



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0826

Toat Cafe, Stane Street, North Heath, West Sussex, RH20 1DN

DESCRIPTION:

Outline Planning Application for up to 93 residential dwellings (including 35% affordable), pharmacy, shop/cafe and open space, all matters reserved except access.

RELEVANT PLANNING HISTORY

PE/25/0141	The removal of all the existing buildings on site and their replacement with 93 housing units and the provision of a new vehicular access into the site	Pre-Application Advice Given on 05.08.2025
DC/14/2481	Retrospective approval for car wash canopy at Toat Cafe Site	Application Permitted on 06.01.2015
DC/13/2321	Retention of 2 x canopies used for approved car washing facilities	Application Permitted on 01.04.2014
DC/12/1881	Continuation of manual car wash (previous consent on DC/09/1341)	Application Permitted on 17.01.2013
DC/09/1341	Continuation of manual car wash (previously approved under DC/06/0636)	Application Permitted on 14.10.2009
DC/06/0636	Provision of hard standing and use of land as car washing facility.	Application Permitted on 09.05.2006
PL/6/94	Replacement & extension of toat cafe to a new motel	Application Permitted on 19.02.1996

DESCRIPTION OF THE SITE

The application site comprises the Toat Café and surrounding land located on the western side of the A29 north of Pulborough. At the closest point the site is 250m to the north the Codmore Hill Built-Up Area Boundary (BUAB), as extended by the recently made Pulborough Neighbourhood Plan, and 1.8km north of the Pulborough BUAB. The application site is approximately 6.5 ha and comprises of three separate field parcels bound by mature hedgerow and treelines. At present the north eastern field adjacent to the A29 comprises of an area of hard standing, Toat Café, a hand car wash and a large area of undeveloped grassland. The western field remains undeveloped, with the exception of a disused agricultural barn, and the southern field is also undeveloped with the exception of disused agricultural stables. The site also includes a residential dwelling (Stanes Cottage) and 4 mobile homes located within a separate area of residential curtilage.

The north eastern portion of the site (3ha) is allocated for a range of commercial and tourism uses within the Pulborough Neighbourhood Plan (Policy 8) including B2 (General industrial), B8 (Storage or distribution), C1 (Hotels), E (Commercial, Business and Service), F1 (Learning and non-residential institutions); F2 (Local Community), motor sales showrooms and leisure parkland.

Within the wider context, the South Downs National Park is approximately 525m to the northwest and a Grade II Listed Building (Mill House) is to the southeast of the site, across Stane Street (A29).

The site falls within Flood Zone 1 with EA mapping indicating the sporadic presence of some limited surface water flood risk.

The site falls within the Bat Sustenance Zone for the Mens SAC.

Public Right of Way PROW_1986 runs along the northern and western site boundary.

DESCRIPTION OF THE APPLICATION

The application seeks outline permission for up to 93 residential dwellings (including 35% affordable), a pharmacy, shop/cafe and open space. All matters are reserved except access which is proposed as a three-arm roundabout off Stane Street (A29).

Whilst matters of site layout are reserved, an indicative layout shows two main buildings within the northern portion of the site including 1, 2 and 3 bed flats and the shop, café, and pharmacy. The south eastern portion of the site is indicated as a mix of detached, semi-detached, and terraced dwellings whilst the western field parcel is proposed to include a SuDS basin and pump track. All existing structures would be removed.

BNG is also proposed to be delivered in the southern part of the western field, in an area which falls outside of the red line boundary.

RELEVANT PLANNING POLICIES

National Planning Policy Framework (Dec 2026)

S3: Presumption in favour of sustainable development

S4: Principle of development within settlements

S5: Principle of development outside settlements

S6: Neighbourhood plans and the presumption

CC2: Mitigation of climate change

CC3: Adaptation to climate change

HO7: Meeting the need for homes

HO8: Providing affordable homes

E2: Meeting the need for business land and premises

E4: Rural business development

TC3: Main town centre uses outside town centres

M6: Safeguarding mineral resources and infrastructure through decision-making

L2: Making effective use of land

L3: Achieving appropriate densities

DP3: Key principles for well-designed places

DP4: The design process

TR3: Locating development in sustainable locations

TR4: Street design, access and parking

TR5: Roadside facilities

TR6: Assessing transport impacts

TR8: Public rights of way

HC3: Community facilities and public service infrastructure serving new development

P2: Ground conditions

P3: Living conditions and pollution

P4: Impact of development on existing activities

F4: Assessing flood risk for decision-making

F5: The sequential test

F6: Development in areas at risk of flooding from rivers or the sea

F7: Ensuring development is safe from flooding

Contact Officer: Sam Whitehouse

Tel: 01403 215206

F8: Sustainable drainage systems and watercourses
N2: Improving the natural environment
N3: Trees in new development
N4: Protected Landscapes
N6: Areas of particular importance for biodiversity and geodiversity
HE4: Securing the conservation of heritage assets
HE5: Assessing effects on heritage assets
HE6: Proposals affecting designated heritage assets

Horsham District Planning Framework (HDPF 2015)

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 7 - Strategic Policy: Economic Growth
Policy 9 - Employment Development
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 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
Policy 42 - Strategic Policy: Inclusive Communities
Policy 43 - Community Facilities, Leisure and Recreation

Pulborough Neighbourhood Plan (October 2025)

Policy 1: A Spatial Plan for the Parish
Policy 8: Toat Café, Stane Street (PPNP27)
Policy 15: Design

Horsham District Local Plan (2023-40) (Regulation 19)

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 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 28: Community Facilities, Leisure and Recreation
Policy 29: New Employment
Policy 37: Housing Provision
Policy 38: Meeting Local Housing Needs
Policy 39: Affordable Housing
Policy 40: Improving Housing Standards in the District

West Sussex Joint Minerals Local Plan (2018) (Partial Review March 2021)

Policy M9 - Safeguarding Minerals

Supplementary Planning Guidance:

Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)
WSCC Parking Guidance (2003 as amended Sep 2020)
Open Space, Sport & Recreation Review (June 2021)

Planning Advice Notes:

Shaping Development in Horsham District (Sept 2025)
Biodiversity and Green Infrastructure

Parish Design Statement:

Pulborough Design Statement (May 2013)

REPRESENTATIONS AND CONSULTATIONS RESPONSES

Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk.

Internal Consultations

HDC Arboricultural Officer: No Objection

[Summary] Tree removals required to achieve access engineering do not involve any of the mature trees of stature that make a positive contribution to the landscape setting. Arboricultural impacts for a scheme of the quantum proposed could be reasonably controlled by condition of any subsequent reserved matters application to provide layout/landscaping etc. subject to a design being submitted that recognises the constraints posed by trees both in terms of direct impacts and foreseeable indirect impacts and pressures that a change of use of the land can impose.

HDC Conservation: No Objection

The Officer has outlined there will be no direct impact to designated or non-designated heritage assets except that impact to Stane Street resulting from the modern traffic intervention of the roundabout. Stating: I am generally satisfied with the conclusion reached in the accompanying heritage statement regarding the impact to the settings of the surrounding designated heritage assets. However, the setting of Mill House, a grade II listed building will be impacted to a greater extent than the setting of the other neighbouring historic buildings. I am satisfied the dilution of the rural setting of Mill House will result in less than substantial harm but at the lowest end of that scale. I am willing to accept that the proposal may result in a level of public benefit through sustainable development such that this will outweigh that harm.

HDC Environmental Health (Noise): Further information required

[Summary] The officer notes that road noise from the A29 is very noticeable within the site, and that the proposal including commercial elements with the potential for fixed plant and delivery vehicles. A noise impact assessment is requested and for the layout of the development is requested to be designed in accordance with ProPG: Planning & Noise.

Contact Officer: Sam Whitehouse

Tel: 01403 215206

HDC Environmental Health (Land Contamination): Further information required

[Summary] The Officer has reviewed the Ashdown Preliminary Ground Contamination Risk Assessment Report, dated 14.05.26 and has requested further clarification regarding missing or illegible details within the report and appendices. The Officer has additionally confirmed that these details can be secured via condition.

HDC Environmental Health (Air Quality): Further information required

[Summary] This proposal is classified as a major development; therefore, the applicant must submit an Air Quality Assessment and an Emissions Mitigation Statement, including a damage cost calculation. Mitigation measures for the proposed development should align with the Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex.

HDC Housing: Further information required

[Summary] The Officer noted the proposed provision of 35% affordable housing and the indicative housing mix provided. Additional information is also requested regarding a Registered Provider interest in the site and bringing the affordable housing provision.

HDC Waste & Recycling: Further information required

[Summary] The Officer has requested additional information pertaining to bin-store locations and a Refuse Strategy and Swept Path Analysis for the internal layout.

HDC Ecology / BNG: Holding objection / Modification

[Summary] The development will have a -50.15% net loss (-9.14 units) in area habitat and a -17.56% net loss (-0.78 units) in hedgerow on-site. A bespoke off-site solution demonstrates that with these enhancements, a +21.19% net gain (+3.86 units) in area habitat and a +10.55% net gain (+0.47 units) in hedgerows will be delivered. However, there are several concerns pertaining to the baseline assessment of the site, which is the reason for the holding objection.

The officer has also raised concerns regarding the feasibility of off-site BNG, concerns relating to the layout and design of the development and subsequent impacts on retained habitats, and discrepancies between documents regarding post-development habitats. Recommendations are made with regards to the West Sussex Local Nature Recovery Strategy priorities. Such matters may be addressed at Reserved Matters.

HDC Landscape: No Objection

[Summary] The Officer provides an assessment of the sites existing character and raises no objection to the proposal. The Officer notes that the residential development would be out of character with the site's context and that the proposed roundabout onto the A29 would result in urbanising impacts on the semi-rural character of the site.

The Landscape Officer has additionally raised the below points:

- Concerns regarding rear gardens adjacent to boundary vegetation which may undermine these landscape features.
- The need to provide multifunctional green corridors as an integral part of the scheme and the potential to front dwellings onto green corridors,
- The need to improve the pedestrian connections within the site which are largely positioned behind garden fencing at this time and to strengthen connection in to the PRow.
- The potential to incorporate a green corridor and landscape buffer to the north west of the site.
- The need to consider the relationship between parking and public open space.
- concerns regarding the long-term management and maintenance of the existing boundary vegetation and the siting of proposed planting / street trees.

HDC Economic Development: Advice

[Summary] Enterprising Horsham (Economic Development) have provided 3 comments during the course of this application dated 08.07.26, 25.08.26 and 10.09.2026.

An initial comment (dated 08.07.26) outlined that it is not considered that the loss of commercial premises in this instance to present a significant risk to the vitality or viability of the District's economy. Further information was requested, however, as to the future of the existing businesses and whether the businesses will relocate elsewhere within the District or cease trading permanently. Following the receipt of further information HDC Enterprise considered this to have been addressed.

A subsequent comment has been received (dated 10.09.2026) providing specific consideration of the submitted viability/marketing report noting that the allocation allows for B2, B8 and a broad range of Class E uses, and that much of the detailed marketing commentary seems to relate to roadside/destination uses such as supermarkets, drive-throughs, petrol/EV charging, automotive and leisure.

Limited evidence has been provided as to how B2, B8 and a broad range of Class E uses have been proactively marketed who was approached or what feedback was received. The Officer notes this warrants further consideration and they would be reluctant, on the evidence currently provided, to conclude that the site is no longer needed or viable for employment use.

Outside Agencies

Archaeology Consultant: Advice

[Summary] The Officer has provided 2 comments during the course of the application dated 7/7/26 and 27/8/2026. Following the receipt of a Historic Environment desk based assessment the officer has noted that the site has a moderate potential for archaeological remains and has requested archaeological investigations and any subsequent mitigation is secured via condition.

Ecology Consultant: Holding Objection

[Summary] The Officer has reviewed the submitted information noting that the preliminary Roost Assessment Report and Daytime Bat Walkover and Ground Level Tree Assessment and the Preliminary Ecological Appraisal Report both omit the northern part of the site. Clarification on this is therefore requested in addition to a walkover survey.

The officer has also noted the potential impact to roosting bats and the high suitability for reptiles. Additional surveys pertaining to these protected species have therefore been requested. It is further noted that the site falls within 3.9km southeast of The Mens Special Area of Conservation (SAC) and 9.0km east of Ebernoe Common SAC and should therefore be submitted to Habitats Regulations Assessment (HRA)

NatureSpace: Further Information Required

[Summary] NatureSpace have provided 2 comments during the course of the application dated 20/07/2026 and 27/08/2026.

Comment 1 - 20/07/2026

The application site is located in an Amber zone with 8 ponds within 500m, the closest of which is located within 20m west of the site. The Officer notes that applicants PEA requests further surveys which have not been provided. The Officer therefore requests either the submission of further surveys or a NatureSpace Report or Certificate issued via the district licencing scheme. It is also noted that surveys should be undertaken in spring.

Comment 2 - 27/08/2026.

The applicant has now confirmed that the pond located 20m to the west of the site has returned a negative eDNA result. However, no further survey information has yet been received, nor detailed justification on any of the other ponds within 250m and 500m regarding why they have been scoped out from assessment. Further information is still recommended.

Southern Water: Advice

Contact Officer: Sam Whitehouse

Tel: 01403 215206

[Summary] Southern Water has undertaken a capacity check which indicates sufficient capacity within the network for foul sewerage / surface water run off disposal to service the proposed development. It is noted that the nearest public sewer is 630.8 metres away from the proposed development and it is the responsibility of the developer to provide the sewerage infrastructure up to the point of practical connection. It is additionally noted that soakaways and SUDs should not be connected into the public sewer and the surface water hierarchy should be followed. In addition, a tree planting condition has been requested so as to protect Southern Water Assets.

WSCC Highways: More information

[Summary] WSCC Highways Authority have provided 2 comments during the course of this application dated 20/07/2026 and 07/09/2026.

Comment 1 - 20/07/2026

Vehicle Access and Visibility

- Clarification is requested whether a T-Junction or roundabout is proposed and it is advised that whichever option is brought forward will require a Design Audit for technical review.
- The Officer notes that visibility splays in accordance with the recorded speeds can be achieved for either access option.
- The Stage 1 RSA raised points which should be further considered by the Design Team and will need to be discussed in more detail with the LHA following confirmation of site access.

Traffic Impact

- The existing use could generate in the region of 202 daily movements with 14/15 movements in the AM and PM peaks.
- The proposal could generate 426 two-way trips daily with 54 two way trips during the morning and 43 vehicles during the evening peak hour.

Layout and Parking

- The Internal layout would be assessed at Reserved Matters.
- A path bordering the northern edge of site to the Black Gate Lane would be beneficial.

Pedestrian Site Accessibility and Travel Plan (TP)

- The on-site retail facility will also provide some local services for residents of the site.
- The nearest bus stops would be 300m north and 170m south of the site respectively and be served by routes 69 and 100.
- The re-location and improvements to existing bus stops were discussed but no further specific detail has been provided, further detail is required including liaison with the bus operator.
- The Design Team should investigate further pedestrian access improvements along State Street.
- Bar the nearby facilities future residents would be reliant on the use of the private car for services and amenities further afield. Ultimately, it is the LPA's decision to consider aspects of sustainability/accessibility as part of their decision-making process.
- Additional Travel Plan methods should be explored and these should be secured via S106.

Comment 2 - 07/09/2026

Following the receipt of a Highways Technical Response Note (ITR.CV.6301.TRN.3) the officer has noted that:

Vehicle Access and Visibility

- The applicant has confirmed the site is proposed to be accessed via a three-arm roundabout.
- The Officer notes that some of the points raised by the Design Team have not been agreed in accordance with the Auditor's Comments and will need to be addressed.
- The Officer further seeks clarification that the RSA undertaken in February 2026 has considered the changes proposed on drawing 6301-005 dated 7th August 2026, if not the original Auditor should pass comment on these points and the RSA updated.

- A Design Audit for the 3-arm roundabout has also not been provided.

Bus Stops

- The Officer notes that agreement of the bus stops and bus services need to be agreed with the bus operator at the planning stage. The Parish should also be engaged regarding bus shelters.

Travel Plan

- The Travel Plan broadly accords with the requirements of the LHA and should be secured alongside relevant fees via a s106 agreement.

WSSC Education: Advice

[Summary] At present, we do not envisage the need for on-site primary or secondary education facilities on this development. We would seek CIL funding towards expansion of existing facilities in the planning area as required.

WSSC Lead Local Flood Authority (LLFA): Objection

[Summary] The Officer has provided 2 comments during the course of the application dated 20/07/2026 and 07/09/2026 raising the following points:

1. There are areas within the current design that do not follow the sequential approach with regards to surface water flood risk, in particular the block of apartments plots 71-93. The Officers latest comment confirms that finished floor levels will need to take into consideration the EA modelled flood depth data for all surface water flood events at reserved matters. In addition, the LPA should consider the sequential test requirements prior to determination of the application.
2. Details are requested confirming the connectivity of the on-site ditches/watercourses to the wider watercourse network (survey and/or topographical data), including details of any culverts present (diameter and invert) and soft/hard bed levels for all watercourses, on and offsite. The latest comment confirms this has not been provided and that the ability to discharge surface water is a key consideration at the outline planning stage and we must be satisfied the site has a robust method of draining without increasing flood risk offsite.
3. The existing watercourses can only be used to convey surface water runoff on site if it can be proven that there are no contributing areas outside of the redline boundary, please can this lack of connectivity upstream be confirmed.
4. Details are requested to ensure accordance with National Standards for SuDS
5. Details are requested of groundwater investigations.

WSSC Minerals and Waste: Objection

[Summary] Officers have requested a Mineral Resource Assessment (MRA). It is also noted this should be provided at the outline stage in order for the LPA to determine whether mineral sterilisation will occur and/or the overriding need for the non-mineral development outweighs the safeguarding of the mineral resource.

Sussex Police: Advice

[Summary] Given that this outline application is only to determine the means of access and to seek approval in principle, there are no detailed comment to make at this stage.

WSSC Fire and Rescue: Advice

[Summary] A comment has been provided advising conditions to secure fire hydrants.

WSSC Public Rights of way: More information

Public Footpaths 1986 / 1986_1 border the proposed site to the N / NW and would serve vital links for the development should permission for the scheme be granted. In such event WSCC as Highway Authority would seek a S.106 contribution to upgrade the surface of both Footpaths to our specification and associated works to ensure a year-round surface to benefit both the residents and local community.

South Downs National Park (SDNP): Advice

[Summary] The site is approximately 520m from, the boundary of the National Park at its closest point and would result in impacts to the setting of the National Park. It is noted that the LPA has a duty to 'seek to further the specified purposes of Protected Landscapes' which are:

- To conserve and enhance the natural beauty, wildlife, and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

Public consultations

7 letters have been received from 7 addresses.

1 letter has been received neither objecting to nor supporting the Planning Application, raising the following matters:

Sewer network / Foul Waster

- Would these dwellings be on main drainage, if so would neighbouring dwellings also be put on main drainage.

1 letter has been received supporting the Planning Application, raising the following matters:

Design

- The design and wildfire fields would enhance the area.

Facilities / Services

- Do not see the need for a shop, given as Sainsburys and Tesco and the petrol station are close.
- Would rather see a community hall, like the one at Thakeham.

5 letters have been received Objecting to the Planning Application, raising the following matters:

Neighbourhood Plan

- The site has not been put forward in the Neighbourhood Plan for residential development.
- The site conflicts with the emerging neighbourhood plan

Sewer network / Foul Waste

- Not connected to main sewer or drainage.
- Sewerage/drainage systems need upgraded and are discharging untreated waste.
- Site cannot be built on septic tanks.

Housing need / Rental Housing

- The parish needs affordable rental housing.
- Housing would not be genuinely affordable.
- Housing need does not outweigh adverse impacts.

Traffic / Highways

- The site access would cause congestion where the road is already busy and there has been traffic collisions.
- Traffic and high speeds along the A29.
- How would traffic movements on the A29 be considered with Adversane.
- Travel from the site will require a car.

- Poor pedestrian connectivity.
- The proposed roundabout would slow traffic and has not been justified.

Wildlife / Ecology

- Impact to wildlife and woodland habitat
- Loss of trees
- Insufficient ecological evidence is provided.

Infrastructure

- Where will residents go to school, Weald school is at capacity.
- GPs are at capacity.
- Limited public transport
- The site is unsustainable in relation to services within a realistic walking distance.

Landscape

- Harm to the South Downs National Park.
- Housings impact on landscape and character.
- Housing would be suburban and out of keeping with detached properties.

Parish Comments

Pulborough Parish Council: Objection

The proposed development would create a substantial, predominantly greenfield residential enclave outside the defined built-up area boundary, contrary to the spatial strategy and Policies 1, 8 and 15 of the made Pulborough Neighbourhood Plan and Policies 2, 3, 4, 25 and 26 of the Horsham District Planning Framework.

The development would significantly alter the established settlement pattern, urbanise countryside possessing a strong rural character and result in a car-dependent form of development insufficiently integrated with Pulborough and Codmore Hill. These concerns are supported by Horsham District Council's June 2026 assessment of site SA677, undertaken in the context of the acknowledged housing shortfall, which rejected the site for housing because of very negative landscape impacts, settlement-pattern harm and inadequate sustainable accessibility.

The benefits of market and affordable housing are acknowledged. However, when considered alongside the strong and recently made Neighbourhood Plan, the Council considers that the identified adverse impacts significantly and demonstrably outweigh those benefits.

Member Comments

No Member comments received.

HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS

The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

It is not considered that the development would be likely to have any significant impact on crime and disorder.

PLANNING ASSESSMENTS

Principle of Development- Policy Background

As it stands, the development plan relevant to the proposed development comprises the Horsham District Planning Framework (HDPF, 2015), the 'made' Pulborough Neighbourhood Plan (PNP, 2015-2031) and the West Sussex Joint Minerals Local Plan (2018). In accordance with planning law, these documents form the statutory development plan and the starting point for the assessment of the development proposals. The National Planning Policy Framework (2026) and accompanying Planning Practice Guidance are material considerations relevant to the development proposals.

Development Plan Policy

The Horsham District Local Plan (HDLP, 2023-40)

The Horsham District Local Plan 2023-40 (the emerging Local Plan or 'eLP') is currently at examination stage with examination hearings scheduled for Autumn 2026. The Horsham District Local Plan 2023 - 2040 remains the emerging Local Plan (eLP) in the context of NPPF Policy DM4 and therefore constitutes a material consideration. Nonetheless, given the plan remains at examination stage at this time, the policies and background evidence base within the eLP are considered to carry limited weight. Notwithstanding this, it is noted that the site does not form a draft housing allocation within the emerging HDLP.

Horsham District Planning Framework (HDPF, 2015)

HDPF Policies 1 (Sustainable Development), 2 (Strategic Development), 3 (Development Hierarchy), and 4 (Settlement Expansion) set out the settlement hierarchy of the district and establish the Council's main strategy for the location of development across the district. HDPF Policy 3 specifically outlines the settlement hierarchy of the district and establishes that development will be permitted within defined built-up area boundaries (BUABs).

HDPF Policy 4 (Settlement Expansion) supports the growth of settlements outside built-up area boundaries to meet identified local housing where;

- 1.) A site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;
- 2.) Where the level of expansion is appropriate to the scale and function of the settlement;
- 3.) Where the development would satisfy identified local housing (or employment) need or would assist with the retention and enhancement of community facilities/services;
- 4.) Where development would not prejudice long-term strategic development and;
- 5.) Where development is contained within an existing defensible boundary and would maintain features of landscape and townscape character.

HDPF Policy 26 (Countryside Protection) also provides support for development outside of BUABs where there is an essential need for a countryside location, and where further qualifying criteria are met.

Pulborough Neighbourhood Plan (PNP, 2015-2031)

The Pulborough Neighbourhood Plan was formally made on 9 October 2025. The Plan is under five years old and contains policies and allocations to meet its identified housing need in accordance with NPPF Policy S6. PNP Policy 1 (A Spatial Plan for the Parish) seeks to direct development to the Pulborough BUAB and outlines that proposals outside of the BUAB should conform to development plan policies in respect of the control of development in the countryside, namely HDPF Policy 4 and Policy 26 set out above.

PNP Policy 8 additionally allocates the north eastern portion of the site for a range of commercial and tourism uses including B2 (General industrial), B8 (Storage or distribution), C1 (Hotels), E (Commercial, Business and Service), F1 (Learning and non-residential institutions); F2 (Local Community), motor sales showrooms and leisure parkland. The allocated area covers approximately 3ha and comprises the existing café, car wash, Stane Cottage, associated areas of hardstanding, and the adjacent agricultural field. In addition, Policy 8 sets out nine development criteria, including requirements that proposals are appropriate to the local context, provide safe access, and retain existing field boundaries.

National Planning Policy Framework (2026)

The National Planning Policy Framework (NPPF 2026) was published on 17 August 2026 and is a material consideration in decision-making from the date of publication. Annex A of the NPPF sets out that development plan policies (or parts of policies) which are materially inconsistent with national decision-making policies in the Framework should be given very limited weight.

NPPF Policy S3 establishes a permanent presumption in favour of sustainable development and states that development outside settlement boundaries should be assessed in accordance with Policy S5. NPPF Policy S5 identifies specific forms of development outside settlements that should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. The forms of development which are relevant in this instance include:

(b) Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary;

(d) The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);

(h) Residential and mixed-use development which would:

- i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);*
- ii. Be physically well-related to the station or the settlement within which the station is located;*
- iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and*
- iv. Not prejudice any proposals for long-term comprehensive development in the same location.*

(i) The development of land allocated for that purpose in the development plan (where this lies outside settlements); and

(j) Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test, and where the development would:

- i. Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or*
- ii. Comprise major development for freight and logistics purposes which accords with policy E3.*

NPPF Policy S5(4) further outlines that development which falls outside of a settlement boundary and does not fall within one of the categories set out in Policy S5 should only be approved in exceptional circumstances where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.

NPPF Policy S6 addresses how the presumption in favour of sustainable development should be considered where a proposal would conflict with a neighbourhood plan, noting that the benefits of approving development are likely to be substantially outweighed by the adverse effects where:

- a. The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- b. The neighbourhood plan contains allocations to meet its identified housing requirement (see policy HO2).

Principle of Development- Assessment

In this instance, the proposal seeks both commercial and residential development within the site. The below assessment considers the in-principle acceptability of each aspect in turn, in addition to specific consideration of the site's allocation and the implications of any previously developed land (PDL). A final summary of the principle acceptability of the development as a whole is made under the heading 'Conclusions and Planning Balance' at the end of this report.

Commercial Development

The commercial aspect of the proposal comprises a pharmacy / health store (Use class E(e) / E(a)), on site shop (Use Class E(a)) and café (Use Class E(b)). Given the outline stage of the application, specific details of these elements including the siting, scale and internal layout are not subject to this application, however, these uses are indicatively shown to be sited to the north east of the site.

As set out above PNP Policy 8 allocates approximately 3ha of the site for a range of commercial, employment and community uses. The commercial aspects of the proposal all fall within the allocated uses and would therefore each gain in-principle support from PNP Policy 8. This support is also reflected NPPF 2026 Policy S5(1) part (i) which provides support for the development of land outside of settlement boundaries which is allocated for that purpose in the development plan. It is further noted that Tote Café has been on the site since approximately 1975 establishing the principle of a café in this part of the site.

As such, the principle of the commercial aspects within the site is considered acceptable under PNP Policy 8 and NPPF 2026 Policy S5(1) part (i) where these aspects would be contained exclusively within the PNP Policy 8 allocated area. It is noted that any commercial development outside of the allocated area would not attract this in-principle support.

Residential Development - Principal accordance with the development plan

The residential aspect of the development comprises up 93 dwellings. The application site is located outside any of the district's defined Built Up Area Boundaries (BUABs). At the closet point the site is 250m to the north the Codmore Hill BUAB, as extended by the Pulborough Neighbourhood Plan, and 1.7km north of the Pulborough BUAB. Officers note, however, that when measured from the proposed access the site would be approximately 450m north of the Codmore Hill BUAB, and 1.9km north of the Pulborough BUAB.

The proposed siting of residential development is not considered to have an essential need for a countryside location, and the application site has not been allocated for residential development within either the HDPF, PNP or emerging HDLP. The proposal would therefore be at odds with the adopted spatial plan and would fail to accord with HDPF Policies 2, 4 and 26 and PNP Policy 1.

Residential Development - Principal accordance with the NPPF Policy S5

As set out above, NPPF Policy S5 identifies specific forms of development outside settlements that should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. An assessment of the relevant NPPF Policy S5(1) criteria is provided below:

Part 'h' - Well-connected stations

NPPF Policy S5(1) part 'h' provides in-principle support to residential development outside of settlement boundaries where development would "*be within reasonable walking distance of a well-connected station*" and "*physically well-related to the station or the settlement within which the station is located.*"

In this instance, the closest 'well connected station' is Pulborough station which is a 3.2km / 45 minutes' walk from the site. This is significantly beyond the 800 metres / 10 minutes' reasonable walking distance as defined by the NPPF 2026 Appendix B. The site would also not be "physically well-related" to the settlements of Pulborough or Codmore Hill. As set out above, the site access would be 450m north of the Codmore Hill BUAB, as defined by the PNP. The site is also physically separated from the settlement by agricultural land / open fields with limited pedestrian links other than walking along the A29. The proposal would therefore not benefit from support under NPPF Policy S5(1) part h.

Part 'j' - Evidenced unmet housing need

NPPF Policy S5(1) part 'j' provides in-principle support to residential development outside of settlement boundaries where this would address an evidenced unmet need. The Council's latest Authority Monitoring Report (AMR) (December 2025) demonstrates the Council currently has a housing land supply of 1.7 years against current targets. In addition, Horsham's 2025 HDT measurement (published on 17 August 2026) was 44%. It is therefore acknowledged that the Council is unable to demonstrate a full 5-year housing land supply and that the Council's most recent HDT is below 75%.

Notwithstanding this part 'j' requires the development to '*be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate).*' As set out above, the site is not considered to be "physically well-related" to the closest settlement. The proposal would therefore not benefit for NPPF Policy S5(1) part j.

Part 'd' – Previously Developed Land

NPPF Policy S5(1) part 'd' provides in-principle support for the redevelopment of previously developed land outside of settlement boundaries, including where this would be a material change of use to residential or mixed-use including residential.

The application site has a total area of approximately 6.3 ha, of which officers calculate approximately 1ha meets the definition of Previously Developed Land (PDL). This includes the existing hard standing, Toat Café and the car wash which collectively amount to approximately 0.7ha. This also includes the existing dwelling 'Staness Cottage,' residential garden and the mobile homes which amount to approximately 0.3ha. It is noted that the existing stable block / barns (~0.14ha) are referenced within the planning statement as disused agricultural buildings and would therefore not be considered PDL.

The remainder of the site (approximately 5.3ha) remains undeveloped and/or agricultural land that does not meet the definition of PDL. This results in a total PDL coverage of approximately 20% across the site with a significant proportion of the proposed development within areas of undeveloped and/or agricultural land. Therefore, when taken as a whole, it is not considered that the proposal would benefit from support under NPPF Policy S5(1) part 'd.'

Part 'i' – Allocated Development

NPPF Policy S5(1) part 'i' provides in-principle support for the development of land outside of settlement boundaries where it is allocated for that purpose in the development plan. As outlined above, PNP Policy 8 allocates approximately 3ha of the site of the site for a range of commercial, employment and community uses.

The draft allocation does not, however, include any provision for residential development. It is further noted that the PNP 'Strategic Environmental Assessment: Environmental Report' expressly considered the potential to include a degree of 'enabling housing development' within the PNP Policy 8 allocation. This assessment identified 'significant negative effects' due to the site distance from the BUAB and the resultant lack of accessibility for future residential uses. The report distinguishes this from the allocated commercial and tourism uses and recommends that enabling residential development is not included within the allocation.

It is noted that the spatial requirements for residential and commercial development vary significantly, with dwellings expected to be sustainably sited with access to the range of facilities and services needed day to day, such as access to health care, employment, education. This is evidenced in proposal's conflict with both Development Plan Policy and National Policy pertaining to residential development outside of settlement boundaries.

It is further noted that the allocation only covers a proportion of the site, with the proposal seeking residential development on land which falls outside of any allocation including PNP Policy 8. The residential aspects of the development are therefore not considered to benefit from support under NPPF Policy S5(1) part 'i.'

Loss of Employment Use / Commercial Viability

The submitted planning statement indicates that the site currently employs approximately 4 full-time equivalent members of staff associated with the café and car wash and notes that due to the proposed café, shop, and pharmacy there would be no loss of employment within the site.

The proposal has been reviewed by the HDC Enterprise team who have indicated that the loss of the existing commercial premises in this instance is not considered to present a significant risk to the vitality or viability of the District, however, the Officer additionally requested clarity as to whether the existing café and car wash would relocate elsewhere within the district or cease trading. The applicant has confirmed the replacement café and shop would be run by the existing café operators and that the pharmacy would be operated by Beneficial Health, subject to negotiations. No comment is provided regarding the carwash. HDC Enterprise consider this to have addressed their concerns regarding the loss of existing on-site employment.

Beyond the loss of the existing employment use, the proposal would also result in the loss of employment land allocated within PNP Policy 8. As outlined above, PNP Policy 8 allocates approximately 3ha of the site for a range of commercial, employment and community uses. Whilst this report has already set out the residential aspects of the proposal would not benefit from support under this allocation, the submitted Planning Statement and the Planning Viability Report sets out that the site has been marketed since December 2023, stating:

“there is no realistic prospect of the site being brought forward for viable commercial development” and that “the proposed conversion of the site to residential use represents the only feasible and sustainable alternative for the future use of the site.”

The report sets out that initial marketed began in December 2023 via a targeted marketing campaign whereby 59 commercial developers were approached directly in addition to potential end occupiers including “*Restaurant and Coffee Drive-Thru’s, Automotive Dealerships, Food Supermarkets, Petrol Stations, EV Charging Operators, Hotels, Public Houses and Breweries, Retirement and Care Homes, Garden Centres, Self-Storage operators, Sports & Leisure Uses and other Retail and Trade Counter operators*”. No price was advertised at this time, and the report notes no in-person viewings have been conducted, however, it indicates interested parties may have worked ‘off plan’ or visited the site unaccompanied.

The Planning Viability Report outlines that the potential purchasers / tenants commented on the lack of sufficient local residential catchment, nearby retail competition from Sainsbury’s and Tesco, and insufficient roadside traffic (10,500 vehicles per day). Notwithstanding this, a number of parties expressed interest in the site including:

- A supermarket
- A ‘roadside operator’ seeking to develop a Petrol Filling Station, EV Charging Points and a Coffee Drive Thru.
- A second EV charging company
- A Drive-Thru and a leisure operator seeking to build padel courts

It is outlined that an offer was received from the roadside operator subject to 'a national supermarket' being present on site. A second offer was made by the EV Charging company subject to contract, planning, confirmation of the level of power and the tenant line-up being suitable.

The Viability Report goes on to state that the supermarket operator did not proceed with the site, and the site was subsequently placed on the open market in early May 2024 to secure a replacement supermarket / tenant. During this time, the site has received further interest from a number of businesses including a supermarket operator and a drive-through restaurant, however, these operators also did not consider the site to have sufficient roadside traffic.

The Viability Report concludes that whilst the site did gain some commercial interest each party required the presence of a major anchor occupier. As such, it is argued that the marketing did '*not generated credible or deliverable interest from end occupiers*' with '*no realistic prospect of the site being brought forward for viable commercial development.*'

The submitted Viability Report has been reviewed by the HDC Enterprise team who note that the marketing activities focus significantly on roadside developments and that much of the detailed marketing commentary relates to roadside/destination uses such as supermarkets, drive-throughs, petrol/EV charging, automotive, and leisure. Given the application site's location in the open countryside outside of a settlement, it is acknowledged that these uses may not be well suited to the site at this time.

Nonetheless, PNP Policy 8 is highly permissive and includes a significant range of uses including those which would not be impacted by the lack of a residential catchment or roadside traffic. These include Class E (Commercial, Business and Service), B2 (General industrial) and B8 (Storage or distribution) uses which would not be impacted by population catchment, traffic flows and the absence of an anchor occupier. Rather, such uses tend to prefer to be located on the strategic road network to allow for the easy transfer of goods.

Whilst the Viability Report states that the site was marketed openly, limited evidence is provided as to how proactively these sectors were tested, who was approached or what feedback was received. Officers further note that given the scale of the allocation, the site's location along the busy A29 and the limited adjacent residential development, the site has suitable characteristics for industrial, warehouse or logistics uses including Class E, B2 or B8 uses which require extended hours of operations. Officers are therefore not satisfied that the site is no longer needed or viable for an employment use without evidence specifically addressing Class E employment, B2 and B8 uses including the occupiers/developers approached and the feedback received.

Notwithstanding the above, Officers note that in the event the allocation was considered unviable, and where officers consider there to be no reasonable prospect of an application coming forward for any of the allocated uses, this would not automatically support the site's alternative use for residential development.

Viability of onsite commercial uses

Officers have some outstanding concerns regarding the long-term viability of the on-site pharmacy, shop and café, particularly given these services are intended to improve the onsite provision for future residents and therefore the proposal's sustainability credentials. It is noted that the Planning Viability Report sets out that commercial development including retail / roadside uses are not considered to be viable on the site, citing the limited local catchment, insufficient traffic flows, and the need for a major anchor occupier to underpin a roadside scheme.

Given these concerns, Officers have requested the submission of further information to demonstrate the viability of the proposed businesses. Whilst this has not been provided the applicant has provided a letter stating the proposed café and shop would be operated by the applicants (who currently operate the existing Café), and that the pharmacy would be operated by a third party 'Beneficial Health.' It is further stated that the café, shop and pharmacy would serve the new development of 93 dwellings and that they are considered to be viable businesses.

Whilst Officers consider the siting of 93 dwellings would generate a degree of custom for onsite businesses, it is not considered that 93 could support the long-term viability of these business, particularly if they are located away from the main site frontage as indicated on the submitted plans. It is therefore considered that some uncertainty remains between the stance taken in the Viability Report and the proposal's inclusion of commercial elements. This weakens the applicant's argument that the provision of these onsite facilities will support the sustainability of housing development on the wider site.

Principal Summary

In summary, the proposed development, when considered as a whole, conflicts with the requirements of HDPF Policies 2, 3, 4 and 26 and PNP Policy 1 as the site falls within a countryside location, is not allocated for the proposed development and is not considered to have an essential need for a countryside location. Whilst this assessment considers commercial development within the allocation to be acceptable in principle, the proposal should be considered as a whole and therefore fails to attract the support of PNP Policy 8. The principle of development is therefore not supported by the adopted development plan.

It is additionally noted that insufficient evidence has been provided at this time to clearly demonstrate commercial allocation PNP Policy 8 is no longer needed or viable for employment use with particular focus specifically within Class E, B2 or B8 which have a reduced reliance on residential catchment or roadside traffic.

In addition, the proposal fails to attract the support of NPPF Policies S3, S4 and S5 and therefore per Policy S5(4) should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement. The following sections of this report therefore consider all other detailed planning considerations, with the final section considering the overall Planning Balance.

Site Connectivity and Sustainability

HDPF Policy 40 supports developments that promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services, and facilities. Development should be appropriate and in scale to the existing transport infrastructure and should be located in areas where travel distances are minimised and where there would be a choice of transport modes.

NPPF Policies TR3 and TR4 outline that development should be located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure and offer a genuine choice of transport modes for residents and users. NPPF Policy TR3(1) part (a) outlines that proposals which could generate a significant amount of movement should be in sustainably sited to limit the need to travel, particularly by private car, and offer to a genuine choice of transport modes. NPPF Policy TR3(1) part (e) outlines that opportunities to improve walking, wheeling, cycling and public transport should be taken in rural areas.

NPPF Policy CC2 further outlines that proposal should accord with policies TR3 and TR4 so that sustainable patterns of movement are prioritised, and opportunities are taken to improve walking, wheeling, cycling, and public transport.

As set out above, the site access would be 450m north of the Codmore Hill BUAB, as defined by the PNP and would be 1.9km north of the edge of the Pulborough BUAB. These settlements are collectively classified as Tier 2 settlements (Small Towns and Larger Villages) which are considered to have 'a good range of services and facilities, strong community networks, and local employment provision, together with reasonable rail and / or bus services'.

In assessing the sustainability of this location Officers have utilised the gov.uk 'Connectivity Tool' which indicates an overall connectivity score of between 28 and 33 across the site. This connectivity score falls within the 60th - 70th percentile when compared with other sites located within the 'Rural hamlets and isolated dwellings' classification. This is the lowest / most rural classification within the matrix. Officers note this tool seeks only to compare connectivity with other sites within the same classification and does not seek to take account of the scale of the proposed development, or sustainability needs of that development.

NPPF policy TR3(2) details the above Connectivity Tool should be used alongside other relevant quantitative or qualitative evidence. Officers have therefore reviewed the closest facilities and services to the site, the walking distance to these services and the quality of connectivity as a pedestrian, cyclist and via public transport.

Education

- St Mary's C.E Primary School (~2.6km / ~35 mins walk)
- The Weald Community School and Sixth Form (Billingshurst) (~5.5km / 1hr 15min walk)

Retail

- North Heath Service Station (200 metres / 3-4 mins walk)
- Sainsburys Codmore Hill (1.45km / 21 mins walk)
- Tesco (2.4km / 33 mins walk)
- Pulborough High Street (3km / 42 min walk)

Community and recreational

- Medical Practice / Pharmacy (2.4km / 33 mins walk)
- Recreation Ground (2.5km / 34 mins walk)
- Pubs / Restraints within Pulborough BUAB (from ~ 2.9km / 40min walk)
- Library and Village Hall (3.2km / 44 mins walk)

Commercial / Employment

- Broomers Hill Lane Units (500m / 8 mins walk)
- Stane Farm Industrial Units (640m / 9 mins walk)

It is noted that all distances are based on a walking distance from the site access. Residents within dwellings at the furthest extent of the site (such as indicative plot 1) could therefore be expected to walk a further 250m / 4 minutes to each location set out above.

Walking / Pedestrians

The closest existing facilities and services to the site would be within the North Heath Service Station located approximately 200m to the north of the site access. This would provide some limited / convenience goods commensurate with a petrol station. The proposal additionally seeks an onsite pharmacy / health supplements shop and shop / café. WSCC Highways Authority note that this provision would provide some reduction in the number of trips that would be made to off-site retail units.

Officers note that the onsite shop / café could be expected to offer a level of service comparable to North Heath Service Station providing some convenience goods. Further to this, 'Beneficial Health' are an existing business who sell health supplements and health product as opposed to a standard pharmacy providing prescription medicines. Beneficial Health currently operate from Stane Street Nurseries, located adjacent the Codmore Sainsburys within the Codmore Hill BUAB. It remains unclear that the provision of a health supplements store would directly address the needs of future residents on a day-to-day basis sufficient to reduce trip generation.

Beyond these immediate services, residents would be reliant on services and facilities within the Codmore Hill and Pulborough BUABs to meet their daily needs. These services, with the exception of the commercial / industrial units, would all be significantly beyond the 800m / 10 minutes

reasonable walking distance defined within the NPPF and advocated for in the Active Travel England Standing advice (June 2024) and Planning for Walking Guidance (April 2015).

Nonetheless, it is noted that 800m / 10 minutes is not a definitive upper limit and that walking distances may vary by user and by destination. Planning for Walking also sets out that “people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating.” It is therefore necessary to consider the quality of pedestrian links.

The primary pedestrian link to Codmore Hill and Pulborough is via the footway alongside the A29 / Stane Street. The A29 is straight and gently undulating A road which is enclosed by vegetation / field boundaries on both sides, with sporadic commercial development / isolated dwellings along its length. The road has a posted national speed limit (60mph) which continues approximately 800m south of the site access to the Codmore Hill boundary. The submitted transport assessment further indicates 85th percentile speeds of 51.8mph northbound and 49.1mph southbound at the site access with existing AM peak traffic flows of 502 movements southbound and 574 movements northbound and PM peaks of 620 movements southbound and 390 movements northbound.

The footway extends alongside the A29 for the entire distance between the site and the centre of the settlement (approximately 2.9km). The footway varies in width, including large sections with an approximate width of 1m or less. There is also no verge or separation between the footway and the carriageway requiring pedestrians to walk directly adjacent to the carriageway. The width of this footpath is such that users would be unable to pass without stepping into the road and the footpath would be unsuitable for wheelchairs, pushchairs, users traveling with children etc.

Officers also note that a substantial proportion of the route lies outside any defined BUAB, with approximately 800 metres of the footway to the south of the site being unlit. Furthermore, the route follows a long, straight section of road that is closely enclosed by vegetation, resulting in limited visual interest, stimulation, or opportunities for respite for pedestrians.

Given the above, whilst officers note that 800m is not a prescribed maximum walking distance, in this instance residents would be required to walk significantly beyond 800m to reach the majority of services and facilities, and given the quality of the pedestrian footway, the speeds / volumes of traffic, and the lack of rest bite or visual interest, Officers have significant concerns regarding the suitability of this route to serve the future development or to encourage walking as a genuine choice of transport. This would be heightened for vulnerable road user including elderly residents, wheelchairs, parents with children / pushchairs etc where the route would be largely unsuitable.

It is noted that the transport statement indicates potential improvements to pedestrian connectivity stating that the footway on the east side of the A29 may need to be widened to accommodate all users, including pedestrians with push/wheelchairs, and that financial contributions can be made towards “improving street lighting along the footway on the A29” and “providing dropped kerbs and tactile paving at junctions include that of Broomers Hill Lane and Cray Lane”.

Officers note that specific details of these measures have not been provided at this time and that the deliverability or extent of footway widening has not been demonstrated or explored. Furthermore, given the A29 is substantially constrained by vegetation and field boundaries for much of its length this may prove challenging / impractical to deliver in practice. Notwithstanding this, whilst the delivery of footway widening / street lighting would go some way to improving pedestrian experiences, this would not overcome the need for pedestrians to walk directly adjacent to a national speed limit road without a buffer or verge in place, that the route would remain largely unstimulating and without rest bite, or the required walking distances.

Beyond the A29, alternative pedestrian routes are available via the PRoW network. Officers have indicatively calculated the PRoW route to Codmore Hill Sainsbury's whilst avoiding the A29. This would require a ~2.6km walk (35-40 minutes) via a network of unsurfaced public footpaths including through agricultural land / fields which are unlit and unpaved (Footpaths 1986/1, 1986, 1987, 1983,

1989). As acknowledged within the submitted Transport Assessment this walk would be impractical other than for leisure.

Cycling

Cycle access from the site would be achieved via the vehicle access with a number of the above amenities falling within a 7-minute cycling distance and the centre of Pulborough being a 13-minute cycle. The primary cycle connection into the settlement would be via the A29 which is single carriageway road with a posted national speed limit, undulating topography, high traffic volumes, and no established cycle infrastructure. Officers therefore consider that this would be a challenging road on which to cycle even for the most experienced and confident cyclists and therefore would be largely inaccessible to most. The provision of cycle parking for each dwelling could be secured via condition.

Public Transport

In addition to pedestrian and cycle connectivity Officers have considered the provision of public transport connections. As existing the closest connections are as follows:

- Bus stops northbound (350 metres / 4 – 5 mins walk)
- Bus stops southbound (300 metres / 4 – 5 mins walk)
- Pulborough Train Station (3.2km / 45 mins walk)

As set out above, all measurements are based on a walking distance from the site's access. Residents within dwellings at the furthest extent of the site (such as plot 1) could therefore be expected to walk a further 250m / 4 minutes to each location set out above.

Bus Stops

The closest bus stops are located 350 metres to the north of the site access (Blake Cottages) and 300 metres to the south of the site access (Blackgate Lane). Both stops serve routes 69 and 100. Route 69 provides connections between Worthing and Alford once daily between Tuesdays and Fridays. Route 100 provides approximately hourly connections between Horsham and Burgess Hill Monday – Saturday between the hours of ~7:00 and ~19:00 with no service is provided on Sundays. As existing these stops are unmarked, except for Blake Cottages traveling south bound which has a flag pole sign.

The submitted transport statement outlines that both north and southbound bus stops could be relocated adjacent to the site access so as to be within a reasonable walking distance for future residents (400m). It is proposed for bus stops to be 'hardwood 'rural-type' shelters with Real Time Passenger Information. WSCC Highways Authority have reviewed this proposal outlining that the relocation of bus stops would require the applicant to seek the agreement from the bus operator, who would be responsible for delivering the serve, and from the Parish Council, who would be responsible for future maintenance of the bus stops.

Whilst WSCC Highways Authority have outlined this should be agreed prior to determination, no evidence of any engagement or agreement has been provided at this time. It is further noted that WSCC Highways Authority have outstanding concerns regarding the Stage 1 RSA and design audit for the proposed access, which includes the siting of the proposed bus stops. Given this, it has not been demonstrated that the relocation of bus stops is deliverable at this time.

The applicant's planning statement additionally sets out that financial contributions could be made towards improving the bus service. No details as the extent of this financial contribution have been provided and it remains unclear what improvements this would deliver. Nonetheless, Officers note that any service improvements funded via the application would likely be temporary in nature and that the continuation of enhanced services would be largely reliant on commercial viability and attracting a sufficient number of bus users to mainline service provision. It is therefore not considered that a financial contribution would materially alter the sustainability of the site.

Given the above, the closest bus stops to the application site would likely remain those on Blake Cottages and Blackgate Lane. These would be within a 400m reasonable walking distance of the site access, however, would require residents to walk along the A29 for approximately 300m. As set out above, Officers have significant concerns regarding the suitability of this pedestrian footway. It is also noted that for dwellings towards the west / southwest of the application site, this walk would be closer to 500-600m. Nonetheless, these stops would be served by route 100 which is considered to provide a reasonable level of service to future residents and would provide connections into Horsham and Burgess Hill. It is therefore considered that bus provision would go some way to reducing reliance on private vehicles.

Train Stations

The closest train station is Pulborough station (which is considered to be a 'well-connected station') providing connections between Portsmouth and London, including stops at Horsham. The station is a 45 minute walk (3.2 Km) via the A29, a 13-minute cycle distance or alternatively a 15 minute journey via 100 bus route which, as set out above, runs an hourly service Monday – Saturday between the hours of ~7:00 and ~19:00 with no service is provided on Sundays. Given these distances and the route conditions regular access to the train station is likely to be by private car rather than sustainable modes.

Travel Plan

Beyond the mitigation measures set out above, such as bus stop improvements and street lighting, the application also includes a Framework Travel plan has been provided including the following measures:

- Consideration of EV Charging points;
- Lift Share Club;
- Travel Plan Notice Board/Website;
- Car Club Scheme to include an onsite car club parking bay located near the retail facilities. Residents would be provided with 3 year's membership of Enterprise Car Club and £50 drive time credit. Officers note that rental costs are approximately £8 per hour and 25p per mile for car club members.
- Travel Welcome Pack for Residents
- Bus taster tickets valid for 1 month

The above measures have been reviewed by WSCC Highways who notes that the travel plan now broadly accords with the requirements of the LHA. In the event permission is granted the above measures should be secured within the Travel Plan via S106 agreement alongside a monitoring fee of £4,110.

Summary

In summary, the application site is located in a countryside location where residents would have only limited access to some small scale convenience retail goods in the immediate vicinity, with the wider daily needs of residents requiring travel further afield, including into the settlements of Codmore Hill and Pulborough.

The pedestrian links alongside the A29 into Codmore Hill and Pulborough are considered to be unsuitable to provide a genuine choice for future residents and would be largely inaccessible to vulnerable road users including elderly residents, wheelchairs, parents with children / pushchairs.

Beyond walking, the site would be within a cycle distance of the nearest settlement, however, the busy and undulating nature of the A29 would make cycling largely inaccessible for most. The 100-bus route also runs along this stretch of the A29 with bus stops within a 300 – 600m walk of dwellings, depending on their location within the site. As set out above, this bus service provides a reasonable level of service during daytime hours (~7:00 and ~19:00 six days a week), however, residents would still be required to walk along the A29 footway, and outside serviced hours / routes, the majority of residents would be entirely dependent on private vehicles.

Given the above and noting the sites significantly constrained pedestrian links from the site, it is not considered that the application site is suitably located to promote sustainable patterns of movement, to limit the need to travel or that the proposal provides a genuine choice of transport modes for residents and users. The proposal therefore fails to accord with NPPF Policies TR3, TR4 and CC2 and HDPF Policies 2, 3, 4 and 40.

Housing Mix and Affordable Housing:

HDPF Policy 16 states that development should provide a mix of housing sizes, types, and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment (Iceni, November 2019). HDPF Policy 16 additionally requires proposals for 15 or more dwellings to deliver 35% of dwellings to be affordable with a tenure split of 70% affordable rented and 30% intermediate tenure.

The application includes a commitment to 35% affordable housing (33 units) in accordance with HDPF Policy 16. The applicant has also provided an indicative housing mix which is compared with the recommended mix set out in the Council's current Strategic Housing Market Assessment (SHMA, 2019) as follows:

Affordable Rented	SHMA 2019	Proposal (units)	Over / under supply
1-bed	8.0	6.0	-2.0
2-bed	6.8	6.0	-0.8
3-bed	5.7	8.0	2.3
4+ bed	2.3	3.0	0.7
Total	22.8	23.0	0.2

Shared Ownership	SHMA 2019	Proposal (units)	Over / under supply
1-bed	2.4	3.0	0.6
2-bed	3.9	4.0	0.1
3-bed	2.4	2.0	-0.4
4+ bed	1.0	1.0	0.0
Total	9.8	10.0	0.2

Open Market	SHMA 2019	Proposal (units)	Over / under supply
1-bed	3	3	0
2-bed	18	19	1
3-bed	24	24	0
4+ bed	15	14	-1
Total	60	60	0

As set out above, the indicative housing mix is broadly comparable to the 2019 SHMA. Whilst the proposal includes a slight undersupply of 1 and 2 bed affordable rental units, this is compensated by a slight oversupply in 3 and 4 beds. This is considered acceptable.

The proposal has additionally been reviewed by HDC's Housing officer who has requested the applicant engage with a Registered Provider (RP). Given the application is currently at outline stage, should the application be approved, the applicant is encouraged to engage with an RP prior to the submission of reserved matters and to ensure the final layout accords with the requirements / needs of a RP to take on the affordable homes within development.

The delivery of the mix of affordable housing, including their respective split between affordable rented (70%) and shared ownership (30%), would be secured by way of a s106 agreement and a final housing and tenure mix would be secured within an application for reserved matters to ensure appropriate compliance with HDPF Policy 16.

Design, Appearance and Landscape Impact:

HDPF Policies 25, 32, and 33 promote development that protect, conserve and enhance the townscape character from inappropriate development. Proposals should take into account townscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.

HDPF Policy 31 states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.

PNP Policy 15 further requires housing to be well-designed with a scale, density, massing, height, landscape design, layout, and materials appropriate to the historic character and scale of the surrounding buildings and landscape. PNP Policy 15 further requires regard to the Pulborough Design statement.

NPPF policy DP3 seeks to ensure well-designed places that respond to their context and integrate with and enhance their surroundings and sets out principles of design pertaining to Liveability, Climate, Nature, Movement, Built Form, Public Space. DP3 further clarifies that proposals should be refused where they conflict with DP3 1 or 2.

NPPF Policy N4 outlines that development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape.

The site falls within Landscape Character Area (LCA) J1 Billingshurst and Heath Farmlands character area of the Horsham Landscape Character Assessment which is characterised by small to medium size fields enclosed by frequent hedgerows, copses and small to medium sized woodland blocks, many mature field trees following hedgerows and lanes, semi enclosed landscape.

The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) which has been reviewed by the Councils Landscape Officer. It is noted that the Officer has not objected to the proposal, however, has raised a number of substantial concerns that the residential development would be out of character with the site's context and that the proposed roundabout onto the A29 would result in urbanising impacts on the semi-rural character of the site.

Officers note that the application site is located north of the established BUAB within the open countryside with the closest substantial residential development being in Codmore Hill approximately 600m to the south. The proposal seeks to introduce up to 93 residential dwellings and some limited commercial uses. Whilst design and layout remain reserved at this time, these are indicatively shown to be highly suburban in character.

As existing the portion of the site visible from the A29 has a semi-urban character which is influenced by the siting of the A29, the café, car wash and hard standing. It is emphasised that the semi-urbanising influence impacts only part of the site and that the remainder of the site remains undeveloped and notably rural in character and is reflective of characteristics found in the J1 LCA including, frequent hedgerows, mature field trees following hedgerows and semi enclosed landscapes. It is, however, noted that the indicative layout seeks to largely retain hedgerows and treelines on site.

Beyond the site's immediate setting, and away from A29, the area has a strongly rural undeveloped character. Whilst it is acknowledged that there is some sporadic development along the A29 including Broomers Hill Lane Units / Stane Farm Industrial Units location 500-600m to the south and Brinsbury Campus / Architectural Plants located approximately 1.5km to the north. Broomers Hill Lane Units / Stane Farm Industrial Units are set back from road and are not prominent from the A29, whilst Brinsbury Campus / Architectural Plants both retain a semi-commercial / rural character. It is therefore not considered that these features are appreciable from the site and or that they directly impact on the site's character. It is further noted that the remaining land along the A29 comprises of open agricultural fields bound by hedgerow and treelines reinforcing the rural character along the A29.

Given the above, whilst officers acknowledged the existing urbanising influencing within the site, the siting of up to 93 residential dwellings would introduce a residential / suburban character that would be at odds with the site's context. In addition, given the degree of separation between the application site and Codmore Hill, residential development in this location would not form a logical extension of existing settlement built form and would appear as an isolated block of residential development alongside the A29.

The Landscape Officer has additionally raised a number of points which, whilst fundamental to achieving a quality scheme, could be addressed within a final layout at reserved matters. This includes;

- Concerns regarding rear gardens adjacent to boundary vegetation which may undermine these landscape features.
- The need to provide multifunctional green corridors as an integral part of the scheme and the potential to front dwellings onto green corridors,
- The need to improve the pedestrian connections within the site which are largely positioned behind garden fencing at this time and to strengthen connection in to the PRoW.
- The potential to incorporate a green corridor and landscape buffer to the north west of the site.
- The need to consider the relationship between parking and public open space.
- concerns regarding the long-term management and maintenance of the existing boundary vegetation and the siting of proposed planting / street trees.

It is noted that the applicant has provided a response to the Landscape Officer's comments (dated 10/09/2026). This has been reviewed by Officers and the comments are noted, however, they do not alter the above consideration.

South Downs National Park

The application site is located approximately 525m northwest and 2.5km south of the South Downs National Park (SDNP). The SDNP have been consulted on the proposal and have outlined the need to consider and seek to further the specified purposes of the National Park which are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

The SDNP have noted that the 'development would result in impacts to the setting of the National Park.' In this instance, it is not clear that the site would be experienced prominently from within the SDNP itself, however, given the site's proximity to the designation the impacts set out above would be experienced within the setting of the SDNP. Nonetheless this is not considered to amount to direct conflict with the furthering purposes of National Park policy or conflict with NPPF Policy N4.

Arboriculture

The application site and immediate surroundings do not contain any areas of Ancient Woodland or Trees Preservation Orders. The existing field boundaries are, however, densely vegetated including

a number of mature trees which act as a landscape buffer, frame / enclose the site and add substantially to the site's rural character.

The Council's Arboricultural Officer has reviewed the proposal, noting that proposal would not result in the removal of any mature trees or trees that make a positive contribution to the landscape. Notwithstanding this, plots 1, 21-26, 28-31, and 48-49 currently have poor relationships with existing boundary trees. This would likely place long term pressures for future residents to lop/fell trees due restricted light within private amenity areas, and impacts on the usability of amenity areas due to tree branching and rooting.

Whilst it is acknowledged that internal layout is reserved at this time, any future reserved matters application should address this conflict by excluding the root protection areas of the trees from any rear amenity areas of the new residential properties. Officers are satisfied that there is space within the layout to make these amendments. In the event the application is approved, the Officer has requested a pre-commencement condition to secure a final detail of on-site tree protection / works.

Summary

In summary, whilst Officers note the site layout and final design of dwellings are reserved at this time, and whilst it is acknowledged that a portion of the site contains urbanising influences, the proposed development would expand significantly beyond this area and would introduce an isolated block of residential and suburban character at odds with the site's wider rural context. The site's location would also fail to provide a natural continuation of development from Codmore Hill resulting in an isolated block of residential development in the countryside. It is noted that this would be experienced within the setting of the SDNP.

Residential Amenity:

Policy 33 of the HDPF requires development is designed to avoid unacceptable harm to the amenity of occupiers / users of nearby property and land. Policy 32 of the HDPF, further, seeks to ensure that development provides an attractive, functional, accessible and adaptable environment.

NPPF Policy P3.2 sets out that development should protect the amenity of residents and sets out that developments should not result in the loss of light to neighbouring dwellings or any unacceptable levels of air, noise, artificial light, water, soil pollution.

In this instance the closest residential dwellings are 'Mill House' which is located east of the A29 opposite the site, dwellings along Black Gate Lane which have gardens that back onto the site, and 'Foxlands' which is located to the west adjacent to the proposed BNG site. The site itself also includes 'Stanes Cottage' and four mobiles homes which would be removed as part of the proposal.

Amenity of Neighbouring Dwellings

Whilst it is noted that site layout is reserved at this time, the proposal comprises relatively low density development with the indicative layout serving to demonstrate that an appropriate relationship with existing dwellings could be achieved without giving rise to any unacceptable concerns of overshadowing, overlooking or overbearing impact.

Amenity of future residents

The proposal has been reviewed by the Council's Environmental Health Team who have noted that the application site is located adjacent to the A29 resulting in noticeable road noise within the site. In addition, the proposal includes commercial elements which may require external plant and will need to be serviced by delivery vehicles. These elements raise some concerns regarding the amenity of future residents. The Council's Environmental Health Team have therefore requested a noise impact assessment and note that the site layout should be designed in accordance with ProPG: Planning & Noise.

As set out above, the site layout is indicative at this time, and a detailed layout would be required within any future reserved matters application. Given the relatively low density of the development, Officers are satisfied that, from a technical perspective, the site layout could be amended to relocate

dwelling further from the road, arrange dwellings so as to avoid potential amenity impacts, and/or to introduce acoustic insulation, mitigation and ventilation as a last resort. Officers are therefore satisfied that in the event planning permission was granted acoustic impacts could be addressed via a suitably worded planning condition to secure a noise impact assessment at reserved matters.

Construction Impacts

There remains the potential for some limited loss of amenity during construction, through increased noise, traffic movements, dust and pollution. Whilst these impacts would be temporary in nature it is considered appropriate to secure a Construction Environmental Management Plan (CEMP) to manage these impacts. This could be secured and implemented via a suitably worded planning condition.

Summary

In summary, with the above condition in place it is not considered that the proposal would give rise to any unacceptable amenity impacts and would therefore accord with HDPF Policy 33 and NPPF Policy P3.

Drainage and Flood Risk:

HDPF Policy 38 requires development to follow a sequential approach to flood-risk, giving priority to sites and layouts which minimise vulnerability to flood risk and without increasing flood risk elsewhere.

NPPF Policy F4 requires a site-specific flood-risk assessment for development on land at risk of flooding, including surface water flooding. NPPF Policy F7 requires proposals to be refused unless the site is designed sequentially, siting the most vulnerable development in areas of lowest flood risk, the development would be safe throughout its lifetime taking account of the vulnerability of its users, any residual risk can be safely managed including the provision of safe access and escape routes, the development is appropriately flood resistant and the flood risk will not be increased elsewhere.

NPPF Policy F8 requires the appropriate use of multifunctional Sustainable Drainage Systems (SuDS) to control flow rates and reduce volumes of runoff.

Flood Risk / Surface Water Flooding

The latest EA flood risk mapping shows the site and site access falling entirely within Flood Zone 1 and are therefore not considered at risk of flooding from fluvial flooding, including when factoring for climate change to years 2070 - 2125. Mapping additionally shows a degree of sporadic surface water flooding (pluvial flooding) located around the existing Toat Café / car wash, adjacent to the existing dwelling (Stanes Cottage) and along the field boundaries which interest the site. This flooding is modelled at an annual likelihood of 1:30 when factoring for climate change to years 2070 - 2125.

The proposal has been reviewed by WSCC Lead Local Flood Authority (LLFA) who have raised concerns that the site layout does not follow sequential approach with regards to surface water flood risk. The LLFA specially note that that the block of apartments plots 71-93 would be sited within an area of known surface water risk and have advised that the LPA should consider the sequential test requirements prior to determination.

Officers note that the site layout remains in outline at this time and that areas of surface water flooding impacts a proportionally small area of the site, primarily within areas of existing hard standing. It is therefore considered that the sequential siting of development could be achieved at reserved matters noting that this would require revisions to the site layout alongside up to date surface water modelling.

Foul Water connection

The development proposes to discharge foul water into an existing Southern Water sewer located approximately 630m south west of the site entrance. Southern Water have confirmed that this is the

closest potential connection point and that sufficient capacity is present within the network to accommodate the proposal. Notwithstanding this, Southern Water highlight it would be for the developer to provide the sewerage infrastructure up to the point of practical connection. This would require the developer to facilitate the approximately 630m sewer connection into the existing network. Should the application be granted it is considered that final details of the foul connection into the main sewer network could be secured via pre-commencement planning condition.

Surface water drainage

The applicant has submitted a Drainage Report which outlines that surface water would be stored within a detention basin within the northern corner the site, within the existing ditch network and within swales and a smaller detention basin within the open areas of the site. Surface water is then proposed to be discharged to a ditch located at the northern boundary of the site.

The proposal has been reviewed by the WSCC LLFA who have raised an Objection as the application has not yet demonstrated connectivity of the on-site ditches/watercourses within the wider watercourse network or that the receiving watercourses could receive the flows from the site. The LLFA Officer notes that the “ability to discharge surface water is a key consideration at the outline planning stage and we must be satisfied the site has a robust method of draining without increasing flood risk offsite.”

Whilst the applicant has responded to the LLFAs by providing a map showing contours and the river to the north of the site, the LLFA maintain that insufficient detail has yet been provided and have specifically requested a map ‘clearly demonstrating the watercourse network, including any available bank and hard bed levels.’ In the absence of this information, Officers cannot be satisfied that the application site could be sufficiently drained and would not result in an increased risk of flooding elsewhere. It has therefore not been demonstrated that the proposal would accord with HDPF Policy 38 or NPPF Policy F7.

Rainwater Harvesting

It is noted that the application seeks to include rainwater harvesting within each dwelling to serve internal toilets and external garden taps. No specific details of this have been provided at this stage, however, should the application be approved full details of this could be secured via secured via a suitably worded planning condition so as to ensure the acceptability of this from an environmental health perspective. It is noted that rainwater harvesting is not a requirement of the surface water drainage strategy and has not been factored into surface water retention.

Summary

In summary, whilst Officers are satisfied that a final site layout could be arranged sequentially taking into account surface water modelling, the LLFA have objected to the proposal as it has not yet been demonstrated that the site could be sufficiently drained and that the proposal would not result in an increased risk of flooding elsewhere contrary to HDPF Policy 38 or NPPF Policy F7.

Highways Impacts:

HDPF Policy 40 states that development will be supported if it is appropriate and in scale to the existing transport infrastructure, including public transport; is integrated with the wider network of routes, including public rights of way and cycle paths, and includes opportunities for sustainable transport. HDPF Policy 40.2 requires proposal to maintain and improve the existing transport system whilst HDPF Policy 40.9 requires proposals to provide safe and suitable access for all vehicles, pedestrians, cyclists, horses riders, public transport and the delivery of goods.

NPPF Policy TR6 requires proposals that are likely to generate significant amounts of movement to be supported by a transport statement / assessment and a travel plan. These should be proportional to the development and should reflect the transport vision for the development and the transport strategy for the area in which it is located.

NPPF Policy T6.4 further states that development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including

cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement.

Vehicle Access / Visibility

The site is proposed to be accessed via a new three-arm roundabout onto the A29 (Stane Street). The A29 has posted national speed limit with speed surveys having established the 85th percentile speeds of between 49.1mph and 51.8mph. WSCC Highways Authority have confirmed that acceptable visibility splays can be achieved in accordance with these speeds.

The application is accompanied by a Stage 1 Road Safety Audit (RSA), however, WSCC Highways Authority have queried whether the RSA (dated 27th February 2026) has taken into consideration the most recent access drawing 6301-005 (dated 7th August 2026). The Highways Authority has advised that if amendments have not been considered within the RSA, then the RSA should be updated accordingly.

WSCC Highways Authority also note that a number of points raised within the RSA have not been agreed by the design team and therefore remain unresolved. The Highways Authority notes these will need to be addressed, however, given it remains unclear if the RSA has taken into account the latest drawings, the outstanding points have not been taken through an internal review.

It is further noted that a Design Audit has not been provided for proposed three-arm roundabout as requested within the Officers initial comment (20/07/2026). This is required prior to determination to allow WSCC Highways Authority to make a full assessment of the site access.

Given the above, whilst the Highways Authority have noted visibility splays can be achieved, Officers are not satisfied that sufficient information has been provided at this stage to demonstrate that the proposed access arrangements would provide a safe and suitable access to the development and that the proposed access would not result in an unacceptable impact on highway safety. The proposal would therefore fail to accord with HDPF Policy 40 and NPPF Policy TR6.

Traffic / highways capacity

Trip Rate Information Computer System (TRICS) has been undertaken to assess traffic flows from the existing and proposed use. The existing use is expected to generate 202 daily movements with 14/15 movements in the AM and PM Peaks. The proposed development (93 dwellings) would generate approximately 426 two-way trips daily with up to 54 two-way trips in the AM peak and 43 two-way trips in the PM peak. This has been modelled to the year 2032 with no capacity concerns at the site access being identified. WSCC Highways also note that the proposal would result in a minimal increase to the wider road network.

Internal Layout and Parking

The internal layout of the site is a reserved matter and would be subject to detailed review within a reserved matters application, this includes ensuring accordance with WSCC parking and cycle parking standards.

Public Rights of way

The closest Public Rights of Way are Public Footpaths 1986 and 1986_1 which wrap around the north and western boundaries of the site, and Public footpath 1997-1 to the east of the site on the other side of Stane Street. Officers note that these footpaths are currently substantially overgrown and difficult to pass.

The WSCC Public Rights of Way Officer has reviewed the proposal noting that of Public Footpaths 1986 / 1986_1 would serve as a link to the development and have therefore requested a financial contribution of £42,600 in order to carry out improvement works to Footpaths 1986 / 1986_1. This could be secured within a section 106 agreement. It is noted that the proposal does not seek any additional access points directly onto the PRoW network, however, this matter could reasonably be addressed at reserved matters.

Sustainable Transport

A full assessment of Sustainable Transport has been made earlier in this report under the heading 'Site Connectivity and Sustainability'.

Summary

In summary, whilst the Highways Authority have noted visibility splays can be achieved, and that the proposed traffic volumes would not result in unacceptable impacts in the wider road network, Officers are not satisfied that sufficient information has been provided at this stage to demonstrate that the proposed access arrangements would provide a safe and suitable access to the development and that the proposed access would not result in an unacceptable impact on highway safety. The proposal would therefore fail to accord with HDPF Policy 40 and NPPF Policy TR6.

Ecology:

HDPF Policy 31 states that development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites.

NPPF Policy N2 outlines that proposals should minimise any adverse impacts on biodiversity and include features which support priority or threatened species and that If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or compensated for, then the development should be refused.

NPPF Policy N6 outlines that development proposals affecting sites of international importance should be refused unless an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site, or the proposal can satisfy the derogation tests, and/or the impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

The proposal has been reviewed by the Council's Ecologist and NatureSpace who have reviewed the application alongside the submitted Preliminary Roost Assessment Report and Daytime Bat Walkover and Ground Level Tree Assessment (PRA) Version 4 (ROAVR Group, December 2025) and Preliminary Ecological Appraisal Report (PEAR) (Enims Ltd., June 2025).

Accuracy / scope of submitted reports

The Council's Ecologist has noted that the submitted PRA and PEAR both include an incorrect red line boundary omitting the north western portion of the site which is proposed to include a pump track and drainage basin. It therefore remains unclear that the entirety of the site has been surveyed, and both the PRA and PEAR are considered to provide an incomplete assessment of the site. The Council's Ecologist has requested clarification as to the area surveyed in addition to an ecological walkover survey for the northern aspect of the site. This has not been submitted at this time.

Bats

The applicant's Preliminary Roost Assessment Report (PRAR) outlines that the Building B1 (modern red brick house) is a confirmed bat roost and Building B6 (toilet block) has been identified as having a low bat roost potential. Both buildings are proposed to be removed as part of the proposal. The Council Ecologist has therefore highlighted the need for further surveys (emergence surveys) to inform / confirm any necessary mitigation measures. Officers note these surveys are recommended within the submitted PRAR, however, do not form part of the application submission.

The Ecologist also notes that trees T3 (Crack Willow), T4 (dead Oak), Group G3, T26 (English Oak), T31 (English Oak), T34 (dead Oak) and T51 (dead Oak) have Potential Roost Features for multiple bats. The Officer has therefore requested an assessment of the impacts to roosting bats within these trees. This assessment is also recommended within the submitted PRAR, however, did not form part of the application submission.

The Council's Ecologist has also noted that further bat activity surveys using static detectors over six months to assess the use of the site by foraging and commuting bats are required. As above, this is recommended within the submitted PRAR, however has not been provided.

Reptiles

The Council's Ecologist has reviewed the submitted Preliminary Ecological Appraisal Report (PEAR) noting that the site has significant suitable habitat on site for reptiles with scrub and grassland present. A reptile survey is therefore required prior to determination of this application. It is noted that this survey is recommended within the submitted PEA, however, has not been provided.

International Sites

The site lies approximately 3.9km southeast of The Mens Special Area of Conservation (SAC) and 9.0km east of Ebernoe Common SAC. Given this siting, all potential impacts to the Barbastelle bat must be assessed including severance to flightlines. Given the above outstanding ecological surveys including the incomplete PEAR it has not been possible to make a full assessment of the proposals potential impact on the SACs or to undertake a Habitats Regulations Assessment (HRA) / Appropriate Assessment. The proposal therefore fails to accord with NPPF Policy N6.

Great Crested Newts

The proposal has also been reviewed by NatureSpace who have assessed the potential impact on Great Crested Newts. The NatureSpace Officer notes that the application site falls within falls within the amber impact risk zone for great crested newts where there is suitable habitat and a high likelihood of great crested newt presence. In addition, there are 8 ponds within 500m of the development proposal, the closest of which is located 20m to the west. The proximity of the pond to the west is also identified within the submitted Preliminary Ecological Appraisal (PEA) which recommends a further survey work to be carried out.

NatureSpace therefore concludes that there is a reasonable likelihood that great crested newts will be impacted by the development and recommends that further surveys are undertaken to confirm the status of the ponds including the close test pond located 20m west of the site. It is noted that eDNA samples should be taken between April and June, whilst alternative presence/absence surveys should be undertaken March and June. Alternatively, the applicant is able to enter into the Licensing scheme either through the Council's District Licensing or European Protected Species Licensing.

The application has responded to these comments stating that the ponds 500m away from the site have limited connectivity and were therefore ruled out within the PEA. It is also argued that the 'relevant pond has been demonstrated to have no GCN presence through eDNA survey.'

Notwithstanding, this an updated comment from NatureSpace clarifies that no further survey information has been provide for the closest pond, and the applicant has not provided detailed justification as to why other ponds within 250m and 500m have been scoped out from assessment. NatureSpace therefore maintain that further information is still required. As such, in the absence of either additional survey work or evidence that the applicant has entered into the either the Council's District Licensing or European Protected Species Licensing it cannot be concluded that the great crested newts will not be impacted by the development.

Submission of further information

As set out above, the initial submission did not include the necessary protected species surveys including bat surveys, reptile surveys, and GCN surveys. The PRA and PEAR also failed to cover the entirety of the application site. These matters were raised with the applicant on the 20/07/2026 and 22/07/2026 with a request for any revisions / surveys to be submitted by 14/08/2026 to allow sufficient time for any necessary re-consultation. It is also noted that protected species surveys are also each advised within the applicants PRAR.

The applicant made available a 'Nocturnal Emergence Bat Report' (26_BAT2_05_54) assessing the Roosts within buildings B1 and B6 on 02/09/2026. No further ecology surveys or revisions to the PRA and PEAR have been provided. It is noted that this emergence survey is insufficient to address the HDC Ecologist's comment in isolation and has therefore not been accepted by Officers or been subject to reconsultation.

Summary

In summary, insufficient information has been submitted to demonstrate the potential ecological impact of the proposed development. The submitted Preliminary Roost Assessment Report (PRAR) and Preliminary Roost Assessment (PRA) both omit the north western portion of the site and therefore provide an incomplete assessment of the site. In addition, insufficient protected species surveys have been provided to allow a full assessment of the potential impacts to protected species including bats, reptiles, and great crested newts. Furthermore, given the insufficient information provided it has also not been possible to fully assess whether the proposal would have an adverse effect on the integrity of the Mens or Ebernoe Common SACs.

It is highlighted that the presence or absence of protected species, and the extent that they may be affected by the proposed development should be established prior to determination so as to provide the LPA with certainty of likely impacts on legally protected species and be able to secure appropriate mitigation. In the absence of this information the proposal is considered contrary to Policy 31 of the Horsham District Local Plan (2015) and NPPF Policy N2 and N6.

Heritage and Archaeology:

HDPF Policy 34 relates to Cultural and Heritage Assets and states that applications should make a positive contribution to the character and distinctiveness of the area and ensure that development in Conservation Areas is consistent with special character of the area.

NPPF Policy HE4 sets out that heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. Policy HE5 sets out that assessments of the potential effects on the significance of heritage assets should identify the degree of harm and Policy HE6 sets out that where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.

The application site is not located within or adjacent to a Conservation Area, however, Mill House (Grade II) is located to the east of the site alongside the A29 (Stane Street). In addition, Cherry Tree Cottage (Grade II) and Whitehall Cottage (Grade II) are located approximately 220m to the north west of the site adjacent to the area of proposed off site BNG.

The proposal has been reviewed by HDC's Conservation Officer who has outlined that the proposal would impact the rural setting of Mill House (Grade II) resulting in less than substantial harm, but at the lowest end of that scale. The indicative layout would retain existing trees to the south west of the site and would set dwellings back from the southern boundary with Mill House. Whilst this layout goes some way to mitigating the impact to Mill House, it is noted that the site layout is reserved at this time, and no land use parameter plans have been provided to secure this buffer.

Beyond Mill House, two further listed buildings are located to the north west, Cherry Tree Cottage (Grade II) and Whitehall Cottage (Grade II). These are located to the north west and would be adjacent to the proposed BNG site and would not be substantially impacted by the proposal.

The Conservation officer has also noted that the proposal would result in a direct impact to Stane Street via the introduction of a roundabout. Whilst Stane Street is not a designated heritage asset, the route was laid down by the Romans as a principle route between London and Chichester and therefore has some heritage value.

In the context of the revised NPPF 2026 the above impacts are considered harm to the significant of the Mill House heritage asset, however, at the lower end of this scale. To comply with the

requirements of NPPF policy HE6, the public benefits afforded for by the development principally comprise 93 dwellings including 35% affordable homes. These would be sufficient to outweigh the identified heritage harm.

Archaeology

The application has additionally been reviewed by the Council's Archaeologist who has noted that the submitted desk based archaeological assessment indicates an apparent moderate potential for prehistoric, Roman and medieval archaeological remains. The Officer has requested that, in the event planning permission is granted, an archaeological field evaluation of the site and any subsequently required mitigation measures be secured via planning condition. With this condition in place the Officer raised no objection.

Biodiversity Net Gain (BNG):

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG), unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024, and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development may not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. A legal agreement would be necessary to secure the maintenance and monitoring of the significant onsite biodiversity gains for the required 30 years.

The proposal has been reviewed by the Council's BNG Officer who has outlined the development will have an onsite -50.15% net loss (-9.14 units) in area habitat and a -17.56% net loss (-0.78 units) in hedgerow on-site. The proposal seeks to deliver BNG off site, within an area of blue line land adjacent to the application site. This would result in a +21.19% net gain (+3.86 units) in area habitat and a +10.55% net gain (+0.47 units) in hedgerows.

Notwithstanding this, the Council's BNG Officer has undertaken a site visit, and highlighted a number of discrepancies within the baseline habitat:

- The field to the north of the site is recorded as 'non-cereal crop,' however, the Officer notes that the east and south of the field now include areas of a mosaic of other neutral grassland with tall ruderal to the west.
- There is an extension of bramble scrub within the peripheries of the northern field area.
- A ditch network runs across the site within the central tree line which delineates the northern field. This is currently listed as hedgerow, as opposed to hedgerow habitat with a ditch.
- A wet ditch is located within 5m of the red line boundary to the north of the site.
- 5 trees considered to be a large size class (>60cm and ≤90cm) are indicated for removal within the Arboricultural Method Statement, however, have not been accounted for within the baseline.

The officer therefore concludes that baseline assessment is considered incorrect and has raised a holding objection accordingly. Officers have requested that amendments to the baseline in line with the BNG Officers Comments, however, details have not been provided within sufficient time to determine the application. In the absence of any further modification or information considering the comments of the Ecologist, the HDC Ecologist recommends refusal on the grounds that the baseline information is incorrect.

It is highlighted that as these matters relate to the baseline and that an accurate and common understanding of the existing habitats baseline of the application site cannot be established within a biodiversity gain plan or secured via the statutory condition. The Council, accordingly, cannot determine whether the statutory biodiversity gain condition is capable of being successfully discharged, or that the development proposals have appropriately adhered to the Biodiversity Gain Hierarchy. In the absence of acceptable details, and as the baseline is not considered correct, the Council cannot conclude that the proposal would prove capable of discharging the statutory biodiversity gain condition, as required by Paragraph 002 and 019 to the relevant Planning Practice Guidance document. Refusal is therefore recommended on these grounds.

The BNG Officer additionally notes a number of discrepancies within the post-development habitat and that a draft HMMP has not been submitted. In this instance, given the proposal is outline only and does not seek to secure significant onsite BNG these matters are capable of being addressed both at reserved matters and within a biodiversity gain plan secured via a standard deemed condition.

It is noted that given the proposal is seeking to secure BNG offsite, within land under the ownership of the applicant this should be secured within a via a S106 agreement for the necessary 30 years.

Education Provision:

The proposal has been reviewed by West Sussex Education Services who have outlined that there is no need for on-site primary or secondary education facilities in this instance. Any required expansion of existing facilities would be funded via Community Infrastructure Levy (CIL). This would include any increased demand for local school places and covers all children from 0-18 and up to 25 for SEND pupils.

Contaminated Land

The application site comprises both previously developed and undeveloped greenfield land, including an area which has previously been used to deposit waste. The proposal seeks to introduce a residential use to the site which is sensitive to the presence of contamination necessitating the need to ensure the site is suitable for residential development. The applicant has submitted a Ground Contamination Risk Assessment Report, dated 14.05.26 which has been reviewed by the Council's Environmental Health Officer. The Officer has raised an initial comment requesting clarification on a number of points within the report where details were either missing or illegible. Notwithstanding this, the Officer has confirmed that these details could be secured via condition within a scheme to deal with the risks associated with contamination and a remediation scheme.

Climate Change / Air Quality Impact

HDPF Policies 35, 36 and 37 require that development mitigates the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity, and promoting sustainable transport modes. NPPF Policy P3 sets out the development should be consistent with the objectives of relevant Air Quality Action Plans. The application site is not located within or close to any of the district's defined Air Quality Management Areas (AQMAs), however, on account of the quantum of development, comprising a 'major' development the Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex requires an Air Quality Assessment (AQA) and Emissions Mitigation Statement to be submitted.

In this instance, the applicant has not provided an AQA or an Emissions Mitigation Statement. Nonetheless, it is considered these can be secured via a suitably worded planning condition to including a total damage cost arising from the proposed development over 5 years and suitable mitigation measures to offset this damage cost. Officers note that provision of EV chargers is now part of Building Regulations under Part S, and covered by the WSCC standards, so a robust AQA must go over and beyond the standards in place under other legislations.

Minerals and Waste:

Under the West Sussex Joint Minerals Local Plan (JMLP July 2018) the site falls within a Brick Clay (Weald Clay) Mineral Safeguarding Area resulting in the sterilisation of approximately some 6.4 of land, preventing future extraction. Policy M9 (iii) of the West Sussex Joint Minerals Local Plan requires that for non-mineral development (such as residential development), the decision maker must determine whether the overriding need for the development outweighs the safeguarding of the mineral. In addition, the applicant must demonstrate that prior extraction is not practicable or environmentally feasible.

WSCC Minerals and Waste have noted that a Mineral Resource Assessment (MRA) had not been provided in this instance and has therefore objected to the proposal. Following this objection, the applicant has provided a MRA (dated 10/09/2026) which concludes that due to the nearby existing residential properties and road network, the exploitation of this resource is unlikely to be commercially or socially viable. Officers further note that there is a relative abundance of Brick Clay in the south east, along with a 25 year landbank of material being met by existing operators within the county. In addition, the housing need in the district is considered to outweigh the need to secure this site for potential future extraction of Brick Clay. Therefore, when considered on balance, the proposal satisfies the requirements of Policy M9 (iii) of the West Sussex Joint Minerals Local Plan.

Water Neutrality:

A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.

On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day. This assessment has been made based on dwellings meeting optional building regulation G2 to limit the water usage of each dwelling to no more than 110 litres per person day as required under Policy 37 Sustainable Construction. In the event permission is granted this should be secured via a suitably worded planning condition.

Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects,

thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

S106 Agreement and Community Infrastructure Levy (CIL):

As noted throughout this report, there are a number of areas where, should planning permission be granted, it would be necessary to secure infrastructure via a s106 legal agreement. The headline obligations are as follows, however. the proposed development has not been accompanied by a completed s106 Legal Agreement at this time:

- Offsite BNG
- Affordable Housing provision (35% affordable with a 70/30 split)
- Contribution of £42,600 to Public Footpaths 1986 / 1986_1 enhancements to re-surface and ensure year round access.
- Relocation of bus stops including provision of Real Time Passenger Information and hardwood 'rural-type' shelters.
- Street lighting along the A29.
- Widening of Footpaths along A29.
- Travel Plan to include:
 - E-bike charging ports
 - EV Charging points
 - Lift Share Club;
 - Travel Plan Notice Board/Website;
 - Car Club Scheme;
 - Travel Welcome Pack for Residents
 - Bus passes for households
- Travel Plan Monitoring Fee of £4,110

Conclusions and Planning Balance:

In summary, the proposed development, when considered as a whole, conflicts with the requirements of HDPF Policies 2, 3, 4 and 26 and PNP Policy 1 as the site falls within a countryside location, is not allocated for the proposed development and is not considered to have an essential need for a countryside location. Whilst this report notes commercial development within the allocation could be considered acceptable in principle, Officers note that the application site far exceeds the allocated area of PNP Policy 8 and also proposes the siting of residential development which does not form part of the allocation. Further to this it is not yet been clearly demonstrated that site allocation PNP Policy 8 is no longer needed or viable for employment use specifically within Class E, B2 or B8. The proposal therefore also fails to attract the support of PNP Policy 8. The principle of development is therefore not supported by the adopted development plan.

This report has also considered the proposal's accordance with NPPF Policies S3, S4 and S5 noting that the proposal fails to attract in-principle support from NPPF S5(1) Part 'h' - Well-connected stations, Part 'j' - Evidenced unmet housing need, Part 'd' – Previously Development Land, or Part 'i' – Allocated Development. NPPF S5(4) therefore sets out that the development should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.

In this instance, the benefits of the proposal would be the siting of 93 residential dwellings, including 35% affordable, this is however weighted within NPPF S5(1) part 'j' relating to evidenced unmet housing need. Beyond housing provision, the proposal would provide some temporary economic benefits during the construction of the development and via the provision of open space, including the proposed pump track. Employment generated by the proposals would be neutral given it would replace/offset the loss of similar employment on the site.

In regard to sustainability, it is not considered that the application site is located to promote sustainable patterns of movement, to limit the need to travel or that the proposal provides a genuine choice of transport modes for residents and users. This is in large part due to the limited provision

of services and facilities accessible to residents and the site's poor pedestrian connectivity which would act as a significant barrier to both walking and bus provision. The proposal therefore fails to accord with NPPF Policies TR3, TR4 and CC2 and HDPF Policies 2, 3, 4 and 40.

In regard to landscape impact, Officers note the site layout and final design of dwellings are reserved at this time, and whilst it is acknowledged that a portion of the site adjacent to the A29 contains urbanising influences, the proposed development would expand significantly beyond this area and would introduce a residential and suburban character at odds with the sites wider context. The site's location would also fail to provide a natural continuation of development from Codmore Hill resulting in an isolated block of residential development in the countryside. It is noted that this would be experienced within the setting of the SDNP.

In regard to highways, insufficient information has been provided to demonstrate the proposed access arrangements would provide a safe and suitable access to the development and that the proposed access would not result in an unacceptable impact on highway safety. This would be contrary to HDPF Policy 40 NPPF and Policy TR6.

In regard to site drainage, it has not yet been demonstrated that the proposal could be adequately drained without increasing the risk of flooding elsewhere contrary to HDPF Policy 38 or NPPF Policy F7.

In regard to Ecology, Officers note that the submitted Preliminary Roost Assessment Report (PRAR) and Preliminary Roost Assessment (PRA) both omit the north western portion of the site and therefore provide an incomplete assessment of the site. In addition, insufficient information has been provided to fully assess the potential impact to protected species including Bats, Reptiles and Great Crested Newts. Furthermore, given the insufficient information provided it has also not been possible to fully assess whether the proposal would have an adverse effect on the integrity of the Mens or Ebernoe Common SACs. It is noted that presence or absence of protected species, and the extent that they may be affected by the proposed development should be established prior to determination so as to provide the LPA with certainty of likely impacts on legally protected species and be able to secure appropriate mitigation. In the absence of this information the proposal is therefore considered contrary to Policy 31 of the Horsham District Local Plan (2015) and NPPF Policies N2 and N6.

In regard to BNG, this report has outlined that a number of errors have been identified within the submitted Biodiversity Net Gain metric. These errors are such that an accurate and common understanding of the existing habitats baseline of the application site has not been provided. These details cannot be secured via condition, and it cannot, therefore, be concluded that the development proposals would prove capable of discharging the statutory Biodiversity Net Gain condition.

The remainder of the scheme has been found to be acceptable subject to conditions and a legal agreement. This includes Housing Mix and Affordable Housing, Residential Amenity, Heritage and Archaeology, Education Provision, Contaminated Land, Climate Change / Air Quality Impact, Minerals and Waste and Water Neutrality. Notwithstanding this, it is noted that a legal agreement has not been entered into at this time to secure necessary affordable housing provision, offsite BNG, footpath enhancement, highways / bus stop improvements or the travel plan.

Pulborough Neighbourhood Plan

The Pulborough neighbourhood plan was formally made on 08 October 2025 and meets both criteria 'a' and 'b' of NPPF Policy S6. As such NPPF Policy S6 indicates that the benefits of approving development are likely to be substantially outweighed by the adverse effects of the conflict with the Pulborough Neighbourhood Plan. In this instance, the specific conflict with the relates to conflict with PNP Policies 1 and 8 set as set out above.

NPPF Annex A

It is noted that NPPF 2026 Annex A sets out that Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. In this instance it is noted that HDPF Policy 2, 3, 4 and 26 are

out of date and therefore given very limited weight. Notwithstanding this, as set out above the proposal conflicts with a number of Policies within the NPPF.

Final Planning Balance

Given the above, the principle of development is not supported by the adopted development plan, and the proposal would fail to attract support from NPPF Policy S5 pertaining to development outside of settlement boundaries. It is further not considered that the proposal has demonstrated exceptional circumstances as required by NPPF Policy S5(4), where the benefits of the proposal would substantially outweigh the adverse effects. The principle of development is therefore considered to be contrary to HDPF Policies 2, 3, 4 and 26 (to which very limited weight is given), PNP Policies 1 and 8, and NPPF Policies S3 and S5.

It has also not been sufficiently evidenced at this time that commercial allocation PNP Policy 8 is no longer needed or viable for employment uses, specifically those uses within Class E, B2 or B8 which have a reduced reliance on residential catchment or roadside traffic.

The site is also not located to promote sustainable patterns of movement, to limit the need to travel or that the proposal provides a genuine choice of transport modes for residents and users contrary to NPPF Policies TR3, TR4 and CC2 and HDPF Policies 2, 3, 4 and 40. Further, matters of highways, drainage, ecology and BNG remain contrary to HDPF Policies 31, 38, 40 NPPF and Policies TR6, F7, N2 and N6 and Paragraph 002 and 019 of the Biodiversity Net Gain Planning Practice Guidance.

The proposed is also not accompanied by a completed s106 Legal Agreement to secure obligations required to make the development acceptable contrary to Policies 16, 31 and 39 of the Horsham District Planning Framework (2015).

Specific reasons for refusal are set out below.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Horsham District Council has adopted a Community Infrastructure Levy (CIL) Charging Schedule which took effect on 1st October 2017. **This development constitutes CIL liable development.**

In the case of outline applications the CIL charge will be calculated at the relevant reserved matters stage.

Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Supporting Statement	BNG assessment	25_BNG_10_78 REV 4	20.05.2026
Supporting Statement	Biodiversity metric calculator	NONE	20.05.2026
Supporting Statement	Drainage report	TCP01	20.05.2026
Supporting Statement	Preliminary ecological appraisal	EC2338	20.05.2026
Supporting Statement	Framework Travel Plan	ITR.6301.TP.4	20.05.2026
Supporting Statement	Preliminary ground contamination risk assessment report, parts 1 to 3	R17021 REV 3	20.05.2026
Supporting Statement	Arboricultural Method	NONE	20.05.2026
Supporting Statement	Preliminary Roost Assessment Report	25_PRA_10_78 REV 4	20.05.2026
Site plan	Existing	1726/S-101	20.05.2026

Contact Officer: Sam Whitehouse

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Location plan	LOCATION PLAN	1726/OS-100	20.05.2026
Supporting Statement	Transport assessment	6301.ITR.CV.TA.7	03.07.2026
Supporting Statement	Highways Technical Response Note	ITR.CV.6301.TRN. 3	19.08.2026

Recommendation: Application Refused

Reason(s) for Refusal:

1. The proposed development would comprise an isolated block of housing located beyond a defined built-up area boundary, involving a site not allocated for residential development within the Horsham District Planning Framework (2015) or the Pulborough Neighbourhood Plan (2015-2031). The proposed development, further, would not attract in-principle support from National Planning Policy Framework (2026) Policies S3 or S5 as it is not physically well-related to an existing settlement or to a well-connected station and is located on land which is in the clear majority not previously developed. The proposal would further not promote sustainable patterns of movement as its location remote from existing settlements and would not provide a genuine choice of transport modes for residents and visitors. The proposal therefore fails to accord with National Planning Policy Framework (2026) Policies S3, S5, TR3, TR4 and CC2 and HDPF Policies 2, 3, 4, 26 and 40. There are deemed to be no material considerations which would outweigh conflict with the above development plan and National Planning Policy Framework policies in these regards.
2. Insufficient information has been provided to demonstrate the allocation PNP Policy 8 is no longer needed or viable for employment uses, with particular regard to those uses within Class E, B2 and B8 to which the site would be well-suited given its location on the strategic road network.
3. Insufficient information has been provided to demonstrate the proposed access arrangements would provide a safe and suitable access to the development and that the proposed access would not result in an unacceptable impact on highway safety contrary to Policy 40 of the Horsham District Planning Framework (2015) and Policy TR6 of the National Planning Policy Framework (2026).
4. Insufficient information has been provided to demonstrate the proposed surface water drainage scheme is sufficiently connected within the wider watercourse network or that the receiving watercourse is able to receive surface water flows from the site. In the absence of this information it has not been demonstrated that the development site would be sufficiently drained and would not result in an increased risk of flooding elsewhere contrary to Policy 38 of the Horsham District Planning Framework (2015) or Policy F7 of the National Planning Policy Framework (2026).
5. Insufficient information has been provided to fully assess the ecological potential of the site or to demonstrate the potential ecological impact of the proposed development, including the potential impact on statutory protected species namely reptiles, bats, and great crested newts. It has further not been demonstrated that the proposal would not have adverse effects on the integrity of the Mens or Ebernoe Common SACs. The proposal therefore fails to accord with Policy 31 of the Horsham District Planning Framework (2015) and Policy N2 and Policy N6 of the National Planning Policy Framework (2026).
6. The statutory Biodiversity Net Gain metric and Assessment have not been satisfactorily completed such as to provide an accurate and common understanding of the existing habitats baseline of the application site. It cannot, therefore, be concluded that the development proposals would prove capable of discharging the statutory Biodiversity Net

Gain condition in conflict with Paragraph 002 and 019 of the Biodiversity Net Gain Planning Practice Guidance.

7. The proposed development has not been accompanied by a completed s106 Legal Agreement, thereby does not secure the units required to be provided as affordable housing units or other infrastructure necessary to make the development acceptable. The proposal is therefore contrary to Policies 16, 31 and 39 of the Horsham District Planning Framework (2015), as it has not been demonstrated how the infrastructure needs of the development would be met.

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

DELEGATED

Case Officer sign/initial Sam Whitehouse Date: 11/09/2026

Authorising Officer sign/initial Adrian Smith Date: 11/09/2026