
Appendix B

Pre-application submission drawings, pre-application statement and HDC advice letter from Giles Holbrook of HDC, dated 5 August 2025



**Horsham
District
Council**

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Your ref:
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Tel: 01403 215436
Date: 5th August 2025

Dear Sir/Madam,

Location: Toat Cafe Stane Street North Heath Pulborough

Details: The removal of all the existing buildings on site and their replacement with 93 housing units and the provision of a new vehicular access into the site

This pre-application enquiry concerns land west of Stane Street (A29) at a distance ~600m north of the defined built-up area boundary of Pulborough and Codmore Hill.

The pre-application site extends to ~5.25ha and comprises predominantly of undeveloped land. The section of the site closest to Stane Street associated with Toat Café constitutes previously developed land, and which includes a comparatively large expanse of hardstand. The site, additionally, contains the dwelling of Stanes Cottage accessed via Toat Café to the north.

The site at present appears to be comprised mostly of pasture in varying conditions. The site benefits from treed-hedgerows to its northern, western and southern perimeters together with an internal treed-hedgerow with runs from the south of Stanes Cottage to the western site boundary.

The site is subject to areas of surface water flood-risk ranging from areas of low-high risk. These areas are largely confined to land surrounding the existing Toat Café forming part of a surface water flow-path leading from the site to the north and also correspond to existing internal field-divisions form part of a flow-path leading to the west of the site. Some isolated areas of risk, including surrounding Stanes Cottage and within existing paddocks, are also indicated. The extent and severity of modelled risk is greater for the 2040-2060 scenarios as detailed within the March 2025 Environment Agency mapping.

The site is found opposite the Grade II Listed Building of Mill House on Stane Street, and falls within the wider 15km impact risk zone for the Mens and Ebernoe common SAC and within the Sussex North Water Resource Zone, as subject to the Natural England 'Position Statement' of September 2021 addressing impacts upon the Arun Valley SAC, SPA and Ramsar designations. The site, further, is shown as 'Grade 3' agricultural land at strategic scale and falls within the designated safeguarding area for brick-clay resources within the West Sussex Joint Minerals Local Plan. The site, otherwise, is free of any heritage, environmental, ecological or landscape designation.

The pre-application proposal is for the demolition of existing structures and the provision of 93x housing units together with associated access, open space and supporting infrastructure. Two indicative 'options' for the site have been presented alongside the proposals, which are identical except for alternative approaches to the prospective site access. Option 1 proposes the formation of a three-branch roundabout on Stane Street while Option 2 proposes the formation of a simple priority T-junction.

RELEVANT PLANNING HISTORY:

No previous relevant planning history.

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF):

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities
Policy 43 - Community Facilities, Leisure and Recreation

Horsham District Local Plan (2023-40) (Regulation 19):

Policy 1: Sustainable Development
Policy 2: Development Hierarchy
Policy 3: Settlement Expansion
Policy 6: Climate Change
Policy 7: Appropriate Energy Use
Policy 8: Sustainable Design and Construction
Policy 9: Water Neutrality
Policy 10: Flooding
Policy 11: Environmental Protection
Policy 12: Air Quality
Policy 13: The Natural Environment and Landscape Character
Policy 14: Countryside Protection
Policy 15: Settlement Coalescence
Policy 17: Green Infrastructure and Biodiversity
Policy 19: Development Quality
Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Policy 23: Infrastructure Provision

Policy 24: Sustainable Transport
Policy 25: Parking
Policy 27: Inclusive Communities, Health and Wellbeing
Policy 28: Community Facilities, Leisure and Recreation
Policy 37: Housing Provision
Policy 38: Meeting Local Housing Needs
Policy 39: Affordable Housing
Policy 40: Improving Housing Standards in the District

West Sussex Joint Minerals Local Plan (2018)

Policy M9 - Safeguarding Minerals

Draft Pulborough Neighbourhood Plan (2021)

Policy 1 – A Spatial Plan for the Parish
Policy 8 – Toat Café, Stane Street
Policy 15 - Design
Policy 16 - Cycleways

Supplementary Planning Guidance:

Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes:

Facilitating Appropriate Development
Biodiversity and Green Infrastructure

PLANNING ASSESSMENT

Principle of Development

Policy 2 of the Horsham District Planning Framework (HDPF) is the main strategic spatial policy of the existing development plan. This policy seeks to satisfy community needs by way of sustainable growth which maintains suitable access to services and local employment whilst maintaining the unique rural character of the District. Policy 2, amongst other things, seeks to focus development around the main settlement of Horsham, while allowing growth in the remainder of the District in accordance with the identified settlement hierarchy. Policy 2, further, seeks to support the sustainable development of settlements in a manner which preserves existing settlement patterns, protects the rural character of the District and landscapes and prevents the merging of settlements.

Policy 3 of the HDPF outlines the settlement hierarchy of the District and establishes that development will be permitted within defined built-up area boundaries. Pulborough/Codmore Hill is defined within the hierarchy as a 'large village/small town' characterised as a settlement possessing a good range of services and facilities with reasonable access to public transport. Such settlements are capable of supporting a good range of day-to-day needs of residents, but rely on other settlements for a full-range of employment, educational, healthcare and leisure needs.

Policy 4 of the HDPF concerns settlement expansion and provides that the growth of settlements will be supported in order to meet identified needs. Beyond defined built-up area boundaries settlement expansion will be supported where:

- 1.) A site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;
- 2.) Where the level of expansion is appropriate to the scale and function of the settlement;
- 3.) Where the development would satisfy identified local housing (or employment) need or would assist with the retention and enhancement of community facilities/services;

- 4.) Where development would not prejudice long-term strategic development and;
- 5.) Where development is contained within an existing defensible boundary and would maintain features of landscape and townscape character.

Policy 26 of the HDPF aims to protect the countryside against inappropriate development. This policy seeks to ensure that development outside of defined settlement boundaries is essential to its respective countryside location, does not result in a significant intensification of activity within the countryside (cumulatively or individually) and, in addition, relates to the needs of agriculture or forestry, minerals extraction or waste disposal, quiet recreational use or enables the sustainable development of rural areas.

The spatial approach of the existing development plan in these respects is largely consistent with that provided for by the submission Horsham District Local Plan (HDLP) as provided for by draft HDLP Policies 2, 3 and 14.

Policy 1 to the Draft Pulborough Neighbourhood Plan (PNP) operates to support the spatial approach of the development plan in seeking to support development proposals within the defined built-up area boundary of Pulborough and requiring adherence to the provisions of the development plan in respect of the manage of development within the countryside.

Policy 8 to the Draft PNP allocates part of the pre-application site affords support to a redevelopment of the site for a specific range of commercial uses (Class B2, B8, C1, E, F1 and F2) and subject to a demonstration of acceptable access, landscape, habitats and heritage related considerations.

The Council is presently unable to demonstrate a 5-year land housing supply, with the Council's latest Authority Monitoring Report acknowledging a 5-year land housing supply of 1.1 years.

In the context of the Authority's inability to demonstrate a 5-year land housing supply and delays to the emerging local plan, the Authority has published the Facilitating Appropriate Development (FAD) document to clarify the approach that the Authority will pursue in respect of spatial matters in the circumstance that existing and emerging policy is attributed greatly reduced weight. The provisions of the FAD represent a material consideration until the document is withdrawn.

In respect of proposals for the development of unallocated land adjoining a settlement boundary the FAD confirms that the Council will positively consider applications which meet all of the following criteria:

- The site adjoins the existing settlement edge as defined by the BUAB;
- The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
- The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;
- The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and
- The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced."

The provisions of the FAD, in his regard, closely align with the provisions of HDPF Policy 4, with the exception of omitting the requirement for a development site to be allocated.

The site is some distance separated (circa 600m) from the defined built-up area boundary of Pulborough. A development of the site for residential purposes would not benefit from the support afforded at Policy 8 to the Draft PNP, recognising that the policy operates in support of a defined range of commercial uses.

In the absence of a relevant allocation in either existing or emerging development plan documents a development of the site would prove in conflict with the spatial strategy of both the existing and emerging development plan in advocating development within and around the main settlements of the District and promoting a planned approach to settlement expansion. The proposals, therefore, are considered in conflict with the provisions of HDPF Policies 2, 3 and 4 in addition to draft HDLP policies 2, 3 and 14. The degree of disconnection between the existing settlement edge and site, further, prevents the proposals from benefiting from the support afforded by guidance contained within the Council's adopted FAD document.

The proposals, further, are not of a nature which could be reasonably described as an essential form of development to this countryside location or to meet any of the four additional criteria defined within HDPF Policy 26 as relevant to a countryside location. This conclusion is considered to engage conflict with Policy 1 to the Draft PNP acknowledging operation the Neighbourhood Plan spatial policy intrinsically hinges upon the wider policies of the development plan in respect of the management of development in the countryside.

Spatial Sustainability:

The application site falls within a rural context removed from the closest settlement of Pulborough with the principal route of access between the site and Pulborough provided via the A29, a well-trafficked national speed limit road benefiting from a dedicated pedestrian footway (of unknown width) to its eastern edge.

A small range of facilities and services are located within relatively close proximity to the site, including the North Heath petrol filling station and convenience store ~200m north of the site and industrial estates ~400m of the south. Main supermarkets are found within the existing settlement boundary at ~1.31km south of the site with Pulborough High Street found ~2.75km south of the site and Pulborough Station found ~3.15km distant. The closest school to the site is St Mary's C.E Primary School (~2.2km south) with the closest secondary school being the Weald, Billingshurst, (~4.85km north).

Bus stops are found a short distance north of the North Heath Service station and are indicated to be served by the No.69 and No.100 services. The former of these services is a single day service while the No.100 service is indicated to operate to a maximum frequency of 1-hour between Horsham and Burgess Hill. This service does not operate on Sundays, with services also noted to end comparatively early in either direction Monday-Saturday.

A pre-application 'Transport Statement' submitted in conjunction with this enquiry advances that the site is well-located in affording easy opportunities for walking and cycling in light of assessed distances to nearby services and facilities and with prospective occupiers afforded suitable access to public transport.

The conclusions of the Transport Statement in respect of the extent of choice which future occupiers would be afforded in accessing day-to-day services and amenities are not agreed. Only a small range of amenities are within walking distances of the site, with a wider range of services afforded by Pulborough only available within frequent cycling distances as stated within active travel guidance documents. Stated distances within guidance, however, are not fully representative of the experience of future users and it is not considered that the pre-application Transport Statement has taken sufficient account of the specific context of the site.

The A29, which remains the only convenient route connecting the site to Pulborough and Billingshurst, is subject to the national speed limit and is known to be a well-trafficked route. This route, further, features some notable undulations leading back towards Pulborough, lacks street-lighting and features only a narrow pavement featured to the opposite side of the application site. 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 age groups and those with additional needs.

Alternative routes towards Pulborough via the footpath network are available (namely via footpath nos 1983, 1986, 1987 and 1995), though, these routes are indirect, unlit and unmade. Bridlepath 2308, similarly, is available, though, similar unlit, indirect and unmade. While potentially suitable for recreational use, these routes are not considered likely to be regularly employed by future occupiers as a means of access to day-to-day services.

With regard to these circumstances, therefore, it is considered unrealistic that a good proportion of journeys towards Pulborough would be made on foot/cycle. 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.

The No.100 bus service does afford some alternative means of access to the site other than by way of the private car, though, is also infrequent, terminates early in either direction and serves a limited range of destinations.

Overall, with regard to active travel opportunities and the degree to which the site is serviced by public transport it is considered that future occupiers would not be afforded a genuine choice of travel and would prove highly dependent upon the use of the private car for the majority of day-to-day journeys. It is not considered, therefore, that the proposals would prove compliant with the provisions of HDPF Policy 40 in the sense that this policy seeks to ensure that development is served by a range of potential transport options and promotes a rebalancing away from reliance on the use of the private car and NPPF Paragraph 110 which seeks to ensure that significant development is focused on locations which are, or can be made, sustainable. These conclusions are consistent with those reached in preceding appeal determinations in broadly comparable spatial contexts on the A29, including at Land North of Tisserand Farm (HDC ref: DC/21/1571).

In the event that the applicant were minded to pursue a formal application the Council would expect to see a Transport Assessment for a development of the indicative scale in accordance with Paragraph 118 of the Framework and prepared with specific regard to Active Travel England guidance demonstrating the manner by which the development will seek to prioritise active and sustainable transport in accordance with NPPF Paragraphs 115 and 117.

Landscape and Visual Effects:

The proposals fall within Landscape Character J1 (Billingshurst and North Heath Farmlands) as categorised in the Horsham Landscape Character Assessment (LCA) (2003). The LCA describes this landscape as broadly a semi-enclosed landscape possessing a strongly rural undeveloped character. The LCA notes the prevalence of small to medium sized fields enclosed by frequent hedgerows, copses and small/medium sized woodland. The LCA, further, notes the presence of many mature field trees following hedgerows and lanes and Toat Monument as an important landmark. The LCA, further, acknowledges some urbanising influences associated with the A29, with the landscape overall assessed to possess a moderate sensitivity to change and with the key sensitivities noted to include the development of large scale housing.

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.

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. The nature and type of effects, further, would represent a significant departure from those anticipated to arise from a partial development of the site for commercial purposes in-line with the draft PNP allocation. The loss of small and medium sized fields together with the part loss of boundary vegetation, treed-hedgerows and any individual trees, further, would both prove directly harmful to key components of the LCA and to an appreciation of its character at landscape scale.

No Landscape and Visual Impact Assessment (LVIA) appears to have yet been conducted in relation to the proposals, as such, a detailed assessment as to the precise scale of landscape and visual harm cannot yet be reached at the time. On the basis of the indicative layout and scale the proposals, however, officers do consider that the proposals are likely to result in detrimental visual/landscape effects which are unlikely to be mitigated to an acceptable degree by the retention of visual screening to the site perimeter or by new landscaping.

The apparent absence of a clear assessment of the landscape and visual sensitivities of the site, further, calls into question the degree to which the indicative proposals could be said to have been led by their respective landscape context. It is substantially unclear whether the indicative quantity, layout and scale of development has been directly informed by the recommendations of an LVIA and has sought to avoid and/or lessen any effects upon assessed landscape and visual receptors. This is regarded as a critical component of good design.

Advice of the Council's Landscape Consultants:-

"The proposal is for the removal of all of the existing buildings on site and the erection of a total of 93 dwellings including new vehicular access into the site. The proposals also include the provision of a Local Equipped Area for Play (LEAP).

The submitted proposed site plans 1726/SP-01 & 1726/SP-02 are broadly the same in terms of development layout and landscape strategy. The only notable difference between both options relates to the design of the site access in highway terms. The indicative proposals include the retention of the majority of the existing vegetation alongside new planting to fill gaps along the site boundaries and to reinforce visual screening and enhanced the site's green infrastructure (GI) network.

As per Policy 26 - Strategic Policy: Countryside Protection, proposals must be of a scale appropriate to its countryside character and location. Additionally, Policy 2: Strategic Development, says "5. 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" and "12. Retain and enhance natural environmental resources, including landscapes and landscape character..." Based on the submitted proposals we have the following comments:

- The proposals include the retention of the majority of the existing vegetation, however much of this vegetation is shown within the private rear gardens of the proposed dwellings. This approach is not considered appropriate, as it will compromise the long-term retention of these important landscape features. To secure their retention and protection, the retained vegetation should be incorporated within the public realm.*
- As per the Horsham LCA, one of the key sensitivities to change for this area is the introduction of large-scale housing. The proposed development is for a total of 93 dwellings as it is considered to be a large scale development. Residential development within the site's surrounding landscape consists of scattered small clusters. The nature of the proposed development is a lot larger and does not respond or reflect the existing settlement pattern, resulting in a development that is out of character with its context.*
- The draft Pulborough Neighbourhood Plan identifies the site under Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough (PPNP27) for redevelopment. The*

policy outlines acceptable uses including commercial activities (Classes B2, B8, C1, E, F1, F2), motor sales showrooms, and leisure parkland. However, the current proposal is for residential development. This represents a significant departure from the uses considered appropriate within the draft plan and does not align with the intended vision for the site, particularly given its surrounding context and landscape character.

Because of the above, we considered that the proposals do not respect the sensitivity of the landscape character area in relation to appropriate development. The existing landscape features within the site have not been sensitively integrated into the development proposals and their long-term preservation is at risk. Additionally, the proposed nature, layout and scale of development does not reflect or respond the existing built pattern or the character of the surrounding area.

While the site benefits from a degree of visual screening, we considered that the indicative proposals are not appropriate in landscape character terms and would result in a detrimental impact on the landscape character that cannot be mitigated to an acceptable level.”

Design

In respect of the treatment of existing vegetation and indicative new planting it is considered that the indicative layout is unsuccessful. 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 sections 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.

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.

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.

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.

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. 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.

It is, additionally, 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. 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.

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.

Affordable Housing and Housing Mix

The submitted pre-application statement is noted to commit to the provision of affordable housing at 35% of total housing, as such, aligns with HDPF Policy 16. The Council would expect affordable housing to be delivered on a 70-30 ratio in favour of affordable rent over shared ownership and other affordable housing products.

The indicative plans submitted in support of the pre-application proposal do indicate as to the expected housing mix, though, do not distinguish between the intended provision between market, affordable housing and shared ownership units. The indicative housing mix is shown below:-

	No. of units	Percentage
1-bed	21	22.5%
2-bed	32	34%
3-bed	30	32.3%
4(+)-bed	10	10.7%
Total	93	

Policy 16 to the HDPF provides that development should provide a mix of housing sizes, types and tenures to meet the needs of the District as evidenced within the latest Strategic Housing Market Assessment (SHMA).

The strategic conclusions of the Council's latest SHMA recommend the following percentage provision across various categories of size and tenure:-

	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%

Consistent with HDPF Policy 16, 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 housing. Any divergence from the provisions of the SHMA in respect of the provision of shared ownership and market unit would need to be substantiated at applications stage.

As of March 2025, 160x households are recorded on the housing register waiting list for Pulborough. This is broken down as 44x households awaiting a 1-bed unit, 42x households awaiting a 2-bed unit, 54x households awaiting a 3-bed unit and 20x households awaiting a 4-bed unit. The greatest local category of need for affordable rental units, therefore, is within the 3-bed unit category. Consistent with trends across the District, it is likely that demand for larger affordable rental units (3 and 4-bed) is substantially more entrenched than demand for smaller units.

In the event that a formal application were to be made the Council would attribute positive weight to an affordable rental mix which was best responsive to local need and which specifically sought to address the significant unfilled demand for 3-bed affordable rental units within Pulborough.

Amenity:

The indicative layout is not considered to give rise to any obvious concerns in terms of likely effects upon neighbouring occupiers/users of land.

The indicative layout, further, largely avoids any unacceptable degree of mutual overlooking, though, attention would need to be given to plots with garden spaces positioned to the adjacent side to ensure that clear-glazed windows are introduced in positions where neighbouring garden spaces would be subject to significant degrees of overlooking.

Heritage:

The pre-application proposals have the potential to impact upon the setting of the Grade II Listed Mill House found opposite to the site on Stane Street. The heritage effects of the prospective development should be assessed within a formal heritage statement provided in accompaniment to a formal submission to enable detailed consideration by the Council's Design and Conservation Officer.

Access:

It is acknowledged that two alternative options have been presented in respect of site access, with option-1 detailing the provision of a three-branch roundabout to service the site off Stane Street.

The Local Highways Authority (LHA) will not respond to pre-application requests registered with the Council and operate their own pre-application service. In the absence of expert LHA comments it is not considered that the Council is in a position to offer an opinion as to the implications of the prospective development upon highway safety or operation, or as to any preference between the alternative site-access options. The applicant may wish to consider engaging with the LHA directly through their own pre-application process.

It is considered likely that a development of this scale would necessitate the completion of an independent Road Safety Audit (RSA). This process should be completed, with any relevant recommendations incorporated to the proposals, in advance of the submission of a formal application.

Ecology:

The prospective development should be supported by a site-specific ecological assessment and seek to incorporate any relevant mitigations for individual protected and/or priority species. The applicant, further, is advised of the necessity for any future submission to address statutory requirements for biodiversity net-gain. The Council's guidance, and expectations, for biodiversity net-gain are explained within published guidance¹.

It is acknowledged that a provisional Water Neutrality Statement (WNS) has been provided in support of the development proposals. The submitted WNS advances that on-site measures can be employed to reduce water-consumption to a standard of 56.47 litres/person/day, though, that a need to offset at least 8,257.62 litres/day would remain as the expected net-increase above the purported baseline position of 2,503.57 litres/day. The WNS explains that the applicant intends to secure an appropriate number of offsetting credits (by way of an undefined scheme) in order to secure this relevant offset.

¹ <https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain#support>

In principle the strategy advocated within the WNS is acceptable. At applications stage, however, the applicant should seek to provide copies of the water-bills summarised at Appendix E in order to verify the baseline position. The applicant, further, should seek to clarify whether the proposals are/are not reliant upon a rainwater harvesting system and which specific installations are proposed to be serviced by any such system. Sufficient details, further, should be made available to allow a relevant rainwater yield calculation to be performed (pursuant to BS EN 16941-1:2018).

It is, further, essential that any WNS provided in accompaniment to any formal submission contains a detailed offsetting strategy, including the credits scheme which any proposal seeks to rely upon, such that the relevant scheme can be considered within an assessment completed pursuant to Regulation 63 of the Conservation of Habitats and Species Regulations (2017).

The Council would not support a scheme which did not seek to detail an offsetting strategy at the time of submission. The provisional WNS strategy, however, is deemed capable of support in principle subject to the receipt and consideration of relevant details.

Drainage and Flood Risk:

Policy 38 to the HDPF provides that development should follow a sequential approach to flood-risk, giving priority to sites and layouts which minimise vulnerability to flood risk and the risk of increasing flooding elsewhere.

NPPF Paragraph 181 provides that development should only be allowed in areas at risk of flooding where it can be demonstrated that development is located in the areas of lowest flood-risk, that development is appropriately flood-resistant and resilient, that sustainable urban drainage systems are incorporated and any residual risk can be safely managed. Paragraphs 175 and 177 of the Framework, further, confirm that a sequential test should be performed in respect of the development of land at risk of flooding now or in the future, from any source, except in situations where a site-specific flood-risk assessment demonstrates that no built-development (including access and escape routes) is subject to flood-risk in order to establish whether it is possible for development to be located in areas at lower risk of flooding.

Parts of the pre-application site, inclusive of those targeted for housing development, are modelled as at risk of surface water flooding. These circumstances engage the need to consider both the sequential and exception flood-risk tests in conjunction with a future development.

Absent of a Sequential Test which considers the reasonable availability of alternative land at lesser risk of flooding and which demonstrates that the development can be made safe for its lifetime the proposals would be considered in conflict with the provisions of HDPF Policy 38 in addition to NPPF Paragraph 177 and 178. Were the applicant minded to undertake a sequential test the Authority would be willing to confirm the expected scope of any search for alternative sites.

It is, further, noted that the indicative layout does not include any provision for the delivery of SuDS infrastructure, inclusive of any attenuation basin features. The need for this infrastructure must be assessed and established in advance of submission, especially given the nature of existing flood-risk on site. It is the Council's expectation that any such development be included within the defined extent of the application site.

Trees:

Policy 33 to the HDPF presumes, *inter alia*, in favour of the retention of existing natural features, including trees. This reflects the provisions of NPPF Paragraph 136 and 187(b) which respectively seek to ensure that trees are retained wherever possible and sets an expectation that development recognises the intrinsic character and beauty of the countryside and the ecosystem services which it fulfils, including in relation to trees and woodland.

The site presently contains a good number of trees which are concentrated primarily within treed-hedgerows present to field boundaries at the site perimeter and internally within the site (including to the edge of the domestic curtilage of Stanes Cottage). A number of trees appear to be mature and in good condition. Individually and collectively the presence of trees within and to the perimeter of the site positively contributes to the key characteristics of this landscape character and to its rural character more generally.

No arboricultural survey or detail has been provided in support of the proposals. The precise positions and condition of existing trees are unknown, together with the degree to which these constrain development within the site.

The indicative layout plans are considered to suggest that the proposals would involve the removal of some existing trees together with development within the likely root-protection area (RPA) of retained trees. As noted earlier within this report a number of retained trees are shown to be retained within the private garden spaces of prospective dwellings, an arrangement which could compromise their long-term retention.

Given the predominantly undeveloped nature of the site BS 5837:2012 is of material applicability, which sets an expectation that no part of the proposed development such as buildings, hardstanding, or services, should encroach into the RPAs of any trees to be retained at the site or any off-site trees where their RPAs extend into the site.

Harm to, or the loss of, trees amounts to a degree of conflict with HDPF Policy 33 and NPPF Paragraph 136. The precise degree of conflict is contingent upon the expected degree of harm/loss and the condition/maturity of relevant trees.

Should an application be forthcoming the application should be supported by an Arboricultural Impact Assessment (AIA), which should include a detailed tree survey completed in accordance with BS5837:2012 guidance, identifying species, condition, dimensions, and Root Protection Areas (RPAs). A Tree Constraints Plan (TCP), a Tree Protection Plan (TPP), and an Arboricultural Method Statement (AMS) detailing protective measures during construction.

The proposals, further, should be designed to avoid the loss of existing trees and avoid/minimise harm to retained trees as far as possible.

Open Space:

It is noted that the indicative proposals show a single obvious area of public open-space within which a large locally equipped area of play (LEAP) feature is incorporated. The submitted pre-application statement is noted to advance that this feature is sized to exceed the needs of the prospective development and that such provision would meet wider need in the vicinity of the site.

The applicant, however, should be mindful that child and youth play provision (as primarily catered by a LEAP) represent only one typology of public open-space. As characterised within the Council's Open Space, Sport and Recreation review (OSSR) (2021) a variety of open-space needs exist within the District and which differ between locations. As reflected within HDPF Policy 32 development should seek to deliver high quality open spaces which best reflect identified needs of a community. These needs are best summarised at table 8.4.4 to the OSSR, with relevant quality and provision standards stipulated at Part 8 of the OSSR.

Any development should be designed with these standards in mind. In the absence of a detailed land-budget detailing the intended provision of various open-space it is unclear whether the proposals have or are capable of meeting the respective open-space needs of the proposed development. In line with the recommendations of the OSSR, the greatest recommended provision should be noted to be within the Multi-Functional Green Space (MFGS), Parks and Garden and

Natural/Semi-Natural Greenspace typologies. These do not appear to be obviously catered for by the indicative layout. While the provision of a LEAP feature in excess of the needs of the development is capable of attracting beneficial weight, this may not be considered the case if the scale of overprovision is at the detriment of other forms of necessary recreational open space. The degree to which a LEAP feature could be argued to convey wider benefit to existing communities, further, is likely tempered by the remote nature of the site in this instance and with regard to accessibility standards discussed within the OSSR.

Were the applicant minded to progress a formal application it is recommended that the guidance provided at Chapter 11 to the OSSR is reviewed with the proposals designed to incorporate the anticipated open space needs of a prospective development

Other Matters:

Agricultural Land:

Existing Commercial Facilities:

Policy 9 to the HDPF concerns employment development. In respect of the redevelopment of employment sites and premises outside of designated Key Employment Areas, HDPF Policy 9 provides that it must be demonstrated that the site/premises is no longer needed and/or viable for employment use.

The proposals would result in the loss of Toat Café and adjacent car-wash business. At the time of the officer site visit both businesses were in active operation, with no evidence in the pre-application submission to indicate that these businesses are no longer able to operate on a viable basis. The loss of these facilities, therefore, would amount to conflict with HDPF Policy 9 in the event that the site were developed for non-commercial purposes.

Agricultural Land:

The applicant should be mindful of the provisions of the Framework at Paragraph 187(b) and the strategic classification of the site (where this is in agricultural use) as Grade 3 agricultural land. There is the potential, therefore, that the site represents 'best and most versatile' agricultural land with regard to the definition contained at Annex 2 to the Framework and which includes grade 3a agricultural land.

The applicant should seek to establish the agricultural grading of land in advance of any formal submission by way of expert opinion in order to inform consideration in relation to Paragraph 187(b) of the Framework.

Mineral Safeguarding

Policy M9 to the West Sussex Joint Minerals and Waste Local Plan (JMWLP) seeks to protect brick-clay, together with other mineral types, from sterilisation. Policy M9 provides that development for non-minerals development within Minerals Safeguarding Area will not be permitted unless mineral sterilisation would not occur, or that it is appropriate and practicable to extract the mineral prior to development taking place, or there is an overriding need for development which outweighs the safeguarding of the mineral and that it has been demonstrated that prior extraction is not practicable or environmentally feasible.

In order to inform performance against Policy M9 to the JMWLP, in the event that a formal application were forthcoming, the Council would expect to see a Mineral Resource Assessment addressing the requirements of Policy M9 and seeking to clarify/confirm whether prior extraction would prove practicable or otherwise advancing a justification for the proposals in relation to the likely scale of lost mineral resources.

Conclusions:

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. 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.

The Council's housing land supply position, further, engages the 'tilted balance' defined at Paragraph 11(d) to the Framework.

The proposals, however, would be considered in conflict with Policy 1 to the Draft PNP, with the formal adoption of the Draft NP due to be considered by way of public referendum in September 2025. There is a strong likelihood, therefore, that a future determination will be made at a time when the PNP has been adopted and which attracts full weight. 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.

It is, further, considered that the site does not represent a sustainable location for housing development in light of the expected degree of reliance on the use of the private car reflecting the limited genuine choice of sustainable travel modes available in this location in conflict with the provisions of Paragraph 110 to the Framework. This is recognised within the footnote to Paragraph 11(d)(ii) as a key policy to which a decision maker must pay particular regard within the exercise of the tilted balance.

Other key considerations likely concern the exercise (and conclusion of) the sequential and exception flood-risk tests in relation to surface water flooding which could engage Paragraph 11(d)(i) if failed and the degree of landscape and ecological harm which could arise from a development of the site.

The proposals would involve the beneficial re-use of previously developed land (at least in part) and would contribute to the delivery of housing and affordable housing within the District. These factors attract substantial weight in favour of a grant of planning permission. It is, further, possible that the provision of public open space of an appropriate quality and amount could attract limited weight in favour of a grant of planning permission.

Overall and collectively, acknowledging the absence of necessary information to reach a conclusion in respect of all relevant material considerations at this stage, officers are of the view that the adverse impacts of the proposals are likely to significantly and demonstrably outweigh the respective benefits of the development proposals. It is considered unlikely, therefore, that the proposals would benefit from the Council's support in the event that a formal application were to be made.

Procedural Advice:

In the event that a planning application is submitted the applicant is advised that this would be subject to Horsham District Council's local validation list so as to enable the planning authority to come to an informed decision.

Further advice on what information should be provided in support of an application can be found on our website: <https://www.horsham.gov.uk/planning/planning-applications/local-and-national-requirements>.

The above comments are given as the opinion of the Case Officer in response to the information provided and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/25/0141 in your submission.

Yours faithfully

Giles Holbrook
Planning Officer

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Horsham District Council implemented a Community Infrastructure Levy (CIL) Charging Schedule on 1st October 2017.

The Community Infrastructure Levy is a charge placed on new development. The funds raised will help to pay for a wide range of infrastructure to support development across Horsham District.

Most new development which creates net additional floorspace of 100m² or more, or creates a new dwelling, (including permitted development), is potentially liable for the levy.

How does it affect you?

Applications for CIL liable development which are determined on or after 1st October 2017 are required to pay the Community Infrastructure Levy (unless the development qualifies for relief or exemption).

Further information and the rates charged by Horsham District Council are set out in the CIL Charging Schedule which can be viewed online at www.horsham.gov.uk/planning/apply/cil

General Consent e.g. Permitted Development

Developments which are permitted by way of a general consent (such as permitted development) may still be liable to pay the Community Infrastructure Levy if they meet the above criteria.

In these circumstances, you must submit a Notice of Chargeable Development (CIL form 5), notify us of the person who will assume liability to pay the CIL and make any applications for relief or exemption, before the development is commenced.



Pre-application submission for
for
a residential development at
Toat Café, Stanes Cottage and Stanes Farm
Pulborough
West Sussex
RH20 1DN

June 2025

Our Ref: 1726



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1 Introduction

- 1.1 This statement supports a request for pre-application advice relating to a proposed residential development at Toat Café, Stanes Cottage and Stanes Farm, Pulborough, Sussex, RH20 1DN.
- 1.2 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.
- 1.3 Immediately to the north of the site is a shop and petrol station (185m) with the site being connected by a level pavement to both Codmore Hill as well as the petrol station and shop.
- 1.4 This pre-application submission is supported by the following consultant reports:-
 - a) A pre-application Transport Assessment by Bellamy Roberts, dated 13 June 2025. This confirms that there are genuine opportunities for residents and visitors to travel to and from site using sustainable modes of transport and that the local highway network can accommodate the traffic generated by the site without resulting in a severe residual cumulative impact.
 - b) A Preliminary Ecological Appraisal by "enims" dated June 2025. This report highlights further surveys that would need to be undertaken to support a planning application and confirms that the principle of a residential development in the form of this pre-application submission should be acceptable, subject to the inclusion of enhancement measures and further surveys to provide appropriate mitigation.
 - c) Biodiversity Net Gain has been considered and the report notes that a net gain of 10% will be required for the development. This includes substantial additional tree and hedge planting within the site and the use of Whitelands Farm (which borders the site to the north and is owned by the applicant) for any required offset.
 - d) A Water Neutrality Statement produced by Motion dated 13 June 2025. This sets out the usage strategy for the development and confirms that once complete the development will be water neutral which will satisfy the requirements of Natural England.
 - e) A Rain Water Harvesting Management and Maintenance Plan by Motion dated 12 June 2025. This plan sets out the principles of long term management and maintenance of the rainwater harvesting systems for the proposed development.

2 Assessment of the site

2.1 The site is split into three distinct character areas.

2.2 Character Area 1 – The Toat Café

2.2.1 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.

2.2.2 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.

2.3 Character Area 2 – Stanes Cottage and Stanes Farm

2.3.1 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 looks into 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.

2.4 Character Area 3 – Area of Pasture

2.4.1 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 which 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.

- 2.5 An aerial photograph is shown below depicting the three distinct character areas of the site. Also shown is Whitelands Farm which is owned by the applicant and can be used for off site BNG offset.



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

- 2.6 As shown in the photograph above, Whitelands Farm is located to the north of the site. 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.
- 2.7 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.
- 2.8 Shown below is an extract taken from the Horsham Interactive Map depicting the whole site and the immediate surroundings. Each of the Character Areas noted above are also labelled as well as the existing buildings on the site.

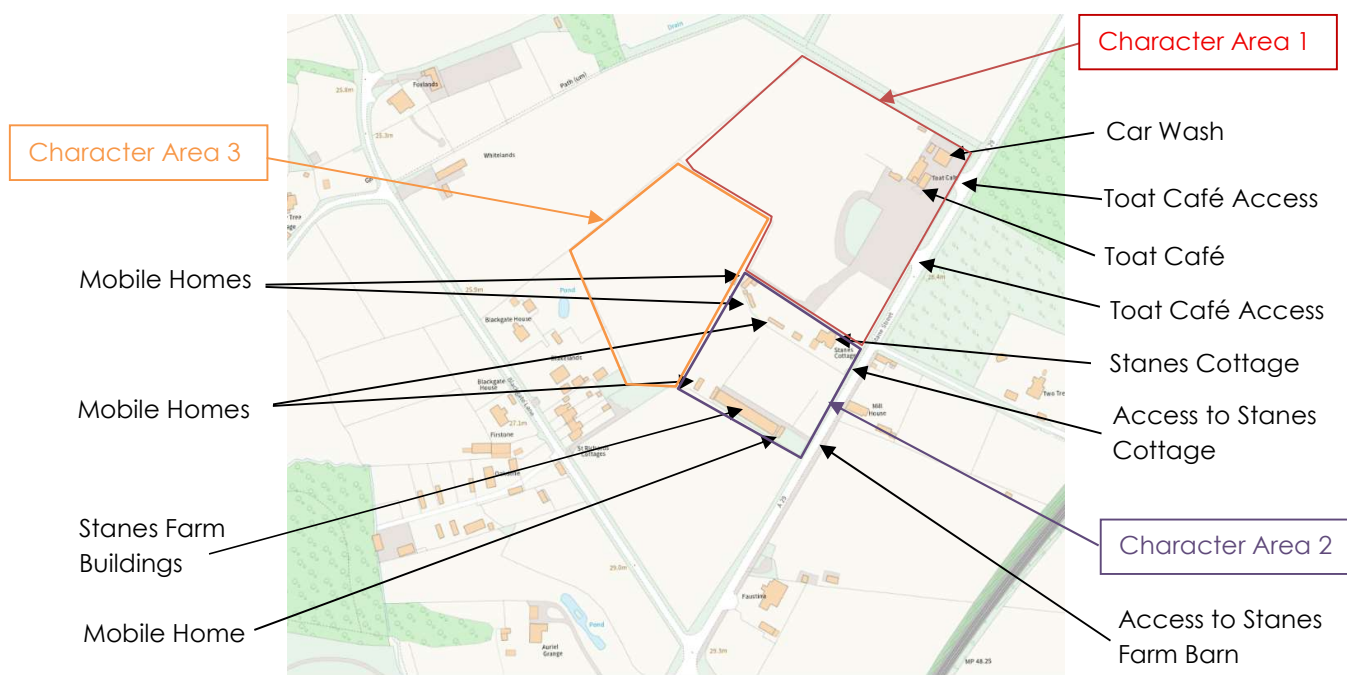


Fig. 2 – extract of Horsham Interactive Map

3 Development Proposals

3.1 There are two, largely similar, development proposals for consideration:

3.1.1 Proposal 1 - The removal of all of the existing buildings on site and their replacement with 93 housing units and the provision of a new vehicular access into the site comprising a roundabout.

3.1.2 Proposal 2 - The removal of all the existing buildings on site and their replacement with 93 housing units with a new vehicular access into the site in the form of a T-junction in the approximate location of the existing, larger access into the Toat Café site.

3.2 The housing scheme will comprise a mix of 1, 2, 3 and 4 bedroom units which is largely reflective of the local Strategic Housing Market Assessment and incorporates 35% affordable housing. The development proposal benefits from an area of Local Equipped Area for Play (LEAP). This is located in the heart of the site and is accessible by footpaths within the development. In addition, it includes an area of parking to enable the LEAP to be used by neighbouring families in the area. The scheme incorporates significant amounts of additional tree and shrub planting within the site and creates green corridors through the provision of hedgerows. The substantial tree planting around the boundaries of the site as well as the perimeter of each of the character areas has also been retained.

- 3.3 Shown below is an extract of drawing no. 1726/SP-01, proposed site plan option 1. This depicts the development proposal for the 93 dwellings utilising a roundabout to access the site. This is discussed in detail in the accompanying Transport Assessment.



Fig. 3 – Extract of drawing no. 1726/SP-01, proposed site plan, option 1

- 3.4 Shown below is an extract of drawing no. 1726/SP-02, proposed plan. This varies from fig. 3 above only by the means of site access which incorporates a T-junction. All other aspects of the design remain the same.



Fig. 4 – Extract of drawing no. 1726/SP-02, proposed site plan, option 2

- 3.5 The schemes comprise a mix of dwellings which vary from a range of one and two bedroom flats (28 no.), through to 1, 2, 3 and 4 bedroom houses. The housing mix will be spread through the development with 35% of the dwellings being affordable and 65% of them being market housing. A full schedule of accommodation is depicted on each of the relevant drawings noted above, which form part of the pre-application submission.
- 3.6 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. This is evidenced by the aerial photograph in fig. 1 and incorporates the Toat Café and the Car Wash. It is proposed to incorporate substantial additional tree/shrub planting along the eastern boundary which is depicted in light green on the drawings. In addition and also depicted in light green colour are substantial numbers of new trees, shrubs, and hedge rows formed from indigenous species within the site and also reinforcing the site boundaries. The retained trees are shown in dark green (which is almost all of them, with only three being proposed to be removed) will help promote the 10% Biodiversity Net Gain, however, due to the development having a greater hard surface footprint than the existing site, some offsite provision will be required. As set out above, the applicant owns Whitelands Farm which is located directly to the north of the site and it is proposed that additional habitats including tree and shrub planting, etc. will be provided in this area.
- 3.7 The development incorporates a substantial area of LEAP which includes children's play equipment and a skate park. In terms of size, this is substantially larger than the normal minimum requirement and has the benefit of some on-site parking for use by families in neighbouring dwellings. In addition, there is 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.
- 3.8 It is proposed that the houses and apartment buildings will be designed in a Sussex Vernacular style and they will have a maximum of two storeys to reduce their impact on the surrounding countryside. This impact is also reduced by the substantial tree planting in the site and around its boundaries.
- 3.9 The Vernacular style takes design leaders from the existing historic houses within the area. Therefore, the palette of materials which form the exterior of the units will comprise a mix of clay tile roofing, tile hanging and brick elevations.

4 Relevant planning history

- 4.1 There is little relevant planning history for the site with the exception of two procedures:
- 4.2 A "Call for Sites" submission in 2024 was part of the development of the Horsham District Council Local Plan.
- 4.2.1 This submission was for a larger site (including both the area concerned by this pre-application submission and the land at Whitelands Farm), prior to the introduction of the revised National Planning Policy Framework (NPPF) in December 2024.

- 4.2.2 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”*.
- 4.3 Part of the application site is incorporated within the draft Pulborough Neighbourhood Plan. This has been the subject of successful Examination but cannot proceed to referendum because of the legal requirements in relation to water neutrality and habitat regulations.
- 4.3.1 An extract of the NHP allocation plan depicting the portion of the overall site which is in the NHP is shown below:-



Fig. 5 – extract from NHP allocation plan

- 4.3.2 This draft allocation would allow 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.

5 Planning Constraints

- 5.1 The site is located in Countryside outside the built-up area of Pulborough.
- 5.2 The site is located in Flood Zone 1.

6 Local Plan Policies

- 6.1 Below are relevant extracts from the Horsham District Planning Framework 2015.

6.2 Chapter 4: Policies for Growth and Change

- 6.2.1 *"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"*
- 6.2.2 *"Adding large new housing areas on to existing small settlements may affect the character and community balance"*
- 6.2.3 *"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."*

6.3 Policy 1 Strategic Policy: Sustainable Development

- 6.3.1 *"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."*

6.4 **Policy 2: Strategic Development**

6.4.1 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

6.4.2 Other relevant elements of this policy include:

"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"

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

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

"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."

"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"

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

6.5 **Development Hierarchy and Settlement Expansion - Policy 3 and Policy 4**

6.5.1 *"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."*

6.5.2 *"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."*

6.6 **Policy 3 - Strategic Policy: Development Hierarchy**

6.6.1 **Pulborough** is in the category "**Small Towns and Larger Villages**" as is **Codmore Hill** which the pre-application site is close to.

- 6.6.2 *"These are settlements with a good range of services and facilities, strong community networks and local employment provision, 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".*

6.7 **Policy 4 - Strategic Policy: Settlement Expansion**

- 6.7.1 *"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.*
2. *The level of expansion is appropriate to the scale and function of the settlement type.*
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.*
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; and*
5. *The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced."*

6.8 **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..."*

6.9 **Policy 26 - Strategic Policy: Countryside Protection**

Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal

must be essential to its countryside location, and in addition 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.

In addition, 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."

6.10 **Policy 27 - Strategic Policy: Settlement Coalescence**

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

6.11 **Water Neutrality**

- 6.11.1 HDC have set out information and outlined their position with regards to Water Neutrality on their website, extracts of which are noted below:

- 6.11.2 "All development proposals that consume mains water are potentially impacted by the Natural England Position Statement."
- 6.11.3 "On 14 September 2021, the Council received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Resource Zone is not having an impact on the Arun Valley sites. It advises that development within this zone must not add to this impact."
- 6.11.4 "One way of preventing any further negative impact is to ensure that all new development which takes place is water neutral."
- 6.11.5 "Water neutrality is defined as development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels."
- 6.11.6 "How is the Local Plan being prepared to ensure that its proposed level of growth will be water neutral?"
- 6.11.7 "Two approaches are proposed to be included in the Local Plan to ensure that its identified growth is water neutral:

Firstly, all new development will need to be highly water efficient. This can be achieved by designing in water efficiency measures such as low flush toilets, rainwater harvesting and greywater recycling in new development.

However, all new development will still require some additional water. This additional water demand will need to be offset by reducing the demand for water in existing development. This might include fixing leaks or retrofitting existing buildings with more water efficient technology. The affected authorities are looking to introduce an offsetting scheme which planned development could utilise to achieve water neutrality based on the principles outlined in the 'Part C' Study."

7 National Planning Policy Framework

7.1 Paragraph 11

- 7.1.1 "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."

8 Review of Local and National Policies

- 8.1 The Council cannot demonstrate a 5-year housing land supply (5YHLS), with the latest position having been published on 30 April 2025 in the 2023/24 Authority Monitoring Report. This identified a 5YHLS of just 1 year. 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.
- 8.2 In view of the 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.
- 8.3 Paragraph 11 commences with *"plans and decisions should apply a presumption in favour of sustainable development"*. The site is clearly sustainable and the pre-application submission is supported by a detailed Transport Assessment which concludes that the application site is sustainable. This assessment is further reviewed in the "Transport" section 9.0 of this statement.
- 8.4 Paragraph 11(d) (i) is not engaged in situations where water neutrality cannot be demonstrated and "the tilted balance" does not apply. In this instance however, water neutrality can be demonstrated. This is supported by a technical note produced by Motion which is reviewed in Section 11 of this statement. The technical note confirms that the proposal will be water neutral once complete and therefore, will satisfy Natural England's requirements. As a consequence, the "tilted balance" does apply.
- 8.5 Whilst the Local Plan policies are out of date, these have still been used as a "road map" to inform the design of the application scheme. A number (but not all) of these are reviewed below.
- 8.6 Chapter 4: Policies for Growth and Change
- 8.6.1 *"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"*
- 8.6.2 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 6 residential caravans.
- 8.6.3 *"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."*
- 8.6.4 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).

8.7 Policy 2 – Strategic Development

8.7.1 *“Manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape.”*

8.7.2 The application site is only 535m from Codmore Hill which merges with Pulborough. As the Transport Assessment notes, it is only a short walk along level pavements to the application site and there are bus stops within 50 and 100m of the site respectively.

8.7.3 *“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.”*

8.7.4 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 pre-application submission and is further reviewed in Section 10 of this statement. This reviews the habitats within the site and notes that the proposed development should be able to proceed subject to enhancements, mitigation and further surveys.

8.8 Development Hierarchy and Settlement Expansion - Policy 3 and Policy 4

8.8.1 *“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.”*

8.8.2 *“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.”*

8.8.3 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.

8.8.4 Whilst it is proposed to provide all new housing through utilising brownfield sites within Built-Up Area boundaries or for expanding at the edge of settlements or connected to them, this policy is clearly not working and is inadequate given the inability to provide a 5YHLS.

8.9 Policy 16 – Strategic Policy: Meeting Local Housing Needs

8.9.1 “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....

- 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.*

The proposed housing mix is broadly 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.

8.10 Policy 27 – Strategic Policy: Settlement Coalescence

8.10.1 “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 new tree and shrub planting of indigenous species. The site does not reduce the ‘break’ between settlements by causing them to coalesce. 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 6 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."*

The accompanying Preliminary Ecological Appraisal is reviewed in more detail in Section 10 of this statement, lists a range of ecological enhancements which will be provided by the scheme and will also include substantial additional tree and hedge planning. BNG of 10% will be provided by the development, some of it on site with the remainder being provided on adjoining land, Whitelands Farm to the east of the pre-application site.

9 Transport Assessment

- 9.1 A Transport Assessment has been provided by Bellamy Roberts. This clearly demonstrates that the pre-application proposals are acceptable in highways terms. The development has been assessed against the four key tests within the NPPF and local transport policies and demonstrates that:

- a) Appropriate opportunities to promote sustainable transport modes has been considered.
- b) Safe and suitable access to the site can be achieved for all users.
- c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.
- d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

9.2 Sustainability

- 9.2.1 The report highlights that the Design Manual for Roads and Bridges (DMRB) TA91/05 'Provision for Non-Motorised Users', states in paragraph 2.3 that *"walking is used to access a wide variety of destinations including educational facilities, shops, and places of work, normally within a range of up to two miles. Walking and rambling can also be undertaken as a leisure activity, often over longer distances"*.
- 9.2.2 As noted in Clause 3.24 of the Transport Assessment recent research undertaken by WYG in 2017, assessed how far people actually walk to common destinations. The research confirmed that the 85th percentile distance of 2.1km should be used as an acceptable walking distance for all employment uses. It also found that generally Local Authorities and consultants alike use the 2km distance for walking and 8km for cycling.
- 9.2.3 There is a grocery and convenience store and petrol station 185m to the north of the site which is accessible by a level pavement.

- 9.2.4 There is a restaurant in Codmore Hill which is 650m away from the site. This is also accessible by a level pavement.
- 9.2.5 There is a supermarket at Codmore Hill within 1.2km of the site which is also accessible by a level pavement.
- 9.2.6 There are two bus stops in close proximity to the site, one being 50m away and the other 100m away, both of which are accessible by a level pavement.
- 9.2.7 There are a number of employment uses all within 2km of the site.
- 9.3 **Cycling**
- 9.3.1 The WYG also assessed that the 85th percentile cycling distances which people are happy to achieve is 9.15km. Therefore, all of the services of Codmore Hill, Pulborough and Billingshurst 4.1km to the north of the site are all accessible by cycle.
- 9.4 **Summary**
- 9.4.1 The report summarises that the proposed development site is in a sustainable location in terms of being able to travel without placing reliance on the private car. Travel by walking, cycling, bus and train are all realistic options for residents and visitors to the site.
- 9.4.2 In addition, parking provision for the dwellings is in excess of the minimum parking standards.
- 9.4.3 The proposed development will provide electric vehicle charging points in accordance with West Sussex County's requirements.
- 9.4.4 An assessment of the additional movements using either the single access, or the roundabout, would not generate an unacceptable impact on highway safety nor have a severe impact on the road network when considering the proposed development.

10 Ecology

- 10.1 A Preliminary Ecological Appraisal Report was provided by "enims". This supports the pre-application submission and was instructed to assess whether a development of the scale depicted in the proposals would be appropriate in ecological terms and demonstrate that by re-using land that was "previously developed" (the northern section of the site, Character Area 1) that it is not of high environmental value due to it being brownfield land and also that the other two Character Areas were also appropriate for development.
- 10.2 The PEA 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).
- 10.3 The report also considered Biodiversity Net Gain. It notes that 10% will be required for the development and whilst substantial additional tree and hedge planting is

proposed as part of the development, some of the 10% will require offset. It is proposed that this will be provided on the land to the north of the proposed site, Whitelands Farm. This will require a further assessment as part of the developing planning application.

- 10.4 The proposed schemes retain almost all of the existing trees on site with only a couple needing to be removed to facilitate the internal highway and footpath network. These are significantly offset by the addition of more than 100 trees which are proposed as part of the scheme.

11 Water Neutrality

- 11.1 A Water Neutrality Statement (WNS) has been provided by Motion which demonstrates how the proposed development will achieve water neutrality.
- 11.2 It confirms that all new and reserved matter planning applications must demonstrate that the development is water neutral and that they do not result in a significant effect.
- 11.3 The Water Neutrality statement sets out the following:-
- Baseline calculations for the existing development.
 - Additional demand as a result of the proposed development.
 - Water reduction measures such as efficient fixtures and fittings and rainwater harvesting.
 - Measures to offset any remaining deficit following the above.
- 11.4 A separate report on rainwater harvesting management and a maintenance plan, also provided by Motion, is attached to this pre-application submission which sets out the principles which apply to the development for the long term management and maintenance of the rainwater harvesting systems.
- 11.5 The report also provides a robust inspection and maintenance plan for the lifetime of the development and to ensure optimum operation of the rainwater harvesting systems that they will be continually maintained. This will ensure that the proposed development will remain water neutral.
- 11.6 The WNS also demonstrates how the development proposes to purchase credits from a suitable bespoke offsetting scheme **so that there is no additional rainwater requirement within the Sussex North Water Supply Zone (SNWSZ).**

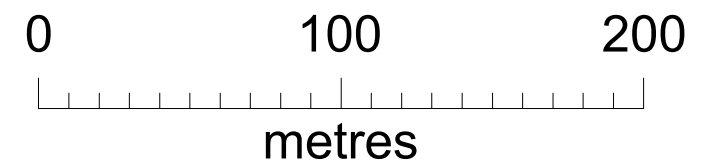
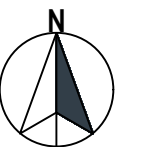
12 Conclusion

- 12.1 The Council are asked to consider whether the principle of developing in the form shown in this pre-application submission would be acceptable.
- 12.2 The site has been demonstrated to be clearly in a sustainable location with the nearest shop being 185m away and the nearest bus stops being 50m and 100m away respectively. In addition, the facilities and services of Codmore Hill and Pulborough are within walking distance by level pavements and cycling distance.
- 12.3 The local highway network can accommodate the traffic generated by the site during peak periods without resulting in a severe residual cumulative impact. It also provides electric charging points for all dwellings and parking above the minimum national and local guidance.
- 12.4 A Preliminary Ecological Assessment has been carried out which confirms that the proposed development should be able to proceed as indicated on the Master Plan drawings subject to appropriate mitigation, enhancement measures and further surveys.
- 12.5 The Water Neutrality Statement confirms that the proposal will be water neutral once complete, therefore, satisfying the requirements of Natural England.
- 12.6 The tilted balance is engaged as the Council cannot demonstrate a 5YHLS which is just one year. In addition, as the development will be "water neutral" the tilted balance is engaged.

MCA Architects



Site Location Plan
Scale 1:2500



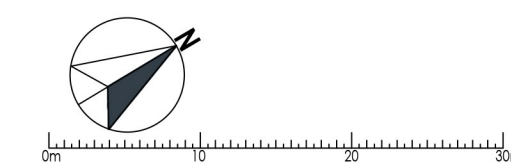
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PROJECT: Development at Toat Cafe, Stanes Cottage and Stanes Farm, Stane Street, Pulborough, West Sussex RH20 1DN	DATE: 03.24	SCALE: 1:2500
	JOB NUMBER: 1726	PAPER SIZE: A3
DRAWING TITLE: Site Location Plan	DRAWING NUMBER: 1726/S-03A	



UNIT	Flat	House	No. of Bedrooms
1	X		1
2	X		1
3	X		1
4	X		1
5	X		1
6	X		1
7	X		2
8	X		2
9	X		2
10	X		2
11	X		2
12	X		2
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91		X	4
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93		X	3

Proposed Site Plan
Option 1
Scale 1:500



MCA

ARCHITECTS

MICHAEL CONOLEY ASSOCIATES

PROJECT:
Toat Cafe, Stanes Cottage and Stanes Farm
Stane Street, Pulborough, West Sussex RH20 1DN

DATE:
05.25

SCALE:
1:500

JOB NUMBER:
1726

PAPER SIZE:
A1

DRAWING TITLE:
Proposed Site Plan
Option 1

DRAWING NUMBER:
1726/SP-01

Abbey House Holey Court South Street Farnham GU9 7QG

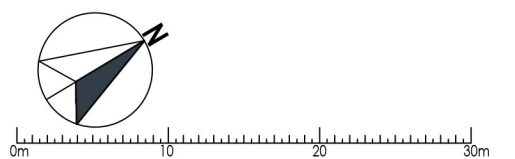
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UNIT	Flat	House	No. of Bedrooms
1	X		1
2	X		1
3	X		1
4	X		1
5	X		1
6	X		1
7	X		2
8	X		2
9	X		2
10	X		2
11	X		2
12	X		2
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14	X		2
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91		X	4
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93		X	3

Proposed Site Plan
Option 2
Scale 1:500



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PROJECT:
Toat Cafe, Stanes Cottage and Stanes Farm
Stane Street, Pulborough, West Sussex RH20 1DN

DRAWING TITLE:
Proposed Site Plan
Option 2

DRAWING NUMBER:
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