



Land East of Henfield Road, Cowfold

Planning and Affordable Housing Statement

May 2026

Land east of Henfield Road (A281), Cowfold

Planning & Affordable Housing Statement

HM/NK/37232

May 2026



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CONTENTS

1	INTRODUCTION.....	8
1.1	OVERVIEW	8
1.2	SUPPORTING DOCUMENTS	8
2	SITE CONTEXT	11
2.1	APPLICATION SITE	11
2.2	PLANNING CONSTRAINTS	12
	Policy and Environmental Designations	12
	Heritage	13
	Flood Risk	13
2.3	SITE-SPECIFIC PLANNING HISTORY	14
3	PROPOSED DEVELOPMENT.....	15
3.1	OVERVIEW	15
3.2	LAYOUT AND DESIGN.....	15
3.3	ACCESS	16
4	PLANNING POLICY FRAMEWORK	18
4.1	OVERVIEW	18
4.2	DEVELOPMENT PLAN.....	18
	Horsham District Planning Framework (2015)	18
	Cowfold Neighbourhood Plan 2019-2031 (October 2025)	19
4.3	OTHER MATERIAL CONSIDERATIONS	20
	National Planning Policy Framework (NPPF) (2024).....	20
	Shaping Development in Horsham District: Planning Advice Note.....	22
4.4	EMERGING POLICIES.....	22
	Emerging Horsham District Local Plan 2023-2040 (Regulation 19).....	22
	Draft NPPF (December 2025)	23
5	PRE-APPLICATION DISCUSSIONS AND PUBLIC CONSULTATIONS	25
5.1	POLICY BACKGROUND	25
5.2	PRE-APPLICATION ADVICE	25
5.3	PUBLIC CONSULTATION	27
6	PLANNING CONSIDERATIONS.....	29
6.1	INTRODUCTION	29
6.2	PRINCIPLE OF DEVELOPMENT	29
	Implications of NPPF Paragraph 14	30
	General Alignment with the Spatial Strategy	32
	Locational Sustainability	35
	Conclusions on the Principle of Development.....	36
6.3	AFFORDABLE HOUSING STATEMENT AND HOUSING MIX.....	36

6.4	INDICATIVE LAYOUT AND DESIGN CONSIDERATIONS	37
	Housing Size and Density	38
	Impact on Local Amenity	39
	Landscape Impact.....	39
	Settlement Coalescence.....	40
6.5	TRANSPORT AND ACCESSIBILITY	41
	Car and Cycle Parking	42
6.6	FLOOD RISK AND DRAINAGE	42
	Surface Water Flood Risk and the Sequential Approach	43
	Indicative Drainage Strategy	43
6.7	ECOLOGY, TREES, AND BIODIVERSITY NET GAIN.....	44
	Trees	44
	Ecology	45
	Ecology and Lighting.....	46
	Biodiversity Net Gain	47
6.8	HERITAGE AND ARCHAEOLOGY	48
	Heritage Statement	48
	Archaeology	49
6.9	OTHER MATTERS	49
	Air Quality.....	49
	Odour	50
	Noise	50
	Contamination.....	51
	Minerals.....	51
	Energy and Sustainability and Utilities.....	52
	Utilities Statement	52
7	SUSTAINABILITY AND THE TILTED BALANCE	53
7.1	SUSTAINABILITY.....	53
7.2	PLANNING BALANCE	54
8	CONCLUSION	57
8.1	SUMMARY	57
	APPENDIX A: TEMPLATE HABITAT MANAGEMENT AND MONITORING PLAN.....	4
9	PROJECT BACKGROUND.....	5
9.1	SUMMARY OF MANAGEMENT PLAN	5
	Site Boundary Plan PB-F01	6
	Site Context Plan PB-F02	8
	Phasing strategy	9
	Roles and Responsibilities	9
9.2	11	
	Land Use Summary	11
	Site Context Photos PB-F03	11
9.3	SITE BASELINE, ENVIRONMENTAL INFORMATION AND ASSOCIATED IMPACTS CHECKLIST PB-	
T01	13	

Baseline and Environmental Information.....	14
10 PLANNED MANAGEMENT ACTIVITIES	15
Principles Informed by Design Stage.....	15
Habitat and Condition Targets PM-T01.....	16
10.1 HABITAT RETENTION	17
10.2 HABITAT RETENTION PLAN PM-F01	17
Creation, Enhancement and Management Targets and Prescriptions	18
10.3 HABITAT CREATION AND MANAGEMENT – RISK REGISTER AND REMEDIAL MEASURES PM-T02	19
11 MONITORING SCHEDULE	20
Monitoring Strategy.....	20
Monitoring Methods and Intervals MS-T01	20
Monitoring Reports	4

Table of Appendices

Appendix A – Template Habitat Maintenance and Monitoring Plan

1 INTRODUCTION

1.1 OVERVIEW

1.1.1 This Planning and Affordable Housing Statement has been prepared by DHA Planning on behalf of Landacre Developments Ltd ("the Applicant"), in relation to the proposed residential development on land east of Henfield Road (A281), Cowfold, West Sussex ('the Site').

1.1.2 The formal description of development is as follows:

"Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for the main site access."

1.1.3 This Application is made in the context that Horsham District Council cannot currently demonstrate a 5-Year Housing Land Supply nor a sufficient Housing Delivery Test result. As a result of this, the 'tilted balance' in favour of sustainable development is engaged in accordance with National Planning Policy Framework (Paragraph 11d).

1.1.4 This Planning and Affordable Housing Statement provides a detailed overview of the Site, its context and the relevant planning history, and a summary of the development proposal. It assesses the planning merits of the scheme with regard to the planning policy framework and material considerations.

1.1.5 It is the conclusion of this Statement that the proposals would deliver a sustainable and high-quality development on a Site, which reads as part of the established settlement of Cowfold. The proposals will significantly contribute to addressing the considerable need for market and affordable homes in the district and in doing so will deliver social, environmental, and economic benefits. The most important policies in the adopted development plan for determining the Application are out-of-date. Any adverse impacts arising from the development are considered to be significantly and demonstrably outweighed.

1.2 SUPPORTING DOCUMENTS

1.2.1 This Planning and Affordable Housing Statement forms part of a suite of documents that support the Application, and it is designed to be read in conjunction with the plans and documents listed in **Tables 1 and 2**.

1.2.2 This Application is accompanied by a series of indicative plans, which demonstrate how a development of approximately 40 dwellings can be accommodated within

the Site. These plans are submitted illustratively, and it is not intended that these plans would be approved as part of any planning permission.

DOCUMENT	AUTHOR
FORMS	
Application Forms & Certificates	DHA Planning
CIL Form 1	Landacre Developments
REPORTS	
Air Quality Assessment	Phlorum
Arboricultural Impact Assessment & Method Statement, plus Tree Survey	Ramsay & Co Landscape Architecture
Archaeological Desk-Based Assessment	Orion
Biodiversity Net Gain Assessment Report, Metric and Condition Assessments	AEWC
Design and Access Statement	ECE Architecture
Landscape and Visual Appraisal	Landscape Management Services
Flood Risk Assessment and Outline Drainage Strategy	GTA
Minerals Safeguarding Assessment	Geo-Environmental
Noise Impact Assessment	Acoustic South East
Odour Assessment	Phlorum
Phase 1 (Ground) Desk Study	Albury S.I. Ltd
Preliminary Ecological Appraisal and River Condition Assessment Report	AEWC
Transport Statement	NEO Transport
Travel Plan (Framework)	

TABLE 1: SUBMITTED DOCUMENTS

PLAN	REFERENCE
Site Location Plan	7724-PL-01
Block Plan	7724-PL-02
Illustrative Site Plan (Coloured)	7724-PL-03
Illustrative Building Height Plan	7724-PL-04
Illustrative Movement and Parking Plan	7724-PL-05
Illustrative Land Budget Plan	7724-PL-06
Illustrative Materials Plan	7724-PL-07

PLAN	REFERENCE
Illustrative Tenure Mix Plan	7724-PL-08
Opportunities and Constraints Plan	7724-PL-09
Key Site Sections A and B	7724-PL-10
Proposed Street Scene A	7724-PL-20
Proposed Street Scene B	7724-PL-21
Proposed CGI View 01	7724-PL-50
Proposed CGI View 02	7724-PL-51
Tree Protection Plan	RCo604/01-02

TABLE 2: SUBMITTED PLANS

2 SITE CONTEXT

2.1 APPLICATION SITE

- 2.1.1 The Site falls within the administrative boundaries of Horsham District Council and Cowfold Parish Council. It is located just outside the built-up area boundary of Cowfold and comprises a broadly rectangular parcel of land measuring approximately 2.59 hectares.
- 2.1.2 The Site is separated into two main field parcels - an eastern and western parcel, split from the north to the south by a tree line. It is predominately covered by grass used for the grazing of horses, with the boundaries lined with trees and hedgerows. A field gate located centrally along the tree belt provides access between the two parcels.
- 2.1.3 To the west, the Site is bounded by the residential dwellings fronting Henfield Road (A281) and a small commercial site; to the north, by the private Eastlands Lane and adjoining dwellings to the south-west; to the east, by sewage treatment works, allotments and an area of woodland; and to the south, by a strong tree belt and two linear paddocks.



FIGURE 2.1: SITE AERIAL (BASE MAP SOURCE: GOOGLE MAPS)

- 2.1.4 The surrounding area is characterised by the established settlement of Cowfold to the north, which is made up of mostly residential dwellings with pockets of commercial and community uses. A strong line of vegetation along the southern boundary separates the Site from the open countryside and sporadic residential

and agricultural development beyond, creating a strong sense of enclosure. The agricultural fields beyond appear more open and rural.

- 2.1.5 To the west, on Henfield Road running parallel to the Site, Bull's Bridge bus stop is found, providing regular services to and between Horsham and Brighton. The bus service also provides access to the Category 1 settlement of Henfield, located 4 miles to the south of the Site. Horsham railway station, approximately a 15-minute drive from the Site, links the Site to the wider region.
- 2.1.6 Access to the Site is currently provided via a track from Henfield Road, running between Oaklands and the properties on South Leas. This access connects to existing pavements running either side of Henfield Road in a north/south direction, which link to a GP surgery, sports facilities, a local supermarket, as well as several specialist shops within the village. The village also has a pre-school, primary school and some clubs and societies.

2.2 PLANNING CONSTRAINTS

Policy and Environmental Designations

- 2.2.1 The Site lies adjacent to the built-up area boundary of Cowfold, as indicated by the black line in **Figure 2.2** below. The Site therefore falls within the countryside at present but within the immediate context of Cowfold village. The land outside of the built-area to the north comprises a vegetated area of woodland and individual structures which means that there is no open visual gap between the southern boundary of Cowfold and the Site (this is not visible on the policy map).



FIGURE 2.2: EXTRACT OF THE HORSHAM DISTRICT PLANNING FRAMEWORK POLICY MAP (SOURCE: HDC WITH RED LINE OVERLAY)

- 2.2.2 The Site is located within the Low Weald National Character Area, but it is not affected by any further spatial or landscape designations such as National Parks or National Landscapes.
- 2.2.3 The Site is located within a mineral safeguarding area for brick clay, as identified by the West Sussex County Council's West Sussex Joint Minerals Local Plan (adopted July 2018).
- 2.2.4 The policies map shows several Tree Preservation Orders (TPO) in proximity to the Site, circled in green. The tree to the north of the Site's entrance is covered by TPO/0762.
- 2.2.5 A review of MAGIC mapping has revealed no Ancient Woodland on or adjacent to the Site. The ecological assessment of the Site has confirmed that all native hedgerows within the Site are priority habitat.

Heritage

- 2.2.6 The Site does not contain any heritage assets and there are no assets in the immediate vicinity. Approximately 65m to the west of the Site, across Henfield Road, the Grade II listed Wood Grange is found (Listing Entry Number: 1193000), with the Grade II listed Bulls House beyond (List Entry Number: 1027083).
- 2.2.7 The Site is approximately 375m south of the Cowfold Conservation Area. It does not fall within an Archaeological Notification Area.

Flood Risk

- 2.2.8 According to the Government's Flood Risk Map, the majority of the Site is located in Flood Zone 1, meaning it is at low risk of flooding from nearby rivers and the sea. The southern boundary is located within Flood Zone 3 meaning it is at high risk of flooding from the watercourse running to the south of the Site. This risk does not extend into the Site to any material extent, as shown in **Figure 2.3** below.
- 2.2.9 A small risk of surface water flooding is found on the Site when modelled against the 1-in-30-year scenario. In the 1-in-1000-year scenario, a strip of surface water risk extends up through a part of the eastern field and along the central treeline, as shown in **Figure 2.4**.

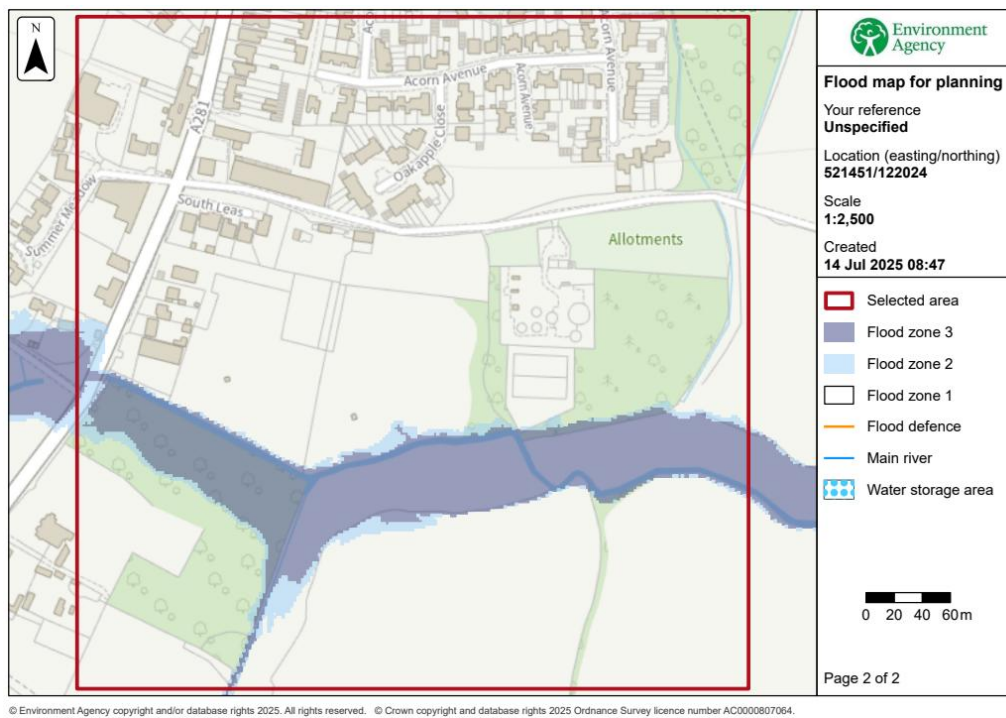


FIGURE 2.3: FLOOD ZONE MAP (ENVIRONMENTAL AGENCY)

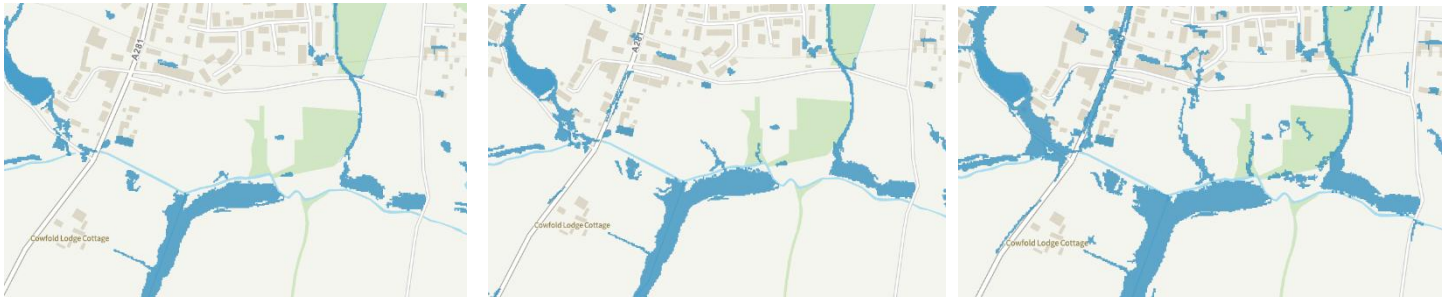


FIGURE 2.4: 1-IN-30-, 1-IN-100- AND 1-IN-1000-YEAR SURFACE WATER FLOODING (ENVIRONMENTAL AGENCY)

2.3 SITE-SPECIFIC PLANNING HISTORY

- 2.3.1 A desk-based search of the HDC online planning register has identified no relevant planning history for the Site.

3 PROPOSED DEVELOPMENT

3.1 OVERVIEW

3.1.1 This Application seeks planning permission for the following development:

"Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for the main site access."

3.1.2 The following Section should be read alongside the accompanying documents, plans, and Design and Access Statement (DAS). As set out in the DAS, the illustrative proposals follow a thorough review of the Site's opportunities and constraints which have shaped the indicative scheme to create a high-quality and distinctive residential environment, informed by Pre-Application engagement with Horsham District Council.

3.2 LAYOUT AND DESIGN

3.2.1 The overarching strategy for the Site is to create a landscape led development that sits comfortably within its edge-of-village context. Whilst in outline, the accompanying submission demonstrates that the Site can deliver a high-quality residential development that reads as a modest extension to Cowfold, without any perceived encroachment on the wider countryside due to the retention of well-established natural landscape features.

3.2.2 The indicative layout is shown in **Figure 3.1** and summarised below:

- Approximately 40 dwellings, comprising 35% affordable housing. The masterplan provides a variety of house types, sizes, and tenures, from 1-bedroom maisonettes to 4-bedroom houses. A tenure-blind design approach ensures that both affordable and market homes are indistinguishable in their external quality and character.
- Upgraded pedestrian and vehicular access from Henfield Road.
- The masterplan comprises two development parcels, separated by the existing central vegetation line as an important landscape feature and green route through the Site. The development areas reflect the desire to retain the majority of the trees within the Site and preserve a strong level of natural screening from the open countryside beyond.
- Areas of open space providing recreation opportunities for existing and future residents. It is envisaged that there would be three main areas of

informal open space within the Site. These will be located along the central tree belt, along the southern boundary of the site, and in the northeastern corner to act as a buffer for the wastewater treatment works. The proposals allow for the provision of currently private land as publicly accessible open land.

- 3.2.3 The scheme design proposed is described in full in the Design and Access Statement, which includes a detailed analysis of the Site, its local context, the design evolution and the justification for the layout, form and external appearance. The DAS contains a series of framework plans and a masterplan, which illustrate how the proposals can be delivered, demonstrating how a development of approximately 40 homes can be accommodated in the Site.



FIGURE 3.1: ILLUSTRATIVE SITE PLAN

3.3 ACCESS

- 3.3.1 Full planning permission is sought for the proposed access arrangement into the Site.
- 3.3.2 The Site is set to be accessed via one primary vehicle access point which will take the form of a simple priority junction from the A281 (Henfield Road). This will

formalise the existing access point located to the northwest of the Site. The access has been designed to be 5.5m wide with a kerb radius of 6m to accommodate a refuse vehicle entering into and egressing from the Site.

- 3.3.3 Pedestrian pavements will be available into the Site and will tie in with the existing pedestrian infrastructure on Henfield Road.

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be made in accordance with the statutory development plan unless material considerations indicate otherwise.
- 4.1.2 The statutory Development Plan relevant to the Site currently comprises:
- Horsham District Planning Framework (2015)
 - Cowfold Neighbourhood Plan (2025)
 - West Sussex Joint Minerals Plan (2018, as amended)
 - West Sussex Waste Local Plan (2014, as amended)
- 4.1.3 Other material considerations of relevance to the determination of this Application include the National Planning Policy Framework ("NPPF" or "the Framework") (2024); the emerging Local Plan (2023-2040); the draft NPPF (December 2025); and relevant supplementary planning documents (SPDs) and guidance adopted at a local level including the Planning Obligations and Affordable Housing SPD (2017) and the Shaping Development in Horsham District Planning Advice Note (2025).

4.2 DEVELOPMENT PLAN

Horsham District Planning Framework (2015)

- 4.2.1 The Horsham District Planning Framework (HDPF) is the overarching planning document for the part of Horsham district falling outside the South Downs National Park. The document was adopted in November 2015 and sets out the planning strategy for the period up to 2031.
- 4.2.2 The policies from the HDPF set out in **Table 3** are considered relevant to this Application.

POLICY	POLICY NAME
1	Sustainable Development
2	Strategic Development
3	Development Hierarchy
4	Settlement Expansion

POLICY	POLICY NAME
15	Housing Provision
16	Meeting Local Housing Needs
24	Environmental Protection
25	The Natural Environment and Landscape Character
26	Countryside Protection
27	Settlement Coalescence
31	Green Infrastructure and Biodiversity
32	The Quality of New Development
33	Development Principles
34	Cultural and Heritage Assets
35	Climate Change
36	Appropriate Energy Use
37	Sustainable Construction
38	Flooding
39	Infrastructure Provision
40	Sustainable Transport
41	Parking

TABLE 3: RELEVANT HDPF POLICIES

Cowfold Neighbourhood Plan 2019-2031 (October 2025)

- 4.2.3 The Cowfold Neighbourhood Plan was made in October 2025 and contains a number of additional development management policies of relevance to applications within the Neighbourhood Plan area. The policies of relevance to this Application are listed in **Table 4**.

POLICY	POLICY NAME
1	Groundwater and Surface-water Flood Risk
2	Green Infrastructure
5	Open Space
9	Residential Development Principles
13	Housing Mix
16	Car Parking Provision

TABLE 4: RELEVANT CNP POLICIES

4.3 OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF) (2024)

- 4.3.1 The NPPF was originally published in March 2012 to provide a single overarching national policy document. A revised NPPF was published in December 2024 and is a material consideration when determining planning applications.
- 4.3.2 The following chapters are considered relevant to the proposal:
- Section 2 – Achieving sustainable development
 - Section 4 – Decision-making
 - Section 5 – Delivering a sufficient supply of homes
 - Section 8 – Promoting healthy and safe communities
 - Section 9 – Promoting sustainable transport
 - Section 11 – Making effective use of land
 - Section 12 – Achieving well-designed places
 - Section 15 – Conserving and enhancing the natural environment
- 4.3.3 The NPPF sets out the Government’s planning policies for England and puts “the presumption in favour of sustainable development” at the heart of the planning system. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.3.4 Paragraph 11 states that for decision taking this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i. the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 4.3.5 The NPPF confirms that for applications involving the provision of housing, policies are deemed to be out of date in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 4.3.6 Within this context, the housing land supply and delivery position in Horsham is set out below.

Housing Land Supply Position

- 4.3.7 Paragraph 78 of the NPPF states that local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should include the requisite buffer of 5% or 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 4.3.8 HDC's adopting housing target is contained within Policy 15 of the HDPF which states that provision is made in the HDPF for the development of at least 16,000 homes and associated infrastructure within the period 2011-2031, at an average of 800 homes per annum. However, as the HDPF is now more than 5 years old, HDC is required to calculate its local housing need in accordance with the Government's standard methodology – currently (as of December 2025) 1,338 new homes per annum and an uplift of over 67%.
- 4.3.9 HDC's five-year land supply position was most recently confirmed in the Council's Annual Monitoring Report 2024-2025 (published in December 2025), in which it was concluded that HDC was able to demonstrate a supply of **1.7 years** (34%).

Housing Delivery

- 4.3.10 NPPF Paragraph 79 states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local

planning authority's housing requirement over the previous three years, the following policy consequences should apply:

1. Where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
 2. Where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of the framework, in addition to the requirement for an action plan.
 3. Where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, in addition to the requirements for an action plan and 20% buffer.
- 4.3.11 The most recent Housing Delivery Test results were published by the Department for Levelling Up, Housing and Communities in December 2024 and show that RDC achieved **62% delivery**, meaning that **the presumption in favour of sustainable development applies along with the requisite 20% buffer**.

Shaping Development in Horsham District: Planning Advice Note

- 4.3.12 The Council has published the 'Shaping Development in Horsham District Planning Advice Note' (SDPAN) to guide new development that comes forward under the presumption in favour of sustainable development.
- 4.3.13 The Note does not form part of the Development Plan, however, it comprises guidance that should be considered in the preparation of planning applications and it is a material consideration for Horsham District Council as the decision-making authority ahead of the adoption of the emerging Local Plan. The Note accepts that increased flexibility will be required to accommodate housing development before the new Local Plan is adopted, including the consideration of sites that are located outside defined built-up area boundaries.

4.4 EMERGING POLICIES

Emerging Horsham District Local Plan 2023-2040 (Regulation 19)

- 4.4.1 Horsham District Council has been in the process of preparing a new Local Plan for some time. The Regulation 19 draft Local Plan was formally submitted to the Planning Inspectorate on 26th July 2024 for Examination. On 7th April 2025, the Inspector published a Letter formally recommending the Local Plan to be withdrawn from Examination. The recommendation followed concerns relating to

the Council's proposed housing target, Duty to Cooperate and uncertainties over water neutrality.

4.4.2 In late 2025, it was agreed that the Examination would proceed following the Government's intention to remove the Duty to Cooperate and the Council's willingness to explore a higher level of growth. On 5th May 2026, the Inspector published a Post Hearing Letter setting out their interim conclusions and action points for the Council. The note can be summarised as follows:

- Local Housing Need for Horsham District is concluded to be 14,071 homes over the plan period. In addition to this figure, it was agreed that the Plan would seek to accommodate half of Crawley's unmet housing need to 2040 (some 3,757 dwellings), with the remainder accommodated in Mid Sussex, taking the total requirement for Horsham to 17,828. On top of the figure of 17,828 dwellings, the plan's housing requirement will accommodate a 'realistic and reasonable evidence-based' allowance for the south coast's unmet housing need. The Council are liaising with Mid Sussex who are developing a methodology for assessing what an appropriate allowance might be. This work will enable a final figure for the housing requirement to be produced.
- The submitted Plan falls short of meeting local housing need and does not contain any allowance for unmet need from neighbouring authorities. The Council will therefore need to identify further housing sites for inclusion in the plan in the interests of soundness. A pragmatic approach will be taken to the design of the stepped trajectory to ensure that there is a good prospect that a 5 year housing land supply can be maintained throughout the plan period.

4.4.3 There continues to be uncertainty regarding the status of the emerging Local Plan and timescales up to adoption.

Draft NPPF (December 2025)

4.4.4 The Government has recently consulted on a revised version of the NPPF which includes a series of national design-making policies that, in some cases, indicate how much weight the Government would expect a particular consideration to be given, including cases where it is appropriate to give substantial weight to certain benefits, and the limited circumstances in which it is expected that permission would be refused.

4.4.5 The revised NPPF is due to be published in Summer 2026 and may coincide with the determination of this Application; therefore, it should be given some consideration in the determination of this Application.

4.4.6 Of particular relevance are the proposed revisions to policies concerning the presumption in favour of sustainable development. Draft Policy S5: Principle of Development Outside Settlements identifies situations where developments can be approved outside of settlements. Notably, this includes (emphasis added):

- 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 [inter alia]:*
- i. *be well related to an existing settlement²⁹ (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.*

²⁹ Where a development proposal is located outside a settlement, and separated from the existing built-up area by virtue of being beyond the outside edge of an allocated site that has yet to be fully developed, consideration should be given to whether the proposal is in a suitable location should the allocated development not proceed.

5 PRE-APPLICATION DISCUSSIONS AND PUBLIC CONSULTATIONS

5.1 POLICY BACKGROUND

- 5.1.1 The Government is committed to early engagement and the NPPF emphasises the benefits of pre-application consultation to help improve the efficiency and effectiveness of the development management system for all parties. Good quality pre-application discussions enable better coordination between public and private resources and improved outcomes for the community (Paragraph 40).
- 5.1.2 The NPPF continues to confirm that both Local Planning Authorities and statutory consultees have a key role to play in pre-application discussions to ensure a proactive and approach to the consideration of key issues at pre-application stage (Paragraphs 41 and 42).

5.2 PRE-APPLICATION ADVICE

- 5.2.1 As encouraged by the NPPF, this Application is submitted following pre-application discussions with Officers at Horsham District Council. A pre-application meeting was held on 26th September 2025, which was followed by written advice issued under reference PE/25/0181 on 7th October 2025.
- 5.2.2 The scheme presented as part of the pre-application enquiry was for a smaller development proposed on the western parcel of the Site, with the intention to expand the development across the remainder of the Site once water neutrality limitations had been resolved.
- 5.2.3 The comments received on the initial proposal are summarised below:
- Due to the Site's location outside of the settlement boundary, the proposed development would conflict with the spatial policies contained within the HDPF. It was acknowledged, however, that the district's inability to show a five-year housing land supply means that the tilted balance would apply and the principle of development could be supported if the benefits of development at the Site outweigh the harms.
 - The Council recognises that it is likely to receive applications outside of defined settlement boundaries and on unallocated sites within this context. It will consider positively applications that meet the requirements of the Shaping Development in Horsham PAN. It was concluded that the Site adjoins the settlement edge of Cowfold and would be appropriate in scale to the scale and function of Cowfold as a 'medium' village. The lack of a masterplan for whole Site at the time was raised as a concern.

- The Cowfold Neighbourhood Plan does not include policies that seek to manage development outside of the defined built-up area boundary, therefore paragraph 14 would not be engaged. The CNP also includes policies on design, residential development principles and car parking provision which any application should have due regard to.
- Comments were made on housing mix and affordable housing requirements.
- The Officer commented that limited information was given on the design and character of the dwellings. Officers stressed the need for locally distinctive architecture, referencing features along A281 such as chimneys, gable ends, brick and tile detailing. Please refer to **Section 6.4** for illustrative details on materiality and design. Final details will be agreed at reserved matters stage.
- Comments were made on impact of the access on the oak tree to the north of the existing entrance. Please refer to **Section 6.7** for details on trees.
- Some concerns were raised over the landscape impact. The Site sits within a “low-moderate” capacity landscape area, and any application would require a Landscape Visual Appraisal. A master-planned approach, including setting aside areas of open space and planting, would be expected to reduce harm. Please refer to the Landscape and Visual Appraisal submitted with this Application. The report is summarised in **Section 6.5**, of this Statement.
- Any application would need to clearly describe the impact of the setting of the nearby listed buildings and how any harm will be mitigated. Please refer to **Section 6.8** of this Statement.
- Mitigation against the amenity of the neighbouring dwellings to the west would need to be assessed. Please refer to **Section 6.4** of this Statement.
- A Flood Risk Assessment would be required. This report is submitted with the Application and is summarised in **Section 6.6**.
- Environmental Health advised that an odour assessment, noise assessment, air quality assessment and Phase 1 contamination survey will be required. These reports are submitted with the Application and are summarised in **Section 6.9**.

5.2.4 The comments have been duly considered and incorporated into the illustrative plans that have been submitted. Following the removal of water neutrality restrictions in late 2025, the proposed development now includes both field parcels which takes a more holistic approach to establishing an appropriate southern edge to the village.

5.3 PUBLIC CONSULTATION

- 5.3.1 A public exhibition event was held on 16th April 2026, running from 16:30 to 19:00 at the Cowfold Village Hall. The exhibition was attended by 28 local people and the feedback received can be summarised as follows:

COMMENTS	RESPONSE
Concerns over capacity of local services e.g. doctors' surgery. The local primary school was noted to have very low attendance.	The local primary school – St Peters C of E Primary School – is located on Station Road, Cowfold. Government data³⁰ indicates that, as of May 2026, there is capacity for 140 pupils and only 94 pupils currently enrolled (67%). Funding for schools is heavily reliant on headcount, meaning that schools with fewer pupils can be allocated less funding (which often has an unfortunate impact on more rural schools). The introduction of additional family homes within the area will increase pupil numbers and may have a positive impact on funding for St Peters, in tandem with other development around the village. NHS data³¹ indicates that the Cowfold Surgery is currently accepting new patients.
Neighbourhood Plan has been made and contains provision for local housing need.	Please refer to Section 6.2 (paragraphs 6.2.8 onward) for discussion on the status of the Neighbourhood Plan.
Request for ecological impacts to be suitably considered, including a request for swift bricks and hedgehog highway.	Please refer to the submitted Preliminary Ecological Appraisal and Biodiversity Net Gain Report, which are summarised in Section 6.7 .
Queries on the management of flood risk and drainage design.	The submitted Flood Risk Assessment and Outline Drainage Strategy is summarised in Section 6.6 .
Queries on proposed housing mix. Smaller units were welcomed.	The housing mix for the development is a reserved matter; however the illustrative layout includes a range of homes including smaller 1-3 bedroom homes.
Queries on affordable housing provision.	The proposed development includes a policy compliant level of affordable housing.

³⁰ [St Peter's CofE \(Aided\) Primary School Government Data](#)

³¹ [Cowfold Surgery Government Data](#)

COMMENTS	RESPONSE
Queries on boundary treatments.	Boundary treatments will be agreed at reserved matters and condition stage but are expected to be appropriate for this edge of village location, with frontages appropriate to the use of adjacent land.
Comment on the closure of the skate park.	It is understood that the Skate Park, which is found approximately 540m to the north of the site in the recreation ground, has been closed over concerns about its condition. It is understood that the Parish Council is exploring options for its future replacement. CIL monies generated by this development could potentially be put towards a future proposal.
Comment on the need for an odour assessment.	The submitted Odour Assessment is summarised in Section 6.9 .

TABLE 5: RESPONSES TO PUBLIC CONSULTATION COMMENTS

6 PLANNING CONSIDERATIONS

6.1 INTRODUCTION

- 6.1.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is necessary to consider whether the Application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.
- 6.1.2 In determining whether the proposal accords with the Development Plan, the following planning considerations are assessed in this Section in relation to the proposal:
- Principle of Development
 - Illustrative Design and Layout
 - Affordable Housing Statement
 - Transport and Accessibility
 - Flood Risk and Drainage
 - Landscaping, Trees, Ecology and Biodiversity Net Gain
 - Other Matters: Air Quality, Archaeology, Energy and Sustainability, Contamination, Lighting, Noise, Odour and Utilities

6.2 PRINCIPLE OF DEVELOPMENT

- 6.2.1 As outlined in the preceding sections of this Statement, the Site is currently outside of the defined built-up area of Cowfold or any defined allocation; meaning it is viewed as part of the countryside and would, as a starting point, conflict with the adopted spatial strategy contained in the HDPF which seeks to direct new housing development to within settlement boundaries (Policy 3) and to allocated sites that adjoin a settlement edge (Policy 4).
- 6.2.2 However, the currently adopted HDPF is in excess of 5 years old and sets out a spatial strategy to meet housing needs identified over 10 years ago. It is for this reason that paragraph 34 of the NPPF sets out a requirement that Local Plans to be reviewed every 5 years, to take account of any changes in circumstances, including changes in national planning policy and significant changes in the Local Housing Need figure, such as is the case for this Application.

- 6.2.3 The Council has been working towards adopting a new Local Plan which is currently subject to Examination. However as of May 2026, considerable work will be required to identify additional housing land to meet the district's needs and the unmet needs of Crawley and coastal authorities. This is despite the recent changes to Duty to Cooperate and the removal of water neutrality restrictions that had caused lengthy delays to plan-making and decision-taking over the past 5 years. For this reason, there is currently no immediate prospect of a new Local Plan being adopted and it is clear that there remains a demonstrable need for additional housing.
- 6.2.4 At present, the Council can currently demonstrate a 1.7-year land supply, out of the required 5-year supply, with a delivery rate of 62% of their identified housing need, using the latest Housing Delivery Test result (December 2024). The consequence of this is that the built-up area boundary must also be acknowledged to be out of date and it is necessary for the Council to consider the development of sustainable sites that have not been formally allocated as part of the now out-of-date development plan.
- 6.2.5 Within this context, paragraph 11d of the NPPF states that permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 6.2.6 Areas or assets of particular importance includes habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding or coastal change.
- 6.2.7 Accordingly, it is necessary for this Application to consider whether the adverse impacts of development would significantly and demonstrably outweigh the benefits and any potential impacts on areas or assets of particular importance. This position was confirmed in pre-application discussions, in which the Officer acknowledged that the tilted balance would apply where the benefits outweigh any potential harm the development could cause.

Implications of NPPF Paragraph 14

- 6.2.8 Paragraph 14 of the NPPF states that the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- the neighbourhood plan contains policies and allocations to meet its identified housing requirement.

6.2.9 The Cowfold Neighbourhood Plan was formally made in October 2025. However, the Neighbourhood Plan is underpinned by a 7-year-old Housing Need Consideration report published in May 2019, which does not provide an up-to-date assessment of local housing need and was published at a time when HDC still had an up-to-date development plan.

6.2.10 The report provides an assessment of need based on 7 different methodologies. Methods 1 to 3 rely on national statistics however the use of national statistics has frequently been criticised and ultimately led to a revised standard method being introduced in December 2024. In the Government's consultation on proposed changes to the NPPF and the standard method, the following comments were made:

"The use of household projections in the current standard method has attracted criticism from across the sector. Household projections are volatile, and subject to change every few years, making it difficult for local planning authorities to plan for housing over their Plan periods (10-15 years). To guard against regular shifts, the previous government opted to lock in 2014-projections, rather than updating the formula to incorporate more recent updates. This means the dataset is now ten years old and is no longer fit for purpose in reflecting current housing needs. By projecting forward past trends, household projections have also resulted in artificially low projections in some places, particularly where overcrowding and concealed households have suppressed household formation, which generally happens in the least affordable parts of the country."

6.2.11 It is clear therefore that Methods 1 to 3 are inconsistent with current national guidance for calculating housing need and should therefore be considered out of date.

6.2.12 Method 4 refers to the Strategic Housing Market Assessment and the 'Housing Need in Horsham District' report published in 2014 and 2015, respectively, and derives a 'fair share' figure based on an objectively assessed need which is now over 10 years old. The emerging Local Plan will need to account for the current objectively assessed need of 1,338 homes per annum to meet the district's needs alone, which has increased by over 100% from the figures used in Method 4. Method 4 is therefore considered out of date.

6.2.13 Methods 5A, 5B, 6 and 7 rely on population projections and/or policy projections based on the currently adopted HDPF, which as noted above are now out of date.

6.2.14 Paragraph 14(b) of the NPPF makes specific reference to paragraphs 69-70 in determining the identified housing requirement which state that:

- Paragraph 69 - strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.
 - Paragraph 70 - where it is not possible to provide a requirement figure for a neighbourhood area (including but not limited to instances where strategic policies for housing are out of date), the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.
- 6.2.15 It is clear that there has been a significant change in circumstances that has affected local requirements. Indeed the Neighbourhood Plan Examiner's report considered the potential for this change in circumstances occurring down the line. The Examiner stated, amongst other thing, that: *"I am satisfied that the approach taken, including the two sites selected as allocations, would not prevent other sites coming forward in the future if the need for further residential development in the parish is identified in the emerging Local Plan."*
- 6.2.16 The Parish Council have recognised that the emerging Local Plan may result in a different Housing Need number than provided for in the Neighbourhood Plan and made a commitment to an early review. Accordingly, it can be concluded that Paragraph 14(b) does not apply and therefore Paragraph 14 is not engaged.
- 6.2.17 The same conclusion was made in the determination of the Horsham Golf Club appeal (reference APP/Z3825/W/24/3355546) whereby the paragraph 14(a) was concluded to be engaged; however the Inspector considered the housing need methodology in the relevant Neighbourhood Plan to be out of date as the need would be nearly 3 times the figures identified in the Neighbourhood Plan if calculated today. In any case, it was concluded that the planning balance was so heavily skewed in favour of the development that any conflict with paragraph 14 and the NP would be outweighed.
- 6.2.18 It was also confirmed during pre-application discussions that paragraph 14 would not be engaged for this development.

General Alignment with the Spatial Strategy

- 6.2.19 The Site's location outside the built-up area boundary means in policy terms the Site is located within the countryside, where Policy 4 and Policy 26 will apply.
- 6.2.20 **Policy 26** of the HDPF states that the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any

development must be essential to its countryside location and meet one of the following criteria:

- Support the needs of agriculture or forestry
- Enable the extraction of minerals or disposal of waste
- Provide for quiet informal recreational use
- Enable the sustainable development of rural areas.

6.2.21 In light of the considerable and demonstrable need for housing, the proposed development is considered to meet criteria 4. In the absence of a five-year land supply or an in-date local plan – and in light of the recent comments from the Inspector regarding the need to identify additional sites – development in the countryside will be essential and it is necessary for the Council to consider the sustainable development of rural areas under the tilted balance.

6.2.22 In addition to these requirements, Policy 26 states that proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, with reference to a number of specific considerations. These are assessed in **Table 6** below.

CRITERIA	COMPLIANCE
1 <i>The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;</i>	The development will extend the settlement boundary of Cowfold, through infilling a section of undeveloped land between two areas of built-form associated with the dwellings on Henfield Road and the wastewater treatment works. Therefore, continuing the development pattern of Cowfold. Given that the Site sits directly adjacent to the built-up area boundary of Cowfold the built form to the north, east and west means that the Site does not exhibit the typical characteristics of countryside areas, notably tranquillity and rural character. The landscape becomes more rural beyond the southern boundary. The Site is located 375m south of the Cowfold Conservation Area, however given the separation from the Site and the screening provided by intervening development, it is unlikely the Site will have any impacts on the historic character of the conservation area. Future reserved matters applications will take into consideration the heritage character of Cowfold. The ecological qualities are discussed further in Section 6.7.
2 <i>The pattern of woodlands, fields, hedgerows, trees,</i>	As per the illustrative plan, the existing boundary trees and vegetation will be maintained. A minor area of vegetation will

CRITERIA	COMPLIANCE
<i>waterbodies and other features; and</i>	be removed to allow space for the access route to the western portion of the Site.
3 <i>The landform of the area.</i>	This is a reserved matter, however, the illustrative plan carefully considers the topography in the development, locating the attenuation basins at the lowest point at the south of the Site, harnessing the existing drains along the southern boundary of the Site.

TABLE 6: COMPLIANCE WITH HDPF POLICY 26

- 6.2.23 It is recognised that the proposed development will result in some conflict with Policy 26, being new-build residential development which would not have necessitated a rural location at the time of the HDPF's adoption. However taking into account the current planning context in Horsham, it can be demonstrated that the proposal will align with the general requirements of Policy 26.

Shaping Development in Horsham District: Planning Advice Note

- 6.2.24 The Council has published the 'Shaping Development in Horsham District Planning Advice Note' (SDPAN) to guide new development that comes forward under the presumption in favour of sustainable development. The Note does not form part of the development plan, however, it is a material consideration for the determination of applications ahead of the adoption of the emerging Local Plan.
- 6.2.25 The SDPAN accepts that increased flexibility will be required to accommodate housing development before the new Local Plan is adopted, including the consideration of sites that are located outside defined built-up area boundaries.
- 6.2.26 It is notable that the SDPAN reflects the general requirements of **Policy 4: Settlement Expansion**, which sets out the circumstances in which the expansion of settlements will be supported. These requirements are the same as those outlined in the SDPAN, save for *1) the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge*. This requirement is not considered relevant given the titled balance currently in effect.
- 6.2.27 The requirements of the SDPAN are set out in **Table 7** below.

CRITERIA	COMPLIANCE
<i>The site adjoins the existing settlement edge as defined by the built-up area boundary</i>	The Site is located adjacent to the southern boundary of Cowfold.
<i>The level of expansion is appropriate to the scale and function of the settlement the proposal relates to</i>	The Site is located adjacent to the boundary of Cowfold, a predominantly residential area. The land to the north and west of the Site is in residential use, therefore further residential

	development on the Site would be appropriate in function to this part of the village.
	A scheme of a similar scale was approved to the north of Cowfold (DC/22/1815). The quantum of development was considered appropriate for the setting of Cowfold.
<i>The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services</i>	As previously discussed in this Section, at present Horsham is only able to demonstrate a 1.1-year supply of deliverable housing and given the recent updates on the emerging Local Plan, there is a clear and demonstrable need for housing across the district.
<i>The impact of the development individually or cumulatively does not prejudice comprehensive long-term development</i>	The development of this Site would not prejudice comprehensive long-term development of adjoining land. In response to feedback during pre-application discussions, and in light of the removal of water neutrality restrictions, the development now includes both land parcels which provides an opportunity for comprehensive masterplan as an appropriate bookend to the southern extent of the village.
<i>The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced</i>	The proposed development would be located within existing strong, vegetative boundaries, being enclosed by treelines to the north, south and east. The landscape features are to be maintained and enhanced as part of the application.

TABLE 7: COMPLIANCE WITH THE SHAPING DEVELOPMENT IN HORSHAM CRITERIA

Locational Sustainability

- 6.2.28 In light of the SDPAN and the tilted balance, it is recognised that unallocated sites will need to be identified to deliver current local housing needs and therefore sites will need to be considered that do not currently fall within the built-up area boundary.
- 6.2.29 The Site is located alongside Cowfold village, a settlement categorised as a 'medium village' in Policy 3 of the HDPF. These settlements have a 'moderate level of services and facilities and community networks, together with some access to public transport ...'
- 6.2.30 The Site is in walking distance from a range of services, employment opportunities and amenities in the village which can be accessed via the existing footways that exist along Henfield Road leading north from the existing access and to the commercial estate further south. The Site is also located in proximity to nearby modes of sustainable transport to access services further afield. The Site offers a choice of transport modes to new residents who will not be entirely reliant only on the private car. Indeed, the NPPF states in paragraph 83 that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Where there are groups of

smaller settlements, development in one village may support services in a village nearby.

- 6.2.31 The adopted boundary of the settlement captures the built-up area to the west of the Site, meaning that the southern extent of the proposed development would be no further south than locations where the principle of new development would be accepted within the village extent. This includes the residential dwellings on Summer Meadow permitted under reference DC/17/2352, which were concluded to be within a sustainable location close to local facilities and services. Overall, the development site is not considered to be any less accessible than other dwellings located within the village.

Conclusions on the Principle of Development

- 6.2.32 It has been demonstrated that the principle of development of approximately 40 dwellings at the Site should be acceptable, given that:
- The district is unable to deliver a 5-year supply of housing, falling considerably short at 1.7 years. The housing need evidence underpinning the Neighbourhood Plan is considered out-of-date, meaning further housing is required to meet locally identified needs. The presumption in favour of sustainable development is therefore engaged.
 - In the absence of up-to-date housing policies, it is demonstrated that the development remains in broad alignment with the adopted spatial strategy, being a site adjoining a settlement with a moderate level of services and facilities. The proposed development aligns with the requirements of the SDPAN document produced by Horsham to guide new development in advance of the new Local Plan.
 - The Site is sustainably located and benefits from infrastructure which supports travel by means other than the private car.

6.3 AFFORDABLE HOUSING STATEMENT AND HOUSING MIX

- 6.3.1 **Policy 16** of the HDPF states that housing sites providing 15 or more dwellings, or on sites over 0.5 hectares, will require to provide 35% affordable housing. The proposed development will meet these requirements, proposing 14 affordable dwellings of approximately 40 dwellings proposed. The remaining 26 dwellings will be provided as open-market houses.
- 6.3.2 A tenure-blind design approach will ensure that both affordable and market homes are indistinguishable in their external quality and character.
- 6.3.3 **Neighbourhood Plan Policy 13** states that development proposals, which includes a mix of dwellings, types and sizes as indicated in the latest housing needs survey,

will be supported. The CNP reflects the need for a wide mix of housing from starter homes to larger family homes to facilitate both downsizing for older residents and upsizing as families grow. As of summer 2025, the Housing Register for Cowfold currently has 179 households in need of affordable accommodation of varying sizes.

- 6.3.4 The housing mix is a reserved matter; however the final mix will take into account the latest affordable housing needs of the District and Cowfold at the time of submission, ensuring compliance with Policy 16 of the HDPF as well Policy 13 of the CNP. The tenure mix is also reserved, however, in line with the advice provided at pre-application stage, the illustrative layout provides for 70% affordable rent and 30% other affordable products (shared ownership).

- 6.3.1 The indicative tenure mix is shown in **Table 8** below.

TENURE					
	1-bed	2-bed	3-bed	4-bed	Total
Affordable rented	2	6	2	0	10 (25%)
Shared ownership	1	0	3	0	4 (10%)
Open market	0	3	17	6	26 (65%)
Total dwellings	3	9	22	6	40

TABLE 8: INDICATIVE TENURE MIX

6.4 INDICATIVE LAYOUT AND DESIGN CONSIDERATIONS

- 6.4.1 **Policy 32** of the HDPF states that good design is a key element in sustainable development and seeks to ensure that development promotes a high standard of urban design, architecture and landscape. While design and layout are reserved matters, the submitted Illustrative Plan provides a framework for a suitable future site layout, as illustrated in the DAS, to ensure that it is appropriate to its edge-of-settlement context and respects key landscape features and constraints.
- 6.4.2 The Illustrative Plan submitted with the Application defines the main development parcels within the Site, which are reflective of the constraints and opportunities identified through various technical studies undertaken. Notably, the boundary and central vegetation on the Site have been largely retained as an important landscape feature, helping to soften the appearance of the development and offering recreational opportunities for existing and future residents to enjoy as part of the open space strategy. This complies with **Neighbourhood Plan Policy**

5 which requires a mix of high quality formal and informal open space in new development.

- 6.4.3 The southern strip of the Site will not be developed; given the topography of the Site meaning this area of land is most appropriate for attenuation basins forming part of the wider landscaping strategy. This also allows the large tree in the centre of the south of the Site to be retained as a landscaping feature and the retention of a landscaped buffer between the development parcels and the countryside beyond.
- 6.4.4 In accordance with the advice received at pre-application stage, the development can be sensitively designed to reflect the mixed palette of materials found in the village, including red brick, white painted brick, clay hanging tiles, black weatherboarding and brown or red roof tiles.
- 6.4.5 Matters of appearance of the new dwellings is a reserved matter and any future application will demonstrate compliance with Policy 32 of the HDPF and Policy 5 and 9 of the CNP.

Housing Size and Density

- 6.4.6 As per **Policy 16** of the HDPF, developments should provide a mix of housing sizes and types, where an appropriate mix of different housing types and sizes for each Site will depend upon the established character and density of the neighbourhood.
- 6.4.7 The building heights proposed will ensure the dwellings respond to the different topographies of the Site, as well as the character of Cowfold. The dwellings proposed will be a mix of 1.5 and 2-storey dwellings; this is reflective of the prevailing buildings heights in Cowfold. The 1.5-storey dwellings will be situated on higher ground to reduce the visual prominence of the development, while the 2-storey dwellings will be used to define key frontages of the Site and create a sense of enclosure, where necessary.
- 6.4.8 The proposed density of the scheme is considered appropriate within its surrounding context, reflecting its position at the edge of the settlement. The proposed arrangement of built development, together with areas of open space, will provide a well-defined and logical transition to the countryside, creating a clear and natural edge to the settlement boundary.
- 6.4.9 The proposed density of the development is cognisant of the prevailing grain of the settlement and the need to reflect the transition into the countryside, in line with **Policy 33**. The development of approximately 40 homes is considered acceptable in principle and is capable of providing a sensitive extension to Cowfold.
- 6.4.10 In this regard, the proposals are considered to accord with Policy 32 and 33 of the HDPF and NPPF Paragraph 135 by reflecting the local context in such a way that is in keeping with the local area and delivers an attractive place to live. A more

detailed assessment of these policies will be carried out at reserved matters stage, in reflection of the detailed scheme.

Impact on Local Amenity

- 6.4.11 The layout of the development is a reserved matter, however the indicative layout plan has been developed to ensure that the neighbouring dwellings to the west of the site are not negatively impacted by the development. The proposed dwellings on the western edge are set back from the boundary, with private gardens proposed separating them from the existing dwellings. Where existing vegetation is found along the western boundary, this will be retained to further create screening.
- 6.4.12 Further, the proposed dwelling heights will be in keeping with the surrounding area. This along with the set back from the eastern boundary means the development would not result in overlooking to the dwellings to the east.

Landscape Impact

- 6.4.13 **Policy 25** states that landscape character of the district, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.
- 6.4.14 A Landscape and Visual Impact Assessment (LVIA) has been prepared by Landscape Management Services and is submitted with this Application to demonstrate that the development is appropriate to this edge-of-settlement location.
- 6.4.15 The LVA concludes that the Site reflects limited key characteristics of the Low Weald, as described in the published NCA for the Low Weald. Given the enclosure and neighbouring residential development on Henfield Road and South Leas, the Site is more characteristic of a settlement edge character, rather than rural character.
- 6.4.16 The LVA confirms that the most important features from a landscape, ecological and arboricultural perspective to be protected are the boundary hedges and trees, with the mature oaks in the central part of the Site being considered most notable. The illustrative layout plan demonstrates how these features can be retained to maintain the sense of enclosure into the Site.
- 6.4.17 The Site is currently made up of small irregular fields, enclosed by mature vegetation; meaning the addition of any built form will impact the character of the Site. However, the assessment concludes that the change of use from an equestrian field to a residential development would have 'predominantly negligible localised effects' on the landscape character. Particularly, given that the majority of the hedges and trees will be retained.

- 6.4.18 Views into the Site are limited, with only limited glimpses or partial views through hedge and tree cover from two notable footpaths (COW1775 and COW1780) into the Site, which would be entirely screened during summer months.
- 6.4.19 In landscape terms, the Site forms a logical extension to Cowfold as the infilling of land between the settlement area to the west and the wastewater treatment works and allotments to the east, while benefiting from the natural landscape features to the south which offer physical and visual screening from the more open countryside and within the Site's boundary to soften the appearance of new built form. The landscape harm of developing a greenfield Site is therefore localised and modest, with the harm expected to reduce over time as the landscaping scheme develops and the development assimilates into its surroundings.
- 6.4.20 Of note is the recent appeal for the Horsham Golf Club (Appeal Reference APP/Z3825/W/24/3355546 relating to application DC/23/1178), for the development of up to 800 dwellings south of, but separate to, Horsham. The Inspector notes that 'As the Council fairly accepted, greenfield sites outside settlement boundaries (and therefore in the countryside) will need to come forward in Horsham district if housing needs are to be met. Consequently, a degree of landscape harm, coalescence and conflict with Policies 25, 26 and 27 will have to be tolerated.'
- 6.4.21 As noted by the NPPF, small and medium scale sites make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly; thereby helping to manage growth for the borough in a more efficient and sustainable manner.

Settlement Coalescence

- 6.4.22 **Policy 27** states that landscapes will be protected from development which would result in the coalescence of settlements. Development will be resisted unless it can be demonstrated that (inter alia):
- There is no significant reduction in the openness and 'break' between settlements.
 - It does not generate urbanising effects within the settlement gap, including artificial lighting, development along key road corridors, and traffic movements.
 - Proposals contribute to the conservation, enhancement and amenity of the countryside, including where appropriate enhancements to the Green Infrastructure network or provide opportunities for quiet informal recreation.

- 6.4.23 The nearest defined settlement to the south is Partridge Green which lies almost 3km away to the south west. The proposal will result in the extension of Cowfold to the south, but no further than the existing southern extent of the village (the boundary of which runs along the western edge of the Site). As a result, there will be no reduction in the break between the settlements and, in light of the well-established natural screening to the south, no reduction in perceived openness.
- 6.4.24 As with any greenfield development, the proposals will have an unavoidable impact on the character of Site; however, the impact will be almost entirely contained within the boundary of the Site and would be viewed within the context of the village.
- 6.4.25 The proposed development has sought to conserve important landscape features as part of the illustrative layout and will provide opportunities for quiet informal recreation.

6.5 TRANSPORT AND ACCESSIBILITY

- 6.5.1 To demonstrate compliance with **Policy 40**, a Transport Statement (TS) and Framework Travel Plan (FTP) have been submitted alongside this Application; the TS includes a high-level Highways Impact Assessment.
- 6.5.2 The detail of vehicular access is sought in full as part of this outline Application. The design of the access point has been developed through pre-application discussions with the Highways Authority, and informed by Neo Transport, as transport consultants for the scheme. This ensures alignment with Paragraph 109 of the NPPF which requires transport issues to be considered at the earliest stages of development proposals.
- 6.5.3 The Site is set to have one primary vehicle access point which will take the form of a simple priority junction from the A281 (Henfield Road). This will formalise the existing access point located to the northwest of the Site. The access has been designed to be 5.5m wide with a kerb radius of 6m to accommodate a refuse vehicle entering into and egressing from the Site. The access design has ensured compliance to relevant road safety standards.
- 6.5.4 The development is anticipated to generate a trip rate of 21 and 18 two-way vehicular trips during the morning and afternoon peaks respectively. The TS states that these rates are unlikely to have severe impacts on the surrounding local highway. This is demonstrated further in the high-level Highway Impact Assessment, as requested by WSCC in the pre-application discussions.
- 6.5.5 The high-level impact assessment of local junctions indicates that the volume of traffic associated with the proposed development would be indistinguishable from normal day-to-day variations in network conditions and, as such, would not give rise to a severe impact on local traffic.

- 6.5.6 The TS has confirmed the Site is sustainably located, with good pedestrian and cycle connectivity to nearby amenities. Further, the Site is well-located for commuting opportunities further afield, including access to the City of London. The FTP submitted alongside this Application proposes measures and initiatives to promote sustainable travel, securing initiatives and incentives which would minimise the need to travel by private car. A full Travel Plan will be submitted at reserved matters stage.
- 6.5.7 The TS further assesses the Personal Injury Collision data, concluding that there are no identifiable highway safety issues which would be expected to be exacerbated by the proposed development.
- 6.5.8 The TS therefore indicates the proposed development is in compliance with Policy 40: Sustainable Transport of the HDPF; given the proposed development is unlikely to cause significant impact on the local transport network; provides safe vehicular, cycle and pedestrian access; and is sustainably located. This further aligns with Paragraph 115 and 117 of the NPPF.
- 6.5.9 In summary, the TS concluded that the proposed development should be considered acceptable on highway-related grounds.

Car and Cycle Parking

- 6.5.10 Although parking is not a consideration at this stage, the illustrative masterplan has been designed to accommodate suitable parking provision in line with the West Sussex County Council's Guidance on Parking at New Developments (2020).
- 6.5.11 A full assessment of **Policy 41** and CNP **Policy 16** will be provided at reserved matters stage.

6.6 FLOOD RISK AND DRAINAGE

- 6.6.1 GTA Civils and Transport Ltd has carried out a Flood Risk Assessment (FRA) to support this Application. This has been prepared to demonstrate compliance with Policy 38: Flooding of the HDPF and Policy 1: Groundwater and Surface-water Flood Risk of the CNP.
- 6.6.2 The FRA highlights that risk of fluvial flooding to the development is low, given that the majority of the Site is located within Flood Zone 1. An area of Flood Zone 2 and 3 is found on the southern boundary however is contained within the ditch corridor, meaning it does not impact the proposed footprint of the development.

Surface Water Flood Risk and the Sequential Approach

- 6.6.3 The majority of the Site is at very low risk of surface water flooding; however a localised surface water flow route crosses the Site from north to south in the 1 in 1000 year scenario (and partially in the 1-in-100 year scenario). This strip has a hazard rating of no higher than 0.75 (very low – ‘caution’).
- 6.6.4 The sequential approach to flood risk management is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding.
- 6.6.5 The PPG was updated in September 2025 to state that in applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.
- 6.6.6 The Application is submitted in outline form, with the layout and exact location of the plots to be agreed at reserved matters stage. The submitted FRA demonstrates that the very low risk of surface water flooding in the 1-in-100 and 100 year scenarios can be suitably managed through the proposed drainage strategy, which will ensure that the development of 40 homes can be accommodated on Site. The entire development will fall within in Flood Zone 1.

Indicative Drainage Strategy

- 6.6.7 The indicative drainage strategy will comprise two open basins located adjacent to the southern boundary of the Site; these will discharge into the existing ditch watercourse running along the southern boundary and will accommodate the 1-in-100-year plus 45% change rainfall event. Surface water runoff will be restricted to the 1 in 2 AEP greenfield rate of 4.9 l/s/ha.
- 6.6.8 The proposed basins form part of the illustrative landscaping strategy and add interest points for recreational benefits and opportunities for biodiversity. The strategy would also form multi-stage treatment train, which is demonstrated to sufficiently protect the receiving water environment from TSS, metals and hydrocarbons using
- 6.6.9 Foul water flows will be pumped via an on-site pumping station, connected to the Southern Water sewer network.

- 6.6.10 The FRA ensures that the proposed development will not increase flood risk through incorporating sustainable urban drainage systems (SUDS); this complies with Policy 39: Flooding of the HDPF and Policy 1 of the CNP; and aligns with the requirements of Chapter 14 of the NPPF.

6.7 ECOLOGY, TREES, AND BIODIVERSITY NET GAIN

- 6.7.1 **Policy 31** states that development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss and ensures that the ecosystem services of the area are retained.
- 6.7.2 Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.

Trees

- 6.7.3 This Application is accompanied by an Arboricultural Impact Assessment and Method Statement (including Tree Survey) prepared by Ramsay & Co, who have been advising the design team on the illustrative layout from the outset. The aspiration has been to avoid impacts on the existing trees (and their root protection areas) wherever possible. This includes location and shape of the proposed drainage basins in the southern part of the Site.
- 6.7.4 The illustrative layout would require the removal of the following trees:
- SG05 – mixed small trees / shrubs of low (Category C) quality to upgrade the access from Henfield Road.
 - H09 – partial removal of ornamental evergreen hedgerow of low (Category C) quality to upgrade the access from Henfield Road.
 - SG17 – partial removal of blackthorn of moderate (Category B) quality to create the access through to the eastern parcel.
 - SG28 – partial removal of ‘scrubby willow and popular’ of low (Category C) quality to parking bays in the western part of the Site.
- 6.7.5 T06, T11, T16 and T21 which require new surfacing within the root protection area extent. All excavations will be undertaken by hand with manual tools under arboricultural supervision.

- 6.7.6 T06 is subject to a TPO (TPO/0762) and has a root protection area which extends over an existing residential access. The proposed development access has been designed to ensure the widening of the entrance encroaches as little as possible into the designated tree root protection area. Appropriate retaining mechanisms will be used, informed by arboricultural advice, to reduce any potential impact within the RPA.

Ecology

- 6.7.7 A Preliminary Ecological Assessment (PEA) has been prepared by Animal Ecology and Wildlife Consultants (AEWC). The PEA presents an assessment of the likely significant effects of the proposals with regard to ecology and is based on an ecological survey carried out on the Site on 28th January 2026.
- 6.7.8 The PEA describes the Site as comprising predominantly intensively grazed modified grassland of limited biodiversity value; with higher ecological value boundary features including scrubs, native hedgerows, trees and the adjacent watercourse.
- 6.7.9 The native hedgerows found within the Site are considered priority habitat which will be retained and protected where possible. The indicative layout plan requires some clearance of the hedgerows to accommodate the primary access route. At reserved matter stage, the Application will ensure the priority habitat lost will be replaced on-site, ensuring compliance with **Policy 25** of the HDPF.
- 6.7.10 The PEA also provides a habitat evaluation for the protected species and species of conservation concern. Notably:
- Badger: No badger setts were identified on-site and no evidence of badger activity was observed on or directly adjacent to the Site. Further, it is considered unlikely that badger setts are present within 30m of the Site's boundary.
 - Bats: Two timber field shelters are present on the Site and both were assessed as having negligible potential for bats due to a complete absence of any potential roosting features.
 - Bats: The hedgerows in the Site may be used by commuting bats, while the trees, scrub, watercourse and on-site pond would provide foraging opportunities. The central fields are of low suitability for foraging and commuting bats.
 - Breeding birds: Suitable habitat is found on the Site for breeding birds, including the boundary vegetation, and the two timber field shelters. Further, four bird boxes are found on the oak trees on the Site. Breeding birds are therefore considered likely to be present during the breeding season. The fields are not considered suitable for ground-nesting birds.

- Barn owls: The field shelters provide suitable access for barn owls, however lack beams for perching or roosting. No evidence of barn owl activity was recorded.
 - Great Crested Newts (GCN): The Site does have some potential to support terrestrial GCN. The pond on the Site was also assessed and given low suitability for breeding GCN.
 - Hazel dormice: The hedgerows and dense scrub provide suitability for hazel dormouse. Suitability is reduced in places due to grazing pressure, which has resulted in sparse and low-level vegetation in parts of the scrub.
 - Reptiles: The Site was considered to have some suitability to support common reptile species; notably in the boundary features.
 - Otters: No evidence of otter activity was recorded during the walkover survey. Some limited suitability is found for otters in the watercourse immediately adjacent to the Site, but this suitability is considered low.
 - Water voles: The adjacent watercourse has limited suitability for water voles.
- 6.7.11 The PEA further provides mitigation measures to reduce any potential impact the construction of the proposed development, as well as the occupation of the development, would have on these species. Details are expected to be agreed at reserved matters and condition stage.
- 6.7.12 With regard to the above, it is considered that the proposed development is in accordance with **Policy 31** of the HDPF and the NPPF.

Ecology and Lighting

- 6.7.13 The illustrative layout has been informed by advice from AEWC who have recommended keeping the eastern and southern boundaries, as well as the central line of vegetation, dark. This has been considered in the design evolution of the scheme, with these areas proposed to be retained and enhanced.
- 6.7.14 The Applicant is committed to ensuring that future lighting design is appropriate to the Site's location and habitats present. The following measures are likely to be put forward at reserved matters stage:
- Dark buffers, illuminance limits and zonation.
 - Careful consideration of the design of the light and fittings, whereby the spread of light will need to be minimised to ensure that only the task area is lit. This includes the use of flat cut-off lanterns or accessories which will shield or direct light to where it is required.

- The height of the columns will be considered.
- Consider the opportunity for no-lighting solutions where possible, incorporated white lining, good signage and LED cats' eyes.
- Glazing treatments should be restricted or designed in coordination with the ecologists and lighting professionals to determine any effects on ecological areas.

6.7.15 Any future reserved matters applications will include a full Lighting Assessment to balance the ecological requirements as well as the standards for lighting. Lighting will be designed in accordance with the Bat Conservation Trust's Guidance Note (08/23) on bats and artificial lighting at night.

Biodiversity Net Gain

- 6.7.16 For developments in England, Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). As a result of this, applicants must deliver a BNG of 10%, ensuring that developments will result in more or better quality natural habitat than there was prior to the development.
- 6.7.17 As a result of this, a BNG Assessment has been prepared and submitted as part of the Application. The BNG Assessment provides an assessment and calculation of biodiversity units pre- and post-development in the context of the mitigation hierarchy.
- 6.7.18 Retaining the existing landscaping features have been considered from the outset, with landscape design being developed with input from the ecology team. As a result, a significant proportion of the Site will be given over to high-quality habitats for recreational open space. The indicative proposal results in a 23.876% net gain for area habitats, 30.48% for hedgerow units, and 14.94% increase in watercourse units³². This exceeds the minimum target of 10% BNG, but the final BNG results will be confirmed at reserved matters stage and through the discharge of the mandatory BNG condition.
- 6.7.19 A Habitat Management and Monitoring Plan will be prepared post decision to ensure that the maximum ecological benefits are realised on a long term and that the predicted increase in the BNG of the site is delivered. The HMMP will follow the recommended HMMP template published by Natural England, contained at **Appendix A**.

³² To note, the watercourse units were generated through a River Condition Assessment Report, submitted as part of this application.

- 6.7.20 In view of the above, it is considered that the development as proposed is in accordance with all relevant National and Local Policy relating to landscaping, trees, ecology, and Biodiversity Net Gain.

6.8 HERITAGE AND ARCHAEOLOGY

Heritage Statement

- 6.8.1 **Policy 34** of the HDPF recognises that heritage assets are an irreplaceable resource, and as such should be sustained and enhanced through positive management of development affecting heritage assets.
- 6.8.2 Paragraph 207 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.8.3 The Site is approximately 65m to the east of Grade II listed Wood Grange, with the Grade II listed Bulls House located beyond. The built form along Henfield Road to the east of the Site has altered the immediate setting of these assets and creates a visual barrier between the buildings and the development proposed. This, along with intervening vegetation and a sloped land form, means that the proposed development would not be visible from the buildings (ground or first floor level) and therefore there would be no immediate impact on the building's setting. The previously rural setting of the Bulls House is now best experience from the fields immediately adjacent to its southern boundary.
- 6.8.4 The Site is located 375m south of the Cowfold Conservation Area. The Cowfold Conservation Area Appraisal and Management Plan (March 2026) states that character of the Conservation Area is influenced by the landscape and development that surrounds it. The character of this landscape fringe is identified in the report as the rural landscape immediately west of the village and the recreational land immediately east. The landscape fringe to the west of the village lies some 250m to the north west.
- 6.8.5 The report also notes that due to the nature of the land form surrounding Cowfold there are limited long distance views into the Conservation Area. This is the case for the Application Site. The significant boundary vegetation to the north of the Site as well as the intervening built form, creates a visual and physical separation between the Conservation Area and the Site. Therefore, the proposed development is not considered to impact the character or immediate setting of the Conservation Area.
- 6.8.6 The proposed development looks to reflect the wider character of Cowfold, through using similar building heights, styles and materials. This will ensure the

development integrates with the surrounding area, thus maintaining the setting of Cowfold and ensure the development is legible to Cowfold. Details will be agreed at the reserved matters stage.

Archaeology

- 6.8.7 An Archaeological Desk-Based Assessment has been carried out by Orion to identify the archaeological potential of the Site.
- 6.8.8 The Assessment analyses the information available within the West Sussex Historic Environment Record and historic mapping and documentary research. This information indicates that the Site has low potential for archaeological remains dating to all periods.
- 6.8.9 The groundworks associated with the construction of the proposed development have the potential to impact upon any previously unrecorded archaeological deposits. This can be mitigated against in advance of and during the construction through a geophysical survey which is expected to be agreed via condition. The results of this survey would confirm any further mitigation measures that may be required.

6.9 OTHER MATTERS

- 6.9.1 **Policy 24** (Environmental Protection) states that developments will be expected to minimise exposure to and the emission of pollutants including noise, odour and air. This Application is accompanied by a number of technical reports to demonstrate compliance with this policy and these are summarised below.

Air Quality

- 6.9.2 An Air Quality Assessment (AQA) has been produced by Phlorum and is submitted as part of this Application. The report assesses the potential impacts of construction works and operational stage traffic on local air quality.
- 6.9.3 The main likely effects on local air quality during construction relates to dust. The construction phase of the proposed development was considered as medium risk in the AQA. A range of measures to mitigate these impacts are suggested in the AQA, which would result in a negligible residual significance of impact for the construction phase.
- 6.9.4 The operation of the proposed development was also assessed. The report concluded that it would have an insignificant impact upon local air quality.
- 6.9.5 The AQA concludes therefore that, provided a suitable mitigation package is provided, air quality should not pose any significant obstacles to the planning

process and it is expected that these measures would be agreed via condition. This ensures the proposed development is compliant with NPPF Paragraph 187, 198 and 199, as well as Policy 24: Environmental Protection of the HDPF.

Odour

- 6.9.6 Given the Site's location adjacent to a Treatment Works, an Odour Assessment has been produced by Phlorum and is submitted as part of this Application. The Assessment included three odour surveys being carried out between 25th July and 25th September 2025.
- 6.9.7 Only one strong and brief odour associated with the Treatment Works was detected across the application site during the three sniff tests, 30m from the boundary of the Treatment Works. Apart from this, all detected odours were barely perceptible and very infrequent. An Illustrative Layout has demonstrated that residential areas can be designed to be well distanced from this corner.
- 6.9.8 The onsite survey and odour dispersion modelling assessment show that the proposed development is compliant with the requirements of Paragraph 200 of the NPPF, Policy 24 of the HDPF; therefore, odour should not be a constraint to the development.

Noise

- 6.9.9 Acoustic South East have carried out an Acoustic Assessment to support the planning Application. The Assessment used several Class 2 meters to assess the Site's soundscape, particularly the noise generated by Henfield Road (A281), the Clark Lifting Site and the Waste Water Treatment Works.
- 6.9.10 The noise from Henfield Road (A281) was considered the dominant noise source which has the potential to impact amenity within the Site. The impact of this is reduced, however, due to the intervening properties along Henfield Road, creating a buffer to the traffic noise.
- 6.9.11 Further, the Waste Water Treatment Works would provide a continual sound source changing very little from daytime to nighttime. The indicative layout plan means a buffer area of vegetation is found at the northeast of the Site separating the dwellings from the Treatment Works.
- 6.9.12 Where some noise impact is found, suitable mitigation measures are proposed. It was found that applying standard thermal double glazing and 2 trickle vents, achieves sufficient sound reduction to protect future occupants from daytime and night time soundscapes, as well as maximum noise events generated from Henfield Road (A281).

- 6.9.13 Specific detailing of acoustic mitigation measures are a reserved matter, however future developments will ensure compliance with the findings of the Acoustic Assessment and the relevant guidelines.

Contamination

- 6.9.14 A Phase 1 desk study has been carried out to identify any potential sources of contamination at the Site. This includes a conceptual site model, which identifies any potential sources of contamination, together with the risk of each potential pollutant. These are as follows:
- Minor vehicle activity: Very low risk
 - Sewage farm (off-site): Low risk
 - Garage on western boundary (off-site) and former filling station to the northwest: Very low risk
- 6.9.15 The study further comments that where there may have been some use of organic herbicides and/ or pesticides, given their short half-lives, any residual contamination will have dispersed within 5-10 years.
- 6.9.16 The Site is underlain by the Weald Clay Formation, an unproductive stratum, meaning there is unlikely to be any significant groundwater flow within the aquiclude. The Site's location on the Weald Clay Formation does mean the Site is at low risk of presence on shrinkable soils.

The study concludes that no potential sources of contamination of significance have been identified on the Site. Some very low to low risk contaminants are located within the immediate vicinity of the Site; these will require some specific and targeted investigation. These will need to be considered at reserved matters stage.

Minerals

- 6.9.17 The Site is located within a mineral safeguarding area for brick clay, as identified by the WSCC's West Sussex Joint Minerals Local Plan (adopted July 2018)(MLP). Therefore, a Minerals Safeguarding Assessment has been carried out by Geo-Environmental Services Limited and submitted alongside this Application. This was carried out to ensure the proposed development would be compliant with Policy M9, Safeguarding Minerals of the West Sussex MLP.
- 6.9.18 It was concluded that due to adjacent sensitive land uses, mineral extraction would be constrained at the Site. Therefore, prior extraction would not be feasible at the Site.

- 6.9.19 Further, through consultation with local operators, it was concluded that the Site does not currently represent a commercially viable source of extraction.
- 6.9.20 The potential for incidental extraction as a part of the development Site was reviewed, however was concluded that this would only generate a small volume of low-quality material.
- 6.9.21 The Assessment did note that the incidental use of won soils could remove the requirement to import specific fill materials. This is, however, a reserved matter detail.

Energy and Sustainability and Utilities

- 6.9.22 To demonstrate compliance with Policy 35: Strategic Policy Climate Change and Policy 36: Strategic Policy Appropriate Energy Use, the proposed development has incorporated sustainability into its design approach.
- 6.9.23 The commitments to sustainable development to be incorporated include the Be Lean, Be Clean and Be Green objectives, as listed in Policy 36. The key design choices to achieve these objectives are outlined in the DAS. Any future reserved matters applications will ensure compliance with these objectives.

Utilities Statement

- 6.9.24 Utilities are expected to be provided within roadways and pathways to be approved at Reserved Matters stage. There are no existing utilities within the Site.

7 SUSTAINABILITY AND THE TILTED BALANCE

7.1 SUSTAINABILITY

- 7.1.1 The NPPF, (paragraph 8) provides the Government's overarching objectives for achieving 'sustainable development', which includes economic, social and environmental objectives. The proposals contribute to sustainable development through the following overarching sustainability objectives:

Economic Objective:

- The development would have a short term positive economic impact due to the employment opportunities which would be created with its construction including supply of materials and skilled labour. The development of this scheme has the potential to draw upon local labour.
- Additional spending is also likely to occur in the local area as construction contractors and workers purchase goods and services from local providers over the construction period. The provision of additional housing will also result in the increased use of local shops and services, which in turn will support indirect jobs in the supply chain.
- Household expenditure generated by future residents will also help to support economic activity locally, including businesses providing household goods and services, transport service providers and the leisure industry. Increased household expenditure will flow to the retail and food and accommodation businesses present in the locality, helping to sustain the jobs and services which these facilities provide into the future. Household expenditure will also be captured by businesses further afield.
- The new dwellings will result in increased council tax income for the local authority, the New Homes Bonus, and monies secured through Community Infrastructure Levy (CIL) for the market homes. The increase in headcount for the local primary school may also have a positive influence on funding.

A Social Objective

- The proposals include a moderate number of new market and affordable homes in a location where there are well recorded issues with affordability and slow delivery.
- The new residents within the development will form part of the community in Cowfold, enhancing and expanding community networks.

- The proposal includes areas of amenity space which will help to support community cohesion, establish a sense of place and aid with natural surveillance.

An Environmental Objective

- The Applicant's ecologist has provided input to the design team throughout the design process to ensure that the development layout reflects the measures required to avoid, mitigate or compensate for ecological impacts as well as other measures designed to provide long-term ecological enhancements. This includes retaining the key ecological corridors in the Site, notably the southern boundary and central north-south hedge line.
- The proposals will also provide several areas of informal amenity space which provide ample opportunity for biodiversity enhancements, resulting in a greater than 10% net gain for biodiversity. The majority of the Site is currently used as grazing land which considerably reduces opportunities for wildlife within the Site.

7.2 PLANNING BALANCE

- 7.2.1 As established throughout this Statement, the development as proposed under this Application will represent a sustainable and appropriate form of development within the immediately vicinity of Cowfold. It represents a logical extension to the village, which infills land between the southern extent of the village and the built form located at the nearby waste water treatment works. The proposal would not be viewed as an obvious extension into the countryside, by virtue of the strong boundary features and the form of the village which runs southwards along the Site's western boundary.
- 7.2.2 The Horsham District Planning Framework is out-of-date. The Council cannot demonstrate, nor have any reasonable prospect of demonstrating a 5-year housing land supply within the immediate future, given recent comments made by the Inspector on the need for additional homes.
- 7.2.3 In this context, and as set out previously, the 'tilted balance' applies (NPPF Paragraph 11 (d)). For decision-taking, this means approving the Application unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Until an up-to-date Local Plan is adopted, it is only those proposals that have adverse effects markedly (i.e., "significantly") outweighing the benefits overall that would amount to unsustainable development that should not be granted.
- 7.2.4 The proposed development will increase of the supply of housing land and will deliver up to 40 no. much needed market and affordable homes. The weight to be

attributed to this additional housing is significant and directly responds to the Council's housing shortage, in the context of previous under delivery, the Council's housing supply, and the timetable for achieving a new Local Plan.

- 7.2.5 As noted within this Statement, the proposed development complies with all relevant development management policies of the adopted Development Plan. Where the proposals do not fully comply with Policies, these Policies are out-of-date and as a result attract limited weight in the planning balance. It has been demonstrated, however, that the proposal broadly aligns with the spatial strategy which seeks to direct development to the most sustainable locations.
- 7.2.6 Whilst it is acknowledged that the Site currently lies beyond established development boundaries, it is clear that the Council cannot deliver to meet its full housing need wholly within the established settlement boundaries. It is therefore clear that decision makers must look beyond these development boundaries, particularly in instances where sites are not the subject of absolute planning constraints. The development of the Site would support sustainable growth and support the vitality of an existing settlement whilst providing direct benefits to the District, without giving rise to any material adverse impacts to the character of the area, landscape, or neighbouring amenity.
- 7.2.7 In the interests of clarity, it is highlighted that there are numerous and substantial benefits that must be weighed in favour of the proposals, as set out in the **Table 9** below.

BENEFIT	WEIGHT TO BE ATTACHED
Delivery of much needed housing in a sustainable location;	Substantial weight. (NPPF Paragraph 11(d)(ii) gives this matter particular regard)
Delivery of 35% affordable housing;	Very substantial weight (NPPF Paragraph 11(d)(ii) gives this matter particular regard).
Delivery of new areas of open space which are publicly accessible;	Moderate weight.
Delivery of Biodiversity Net Gain;	Moderate weight (relating to the gains that can potentially be secured over and above the mandatory 10%).
Delivery economic benefits associated with the construction and operational phases of the development;	Some weight.

BENEFIT	WEIGHT TO BE ATTACHED
Delivery of proposals which will secure a well-design place that makes effective use of land.	Moderate weight. (NPPF Paragraph 11(d)(ii) gives this matter particular regard).

TABLE 9: PLANNING BALANCE CONSIDERATIONS

- 7.2.8 The considerations summarised below weigh against the proposed development, taking into account any mitigation measures proposed:

CONSIDERATION	WEIGHT TO BE ATTACHED
Archaeological Impacts	Limited (if archaeological remains are found, it would be moderate but this would not represent a constraint to development)
General landscape harm	Moderate weight to reflect the development of greenfield land, with the impact reducing over time and limited to Site level.
Settlement coalescence	Negligible.
Local highways	Limited
Loss of trees	TBC
Loss of hedgerows	Moderate
Pollution (air, odour and noise)	Limited (subject to mitigation measures)
Non-minerals development in a Minerals consultation area	Negligible

TABLE 10: FURTHER PLANNING BALANCE CONSIDERATIONS

- 7.2.9 Based on this assessment, it is clear that the benefits of the proposals (as listed above) significantly and demonstrably outweigh any perceived harms, it is therefore considered that Outline Planning Permission should be approved for the submitted Application without delay.

8 CONCLUSION

8.1 SUMMARY

8.1.1 This Planning and Affordable Housing Statement has been prepared by DHA Planning on behalf of Landacre Developments Ltd, in support of an Outline Application in respect of Land adjacent to Henfield Road, Cowfold.

8.1.2 The full description of development is as follows:

"Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for the main site access."

8.1.3 It has been concluded that the presumption in favour of sustainable development currently applies by virtue of a lack of five-year housing land supply in Horsham District. In such circumstances the National Planning Policy Framework states that planning permission must be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole.

8.1.4 This Statement provides a full assessment of the proposal within this context and the following conclusions can be made:

- The Site lies within the defined settlement, albeit outside of the built-up area, of Cowfold where a range of services and facilities are available and accessible by existing footway.
- The proposed development would result in a context-appropriate extension to the built-up area and would not be perceived as an inappropriate encroachment of development into the countryside or coalescence of settlements due to the existing natural boundaries. The proposal is compatible with the immediate landscape character which is heavily influenced by existing residential development, before the landscape becomes more rural to the south.
- The proposed development would contain up to 40 residential dwellings, which can be delivered quickly and efficiently to meet the need for housing in the district.
- The development will not have an adverse impact on any important heritage sites or sites of environmental significance.

- 8.1.5 For these reasons, the proposed development is deemed to be acceptable in the current planning context and will result in the sustainable development of a well-placed site close to well established community networks and services.

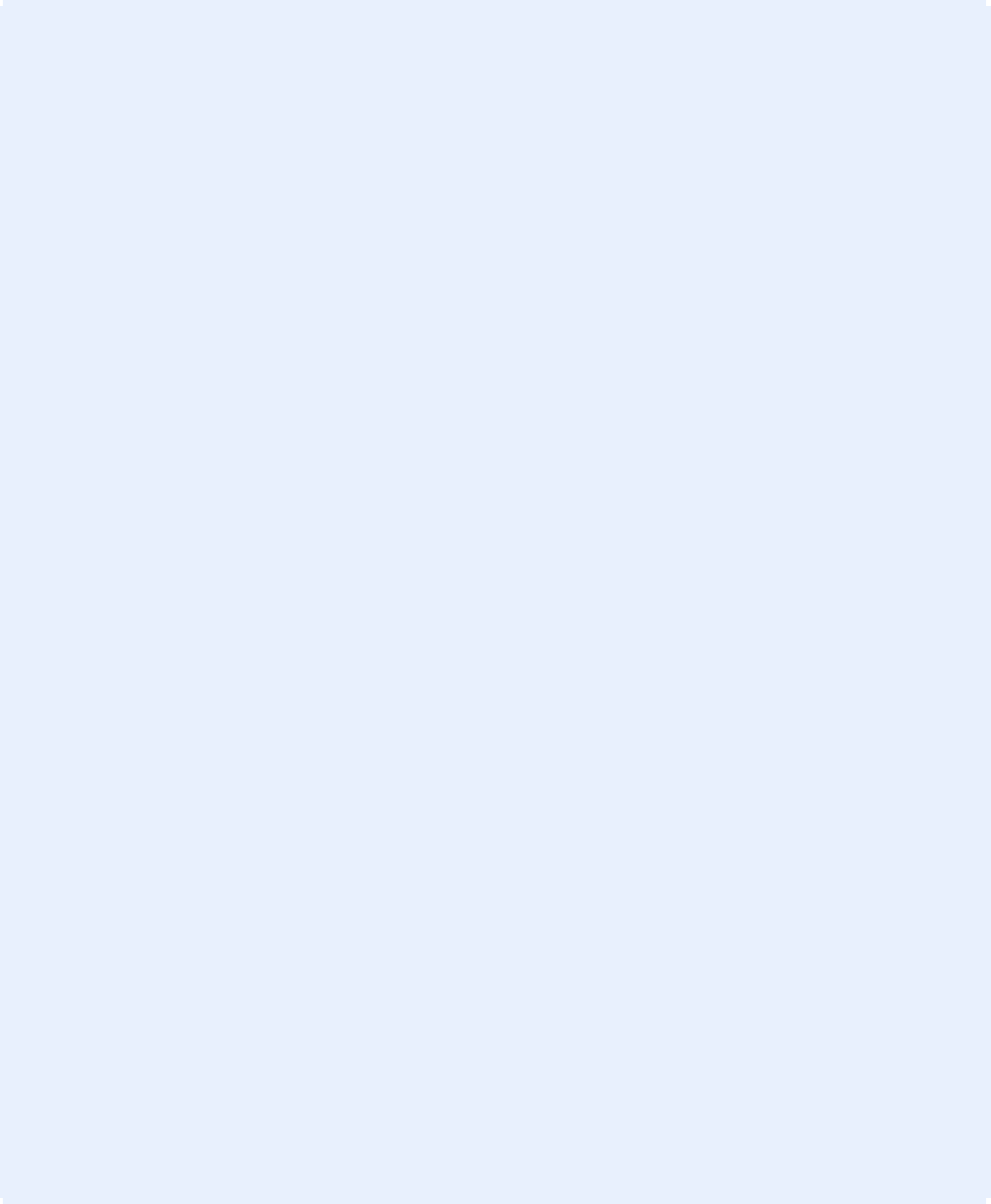
APPENDIX A: TEMPLATE HABITAT MANAGEMENT AND MONITORING PLAN

Habitat Management and Monitoring Plan

Site Name:	
Date:	Click or tap to enter a date.
Version:	

Author:

Client:



Template Document User Guide

Please delete this guidance page upon completion.

Template User Guide

You can use the Habitat Management and Monitoring Plan Template (HMMPT) for on-site or off-site biodiversity net gain projects. It is suitable for sites of varying sizes and complexity, from small and simple to large and complex. It provides a series of tables, figures and textboxes. Complete these to demonstrate how habitat creation, enhancement and management will be undertaken. Not every box will be relevant to every project. Omit those considered not relevant to your project, applying professional judgement.

Companion Document

The Companion Document contains templates for each broad habitat type used in the statutory biodiversity metric. It also assists authors in completing the 'Environmental Information', 'Creation, Enhancement and Management' and 'Monitoring' sections. To tailor the plan for your site, insert the relevant standardised forms from the Companion Document into your main HMMPT.

Site Baseline and Environmental Information

Considering the site's characteristics, choose the relevant baseline site conditions and background environmental information to include in your management plan. This is essential in informing the design of your project and shows the reviewer you have considered these in the proposals for the site. These include the proposed habitat creation and enhancement. Also, what is appropriate to include or exclude, or to point the reviewer to relevant information that has provided elsewhere as part of the application. Use the 'Baseline and Environmental Checklist PB-T01' to record relevant references, or reasons if not included.

HMMP Checklist (separate document)

This checklist is a summary of the HMMP Template headings. Author and reviewer can scan the list to check which HMMP details to include, or that have been included, in the submitted plan. You can also list and link to relevant supporting documents to accompany the templated details if

required. This helps avoid duplication of information. The reviewer can then easily check which information to expect to see in the HMMPT and which to review in an alternative linked document.

Formatting

The HMMPT format is intended as a guide. The Template uses standard Microsoft Word formatting that has not be locked for editing. You can therefore adjust it to tailor your HMMP as

required for the specific site and according to your preferences. For example, you can change text box sizes to reduce blank space in the template.

There are opportunities to provide and reference additional photographs and plans as separate appendices if required. Provide the reference number of the appropriate appendix, or location if included in a separate report, using the appropriate box within the template.

Text in grey is provided as a prompt. Replace grey text with your own words. Remember to change to black text then delete any remaining grey ‘prompt’ text.

You can delete blue text as this is for guidance purposes only.

Each text box in this HMMPT has a unique ID to assist reviewers. Do not change the reference code of any Boxes or Tables.

Supporting documents

- [HMMPT Companion Document](#)
- [Statutory Biodiversity Metric tools and guides](#)
- [Biodiversity Net Gain Guidance](#)

Using the Companion Document

The Companion Document includes additional boxes and tables that must be manually copied into this template using the copy-and-paste function. To streamline the copying and pasting process, you can minimise the heading by selecting the arrow on the left. Once the arrow is selected, when you copy, you will also copy any accompanying boxes or tables.

It is the author's responsibility to decide what additional information is appropriate to include.

Template published by Natural England.

We acknowledge the significant input from the HMMPT user-testers and production on Natural England’s behalf by FPCR Environment and Design.

Contents

1.

PROJECT BACKGROUND

5

SUMMARY OF MANAGEMENT PLAN

5

Site Boundary Plan PB-F01

6

Site Context Plan PB-F02

8

Phasing strategy

9

Roles and Responsibilities

9

Land Use Summary

11

Site Context Photos PB-F03

11

SITE BASELINE, ENVIRONMENTAL INFORMATION AND ASSOCIATED IMPACTS CHECKLIST PB-T01

13

Baseline and Environmental Information

14

2.

PLANNED MANAGEMENT ACTIVITIES

15

Principles Informed by Design Stage

15

Habitat and Condition Targets PM-T01

16

HABITAT RETENTION

17

HABITAT RETENTION PLAN PM-F01

17

Creation, Enhancement and Management Targets and Prescriptions

18

HABITAT CREATION AND MANAGEMENT – RISK REGISTER AND REMEDIAL MEASURES PM-T02

19

3.

MONITORING SCHEDULE

20

Monitoring Strategy

20

Monitoring Methods and Intervals MS-T01

20

Monitoring Reports

4

Adaptive Management

Error! Bookmark not defined.

Version Control

The version control is used for updates to the content. Record the initial version and further version control details in this table each time the management plan is altered throughout the management and monitoring period.

Version	Issue Status	Prepared by / Date	Approved by / Date

Document Details

Provide ownership, copyright and licensing information within this table.

Authorship Details

Use this box to provide relevant details of document ownership by the author, such as company address, copyright or map licence information.

9 PROJECT BACKGROUND

Summarise the key aspects of your management plan in this section. Table PB-B01 can be extended to suit the specific needs of individual projects.

Site Overview PB-B01	
Project type	On-site / off-site / mixed on-site and off-site / Habitat Bank/ Statutory Credits Project / other
Development Name and Address	N/A if habitat-bank or if not yet associated with a development
BNG Project Name and Address	If different from the development
Author Organisation	Who has written the HMMP
Landowner	Legally, the site owner
Land Manager	Person who is currently responsible for managing the site. N/A if not applicable
Responsible person/organisation for creating or enhancing the habitat	Name of organisation
Period covered by this management plan	Start/end point of 30+ year period and 5-year update (including phasing if applicable)
Planning authority	Planning authority area of the project in this plan
Planning reference (if applicable)	For any application relating to or permission granted for the BNG enhancement land
BNG register reference (if applicable)	Applicable for off-site only – N/A if using for on-site
Central OS grid reference	Central OS grid reference of the area under this HMMP
Metric revision/title	Reference Biodiversity metric used for this project ('statutory biodiversity metric' from January 2024)
Are any Irreplaceable Habitats present onsite	Yes: ☐ No: ☐

9.1 SUMMARY OF MANAGEMENT PLAN

Habitats to be Retained, Created and Enhanced PB-B02

Provide a high-level summary of the habitats to be retained, created and enhanced as part of this HMMP.

Timescales for Actions PB-B03

Summarise the key timescales for the actions covered by this HMMP.

Monitoring Requirements PB-B04

Summarise the monitoring requirements set out within this HMMP.

Required Consents and Licences PB-B05

List the relevant consents and licences required as part of this HMMP.

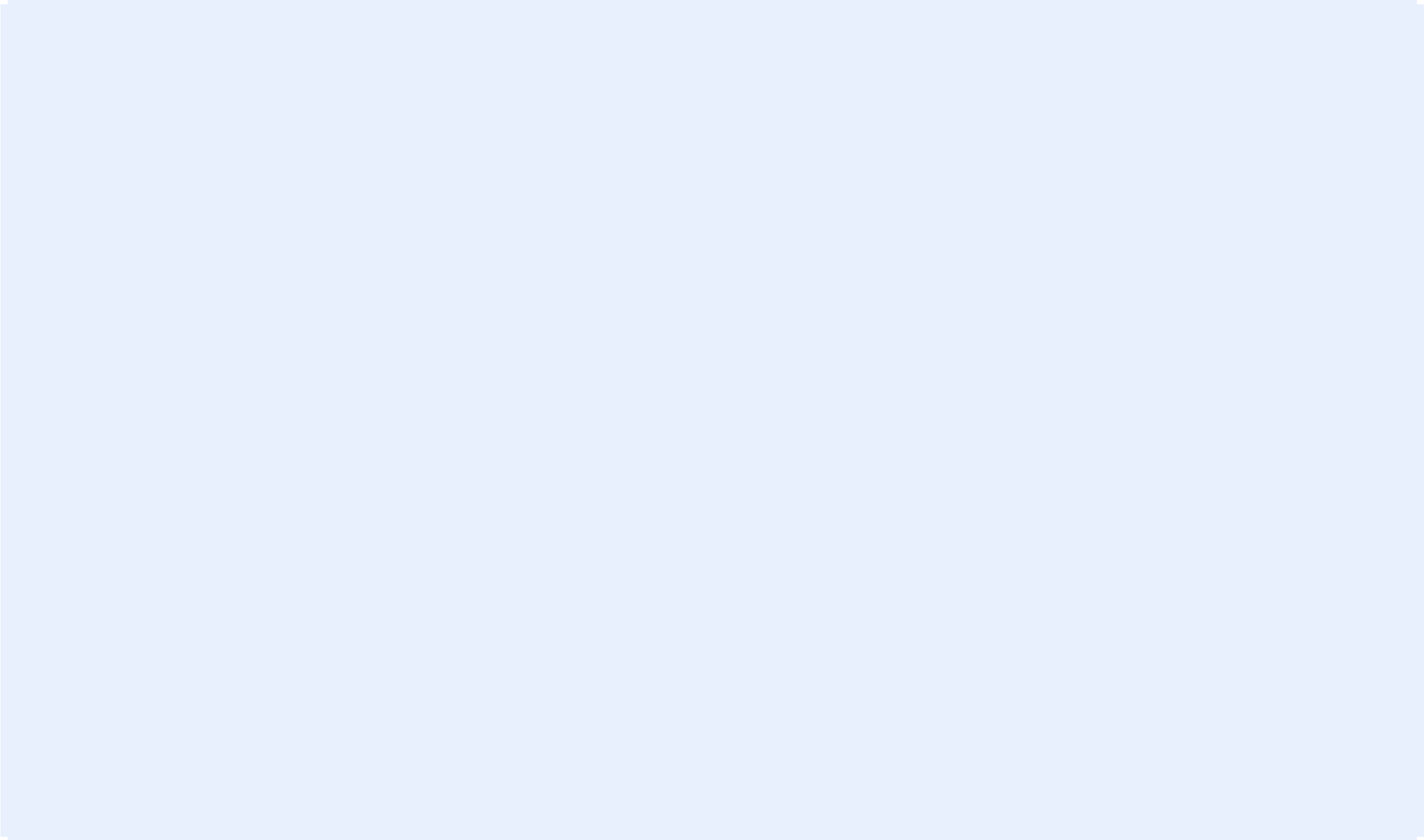
Funding PB-B06

Provide an overview of how funding has been secured to deliver the HMMP.

Legal Agreement PB-B07

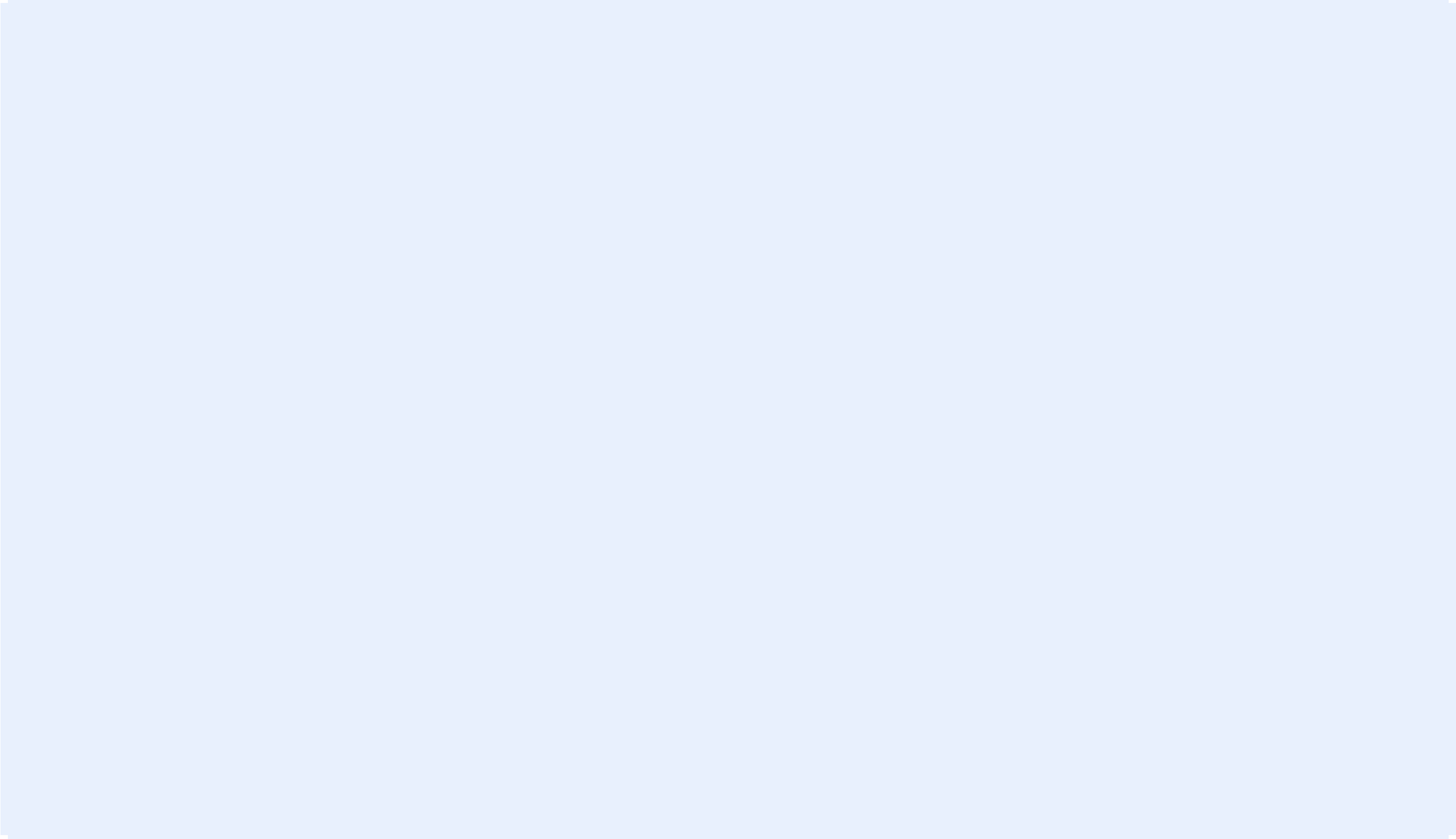
Provide an overview of any legal agreements that secure the delivery of the HMMP.

Site Boundary Plan PB-F01



Site Context Plan PB-F02

This plan should show the location of the site, including the LPA, boundary, national character area, and any relevant landscape scale policy or guidance information.



Phasing strategy

Will the proposed work measures be delivered in phases? PB-B08		Yes: ☐ No: ☐	
Provide details of how the project and any habitat creation and enhancement works and their management will be phased.			
Include details of how this will be tracked and monitored to achieve the BNG targets on the ground.			
State if this management plan covers a single phase or if it is a site wide management plan.			
If being provided for a single phase, provide a reference to a document that provides information on the overarching management plan for all phases.			

Roles and Responsibilities

Provide details of the responsible persons and organisation(s) for delivering this management plan.

Ecologist or Other Professional Responsible for HMMP PB-B09			
Name or Initials			
Organisation			
Responsibility	Start Date:		End Date:
Summarise the relevant responsibilities of the Ecologist or other professional responsible for the HMMP, both in terms of the production and implementation of this HMMP			
Statement of Competency			
A competent person is someone who can demonstrate they have acquired through training, qualifications or experience, or a combination of these, the knowledge and skills enabling that person to perform specified tasks.			

Landowner or Land Manager PB-B10			
Name or Initials			
Organisation			
Responsibility	Start Date:		End Date:
Summarise the relevant responsibilities of the landowner (or land manager if appropriate) in the production and, or, implementation of this HMMP			
Statement of Competency			
Demonstrate management and monitoring competency and, or, relevant site knowledge and skills through relevant training, qualifications or experience, or a combination of these.			
Management Organisation(s) Responsible for Implementing the HMMP PB-B11			
Name or Initials		Add N/A if works being completed by the landowner or land manager	
Organisation			
Responsibility	Start Date:		End Date:
Summarise the relevant responsibilities of the Management Organisation(s) in the production and, or, implementation of this HMMP.			
Statement of Competency			
Demonstrate the knowledge, skills and, or, experience to manage the habitats to achieve the BNG requirements, through relevant training, qualifications, experience, or combination of these.			
LPA or Responsible Body for Reviewing HMMP PB-B12			
Name or Initials			
Organisation			
Responsibility	Start Date:		End Date:

Summarise the agreed relevant responsibilities of the LPA or Responsible Body in the review, auditing and, or, long-term involvement in the implementation of this HMMP (if applicable)

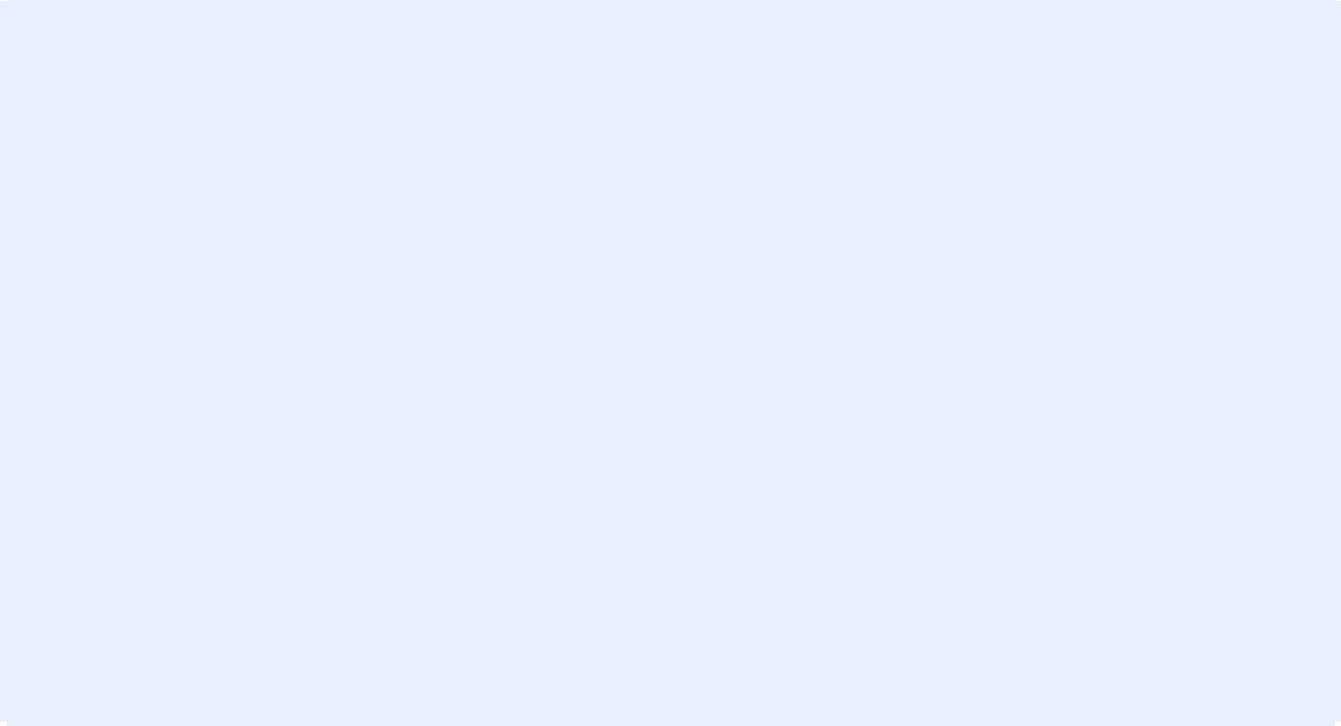
9.2

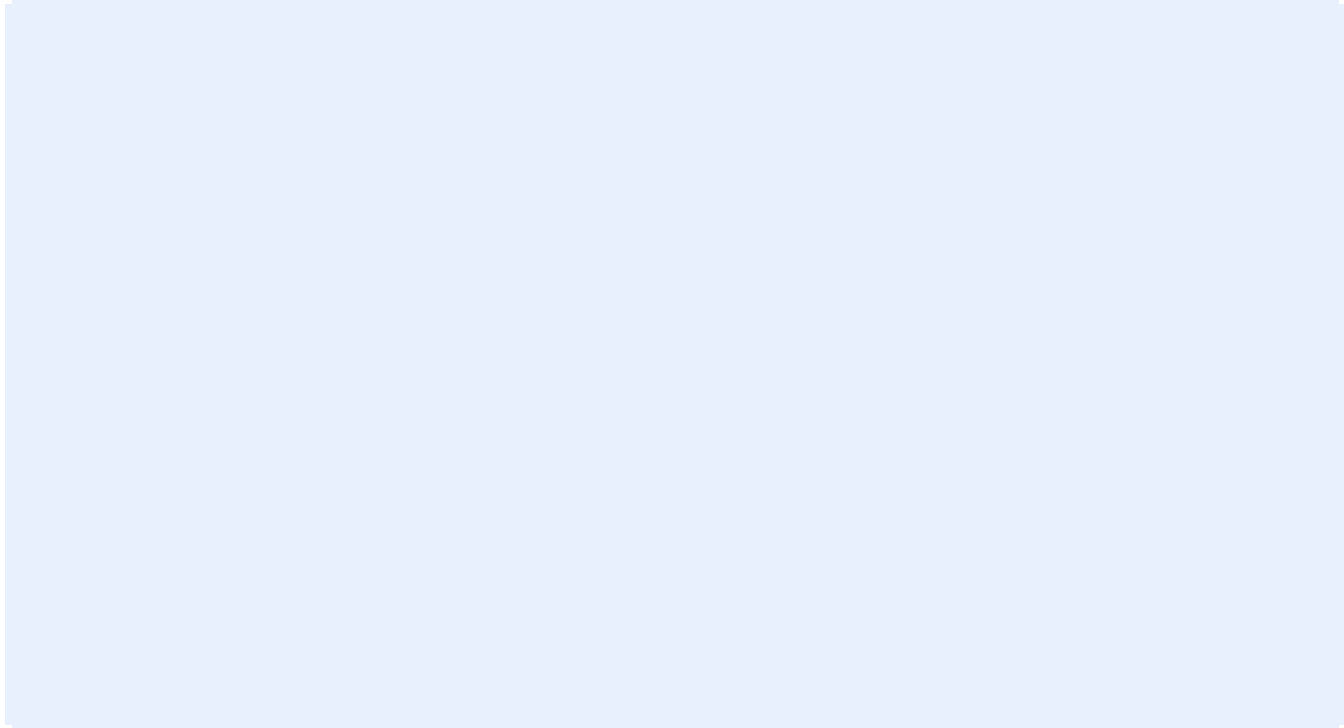
Land Use Summary

Overview of Baseline Site Use PB-B13
Provide a concise overview of the current site use including a summary of the habitats present, any specific management operations currently in effect and any other land uses. Provide the context for the management activities to assist the reviewer in understanding the changes proposed.
Overview of Proposed Site Use PB-B14
Summarise the site's anticipated uses, including proposed habitats, management regimes and intended land uses.

Site Context Photos PB-F03

Please include two overview photographs of the site in its current form here. Include additional photographs in an appendix if needed. Tick if additional photographs are provided in the Appendices ☐ Reference: [Click or tap here to enter text.](#)





9.3 SITE BASELINE, ENVIRONMENTAL INFORMATION AND ASSOCIATED IMPACTS CHECKLIST PB-T01

Consider the Baseline and Environmental Information listed below. These are likely to be appropriate factors informing your proposals and project design. They can provide the reviewer with important contextual information for the management prescriptions provided later in this document. Use your professional judgement to determine which factors are relevant to your specific project. Please use the check box to indicate which are included in your plan. For any not included, provide brief reasons why the factor is not relevant to your project using your professional judgement. Where this information is provided elsewhere, you can reference existing reports and, or, plans that have informed your decisions. For the templates for each heading see pages 3-20 of the Companion Document.

Baseline and Environmental Information	Prompts for when these may be relevant. This is not an exhaustive list. Use your professional judgement to determine which are required for your HMMP	Check box if included	Document Reference or Reason if not included
Statutory / Non-statutory Designated Sites	Will your proposals lead to direct or indirect effects on designated sites?	☐	
Protected and Notable Species	Does the presence or proximity of specific species on or near your site present any constraints or opportunities to project design or management?	☐	
Invasive Non-Native Species (INNS)	Are any INNS present onsite that could affect the proposals?	☐	
Biological Records Plan - Sites and Species	Does the presence of designated sites or specific species on or near the site present any constraints or opportunities to proposals?	☐	
Baseline Habitats Survey	Is this current and important HMMP information located in a separate document? If so, provide details on where it is located.	☐	
Public Access	Has public access, or proposals to allow public access, influenced your management prescriptions? If so, how?	☐	
Climate	Are local climate conditions and, or, climate change likely to impact the target habitat retention, creation or enhancement?	☐	
Geology and Topography	Any geological or topographical constraints or opportunities?	☐	
Agricultural Land Status	Does the site support any land favourable for agricultural management? Could this affect the proposals?	☐	
Soils and Substrates	Do soils and substrates present any constraints or opportunities?	☐	
Contaminated Land	If there is any contaminated land, will this present any constraints?	☐	
Hydrology and Drainage	Will the site hydrology present any constraints or opportunities?	☐	
Flood Risk Zones	Is the site within a flood risk zone? Will that present any site management risks?	☐	
Landscape Character and Designations	Does the landscape character of the site present any constraints or opportunities?	☐	
Historic Land Use	Does the historic land use present any constraints or opportunities?	☐	
Historic Environment and Earth Heritage	Are there any historic environment designations? What are the implications for your plan?	☐	

Other – please specify	Any other details - for example underground services or overhead powerlines, which may impact habitat management.	☐	
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Baseline and Environmental Information

See the Companion Document pages 3-20 for the baseline and environmental information insert forms. The HMMPT Companion Document contains a template for each environmental information category. Use these templates to set out how you have considered relevant constraints and opportunities as part of the design process, to promote the success of this management plan. Copy in the relevant templates from the Companion Document for each environmental information category to be included. Optional: Include these sheets at the end of your plan or as an appendix, referencing the location in Table PB-T01 above.

10 PLANNED MANAGEMENT ACTIVITIES

Provide the site-wide aims and objectives. These should consider the Project Background information section outlined above as well as the outcomes of the Metric.

Management Plan Aims and Objectives PM-B01
Set out your site-wide principles and the overarching aims and objectives that guide this HMMP. Present these clearly and concisely to assist the reviewer with understanding the overall aims and objectives. This will also provide context to the detailed information presented later in this document. Summarise how each aim and objective will be achieved within the appropriate timescale and maintained for at least 30 years. Where relevant, provide details on the project's long-term vision, including the beyond the 30 years. This may be a vision statement or similar. Provide an overview only in this box. The purpose is to explain the overarching aims of the management plan to the reviewer. Spaces are provided later in the template to provide more specific management targets prescriptions.

Principles Informed by Design Stage

The project's BNG target(s) should be set and documented early in the design process. Outline how background and baseline information influenced key design principles for the project from an early stage. This can provide useful context for the proposed retention, creation and enhancement measures.

Design Principles Informed by Baseline Information PM-B02
Summarise how the site features and baseline information influenced the site's habitat retention, creation and enhancement aspirations during the early stages of the project design. Where relevant, include details on how you reached a decision on the strategic significance of the habitat parcels present on site.

Habitat and Condition Targets PM-T01

This table presents a summary record of what you have agreed to deliver based on the biodiversity metric. These habitat condition targets form the basis of what the management plan is setting out to achieve. Include the relevant 'Area', 'Hedgerow', and 'Watercourse' types to be implemented and managed throughout the period of 30 years or more.

Baseline Habitat Type	Target Habitat Type	Parcel / Feature Refs	Baseline Condition	Targeted Condition	Years to Targeted Condition	Condition Assessment Targets	Comments
Example: Cereal crops	Other neutral grassland	1,2,3,5,8,9,10	N/A	Moderate	Standard time to target condition from the statutory biodiversity metric.	Provide the passes and fails of the metric condition assessment criteria that will be targeted for the proposed habitat target condition score. For example: Moderate condition will be targeted by achieving a pass in criteria B, C, D and E. Criterion A will not be targeted-	

Habitat and Condition Targets Further Comments

Use this section to provide further details relevant to achieving the habitat and condition targets set out above. Also, include any additional objectives that are relevant to the proposals but outside of the scope of the statutory biodiversity metric calculations.

10.1 HABITAT RETENTION

Provide a concise description of the habitats that are to be retained in their baseline condition. Habitats being retained may still require ongoing measures to maintain their baseline condition.

Measures to be Implemented to Protect Retained Habitats PM-03
Summarise the details of the habitats to be retained by the project. Use parcel references and clearly show these on the accompanying habitat retention plan. Set out how protective measures will be implemented and maintained to protect all retained habitats throughout the project. Set out any management measures that may be required to maintain or enhance their baseline condition.
Specification of Protective Measures to be Used PM-04
Use this section to provide detailed technical specifications of any protective measures (for example fencing) to be implemented.

10.2 HABITAT RETENTION PLAN PM-F01

Provide a plan with the locations of habitats to be retained (including whether to be protected and, or, enhanced) and those to be created under this HMMP. Include parcel references if needed. Tick box if any additional plans are provided in the Appendices ☐ . Reference: [Click or tap here to enter text.](#)

Creation, Enhancement and Management Targets and Prescriptions

Templates are available for Area Habitats, Hedgerows and Watercourses

See the HMMPT companion document pages 21-125 for the habitat creation, enhancement and management targets and prescription templates. The Companion Document contains a template for each habitat condition criteria as provided in the statutory biodiversity metric tool and Condition Assessments. Use these templates to set out the creation, enhancement and management targets and prescriptions for each habitat on your site.

- i) **Plan(s) page**
Page 22 includes a blank template for including a plan showing the locations of the habitat creation, enhancement and management measures to be delivered by the HMMP. You can either present a single site-wide masterplan showing the locations of all habitats to be delivered and, or, you can provide individual plans for each of the habitats to be delivered, showing only the locations of the relevant habitats. Use your professional judgement to determine whether individual plans for each habitat are required.
- ii) **Tabulated Templates**
For each habitat type provided as part of your proposals, copy and paste the relevant templates from the Companion Document into this section of the HMMPT. Use your professional judgement on how to include these. You can
 - include a single table for each different habitat type to be delivered by stating which parcels each criterion is relevant toand, or
 - use multiple versions of the same habitat template. This may be more useful if you are targeting different conditions in different parts of the site or if differing baseline conditions across your site may affect the management of certain parcels. You can provide a separate set of tables for each different condition requirement of the same habitat by re-copying the same blank template into the HMMPT.

Delete the blue text on this page before copying across sections from the Companion Document.

10.3 HABITAT CREATION AND MANAGEMENT – RISK REGISTER AND REMEDIAL MEASURES PM-T02

Provide a site-wide risk register associated with creating, enhancing and, or, managing each habitat type. Consider your approach to delivering the BNG targets in case the management prescriptions do not deliver as expected. This is a pre-emptive list. The list of potential risks should be as comprehensive as possible to provide confidence in the delivery of the management plan objectives. Complete each habitat's management targets and prescriptions first, then consider the likelihood of the risk occurring and what impacts it may have if it was to occur. Consider how these may feed back into monitoring requirements.

Risk Identification Date	Habitat Type	Risk Factor	Trigger for Action	Remedial Measure
Example: 16-08-2023	Woodland	Newly planted trees failing to establish	10% of targeted number of newly planted trees found to be dead during years 1-10.	Plant a larger number of trees initially as contingency against some losses in the early years. Undertake a second round of planting, replacing failed specimens on a like-for-like basis

11 MONITORING SCHEDULE

To deliver BNG, a robust strategy is critical to monitor successes and challenges. Routine monitoring informs progress and facilitates the required management plan updates at set intervals.

Monitoring Strategy

Provide details of the monitoring strategy to encourage successful implementation of the management plan (MS-B01)
Provide details of methods that will be used to compare the baseline habitat with the proposed retention, creation or enhancement measures. For example, this may include before-and-after photos, before-and-after surveys and species lists, etc.

Monitoring Methods and Intervals MS-T01

Provide details of the methods you will use to adequately monitor the progress towards the targets stated in the management plan and as agreed with the Local Planning Authority.
[Monitoring methods and frequency need to be considered according to habitat type. The text below is only for illustrative purposes. Plan according to your own project and habitat requirements.](#)

Habitat Type	Monitoring Methods	Monitoring Interval and Timing
Example: Other neutral grassland	To be undertaken on parcels 1, 3, 5 and 8. Undertake quadrat sampling to identify the habitat type that is establishing and then number of species per m². Estimate percentage of bare ground, bramble and bracken cover. Collect a botanical species list across grassland to check against target species list	Annually from years 1-5, then every 5 years. Surveys to be completed between May and August

Monitoring Reports

Following completion of habitat creation and initial enhancement works, prepare for your monitoring report for the Local Planning Authority or Responsible Body. You should monitor each habitat type comprising the BNG project. Provide sufficient detail for the reviewing authority to assess the progress. The 'Monitoring Report Template' can help you do this. The requirements and regularity with which the monitoring reports are required are at the discretion of the LPA or Responsible Body. Prepare the monitoring requirements below.

Monitoring Report Schedule MS-T02

Provide details of the person or organisation that will be responsible for submitting the monitoring reports. Also state the responsible organisation for receiving and reviewing the reports.

Organisation Responsible for Submitting the Monitoring Reports	Organisation Receiving and Responsible for Reviewing Reports

Provide details of when the monitoring surveys and reports will be undertaken and submitted. You can extend the table and adjust according to your required schedule.

Project Year	Month Report to be Submitted	Month Management Plan to be reviewed	Comments
Y1	September	September or October	Report on results of initial grassland and scrub creation measures.
