



APPLICATIONS & APPEALS SERVICES

**DEMOLITION OF EXISTING DWELLING AND
ERECTION OF 1 NO. DETACHED 3 BED
DWELLING AND 1 NO. PAIR OF SEMI-DETACHED
3 BED DWELLINGS WITH PARKING FACILITIES**

AT

**3 STATION ROAD,
BILLINGSHURST RH14 9RF**

PLANNING, DESIGN AND ACCESS STATEMENT

NOVEMBER 2025



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1.0 INTRODUCTION

1.1 Planning permission is sought for the demolition of the existing property and the construction of a detached, two storey three bedroom dwelling, and a pair of semi-detached, two storey 3 bedroom dwellings, with parking provision on land at 3 Station Road, Billingshurst. The proposed dwellings will be accessed via the existing vehicle access from Station Road.

1.2 The details of the proposal will be described and appraised having regard to the following aspects:

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – the planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed additional accommodation;
- **Amount** – the extent of development on the site;
- **Scale** – the physical size of the development;
- **Layout** – the relationship of the proposed extension and alterations to neighbouring properties;
- **Appearance** – details of materials, style and impact upon the visual amenities of the area;

- **Landscape** – impact of the proposal on the existing landscape;
- **Access** – access to the development and parking provision.

1.3 This Planning, Design and Access Statement should be read in conjunction with the accompanying documents including a Preliminary Ecological Appraisal (PEA), Energy and Sustainability Report, and Arboricultural Report and associated drawings.

2.0 PHYSICAL CONTEXT & PLANNING HISTORY

Physical Context

- 2.1 3 Station Road is a detached two storey dwelling located to the northern side of Station Road as the road curves southwards. It lies within the built up boundary of the small town of Billingshurst. The site lies within a residential area.
- 2.2 The area comprises a diverse range of residential properties, which differ in terms of age, size, style and design. The boundaries of the application site are enclosed by a mix of walls, fences and hedges. The existing dwelling is located at the eastern end of the plot on a north/south orientation, with the rear garden running parallel to Station Road. A public footpath runs along the western boundary from Station Road to the centre of the town.
- 2.3 The application site is not located within a Conservation Area or area at risk of flooding (it is in Flood Zone 1, low risk).
- 2.4 The following are photographs of the application site:



South east elevation (front) of existing property



View from eastern corner of site



View west towards Station Road



More distant view



View north from Station Road including site access



View north west along Station Road



Entrance to footpath adjacent to site boundary



View from site entrance



View south east along Station Road



North eastern boundary from parking area



North west elevation (rear) from garden



View north east across garden to Cleve Way



North western end of the plot

Planning History

- 2.5 There is no relevant planning history relating to this site. A pre-application enquiry was made in May 2025 (PE/25/0027). It was advised that there was no objection in principle to the redevelopment of the site, although it was considered that the proposed terrace of 4 dwellings would comprise over development. A copy of the response is attached at Appendix NJA-1.

3.0 PROPOSAL

- 3.1 The proposal is for the demolition of the existing two storey dwelling, and the erection of 3 new properties on the site. These will comprise a pair of semi-detached two storey, 3-bedroom properties at the eastern end of the site, with a further detached two storey 3-bedroom dwelling located to the west of the semis.
- 3.2 The semi-detached dwellings will be identical but handed in design. The eastern-most property will be set slightly forward of its neighbour. The dwellings will have a footprint of approximately 5.8m wide by 9m deep. At ground floor level the accommodation will comprise a kitchen/diner to the front with a large living area at the rear. At first floor level there will be 2 bedrooms (one with en suite facilities) and a family bathroom. The third bedroom will be located in the roof space and will also have en suite facilities. This will be lit through the use of roof lights in the front and rear roof slopes.
- 3.3 The detached dwelling will be very similar to the semi-detached properties. It will be set slightly behind the neighbouring property. It will have a footprint of 5.9m wide by

9m deep. Internally the accommodation provided will be the same, however, the top floor bedroom will have the benefit of two small dormer windows in the front roof slope, with roof lights to the rear.

- 3.4 The properties will be set at the eastern end of the plot to protect the trees at the western end. They will be located between 3.1m – 3.8m back from the edge of the highway due to the curve in the road and the stepped nature of the design.
- 3.5 The dwellings will all be provided with ample private amenity space, with rear garden depths of between 3.9m – 8m. The detached property will have the majority of its amenity space to the west rather than at the rear. Plot boundaries will be marked with 1.8m high 'hit and miss' timber fencing.
- 3.6 Parking for the properties will be provided at the eastern end of the site, perpendicular to the highway, using the existing access point. Cycle racks will be provided in each rear garden area.
- 3.7 The dwellings will be of a traditional design and utilise materials in keeping with the vernacular. The semi-detached properties will have ridged roofs and small gable features to

the front elevations. Simple projecting roofs will protect the front entrance doors. The detached property will have two small dormer windows in the front roof slope instead of the front gable feature. The properties will comprise a brickwork finish at ground floor level, with vertical tile hanging above. Plain tiles will be used for the ridged roof covering the properties.

4.0 PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF) (December 2024)

Sustainable Development

- 4.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework for the preparation of local plans for housing and other development. The NPPF should be read as a whole (NPPF paragraphs 1 and 3).
- 4.2 Paragraph 2 of the NPPF sets out that ***'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements'***.

- 4.3 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has the following three overarching objectives which are independent but need to be pursued in mutually supportive ways:

- a) ***'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
- b) ***a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and***
- c) ***an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy'.***

4.4 Paragraph 10 states ***‘So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).*** For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.

4.5 Where there are no relevant development plan policies or the relevant policies are out of date, the NPPF states that planning permission should be granted unless the application of policies of the Framework that protect areas or assets of particular importance provide a ***strong*** reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. Particular regard should be given to key policies for directing development to sustainable locations, making efficient use of land, securing well-designed places and providing affordable homes, individually or in combination (NPPF paragraph 11 d).

4.6 Paragraph 12 of the Framework states that ***‘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 normally be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed’.

Plan and Decision Making

4.7 Paragraph 34 requires policies in local plans and spatial strategies to be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. In respect of housing, ***‘Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future’.***

4.8 In terms of decision-making, the Framework states at paragraph 39 that ***‘Local planning authorities should approach decisions on proposed development in a***

positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible’.

Housing Provision

4.9 Paragraph 61 states:

‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much as an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community’.

4.10 Paragraph 62 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. Within this context, paragraph 63 requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. These groups include (*inter alia*) people wishing to commission or build their own homes.

4.11 In terms of the provision of affordable housing, NPPF paragraph 65 states that this should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).

4.12 Paragraph 72 requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. Planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption and specific deliverable sites or broad locations for growth for the subsequent years 6-10 and where possible, years 11-15 of the remaining plan period.

4.13 Paragraph 73 sets out that **‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small**

and Medium Enterprise housebuilders to deliver new homes, and are often built out relatively quickly’.

- 4.14 Paragraph 78 requires local planning authorities to identify and update annually a supply of specific, deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of deliverable sites should include a buffer as set out at paragraph 78 a) – c).
- 4.15 To maintain the supply of housing, NPPF paragraph 79 sets out that local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, certain policy consequences should be taken into account as set out at paragraph 79 a) – c).

Highways and Car Parking

- 4.16 Paragraph 109 requires transport issues to be considered at the early stages of plan-making and development proposals.

- 4.17 NPPF paragraph 110 requires the planning system to actively manage patterns of growth. Whilst significant development should be focused on locations which are or can be made sustainable, it should also be recognised that ***‘opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making’.***
- 4.18 Paragraph 112 states that if setting local parking standards for residential and non-residential development, policies should take into account the accessibility of the development, its type, mix and use, the availability of land and opportunities for public transport, local car ownership levels and the need to ensure that adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 4.19 Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or optimising the density of development in city and town centres and other locations that are well served by public transport (paragraph 113).

- 4.20 Paragraph 116 makes it 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, following mitigation, would be severe, taking into account all reasonable future scenarios’.***

Effective Use of Land

- 4.21 Paragraph 124 requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring healthy living conditions.
- 4.22 Paragraph 125 states that planning policies and decision should encourage multiple benefits from both urban and rural land. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. In addition, policies and decisions should promote and support the development of under-utilised land and buildings especially if this would help meet identified needs for housing where land supply is constrained.

- 4.23 Paragraph 128 requires local planning authorities to take a proactive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in place where this would help to meet identified development needs.

- 4.24 In terms of the density of new development, NPPF paragraph 129 encourages the efficient use of land taking into account a number of issues including the needs for different types of housing and other forms of development, the desirability of maintaining an area’s prevailing character and setting (including residential gardens) and securing well-designed, attractive and healthy places.

Design

- 4.25 In terms of design, Section 12 seeks to achieve well designed places sets out that the ***‘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’*** (paragraph 131).

4.26 Paragraph 135 further states that planning policies and decisions should ensure that developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development should also be sympathetic to local character and history and should be designed with a high standard of amenity for existing and future users.

4.27 Paragraph 139 states:

‘Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes: and/or***
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit with the overall form and layout of their surroundings’.***

Climate Change

4.28 Paragraph 161 requires the planning system to support the transit to net zero by 2050 and take full account of all climate change impacts. New development should be planned in ways that avoid increased vulnerability to the range of impacts arising from climate change and to help reduce greenhouse gas emissions, such as through its location, orientation and design.

4.29 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (paragraph 170). Local planning authorities should ensure that flood risk is not increased elsewhere as a result of new development (paragraph 181).

4.30 Applications which could affect drainage in or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff which are proportionate to the nature and scale of the proposal (paragraph 182).

Natural Environment

4.31 Paragraph 187 requires planning policies and decisions to contribute to and enhance the natural and local environment

by (*inter alia*) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils and recognising the intrinsic character and beauty of the countryside. Policies and decisions should also minimise impacts on and provide net gains for biodiversity.

Habitats and Biodiversity

- 4.32 Paragraph 193 states that when determining planning applications, local planning authorities should apply a set of principles and if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated against or, as a last resort, compensated for, then planning permission should be refused.
- 4.33 The presumption in favour of sustainable development does not apply where there would be a significant effect on a habitats site (either alone or in combination with other plans and projects) unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site (paragraph 195).

Ground Conditions and Pollution

- 4.34 Paragraph 196 requires planning policies and decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner (paragraph 197). Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment (paragraph 198).

Local Planning Policy

- 4.35 The 'development plan' comprises the Horsham District Planning Framework (HDPF) (2015) and the Billingshurst Parish Neighbourhood Plan (BPNP) 2019 -2031 (2021). The relevant policies are listed below:

Horsham District Planning Framework (2015)

- Policy 1: Sustainable Development
- Policy 2: Strategic Development
- Policy 3: Development Hierarchy
- Policy 15: Housing Provision
- Policy 16: Meeting Local Housing Needs
- Policy 24: Environmental Protection
- Policy 25: District Character and the Natural Environment
- Policy 31: Green Infrastructure and Biodiversity
- Policy 32: The Quality of New Development
- Policy 33: Development Principles
- Policy 35: Climate Change
- Policy 36: Appropriate Energy Use
- Policy 37: Sustainable Construction
- Policy 38: Flooding
- Policy 39: Infrastructure Provision
- Policy 40: Sustainable Transport
- Policy 41: Parking

The Billingshurst Parish Neighbourhood Plan

- BILL1: Billingshurst Built-Up Area Boundary

- BILL2: Housing Design and Character
- BILL3: Energy Efficiency and Design
- BILL12: Protection and Enhancement of Key Movement Routes
- BILL14: Residential Parking Provision

Emerging Policy

- 4.36 The Horsham District Local Plan 2023-2040 was formally submitted to the Planning Inspectorate on Friday 26 July 2024 for public examination. Hearings commenced, however in a recent letter dated 04 April 2025 the Planning Inspector found that the Duty to Co-operate had not been met and raised significant soundness concerns in relation to the Plan's housing requirement and spatial strategy. As a result, the Planning inspector recommended that the Council withdraw the Plan. The Council has responded to the Inspector's initial findings letter requesting that examination hearings be re-opened. The Inspector is currently considering previously undisclosed evidence before making his decision.

Relevant Legislation and Case Law

4.37 In considering the issue of the principle of the proposed development it is necessary to also consider the legal framework within which planning decisions are made. Planning legislation holds that the determination of a planning application shall be made in accordance with the Development Plan unless material considerations indicate otherwise (as also confirmed at paragraph 2 of the NPPF).

4.38 Specifically, Section 70 (2) of the Town and Country Planning Act 1990 states that in dealing with planning applications, the Authority shall have regard to the provisions of the development plan (so far as material to the application), a post examination draft neighbourhood development plan, any local finance considerations (so far as material to the application) and any other material consideration.

4.39 Section 38(6) Planning and Compulsory Purchase Act 2004 provides:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

4.40 When considering whether or not a proposed development accords with a development plan, it is not necessary to say that it must accord with every policy within the development plan. The question is whether it accords overall with the development plan (see *Stratford on Avon v Secretary of State for Communities and Local Government* (2014)). Even if a proposal cannot be described as being in accordance with the development plan, the statutory test requires that a balance be struck against other material considerations.

4.41 The Courts have emphasised that a planning authority is not obliged to strictly adhere to the development plan and should apply inherent flexibility (see *Cala Homes (South) Limited v Secretary of State for Communities and Local Government* (2011) and *Tesco Stores Ltd v Dundee City Council* (2012)).

4.42 More recently in *Corbett v Cornwall Council* [2020] the appeal court judge emphasised the importance of considering the plan as a whole when he said:

"Under section 38(6) the members' task was not to decide whether, on an individual assessment of the proposal's compliance with the relevant policies, it could be said to accord with each and every one of them. They had to establish whether the proposal was in accordance with

the development plan as a whole. Once the relevant policies were correctly understood, which in my view they were, this was classically a matter of planning judgment for the council as planning decision-maker.”

- 4.43 Paragraph 3 of the NPPF confirms that the Framework should be read as a ‘whole’ and the Government’s National Planning Policy Guidance (NPPG) confirms that ***‘Conflicts between development plan policies adopted, approved or published at the same time must be considered in the light of all material considerations, including local priorities and needs, as guided by the National Planning Policy Framework’*** (paragraph 012 21b-012-20140306).

Housing Land Supply (Case Law)

- 4.44 The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing (paragraphs 72 and 78).
- 4.45 The NPPF requires plans and decisions to apply a presumption in favour of sustainable development (paragraph 11). For decision making, this means approving development proposals that accord with an up-to-date development plan

without delay. Where there are no relevant development plan policies, or the policies most important for determining the application are out-of-date NPPF paragraph 11 d) requires planning permission to be granted 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 demonstrable 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 efficient use of land, securing well-designed places and providing affordable homes, individually or in combination’.***

- 4.46 In respect of criterion (i), NPPF footnote 7 confirms that the policies are those in the Framework which refer to habitats sites (and those listed at NPPF paragraph 189), and/or designated as Sites of Special Scientific Interest, land designated as Green Belt, Local Green Space, a National Landscape, a National Park or defined as a Heritage Coast, irreplaceable habitats, designated heritage assets (and other

heritage assets of archaeological interest) and areas at risk of flooding or coastal change.

- 4.47 NPPF footnote 8 confirms that the policies most important for determining an application includes, for applications involving the provision of housing, situations where a local planning authority cannot demonstrate a five year supply of deliverable housing sites with the appropriate buffer as per NPPF 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.
- 4.48 The ‘Suffolk Coastal’ case (Suffolk Coastal District Council v Hopkins Homes Ltd and Richborough Estates Partnership LLP v Cheshire East Borough Council [2017] UKSC 36) had regard to the meaning and effect of the provisions of the NPPF on housing land supply and the presumption in favour of sustainable development in having regard to the NPPF (2012 version). This is considered to still apply to the present NPPF.
- 4.49 The judgement noted the purpose of the NPPF is to have regard to the Development Plan policies unless these are not determined to be up to date. When the most relevant policies

are not considered to be up to date, the balance is ‘tilted’ in favour of the grant of planning permission unless the benefits are ‘significant and demonstrably’ outweighed by the adverse effects or where specific policies indicate otherwise. Weight is required to be afforded to such policies in the overall tilted balance (NPPF paragraph 11 d).

- 4.50 Importantly, the judgement determined that the decision-taker need not concern themselves with the specific reasons as to what is causing a lack of housing supply but attribute weight proportionally to addressing the problem to significantly boost an adequate supply of housing land (as required by NPPF paragraph 61).

Horsham District Council’s Housing Land Supply Position

- 4.51 NPPF paragraph 61 states that to support the Government’s objective of ‘**significantly boosting the supply of homes**’, it is important that a sufficient amount and variety of land can come forward where it is needed. To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted

using the standard method in national planning practice guidance (NPPF paragraph 62).

4.52 Policies in local plans and spatial strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary (NPPF paragraph 34). In addition, the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing (paragraphs 72 and 78).

4.53 In the case of Horsham District Council, the present HDPF was adopted in 2015; it is therefore significantly over five years old and it does not take into account the standard method in its policies relating to the supply of new homes (specifically HDPF policy 15).

4.54 In addition, the Council's most recent Authority Monitoring Report (AMR) 2023/24 (published 30 April 2025) demonstrates that after an update to the NPPF in December 2024, the housing target is set at 1,357 dwellings per year. The Executive Summary of the AMR confirms:

'For the 2023/24 monitoring year, a total of 452 net dwellings were completed. The latest Housing Delivery Test for Horsham District showed that Horsham had only delivered 62% of its overall housing targets over the previous three years (due to the constraints of Water Neutrality).'

The shortfall in housing delivery, plus a 20% buffer gives a new five year housing target of 9,030. The Council can only demonstrate a 20% (1.0 years) against the new requirement'.

4.55 As the Council cannot demonstrate the necessary level of housing land supply as required by the Framework, the provisions of NPPF paragraph 11 d) (and the *'tilted balance'*) apply to the proposal which must in turn be considered against the Framework's presumption in favour of sustainable development.

4.56 Having regard to paragraph 11 d) i, NPPF footnote 7, the site is not located within a 'protected area' and will have no adverse impact upon assets of particular importance.

4.57 Therefore, the policies of the NPPF do not provide a clear reason for refusing the development and this does not prevent the consideration of the application under the presumption in

favour of sustainable development and the provisions of NPPF paragraph 11 d).

- 4.58 For the reasons set out in this Statement, and having regard to 11 d) ii, there are no adverse impacts of granting planning permission that would **significantly and demonstrably** outweigh the benefits of the provision of 3 new homes (of a high quality design, in a sustainable location which makes effective use of land) when assessed against the policies of this Framework taken as a whole.

Shaping Development in Horsham District Planning Advice Note (SD PAN) (September 2025)

- 4.59 Due to the under provision of housing combined with the delays in progressing the new Local Plan, the Council published a document named Facilitating Appropriate Development (FAD) in October 2022 to provide clarity and guidance in respect of new residential development. This document was replaced in September 2025 with the Shaping Development in Horsham District Planning Advice Note (SD PAN).

- 4.60 The SD PAN is now a material consideration in determining planning applications. The document sets out the Council's aspirations for how development comes forward, and the weight that can be given to current policy within the context of current legislation, national policy and guidance.

- 4.61 In summary, the SD PAN explains the Council's approach to the following:

- The tilted balance;
- The weight of the adopted Horsham District Local Plan (HDPF);
- The status of, and weight to be given to, the emerging Horsham District Local Plan 2023-40;
- The weight given respectively to 'made' and emerging neighbourhood plans;
- Water neutrality (as a summary of other published guidance);
- Importance of the spatial strategy and settlement hierarchy;
- Consideration in principle of applications for housing development;
- Applying local plan policies in current circumstances.

4.62 The SD PAN sets out how the Council will continue to act in a proactive manner by supporting sustainable development that both delivers the development to meet identified needs and ensures that other objectives are met. Importantly, it identifies sites proposed for allocation in the emerging Local Plan and supports these coming forward, as well as supporting the progression of any other sites which align with the Council's spatial strategy.

4.63 As the Council's HDPF is over five years old and because the Council cannot demonstrate a five/four year supply of housing, the Council's policies that affect the supply of housing (HDPF polices 2, 3, 4, 15 and 26) are out of date and should be considered to hold less weight in the decision making process.

4.64 The SD PAN acknowledges that NPPF paragraph 11 d) is a key material consideration in applications for housing development and states that:

'This has the effect of reducing the weight that may be afforded to such policies and engages the 'tilted balance' where there is an expectation that planning applications for housing should be approved.' (paragraph 2.4).

4.65 With regard to the emerging Local Plan, as stated above, the Council has responded to the Inspector's initial findings letter requesting that examination hearings be re-opened. No decision has been made on this request. As such, the SD PAN concludes that having regard to the advice of the NPPF, paragraph 49:

Taking the above together, the general advice is therefore that although the policies of the emerging Local Plan are likely to be material considerations in relation to specific planning applications, the weight to be applied to such policies is, at the time of writing, likely to be limited in most cases. The weight may increase should the examination progress to further stages. (paragraph 2.21)

4.66 In respect of Neighbourhood Plans, as these form part of the Development Plan, the SD PAN confirms (at Section 3) that they are not immune from the requirements of NPPF paragraph 11 d) and as such, policies may be considered to be out of date due to the Council being unable to demonstrate a five year supply of housing. However, NPPF paragraph 14 gives additional support to adopted Neighbourhood Plan which should be taken into account.

4.67 The SD PAN notes at Appendix 1 – Status of Neighbourhood Plans, that the Billingshurst Neighbourhood Plan does not include housing allocations that meet the identified need. As such, paragraph 14 of the NPPF cannot be engaged, the ‘tilted balance’ would be engaged, reducing the weight to be applied to respective neighbourhood plan policies that relate to the supply of housing. The expectation will be that planning applications for housing are approved, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

4.68 The Council has not been able to demonstrate a five-year supply of housing for some time. As a result, the presumption in favour of sustainable development is engaged where water neutrality is demonstrated. However, following the recent North Sussex appeal decision, Horsham District Council published a response to the decision (published 9.10.25), announcing a managed exit from water neutrality restrictions which has been jointly developed through the new Sussex North Water Certification Scheme (SNWCS). Natural England has advised that it intends to withdraw the Water Neutrality Position Statement by the end of October 2025.

4.69 The FAD states that the Council acknowledges that it is likely to receive applications for residential development outside of the defined built-up area boundaries and on unallocated sites as it is unable to demonstrate a five-year housing land supply. Given this, paragraph 5.12 of the SD PAN states that the Council will consider such proposals positively where the following criteria is met:

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

4.70 The above essentially follows the principles of HDPF policy 4 with the exception that it does not contain the same requirement for sites to be allocated for development in the Local or a Neighbourhood Plan.

- 4.71 The current application site lies within a defined built up area, and therefore there is no policy reason as to why the proposal should not be acceptable in principle.

Biodiversity and Green Infrastructure Planning Advice Note
(October 2022)

- 4.72 The Council's Biodiversity and Green Infrastructure Planning Advice Note (PAN) provides guidance on how biodiversity and net gain should be taken into account within development proposals and applicants are encouraged to seek to achieve a 10% biodiversity net gain (BNG) or more.

5.0 DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT

The Principle of Development

- 5.1 NPPF paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives: economic, social and environmental (NPPF paragraph 8).
- 5.2 Paragraph 10 of the NPPF states ***‘So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)’***.
- 5.3 HDPF Policy 1 states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF. Therefore planning applications that accord with the policies of the HDPF will be approved without delay (unless material considerations indicate otherwise). Where there are no policies relevant to the

application, or relevant policies are out of date, Policy 1 states that the:

‘Council will grant permission, unless material considerations indicate otherwise – taking into account whether:

- ***Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or***
 - ***Specific policies in that Framework indicate that development should be restricted’.***
- 5.4 The application site is located within the built-up boundary of Billingshurst and is not within any designated areas which would restrict development, and is therefore acceptable in principle.
- 5.5 Policy 2 (Strategic Development) states that the spatial strategy is to (*inter alia*):
- ***Continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period.***

- ***Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.***
- ***Support development which protects, conserves and enhances the District's built heritage whilst ensuring that new development is safe, well designed, adapts to climate change and helps to reduce the District's carbon emissions.***

It will be shown that the proposal meets these requirements.

- 5.6 Policy 3 (Development Hierarchy) states that development will be allowed within towns and villages that 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 the characteristics and function of the settlement in accordance with the settlement hierarchy set out within the Policy. Billingshurst is categorised as a 'Small Town and Larger Village'. Such settlements are defined as those 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, but also

have some reliance on larger settlements/each other to meet some of their requirements.

Housing Land Supply

- 5.7 As set out at Section 4, the Council is unable to demonstrate a five year supply of housing as required by the NPPF. The latest AMR confirms that the Council can now only demonstrate only a 1 year supply. As a result, it the Council's policies in respect of the supply and location of new homes (HDPF policies 2, 3, 4, 15 and 26) are out of date and should be given less weight in the decision making process. The tilted balance of NPPF paragraph 11 d) is engaged and the proposal should be considered against the presumption in favour of sustainable development.
- 5.8 There is no conflict with NPPF paragraph 11 d) (i). This Statement further confirms that overall there are no adverse impacts of granting planning permission for the proposal that would significantly and demonstrably outweigh the benefits of the provision of a new home of a high quality design, in a sustainable location and which makes effective use of land.

5.9 The revised NPPF (December 2024) introduces a new Standard Method for calculating local housing need which significantly increases the level of housing that local authorities should plan for to achieve the Government's target of 1.5 million new homes for the present Parliament. It has also reinstated the requirement for local authorities to maintain a five-year supply of housing, as opposed to a reduced four-year supply (under certain circumstances) set out in the NPPF December 2023 version.

5.10 There is as such a significant need to build new homes and proposal will positively contribute towards the supply of windfall homes within the district. This is an important source of supply as noted at NPPF paragraph 73 which states that

'Small and medium sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly'.

5.11 As stated above, the application site is located within the settlement boundary of Billingshurst which is categorised by HDPF Policy 3 as a small town/larger village and is one of the

main settlements within the district. Occupiers of the proposed dwellings will be able to easily access local services and facilities within Billingshurst, as well as using good public transport links to access goods and services further afield.

5.12 The proposed development meets local housing needs in respect of the clear need for new housing within the district and the impact of the proposal will neither individually nor cumulatively prejudice comprehensive long term development.

5.13 In summary of HDPF policies 1, 2, 3 and 4, these policies encourage sustainable development and allow for development within the built up area boundaries where the level of expansion is appropriate to the scale and function of the settlement type.

5.14 Given the small scale of development proposed, the sustainable location of the application site the proposal does not conflict with the overarching principles of the Council's development strategy or the Council's FAD.

Efficient Use of Land

5.15 Paragraph 124 of the NPPF states that ***‘Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions’***. Paragraph 128 requires that a positive approach is taken to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs.

5.16 The proposed dwellings make efficient use of the land available, providing a net gain of two new homes which are important given the very large undersupply of housing in the District. The proposal fully accords with the principles of sustainable development set out within the NPPF in respect of making effective use of land.

Sustainable Development

5.17 Given that the tilted balance at NPPF paragraph 11 d) is engaged in this case, it is reiterated that the proposal should be considered against the presumption in favour of sustainable

development set out within the Framework. Having regard to the three key objectives of sustainable development set out at paragraph 8 of the NPPF, the proposed development complies as follows:

- a) an economic objective – the proposal will make a small contribution to the local building industry and associated trades in constructing the new dwellings. Furthermore, occupiers of the new dwellings will help to support local services and facilities. The proposal complies with the economic objective of sustainable development.
- b) a social objective – the proposal provides a suitable site for the creation of three new dwellings in close proximity to local services and facilities including schools, public transport and work opportunities. The proposal will also make a modest but important contribution to the supply of new homes within the district (contributing towards the Council’s windfall target). The proposal complies with the social objective of sustainable development.
- c) an environmental objective – The proposal makes effective use of land and no harm will result to the visual amenities of the area. The proposed dwellings are sustainably

located and of a highly sustainable design. This planning application is also supported by information in respect of ecology and trees. The proposal complies with the environmental objective of sustainable development.

6.0 LAYOUT, DESIGN & APPEARANCE

Design

- 6.1 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. Developments should be visually attractive and sympathetic to the local character of the surrounding area and should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (paragraphs 131 and 135).
- 6.2 HDPF policy 32 requires high quality design for all development in the District. In addition, HDPF Policy 33 sets out the Council's key development control criteria and states that development should make efficient use of land, should not cause harm to neighbouring residential amenities, should be appropriate in scale, massing and appearance and be of a high standard of design. Development should also be locally distinctive in character and should use high standards of building materials, finishes and landscaping.

- 6.3 HDPF Policy 33 (text in bold italics) is addressed in detail as follows:

In order to conserve and enhance the natural and built environment developments shall be required to:

1. Make efficient use of land and prioritise the use of previously developed land and buildings whilst respecting any constraints that exist.

- 6.4 The proposed development makes effective use of previously developed land within a designated built up area. The proposal complies with criterion 1.

2. Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise, whilst having regard to the sensitivities of surrounding development;

- 6.5 The proposed dwellings are replacing an existing dwelling on the site. They will be located an appropriate distance away from existing properties to ensure that there would be no unacceptable overbearing, overshadowing or increase in overlooking impacts upon the residential amenity of neighbouring properties. The dwellings will be provided with adequate amenity space and parking facilities.

6.6 It is also considered that the proposed (small scale) development will not give rise to any material increase in noise or disturbance. The proposal complies with criterion 2.

3. Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;

6.7 The height, scale and massing of the proposed dwellings respects the established scale of neighbouring development and the topography of the site.

6.8 The dwellings will be appropriately screened, and no harm will be caused to any important views. The new dwellings will fit comfortably within their surroundings, and they will reflect and respect nearby plot sizes.

6.9 The mature screening to the wider boundaries of the application site will be retained to help to screen the new dwellings from public view and assist with their integration into the surroundings. The proposal complies with criterion 3.

4. Are locally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments;

6.10 The application site is located within an existing residential area, and the new dwellings have been designed so as to not conflict with the established character of the area, and to integrate with the varied architectural styles existing locally along Station Road and Cleve Way. The application site provides the opportunity to deliver additional housing without adversely impacting upon the established character of the wider locality. The proposal complies with criterion 4.

5. Use high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate;

6.11 The materials used in the construction of the proposed dwellings will reflect those already present within the area including brick and tile hung elevations, with plain tiled roofs. The proposed dwellings will integrate appropriately into the site and will not be harmful to the established character and

appearance of the area. The proposal complies with criterion 5.

6. Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development; and,

6.12 The existing boundary planting will be retained where appropriate to protect the established character of the site. The proposed dwellings will relate sympathetically to the local landscape and new landscaping can be achieved to further enhance the site. The accompanying Arboricultural report indicates that the development can be carried out whilst maintaining the TPO Ash tree found within the site and those TPO trees outside the site boundary.

6.13 In respect of trees, the planning application is submitted with an Arboricultural Report (and associated plans) which reports on the survey of trees at the application site and within influencing distance of the proposed development, and suggests appropriate protection methods and ongoing maintenance.

6.14 The proposal complies with criterion 6.

7. Ensure buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with the character of the surrounding townscape, landscape or topography where it is of good quality.

6.15 The dwellings will be built to be thermally efficient and in accordance with the latest Building Control standards. The Energy and Sustainability Statement which sets out the approach that the Applicant is proposing to adopt to ensure that the proposal meets high standards of sustainability. This includes the installation of Air Source Heat Pumps (ASHP) to meet the heating and hot water requirements of the dwellings. Underfloor heating will have full time and temperature zone controls meaning that energy is only used as and where required. There is no conflict with HDPF policies 35, 36, 37 and 38.

Proposals will also need to take the following into account where relevant:

8. Incorporate where appropriate convenient, safe and visually attractive areas for the parking of vehicles and

cycles, and the storage of bins/recycling facilities without dominating the development or its surroundings;

9. Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area; and create visually attractive frontages where adjoining streets and public spaces, including appropriate windows and doors to assist in the informal surveillance of public areas by occupants of the site;

10. Contribute to the removal of physical barriers; and,

11. Make a clear distinction between the public and private spaces within the site.

- 6.16 The site will be accessed the existing vehicle access to Station Road. Appropriate car parking and turning together with the discreet storage of refuse and recycling bins ensuring no adverse impacts upon the surrounding locality will be provided.
- 6.17 The proposed development does not conflict with parts 8, 9, 10 or 11 of policy 33.
- 6.18 In summary, the proposed dwellings are considered to be of a scale, height, mass and design that is appropriate to the character of the site's surroundings including built form and residential character. The proposed dwellings can be easily accommodated within the site with sufficient space retained to

the boundaries to ensure that they will not appear cramped. Adequate amenity space is proposed for each of the dwellings.

- 6.19 With no harm caused to the nearby townscape and landscape or in respect of residential amenity, the proposal complies in full with HDPF policies 24, 25, 26, 32 and 33.

Trees

- 6.20 A full Arboricultural report accompanies this application. The site does not fall within a Conservation Area, but there are existing Tree Preservation Orders (TPO) in place for the Ash tree T3 within the site, and also a separate TPO for the other two trees that sit outside the site - a Horse Chestnut and an Oak tree. A number of trees of varying species, size and age are to be found both on the site and just over the boundary.
- 6.21 The Report identifies that the trees that need to be removed are T1 Conifer tree (Class C - tree of low quality) and T2 Tulip Tree (U Class - trees unsuitable for retention).
- 6.22 With respect to the protected Ash tree the report states:

*The Ash tree T3 has a total RPA of 248m² and the footprint of the new detached house has an incursion of 11m², allowing for foundation works to slightly increase this figure it is still within acceptable limits. The roof of the detached house may interfere with the outer reaches of the canopy of the Ash tree and it is therefore noted that some lifting, or canopy reduction of the tree in that area maybe required. Whilst this is undertaken inspection of the black fungal growth located at 8m high on the end of a main branch to the south can be carried out. If this is *Inonotus hispidus* which causes a white rot in the trunk, then it is recommended that the local Tree Officer be informed and appropriate action be taken for the health of the tree.*

6.23 The report also states:

An improvement to be gained with this scheme is the removal of the sheds and pathway found within the rear garden at present. The removal of these items will allow the Ash tree T5 improved ground conditions for the roots of the tree. It is recommend that no sheds or paths are re-instated after the works have concluded to provide a permanent improvement in this regard.

6.24 With respect to neighbouring protected trees, the Report states:

The Oak tree T6 sits outside the site boundary, however, the roots and canopy over sail the car parking area. This area is

block paved and is already used for parking, but provision for a more permeable surface for the new parking area will be required. The removal of the existing surface and installation of the new materials will require monitoring to ensure that the root system of T6 is maintained in good condition and not damaged during this operation. Ground protection will be required for the duration of the build to ensure compaction of the ground this area is not compromised.

And:

All the remaining trees found outside the site are situated outside the building zone. However, in order to protect the root zones and canopies of the remaining trees a Construction Exclusion Zone is to be arranged with tree protection fencing erected across the site, as shown on the Tree Protection plan

6.25 In terms of the landscape implications of the development the Report states:

The houses and their associated parking (which will be required to be permeable) will not interfere with the remaining trees, so there are no negative implications as regards landscaping. It is recommended that a permeable surface such as Ecogrid 40 be used and filled with crushed 14-20mm stone to both improve and maintain a surface suitable for parking and the roots of the Oak tree T6.

6.26 In terms of the future of the site, the Report states:

The design of the development, together with the orientation of the site is such that issues involving trees (e.g., shading, privacy, screening, direct damage, future pressure for removal) are not considered to be significant issues. The canopy of the Ash tree T3 will offer some shading to the detached house, but the majority of the daylight hours are accessible for this property and the others are unaffected by this issue.

6.27 The Report concludes:

The site offers potential to build the three houses as shown whilst maintaining the TPO tree found within the site and those TPO trees outside the site boundary. The construction work will have a minimal impact of the Ash tree T3 and the canopy offers minimal interference with the roof as only the outer reaches of the canopy come close to the proposed new build. The removal of the garden path and wooden sheds will offer an improvement in ground conditions for the Ash tree T3. In addition constructing a permeable parking area will offer a permanent improvement for the root are affected in regard to the Oak tree T6.

6.28 The Report clearly outlines the proposed protective measures to be implemented during the build within the Arboricultural Method Statement & Tree Protection Plan section of the

Report. These can be achieved by way of an appropriately worded condition on any forthcoming planning permission.

6.29 It is concluded that the proposal retains important trees both on and adjacent to the site, and that the development will not cause harm to those trees. The proposal meets the requirements of HDPF Policy 31.

Biodiversity

6.23 The NPPF seeks to ensure that planning policies and decisions enhance the natural and local environment (paragraph 187) including by minimising the impacts on and providing net gains for biodiversity. NPPF paragraph 193 sets out principles in respect of biodiversity that planning authorities should apply when determining planning applications.

6.24 This planning application is accompanied by a PEA which identifies the likely ecological constraints associated with the development and sets out mitigation measures that are likely to be required. It is confirmed that the proposed development will be carried out in accordance with the stated mitigation and

ecological enhancement measures to ensure compliance with the NPPF in respect of biodiversity and HDPF policy 31.

7.0 ACCESS AND PARKING

- 7.1 The NPPF sets out at paragraph 116 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.
- 7.2 HDPF Policy 40 requires (*inter alia*) new development to be appropriate in scale to the existing transport infrastructure. Development should also minimise the distance people need to travel. In respect of car parking, HDPF Policy 41 states (*inter alia*) that adequate car parking must be provided within new developments.
- 7.3 Sufficient car parking provision is provided for each dwelling. The proposal complies with HDPF policies 40 and 41. The proposal utilises the existing access on to Station Road. It is considered that the slight increase in the number of vehicles utilising this access is unlikely to result in any highway safety concerns.

8.0 CONCLUSION

8.1 This Statement supports an application for planning permission which seeks the demolition of the existing property and the construction of a detached, two storey three bedroom dwelling, and a pair of semi-detached, two storey 3 bedroom dwellings, with parking provision on land at 3 Station Road, Billingshurst.

8.2 As set out at Section 2, case law confirms when considering whether a proposal complies with a development plan, it is not necessary to say that it must accord with every policy of the development plan and the question is whether it accords with the development plan overall. In addition, paragraph 3 of the NPPF confirms that the Framework should be read as a 'whole' and the Government's Planning Policy Guidance (PPG) states that any conflicts between the development plan should be considered in light of all material planning considerations including local priorities and needs, as guided by the NPPF.

8.3 Therefore it is necessary to consider the following aspects of the proposal in the planning balance:

- The Council's HDPF is over five years old and the Council is unable to demonstrate a five year supply of housing as

required by the NPPF. As a result, the Council's policies in respect to the supply and location of new homes are out of date and the provisions of NPPF paragraph 11 d) and the tilted balance are engaged. The balance is 'tilted' in favour of the grant of planning permission unless the benefits are '**significant and demonstrably**' outweighed by any adverse effects or where specific policies indicate otherwise. In this instance, there no adverse impacts and there are no specific policies which indicate that planning permission should be refused.

- The proposal will make a small but important contribution towards windfall housing provision within the District. The cumulative provision of individual homes should not be underestimated as acknowledged by NPPF paragraph 73. The long term continued lack of housing supply within the District undermines the NPPF's intentions to 'significantly boost' the supply of new homes (NPPF paragraph 61).
- The proposed dwellings will be sustainably located, within the built up area boundary of Billingshurst. Occupiers of the proposed dwellings will be able to access the varied local services and facilities within Billingshurst without necessarily relying on the use of the private car. It is

demonstrated that the proposed development would not conflict with the intentions of HDPF policy 4 and the provisions of the Council's FAD must also be taken into account in light of the current under supply of housing within the District.

- The proposed dwellings will not be remote from other built form and they have been carefully designed to ensure that both are of a high quality construction and appearance and of an appropriate height, scale and mass. As a result and given the appropriate design and scale of the proposed dwellings, there will be no significant impact upon views and no harm caused to the visual amenities of the area.
- The proposal makes effective use of land as encouraged by the NPPF. No harm will be caused to neighbouring amenity. The dwellings will be of a highly sustainable design and construction.
- The protected trees on and adjacent to the site are retained, and protected for the future.
- Sufficient car parking and vehicle access is provided in accordance with HDPF policies 40 and 41.

8.4 This Statement demonstrates that there are no adverse impacts of granting planning permission that would **significantly or demonstrably** outweigh the benefits of three new homes of a high-quality design, in a sustainable location and which make efficient use of land. The proposal will make a small but important contribution towards the supply of much needed new homes within the district without resulting in any harm to the local environment or significant conflict with the Council's spatial strategy. Therefore, in accordance with paragraphs 11 and 39 of the NPPF and HDPF Policy 1, planning permission should be granted for the sustainable development proposed.