identified conflict with adopted policy is likely to be reduced. This point was also made by the Inspector in the July 2025 Horsham Golf and Fitness decision.
- 8.17 In summary, the site is designated for development in the Thakeham NP, it is primarily located within the Storrington settlement boundary, and the two parcels that are located outside of the BUAB accord with the PAN criteria as they directly adjoin. Additional to this (and if the Council were to find that there was any conflict with the development plan), given the present policy position and application of the '*tilted balance*' as described above, alongside the application of the Council's interim policy position detailed in the newly published PAN which carries weight in decision making at this time, it is our view that the principle of residential development of 108no. units on this site is acceptable.
- 8.18 The remainder of this statement details the technical matters in relation to the proposal, demonstrating that there are no barriers to the delivery of the site.

### **Site Location and Sustainability**

- 8.19 The Site is located primarily in the existing Built-Up Area Boundary of Storrington and Sullington which is identified as a 'Small Town and Large Village', ranking second in the settlement hierarchy. Policy 3 of the HDPF states that these are:

*'Settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs...'*

As set out above, Storrington has plentiful services and facilities, and has good accessibility to public transport.

- 8.20 Policy Thakeham1 sets the settlement boundary for the town of Storrington, located within the 'Southern Area' of the Neighbourhood Plan area, and directs development towards locations within the settlement boundaries. The Site primarily falls within the Southern Area policy boundary.



- 8.21 As noted above, it is acknowledged that the two parcels of land either side of the current site access lies outside of the Built-Up Area Boundary, but these parcels directly adjoin the BUAB and therefore accord with all criteria of the Shaping Development PAN. In addition, it should be noted that although the parcel to the east is included within the Site's red line boundary, it is not proposed for any built development, rather it would be retained as enhanced woodland.
- 8.22 The Site also benefits from being allocated for housing development within the Thakeham Neighbourhood Plan (2017), as per Policy Thakeham2, provided:
- *the development scheme comprises an appropriate number and type/size of dwellings which reflects the character and housing density of the local residential area;*
  - *the scheme layout takes account of the existing footpath on the site; and*
  - *the landscape scheme provides for the retention of as much of the woodland around the edges of the site as possible in order to provide an effective buffer to the adjoining residential area, to provide an amenity for the scheme and to retain local biodiversity value.*
- 8.23 This Planning Statement explains how these criteria will be met, and thus Policy Thakeham2 complied with.
- 8.24 In summary, the Site is located for its most part within the existing Built-Up Area Boundary and is proposed for development in the Thakeham Neighbourhood Plan. The Site is undoubtably well located in terms of its links to the existing services and facilities within the 'Small Town and Large Village' of Storrington and Sullington and is within easy walking distance of all facilities within Storrington.

## **Employment**

- 8.25 It is acknowledged that the Site currently provides employment; however, it is not located within a Key Employment Area.
- 8.26 Policy 9 sets out that for employment sites which fall outside Key Employment Areas, development proposals must demonstrate that the site/ premises are no longer needed and/or viable for employment use when being considered for redevelopment.
- 8.27 By virtue of the Site's allocation for residential development, the principle of the loss of employment at the Site has already been accepted. There is no requirement in Policy Thakeham2 to require the existing business is relocate or to be re-provided; nevertheless, for the continuation and expansion of its business, Thakeham Tiles is committed to finding an alternative (more suitable) Site within the district and intends on ensuring existing job opportunities are retained.



- 8.28 The proposed development is thus in accordance with Policy 9 of the HDFP.

## Environmental Impact Assessment (EIA)

- 8.29 It is acknowledged that the overall development site (at 6.12ha) exceeds the 5ha threshold set out for urban development projects (10, part b) in Schedule 2 of the EIA Regs 2017. Notwithstanding this, given the proposal is for less than 150 homes and is located on an allocated site with few landscape and environmental constraints, it is not considered that the site would be classed as EIA development, and an Environmental Statement is not required. It is also noted that the previous application (DC/18/0295) was not judged to be EIA development.

## Landscape and Visual Effects

- 8.30 In support of this application, a Landscape Visual Appraisal (by Lizard Landscape) has been submitted. The LVA concludes that the proposed scheme would have moderate/minor adverse effects on the site's natural elements and overall would have negligible effect on the surrounding landscape character. The LVA considers that there would be minor beneficial improvements to the surrounding landscape character in the long term due to beneficial effects on the setting of the Public Right of Way, and an overall improvement on local character, tranquillity and biodiversity/ecological connectivity.
- 8.31 The visual amenity assessment undertaken in the LVA concludes that even with some vegetation removal, the scheme would have an overall negligible effect on localised and long distant views. With time, the proposed vegetation would mature which would soften and integrate the built form into the surrounding landscape, resulting in minor beneficial effects in the long term.
- 8.32 Also submitted with this application is an Indicative Landscape Masterplan and a Landscape Design Strategy Report (by Lizard Landscape). Whilst indicative at this Outline stage, these documents show what the intentions are for the site's landscape design and open space strategy (including the provision of a formal play area) and sets the foundations for what the subsequent Reserved Matters application will propose in detail.

## Character and Appearance

- 8.33 The proposed development has an approximate gross density of 19 dwellings per hectare (dph) across the entire 6.12ha Site. This is comparable to the previously approved scheme (DC/18/0295) which also had a gross density of approximately 19 dph. This low-density approach is consistent with the character of existing development surrounding the Site and



also allows for areas of public open space and area for formal play to be provided on site, the retention of the existing tree buffers surrounding the site and to maintain a suburban density and form that is reflective of the existing residential development in the immediate area. This is balanced with the need to make effective use of the previously developed site and to enable a viable development that will allow Thakeham Tiles to relocate.

- 8.34 The proposed development seeks to provide a high-quality residential development that responds positively to the character of its surroundings. The parameter plans and illustrative masterplan and landscape plan have been designed to respond to the natural constraints of the site, including the existing boundary vegetation and protected trees, topography, and landscape character to ensure that the size, scale and siting of the proposed dwellings will be appropriate.
- 8.35 In particular, the layout retains as many of the existing trees and hedgerows within the site as possible, whilst also incorporating new tree planting and other biodiversity enhancements.
- 8.36 Accompanying this application is a Design and Access Statement, a Landscape Design Report and an indicative Landscape Masterplan to provide parameters for the future design and an illustrative layout of how the proposed development would sit comfortably in its surroundings (noting that layout and design are reserved matters).
- 8.37 The proposed development has been designed to carefully consider the design and layout of all built form, incorporating appropriate landscaping to ensure the verdant character of the area is preserved. The design of the site seeks to comply with Policies 32 and 33 of the HDPF, as well as the design aspirations required by the Thakeham Neighbourhood Plan (Policy Thakeham6).

## **Affordable Housing and Viability**

- 8.38 The proposal for up to 108 dwellings includes 11no. dwellings proposed as affordable tenure. This equates to just over 10% on-site affordable housing which is acknowledged as being below the target of 35% set out in Policy 16 of the HDPF. In comparison, in approving the previous scheme (DC/18/2095) the Council agreed a reduced affordable housing provision (of 20%, 18 units) which was secured in the associated legal agreement with a review clause to seek the full affordable provision in the event that the business does not re-locate. It is proposed that a similar clause is included in the s106 in relation to this proposal.
- 8.39 Given the affordable housing proposal is below the policy requirement of 35%; in line with NPPF paragraph 59 and the PPG; a Viability Assessment (by Rose Hill Advisors) has been prepared and is submitted in support of the application. Owing to the inclusion of commercially



sensitive information, it is requested that the assessment is kept confidential, but if required, a redacted version can be supplied that can be made public. It is acknowledged that the assessment will be assessed by an external reviewer appointed by the Council and funded by the applicant.

- 8.40 The viability assessment details the constraints of the existing manufacturing site, including its shape, size and location, as well as its aging infrastructure. These factors have led to the aspiration for the business to relocate to more suitable premises whereby the business can continue to flourish and can maintain local levels of skilled employment.
- 8.41 The viability assessment demonstrates that the affordable housing obligation is required to be reduced in order to make the project viable. The assessment details the costs associated with the planned relocation of the business and shows that these have increased significantly faster than revenues since the previous assessment was undertaken in 2018. In addition, the time and costs associated with (now abortive) work to seek a private water neutrality solution have also had a significant impact on the business's finances, and these are reflected in the assessment alongside other unforeseen abnormal costs associated with the relocation.
- 8.42 The assessment concludes that a reduced provision of 10% affordable housing is required in order to enable the business to fund the required relocation to vacate the site for housing development. It is considered that the 10% provision of on-site affordable units is a fair and viable offer that still requires the business to separately fund elements of the relocation including the purchase of new machinery and to bridge the remaining funding gap.
- 8.43 As agreed before, the affordable housing tenure split is proposed to be 50% affordable rent and 50% shared ownership units.

### **Indicative Housing Mix**

- 8.44 The proposed scheme has had regard to the aims and objectives of housing delivery and housing need within the district. Table 2 of this report sets out the indicative mix of unit sizes within the development which comprises a mix of 1, 2, 3 and 4-bedroom homes. This mix is in general accordance with the requirements set out in the latest SHMA and is in line with the requirements of Policy 16 of the HDPF which required housing mix to be appropriate for the site, the locality, and the surrounding character. It should be noted that the mix shown is indicative and will be established at Reserved Matters stage where the final mix and tenure split will seek to accord with the latest evidence on housing needs in Horsham.
- 8.45 It is considered that the proposed range of house sizes and types is suitable both in design terms and in achieving efficient use of the site. The applicant is committed to ensuring that the



proposed scale and density of the development respect the surrounding locality. There is a strong justification for the proposed mix outlined above in regard to both a landscape perspective and the importance of the preservation of the semi-rural surrounds.

## **Access and Highways**

- 8.46 The site is situated within a sustainable brownfield location benefiting from good connections to the strategic road networks of the A264 and A24. Bus stops are also located on Thakeham Road and Water Lane, providing services to Horsham, Midhurst, Petworth and Worthing. There are train stations near to the Site in Amberley and Pulborough which provide connections to Gatwick, London, Crawley, and destinations along the south coast including Portsmouth and Bognor Regis.
- 8.47 Safe and suitable vehicle access to the site will be gained via Rock Road, located broadly central along the northern boundary of the site frontage. The access is proposed to be in the form of a priority junction and achieves the required visibility splays in both directions. 2m footways flank the access road and link to the existing footpath network along Rock Road.
- 8.48 A Transport Assessment accompanies this submission, and details the access arrangements, with the detailed Site Access Plan provided at Appendix C.
- 8.49 The Transport Assessment also details the predicted additional trips that would be generated from the proposed development and concludes that the additional trips would see a notional increase on the existing rates, but that no cumulative impact on highways capacity or safety would result. It is also worth noting that the relocation of the business will result in a significant drop in HGV movement on the local highway network in this location.
- 8.50 In view of the above, the proposed development is acceptable in access and highway terms, and accords with the requirements set out in Section 9 of the NPPF, particularly paragraph 116 which states that applications should only be refused on highways grounds if there would be a severe impact on the highways network. Further details are set out in the accompanying Transport Assessment which demonstrates that the proposal will not result in a significant impact on the local highways network.
- 8.51 A Framework Travel Plan has also been prepared and is submitted in support of the application. This sets out the Travel Plan objectives and targets which primarily relate to encourage alternative and non-car travel options. Travel Plan management measures are also set out which details that a Travel Plan Coordinator will be appointed to administer and monitor the Travel Plan objectives.



## Ecology and BNG

### Ecological Impacts

- 8.52 Two designated statutory sites are located within a 2km buffer of the proposed site (Sullington Warren and Chantry Mill Sites of Special Scientific Interest) and a further seven designated sites are located within a 5km buffer (see Table 3 of the supporting Ecological Impact Assessment), including five further SSSI's and the Arun Valley Special Area of Conservation to the north-west.
- 8.53 Deciduous woodland is located within the site boundaries as well as directly northeast and south of the site. The Site has two group Tree Preservation Orders – one to the east of the access (ref TPO/0820) and another to the south (ref TPO/1298).
- 8.54 The site lies within the 'bat sustenance zone' of the Sussex Bat SACs (The Mens, Singleton and Cocking Tunnels and Ebernoe Common).
- 8.55 In support of the application, an Ecological Impact Assessment (EclA, by The Ecology Co-Op) has been submitted which has identified all ecological constraints associated with the site, as well as any avoidance, mitigation and compensation measures. This concludes that subject to recommended mitigation which can be secured by condition, there will be no significant residual effects with regards to ecology.
- 8.56 Ecological enhancements have been recommended in the EclA which including provision of bat and bird boxes, insect boxes/houses and hedgehog houses, and log piles. It is expected that a Landscape and Ecology Management Plan (LEMP) will be secured by condition. Sensitive lighting measure will also be implemented. It is proposed that the required compensatory credits for the individual trees to be removed will be secured through measures to be outline in the Biodiversity Gain Plan which is anticipated to be secured by condition.

### Biodiversity Net Gain

- 8.57 A Biodiversity Net Gain Report and Outline Habitat Management and Monitoring Plan and Statutory Biodiversity Net Gain Metric (by Ecosupport) have also been submitted with the planning application.
- 8.58 Overall, the proposal results in a **+14.47%** gain in habitat units (+3.57 units), including 0.19 units for hedgerows and 0.17 watercourse units. The submitted Biodiversity Net Gain Report confirms that the required 10% BNG net gain is achieved, however due to individual trees losses that are necessary to facilitate the proposed development, the trading rules for this habitat type are not satisfied and therefore additional BNG units will be required through offsite creation and/or the purchase of offsite credits from a provider.





## Trees

- 8.59 Deciduous woodland is located within the site boundaries as well as directly northeast and south of the site. The Site has two group Tree Preservation Orders – one on the parcel of land to the east of the access (ref TPO/0820) and another to the south (ref TPO/1298). The wooded parcel to the west of the site access is not subject to a TPO.
- 8.60 To facilitate the development, modest tree loss is required. This is the same as the previously approved development, whereby the Council's Arboricultural Officer had no objection.
- 8.61 An Arboricultural Implications Assessment (AIA) and Tree Survey has been submitted with this application. It concludes that subject to the precautions, tree protection, working principles and methodologies set out in the assessment, there should be no adverse impact to the tree rooting systems of retained trees. It is anticipated that these measures can be secured by a suitably worded condition.
- 8.62 The modest loss of trees to facilitate the proposals is considered to be acceptable on balance and is in line with the accepted level of trees loss for the previously approved scheme. The proposed development therefore accords with Policy 24 of the HDFP and Thakeham6 and Thakeham10 of the Thakeham Neighbourhood Plan.

## Heritage Assets

- 8.63 The Site contains no listed buildings, and there are no defined heritage assets within the Site. The nearest listed buildings to the Site are located to the west/north-west of the Site, and include 'Penfold', 'Water Lane Farmhouse', 'Leather Bottle Cottage', and 'Snapes Cottage' (all Grade II listed). There are no Conservation Areas near to the Site.
- 8.64 The supporting Heritage Statement (by Thakeham Concrete Products Ltd) explains the history of the manufacturing business that has occupied the Site since the 1920s.
- 8.65 The proposed development is not expected to have any significant impact on any nearby heritage assets and is therefore considered to be consistent with the provisions of Chapter 16 of the NPPF, Policy 34 of the HDPF, and Thakeham7 of the Thakeham Neighbourhood Plan.

## Flood Risk and Drainage

### Flood Risk

- 8.66 Flood Risk Assessment (FRA) has been undertaken by Stantec (formally Hydrock) and accompanies the submission of this application. The report identifies the site as being located wholly within Flood Zone 1 (very low risk of flooding), and the updated (January 2025) EA





mapping shows the Site has minor areas of 'Low' to 'High' risk (0.1%-3.3% annual probability) across the site including climate change allowances. Section 5.3 of the supporting FRA and Drainage Strategy explains the surface water flood risk in detail.

- 8.67 By virtue of the Site being allocated within the Thakeham Neighbourhood Plan, it is not necessary for a sequential test for flood risk to be carried out, in accordance with paragraph 180 of the NPPF.
- 8.68 Notwithstanding this, the development has followed the sequential approach to the layout and allocation of development within the site. With regards to surface water flood risk, the FRA concludes that the proposed development is suitable in the location proposed in respect of flood risk.

### **Drainage**

- 8.69 The submitted Drainage Strategy and Drainage Strategy Plan (by Stantec) demonstrate how the development will manage surface water and foul water discharge to ensure the development does not increase flood risk elsewhere. The drainage strategy includes a mix of SuDS features (including an on-site attenuation pond and below ground crates), which will store water before being discharged at restricted greenfield rates into a nearby watercourse. The proposed controlled discharge rates will be a betterment on existing brownfield run-off rates.
- 8.70 Foul water generated from the development will be discharged into the existing public sewer on Rock Road, subject to appropriate agreements from Southern Water.
- 8.71 The FRA and Drainage Strategy concludes that flood risk and surface water management can be controlled appropriately and in accordance with the provisions of the NPPF and Policy 38 of the HDPF.

### **Air Quality**

- 8.72 As the proposal is over 10 dwellings and classed as a “major development”, an Air Quality Assessment (by Stantec) has been submitted with the application in line with HDPF Policy 24.
- 8.73 The Air Quality Assessment demonstrates that, subject to good practice measures (as outlined in Appendix E of the AQA), residual air quality and dust impacts during construction are not significant. In addition, modelling undertaken to assess operational air quality impacts on the local area shows there to be no exceedance of key measures; therefore, the operational air quality effects are also assessed as not significant.



- 8.74 The Air Quality Assessment proposes a financial contribution of £14,705 towards local air quality initiatives to offset residual impacts calculated as a “damage cost”. It is envisaged that this would be secured through a legal agreement.

## Noise

- 8.75 A Noise Assessment (by Ian Sharland Ltd) has been submitted with the application to demonstrate that the noise levels generated primarily from traffic on Rock Road to the north of the site is not detrimental to the amenity and health of future residents.
- 8.76 The Noise Assessment identifies that the plots located closest to Rock Road are likely to require acoustic glazing and mechanical ventilation to attenuate external noise levels but notes that noise levels in the external amenity areas would be within the relevant guidelines.
- 8.77 Overall, provided the required noise mitigation is secured at detailed design stage, the Noise Assessment concludes that the site is suitable for the proposed residential development.

## Water Neutrality

- 8.78 One of the key reasons the previous permission (DC/18/2095) expired without the submission of an application for Reserved Matters was due to the unexpected publication of the Natural England Position Statement in September 2021 which required all new developments in the Horsham District to demonstrate water neutrality. This has caused severe delay to the progression of this site and has resulted in significant time delays and expense to seek a private water mitigation solution. The costs associated with the efforts to secure a private water neutrality solution (in the form of an on-site borehole and water treatment regime) have been significant and have severely impacted the viability of the proposed development and business relocation plans as explained in the accompanying Viability Assessment.
- 8.79 In order to achieve water neutrality on this site, detailed work was undertaken to establish the potential for water to be abstracted directly from an on-site borehole. In September 2024, an on-site borehole was drilled into an aquifer that is hydrologically separate from the Southern Water abstraction point at Hardham, and in October 2025 a Licence to Abstract Water was issued by the EA (for up to 48m<sup>3</sup>/day). Accompanying studies have been undertaken to demonstrate that the borehole yields enough water to serve the proposed development and that the water is treatable for potable consumption. Significant time and expense have been attributed to this process, which is now abortive work, and as mentioned, this is reflected in the overall worsening viability of the proposed development.



- 8.80 Despite the efforts the applicant has undertaken to achieve a water neutral development, on 31 October 2025 Natural England issued a Withdrawal Statement<sup>6</sup> confirming that its Water Neutrality Position Statement of September 2021 has been withdrawn.
- 8.81 As the competent authority under the Habitats Regulations, HDC has stated on its website<sup>7</sup> that all development from 1<sup>st</sup> November 2025 onwards can now move forward without the need to demonstrate that the site is water neutral as it did previously. This means that no water neutrality statement is required, and no bespoke mitigation, conditions or s106 obligations are necessary to demonstrate water neutrality. The Council has stated that it intends to continue to undertake Appropriate Assessments (in line with the Habitats Regs and NPPF 193) until the reduced water abstraction licence cap at Hardham is implemented by Southern Water in March 2026.
- 8.82 As such, potable water that is required to serve the proposed 108 homes on this site will be taken from the existing mains supply as was the situation prior to the September 2021 Position Statement. Whilst the on-site borehole and water treatment solution that was intending to be proposed is no longer required, the applicant wishes to continue to include the proposal in this application for the time being, to ensure that a viable solution is in place in the event that any challenge to the Natural England Withdrawal Statement is successful. As such, a Water Neutrality Statement (by H2Ogeo) and Potable Water Feasibility Report (by Stantec) accompany this application which details the measures proposed to ensure the site is water neutral in line with Natural England's previous requirements to avoid any additional impact on the integrity of the Arun Valley sites.
- 8.83 If, at the point of determination, the Council is satisfied that the proposed development can utilise the existing mains supply, then the borehole proposal will be rescinded. We would be happy to work with the Council through the course of the application to come to an agreed position on this and to amend the submitted plans as necessary.

## Energy and Sustainability

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

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<sup>6</sup> [Arun-Valley-Withdrawal-Statement-31.10.25.pdf](#)

<sup>7</sup> [Water neutrality | Horsham District Council](#)



prioritising measures that improve the efficiency of the homes to reduce energy use whilst also reducing costs for future residents.

- 8.85 By doing this it is expected that the development will result in a reduction in carbon emissions against the latest building regulations targets. This accords with the aspirations of the Council's adopted policies on climate (HDPF policies 35, 36 and 37) which supports proposals that meet the energy hierarchy contribute to achieving zero-carbon development and positively contribute to addressing climate change.
- 8.86 An Energy Statement is provided on page 24 of the Design and Access Statement. It is intended that a range of measures will be embedded into the design and function of each new home in order to significantly improve the energy efficiency and carbon footprint of the development as a whole. These measures are likely to include the use of:
- Air Source Heat Pumps
  - EV Charging points to each plot
  - Photovoltaic Panels (PV)
  - Thicker wall cavities
  - Water butts
  - Water saving devices such as low flow taps and showers to reduce water use.
- 8.87 Full details of the measures to reduce both construction and operational resource and energy use can be set out at the detailed design stage.
- 8.88 It is also important to recognise that the sustainable location of the site coupled with its design, landscaping and layout and measures to encourage walking and cycling are also an intrinsic part of reducing energy use and creating a happier, healthier environment for residents now and in the future.
- 8.89 Whilst at this Outline stage it is not possible to provide detailed calculations for the energy use of the scheme, as far as is possible at this stage, the above demonstrates the applicant's commitment to achieving high environmental standards as well as compliance with Policies 35, 36 and 37 of the HDPF.

## **Planning Conditions / CIL / s106**

- 8.90 NPPF paragraph 57 confirms that planning conditions should be kept to a minimum and only imposed where necessary and relevant to planning and the proposed development. It goes



onto confirm that conditions required to be discharged prior to commencement should be avoided unless there is clear justification.

- 8.91 This Outline application intentionally includes sufficient information to minimise the need for additional conditions beyond those that seek further design details at RM stage. However, where Outline conditions are necessary, the applicant is happy for these to be included in order to make the development acceptable to the Council.
- 8.92 The proposal is located within the adopted CIL charging zone; therefore, whilst this application is in Outline form and precise development figures are not confirmed, a CIL Additional Information Form accompanies the submission to acknowledge that the development will be CIL liable.
- 8.93 It is expected that a legal agreement will be required as part of any planning permission. At this stage, it is anticipated that this will cover the following Heads of Terms:
- 11no. Affordable Housing Units (50:50 tenure split)
  - Air Quality Offset Contribution of [REDACTED]
  - BNG Monitoring
  - Off-site BNG enhancements
  - Open space/play provision
  - Travel Plan Monitoring



## 9.0 Summary and Planning Balance

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

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

- The provision of a mix of up to 108no. dwellings in a sustainable location which is already allocated for development in the Thakeham NP, to add to the much-needed housing stock in the district, representing a very substantial benefit in the context of the Council's housing supply and delivery position;
- The provision of on-site affordable housing (11no. dwellings) and a suitable mix of house types and sizes to accord with identified local needs representing a very substantial benefit in the context of the pressing need for housing of all types and sizes;
- Public open space provision and retention and enhancement of existing landscape features for the enjoyment of incoming and neighbouring residents (including PROW improvements), as well as providing private outdoor amenity space for each dwelling;
- Provision of new homes, enabling new residents to support the vitality of existing local facilities such as the schools, local shops, post office and pubs, and enjoying convenient connections to the wider strategic highways network;
- By virtue of the above and the fact that the current manufacturing use of the Site is becoming redundant, making effective use of previously developed land in accordance with the aspirations of the NPPF; and
- Improved amenity conditions for those living in the existing residential properties surrounding the Site, by removing an industrial use as their neighbour.

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

- The generation of employment related to construction;
- Facilitate the long-term retention of jobs in the local area by enabling the business to relocate to a more suitable site;
- Household expenditure and contributions to the local economy by future residents;
- New Homes Bonus payments, CIL receipts, and Council Tax.

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



- Designed to be water neutral to avoid adverse effects on protected habitat sites, and provide a sustainable on site water supply;
- Provision of ecological enhancement measures, including mitigation measures to prevent harm to sensitive habitats and to achieve at least 10% Biodiversity Net Gain;
- Retention and enhancement of existing mature planting along the site boundaries in order to retain the verdant character of the site and to protect wider landscape views;
- Protection from flooding for the lifetime of the development by utilising sustainable drainage systems which also provide ecological and landscape benefits;
- Careful landscape design to produce a development of the highest quality, ensuring it respects the local area; and
- Design of the homes to meet and exceed current environmental standards, to include adopting a fabric first approach and the use of sustainable energy technologies including EV car charging at each dwelling.

9.5 This Statement demonstrates that the proposed development of up to 108no. homes on this Site would deliver multiple benefits, including enabling the relocation and retention of an existing local employer, and the significant benefit of a mix of much needed market and affordable housing in a location that is considered to be sustainably located and consistent in character to the surrounding built up area and form of the village.

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

9.7 The confirmation by the Council that only a 1-year supply of housing is currently being achieved demonstrates the urgent need for housing to be delivered in sustainable locations within the district and triggers the application of the '*tilted balance*'. Not only is the site already allocated for residential development in the Thakeham NP, the development proposal for up to 108 new homes complies with the provisions of the Council's Shaping Development in the Horsham District PAN and makes the most effective use of the brownfield land available whilst creating a beautifully designed place for new residents to live.

9.8 In summary, the benefits that would result from the proposed development are significant, and there are no adverse impacts that would significantly and demonstrably outweigh the delivery of these benefits. As such, having regard to the policies contained within Horsham's adopted and emerging development plans, the Thakeham Neighbourhood Plan, as well as direction from the NPPF and other material considerations identified (including the SD PAN), it is





considered that the planning balance lies in favour of the proposal, and it is requested that planning permission is granted.





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