



Land at Hornbrook Farm, Brighton Road, Horsham

PLANNING STATEMENT

Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.

March 2026

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1.0 INTRODUCTION

1.1 This Planning Statement is submitted on behalf of the applicant Jaynic Properties Ltd and Hornbrook Developments LLP, to Horsham District Council for “*Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access*”, in respect of Land at Hornbrook Farm, Brighton Road, Horsham” (‘the Site’).

1.2 The planning application is supported by the following drawings and documents:

- Planning Application Forms and Certificates, including CIL Form
- A covering letter with submission schedule
- Planning Statement
- Statement of Community Involvement
- A Site Location Plan at 1:1250 (CSA/7416/101 Rev G)
- Parameter Plan (CSA/7416/102 Rev L)
- Building Heights Parameter Plan (CSA/7416/103 Rev H)
- Illustrative Masterplan (CSA/7416/108 Rev E)
- Air Quality Assessment
- Arboricultural Impact Assessment (including Survey, Tree Protection, Retention And Removal Plans)
- Cultural Heritage Desk-Based Assessment
- Geo-Environmental Ground Investigation and Assessment
- Biodiversity Net Gain Report, including BNG Metric
- Design and Access Statement (Rev E)
- Preliminary Ecological Appraisal, detailed survey technical notes and EcIA
- Flood Risk Assessment (including Drainage Strategy)
- Transport Assessment (including Safe Routes to School Assessments)
- Proposed Access Arrangement Plan (DR-C-SK001 Rev H)
- Interim Residential Travel Plan
- Landscape and Visual Impact Assessment
- Landscape Strategy Plan (2789-LLA-ZZ-00-DR-0001 Rev P03)
- Noise Impact Assessment

- Sustainability and Energy Statement
- S106 draft Heads of Terms included within this statement

1.3 This statement provides a description of the site; the relevant planning history; a description of the proposals; an overview of the current planning policy context; a summary of the consultations undertaken at pre-application stage; an assessment of the proposals against planning policy; and an overall summary of the proposal.

2.0 BACKGROUND

- 2.1 Following the July 2024 Written Ministerial Statement entitled “Building the homes we need” the Government continues to recognise an acute national shortage of housing¹. Current and proposed national policy seeks to boost housing supply, e.g. current NPPF (paragraph 61) and there is a recognised and acute need for housing in Horsham given the current 5-year housing land supply position and latest published Housing Delivery Test position. This scheme seeks to address delivery of both affordable and market homes where there is an acute need
- 2.2 This application therefore seeks to make best use of the site in order to deliver up to 180 new homes for the District with a mix of unit sizes and tenures. This follows significant work to bring this site forward as part of the Council’s aspirations for new homes that better serve Horsham as the District’s primary town.
- 2.3 The proposal is brought forward in the context of the site having been assessed by the Council in their Regulation 19 Site Assessment Report ‘Preferred Smaller Sites’ (Dec 2023) and is suitable for residential development. This has been carried forward in the recent Council document “Shaping Development in Horsham District” (SDPAN) which is a material consideration in determining planning applications and was endorsed by Cabinet on 17 September 2025.

¹ Written statements - Written questions, answers and statements - UK Parliament.

3.0 SITE CONTEXT

- 3.1 The application site is located to the eastern aspect of Horsham, directly north of A281 Brighton Road and to the west of Doomsday Lane. The site is located on the south of the built-up part of the town on the outside edge of the settlement boundary. Horsham town centre is approximately 1.3 miles to the north west.
- 3.2 The application site, as defined by the red line, comprises 9.23ha, which consists of three fields divided by two existing hedges which run in a north south direction.

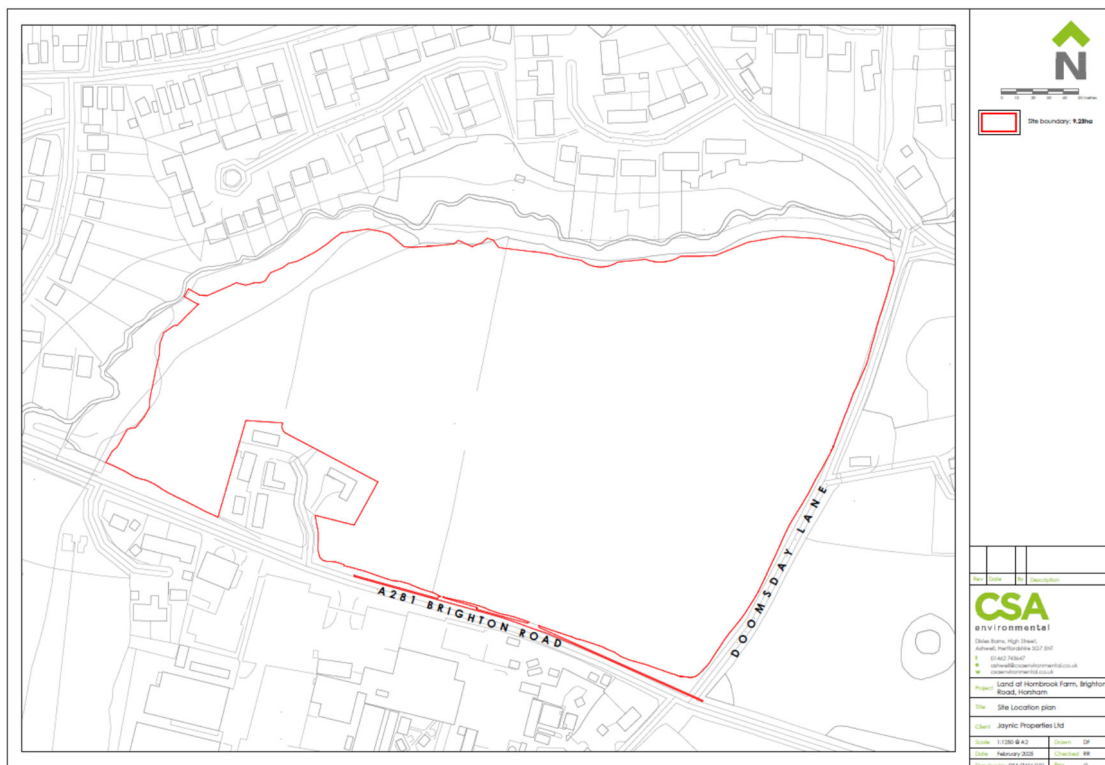


Figure 1: Site Location Plan (NTS)

- 3.3 The High Weald National Landscape (former designation known as an Area of Outstanding Natural Beauty) is located immediately to the east of the site beyond Doomsday Lane. The suburban edge of Horsham is located immediately north of the site, bounded by Horn Brook.
- 3.4 To the south of the site there is a large garden centre / retail complex containing various commercial units and a large parking forecourt. The A281 Brighton Road

runs immediately along the south of the site and provides good connections to the surrounding area.

- 3.5 The existing topography rises from Horn Brook to the west from a lowest level of approximately 48m up to 65m near to the southeast corner of the site at the junction of Doomsday Lane and Brighton Road.
- 3.6 There are no Tree Protection Orders (TPOs) on the site, but there are trees and hedgerows which have high amenity value. These are predominantly located towards the edges of the site to the south and the west or tight along the boundaries and outside of the intended development area within the site.
- 3.7 There are three gated farm entrance points; the first from the access road serving Hornbrook Farmhouse and the converted barns, the second on the south boundary opposite the garden centre entrance, and the third mid-way along Doomsday Lane to the east.
- 3.8 Existing pedestrian routes and bus stops provide easy connection with Horsham and the numerous surrounding facilities. Horsham Rail Station is only a 6 minute bus ride or a 25 minute walk.
- 3.9 The former Hornbrook Farm buildings are located towards the southwestern corner of the site and include Hornbrook Farmhouse, Hornbrook House and other residential properties which are all accessed via a dedicated access off Brighton Road.

4.0 RELEVANT PLANNING HISTORY

- 4.1 There is very limited planning history on this site given there are no existing buildings on the site. The land is currently used for agriculture with access off both Brighton Road and Doomsday Lane. There have been no previous planning applications for development.
- 4.2 This is save for an application by Waldon Telecom Ltd, which was submitted on part of the land at the eastern end of the site with planning reference: DC/06/0385 for the following development proposal: Erection of 1 x 20 metre telecommunications timber monopole with 3 antennas and microwave dishes, equipment cabin(Land South West of West Lodge, Doomsday Lane).
- 4.3 The application was refused on 10 April 2006. That decision was subsequently appealed under Appeal Reference: APP/Z3825/A/06/2027032 and dismissed by the Inspector on 29 January 2007.

5.0 PRE-APPLICATION PROCESS

- 5.1 The applicant has engaged in extensive pre-application discussions with Horsham District Council since the early phase of the design evolution. Multiple meetings have been held with HDC Planning Officers to discuss the design principles of the development, with reference to relevant local planning policies and guidance documents. A site visit was also undertaken by the Planning Officer and Landscape Officer.
- 5.2 Pre-Application advice (R/N: PE/17/0129) was initially sought in June 2017, with formal advice from HDC received on 16th August 2017 indicating that an application for development would be unacceptable in principle as the site did not form part of the District's development strategy. However, officers recommended that the site should be submitted for allocation in the next iteration of the Local Development Plan through the SHLAA.
- 5.3 A second pre-app was submitted (R/N: PE/23/0242) in November 2023, to which a formal response was received on 23rd February 2024. The response confirmed that the site was included in the Reg 19 HDLP as a housing allocation site and noted that, while the HDLP carried limited weight in decision making at that time, it was expected that, as the process advanced, the weight that could be attributed to that allocation would increase – such that the residential development of the site would be acceptable in principle.
- 5.4 Aside from the issue of principle, the other main considerations on the site, to be addressed as part of any subsequent planning application, included general layout, design, density, open space requirements, access, parking, sustainable transport, heritage assets and noise mitigation.
- 5.5 A third pre-app was submitted in June 2025 which sought to address the elements raised in the earlier advice with a scheme of up-to 190 homes. The public consultation strategy was discussed during this pre-app meeting informally and the Case Officer was comfortable with the level of engagement proposed by Jaynic

Properties and the project team, and a formal response was received from the Council on 26th September 2025.

- 5.6 The response confirmed that HDC is supportive of residential development on this draft-allocated site and recognises the significant housing-supply shortfall and the tilted balance being engaged. It indicated that a proposal for up to 190 dwellings could be considered acceptable in principle provided the scheme addresses the site's landscape sensitivities, especially in relation to the National Landscape, and secures high-quality design, strong green infrastructure and provides 35% of the dwellings as affordable housing. Early dialogue with the housing team, careful topographical design and proactive community engagement were encouraged in advance of the submission of a planning application.
- 5.7 Pre-application meetings were also held with West Sussex County Council, including a meeting with Highway Officers to develop the scheme in respect of highway design and accessibility on 4th March 2025, following by ongoing correspondence; and with the Lead Local Flood Authority in relation to drainage on 1st December 2025. Further details relating to these pre-application enquiries can be found in the Transport Assessment and Flood Risk Assessment.
- 5.8 Discussions with Forest Neighbourhood Council have taken place initially on 1st April 2025 to introduce the site and the development team followed by a further presentation on 20th October 2025. Ward Councillors were also approached in May 2025. A public consultation event was held on Wednesday 12th November, for members of the public to engage with the project representatives and provide feedback on the draft proposals. Further details relating to community consultation can be found in the Statement of Community Involvement.
- 5.9 The proposed development has evolved positively as a result of these discussions. Detail about how the proposed development has responded and evolved in response to the advice provided by the Officers is within the Design and Access Statement submitted with the planning application.

6.0 SCREENING OPINION REQUEST

6.1 The most recent planning history relates to an application for a formal Screening Opinion from the Council to determine whether an Environmental Impact Assessment (EIA) is required in respect of this forthcoming planning application. That was considered under Council Reference: EIA/26/0001 and HDC's negative opinion was adopted on 29 January 2026 confirming that the proposal would not require an Environmental Statement to be submitted.

6.2 HDC confirmed that the development proposal would fall under Schedule 2 of the EIA Regulations, item 10(b) (urban development). The scale and nature of the proposal exceeds the criteria outlined in Schedule 2 of the Regulations, and they considered whether the development would be likely to have significant effects on the environment. The conclusion followed that:

On balance, it is considered that the overall scale and nature of the impacts that would arise from the scheme would not require an EIA, and that the environmental issues arising from the development can be dealt with as part of the usual planning application process.

6.3 Further advice recommended that any planning application submitted should be accompanied by a Landscape Visual Impact Assessment that considers the High Weald National Park Management Plan Objectives. The Environment Agency flood maps are likely to be updated at some point in 2026 and these should be used in any Flood Risk Assessment submission.

6.4 In line with the advice set out in the Screening Opinion the application is now submitted alongside these assessments, and also a full suite of technical documents. All these documents support the Council's previous conclusions that the proposals are unlikely to lead to likely significant effects on the environment and therefore it is clear that the conclusion that no Environmental Statement is required remains sound.

7.0 PROPOSED DEVELOPMENT

- 7.1 The proposal is sought in outline form for the following description of development:

Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access

- 7.2 The overarching parameters for the proposed development of up to 180 homes are set out in the submitted Parameter Plan (CSA/7416/102). The Plan is guided by the robust design principles agreed at pre-application stage, ensuring the delivery of a genuinely landscape-led development. It responds sensitively to the Site's relationship with the High Weald National Landscape (NL), its existing landscape features, and the wider contextual setting.
- 7.3 A key design principle is the creation of a substantial area of public open space in the south eastern corner of the Site, set back from Doomsday Lane by up to 115m. This space connects seamlessly to a green corridor running north along the eastern boundary, forming a central component of the landscape framework. Together, these areas will soften the visual transition between the rural landscape to the east and the new development, whilst establishing an informal parkland character through extensive tree and hedgerow planting.
- 7.4 This green space will also respect the setting of nearby listed buildings and create a distinctive green gateway to Horsham along Brighton Road.
- 7.5 More broadly, the landscape-led approach embedded within the Parameter Plan shapes the entire masterplan. It prioritises, where practical, the retention of existing trees and hedgerows within public open spaces, the strengthening of established hedgerow networks, and the provision of extensive areas of accessible open space. These layered landscape elements are woven together to form a connected network of green spaces that will support daily interaction with nature, promote healthier lifestyles, and foster wellbeing and community cohesion. The green spaces within the Site also enable the scheme to deliver Biodiversity Net Gain (BNG)

on-site. Together, these open spaces equate to 47% of the total Site area (excluding public highway).

- 7.6 The Parameter Plan also identifies a new primary access for vehicles, pedestrians, and cyclists from Brighton Road, along with an emergency access from Doomsday Lane. The detailed design of the new access onto Brighton Road is shown on the submitted Proposed Access Plan (62726/RJL/XX/XX/DR/C/SK001 H).

Residential Development Area

- 7.7 The outline planning application makes provision for up to 180 new homes within a residential development area measuring 4.83 hectares. Of these, 35% will be delivered as affordable housing.
- 7.8 In accordance with Policy HB2 (Meeting Local Housing Needs) of the Horsham Blueprint Business Neighbourhood Plan (HBNP), the detailed design stage will ensure that the housing mix responds directly to identified local needs, with particular emphasis on providing homes suitable for first-time buyers and young families wishing to move into or remain in the area. Notwithstanding that the housing mix will be agreed through future detailed design/Reserved Matters, an Illustrative Masterplan accompanies the planning application and includes a mix that has been designed in consideration of the recommendations for Horsham set out in the Northern West Sussex Strategic Housing Market Assessment, 2019.
- 7.9 Equally, reflecting another key objective of Policy HB2, the inclusion of new bungalows located in the eastern and south eastern parts of the Site will offer suitable downsizing opportunities for older residents.
- 7.10 The overall mix of homes will support the delivery of a sustainable, inclusive, and well-balanced new community.

Green Infrastructure

- 7.11 A significant proportion of the Site will comprise green infrastructure to form a connected and accessible network of public spaces. The green infrastructure

equates to 47% of the total Site area, and will provide a high-quality and attractive setting for the new homes.

- 7.12 At 4.31 hectares, the amount of green infrastructure proposed far exceeds the quantity standards set out in HDC's Open Space, Sport and Recreation Review (June 2021).

Building Heights

- 7.13 The Building Heights Parameter Plan (CSA/7416/103H) outlines the proposed upper height limits for buildings across the Site. Most of the proposed homes will be no more than 2 storeys in height, reflecting the prevailing scale and character of the adjacent residential areas.
- 7.14 However, it is considered that there is scope for some 2½-storey homes where the topography allows, and within the central parts of the Site, where slightly taller buildings can be accommodated without affecting existing properties to the north, northwest, or those that indent the Site at Hornbrook Farm.
- 7.15 Given the Site's proximity to the High Weald NL, the Building Heights Parameter Plan proposes bungalows along the edge of the parkland open space in the east of the Site. Together with existing and proposed landscaping, this will help to create a gentle and sensitive transition between the new development and the NL to the east.
- 7.16 The open space in the south eastern part of the Site coincides with its highest point, at around 65m Above Ordnance Datum (AOD). Positioning bungalows away from this high point ensures they sit comfortably within the proposed parkland setting, reducing their visibility.

Illustrative Masterplan

- 7.17 The Illustrative Masterplan (CSA/7416/108E) shows how the proposed development will form a logical and integrated extension to the existing settlement. The new homes will have a clear and coherent relationship with the built

development to the north, south and west, whilst the strong physical boundaries created by Brighton Road and Doomsday Lane provide clear enclosure to the east and south east.



Figure 2: Illustrative Masterplan (NTS)

- 7.18 The large area of public open space in the south eastern part of the Site, anchored by the prominent existing oak tree, will create a distinctive gateway for the development and for people approaching Horsham from the east. The proposed bungalows overlooking this space will contribute to an attractive, well used and welcoming environment that celebrates the Site's existing landscape features.
- 7.19 The Illustrative Masterplan also demonstrates how a view corridor towards the spire of St Mary's Church to the west will be preserved. This view, accessible from the eastern part of the Site, will be maintained through the careful alignment of streets and green spaces to the west. Retaining this view will help to root the proposals within their wider setting and will contribute positively to the development's strong overall sense of place.

- 7.20 All dwellings would have access to good-quality amenity space, without having a harmful amenity impact on neighbouring properties.
- 7.21 The Illustrative Masterplan shows a variety of housing typologies that will reflect the local housing needs identified in Forest Ward and accord with HBNP policy. As layout is a reserved matter, it will be considered in detail at a later planning application, however, the key principles adopted would provide an appropriate mix to be agreed with the HDC Housing Team. A range of purpose-built maisonettes, terraced, semi-detached, and detached houses throughout the Site, reflecting a logical extension to the existing settlement to the north and west.
- 7.22 With such a significant proportion of the Site remaining as public open space, the new homes will be set within an attractive and well-defined green framework. Enhanced by new landscaping, these spaces will promote wellbeing, support interaction with nature, and deliver a high-quality landscape setting. The homes will overlook these areas of green space to provide strong levels of natural surveillance and attractive aspects, creating the basis for a safe and well-used public realm.

Open Space Corridors

- 7.23 A key design principle underpinning the proposals is the network of green infrastructure corridors, which provide structure and logic to the proposed housing parcels. These corridors are conceived as multi-functional spaces accommodating new and existing landscaping, children's play, SuDS swales, and new recreational routes. Opportunities for combining nature with exercise provide wellbeing benefits through the creation of proposed Play-on-the-Way and Trim-Trails around the development. A further recreational opportunity is proposed with a locally equipped area of play (LEAP) provided towards the centre of the site linked to the interconnected green corridors.
- 7.24 In response to pre-application feedback from HDC, the Illustrative Masterplan and Landscape Strategy Plan (2789-LLA-ZZ-00-DR-0001-P03) have been prepared to demonstrate how the open space corridors can function as meaningful landscape

spaces that retain existing features, whilst providing space for new planting to supplement and reinforce the landscape framework.

- 7.25 Notwithstanding that layout is a reserved matter, both the Illustrative Masterplan and Landscape Strategy Plan show that careful consideration has been given to maintaining the integrity of the open space corridors. Importantly, the plans take full account of the relationship between these corridors and the adjacent street spaces, including on-street parking. Together, they demonstrate that the design of the open space corridors has been robustly tested and can be delivered as high-quality, meaningful open spaces at the Reserved Matters stage.
- 7.26 The Parameter Plan also identifies the location and extent of the open space corridors alongside the wider open space network. These areas align with those shown on the Illustrative Masterplan and Landscape Strategy Plan. As such, the Parameter Plan can be secured by a suitably worded planning condition to ensure that the extent of the open space corridors is protected at the Reserved Matters stage.

Riverside Walk

- 7.27 In accordance with Policy HOR1 of the emerging Local Plan, a new riverside walk is proposed along Horn Brook. This circular route, as shown on the Illustrative Masterplan, forms an integral part of the interconnected open space network. As part of an innovative approach to integrating SuDS features, the riverside walk is positioned along the top of an embankment forming the northern edge of a new linear swale that follows the natural contours of this part of the Site.
- 7.28 The earthworks associated with the swale and embankment are located where the existing topography is steepest, tying into ground levels along the northern and north western boundaries before the land falls more sharply into the steep sided ghyll containing the Horn Brook. This approach ensures that built development is positioned away from the steepest parts of the Site. As with the other green corridors, the Illustrative Masterplan and Landscape Strategy Plan, together with

the Parameter Plan, demonstrate that the riverside walk can be delivered without compromising its intended character at the Reserved Matters stage.

Density

- 7.29 The development achieves an average density of 37 dwellings per hectare (dph). It is considered that this density makes an efficient use of the Site, whilst respecting existing densities within the local area and being sensitive to the Site's existing landscape characteristics. The gross density (total Site area divided by the proposed number of homes) of the proposed development equates to 20 dph. This reinforces that the proposed quantum of development is appropriate.
- 7.30 In common with the proposed building heights shown on the Building Heights Parameter Plan, the lowest densities will comprise the bungalows overlooking the open space in the eastern and south eastern parts of the Site in order to create a gentle and sensitive transition with the High Weald NL. Similarly, the new homes fronting Brighton Road will comprise lower densities in order to create a more informal character that appropriately addresses the entrance to Horsham.
- 7.31 Elsewhere, slightly higher densities will assist in marking the importance of the primary street running through the development, and to provide a mix of house types and styles in accordance with the principles of providing a mix of housing as per the provision of Policy HB2 of the HBNP.

Access

- 7.32 The proposed site access is in the form of a simple priority junction onto the A281 Brighton Road to the west of the junction with Doomsday Lane, with a separate pedestrian access to be provided to the west, which could also include an access for emergency vehicles from Doomsday Lane. The proposals also include the relocation of the eastbound bus stop and signal-controlled crossing point to provide access to the existing footway on the south side of the road.

- 7.33 The new access onto Brighton Road has been subject to an independent Road Safety Audit, in consultation with the Highways Authority, which has confirmed that a safe vehicle access can be provided.
- 7.34 In addition, the development supports a reduction in the existing 40mph speed limit to 30mph. This would be subject to the preferences of the highway authority and whilst desirable, the proposed development and access arrangements are not dependent upon it.

Parking

- 7.35 At the detailed design stage, an appropriate mix of car parking arrangements will be provided to ensure flexibility and convenience for residents and visitors. Parking will be integrated positively into the development to minimise its visual impact; provide safe and convenient access to vehicles for both residents and visitors; and to ensure that parked cars do not obstruct pedestrian or cycle routes.
- 7.36 Car parking provision will accord with West Sussex County Council's (WSCC) Guidance on Parking at New Developments (September 2020). The WSCC residential standards use Parking Behaviour Zones (PBZs) to reflect local parking demand, with the Site located within PBZ 2.
- 7.37 At the detailed design stage, cycle parking is to be provided at 1 space per 1 or 2 bedroom house, and 2 spaces per 3+ bedroom house. Apartments will have either 0.5 spaces for up to 2 bedrooms if shared or otherwise 1 space per apartment will be provided.

8.0 BENEFITS OF THE PROPOSAL

- 8.1 Open Market Housing: Horsham District Council is currently unable to demonstrate a five year housing land supply – with the latest Annual Monitoring Report (Published December 2025) calculating a 1.7 year HLS, a deficit of 5,286 dwellings. This proposal provides the opportunity to secure up to 180 dwellings (including bungalows) with up to 35% of the total number being affordable housing.
- 8.2 Affordable Housing: The proposals include 35% of the total housing provision which will assist in meeting the local need for affordable housing and provide a greater mix of tenures in the town.
- 8.3 Opportunity for a net gain in biodiversity: The development proposals for the site will retain all significant trees and the majority of hedgerows. The supporting Biodiversity Net Gain Report proposes measures to exceed the required net gain in biodiversity at the site, achieving 10.9% net gain for area-based habitats, 25.2% net gain for linear habitats (hedgerows) and 15% net gain for watercourses. The Illustrative Masterplan demonstrates the set back of development from the eastern and southern edge with a significant amount of parkland open space for public use.
- 8.4 Job creation: Research commissioned by the Home Builders Federation (HBF)² estimates that building 180 homes could support the employment of 625 people and provide approximately seven apprentices, graduates or trainees.
- 8.5 Play space provision: The scheme seeks to provide play facilities for use by future and existing residents in proximity to the site. There will be a locally equipped area of play (LEAP) in the centre of the north of the site, with additional play facilities provided as trim trails and play along the way features which are located along the riverside walk. Totalling 4.31ha the open space provision within the scheme is more than double the area (2.0ha) recommended by the HDC Open Space, Sports and Recreation Review (June 2021).

² The Economic Footprint of House Building in England and Wales - Home Builders Federation

8.6 Enhancing the vitality of Horsham through an increased number of residents which will have the potential to spend money locally in the Town.

8.7 HBF research³ indicates that a development of 180 homes on average could:

- Increase open space, community sport, leisure spending by £162,000
- Generate £8,100,000 towards new affordable housing
- Generate £1,125,000 towards infrastructure
- Generate £4,800,000 in tax revenue, including £362,250 in council tax revenue

8.8 Additionally, as there is an adopted Neighbourhood Plan, 25% of the Community Infrastructure Levy (CIL) generated from the development would be retained and spent within the local area.

³ The Economic Footprint of House Building in England and Wales - Home Builders Federation

9.0 PLANNING POLICY CONTEXT

9.1 This section provides/sets out the relevant planning policy context for the proposed development at national and local levels, and, pursuant to the section 38 (6), Planning Compulsory Purchase Act 2004, considers the statutory development plan policies, as well as other material considerations which are relevant to the site.

i. Development Plan

9.2 The Site lies within the administrative area of HDC. Therefore, the statutory development plan comprises the following:

- Horsham District Planning Framework (adopted in November 2015);
- Shaping Development in Horsham District (endorsed by Cabinet September 2025)
- The Horsham Blueprint Business Neighbourhood Plan (December 2022) (HBNP); and
- West Sussex Waste Local Plan (adopted in April 2014, and confirmed as up to date in 2024).

HDC Planning Framework (adopted in November 2015)

9.3 The statutory development plan for Horsham is the Horsham District Planning Framework (HDPF, 2015), being the main planning document and sets out the spatial strategy for the District. This Plan remains statutory as the emerging Local Plan has not yet been adopted to formally supersede it.

9.4 Whilst the HDPF covers the plan period until 2031, it is now over 10 years old, is overdue a review, and therefore, some of the local policies are not up-to-date nor in line with current national policy. In particular, this relates to Policy 15 'Housing Provision' which sets the housing target for the Plan period. The latest Housing Delivery Test was published on 12 December 2024 and shows that HDC has only delivered 62% of its housing requirement between 2020-21 and 2022-23. As a

result, of HDC being unable to demonstrate a five year housing land supply and a poor housing delivery rate against the Housing Delivery Test, the presumption in favour of sustainable residential development ('tilted balance') is engaged. Therefore, whilst significant weight is applied to the HDPF (2015), limited weight should be applied to its strategic and restrictive locational policies.

9.5 The HDPF defines Built-Up Area Boundaries (BUAB) and Policy 4 relates to Settlement Expansion, which resists significant residential development outside of the BUAB, while Policy 26 (Countryside Protection policy) also resists development in the countryside.

9.6 Adopted policies which restrict housing development outside of settlement boundaries may be considered out of date as the Council is currently unable to demonstrate a 5-year housing land supply (the most recently quoted figure from the HDC December 2025 Annual Monitoring Review is 1.7 year supply).

9.7 Policies within the Horsham District Local Plan 2015 of particular relevance to this proposal include:

- 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 27 - Strategic Policy: Settlement Coalescence
- Policy 30 - Protected Landscapes
- 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 39 - Strategic Policy: Infrastructure Provision
- Policy 40 - Sustainable Transport
- Policy 41 Parking
- Policy 42 - Strategic Policy: Inclusive Communities

Horsham District Local Plan 2023 – 2040 and Emerging Evidence Base

- 9.8 HDC have been preparing a new Horsham District Local Plan 2023 – 2040 (HDLP) which will set out planning policies and proposals to guide development in the District up to 2040.
- 9.9 In July 2024, HDC formally submitted the ‘Horsham District Local Plan 2023 – 2040 Regulation 19’ document (dated January 2024) and supporting documents and evidence base to the Planning Inspectorate for Examination, which included a settlement site allocation for the Site. Strategic Policy HA10: Horsham Housing Allocations requires “*the provision of at least 400 homes*” from the two identified Horsham sites with Proposed Allocation HOR1: ‘Land at Hornbrook Farm’) allocated for a comprehensive housing development to deliver at least 100 new homes to be delivered in the Plan period (up to 2040), with at least 300 homes to be delivered on HOR2: ‘Land at Mercer Road’.
- 9.10 The Examination hearings commenced in December 2024, however, early into the process, the Inspector cancelled the remaining sessions and issued an Interim Findings Report recommending that HDC withdraw the Plan entirely. The Inspector raised significant concerns that HDC had failed to meet the legal “duty to cooperate” with neighbouring authorities and issues with HDC’s water neutrality strategy. HDC

strongly disagreed with the Inspector's recommendation and made representations to seek the reopening of the examinations.

9.11 Paragraph 49 of the NPPF (2024) states that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

9.12 However, since the Examination was paused, the Government confirmed on 27 November 2025 that the statutory duty to cooperate (Section 33A of the 2004 Act) is to be abolished and Natural England has also withdrawn its Position Statement, relating to water neutrality. As a result of these material changes in circumstance the Examination is able to proceed once again.

9.13 A new Inspector has been appointed and recommended the Horsham District Local Plan 2023 – 2040 be examined afresh with two stages of hearings recently proposed. The first stage in late April will look at topics such as housing need, affordable housing, the present housing supply and trajectory. The later set of hearings will likely be held in late September 2026 and address spatial strategy, maintaining a rolling housing supply and site allocations, amongst other matters.

9.14 Therefore, although the positive news is that the Local Plan examination is to be restarted, only limited weight can currently be applied to the policies set out in the Horsham District Local Plan 2023 – 2040 Regulation 19 document, given the stage of examination at the present stage.

9.15 However, the Applicant considers that certain elements of the evidence base prepared in support of the Horsham District Local Plan 2023 – 2040, particularly those demonstrating need, constitute material planning considerations in the determination process. HDC has already proposed modifications as a result of the Regulation 19 consultation process. Where relevant, these elements are referenced throughout this Planning Statement and the accompanying submission documents.

Shaping Development in Horsham District Planning Advice Note (SDPAN) (September 2025)

9.16 Following the delays in the Local Plan examination the Council published an updated document to provide guidance on how development sites can come forward during this policy vacuum. The document sets out the Council's aspirations and the weight that can be given to current policy within the context of current legislation, national policy and guidance. The Advice Note updates and supersedes the October 2022 Facilitating Appropriate Development (FAD) document.

9.17 It is a material consideration in planning applications and has confirmed the site remains identified for development within the emerging Local Plan. Paragraph 5.7 of the SDPAN confirms that:

"It is the Council's view that the proposed site allocations are based on robust evidence, most notably site assessment work and were capable of accommodating sustainable development. For this reason, the Council will consider positively proposals on sites identified in the eLP, which accord with such evidence and are in accordance with (non-housing supply) HDPF or Neighbourhood Plan policies."

9.18 The Site remains one such proposed site allocation under Policy HOR1: Horsham. While no specific issues were raised by the emerging Local Plan Inspector with the proposed allocations, there was expressed concern about whether the overall quantity of planned housing was sufficiently high to meet the district's identified need.

9.19 The SDPAN sets out an interim position for how HDC will approach policy matters, which have developed at the national level subsequent to the adoption of the current Local Plan, such as the Environment Act. It therefore, provides an indication for how HDC will apply policies and weight to adopted policy documents (namely not the document itself) and has been considered in this Planning Statement.

The Horsham Blueprint Business Neighbourhood Plan (December 2022) (HBNP)

9.20 Forming part of the development plan for this area of the district, the HBNP is less than 5 years old and carries material weight in planning decisions. Whilst it does not allocate sites for development, it contains policies with the objective of ensuring that any development in its area meets the needs of local people.

9.21 Policies within the Neighbourhood Plan of particular relevance to this proposal include:

- Policy HB1 - Location of Development
- Policy HB2 - Meeting Local Housing Needs
- Policy HB3 - Character of Development
- Policy HB4 - Design of Development
- Policy HB5 - Energy Efficiency and Design
- Policy HB10 - Green and Blue Infrastructure and Delivering BNG
- Policy HB12 - Encouraging Sustainable Movement
- Policy HB14 – Community and Cultural Facilities

West Sussex Waste Local Plan (adopted 2014, confirmed up to date 2024)

9.22 WSCC worked in partnership with the South Downs National Park Authority to produce the West Sussex Waste Local Plan. Formally adopted by both authorities in April 2014, the plan covers the period to 2031. The Waste Local Plan was subject to a 5-year review in 2019, as required by national policy. The outcome of the review undertaken in 2024 was that the plan remains relevant and effective; therefore no update is required at this time.

9.23 Other documents that are material considerations during the determination of planning applications include:

- Planning Obligations and Affordable Housing Supplementary Planning Document (2017)
- Community Infrastructure Levy (CIL) Charging Schedule (2017)
- Supplementary Planning Guidance (September 2020) - revised county parking standards and transport contributions methodology
- Air Quality and Emissions Mitigation Guidance for Sussex (2020)
- Planning Advice Note: Biodiversity and Green infrastructure (2022) Noting that national BNG requirements are now in force.

ii. National Planning Policy Framework 2024 (NPPF)

9.24 The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied through the planning system.

9.25 Paragraph 2 confirms that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise and the NPPF is a material consideration in planning decisions. This accords with the statutory test pursuant to section 38 (6) of the Planning and Compulsory Purchase Act 2004.

9.26 At the heart of the NPPF is a presumption in favour of sustainable development that should run through both place-making and decision-taking. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development on the basis of the following:

- Approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:

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

9.27 Footnote 8 defines out-of-date development plans as situations where the local planning authority cannot demonstrate a five year housing land supply, or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

9.28 Chapter 5 (Delivering a sufficient supply of homes) at para 61 onwards, sets out the Government's objective of significantly boosting the supply of homes and that it is important that a sufficient amount and variety of land comes forward where it is needed, which addresses specific housing requirements.

10.0 PLANNING ASSESSMENT

10.1 The determination of this planning application is based upon the assessment of two distinct areas; the principle of development and the details of the scheme. We set out below our assessment of both of these areas with reference to the Development Plan, the emerging Local Plan, and the National Planning Policy Framework (the Framework).

10.2 The primary requirement of the Framework is to secure sustainable development, and this material consideration should be considered when determining development proposals. To do this, the Framework requires:

- Plans to be up-to-date and to meet the full objectively assessed housing needs of an area
- Plans and decisions to deliver the three aspects of sustainable development – economic, social and environmental
- Plans and decisions to take local circumstances into account so that appropriate responses are provided in differing locations.

10.3 Paragraph 11d of the Framework states that *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 strong reason for refusing the development proposed; or*
- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination .*

PRINCIPLE OF DEVELOPMENT

- 10.4 As set out in Chapter 9 of this planning statement, the Council's latest Annual Monitoring Report confirms that it has a shortfall in its 5-year housing land supply (1.7 years' supply) and, as a consequence of paragraph 11 of the Framework the Council's policies relating to the supply of housing are considered to be out of date. These policies include HDPF Policy 1 (Sustainable Development), Policy 2 (Strategic Development), Policy 3 (Development Hierarchy), Policy 4 (Settlement Expansion) and Policy 26 (Countryside Protection), which set out the settlement hierarchy of the district and establish the Council's main strategy for the location of development across the district. HB1 (Location of Development) of the HBNP is also of relevance.
- 10.5 HDPF Policy 1 (Sustainable Development) confirms that 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.
- 10.6 The site has been considered in detail by the Council for a number of years as being suitable for residential development forming an extension to Horsham town. The site forms a draft allocation within the submission Horsham District Local Plan 2023 - 2040 (emerging Local Plan) under Strategic Policy HA10 (HOR1). This policy outlines the site for the development of at least 100 homes and requires proposals to achieve the following:
- a) Have appropriate regard to the setting of the High Weald Area of Outstanding Natural Beauty (AONB) and the Grade II Listed Falcon Lodge Hillier Cottage;

- b) Undertake a Landscape and Visual Impact Assessment to inform site layout, capacity and identify and safeguard key views to and from the High Weald AONB;
- c) Provide safe pedestrian and cycling crossing points over the A281 (Brighton Road) from the site;
- d) Create an extended Riverside Walk along Horn Brook;
- e) Take advantage of opportunities to improve pedestrian connectivity and active travel in the area, including to Public Rights of Way north of the site; and
- f) Seek to protect and maintain existing hedgerows and mature trees.

10.7 The proposed development seeks up to 180 dwellings in line with draft Policy HA10 (HOR1) and is therefore considered principally to be in accordance with Policy HA10, which carries weight in favour of the proposal. Full accordance with the criteria of Policy HA10 (HOR1) is assessed below under the appropriate sections in this Statement.

10.8 The site accords with the policies set out in the adopted local plan as a whole and the NPPF. The site offers a suitable location given Horsham's position in the settlement hierarchy, it is available now and the scheme is viable and deliverable.

10.9 In light of the Council's inability to demonstrate a 5-year supply of deliverable housing sites, and in recognition of the key objective of Government policy to significantly boost the supply of homes, the Council has endorsed a Shaping Development in Horsham Planning Advice Note (SDPAN-2025). This guidance note clarifies the adopted policy position and confirms that the principle of residential development is acceptable on this site.

10.10 The SDPAN, at Paragraphs 5.6 - 5.9, advises that emerging Local Plan draft allocations seek to meet identified housing needs in the period to 2031 together with housing requirements to 2040 and therefore seeks to go beyond allocations in a number of made and emerging Neighbourhood Plans.

10.11 The SDPAN at paragraph 5.7 further advises that emerging Local Plan draft allocations are based on robust evidence that sites are capable of accommodating sustainable development. The Council will therefore consider positively applications for development identified emerging Local Plan, and which are also compliant with non-housing supply related Policies.

10.12 The SDPAN additionally sets out the weight that can be given to current and emerging local policy and has been produced to enable the Council to act proactively to continue to deliver housing in a sustainable manner. For development proposals located outside the defined built up area boundary (BUAB), the SDPAN (at paragraph 5.12) echoes the requirements of HDPF Policy 4 and states that applications will be considered positively provided that all of the following criteria are met:

1. The site adjoins the existing settlement edge as defined by the BUAB;
2. The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
3. The proposal demonstrates that it meets local housing 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; and
5. The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.

10.13 The site abuts Horsham's BUAB to the north and west and is contained within a defensible boundary marked by Horn Brook to the north and west, Brighton Road to the south and Doomsday Lane to the east. The proposal is additionally considered to meet local housing need, and would not prejudice comprehensive long-term development. The development is therefore considered to meet criteria 1, 3, 4 and 5 set out above.

10.14 Accordance with Criterion 2, Horsham is identified as the Main Town within the district's settlement hierarchy, under Policy 3. It benefits from a large range of

employment services and facilities and leisure opportunities, including those providing a district function, as well as strong social networks, with good rail and bus accessibility. The proposed level of expansion is appropriate to the scale and function of the settlement and the development is therefore considered to meet Criterion 2.

SUSTAINABLE DEVELOPMENT – ECONOMIC, SOCIAL AND ENVIRONMENTAL BENEFITS

Economic Benefits

10.15 The development could deliver meaningful economic growth to the local area through both the construction and operational phases. Significant job creation is expected during the construction of up to 180 homes, which could support the employment of around 625 people, including 7 apprentices, graduates or trainees⁴. Once occupied, the increased local population could provide vital support for local and town centre services and facilities, enhancing the vitality of Horsham through increased local spending. Furthermore, the project could generate around £4,800,000 in tax revenue, including around £362,000 in Council Tax receipts⁵ and 25% of the Community Infrastructure Levy (CIL) receipts would be specifically directed to the local community.

Social Benefits

10.16 A primary social benefit of the proposal is the delivery of up to 180 high-quality new homes, including a policy-compliant 35% affordable housing provision (up to 63 units) to meet acute local housing needs. The scheme offers a balanced community mix with various house types and sizes, including bungalows, in accordance with Policy 42 of the HDLP, which seeks to provide for inclusive communities.

10.17 Nearly half of the site (4.31 hectares) is dedicated to public open space, providing extensive recreational facilities such as a central children's play area (LEAP), "Play On The Way" features, trim trails, and a new riverside walk along Horn Brook. These

⁴ The Economic Footprint of House Building in England and Wales - Home Builders Federation

⁵ The Economic Footprint of House Building in England and Wales - Home Builders Federation

features are designed to promote physical activity, social interaction, and mental wellbeing for both new and existing residents.

Environmental Benefits

10.18 The Illustrative Masterplan adopts a landscape-led approach that prioritises the retention and enhancement of the site's existing natural assets, including mature trees and hedgerows. The development will achieve a Biodiversity Net Gain in excess of 10%, with significant enhancements to linear habitats like hedgerows and watercourse habitats.

10.19 To preserve the setting of the High Weald National Landscape, the creation of a substantial area of public open space in the south eastern corner of the Site is proposed. This is set back from Doomsday Lane by up to 115m and connects to a green corridor running along the eastern boundary. The new planting will incorporate species-rich grassland and native woodland planting. Environmental sustainability is further integrated through innovative Sustainable Drainage Systems (SuDS), such as swales that create new wildlife habitats while managing flood risk.

FIVE YEAR HOUSING LAND SUPPLY POSITION – TILTED BALANCE

10.20 The Council is currently unable to demonstrate a five year supply of housing with the most recent monitoring showing only a 1.7-year supply (AMR, December 2025). Furthermore, the Housing Delivery Test indicates that only 62% of the required housing has been delivered over the past three years. The process through which a viable replacement plan could have been adopted has stalled for over a year now through the Local Plan Examination process and, as submitted, the emerging Local Plan did not propose sufficient housing allocations to meet objectively assessed housing need. Although a revised timetable has now been agreed by the new appointed Inspector, and the Council is currently reviewing housing allocations with a view to, *inter alia*, increasing residential density across the proposed allocation sites, there remains no realistic or imminent prospect that the current shortfall will be remedied through the development plan process.

10.21 This means the relevant policies, particularly current settlement boundaries, are to be considered out-of-date and the tilted balance in HDPF Policy 1 and NPPF paragraph 11d) is engaged. This means that planning permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits.

10.22 Having concluded that the settlement boundaries in the HDPF are out of date, it follows that the same boundaries within the HBNP must also be out-of-date. The proposed development is brought forward at a time when HDC cannot demonstrate a five-year housing land supply, and the site's suitability is further reinforced by its status as a draft allocation (Policy HOR1) in the emerging Local Plan, an allocation supported by the Council's "Shaping Development in Horsham District" guidance.

10.23 To summarise the position on the principle of development: the Council is unable to demonstrate a 5-year housing land supply and as the Local Plan policies that restrict housing development are out of date the tilted balance applies. The site is draft allocated within the emerging Local Plan at Policy HA10 (HOR1) which seeks to meet housing demand up to 2040; and the proposal is considered compliant with the SDPAN when considered both in isolation and cumulatively. The proposals constitute sustainable development, providing economic, social and environmental benefits for the local community. There are no adverse impacts that would significantly and demonstrably outweigh the benefits of the scheme and the proposals are therefore considered to be acceptable in principle.

QUANTUM OF DEVELOPMENT AND NET DEVELOPABLE AREA

10.24 The scheme proposes the provision of up to 180 new homes which will meet local needs on a site directly adjacent to the existing settlement boundary of Horsham. This figure was reduced from an initial proposal of 190 dwellings during the pre-application process to better address the site's landscape sensitivities and respond to feedback from Council officers and local residents through the public consultation process.

10.25 Policy 15 (Housing Provision), though considered out of date, seeks to provide an average of 800 homes per annum, a target which has been achieved only three times since 2015/16 and has resulted in a significant shortfall in housing delivery over the past ten years. Whilst the site is identified in the emerging Local Plan (Policy HOR1) for at least 100 homes, the current proposal represents a more efficient use of the 4.83-hectare developable area and follows detailed technical site assessment. The Parameter Plan submitted for approval shows how the parcels of land have developed from a landscape-led approach that sensitively responds to the character of the wider area in the context of this proposal being an extension to Horsham.

10.26 The scheme achieves an average net density of 37 dwellings per hectare (dph), but maintains a significantly lower gross density of 20 dph when measured across the total 9.23-hectare site area. This quantum ensures that nearly half of the site can be dedicated to public open space and green infrastructure, and the incorporation of single storey (bungalow) development provides a sensitive and low-density transition between the new built form and the High Weald National Landscape.

10.27 The Illustrative Masterplan demonstrates that the proposed quantum of development can be comfortably accommodated within the site, in line with Policy 32 (the Quality of New development) and Policy 33 (Development Principles). The proposal seeks to maximise the efficient and effective use of land in line with Criterion 1 of Policy 33, as is strongly supported by the NPPF, specifically paragraph 11d(ii) and paragraphs 124-130.

BUILDING HEIGHTS

10.28 A Landscape Visual Impact Assessment (LVIA) has been completed to inform not just the Parameter Plan but also to focus development heights and set out a development strategy for the site with a further Building Heights Parameter Plan submitted; creating a landscaped transition between the new development, open

space and High Weald National Landscape beyond. This sets a development strategy for future Reserved Matters submissions.

10.29 The proposed development will feature building heights of primarily two storeys, aligning with the prevailing scale and character of the adjacent residential areas in Horsham. A key component of the strategy is the inclusion of bungalows along the eastern and south-eastern boundaries around the public open space to create a gentle, sensitive transition between the new built form and the countryside. These bungalows are strategically positioned away from the site's highest point (65m AOD) to minimise their visibility and ensure they sit comfortably fronting the proposed parkland setting.

10.30 In the central and northern parts of the site, where the topography slopes downward, there is scope for the selective use of 2.5-storey homes. This variation in height is intended to create an interesting and varied roofscape while optimising building heights in less sensitive areas without impacting the amenity of existing neighbours or compromising the site's rural edges. Council officers have supported this approach as a starting point, recommending that final designs incorporate traditional features such as hipped roofs and chimneys to provide further visual interest.

10.31 The Parameter Plan has been developed in accordance with Policy 33 (criterion 3) and Policies HB3 and HB4 of the HBNP to ensure that the scale and massing of the development will support a high standard of design and layout and relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site.

LANDSCAPE IMPACT

10.32 Policy 25 (The Natural Environment and Landscape Character) of the HDLP states that the Council will support development proposals which protects, conserves and enhances the landscape character, considering areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation. Policy 27 (Settlement Coalescence) states that landscapes

will be protected from development which would result in the coalescence of settlements.

10.33 Policy 30 (Protected Landscapes) states that the natural beauty and public enjoyment of the High Weald AONB (now National Landscape) will be conserved and enhanced and opportunities for the understanding and enjoyment of their special qualities will be promoted. Development proposals will be supported in or close to protected landscapes where it can be demonstrated that there will be no adverse impacts to the natural beauty and public enjoyment of these landscapes as well as any relevant cross boundary linkages.

10.34 Specifically, proposals should have regard to any management plans for these areas and must demonstrate:

- a) How the key landscape features or components of natural beauty will be conserved and enhanced. This includes maintaining local distinctiveness, sense of place and setting of the protected landscapes, and if necessary providing mitigation or compensation measures.
- b) How the public enjoyment of these landscapes will be retained.
- c) How the proposal supports the economy of the protected landscape and will contribute to the social wellbeing of the population who live and work in these areas.

10.35 In the case of major development proposals in or adjoining protected areas, applicants will also be required to demonstrate why the proposal is in the public interest and what alternatives to the scheme have been considered.

10.36 The application site does not lie within the National Landscape, however, the edge of the (High Weald) National Landscape forms a strong wooded backdrop to the town, and runs directly up to the built edge of Horsham. The designation also runs along the edge of Doomsday Lane, to the eastern edge of the site. The submitted Landscape and Visual Impact Assessment (LVIA) confirms that the site lies outside the High Weald National Landscape and, as such, there would be no direct effects on the designated landscape itself.

- 10.37 The site occupies a well-contained parcel at the edge of Horsham, enclosed by existing residential development to the north and west, commercial uses along Brighton Road to the south, and the wooded edge of St Leonards Forest to the east. This containment, together with the site's landform falling towards Horn Brook, reinforces its functional and visual relationship with the settlement rather than the wider countryside or National Landscape.
- 10.38 While development would result in a localised and noticeable change to the site itself, the LVIA concludes that effects on the wider landscape, including the setting of the National Landscape, would be limited and moderate in the short term, reducing to moderate to slight adverse in the long term as planting and landscape mitigation establish and the scheme becomes assimilated within its contained context.
- 10.39 In visual terms, effects are similarly localised, with the greatest impacts experienced by receptors close to the site. Importantly, the LVIA identifies no views from publicly accessible areas within the High Weald National Landscape towards the proposed development.
- 10.40 The assessment acknowledges that there would be some minor harm to the setting of the National Landscape, arising from the extension of built form and associated lighting at the settlement edge. However, this is tempered by the existing influence of development along Brighton Road and the site's contained urban fringe characteristics.
- 10.41 Crucially, the proposed landscape strategy, particularly the parkland and woodland enhancements along the Site's eastern edge, has been designed to reflect the character of St Leonards Forest and respond positively to the High Weald National Landscape Management Plan. This approach will strengthen the landscape framework and further integrate the development over time.

- 10.42 Overall, the LVIA concludes that the proposal would not give rise to unacceptable harm to the High Weald National Landscape or its setting, with effects being limited, localised, and capable of mitigation through design and landscaping.
- 10.43 In accordance with Policy 25 and Policy 27, the proposals would protect landscape character and would not result in the coalescence of settlements. In accordance with Policy 30, the setting of the National Landscape will be conserved, through the design and layout measures set out above, including the creation of parkland open space adjacent to the NL boundary and the transitioning of building heights from east to west within the development, as defined on the Parameter Plan.
- 10.44 The public enjoyment of the NL will be retained, by ensuring that its setting is respected, which, in turn, supports the economy of the protected landscape and will contribute to the social wellbeing of the population – both new and existing.
- 10.45 This is a major development proposal which is coming forward on a proposed housing allocation site within the emerging Local Plan. The provision of much-needed housing is clearly in the public interest and, as a housing allocation that has advanced through the Local Plan section process, a full range of alternatives to the scheme have been considered, in line with Policy 30.

AMOUNT OF AFFORDABLE HOUSING

- 10.46 Policy 16 (Meeting Local Needs) states that 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 (SHMA) in order to create sustainable and balanced communities. The policy notes that 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. As part of this, on sites providing 15 or more dwellings, or on sites over 0.5 hectares, the Council will require 35% of dwellings to be affordable.
- 10.47 The exact housing mix will be agreed at Reserved Matters stage, however, an Illustrative Masterplan accompanies the planning application and includes a mix

that has been designed in consideration of the recommendations for Horsham set out in the SHMA, 2019, in accordance with Policy 16.

10.48 The proposed development will deliver a policy-compliant provision of 35% affordable housing, which equates to up to 63 high-quality new units. In accordance with the HDPF, the intended tenure split is 70% affordable rented and 30% intermediate tenure. The specific housing mix will be designed to address acute local needs identified in the Forest Ward and the wider District, with a particular focus on 3-bed family dwellings, as well as 1 and 2-bed units. To accommodate the needs of an aging population and those with disabilities, the scheme will include a proportion of M4(2) and M4(3) accessible and wheelchair-adaptable dwellings.

10.49 These affordable homes will be integrated throughout the site and designed to be tenure-blind, ensuring they are architecturally indistinguishable from market housing, in accordance with Policy HB2 of the HBNP. This significant contribution comes at a critical time when the Council can only demonstrate a 1.7-year housing land supply, thereby directly addressing the severe shortfall in affordable housing delivery within the District.

ACCESS, TRANSPORT AND HIGHWAYS

10.50 The application is submitted in Outline form, but includes Means of Access as a matter for consideration at this stage. The application is supported by a Transport Assessment, Travel Plan and Safe Routes to School Assessment which considers in detail the transport implications of the proposals.

10.51 A new vehicular access is proposed as a simple priority junction on the A281 Brighton Road. The Proposed Access Arrangement Plan DR/C/SK001 Rev H clearly identifies the new vehicular access road, which is sought in detail as part of this submission and is approximately halfway between the junction of Doomsday Lane and the entrance to Hilliers Hornbrook Nurseries.

- 10.52 A dedicated and separate pedestrian access point is proposed more centrally to the site but again to access onto Brighton Road. This will serve the entire scheme and connect directly to the central north-south spine of recreation routes providing maximum connectivity to the entire site. The main road footway is present on the southern side of the A281 opposite the site frontage extending into Horsham to the west and to Mannings Heath (and beyond) to the southeast; a crossing point is therefore required. Pedestrian crossing facilities are proposed in the form of a signalised 2m wide crossing, with the design according with the Design Manual for Roads and Bridges (DMRB) standards.
- 10.53 An independent Stage 1 Road Safety Audit has been undertaken (October 2025) which raised matters including pedestrian desire routes, vehicle speeds, and side road visibility which have been fully addressed in the Designer's Response.
- 10.54 The TRICS database has been used to estimate the likely vehicular trip generation for the development proposals based on multi-modal surveys in the houses privately owned category. Subsequent traffic modelling of the local road has been undertaken for the future weekday AM and PM peak hours which indicates that the assessed junctions (including the site access) would remain within capacity, allowing for projected background traffic growth.
- 10.55 A number of opportunities exist for sustainable means of travel to local amenities/services on foot or by cycle, with parts of the town centre being within 2.0km of the development and public transport options also available. Given the poor accessibility of the existing eastbound bus stop opposite the Hornbrook pub, it is proposed that it is relocated along the site frontage to connect directly to the new proposed pedestrian site entrance.
- 10.56 The proposed scheme accords with Policy 40 (Sustainable Transport) and HB12 of the HBNP, which promote an improved and integrated transport network by bringing forward new homes on an appropriately located site, that is well connected in terms of local shops and services and well connected to public transport. The development will enhance pedestrian and cycle links for the area, and will provide

appropriate on-site parking, in accordance with Policy 41 (Parking), which will be detailed at Reserved Matters stage.

10.57 Further options for site access were considered at the various pre-application submissions and discussed with both HDC and WSCC Officers. One such proposal was for a separate vehicle access off Doomsday Lane, roughly in the location of one of the existing field entrances. However, the lack of pedestrian footway along this lane, the speed of cars using the road and the poor visibility made this option unsafe and therefore discounted. There is however, the possibility of an emergency vehicle access point here to enter only the site to aid quicker response times to this eastern part of the site. This is shown indicatively on the Illustrative Masterplan.

10.58 Studies have been carried out looking at options for pedestrians, particularly parents and children to get to school. Assessments of Walked Routes to School have been carried out for both Heron Way Primary School and The Forest School showing both are within comfortable, recommended walking distances for primary and secondary school-aged children, respectively, and found safe with the proposed controlled crossing point submitted with this application. The site is therefore considered a sustainable location in terms of existing alternative transport infrastructure.

10.59 A pedestrian route between the north-eastern boundary of the application site onto Doomsday Lane / to the PRow network to the north was suggested and the applicant's professional team including highways / drainage / utility engineers and the project ecologist undertook a thorough feasibility review.

10.60 The in depth technical assessment concluded that the prospect of pedestrian connectivity from the north-eastern boundary to the PRow network to the north is unviable, having encountered several major constraints including but not limited to:

- An existing strategic trunk water main (with 6m easement), located along the entire eastern boundary of the application site, for which Southern Water will

not agree a diversion, due to the strategic nature of the infrastructure and the risks associated with the asset;

- Unacceptable ecological harm – the woodland and Horn Brook provide the highest distinctiveness habitats within the site and the removal of trees and vegetation in this location would break the commuting route for a range of wildlife [REDACTED]. The works required to create a formal pedestrian access in this location would result in significant urbanisation of this area, resulting in the degradation of the priority habitat through increased disturbance and unacceptable impacts on the existing habitat.

10.61 An Interim Residential Travel Plan has been provided in support of the application and would be secured through a planning condition to minimise private car use. The proposals are considered to be acceptable in transport terms and to accord with Policies 40 and 41 of the Local Plan.

FLOOD RISK AND DRAINAGE

10.62 Policy 38 (Flooding) of the HDLP requires development proposals to follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. Policy 35 of the HDLP relates to climate change and encourages the use of green infrastructure and dual use SuDS to enable development to adapt to the impacts of climate change.

10.63 The application is supported by a Flood Risk Assessment, which includes an outline surface water drainage strategy. The northern and western boundaries of the site are in Flood Zone 3, however, all dwellings will be sited outside the flood zone, such that they are wholly in Flood Zone 1 (Low Probability) which means it is defined as land having less than a 1:1000 annual probability of fluvial flooding. The site is therefore located within Flood Zone 1 and therefore in accordance with the NPPF and NPPG the sequential test is not required for this site.

10.64 The proposed development will manage surface water run-off attenuation and conveyance using a combination of attenuation structures, piped networks and SuDS features including, rain gardens, rainwater harvesting, swales, detention basin(s), permeable paving, and other SuDS features. The submitted surface water drainage strategy demonstrates that the Parameter Plan showing each parcel of developed land can be satisfactorily drained and any surface water managed for the lifetime of the development.

10.65 The design of surface water systems to accord with local and national guidance needs to consider the LLFA guidance which is published by WSCC. Measures to accommodate overland flows from the site will need to be considered as part of the development process at the detailed design stage and submitted as part of the Reserved Matters application.

10.66 As the proposed development will be built in Flood Zone 1 it is unlikely to experience fluvial or tidal flooding, therefore the users will remain safe throughout the lifetime of the development. Similarly due to the built development being within Flood Zone 1 the exception test is not relevant to these proposals for “More vulnerable” development. The proposals will be subject to further detailed design and following advice from WSCC as the Lead Local Flood Authority the development proposals accord with national policy and guidance and with Local Plan Policies 35 and 38.

FOUL DRAINAGE

10.67 It is the intention that the development will connect to the public foul sewerage network, which complies with the foul drainage hierarchy that prioritises connection to the public sewer system. Through discussions with Southern Water, initial concerns have been raised as to the off-site capacity to accept flows from this development at the preferred point of connection located at the junction of Kerves Lane/Brighton Road to the west of the application site.

10.68 However, it is not considered that this prejudices the grant of planning permission as ultimately there is a separate and parallel statutory regime through the Water

Industry Act 1991 that places a statutory duty on water authorities to provide necessary infrastructure and any temporary implications arising would not justify withholding delivery of housing development in a situation where there is such an acute need.

ECOLOGY AND BIODIVERSITY NET GAIN

10.69 Policy 25 (The Natural Environment and Landscape Character) states that the Council will support development which maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible. This requirement is also reflected in Policy HB10 of the HBNP.

10.70 Policy 31 (Green Infrastructure and Biodiversity) states that the Council will support new development which retains and/or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.

10.71 A Preliminary Ecological Appraisal has been undertaken to identify any ecological constraints and, where appropriate, address measures to avoid or reduce any adverse impact of the proposed development on protected and/or notable species and habitats. Further investigations and extensive species-specific surveys have been undertaken, which have fed into an Ecological Impact Assessment which identifies the features of ecological importance (including legally protected sites and species), specifies mitigation requirements for the proposal, and supports the implementation of national biodiversity strategies and national planning policies for the preservation of biodiversity whilst enabling sustainable development.

10.72 The proposal does not present significant ecological impacts; however, consideration is to be given to the preservation of hedgerows where practical and

mature trees on the Site, and in order to improve the value of the site for wildlife, bird, invertebrate and bat boxes should be installed within suitable habitats throughout the development.

10.73 The application is accompanied by a Baseline Habitat Condition Assessment and post development assessment of Biodiversity Net Gain (BNG) in accordance with the relevant DEFRA BNG metrics and assessment procedures and in accordance with HDC's Biodiversity and Green Infrastructure Planning Advice Note (endorsed at Full Council on 19 October 2022). The application is supported by a Biodiversity Net Gain Report, which demonstrates that the development would achieve biodiversity net gain in excess of national requirements of 10%.

10.74 Specifically, Area-Based Habitat Units would achieve 10.9% net gain, of which Linear-Based Habitats achieved through hedgerow enhancements would achieve 25.15% net gain. Further gains have been identified with the addition of 0.35 watercourse units which is equivalent to a net gain of 15%. As such, the proposed development is compliant with current legislation (Environment Act 2021) and the NPPF as a minimum biodiversity net gain of >+10% will be achieved for both area-based and linear-based habitat units.

10.75 Following Natural England's withdrawal statement, issued in October 2025, and in the context of the water efficiency savings made by Southern Water, all development is now able to move forward as water neutral. The development would target a maximum of 110L/person/day (including 5L/person/day for external water use. This would relate to the Building Regulations Part G 'Optional' requirement of 110L/person/day, as required by Policy 37 of the HDPF, and is considered to be Water Neutral, in line with Policy HB14 of the HBNP.

10.76 The protection and enhancement of the site in ecological terms fully accords with the requirements of Policy 25 and Policy 31.

ARBORICULTURAL

- 10.77 An Arboricultural Impact Assessment for the development has been undertaken and the baseline tree survey identified that there were 57 individual trees, ten hedgerows, six groups and one woodland in and adjacent to the proposed development site. Of the trees surveyed, 15 individuals and one woodland were attributed category A status; 19 individuals, five hedgerows and six groups were attributed category B status.
- 10.78 Working within the submitted Parameter Plan, some trees were identified for removal. Of those trees to be removed, seven individual trees and one partial hedgerow was attributed category C status. Three partial hedgerows were attributed category B status. A further two individuals were attributed category U status.
- 10.79 The Illustrative Masterplan clearly demonstrates that the highest quality trees and hedgerows could all be retained and that all of the retained trees and hedgerows can be incorporated into a housing scheme on this site, which would help form the parcels of land and the network of interconnecting green corridors. The Landscape Strategy Plan builds on this principle further strengthening the existing stock with additional planting.
- 10.80 Policy 31 requires mitigation for loss of existing green infrastructure and enhancement of biodiversity. It seeks the creation of green spaces and linkages between habitats ensuring that loss of trees require replacement. Although currently in Outline form, the submitted Landscape Strategy Plan demonstrates how appropriate planting and landscaping can be delivered, including an extensive and biodiverse green space in the south eastern part of the site and green linkages throughout the site, connecting a series of local green spaces within the development, utilising the existing trees within the site.
- 10.81 The proposed landscaping scheme, to be approved at Reserved Matters stage, will include extensive additional tree planting, while the retained trees will be protected,

maintaining significant mature landscaping within the scheme, in accordance with Policy 31.

- 10.82 Neighbourhood Plan Policy HB10 similarly seeks to create, conserve, enhance and manage such assets. It is clear the proposals represent a significant enhancement of green infrastructure through the retention and protection of quality trees together with presenting new opportunities for environmental improvements thereby being in accordance with local plan policies regarding green infrastructure.

ARCHAEOLOGY AND HERITAGE

- 10.83 The application is supported by a Cultural Heritage Assessment in which heritage potential has been assessed for both below ground interest related to archaeology and also above ground including Listed Buildings, Conservation Areas and other heritage assets.

- 10.84 Paragraph 207 of the NPPF states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset. Policy 34 (Cultural and Heritage Assets) states that the Council recognises that heritage assets are an irreplaceable resource, and as such the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets. The policy requires that development should retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features and ensure appropriate archaeological research, investigation, recording and reporting of both above and below-ground archaeology, and retention where required, with any assessment provided as appropriate.

- 10.85 The site is not located in an area of designated archaeological priority. A geophysical survey was undertaken in February 2025 in order to further evaluate

the archaeological potential with no anomalies of certain archaeological origin being identified.

10.86 Overall, there is considered to be a low potential for all periods of archaeological activity. Any archaeological remains present within the study site would be considered of no more than of local significance.

10.87 The existing hedgerows within the study site boundary have been identified as potential historic hedgerows of local significance. Proposed impacts to such hedgerows are likely to be limited to the removal of short sections to facilitate access, the riverside walk and associated ground/drainage works.

10.88 In terms of the heritage potential of surrounding buildings, there are multiple Listed Buildings and a Scheduled Monument within the 1km study area adopted during the cultural heritage assessment. This includes the Grade II Listed Magpie House around 30m to the south of the Site. The potential development impacts associated with these designated assets has been assessed and it is considered that the development proposals will have either a neutral impact or no impact to the significance of these designated assets and their settings.

10.89 In terms of other designated heritage assets, no World Heritage Sites, Registered Park and Gardens, Historic Battlefields, Protected Wreck Sites, or Conservation Areas lie within the study site or the study area. The development proposals will not have an impact upon any Locally Listed or non-designated built heritage assets within the area.

10.90 In accordance with Policy 34, the proposals will retain the setting of heritage assets which in accordance with the policy includes views, public rights of ways, trees and landscape features. There has been ongoing correspondence between the WSCC Archaeology Unit and Heritage Consultant to agree that trial trenching can be conditioned thereby in accordance with national and local policy.

NOISE

10.91 Policy 24 (Environmental Protection) states that the high quality of the district's environment will be protected through the planning process and the provision of local guidance documents. Considering any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution.

10.92 A noise survey has been carried out to confirm noise levels at the site. Noise affecting the development has been assessed in accordance with relevant local and national planning guidance, including ProPG guidance.

10.93 The design of the development is considered to be acceptable subject to the adoption, where required, of acoustically upgraded glazing and ventilation and acoustic screening, where required, around gardens (such as the adoption of 1.8m high close-boarded timber fencing, especially towards the edges of the development areas). This can be investigated further at the detailed design stage and may be secured by the imposition of a noise related planning condition.

10.94 Compliance with noise criteria in Building Regulations Part O has also been assessed and some bedrooms will need to be designed so that windows can remain closed at night without the rooms overheating. This will be assessed further as part of future design development, ensuring compliance with Policy 24.

AIR QUALITY

10.95 Policy 24 assesses environmental protection and aims to minimise air pollution, including emissions, in order to protect human health and the environment and reduce the number of people exposed to poor air quality. For development proposals, this policy seeks to ensure a development's exposure to pollutants, including air pollution, is minimised and does not conflict with the Implementation of Air Quality Action Plans.

- 10.96 The air quality assessment was carried out regarding relevant local and national planning policy and guidance. The site is not located within or close to an Air Quality Management Area (AQMA), indicating that local air quality is generally acceptable. Pollutant concentrations in the vicinity are primarily influenced by vehicle emissions along the adjacent Brighton Road (A281) and the local road network.
- 10.97 The assessment finds that no significant impacts on local air quality as a result of development-generated traffic are anticipated and taking into account the predicted extent and magnitude of changes in NO₂, PM₁₀ and PM_{2.5} concentrations at relevant receptors,, the overall effect of the development is considered 'not significant' with regard to air quality.
- 10.98 A Damage Cost Calculation was also undertaken, at the request of the local authority, to identify the monetary value of the environmental 'damage' associated with the proposal and determine the amount of mitigation that is appropriate to offset this cost. The detail of the mitigation measures will be set out in detail at Reserved Matters stage and will include measures intended to encourage the transition to more sustainable transport options, which minimise future emissions over the lifetime of the development.
- 10.99 It is concluded that the site is suitable for the development in terms of air quality and that there are no air quality constraints with respect to planning consent. Subject to offsetting the identified 'damage' cost via a suitably worded condition the development complies with Policy 24 of the HDPF.

ENERGY & SUSTAINABILITY

- 10.100 The application is supported by an Energy and Sustainability Statement which sets out the key sustainable options suitable for the site to be incorporated into the design and construction of the dwellings. The scheme proposes to utilise Modern Methods of Construction and the fabric first approach to construction providing highly energy efficient homes which in turn provides low energy and water costs for residents.

- 10.101 HDPF Policy 33 (Development Principles) requires buildings and spaces to be orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with the character of the surrounding townscape, landscape or topography.
- 10.102 Additionally the HDPF includes three specific policies focused on climate change and sustainable construction. Policy 35 requires development to make a clear and demonstrable contribution to climate change mitigation and adaptation, consistent with the Council's carbon reduction objectives, by minimising energy use, improving efficiency, incorporating renewable and low-carbon technologies, promoting sustainable patterns of development and reducing waste, whilst also ensuring schemes are resilient to climate change impacts, particularly flood risk, water stress and landscape change, through measures such as SuDS, green infrastructure, water conservation and climate-responsive design, unless robustly justified otherwise.
- 10.103 Policies 36 and 37 collectively require development to follow the energy hierarchy, reducing demand, using energy efficiently and maximising renewable energy, and to deliver high standards of sustainable construction, including energy and water efficiency (to 110 litres per person per day), climate resilience, sustainable transport, waste minimisation, use of low-impact materials, and adaptable design, alongside biodiversity enhancements, effective refuse and recycling provision, and the integration of high-speed digital infrastructure; these objectives are echoed by Policy HB5 of the HBNP.
- 10.104 In line with the National Planning Policy Framework (NPPF), the development includes sustainable design principles combined with sustainable construction as a key local and national policy objective. Aside from energy efficiency, sustainable construction encompasses other important considerations such as material selection, waste and water efficiency.

10.105 As set out in the Energy and Sustainability Statement, the applicant is committed to sustainable development, following the principles of 'Be Lean, Be Clean, Be Green', which will include a fabric first approach to construction and the inclusion of on-site renewable energy. The proposed development will be designed to meet the energy and CO2 requirements set out in both national and local planning policies as well as the relevant Building Regulations. .

10.106 The proposed development will follow the energy hierarchy, which involves reducing the energy demands of the development through passive design and energy efficiency measures where possible, before meeting the reduced demand via a low carbon technology, in accordance with Policy 33, Policy 35, Policy 36 and Policy 37 of the HDLP.

PLANNING OBLIGATIONS – S106 HEADS OF TERMS

10.107 Policy 39 states that arrangements for new or improved infrastructure provision, will be secured by planning obligation/Community Infrastructure Levy, or in some cases conditions attached to a planning permission, so that the appropriate improvement can be completed prior to occupation of the development, or the relevant phase of the development.

10.108 HDC has adopted CIL and planning obligations would relate to the policy compliant 35% affordable housing element of the scheme and the direct impacts of the development.

10.109 Directly related obligations, including SuDS and Biodiversity Net Gain with HMMP are likely to be included unless these may be secured through appropriately worded planning conditions. These will be agreed with the Officers following further consultation.

10.110 Additionally, highway works are proposed on the public highway and it is anticipated that the completion of these works will be secured under a S278

agreement, to be agreed with West Sussex County Council as the Highways Authority. Such works may be secured by planning condition in the usual manner.

11.0 CONCLUSION

- 11.1 This planning application is submitted on behalf of Jaynic Properties Ltd and Hornbrook Developments LLP and seeks outline planning permission for: *up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access*, in respect of Land at Hornbrook Farm, Brighton Road, Horsham. The scheme is considered a logical extension to Horsham town.
- 11.2 The scheme offers a means of delivering a sustainable residential development to the east of Horsham and is a draft allocation in the emerging Horsham Local Plan. Furthermore, the Shaping Development in Horsham District (SDPAN) in paragraph 5.7 encourages draft allocations to come forward given the robust evidence supporting the development of such sites. The application proposals are therefore considered to be acceptable in principle.
- 11.3 The submitted Illustrative Masterplan demonstrates how development at the site could be integrated into both the town and the surrounding landscape, making the best use of land and delivering housing, including affordable housing, for which there is a clearly identified local need.
- 11.4 The facilities and services of Horsham are accessible from the site by walking, cycling and public transport. The application proposals will provide a range of planning benefits including the provision of potentially up to 117 market dwellings, and potentially up to 63 affordable dwellings (35% of the proposal), and the opportunity for enhanced biodiversity at the site. The proposed development will also include open space and an equipped children's play area to encourage outdoor activity and play for new and existing residents as well as play along the way features and trim trails along the internal amenity routes. The additional housing will also support local services and facilities in the town such as local shops.
- 11.5 The National Planning Policy Framework (the Framework) requires Local Planning Authorities to demonstrate a five year supply of housing land and meet the Housing Delivery Test (HDT). The Council has confirmed within its own assessment that it

cannot currently demonstrate a five year supply of housing land the most recently published supply being just 1.7 years (Dec 2025) and cannot meet the HDT (62%, Dec 2024) and hence is unable to satisfy the requirements of the Framework.
10.26

- 11.6 The proposed development technically conflicts with HDPF Policies, 2, 3, 4 and 26, as the site falls within the countryside on a site not allocated for development within the adopted HDPF. However, the Council is unable to demonstrate a 5-year housing land supply and, as the Local Plan policies that restrict housing development are out of date, the tilted balance applies. The site is a draft allocation within the emerging Local Plan at Policy HA10 (HOR1) which seeks to meet housing demand up to 2040; and the proposal is considered compliant with the SDPAN when considered both in isolation and cumulatively. The proposals constitute sustainable development, providing economic, social and environmental benefits for the local community. There are no adverse impacts that would significantly and demonstrably outweigh the benefits of the scheme and the proposals are therefore considered to be acceptable in principle.
- 11.7 The only way to address the severe shortfall in housing within the District is to approve planning applications for deliverable housing development in sustainable locations. In accordance with paragraph 11 of the Framework, planning permission should therefore be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework.
- 11.8 This application is supported by specialist technical reports which clearly demonstrate that there are no constraints with regards to the deliverability of this proposal and there are no severe adverse impacts in terms of landscape, biodiversity, the local highway network or built form.
- 11.9 Furthermore, where relevant, the proposal accords with the provisions of the development plan, together with the Core Planning Principles set out in the

Framework. Accordingly, the proposal has no material harm which would significantly or demonstrably outweigh the benefits of the scheme.

11.10 This proposal represents an entirely suitable, sustainable and deliverable development that will deliver much needed housing in the short term and accords with the policies set out in the adopted local plan as a whole and with the NPPF. It is therefore respectfully requested that planning permission is granted without delay.