

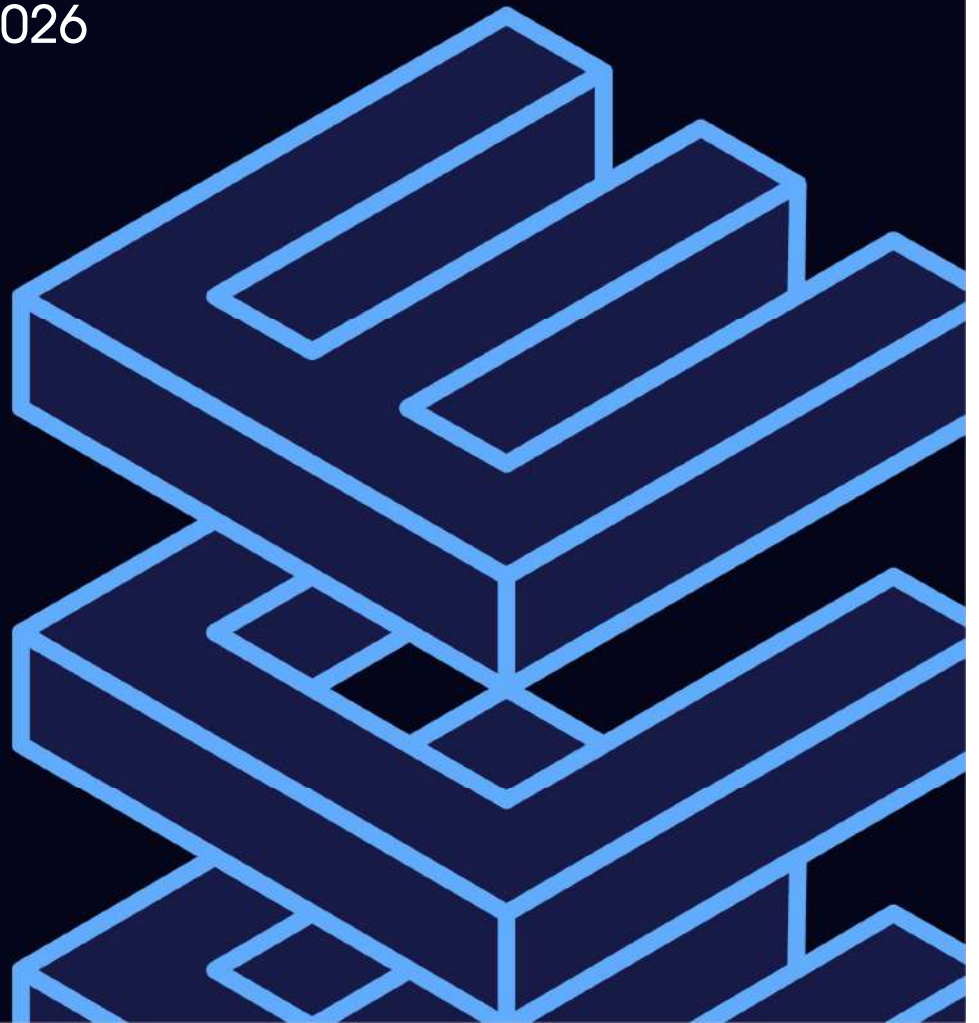


ECE Planning

High Weald National Landscape Exceptional Circumstances Report

Land South of Crawley
Road

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1. Introduction

- 1.1. This report considering the exceptional circumstances to support a proposed development of up to 120 dwellings on land located within the High Weald National Landscape (HWNL) is prepared by ECE Planning on behalf of our clients, FCP Land 4 Ltd. It supports an outline planning application submitted to Horsham District Council (HDC) for the proposed development at Land south of Crawley Road, Horsham.
- 1.2. This document considers the proposed development against the tests set out in Paragraph 190 of the National Planning Policy Framework (NPPF). Paragraph 190 sets out the circumstances where development can be permitted in National Landscapes (NLs) and the criteria that require detailed assessment.
- 1.3. As demonstrated within this report, we consider exceptional circumstances exist for the following reasons:
 - **Severe Housing Need:** Horsham District faces a critical housing land supply deficit (1.7 years vs. 5-year requirement), significantly impacting the delivery of both market and affordable housing. There is also a substantial unmet housing need from Crawley Borough that Horsham is expected to help address.
 - **Critical Affordable Housing Delivery Gap:** Beyond the overall housing land supply deficit, Horsham District faces a chronic and deep-seated failure to deliver sufficient affordable housing to meet identified needs. This persistent undersupply, recognised as a significant factor carrying substantial weight in planning considerations, constitutes a distinct exceptional circumstance.
 - **Sustainability and Strategic Location:** Horsham Town is identified as the most sustainable settlement in the district and is strategically located less than 5km from Crawley, making it an appropriate focus for development and a logical location to address cross-boundary need.
 - **Inadequacy of Alternatives:** An exhaustive review of alternative sites within and outside the High Weald National Landscape shows that most are either significantly more constrained (landscape, ecology, flood risk, access), less sustainable, or unlikely to deliver housing in the short-to-medium term compared to the proposed site.
 - **Site Suitability and Edge Location:** The proposed site is located on the edge of Horsham Town, within an area identified by the Council's own Landscape Capacity Study as having moderate potential for residential development. It is already influenced by existing urban development and transport infrastructure, meaning its 'National Landscape' character is less intrinsic than deeper within the designation.
 - **Landscape and Environmental Enhancement:** The development is designed to retain key landscape characteristics and actively enhance the environment. It includes extensive new woodland planting, delivers substantial Biodiversity Net Gain, provides dedicated public open space, and creates crucial habitat connectivity, thereby conserving and improving the High Weald environment and exceeding relevant management objectives.
 - **Demonstrable Public Interest through Comprehensive Benefits:** The proposed development demonstrably serves the public interest by addressing critical housing needs and delivering a comprehensive package of significant positive contributions. These include exceeding affordable housing targets, substantial environmental enhancements through extensive woodland planting and biodiversity gains,

dedicated provision of public open space, and potential for improved public access and woodland ecology, ensuring the overall benefits strongly justify the proposal.

- 1.4. Matters such as site description, planning history and other considerations relating to the detail of the development are set out elsewhere in the submission pack and are not repeated in this report.

2. Major Development in the High Weald National Landscape

2.1. Paragraph 190 of the NPPF states:

"When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated"*

2.2. This report considers the exceptional circumstances which exist within Horsham District which necessitate new development occurring within the HWNL. We then consider the assessment criteria of Paragraph 190 as they apply to the outline application.

Exceptional Circumstances

Housing Land Supply

2.2.1. Exceptional circumstances exist within Horsham District which justify the development of land within the National Landscape.

2.2.2. HDC is tasked by government to meet its identified housing, economic and infrastructure needs within what is historically a relatively unconstrained district. However, HDC has been adversely impacted over the past five years by the need to demonstrate water neutrality in new development. This followed Natural England's publication of a position paper relating to European Protected Sites in the Arun Valley which it considered were being unduly impacted by water abstraction.

2.2.3. This Position Paper was withdrawn in November 2025 but not before it had held up delivery of thousands of much needed new homes over the period. It also severely delayed the emergence of a new local plan for Horsham which further exacerbated the housing land supply position in the district.

2.2.4. The most recent published figure for Horsham is some 1.7 years supply of housing land which is a significant shortfall against the five-year target. The most recently published Housing Delivery Test figures show Horsham delivering only 62% against the number of houses required over a three-year period. These figures engage the presumption in favour of sustainable development for the determination of planning applications on land not effected by Footnote 7 of the NPPF.

Affordable Housing

2.2.5. The delivery of affordable housing in Horsham has suffered as a consequence of this continued undersupply of housing.

2.2.6. Horsham's own evidence base determines that net affordable need in Horsham is 503 affordable dwellings per annum (Northern West Sussex Strategic Housing Market Assessment). This represents 65% of overall housing provision against the 777 dwellings per

- annum target included in the submission emerging Local Plan. This is a significant identified need for the district.
- 2.2.7. The ability to deliver this level of identified affordable need is questionable when previous delivery rates are considered. A report by Marrons which supported a planning application at Partridge Green (reference DC/25/1922 and available on the Council's website) demonstrates a shortfall of between 2,179 and 3,275 affordable dwellings over a 12-year period (2011/12 to 2022/23). This means that a maximum of 44% affordable need was delivered over this time.
- 2.2.8. The number of households on the waiting list rose by 56% between 2014 and 2024, with 754 households on the waiting list as of 2024. Further, a report from Carter Jonas supporting the appeal at Horsham Golf and Fitness (reference APP/Z3825/W/24/3355546, which was allowed by the Inspector) calculated a revised need for the delivery of 955 affordable homes per annum. The Inspector in that appeal stated that the delivery of *"up to 800 new homes including a policy compliant level of 280 affordable and custom build homes, in an authority which has a lamentable housing land supply record"* carried *"very substantial weight"* in the planning balance.

Emerging Local Plan and Meeting Unmet Need

- 2.2.9. Horsham has historically played an important role in the wider North West Sussex Housing Market Area through the delivery of housing to meet unmet need from Crawley Borough Council.
- 2.2.10. The adopted Horsham District Planning Framework (HDPF) notes at paragraph 6.6 that *"Over the next 10 years, Crawley will be reaching its capacity within its boundary which is drawn tightly around the town. Under the Duty to Cooperate Horsham District Council has sought to plan for growth from these constrained areas. This will maintain, as far as possible the ability to accommodate growth by continuing to plan for in-migration which reflects the key functional linkages between where people live and work with in the district and the housing market areas beyond the district boundary. This will contribute to meeting the housing need of other local authorities including those generated by London."*
- 2.2.11. The development at Kilnwood Vale, on the boundary with Crawley but within Horsham District is an example of development within HDC which contributed to meeting cross boundary need. Indeed, the strategic development at North Horsham (Policy SD1 of the HDPF), part of which is currently being constructed, is another significant contributor to meeting Crawley's need given its proximity to the boundary and location adjacent to the most sustainable settlement in the district.
- 2.2.12. However, the impact of water neutrality on the district resulted in the Council's position in the emerging plan that, irrespective of the proposed allocation land west of Ifield to deliver 3,000 new homes, that Horsham is *"currently unable to contribute to meeting Crawley's unmet housing needs."*
- 2.2.13. Paragraph 10.11 of the plan noted that, without any requirement for water neutrality, there was potential for Horsham to accommodate around 50% of Crawley's unmet need.
- 2.2.14. The withdrawal of the Natural England position statement has resulted in HDC needing to take a fresh look at the number of new homes it can deliver in the emerging plan. The Council's letter to the Local Plan Inspector (dated 4th February 2026) notes that HDC *"needs to consider the extent to which it can contribute towards meeting the unmet housing needs arising from Crawley Borough. The total unmet needs arising from Crawley as set out in their adopted local plan is 7,506 homes for the period to 2040."*
- 2.2.15. It goes on to state that the Council needs to consider *"the extent to which HDC can accommodate half of Crawley's unmet needs. In the period to 2040, this equates to some 3,753 homes."* This figure equals some 221 dpa over the plan period (taken to be between

2023 and 2040). This does not include any headroom which is likely to be necessary to ensure the required number of houses can be delivered in the plan period.

- 2.2.16. The Council has indicated to the Local Plan Inspector that it is reviewing those sites it had previously dismissed as being not suitable for allocation as part of this proves. However, this does not include sites located within the High Weald National Landscape (HWNL) given the Council had screened these out at an early stage given their location in a protected area.
- 2.2.17. We consider that this is an unreasonable position given it is possible that some sites located within the HWNL may not be as sensitive or constrained more generally than others which are not in a protected landscape. Further, the Council must consider all available sites to address the extremely poor housing land supply position. Indeed, the Local Plan Inspector examining the Mid Sussex Local Plan (and who will also be examining the Horsham Plan) advised officers not to exclude sites in the HWNL on the sole account of their protected status.

High Weald National Landscape

- 2.2.18. The area of HWNL within Horsham District is principally located between Horsham Town and Crawley Borough. This is shown on the map extract below:

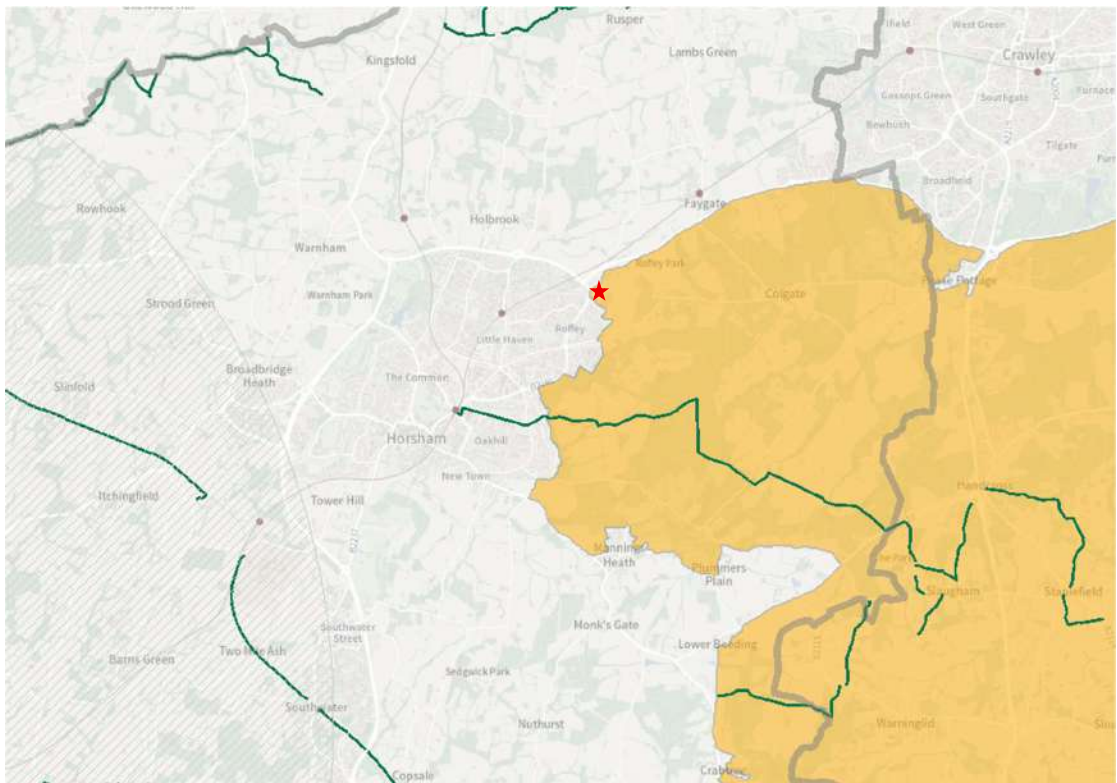


Figure 1 - Extent of High Weald in Horsham District

- 2.2.19. It is logical to provide land to meet part of Crawley's housing need as close to the district boundary as possible. Paragraph 3.25 of the HDPF notes that the delivery of strategic sites at Kilnwood Vale and west of Horsham would be complemented by the allocation at North Horsham to deliver for the wider area, including Crawley.
- 2.2.20. However, it is evident from the work underpinning both the Crawley Local Plan and emerging Horsham plan that more land is required to address the high levels of unmet need which persist in the North West Sussex Housing Market Area.

- 2.2.21. Horsham Town and land adjoining should continue to be the focus for housing delivery given it is the most sustainable location in the district and located less than 5km from Crawley.
- 2.2.22. However, as can be seen from Figure 1, much of the land between Horsham and Crawley is within the HWNL where HDC has previously rejected sites without further assessment.
- 2.2.23. HDC has also undertaken a landscape capacity study of its settlements as part of the evidence base supporting proposed site allocations. There are very few parcels of land adjoining Horsham Town which are considered to have potential for residential development. Indeed, there is only one parcel with high capacity for medium or large-scale capacity, located to the north west of the North Horsham Strategic Allocation. This can not deliver housing in the short to medium term given it is a commercial and waste management site.
- 2.2.24. There are only four parcels considered to have moderate capacity for medium scale development and one with low capacity for medium scale development. Only one parcel is located to the eastern side of Horsham Town. The other three are located to the west and north west of Horsham, two of which contain housing allocations. The landscape capacity study considered no parcel of land to the south of the town as being suitable for residential development.
- 2.2.25. The parcel of land to the east of Horsham, in closer proximity to Crawley, includes the land subject to this planning application. This is shown on the map extract below:

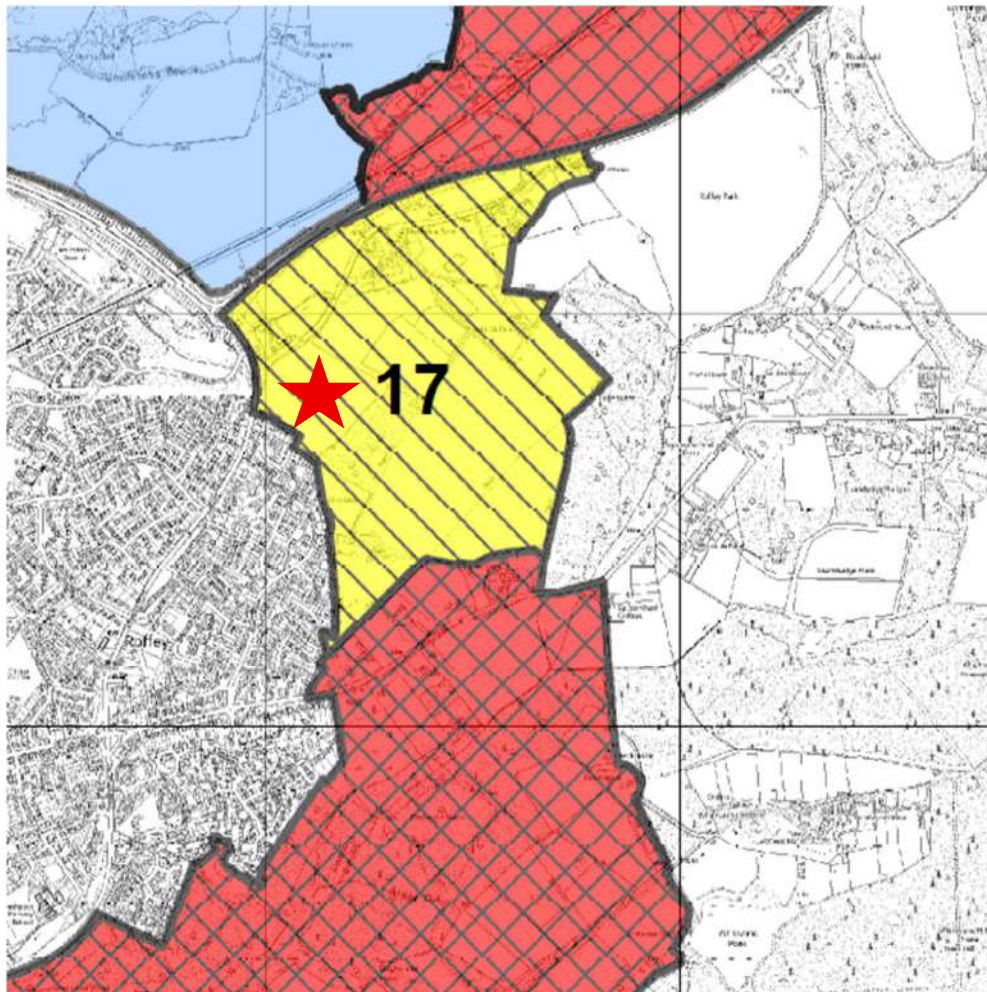


Figure 2 - HDC Land capacity study extract. Site marked with a red star

2.2.26. The majority of land identified in Figure 2 as parcel 17 is located within the HWNL boundary. The western and southern extents of the Land south of Crawley road (subject to this application) form the HWNL boundary edge with Horsham Town. The only part of the Parcel 17 not within the HWNL is Moorhead Farm, located to the north of the Application Site, abutting the A264.

2.2.27. The Landscape Capacity Study notes the following regarding Parcel 17:

- The relatively open nature of the land with only partial enclosure by woodland and hedgerows results in moderate visual sensitivity for housing and moderate to high sensitivity for larger scale employment development.
- Development on the more rising ground to the south would be more visually prominent.
- Low tranquillity in the north due to the proximity of the A264; moderate tranquillity in the south of the area away from the road
- Although the landscape is partly within High Weald AONB some of the distinctive landscape characteristics of the High Weald are less apparent
- Some of the landscape features and qualities of the area are sensitive to development. The overall rural character and moderate-high visual sensitivity means that there is some limited capacity for housing development closer to the existing urban edge but this should not extend further south and north east as this could be perceived as a significant incursion into the AONB or ribbon development along the A264.

2.2.28. The below map shows an annotated aerial image of Parcel 17:



Figure 3 - Parcel 17

- 2.2.29. Figure 3 shows the Application Site within the red line. The brown coloured land to the north is outside of the HWNL boundary. The land shown in light blue formed the balance of the previous application at the site which sought permission for 473 new dwellings. This was refused and dismissed at appeal. Development of the blue land was considered harmful to the character and appearance of the HWNL. The green land is an allotment and playing field, whilst the land to the north east of the parcel is too far from the settlement edge to be considered suitable for housing.
- 2.2.30. The Inspector found development of the land within the red edge (which forms the proposed application site) to be less harmful given its settlement edge location and proximity to the A264 and urban area more generally. This finding is in keeping with those of the landscape capacity study which concluded there are low levels of tranquillity to the north of the parcel and that some characteristics of the HWNL are not present in this parcel.
- 2.2.31. The HDC Landscape Capacity Study concluded that parcel 17 is one of only four potentially suitable sites for residential development around Horsham Town, the most sustainable location in the district. The previous appeal, the prevailing land use of land to the south and the unsuitability of land to the east of the parcel means the only logical location for development within this parcel is the Application Site.
- 2.2.32. This is considered an exceptional circumstance which supports development of the site within the HWNL.

NPPF – Paragraph 190

- 2.2.33. Paragraph 190 sets out the tests a decision maker must consider when determining whether exceptional circumstances exist.
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- 2.2.34. The need for the development primarily stems from:
- The overall need for housing is driven by the government’s stated policy objective of “*significantly boosting the supply of homes*” (NPPF Paragraph 61). The government’s commitment to this is evidenced in the housing Secretary’s press release in September 2025 where Steve Reed stated “*We are doubling down on our plans to unleash one of the biggest eras of building in our country’s history and we are backing the builders all the way. “Through major planning reform and investment, we will break down the barriers to development and build the 1.5 million homes this country needs as part of our Plan for Change.”* - This is further evidenced by the current consultation on proposed changes to the NPPF which the Secretary of State in his letter of 16th December 2025 noted are designed to “*support the delivery of more homes and more affordable homes*”.
 - The need to deliver market and affordable housing in the district, of which there is a significant and chronic undersupply.
- 2.2.35. HDC’s most recent Five-Year Housing Land Supply Report (December 2025) confirms that the district is unable to demonstrate a 5-year Housing Land Supply. The Council have calculated a requirement of 6,690 new homes over the 5-year period (new Standard Method: December 2024 NPPF). A 20% buffer is also required making a 5-year Housing Land Supply requirement of 8,028 dwellings.
- 2.2.36. HDC can only demonstrate a five-year supply of 2,742 dwellings, a shortfall of 5,286 which equates to a 5-year Housing Land Supply of 1.7 years.

- 2.2.37. There is therefore a demonstrable and significant level of unmet housing need in Horsham District.
- 2.2.38. This has been exacerbated by the continued failure to adopt a new local plan. The Development Plan comprises the Horsham District Planning Framework which was adopted in 2015. HDC reached Regulation 19 stage on an emerging local plan in 2021 but this was withdrawn shortly before the Natural England Position Statement on Water Neutrality was published.
- 2.2.39. A revised local plan was submitted for examination in 2024 with hearings held toward the end of the year. However, the Inspector halted the hearings early citing fundamental concerns with the plan in terms of the Duty to Cooperate and broader matters of spatial strategy.
- 2.2.40. Hearings are due to reopen in April 2026 following significant changes in circumstance including the withdrawal of the Natural England Position statement on water neutrality and the government's announcement that the Duty to Cooperate is no longer in place for the purposes of local plan examinations.
- 2.2.41. The emerging plan continues to be examined under the provisions of the 2023 NPPF with its housing target based on the old standard method. However, the end of water neutrality and the stated intention of HDC to now meet some 50% of Crawley's Housing need means that the emerging plan needs to find an additional 3,753 homes over the plan period.
- 2.2.42. Further, it is material that housing numbers proposed in the emerging plan are based on the old standard method which provided a housing requirement to Horsham of 917dpa. The revised method increases this figure to 1,357dpa. Crawley Borough Council's need has also increased from 476dpa to 654dap, further worsening the level of unmet need in the wider strategic housing market area.
- 2.2.43. It is unclear at the time of writing which additional sites will be proposed to find the additional 3,753 homes required. Further, the actual level of unmet need is higher on account of the revised standard method significantly increasing the number of new homes needed per year to meet demand in both Horsham and Crawley. Therefore, a significant shortfall currently exists between what is proposed and what is needed which is exacerbated by the increased need calculated by the new standard method.
- 2.2.44. There is a clear and ongoing need for the delivery of new homes throughout the country. This is particularly exacerbated in the south east of England where demand for new housing is high but so are land values and development costs. Authorities are also constrained which makes for a difficult plan making environment.
- 2.2.45. It is therefore critical for development sites in sustainable locations to come forward to help meet this need. The emerging Horsham Local Plan seeks to direct growth to the most sustainable locations in its area. It also clearly acknowledges the need to meet half of Crawley's unmet need. This should ideally be located with reference to the administrative boundaries of Horsham and Crawley districts.
- 2.2.46. The proposed outline planning application site abuts Horsham Town and is within 5km of Crawley in an area identified as having capacity for moderate residential development.
- 2.2.47. This amounts to exceptional circumstances in favour of developing the site for housing.

Affordable Housing

- 2.2.48. There is also a strong need for the delivery of affordable housing in HDC, as noted earlier in this report. This is with reference to the report by Marrons submitted in support of the planning application at Partridge Green.

- 2.2.49. Planning Inspectors have also recognised the Council's poor record in terms of affordable housing. In the appeal decision on Hilland House, New Road, Billingshurst (reference APP/C1435/W/24/3356658) the Inspector noted that the shortfall of affordable housing in the district is a "*deep and longstanding issue*" and that this had been acknowledged by the Council at the Inquiry.
- 2.2.50. Further, the Inspector's report on an appeal at Land south of the A271 and east of the A22 (reference APP/Z3825/W/25/3361285) stated that the delivery of 43% affordable homes had significant weight in the planning balance "*in an area where there is a substantial and ongoing shortfall in supply*".
- 2.2.51. It remains difficult for people on low to average incomes to get on the housing market in Horsham. The Horsham Housing Study Delivery Update (2023) notes that average house prices in Horsham Town are £452,000. This level is slightly lower in Crawley at £362,000 though it is noted that both of these figures are likely to have increased since the report was published.
- 2.2.52. Horsham's Social-Rented-Housing-and-First-Homes-Study-2022 notes average earnings across the district are in the region of £35,000 per annum. It notes that "*With a salary of £30,000, an individual might be able to buy a home for around £150,000 (based on a 10% deposit and 4.5 times mortgage multiple) and with two salaries at this level would be able to afford around £300,000.*" This remains significantly lower than the average house price across Horsham and is still below the amount required to purchase in Crawley.
- 2.2.53. It is noted that this is a similar situation to much of the south east of England and not exceptional in and of itself. However, it is an important element of the wider picture in Horsham of the chronic under delivery of both market and affordable housing as set out earlier in this report.
- 2.2.54. Further, the proposed development would deliver 45% affordable housing on site (54 dwellings). This is significantly above the existing local plan requirement and 5% above emerging policy. This carries substantial weight in favour of the planning application.
- 2.2.55. The development in and of itself is not so significant that any refusal would have an adverse or damaging impact on the national or local economy. However, the construction of these dwellings would deliver short term economic benefits during the build stage. Further, future residents would spend money in the local economy and contribute to council tax receipts. This would receive moderate weight in the application of the planning balance.
- 2.2.56. The overall chronic lack of five-year housing land supply and the failure to deliver affordable housing to meet the demand in the district, demonstrates that there is a clear 'need' for the development to satisfy Paragraph 190 a) of the NPPF.
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way;*
- 2.2.57. The application site is located to the north west extent of the HWNL designation abutting the settlement boundary with Horsham Town. The HWNL designation abuts the eastern extent of the Horsham built up area boundary and extends to the administrative boarder with Crawley to the south of the A264. It also extends to the south east of Horsham Town to the boundary with Mid Sussex District Council, running to the north of Mannings Heath before curving down so that it abuts the eastern settlement extents of Lower Beeding and Crabtree.
- 2.2.58. The HWNL designation therefore covers a small percentage of Horsham District. However, it exerts a significant development constraint on Horsham Town, which is the most sustainable settlement in the district. It also poses a significant constraint to Crawley Borough, with the designation surrounding its southern boundary. Horsham and Crawley towns are two of the most sustainable settlements in the sub region and therefore preferred locations for new residential development.

- 2.2.59. It is noted that Horsham district has a large number of sites elsewhere within its administrative boundary which are not constrained by the HWNL but have so far been rejected for site allocations for other reasons. The Council is currently re-assessing these as part of the emerging local plan process with a view to providing more housing land. We understand that it is not actively considering any sites put forward which are located within the HWNL.
- 2.2.60. As noted earlier in this report, much of the additional demand for housing land in Horsham as part of the emerging plan is generated by the intention to deliver at least half of Crawley's unmet need. It is therefore appropriate to consider locating additional housing land in as close proximity to Crawley Borough as possible before considering locations deeper into Horsham.
- 2.2.61. The Horsham Housing Delivery Study (2023) identifies three housing market sub-areas in the District: North, South and West. The northern sub area is the closest to the boundary with Crawley and includes the following settlements: Horsham Town, Broadbridge Heath and Southwater together with surrounding parishes including Colgate, Cowfold, Itchingfield, Lower Beading, Nuthurst, Rudgwick, Rusper, Shipley, Slinfold, Warnham and West Grinstead.
- 2.2.62. This remains a large area of Horsham and not all settlements are equally well located in terms of proximity to Crawley. We have therefore taken a 5km radius from the centre of the Application Site as the search area for considering other locations where development could meet the unmet need outside of the HWNL.



Figure 4 - 5km Radius from Application Site

2.2.63. We have also considered other sites proposed located within the HWNL for completeness

Emerging Local Plan

2.2.64. Horsham Town is the most appropriate location for growth in the district given it is the only classified 'Main Town' identified in the settlement hierarchy as set out in Policy S2 of the emerging plan. The policy notes Horsham is a "*Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.*"

2.2.65. It is also within the Northern Housing Market sub area and located less than 5km from Crawley, with which it is well connected via the A264. Horsham Town is therefore the closest sustainable and highly accessible settlement to Crawley.

2.2.66. The emerging local plan is proposing to allocate the following housing sites on land located within the 5km radius area of search:

- HOR1: Land at Hornbrook Farm, 10.45 hectares (100 homes); and
- HOR2: Land at Mercer Road, 14.3 hectares (300 homes)
- BRH1: South of Lower Broadbridge Farm (Slinfold Parish), 6.3 hectares (133 homes)
- RS1: Land at Rusper Glebe, 0.6 hectares (12 homes)
- RS2: Land north of East Street, 0.9 hectares (20 homes)
- WRN1: Land South of Bell Road, 1.4ha, (20 homes)

2.2.67. This is a total of 585 new dwellings across the plan period and does not include any homes to address Crawley's unmet need.

2.2.68. All of these sites are outside of the HWNL. However, it is notable that HOR1 abuts the boundary with the HWNL and is within an area identified as having no/low capacity for housing development in Horsham's landscape capacity study.



Figure 5 - Allocation HOR1

- 2.2.69. The site is shown in Figure 5 above as being within an area of no/low capacity for residential development. The Council's site assessment notes it "*offers a green buffer between the High Weald AONB and the suburban edge of Horsham but also has a number of landscape detracting elements: the A281 is a busy road artery and Doomsday Lane is also a frequently used route and both lessen the tranquillity of the site and the setting of the AONB.*"
- 2.2.70. The landscape capacity study indicates that HDC considers HOR1 less suitable for residential development than the Application Site. However, it is proposed for allocation despite its location in a no/low capacity area given the identified elements which detract from the landscape. The Application Site has similar characteristics and is in a location of moderate landscape capacity but is not proposed for allocation given its location within the HWNL.
- 2.2.71. There are 34 other sites, both within and outside of the HWNL, located within the 5km area of search, which have been proposed for residential development through the local plan process but were rejected by the planning authority.

Within the HWNL

- 2.2.72. These sites were excluded from further site assessment by HDC given their location within the HWNL. We have reviewed them as alternatives to the Application Site as potential locations for residential development.
- 2.2.73. Site SA033 - Woodland adjacent Beedingwood Farm (Colegate): This is a small (0.35ha) greenfield site on the southern side of Forest Road. It is not adjacent to any settlement boundary and is covered by designated Ancient Woodland. This site has no development potential.
- 2.2.74. Site SA048 - Land south of Forest Road (North Horsham): The site is located adjacent to the built-up area boundary of Horsham to the south of Forest Road. It comprises a mix of garden land and greenfield. The landscape capacity study records the site as being in an area of no/low capacity for residential development and therefore it is less suitable than the Application Site.
- 2.2.75. Site SA088 - Land north of Forest Road (North Horsham): The site is located adjacent to the built-up area boundary of Horsham to the north of Forest Road. It comprises a greenfield with a high degree of tree and vegetation cover. The landscape capacity study records the site as being in an area of no/low capacity for residential development and therefore it is less suitable than the Application Site.
- 2.2.76. Site SA106 - Land at Pine Cottage (Colegate): This is a small (0.26ha) greenfield and garden land site on the southern side of Forest Road within the hamlet of Colegate which is considered a secondary settlement. It is not adjacent to any settlement boundary and is covered by designated Ancient Woodland. The site has a number of trees including a number of mature trees on the road frontage. Colegate is a secondary settlement washed over by the HWNL. Landscape impacts would be greater as a result. Colegate is not as sustainable as Horsham Town and is therefore less suitable than the Application Site.
- 2.2.77. Site SA107 - Land north of Forest Road (Colegate): This site is located on the eastern edge of the boundary with Colegate. The site is completely covered by woodland, with designated Ancient Woodland to the north east corner. It is not considered suitable for development given the loss of biodiversity and woodland. Colegate is a secondary settlement washed over by the HWNL. Landscape impacts would be greater as a result. Further, Colegate is not as sustainable as Horsham Town and is therefore less suitable than the Application Site.
- 2.2.78. Site SA127 - Land at Newhouse Farm (North Horsham): This site comprises the entirety of land included in the previous planning application which was dismissed at appeal. As noted

earlier in this report and elsewhere in the submission, the planning inspector was clear that development on the western field (subject to this Application) was not as harmful as the balance of the site. We consider the western field suitable for residential development as set out in this application.

- 2.2.79. Site SA334 – Land South of Buchan Hill Reservoir (Colgate): The site is located in an isolated rural location and is unrelated to any settlement boundary. It is also covered in vegetation of unknown biodiversity value. The site is considered significantly less suitable than the Application Site.
- 2.2.80. Site SA552 – Woodlands Farm (Colegate): This is a large (3.3ha) greenfield site located in an isolated rural location. It is within the setting of a Grade II listed building with Ancient Woodland located along the southeastern boundary. Highways upgrades would also be required and there is a question relating to 3rd party land ownership. The site is considered significantly less suitable than the Application Site for these reasons.
- 2.2.81. Site SA600 – Wellsprings Blackhouse Road (Colegate): This is a backland site which would include PDL (Wellsprings which would be demolished to create the access) and a greenfield to the rear. It is adjacent to the Colegate Built up area boundary. The need to ensure adjacent residential amenity is protected and the likely preservation of boundary and on site trees and vegetation would limited the potential site density and quantum of development. Colegate is a secondary settlement washed over by the HWNL. Landscape impacts would be greater as a result. Further, Colegate is not as sustainable as Horsham Town and is therefore less suitable than the Application Site.
- 2.2.82. Site SA667 – Rookfield Faygate (Colegate): The site is a 1.4Ha triangular parcel of land immediately to the south of the A264. It is formed of a number of existing buildings and garden land with a large number of trees within the plot. It is within the setting of a Grade II listed building and there are significant constraints in terms of access directly onto the A264 given the speed and volume of traffic on the road. The site is not adjacent to a settlement boundary and is therefore in an isolated location. The site is considered significantly less suitable than the Application Site for these reasons.
- 2.2.83. Site SA670 – Land at Home Farm St Leonards Forest (Colegate): This is a large (27.92ha) greenfield site in an isolated rural location. A Grade II * listed building is within 400m of the site and it abuts the St. Leonards Forrest SSSI with areas of ancient woodland within and surrounding the site. Road capacity upgrades would also be required. The site is considered significantly less suitable than the Application Site for these reasons.

Rejected sites outside the HWNL and within / adjacent to Horsham Town

- 2.2.84. Site SA060 – Land South of Athelstan Way: This is a 4.1Ha greenfield site contiguous to the southern boundary with Horsham. It is a designated local wildlife site, within the setting of Grade II Listed Buildings and would require highways upgrades to deliver. The landscape capacity study records the site as being in an area of no/low capacity for residential development. The site is considered significantly less suitable than the Application Site for these reasons.
- 2.2.85. Site SA298 – Land at Chesworth Farm (Horsham): This is a large site (90Ha) to the south of the Horsham built-up area boundary. There are several constraints including: Horsham Conservation Area within 400m; within setting of Grade II * Listed Chesworth House and various Grade II Listed Buildings; within setting of Chesworth House Medieval Moated Site Scheduled Ancient Monument; flood zone 2 on southern boundary; some surface water flood risk; rare species noted on site; and the likely need for road capacity upgrades. The landscape capacity study also records the site as being in an area of no/low capacity for residential development. The site is considered significantly less suitable than the Application Site for these reasons.

- 2.2.86. **Site SA570 - Land South of Hilliers Garden Centre:** This is a 3.7ha site located to the south of Brighton Road to the rear of Hilliers Garden Centre. The site is not adjacent to the Horsham built-up area boundary. An area of Flood Zone 3 is located near to the southern boundary and there are small pockets of surface water flooding within the site. Ancient Woodland is located on the southern boundary. The landscape capacity study also records the site as being in an area of no/low capacity for residential development. The site is considered significantly less suitable than the Application Site for these reasons.
- 2.2.87. **Site SA785 - Land to the rear of Hawthorns:** This is a small (0.8ha) site of PDL (Hawthorns which presumably would be demolished) and greenfield. The site would produce only a very small quantum of new development so is not directly comparable to the application site. Further, the landscape capacity study also records the site as being in an area of no/low capacity for residential development. The site is considered significantly less suitable for residential development than the Application Site.

Rejected sites outside the HWNL and within the 5km Radius study area

- 2.2.88. **Site SA070 - Land north of Bell Road (Warnham):** This is a 1.8Ha greenfield site adjoining the Warnham settlement boundary to the east. The site is located within setting of Warnham Conservation Area, the Grade I Listed Parish Church of St Margaret, and several other Grade II Listed Buildings. There is a stream running the length of the southeastern boundary located within Flood Zone 3. There are also areas of surface water flood risk present along the aforementioned stream. There are two protected Oak trees within the site and access would also require the removal of protected trees. The landscape capacity study also records the site as being in an area of no/low capacity for residential development. The site is considered significantly less suitable for residential development than the Application Site for these reasons.
- 2.2.89. **Site SA102 - Land North of Lower Broadbridge Farm, Broadbridge Heath:** This is a large greenfield site (12Ha) located to the west of Broadbridge Heath. It is constrained by Grade II Listed buildings on the southern boundary and large areas of Flood Zone 2 and 3 to the west of the site. Potential downstream impacts on the Arun SSSI have been identified. The majority of the site is located within an area of no/low capacity for residential development by the Horsham Landscape Capacity Study. The site is considered significantly less suitable for residential development than the Application Site for these reasons.
- 2.2.90. **Site SA291 - Land West of Kilnwood Vale (Faygate):** The site is a large (15.6Ha) greenfield site west of Kilnwood Vale. There is a small area of Flood Zone 3 in north of site and surface water flood risk to the north and along field boundary edges. The site is within 530m of the House Copse SSSI. It is noted that the site is close to Crawley and would be an extension to the Killnwood Vale strategic site if it were developed. However, it is notable that The Landscape Capacity Study (2021) found the area to have no/low capacity for residential development and the council also identified potential issues with settlement coalescence between Horsham and Crawley and Crawley and Faygate, and infrastructure capacity issues in this part of western Crawley. The application site, given its proximity to Horsham and Crawley and location within an area of moderate landscape capacity, is considered to be a more appropriate site for new residential development.
- 2.2.91. **Site SA295 - Greater Faygate:** This is a very large site (140ha) formed primarily of greenfield land around the designated secondary settlement of Faygate. The promoted site contains three Grade II listed buildings and has surface water flood risk along streams and ditches within the site boundaries. There are numerous areas of Ancient Woodland contained within the site and an Archaeological Notification Area covers much of the northern parcel. The Council's Landscape Capacity Report (2021) assessed the area as having no/low capacity for residential development. Further, given the development north of Horsham and at Killnwood Vale, large scale development at this site, which is located approximately midway between the two schemes, raises significant concerns in terms of settlement coalescence between Horsham and Crawley. The Application Site can deliver residential development in an area considered acceptable for a moderate level of growth in an area

which would not result in any coalescence and significantly less landscape harm, despite its location with the HWNL. The application site is significantly more appropriate for residential development compared to Great Faygate for these reasons.

- 2.2.92. **Site SA420 - Swallowfield Paddock (Mannings Heath):** This is a 1Ha greenfield site located to the south of Mannings Heath. Surface Water Flood Risk covers much of the western portion of the site. TPOs represent a constraint to development. The landscape capacity study also records the site as being in an area of no/low capacity for residential development. It is also separated slightly from the settlement boundary by mature trees / pine plantation and a number of mature trees are located within the site. The site is not considered likely to be developed.
- 2.2.93. **Site SA492 - Land adjacent to Lyons Farm, near Broadbridge Heath:** This is a very large site (40Ha) to the west of Broadbridge Heath. It is located within setting of Grade II Listed buildings on all boundaries. There are also areas of Flood Zone 3 along north, east, and west boundaries, including a significant area to the east. Surface water flood risk is located along drainage ditches and other small patches within site. The landscape capacity study also records the majority of the site as being in an area of no/low capacity for residential development. This is largely on account of the open and rural character of the site which does not relate well to the existing built form of Broadbridge Heath. Further, the proposal for large scale development is considered to result in a perception of urban sprawl and would erode the rural gap between Broadbridge Heath and Slinfold. The application site is significantly more appropriate for residential development compared to land at Lyons Farm for these reasons.
- 2.2.94. **Site SA564 - Land to the east of Tuggles Plat (Warnham):** This is a small greenfield site of under 1ha on the southern boundary of Warnham. The site is within setting of Warnham Conservation Area, and several Grade II Listed Buildings. The loss of the open space is considered to have a significant impact on the setting of the Conservation Area. The landscape capacity study notes the site is in an area of low / moderate capacity. The application site is more appropriate for residential development for these reasons.
- 2.2.95. **Site SA598 - Millfield Farm Buildings (Rusper):** This is a large greenfield site to the south east of Rusper. The site is located in close proximity to Rusper Conservation Area and within the setting of Grade II Listed buildings. The Grade I Listed Parish Church of St Mary Magdalene lies within 300m. Ancient woodland is adjacent to the site. The Council's Landscape Capacity Assessment Report (2021) assessed part of the site and found it to have low-moderate capacity for small-scale housing development. Development of the land would not relate well to Rusper's linear settlement form and would result in development that relates poorly to the existing settlement. There is no defensible landscape boundary, which would be visually intrusive with long views into the open, wider countryside. The site is not considered likely to deliver residential development given the identified constraints.
- 2.2.96. **Site SA621 - Land at Hawkesbourne Farm (Rusper):** This is a greenfield site which is isolated at present but adjoins the North Horsham Strategic Area. The Council's Landscape Capacity Study (2021) has found the site to have no/low capacity for residential development. The Council's assessment considers that some small scale development could take place but not within the emerging plan period given it relies on delivery of the strategic allocation. The site is not considered likely to deliver any residential development for several years. The application site can deliver a meaningful contribution to meeting housing need within the next five years.
- 2.2.97. **Site SA630 - Land West of Baldhorns Copse (Rusper):** This is a 1Ha greenfield site to the south of Rusper. There is Surface water flood risk present across much of the site with the river mole adjacent to much of the eastern boundary of the site. Ancient woodland is located along the eastern boundary. The provision of the necessary 15m buffer would consume most of the site. It is within the setting of Grade II listed buildings. The landscape capacity study notes the site is in an area of low / moderate capacity. There are a number of constraints that would severely limit any development from being delivered on this site.

- 2.2.98. **Site SA684 - Land at Woolmers (Mannings Heath):** This is a 6Ha site on the west of Mannings Heath formed of PDL and greenfield land. There are areas of woodland within the site, and it sits just beyond the buffer zone of ancient woodland to the south west. A grade II listed building is within 100m of the site. The landscape capacity study also records the site as being in an area of no/low capacity for residential development. Significant landscape impacts are identified given development would have an adverse impact upon the rural character and appearance of Rusper. The Application Site by contrast is a logical extension to the most sustainable settlement in the district and is therefore considered a more suitable site for residential development.
- 2.2.99. **Site SA737 - Pucks Croft Cottage and Land South (Rusper):** This is a small site to the south of Rusper within an area considered to have low / moderate capacity for residential development in the landscape capacity study. It is within 200m of a Grade II listed building and has surface water flood risk at the access to and centre of the site. The site is proposed for a very small amount of housing so is not directly relevant to the application site. However, it is noted that the potential arboriculture and biodiversity constraints could limit development further or ultimately prevent any from coming forward.
- 2.2.100. **Site SA738 - Land east of Baldhorns Copse (Rusper):** This 4Ha greenfield site is located to the south of Rusper within an area considered to have low / moderate capacity for residential development in the landscape capacity study. The site is heavily wooded with ancient woodland is present in the western portion of the site. There are also third-party land ownership issues which may not be able to be addressed. The site is also separate from the existing settlement boundary. The site has significant biodiversity constraints and is not considered suitable for residential development.
- 2.2.101. **Site SA745 - Land east of Ghyll Manor (Rusper):** This is a large (9.7Ha) greenfield site to the east of Rusper. The site is within the setting of Rusper Conservation Area, the Grade I Listed Parish Church of St Mary Magdalene, and various other Grade II Listed buildings. There is some surface water flood risk at the site and it is noted that upgrades to the local highway network would be needed to support any development. The landscape capacity study also records the site as being in an area of no/low capacity for residential development. Development is unlikely to come forward given the site does not relate well to the existing built form of Rusper and would create a large scale urbanised intrusion into the wider open landscape, unconnected from the existing settlement form. The Application Site by contrast is a logical extension to the most sustainable settlement in the district and is therefore considered a more suitable site for residential development.
- 2.2.102. **Site SA752 - Land at Bensons Farm (Rusper):** This is a very large (18.7Ha) greenfield site within the countryside outside the built-up area boundary of Horsham. Though currently isolated from Horsham, the site adjoins and lies partially within the Land North of Horsham strategic allocation. The Council's Landscape Capacity Study (2021) has found the site to have no/low capacity for residential development, with the exception of the site area that is sited within the existing allocation. Similarly to SA621, The Council's assessment considers that some small scale development could take place but not within the emerging plan period given it relies on delivery of the strategic allocation. However, it further concludes that given the site is on higher ground it would have significant landscape impacts if it were developed, regardless of the location of the strategic site. Therefore, it is unlikely development will come forward at this site, and if it does it will be in a number of years. The application site can deliver a meaningful contribution to meeting housing need within the next five years.
- 2.2.103. **Site SA753 - Land at Kings Farm (Rusper):** This is a small greenfield site to the north of the A264, on land contiguous to Land North of Horsham Allocation. It contains and is adjacent to Grade II listed buildings and has areas of surface water flood risk around the stream to the northern site boundary. The Council's Landscape Capacity Study (2021) has found the site to have no/low capacity for residential development. Similarly to SA752, the Council's site assessment considers that development on this land which rises to the north to the extent envisaged would be visually intrusive and have significant landscape impacts. Therefore, it is unlikely development will come forward at this site, and if it does it will be in a

number of years. The application site can deliver a meaningful contribution to meeting housing need within the next five years.

- 2.2.104. Site SA766 - Lower Broadbridge Farm, Broadbridge Heath: This is 4.5Ha of PDL to the west of Broadbridge Farm. It is located within the setting of Grade II Listed buildings and there are areas of surface water flood risk in the site. Most of the site is in an area the landscape capacity study considers has moderate capacity with the western extent having no/low capacity. It is within the setting of Grade II listed buildings and areas of flood zone 2 around a pond. The site is significantly constrained by its proximity to existing commercial uses to the east and south which would make it unsuitable for residential development. The site is therefore unlikely to come forward for residential development without a corresponding change in surrounding land uses.
- 2.2.105. There are a number of sites proposed within and outside of the HWNL within a 5km radius of the application site which could be allocated to help HDC increase its housing land supply and address some of Crawley's unmet housing need. However, it is clear from the site assessments that the land previously promoted to HDC as part of its emerging local plan process is unlikely to yield much, if any, suitable locations for new residential development.
- 2.2.106. The application site is clearly the most appropriate of all sites put forward within the HWNL. Further, it performs better against all the sites in the search radius considered above.
- 2.2.107. It is evident from the emerging local plan that HDC recognises the necessity of delivering increased housing land following the withdrawal of the Natural England position statement and the commitment to meet half of Crawley's unmet need. In this context, we have reviewed relevant nearby sites as identified in the council's SHELAA (other than those already proposed for allocation) to consider alternative locations for the development to meet the housing need in 'some other way', as per Paragraph 190 (b).
- 2.2.108. The Council cannot dismiss proposed sites because they are located within the HWNL. Exceptional circumstances exist that support the development of the application site. There is no available evidence that the identified need can exclusively be provided outside the designated area, or that the need can be met in some other way.

(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated;

- 2.2.109. The outline application submission is supported by a Landscape and Visual Impact Assessment prepared by Fabrik. The document concludes that *"the key characteristic features / components of character associated with the High Weald that are present within the Site will be predominantly retained and enhanced through the provision of the green infrastructure as proposed."*
- 2.2.110. We consider that a review of relevant local planning policy and the High Weald Management Plan are appropriate when considering potential compliance with Paragraph 190 (c).
- 2.2.111. HDPF Policy 30 considers 'Protected Landscapes' and states:
1. *"The natural beauty and public enjoyment of the High Weald AONB and the adjoining South Downs National Park will be conserved and enhanced and opportunities for the understanding and enjoyment of their special qualities will be promoted. Development proposals will be supported in or close to protected landscapes where it can be demonstrated that there will be no adverse impacts to the natural beauty and public enjoyment of these landscapes as well as any relevant cross boundary linkages.*
 2. *Proposals should have regard to any management plans for these areas and must demonstrate*

- a. *How the key landscape features or components of natural beauty will be conserved and enhanced. This includes maintaining local distinctiveness, sense of place and setting of the protected landscapes, and if necessary providing mitigation or compensation measures*
 - b. *How the public enjoyment of these landscapes will be retained*
 - c. *How the proposal supports the economy of the protected landscape and will contribute to the social wellbeing of the population who live and work in these areas.*
 3. *In the case of major development proposals in or adjoining protected areas, applicants will also be required to demonstrate why the proposal is in the public interest and what alternatives to the scheme have been considered."*
- 2.2.112. There will be landscape and visual harm arising from the proposed development as there would be with the development of any green field site. However, these effects are limited to the soils and land use of the site and for those in the locality with views of the existing field.
- 2.2.113. The Site lies wholly within, but on the edge of the High Weald National Landscape. The LVIA submitted in support of this application demonstrates that, with the exception of the field parcel, the key characteristic features / components of character associated with the High Weald that are present within the Site will be predominantly retained and enhanced through the provision of the green infrastructure as proposed.
- 2.2.114. The scale and layout of the proposed development (comprising up to 120 dwellings) has been carefully considered and falls at the lower end of the Horsham District Council capacity for 'medium scale development' (100-500 dwellings). It is noted that the Council has already determined that the site's location has the capacity for 'medium scale development'
- 2.2.115. The proposal has also evolved in consideration of the Inspectors commentary on the dismissed appeal for a larger development proposal. The proposed development will not breach any defensible boundary such as a road or woodland and would not extend any further north or east than the existing or emerging new settlement edge. Further, the application proposes a significant amount of new woodland planting to the north west of the site and to the boundaries. Additional infill planting can also be delivered on the eastern side of The Birches to increase tree coverage and provide additional enhancements to biodiversity.
- 2.2.116. There are opportunities to enhance public enjoyment of the space through the potential for a footpath link through the woodland to the east (The Birches) which would connect to an existing footpath which provides further links into the HWNL. It would also provide links to the adjacent allotments and the play area to the south east.
- The High Weald Management Plan*
- 2.2.117. The High Weald Management Plan is prepared by the High Weald Joint Advisory Committee (JAC), a partnership which includes 15 local authorities covering the area together with community, environment and land-based sector representatives. The Plan is reviewed every five years with the latest covering the period 2024 – 2029.
- 2.2.118. The High Weald AONB Management Plan provides a set of objectives for each identified component of natural beauty that represent the agreed long term aims for the HWNL. The achievement of these aims will ensure that the purpose of designation is achieved, and the landscape is conserved for future generations.
- 2.2.119. The impact of the proposed development on the National Landscape is judged using the Management Plan objectives. This is summarised below.

Natural Systems – Geology, Landform, Water Systems and Climate

- G1: To restore the natural function of rivers, water courses and water bodies.
 - G2: To protect landform and geological features including sandstone outcrops.
 - G3: To pursue net zero across the High Weald without compromising its characteristic landscape beauty.
 - G4: To restore soil health across the High Weald.
- 2.2.120. The Management Plan notes that the National Landscape is *"a deeply incised, ridged and faulted landform of clays and sandstone with highly variable, relatively undisturbed soils and numerous headwaters (gill streams) functioning under an oceanic climate."*
- 2.2.121. The landscape of the existing site is a single agricultural field which gently slopes down from the south to the north. There are no ridgelines, gill streams or rivers within the site. This special quality would therefore not be affected by the proposed development.
- 2.2.122. The proposal includes an area for water attenuation which would take the form of a large basin (or pond) which is appropriate and characteristic of the wider National Landscape.
- 2.2.123. The proposed development will result in the removal or displacement of the existing soil relative to the development parcels and as such alter this special quality or component of character.

Settlement

- S1 - To protect the historic pattern and character of settlements.
 - S2 - To enhance the architectural quality of the High Weald and ensure new development reflects the character of the High Weald in its siting, scale, layout and design.
 - S3 - To conserve the distinct built heritage of the High Weald.
- 2.2.124. In terms of settlement, the NL is described as *"dispersed historic settlement including high densities of isolated farmsteads, hamlets and late-medieval villages founded on trade and non-agricultural rural industries."*
- 2.2.125. The site is on the north eastern edge of the Horsham Settlement Boundary. Mid to late twentieth century development resulting from the relatively recent expansion of Horsham characterises the nearby urban edge. The site is also heavily influence by the nearby transport network including A264 and railway line.
- 2.2.126. There are no buildings within the site itself. There are relatively modern farm buildings to the north of the site at New House Farm. A landscape gap would be maintained between the site and the farm to the north.
- 2.2.127. The proposed development will not therefore alter the existing dispersed arrangement of farmsteads and hamlets.

Routeways

- R1 - To maintain the historic pattern, morphology and features of routeways.
 - R2 - To protect and enhance the ecological function of routeways.
- 2.2.128. The management plan states that the NL has *"a dense network of historic routeways (now roads, tracks and paths)."*
- 2.2.129. There are no Public Rights of Way which would be affected by the development.

- 2.2.130. Some vegetation to the western boundary would be lost to form the site access. This would be mitigated by a landscape and ecology design to ensure an overall 10% net gain in biodiversity.
- 2.2.131. Crawley Road already functions as a settlement-edge route and is influenced by development on both sides of the road. It is outside of the HWNL designation though is within the setting.
- 2.2.132. The informal paths around the perimeter of the Site indicates that the Site has been unlawfully used by the public. There is an opportunity to retain circular walking routes around the field parcels within the proposed development, and within the proposed area of public open space.

Woodland

- W1 - To maintain and restore the existing extent and pattern of woodland cover and particularly ancient woodland.
 - W2 - To protect and restore the ecological quality and functioning of woodland at a landscape scale.
 - W3 - To protect the archaeology and historic assets of AONB woodlands.
 - W4 - To increase the output of sustainably produced high-quality timber and underwood for local markets.
- 2.2.133. There is no designated Ancient Woodland within or adjacent to the pre-application site.
- 2.2.134. The Site lies to the immediate west of The Birches woodland. The development proposes areas of green infrastructure which allow the opportunity for new woodland belt planting, including to the Birches itself. This will enhance landscape connectivity and provide an enhancement to this special quality of the NL.

Fieldscape and Heath

- FH1 - To secure agriculturally productive use for the fields of the High Weald, especially for local markets, as part of sustainable land management.
 - FH2 - To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.
 - FH3 - To protect and enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.
 - FH4 - To protect individual archaeological features as well as historic assets and pattern of fields and heath.
- 2.2.135. The Site comprises a regularly shaped and single field unit which is currently laid to grass. It is bounded by hedgerows and tree belts along the site boundary. The loss of a singular field is not considered significant in terms of the wider NL.
- 2.2.136. Further, the framework of vegetation provided by the hedgerows and tree belts would be retained and supplemented as part of the green infrastructure proposals.
- 2.2.137. It is also noted that the site is very well screened from longer views from the south and east by a combination of existing development and the Birches. This screening will be enhanced by the proposed boundary planting to the north and western site edges.

- 2.2.138. Further, the potential impact must be balanced against the significant weight afforded to the delivery of new housing in the district. The application also includes ecological work which will deliver a suite of biodiversity enhancement and mitigation measures. This will ensure that the ecological function of the site is maintained and, where possible, enhanced.
- 2.2.139. An archaeological desk-based assessment supports the planning application to ensure the proposed development is appropriately informed of the potential for buried heritage assets. Any potential loss would be mitigated through appropriate preservation through record or preservation in situ which accords with the advice contained in the NPPF.

Dark Skies

- DS1 - To preserve the dark skies of the High Weald AONB by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial and public premises in both existing and new developments within the High Weald, and from highways lighting.
 - DS2 - To protect wildlife and habitats from light pollution across the High Weald.
- 2.2.140. The Site is in an edge of settlement location adjacent to existing residential development and street lighting on Crawley Road. The A264, some 170 metres to the north is also lit by street lighting. This sets a higher baseline in terms of existing lighting levels compared to a more remote location within the HWNL.
- 2.2.141. Nevertheless, a suitable lighting design strategy would support a future Reserved Matters application to limit external sources of light to levels appropriate to this transitional location from the edge of Horsham into the HWNL. Ecological work also considers the presence of bats and other relevant species to inform the lighting design strategy.

Aesthetic and Perceptual Qualities

- PQ1 - To increase opportunities for learning about and celebrating the High Weald's character and aesthetic qualities, and to promote and facilitate contributions by communities and individuals to the conservation and enhancement of the High Weald.
 - PQ2 - To protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity.
 - PQ3 - To foster and promote equitable access and informal enjoyment of the High Weald landscape and the integrated management of its resources for the enjoyment of natural beauty by all.
- 2.2.142. The proposal does not directly contribute to the delivery of these objectives. However, it is noted that the archaeological investigation would be a matter of public record and will add some further knowledge of the historic past of the site and its immediate surroundings. Further, the aesthetic and perceptual qualities of the HWNL in this location are already influenced by the proximity of Horsham and associated adjacent development on the settlement edge.
- 2.2.143. The rural landscape will change as a result of development, and this is covered elsewhere in this report. The sense of tranquillity will not significantly alter, considering the existing influences from the adjacent settlement and transport infrastructure.

Land based Economy and Rural Living

- LBE1 - To improve returns from, and thereby increase entry and retention in, farming, forestry, horticulture and other land management activities that conserve and enhance natural beauty.
- LBE2 - To reconnect settlements and residents with the surrounding countryside, and maintain and improve rural amenities and services that support communities within the context of the rural settlement pattern.
- LBE3 - To improve agricultural and forestry infrastructure (including the provision of appropriate affordable housing and workspaces for land-based workers), along with skills development for rural communities and related sectors that contribute positively to conserving and enhancing natural beauty.

- 2.2.144. As noted above, the site is not used intensively or actively for farming / agriculture for some time and cannot be considered a contributor to the rural economy.
- 2.2.145. The site is also on the edge of a major town and is not considered part of the wider rural settlement pattern of the HWNL.
- 2.2.146. The site will not deliver workspaces or housing specifically for rural or land-based workers. However, it will be policy compliant in the delivery of affordable housing which will have a positive impact on house prices affordability for lower income workers in the HWNL.
- 2.2.147. The assessment of the AONB objectives against the proposals included above demonstrates that the High Weald AONB Management Plan objectives are met by the proposals and there is no conflict between them that would result in harm to the HWNL.

Positive Contributions and Enhancement Measures

- 2.2.148. The proposed development offers significant and demonstrable benefits that contribute positively to the local context and align with national policy objectives including the requirements to further the purposes of the National Landscape and demonstrating that the proposal is in the public interest. These benefits, outlined below, are achieved through careful site selection and design and support the justification for development in this location and contribute positively to the planning balance.

Enhanced Affordable Housing Provision

- 2.2.149. **Delivery of 45% affordable housing** which is above that currently required by local policy. This significantly contributes to meeting the identified local need for accessible and affordable homes.

Substantial Green Infrastructure and Ecological Enhancement

- 2.2.150. **Extensive Woodland Buffer Planting:** A significant area will be dedicated to new woodland buffer planting. This will create a substantial ecological buffer to the adjacent woodland.
- 2.2.151. **Habitat Connectivity and Enhancement:** This new planting will strategically link existing woodland habitats and enhance boundary vegetation, creating valuable ecological corridors and improving the overall ecological network within the landscape.
- 2.2.152. **Significant Public Open Space Provision:** A defined proportion of the site, approximately 35% of the total site area, will be retained as accessible public open space for the enjoyment of residents and visitors.
- 2.2.153. **Biodiversity Net Gain (BNG):** The development is designed to achieve a significant uplift in biodiversity, delivering a minimum of 43.77% biodiversity net gain, contributing positively to local wildlife and ecological resilience.

Potential for Enhanced Public Access and Woodland Enjoyment

2.2.154. Subject to further detailed investigations programmed for Spring 2026 and subsequent ecological assessments, there is potential to deliver:

- Improved pedestrian links through the adjacent woodland, potentially connecting to existing public rights of way or creating new informal routes.
- Enhancements to the ecological health and public accessibility of the existing woodland.
- Increased buffer planting to the eastern side of the existing woodland to further bolster its ecological function and resilience.

2.2.155. These benefits collectively demonstrate a commitment to high-quality development that not only meets urgent housing needs but also actively conserves and enhances the local environment, creates new amenities, and improves landscape connectivity and biodiversity.

3. Conclusion

- 3.1. The National Planning Policy Framework makes clear that major development within a National Landscape should only be permitted where exceptional circumstances exist and where the development is demonstrated to be in the public interest. Paragraph 190 requires a balanced consideration of the need for development, the availability of alternative locations outside the designation, and the extent of any environmental or landscape harm.
- 3.2. This report demonstrates that exceptional circumstances clearly exist in Horsham District. The Council is currently experiencing a severe and persistent housing land supply shortfall, with only 1.7 years of deliverable housing land against the required five-year supply. This situation has been compounded by the prolonged impacts of water neutrality restrictions and the continued delay in adopting a new Local Plan. As a result, both market and affordable housing delivery in the district has fallen significantly below identified need. The provision of new homes, including policy-compliant affordable housing, therefore carries substantial weight in the planning balance.
- 3.3. The evidence also demonstrates that the Application Site represents a logical and sustainable opportunity to contribute towards addressing this shortfall. Horsham Town is the most sustainable settlement in the district and is located in close proximity to Crawley, where substantial unmet housing need persists. The site lies immediately adjacent to the existing settlement edge and within an area identified by the Council's own Landscape Capacity Study as having moderate capacity for residential development. In contrast, the review of alternative sites demonstrates that other locations within the defined search area are either significantly constrained, less sustainable, or unlikely to deliver housing within a meaningful timeframe.
- 3.4. In landscape terms, while the Site lies within the High Weald National Landscape, it occupies a transitional edge-of-settlement location influenced by the existing urban area and nearby transport infrastructure. The submitted Landscape and Visual Impact Assessment confirms that the key characteristics of the High Weald can be largely retained and enhanced through the proposed green infrastructure framework. The scale and extent of development has been carefully limited to up to 120 dwellings, responding directly to previous appeal findings and ensuring that development remains closely related to the existing settlement edge without extending further into the wider National Landscape.
- 3.5. The assessment of the High Weald Management Plan objectives further demonstrates that the proposals would retain and enhance important landscape features, deliver biodiversity enhancements, and provide opportunities for improved public access and recreation. Any limited landscape change associated with the loss of a single agricultural field would be moderated through landscape mitigation, structural planting, and sensitive design.
- 3.6. When considered against the tests set out in Paragraph 190 of the NPPF, the following conclusions are drawn:
 - There is a clear and pressing need for new housing, including affordable housing, within Horsham District.
 - There is no clear evidence that this need can be met solely outside the National Landscape, particularly in locations close to Horsham and Crawley where development would be most sustainable.
 - Any environmental and landscape effects arising from the proposal would be localised and capable of effective mitigation, with the overall character and qualities of the High Weald largely retained.
- 3.7. Further, as noted in the introduction, the following matters are material to the existence of exceptional circumstances:

- **Severe Housing Need:** Horsham District faces a critical housing land supply deficit (1.7 years vs. 5-year requirement), significantly impacting the delivery of both market and affordable housing. There is also a substantial unmet housing need from Crawley Borough that Horsham is expected to help address.
 - **Critical Affordable Housing Delivery Gap:** Beyond the overall housing land supply deficit, Horsham District faces a chronic and deep-seated failure to deliver sufficient affordable housing to meet identified needs. This persistent undersupply, recognised as a significant factor carrying substantial weight in planning considerations, constitutes a distinct exceptional circumstance.
 - **Sustainability and Strategic Location:** Horsham Town is identified as the most sustainable settlement in the district and is strategically located less than 5km from Crawley, making it an appropriate focus for development and a logical location to address cross-boundary need.
 - **Inadequacy of Alternatives:** An exhaustive review of alternative sites within and outside the High Weald National Landscape shows that most are either significantly more constrained (landscape, ecology, flood risk, access), less sustainable, or unlikely to deliver housing in the short-to-medium term compared to the proposed site.
 - **Site Suitability and Edge Location:** The proposed site is located on the edge of Horsham Town, within an area identified by the Council's own Landscape Capacity Study as having moderate potential for residential development. It is already influenced by existing urban development and transport infrastructure, meaning its 'National Landscape' character is less intrinsic than deeper within the designation.
 - **Landscape and Environmental Enhancement:** The development is designed to retain key landscape characteristics and actively enhance the environment. It includes extensive new woodland planting, delivers substantial Biodiversity Net Gain, provides dedicated public open space, and creates crucial habitat connectivity, thereby conserving and improving the High Weald environment and exceeding relevant management objectives.
 - **Demonstrable Public Interest through Comprehensive Benefits:** The proposed development demonstrably serves the public interest by addressing critical housing needs and delivering a comprehensive package of significant positive contributions. These include exceeding affordable housing targets, substantial environmental enhancements through extensive woodland planting and biodiversity gains, dedicated provision of public open space, and potential for improved public access and woodland ecology, ensuring the overall benefits strongly justify the proposal.
- 3.8. Accordingly, the proposal represents a sustainable and carefully considered extension to the settlement of Horsham, capable of delivering much-needed homes in a highly sustainable location. The development would contribute meaningfully towards addressing the district's housing shortfall while ensuring that the defining characteristics of the High Weald National Landscape are conserved and enhanced where possible.
- 3.9. For these reasons, it is concluded that exceptional circumstances exist and that the proposed development is demonstrably in the public interest, satisfying the requirements of Paragraph 190 of the National Planning Policy Framework.

