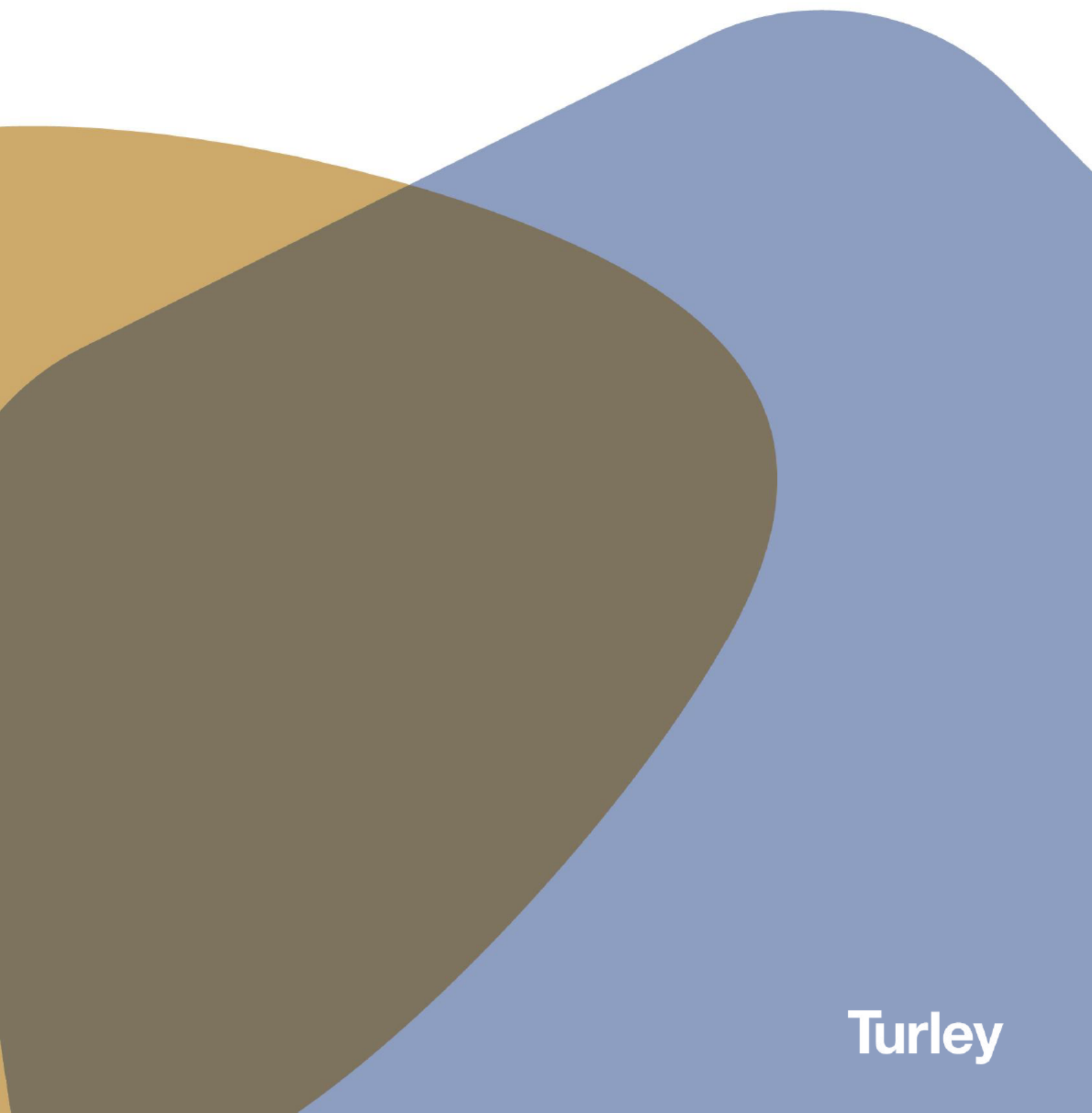


Highwood Phases 8 & 10-13

Non-Material Amendment Application

October 2026



Turley

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Client
Berkeley Group
Our reference
06040

October 2026

1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of our client, Berkeley Homes (Southern) Limited, in support of a Non-Material Amendment (NMA) to Phases 8 and 10 of the development approved under Reserved Matters (RM) application DC/15/1702, as varied by S73 permission DC/25/2015 for Land East of A24 Worthing Road, otherwise known as Highwood.

Background

- 1.2 Outline planning permission was granted in August 2010 under application reference DC/09/2138 for the following development:

Development primarily of up to 1044 dwellings including provision of employment floor space, fire station, community centre and expanded school facilities. Construction of a principal vehicular access from A24 (southbound) together with secondary bus/cycle/pedestrian accesses from Hills Farm Lane, internal highway network, diversion of existing public footpaths and a replacement footbridge over A24. Formation of associated landscape works including playing fields, allotments, recreation facilities and construction of acoustic bund/fence alongside A24 (Outline)

- 1.3 This outline was subsequently varied under DC/11/2004 in May 2012.
- 1.4 Reserved Matters for Phase 2 of the Southern parcel of the site, relating to Phases 7, 8 and 10-13, was subsequently approved in December 2016 under application reference DC/15/1702 for the following:

Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters).

- 1.5 The latest application pertaining to this consent is DC/25/2015 relating to the removal of water neutrality conditions, granted in Feb 2026.
- 1.6 Phase 7 has been built and completed and Phases 8, 10-13 of this Reserve Matters Area have yet to commence, with works ceasing on site following the completion of Phase 7.

Description of Development

- 1.7 Berkeley Homes are proposing non material minor amendments to housetypes in both Phases 8 and 10 of the Southern Parcel. The total number of units across the site would remain the same, with a reduction in the number of homes provided in Phase 8 (-5) being balanced out by and a corresponding increase in the number of homes to be provided in Phase 10 (+5).
- 1.8 The current NMA application seeks permission for the following:

Non-Material Amendment to previously approved application DC/25/2015. Amendments sought in respect of the approved houstypes and mix of approved houstypes in future phases 8 and 10 and associated conditional details.

- 1.9 Further details on the amendments sought are outlined in Section 3 of this statement. These changes were discussed during pre-application meetings with Matthew Porter (Senior Planning Officer) on 7th August and 24th September 2026.
- 1.10 The changes presented are considered to be consistent with the consented design intent and represent an improvement in terms of scheme deliverability, and viability.
- 1.11 Given the limited nature of the changes proposed in the context of the remaining 257 homes in the reserved matters area, and that there is no alteration to the overall quantum of development, it is considered that the proposed changes would be regarded as acceptable and constitute a Non-Material Amendment under Section 96a.
- 1.12 The proposed amendments would allow Berkeley to bring the rest of the unbuilt phases of the scheme forward and provide much needed housing within Horsham.

Accompanying Documentation

- 1.13 This Statement forms part of a suite of documents and drawings submitted in support of the minor material amendment. Therefore, it should be read in conjunction with the following documents:
 - Non-Material Amendment Application Form;
 - Covering Letter;
 - Planning Statement;
 - Site Plans
 - Site Layout Phase 8 – 02533_MP01 P01
 - Site Layout Phase 10 – 02533_MP02 P01
 - Site Wide Layout – 02533_MP03 P01
 - Site Phasing Plan – 02533_MP04 P01
 - Phase 8 Vehicle Track Path Analysis - 2026UK673794-WSP-CIV-XX-DR-C-2400 P02
 - Houstypes
 - 02533_SK08_Plot OP1-OP4_Floor Plans_P01
 - 02533_SK09_Plot OP1-OP4_Roof Plan_P01

- 02533_SK10_OP1-OP4_Elevations_P01
- 02533_SK11_OP1-OP4_Side Elevations_P01
- 02533_SK12_Plot OP6-OP8_Floor Plans_P01
- 02533_SK13_Plot OP6-OP8_Roof Plan_P01
- 02533_SK14_OP6-OP8_Elevations_P01
- 02533_SK15_OP6-OP8_Side Elevations_P01
- 02533_SK16_OP5_Floor Plans_P01
- 02533_SK17_OP5_Roof Plan_P01
- 02533_SK18_OP5_Elevations_P01
- 02533_SK19_OP5_Side Elevations_P01
- 02533_SK20_Plots_10.48-10.49_2.2_Floor Plans_P01
- 02533_SK21_Plots_10.48-10.49_2.2_Roof Plan_P01
- 02533_SK22_Plots_10.48-10.49_2.2_Elevations_P01
- 02533_SK23_Plots_10.48-10.49_2.2_Side Elevations_P01
- 02533_SK24_Plots_10.02-10.07 & 10.46-10.47_4.8_Floor Plans-Floor Plans_P01
- 02533_SK25_Plots_10.02-10.07 & 10.46-10.47_4.8_Roof Plan-Roof Plan_P01
- 02533_SK26_Plots_10.02-10.07 & 10.46-10.47_4.8_Elevations-Elevations_P01
- 02533_SK27_Plots_10.02-10.07 & 10.46-10.47_4.8_Side Elevations-Elevations_P01
- 02533_SK28_Plots_10.50_4.12_Floor Plans-Floor Plans_P01
- 02533_SK29_Plots_10.50_4.12_Roof Plans-Roof Plan_P01
- 02533_SK30_Plots_10.50_4.12_Elevations-Elevations_P01
- 02533_SK31_Plots_10.50_4.12_Side Elevations-Elevations_P01

- Arboricultural

- Tree Protection Plan Phase 10 - BERK25265-03

- Tree Protection Plan Phase 8 - BERK25265-03
- Tree Survey - BERK25265ts 19/08/2026
- Arboricultural Impact and Method Statement - BERK25265_aiaams 23/09/2026
- Ecology
 - Preliminary Ecological Appraisal - 554408kzm08JulyPEA_Phases_8&10-13_FV05
 - Great Crested Newt Surveys Letter - 554408sb21JulyGCN_Phases8,10-13_FV05
- Conditioned Details Amendments

Condition 3b) (To be added as an additional plan)

- Proposed Drainage Strategy Ph 8 - 2026UK673794-WSP-CIV-XX-DR-C-0500-P01

Condition 5b)

- Phase 8 Materials Schedule Rev H

Condition 7b)

- Soft Landscape General Arrangement Plan (sheet 2 of 6) D2339_L_302 Rev D
- Soft Landscape General Arrangement Plan (sheet 4 of 6) D2339_L_304 Rev D
- Soft Landscape General Arrangement Plan (sheet 5 of 6) D2339_L_305 Rev E
- Soft Landscape General Arrangement Plan (sheet 6 of 6) D2339_L_307 Rev A

Condition 14 (To be applied associated to Phase 10-13 only)

- Ecology Conditions Letter - 55440824Sep26LV2_PH8_10-13 (dated 30 September 2026)

Structure of the Planning Statement

- 1.14 This Planning Statement describes the proposed amendments and sets out why these are considered as non-material amendments. The statement is structured as follows:

Section 1: Introduction

Section 2: Site Context

Section 3: Proposed Amendments

Section 4: Planning Policy Context

Section 5: Planning Assessment

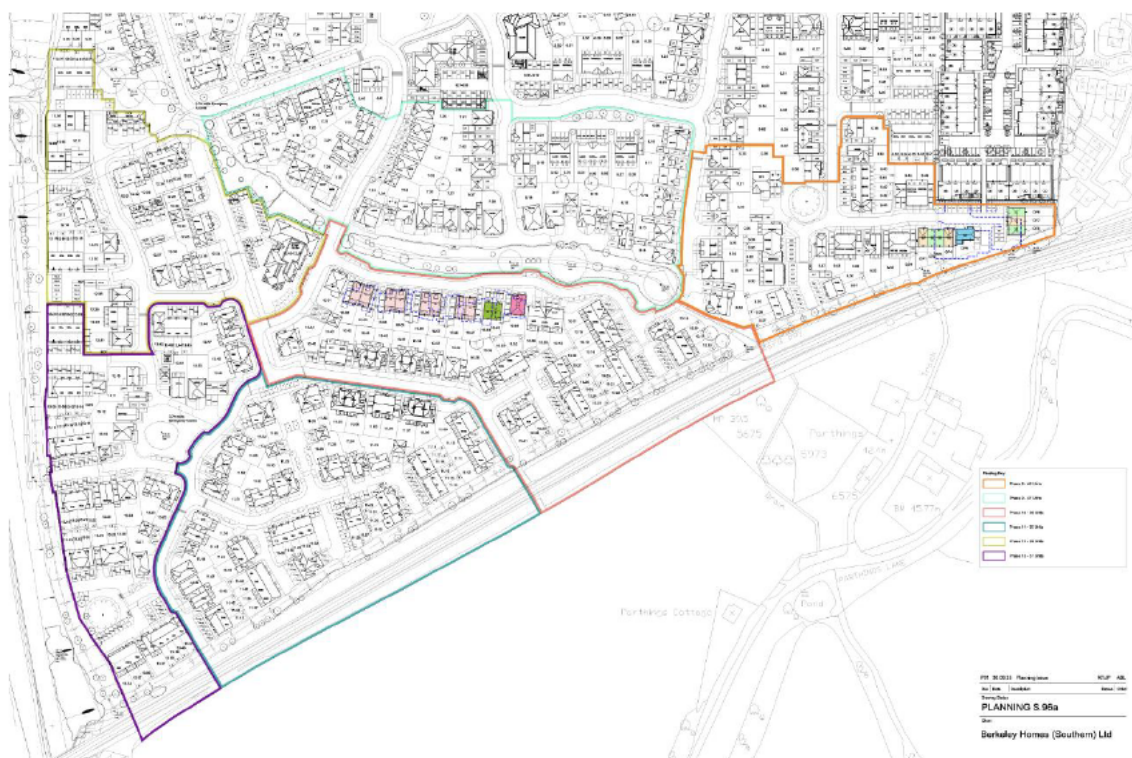
Section 6: Conclusions

2. Site Context

The Site

- 2.1 The site comprises the southernmost part of the site being developed by Berkeley to the West of Horsham and East of the A24.
- 2.2 The site is bound by the railway line to the south, an earlier phase of the wider Berkeley's housing development to the north, the A24 to the west and existing development in Horsham to the east, Windrum Close being the closest area of existing development.
- 2.3 The site is a largely flat area of grassland, rising uphill gently towards the north west corner. The boundaries are well planted along the northern boundary adjacent to the river and moderate planting along at least the northern part of the boundary with the A24. A belt of planting runs broadly in a south-easterly direction across the site with some further sporadic tree planting within the site. The boundary with the railway line to the south is largely unplanted.
- 2.4 The site comprises the final reserved matters application area for the southernmost part of the site initially approved under planning application reference DC/09/2138 (for development primarily of up to 1044 dwellings including provision of employment floor space, fire station, community centre and expanded school facilities (As amended by DC/11/2004). Construction of a principal vehicular access from A24 (southbound) together with secondary bus/cycle/pedestrian accesses from Hills Farm Lane, internal highway network, diversion of existing public footpaths and a replacement footbridge over A24. Formation of associated landscape works including playing fields, allotments, recreation facilities and construction of acoustic bund/fence alongside A24 (Outline)).
- 2.5 This part of the site lies to the south of the Arun River and relates to Reserved Matters were approved under ref: DC/15/1702 comprising: 300 No. dwellings, 2 x football pitches, MUGA and NEAP, associated access, parking and landscape works. The latest application pertaining to this consent is DC/25/2015 relating to the removal of water neutrality conditions, granted in February 2026.
- 2.6 This reserved matters area covers Phases 7, 8, 10-13. Phase 7 has been built and occupied.
- 2.7 Phases 8 and 10 are situated within the eastern and southern sections of the wider development respectively. Phase 8 occupies a parcel of land to the east of the site, positioned south of the approved sports pitches and north of the principal internal access route. Phase 10 is located to the south of the site, adjacent to the southern site boundary and immediately south-west of Phase 8. The proposed amendments relate solely to these two phases, with no changes proposed elsewhere within the approved development.

Figure 2.1: Southern Site Phasing Plan



Planning History

2.8 The following is a summary of relevant permissions to the application site:

Application Ref.	Description of Development	Decision
DC/09/2138	Development primarily of up to 1044 dwellings including provision of employment floor space, fire station, community centre and expanded school facilities. Construction of a principal vehicular access from A24 (southbound) together with secondary bus/cycle/pedestrian accesses from Hills Farm Lane, internal highway network, diversion of existing public footpaths and a replacement footbridge over A24. Formation of associated landscape works including playing fields, allotments, recreation facilities and construction of acoustic bund/fence alongside A24 (Outline)	Approved 17 August 2010
DC/15/1702	Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters).	Approved 23 December 2016
DC/20/1568	Non Material Amendment to previously approved application DC/15/1702 (Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works	Approved 10 Dec 2020

	pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters)) Amendments to the approved house types.	
DC/21/1228	Non Material Amendment to previously approved application DC/15/1702 (Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters)) Amendments to Plots 1-19, 60-73 and 79-82 (now Plots 209-241, 249-250 and 288)	Approved 30 Nov 2012
DC/22/0409	Non Material Amendment to previously approved application DC/15/1702 (Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004)) to update previous house types in order to bring these in line with current building regulations and Nationally Described Space Standards and additional house type changes made to the scheme in order to improve the quality of the area.	Approved 5 May 2022
DC/22/0563	Non Material Amendment to previously approved application DC/17/0164 (Variation of Condition 1 to previously approved application DC/15/0499 (Erection of 208 No. dwellings (southern site Phase 1) with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters)) Updated house type drawings) Amendments to Phase 9.	Approved 5 May 2022
DC/24/0170	Non Material Amendment to previously approved application DC/15/1702 (Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters)). Re-alignment of Phase 8 Apartment Block to the existing site levels.	Approved 21 Feb 2024
DC/24/1996	Variation of Conditions 1 (Approved Plans), 7 (underground services), 8 (foul and surface water drainage), 12 (finished ground floor slab levels), and 18 (schedule of materials and samples) of previously approved application DC/15/1702 (Erection of 300 dwellings, 2 x football pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to outline planning permission DC/09/2138 (as amended by DC/11/2004) (Approval of Reserved Matters)), to allow the submission of water neutrality information to be secured under Condition 1 to demonstrate Phases 8, 10, 11, 12 and 13 are water neutral, and Variation of Conditions 7, 8, 12, and 18 to enable details pertaining to those conditions to be secured associated to Phase 8.	Approved 7 Aug 2025
DC/25/2015	Variation of Condition 1 and Removal of Conditions 4 and 11 (water neutrality strategy and verification) of previously approved application DC/24/1996 (Variation of Conditions of previously approved application DC/15/1702 (300 dwellings, 2 x football	Approved 23 Feb 2026

pitches, MUGA and NEAP with associated access, parking and landscape works pursuant to DC/09/2138 (as amended by DC/11/2004))

Pre-application Advice

- 2.9 Informal pre-application advice in respect of the proposed changes to Phases 8 and 10 was sought in September 2026 with the Council.
- 2.10 The feedback received indicated that no concerns were raised in relation to the proposed changes to the dwelling mix.
- 2.11 Advice was also provided to ensure that the scope of the amendments is clearly explained within the submission and that all associated supporting documentation is updated accordingly, including relevant arboricultural and ecological information, together with any necessary mitigation measures.
- 2.12 Overall, the feedback received confirmed that the proposed changes are capable of being progressed through the Non-Material Amendment process, subject to the submission clearly setting out and justifying the proposed amendments and their associated impacts
- 2.13 As such, the following sections of this Planning Statement clearly identify the scope of the proposed amendments, the plans and documents affected, and the consequential updates to supporting technical information where relevant. The assessment demonstrates that the proposed changes would not give rise to any material planning impacts beyond those already considered as part of the extant planning permission.

3. Proposed Amendments

Description of Development

- 3.1 The current NMA application seeks permission for the following:

*Non-Material Amendment to previously approved application DC/25/2015 .
Amendments sought in respect of the approved housetypes and mix of
approved housetypes in future phases 8 and 10.*

Housing Mix

- 3.2 The proposed changes to the approved housing mix are set out in the tables below. The total number of units remains the same overall (19 units), although phase 8 has a reduction of units from 13 to 8 dwellings, and phase 10 has a corresponding increase in units from 6 to 11 dwellings.
- 3.3 The proposed changes would be to market dwellings only, with the affordable housing requirement for the wider site remaining unchanged under this NMA.

Phase 8

<i>Phase 8</i>	<i>Approved Mix</i>	<i>Proposed Mix</i>
<i>1 bed flat</i>	2	0
<i>2 bed flat</i>	11	0
<i>2 bed house</i>	0	7
<i>3 bed house</i>	0	1
<i>4 bed house</i>	0	0
<i>5 bed house</i>	0	0
<i>Total</i>	13	8

Phase 10

<i>Phase 10</i>	<i>Approved Mix</i>	<i>Proposed Mix</i>
<i>1 bed flat</i>	0	0
<i>2 bed flat</i>	0	0

2 bed house	0	2
3 bed house	0	0
4 bed house	2	9
5 bed house	4	0
Total	6	11

Layout

- 3.4 The proposed amendments to Phase 8 involve the removal of the consented apartment block and its replacement with 8 no. houses. Consequential changes to the site layout, including revisions to parking provision and landscaping, are proposed to accommodate the replacement dwellings and ensure a cohesive and well-integrated development. The submitted proposed plans indicate the consented footprint in a blue dashed line.

Figure 3.1: Phase 8 Existing (top) and Proposed (bottom) Layout



- 3.5 The proposed layout for Phase 10 broadly reflects the block structure approved under the extant consent, with targeted amendments made to accommodate the revised housing mix. These changes have been carefully integrated to maintain the established

development pattern whilst ensuring the layout responds effectively to the updated mix of dwellings. The submitted proposed plans indicate the currently consented footprint.

Figure 3.2: Phase 10 Existing (top) and Proposed (bottom) Layout



Access

- 3.6 As a result of the removal of the consented apartment block and its replacement with 8 no. dwellings, the proposals include a redesign of the road layout in phase 8 to provide individual access to each dwelling. Given the changes in layout, details of vehicle tracking is indicated on the submitted vehicle track path analysis (2026UK673794-WSP-CIV-XX-DR-C-2400 - P02) in support of the phase 8 amendments.
- 3.7 The road layout remains the same as consented in phase 10 with minor changes to driveway locations.
- 3.8 No changes are proposed to the overall access strategy for either phase and this accords with the principles established in the outline planning permission.

Parking

- 3.9 Vehicle parking is provided on plot, or in close proximity to the front door on street, with visitor parking spaces provided on street in key locations.
- 3.10 Parking has been provided in accordance with West Sussex Parking Guidance SPD.

Design and Materials

- 3.11 All homes within the phase are a maximum of 2.5 storeys in height, which conforms with the parameters of the outline planning permission.
- 3.12 The proposed house types have been updated to reflect the latest Berkeley house types and the changed market conditions since the original planning application submission. A range of high quality materials and features have been selected for the house types in the proposed scheme based on the character of the surrounding area.
- 3.13 There will be an overall reduction in the scale of the development in Phase 8, as a consequence of the removal of the former 3 storey Phase 8 apartment building.

4. Planning Policy Context

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“Regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

4.2 The relevant Development Plan at the time of submission of the planning application consists of the Horsham District Planning Framework (2015) (HDPFF) and the Horsham Blueprint Business Neighbourhood Forum (2025).

4.3 Other material considerations relevant to this application include:

4.4 National Planning Policy Framework (August 2026)

- National Planning Practice Guidance
- West Sussex County Parking Standards (2003)

The Development Plan

Horsham District Planning Framework (2015)

4.5 The following policies that are of relevance to the consideration of the minor material amendment are set out below:

4.6 **Policy 1 – Strategic Policy: Sustainable Development**

The Council will take a positive approach that reflects the presumption in favour of sustainable development.

4.7 **Policy 16 - Strategic Policy: Meeting Local Housing Needs**

This policy sets out that development should provide a mix of housing sizes, types and tenures as evidenced in the latest Strategic Housing Market Assessment. 35% of dwellings will be affordable on site.

4.8 **Policy 24 – Strategic Policy: Environmental Protection**

Developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution.

4.9 **Policy 31 Green Infrastructure and Biodiversity**

The Council will support new development which retains and /or enhances significant features of nature conservation on development sites.

4.10 **Policy 32 - Strategic Policy: The Quality of New Development**

This policy required high quality and inclusive design for all development in the district that is based on a clear understanding of the local area and policy context for development.

4.11 Policy 33 - Development Principles

This policy requires development to conserve and enhance the natural and built environment through various criteria such as making efficient use of land, appropriate scale, massing and appearance in development of a high standard of design and layout, the retention of existing landscape and natural features, and maximising benefit from sunlight/passive solar energy etc.

4.12 Policy 38 – Flooding

Proposals must incorporate the use of sustainable drainage systems (SuDS) where technically feasible, or incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere.

4.13 Policy 41 - Parking

This policy sets out that parking provision must ensure a balance between good urban design, highway safety and residential amenity. Adequate parking must be provided within developments to meet the needs of anticipated users alongside consideration of cycle parking, motorcycle parking, charging plug in or low emission vehicles and the mobility impaired.

Horsham Blueprint Business Neighbourhood Forum (2025)

4.14 The Neighbourhood Plan was made in August 2022. Horsham District Council approved at Cabinet on the 17 September 2025 the application for the renewal of the status of Horsham Blueprint Business Neighbourhood Forum for a further five years. Horsham Blueprint Business Neighbourhood Forum is a designated body of the Unparished Area of Horsham Town.

4.15 The following policies that are of relevance to the proposed changes are set out below:

4.16 Policy HB2 Meeting Local Housing Needs

All residential development proposals in the Plan area shall provide a mix of housing as required by Policy 16 of the Horsham District Planning Framework and in accordance with Policy HB5 Design of Development in this Neighbourhood Plan. Proposals that will deliver smaller one, two and three bedroom dwellings will be strongly encouraged.

4.17 Policy HB4: Design of Development

Development is expected to demonstrate a high quality of design, which responds and integrates well with its surroundings, meets the changing needs of residents and minimises the impact on the natural environment. Development should provide adequate off-road parking for residents, visitors and service vehicles, in accordance with the West Sussex Parking Guidance

4.18 Policy HB7: A Welcoming Public Realm

Development proposals that have the potential to provide public realm improvements should consider and address those opportunities as part of their scheme.

Emerging Planning Policy

4.19 Horsham District Council have begun preparation of a new Local Plan (Horsham District Local Plan 2023-2040). It was submitted for examination in July 2024, with initial

hearings taking place in April 2026. Week 2 and 3 hearings are to take place in October 2026.

4.20 Following a review of the emerging Local Plan, it is considered that the following policies would be relevant to the application proposals:

- Strategic Policy 1: Sustainable Development
- Strategic Policy 11: Environmental Protection
- Strategic Policy 19: Development Quality
- Strategic Policy 20: Development Principles
- Policy 25: Parking
- Strategic Policy 27: Housing Provision
- Strategic Policy 38: Meeting Local Housing Needs
- Policy 40: Improving Housing Standards in the District.

4.21 The emerging Local Plan is attributed limited weight at this stage.

Other Material Considerations

National Planning Policy Framework (2026)

4.22 The revised National Planning Policy Framework (the 'NPPF') was published in August 2026. The Framework covers a range of issues to promote sustainable growth and protect the environment. The following policies of the NPPF are considered of particular relevance to the determination of this application.

4.23 **Policy HO8 (3)** - Where development proposals meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures, including the minimum proportion of Social Rent properties, a flexible approach should be taken to the application of any development plan requirements relating to the number of bedrooms provided in market homes, taking into account prevailing market conditions.

4.24 **Policy HO13** - To significantly boost the supply of homes, it is important that land with permission is developed without unnecessary delay. Proposals for major development involving the provision of housing should be capable of bringing the housing forward within a reasonable period, taking into account the proposed tenure mix for the development, local market conditions (including absorption rates) and the development history of the site.

4.25 **Policy DP3** - Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration,

reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified.

West Sussex County Parking Standards (2003)

- 4.26 This SPG provides a framework within which the County Council (as highway authority) can work with District and Borough Councils (as local planning authorities) to manage new development to assist the achievement of transport and environmental objectives.

5. Planning Assessment

Housing Mix

- 5.1 Policy 16 of the HDPF requires new residential development to provide a mix of housing sizes, types and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities.
- 5.2 As a result of changing market conditions, Berkeley are proposing amendments to Phases 8 and 10. The total number of units is the same, albeit 5 have been moved from phase 8 to phase 10. The proposed changes in mix are to market housing, with the affordable mix for the wider site unchanged.
- 5.3 Outline planning permission was originally granted in 2010 with the reserved matters approved in 2016. It is clear therefore that a significant period of time has elapsed since the phases were originally designed and that this has coincided with a period of economic, and social change, which has led to the proposed revisions.
- 5.4 The Northern West Sussex Strategic Housing Market Assessment (SHMA) was published in November 2019 and remains the most up to date information, although is itself somewhat out of date, approaching 7 years old. Notably this suggests the following mix of market housing in Horsham:

Type	SHMA
1 bed	5%
2 bed	30%
3 bed	40%
4+ bed	25%

- 5.5 Taken together, the approved phases are in contrast to each other in the areas of proposed change, delivering either small 1-2 bedroom flats (Phase 8) or large 5 bedroom detached homes (Phase 10), with no provision of 3-bedroom housing within these portions of the site. The proposed revisions create a more coherent mix across the two phases by replacing apartments with 2-3 bedroom housing and introducing smaller 2 and 4 bedroom housing within Phase 10.
- 5.6 The revised housing mix across Phases 8 and 10 responds positively to identified housing needs. The proposals introduce a broader range of house types, including both smaller and family-oriented dwellings, thereby enhancing housing choice and creating a more balanced mix across the development. Whilst the proposed distribution does not precisely mirror the SHMA profile, it provides a closer alignment with identified needs for family housing and achieves an overall proportion of larger homes that is broadly consistent with SHMA requirements. The revisions therefore contribute positively towards delivering a sustainable and balanced community respond positively

to current housing demand whilst maintaining compliance with the wider objectives of the development.

- 5.7 Furthermore, the proposed amendments to Phases 8 and 10 provide a viable range of house types and sizes across the two phases that appropriately responds to challenging market conditions, and enables the next phases of development to re-commence.
- 5.8 In this regard, the proposals are consistent with Policy HO8(3) of the NPPF (2026), which recognises that where a scheme delivers the required proportion and tenure mix of affordable housing, a flexible approach should be taken to the bedroom composition of market housing having regard to prevailing market conditions.
- 5.9 In addition, the amendments accord with Policy HO13 of the Framework, which supports flexibility in the delivery of residential and strategic sites to respond positively to changing circumstances, including evolving housing needs, market conditions and design considerations. The replacement of the approved apartment block with housing in Phase 8, alongside refinements to the housing mix within Phase 10, represents an appropriate evolution of the scheme that will assist in bringing forward deliverable housing whilst expanding consumer choice and responding to identified market demand.
- 5.10 The proposed quantum of residential units in total across both phases remains the same and essentially the changes proposed balance across the two phases and as such the amendments as proposed are considered to be acceptable and in accordance with HDPF policies HDPF 16, 32 and 33, and policy HB2 of the Neighbourhood Plan.
- 5.11 The proposed amendments are considered to constitute a non-material amendment to the extant planning permission. The changes are limited to revisions to the housing mix and house type distribution within Phases 8 and 10 and do not alter the approved development principles, land use, access strategy, overall quantum of development, infrastructure provision or the wider masterplan framework. The amended layout remains wholly contained within the approved development parcels and continues to deliver residential development consistent with the objectives of the original permission. Whilst the number, size and type of dwellings proposed within the phases has been refined, the amendments are not material to the approved scheme and do not give rise to impacts of a scale or nature materially different from those previously assessed. The proposals therefore maintain the character and intent of the approved development whilst providing a more market-responsive housing mix.
- 5.12 Furthermore, the amendments align with the flexibility envisaged by NPPF Policy HO8 and HO13, which recognises that changes to housing need, market demand and design considerations may justify refinements as individual phases are brought forward. In this context, the revisions represent a proportionate adjustment to the approved housing mix rather than a fundamental change to the development for which planning permission has been granted. As such, the proposed amendments are appropriately considered through the non-material amendment process.

Design

- 5.13 In order to accommodate the revised unit types, limited amendments to the approved layouts are required. These changes are confined to the application parcels and do not alter the overarching development framework, access arrangements or design principles.
- 5.14 The proposed amendments have been carefully designed to integrate within the approved development and respond appropriately to the characteristics of the wider scheme. The revised layouts continue to make efficient use of the site whilst respecting established design principles, maintaining appropriate relationships between dwellings and safeguarding visual and residential amenity.
- 5.15 Appropriate vehicle manoeuvring space, parking provision, servicing arrangements and refuse collection facilities continue to be accommodated in accordance with the approved design approach and relevant standards. Full details are provided on the accompanying drawings.
- 5.16 The proposed dwellings will continue to utilise the approved architectural approach, incorporating the established palette of materials, detailing and design features secured through the parent permission. The amendments therefore maintain the character and appearance of the approved development and ensure a cohesive relationship with surrounding phases.
- 5.17 The proposed changes in Phase 10 are proposed within the individual plots and will not have a discernible change to the streetscene in this Phase. There will be an overall reduction in the scale of the development in Phase 8, as a consequence of the removal of the former 3 storey Phase 8 apartment building. Areas of previous communal ground serving the former apartments will become private gardens and are balanced by additional front garden and amenity planting in and around the parking forecourt.
- 5.18 The amended house types and elevations submitted in support of the application demonstrate that the revised proposals remain consistent with the scale, massing and design quality of the approved scheme. Bar the aforementioned reduction in height in Phase 8. The proposed changes do not result in any material alteration to the character or appearance of the development when viewed within the context of the wider site.
- 5.19 The proposed amendments are limited in scope and relate solely to refinements to the approved housing mix and associated layout adjustments. The changes do not result in any materially different planning impacts.
- 5.20 The amendments maintain compliance with HDPF policies 32 and 33 and policies HB4 and HB7 of the Neighbourhood Plan. The proposals represent a proportionate and appropriate refinement to the approved scheme, enabling the delivery of a more market-responsive housing mix whilst preserving the overall character, appearance and planning benefits of the consented development.

- 5.21 The amendments are therefore considered non-material in nature and are appropriately sought through an application made pursuant to Section 96A of the Town and Country Planning Act 1990.

Residential Amenity

- 5.22 The proposed Non-Material Amendment is limited to revisions to the approved housing mix and associated minor layout adjustments within Phases 8 and 10. The amendments have been designed within the parameters of the consented layout and maintain appropriate relationships between dwellings, private amenity areas and the wider development.
- 5.23 Appropriate separation distances between dwellings continue to be achieved, ensuring that privacy levels, outlook and living conditions for existing and future occupiers are maintained. The amendments do not introduce any materially different relationships that would give rise to overlooking, overbearing impacts or loss of privacy beyond those already assessed through the planning permission.
- 5.24 The revised house types and plot arrangements continue to respect the character and form of the approved development and have been designed to ensure that the amenities of neighbouring and future residents are appropriately protected. The proposals do not result in any significant changes to building siting, scale or orientation that would materially affect residential amenity.
- 5.25 The amendments retain appropriate private garden provision, boundary treatments and landscaping opportunities consistent with the approved scheme. As such, the proposals do not generate any new or materially different impacts in respect of overlooking, disturbance or loss of amenity for adjoining or future residents.
- 5.26 The proposed changes are therefore considered to accord with HDPF policies 24, 32 and 33 and policy HB4 of the Neighbourhood Plan. The amendments do not result in any material change to the amenity impacts previously assessed and approved and are therefore suitable for consideration as a Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990.

Parking

- 5.27 The amended layout has been designed to ensure that appropriate levels of parking provision are maintained for the revised dwelling mix. The proposals continue to provide parking spaces in convenient and accessible locations, integrated into the development in a manner consistent with the approved scheme.
- 5.28 Vehicular circulation within the phases remains unchanged in principle, with the development continuing to provide safe and suitable access for residents, visitors, service vehicles and emergency vehicles. Adequate manoeuvring space is retained throughout the amended layouts, ensuring the continued functionality of the development.

- 5.29 The proposed amendments do not give rise to any material increase in traffic generation beyond that associated with the approved development and do not introduce any new highway safety concerns.
- 5.30 The revised proposals continue to provide an appropriate balance between parking provision, landscaping and built form whilst maintaining the quality and character of the approved development. As such, the amendments do not result in any materially different impacts in relation to parking demand, accessibility or highway operation.
- 5.31 The proposed amendments as proposed are considered to be acceptable and in accordance with HDPF policies HDPF 41, and policy HB4 of the Neighbourhood Plan. The amendments do not give rise to any material transport or parking impacts and are appropriately considered through the Non-Material Amendment process under Section 96A of the Town and Country Planning Act 1990.

Flooding and Drainage

- 5.32 The proposed changes relate solely to revisions to the approved housing mix and associated minor amendments to the approved layouts within Phases 8 and 10. The proposals do not alter the principles of surface water management, or the wider flood risk mitigation measures secured through the outline planning permission, or relevant conditions.
- 5.33 The amendments are contained wholly within the approved development parcels and do not result in any material changes to the extent of built development that would give rise to additional flood risk or materially affect the operation of the approved drainage infrastructure. The proposals can continue to be accommodated within the approved drainage framework for the wider development.
- 5.34 The approved approach to the management of surface water runoff, including the use of sustainable drainage measures and associated infrastructure, remains unchanged by the proposed amendments. The development will continue to drain in accordance with the approved strategy and no modifications are required to the overarching drainage design as a consequence of the revised housing mix.
- 5.35 Furthermore, the amendments do not affect any approved flood attenuation measures, drainage corridors, easements, maintenance arrangements or flood risk mitigation works associated with the wider scheme. As such, the proposals do not give rise to any increased risk of flooding either on-site or elsewhere.
- 5.36 The proposed changes are therefore not considered to introduce any new or materially different flood risk or drainage impacts when compared to the approved development. The amendments maintain compliance with the relevant flood risk and drainage policies of the Development Plan and are appropriately considered through the Non-Material Amendment procedure under Section 96A of the Town and Country Planning Act 1990.

Arboricultural

- 5.37 The revised layout incorporates and maintains the retention of the better, more sustainable specimens.
- 5.38 There are no Tree Preservation Orders in force at the site, and it is not within a Conservation Area. All of the 'A' and 'B' category trees are to be retained and protected throughout the development. The trees proposed for removal as part of the revised layout are category 'U' specimens only. Given their poor condition and limited arboricultural value, their removal is not considered to materially alter the approved development or the arboricultural assessment previously undertaken.
- 5.39 Where proposed new hard surfaces encroach into the RPA of trees highlighted for retention, sensitive surface construction will be required. The overall incursion into RPAs of Category B trees reduces by comparison to the approved extant permission as a consequence of the removal of the apartment building and associated parking and turning area.
- 5.40 The relationship between the buildings and retained trees in the revised layout is considered sustainable, as demonstrated in the submitted AIA and Tree Protection Plans (TPP).
- 5.41 Overall, the proposed arboricultural amendments are limited in scope and do not give rise to any materially different impacts when compared to the approved scheme. The proposals retain all Category A and B trees, with only a limited number of Category U specimens proposed for removal, and continue to accord with the approved arboricultural and landscape strategy. As demonstrated on the submitted AIA and TPP, the relationship between the development and retained trees remains acceptable, with suitable protection measures capable of being implemented throughout construction. The proposed changes do not materially alter the character of the development or its arboricultural impacts and, as such, should be considered as a Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990.

Ecology

- 5.42 A Preliminary Ecological Appraisal has been undertaken to support this NMA application. The assessment confirms that the proposed amendments are limited to changes in the design and housing mix of 19 plots only and do not alter the approved landscape structure, ecological mitigation strategy or biodiversity enhancement measures secured through the Reserved Matters approval.
- 5.43 The ecological appraisal confirms that the key habitats retained under the approved scheme will continue to be retained as part of the amended proposals. In particular, areas identified as providing suitable foraging and commuting habitat for bats, together with the two mature oak trees identified as having bat roost potential, remain unaffected by the proposed amendments and are not proposed for removal. The approved landscaping, habitat creation and ecological enhancement measures will continue to be delivered as previously approved.

- 5.44 The assessment concludes that the proposed amendments do not result in any new or materially different impacts on designated sites, habitats, bats, birds, dormice, amphibians, [REDACTED] invertebrates or other ecological receptors when compared with the extant consent. Any mitigation measures previously identified through the approved scheme remain applicable and capable of implementation.
- 5.45 Phases 10-13 are considered to hold grassland habitat suitable for reptiles. While Phases 8 and 9 (the latter of which does not form part of this reserve matters area) are largely cleared sites void of suitable habitat conditions. The wider site has been subject to reptile translocation previously. Based on the above, a reptile survey has been carried which has resulted in reptiles being found present in Phase 10-13 areas only. The report therefore recommends appropriate mitigation is proposed prior to the commencement of Phases 10-13, to secure translocation to an off-site location immediately to the north of the Highwood estate. This is the same translocation site, in Berkeley's ownership, as secured when the northern site reserved matters permission was granted. The mitigation strategy proposed can be secured in an appropriately worded condition associated to the commencement of Phases 10-13. No reptile mitigation is however required associated to the development of Phases 8 and 9.
- 5.46 As such, it is considered that the proposed amendments do not result in any materially different ecological impacts, mitigation requirements or biodiversity outcomes when compared to the currently consented scheme. The proposals should therefore be considered as a Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990

6. Summary and Conclusions

- 6.1 This Planning Statement has been prepared in support of a Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990. The application seeks consent for minor revisions to the approved housing mix within Phases 8 and 10 together with associated amendments to the approved layouts.
- 6.2 The proposed changes do not alter the approved development principles, land use, site access arrangements, infrastructure provision, drainage strategy, landscaping framework or the overall character and appearance of the wider development.
- 6.3 The revised housing mix responds positively to current market demand and housing delivery objectives. The proposals introduce a more balanced range of dwelling types across the two phases while retaining the design quality and placemaking principles approved as part of the parent permission. The amendments support the delivery of a viable, sustainable and market-responsive development without giving rise to any materially different planning impacts. The amendments are necessary to enable the re-commencement of construction in the remaining phases of development.
- 6.4 The assessment contained within this statement demonstrates that the proposed changes do not result in any material impacts in respect of design, residential amenity, highways and parking, flood risk and drainage, arboriculture, landscaping or any other technical matter. The approved mitigation measures and development strategies remain applicable and effective.
- 6.5 The proposed amendments are therefore considered to remain compliant with the relevant policies of the Development Plan and continue to accord with the objectives of national planning policy. Furthermore, the amendments reflect the flexibility envisaged by the NPPF for the delivery of housing developments and strategic sites, allowing schemes to respond appropriately to changing market conditions and housing requirements.
- 6.6 The proposals change a total of 19 plots out of 257 remaining across Phases 8, and 10-13. In this context and having regard to the scale, nature and extent of the proposed changes, the resulting development would not appear materially different from that previously approved, in the context of the overall scheme, and would not generate any new or materially different planning impacts. The amendments are therefore considered to be non-material in nature and are appropriately sought through an application made pursuant to Section 96A of the Town and Country Planning Act 1990.
- 6.7 For the reasons set out above, it is respectfully requested that the Local Planning Authority approves the proposed Non-Material Amendment.

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