



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North West of Southwater
DESCRIPTION:	Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
REFERENCE:	DC/26/0366
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Though only part of the site is allocated (within the Southwater Neighbourhood Plan), the application is considered to be broadly consistent with the draft policy in the emerging Local Plan (eLP) for a strategic scale development. As such, there is no objection to the principle of development. The application does overprovide larger residential market homes to the detriment of smaller units, which does conflict with the eLP's approach. Similarly, the location of the proposed secondary school conflicts with the Southwater Neighbourhood Plan and indicative masterplan of the eLP. The applicant should provide more detail in relation to open space provision and the approach to delivering and funding new schools need to be clarified, which I understand to be subject to ongoing discussions.	

MAIN COMMENTS:

Introduction

Preamble

These comments discuss national and local policy (emerging and adopted) that relate to the proposed development. They do not set out advice on every issue that may be of relevance to the proposal and do not reference every policy in its entirety. Instead, the comments focus on the following issues:

- The principle of development
- Housing
 - o C3 provision
 - o C2 provision
 - o Affordable Housing and Housing Mix
 - o Gypsy and Traveller Pitches
- Education
- Employment
- Retail and Community uses
- Open Space and Sports Provision

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

The comments also do not discuss the draft NPPF published in December 2025. The document was subject to consultation, and the final version could be substantially different to that consulted upon. In any event, the Chief Planner has announced that it will not be published until 'the summer' and thus may not be in operation prior to this application being determined.

Proposal

The applicant proposes a comprehensive residential-led development comprising a range of uses – including gypsy and traveller pitches, employment units, retail accommodation, community spaces, open space and sport pitches and education provision. The site is on the northwestern edge of Southwater and would represent a large-scale extension to the settlement.

Unusually, the number of dwellings, employment units, etc. is not specified in the description of the application. I have thus used indicative figures stated in supporting documentation but it would be advisable for such figures to be included within the description itself.

Development Plan

The development plan within Southwater includes the Horsham District Development Framework (HDPF, 2015), the West Sussex Joint Minerals Local Plan (2018), the West Sussex Waste Local Plan (2014) and the Southwater Neighbourhood Plan (SNP, 2021).

The respective Minerals and Waste Local Plans are not relevant in this case, but the HDPF and SNP are.

Importantly, given that the 'tilted balance' is engaged in Horsham District, the SNP was formally made on 23 June 2021 and includes housing allocations and policies to meet an identified need. Per NPPF paragraph 14, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits on any relevant decision made within 5 years of the SNP's adoption. It is assumed, for the purposes of these comments, that the application will be determined beyond the five year anniversary of the adoption of the SNP and thus, the provisions of NPPF paragraph 14 will not be in effect and therefore the tilted balance would apply.

Though not part of the development plan, these comments also refer to the Shaping Development in Horsham District Planning Advice Note (SDPAN) where relevant.

Horsham District Local Plan (HDLP) 2023-2040

The Council submitted the Horsham District Local Plan 2023-2040 to the Secretary of State for examination in July 2024. This sets out draft policies and proposals intended to guide development in the district, excluding the South Downs National Park, up to 2040. Examination hearings started in December 2024, but the remaining hearings were cancelled by the original Inspector in a Holding Letter dated 16 December 2024.

On 29 January 2026, the Planning Inspectorate wrote to the Council informing that a new Inspector had been appointed to undertake the examination afresh. The new Inspector intends to proceed with examination hearings, and the first set of hearings will be held between 21 and 24 April 2026.

It is the Council's view that the submission Horsham District Local Plan 2023-40 is the emerging Local Plan (eLP) in the context of NPPF paragraph 49. However, at the time of writing, it is considered that only limited weight should be given to its policies. Weight to the eLP is expected to increase as the examination progresses, including weight potentially given to the Inspector's initial verbal conclusions at the hearings, and the case officer should seek advice regarding weight of the eLP at the time of determination.

Principle of development

The site currently lies outside, albeit adjacent to the built up area boundary. In general, the eLP only supports the expansion of existing settlements in certain situations. As explained in eLP Policy 4, one of the situations is where the site is allocated in the Local Plan or Neighbourhood Plan.

Part of the site, roughly the southernmost third of the site, is allocated in the Southwater Neighbourhood Plan. Policy SNP2.2 Land West of Southwater explains that this part of the site is allocated for between 422-450 units consisting of a minimum of 350 C3 homes and 72 C2 units.

The remainder of the site does not have an allocation (save for an area safeguarded for a school – see education section of these comments) and therefore the proposal would conflict with the adopted development plan. However, there are two other considerations that are material. The first is that the site, as a whole, is a proposed allocation within the eLP as Strategic Policy HA3. HA3 seeks a mixed-use strategic development of approximately 1,000 homes, to which the application would broadly

deliver. As explained in SDPAN (including in paragraph 5.7), the Council should consider positively proposals on sites identified in the eLP.

Secondly, even if the site were not identified in the eLP (or should the eLP not progress towards adoption), paragraph 5.12 of the SDPAN recognises that the Council's housing land supply position is likely to lead to receiving applications on unallocated sites. It explains that "given this position and the principles behind HDPF Policy 4, it will consider positively applications that meet all of the criteria below:

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

It is for the case officer to make a judgement against the criteria listed above, but I consider that the above criteria are met.

Given the above, though noting a conflict with the development plan, there is no Policy Team objection to the principle of development.

Housing

It is recognised the application is in outline and therefore details relating to the provision of accommodation could alter. For the purposes of these comments, I have used the indicative schedule mix identified on page 69 of the Design and Access Statement (DAS).

C3 Provision

The application proposes 1,000 C3 units. This accords with the proposed allocation HA3 of the eLP, that seeks approximately 1,000 homes to be delivered on the site.

Affordable Housing and Housing Mix

The application proposes 350 units as affordable homes. This equates to 35% of the overall C3 units and is consistent with HA3 of the eLP. Strategic Policy 39(2) of the eLP seeks at least 70% of affordable units to be social rented with the remaining up to 30% as low-cost home ownership. The application indicates 245 (70%) units as social rent and 105 (30%) as intermediate units. This is consistent with the emerging policy.

In relation to the size mix of the affordable units, I have assessed the application against the policy expectations identified in Strategic Policy 38 of the eLP (that originate from the findings in the SHMA) in the table below. The figures are what have been indicated by the applicant and the figures in brackets indicate what a proposed policy compliant number of units would be. As can be seen, the mix of affordable units is broadly consistent with the proposed policy approach, albeit with a slight oversupply of 2 bed affordable units and a slight undersupply of 3 and 4 bed affordable units.

House size	Affordable Rented	Intermediate
1 bed	85 (86)	26 (26)
2 bed	82 (74)	43 (42)
3 bed	58 (61)	25 (26)
4 bed+	20 (25)	11 (11)

*Figures in brackets rounded to nearest house

With regards to the mix of market housing, I have also assessed the proposal against HDPF Strategic Policy 16 criterion 1 which requires that the mix of housing sizes, types and tenures should align with the evidence in the latest Strategic Housing Market Assessment (SHMA). In assessing compliance with Policy 16, reference may be made to the policy expectations of eLP Strategic Policy 38 in the table below as the house size proportions stipulated in the eLP reflect the latest SHMA evidence (see Northern West Sussex SHMA, November 2019). Again, the figures expressed are what have been indicated by the application and the figures in brackets are those which are compliant with the SHMA mix. As can be seen in the table below, the mix of market homes is not consistent with the emerging policy. Specifically, it significantly oversupplies larger units (particularly 4+ bedroom homes) and undersupplies smaller units (particularly 2 bedroom homes).

The case officer will need to decide the weight to apportion with this conflict, considering any views that may be obtained from housing colleagues. The Policy Team does however raise significant concern given the magnitude of deviation from the SHMA mix – noting that the SHMA also identifies that Horsham has a strong representation of 4+ bedroom homes in the market sector and there is a strategic need to rebalance this. Furthermore, the SHMA, as updated by the Social Rented and First Homes Study (September 2022), highlights the role played in home ownership affordability by homes with values in the lower quartile of all market homes sold, thus partly addressing the needs of buyers who are otherwise ‘stuck’ in private renting.

House size	Number of market homes
1 bed	21 (33)
2 bed	96 (195)
3 bed	271 (260)
4 bed+	262 (163)

*Figures in brackets rounded to nearest house

C2 Provision

The application proposes 80 C2 units. This accords with SNP 2.2 that seeks a minimum of 72 C2 units, whilst it is noted that C2 units were also expected within HA3 of the eLP. Paragraph 8.3 of the Planning Statement explains that they “will not be self-contained units” and therefore the Council is not seeking an affordable contribution on this element of the scheme. It is considered that this element of the scheme therefore corresponds with the both the development plan and eLP position.

Gypsy and Traveller Provision

The application proposed 5 Gypsy and Traveller (G&T) pitches in the northern part of the site. This matches with the proposed approach in eLP Strategic Policy HA3 (2a) that

seeks 5 G&T pitches. It is therefore considered that this element of the scheme is consistent with the draft policy.

However, it is noted that the proposed siting of the pitches is in close proximity to a proposed employment allocation in the eLP (EM4: Land South West of Hop Oast Roundabout for 3,000 sqm of B2/B8/ E(g)) uses. Care will need to be taken to ensure that residents aren't negatively impacted by noise, disturbance, vibration, etc. associated with such uses. Appreciating that the application is in outline form, it therefore may be advisable to rethink the layout of such uses, including swapping the southern employment site and G&T pitches to reduce such potential conflicts. If not possible, mitigation measures may be required.

Education

The scheme proposes a 1 form of entry (FE) primary school (expandable to 2FE) and a 6FE secondary school (expandable to 8FE). A 60 space nursery is also proposed.

In terms of overall provision, the proposed educational facilities are consistent with eLP Policy HA3(2d) and reflect both needs generated by the proposed development and wider needs.

However, in terms of location, SNP Policy 3 safeguards a particular piece of land for a secondary school that lies immediately to the west of Worthing Road and the eLP's indicative masterplan corresponds with the SNP in relation to the siting of the school. Further, SNP Policy 3.3 explains that if capacity (for secondary school provision) is provided at an alternative site, then the safeguarded land shall be treated as land outside of the built up area boundary.

Though in outline, the indicative masterplan from the applicant shows that the safeguarded area would be developed for residential development and a primary school. It is appreciated that the application is in outline, but at this stage, the applicants are considering another part of the site for the location of the secondary school, as such there is a policy conflict in terms of location of the secondary school. The case officer will need to decide the weight to attribute to such a conflict, though it is accepted that this may be mitigated, in part, by the provision of a school elsewhere on the site.

Policy HA3(2d) of the eLP seeks that land and contributions are needed to meet education provision. I am aware that discussions relating to the funding of schools are ongoing, with input being gathered from West Sussex County Council, as Local Education Authority, particularly important. However, the understanding from the collection of evidence for the Local Plan is that the secondary school should be brought forward in an initial phase of development, whilst the viability work for the Local Plan demonstrates that a policy compliant scheme is viable with provision of a secondary school.

Employment

The applicant proposes approximately 4 hectares of business/employment floorspace in the northern part of the site. This accords with the draft policy in eLP HA3(2c) and therefore no conflict in principle is identified.

eLP Strategic Policy 29 is also material as it is intended to be read alongside eLP HA3. The policy requires that opportunities are provided for employment and for people to live and work locally. Criterion 1 also states that proposals should take account of mitigation

measures identified and incorporate a range of unit sizes, tenures and flexibility of use with regard to floor to ceiling heights, floor loading, power, servicing and loading facilities. The case officer will therefore need to consider not just the overall quantity of provision, but will need to make a qualitative assessment.

There is support for the way the use classes are reflected in the application description and the land use parameter plan (e.g. 'business and employment space (Use Classes B2, B8 and E(g))'. It would be preferred that this is conditioned to avoid slippage into retail or other E use classes, in order to appropriately control out of town retail and to suitably manage.

It would also be beneficial for further information to be provided in relation to the phasing of employment. It would be undesirable if employment provision would be left until after all of the housing had been provided. Again, the case officer may wish to consider the introduction of conditions to avoid this. In particular, given the types of businesses typically found in the district, it would be desirable if smaller units were delivered early so that SME's have the ability to move into premises to begin/expand their businesses.

Retail and Community Uses

Policy HA3(2b) of the eLP seeks the provision of a neighbourhood centre that delivers retail and community uses whilst not undermining the role of Lintot Square as the primary centre of Southwater. The application suggests that 2,000 sqm of commercial and community floorspace is proposed and a Retail Impact Assessment (RIA) has been submitted that concludes that there is unlikely to be any undue impact of the development in the village centre.

It is for the case officer to review the RIA in detail. If the RIA is correct, however, then the proposal is compliant with the proposed policy.

Open Space and Sports Provision

I have utilised the open space calculator, which reflect the findings from the Playing Pitch Strategy Open Space, Sport & Recreation Review 2021, inputting the indicative housing mix suggested by the applicant. My calculations are attached. This suggests that around 9.7 hectares are required from the scale of development proposed. The applicant indicates that 59 hectares of such space will be provided, which more than meets such requirements in overall terms.

However, the overall open space figure consists of requirements for different types of space. I was unable to find precise details of the different elements and it is advised that this should be supplied by the applicant and reviewed by Parks and Countryside colleagues in order to determine whether the provision is acceptable.

Other Matters

My comments do not address numerous other matters, such as ecology, landscape, trees, flooding, highways, etc. which will be important in the determination of the application as other consultees will provide their views on such matters.

ANY RECOMMENDED CONDITIONS:

The potential for conditions for issues relating to the employment provision has been raised in the report. It will be for the case officer to determine whether this needed and the precise wording of the conditions.

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DATE:	20/05/2026