



Horsham
District
Council

HORSHAM DISTRICT CO/UNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Hornbrook Farm Brighton Road West Sussex
DESCRIPTION:	Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.
REFERENCE:	DC/26/0530
RECOMMENDATION:	Advice / No-Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION:	
The proposal site is located on the southeast edge of Horsham town and comprises a proposal of up to 180 dwellings. The site is currently located outside the existing BUAB on the edge of High Weald National Landscape (formerly known as High Weald AONB). Land at Hornbrook Farm is identified in the emerging Horsham Local Plan 2023-40 ('eLP') for approx. 100 dwellings under Policy HA10: Land at Hornbrook Farm. Horsham is identified as the top settlement in the hierarchy (Policy 4 – HDPF). The town is well served as the district's main settlement and transport hub. Residents have access to pubs, shops, recreation grounds including leisure centres, community centres, primary/secondary schools as well as tertiary services such as banking and financial services. As such Horsham Town is a sustainable location which is suitable for development. As a site proposed for allocation in the eLP, the principle of residential development is considered acceptable subject to meeting the policy requirements of the development plan and having regard to the eLP.	

MAIN COMMENTS:

Introduction

Preamble

These comments consider national and local policy (emerging and adopted) that relate to the proposed development. They do not set out advice on every issue that may be of relevance to the proposal and do not reference every policy in its entirety. Instead, the comments focus on the policies of the Horsham District Local Plan (HDPF), the emerging Horsham District Local Plan 2023-40 ('eLP') and the Blueprint Neighbourhood Plan (BNP) as relate to the principle of development. Regard is given as to whether the proposal is compliant with Policy HA10: HOR1: Land at Hornbrook Farm (100 homes).

The comments do not discuss the Council's Housing Land Supply position or Housing Delivery Test performance in any detail. However, the case officer will be aware that the 'tilted balance' is in effect per NPPF para 11dii) unless it is assessed that the exemptions identified in 11di) and related footnote 7 apply and further information in relation to this is provided in the Shaping Development in Horsham District Planning Advice Note (SDPAN, 2025).

Proposal

The proposal site is located outside the existing HDPF Built-Up Development Boundary (BUAB) and comprises of up to 180 no. dwellings, (including 35% affordable housing units). The site extends to 9.23 hectares and is located on the eastern edge of Horsham Town. The site is bounded by A281 (Brighton Road) on its southern boundary and Domesday Lane on its eastern flank. To the north lies a Hornbrook stream with residential development beyond. To the south is a garden centre (Hilliers). The site also abuts the boundary of the High Weald National Landscape to the east of Domesday Lane but is not within it.

Development Plan

The development plan consists of the Horsham District Development Framework 2015 (HDPF), the West Sussex Joint Minerals Local Plan (2018), the West Sussex Waste Local Plan (2014) and the made neighbourhood plan covering the area which is the Horsham Blueprint (HB, made December 2022). The respective Minerals and Waste Local Plans are, to my knowledge, not relevant in this case, but the HDPF and HB are. The emerging Horsham District Local Plan (HDLP 2023-40) (eLP) is a material consideration and is discussed in the section below.

Horsham District Planning Framework (2015-31)

Policy 3: Development Hierarchy (advice)

HDPF Policy 3 identifies Horsham town as the main settlement in the district in the development hierarchy. Horsham is well serviced with good range of services; is well served with regular rail links to London terminals and has good employment opportunities. Accordingly, it is considered that under the terms of the HDPF, Horsham is a sustainable location for growth and development.

Policy 4: Settlement Expansion (advice)

Strategic Policy 4 of the HDPF support expansion of settlements subject to specified criteria including whether allocated in the Development Plan, settlement hierarchy context and meeting local housing need. Paragraph 5.12 of the SDPAN sets Policy 4 of the HDPF in the

context of current circumstances regarding the 'tilted balance' and status of the emerging Local Plan (see below). It is considered that the SDPAN would support in principle the development given the prevailing circumstances notwithstanding that, in any case, the site is allocated in the emerging Horsham Local Plan.

Policy 16: Meeting Local Housing Needs (advice)

The proposed development comprises of up to 180 dwellings with 35 % offered as affordable. The overall percentage of affordable housing provided within the scheme equates to 36% demonstrating compliance with Policy 16 (3a) stating a requirement of 35% affordable on development providing 15 or more dwellings on-site. Whilst the proposal has indicated policy compliance with the affordable housing provision, the applicant has also advised on the proposed housing mix (para 10.47-10.48 Planning Statement – Future Planning, March 2026) will dealt with at Reserved Matters stage. It is advised that in line with Policy 16(1), account must be taken of the latest SHMA's recommended housing mix and should also takes account of the recommendations of the Council's Housing team.

Policy 30: Protected Landscapes

A key constraint is the site's relationship with the High Weald National Landscape, which lies immediately to the east of Domesday Lane. Although the site is not located within the designated area, it forms part of its setting and contributes to its character and appreciation. In this context, Policy 30 of the HDPF requires development to conserve the natural beauty, character, and setting of the National Landscape.

In assessing the proposal against Policy 30, the following are highlighted in relation to the site and its capacity for housing:

- Preserving the rural edge character along Domesday Lane
- Avoiding or mitigating an overly urban form of development in views into and out of the National Landscape
- Seek an appropriate landscaped transition between the built-up area and open countryside
- Explore opportunities to deliver meaningful green infrastructure, biodiversity enhancements, and landscape buffering

Policy 31 Green Infrastructure and Biodiversity

Policy 31 of the HDPF supports new development which retains and/or enhances significant features of nature conservation on development sites. There is an opportunity to extend and enhance the Riverside Walk at this location which has been an aspiration for the local community

High Weald AONB Management Plan 2024-2029

The Management Plan is a statutory document which defines the natural beauty of the AONB and sets out a twenty-year strategy. The High Weald AONB Management Plan is a material consideration to this application should be given to due regard. Horsham District Council is also a member of the High Weald Joint Advisory Committee.

Horsham District Local Plan (HDLP) 2023-2040

The Council submitted the Horsham District Local Plan 2023-2040 (HDLP) to the Secretary of State for examination in July 2024. The HDLP sets out policies and proposals intended to guide development in the district, excluding the South Downs National Park, up to 2040. Examination hearings started in December 2024, but the remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024. On 22 April 2025 the Council published the Inspector's subsequent Interim Findings Letter which has recommended that the Plan be withdrawn, due to his view that the Council has failed to satisfactorily comply with the legal Duty to Co-operate. However, on 28 January 2026, the Council was informed that a new Inspector, Mr Jonathan Bore, has been appointed in place of the previous Inspector, Luke Fleming. On 21 April 2026, Horsham District Council resumed hearing sessions under Inspector Jonathon Bore. At the time of writing, the Inspector has held three hearing sessions on housing requirement, housing supply and homes to meet the needs of all the community. He has requested the Council undertake more work and invited the Council to propose main modifications to be published in the summer for consultation (details are set out in his letter IDJB05 dated 5 May and published on the examination website). Further Hearings are scheduled for the Autumn.

It is therefore established that the submission HDLP remains the emerging Local Plan (eLP) in the context of NPPF para 49 at the time of writing. Nevertheless, NPPF paragraph 49 indicates that only limited weight should be given to its policies.

In the Site Allocations section of the eLP (Chapter 10), Policy HA10 Land at Hornbrook allocated the site for 100 homes. It is also noted there is explicit policy reference made to provide safe pedestrian and cycling crossing points over the A281 (Brighton Road) from the site and create an extended Riverside Walk along Hornbrook Stream. As a site proposed for allocation, the principle of residential development is considered acceptable subject to meeting the policy requirements of the development plan. It will be for the case officer to determine if the applicant has satisfied the policy requirements.

Policy 30: Protected Landscapes

The site is identified in the emerging Horsham Local Plan for residential development, which is a material consideration and carries limited weight but reflects the Council's assessment of an appropriate level of development having regard to site-specific constraints, infrastructure capacity, and the need to secure high-quality, landscape-led design. It is noted that the proposed number of homes exceeds the eLP site allocation for 100 homes. The scale of development currently proposed materially exceeds what considered; this underlines the need to ensure that the scheme responds appropriately to the characteristics of the site. However, it is for the case officer to determine the appropriate capacity in light of all relevant evidence, noting that the draft eLP policies are subject to change whilst the examination is ongoing.

Blueprint Neighbourhood Plan

The Blueprint was formally considered and voted on by Full Council on the 14 December 2023, the HBBNDP was 'made' with effect from 15 December 2022. The Blueprint forms part of the Development Plan for Horsham District.

The Blueprint Neighbourhood plan does not allocated land for development, therefore NPPF paragraph 14 does not apply here. It is nevertheless advised that non-housing neighbourhood plan policies should be afforded equivalent weight as the HDPF. There are several 'aims' which can also be found within the plan. They do not form part of the development plan but

reflect the community's desires to address issues, and therefore the applicant at reserved matters stages:

1. Policy HB2: Housing mix.
2. Policy HB3: Character of Development
3. Policy HB4: Design of Development
4. Policy HB5: Energy and Design
5. Policy HB10: Green and Blue Infrastructure and Delivering Biodiversity Net Gain
6. Policy HB12: Encourage Sustainable Development
7. Policy HB13: Provision of Sport, Leisure and Recreation Facilities

Policy HB10: Green and Blue Infrastructure and Delivering Biodiversity Net Gain

Development is supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. The Blueprint (Policy HB10) as part of the development plan advocates a Riverside Walk which is a continuous green corridor/green infrastructure walking route set within Horsham Town. The proposal at Hornbrook presents an opportunity to close the gaps in the route where it is currently fragmented.

Extent of policy comments

Comments in this response are limited to matters which relate to the principle of development and are not exhaustive. They are intended to aid the case officer's detailed assessment and reporting and are made without prejudice to the recommendation of the case officer. I have not considered the finer details of the proposal, and it is for the case officer to assess the merits of the proposal against all relevant policies.

ANY RECOMMENDED CONDITIONS:

n/a

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DATE:	19 May 2026