

National Planning Policy Framework 2026 Note

Land North West of Southwater, Horsham (Planning Application Reference DC/26/0336)

Introduction

- 1.1 This note has been prepared by Nexus Planning in support of outline planning applications (reference: DC/26/0336) at Land North West of Southwater ('the Site'), on behalf of Berkeley Strategic Land Ltd ('Berkeley').
- 1.2 It follows the publication of the revised National Planning Policy Framework ('NPPF') on 17 August 2026 and confirms that the proposed development remains compliant with the national planning policy, in particular the National Development Management Policies ('NDMPs'), as relevant.
- 1.3 The NDMP's contained within the NPPF 2026 do not substantially depart from the national policies contained within the previous iteration of the NPPF (dated 2024). This position is reflected in a recent appeal decision¹.
- 1.4 The development proposals remain compliant with national policy and the publication of the new NPPF does not necessitate re-consultation with statutory consultees.
- 1.5 Therefore, this note does not provide an exhaustive assessment of the development proposal against all new NDMPs, only those of relevance to the principle of development and which otherwise set out specific circumstances in which development should be refused.

Achieving Sustainable Development

- 1.6 NDMP S3 (Presumption in favour of sustainable development) affirms decisions on development proposals should apply a presumption in favour of sustainable development. For development proposals outside settlements, including the Site, NDMP Policy S5 should be applied.
- 1.7 NDMP S5 (Principle of development outside settlements) states that only certain forms of development should be approved outside settlements, as set out within its constituent criteria. These should be approved unless the benefits of doing so would be **substantially** outweighed by any adverse effects (emphasis added).

¹ [6005664 Appeal Decision](#).

- 1.8 NDMP S5(1)(j) includes development that would address an evidenced unmet need (including the provision of housing where local planning authorities cannot demonstrate a five year supply of housing or scores below 75% in the most recent Housing Delivery Test ('HDT')) and where it would be physically well-related to an existing settlement, and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.
- 1.9 The Council accepts that it cannot demonstrate a five year housing land supply of more than 1.7 years². Moreover, the District's 2025 HDT measurement (August 2026), shows 44% delivery against the District's local housing needs over the last three years³, below the 75% threshold.
- 1.10 Furthermore, the Site is located adjacent to the built-up area boundary of Southwater, a Tier 2 settlement in both the current and emerging Local Plan. Southwater benefits from an appropriate level of existing infrastructure to support the proposed development, which would also provide new and enhanced infrastructure to meet the needs of both existing and future residents.
- 1.11 The principle of development is therefore acceptable in respect of NDMP S5. The planning application should therefore be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, or would conflict with other NMDP's which otherwise state that development proposals should be refused in specific circumstances.
- 1.12 These policies, insofar as relevant to the development proposals are assessed later in this note, following the structure of the NPPF.
- 1.13 Notwithstanding the principle of development is established for the entire Site under NDMP S5(j), a significant extent of the Site is allocated for development under Policy SNP2.2 of the Southwater Neighbourhood Plan ('SNP'). NDMP S5(i) provides that proposals for the development of land allocated for that purpose in the development plan (where this lies outside settlements) should be approved.
- 1.14 Finally, NDMP S6 sets out for development proposals involving the provision of housing, the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, provided the neighbourhood plan is (a) less than five years old **and** (b) contains allocations to meet its identified housing requirement.
- 1.15 However, the Southwater Neighbourhood Plan was made part of the development plan in June 2021 and, for the purposes of NDMP S6, subsequently became out of date in June 2026. Therefore, NDMP S6 does not apply in the determination of this application.

² [Horsham District Council Authority Monitoring Report](#).

³ [HDT results 2025.ods](#)

Delivering a sufficient supply of housing

- 1.16 NDMP H07 sets out that **substantial** weight should be given to the benefits of providing homes which will contribute to meeting the evidenced needs of the community.
- 1.17 The Council cannot demonstrate a housing land supply and has historically been unable to meet its housing requirement (as evidenced via its HDT measurement). **Substantial** weight should therefore be given to the provision of housing under NDMP H07.

Ensuring the vitality of town centres

- 1.18 NDMP TC3 sets out that a sequential test should be applied to proposals for main town centre developments outside town centres. Applications which fail to undertake this should be refused.
- 1.19 The planning application is supported by a Retail Impact Assessment ('RIA'). The RIA considers the capacity for new floorspace which would be generated by the proposed development, the impacts on Lintott Square, and also applies a sequential test to justify its necessity. The proposed development is therefore compliant with NDMP TC3.

Making effective use of land

- 1.20 NDMP L3 requires development proposals to make efficient use of land. For proposals outside settlements, development proposals should make the best use of a site's development potential, considering the policies contained within the NPPF. Proposals which fail to make efficient use of land should be refused.
- 1.21 The submitted parameter plans seek to make the most efficient use of land across the various parcels within the overall development, taking into account constraints and the character of each parcel. Further information on densities can be found in the most recent Design and Access Statement. The development proposal complies with NDMP L3.

Achieving well-designed places

- 1.22 NDMP DP3 sets out that development proposals should respond to their context (the history, character and features of their site and its setting) and should reflect relevant aspects of liveability, climate, nature, movement, built form, public space, and identity. Development proposals should be refused if, with clear justification, if they conflict with these principles.
- 1.23 As the application is in outline form, specific details regarding design and layout are not subject for approval at this stage. However, the accompanying Design and Access Statement includes details which confirm that the proposed development reflects these principles in detail. Therefore, the proposed development complies with NDMP DP3.

Promoting sustainable transport

- 1.24 NDMP TR6(4) sets out that development proposals should be refused if they would have a severe adverse impact on the transport network or an unacceptable impact on highway safety; taking into account any mitigation measures as well as any wider network improvements.
- 1.25 The application is supported by a Transport Assessment which demonstrates the proposed development would not result in an increased risk to highway safety and would ensure safe access for users of the public highway network.
- 1.26 Moreover, the proposed development actively promotes sustainable modes of transport, including the enhancements to walking, cycling and public transport networks. The development proposal therefore complies with NDMP TR6(4).

Managing flood risk and coastal change

- 1.27 NDMP F7 sets out development proposals in location known to be at risk from any form of flooding should be refused unless certain conditions can be met.
- 1.28 Firstly, the Site is located wholly with Flood Zone 1, the lowest risk of fluvial flooding and has followed a sequential approach through directing areas to the lowest risk of flooding. Moreover, it is noted that linear features across the Site that are subject to medium-high risk of surface water flooding, the proposals have been informed by a robust surface water and foul water drainage strategy to ensure the proposed development would not result an increased risk of flooding either on or off site. The proposed development therefore complies with NDMP F7.

Conserving and enhancing the natural environment

- 1.29 NDMP N2 sets out that development proposals should contribute positively to the natural environment and support nature recovery, including landscape character, agricultural land, ecological networks, biodiversity and green infrastructure. The policy also sets out that if significant harm to biodiversity cannot be avoided, adequately mitigated or, as a last resort, compensated for, then the development should be refused.
- 1.30 NMDP N6(2) states that development should be refused where it would entail the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees.

- 1.31 In response to NDMP N2 and N6, the proposed development has adopted a landscape led approach, delivering an increase in Biodiversity Net Gain and contributing to West Sussex Local Nature Recovery Strategy. Moreover, the application is accompanied by a suite of technical information which demonstrate that the development proposals would not result in significant adverse harm to the natural environment and, most importantly, not result in significant harm to local biodiversity nor result in the loss or deterioration of any irreplaceable habitats. The development proposals therefore comply with NDMP N2 and N6.

Conserving and enhancing the historic environment

- 1.32 NDMP HE4 sets out that designated heritage assets should be conserved in a manner appropriate to their significance. Any harm to, or loss of, the significance of a designated heritage assets should have clear and convincing justification.
- 1.33 NDMP HE5 sets out that proposals affecting heritage assets should be accompanied by an assessment of the significance of the asset affected; with impacts now categorised as positive, no effect, harm, or total loss.
- 1.34 The Built Heritage Assessment submitted as part of the planning application concludes that the proposed development would result in a low-level harm of to the setting of nearby designated heritage assets and, importantly, would not result in any level of substantial harm.
- 1.35 NDMP HE6(4) confirms that, where a development would harm the significance of a designated heritage asset, the effect on the asset and its significance should be weighed against **any** public benefits of the proposal. Notably, an important public benefit cited in NDMP HE6 includes securing the long-term reuse of a vacant or underused listed building.
- 1.36 The low level of heritage harm identified should therefore be weighed against the public benefits arising from the proposed development, including the heritage benefits associated with the reuse and conservation of the existing historic agricultural buildings surrounding Great House Farmhouse.
- 1.37 As set out in the original Planning Statement, the benefits of the proposed development are considered to significantly outweigh the identified heritage harm.

Conclusion

- 1.38 This note responds to the latest iteration of the NPPF (August 2026). It demonstrates the proposed development remains acceptable, insofar as:
- i. the Council is unable to demonstrate an adequate five-year housing land supply or a compliant HDT result, such that development outside settlement boundaries is acceptable under NDMP S5(1)(j);

- ii. part of the Site is allocated within the SNP and is acceptable under NDMP S5(1)(i)
- iii. there are no other adverse effects that would substantially outweigh the benefits of the proposed development, including the provision of housing; and
- iv. there are no conflicts with the NDMPs that would otherwise indicate that planning permission should be refused, as set out in NDMP S5(2).

1.39 Overall, the proposed development therefore accords with the relevant new NDMPs contained within the NPPF 2026 and should therefore be granted planning permission without delay.