

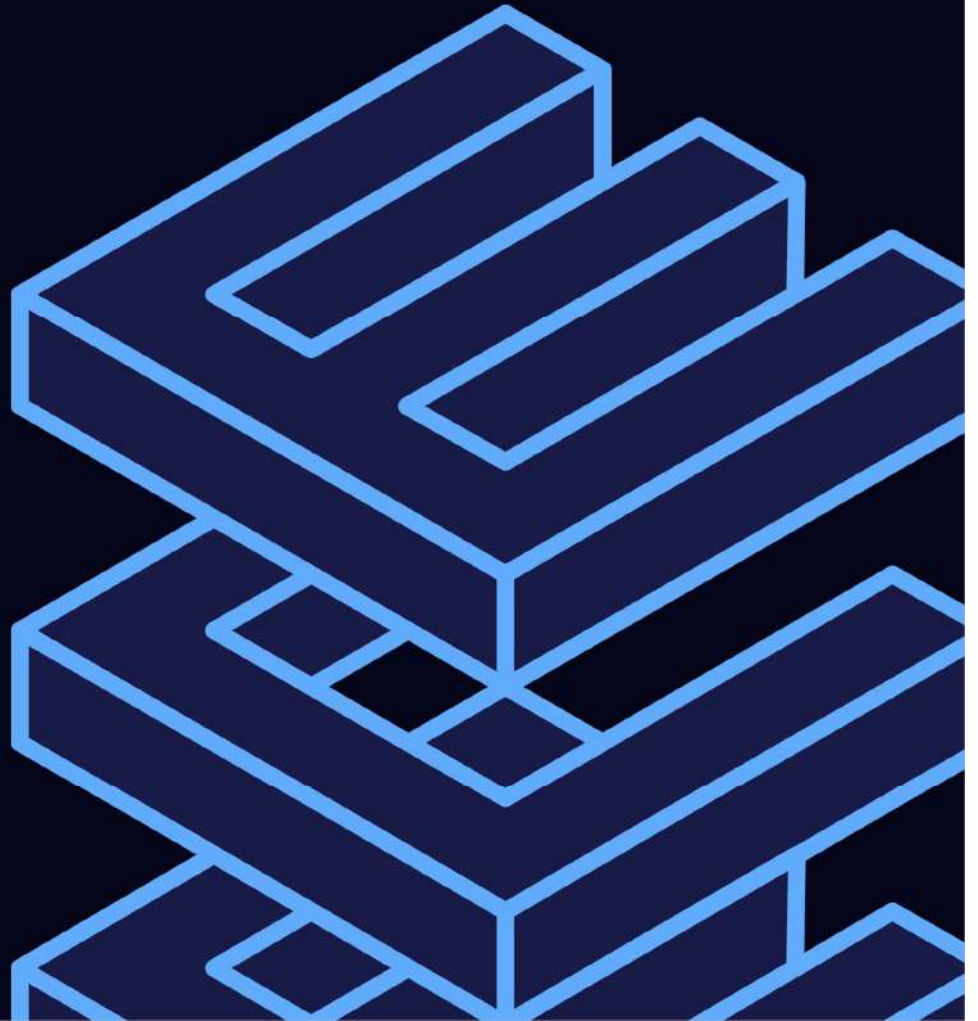


ECE Planning

Planning Statement

Land off Crawley Road,
Horsham

April 2026



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1. Introduction

- 1.1. This Planning Statement is prepared by ECE Planning on behalf of our client, FCP Land 4 Ltd, in support of an application for outline planning permission for the following:

"Development of up to 120 dwellings (including 45% affordable) with all matters reserved except for access."

- 1.2. A list of drawings and reports which support this application is set out in the accompanying covering letter.
- 1.3. The site is located within the High Weald National Landscape (HWNL), albeit on the western edge of the protected area on the urban fringe of Horsham Town. The proposed development of up to 120 dwellings is considered 'major' in planning terms and is therefore supported by a separate report setting out the exceptional circumstances relating to the application including why the application within the protected landscape should be approved.
- 1.4. This Planning Statement considers the compliance of the scheme with relevant local and national policy with reference to the exceptional circumstances report were relevant. It also provides a description of the development proposed and considers the planning policy context before reviewing each of the relevant material considerations to the determination of the application.

2. The Site

- 2.1. The site is located to the south of Old Crawley Road and east of Crawley Road (B2195) on the edge of the built-up area boundary of Horsham.
- 2.2. The overall site area extends to approximately 4.9 Hectares and is shown within the red edge on the location plan extract in Figure 1 below:

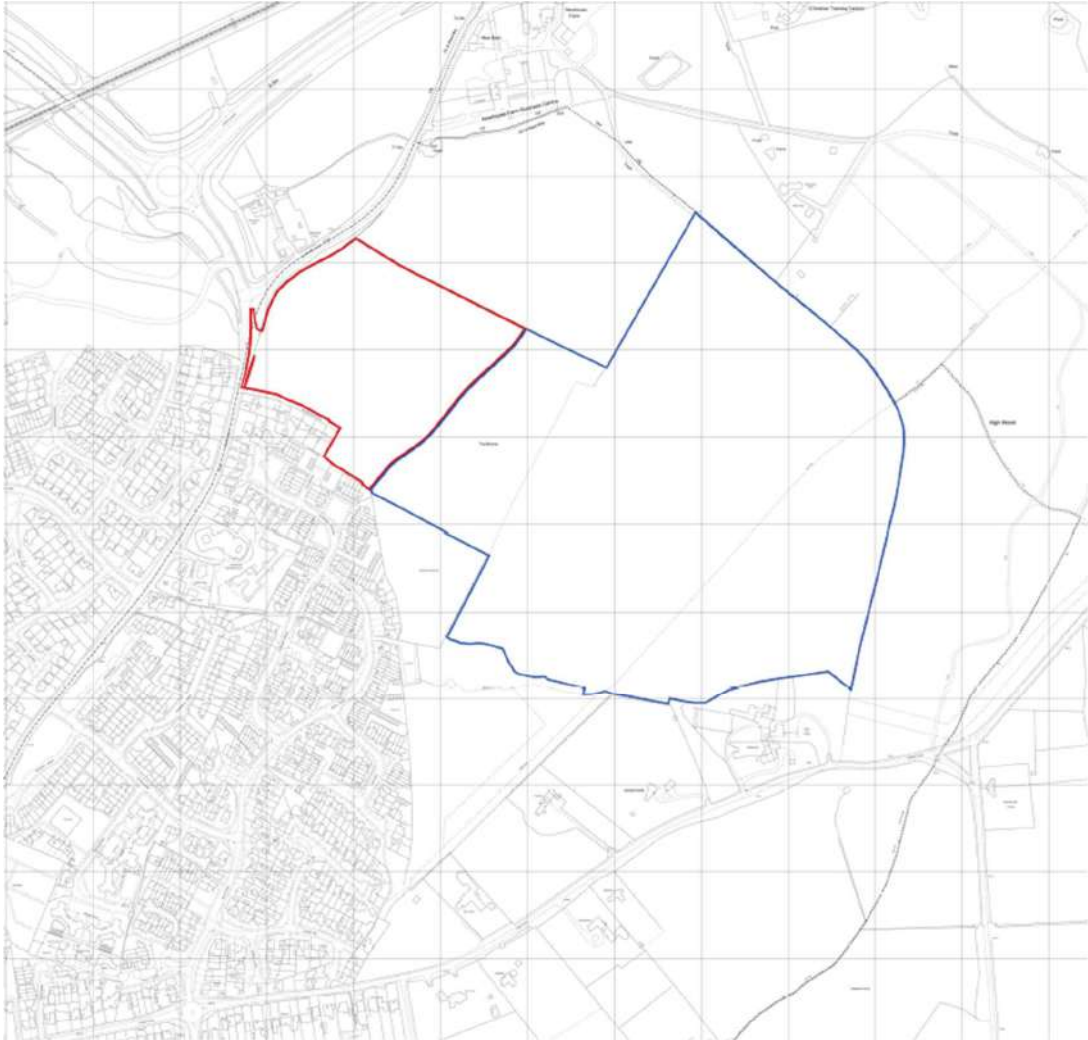


Figure 1 - Location Plan

- 2.3. The site comprises one agricultural field which falls gently from the southeast to the west / northwest. Its western boundaries are defined by the B2195 and Old Crawley Road. The southern boundary is formed of several residential dwellings on New Moorhead Drive and The Larches, which front onto the Application Site.
- 2.4. The eastern boundary abuts a woodland area known as The Birches. Agricultural fields are located beyond the northern boundary of the site toward the commercial buildings at New House Farm.
- 2.5. The southern boundary of the site abuts the built-up area boundary as illustrated in Figure 2 below:



Figure 2 - Application Site and Built up Area Boundary

- 2.6. The site is located within the High Weald National Landscape (HWNL). The boundary of the HWNL (shown by the green vertical lines in **Error! Reference source not found.** below) adjoins the built-up area of Horsham.
- 2.7. Allotment gardens are located to the south east of the site, south of The Birches. There are no Public Rights of Way (PRoW) within the site. A footpath runs alongside the eastern boundary of The Birches which connects with route NOH 3571 to the south. This route provides a connection with NOH 1587 to the east.
- 2.8. Trees and hedgerows are located on the northern, western and southern boundaries.
- 2.9. The site is not within a Conservation Area and does not contain Ancient Woodland or Tree Preservation Orders. The Site is located within Flood Zone 1 and is not at risk from surface water flooding.
- 2.10. The site is well located in terms of services with a range of local amenities available in Roffey within a 2km walk of the site. The nearest bus stops are some 330m from the site on the B2195 which offer services into Horsham town centre (west bound) and destinations to Crawley (east bound).
- 2.11. The A264 Crawley Road is some 270m from the proposed site access which provides a direct route to Crawley some 4.5km to the east. Crawley Road to the south provides a direct route into Horsham Town Centre.



Figure 3 - High Weald National Landscape Boundary

3. Planning History

- 3.1. The site formed part of application DC/20/0470 for the following development:
"Outline application for the erection of 473 dwellings, with new access provided off the Crawley Road, plus associated areas of open space and landscaping. All matters reserved apart from access."
- 3.2. The application was refused on 29th July 2020 and subsequently appealed under reference PP/Z3825/W/21/3266503. The appeal was dismissed on 30th July 2021 following a public inquiry.
- 3.3. The site subject to this pre-application submission formed the western most field of this much larger application which included the large fields to the east of The Birches. This is shown on the masterplan from the dismissed appeal in Figure 4 below:



Figure 4 - Dismissed Appeal Masterplan

- 3.4. It is notable that the Inspector's conclusions of harm in the dismissed appeal related particularly to the "eastern field" which they found reflected the "qualities of the wider AONB". The inspector's report found on several occasions that development of the western field would result in much more limited 'harm'. This is discussed further in this statement.
- 3.5. The site subject to this pre-application query does not include any land considered "the eastern field" in the appeal decision.

Pre-application – October 2025 (Reference PE/25/0157)

- 3.6. The applicant sought pre-application advice from the Council in 2025 on the proposed scheme for up to 120 dwellings on the western field.
- 3.7. The pre-application response noted that the proposals represent an "appropriate level of expansion to the main settlement of the District, would assist with meeting local housing

need, adjoin an existing BUAB and would not compromise long-term development. " This is in relation to five tests set out in the Shaping Development in Horsham District Planning Advice Note (SD PAN) which has been adopted by the Council to facilitate new development in the district in the absence of an up to date local plan or five year housing land supply.

- 3.8. The last test relates to landscape impacts. The pre-application response notes that "*Crucial to any support afforded by the SD PAN, therefore, is considered to be the extent to which the proposals can be said to be made within an existing defensible boundary and to maintain and/or enhance landscape features.*"
- 3.9. The landscape officer response to the pre-application acknowledged the conclusions of the council's landscape capacity study, though considered that landscape harm remains.
- 3.10. The pre-application concluded that "*while it is recognised that the proposals would result in a lesser degree of landscape harm than the preceding appeal proposals it remains the view of the Council that no exceptional circumstance(s) exist to justify major development within the HWNL as a protected landscape.*"

Public Consultation – 2026

- 3.11. Residents and other important local stakeholders were given the opportunity to submit feedback regarding the proposals during a public consultation which commenced on 5th February 2026, finishing on 1st March 2026.
- 3.12. A freephone information line along with a project email address were both made available throughout the process for interested parties to receive further details and to provide feedback. Additionally, a virtual consultation was hosted on the project website, <https://faygate.your-feedback.co.uk>, which provided more details about the vision and included a portal where visitors could submit their views by completing an online feedback form.
- 3.13. The website was promoted with a community flyer, which also included details on how residents and other important local stakeholders could request paper copies of the plans along with a feedback form and return postage if they were unable to access the internet. This was to ensure everyone was able to comment who wished to do so.
- 3.14. During the consultation period, we received a total of 205 responses. It comprised 185 feedback forms completed via the project website, and 20 emails.
- 3.15. Further details on the consultation process can be found in the Statement of Community Involvement submitted in support of this application.

4. The Proposal

- 4.1. Outline planning permission is sought for the construction of up to 120 residential dwellings (45% of which would be affordable housing), with all matters reserved except for access.
- 4.2. Vehicular and pedestrian access would be provided via a single point of connection onto Crawley Road. This would include a 4m wide exit lane out of the site to accommodate traffic turning left and right. A right turn lane into the site would also be provided on the Crawley Road.
- 4.3. An illustrative layout is submitted to demonstrate how development parcels can be sensitively located to minimise effects on the existing vegetation and local visual receptors. This includes the provision of green buffers to the southwest, northwest and north of the site accordingly.
- 4.4. Woodland planting and green open space are proposed to the northwest of the site, north of the access road, to both provide open views when seen from Crawley Road, and offer screening from longer range views and users of Old Crawley Road to the northwest. This will filter views of the proposed development over time from the surrounding landscape, whilst also providing habitat connectivity with the existing trees and woodland to the east of the site.
- 4.5. Planting to the south of the main access would complement the woodland to the north to create a green gateway, providing visual and physical enclosure and connection with the network of existing and proposed trees and woodland.
- 4.6. Space within the development parcels is provided for play areas and tree planting is proposed to the internal site roads to soften the streetscape and enhance biodiversity.
- 4.7. Further structural planting would take place to existing western and northern boundaries to fill any existing gaps. A 15m fenced buffer zone would be provided adjacent to the existing woodland of The Birches to the east of the Site. The buffer zone will include wildflower meadow, scrub habitat and larger native trees closest to the woodland habitat to create graded ecotone and enhance biodiversity.
- 4.8. A surface water drainage basin is located to the west of the site to the north of the proposed entrance. This will allow the site to positively drain using a gravity system.
- 4.9. The proposal would provide up to 120 residential homes, 45% of which would be affordable. The proposed housing mix is shown below:

Bedrooms	Number
1 Bed	8
2 Bed	49
3 Bed	33
4 Bed	30
Total	120

Table 1 - Schedule of Accommodation

4.10. The illustrative layout is shown below:



Figure 5 - Illustrative Layout

- 4.11. This demonstrates how the site could come forward within the context of the landscape and green infrastructure scheme.
- 4.12. Development to the north of the site would all be within the crescent shaped internal spine road to ensure built form is appropriately set back from the site boundaries. The layout shows a mix of detached and semi – detached houses along the road in a perimeter block pattern. Tertiary / secondary roads would lead from the spine road to provide access to some smaller units, car parking and a flat block. The flats are set deep into the site and would be no taller than 2.5 / 3 storeys. The remainder of the site would be 2 storey in keeping with the character of the surrounding area.
- 4.13. Development to the south of the site would follow a similar pattern with appropriate setbacks to existing residential dwellings located on New Moorhead Drive to the south of the site.
- 4.14. The affordable units, which would be spread across the site, would be indistinguishable from market housing in terms of their design and layout.
- 4.15. The proposed development includes 1.59 Ha of public open space, which is approximately 32% of the overall site and in excess of policy requirement.
- 4.16. The landscape masterplan (prepared by Fabrik) illustrates the proposed planting and details the play strategy which includes a Local Area for Play (LAP) and a Local Equipped Area for Play (LEAP) together with provision for young people /teenagers.
- 4.17. The development will provide more than the mandated 10% Biodiversity Net Gain (BNG) on-site

- 4.18. The applicant is further considering the provision of an informal footpath through The Birches to the east to provide further connectivity to the wider PROW network.
- 4.19. There is also a 'wedge shaped' area of clearing on the eastern boundary of The Birches which could be planted with native trees to supplement the existing woodland.
- 4.20. The Birches is land under the control of the applicant (within the application blue line) and the above proposals for its enhancement will be explored during the course of the application and during the appropriate survey seasons. Any enhancements / planting to this area can be secured by legal agreement.

5. Policy Overview

- 5.1. This section of the report summarises the national and local policy context relevant to the determination of the proposed development.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, where the Development Plan contains relevant policies, an application for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.3. In this case, the Development Plan comprises of the Horsham District Planning Framework (2015).
- 5.4. The emerging Horsham District Local Plan was submitted for examination in July 2024. In April 2025 the Planning Inspector recommended withdrawal of the plan on the basis that HDC had not properly discharged the Duty to Co-operate together with other identified fundamental issues of soundness. HDC did not withdraw the plan.
- 5.5. The government withdrew the Duty to Cooperate in November 2025 and it has been agreed with the Planning Inspectorate that hearings will recommence in April 2026.
- 5.6. HDC has also published 'Shaping Development in Horsham District' Planning Advisory Note (SD PAN). This document sets out the council's position on proposed new development in the continued absence of an up-to-date local plan or five-year housing land supply.

5.7. National Planning Policy Framework

- 5.7.1. The NPPF is a material consideration in the determination of planning applications. Local development plans must be in conformity with the aims and objectives of the NPPF. The latest version of the NPPF is dated February 2025.
- 5.7.2. The NPPF was updated with a view to delivering an increased new homes target of 370,000 new homes a year.
- 5.7.3. The relevant sections of the NPPF in relation to this application are summarised below and explored in further detail later in this Statement.

Section 2 - Achieving sustainable development

Section 5 - Delivering a sufficient supply of homes

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

5.8. National Planning Practice Guidance (NPPG)

- 5.8.1. The NPPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework. The guidance provided by the PPG has been fully considered in the creation of this application and the proposed development is seen to be fully compliant with it.

5.9. Horsham District Planning Framework (2015)

- 5.9.1. The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District outside the South Downs National Park (SDNP).
- 5.9.2. The HDPF is out of date by reason of it being over 5 years old. However, the following policies are considered to be relevant to the application and have been given full consideration in the preparation of this application.

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Need
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 39 - Strategic Policy: Infrastructure Provision
Policy 40 - Sustainable Transport
Policy 41 - Parking

5.10. Shaping Development in Horsham District Planning Advice Note (2025)

- 5.10.1. The Council is unable to demonstrate a 5-year land housing supply, with the Council's latest Authority Monitoring Report (December 2025) acknowledging a 5-year land housing supply of 1.7 years.
- 5.10.2. In the context of the Authority's inability to demonstrate a 5-year land housing supply and delays to the emerging local plan, HDC has published the 'Shaping Development in Horsham District Planning Advice Note' (SD PAN) document to clarify the approach that it will pursue in respect of spatial matters in the circumstance that existing and emerging policy is attributed greatly reduced weight. The provisions of this document represent a material consideration. This document updates the previously issued Facilitating Appropriate Development (FAD) document.
- 5.10.3. In respect of proposals for the development of unallocated land adjoining a settlement boundary, the SD PAN confirms that the Council will positively consider applications which meet all of the following criteria:
- The site adjoins the existing settlement edge as defined by the BUAB;
 - The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
 - The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;

- The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and
- The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.”

6. Planning Appraisal

6.1. Principle of Development

6.1.1. Paragraph 11(d) of the NPPF requires decision makers to apply a presumption in favour of sustainable development. This means, for the purposes of decision-taking, that where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:

- i. the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

6.1.2. Criteria i) and ii) of Paragraph 11(d) are effectively two 'limbs' of the presumption in favour of sustainable development. The presumption is not engaged unless either limb i) or ii) is satisfied.

6.1.3. 'Areas or assets of particular importance' are qualified by Footnote 7 of the Framework noting that these are policies relating to "*habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.*"

6.1.4. The Application Site is located within the HWNL and therefore Footnote 7 is engaged.

6.1.5. Paragraph 189 of the NPPF indicates that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Landscapes. Paragraph 190 requires that when considering applications for development within National Landscapes permission should be refused for major development other than in exceptional circumstances where it can be demonstrated that development is in the public interest.

6.1.6. We have undertaken a report into the exceptional circumstances which exist in support of development at the site in a separate report to demonstrate the need for the development as required by Paragraph 190 of the NPPF. The detailed findings of this report, which includes an alternative sites assessment, are not repeated here, and should be read in conjunction with this Planning Statement.

6.1.7. In summary, there are three key elements to the case for exceptional circumstances:

- i. **Housing Land Supply:** Horsham District's severe and persistent housing land supply shortfall, with only 1.7 years' supply of deliverable housing sites, as a key exceptional circumstance in favour of granting planning permission. The poor housing land supply position has arisen in part due to the long-standing constraints imposed by water neutrality requirements and the continued delay to the adoption of a new Local Plan. The consequence has been a chronic under-delivery of both market and affordable housing across the district which has persisted for a number of years.

It is notable that the Planning Inspector considering the previous appeal scheme concluded a housing land supply position at the time (July 2021) of 4.3 years. The overall need for all types of housing was afforded substantial weight in the planning

balance. However, the Inspector did not consider the circumstances of the housing shortfall at the time to be 'unusual'.

However, the housing supply position in Horsham has significantly deteriorated since the appeal was determined, falling as low as one year in April 2025. The local plan remained stalled and, though hearings are re-opening, at the time of writing it remains unclear how much additional work is required by the Council to prepare a plan which could be considered sound, or if it is possible at all given the increasing age of the evidence base. This position is more unusual compared to July 2021 when the appeal was determined.

- ii. **Meeting Crawley's unmet need:** The Council has confirmed to the Local Plan Inspector 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.*" Further, HDC is reviewing "*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.

Planning Inspectors have consistently recognised that where one authority cannot meet its housing need within its administrative boundary, it is logical for neighbouring authorities within the same Housing Market Area to assist in meeting that need. In doing so, development located in close proximity to the source of the unmet need will often represent the most sustainable solution given existing functional relationships, commuting patterns and infrastructure connections. Examples include the allocation of land at Pease Pottage in Mid Sussex (during the 2018 Local Plan Hearings) given the site was well connected to Crawley, the unmet need of which was being addressed by the emerging local plan.

- iii. **Landscape Capacity:** HDC's Landscape Capacity Study concludes that the wider parcel of land within which the Application Site is located has moderate capacity for medium scale residential development and low-moderate capacity for large scale growth. It is one of only a small number of areas around Horsham Town which are considered to have landscape capacity for residential development.

The Exceptional Circumstances Report considers other sites put forward within a defined area of search, located both within and outside of the HWNL and concludes that there are no other suitable sites with the ability to deliver new residential development in a sustainable location within 5km of Crawley.

It is considered exceptional that one of the only parcels of land considered suitable for housing growth around the most sustainable settlement in the district, and within a short journey time to Crawley, is located within the HWNL.

Further, the appeal Inspector noted in 2021 that the significant landscape harm identified related "*particularly to the eastern field*" which is excluded from this planning application.

- 6.1.8. The report concludes that there are strong exceptional circumstances which support the proposed residential development of this site.

6.1.9. Shaping Development in Horsham District Planning Advice Note

- 6.1.10. HDC, in recognition of its continued inability to identify a five-year supply of housing land and the slow emergence of a new Local Plan, has adopted the SD PAN document to help bring forward new development. Paragraph 1.9 of the SD PAN notes that "*HDC will continue*

to act in a proactive manner to deliver housing by supporting sustainable development that both delivers the requisite number of houses and ensures that other objectives are met. "

- 6.1.11. Paragraph 5.10 of SD PAN sets out how the Council will determine applications for development outside the existing Built-up Area Boundaries (BUAB) of the district using Policy 4 of the HDPF. It states that HDC " *will consider positively applications that meet all of the criteria below:*
- *The site adjoins the existing settlement edge as defined by the BUAB;*
 - *The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;*
 - *The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;*
 - *The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and*
 - *The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced."*
- 6.1.12. The pre-application feedback received noted that the proposals represent an " *appropriate level of expansion to the main settlement of the District, would assist with meeting local housing need, adjoin an existing BUAB and would not compromise long-term development.*" This satisfies the first four criteria of the SD PAN.
- 6.1.13. The fifth, relating to landscape character and features, was not considered met at pre-application. We note that the pre-application was not supported by the landscape masterplan or the Landscape and Visual Impact Assessment provided with this application.
- 6.1.14. The proposed landscaping and mitigation demonstrate that the site is contained within a defensible boundary formed of the existing trees and hedgerows. These would be strengthened by the proposed structural planting around the edges of the site, providing a significantly enhanced defensible boundary. Further detail regarding how the landscape character features are maintained and enhanced are provided later in this report and within the supporting landscape work.
- 6.1.15. The requirements of the SDPAN are met which carries weight in favour of the application. Further, it is considered that exceptional circumstances exist in favour of allowing residential development at the site.
- 6.1.16. Exceptional circumstances exist which demonstrate development of this site within the HWNL would have significant public benefit. Further, the proposal meets the tests in the SDPAN which is intended to facilitate appropriate development in sustainable locations in the absence of an up to date local plan.

6.2. Affordable Housing

- 6.2.1. Policy 16 of the HDPF states that the Council requires 35% of dwellings to be affordable. The Council's Affordable Housing Supplementary Planning Document requires affordable dwellings to be delivered at a ratio of 70% affordable rent and 30% affordable housing products.
- 6.2.2. The proposed scheme would deliver 45% affordable houses, significantly above the amount required by adopted policy.

- 6.2.3. The Applicant is committed to delivering these units in accordance with the Council's requirement for the 70/30 split in terms of tenure. This will be determined during the Reserved Matters stage. These units would be 'pepper potted' across the site and would be indistinguishable from the market units.
- 6.2.4. The delivery of Affordable Housing at a level significantly about existing and emerging planning policy carries significant weight in the planning balance.

6.3. Design and Layout

- 6.3.1. The application is in outline only with detailed matters such as layout and scale to be determined at Reserved Matters. An illustrative masterplan is provided showing the point of access (the only matter submitted for detailed approval), open space, landscaping and a layout which can appropriately accommodate the (up to) 120 dwellings proposed.
- 6.3.2. The proposed development would be accessed from a single point onto Crawley Road. The internal site road would split after entry into the site into two approximately crescent shaped arterial roads ending in cul-de-sacs with parcels of housing and parking courts connected by a series of pedestrian footpaths.
- 6.3.3. The proposed dwellings would be a mix of detached, semi-detached, and terraced dwellings, including flatted accommodation. Dwelling heights would be mainly 2 storeys with some 2.5 / 3 storeys (please see illustrative parameters plan 2126/PL.04 Rev E).
- 6.3.4. A large area of public open space is proposed to the north of the main access road which would incorporate a SuDS drainage basin and a play area. A smaller area of public open space is located to the southern boundary to provide an offset from the existing dwellings to the south. This area would also incorporate a play area and recreational space.
- 6.3.5. The landscape masterplan demonstrates how new tree planting can add detail and character to the proposed internal street layout. Soft landscaping is used throughout to break up the built form and add interest to the street scene.
- 6.3.6. The existing surrounding residential areas are predominantly made up of detached, semi-detached, and terraced two-storey dwellings / maisonettes, including a few examples of chalet-style (1.5-storey) dwellings. The proposed layout is consistent with this character. We note that the Council did not object to the indicative amount and scale of development in the previously approved scheme.
- 6.3.7. Further detail on the design approach can be found in the design and access statement (DAS).
- 6.3.8. The approach is consistent with both Policy 33 of the HDPF and Chapter 12 of the NPPF.

6.4. Landscape

- 6.4.1. The Application Site is located wholly within, but on the edge of the High Weald National Landscape (HWNL). Matters relating to exceptional circumstances for developing in the HWNL are discussed earlier in this report and in the supporting statement on this matter.
- 6.4.2. The Application Site is not typical or characteristic of the wider HWNL. This is established in part by the findings of the Planning Inspector in his report dismissing the appeal for the larger scheme in 2021. The Inspector's decision notes that the western part of the appeal site (the Application Site) has a more transitional character where development in this location would have some connection with the existing settlement edge.
- 6.4.3. Further, Paragraph 20 of the Appeal Decision notes "*Therefore, in landscape and visual terms the appeal site cannot be described as deeply rural, with evidence indicating that*

this outer part of the AONB is, perhaps unsurprisingly, one of its least tranquil areas. The area lacks elements of the inner parts of the AONB: specifically, the strong sense of intimacy generated by the more intricate topography, the remoteness associated with distance from larger settlements, and the visual interest associated with Medieval villages."

- 6.4.4. Additionally, Paragraph 16 notes that the western field (the Application Site) "*appears less well connected to the wider landscape. The lack of buffer from the road noise and the visibility of the built form of the settlement edge to the west, mean that whilst it provides a rural setting for Horsham, it has a more transitional character.*"
- 6.4.5. The site abuts the settlement boundary with residential development directly adjacent to its southern edge on New Moorhead Drive and on the western side of Crawley Road. The site is also some 175m south of the A264 which is the main link road between Horsham and Crawley and from where traffic noise is apparent. Crawley Road itself is a busy main route in and out of Horsham, connecting with the A264 to the north.
- 6.4.6. The site is therefore influenced by activity resulting from its urban edge location, traffic noise and movements, and from lights (both residential and car / street lighting) during the nighttime. The Application Site itself is typical of an urban edge location and forms a small part of the rural setting to Horsham Town.
- 6.4.7. The Inspector's conclusion is also in accord with the Council's own Landscape Capacity Study, submitted as evidence in support of the emerging local plan.

6.4.8. Landscape Capacity

- 6.4.9. The Site lies within Zone 1 Local Landscape Character Area 17 – Land North East of Horsham. The study describes that "*development on the more rising ground to the south would be more visually prominent*" and *although the landscape is partly within High Weald AONB, some of the distinctive landscape characteristics of the High Weald are less apparent.*"
- 6.4.10. The overall landscape capacity is assessed as moderate for medium scale housing development (approximately 100 – 120 dwellings). The assessment therefore recognises that there is scope for this area of land to accommodate the proposed development which proposes up to 120 dwellings. The study shows large areas of land around Horsham Town located outside of the HWNL which are not considered suitable for any level of new residential development.
- 6.4.11. The Exceptional Circumstances report further considers the land located within Area 17 and examines in more detail where the capacity identified in this parcel realistically exists. The below plan (Figure 6), taken from the report demonstrates the constraints:



- #### 6.4.15. Landscape Views

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- 6.4.19. An extensive area of land to the north of the A264 is allocated for mixed use development (Land North of Horsham) which comprises 2,750 dwellings (Planning Reference DC/16/1677), with employment areas, schools, shops, health services, leisure and recreation areas, transport links and community centres. Elements of this scheme have already been completed.
- 6.4.20. As existing, views into the site are limited to those from the immediate and local context. This is a result of the combination of residential built form, woodland blocks, embankments and intervening layers of vegetation. Longer range views into the site are limited to a small number of elevated vantage points. The character and amenity of these views will change significantly as the Land North of Horsham continues to be developed.
- 6.4.21. Open views of the Site occur from the settlement edge and where dwellings bound the southern and western boundaries. Conversely, views towards the Site from the immediate and local landscape often occur in the context of the existing domestic scale settlement edge. Views towards and across the Site (and Horsham Town more generally) are therefore not free from the influences of built form.

6.4.22. Landscape Masterplan

- 6.4.23. The landscape masterplan has been developed to demonstrate how the development can be brought forward to mitigate visual impact, provide appropriate levels of green space for future residents, and maintain views where possible across the site into the wider HWNL.



Figure 7 - Landscape Masterplan

- 6.4.24. The masterplan is shown above in Figure 7. The arrow indicates views that will remain post development:
- 6.4.25. The masterplan shows that all existing high-quality trees and hedgerows around the site boundary will be retained and enhanced with additional structural planting. This includes an appropriate buffer to The Birches woodland to the east.
- 6.4.26. Native woodland and understorey planting is proposed to the northwest of the site and along the northern boundary. The proposed woodland will bolster existing boundary hedgerows and trees and will, in the long term, filter views of the proposed development from the surrounding landscape, whilst also providing habitat connectivity once established, with the existing trees and woodland to the east of the Site. This also robustly enhances the existing defensible site boundaries.
- 6.4.27. The orange line shown in Figure 6 denotes the open view that would be maintained across the site from Crawley Road.
- 6.4.28. The proposed 15m fenced buffer zone adjacent to the existing woodland of The Birches to the east of the Site will include wildflower meadow, scrub habitat and larger native trees closest to the woodland habitat to create graded ecotone and enhance biodiversity.
- 6.4.29. A route through The Birches to the south of the woodland is being investigated to provide greater connectivity through to the PROW network. This route would follow an existing glade path and would not result in any tree removals. It would be fenced to prevent access to the woodland. Further survey work to support this will be undertaken during the spring and will inform the determination of this application.
- 6.4.30. The site access would be framed by a green gateway with tree and woodland planting to further provide visual and physical enclosure and connectivity with the network of existing and proposed woodland.
- 6.4.31. Amenity green spaces are proposed to the north and south of the Site, providing informal recreation areas for future residents. Play spaces would be provided within these amenity areas with a range of equipment types.
- 6.4.32. Sustainable drainage elements would be incorporated into the green infrastructure to ensure the green spaces are positively designed.

6.4.33. Landscape Conclusions

- 6.4.34. The Application Site lies within, but on the edge of, the High Weald National Landscape and exhibits characteristics more typical of a transitional urban-edge location than the deeply rural landscapes found within the wider designation. Previous appeal findings confirmed that the site forms part of the least tranquil area of the National Landscape, lacking the intimacy, remoteness and historic settlement patterns associated with its core areas. The site is closely influenced by nearby urban development, including housing on New Moorhead Drive and Crawley Road, and by infrastructure such as the A264, which contributes to traffic noise and urbanising influences.
- 6.4.35. The Council's Landscape Capacity Study identifies the site within Landscape Character Area 17 and concludes that the area has moderate capacity for medium-scale residential development, recognising that some distinctive characteristics of the High Weald are less apparent here. The Application Site represents the most logical location within the parcel to accommodate the identified housing capacity, as other areas are either outside the designation, too distant from the settlement edge, or previously found to cause unacceptable landscape harm.

- 6.4.36. Views into and out of the site are generally limited due to surrounding woodland, hedgerows and existing built form, while the ongoing development of the strategic North Horsham allocation will further influence the landscape context. A landscape-led masterplan has been prepared to minimise visual impacts, retain and enhance existing trees and hedgerows, provide woodland buffers and habitat connectivity, maintain key views across the site, and deliver accessible green spaces, play areas and sustainable drainage features. Together these measures demonstrate how development can be integrated into the landscape while protecting the wider character of the High Weald National Landscape.

6.5. Highways

- 6.5.1. The site benefits from an established and well-connected position on the B2195 Crawley Road corridor, with access to the wider strategic highway network via the A264.
- 6.5.2. A wide range of day-to-day services, facilities, schools, and employment opportunities are located within 2km walking distance, with all key destinations within 5km cycling distance. Continuous pedestrian routes are available to the south of the site, connecting to Horsham, with opportunities identified to enhance links immediately adjacent to the site.
- 6.5.3. The site has good access to the Public Rights of Way network, providing connections to the wider countryside.
- 6.5.4. Frequent bus services (Routes 23/23X and 200) operate along Crawley Road, within approximately 400m of the site, providing high-quality connections to Horsham town centre, rail stations, Crawley, Gatwick Airport, and Worthing.
- 6.5.5. Littlehaven Railway Station is located approximately 2.2km from the site, offering regular services to London and the wider region. Overall, the site offers genuine opportunities for travel by walking, cycling, and public transport, reducing reliance on the private car.
- 6.5.6. Access to the site will be provided via a new signalised junction onto Crawley Road, which has been previously agreed in principle with WSCC and subject to Road Safety Audit.
- 6.5.7. The development incorporates a comprehensive package of sustainable transport measures, including:
- Enhanced pedestrian and cycle connections to Crawley Road and Earles Meadow;
 - Off-site improvements to footways, crossing points, and accessibility infrastructure;
 - Upgrades to nearby bus stops, including shelters and real-time information;
 - Provision of cycle parking and electric vehicle charging; and
 - Implementation of a Framework Travel Plan to promote sustainable travel behaviour.
- 6.5.8. These measures will deliver a clear improvement in accessibility for both future residents and the wider community.
- 6.5.9. Traffic surveys confirm that Crawley Road currently operates as a well-trafficked corridor, with vehicle speeds generally below the posted 40mph limit. There have been no recorded personal injury collisions along the site frontage in the most recent five-year period and there is no identified pattern of highway safety issues in the vicinity of the proposed access.
- 6.5.10. The proposed access arrangements have been independently audited and are considered safe and suitable for all users.

- 6.5.11. The Transport Assessment demonstrates that the development will generate modest levels of traffic (circa 60–65 two-way trips in peak hours). Junction modelling has been undertaken for both opening year (2029) and future year (2031) scenarios, which confirms:
- The proposed site access will operate well within capacity, with minimal delay and queuing;
 - Key junctions, including the A264 Moorhead roundabout and Roffey Corner, will continue to operate within acceptable limits; and
 - The impact of the development on the local highway network will not be material or severe, in accordance with the NPPF test.
- 6.5.12. The assessment adopts a robust, 'worst-case' approach, with no allowance made for reductions in car trips associated with the Travel Plan or the inclusion of affordable housing.
- 6.5.13. A proportionate package of mitigation measures is proposed, including:
- Pedestrian and cycle infrastructure improvements;
 - Bus stop enhancements; and
 - A site-wide Travel Plan.
- 6.5.14. The proposals align with national and local transport policy, including the NPPF and Horsham District Planning Framework, by:
- Prioritising sustainable transport modes;
 - Delivering safe and suitable access for all users; and
 - Ensuring impacts on the highway network are appropriately mitigated.

6.6. Ecology and BNG

- 6.6.1. An Ecological Impact Assessment (EclA) has been prepared by The Ecology Co-operation to support the proposed development. The assessment draws upon desk study data and a programme of ecological surveys undertaken between 2019 and 2025, including habitat surveys and protected species surveys for bats, badgers, breeding birds, dormice, great crested newts and reptiles.
- 6.6.2. The site itself contains habitats of generally **low ecological value**, principally the arable field, with higher value habitats limited to the boundary hedgerows and the adjacent woodland which lies outside the application site.
- 6.6.3. Ecological surveys recorded several notable species using the site or surrounding habitats including foraging and commuting bats (including barbastelle), hazel dormouse, badger, grass snake and breeding birds such as skylark. The majority of ecological activity is associated with the site boundaries and adjacent woodland, which form part of the wider ecological network in the area. Surveys confirmed that great crested newts are likely absent from the site and surrounding ponds.
- 6.6.4. The proposed development will result in the loss of the arable field habitat, which has relatively low ecological value, while the majority of boundary habitats will be **retained and protected**. A small section of hedgerow will be removed to facilitate the new access. The potential ecological impacts primarily relate to habitat loss within the field, disturbance during construction, and increased lighting and recreational pressure on surrounding habitats.

6.6.5. A comprehensive package of mitigation and enhancement measures has been incorporated into the scheme. Key measures include:

- Retention of the majority of existing boundary hedgerows and woodland;
- Creation of a minimum 15-metre ecological buffer along the eastern boundary adjacent to the woodland;
- Implementation of a sensitive lighting strategy and dark corridors to protect bat commuting and foraging routes;
- Timing of vegetation clearance to avoid the bird nesting season;
- Provision of skylark plots within nearby arable land to compensate for the potential loss of a breeding territory;
- Habitat manipulation measures to safeguard reptiles and other wildlife during construction;
- Installation of bird and bat boxes and hedgehog connectivity measures; and
- Creation of new woodland planting, species-rich grassland and hedgerow habitats.

6.6.6. These measures can be secured through appropriate planning conditions and detailed management plans, including a Construction Environmental Management Plan (CEMP) and Landscape and Ecology Management Plan (LEMP).

6.6.7. Subject to the implementation of the recommended mitigation and enhancement measures, the EclA concludes that the development would not result in any significant adverse ecological effects and would deliver measurable biodiversity enhancements, including the creation of new habitats and ecological buffers. The proposals therefore accord with the requirements of the National Planning Policy Framework and local planning policy relating to biodiversity protection and enhancement.

6.6.8. Biodiversity Net Gain

6.6.9. A Biodiversity Impact Calculation (BIC) has been undertaken using the Statutory Biodiversity Metric, informed by up-to-date ecological surveys and an Ecological Impact Assessment.

6.6.10. The site predominantly comprises arable land, with areas of modified grassland and bracken, bounded by hedgerows and a tree-lined ditch. Adjacent habitats include woodland and residential development.

6.6.11. The baseline assessment identifies 9.89 habitat unit; and 2.99 hedgerow units.

6.6.12. Ecological surveys have confirmed the presence of protected and notable species in the wider area, including dormouse, bats, breeding birds, and reptiles, which have informed the design and mitigation strategy.

6.6.13. The development will result in the loss of primarily low-value arable land and small areas of grassland, bracken, and hedgerow. However, the scheme has been designed to retain and enhance key boundary features, including:

- Retention of existing trees and hedgerows;
- Enhancement of existing hedgerows to improved condition; and
- Integration of new green infrastructure across the site.

- 6.6.14. New habitats will be created as part of the landscape-led design, including areas of woodland planting, native scrub, and species-rich grassland. There will also be extensive planting within private gardens and public open space, sustainable drainage features with ecological value and new native hedgerow planting and tree provision.
- 6.6.15. The BNG assessment confirms that the development will deliver significant measurable net gains in biodiversity as follows:
- 43.77% net gain in habitat units (equating to +4.33 units); and
 - 65.45% net gain in hedgerow units (equating to +1.96 units).
- 6.6.16. These results exceed the national requirement of delivering 10% BNG. Further, the proposals comply with the statutory biodiversity metric trading rules, ensuring that habitat losses are appropriately compensated by equivalent or higher-value habitat creation.

6.7. Trees

- 6.7.1. An Arboricultural Impact Assessment and Method Statement has been prepared by Arbortrack Systems to assess the potential impacts of the proposed development on existing trees within and adjacent to the site.
- 6.7.2. The survey identified a total of 53 trees and tree groups within or close to the site. Of these, 30 trees are classified as Category B (moderate quality) and 23 as Category C (low quality). The majority of trees are located along the site boundaries and woodland edges, with the interior of the site largely open. No trees of Category A quality were identified.
- 6.7.3. The proposed development has been designed to retain the majority of the existing trees, with most construction activity located outside the Root Protection Areas (RPAs) of retained trees. A limited number of low-quality trees and hedgerow sections (including trees 16–18, part of hedgerow H19, and trees 21 and 21a) are proposed for removal to facilitate development. These trees are of relatively limited arboricultural and landscape value, and their removal is considered to have minimal impact on local amenity. The scheme provides good opportunities for replacement tree planting, which will be secured through the landscape proposals.
- 6.7.4. Where development occurs in proximity to retained trees, appropriate arboricultural protection and construction methods will be implemented. These include:
- Installation of tree protection fencing in accordance with BS5837:2012 prior to the commencement of construction;
 - Protection of Root Protection Areas throughout the construction phase;
 - Use of “no-dig” construction techniques for sections of hard surfacing within RPAs to avoid root damage;
 - Careful routing of services to avoid RPAs wherever possible;
 - Ongoing arboricultural supervision and site monitoring during key stages of development.
- 6.7.5. The Arboricultural Impact Assessment concludes that, subject to the implementation of the recommended tree protection measures, construction methodologies and landscaping proposals, the development can be carried out without unacceptable harm to the retained trees. The proposals are therefore considered to accord with relevant planning policy relating to the protection and retention of trees.

6.8. Heritage and Archaeology

- 6.8.1. Archaeology South East has prepared a desk-based assessment considering the potential impacts on above and below ground heritage assets.
- 6.8.2. The report concludes that the Site has a high potential for deposits of prehistoric date, including flint scatters of Palaeolithic, Mesolithic and Neolithic date. It also has moderate potential for heritage assets of medieval and post-medieval date and a low potential for late prehistoric to Saxon features.
- 6.8.3. The Site has been exposed to some truncation from arable activity but fieldwork within the Site and on adjacent arable fields has indicated the survival of archaeological deposits.
- 6.8.4. A programme of further fieldwork is proposed to confirm the presence or absence of archaeological deposits. This can be secured by planning condition. It is noted that this approach was considered acceptable during the previous application for the larger scheme and was not considered further during the appeal process.
- 6.8.5. The report also notes that a minor impact is anticipated on the setting of Moorhead Cottages. These are a group of three cottages on the western side of Crawley Road opposite the south west corner of the Application Site.
- 6.8.6. These cottages were formally a single house with elements dating to the 17th Century and are Grade II listed.
- 6.8.7. The report notes that the building derives the majority of its significance from its fabric, *"preserving evidence of the transformation from medieval hall-house to modern terraced cottages."* There will be no physical impacts on the building, so this significance will not be affected.
- 6.8.8. It is noted that these conclusions are the same as those reached during determination of the previous scheme and were not discussed further during the Appeal.
- 6.8.9. The heritage impact of the development is therefore considered acceptable.

6.9. Flood Risk, Surface and Foul Water Drainage

- 6.9.1. A Flood Risk Assessment (FRA) and Outline Drainage Strategy has been prepared by Aquaterra Consulting to assess flood risk at the Site and demonstrate how surface water will be managed in accordance with national and local policy.
- 6.9.2. It is noted that the land slopes gently north-westwards towards an unnamed ordinary watercourse located approximately 90m to the north-west. This drains into Channels Brook, a tributary within the Arun catchment.
- 6.9.3. The assessment confirms that the entire Site is located within Flood Zone 1, which represents land with a less than 1 in 1,000 annual probability of flooding. There is no recorded history of flooding at the Site. The Site is also identified as having very low risk of surface water flooding, negligible risk of groundwater flooding, low risk of sewer flooding, and no risk from reservoir flooding.
- 6.9.4. The proposed residential development is therefore appropriate in flood risk terms under the National Planning Policy Framework, and neither the Sequential Test nor Exception Test are required.
- 6.9.5. An outline drainage strategy has been prepared in accordance with the DEFRA National Standards for Sustainable Drainage Systems (SuDS) and the requirements of West Sussex County Council as Lead Local Flood Authority. The strategy is designed to ensure that the

- development will not increase flood risk elsewhere and that post-development runoff rates will be limited to greenfield runoff rates.
- 6.9.6. Surface water will be managed through a SuDS management train, including measures such as rainwater harvesting, permeable paving, swales and a detention basin. These features will attenuate runoff and control discharge to approximately 15 litres per second, which is below the equivalent greenfield runoff rate. Attenuation storage will be provided through a combination of permeable paving and a detention basin, which together provide sufficient capacity to manage storm events up to the 1 in 100 year event plus climate change allowance.
- 6.9.7. The drainage modelling demonstrates that the proposed system will reduce peak runoff rates and volumes compared to the existing greenfield condition, with peak flows significantly lower than current levels. The strategy also incorporates exceedance flow routing to safely manage extreme rainfall events and ensure that surface water is directed away from residential areas.
- 6.9.8. In addition to managing flood risk, the proposed SuDS features will also provide water quality treatment, biodiversity enhancements and landscape amenity benefits through the use of swales, vegetation and sustainable drainage infrastructure.
- 6.9.9. Overall, the FRA concludes that the Site is suitable for residential development and that the proposed drainage strategy will manage surface water effectively for the lifetime of the development without increasing flood risk on or off the Site.

6.10. Air Quality

- 6.10.1. An Air Quality Assessment has been prepared to consider the potential effects of the development on local air quality during both the construction and operational phases, with reference to the NPPF, Planning Practice Guidance, and local policy within the Horsham District Planning Framework.
- 6.10.2. The Site is located within a suburban area approximately 2.75 km north-east of Horsham town centre. It is not located within, or close to, an Air Quality Management Area (AQMA). The nearest AQMA is located in Crawley, approximately 8.4 km to the north-east of the site. A review of monitoring data from Horsham District Council and DEFRA background mapping confirms that existing concentrations of nitrogen dioxide (NO₂), PM₁₀ and PM_{2.5} in the vicinity of the Site are well below national Air Quality Objectives.
- 6.10.3. The development is expected to generate an increase of approximately 445 daily vehicle movements on the surrounding road network. This level of additional traffic is below the thresholds set out in Institute of Air Quality Management (IAQM) guidance that would trigger the need for detailed dispersion modelling. As a result, the increase in traffic is not expected to have a significant effect on local air quality. In addition, the scheme will utilise ultra-low NOx boilers or non-combustion heating systems, ensuring that building-related emissions are minimal.
- 6.10.4. A construction dust risk assessment has been undertaken in accordance with IAQM guidance. The assessment identifies a medium risk of dust soiling during earthworks, construction and track-out activities, and a low risk in relation to human health impacts. A comprehensive Dust Management Plan is proposed, including measures such as dust suppression, monitoring, controlled vehicle movements, wheel washing, and good site management practices to minimise emissions during the construction phase.
- 6.10.5. An emissions mitigation assessment has also been undertaken in accordance with the Sussex Air Quality and Emissions Mitigation Guidance (2021). The development's estimated transport-related emissions equate to a five-year damage cost of approximately £5,975,

which can be addressed through standard mitigation measures such as electric vehicle charging infrastructure and sustainable transport initiatives.

- 6.10.6. Overall, the assessment concludes that the Site is suitable for residential development from an air quality perspective, and that, with the implementation of appropriate construction management measures, the overall effect of the proposed development on local air quality would be not significant and compliant with national and local planning policy.

6.11. Noise

- 6.11.1. An Environmental Noise Impact Assessment has been undertaken to support the proposed development. A baseline noise survey was carried out in March 2026 to establish the existing acoustic environment. The survey confirmed that the primary noise source affecting the site is road traffic from Crawley Road, with noise levels decreasing across the site moving eastwards away from the road.
- 6.11.2. The assessment identifies varying noise conditions across the site. Areas closest to Crawley Road experience higher noise levels, falling within low to medium risk categories at night. Central areas of the site are classified as low risk and the eastern parts of the site experience negligible to low risk levels.
- 6.11.3. Overall, the site is categorised as 'low noise risk' under ProPG guidance, meaning it is suitable for residential development subject to appropriate design mitigation.
- 6.11.4. A detailed Stage 2 assessment has been undertaken in line with ProPG, incorporating a "Good Acoustic Design Process". This confirms that suitable internal and external living conditions can be achieved through standard and proportionate mitigation measures, including:
- Careful site layout and orientation, positioning less noise-sensitive rooms away from Crawley Road where practicable;
 - Use of standard building fabric and glazing specifications to achieve internal noise standards;
 - Potential use of acoustic fencing along the site boundary and within gardens where required; and
 - Consideration of enhanced ventilation strategies in limited areas where open windows may not always be appropriate.
- 6.11.5. The assessment confirms that internal noise standards set out in BS8233 can be achieved with these measures.
- 6.11.6. The majority of external amenity areas will experience noise levels within acceptable guideline limits. Where higher levels may occur near the site frontage, mitigation through layout, screening, and boundary treatments can be applied.
- 6.11.7. In addition, the assessment confirms that overheating and ventilation requirements can be addressed, with most dwellings able to rely on natural ventilation. In limited areas, alternative ventilation solutions may be required and can be secured at detailed design stage.

6.12. Energy

- 6.12.1. The proposed development has been designed in accordance with national and local policy, including the NPPF and relevant Horsham District policies on climate change, energy efficiency, and sustainable construction.
- 6.12.2. The scheme adopts a clear energy hierarchy of 'Lean, Clean, and Green', prioritising demand reduction, energy efficiency, and renewable energy generation.
- 6.12.3. A fabric-first approach will be employed, delivering enhanced insulation, airtightness, and reduced thermal bridging, exceeding Building Regulations Part L (2021) requirements;
- 6.12.4. The development is designed to achieve the Future Homes Standard, representing a significant uplift in energy performance. All dwellings will utilise low-carbon heating systems, with air source heat pumps for houses and exhaust air heat pumps for apartments. Photovoltaic panels are proposed across the development, subject to detailed design.
- 6.12.5. Overall, the scheme is predicted to achieve a c.72% reduction in carbon emissions compared to the Building Regulations baseline (TER), reducing emissions from approximately 105,918 kgCO₂/year to 28,996 kgCO₂/year.
- 6.12.6. The development will be net zero carbon ready, with all-electric systems ensuring emissions will reduce further as the National Grid decarbonises. No gas connection is proposed.
- 6.12.7. The proposals incorporate a range of passive and active design measures, including:
 - Optimised **building orientation** to maximise solar gain and natural daylight;
 - High-performance building fabric with improved U-values and airtightness;
 - Energy-efficient lighting and building services; and
 - Design measures to support natural ventilation and reduce overheating risk.
- 6.12.8. The development will achieve a water consumption rate of 110 litres per person per day through the use of water-efficient fixtures and fittings. This will accord with relevant local policy.
- 6.12.9. Climate resilience is embedded within the design, including use of SuDS to manage surface water and attenuate flows, design measures to address overheating, flood risk, and water efficiency, and integration of green infrastructure to support environmental performance.
- 6.12.10. The Sustainability and Energy Statement demonstrates that the proposed development will deliver a highly sustainable scheme, achieving substantial carbon reductions and aligning with both adopted and emerging policy requirements.
- 6.12.11. The proposals will contribute positively towards the transition to net zero, while delivering high-quality, energy-efficient homes in a sustainable and future-proofed manner.

6.13. Ground Conditions

- 6.13.1. A Phase 1 Preliminary Assessment has been undertaken on the Application Site by Aqua Terra. It concludes that the level of risk ranged between low and moderate.
- 6.13.2. A further ground investigation and environmental testing of soils can be subject to an appropriately worded condition.

7. Conclusion

- 7.1. This planning statement has been prepared in support of an outline planning application for the development of up to 120 residential dwellings (including 45% affordable housing) on land off Crawley Road, Horsham, with all matters reserved except access.
- 7.2. The proposals would deliver a sustainable residential development on land located immediately adjacent to the existing built-up area of Horsham. The site is well related to the existing settlement edge and benefits from good access to local services, facilities and public transport connections. The scheme therefore represents a logical and sustainable extension to the town.
- 7.3. The application comes forward in the context of Horsham District Council's significant and persistent housing land supply shortfall, currently identified as approximately 1.7 years, which represents a substantial deficit against national planning policy requirements. The development would therefore make a meaningful and immediate contribution towards addressing both market and affordable housing needs within the district. In particular, the delivery of 45% affordable housing significantly exceeds the requirement set out in adopted policy and would provide an important social benefit.
- 7.4. The site is located within the High Weald National Landscape, and the application has been supported by a detailed Exceptional Circumstances Report which demonstrates why the development is in the public interest in accordance with paragraph 190 of the National Planning Policy Framework. These exceptional circumstances include the acute housing land supply shortfall, the need to assist in meeting unmet housing need within the wider housing market area (including Crawley), and the identification of landscape capacity for residential development within this location.
- 7.5. The proposals have been informed by a landscape-led approach which retains and enhances existing trees, hedgerows and woodland, provides significant areas of public open space and ecological buffers, and introduces substantial structural planting to integrate the development into the surrounding landscape. The submitted landscape masterplan demonstrates how the development can be sensitively accommodated while maintaining the wider character of the National Landscape.
- 7.6. A comprehensive suite of technical assessments has been prepared to support the application, including work relating to landscape and visual impact, ecology, arboriculture, flood risk and drainage, heritage, air quality and ground conditions. These assessments confirm that the development can be delivered without unacceptable environmental impacts, and that appropriate mitigation and enhancement measures can be secured through planning conditions and legal agreement where necessary.
- 7.7. The proposals also accord with the Council's Shaping Development in Horsham District Planning Advice Note, which seeks to facilitate appropriate development adjoining settlement boundaries in the absence of an up-to-date local plan and five-year housing land supply.
- 7.8. When assessed against the development plan as a whole, together with all other material considerations, the proposed development is considered to represent sustainable development in accordance with the principles of the National Planning Policy Framework.
- 7.9. For the reasons set out above, and having regard to the significant benefits associated with the delivery of new homes, affordable housing, public open space, biodiversity enhancements and landscape improvements, it is respectfully requested that outline planning permission is granted for the proposed development.

