



**Outline Planning Application**  
**for**  
**a residential development at**  
**Toat Café, Stanes Cottage, Stanes Farm**  
**and Whitelands Farm**  
**Pulborough**  
**West Sussex**  
**RH20 1DN**

May 2026

Our Ref: 1726



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## **1 Introduction**

- 1.1 This statement supports an outline planning application relating to a proposed residential development at Toat Café, including Stanes Cottage, Stanes Farm and Whitelands Farm, Pulborough, Sussex RH20 1DN.
- 1.2 The applicant is Mr George Macari.
- 1.3 The application follows two pre-application submissions as follows:
- a) Initial Submission on 20 January 2025 and "High Level Advice" from Tal Kleiman, senior planning officer at Horsham District Council (HDC), was received in writing on 31 January 2025.
  - b) Pre-application submission reference PE/25/0141 submitted on 25 June 2025 with advice received from Giles Holbrook on 5 August 2025.
- 1.4 The proposed development comprises the following:
- (i) A new roundabout and access from the A29
  - (ii) 54 houses comprising a mix of 2, 3 and 4 bed dwellings
  - (iii) 39 flats within two buildings comprising a mix of 1, 2 and 3 bed dwellings
  - (iv) Pharmacy
  - (v) Shop and Café
  - (vi) Locally Equipped Area for Play (LEAP) and community pavilion.
  - (vii) Multi-functional greenspace incorporating SUDs features and Green Corridors.
  - (viii) Mountain Bike Technical Skills Area
  - (ix) On and off-site Biodiversity Net Gain measures including a new 1.98 ha meadow including species rich hedgerows and trees.
  - (x) Associated landscaping.
- 1.5 The outline application is for all matters reserved apart from the new access which is to be determined.
- 1.6 Early discussions with HDC, Pulborough Parish Council and the local community have been carried out in accordance with paragraph 137 of the National Planning Policy Framework (NPPF).
- 1.7 As noted above, "high level" advice was received from HDC in January 2025, after which a more detailed pre-application submission was made by MCA Architects in June 2025 which addressed concerns raised in the high-level advice in the context of a changing planning policy context. A response was provided by HDC in August 2025. This statement addresses all matters raised by HDC in their pre-application advice.
- 1.8 A Public Consultation was held regarding the scheme with residents of neighbouring properties in particular and interested parties within the local area. This meeting was
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advertised in the local press and letters sent out to 77 local residents, 3 ward councillors and the Parish Council. The consultation was held on 26 January 2026.

- 1.9 A range of suggestions were made by local residents about the design. These suggestions were considered in detail and, where possible and appropriate, incorporated into the scheme.
- 1.10 In addition to the above, 65 letters of support for the proposed development were signed by local residents.
- 1.11 The application also follows an extensive marketing campaign over a 2-year period for the site by the applicant's commercial agent. This targeted the commercial uses listed in the recently "made" Pulborough Neighbourhood Plan (PNP). Due to a lack of proceedable interest, it was concluded that converting the site to residential use is the only feasible and sustainable way of developing the site.
- 1.12** The site is located 2.5km north of Pulborough on the west side of the A29. The village of Codmore Hill with its array of services is 535m south of the site and immediately to the north of the site is a shop and petrol station (185m). The PNP extends the built-up area boundary (BUAB) to include an allocated site (PNP Policy 7) which reduces the distance between the site and the BUAB to under 300m (approximately 270m).
- 1.13** The site is connected by a level pavement to both Codmore Hill as well as the petrol station and shop. These pedestrian routes along with general sustainable transport options to and from the site will be improved as part of the proposals.
- 1.14** A significant area (1.98 Ha) of land owned by the applicant, has been set aside for Biodiversity Net Gain (BNG). Other areas within the site and outside residential curtilage provide additional biodiversity enhancements.
- 1.15** This Design and Access Statement will demonstrate that this proposal complies with the Government's planning policies for new housing contained in the NPPF and demonstrates the following:
  - a) The site is in a sustainable location, and the proposal provides much-needed housing for HDC which cannot demonstrate a 5-year supply going forward.
  - b) The proposal is a well-designed and appropriate masterplan which responds to and integrates into the existing landscape and pattern of development.
  - c) All matters raised in the pre-application submissions and public consultations have been addressed and, where possible and appropriate, incorporated.
  - d) Pedestrian and vehicular access into the site has been given careful consideration and no harm will arise from the development in terms of highway safety.
  - e) The site will have genuine choice of sustainable modes of transport to and from the site.

- f) The site will have appropriate levels of parking and cycle storage as well as appropriate allowance for the manoeuvre of refuse vehicles and fire appliances used in this area.
- g) The proposal is "landscape led" and has been carefully designed to maintain existing field boundaries, provide screening for the development, incorporate existing and new multi-functional greenspace, screening and landscape buffers, conserving and enhancing the rural character of the area.
- h) The development will provide a variety of public open space and therefore recreational opportunities.
- i) The new proposal will fit well into the existing development pattern as part of an existing line of development along the A29 corridor.
- j) Having marketed the site for the commercial uses listed in the PNP site allocation and exhausted all avenues, it is considered not viable or feasible to develop this site for those uses. There is limited existing employment on the site and the proposed development including will ensure there is no net loss of employment
- k) The land is in HDC where there is a lack of housing supply moving forward (1.7 years) and this proposal would provide a significant contribution to the shortfall in the district. Furthermore, housing allocations in the PNP are based on old evidence and do not reflect current housing need in the area.
- l) The proposals provide compliant BNG provision and preserve and enhance the ecology across the site.
- m) All existing trees will be retained with only limited grade 'C' and 'U' trees being removed for the purposes of good arboricultural management.
- n) Sustainable Urban Drainage (SUDs) has been incorporated into the proposals to ensure that discharge of surface water into the existing ditches will be no more than currently exists at the site.
- o) The proposal takes into account the amenity of adjoining neighbours.
- p) The proposal is acceptable in heritage terms and the design of the buildings will reflect the local West Sussex vernacular.

## **2 Assessment of the site**

- 2.1 An aerial photograph is shown below depicting the four distinct character areas of the site and immediate adjacent landscape.
- 2.2 Immediately to the south of the application site is a well-maintained field which nestles between the houses fronting Blackgate Lane and the junction with Stanes Street. To the north of the site is a field in agricultural use.

- 2.3 The existing site is characterised by generally well treed boundaries on its north, west and south sides with the eastern boundary being visually completely open with no boundary treatment of landscaping in Character Area 1.



Fig. 1 – Aerial photograph depicting four distinctive character areas of the site

#### 2.4 Character Area 1 – The Toat Café

- 2.4.1 This area comprises the Toat Café, which is a well-known transport café having been in existence since at least 1975. The café is located on the east side of the site and is surrounded by substantial hard surfacing on its south and east side which provides car parking for cars and lorries using the facilities. There is a large car washing facility adjacent, and immediately to the north of the café which is surrounded by further hard surfacing on its north-east and south sides. Beyond the car park to the west is a substantial area of rough turfed land. This area is level and is considered to be “previously developed land” (PDL). There are two large vehicular entry points into this area from Stane Street (A29), one towards the south of the car park and the other towards the north.
- 2.4.2 The whole of the eastern boundary is open to views from the road and outside the site as well as from the pavement which runs past it. However, the other three boundaries are densely treed and shrubbed which are predominantly formed from indigenous deciduous species.



Fig. 2 – Aerial photograph Character Area 1



Fig. 3 – Photograph looking northeast along the A29 towards the Toat Café buildings

## 2.5 Character Area 2 – Stanes Cottage and Stanes Farm South

- 2.5.1 This area is level and is surrounded on its north-east and southern boundaries by a dense tree screen and is not visible from public viewpoints. Stanes Cottage is located within this and is a large dwelling owned by the applicant's family. There are 5 residential caravans within the site, all of which are lawful and occupied. To the south side of the site, which is divided by a tree screen, is an area of turf and a series of aged, but structurally sound farm/barn buildings which were previously utilised by Stanes Farm. Here, there are 2 further residential caravans, also lawful and occupied. The north west boundary of this character area is open and adjoins

to Character Area 3. There are two vehicular accesses into this site, one which served Stanes Cottage and the other the Barns associated with Stanes Farm. These are in use.



Fig. 4 – Aerial photograph Character Area 2 (CA2)



Fig. 5 – Farm/barn buildings on southwest boundary of CA2



Fig. 6 – Rear elevation of Stanes Cottage

2.6 Character Area 3 – Area of Pasture (Stanes Farm North)

- 2.6.1 In a similar manner to Character Areas 1 and 2, this area of land is almost completely level and is bounded on its north, west and south sides by a dense tree screen. There are a range of dwellings beyond the southern boundary of the site which front onto Blackgate Lane and are barely visible from within the site. There are only filtered views through the tree screen on the west side of the site in the winter. The bulk of the land is covered by rough pasture with views into Character Area 2.



Fig. 7 – Aerial photograph Character Area 3

## 2.7 Character Area 4 – Whitelands Farm

- 2.7.1 This parcel of land is located to the north and is surrounded by trees and dense vegetation. A barn is located in the northwest corner near the access which is from Blackgate Lane. This land is to be set aside for open space provision and off-site BNG.
- 2.7.2 This has recently been the subject of illegal dumping (by others) of contaminated waste which has now been fully remediated by the applicant at their cost and to the satisfaction of the Council.



Fig. 8 – Aerial photograph Character Area 4

- 2.8 Shown below is an extract taken from the Horsham Interactive Map depicting the whole site and the immediate surroundings. Each of the Character Areas (CA) noted above are indicated as well as the existing buildings on the site.

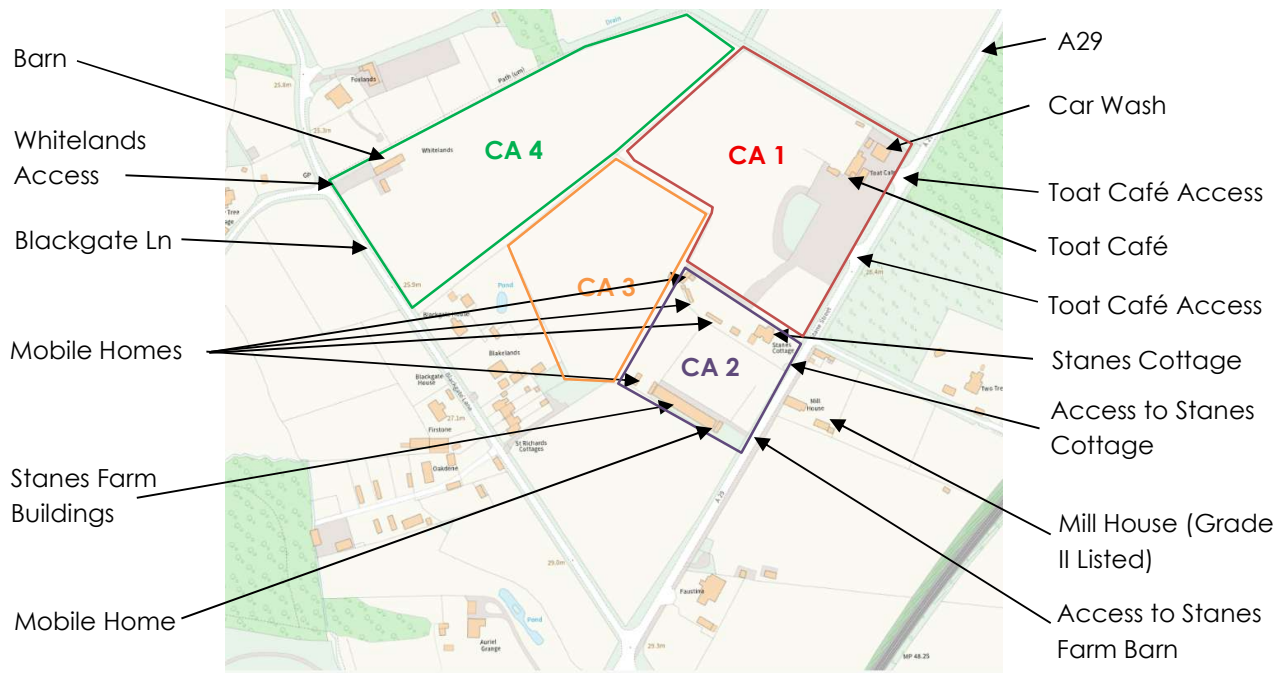


Fig. 9 – extract of Horsham Interactive Map

### 3 Pre-applications.

#### 3.1 "High Level" Pre-Application Advice (January 2025)

- 3.1.1 MCA approached HDC in January 2025 to enquire as to whether they would consider the site comprising Toat Café, Stanes Cottage and Stanes Farm for a mix or housing and commercial development. Part of the site was allocated in the Pulborough Neighbourhood Plan (PNP), then in draft form, for various commercial uses.
- 3.1.2 The enquiry was made partly in response to HDC's assessment of the site, (which included Whitelands Farm), as part of the SHELAA (December 2018). The site reference was SA677. It was considered "Not Currently Developable". Reasons for this included the council considering the site as detached from nearby settlements, not in a sustainable location and concerns about potential negative landscape impacts.
- 3.1.3 Initial proposed development options were presented, depicting broad zoning for different uses including:
- A mixed commercial and housing scheme on the emerging PNP allocated site (Option 1)
  - A scheme for 100% housing (Option 2)

- 
- c) Mixed industrial and housing developments incorporating land on the south side of Stanes Farm (Option 3) and including all of Stanes Farm (Option 4) to provide additional lower density housing.
- 3.1.4 Housing was included due to the poor supply in HDC, which has since worsened as explained later in this report.
- 3.1.5 MCA noted that the site is sustainable with access to public transport and services. MCA also noted there would be no negative landscape impacts given the existing buildings and hardstanding on site and existing screening. Furthermore, despite marketing the site for commercial uses, (for over a year at that time), it was difficult to secure commercial tenants for the whole site.
- 3.1.6 Reference was made to initial consultations, also in January 2025, with Pulborough Parish Council (PPC). Whilst they were unable to formally comment on or endorse the proposals, PPC made the following points:
- (i) Proposals should take into account the provision of utilities and drainage, open/play space and due care over ecological matters including Biodiversity Net Gain (BNG).
  - (ii) Care to be taken to provide a safe access
  - (iii) Concern about the loss of agricultural land
  - (iv) Requirement to ensure proposals apply water neutrality.
  - (v) Provision of facilities for young people between the ages of 11-18 encouraged.
- 3.1.7 HDC provided their written, high level, advice on 31 January 2025 and did not support the proposals. The response is included in **Appendix A** and summarised below:
- (i) The site not allocated in the HDC and not in the built-up area boundary, which is HDC's preference when considering housing sites.
  - (ii) HDC accepted that, due to their poor housing supply figures, (2.9 years at that time), housing policies in the development plan may be considered "out of date" in the context of the NPPF and therefore the "tilted balance" is in effect which increases the chances of speculative development proposals such as the Toat/Stanes having a "positive determination".
  - (iii) "Tilted balance" would not be engaged if water neutrality cannot be demonstrated.
  - (iv) Residential development is not supported in the emerging PNP. (This has since been made)
  - (v) The site is not considered suitable when assessed as part of the development of the HDLP. (See reasons noted above.)
-

**3.2     Pre-Application Submission (June 2025)**

- 3.2.1     Proposals were developed in light of the above "high level" advice and in response to changing planning context. A formal pre-application was made in June 2025, planning reference PE/25/0141.
- 3.2.2     The proposal put forward for consideration was the removal of all the existing buildings on site and their replacement with 93 housing units, a Local Equipped Area for Play (LEAP) and the provision of a new vehicular access into the site comprising a roundabout. An alternative scheme with an alternative access, i.e. a priority junction, was also submitted.
- 3.2.3     The housing scheme comprised a mix of 1, 2, 3 and 4 bedroom units, largely reflective of the local Strategic Housing Market Assessment and incorporating 35% affordable housing. The scheme would incorporate significant amounts of additional tree and shrub planting and new green space. The substantial tree planting around the boundaries of the site as well as the perimeter of each of the character areas would also be retained.
- 3.2.4     The pre-application was supported by the following consultant reports:
- a)     A pre-application Transport Assessment by Bellamy Roberts, dated 13 June 2025
  - b)     A Preliminary Ecological Appraisal by "enims", dated June 2025.
  - c)     A Water Neutrality Statement and Rainwater Harvesting Management and Maintenance Plan produced by Motion, dated 12 and 13 June 2025 respectively.
- 3.2.5     Shown below is an extract of drawing no. 1726/SP-01, proposed site plan depicting the development proposal for the 93 dwellings utilising a roundabout to access the site. Inset is the alternative priority junction access.



Fig. 10 – Extract of drawing no. 1726/SP-01, proposed site plan, Option 1 with an extract from drawing 1726-SP-02 depicting the alternative access (Option 2) inset.

- 3.2.6 The pre-application scheme comprised a mix of dwellings varying from a range of one and two bedroom flats (28 no.), through to 1, 2, 3 and 4 bedroom houses. The housing mix was spread through the proposed development with 35% of the dwellings being affordable and 65% of them being market housing.
- 3.2.7 The proposal included the retention of existing site and boundary trees (indicated in dark green) on north, west and south sides, and substantial additional tree/shrub planting (indicated in light green) along the eastern boundary and within the site improving biodiversity and contributing to BNG along with off-site provision on Whitelands Farm.
- 3.2.8 The development proposal incorporated a substantial area of LEAP including a children's play equipment and a skate park and a substantial network of proposed footpaths within the site providing pedestrian access to the LEAP without the need to use the road system, with the exception of some of the smaller shared surfaces at the periphery of the development.

3.2.9 A detailed pre-application response was received from HDC in on 5 August 2025 and is contained in **Appendix B**. Key Issues identified by the planning officer are outline below:

a) **HDC Spatial Strategy**

(i) The planning officer notes in their pre-application response that:

*"The pre-application site is located beyond a defined built-up area boundary in a location which would not be supported by existing or emerging development plan policy."*

(ii) However, he goes on to acknowledge that:

*"The spatial housing policies of the existing development plan, however, attract significantly diminished weight as a consequence of the Council's housing land supply position while the policies of the draft HDLP can only be afforded minimal weight pursuant to Paragraph 49 in light of the plan inspectors 'interim findings' letter of March 2025"*

b) **Draft Pulborough Neighbourhood Plan**

(i) The officer notes that the proposals conflict with the policies and allocation in the PNP. (The PNP was in draft when the pre-app advice was given and was 'made' on 8 October 2025.)

(ii) Part of the site has been allocated for various commercial uses as described in more detail later in this report. A Planning Viability Report has been prepared by Jonathan Mack MRICS of Crickmay Chartered Surveyors and demonstrates that after a robust, two-year marketing campaign:

*"The lack of proceedable interest following a significant marketing campaign targeting a wide range of national and regional operators and commercial developers leads me to conclude that the site is not commercially viable for continued or future commercial use" and "...there is no realistic prospect of the site being brought forward for viable commercial development and I therefore conclude that the proposed conversion of the site to residential use represents the only feasible and sustainable alternative for the future use of the site."*

(iii) The above, along with HDC's housing delivery and abject housing land supply going forwards, reduces the weight that should be applied to Policy 8 of the PNP.

(iv) Furthermore, the housing allocations within the PNP are based on the 2017 AECOM assessment and therefore do not reflect the most up-to-date evidence of local housing need.

- (v) Although the PNP may be protected by NPPF paragraph 14(a) due to its age, it does not satisfy paragraph 14(b) which requires allocations to meet an identified housing requirement. (This is contrary to the pre-application response which considers the housing allocations sufficient to meet the identified needs of the parish.) Therefore the “tilted balance” remains engaged.

c) **Sustainability of location**

- (i) The planning officer did not agree with the findings of the Pre-Application Transport Assessment by Bellamy Roberts which confirmed that the site is a sustainable location.
- (ii) All points raised in the pre-application advice are addressed in detail within the Transport Statement and Framework Travel Plan by Bellamy Roberts which further support the sustainability of the location and follows positive engagement with the Highway Authority.

d) **Landscape and visual impact**

- (i) The officer considered that the development would harm the rural character of the area and be inconsistent with the existing settlement pattern.
- (ii) A Landscape and Visual Impact Assessment (LVIA) by ROAVR Group, dated 14 May 2026, has been provided along with strategic landscape planning input by Kevin Murphy all to inform the master plan. The design has been carefully developed to minimise landscape impact and ROAVR group consider in their LVIA that:

*“...subject to the implementation of the proposed mitigation and long-term management measures, the scheme would not give rise to unacceptable landscape or visual effects. Rather, it would introduce a more coherent, better integrated and more effectively landscaped form of development than the existing fragmented roadside condition and is therefore capable of being supported in landscape and visual terms.”*

- (iii) This is described in more detail in Section 15 of this statement.

e) **Flood Risk/SUDs**

- (i) It was noted that a Flood Risk Assessment and SUDs proposals would be required to support a planning application. This has been prepared by Paul Timmins CEng MICE of Timmins Engineering Design Services.

f) **Design and Layout**

- (i) The pre-application made various comments regarding the design and layout of the masterplan. These have all be taken into consideration and the site plan/layout adjusted accordingly as described in more detail in Section 4 below.

g) **Affordable Housing and Housing Mix**

- (i) Officers accept the provision of 35% affordable housing which aligns with HDPF Policy 16, and this would be delivered on a 70-30 ratio in favour of affordable rent over other affordable housing products such as shared ownership.
- (ii) The applicant is committed to providing an affordable rental mix which complies as far as possible with the latest SHMA, is responsive to local need and will address the demand for 3-bed affordable rental units within Pulborough, which HDC confirmed would attract “*positive weight*”. A detailed breakdown of the housing mix is included in Section 8 of this report.

h) **Impact on Amenity**

- (i) No concerns were raised in terms of likely effects on neighbouring occupiers/users of land, and this is maintained in the developed scheme.

i) **Heritage**

- (i) The impact of the proposals on the setting of the Grade II Listed Mill House to the southeast of the site, on the other side of the A29, has been assessed in a Heritage Statement by Michelle Harvey RIBA who is a Conservation Registrant and member of the IHBC.
- (ii) The statement concludes that there will be no harm to the significance or setting of Mill House and is acceptable in heritage terms, therefore demonstrating compliance with HDPF policy 34.

j) **Ecology and Biodiversity**

- (i) Detailed, site-specific ecological surveys and a Biodiversity Net Gain (BNG) Assessment have been prepared by the ROAVR Group.
- (ii) These demonstrate the protection of protected and priority species and BNG exceeding the minimum requirements.

k) **Trees**

- (i) An Arboricultural Method Statement (including Tree Impact Assessment ) by David Archer Associates, dated Marc 2026, is submitted with this application and is referred to in more detail later in Section 12 of this statement.

l) **Water Neutrality**

Whilst it was demonstrated that Water Neutrality can be achieved at the site, Natural England issued a withdrawal statement on 31 October 2025, confirming the withdrawal of its Water Neutrality Position Statement of September 2021.

The HDC website confirms that, for applicants, this means:

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1. *"No water neutrality statement is now required;*
2. *No payment into SNWCS is needed to use the Southern Water capacity referred to above;*
3. *No bespoke conditions or s106 obligations are required to demonstrate water neutrality."*

and

*"...all applications for new housing will be required by condition to comply with the Building Regulations Part G Optional Technical Standard (currently 110 l/p/d) as required by Policy 37 of the Horsham District Planning Framework."*

Water efficiencies below this standard are achievable and could be reviewed further as part of a reserved matters application.

m) **Open Space**

- (i) The masterplan has been re-designed in response to planning officer comments and now includes a variety of open space typologies throughout the development, in addition to the LEAP already proposed and in accordance with the guidance set out in the Council's Open Space, Sport and Recreation Review (OSSR) 2021.
- (ii) This is described in further detail in Section 14 of this report.

n) **Loss of Employment Uses**

- (i) It is acknowledged by the applicant that the development would result in the loss of Toat Café and adjacent car-wash business. The Planning Viability Report by Crickmay Chartered Surveyors demonstrates that *"...the site / premises is no longer needed and/or considered viable for employment use"* in accordance with Policy 9 of the HDPF.
- (ii) The loss of employment use, (approximately 4 full time equivalent members of staff associated with the café and car wash), would be limited.
- (iii) However, a pharmacy and café/shop have been added to the proposal in a prominent location at the heart of the "community hub" and are likely to result in no loss of employment within the site and would serve the community created in this location and the immediate surroundings. Furthermore, staff employed to manage the public open spaces, landscaping, SUDs features, and BNG areas in the long term would likely provide employment well in excess of the amount lost.

o) **Agricultural Land**

- (i) An Agricultural Land Classification report by Kernon Countryside Consultants (January 2026) demonstrates the site is Subgrade 3b and therefore not BMV.

- (ii) The report concludes that:

*"Planning policy in the NPPF requires that the economic and other benefits of BMV agricultural land be recognised. There is no policy that inhibits non-agricultural development of poorer quality land. As this Site is wholly poorer quality land, there is no policy limitation to its non-agricultural development for residential and biodiversity net gain development."*

p) **Mineral Safeguarding**

- (i) A Mineral Resource Assessment will be prepared as part of a reserved matters application. As the site is largely open with excellent access, it is clearly practicable to extract minerals prior to the development taking place, if appropriate and as required by West Sussex Joint Minerals Local Plan.

## **4 Development of the Design**

- 4.1 The masterplan was developed in response to the advice received from HDC in relation to pre-application reference PE/25/0141.
- 4.2 The advice notes that the indicative layout is unsuccessful for several reasons, all of which have been fully addressed in the revised design as set out below:

### **4.3 Legibility of Existing Field Boundaries**

- 4.3.1 The pre-application advice notes:

*"The layout and positioning of internal accesses, public open space, and housing does not retain a clear appreciation of the existing field-division between the northern and southern section of the site. Existing vegetation and indicative new planting is shown to be extensively contained within the rear or side gardens of prospective dwellings, such as to call into question its long term retention, while the layout and orientation of public open space, accesses and buildings within the eastern section of the site does not obviously seek to minimise or avoid effects upon existing trees and vegetation"*

- 4.3.2 The new layout more clearly retains and augments the existing field-division. The existing drainage ditch through the middle of the site is retained and a cycle/footpath, additional planting and vegetation introduced, all outside the house curtilages, thereby securing their long-term retention. This applies to the field boundaries between Stanes Farm (Character Areas 2 and 3) and Toat Café (Character Area 1). The field boundary planting and drainage ditches are also maintained between these areas and Whitelands Farm (Character Area 4). Where unavoidable, roads and footpaths bridge over the ditches and avoid tree root protection areas (RPAs).
- 4.3.3 Field boundaries around the perimeter of the site will also be outside residential curtilages and will be retained.

- 4.3.4 The above is clearly illustrated on the landscape overlay regarding “green screening” contained within the landscape strategy. These follow the line of existing field boundaries and reinstate a pre-existing field boundary around the cluster of houses to the south of the new access.



Fig 11 – Comparison of existing field boundaries on the existing site plan (left) with the proposal demonstrating their retention/enhancement (right)

#### 4.4 **Focal Point from A29**

- 4.4.1 The pre-application advice notes:

*“It is, additionally, considered that the indicative layout fails to provide for an obvious focal point leading away from the prospective access onto the A29. Units 1-20 are orientated perpendicular to the main approach to the site, while the positioning and arrangement of units 36-38 fails to appropriately ‘turn the corner’ whilst providing a visual focal point at the corner of unit 37 relative to the main site approach.”*

- 4.4.2 The design of the apartment buildings, units 1-20, (now units 71-93), have been re-designed to have a principal elevation facing the access road whilst the dwelling units 32-40 have been replaced by an apartment building (units 55-70) which include a pharmacy and shop/café at ground floor. The buildings “turn the corner” and provide principal elevations on all sides. Both blocks incorporate octagonal corner features which act as a successful focal point along the site access. Furthermore, the play area has been re-arranged and a community pavilion placed at the end of the access road as an additional focal point within this area of public open space.

4.4.3 The above is depicted on the illustrative CGI street view and street scenes below.



Fig. 12 – CGI of the site access/approach with buildings and pavilion providing a focal point in response to the pre-application advice.



Fig. 13 – Illustrative street scene of the Pharmacy, Shop/Café and apartment buildings as viewed from the site access.

#### 4.5 **Landscape Buffer**

4.5.1 The pre-application advice notes:

*"The 'set-back' nature of units 41-46 on a secondary road could provide the opportunity to retain/provide a deep landscape buffer opposite to units 1-37 and to the south-hand side of the main site approach, though, is presently compromised by the positioning of vehicular parking which itself occupies a prominent position relative to the main site approach."*

4.5.2 There is no existing landscape buffer in this location which is currently an open area of parking. Notwithstanding this, units 41-46, (now 35-40), have been set back further from the access road. The associated parking has also been re-designed and no longer occupy a prominent position.

- 4.5.3 A landscape buffer is now proposed here with tree planting and landscaped SUDs features. The buffer is circa 9-17m in width and therefore, excluding the minor storage basin, also qualifies as "natural greenspace" based on the HDC OSSR (2021) guidance.

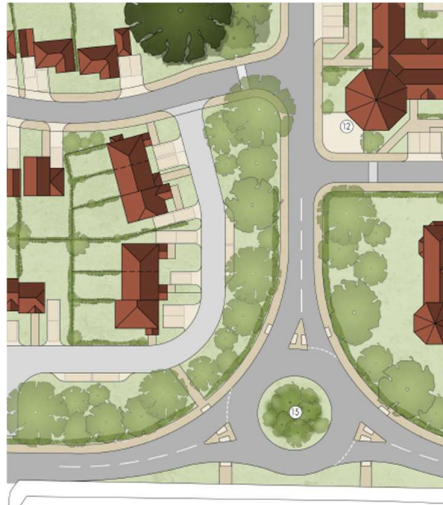


Fig 14 – Extract of the amended scheme showing the formation of a landscape buffer to the south side of the access from the A29.

#### 4.6 **Street Hierarchy**

- 4.6.1 The pre-application advice notes:

*"In respect of street hierarchy and layout it is considered that the intended hierarchy is not clearly legible. The indicated reduced width of the shared surface street forward of Units 41-46 is at odds with its continuation to service units 47-53, where access via the shared surface street represents the most direct and convenient means of access to units 47-53."*

- 4.6.2 The shared surface now serves units 35-40 and no longer forms a vehicle loop, reducing the amount of road surfacing. A pedestrian path is maintained between the two housing clusters so visiting neighbours is convenient.

- 4.6.3 The pre-application advice adds:

*"Similarly, the transition from secondary street to shared surface street south of unit 83 could occur further eastwards at the junction indicated forward of Plot 89 given that the secondary street otherwise only services 2x total dwellings."*

- 4.6.4 This shared surface now serves 5 dwellings, (nos. 1, 2, 6, 7, and 21), continuing as a private access to units 3 and 4. The secondary street referred to above has been removed.

#### 4.7 **Passive Surveillance of Public Open Space**

- 4.7.1 The pre-application advice notes:

*"The arrangement and layout of the prospective open space in relation to units 31, 32 and 40 would deny opportunities for passive surveillance of*

*indicative areas of public open space and could contribute to a perceived safety concern."*

- 4.7.2 This is accepted and the public open space has been significantly re-designed to greatly enhance passive surveillance from dwellings. An active frontage is also provided by the shop/café, associated outdoor seating, footpaths and parking areas. The pharmacy and pavilion contribute to this, albeit to a lesser extent. This is illustrated on the extract of site plan drawing 1726/P-01 below:



Fig 15 – Extract of the amended site plan drawing 1726/P-01 showing improved passive surveillance of public open space/LEAP area, illustrated with yellow arrows (shown dashed where views are filtered by vegetation)

#### **4.8 Turning Points and Bay Parking**

- 4.8.1 The pre-application advice notes:

*"It is... noted that the indicative layout incorporates a number of unnecessary turning points throughout the site as featured to streets which do not terminate in a cul-de-sac."*

- 4.8.2 The layout has been revised reducing the number of turning heads associated with the housing from five to three and are essential for the turning of fire appliances and refuse trucks.

- 4.8.3 The pre-application advice adds:

*“Areas of bay parking without clear association with any individual plot are also noted (as such opposite unit 50 and adjacent to unit 88). If intended to function at visitor parking this arrangement is undesirable as away from the bulk of proposed units and diminishes opportunities for the establishment of a landscape buffer at the perimeter of the site.”*

- 4.8.4 Visitor parking bays have been moved away from landscape buffers and are spread throughout the development amongst proposed housing.

#### **4.9 Footpaths**

- 4.9.1 The pre-application advice notes:

*“The proposed provision of footpaths within the site is noted to be frequently detached/set-back from the receiving street and often limited to one-side of the street. This arrangement limits ease of access to occupiers of plots opposite and at places where the density of development is greater (units 36-40 and units 63-66). This arrangement, therefore, is not considered ideal in terms of active travel design and would likely result in the creation of desire paths across grassed verges. It is considered preferential to increase the provision of footways to either side of internal streets where possible, and to avoid the set-back nature of pathways where currently shown. This would allow for the creation of larger private/communal gardens more sympathetic to the rural character of the site and avoid the risk of desire paths across grassed verges.”*

- 4.9.2 Whilst the intention was to reduce the number of paved areas and separate paths from roads to soften road edges, the above comments have been noted and the masterplan updated to show footpaths on both sides of all roads on the site, with the exception of the shared surfaces. The paths are also no longer set back from the road.

#### **4.10 Public Consultation (January 2026)**

- 4.10.1 A public consultation was held on 26 January 2026. Drawings of the outline proposals were placed on display and comments invited. The developer of the site, together with staff from Michael Conoley Associates (MCA), were available throughout this time to meet local residents and answer their questions.
- 4.10.2 In addition to the site plan submitted with the pre-application in June 2025, a revised site plan with changes in response to the pre-application submission were presented (drawing 1726/PC-03) which is depicted below along with an illustrative elevation of the pharmacy, shop/café and apartment building. All the public consultation supporting documents are contained in **Appendix C**.



Fig 16 – Extract from site plan drawing 1726-PC-03 presented at the public consultation. This includes amendments to the scheme in response to the pre-application advice as noted above.



Fig 17 – Extract illustrative elevation drawing 1726/PC-05 depicting the proposed southeast elevation of the pharmacy, shop/café and apartment building.

- 4.10.3 It is estimated that over 80 residents attended the event. Verbal comments were made to the staff of MCA Architects, and 17 comment forms were completed and returned and are contained in **Appendix D**.
- 4.10.4 65 letters of support were signed by local residents both prior to and at the public consultation. These are contained in **Appendix E**.
- 4.10.5 As evidenced by the letters of support and written feedback, the public response to the proposals has been overwhelmingly positive.
- 4.10.6 Below is a summary of the main comments made. A description of the changes made to the design in response to their concerns and suggestions is noted below each:

a) Traffic and Highways Safety

- (i) *Concern was raised about increased traffic on A29, Broomers Hill Lane and Blackgate Lane during construction and once the development is complete. The safety of the junction of these three roads was also raised as an issue. Some requested safety improvements to be made to Broomers Hill Lane.*
- (ii) *The Transport Statement has been prepared and confirms that "...the proposed access would be safe and suitable to serve all users..." and "...the local highway network can accommodate the traffic generated by the site during the peak periods without resulting in a severe residual cumulative impact."*
- (iii) *The provision of a roundabout was supported by residents. One resident suggested a reduced speed limit along the A29 near the site to 40mph to improve safety.*
- (iv) *The Transport Statement notes that traffic speeds where the new crossings are proposed will be significantly reduced due to the introduction of a roundabout at a point where the traffic speeds are already circa 10mph below the posted speed limit of 60mph.*

- (v) The Transport Statement findings are robust and fully supported by detailed evidence including traffic speed surveys, Road Safety Audit, "crashmap" data and consultation with West Sussex Highway Authority.

b) Café Location

- (i) *The café should face the play area.*
- (ii) The pharmacy, café/shop and apartment buildings have been re-designed to move the café, so it faces the play area and amenity greenspace.

c) Pumping Station

- (i) *Pumping station should be re-located away neighbouring properties.*
- (ii) The pumping station was positioned in the western corner of the site towards Blackgate House. This has been moved further into the site, well away from the surrounding properties.

d) Utilities/Services:

- (i) *A request was made to extend services to homes adjacent to the current Toat Café including mains gas and sewerage. Others asked for mobile phone signal to be improved locally.*
- (ii) This is outside the scope of this statement but if financially viable and appropriate could be secured as part of relevant developer contributions or carried out as part of concurrent Council funded works.

e) Footpaths

- (i) *A request was made to improve the footpaths along the A29 through maintenance and by increasing their width.*
- (ii) The suitability of the footpath along the A29 was also raised in the Council's pre-application advice. The Transport Statement notes that financial contributions can be made to improve street lighting, widening in addition to dropped kerbs and tactile paving at junctions including Broomers Hill Land and Cray Lane.
- (iii) Part of the reason the footpath appears narrow is that vegetation has been allowed to grow over the footway and therefore simply cutting this back will increase the width sufficiently in many instances.

f) Bus Stops

- (i) *Existing bus stops are not suitable and require improvement and re-locating nearer the site.*
- (ii) The proposal will provide bus stops with shelters and seating for residents immediately outside the site as noted in the Transport Statement.

g) Site Drainage

- (i) *Comments made about the need for appropriate drainage at the site.*
- (ii) The Drainage Report by Timmins Engineering Design Services demonstrates that the surface water on site will be appropriately and sustainably managed using SUDs measures.

4.10.7 Of the 16 written comments received:

- a) Six support the proposed re-development of the site
- b) Two did not support the proposals.
- c) Two were unsure/undecided.
- d) The remaining six did not declare their position.

## 5 Relevant planning history

### 5.1 "Call for Sites" submission, 2018

5.1.1 A "Call for Sites" submission in 2018 was part of the development of the Horsham District Council Local Plan.

5.1.2 This submission was prior to the introduction of the revised National Planning Policy Framework (NPPF) in December 2024.

5.1.3 The site was not included in the allocation and the reason given by the Council was that *"the site does not have the potential for allocation for housing because it is detached from Codmore Hill and Pulborough Village and other nearby settlements, with access to local services more than likely to be reliant on the private car"*.

### 5.2 Pre Application reference PE/25/0141

5.2.1 This is described in sections 3 and 4.

## 6 National Planning Policy Framework (NPPF)

### 6.1 Paragraph 11

6.1.1 *"Plans and decision should apply a presumption in favour of sustainable development...."*

*For decision-taking this means:*

- d) *"where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:*
  - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to keep policies for directing development for sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination."*

## **6.2 Housing Delivery**

- 6.2.1 The HDC Local Plan 2015 identifies a housing delivery requirement of 800 dwellings per annum (dpa). This would increase if a buffer were to be added.
- 6.2.2 The government's Housing Delivery Target (HDT) for 2021, 2022 and 2023 uses 800 dpa as a starting point which is then adjusted based on previous delivery and current planning policy for example. The result was a requirement of 2,770 homes during the three-year period ending in 2023. HDC delivered 1,726 during that period, i.e., 62% of the requirement. This stalling of housing delivery is not wholly dependent on the water neutrality issues which existed during that period and suggests depletion of supply from allocations across the district.
- 6.2.3 The result of the above is that the "presumption in favour of sustainable development" is activated, a requirement for a 20% buffer on identified supply of specific deliverable sites, and an action plan.
- 6.2.4 The HDT figures for 2024 and 2025 are to be combined by the government and, at the time of writing, are yet to be released.

## **6.3 Housing Supply**

- 6.3.1 The Council cannot demonstrate a 5-year housing land supply (5YHLS). On the 30 April 2025 in the 2023/24 Authority Monitoring Report (AMR), a 5YHLS of just 1 year was identified. Following changes to the NPPF in December 2024, the Council's 5-year supply requirement increased to 9,028 dwellings, leaving a supply deficit of 7,268 homes. In the more recent 2024/25 AMR, a 5YHS of 1.7 years was identified and a deficit of 5,286 homes.
- 6.3.2 In February 2026, the emerging local plan (2023-2040) examination was allowed to proceed. The housing requirement is therefore being assessed under the September 2023 NPPF as part of transitional arrangements set out in the December 2023/2024 NPPFs, however, there remains a shortfall for the plan period.
- 6.3.3 In the HDC Local Plan Examination document "Topic Paper: Housing Supply and Headroom – Matter 2", the council consider the housing requirement for the 2023-2040 to be 17,828, with a current supply forecast of 15,430 meaning a shortfall of 2,398 during the plan period. This however does not allow any headroom, and the shortfall may be significantly larger in line with HDC's "High Growth" option, (i.e., 13% headroom), of 20,100 dwellings, giving a 4,670-home shortfall.
- 6.3.4 Planning Inspector Jonathan Bore notes in his letter dated 5 May 2026, following the first week of hearings that:

*"The submitted plan falls short of meeting local housing need and does not contain any allowance for unmet need from neighbouring authorities... The Council will therefore need to identify further housing sites for inclusion in the plan in the interests of soundness "*

- 6.3.5 As of the Financial Year End (FYE) 2024, the Office for National Statistics identifies the district of Horsham as having a housing purchase affordability ratio of 11.45 (i.e., house price to disposable household income ratio). This is well above the median affordability ratio of 7.9 in England in FYE 2024, showing significant pressure on affordability in the district and a need for more housing.

#### **6.4 "Tilted Balance"**

- 6.4.1 In view of the HDT and 5YHLS position, policies in the Development Plan are out of date in the context of Paragraph 11(d) of the NPPF and therefore, the tilted balance is applied.
- 6.4.2 Paragraph 11 commences with *"plans and decisions should apply a presumption in favour of sustainable development"*. The application site is clearly sustainable, and the outline application submission is supported by a detailed Transport Assessment which concludes this. This assessment is further reviewed in section 9.0 of this statement.
- 6.4.3 Whilst the Local Plan policies are out of date, these, along with the pre-application advice and comments received from the public consultation, have still been used as a "road map" to inform the design of the outline application scheme. A number (but not all) of these are reviewed in this statement.

#### **6.5 Paragraph 14, 69 and 70**

- 6.5.1 *Paragraph 14:*

*"In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)."*

- 6.5.2 The PNP was adopted/made in October 2025 and therefore criterion 14(a) is satisfied.

- 6.5.3 The pre-application response, (planning reference: PRE/2025/0141), notes the following:

*"The PNP is considered to contain housing allocations sufficient to meet the identified housing needs of the Parish, accordingly, conflict with Policy 1 to the PNP is considered to engage Paragraph 14 to the Framework. This provides*

*that the adverse impact of allow development in conflict with the Neighbourhood Plan is likely to significantly and demonstrably outweigh the benefits of a housing proposal."*

- 6.5.4 The following evaluates the PNP in terms of its alignment with the NPPF, particularly in terms of meeting identified housing needs, and to evaluate the planning weight that should be attributed to the PNP in decision making.
- 6.5.5 Whilst paragraph 14(a) is satisfied, it is not agreed that paragraph 14(b) is, given the allocations contained within it are not based on the most up-to-date housing need evidence.
- 6.5.6 Whilst Policy 15 of the 2015 Local Plan sets a housing delivery target of 16,000 during the plan period (2011 -2031) with 1,500 to be delivered through allocations in the Neighbourhood Plans (NP), it does not specify how this figure should be distributed among the different NP areas and therefore no housing requirement is attributed to Pulborough NP area. Notwithstanding this, given the age of Horsham Local Plan 2015, it is now out-of-date and does not reflect current housing needs.
- 6.5.7 The PNP is also based on aged housing need assessments due in part to delays in the development and adoption of the PNP.
- 6.5.8 The PNP development was as follows:
- (i) Drafted in 2015
  - (ii) Regulation 14 pre-submission, July 2020
  - (iii) Regulation 16 Consultation, April 2021
  - (iv) Examination, September 2021
  - (v) Delay caused by Water Neutrality issues.
  - (vi) Referendum September 2025
  - (vii) Adopted October 2025.
- 6.5.9 The PNP covers a plan period between 2015 and 2031, and therefore at adoption was already 10 years into that period.
- 6.5.10 The housing allocations within the PNP are based on a 2017 AECOM assessment of the Pulborough NP area's share of the 1,500 homes. It states that the PNP should deliver 275 homes through its NP. The Site Allocations in the PNP would deliver 249 dwellings. Notwithstanding that the allocations do not meet the requirement of the 2017 AECOM report; the evidence base is 9 years old and therefore is not based on the most up-to-date evidence of local housing need. The PNP has also been adopted before the emerging Local Plan 2023-2040, and due weight must be applied to the extent of the housing shortfall elsewhere in the borough.
- 6.5.11 Paragraph 14 also notes that a conflict with the neighbourhood plan will "likely" outweigh the benefits of development, amounting to a general expectation rather than a binding rule and therefore each case should be assessed on its own merits.

The benefits of a proposal may therefore still justify approval, even if it conflicts with a neighbourhood plan. Clearly the fact the housing requirement in the PNP is based on outdated information is a material consideration along with the poor HDT and 5YHLS figures, and reduces the weight of PNP Policy 1 which outlines the strategic spatial policy for the parish and does not support housing development in North Heath. Any proposed development must clearly demonstrate that benefits outweigh the harms, especially considering housing supply pressures and the interpretation of the NP weight.

6.5.12 Paragraph 69:

*"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement."*

6.5.13 Paragraph 70:

*"Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors"*

6.5.14 A planning appeal relating to a mixed-use development with housing provision at Horsham Gold Club (HGC) provides relevant precedent in respect of the validity of housing requirements under NPs and where a scheme conflicts with the NP is permitted. The proposal at HGC conflicts with the Southwater NP (SNP) and was allowed at appeal on 4 June 2025, (appeal reference APP/Z3825/W/24/3355546, contained in **Appendix G**.)

6.5.15 With regards to the AECOM Southwater Housing Needs Assessment, and whether it constituted a valid housing requirement under paragraphs 69 and 70 of the NPPF, the inspector found significant flaws in the methodology, particularly the exclusion of need based figures, concluding that the report did not represent a housing requirement defined by the NPPF.

6.5.16 Regarding policies in the Horsham Local Plan and SNP, which protect the countryside and restrict development outside settlement boundaries, the inspector concluded:

*"The balancing of harm against benefit is a defining characteristic of the overall approach embodied in the presumption in favour of sustainable*

*development. Because of this, where Policy 26 is used to restrict housing outside settlement boundaries, it cannot be seen to be consistent with the language of the NPPF. Third, and as the Council fairly accepted, greenfield sites outside settlement boundaries (and therefore in the countryside) will need to come forward in Horsham district if housing needs are to be met."*

- 6.5.17 Notwithstanding the adopted PNP and NPPF paragraph 14(a), the PNP accepts that updates may be required to reflect changes to the draft Local Plan. The PNP at paragraph 2.4 notes the following:

*"The HDPF strategy identified a clear role for neighbourhood planning in the district in contributing to meeting local housing need. Whilst the total number of new homes needed in the district to 2031 will have to increase, their spatial distribution is not likely to change."*

- 6.5.18 However, as the inspector notes in the above appeal, sites in the countryside will need to come forward if HDS are to meet their housing needs. It is clear therefore that outdated housing figures and restrictive settlement policies cannot be relied upon to resist development where housing need is demonstrably unmet.

- 6.5.19 Whilst contrary to NPPF policy 14(a), the NPPF does not mandate that conflict with the NP must always significantly and demonstrably outweigh the benefits of the proposed development, rather, it suggests that this outcome is **likely** in typical circumstances. This is concluded in the above appeal decision where the planning inspector states:

*"...only very limited weight is afforded to policy conflicts as NPPF paragraph 14 states that conflicts with a neighbourhood plan is **likely** (my emphasis) to significantly and demonstrably outweigh the benefits, provided it is less than 5 years old and contains policies and allocations to meet its identified housing requirement."*

- 6.5.20 A recent Judicial Review (JR) decision dated 7 November 2025, Case No: AC-2025-LON-001040 and contained in **Appendix H** is also relevant on this matter. This relates to an appeal for 62 homes in the countryside in Rutland County Council. Key points to note are:

- a) The appeal was allowed despite the NP. The Parish Council challenged the decision on the basis the inspector had made an error regarding the status of the Edith Weston NP (EWNP). It was established that the inspector had made an error but had not been made aware of the referendum before issuing the decision.
- b) However, the court upheld the Inspector's decision, noting that the policies in the EWNP reflected those of the Development Plan in any event. Therefore, additional policies in the NP opposing countryside development did not increase the weight of the conflict.
- c) The JR reaffirmed the inspector's position that, given the housing shortfall, conflict with the spatial strategy carries only moderate weight.

6.5.21 Where EWNP deferred housing allocations to the Core Strategy, PNP in contrast does include site allocations, however these are based on outdated district-level figures.

6.5.22 The appeal, reference APP/A2470/W/23/3323586, which was the subject of a JR, notes (bold text MCA emphasis):

*"...the appeal scheme would cumulatively provide benefits of **at least significant weight** which would deliver positively against several policies in the Framework. **Most notably the aim to significantly boost the supply of housing, including delivery of affordable housing.** Thus, the cumulative adverse impacts of the appeal scheme would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. This indicates that on this occasion, the decision should be taken otherwise than in accordance with the development plan."*

6.5.23 As described in detail above, the conditions of NPPF Paragraph 14(b) are not met, the adverse impacts of the conflicts with the neighbourhood plan do not significantly and demonstrably outweigh the benefits, considering the proven lack of market interest in the allocated commercial uses and the abject shortfall in housing delivery and supply across the district. Therefore, Paragraph 11(d) remains engaged.

## 6.6 Paragraph 23

*"Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non- strategic policies)"*

6.6.1 Even if PNP could demonstrate sufficient allocations, the significant shortfall elsewhere in the district means a wholistic approach has not yet been taken and there is no "clear strategy" for allocating housing as required by paragraph 23. This is highlighted in the Inspectors recent comments which are repeated below:

*"The submitted plan falls short of meeting local housing need and does not contain any allowance for unmet need from neighbouring authorities.... The Council will therefore need to identify further housing sites for inclusion in the plan in the interests of soundness"*

6.6.2 The overall need for housing in the district significantly exceeds supply and delivery and permission for new housing, including affordable, should be granted.

## 7 Local Plan Policies

7.1 The site is located in Countryside just outside the built-up area of Pulborough and Codmore Hill.

- 7.2 Below are relevant extracts from the Horsham District Planning Framework 2015 (HDPF):

### **7.3 Chapter 4: Policies for Growth and Change**

- 7.3.1 *"The amount of brownfield land in the district is relatively limited, but there is still a need to prioritise this land for development where possible"*
- 7.3.2 A substantial portion of the site is brownfield land which would include all of the Toat Café and car wash facility (Character Area 1) and a substantial portion of Character Area 2 which includes Stanes Cottage and the 5 residential caravans.
- 7.3.3 *"In order to ensure that this growth and change can take place, the policies in this chapter set out a hierarchy in which development can take place, with the priority on locating new homes, jobs, facilities and services at Horsham and where appropriate the smaller towns and villages, particularly through the re-use of previously developed land."*
- 7.3.4 As noted above, a substantial portion of the site is "previously developed land" (PDL). Where it is not, such as Character Area 3 and portions of Character 2 which were previously in agricultural use, there is no formal use now apart from small scale storage in the barns in Character Area 2 (Stanes Farm).

### **7.4 Policy 1: Strategic Policy - Sustainable Development**

- 7.4.1 *"When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area."*

*Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.*

*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission, unless material considerations indicate otherwise – taking into account whether:*

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted."*

- 7.4.2 This is addressed in Section 6 in the context of housing delivery and supply in the district and the resulting application of the "tilted balance".

## 7.5 Policy 2: Strategic Development

7.5.1 This policy makes the focus for strategic development *"in and around the key settlement of Horsham"*, highlighting three strategic development areas for housing:

- 2500 north of Horsham Town
- 600 west of Southwater
- 150 south of Billingshurst

7.5.2 For the remainder of the district, growth is required to accord with the settlement hierarchy. (Policy 15 notes *"at least 1500 homes"*).

7.5.3 The above policy is outdated given the Council's shortfall in housing delivery and supply.

7.5.4 Other relevant elements of this policy include:

- a) *"Manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape."*

The application site is only 535m from Codmore Hill which merges with Pulborough, and it is less than 300m (from the southwest edge of the site) to the revised built up area boundary (BUAB) in the PNP. As the Transport Assessment notes, it is only a short walk along level pavements to the application site and there are bus stops nearby which will be improved and moved opposite the site.

The rural character and landscape are preserved and enhanced by the development as reviewed in the LVIA and Landscape Strategy Reports.

- b) *"Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value."*

This is relevant in relation to the Toat Café buildings and hardstanding, Stanes Cottage and agricultural buildings which constitute PDL.

As previously noted, a significant portion of the site is PDL but none of it is of high environmental value. A preliminary ecological appraisal supports this outline application along with further reports by ROAVR Group and is further reviewed in Section 13 of this statement. This reviews the habitats within the site and notes that the proposed development should be able to proceed subject to enhancements and mitigation.

- c) *"Continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period"*

The development would form part of a string of existing development along the A29 between Pulborough and Billingshurst and is of a scale comparable with the existing development pattern. This is further reviewed in section 15.

- d) *"Guide development form and provide access to strategic green space and recreational opportunities in and around the built-up urban areas."*

Green Infrastructure and Multifunctional Greenspace are at the heart of the proposed development as detailed later in this statement and within the Landscape Strategy report by Kevin Murphy Landscape and Garden Design.

- e) *"Identify existing sites of important employment use, and to safeguard their function through flexible policies and designation of Key Employment Areas, together with supporting the rural economy, to allow people the opportunity to work close to where they live"*

As noted in the Transport Assessment (TA) by Bellamy Roberts (BR), the site is close to existing employment opportunities. Furthermore, new employment uses are introduced which will result in no net loss of employment and will serve the proposed development.

- f) *"Support the provision of rural housing which contributes towards the provision of affordable housing where there is a demonstrable need"*

As noted in section 6 of this statement, there is a demonstrably unmet need with regards to housing supply and this scheme will be a meaningful contribution to this shortfall, including for the supply of affordable housing in line with local need as demonstrated in section 8.

## **7.6 Policy 3 - Strategic Policy: Development Hierarchy**

### **7.6.1 Paragraph 4.6 notes that**

*"The HDPF seeks to ensure development takes place in a manner that ensures that the settlement pattern and the rural landscape character of the District is retained and enhanced, but still enables settlements to develop in order for them to continue to grow and thrive. The mechanism by which this will be achieved is through the designation of built-up area boundaries and the planned expansion of existing settlements through the Local Plan or Neighbourhood Planning."*

### **7.6.2 Paragraph 4.7 adds that**

*"Within built-up area boundaries development is accepted in principle, whereas land outside these boundaries is considered to be in the countryside and development will be more strictly controlled."*

### **7.6.3 An inspection of the proposed design clearly demonstrates that the rural landscape character will be not just preserved but considerably enhanced by the provision of a substantial number of additional trees and hedges, particularly along the eastern boundary of the site which is currently bleak being characterised by a substantial car park, the transport café and the car wash. The landscape will also be enhanced by the removal of Stanes Cottage, the unattractive barns at Stanes Farm and the mobile homes. Furthermore, existing field boundaries will be maintained and reinforced along with existing drainage features which maintain the landscape character.**

- 7.6.4 Within Policy 3, Pulborough and Codmore hill are classed as "Small Towns and Larger Villages" under the HDPF development Hierarchy and are defined as follows:

*"These are settlements with a good range of services and facilities, strong community networks and local employment provision, and together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements / each other to meet some of their requirements."*

- 7.6.5 Whilst it is proposed to provide all new housing through utilising brownfield sites within Built-Up Area Boundaries (BUAB) or for expanding at the edge of settlements or connected to them, this policy has proved to be inadequate given the housing delivery and inability to provide a 5YHLS. Notwithstanding this, the application site is within 300m of the revised BUAB contained in the PNP and 535m from the BUAB as defined in the HDPF.

## **7.7 Policy 4 - Strategic Policy: Settlement Expansion**

- 7.7.1 *"The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;*

*"1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge..."*

It is recommended that the site is allocated in the emerging Local Plan and there is a need, as noted by the appointed Planning Inspector, to identify further housing sites for inclusion in the plan in the interests of soundness. As noted in section 6, the PNP is based on an outdated assessment of housing need and, as the report by Crickmay demonstrates, there is no reasonable prospect of the site being brought into the uses allocated within it.

- 7.7.2 *"...2. The level of expansion is appropriate to the scale and function of the settlement type..."*

The scale of the development is appropriate as demonstrated in section 16.

- 7.7.3 *"...3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services..."*

The proposed development will contribute towards the current housing shortfall and provide improved community facilities and services in the form of a pharmacy, shop and café.

- 7.7.4 *"...4. The impact of the development individually or cumulatively does not prejudice comprehensive long-term development, in order not to conflict with the development strategy..."*

The site's proximity to the BUAB is broadly in line with the long-term development plan of the District, and given the shortfall in housing and the planning inspector's comments in relation to the emerging Local Plan, the development strategy should

include the development of sites outside the BUAB to meet the abject housing supply shortfall.

- 7.7.5 *"...5.The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced..."*

The site objectively benefits from substantial existing defensible boundaries which will be extended across Character Area 1. Informal housing clusters placed within existing field boundaries and denser development focussed within Character Area 1 where there is a significant portion of PDL, together with maintaining, significantly enhancing and extending Green Infrastructure across the site, will ensure the landscape and townscape character features along the A29 are maintained and enhanced in line with this policy requirement.

## 7.8 **Policy 16 - Strategic Policy: Meeting Local Housing Needs**

1. *"Development should provide a mix of housing sizes, types and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities.*
2. *The appropriate mix of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and the viability of the scheme.*
3. *In order to meet the proven needs of people who are not able to compete in the general housing market, all residential developments of 5 dwellings or more will be expected to include an appropriate proportion of affordable homes in accordance with the following thresholds and targets:*
  - a. *On sites providing 15 or more dwellings, or on sites over 0.5 hectares, the Council will require 35% of dwellings to be affordable..."*

- 7.8.1 The proposed housing mix is reflective of the Strategic Housing Market Assessment providing a range of 1, 2, 3 and 4 bedroom dwellings. In addition, 35% of these dwellings will be affordable and the mix of Affordable Rent and other low-cost housing reflects the identified local need as reviewed in section 8.

## 7.9 **Policy 26 - Strategic Policy: Countryside Protection**

- 7.9.1 This policy aims to protect the countryside from inappropriate development and requires development to be essential to its countryside location meet one of the following criteria:

- "1. Support the needs of agriculture or forestry;*
- 2. Enable the extraction of minerals or the disposal of waste;*
- 3. Provide for quiet informal recreational use; or*
- 4. Enable the sustainable development of rural areas. "*

- 7.9.2 The proposals would meet the requirement of items 3 and 4 as it provides a variety of open spaces for informal recreational use (See section 14) and provides a sustainable residential development that contributes towards demonstrable need.

7.9.3 The requirement to be “essential to its countryside location” is out of date as it restricts the supply of housing where there is a demonstrable unmet need.

7.9.4 The policy also notes:

*“...proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including;*

- 1. The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;*
- 2. The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and*
- 3. The landform of the area.”*

7.9.5 The scale of development responds to the countryside character and location, with regard to the existing urbanising influence of the A29 development corridor. Activity will not be significantly increase given the existing roadside café, car wash and existing residential uses on the site and the activity which would result if the allocated commercial uses were delivered.

7.9.6 Key features and characteristics of the landscape character area including the three items listed above are protected, conserved and enhanced by the development as reviewed in detail within the LVIA and Landscape Strategy.

## **7.10 Policy 27 - Strategic Policy: Settlement Coalescence**

7.10.1 *“Landscapes will be protected from development which would result in the coalescence of settlements.*

*Development between settlements will be resisted unless it can be demonstrated that:*

- 1. There is no significant reduction in the openness and 'break' between settlements”.*

Much of the application site is already reasonably visually enclosed within a significant tree screen on its north, west and south boundaries. The proposals are designed to create a significant landscape barrier between Stanes Street and the eastern edge of the proposed development. This is created by significant existing and new tree and shrub planting of indigenous species. The site does not reduce the 'break' between settlements by causing coalescence. There is a significant landscape/countryside barrier between Codmore Hill to the south and the nearest settlements to the north.

- 2. “It does not generate urbanising effects within the settlement gap, including artificial lighting, development along key road corridors, and traffic movements”.*

Artificial lighting will be kept to a minimum with much of it being low level pointing towards the ground. It should be noted that there are already significant traffic movements on the site relating to the Toat Café, associated caravans, Stanes Cottage and mobile homes, which will be balanced against those proposed for the residential development. Further information in relation to this is contained in Section 9 of the Transport Assessment."

3. *"Redevelopment of existing sites that seek to reduce the existing urbanised character and appearance of an area between settlements, particularly along road corridors, will be supported."*

Much of the existing site adjacent to Stane Street is already developed which includes the car wash, transport café, substantial car park, Stanes Cottage, the 5 mobile homes and Stanes Farm barns, the latter two of which are not visible due to existing tree screening although the former are. However, the urbanising impact of the existing transport café, car park and car wash will be radically improved by the provision of a substantial street buffer as depicted on the proposed site plan.

4. *"Proposals contribute to the conservation, enhancement and amenity of the countryside, including where appropriate enhancements to the Green Infrastructure network or provide opportunities for quiet informal recreation."*

As noted above, substantial Green Infrastructure including MFGS for recreational use are provided, including a large area of off-site BNG land, and will therefore enhance the amenity of the countryside.

## **7.11 Consistency of HDPF Policies with Emerging Policies and Weight of both.**

- 7.11.1 The pre-application advice considers the spatial approach of the above policies to be "largely consistent" with emerging policies 2, 3 and 14 of the submission Horsham District Local Plan (HDLP). However, as noted above, the planning inspectors' comments with regards to the HDLP and the housing delivery and supply shortfalls demonstrate that further review of the spatial strategy is required to enable the district to meet its demonstrable housing need.
- 7.11.2 Notwithstanding the broad compliance with the adopted and emerging spatial strategy of the district, the pre-application advice acknowledges that the existing and emerging spatial policies, and therefore any conflict with them, are attributed *"greatly reduced weight"*. Limited weight is also applied to the emerging policies which require further work to make them sound in planning terms.
- 7.11.3 Furthermore, the concluding comments of the pre-application advice accept that the re-use of PDL, and the contribution to the delivery of housing including affordable would attract *"substantial weight in favour of the grant of planning permission"* with the provision of public open space also attracting positive weight.

## **7.12 Pulborough Neighbourhood Plan (PNP)**

- 7.12.1 The PNP was first drafted in 2015 and was the subject of successful Examination. Adoption was delayed due to the legal requirements relating to water neutrality and Habitat Regulations. The PNP was 'made' in October 2025.

## 7.12.2 Policy 1:

*"The Neighbourhood Plan defines the Built-up Area Boundary of Pulborough, as shown on the Inset Map. Development proposals located inside this boundary will be supported provided they accord with the other provisions of the development plan. Development proposals outside of this boundary will be required to conform to development plan policies in respect of the control of development in the countryside."*

- 7.12.3 Below is an extract from the PNP Policy Map with the site outlined in red. This shows the site's close proximity to Pulborough and the amended BUAB edge of Codmore Hill. The BUAB has been extended in the PNP for the purposes of the Policy 7 allocation of commercial uses.

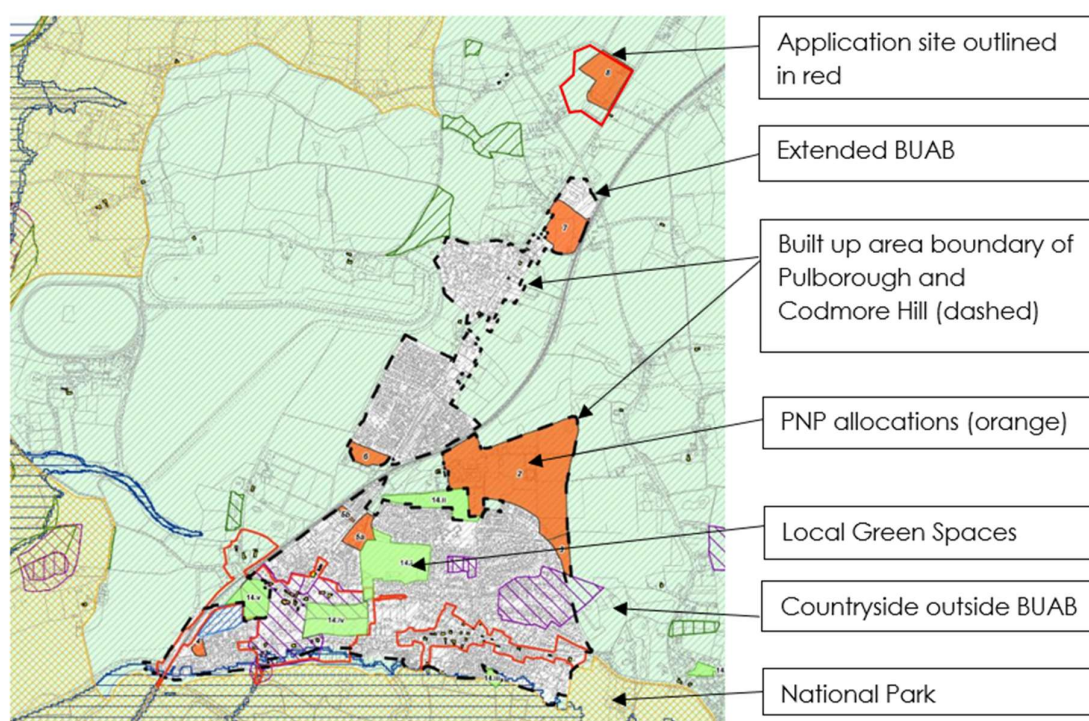


Fig 18 – PNP Policy Map extract

- 7.12.4 Item 4.6 establishes a spatial strategy of defining the built-up area boundary (BUAB) around Pulborough, including Codmore Hill, *"to direct housing and other development within the boundary"* and resisting development in the countryside.
- 7.12.5 However, as conceded by HDC in the context of the HGC appeal, *"... greenfield sites outside settlement boundaries (and therefore in the countryside) will need to come forward in Horsham district if housing needs are to be met"*. Furthermore, a large portion of the site is previously developed land and has an allocation for commercial development and being adjacent to the A29 transport corridor is far less sensitive than other greenfield sites in the borough.

7.12.6 Part of the application site is incorporated within the Pulborough Neighbourhood Plan, Policy 8.

7.12.7 An extract of the PNP allocation plan depicting the portion of the overall site which is in the NHP is shown below:-



Fig. 19 – extract from NHP allocation plan

7.12.8 This allocation allows the following use classes:-

- B2** General Industrial
- B8** Storage and Distribution
- C1** Hotels
- E** Commercial, Business and Service
  - Sale of goods, sale of food and drink for consumption on premises,
  - Professional and Financial Services
  - Indoor sport & recreation (not ice rink, swimming pool, motorised vehicles)
  - Medical and Health services
  - Creche/Day Nursery
  - Uses which can be carried out in a residential area without detriment to its amenity: offices for admin, research and development, industrial
- F1** Learning: inc. education, art, museums, library, halls places of worship, courts
- F2** Local Community: Shops for essential goods, halls/meeting places, outdoor sport, indoor or outdoor swimming and ice-rinks.

7.12.9 As demonstrated in section 3, there is insufficient market interest in the site following a robust 2-year marketing campaign by Crickmay. This significantly reduces the weight that should be applied to Policy 8 by decision makers.

- 7.12.10 As noted in Section 6 above, the evidence base for determining housing need in the PNP is 9 years old and therefore out of date. At least significant weight must also be applied to the extent of the housing shortfall elsewhere in the borough.

### **7.13 Water Neutrality**

- 7.13.1 On 31 October 2025, Natural England confirmed that its Water Neutrality Position Statement of September 2021 has been withdrawn.

- 7.13.2 In light of the above, HDC note on their website that:

*"For individual applications, we will now be using the 2024/25 water efficiency savings made by Southern Water to allow all development to move forward as water neutral from 1<sup>st</sup> November 2025. These savings were previously to be used by the Sussex North Water Certification Scheme (SNWCS), and amount to some 3,240,000 litres per day. SNWCS, for the avoidance of doubt, will no longer be launched."*

*"For applicants, this means that:*

- 1. No water neutrality statement is now required;*
- 2. No payment into SNWCS is needed to use the Southern Water capacity referred to above;*
- 3. No bespoke conditions or s106 obligations are required to demonstrate water neutrality.*

*Please note that given the area remains at significant water stress, all applications for new housing will be required by condition to comply with the Building Regulations Part G Optional Technical Standard (currently 110 l/p/d) as required by Policy 37 of the Horsham District Planning Framework."*

- 7.13.3 Therefore, a Water Neutrality Statement has not been submitted with this application.

## **8 Design and Layout**

- 8.1 The proposed development comprises the removal of all existing buildings and areas of hardstanding on the site, the provision of a new access and the development of 93 houses and flats, (including 35% affordable), shop, café, pharmacy and public open space.

### **8.2 Landscape-led masterplan**

- 8.2.1 The Landscape Strategy has been at the centre of the masterplan design development. The landscape strategy is explained and illustrated in detail within the report by Keving Murphy Landscape and Garden Design.

- 8.2.2 The masterplan has been developed to maintain, enhance and create Green Infrastructure, i.e., natural screening, landscape buffers and green corridors, and a series of open spaces including Multi-functional Greenspaces, incorporating SuDs

measures and play areas, all of which provide a green rural framework in which informal housing clusters and a Community Hub (CH) are placed. The CH comprises a pharmacy, shop and café within apartment buildings, facing public, open amenity and natural greenspace, play areas and links to off-site BNG land.

- 8.2.3 The above incorporates the recommendations of the LVIA by ROAVR group to ensure acceptable Landscape and Visual impacts.
- 8.2.4 A new roundabout from the A29 is proposed which slows traffic and provides safe access to the site. Following pre-application discussions with the County Highways Authority, no objections to the proposed access were made. The Community Hub is visible from the access, providing a focal point on entry into the development.
- 8.2.5 The café and will provide a meeting place for local residents and together with the pharmacy will enable residents to conveniently purchase essentials without the need to travel.
- 8.2.6 Provision for children and young people is provided through Multi-Functional Greenspaces (MFGS), LEAP and a mountain bike technical skills area (MBTSA) positioned with easy access from all parts of the development. MFGS and the offsite BNG land will be attractive to all residents within the development by offering recreational opportunities such as walking and engagement with biodiversity through access to a variety of natural greenspaces.
- 8.2.7 Below is an extract from drawing 1726/P-01 depicting the proposed masterplan as submitted with this outline planning application:



Fig. 20—Extract from Proposed Site Plan, drawing 1726/P-01

### 8.3 Amount and Scale

- 8.3.1 There are 39 flats within two apartment buildings and 54 houses with a mix of detached, semidetached and small terraces.
- 8.3.2 All the buildings on the site will be two storeys, some with rooms in the roof. They will be individually designed and provide habitable accommodation exceeding the Nationally Described Space Standards.

### 8.4 Appearance

- 8.4.1 There will be varying building styles and forms redolent of the overriding character of the area and local Sussex vernacular using locally prevalent materials including stone, red bricks, clay tile hanging and roof tiles and render. The proposed buildings will reflect the development principles of HDPF Policy 33 and the requirements of Policy 15 of the PNP which states that:

*"The scale, density, massing, height, landscape design, layout and materials of all development proposals...will be required to reflect the architectural and historic character and scale of the surrounding buildings and landscape, as detailed in the Pulborough Design Statement...."*

- 8.4.2 Extracts from illustrative elevations to indicate the materiality and high design quality intended for this development are included with this application and depicted below:



Fig. 21– Illustrative street scene of the Pharmacy, Shop/Café and apartment buildings as viewed from the site access. (Drawing 1726/P-04)



Fig. 22– Illustrative street scene of units 16 – 20 (Drawing 1726/P-05)

- 8.4.3 The existing green screening and landscape buffer between the site and the A29 will be maintained and reinforced by retaining trees and vegetation and planting more, in particular to the open frontage that currently exists at the Toat Café. An extract of the illustrative proposed street scene from Stane Street is depicted below:



Fig. 23– Illustrative street scene from Stane Street (Drawing 1726/P-06)

- 8.4.4 The masterplan design is a product of the development of the pre-application scheme in response to specific comments raised in the pre-application advice and community consultation. These are described in detail in section 4.

- 8.4.5 Off site BNG land of sufficient size, and the resulting metric achieved, i.e. well in excess of the minimum 10% requirement, means that some of this land could be utilised for on-site SuDs measures, the MFGS and MBTSA.

## 8.5 Density

- 8.5.1 The proposal comprises the erection of 93 residential dwellings which are a mix of houses and flats within a site area of 6.3 ha. This results in a density of 15 dwellings per hectare.
- 8.5.2 The above density is the average across the site (red line boundary). The masterplan shows that denser development is concentrated upon the PDL at the Toat Café which is allocated for various commercial uses within the PNP (Character Area 1). Here, the density is 21 dwellings per hectare. This density is reduced within Stanes Farm (Character Areas 2 and 3) to 13 dwellings per hectare. These are suitable densities within a rural context and given the pattern of development along the A29.

## 8.6 Amenity

- 8.6.1 No concerns were raised in the pre-application advice with regards to amenity.
- 8.6.2 The updated scheme maintains appropriate distances between dwellings to avoid overlooking.

## 8.7 Housing Mix

- 8.7.1 The proposal commits to a 35% provision of affordable housing with a 70-30 ration in favour of affordable rent, in line with HDPF Policy 16 and the Strategic Housing Market Assessment (SHMA). Furthermore, the recommended spread across various categories and sizes of tenure, as set out in the strategic conclusions of the SHMA, have been followed. It was noted at pre-application stage that this had not been made clear, noting:

*"...were the applicant minded to pursue a formal application, the Council would expect a housing scheme to demonstrate substantial compliance with the recommendations of the SHMA in respect of the provision of market housing and shared ownership."*

- 8.7.2 The recommended mix as noted in the SHMA was included in the pre-application advice and is included below:

|          | Market | Low Cost Housing | Affordable Rent |
|----------|--------|------------------|-----------------|
| 1-bed    | 5%     | 25%              | 35%             |
| 2-bed    | 30%    | 40%              | 30%             |
| 3-bed    | 40%    | 25%              | 25%             |
| 4(+)-bed | 25%    | 10%              | 10%             |

Fig 24 – Table indicating recommended SHMA mix as included in the pre-application advice.

8.7.3 However, the officer added that, with regards to affordable rent:

*“...the Council would attribute positive weight to an affordable rent mix which was best responsive to local need and which specifically sought to address the significant unfulfilled demand for 3-bed affordable rental units within Pulborough”*

8.7.4 The pre-app response stated that 160 households are recorded on the housing register waiting list for Pulborough, broken down as follows:

- (i) 44 awaiting 1-bed units (27.5%)
- (ii) 42 awaiting 2-bed units (26.3%)
- (iii) 54 awaiting 3-bed units (33.8%)
- (iv) 20 awaiting 4-bed units (12.5%)

8.7.5 The housing mix adopted for this outline application has been revised and the mix clarified all in response to the pre-application advice received. The revised mix is summarised in the table below:

| Overall     | Market (M) |         | Affordable (A) |         |                      |         | ALL   |          |
|-------------|------------|---------|----------------|---------|----------------------|---------|-------|----------|
| Total Units | 60         |         | 33             |         |                      |         | 93    | Units    |
| %           | 65         |         | 35             |         |                      |         | 100   | %        |
| Breakdown   |            |         | Low Cost (LC)  |         | Affordable Rent (AF) |         |       |          |
|             |            |         | (LC 30% of A)  |         | (AF 70% of AF)       |         |       |          |
| Type        | Units      | % of M  | Units          | % of LC | Units                | % of AF | Units | % of All |
| 1-bed       | 3          | 5.0     | 3              | 30.0    | 6                    | 26.1    | 12    | 12.9     |
| 2-bed       | 19         | 31.7    | 4              | 40.0    | 6                    | 26.1    | 29    | 31.2     |
| 3-bed       | 24         | 40.0    | 2              | 20.0    | 8                    | 34.8    | 34    | 36.6     |
| 4-bed       | 14         | 23.3    | 1              | 10.0    | 3                    | 13.0    | 18    | 19.4     |
| Total       | 60         | 100     | 10             | 100     | 23                   | 100     | 93    | 100      |
|             |            | Check % | 30             | %       | 70                   | %       |       |          |

Fig 25 – Table demonstrating the mix achieved in line with SHMA recommendations and current housing need.

8.7.6 The above mix meets Policy 16 of the HDPF by providing a mix of housing sizes, types and tenures to meet the needs of the district as evidenced in the latest SHMA. Furthermore, this mix can be varied if required when dealing with reserved matters and to suit the latest housing need at that time.

## 9 Transport

9.1 A **Transport Assessment** and **Framework Travel Plan** have been provided by Bellamy Roberts. These clearly demonstrate that the outline application proposals are acceptable in highways terms. The development has been assessed against the four key tests within the NPPF and local transport policies.

9.2 The Transport Statement demonstrates, in accordance with NPPF paragraph 115, that:

- a) *"There are genuine opportunities for residents and visitors to travel to/from the development site using sustainable modes of transport;*
- b) *The proposed access would be safe and suitable to serve all users;*
- c) *The parking provision and road layout reflects current national and local guidance;*
- d) *The local highway network can accommodate the traffic generated by the site during the peak periods without resulting in a severe residual cumulative impact."*

and concludes:

*"...there are no highway-related constraints that would impede development of the application site as proposed, for up to 100 dwellings."*

9.3 The report further notes that development should not be resisted on transport grounds as the residual cumulative impacts are not severe and safety impacts have been shown to be acceptable in consultation with the Highways Authority. (NPPF paragraph 116).

9.4 Further analysis and justification of the proposals is included, directly addressing the comments raised by officers in connection with the planning pre-application. This includes:

9.4.1 Engagement with the Highway Authority.

- a) Bellamy Roberts (BR) consulted West Sussex County Council (WSCC) County Highways Team thorough a highways pre-application submission which has informed the proposals. WSCC made no objections to the proposals.

9.4.2 Completion of a Road Safety Audit (RSA)

- a) This has been completed and is included in the BR report appendices.

9.4.3 Compliance with HDPF policy 40 and NPPF paragraph 110

- a) The pre-application advice did not consider there to be a genuine choice of travel resulting in a high dependence on the use of the private car.

- b) In response, the TA notes that in addition to walking and cycling:

*"...the proposed development may be capable of making an appropriate financial contribution towards improving bus services in the vicinity of the site, thereby ensuring compliance with the provisions of the policy. Enhanced public transport provision would enable future residents to access nearby facilities, services and employment opportunities by a range of sustainable transport modes, reducing reliance on the private car and supporting the objectives of sustainable travel."*

- c) *"The application site is located within a rural/suburban area. This has been taken into account when considering sustainable transport opportunities of the site"*

#### 9.4.4 Bus Provision

- a) Improvements to bus stop provision are proposed, including their re-location adjacent to the site and provision of a rural shelter.
- b) As noted above, the appropriate financial contributions towards improving bus services could be made.

#### 9.4.5 Suitability of the existing footpath

- a) The pre-application advice raised concerns about the width and lighting of the existing footway and its location on the opposite side of the road relative to the site. However, as noted in the TA:

*"Provisions may need to be made to widen the footway on the east side of the A29/Stane Street to accommodate all users including cyclists and pedestrians with push/wheelchairs, providing an attractive and direct route for residents towards Codmore Hill and Pulborough."*

*"...financial contributions can be made towards improving street lighting along the footway on the A29 to provide a safe, accessible and visible route for pedestrians as well as providing dropped kerbs and speed and frequency of traffic range of facilities in Pulborough"*

*"The scheme proposed provides safe crossing paths for pedestrians and cyclists at a point where traffic speeds will be significantly reduced."*

#### 9.4.6 Speed and frequency of traffic

- a) The pre-application advice considers *"The condition of and speed/frequency of passing traffic on the A29 is not considered to render this an attractive route for walkers and cyclists, and in particular for older/younger groups and those with additional needs."*

- b) The TA rebuts this by highlighting the following:

*"... there are no objections to the scheme at Toat Café being made by County Highway Authority. The scheme proposed provides safe crossing paths for pedestrians and cyclists at a point where traffic speeds will be significantly reduced. Currently traffic speeds are circa 10mph below the posted speed limit of 60mph. The proposal should also provide bus stops with shelters and seating for residents immediately outside the site, being very convenient for future residents."*

#### 9.4.7 Range of Facilities in Pulborough.

- a) The pre-application advice notes *"Pulborough itself, further, does not afford a full range of employment, educational, healthcare and leisure opportunities"*

*such that reliance on travel beyond the settlement and facilities beyond frequent walking/cyclist distance would remain"*

- b) BR refutes the above, noting:

*"...the pre-app TS response... indicates that Pulborough does not provide a full range of facilities. However, Policy 3 of the Horsham District Planning Framework identifies Pulborough and Codmore Hill as settlements that offer a "good range of services and facilities, strong community networks and local employment provision."*

*"The NPPF does not require all sites to be accessible to all facilities by all travel modes. Evidently, accessibility has much more meaning than simply appraising what facilities maybe within a short walk or cycle ride of the scheme and instead should be considered in the round and take into account all relevant matters and opportunities in the context of what the NPPF states (NPPF paragraph 115)."*

#### 9.4.8 Sustainable Location and Travel by Sustainable Modes

- a) These items are addressed in detail within Section 4 of the TA by BR.
- b) *"The NPPF does not require all sites to be accessible to all facilities by all travel modes. Evidently, accessibility has much more meaning than simply appraising what facilities maybe within a short walk or cycle ride of the scheme and instead should be considered in the round and take into account all relevant matters and opportunities in the context of what the NPPF states (NPPF paragraph 115).*
- c) *"It is clear that the proposed site with the contribution of the mitigation schemes would fall full square in the definition of a sustainable site."*

#### 9.4.9 Active Travel England Guidance

- a) *"The local Council make reference to Active Travel England (ATE), however ATE are not consulted on residential development below 150 dwellings as in this case. Active Travel can be promoted through this site and as advised by the NPPF, sustainable transport modes can be provided at this site."*

#### 9.4.10 Tissarand Farm Appeal (Planning Ref DC/21/1571)

- a) The pre-application advice compared this proposal with the above application, which was dismissed at appeal. The refusal relates to the County Highway Authority not being satisfied with the access arrangement, access to buses and the speed of the A29.
- b) However, as noted in the TA, applications should be considered on their own merit and there have been no objections to the proposals at the Toat Café by the County Highway Authority where safe access is provided and convenient access to buses.

## **10 Flood Risk/SUDs**

- 10.1 A Drainage Report including a flood risk assessment and SUDs strategy has been prepared by Paul Timmins CEng MICE of Timmins Engineering Design Services.
- 10.2 The site is in Flood Zone 1 with limited areas of surface water flooding which correlate with ditches provided to drain the land.
- 10.3 The site is to drain to existing ditches as is currently the case with SuDs incorporated to ensure discharge from the site is limited to the same value as existing. These include a network of ditches, swales, and different size detention basins.
- 10.4 SuDs features are carefully integrated into the landscape and avoid unsightly engineering features. The design fully complies with the National Standards for Sustainable Drainage Systems (2025), including those relating to amenity and biodiversity.
- 10.5 The report addresses all points raised in the pre-application response and complies with policy 38 of the HDPF and paragraphs 175, 177, 178 and 181 of the NPPF.

## **11 Utilities/Services**

- 11.1 A foul sewer and Southern Water pumping station is located to the southwest of the site. A pre-development enquiry will be submitted to Southern Water to establish whether any improvements works are necessary. Southern Water are obligated to provide capacity where a development proposal is granted planning consent, and part of the site is already allocated for various commercial uses.
- 11.2 The string of developments between Pulborough and Billingshurst along the A29 together with the allocation of the site for commercial uses, make the availability and capacity of other existing services highly likely. Where required, suitable mitigation arrangements or improvements will be made. Any extra capacity would be provided in time to serve the development or relevant phase. New or improved infrastructure provision would be secured by planning obligations, CIL or planning condition all in accordance with Policy 39 of the HDPF.

## **12 Trees**

- 12.1 This outline planning application has been prepared with careful consideration in relation to the impact and provision of trees.
- 12.2 The pre-application advice noted that retained trees were shown within private gardens which could compromise their long-term retention. This has been addressed in the updated scheme, and no retained trees are located in private gardens.
- 12.3 The remaining concerns were a result of a tree report not being submitted with the pre-application.
- 12.4 An Arboricultural Method Statement (including Tree Impact Assessment ) by David Archer Associates, dated March 2026, is submitted with this application. This

demonstrates that nearly all existing retained trees will be retained and protected during the course of the development.

- 12.5 The number of existing trees on the site is over a hundred and the loss of existing trees has been minimised as far as possible. The Arboricultural Assessment identifies that fifteen trees will be removed as part of the proposals. These are all low quality and value (grade C or U).
- 12.6 The report notes that: *"With the proposed mitigation measures as mentioned above, and the methodology of tree protection...the proposals will not compromise the retained trees' health or longevity."*
- 12.7 New trees will be planted as part of the proposals. These new trees will enhance the boundaries and Green Infrastructure of the site and, together with retained existing trees, screen the development, preserve and augment field boundaries and conserve the landscape character. As noted in the LVIA, the long-term success of the new tree planting will be achieved by the implementation of a Landscape and Ecological Management Plan (LEMP) which can be secured by condition.
- 12.8 Therefore, the scheme is in accordance with Paragraph 136 and 187(b) of the NPPF and HDPF Policy 33 by retaining existing important landscape features including trees and hedges and recognising the important contribution they make to the character and quality of urban environments, the intrinsic character and beauty of the countryside including the ecosystem services it fulfils.

### **13 Ecology**

- 13.1 A Preliminary Ecological Appraisal (PEA) Report was provided by "enims" and concludes: "subject to the mitigation, enhancement measures and further surveys (and any mitigation recommended) outlined in this report, the proposed development should be able to proceed as indicated in the master plan drawings" (1726/SP-01 and 1726/SP-02). Further survey work has been carried out by ROAVR Group and the results of these are included in the application.
- 13.2 A minimum statutory requirement of 10% Biodiversity Net Gain (BNG) must be achieved by the development. A BNG assessment and Statutory Biodiversity Metric have been prepared by ROAVR Group and demonstrate that the net percentage change in Habitat units in connection with the proposed development is 21.19 % and for hedgerow units is 10.55%. Therefore, the requirements are met and are well in excess of the minimum requirements for habitat units.
- 13.3 BNG units are acquired off-site on part of the neighbouring land at Whitelands Farm and onsite within natural greenspace and green corridors.
- 13.4 There are over 100 existing trees on the site of which only 15 very poor-quality grade C and U trees are to be removed, and over 100 new trees planted. Existing green corridors are maintained and enhanced on land outside residential curtilages, conserving and enhancing habitat connectivity beyond the site.

## 14 Open Space

- 14.1 The provision of open space is central to the design of the proposed development as a key component of the landscape led masterplan.
- 14.2 At pre-application stage, the scheme included some open space provision along with a large locally equipped area for play (LEAP). The planning officer commented that more varied provision should be provided to meet a variety of open space needs, as detailed in the Council's Open Space, Sport and Recreation Review (OSSR) 2021, and should reflect the identified needs of a community.
- 14.3 The OSSR provides detailed guidance and standards for the different open space typologies. The pre-application guidance notes that "...the greatest recommended provision should be noted to be within the Multi-Functional Green Space (MFGS)"
- 14.4 As noted in the OSSR, MFGS falls into the following three categories:
- Amenity greenspaces
  - Natural greenspaces
  - Parks and Gardens
- 14.5 The proposal incorporates amenity and natural greenspaces, along with provision for children and young people, i.e., a mountain bike technical skills area (MBTSA), LEAP and sheltered seating along with car and cycle parking provision. There is also potential to incorporate a medium size park (as defined by the OSSR), based on the large areas of open space provided on site.
- 14.6 The size of the open space provision is determined by the demand generated by the development. The OSSR sets out occupancy rates for different dwelling types and sizes which have been used to calculate the occupancy of the development as demonstrated in the table below:

| Bedrooms | Type  | Occupancy Rate | No.          | Occupancy    |
|----------|-------|----------------|--------------|--------------|
| 1        | House | 1.7            | 0            | 0            |
| 1        | Flat  | 1.2            | 12           | 14.4         |
| 2        | House | 1.8            | 6            | 10.8         |
| 2        | Flat  | 1.3            | 23           | 29.9         |
| 3        | House | 2.2            | 30           | 66           |
| 3        | Flat  | 1.7            | 4            | 6.8          |
| 4        | House | 2.7            | 18           | 48.6         |
| 4        | Flat  | 2.4            | 0            | 0            |
|          |       |                | <b>Total</b> | <b>176.5</b> |

Fig 26 – Development Occupancy Calculation

- 14.7 The required quantity of open space provision, based on table 8.4.4 of the OSSR is shown in the table below:

| Typology                         |                    | Quantity Standard<br>Sqm/Person | Quantity for 177<br>people (sqm) | Quantity<br>in Ha |
|----------------------------------|--------------------|---------------------------------|----------------------------------|-------------------|
| MFGS                             | Parks/Gardens      | 13.7                            | 2,425 (min 2,000)                | 0.24              |
|                                  | Amenity Greenspace | 5.8                             | 1,027 (min 500)                  | 0.10              |
|                                  | Natural Greenspace | 24.3                            | 4,301 (min 500)                  | 0.43              |
| Provision<br>for Young<br>People | Children           | 0.5                             | 89 (min 400)                     | 0.04              |
|                                  | Young People       | 0.4                             | 71                               | 0.01*             |

*\*Note minimum provisions for each type of provision.*

Fig 27 – Table showing open space quantitative provision requirement

- 14.8 All of the areas will be designed to meet the detailed requirement of the OSSR, and the following areas are provided, as noted in the Landscape Strategy by KMD:
- a) **MFGS:** Natural & Amenity Greenspace (incorporating SuDs measures and green corridors) – Circa 2.36 Ha. A medium park could be included in this area which is extensive.
  - b) **LEAP** – 440m<sup>2</sup> (plus 20m buffer)
  - c) **Mountain Bike Technical Skills Area/Trail** (MBTSA)- 0.1 Ha
- 14.9 Part of Whitelands Farm has been used to accommodate the MBTSA and MFGS (incorporating SuDs).
- 14.10 The green corridors through the site are over 5m in width and therefore qualify as natural greenspace.
- 14.11 In addition to the open space provision above, the offsite BNG meadow area is circa 2 Ha in size and provides mown footpaths for those living in the development to use for recreational walking.
- 14.12 As demonstrated above, the provision of open space meets a variety of needs and covers a substantial portion of the site. Details of this would be developed further as part of a reserved matters application but it is clear that the appropriate provision can be made within the masterplan.
- 14.13 These are illustrated in the Landscape Overlay drawing contained within the Landscape Strategy by KMD. This is included in Fig 28 below.



Fig 28: Extract from KMD Landscape Strategy  
"Landscape Overlay – Greenspace, SuDs, Play, Walking"

## 15 Landscape and Visual Impact

- 15.1 The site is within the Landscape Character Area J1. Whilst this landscape is described as semi-enclosed with a strongly rural undeveloped character, it also acknowledges the urbanising influences of the A29 with the “overall” landscape having a “moderate” sensitivity to change.
- 15.2 The pre-application advice states that (bold text is MCA emphasis):
- “A development of the scale proposed would introduce large scale housing **substantially detached** from the existing urban grain of Pulborough/Codmore Hill and **of noticeably greater scale** to any pre-existing development within the immediate vicinity of the site. The scale and situation of the proposals, therefore, would be considered **inconsistent with the existing landscape and settlement pattern.**”*
- 15.3 The southwest edge of the application site is less than 300m from the amended built-up area boundary (BUAB) of Codmore Hill (circa 270m away). This is contrary to the 600m distance suggested in the pre-application advice which is based on the older HDPF. However, whilst detached from the BUAB, neither distance is substantial.
- 15.4 The proposed development would be part of a line of development along the A29 corridor between Pulborough and Billingshurst. Many of these are of a similar or larger scale. For example, the northwest cluster of development at Codmore Hill, the substantial Brinsbury College campus, and Adversane. The proposal would therefore be in character with the existing landscape and development pattern. This is indicated on the aerial study in Fig. 29 below:

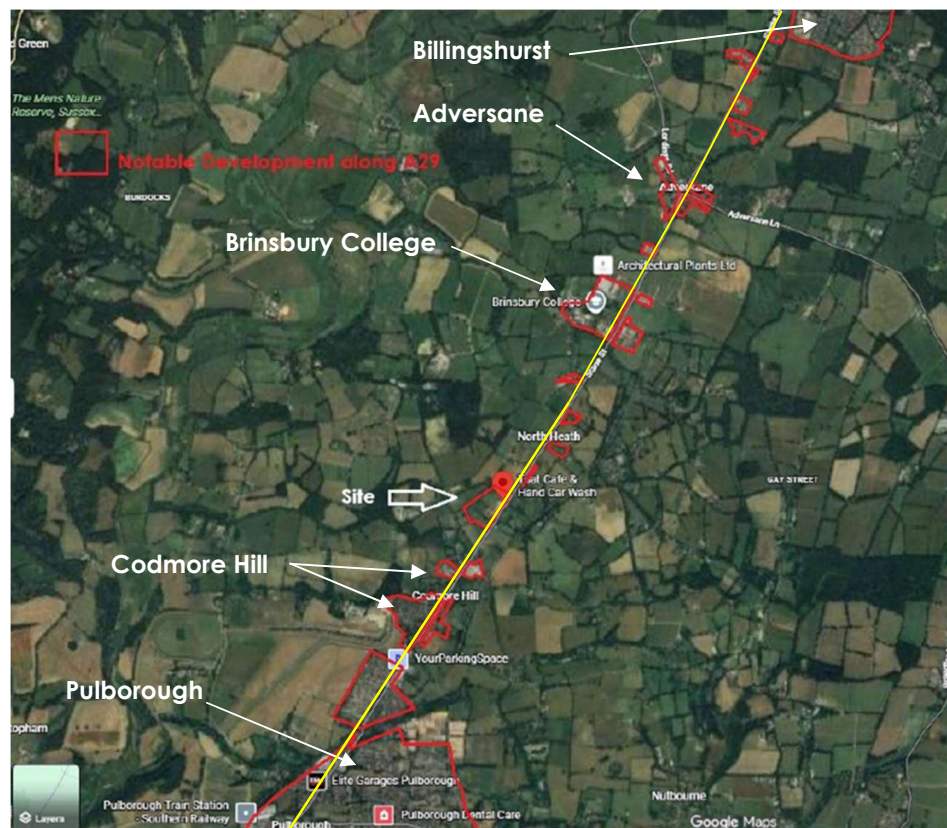


Fig 29: Aerial Study of development along the A29 between Pulborough and Billingshurst. (Development outlined in red. A29 Indicated in yellow.)

- 15.5 The proposals therefore comply with HDPF Policies 2, 12 and 26.
- 15.6 The pre-application advice adds:
- "The introduction of built form associated with the indicative proposals would result in urbanising effects detrimental to the rural qualities of land to the rear of Toat Café and to the receiving landscape"*
- 15.7 The proposed masterplan has been developed following the pre-application advice in response to the officer's comments and the LVIA by ROAVR Group. Hedgerow restoration and planting, tree planting, landscape buffers, multifunctional greenspaces and the reinforcement of existing field boundaries characterise the landscape - led development into which informal housing clusters are placed.
- 15.8 Below are illustrative aerial photomontages of the proposals which demonstrate the above in the context of the immediate existing landscape and depicting the existing and proposed green infrastructure.



Fig. 30: Illustrative Aerial photomontage of the proposal looking southwest



Fig 31: Illustrative Aerial photomontage of the proposal looking northeast.

- 15.9 The LVIA provides a detailed and robust assessment of the baseline landscape and visual conditions of the site and development impacts together with the design led avoidance and mitigation measures which have been adopted as part of the proposals. The report concludes:

*"The proposed development is located within a landscape of moderate sensitivity at the application site, where change must be handled carefully but can be successfully accommodated through landscape-led design, retention of key vegetation, and substantial structural planting. The baseline is not one of isolated or pristine countryside, but of a mixed roadside environment in which rural and urbanising influences already coexist.*

*In professional judgement, and subject to the implementation of the proposed mitigation and long-term management measures, the scheme would not give rise to unacceptable landscape or visual effects. Rather, it would introduce a more coherent, better integrated and more effectively landscaped form of development than the existing fragmented roadside condition and is therefore capable of being supported in landscape and visual terms."*

- 15.10 The Council's landscape consultants also provided comments on the pre-application proposals including:

- a) The proposals "enhance the site's green infrastructure."
- b) "To secure their retention and protection, the retained vegetation should be incorporated within the public realm."

All vegetation is now within the public realm including around the perimeter of the site where boundary treatment will separate it from the residential curtilages.

- c) "...one of the key sensitivities to change for this area is the introduction of large-scale housing..." Concerns about the scale of the development within the existing development pattern are also noted.

This is addressed above in response to the planning officer's comments.

- d) The proposal is contrary to Policy 8 of the PNP.

This point is addressed in section 6 of this statement.

## 16 Contamination

- 16.1 The north-west of the site (Whitelands Farm) has been subject to planning enforcement action in relation to unauthorised importation, storing, processing, sorting and transferring of waste materials, which was unknown to the applicant at the time. These materials have subsequently been removed to the satisfaction of Enforcement officers and the case closed.
- 16.2 A Preliminary Ground Contamination Risk Assessment Report has been carried out by Ashdown Site Investigation and included with this application.

- 16.3 The report recommends an intrusive ground investigation to allow a quantitative risk assessment of the potential contamination sources that have been identified, including those associated with the car wash, above ground tanks, agricultural units and historical waste processing. As noted in the report, the requirement for these works could be covered by appropriately worded planning conditions should the proposed development works be approved.
- 16.4 A historical brick works is identified more than 200m south-west of the site. Given the distance from the site, it is not considered to be a viable source of ground gases that could impact the site. Reference to "landfill" may only relate to the placement of surfacing material and would therefore have no risk from ground gas generation. This would be confirmed by intrusive investigation and if present, appropriate mitigation measures would be implemented.
- 16.5 Following the first issue of the above report, the applicant arranged for building debris, material stockpiles, bonfire remnants and waste at the site to be removed. It is accepted that ground investigations will still be required and any necessary remedial measures undertaken which can be secured by condition as noted above.

## 17 Conclusion

- 17.1 The site has been demonstrated to be clearly in a **sustainable location** adjacent to the defined BUAB of Codmore Hill. Access to the services of Pulborough and Codmore Hill and beyond can be accessed by sustainable modes of transport including walking, cycling and bus, with nearby bus stops re-located adjacent to the site and improvements to the existing footway.
- 17.2 A significant portion of the site is **PDL** where development is encouraged, including the Toat Café, hardstanding, Stanes Cottage, mobile homes and storage buildings.
- 17.3 The proposals have due regard to **highway safety** as detailed in the accompanying Transport Statement including consultation with WSCC who made no objections to the proposals and therefore the application should not be refused on highways grounds. The local highway network can accommodate the traffic generated by the site during without resulting in a severe residual cumulative impact.
- 17.4 Whilst the proposals do not accord with the PNP allocation, the council cannot demonstrate a 5YHLS, (currently 1.7 years), housing allocations in the PNP are not based on an up-to-date assessment of local housing need, and the allocated commercial uses are not proceedable following a robust marketing campaign. Therefore, the adverse impacts of the conflicts with the neighbourhood plan do not significantly and demonstrably outweigh the benefits, which include the provision of market and affordable housing, public open space, reinforcement of green infrastructure and screening at the site. The **"tilted balance"** therefore remains engaged.
- 17.5 There has been **early engagement** with the Local Planning Authority, Highways Authority and the local community through pre-application submissions and a Public Consultation. As demonstrated in this statement, the master plan design has been developed to reflect the feedback received. There has also been overwhelming

support from the local community as evidenced by letters of support and feedback from the Public Consultation.

- 17.6 The site falls within the **agricultural land classification subgrade 3b** and none of the site falls into the Best and Most Versatile (BMV) agricultural land category.
- 17.7 A variety of accessible **public open space** typologies are provided throughout the site including multi-functions greenspaces, LEAP, mountain bike technical skills area and walking routes providing opportunities for informal recreation for adults, young people and children.
- 17.8 The masterplan design has been landscape-led and an LVIA has been prepared which has informed the Landscape Strategy for the scheme. The LVIA demonstrates that the scheme would not give rise to unacceptable **landscape or visual effects**.
- 17.9 The site is in Flood Zone 1 and the application is supported by a Drainage Strategy including a Flood Risk Assessment. **SuDs** is carefully integrated into the landscaping and fully complies with the National Standards for Sustainable Drainage Systems (2025) and ensuring surface water runoff from the site is no greater than existing and does not increase flood risk elsewhere.
- 17.10 The Heritage Statement assesses the impact of the proposals on nearby heritage assets including Grade II listed Mill House and concludes that the scheme is **acceptable in heritage terms**.
- 17.11 There is limited existing **employment** on the site and the proposed development including café, shop and pharmacy will ensure there is no net loss of employment at the site. It has also been demonstrated through a robust marketing campaign that the allocated commercial uses for the site within the PNP are not proceedable.
- 17.12 An extensive **marketing campaign** over a 2-year period was carried out for the site, targeting the commercial uses listed in the PNP. Due to a lack of proceedable interest, it was concluded that converting the site to residential use is the only feasible and sustainable way of developing the site.
- 17.13 The existing **green infrastructure** of the site is to be reinforced and enhanced. Ecological surveys and reports by "enims" and ROAVR Group have been carried out and demonstrate the protection of protected and priority species/habitats and **BNG** exceeding the minimum requirements.
- 17.14 Very limited tree removal is proposed and applies to low grade C or U trees. The remaining **trees** on site will be retained and protected during construction and in the long term along with over 100 new trees to be planted.
- 17.15 The suitable housing mix that meets the requirements of the SHMA and **local housing need** including affordable is achieved.
- 17.16 For the reasons set out above, we commend this outline application to you for approval.

MCA Architects