

17 April 2026

FAO: Kate Turner
Senior Planning Officer
Horsham District Council

By email only

SLR Project No.: 433.066607.00001

RE: The Copse Phase 2 – Application Reference DC/26/0355

Construction of up to 23 residential dwellings, (including 9 affordable homes), including access, parking, landscaping, and other associated infrastructure works.

On behalf of our client, Starbuild Ltd., we would like to respond to the following consultation responses received to date.

Housing Officer

The applicant has proposed the following affordable housing mix:

9 one- and two-bedroom homes in the planning it is stated “responding to the identified local need for smaller units suitable for first-time buyers, younger families, and those seeking to downsize”. However, the above data clearly demonstrates a higher need for larger family sized homes in the area. With households with a 3 or 4 bed need waiting on average 4 times longer than those with a 1 or 2 bed need to be rehoused.

No detail has been provided in relation to the tenure split, Housing Officers would expect to see a 70/30 split of the affordable housing provision with 70% of the units (6 units) to be delivered as affordable rent and 30% (3 units) as intermediate rent. Housing Officers would need confirmation of what tenure size was being delivered to each.

Additionally, no information has been provided regarding engagement with a Registered Provider. While it is understood that this is an outline application, it is strongly advised that the applicant consult with a Registered Provider at the earliest opportunity to agree the tenure mix, confirm funding arrangements, and ensure that the proposed layout and unit specifications meet provider requirements.

In the absence of confirmation that a suitable Registered Provider has been secured, and without sufficient evidence demonstrating that the proposed affordable housing provision is deliverable, Housing Officers are unable to support the application in its current form.

SLR Response:

We acknowledge that the wording within the submitted Planning Statement was not clear with regards to the affordable housing provision. We have therefore amended paragraphs 3.4, 4.37, and 7.9 of the Planning Statement accordingly and this now accompanies this response as version V03.

To confirm, the scheme includes a balanced mix of affordable dwelling sizes, this can be seen on the submitted Housing Mix and Tenure Plans and in the table below.

		FL25-2301-010 - Land to the West of The Copse, Worthing Road, Southwater, Horsham, West Sussex.				Schedule to be read in conjunction with PLANNING Drawing FL25-2301-055G			REV G
Plot No.	Ref on plan	Storeys	Bedrooms	Description	People	Tenure	Area (NIA to finish) m ²	Area (NIA to finish) Sqft	NOTES
1	Plot 01, 12	2	3	Detached	5	Market	96.34 m ²	1037 ft ²	M4(2)
2	Plot 02 & 03	2	4	Detached	7	Market	149.24 m ²	1606 ft ²	M4(2)
3	Plot 02 & 03	2	4	Detached	7	Market	149.24 m ²	1606 ft ²	M4(2)
4	Plot 04-05	2.5	4	Semi-detached	7	Affordable	137.40 m ²	1479 ft ²	M4(2)
5	Plot 04-05	2.5	4	Semi-detached	7	Affordable	137.40 m ²	1479 ft ²	M4(2)
6	Plot 06-08	2.5	3	Terrace	4	Affordable	101.86 m ²	1096 ft ²	M4(2)
7	Plot 06-08	2.5	3	Terrace	4	Affordable	101.86 m ²	1096 ft ²	M4(2)
8	Plot 06-08	2.5	3	Terrace	4	Affordable	101.86 m ²	1096 ft ²	M4(2)
9	Plot 09-10, 18-19	2	2	Semi-detached	3	Market	75.50 m ²	813 ft ²	M4(2)
10	Plot 09-10, 18-19	2	2	Semi-detached	3	Market	75.50 m ²	813 ft ²	M4(2)
11	Plot 11	2	3	Detached	6	Market	127.28 m ²	1370 ft ²	M4(2)
12	Plot 01, 12	2	3	Detached	5	Market	96.34 m ²	1037 ft ²	M4(2)
13	Plot 13	1	1	Flat over garage	2	Affordable	67.46 m ²	726 ft ²	/
14	Plot 14-16	2	2	Semi-detached	3	Affordable	71.44 m ²	769 ft ²	M4(2)
15	Plot 14-16	2	2	Semi-detached	3	Affordable	75.50 m ²	813 ft ²	M4(2)
16	Plot 14-16	2	2	Semi-detached	3	Affordable	75.50 m ²	813 ft ²	M4(2)
17	Plot 17 & 20	2	3	Detached	6	Market	127.28 m ²	1370 ft ²	M4(2)
18	Plot 09-10, 18-19	2	2	Semi-detached	3	Market	75.50 m ²	813 ft ²	M4(2)
19	Plot 09-10, 18-19	2	2	Semi-detached	3	Market	75.50 m ²	813 ft ²	M4(2)
20	Plot 17 & 20	2	3	Detached	6	Market	127.28 m ²	1370 ft ²	M4(2)
21	Plot 21	1.5	4	Detached	7	Market	160.56 m ²	1728 ft ²	M4(2)
22	Plot 22	1.5	4	Detached	7	Market	160.56 m ²	1728 ft ²	M4(2)
23	Plot 23	2	3	Detached	5	Market	96.34 m ²	1037 ft ²	M4(2)

Paragraph 7.8 of the Planning Statement confirmed that the tenure split—approximately 70% affordable rent (6No. dwellings) and 30% (3No. dwellings) intermediate rent—reflecting local housing officer guidance.

Southwater Policy SNP3 – Housing Mix encourages a balanced mix of housing types and tenures, including smaller homes for first-time buyers, families, and older residents. The scheme includes a balanced mix of affordable dwelling sizes, in line with this requirement, providing 4No. one- and two-bedroom homes, addressing local needs for smaller units, along with 5No. three- and four-bedroom homes to cater for larger families. The provision for the larger homes is slightly more than the provision of smaller homes, which also aligns with Horsham's housing requirement.

Our client has made contact with a number of Registered Providers including Saxon Weald, Vivid Homes, and Horsham District Homes (owned by Horsham District Council). At this current time only one response has been received. We will keep Horsham advised of the outcome of the discussions.

Reports submitted:

- Planning Statement V03

Historic Environment:

The application is for the development site of c.1.8 ha which is well over the 0.5ha area that requires the results of a search of the West Sussex Historic Environment Record to be provided. Due to the nature and size of the development, which would have a destructive impact on any archaeological remains that may be present, an archaeological desk based assessment should be provided that includes the results of a search of the West Sussex Historic Environment Record and examines all appropriate available sources in order to assess the archaeological potential of the site. The work should be carried out by an appropriately qualified professional heritage organisation to standards set out by the Chartered Institute for Archaeologists.



Once the assessment has been received an informed decision can be made regarding the need for further work to both clarify the archaeological potential and devise appropriate responses to mitigate the threat posed by the proposals to any potential archaeological remains.

SLR Response:

We would request that the search of the West Sussex Historic Environment Record to be provided, is conditioned, as per responses to the previous applications for this site.

Environmental Health - Air:

We note that Air source heat pumps (ASHPs) will be provided within each dwelling to reduce emissions from the development. If incorrectly sited ASHPs can however cause issues with noise, we would be grateful therefore if the applicant can provide a plan showing the proposed locations of the ASHPs on each dwelling.

SLR Response:

A plan showing the location of the air source heat pumps is attached to this response as requested.

Plan submitted:

FL25-2301-065 - Air Source Heat Pump Location Plan

Southwater Parish Council

Southwater Parish Council objects to application DC/26/0355 because:

- *The site lies outside the built-up area boundary and is not allocated for development.*
- *The proposal conflicts with HDPF Policies 2, 4 and 26.*
- *The proposal fails to comply with Southwater Neighbourhood Plan Policies SNP1, SNP2, SNP16 and SNP17.*
- *The principle of development has previously been dismissed at appeal.*
- *The benefits of the scheme do not outweigh the clear and significant policy conflict.*

SLR Response:

We do not intend to respond to every point raised by the Parish Council. However, we have addressed below the matters relevant to compliance with Horsham District Council and Southwater's adopted planning policies.

As set out in the submitted Planning Statement, the site is mostly located outside the settlement boundary of Southwater, as set out in the Horsham District Planning Framework (HDPF). However, the housing and locational policies contained within the HDPF are now long out of date with a considerable increase in demand for housing now required, and a supply of housing that falls far short of the five year requirement at around one year. Therefore, sustainable development should be supported unless there are any adverse impacts that would "significantly and demonstrably outweigh the benefits".

Our proposals are considered to be in accordance with the Shaping Development in Horsham District Planning Advice Note, in that the site benefits from a sustainable and well-connected location, it is considered to be appropriate in scale and function to Southwater, it meets local housing needs, it does not prejudice long-term development, and it is contained within a defensible boundary. Given the current



pressures on housing delivery across the district, the proposal offers social, economic and environmental benefits, including support for local services, improved housing choice, and efficient use of land.

The Southwater Neighbourhood Development Plan (SNDP) was formally adopted by Horsham District Council on 23 June 2021 and remains in force until 22 June 2026. As part of the statutory development plan, it carries weight in the determination of planning applications within Southwater Parish. However, given the significant increase in housing needs since the plan was adopted and as there are only two months remaining before its expiry, the weight that can reasonably be afforded to its policies is now limited.

The submitted Planning Statement sets out in detail how the proposed development accords with the relevant policies of the SNDP and the wider Horsham Development plan. At this stage, we do not consider that there is any further substantive information to add.

We acknowledge that previous applications on the site have either been dismissed at appeal or withdrawn. The knowledge gained from those earlier proposals has directly informed the evolution of the current scheme. Nevertheless, each planning application must be determined on its own merits, taking into account the policy context and material considerations relevant at the time of determination, which may differ from those that applied to earlier proposals.

We have engaged proactively with Southwater Parish Council and discussed the merits of the current application. Their previous comments have been taken into account, and we have explained the benefits of the revised scheme. Aside from their position on the principle of development being against policy and the site outside the BUAB, the Parish Council were generally supportive of the design and content of the proposals.

We look forward to receiving confirmation that our responses above, along with the submitted plans and reports, address the concerns raised to date and that no further information is required. Should you have any questions or wish to discuss any submitted report or plan, please do not hesitate to contact us.

Regards,

SLR Consulting Limited

Debra Higginbotham

Associate Planner - Planning

