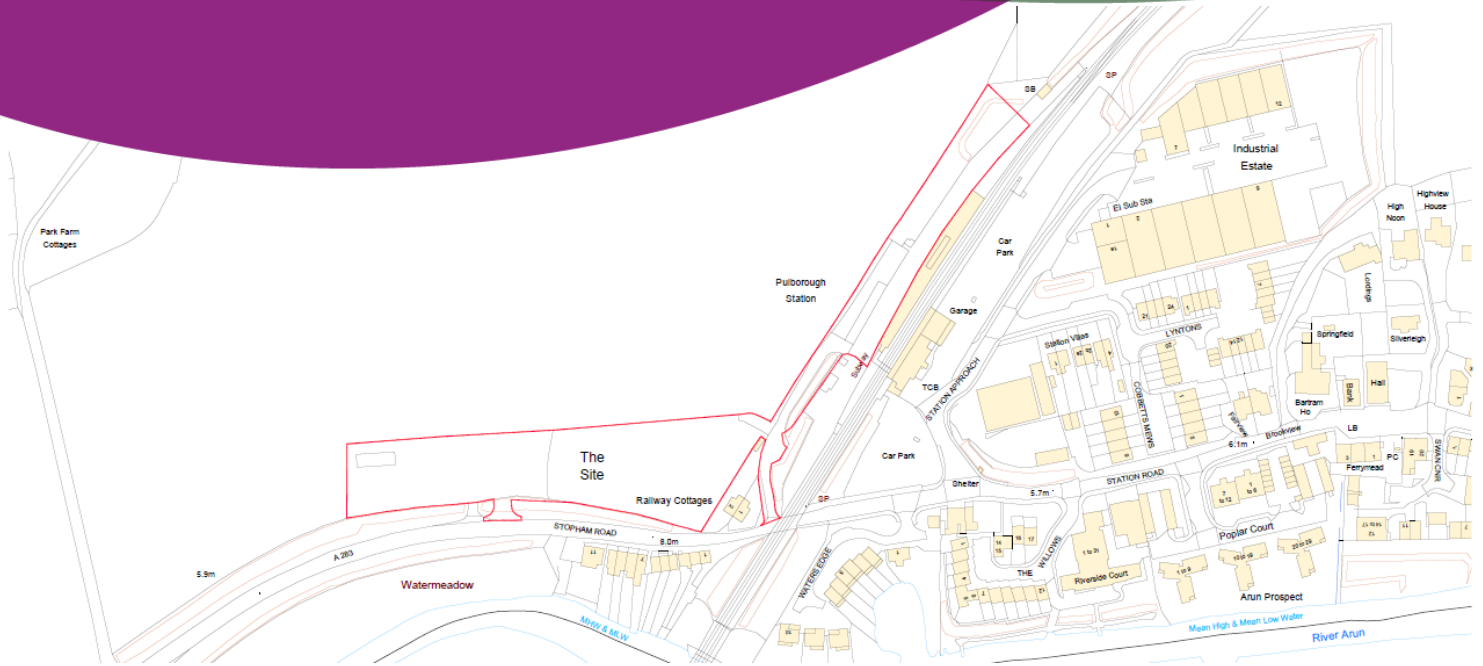




PLANNING STATEMENT

in respect of
Land at Allotment Gardens, Stopham Road, Pulborough

on behalf of
Stonewater

27 March 2026
Client Reference: RCA01038h
Last User: KP

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1. INTRODUCTION

- 1.1. This Planning Statement has been prepared by RCA Regeneration Ltd (the Agent) on behalf of Stonewater (the Applicant).
- 1.2. This Planning Statement supports a s73 planning application to vary planning permission DC/22/0661 relating to land at Allotment Gardens, Stopham Road, Pulborough, West Sussex (the Site).
- 1.3. The application is to be submitted to Horsham District Council as Local Planning Authority (the LPA).
- 1.4. This Statement describes the site, its relevant planning history and the nature of the proposed development before identifying the relevant policies under which the proposals will be assessed at a local and national level. The Statement then carries out a planning assessment of all relevant material considerations, to aid in the consideration of the application.
- 1.5. The application is accompanied by the following supporting documents:
 - Covering letter
 - Application form, certificates and application fee
 - CIL forms
 - Planning Statement
 - Landscape Technical Note
 - Rail Parking Demand Report
 - Letter of support from Horsham District Council Affordable Housing Strategy and Enabling Lead Officer
- 1.6. Under Section 62 of the Town and Country Planning Act 1990 (as amended), it is considered that the information submitted with this planning application is sufficient to allow determination.
- 1.7. The remainder of this Statement is set out as follows:
 - Section 2 – Relevant Site Details and Proposals
 - Section 3 – Development Plan and Other Material Considerations
 - Section 4 – Planning Assessment
 - Section 5 – Summary and Conclusions

2. RELEVANT SITE DETAILS AND PROPOSALS

- 2.1. The application site lies adjacent to Pulborough Station and includes part of the Network Rail site and part of the former Allotment Gardens site.
- 2.2. The site already benefits from planning permission DC/22/0661, which grants full planning permission for development of the site to provide 23 dwellings and 6 flats with ancillary parking, garaging, and landscaping, and the construction of a 106-space station car park, all served by new access on to Stopham Road, as well as construction of private parking bays to serve existing dwellings on Stopham Road, served by new access from Stopham Road.
- 2.3. The planning permission being amended is itself a s73 application which amended earlier planning permissions DC/16/0728 and DC/21/1535.
- 2.4. The development was lawfully implemented in 2021 under the earlier permission DC/21/1535, but construction has been paused whilst various amendments to the planning permission have been sought.
- 2.5. The s106 agreement has recently been amended to change the scheme to facilitate 100% affordable housing.
- 2.6. This application proposes to remove conditions 15 and 16 of planning permission DC/22/0661.
- 2.7. Condition 15 reads:

Pre-Occupation Condition: The development hereby permitted shall be undertaken in full accordance with the water neutrality strategy (SRE for MH Architects Ltd, dated 19 Dec 2024 (on behalf of Stonewater)). No dwelling hereby permitted shall be first occupied until evidence has been submitted to and been approved in writing by the Local Planning Authority that the approved water neutrality strategy for that dwelling has been implemented in full. The evidence shall include the specification of fittings and appliances used, evidence of their installation, and completion of the as built Part G water calculator or equivalent. The installed measures shall be retained as such thereafter.

Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), and to allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

- 2.8. The application seeks removal of this condition following Natural England's withdrawal of its 2021 Water Neutrality Position Statement, as this means bespoke water-neutrality mitigation is no longer required.
- 2.9. Condition 16 reads as follows:

Pre-Occupation Condition: No dwelling hereby permitted shall be occupied until the 106 space car park hereby permitted has been completed and is open to the public for use.

Reason: In order to secure delivery of benefits of the development which were a strong material consideration in determining to permit the development which would otherwise have been contrary to the provisions of the Development Plan and in order to provide additional parking to

serve the railway station in accordance with Policy 41 of the Horsham District Planning Framework (Adopted November 2015).

- 2.10. The application seeks removal of this condition to allow the dwellings to be occupied before the car park has been completed. The car park and associated works would remain part of the approved proposals; the only change would be that they would not be required to be delivered ahead of the housing.
- 2.11. The application also seeks to vary associated s106 planning obligations in relation to conditions 15 and 16.
- 2.12. This application proposes no changes to the development itself. As such, a detailed description of the proposals and site constraints is not set out here. Of relevance to this application, the part of the site proposed for the car park falls within the built-up boundary of Pulborough, whilst the part of the site proposed for housing falls outside but immediately adjacent to the boundary. The site also lies outside of, but in proximity to, the South Downs National Park.
- 2.13. The detailed justification for the proposals is set out in the Planning Assessment section of this Planning Statement.

3. DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan

- 3.2. For the purposes of this application, the Development Plan comprises the Horsham District Planning Framework (adopted on 27 November 2015) and the Pulborough Neighbourhood Plan 2015-2031 (made on 08 October 2025)
- 3.3. Development Plans are required to be updated every five years; therefore, this review is now significantly overdue, albeit underway. Accordingly, the relevant policies in the existing Development Plan carry weight according to their consistency with the National Planning Policy Framework.
- 3.4. The relevant policies for this application are as follows:

Horsham District Planning Framework 2015

- Policy 1 - Strategic Policy: Sustainable Development
- Policy 2 - Strategic Policy: Strategic Development
- Policy 3 - Strategic Policy: Development Hierarchy
- Policy 4 - Strategic Policy: Settlement Expansion
- Policy 15 - Strategic Policy: Housing Provision
- Policy 16 - Strategic Policy: Meeting Local Housing Needs
- Policy 24 - Strategic Policy: Environmental Protection
- Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
- Policy 26 - Strategic Policy: Countryside Protection
- Policy 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 43 - Community Facilities, Leisure and Recreation

Pulborough Neighbourhood Plan

- Policy 1 – A Spatial Plan for the Parish
- Policy 15 - Design

Other Material Considerations

Five Year Housing Land Supply

- 3.5. As the Local Plan is more than five years old, the housing requirement for the district must be calculated using the Standard Method until a new Local Plan is adopted.
- 3.6. The Housing Delivery Test 2023 (published December 2024) shows that the Council delivered 62% of its housing requirement. As such, the Council was required to publish an Action Plan and apply a 20% buffer to its five year housing land supply calculation. The Presumption in Favour of Sustainable Development must also be applied to all applications for housing development.
- 3.7. The Council last published an Authority Monitoring Report on 19 December 2025 for the year 01 April 2024 – 31 March 2025. It includes a five year housing land supply as at 01 April 2025 and demonstrates a supply of only 1.7 years. The application site is included in that supply, in years 1 and 2.
- 3.8. The Council's Housing Delivery Action Plan 2025 is a material consideration. As part of this, the Council produced a Facilitating Appropriate Development document in 2022. The FAD recognises the absence of a 5-year housing land supply and seeks to direct and approve development outside of built-up area boundaries where it adheres to policy criteria. The FAD was reviewed in 2025, updated and republished as the Shaping Development in Horsham District planning advice note. This is also a material consideration.
- 3.9. For the purposes of determining planning applications, the Council therefore accepts it cannot demonstrate a five-year housing land supply, and the presumption in favour of sustainable development should be applied to all applications for housing development.
- 3.10. In accordance with NPPF paragraph 11d, planning permission should therefore be granted unless other policies in the NPPF (set out in footnote 7 – none of these apply to the site) provide a strong reason for refusing development, or *“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”*. This latter part is known as the ‘tilted balance’ and is considered in the Planning Assessment section of this Planning Statement.
- 3.11. The operation of the tilted balance is also influenced by NPPF paragraph 14, because there is a made neighbourhood plan which is less than five years old and contains housing allocations. This sets out that *“the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits”*. This is also considered in the Planning Assessment later in this Planning Statement.

Emerging Local Plan

- 3.12. The Horsham District Local Plan 2030-2040 was submitted for examination on 26 July 2024, and some hearings have taken place. However, the Inspectors found that significant additional work is required to make the Plan sound. The Council is currently awaiting a Procedural Exploratory meeting with the Inspectors to discuss how to progress. As such it is considered that the emerging policies can only be afforded limited weight.

National Planning Policy Framework (2024)

- 3.13. The NPPF was last revised in December 2024. It emphasises the importance of sustainable development and notably the presumption in favour of sustainable development.
- 3.14. A revised NPPF consultation draft was published on 6 December 2025 and is now subject to consultation. It is capable of being a material consideration, however, it is of limited weight until it is published in its final form.
- 3.15. The following paragraphs of the NPPF are considered to be particularly relevant to these proposals:
- **Paragraph 7** confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.
 - **Paragraph 8** sets out the overarching objectives of sustainable development, including economic, social and environmental sustainability.
 - **Paragraph 10** states that a presumption in favour of sustainable development lies at the heart of the NPPF.
 - **Paragraph 11** sets out how the presumption in favour of sustainable development should be applied.
 - **Paragraph 39** identifies that local planning authorities should approach decisions on proposed development in a positive and creative way, using the full range of planning tools available.
 - **Paragraph 61** states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
 - **Paragraph 73** recognises the important contribution that small and medium sized sites can make to the housing requirements of a local area and requires local planning authorities to support the development of windfall sites, giving great weight to the benefits of using suitable sites within existing settlements for homes.
 - **Paragraph 78** requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old.
 - **Paragraphs 96-108** promote healthy and safe communities.
 - **Paragraph 116** confirms that development should only be prevented or refused on highways grounds if there would be unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
 - **Paragraph 124** sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

- **Paragraph 129** states that planning policies and decisions should support development that makes efficient use of land, taking into account:
 - The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - Local market conditions and viability;
 - The availability and capacity on infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - The importance of securing well-designed, attractive and healthy places.
- **Paragraphs 131-141** seek to achieve well-designed places.
- **Paragraphs 161-182** set out ways that developments are expecting to meet the challenge of climate change and flooding.
- **Paragraphs 187-195** include policies for conserving and enhancing the natural environment.
- **Paragraphs 196-201** are concerned with ground conditions and pollution.
- **Paragraphs 202-221** cover how development should conserve and enhance the historic environment.

National Planning Practice Guidance

- 3.16. The PPG supports the NPPF, providing more detailed guidance regarding the preparation and determination of planning applications, and related technical and procedural matters. These have been considered where relevant in the preparation of this application.

4. PLANNING ASSESSMENT

Removal of condition 15 - Water Neutrality

- 4.1. When this application was originally determined in 2016 and first amended in 2021, water neutrality was not a material consideration. However when it was amended again in 2022, there had been a material change in this respect, as Natural England had published a Position Statement in September 2021 which advised all local authorities within the Sussex North Water Supply Zone that it could not be concluded that existing water abstraction within the Sussex North Water Supply Zone is not having an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites near Pulborough.
- 4.2. The Position Statement advised the affected local authorities that developments within the Sussex North Supply Zone must not therefore add to this impact, and one way of achieving this is to demonstrate water neutrality, namely that the use of water in the supply area before the development is the same or lower after the development is in place. This was in addition to the requirements of the Habitat Regulations.
- 4.3. As such, the applicant was required to submit a Water Neutrality Strategy, which is secured by condition 15 of the planning permission.
- 4.4. On 31 October 2025, Natural England issued a Withdrawal Statement confirming that its Water Neutrality Position Statement of September 2021 had been withdrawn, following an agreement between Natural England, Southern Water and the Environment Agency that a reduction in the licence cap on water abstraction will ensure with sufficient certainty that development will not adversely impact the protected Arun Valley habitats. As such, Natural England advised that local authorities are not required to consider these measures when determining relevant plans or projects.
- 4.5. In this regard, Horsham District Council no longer requires submission of water neutrality statements to support planning applications, no longer requires s106 contributions towards the previously proposed Sussex North Water Certification Scheme, and no longer imposes bespoke conditions or s106 obligations to secure water neutrality.
- 4.6. As such, this application requests the removal of the condition and any planning obligations that relate to water neutrality, as these matters can be dealt with satisfactorily under the Building Regulations.

Removal of condition 16 – to allow the housing to be delivered before the car park

- 4.7. It is proposed to delete condition 16 and amend the related s106 obligations, to allow the housing to be occupied before the car park is completed.
- 4.8. This is due to reduced demand for car parking at the station, resulting in the works being pushed out of the current programme of works by Network Rail. A Rail Car Park Demand report dated October 2025 is submitted in support of the application, which demonstrates that there is no current business case for the construction of the new car park, as the existing car park has sufficient capacity to meet demand and immediate likely growth in demand.
- 4.9. As such, there is currently no planned date for the works, and we understand this will be subject to periodic review by Network Rail. However, even once the works are confirmed in a funded programme of works, we are advised it is likely to have a lead in period around 18 months to 2 years before the construction period could commence.

- 4.10. By contrast, demand for housing remains high and is even more acute now than when the application was originally determined. At the time the original application was approved in 2018, the Council could demonstrate a five year housing land supply. However the current housing land supply position of the Council is only 1.7 years.
- 4.11. The application site forms part of the current supply trajectory, anticipated to be delivered in years 1 and 2 of the current monitoring period (2025-2027). The imperative to deliver it as soon as possible, within the five year monitoring period to 2030, therefore carries significant positive weight in the planning balance.
- 4.12. The Homes England grant funding for the site requires the housing development to be underway before March 2027 with final completion before March 2029. This also ensures delivery within the Council's current five year housing land supply period. However it will not be possible to achieve this if the housing cannot be occupied until the car park is completed and operational.
- 4.13. Since the last planning application for the site was approved, the s106 agreement has also recently been amended to change the scheme to 100% affordable housing. This adds further positive weight in the planning balance.
- 4.14. We are aware that the first planning permission, DC/16/0728, was recommended for refusal by officers but approved by the Planning Committee. The reasons for recommending refusal were:
- Location outside built up area boundary and not allocated in Local or Neighbourhood Plan for housing
 - Impact on rural character and setting of South Downs National Park
- 4.15. Contrary to the officer recommendation, Planning Committee approved the application, with the minutes recording that they gave weight to:
- Increased capacity for commuter parking;
 - The erection of bollards to prevent parking along part of the Stopham Road (entrance to the Village);
 - Creation of a surfaced car parking layby for existing residents of the Stopham Road;
 - Moving the 30mph speed limit further west from the village (increasing the 30mph zone);
 - A traffic light system to allow pedestrians to pass under the railway bridge safely; and
 - Step-free access (to improve disabled accessibility) to the station's northbound platform.
- 4.16. The proposal to delete condition 16 relates to the delivery timings of the first and sixth items on this list. They remain part of the proposed development but would not be delivered ahead of the housing. The other four items would still be delivered in accordance with the original timetable.
- 4.17. It is necessary to demonstrate that the proposals are still acceptable even without this condition. As such, the two previously recommended reasons for refusal, and the positive benefits that outweighed these, are considered below, and a fresh planning balance is undertaken.

Location and planning status of the site

- 4.18. It is accepted that the site is not allocated in the Local Plan. The Local Plan was adopted in 2015 before the original application was submitted in 2016 and granted planning permission in 2018. As the site already has planning permission and has lawfully commenced, it is not proposed for allocation in the emerging Local Plan because it is an existing commitment.
- 4.19. It is also accepted that the site is not allocated in the Neighbourhood Plan. A Submission (Regulation 16) version was consulted upon in November 2015-January 2016, which allocated the

site for 28 dwellings. However, having considered the representations received in response to the consultation, the Council withdrew that version of the plan to work on an amended version. The next iteration of the Neighbourhood Plan was consulted upon in July 2020. As the site had been granted planning permission in 2018, it was not proposed for allocation in the amended Neighbourhood Plan.

- 4.20. It is accepted that the part of the site where the housing development is located is outside the built-up area of Pulborough, although it is immediately adjacent to it. The part of the site proposed for the car park is inside the built up area. The site is therefore not entirely in accordance with the Local Plan or Neighbourhood Plan due to the location of part of it.
- 4.21. However, as the Presumption in Favour of Sustainable Development is engaged due to the lack of five year housing land supply, the fact that the site is not allocated and is partly outside the settlement boundary does not automatically lead to a refusal of the application.
- 4.22. Pulborough is designated in the Local Plan as a Small Town/Larger Village, which indicates that it has a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and bus services. It is therefore an inherently sustainable location.
- 4.23. Due to the lack of housing land supply and failing the Housing Delivery Test, the Council was required to produce a Housing Delivery Action Plan 2025 and as part of this the Council produced a Shaping Development in Horsham District planning advice note. This effectively provides guidance to developers to assist in making applications for housing that meet the Presumption in Favour of Sustainable Development.

- 4.24. Para 5.12 of that document says:

“The Council recognises that it is likely to receive applications outside of defined BUABs and on unallocated sites as it is unable to demonstrate a five-year housing land supply. 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.”*

- 4.25. The site scores favourably against these five criteria, indicating that this application should be supported by the Council:

- The site is partly within and partly adjoining the BUAB.
- The level of expansion is appropriate to the scale and function of the settlement
- The proposal would meet local housing needs. The extant permission secures the site for 100% affordable housing. Please see the submitted letter of support from the Council's Affordable Housing Strategy and Enabling Lead Officer, setting out that there are 166 households in Pulborough on the Housing Register, and the application site will make a

significant contribution to meeting that need through delivery of 15 social rent and 14 affordable rent homes.

- The development does not prejudice comprehensive long-term development. It already has an implemented planning permission.
- The development is contained within an existing defensible field boundary, maintaining and enhancing landscape character features.

- 4.26. Whilst the site is not allocated and is not entirely located within the BUAB means that it is not in full accordance with the Local Plan or Neighbourhood Plan, this is only a technical breach that does not automatically give rise to adverse impacts. It is fully policy compliant in all other respects and meets with the Council's Housing Delivery Action Plan.
- 4.27. The fact that an extant, implemented planning permission exists for the site is a fallback position which also a material consideration carrying significant weight in this respect.
- 4.28. It is therefore considered that the location of the site partly outside the BUAB and not benefitting from an allocation, is not sufficient reason to refuse the application.

Impact on rural character and setting of South Downs National Park

- 4.29. The Committee Report to the 2016 applications recommended a reason for refusal as follows
- "The proposed development is located outside of the existing settlement and in close proximity to the South Downs National Park and in a prominent and elevated position above the open countryside to the south. The proposed development, by reason of its extent beyond the existing development on Stopham Road, would result in the inappropriate urbanisation of this part of Stopham Road, which currently has a distinctly rural character due to the open and rural nature of the site. In addition, the proposal would result in harm to the setting of the South Downs National Park, by reason of the urbanisation of the site and associated external lighting."*
- 4.30. It is noted that the South Downs National Park Authority has not objected to subsequent applications on the site.
- 4.31. In determining the 2016 application, Planning Committee determined that the significant community benefits of the scheme outweighed the policy objections to it. However in order to be robust, this current application seeks to address the concerns previously raised, in case they are raised again on this application.
- 4.32. A Landscape Technical Note is submitted alongside this application to explain why the proposals are acceptable in relation to impact on the South Downs National Park. It considers the established landscape baseline and the proposed residential scheme, in the context that the previous permission has been implemented so remains extant.
- 4.33. The Landscape Technical Note sets out that the residential part of the site forms part of a semi-urban settlement edge rather than an intact rural landscape, and that the proposed car park works lie within the built up area. Invisibility with the South Downs National Park is extremely limited and the site is not found to contribute to its special qualities.
- 4.34. As such it is considered that the combined landscape and visual effects of the proposals remain modest and contained, with minor and localised effects on rural character and negligible effects on the setting of the South Downs National Park.
- 4.35. The Landscape Technical Note concludes that the landscape and visual effects of the proposals do not amount to significant harm. Please refer to that document for the detailed assessment.

- 4.36. Any harms identified should also be considered against the backdrop of an existing implemented permission, so the development and any impacts can go ahead in any case.

Planning balance of harms and benefits

- 4.37. As the tilted balance is engaged, the NPPF paragraph 11 directs that permission should be granted unless *“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”*.
- 4.38. Paragraph 14 then states *“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement”*
- 4.39. However it is considered that no tangible adverse impacts arise from the proposals being located partly outside the BUAB. The breach is technical in nature and the Council’s objection was therefore ‘in principle’ rather than due to any specific identified harm.
- 4.40. The proposals accord with the Council’s Shaping Development in Horsham District document, which was created as part of the Action Plan due to the failure of the Housing Delivery Test, to address the lack of five year housing land supply.
- 4.41. The delivery of housing, and particularly the delivery of affordable housing, attracts substantial positive weight in the planning balance.
- 4.42. So too does the provision of the four specified highway improvements along Stopham Road, which are directly related to the proposed development and will be delivered to the same timetable as the previous application.
- 4.43. The improvements to the train station also remain part of the proposals and attract positive weight in the planning balance. It is accepted that this weight might be reduced as a result of the removal of the requirement to deliver this ahead of the housing. However we have demonstrated that the proposals would remain acceptable even with this amendment, because of the positive weight afforded to all the benefits of the scheme. The access road through the housing development will still be built up to the boundary of Network Rail’s land, to facilitate the new access to the car park when it is delivered.
- 4.44. To further support removal of this condition, we do not consider the condition to secure delivery of the car park ahead of the housing to be in accordance with the necessary tests¹ given that the works address an existing deficit and not one arising from the development proposals. The applicant is however content to retain the proposals as part of the planning permission, and seeks only to remove requirements to deliver them ahead of the housing.
- 4.45. As such, we consider that the benefits of the proposals significantly and demonstrably outweigh the adverse impacts of the proposals, and should be granted planning permission.

¹ Para 55 of the NPPF and para 003 of the PPG

5. SUMMARY AND CONCLUSIONS

- 5.1. The Council is currently unable to demonstrate a five year housing land supply and also has a significant shortfall in delivery of affordable housing, with a lengthy waiting list for Pulborough.
- 5.2. The proposals already benefit from an implemented planning permission and the site forms part of the trajectory for the five year housing land supply.
- 5.3. The housing element of the scheme may not be delivered if this application is not approved, which would reduce the housing land supply further, contrary to the aims of the NPPF and the Council's Housing Delivery Action Plan.
- 5.4. The proposals would deliver much needed housing, including affordable housing at a level above policy requirements.
- 5.5. This application does not change the substance of the permitted scheme, and seeks only to delay provision of the railway station car park where it is clear that there is no intention to develop it to the timeline envisaged by the original planning application.
- 5.6. It is considered that it was not reasonable to require this in advance of delivery of the housing, given that it addresses an existing deficit: the car park need did not arise as a result of the proposals.
- 5.7. The other benefits of the improvements to Stopham Road would still be delivered alongside the housing.
- 5.8. As such the proposals would still deliver the same benefits previously identified, as well as additional benefits given the current housing land supply position. It would simply allow the housing delivery to happen before the car park. It also does not preclude the delivery of the car park when Network Rail are content to develop it in the future.
- 5.9. The proposals are broadly in accordance with the Development Plan, with only a technical breach of locational policy identified. All other material considerations including the NPPF and the Council's Action Plan indicate that planning permission should be granted.
- 5.10. As such, the adverse impacts of the proposal would not significantly outweigh the benefits, and planning permission should be granted without delay.

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