[redacted]
Sent: 26 May 2026 17:36
To: East 2
[redacted]
Subject: Appellants Final Comments - Appeal ref: 6007104 / Planning Application ref: DC/24/0535 - Land Adjacent To Cedar Cottage [DMHS-DMS.FID7750429]
Attachments: 3376143.pdf; Shaping-Development-in-Horsham-District-Planning-Advice-Note.pdf

[redacted]

Re: Appeal ref: 6007104 – Appellants Final Comments

Dear Sir / Madam,

We have reviewed the LPAs Appeal Statement and would like to respond to the comments in section 7 of this Statement (Other Matters – Great Crested Newts).

We understand that the Council's consultee NatureSpace has provided an updated comment during this appeal (although this has not been made available to the appellant nor is it viewable on the LPAs website), we note from the LPAs Statement that NatureSpace has commented that prior to the determination of any appeal the appellants should either:

- Undertake eDNA surveys on ponds with ecological connectivity to the site, to determine the presence or likely absence of great crested newts. Should negative results be obtained, then a PWMS would be suitable for the scale of the development; should a positive result be obtained then a licence would be required to undertake works. There are 2 licensing options available, EPSL or DL. The EPSL would require surveying surrounding ponds and submitting mitigation plan to the LPA to demonstrate how impacts on the species can be adequately addressed. This should be submitted prior to determination, or
- Alternatively, should the applicant not wish to wait to undertake surveys, then the District Licence can be joined at any time without the need for further surveys. It is worth noting that the applicant has enquired for the District Licensing scheme however has not yet joined. In order to take this route, the applicant must submit a NatureSpace Report or Certificate prior to determination to evidence to the LPA that any impacts have been appropriately compensated and mitigated for.

For context, in this instance, it is not a case of the appellant not wanting to undertake the surveys, but rather not being able to obtain permissions from all the landowners to undertake the surveys on the neighbouring ponds. It should be noted that it has always been understood and accepted by the appellant that a licence would be required should the application be approved. The PEA which was submitted in support of the application noted that the appeal site falls within a red impact risk zone for Great Crested Newts and advised that a licence would be required, and it was acknowledged in the appeal statement that should the appeal be allowed, the appellant would seek to apply for a licence.

Since the receipt of the LPAs Appeal Statement the appellant has been in contact with NatureSpace and has applied to join the District Licence scheme and is in the process of obtaining this licence. Whilst we note that today is the date on which final comments should be submitted for the appeal, the licence is still in the process of being produced, and it will be submitted to both PINS and the LPA in support of this appeal as soon as it is issued by NatureSpace.

We acknowledge that it is at the Inspectors discretion as to what information can be taken into consideration in determining the appeal, however, given the Council Consultees comments, the submission of further supporting information regarding the GCN District Licence is considered to be material to the appeal, and as such it is requested that any additional information submitted on this matter be taken into consideration. We also note that the LPAs Appeal Statement at 7.4 accepts that further information or the district licence can be submitted in support of the appeal and states that "In the event a district licencing certificate is provided by the appellants prior to determination…it is requested that full accordance with the licencing scheme is secured via conditions specified by Nature Space." The appellant is happy to agree to this.

However, given that the licence is still a work in progress and not yet complete at the time of final comments on the appeal, and in the event that further information relating to the GCN district licence is not taken into consideration by the Inspector, the appellant is of the view that a suitable alternative approach would be the imposition of a Grampian style condition requiring the submission of this licence prior to any development on site or any site investigation works

taking place on site. This would ensure that any potential GCN impacts have been appropriately considered and associated risks mitigated for. The suggested wording for such a condition would be as follows: *No development shall commence and no site preparation, site investigations or site clearance works shall take place until the required Great Crested Newt District Licence Certificate has been submitted to and approved in writing by the local planning authority and any and all works on site shall be implemented in full accordance with the licensing scheme.*

Other relevant matters

We would also like to bring the attached recent appeal decision (ref: APP/Z3825/W/25/3376143) to the attention of the Inspector - this appeal was allowed on 22nd May 2026, and relates to a site which is directly north of the appeal site. The appeal site (land east of Charlwood Drive) was not allocated in the Neighbourhood Plan and the conflict with the spatial strategy of the HNP was cited as one of the reasons for the refusal of the application, and the wording of the first reason for refusal of this application at land east of Charlwood Drive was exactly the same first reason for refusal of this appeal scheme. In considering this point the Inspector noted at Paragraph 87 that: *In summary, the HNP is less than five years old and contains policies and allocations to meet its housing requirement. However, significant material changes in circumstances since the HNP was made suggest its identified housing requirement is no longer reliable. Furthermore, the shortfall in housing land supply across the Council's area is not likely to be remedied in the short term, and I anticipate will persist until the emerging Local Plan reaches adoption. Therefore, the weight to be afforded to the proposal's conflict with HNP Policy 1 is diminished."* It is considered that the attached appeal decision is a material consideration and adds further weight to the appellants argument that the HNP seeks to achieve a housing requirement that does not accurately reflect up-to-date housing need and therefore the protection given to HNP under paragraph 14 of the NPPF should be diminished, and furthermore the benefits of the appeal scheme would outweigh the limited conflict with the Neighbourhood Plan and the purposes of paragraph 14 of the NPPF.

We also note that since the refusal of this application the Council published the 'Shaping Development in Horsham District Planning Advice Note 2025' (SDPAN), this Advice Note is referred to in the attached appeal decision, and for ease of reference a copy of the SDPAN is attached. The SDPAN acknowledges that the housing target in the HDPF can no longer be used for calculating housing land supply, it also states at paragraph 5.12 that *"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."*

A synopsis of how the appeal scheme complies with each of the above criteria in order is set out below, and it is important to note that the appeal site complies with each criterion:

- *The BUAB boundary of the village is located immediately to the west of the application site, the site therefore adjoins the (BUAB).*
- *Henfield is identified as a village that provides a range of facilities and services, along with access to public transport. These are factors which have influenced the classification of the village by the Council as being capable of supporting new residential development. The site is within walking distance of village facilities and services.*
- *The application site would provide a small, but in the context of the LPAs housing land supply, a nonetheless important contribution to the housing need in the village and the District.*
- *The proposal would not conflict with other development proposals in the development plan.*
- *The site boundaries are considered to be defensible being comprised of trees and mature vegetation, and the proposal would ensure that the landscape character features are maintained.*

The compliance and consistency of the appeal scheme with all of the required criteria of the SDPAN is considered to weigh heavily in support of the appeal scheme. As acknowledged by the Inspector at paragraph 71 of the attached appeal decision "there would be an expectation that the SDPAN would be applied in decision-making and the SDPAN forms a material consideration in my decision."

I trust the above and attached is acceptable, however, please contact me or my colleague Peter (cc'd). Please note that the LPA has been copied into this email.

Kind regards

[redacted]

[redacted]

[redacted]

Planning Inspectorate

Appeal Decision

Hearing held on 28 April 2026

Site visit made on 28 April 2026

by E Dade BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 22 May 2026

Appeal Ref: APP/Z3825/W/25/3376143
Land to the east of Charlwood Drive, Henfield BN5 9FA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
- The appeal is made by Croudace Homes against the decision of Horsham District Council.
- The application Ref is DC/24/1932.
- The development proposed is development comprising up to 191 dwellings with open space, landscaping and associated infrastructure (all matters reserved except for access).

Decision

1. The appeal is allowed and outline planning permission is granted for development comprising up to 191 dwellings with open space, landscaping and associated infrastructure (all matters reserved except for access) at land to the east of Charlwood Drive, Henfield BN5 9FA in accordance with the terms of the application, Ref DC/24/1932, subject to the conditions in the attached schedule.

Preliminary Matters

2. For clarity, I have included the site's postcode in the address details above.

3. The Decision Notice sets out four reasons for refusal. However, certain matters have materially changed since the Council's determination of the application.

4. On 31st October 2025 Natural England withdrew its requirement for development in the Sussex North Water Supply Zone to demonstrate water neutrality. Consequently, the parties agree that the second reason for refusal would be capable of being resolved, subject to the satisfaction of the Appropriate Assessment (AA) process. The AA is set out in my reasoning, below.

5. The fourth reason for refusal concerns the absence of a mechanism to secure the provision of affordable housing and necessary local infrastructure, or financial obligations required to make the development acceptable. During the appeal, a completed deed pursuant to section 106 of the Town and Country Planning Act 1990 as amended (s106 agreement) was submitted containing planning obligations which would come into effect on grant of planning permission. On 29 April 2026, details of the obligations were published on the Council's planning register, providing opportunity for public inspection in advance of my decision.

6. The parties do not dispute the planning obligations within the s106 agreement would resolve the fourth reason for refusal. Therefore, my consideration of this matter is limited to whether the planning obligations would comply with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (CIL regulations).

7. The third reason for refusal concerns the submitted baseline metric and Habitat Management and Monitoring Plan (HMMP), which the Council concluded contained inconsistencies such that an accurate baseline had not been provided and the statutory Biodiversity Net Gain (BNG) condition would not be capable of being discharged. Following the Council's decision, the appellant has provided an updated HMMP and metric which were subsequently reviewed by the Council's Ecologist / BNG Officer. Based on this updated information, the Council considers the site baseline is acceptable and the metric demonstrates the required 10% BNG would be achieved through a combination of on-site and off-site measures. Since the matter of whether the proposal would meet the statutory information requirements is no longer in dispute, my consideration of BNG is limited to the suitability of the proposed planning obligations.

Main Issues

8. Having regard to the above, the main issues in this appeal are:

- Whether the proposed development would be in a suitable location, having regard to the local development strategy;
- Whether the proposed development would make suitable provision for affordable housing and other infrastructure required to make the development acceptable;
- The effect of the proposed development on the integrity of European sites; and
- Whether other material considerations outweigh any harm identified such as to justify the development.

Reasons

Whether in a suitable location

9. The site comprises an open, undeveloped parcel of agricultural land with mature tree belts and hedgerows to its boundaries. The site abuts Henfield's built area, with a modern housing estate to the immediate west at Charlwood Drive and a row of detached dwellings fronting onto Furners Lane to the south. Open fields extend beyond the site to the east and north and therefore the site forms a part of a wider, rural landscape. The site lies outside the Built-up Area Boundary (BUAB) as defined by Policy 1 of the Henfield Neighbourhood Plan 2021 (HNP)[1] and therefore is within the countryside for planning purposes.

10. Policy 2 of the Horsham District Planning Framework 2015 (HDPF) seeks to maintain the district's unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment. It allows for growth in accordance with the identified settlement hierarchy and supports the sustainable development of settlements of an appropriate scale which retains the existing settlement pattern and enhances natural environmental resources, including landscape character.

11. Henfield is a 'tier 2 settlement', as indicated by the development hierarchy at HDPF Policy 3. These settlements offer a good range of services and facilities, strong community networks, local employment provision, and reasonable public

[1] p23, Policy Map 1a - Henfield Built-up Area Boundary and Sites, Henfield Neighbourhood Plan 2021

transport services. The site is in an accessible location, close to High Street services, the primary school, and bus stops.

12. However, criterion P1.2 of HNP Policy 1 supports development proposals outside of the BUAB only where it conforms with relevant national policies and HDPF policies for development in the countryside. HDPF Policy 26 seeks to protect the countryside against inappropriate development by limiting development outside BUABs to types with an essential need for a countryside location, such as to support agriculture, forestry, mineral extraction, waste disposal, recreation, and the to enable the sustainable development of rural areas. It is not demonstrated that the proposed development has an essential need for a countryside location.

13. HDPF Policy 4 also enables development outside BUABs to support the growth of settlements to meet identified development needs. It is agreed by the main parties that the level of expansion is appropriate to the scale and function of the settlement; the proposal would meet local housing needs; the impact of the development individually or cumulatively would not prejudice comprehensive long-term development; and the development would be contained within an existing defensible boundary and landscape character features would be maintained and enhanced[2]. Therefore, the proposal would satisfy criteria 2 to 5 of Policy 4. However, whilst the site adjoins the existing settlement edge, it is not allocated by the development plan. For this reason, the proposal fails to comply with criterion 1 and thus would conflict with HDPF Policy 4.

14. Whilst it did not consider the scale of impacts to be of sufficient magnitude to justify a reason for refusal, the Council nonetheless identified localised, residual medium adverse effects to medium/minor adverse effects on landscape and visual receptors. In addition, the Agricultural Land Classification report identifies 72.4% of the site as ‘best and most versatile agricultural land’. Therefore, the adverse effect of siting the development in the proposed location would be the modest loss of countryside resources which would not be justified within the parameters of the policies of the development plan.

15. As set out above, the policies of the development plan do not positively favour development in the proposed location. Therefore, having regard to the local development strategy, namely HDPF Policies 2, 4 and 26, and HNP Policy 1, the proposed development would not be in a suitable location.

Provision of affordable housing and infrastructure

16. Schedules 2 and 3 of the s106 agreement contains planning obligations relating to the provision of affordable housing, including the submission of an affordable housing scheme. The planning obligations would secure the provision of on-site affordable housing of an agreed tenure mix to meet an identified housing need and would include provision for the nomination of the affordable rented units and measures to ensure the appropriate disposal of the units. In the event the appellant is unable to reach agreement with an affordable housing provider, the obligations place a duty on the Council to assist in securing a provider and/or agree a change to the mix of affordable housing types. Such provisions are necessary to secure the provision and delivery of affordable housing in accordance with HDPF Policy 16, and guidance contained within the Planning Obligations and Affordable Housing Supplementary Planning Document.

[2] Paragraph 7.12 of Statement of Common Ground, April 2026

17. For developments of the scale and type proposed, HDPF Policy 16 requires 35% of dwellings be affordable housing. Since this requirement applies to a proportion of the proposed units, it is directly related to the development. However, the obligation would secure affordable housing at a rate of 45% thereby exceeding the policy requirement. This higher rate of provision would contribute toward an identified unmet need for affordable housing units and therefore is justified in planning terms. Moreover, the appellant has not suggested that the required level of affordable housing cannot be viably delivered by the development, therefore the obligation would be fairly and reasonably related to the development in scale.

18. Schedule 4 of the s106 agreement concerns the provision and management of open space and requires submission of details of the provision of open space, Local Area of Play and/or Local Equipped Area of Play, and details of their specifications and management. The planning obligations also require the establishment of a management company and a financial contribution be paid to the parish council for future maintenance in the event open spaces are transferred to its ownership.

19. Open spaces enhance amenity areas and support the recreation needs of future residents of the development and must be appropriately maintained throughout the lifetime of the development. Therefore, the provision and long-term management and maintenance of open spaces over the lifetime of the development, is required to meet the requirements of HDPF Policy 32, which seeks to secure a framework of high-quality open spaces which meets the identified needs of the community, and is thus necessary to make the development acceptable in planning terms.

20. Whilst the extent of open space provision is not defined at this time, it would be agreed through the approval of the open space specification and consideration of the layout of the development at the reserved matters stage. Therefore, I am satisfied the consideration of open space as a reserved matter would ensure this provision is directly and reasonably related in scale and kind.

21. Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that, unless exempt, every development must achieve at least a 10% uplift in biodiversity value. Every planning permission is deemed to be granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted and approved.

22. Schedule 5 of the s106 agreement includes planning obligations to ensure the delivery of BNG through the submission of a Biodiversity Gain Plan and HMMP. The obligations would ensure the Habitat Creation and Enhancement Works set out in the HMMP are retained and maintained and includes a financial contribution for long-term monitoring of the BNG works, with procedures for enforcement against any identified breach of the HMMP. Since the monitoring and management of BNG for a 30-year period is mandated by legislation, the obligations are necessary to make the development acceptable.

23. The proposal includes off site highways works which comprise parking improvements to a layby and pedestrian crossings at identified locations. These works are secured by the planning obligations set out schedule 6 of the s106 agreement. These improvements are required to mitigate the impacts of the proposal on the local road network to maintain highway safety, and to ensure the

development achieves an integrated community connected by a sustainable transport system and manages anticipated growth in demand for travel as required by HDPF Policy 40.

24. The planning obligations at schedule 6 of the s106 agreement secure the submission of a Travel Plan, the appointment of a Travel Plan co-ordinator and a contribution for a Travel Plan Monitoring fee. As set out in the Planning Policy Guidance, "Travel Plans, Transport Assessments and Statements are all ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements"[3]. For a scheme of this size, a travel plan is a statutory requirement. Securing the provision of a travel plan through a planning obligation ensures it operates in tandem with the contribution for the ongoing monitoring of the data by the County Council. Therefore, I am satisfied the planning obligations relating to the Travel Plan constitute a reason for granting planning permission and meet the tests of the CIL regulations.

25. Signatories of the s106 agreement include the landowners, appellant, the District Council, and the County Council, and therefore the obligations would be binding on all relevant parties and the s106 agreement would be effective and enforceable in securing the provision of necessary affordable housing and infrastructure. The parties consider the planning obligations would comply with paragraph 122 of the CIL regulations[4]. I have no compelling evidence to the contrary and, as discussed above, I am satisfied the planning obligations would be necessary to make the development acceptable in planning terms and are otherwise compliant with the CIL regulations. In addition, the Council operates a Community Infrastructure Levy (CIL) to fund strategic infrastructure, and this levy would apply to the proposed development. Consequently, the proposal demonstrates the development would make suitable provision for affordable housing and other infrastructure.

26. The proposal therefore complies with HDPF Policies 16, 31 and 39 which together require development provide a mix of housing tenures to meet the needs of the district's communities, contribute to the enhancement of existing biodiversity, and secure new or improved infrastructure in accordance with required standards.

Integrity of European sites

27. The site is within the Sussex North Water Supply Zone and (SNWSZ) and therefore has a functional relationship with the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA), and Ramsar site, which are European sites afforded protection under the Conservation of Habitats and Species Regulations 2017 as amended (the Habitat Regulations).

28. The qualifying features of the SPA and SAC are its assemblage of waterfowl including Bewick's swan, shoveler, teal, wigeon, and populations of little whirlpool ramshorn snail. The qualifying features of the Ramsar site include its waterfowl assemblage and seven threatened wetland invertebrate species, including endangered pseudamnicola confusa. The site also supports four nationally rare and four nationally scarce plant species. The ditches intersecting the site have a particularly diverse and rich flora. The site supports all five British duckweed

[3] Planning Practice Guidance Paragraph: 002 Reference ID: 42-002-20140306
[4] Paragraph 1.7 of s106 agreement

species, all five water-cress species, all three British water milfoils species, six British water dropwort species, and two-thirds of British pondweeds.

29. The conservation objectives for the SAC and SPA are to ensure the integrity of the site is maintained or restored as appropriate and ensure the site contributes to achieving the aims of the Wild Birds Directive by maintaining or restoring the extent and distribution, structure and function, and habitats of the qualifying features and the population and distribution of qualifying features within the site.

30. At time of the Council's decision, Natural England's substantive advice (Position Statement Interim Approach, September 2021) indicated that it cannot be concluded with certainty that existing abstraction within the SNWSZ does not have an impact on the Arun Valley sites, requiring development within this zone not add to this impact. Therefore, development which would increase demand for water resources within the SNWSZ was considered to result in likely significant effects on the Arun Valley SAC/SPA/Ramsar site either alone or in combination with other developments in the SNWSZ. However, on 31 October 2025, Natural England formally withdrew the September 2021 Position Statement.

31. The Withdrawal Statement confirms a package of measures have been agreed between Natural England, the Environment Agency, and Southern Water. Notably, the measures include a voluntary reduction by Southern Water to their Hardham abstraction licence to cap abstraction to the level which reflects actual recent historical abstraction and removes additional headroom ensuring that new development will not add to existing pressures to water levels on the sites. This decouples abstraction from new development preventing additional pressure on Arun Valley water resources.

32. Therefore, whilst the additional population associated with the proposed development would increase demand for water use in the SNWSZ, this would not result in adverse impacts associated with abstraction. Consequently, through its Withdrawal Statement, Natural England advise the proposed development would not have likely significant effects on the integrity of the Arun Valley sites, either alone or in-combination with other development.

33. However, in its letter, dated 10 November 2025, Natural England acknowledges the Council's view that further information is required before it can be satisfied that the agreed package of measures can be sufficiently secured and proven to be effective in practice.

34. Prior to Natural England withdrawing their September 2021 Position Statement, affected local authorities within the SNWSZ were jointly producing a water offsetting scheme, the Sussex North Water Certification Scheme ("SNWCS"), to utilise demand capacity generated by Southern Water efficiency savings and other water saving projects. The SNWCS was designed to use mains water capacity generated by Southern Water from improved leakage reduction, and household and non-household demand reduction. This capacity was some 3.24 megalitres per day, sufficient to ensure mains water to 7,066 new dwellings. Natural England has previously reviewed and agreed the Southern Water efficiency savings figures.

35. To ensure development makes efficient use of water, HDPF Policy 37 requires water consumption be limited to 110 litres per person per day (l/p/d). Details of fixtures and fittings, set out in Technical Note 1: Water Neutrality Statement

November 2024 demonstrates total daily water usage would meet the 110l/p/d target. This provides certainty regarding the development's total water usage.

36. The SNWCS has been paused following Natural England's withdrawal of its September 2021 Position Statement. However, the additional capacity created remains available. The Council monitors new development granted planning permission and additional water consumption since the withdrawal of the Position Statement. The water usage of the proposed development would be accommodated within the additional capacity generated by Southern Water's efficiency measures.

37. Consequently, irrespective of mitigation package discussed above, the identified additional available mains water capacity would ensure that the proposed development would not lead to an increase in water abstraction within the SNWSZ.

38. Natural England's letter confirms it supports the Council's approach of monitoring planning permissions granted within the SNWSZ to ensure the available capacity referred to is not exceeded. In this instance, it is not necessary to consult Natural England whose position and advice in respect of matters of water scarcity within the SNWSZ are clearly set out in its Withdrawal Statement 31 October 2025 and its letter to Horsham District Council, 10 November 2025.

39. As set out above, with the imposition of a planning condition to secure water efficiency within the development, and through utilising mains water capacity generated from efficiency savings, the proposal demonstrates it would not increase water abstraction with the SNWSZ. Moreover, the package of measures identified in Natural England's Withdrawal Statement prevents development pressure on Arun Valley water resources. Therefore, there is certainty the proposal would not have likely significant effects on the Arun Valley SPA, SAC, Ramsar, and thus would not harm the integrity of these European sites.

40. The proposal would satisfy the Habitat Regulations which require permission only be granted after having ascertained that it will not affect the integrity of European sites and would meet the duties under s40 of the NERC Act 2006 (Priority habitats & species). The proposal would therefore comply with HDPF Policy 31 which requires development contribute to the enhancement of existing biodiversity, affords particular consideration will be given to the hierarchy of sites and habitats, and requires appropriate mitigation and compensation measures be provided.

Other considerations

41. The proposal would contribute 191 dwellings to the area's housing stock. It is agreed by the main parties that the delivery of the proposed market housing should be afforded at least very significant weight.

42. The provision of affordable housing provision would exceed the minimum policy requirement and would achieve a rate of 45%. The main parties agree that the affordable housing provision should attract at least very significant weight.

43. The main parties also agree that the provision of on-site open space and play facilities carries at least moderate weight.

44. In addition, there would be moderate social and economic benefits through increased footfall for existing local services and facilities from future occupants of the development, direct provision and financial contributions toward local

infrastructure improvements secured through planning obligations and CIL, and creation of jobs and training opportunities during the construction phase. Furthermore, there would be a moderate uplift in biodiversity value through BNG.

Other Matters

45. The Parameters Plan[5] illustrates broad principles of the potential site layout. The scheme would achieve a density of 35 dwellings per hectare which is comparable to the scale of the existing residential development to the west. Therefore, the quantum of development proposed would be accommodated within the site with a layout and density that reflects the character of the surrounding area.

46. In addition, the Parameters Plan suggests areas of residential development would be set back from the boundaries. The extent of separation between existing dwellings and the proposed development would be sufficient to avoid loss of privacy, light, and outlook, or exposure to noise. However, to avoid disturbance to occupants during construction, and to maintain the quality of the local environment including air quality, a Construction Environment Management Plan would be secured through a planning condition.

47. Some local residents use the site for recreational walks along its edge. The site is in private ownership, and the proposal would not affect the public right of way network or availability of public open space, since no such routes or designations apply to the site.

48. Many respondents expressed concern the proposal would adversely affect highway safety for pedestrians and road users through increased traffic and congestion on connecting estate roads and High Street, which experience on-street parking, and visibility and capacity constraints. Following the development, all junctions assessed within the Transport Assessment December 2024 (TA) are expected to operate comfortability within capacity and with minimal queuing, across all scenarios. In addition, the TA's highway link impact assessment establishes the level of development traffic that would route to or through the High Street as a proportion of the background traffic and shows that peak hour development traffic would be within typical daily variations in background traffic. The TA notes that on-street parking occurs in various locations between the junctions with London Road and Charlwood Drive but found this helps to ensure vehicle speeds remain low along this stretch of road and approaching the site. Consequently, the TA concludes the proposed development would have a negligible impact on the local highway network.

49. In addition, concerns were raised regarding the proximity of the proposed junction to the existing access at no 6 Charlwood Drive. During the Council's determination the junction design was revised, including the geometry of the radius on the western side. In its response dated 01 May 2025, West Sussex County Council, the local highway authority, advises the site access layout would be acceptable.

50. As discussed above, a travel plan and highway works would be secured by the s106 agreement. This would provide pedestrian connectivity for all users with provision of dropped crossing points and tactile paving, and the proposed emergency access would also serve as a route for pedestrians and cyclists.

[5] Drawing no. PL-03 Rev D

51. I have had regard to the advice of the local highway authority, which confirms it is satisfied the development proposals accord with relevant policy requirements set out within the National Planning Policy Framework (the Framework), and that the proposal would not result in any severe or otherwise unacceptable safety impacts, and subject to conditions and obligations raises no objection to the scheme. Furthermore, a condition to secure demolition and construction details would ensure the movements of construction vehicles would not harm highway safety.

52. The site is within Flood Zone 1, i.e. at lowest risk of flooding, and Environment Agency mapping indicates the site is not subject to surface water flood risk. Conditions would ensure the development is constructed in accordance with the Flood Risk Assessment and sustainable drainage system scheme. I have had regard to the advice of West Sussex County Council, the lead local flood authority, which confirms that, subject to conditions, it has no objection to the proposal. It is therefore demonstrated the proposal would not increase flood risk on or off site.

53. Concerns were also raised regarding the cumulative effects of the proposed development on other infrastructure including the capacity of electricity and sewerage networks and the availability of local services and employment opportunities. There is no substantive evidence before me that there would be harm in respect of these matters, and no objection has been raised by the Council or statutory consultees. Therefore, none of the concerns raised provide a compelling reason why planning permission should not be granted. The development would contribute toward the provision of strategic infrastructure such as policing and education, through its payment of CIL.

54. The site comprises arable land bounded by hedgerows, with small areas of modified grassland and forbs. The Ecological Appraisal November 2024 indicates the hedgerows are the only on-site habitat of ecological importance. Whilst small sections of hedgerow would be removed to facilitate access, this would be compensated by new, native species-rich hedgerow planting, and the loss of remaining habitat would be of negligible significance.

55. Common lizard and slow worm were recorded on site, and the Ecological Appraisal indicates the site provides some roosting, foraging and commuting opportunities for bats and nesting birds. However, it concludes the site generally offers limited opportunities for protected species. In addition, the Dormouse Technical Note 02 provides further assessment of the site's suitability for the likely presence of hazel dormouse and no evidence attributable to dormouse was recorded. The delivery of proposed mitigation and compensatory measures would be secured through planning conditions, including the requirement for a Biodiversity Enhancement Strategy and wildlife-friendly lighting strategy, to minimise the risk of harm to any protected species present and maintain or enhance the conservation status of local populations.

56. The site is within an amber impact risk zone for great crested newts, and suitable habitat is present in the surrounding landscape. The Ecological Appraisal found that great crested newts are likely absent from the site due to the suboptimal habitat and negative eDNA results. However, great crested newts may migrate across arable land and may utilise cracks and crevices for rest and shelter. Consequently, the development must follow reasonable avoidance measures to minimise the risk to great crested newts secured by a condition requiring a Precautionary Working Methods Statement.

57. The Council's consultant ecologist advises there is sufficient ecological information available to support the application. Subject to conditions, the proposal would not have an unacceptable impact on protected species and their habitats.

58. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended (LBCA Act) requires I have special regard to the desirability of preserving listed building, their settings and any features of special architectural or historic interest which they possess. The Built Heritage Statement November 2024 notes the site lies 219m north of Grade II listed building, Backsettown[6], and the Design & Access Statement identifies a further six listed buildings to the southwest of the site at London Road and Furners Mead.

59. Backsettown dates from the 16th-century or earlier and is an L-shaped, timber-framed building with red brick infilling. The south-east wing is the older portion which contained the hall and the front of the west wing and south-east wing have been refaced with red brick, grey headers and red mathematical tiles. The Built Heritage Statement indicates the site makes only a very low contribution to the significance of the Backsettown as an essentially unappreciable element of its agricultural landscape context.

60. The south wing of Grade II* listed Wantley Manor, London Road[7] contains a medieval hall. The east wing was later converted into outhouses, and the west wing is now hidden by an 18th century addition. The timber framing is exposed in some places but has mostly been refaced with red brick or tiles on a cemented or brick base. The roof was originally of Horsham slabs but has mostly been refaced with tiles, one section being pantiles. It comprises two storeys, with three windows to each wing. In the 18th century, the west wing was doubled by a portion facing the road. This has two storeys and three windows and is faced with red mathematical tiles, modillion eaves cornice, and hipped Horsham slab roof.

61. Grade II listed Traddles, 5, London Road[8] dates from the 18th century or earlier. It has two storeys faced with tiles, a tiled roof, casement windows, and projecting shop front. Grade II listed, 6 London Road[9] is an early-19th century, two-storey building with painted brick, overhanging eaves, slate roof. It has two small bays on ground floor and a contemporary shop window with glazing bars. Grade II listed Gull Cottage, 8 & 9, London Road[10] dates from the 17th century or earlier, but re-fronted in the 18th century. It has two storeys, with no 8 faced with painted brick at ground floor and tile-hung above. No 9 is faced with grey headers with red brick dressings, quoins, modillion stringcourse and eaves cornice.

62. Grade II listed Redbarn, London Road[11] is a 17th-century or earlier, two-storey, timber-framed building with some timbering exposed at the back, with a tiled roof, casement windows, and doorways with pediment-shaped hoods over. Grade II listed nos 1-8 Eastern Terrace, Furners Mead[12] is an early-19th century, two-storey terrace row, with a slate roof, horizontal sliding sash windows, and slate-hung elevations which are unusual in the local area. The significance of these buildings is derived from their architectural and historic interest.

[6] List entry no. 1027392
[7] List entry no. 1027376
[8] List entry no. 1286429
[9] List entry no. 1353985
[10] List entry no. 1027375
[11] List entry no. 1353986
[12] List entry no. 1286615

63. In addition, section 72(1) of the LBCA Act requires that, with respect to any buildings or other land in a conservation area, I pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Henfield Conservation Area (CA) lies to the southwest of the site. The site is outside the CA and does not contribute to how it is experienced or understood.

64. Existing residential development between the site and the CA and listed buildings provides physical and visual separation, and there is no known historical or functional relationship between the site and the listed buildings or any built heritage asset within the CA. Therefore, the development would have a neutral effect upon, and thus would preserve the listed buildings, their settings, and the character and appearance of the CA. I have also had regard to the advice of the Council's Conservation Team who conclude the development is unlikely to have a significant impact on the setting of these assets. For these reasons, I am satisfied the proposal would not harm heritage assets and would comply with the requirements of the LBCA Act.

65. I have no substantive reason to consider the community engagement carried out in respect of the application was anything other than compliant with the regulations.

Planning Balance

66. Since the HDPF is more than five years old, paragraph 78 of the Framework requires the Council identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their local housing need, rather than against the target set by the HDPF. In addition, as the latest available Housing Delivery Test (HDT) measurement[13] indicates past delivery in the Council's area was substantially below the housing requirement, paragraph 79 of the Framework requires a 20% buffer be applied to the identified supply. Set against the total housing requirement, the Council's Authority Monitoring Report December 2025 demonstrates a 1.7 years' supply of housing land. Therefore, within the Council's area there is a significant shortfall in the supply of housing.

67. In this circumstance, paragraph 11(d) of the Framework is engaged, whereby planning permission should be granted unless (i) policies in the Framework that protect areas or assets of particular importance provide a strong reason for refusing the development, and (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the 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.

68. I have found the proposal would not have likely significant effects on the integrity of European sites either alone or in combination with similar development. Consequently, the proposal would not conflict with the Framework's policies that protect areas or assets of particular importance, and therefore Framework paragraph 11(d)(i) does not provide a strong reason for refusing the development. This absence of harm is a neutral factor in the planning balance.

[13] Housing Delivery Test 2023, published 12 December 2024

69. Paragraph 232 of the Framework requires due weight be given to existing policies, according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). As set out above, I have found the proposal would conflict with HDPF Policies 2, 4 and 26, and HNP Policy 1.

70. As discussed, the proposal would result in a loss of countryside commensurate in scale with the area of the site, with localised residual medium to medium/minor landscape and visual impacts and a loss of best and most versatile agricultural land. Paragraph 187 of the Framework recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land. Therefore, there is some synergy between the development plan policies and paragraph 187 of the Framework through the general protections applied to the countryside.

71. However, the Council's Shaping Development in Horsham District Planning Advice Note 2025 (SDPAN) recognises the HDPF's housing target can no longer be used for calculating housing land supply and expects development proposals will come forward in locations not supported by the development plan. Whilst the SDPAN does not reduce the statutory weight of the development plan, it sets out how the Council will support development to meet identified needs and other objectives. Therefore, there would be an expectation that the SDPAN would be applied in decision-making and the SDPAN forms a material consideration in my decision.

72. Paragraph 5.12 of the SDPAN sets out criteria which development proposals are expected to meet. These broadly reflect criteria 1 to 5 of HDPF Policy 4 but crucially, omits the requirement for the site to be allocated by the development plan. Concerns were raised that the proposal would set a precedent for development in unplanned locations. However, a function of the SPAN is to enable development to come forward on unallocated land outside BUABs where opportunities for development would normally be restricted by HDPF Policy 26. The main parties agree the appeal scheme is consistent with each of the requirements of paragraph 5.12, and thus compliant with this guidance[14].

73. Therefore, taking account the degree of consistency with the Framework and having regard to the SDPAN, the conflict between the appeal proposal and HDPF Policies 2, 4 and 26 carries only modest weight against the proposal. However, the conflict with HDPF Policy 26 would, by extension, result in conflict with a policy contained within a neighbourhood plan, HNP Policy 1.

74. The Framework states the planning system should be genuinely plan-led[15] and the Written Ministerial Statement of 27 Feb 2025[16] asserts that "the plan-led approach is, and must remain, the cornerstone of our planning system". Through neighbourhood planning, the planning system seeks to provide communities the power to develop a shared vision for their area[17]. Representations from the Council, Parish Council, and residents express a perception that Henfield has contributed its share of the area's development needs and convey significant concerns that the proposed development would undermine the HNP and wider

[14] Paragraph 7.14, Statement of Common Ground April 2026
[15] Paragraph 15, National Planning Policy Framework
[16] Local Plan Making and Guidance, Volume 762: debated on Thursday 27 February 2025
[17] Paragraph 30, National Planning Policy Framework

plan-led system and materially weaken the legitimacy of local and neighbourhood-level plan-making. Whilst this effect is somewhat abstract, it nonetheless represents a harmful consequence of the proposed development.

75. The Framework's presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making but recognises the application of the presumption has implications for the way communities engage in neighbourhood planning[18]. Consequently, paragraph 14 advises that:

"In situations where the presumption at [Framework] 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 (see [Framework] paragraphs 69-70)."

76. The HNP was made by the Council on 23 June 2021 and is approaching its fifth anniversary. Since the HNP became part of the development plan less than five years from the date of my decision, the test at Framework paragraph 14(a) is met.

77. The HNP identifies a housing requirement figure of 270 dwellings for the neighbourhood area. HNP Policy 2 provides four site allocations, of which the Council has resolved to grant planning permission for 264 dwellings and is assessing an application for 9 dwellings. In addition, a further 23 dwellings have been consented on windfall sites during the plan period. The HNP policies and allocations has, to date, made provision for 283 dwellings, thereby exceeding the HNP's requirement. Therefore, the test at Framework paragraph 14(b) is met.

78. However, as concluded by the Inspector in an appeal decision for 70 dwellings in Melksham, Wiltshire[19], Framework paragraph 14 is not absolute. It does not place a firm bar against development going ahead even if counter to a neighbourhood plan that meets the paragraph 14 tests. Rather, paragraph 14 requires the decision-maker exercise judgement as to whether conflict with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits.

79. In the Melksham case, the Inspector concluded that whilst the neighbourhood plan contained policies and allocations, the validity of the housing requirement figure could not be relied upon. This tempered the weight the Inspector afforded to the housing requirement[20]. Furthermore, in an appeal decision for 250 dwellings in Faversham, Kent[21], the Inspector concluded that whilst the neighbourhood plan became part of the development plan within the past five years, it contains policies and allocations that would meet a housing requirement that does not accurately reflect up-to-date housing need. In this circumstance, the Inspector concluded the adverse impacts of the conflicts with the neighbourhood plan do not significantly and demonstrably outweigh the benefits[22].

[18] Paragraphs 12 & 13, National Planning Policy Framework
[19] Appeal Ref: APP/Y3940/W/25/3374421, Land off Woodrow Road, Melksham, Wiltshire, SN12 7AY
[20] Paragraph 42 of appeal decision APP/Y3940/W/25/3374421
[21] Appeal Ref: APP/V2255/W/24/3350524, Land at Ham Road, Faversham, Kent ME13 7TX
[22] Paragraph 103 of appeal decision APP/V2255/W/24/3350524, Land at Ham Road, Faversham, Kent ME13 7TX

80. Paragraph 69 of the Framework requires strategic policies set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development. HDPF Policy 15 makes provision for the development of at least 16,000 dwellings or an average of 800 dwellings per annum over the period 2011-2031. Of this total, Policy 15 requires at least 1,500 dwellings be allocated through neighbourhood planning.

81. The Housing Needs Assessment, Aecom 2017 (HNA) identifies five data sources which informed the housing requirement. However, the HNA explains that explicit guidance was received from the Council that the housing target for the neighbourhood area should be taken from the HDPF's 1,500 dwelling requirement for neighbourhood plans[23]. To estimate the housing requirement, the HNA took an average of its data sources but, to ensure consistency with the HDPF's dwelling target for neighbourhood plans, a higher figure derived from the district minimum requirement was excluded and a nil rate predicated on an assumption that projected growth for the area had been met was retained. This suppressed the housing requirement below other objective data sources.

82. The HNP Examiner's Report 2020 highlights the relationship between the HNA's housing requirement and HDPF. At paragraph 6.30, the examiner notes the approach set out in the HNA was recommended by the Council to identify their proportion of the wider 1,500 dwelling target for neighbourhood planning, and at 6.34, explains advice received from the Council that the HNP's housing requirement represents an appropriate, sustainable and important proportion of the 1,500-dwelling figure. At paragraph 6.35, the examiner concluded the HNP's housing requirement reflects the most recently available planning strategy of the Council. Consequently, the HNP's housing requirement is intrinsically linked to, and indivisible from the HDPF's development strategy.

83. As set out in the Statement of Comon Ground (SoCG), the Council's annual housing need has significantly increased from the figure set out by HDPF Policy 15, and this target can no longer be relied upon. Within the context of this significant uplift, I cannot consider the HNP's housing requirement to remain a credible indicator of current housing need.

84. Acknowledging the age of the HNP, Henfield Parish Council confirmed it is currently undertaking a review of the HNP. However, it has not approached the District Council to update its housing requirement. The HNP review is at an early stage of preparation, and I have no certainty it will address the shortfall in housing.

85. The appeal site was assessed during the Local Plan review but was not progressed as a preferred allocation. The emerging Local Plan was submitted in July 2024 and examination commenced in December 2024 but was subsequently cancelled following the Inspectors conclusions that the Council had failed to satisfactorily comply with the duty to co-operate. Following the withdrawal of Natural England's September 2021 Position Statement, examination of the emerging Local Plan was resumed, with hearing sessions held in April 2026 and scheduled for late 2026. The Inspector's letter suggests consideration of additional sites may be required and the Council has provided a provisional work programme which indicates previously assessed sites would be revisited. However, given the

[23] Paragraph 27 of Housing Needs Assessment, Aecom 2017

emerging Local Plan's early stage of preparation, the Council accepts its draft policies carry only limited weight.

86. Until recently, delivery of new development in the SNWSZ has been constrained. Whilst the requirement to demonstrate water neutrality no longer applies, I have not been provided evidence to suggest this will lead to a significant improvement in the housing land supply position in the short term.

87. In summary, the HNP is less than five years old and contains policies and allocations to meet its housing requirement. However, significant material changes in circumstances since the HNP was made suggest its identified housing requirement is no longer reliable. Furthermore, the shortfall in housing land supply across the Council's area is not likely to be remedied in the short term, and I anticipate will persist until the emerging Local Plan reaches adoption. Therefore, the weight to be afforded to the proposal's conflict with HNP Policy 1 is diminished.

88. Set against these policy conflicts, within the context of a significant shortfall in the supply of housing and the government's objective to significantly boost the supply of homes[24], the provision of 191 dwellings attracts very significant weight in favour of the proposal. The development would provide a mix of affordable housing with the rate of provision exceeding the minimum policy requirement, thus contributing positively to the Framework's key policy at paragraph 66 and attracting very significant weight in the scheme's favour. In addition, I attach moderate weight to the biodiversity net gain and social and economic benefits identified at 'other considerations'. The benefits of the scheme are therefore of a very high order.

89. In conclusion, the adverse impact of allowing development that conflicts with the HNP is a matter of considerable weight and importance. However, in this circumstance, the adverse impacts of allowing development that conflicts with the local development strategy, including the provisions of the HNP, would not significantly and demonstrably outweigh the benefits of the proposal. As a result, the presumption in favour of sustainable development would apply, and the appeal should be allowed.

Conditions

90. The SoCG includes a list of suggested conditions which I have considered against the Framework's tests. The SoCG confirms the appellant's agreement to all pre-commencement conditions.

91. In the interest of certainty, I have included a condition which specifies the approved plans. This includes plans and drawings relating to the proposed access. Since I have had regard to it in my decision, I have also included a condition which requires the development broadly accord with the principles of the Parameters Plan which illustrates how the development could be accommodated within the site in a manner which satisfies HDPF Policies 32 and 33. I have included condition requiring the protection of important trees and hedgerows on the site in accordance with HDPF Policy 33.

92. Since I am granting outline planning permission, I have included conditions requiring that details of the reserved matters are submitted for approval and specifying the time periods by which the reserved matters application must be

[24] Paragraph 61, National Planning Policy Framework

submitted and development must commence. The reserved matters are appearance, landscaping, layout, and scale.

93. To ensure the development does not result in flooding both on and off site and that all surface water drainage features are adequately protected in accordance with HDPF Policy 42, I have included conditions requiring the development be constructed in accordance with the Flood Risk Assessment and requiring submission of a construction phase surface water management plan, sustainable drainage system scheme for the disposal of surface water, details of the maintenance and management of the sustainable drainage scheme, and a verification report.

94. To conserve protected and priority species during both construction and operational phases of the development and enable the duties under the Conservation of Habitats Regulations and Wildlife & Countryside Act 1981 and s40 of the NERC Act 2006 (Priority Habitats & Species) to be discharged, I have attached conditions requiring submission of a lighting design strategy to prevent disturbance to protected bat species, Biodiversity Construction and Environmental Management Plan, Biodiversity Enhancement Strategy; and requiring all mitigation measures and works be carried out in accordance with the Ecological Appraisal, Dormouse Technical Note, and Non-Licensed Precautionary Method Statement to safeguard Great Crested Newts and their habitats.

95. To maintain the amenity of nearby occupiers and highway safety during construction in accordance with HDPF Policies 33 and 40, I have included a condition requiring submission of demolition and construction details. To safeguard the amenities of adjacent occupiers in accordance with HDPF Policy 33, I have attached a condition specify the days and times when construction may take place. In accordance with fire and safety regulations and HDPF Policy 33, I have attached a condition requiring provision of fire hydrants or stored water supply.

96. To mitigate the impact of the construction and operational phases of the development on air quality, and to sustain compliance with and contribute towards national objectives for pollutants, as required by HDPF Policies 24 and 41, I have included a condition requiring the development be carried out in accordance with a mitigation strategy. To avoid harm to humans, controlled waters or the wider environment and ensure any pollution is dealt with in accordance with HDPF Policies 24 and 33, I have included a condition requiring a preliminary risk assessment be carried out and specifying further steps to be taken in the event contamination or pollution is discovered. For the same reasons, I have included a condition requiring a remediation scheme be implemented prior to occupation.

97. Since the site is of archaeological significance, and to satisfy the requirements of HDPF Policy 34, I have included a condition requiring development be carried out in accordance an agreed programme of archaeological works.

98. To ensure the development meets the communication needs of future occupiers, in accordance with HDPF Policy 37, I have included a condition requiring provision of superfast and full-fibre broadband connectivity.

99. In the interests of visual amenity and nature conservation in accordance with HDPF Policy 33, I have included a condition requiring the development be carried in accordance with an agreed landscape management and maintenance plan.

100. To ensure the development provides safe and suitable access to/from the public highway, I have included a condition requiring the vehicular access and associated works are constructed prior to occupation of the development, and details of the emergency, pedestrian, and cyclist link between the development and Kingsley Square are submitted.

101. To avoid adverse impacts on the Arun Valley SAC, SPA and Ramsar sites in accordance with Policy 31 and Habitats regulations, I have included a condition requiring the development comply with the optional technical standard to limit water use, as required by HDPF Policy 37.

Conclusion

102. For the reasons set out above, the proposal would conflict with the development plan as a whole. However, there are other material considerations which justify a decision other than in accordance with the development plan. I therefore conclude the appeal should be allowed.

E Dade

INSPECTOR

Schedule of Conditions

1. The development hereby permitted shall be carried out in accordance with the approved plans: *Location Plan* PL-01 Rev D 28.06.2024; *Fire Tender Swept Path Analyses* 106205-PEF-XX-XX-D-H-000005 Rev P01 18.11.2024; *Refuse Vehicle Swept Path Analyses* 106205-PEF-XX-XX-D-H-000006 REV P03 14.02.2025; *Proposed Primary and Emergency (Inset) Site Access Arrangements* 106205-PEF-XX-XX-D-H-000004 REV P03 14.02.2025; and *Proposed Primary Site Access Arrangement* 106205-PEF-XX-XX-D-H-000002 Rev P03 27.02.25.

2. The detailed design of the development proposed through Reserved Matters applications pursuant to this outline planning permission shall have regard to, and broadly accord with, the principles set out within the Parameter Plan (no. PL-03 Rev D).

3. The development hereby approved shall adhere to the following requirements in respect of the “reserved matters”:

   (a) Approval of the details of the layout of the development, the scale of each building, the appearance of each building, access to and within the site and the landscaping of the development (hereinafter called “the reserved matters”) shall be obtained from the Local Planning Authority in writing before any development is commenced.

   (b) Plans and particulars of the reserved matters referred to in condition (a) above, relating to the layout of the development, the scale of each building, the appearance of each building, access to and within the site and the landscaping of the development, shall be submitted in writing to the Local Planning Authority and shall be carried out as approved.

   (c) Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission.

   (d) The development hereby permitted shall be begun either before the expiration of 3 years from the date of this permission, or before the expiration of 2 years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

4. Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.

5. No development shall take place until a Biodiversity Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

   (a) Risk assessment of potentially damaging construction activities.

(b) Identification of "biodiversity protection zones".
(c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
(d) The location and timing of sensitive works to avoid harm to biodiversity features.
(e) The times during construction when specialist ecologists need to be present on site to oversee works.
(f) Responsible persons and lines of communication.
(g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
(h) Use of protective fences, exclusion barriers and warning signs.
(i) Details of any lighting required

The approved Biodiversity CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

6. The development hereby approved shall not commence until the following demolition and construction details have been submitted to and approved in writing by the Local Planning Authority. The details shall be limited to the following measures:

(a) Details of site management contact details and responsibilities;
(b) A plan detailing the site logistics arrangements on a phase-by-phase basis (as applicable), including:
    i. location of site compound
    ii. the erection and maintenance of security hoarding,
    iii. location for the loading, unloading and storage of plant and materials (including any stripped topsoil),
    iv. site offices (including location, height, size and appearance),
    v. the anticipated number, frequency and types of vehicles used during construction,
    vi. location of site access points for construction vehicles,
    vii. location of on-site parking,
    viii. locations and details for the provision of wheel washing facilities and dust suppression facilities
(c) The arrangements for public consultation and liaison prior to and during the demolition and construction works – newsletters, fliers etc, to include site management contact details for residents;
(d) Details of any floodlighting, including location, height, type and direction of light sources, hours of operation and intensity of illumination

All demolition and construction activities shall thereafter be carried out in accordance with the details and measures approved. During site clearance, preparation and construction the dust and Air Emission Mitigation measures described on Mitigation During Construction section of the Air Quality Assessment report (RPS, April 2025) shall be adopted.

7. The development hereby approved shall adhere to the following requirements in respect of archaeological works:

(a) No development shall take place until a programme of archaeological work has been secured in accordance with a Written Scheme of Archaeological Investigation which has been submitted to and approved in writing by the Local Planning Authority.
(b) The development hereby permitted shall not be commenced until the archaeological site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under criterion (a) and that provision for analysis, publication and dissemination of results and archive deposition has been secured and approved by the Local Planning Authority in writing.

8. No development shall commence, including demolition pursuant to the permission granted, ground clearance, or bringing equipment, machinery or materials onto the site, until the following preliminaries have been completed in the sequence set out below:
   (a) All trees on the site shown for retention on approved drawing number 'SJA TPP 24226-041a', as well as those off-site whose root protection areas ingress into the site, shall be fully protected throughout all construction works by tree protective fencing affixed to the ground in full accordance with section 6 of BS 5837 'Trees in Relation to Design, Demolition and Construction - Recommendations' (2012).
   (b) Once installed, the fencing shall be maintained during the course of the development works and until all machinery and surplus materials have been removed from the site.
   (c) Areas so fenced off shall be treated as zones of prohibited access, and shall not be used for the storage of materials, equipment or machinery in any circumstances. No mixing of cement, concrete, or use of other materials or substances shall take place within any tree protective zone, or close enough to such a zone that seepage or displacement of those materials and substances could cause them to enter a zone.

   Any trees or hedges on the site which die or become damaged during the construction process shall be replaced with trees or hedging plants of a type, size and in positions agreed by the Local Planning Authority.

9. No development shall commence until a Non-Licensed Precautionary Method Statement for Great Crested Newts has been submitted to and approved in writing by the Local Planning Authority. This shall include, but not be limited to, a presence/absence survey and assessment, mitigation measures, and enhancement measures where necessary. The works shall be implemented in accordance with the approved recommendations and shall be maintained thereafter.

10. Prior to the commencement of the development, a detailed mitigation strategy establishing the on-site measures to improve air quality at both the operational and construction phases shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be written in accordance with the Air Quality & Emissions Reduction Guidance and shall detail the calculated damage costs that will be spent on practical mitigation measures. The approved detail within the strategy shall thereafter be strictly adhered to.

11. No development shall commence until the following components of a scheme to deal with the risks associated with contamination, (including asbestos contamination), of the site be submitted to and approved, in writing, by the local planning authority:
    (a) A preliminary risk assessment which has identified:
        i. all previous uses
        ii. potential contaminants associated with those uses
        iii. a conceptual model of the site indicating sources, pathways and receptors
        iv. Potentially unacceptable risks arising from contamination at the site.

    The following aspects (b) – (c) shall be dependent on the outcome of the above preliminary risk assessment (a) and may not necessarily be required.

    (b) An intrusive site investigation scheme to provide information for a detailed risk assessment to the degree and nature of the risk posed by any contamination to all receptors that may be affected, including those off site.
    (c) Full details of the remediation measures required and how they are to be undertaken based on the results of the intrusive site investigation (a) and a verification plan providing details of what data will be collected in order to demonstrate that the remedial works are complete.
    (d) The scheme shall be implemented as approved.

12. Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the local planning authority.

    The content of the Biodiversity Enhancement Strategy shall include the following:
    (a) Purpose and conservation objectives for the proposed enhancement measures;
    (b) detailed designs or product descriptions to achieve stated objectives;
    (c) locations of proposed enhancement measures by appropriate maps and plans (where relevant);
    (d) persons responsible for implementing the enhancement measures; and
    (e) details of initial aftercare and long-term maintenance (where relevant).

    The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter.

13. The development hereby permitted shall not be occupied/brought into use until there has been submitted to the Local Planning Authority verification that the remediation scheme required and approved under the provisions of condition 11(c) has been implemented fully in accordance with the approved details. Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition 11(c).

14. No part of the development hereby permitted shall be occupied until a fire hydrant(s) to BS 750 standards or stored water supply (in accordance with the West Sussex Fire and Rescue Guidance Notes) has been installed, connected to a water supply with appropriate pressure and volume for firefighting, and made ready for use in consultation with the WSCC Fire and Rescue Service. The hydrant(s) or stored water supply shall thereafter be retained as such.

15. No part of the development hereby permitted shall be occupied until the necessary in-building physical infrastructure and external site-wide infrastructure to enable superfast broadband speeds of a minimum 30 megabits per second through full fibre broadband connection has been provided to the premises.

16. No part of the development hereby permitted shall be occupied until a landscape management and maintenance plan (including long term design objectives, management responsibilities, a description of landscape components, management prescriptions, maintenance schedules and accompanying plan delineating areas of responsibility including areas to be defined as private gardens and other areas such as buffer zones) for all communal landscape areas (including any buffer zones) has been submitted to and approved in writing by the Local Planning Authority. The landscape areas shall thereafter be managed and maintained in accordance with the approved details.

17. Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include photographs of excavations and soil profiles/horizons, any installation of any surface water structure and control mechanism.

18. The development hereby approved shall not be first occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:
    (a) a timetable for its implementation,
    (b) details of SuDS features and connecting drainage structures and
    (c) maintenance requirement for each aspect,
    (d) a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

19. No dwelling shall be first occupied until the vehicular access and associated works have been constructed in accordance with the details shown on the

drawing titled 'Proposed Primary and Emergency (Inset) Site Access Arrangements', drawing number 106205-PEFXX-XX-D-H-00004 revision P03.

20. No dwelling shall be first occupied until plans and details and a timetable for their provision for the emergency/pedestrian/cyclist access between the development and Kingsley Square have been submitted to and approved in writing by the Local Planning Authority. The link once approved shall thereafter be constructed in accordance with the approved details.

21. Prior to occupation, a "lighting design strategy for biodiversity" in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and show how and where external lighting will be installed (through provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

    All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

22. All mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Aspect Ecology, November 2024) and the Dormouse Technical Note 02 (Aspect Ecology, January 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This will include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.

23. Prior to or in conjunction with the submission of each Reserved Matters application for the development hereby permitted, details of a scheme for the disposing of surface water by a means of sustainable drainage system shall be submitted to and approved in writing by the Local Planning Authority in accordance with the approved drainage strategy and discharge rates as contained within the approved Flood Risk Assessment by Calibro Consultants Ltd, 22/01/2025, revision 4. The scheme shall be implemented in full in accordance with the approved details prior to first use of the development. The submitted details shall:
    (a) Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharge from the site via a proposed Sustainable Drainage System and the measures taken to prevent pollution of the receiving surface waters (designed in accordance with The SuDS Manual (CIRIA C753, 2015).
    (b) Demonstrate that the proposed surface water drainage system does not surcharge in the 1 in 1 critical storm duration, flood in the 1 in 30 plus

climate change critical storm duration or the 1 in 100 critical storm duration,

(c) Demonstrate that any flooding that occurs when taking into account climate change for the 1 in 100 critical storm event in accordance with NPPF does not leave the site uncontrolled via overland flow routes

24. The dwelling(s) hereby permitted shall meet the optional requirement of building regulation G2 to limit the water usage of each dwelling to no more than 110 litres per person per day. The subsequently installed water limiting measures shall thereafter be retained.

25. All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment (dated 22/01/2025), this includes all new residential dwellings to have a finished floor level raised a minimum of 150 mm above the surrounding proposed ground level unless otherwise first approved in writing by the Local Planning Authority.

26. No works for the implementation of the development hereby approved shall take place outside of 08:00 hours to 18:00 hours Mondays to Fridays and 08:00 hours to 13:00 hours on Saturdays nor at any time on Sundays, Bank or public Holidays.

END OF SCHEDULE

APPEARANCES

FOR THE APPELLANT:

- Mr Hywel James MRTPI, Director, Nexus Planning
- Mr Hashi Mohamed, Counsel, Landmark Chambers
- Mr Simon Boakes BA (Hons), Company Solicitor, Croudace

FOR THE LOCAL PLANNING AUTHORITY:

- Mr Sam Whitehouse, Senior Planning Officer, Horsham District Council, MSc Spatial Planning
- Mr Jason Hawkes, Principal Planning Officer, Horsham District Council, MA Town Planning

INTERESTED PARTIES:

- Cllr Josh Potts, ward councillor for Henfield
- Cllr Russell Shaw, Henfield Parish Council
- Mr Steve Bailey, Campaign to Protect Rural Henfield
- Ms Tracey Chaplin, resident
- Mr David Martin, resident
- Mr David Haywood, resident

DOCUMENTS

- Shaping Development in Horsham District Planning Advice Note 2025
- Agreement pursuant to section 106 of the Town and Country Planning Act 1990 in respect of Land East of Charlwood Drive, Henfield, West Sussex, with covering statement and CIL compliance schedule

Horsham District Council

Shaping Development in Horsham District

Planning Advice Note

Contents

1. Introduction 4

Horsham District Planning Framework and Local Plan Review 4

Housing Land Supply 4

2. Weight of the HDPF and other documents 6

Horsham District Planning Framework (HDPF)....6

The Horsham District Local Plan 2023-2040 7

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given 8

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) 9

c) the degree of consistency of the relevant policies in the emerging plan to this Framework [NPPF] (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given) 10

Conclusion on weight to be given to emerging Local Plan 10

3. Neighbourhood Plans 11

Emerging Neighbourhood Plans 12

Prematurity 12

4. Water Neutrality 13

5. Shaping Development in Horsham District 14

Pre-application Advice Service 14

Site Allocations....14

Sites identified within the emerging Horsham District Local Plan 2023-2040 15

Locational Suitability and Scale 15

Deliverability 16

Meeting Local Housing Needs 17

Biodiversity 19

Climate Change....20

Transport 21

Design 22

Heritage 23
Employment 23
Retail 24
Infrastructure 25
Gypsies and Travellers 26
Inclusive Communities 26
Appendix 1: Status of Neighbourhood Plans 28
Appendix 2: Sites Identified as housing allocations in Emerging Local Plan 31
Appendix 3: Policies 3 and 4 of the Horsham District Planning Framework 34
Policy 3 34
Policy 4 35
Appendix 4: Sites Identified for Employment use in Emerging Local Plan 36
Appendix 5: Sites Identified for Gypsy and Traveller Accommodation in Emerging Local Plan 37

1. Introduction

Horsham District Planning Framework and Local Plan Review

1.1 Horsham District Council (HDC) adopted its Local Plan, known as the Horsham District Planning Framework (HDPF)[1], on 27 November 2015. The HDPF contains a set of policies and strategic allocations, which are used in the determination of planning applications in Horsham District[2].

1.2 All local planning authorities are required to review and, if necessary, update their Local Plan five years from its adoption[3]. Furthermore, the Inspector who examined the HDPF stated that the Council must commence an early review within 3 years of adoption. As a consequence, HDC commenced its review of the HDPF in 2018, consulting on a Local Plan Review: Issues and Options document that concentrated on matters related to employment, tourism and sustainable rural development. The Council subsequently consulted on a draft version of its Local Plan between 17 February and 30 March 2020[4].

1.3 Though progress of the Local Plan was impacted by changes to national policy and work relating to water neutrality following the receipt of Natural England's Position Statement (see section 4 of this document), the Local Plan was submitted for examination in July 2024, following a Regulation 19 publication period held between 19 January and 1 March 2024.

1.4 Local Plan examination hearings started in December 2024. The remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024. On 22 April 2025 the Council published the Inspector's subsequent Interim Findings Letter[5] which recommended that the Plan be withdrawn, due to his view that the Council failed to satisfactorily comply with the Duty to Co-operate when preparing the Local Plan.

1.5 The Council disagreed with the findings and on 18 August 2025 wrote to the Inspector requesting that he reopen the examination in relation to additional evidence which has come to light in relation to the Duty to Cooperate. As such, the submitted Local Plan remains the Council's emerging plan and the implications of this are discussed, where relevant, in this document.

Housing Land Supply

1.6 The HDPF continues to form part of the Council's development plan. The HDPF sets an annualised housing target of 800 homes to be provided in Horsham District until

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[1] https://www.horsham.gov.uk/__data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf
[2] Excluding the part of Horsham District located in the South Downs National Park
[3] Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
[4] Under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
[5] https://www.horsham.gov.uk/__data/assets/pdf_file/0009/146565/ID08-Inspectors-Interim-Findings-Letter-040425.pdf

2031, to which the housing land supply and housing delivery tests can be measured against. However, given that over five years has elapsed since the HDPF was adopted, the HDPF's housing target can no longer be used for calculating HDC's housing land supply. Paragraph 78 of the National Planning Policy Framework (NPPF) and related advice in the Planning Practice Guidance[6], stipulates that the figure calculated using the Government's standard method for assessing housing need should instead be utilised (along with the any shortfalls in delivery), with an additional buffer of 20% due to the Council's performance against the housing delivery test.

1.7 Section 3 of the Council's Authority Monitoring Report (AMR) 2023/24[7] indicates that HDC can only demonstrate around a one-year housing land supply, less than the five-year supply required by Government. Similarly, it identifies that the Council's performance against the Housing Delivery Test (HDT) is 62% and accordingly, the Council has produced a Housing Delivery Action Plan[8]. The consequences of being unable to demonstrate a five-year housing land supply and HDC's HDT performance are set out in section 2 of this report.

1.8 Because of the circumstances in which the Council finds itself, and notwithstanding the current requirement for all new development to demonstrate that it is water neutral, HDC expects to receive planning applications proposing development in locations and of types not supported by the HDPF, the emerging Local Plan or in Neighbourhood Plans.

1.9 HDC will continue to act in a proactive manner by supporting sustainable development that both delivers the development to meet identified needs and ensures that other objectives are met. To demonstrate this, HDC has produced this document to provide clarity as to its approach and guidance to those who engage with the planning system in Horsham District.

1.10 The remaining sections of this document are structured as follows:

- Section 2 provides guidance as to how much weight may be given to the existing HDPF and the emerging Local Plan
- Section 3 covers Neighbourhood Plans produced by Parish and Neighbourhood Councils in Horsham District
- Section 4 discusses the impact of the Natural England Position Statement regarding water neutrality on planning applications
- Section 5 provides advice as to how the Council will continue to facilitate appropriate development

1.11 This Shaping Development in Horsham District Planning Advice Note updates and supersedes the October 2022 Facilitating Appropriate Development (FAD) document. HDC may seek to withdraw or alter the advice contained within this document to reflect updated legislation, national policy or guidance, or the status of the emerging Horsham District Local Plan 2023-40.

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[6] https://www.gov.uk/guidance/housing-supply-and-delivery
[7] https://www.horsham.gov.uk/__data/assets/pdf_file/0009/146817/3AMR-2023-2024-Chapter-3-Housing.pdf
[8] https://www.horsham.gov.uk/__data/assets/pdf_file/0008/146816/HDC-HDT-Action-Plan-2025.pdf

2. Weight of the HDPF and other documents

Horsham District Planning Framework (HDPF)

2.1 The HDPF sets out the Council's planning policies to be used in the determination of planning applications. Alongside any Neighbourhood Plans produced by communities, it forms the central component of the development plan for Horsham District.

2.2 As explained in Paragraph 2 of the NPPF and in legislation[9], applications for planning permission must be made in accordance with the development plan, unless material considerations indicate otherwise. Such material considerations include national policy and guidance contained in the NPPF and PPG.

2.3 As discussed in the introductory section of this document, the Council is unable to demonstrate a five-year housing land supply and has a Housing Delivery Test performance of 62%. NPPF Paragraph 11, an excerpt of which is shown below, sets out the impact on existing development plan policies in such circumstances:

> *"Plans and decisions should apply a presumption in favour of sustainable development…*
>
> *For decision-taking this means: …*
>
> *d) where there are no relevant development plan policies, or the policies which are most important for determining the application out-of-date[8], 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[7]; 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[9]"*
>
> *[Footnotes taken from NPPF page 6]*
>
> *"7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.*

[9] 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) of the Town and Country Planning Act 1990

8 This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); 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. See also paragraph 232.

9 The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12."

2.4 The above is a key material consideration in applications for housing applications in Horsham District. This is as, in the absence of a five-year housing land supply and/or where Housing Delivery Test performance is less than 75%, Paragraph 11 (and footnote 8) indicates that policies that affect that supply of housing may be considered out-of-date. This has the effect of reducing the weight that may be afforded to such policies and engages the 'tilted balance' where there is an expectation that planning applications for housing should be approved. As explained throughout section 5 of this document, the HDPF policies nevertheless may still carry some weight in decision making.

2.5 As identified in the excerpt, there are exceptions that would disengage the 'tilted balance' and the Council will need to consider NPPF Paragraph 11d)i (and related footnote 7) on a case-by-case basis to see whether such exceptions exists. Importantly, the Council is of the view that the 'tilted balance' would be disengaged if development cannot demonstrate water neutrality in order to protect a designated habitats site – the Arun Valley SAC (see section 4 of this report for more details).

2.6 In addition, just because the 'tilted balance' may be in effect, it does not mean that planning applications will automatically be approved. NPPF Paragraph 11d)ii states that a balancing exercise still needs to take place when determining any application. This exercise will depend on the circumstances of an individual planning application and the judgment of the decision maker as to whether any adverse impacts of granting permission *"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"*.

The Horsham District Local Plan 2023-2040

2.7 As explained in the introductory section, the Council submitted its Local Plan (hereafter referred to as the 'emerging Local Plan' or 'eLP') in July 2024. As set out in section one, the Council has responded to the Inspector's initial findings letter requesting that examination hearings be re-opened.

2.8 Paragraph 49 of the NPPF explains 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 [NPPF] (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)"

2.9 The NPPF is a key material consideration in the determination of planning applications and paragraph 49 is relevant to the amount of weight that can be given to eLP policies. Each criterion is discussed in turn.

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given

2.10 The emerging Local Plan has been submitted for examination and a number of steps have taken place. This includes providing responses to the Inspector's Matters, Issues and Questions (MIQs) and undertaking three days of examination hearings. Following the first three days of hearings, the Inspector cancelled further hearings scheduled for December 2024 and January 2025, and on 7 April 2025 the Council received the Inspector's Initial Findings Letter (IFL) that recommended the Council withdraw the Local Plan from examination due to his view that the Duty to Cooperate had not been met.

2.11 On 18 August 2025, the Council wrote to the Inspector requesting that he revisit his conclusions relating to the Duty to Cooperate by allowing a hearing to take place, including with representatives of neighbouring authorities and consideration of all relevant evidence, particularly given the context of proposed changes to the planning system (including the revocation of the Duty to Cooperate) and local government reorganisation. The Council will not take any actions to consider whether to follow the IFL's recommendation until a response to its letter of 18 August 2025 is received. As such, the examination of the Local Plan remains 'live' and in the context of NPPF paragraph 49, the submitted Local Plan remains the Council's emerging plan.

2.12 It is recognised that at the time of writing, the outcome of the Council's letter is not known. In the event that the Inspector reconsider his initial findings, there would still be a number of steps that would have to be undertaken prior to the conclusion of the Local Plan Examination. This will/could include:

- Examination hearings on different matters
- Undertaking further work on matters identified by the inspector or responding to questions relating to changes or update to national policy.
- Producing and consulting on main modifications to the Plan to respond to issues that arise legislative and/or national policy changes
- Potentially further MIQs and hearings relating to the main modifications

2.13 These matters would take a further period of time to programme and complete. At the time of writing therefore, the Council does not take the view that the eLP is sufficiently advanced to justify great weight to its policies. The weight to policies would however be expected to increase should the examination progress.

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)

2.14 The Regulation 19 Local Plan was made available for representations for a six week period ending on 1 March 2024. 1,636 representations were submitted from over 1,000 groups and individuals. A report was produced that summarises the representations received[10] and identifies reasons for objection (and support). Additionally, examination participants have written responses to the Inspector's MIQs. These are contained on the Council's Local Plan Examination webpage[11] and often add more detail to their objections to particular policies.

2.15 Almost all policies had objections. Whilst some were relatively minor in nature, more significant levels of objection were in relation to a number of elements of the plan. This includes a high volume of objection to the proposed strategic allocations. Similarly, all of the smaller (non-strategic) allocations received objections - albeit there was a wide range of variance in the level of objections.

2.16 With non-site specific policies, there was variance in the amount of opposition, with the greatest levels of opposition seen to the following:

- Strategic Policy 9: Water Neutrality – particularly from the development industry on the need for the policy, the legal basis for our requirements and the imposition of higher building standards than required by legislation
- Strategic Policy 17: Green Infrastructure and Biodiversity – particularly from the development industry in relation to the higher requirements (12%) of BNG than required by legislation
- Strategic Policy 37: Housing Provision – the development industry tended to view that the housing targets were too low, with the opposite view generally coming from local residents/groups.
- Strategic Policy 39: Affordable Housing – generally the view of the development industry was that the proportion required was too high with local residents/groups suggesting the opposite and/or that housing was too expensive generally.

2.17 Modifications to the emerging Local Plan have been proposed, in part, to overcome some of the issues raised. However, it cannot be known at the time of writing as to whether this would be accepted by the Inspector particularly in light of his comments in his initial findings letter which indicate that he had some soundness concerns with the plan. Such matters would continue to need to be scrutinised through the examination process, should it continue.

[10] https://www.horsham.gov.uk/__data/assets/pdf_file/0004/138307/SD11d-Regulation-19-Summary-of-Representations-Appendix-1.pdf
[11] https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Examination-Library

2.18 Given the context, it is not considered that great weight could be given to the policies at this time, on account of there existing unresolved objections to the majority of the policies in the emerging Local Plan.

c) the degree of consistency of the relevant policies in the emerging plan to this Framework [NPPF] (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

2.19 In response to the Inspector's Action Points 1 and 17, the Council produced an analysis of the consistency of the emerging Local Plan policies with the NPPF[12]. Within it, it was concluded that all but one policies was fully consistent with the NPPF. The exception to this was Strategic Policy 37: Housing Provision, where it was noted that the emerging Local Plan was not addressing, fully, housing needs.

2.20 Notwithstanding this, a number of representations where objections to the plan were raised were on the grounds of non-alignment with national policy/NPPF. Given that consistency with national policy is one of the soundness tests to which Inspectors assess Local Plans, it will only be through the examination process that this will be tested and any conclusions can be drawn. Until such time, it is not considered that the work referenced above is on its own sufficient to justify more great weight being afforded to the policies of the emerging Local Plan.

Conclusion on weight to be given to emerging Local Plan

2.21 Taking the above together, the general advice is therefore that although the policies of the emerging Local Plan are likely to be material considerations in relation to specific planning applications, **the weight to be applied to such policies is, at the time of writing, likely to be limited in most cases**. The weight may increase should the examination progress to further stages.

[12] https://www.horsham.gov.uk/__data/assets/pdf_file/0006/143574/Response-to-Action-Point-1-and-17-Appendix-1-Matter-1-Issue-1,-Matter-1-Issue-2,-Matter-2-Issue-1,-Matter-2-Issue-2,-and-Matter-2-Issue-3.pdf

3. Neighbourhood Plans

3.1 Neighbourhood Plans allow local communities to help shape the future of their areas. When 'made' by local authorities the Neighbourhood Plans prepared by Parish Councils and other qualifying bodies become part of the statutory development plan and together with the Local Plan are the starting point for determining planning applications.

3.2 HDC has an excellent record in relation to Neighbourhood Plans and at the time of writing this document, 19 Neighbourhood Plans have been made, with other Neighbourhood Plans being at an advanced stage of preparation[13]. The Council intends to produce a Neighbourhood Plan Guidance Note, which though primarily will be designed to assist Parish Councils and Neighbourhood Forums in preparing Neighbourhood Plans, may be of assistance to applicants and those determining planning applications.

3.3 Neighbourhood Plans form a part of the development plan, however they are not immune from the 'tilted balance' as described in NPPF Paragraph 11d) (see section 2 of this document) and as such, their policies may be considered out-of-date due to HDC being unable to demonstrate a five-year housing land supply. As described in paragraph 2.4 and elsewhere in this document, such policies may still carry some weight in decision making.

3.4 Notwithstanding the paragraph above, Neighbourhood Plans benefit from extra support in national policy where particular circumstances are met, even if a local authority is not able to demonstrate a five-year housing land supply. In the scenario outlined below planning permission is unlikely to be granted where a proposal conflicts with policies in a Neighbourhood Plan. This is outlined in NPPF Paragraph 14, which states that:

> *"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 (see paragraphs 69-70)"*

3.5 It will therefore be necessary at the time of determination of a relevant planning application, for the Council to consider whether the conditions exist that allow NPPF Paragraph 14 to be engaged. A list of Neighbourhood plans, their current status (at the time of writing) and date of adoption, and whether the plans contain allocations is set out in Appendix 1. This will help inform any consideration as to whether paragraph 14 is engaged.

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[13] https://www.horsham.gov.uk/planning/neighbourhood-planning

3.6 Where paragraph 14 is not engaged, the 'tilted balance' would be engaged, reducing the weight to be applied to respective neighbourhood plan policies that relate to the supply of housing. In these instances, the expectation will be that planning applications for housing are approved, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Emerging Neighbourhood Plans

3.7 As with emerging Local Plans, Paragraph 49 of the NPPF (see paragraph 2.8) allows for weight to be given to emerging Neighbourhood Plans. The Council will therefore have regard to any Neighbourhood Plans in preparation when determining applications in relevant areas and assess whether weight should be given to policies in emerging Neighbourhood Plan based on the criteria contained within NPPF Paragraph 49.

Prematurity

3.8 Paragraphs 50-51 of the NPPF explains the circumstances in which it may be possible to refuse an application on grounds of prematurity - i.e. when an application is determined before the adoption of a Local Plan or the making of a Neighbourhood Plan.

Paragraph 50:
"However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:
a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area."

Paragraph 51
"Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process."

3.9 The above excerpts therefore explain that there will be very few applications in which the Council will consider refusing on grounds of prematurity and that it will depend on the size and type of a proposal, as well as the stage in which an emerging Neighbourhood Plan has reached.

4. Water Neutrality

4.1 Horsham District is supplied with water by Southern Water from its Sussex North Water Resource Zone (SNWRZ). The supply is sourced from abstraction points in the Arun Valley, which include sites afforded environmental protection. On 14 September 2021, the Council received a Position Statement from Natural England stating that it cannot be ruled out that the abstraction of water for drinking supplies is having a negative impact on the environmental sites in the Arun Valley. They have therefore advised that any new development must not add to this impact and therefore must not increase the amount of water that is abstracted. Such development is described as 'water neutral'.

4.2 HDC recognise that the need for development to be water neutral is unique to Horsham District and parts of other authorities within the SNWRZ and has published comprehensive information about the subject on the Council's website[14]. Such information includes Natural England's Position Statement, legislative background and FAQs, as well as general advice to applicants. As detailed information will continue to evolve advice is contained online and will be regularly updated to reflect the latest position. Such details are not covered in this document and prospective applicants and other interested parties are advised to check the Council's website for the most-up-to date information.

4.3 Notwithstanding the above and regardless of any other guidance contained within this document, it is the current position that all applications that increase the demand for mains (drinking) water will need to demonstrate that their proposal is water neutral. If an application cannot demonstrate water neutrality, it will not be determined positively.

4.4 The Council is working with partner local authorities, Natural England, Environment Agency and Southern Water to introduce the Sussex North Water Certification Scheme (SNWCS)[15] which can be used by eligible proposals in order to demonstrate water neutrality. Eligibility requirements for accessing SNWCS, as well as information as to how the scheme partners will prioritise applications and further information for applicants is available on the dedicated SNWCS website[16].

[14] https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district
[15] Previously known as the Sussex North Offsetting Water Scheme (SNOWS)
[16] https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/sussex-north-offsetting-water-scheme-snows

5. Shaping Development in Horsham District

5.1 As detailed earlier in this document, HDC acknowledges that it is unable to demonstrate a five-year housing land supply and that in accordance with the NPPF, the presumption in favour of sustainable development is engaged where Water Neutrality can be demonstrated. In part of its commitment to act in a positive way to ensure that local housing needs are met, it has set out below advice to guide applicants in submitting applications that would deliver sustainable and appropriate development. In providing the advice below and elsewhere in this document, the Council is not altering the statutory decision-making framework.

5.2 NPPF Paragraph 232 explains that existing development plan policies should not be considered out-of-date because they were adopted or made prior to the latest NPPF's publication and that due weight should be given to such policies, according to their consistency with the NPPF. Therefore, and notwithstanding that policies relating to housing delivery targets, sites and location of development may be considered out of date and therefore attract reduced weight, other policies within the HDPF and the district's Neighbourhood Plans are broadly up-to-date and compliant with the NPPF. As such it is expected that the policy requirements on most matters, including affordable housing provision, planning obligations, infrastructure and other on-site requirements must still be complied with in order for development to be considered favourably by the Council.

Pre-application Advice Service

5.3 Seeking pre-application advice is considered a best practice approach for development proposals. The Council provides pre-application advice, on a without prejudice basis to any outcome of a full planning application process, and strongly encourages prospective applicants for all types of development to use this service. The service can be used to identify key issues regarding a proposal, highlight what information may be required to support an application and, ultimately, indicate whether a proposal is likely to gain planning permission or not. For larger and more complex proposals, a Planning Performance Agreement (PPA) may be appropriate. Full details are online[17].

5.4 In addition to seeking pre-application advice, the Council encourages applicants to engage with Parish Councils, Neighbourhood Councils and local communities, ahead of the submission of planning applications.

Site Allocations

5.5 Subject to water neutrality being demonstrated, the Council strongly encourages applications on site allocations contained within the HDPF and in Neighbourhood Plans. Applications on such sites have in-principle support, subject to schemes being consistent with other relevant policies and any site specific requirements contained within the relevant allocation policies – such as those that seek to protect important

[17] https://www.horsham.gov.uk/planning/planning-applications/planning-permission-advice-services/pre-application-planning-advice

existing assets in or around a site or those that indicate the acceptable quantum of development for the site.

Sites identified within the emerging Horsham District Local Plan 2023-2040

5.6 The eLP proposes a number of allocations to meet additional 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, as well as existing allocations contained in the HDPF.

5.7 It is the Council's view that the proposed site allocations are based on robust evidence, most notably site assessment work[18] 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. Therefore, the Council would encourage applicants to have regard to site-specific matters identified in relevant eLP, including the quantum of development.

5.8 Such advice is issued in recognition that the eLP Inspector has not indicated any specific concerns with proposed site allocations in his Initial Findings Letter, though concerns have been expressed about whether the overall quantity of homes being planned for was sufficiently high to meet the District's identified housing need, as well as unmet needs arising elsewhere.

5.9 The sites identified for allocation are identified in Appendix 2. Detailed site-specific matters are identified within the draft policies of the eLP[19].

Locational Suitability and Scale

5.10 Policies 3 and 4 of the HDPF set out the Council's development hierarchy and approach to settlement expansion. The policies collectively seek to ensure that development is located in the most sustainable locations, whilst retaining the character and function of the District. Policy 3 categorises the primary settlements of the district into different settlement types based on the characteristics and function of each town and village. Settlements categorised within the development hierarchy (other than unclassified settlements) have a defined settlement boundary, also referred to as a Built-up Area Boundary (BUAB), as depicted on the Policies Map. Policy 4 relates to settlement expansion where there is a defined BUAB.

5.11 These policies are still relevant and relate well to the current settlement form of the district. This is supported by paragraph 20 of the NPPF, which seeks to ensure that strategic policies identify an overall strategy for the pattern and scale of development,

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18 https://www.horsham.gov.uk/__data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf & https://www.horsham.gov.uk/__data/assets/pdf_file/0003/131736/HDC-Reg-19-Site-Assessment-Report-Part-III-Preferred-Smaller-Sites-Dec-2023.pdf

19 https://strategicplanning.horsham.gov.uk/gf2.ti/-/1583938/192184357.1/PDF/-/Horsham%20District%20Local%20Plan%20Regulation%2019.pdf

as well as NPPF paragraphs 83 and 84 that seek to promote sustainable development in rural areas and prevent isolate homes in the countryside, respectively. As such, and as set out in Policy 3 of the HDPF, the Council will generally support applications within BUABs where the nature and scale of development proposed does not affect the settlement's characteristics and function. It is the expectation that applicants will also demonstrate that it has made good use of available land achieves appropriate densities as required by NPPF Paragraph 129.

5.12 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.

Deliverability

5.13 As the Council wishes to improve its housing land supply position, it is conscious of the need to approve sites that are defined in the NPPF as being 'deliverable' and therefore capable of being included in housing land supply calculations from the point a planning application is determined. This is as the glossary to the NPPF explains that:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

5.14 Given the national policy position, the Council's clear preference is for applicants to apply for full planning permission for schemes compliant with the HDPF and this document, indicating their commitment to deliver sites awarded planning permission and helping to improve the Council's housing land supply.

5.15 Notwithstanding the expectation that applications for full planning permissions will be made, the Council recognises that on large and/or complex sites, applications for

outline planning permission may be submitted. In such instances, the Council would prefer hybrid applications that seek full planning permission for part of their proposal (including initial development phases) with an outline application for the remainder of the site.

5.16 To support any form of outline application, relevant supporting information will be requested to demonstrate when development would be expected to be delivered. This will include details relating to land ownership, partnership agreements with developers, phasing plans, timings for the submission of reserved matters applications and any other relevant information, with the Council mindful that the Government may introduce requirements on applicants to provide details about delivery.

5.17 To encourage timely progression of schemes awarded planning permission, and in accordance with Paragraph 81 of the NPPF, the Council may wish to impose conditions that shorten the length of years from date of grant of planning permission by which development must commence, and/or the period within which all reserved matters must be submitted. This will be considered on a case-by-case basis, for example where there is a clear need or agreement that development be expedited.

Meeting Local Housing Needs

5.18 The Council's approach to meeting local housing needs is set out in Policy 16 of the HDPF. This sets out that the latest Strategic Housing Market Assessment – currently the Northern West Sussex SHMA 2019[20] - should be used in establishing the housing mix provided in a new development and that the mix should also take into account established character and density of a site as well as the viability of a scheme. Such principles will still form the basis of decisions on planning applications and applicants are advised to consider the SHMA's findings, as well as local housing needs work supporting a relevant Neighbourhood Plan, when progressing schemes.

5.19 The same policy also sets out affordable housing requirements and is supported by the Planning Obligations and Affordable Housing SPD[21]. It specifies that in schemes that would deliver 15 or more dwellings that the Council will seek 35% of the homes to be affordable, and that on schemes of between 5 and 14 it would seek 20% of the homes to be affordable. On the latter requirement, the Council recognises that to seek affordable housing from housing sites not defined as major development would be inconsistent with national policy[22]. It accordingly no longer seeks affordable housing on schemes of less than 10 homes except where situated in the High Weald National Landscape (which is a designated rural area). The following requirements will therefore apply for market-led residential development outside the High Weald National Landscape:

[20] https://www.horsham.gov.uk/__data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Asessment.pdf
[21] https://www.horsham.gov.uk/__data/assets/pdf_file/0005/66821/Planning-Obligations-and-Affordable-Housing-September-2017.pdf
[22] NPPF Paragraph 65

Table 1: Summary of affordable housing requirements

Number of Homes	Affordable Housing Requirement
1 – 9 homes	**No policy requirement for affordable housing**
10 – 14 homes	20% affordable housing
15 or more homes	35% affordable housing

5.20 Different requirements apply for rural exception sites. HDPF Policy 17: Exceptions Housing Schemes, which is consistent with NPPF paragraph 82 and NPPF Glossary and therefore attracts full weight, sets out criteria for considering such schemes.

5.21 As set out in paragraph 6.8 of the HDPF, the Council seeks 70% of affordable homes to be provided as Social Rent or Affordable Rent units, and 30% as intermediate or Shared Ownership units (or other affordable routes to home ownership)[23]. These figures are as per the recommendation in the Northern West SHMA 2019.

5.22 NPPF Paragraph 66 requires that for major development involving the provision of housing, the mix of affordable housing required should meet identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures. The Council's evidence[24] indicates that a majority of households in need could not afford an affordable rent without claiming benefits, and suggests the Council should aim to secure Social Rented housing as a starting point in Section 106 negotiations – this might particularly focus on larger homes where the affordability gap between market and social rents are greatest. The Council will therefore seek the delivery of social rented homes provided the site and its location is appropriate as informed by local evidence, and where provided this will be considered positively. The balance of affordable tenures will be informed by advice from the Council's Housing team.

5.23 The Council undertook a Viability Study[25] to support the affordable housing policy in the eLP. The report indicates that schemes on greenfield sites that deliver 10 or more homes (gross) or exceed 0.5 hectares, can deliver at least 45% of all homes as

[23] The NPPF Glossary entry for Affordable Housing sets out the different types of affordable housing.
[24] Horsham Social Rented and First Homes Study - https://www.horsham.gov.uk/__data/assets/pdf_file/0012/120171/Social-Rented-Housing-and-First-Homes-Study-2022.pdf
[25] https://www.horsham.gov.uk/__data/assets/pdf_file/0016/104821/210726-HLP-Viability-Assessment_Submission-Version-V1-red.pdf

affordable housing. The viability evidence was based on a tenure split for affordable housing of 70%/30%. The 45% requirement is reflected in Strategic Policy 16 of the eLP, and further strengthens the evidence for such sites to deliver at least 35% affordable housing. The Council encourages strongly applicants to consider the findings of the Viability Study and the wording of the Strategic Policy 16 of the eLP in developing proposals and would consider positively schemes that exceed current policy requirements for affordable homes.

5.24 NPPF paragraph 71 states that mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build. Therefore, when determining planning applications, the Council will give positive weight to proposals that offer a variety of tenures, subject to the qualification in the NPPF paragraph 71, and subject to compliance with relevant development plan policies.

Biodiversity

5.25 Policy 31 of the HDPF, as supported by Strategic Policy 25, contains the Council's approach to green infrastructure and biodiversity. The approach underlines that the Council wishes to protect and enhance the natural assets in the district and aligns with both the Climate and Ecological emergency declared by the Council in June 2023 and the principles of the Council's Green Infrastructure Strategy (2024)[26]. These policies remain consistent with Government policy contained in Chapter 15 of the NPPF and the overarching objectives of sustainable development set out in paragraph 8 of the NPPF.

5.26 In addition to the strong statutory and policy protections for statutory protected sites, protected species and irreplaceable habitats, the Environment Act 2021 increased the Government's commitment to improving the natural environment and biodiversity. As part of this, it made it mandatory for all development, (unless specified as exempt), to deliver at least 10% biodiversity net gain (BNG). Emerging evidence[27] suggesting that 12% BNG would be achievable in most circumstances in the district. The Council would encourage all applicants to achieve higher levels of BNG, and any additional provision would be considered to be a benefit weighing in favour of the scheme. The Council has produced advice[28] in relation to BNG, that applicants are encouraged to have regard to.

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[26] https://www.horsham.gov.uk/__data/assets/pdf_file/0013/132610/Green-Infrastructure-Strategy-January-2024.pdf
[27] Biodiversity Net Gain Thresholds, Site Assessment Study & Green Call for Sites (January 2023): https://www.horsham.gov.uk/__data/assets/pdf_file/0016/121705/Horsham-BNG-Assessment.pdf
[28] https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain

5.27 Significant on-site BNG proposals will need to be secured by legal agreement, and managed and monitored for a minimum of 30 years. Significant in this context is defined as the following:

1) where the overall net change in Biodiversity Units is 0.5 or more; and/or

2) the gain relates to habitats of high or very high distinctiveness (as defined within the Statutory Biodiversity Metric User Guide); and/or

3) in the case of major development, where the gain relates to habitats of medium distinctiveness.

5.28 The Council strongly encourages all development to take a landscape led approach and to consider biodiversity at an early concept and design stage, and all subsequent stages, in accordance with Planning Practice Guidance[29]. It will continue to seek biodiversity enhancements and gains in development exempt from the mandatory requirements in accordance with Policies 25 and 31 of the HDPF and paragraphs 8 and 187 of the NPPF.

5.29 Policy 43 of the HDPF relates to the retention and provision of open space which, when read with Policy 39 of the HDPF relating to infrastructure provision, plays a key role in the delivery of green infrastructure, including biodiversity. By virtue of these policies, development is required to accord with the open space standards set out in the Open Space, Sport and Recreation Review 2021[30]. Guidance on the overlap between the provision of biodiversity net gain and the natural semi-natural open space standard is set out in paragraph 4.3.8 criterion 9 of the Green Infrastructure Strategy.

5.30 In addition to the BNG requirements, the Environment Act 2021 also seeks to introduce a national Nature Recovery Network (NRN), informed by 48 Local Nature Recovery Strategies (LNRSs) led by responsible authorities. West Sussex County Council is the appointed responsible authority for the West Sussex LNRS, the production of which ran alongside the East Sussex and Brighton & Hove LNRS. Therefore, the Council encourages development that makes a positive contribution to biodiversity, including the creation of linkages that enhance or connect priority habitats together particularly where it aligns with the West Sussex LNRS[31]. Proposals will be expected to consider how they can overcome habitat fragmentation and create connected habitats.

Climate Change

5.31 At a meeting of Full Council on 23 June 2023, Horsham District Council declared a Climate and Ecological Emergency. This declaration provides a clear steer for the Council and the Council has committed to the development and implementation of a

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[29] https://www.gov.uk/guidance/biodiversity-net-gain#:~:text=How%20is%20biodiversity,74%2D002%2D20240214

[30] https://www.horsham.gov.uk/__data/assets/pdf_file/0020/104249/Open-Space-Rprt-Jun2021FINAL.pdf

[31] At the time of writing, the West Sussex LNR is not yet published, but a NRN has been mapped in Horsham District via the Wilder Horsham District Initiative. Applicants are encouraged therefore to review the information related to this on the Council's website: https://www.horsham.gov.uk/climate-and-environment/climate-action-across-the-district/wilder-horsham-district/horsham-district-nature-recovery-networks

range of measures[32] that work towards a net zero carbon target, to achieve the national commitment by 2050 and aspires to achieve net zero carbon from its own activities by 2030.

5.32 Legislation is clear that it is a fundamental requirement to combat the causes of climate change and mitigate its ongoing effects. In terms of the NPPF and PPG, addressing climate change is one of the core land use planning principles expected to underpin both plan-making and decision taking. The NPPF emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development and aligns with HDPF policies 35-38 that seek to address the district's contribution to climate change.

5.33 The Council recognises that reforms to the building regulations are being proposed by Government which seek to reduce carbon emissions and increase energy efficiency and that all development will be required to abide by such regulations. However, the Council encourages applicants to go further given the context described, and applicants are advised to fully consider the impacts of climate change from the onset of early design, taking account of the landform, layout, building orientation, massing and landscaping to minimise energy consumption. Sustainable design and construction is also a key mechanism to address climate change, minimising the environmental impact of new development – both during the construction and operation of the development. The Council advises that consideration should also be given to non-carbon and/or low carbon based forms of energy, including heat pumps and /or renewable energy. In addition, sustainable and active modes of transport and forms of movement should be facilitated and actively promoted as an alternative to private car use in order to further reduce carbon emissions.

5.34 When designing schemes, applicants are also encouraged to take account of changes to the climate, with more extreme weather, including high temperatures, drought and intense rainfall, expected to become more prevalent. Given that Horsham District is an area of water stress, measures to reduce water consumption are encouraged, while the provision of green and blue infrastructure is likely to be welcomed as it can reduce the impact of extreme temperatures.

Transport

5.35 HDPF Policy 40 sets out the Council's approach to sustainable transport. In general, the policy expects sustainable and active modes of transport and movement as an alternative to private car use. It makes clear that development will be supported if, amongst other criteria, it is located in areas where there are or will be a choice in the modes of transport available, and is integrated with the wider network of routes, including public rights of way and cycle paths. The policies align with the NPPF and the Council expects them to be embedded in any development scheme. Further, it is expected that proposals will demonstrate accordance with the principles and priorities set out in the West Sussex Transport Plan 2022-2036[33], Local Transport Note 1/20:

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[32] https://www.horsham.gov.uk/climate-and-environment
[33] https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/

Cycle Infrastructure Design[34] and the Horsham Local Cycling & Walking Infrastructure Plan[35] and any subsequent updates to these documents. The NPPF (Section 9) makes clear that transport issues should be considered from the earliest stages of development proposals, whilst HDPF Policy 39 requires that appropriate improvements should be completed prior to occupation of the development or relevant phase.

5.36 Additionally, the Council's approach to cycle and car parking is set out in HDPF Policy 41, which seeks to balance the need for parking whilst ensuring that parking is well located and does not conflict with other uses. West Sussex County Council has produced cycle and car parking guidance for new development[36], which applicants are advised to consider when working up development schemes. Applicants are also referred to the National Design Guide[37] and National Model Design Code[38] for best practice advice on cycle and car parking design.

Design

5.37 The NPPF is clear that good design is a fundamental element in sustainable development and paragraph 139 of the NPPF explains that *"development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design*". The creation of high quality, beautiful and sustainable buildings and places is essential to what the planning and development process should achieve.

5.38 Strategic Policy 32: The Quality of New Development and Policy 33: Development Principles of the HDPF set out the Council's requirements in terms of design and remain up to date. Applicants must consider the relevance of all criteria in relation to their proposal. In terms of Policy 33, applicants must be aware that they may be asked to justify why they do not consider any specific element of the policy is relevant to their application.

5.39 The National Design Guide, National Model Design Code and Guidance Notes for Design Codes[39] illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. They form part of the

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34 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf

35 https://horsham.moderngov.co.uk/documents/s15932/LCWIP%20Appendix%201%20Main%20Document%20October%202020.pdf

36 https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf

37 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

38 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

39 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957207/Guidance_notes_for_Design_Codes.pdf

Government's collection of planning practice guidance and should be read alongside the PPG section on design process and tools[40]. The Council has also produced guidance for those applying for planning permission for home extensions[41]. The Council recommends such guidance, and any subsequent advice, is taken account of when preparing relevant applications.

Heritage

5.40 The NPPF asserts that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance. Such assets include over 1,800 listed buildings and 39 conservation areas. Applicants are encouraged to make use of advice and documentation contained on its webpages relating listed buildings[42] and conservation areas[43], when preparing relevant applications.

5.41 The Council will preserve and enhance its historic environment through positive management of development affecting designated and non-designated heritage assets, and their settings. Applicants must consider the criteria set out in Strategic Policy 34: Cultural and Heritage Assets in addition to paragraphs 212 to 216 of the NPPF.

5.42 As stated in NPPF Paragraph 212, "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."* Therefore, proposals which would lead to substantial harm to, (or total loss of significance of), a designated heritage asset will not be supported unless it can be demonstrated that the substantial public benefits gained would outweigh the substantial harm or total loss of the asset. Proposals which would lead to less than substantial harm to the significance of the heritage asset should be weighed against the public benefits of the proposal and will only be supported where public benefit is considered to outweigh the harm.

Employment

5.43 It is considered the employment policies of the HDPF remain justified and up to date. These policies seek to encourage new employment development and also seek to retain existing premises. The policies are consistent with the NPPF which makes clear planning should positively and proactively encourage sustainable economic development and should meet the economic development needs of the area.

5.44 Notwithstanding the above, in respect of Strategic Policy 8, the former Novartis site is no longer required by the University of Brighton as a new higher education campus.

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[40] https://www.gov.uk/guidance/design

[41] https://www.horsham.gov.uk/planning/planning-applications/planning-permission-for-home-extensions

[42] https://www.horsham.gov.uk/planning/listed-buildings/what-is-a-listed-building

[43] https://www.horsham.gov.uk/planning/conservation-areas/maps-and-character-statements

This means any policy compliant development would need to accord with the sequential test set out in criterion 15 of the policy, taking into account the general design and layout principles set out in the other criteria.

5.45 The Council's most recent employment evidence is set out in the Northern West Sussex Economic Growth Assessments (EGAs) and related documents (Jan 2020[44] [including Appendix 5[45]] and Nov 2020[46]). Importantly, the EGAs identifies Horsham town as the primary settlement for focusing employment development in the district – supporting the approach in the HDPF, including the provisions of HDPF Policy 5.

5.46 The EGAs and site assessment work[47] justified the identification of employment site allocations in the wLP, alongside existing commitments. The allocations are also supported by further site assessment studies. As with residential uses, it is the Council's view that the proposed site allocations were based on robust evidence and are capable of accommodating sustainable development. Such allocations are identified in Appendix 4. For this reason, the Council will consider positively employment proposals (Use classes B2, B8 and E(g)) on sites identified in the wLP, which accord with such evidence. Therefore, the Council would encourage applicants to have regard to site-specific matters identified in the wLP, including the quantum of development.

5.47 The Enterprising Horsham framework[48] outlines the Council's vision and guiding principles to help deliver the aims in the Council Plan. Applicants are encouraged demonstrate how their proposal contributes towards achieving the aims of the Enterprising Horsham framework.

5.48 The Council strongly encourages large scale housing led proposals to make provision for employment uses within such proposals, to ensure that employment opportunities exist within areas of population growth. This is consistent with criteria 3 of HDPF Policy 7.

Retail

5.49 Two HDPF policies relate directly to retail; Policy 12: Vitality and Viability of Existing Retail Centres and Policy 13: Town Centre Uses. Policy 6: Broadbridge Heath Quadrant also deals with the redevelopment of a specific site in the district where out of town retail would be acceptable.

5.50 The approach to retail in national policy and guidance, in the NPPF, the PPG and via the Use Classes Order and permitted development rights, mean the HDPF policies are

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[44] https://www.horsham.gov.uk/__data/assets/pdf_file/0007/79261/Northern-West-Sussex-Economic-Growth-Assessment-24.01.20.pdf
[45] https://www.horsham.gov.uk/__data/assets/pdf_file/0010/79354/Economic-Growth-Assessment-Appendix-5.pdf
[46] https://www.horsham.gov.uk/__data/assets/pdf_file/0018/104247/Northern-West-Sussex-Economic-Growth-Assessment-Focused-Update-for-Horsham-for-Horsham-Nov-2020.pdf
[47] Links to relevant sections of the Site Assessment Report (December 2023): Part A, Part B, Part E, Part F
[48] https://www.horsham.gov.uk/business/enterprising-horsham

somewhat out of alignment with how a decision maker would be expected to consider applications which relate to new, or loss of retail uses. However, the HDPF's broad aim to protect the viability and vitality of town centres, offering a flexible, diverse and cohesive range of uses to ensure town centres are resilient to changes in shopping behaviours and remain the focus for community life, are still consistent with national policy and guidance. Applications for changes of use or new provision should demonstrate they will enhance the resilience of the town centre hierarchy and do not undermine these wider objectives.

5.51 Changes to the Use Class Order[49] mean A, B, and D Class uses have been revoked and new Classes E, F1 and F2 replace them. Many use changes previously managed through HDPF Policy 13 are now not considered a change of use, so may not require planning permission. The NPPF encourages policies to define the range of permitted uses in defined areas within town centres. While the precise designations of uses for primary and secondary frontages, and main shopping areas, set out in Policy 13 are no longer applicable the preference for active frontages, and for the retention of retail or other town centre uses within these boundaries remains. So too does the resistance to main town centre uses outside of defined town centres. The only exception to this is in the Broadbridge Heath Quadrant (Policy 6) where out of town retail is considered acceptable as part of a mix of uses.

5.52 The town centre hierarchy set out in Policy 12 remains consistent with the approach set out in paragraph 90 of the NPPF in respect of a defined hierarchy of town centres which indicates how retail and other town centre uses should be prioritised and directed based on the role each centre performs and the extent to which it meets the needs of local communities.

5.53 The Enterprising Horsham Economic Prospectus[50] outlines the Council's vision to help deliver the aims in the Council Plan. Applicants should demonstrate how their proposal contributes towards achieving the aims of the Enterprising Horsham framework.

Infrastructure

5.54 HDPF Policy 39: Infrastructure Provision addresses the need for development to be accompanied by sufficient enhancements to existing infrastructure, or new infrastructure provision, to offset impacts and make development sustainable. It encourages applicants to consider what infrastructure provision will be required early in the design of a scheme, and to engage with relevant infrastructure providers to ensure the phasing and timing of development is not impacted by the limited capacity of infrastructure in place already.

5.55 The policy also makes explicit that the Council will use both planning obligations and conditions as well as the Community Infrastructure Levy, to secure and deliver the infrastructure required. This includes phasing and pre-occupation conditions, where necessary.

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[49] https://lichfields.uk/media/vj4lnh3u/guide-to-the-use-classes-order-in-england.pdf
[50] https://www.horsham.gov.uk/__data/assets/pdf_file/0011/146684/FINAL-L25_ED02-Enterprising-Horsham-Economic-Prospectus.pdf

5.56 The Council's Interim Infrastructure Delivery Plan[51] was adopted in March 2025 and presents the most recent assessment of infrastructure need in the District. While this document does not provide an exhaustive list of the infrastructure provision necessary to address all development scenarios (given that some applications for development will require a unique and scheme-specific mitigation and provision) it indicates where there are known shortfalls or capacity issues where it will likely be necessary for developers to engage with infrastructure providers proactively to protect the amenity of new and existing communities. The Interim IDP will be updated regularly to ensure it remains an accurate and relevant reflection of the infrastructure baseline and any capacity issues.

Gypsies and Travellers

5.57 It is considered that HDPF policies 21-23, insofar as they relate to the determination of planning applications, remain broadly consistent with national policy as expressed in the NPPF and Planning Policy for Traveller Sites (PPTS) document. Accordingly, applications will be supported if they come forward on allocated sites identified in Policy 21 and any application for Gypsy and Traveller (G&T) provision will be assessed against the criteria in Policy 23.

5.58 The Council's Authority Monitoring Report 2023/24[52], recognises that at the time of writing, that the Council is unable to demonstrate a five year supply of G&T provision. PPTS paragraph explains 28 that "if a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in para 11(d) of the National Planning Policy Framework apply." Accordingly, the 'tilted balance' is effect for G&T applications and will operate in the same way as for applications for housing.

5.59 As with proposed housing allocations, the eLP seeks to allocate a number of sites to meet the needs for G&T provision. These sites are identified in Strategic Policy 43 of the eLP and Appendix 5 of this document. It is similarly considered that the site allocations were based on robust evidence[53] and that they could accommodate sustainable development. As such, the Council will consider proposals on such sites positively, which accord with eLP (including the quantum of pitches).

Inclusive Communities

5.60 Paragraph 63 of the NPPF identifies that the needs arising from all sections of the community should be considered when establishing the need, size, type and tenure of housing required. Policy 42 of the HDPF recognises that there are likely to be specific needs arising from the aging population, and those with disabilities amongst others. Chapter 10 of the Northern West Sussex SHMA (November 2019) provides the most recent assessment of these needs, which recognises that it would be appropriate for new housing to be delivered to meet Part M4(2) accessible and adaptable home standards, subject to viability testing. Applicants are therefore encouraged to consider whether they are able to deliver an element of such housing in order to meet the identified requirement for the District.

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[51] https://www.horsham.gov.uk/__data/assets/pdf_file/0004/146191/Interim-IDP-2025.pdf
[52] https://www.horsham.gov.uk/planning/planning-policy/authority-monitoring-report
[53] https://www.horsham.gov.uk/__data/assets/pdf_file/0004/132583/HDLP-GT-Site-Assessments-Dec2023.pdf

Appendix 1: Status of Neighbourhood Plans

Below is a table showing the status of Neighbourhood Plan as of August 2025. Up to date information about each Neighbourhood Plan is kept on the Council's website[54].

Table 2: A table showing the status of Neighbourhood Plans as of August 2025

Neighbourhood Plan Area	Date of Making/Stage of Preparation	Includes housing allocations to meet identified need?
Made Neighbourhood Plans		
Nuthurst	21 October 2015	Yes
Thakeham	26 April 2017	Yes
Shermanbury and Wineham	22 June 2017	Yes
Woodmancote	22 June 2017	No
Slinfold	6 September 2018	Yes
Warnham	27 June 2019	Yes
Storrington, Sullington and Washington	5 September 2019	Yes
Ashington	24 June 2021	Yes

[54] https://www.horsham.gov.uk/planning/neighbourhood-planning

Neighbourhood Plan Area	Date of Making/Stage of Preparation	Includes housing allocations to meet identified need?
Billingshurst	24 June 2021	No
Bramber	24 June 2021	No
Henfield	24 June 2021	Yes
Rudgwick	24 June 2021	No
Rusper	24 June 2021	No
Shipley	24 June 2021	No
Southwater	24 June 2021	Yes
Upper Beeding	24 June 2021	Yes
West Grinstead	24 June 2021	No
Steyning	7 September 2022	No
Horsham Blueprint	14 December 2022	No
Emerging Neighbourhood Plans		
Cowfold	Referendum (scheduled 4 September 2025)	Yes
Itchingfield	Referendum (scheduled 4 September 2025)	Yes

Neighbourhood Plan Area	Date of Making/Stage of Preparation	Includes housing allocations to meet identified need?
Lower Beeding	Referendum (scheduled 4 September 2025)	Yes
Pulborough	Referendum (scheduled 4 September 2025)	Yes
West Chiltington	Examination (commenced in July 2025)	Yes

Appendix 2: Sites Identified as housing allocations in Emerging Local Plan

A table identifying the proposed housing allocations in the emerging Local Plan is shown below.

Table 3: A table identified proposed allocations in the emerging Local Plan

Proposed allocation	Number of homes
Strategic Sites	
HA2: Land West of Ifield	3,000 (1,600 within the plan period)
HA3: Land North West of Southwater	1,000 (735 within the plan period
HA4: Land East of Billingshurst	650
Settlement Site Allocations	
HA5: Ashington ASN1: Land East of Mousdell Close	 75
HA6: Barns Green BGR1: Land South of Smugglers Lane BGR2: Land South of Muntham Drive BGR3: Land at the Old School Site	 50 25 20
HA7: Broadbridge Heath BRH1: South of Lower Broadbridge Farm	 133
HA8: Cowfold CW1: Fields West of Cowfold, North of A272 CW2: CW2: Fields West of Cowfold, South of A272/Field West of Cowfold, South of A272, West of Little Potters	 35 35
HA9: Henfield HNF1: Land at Sandgate Nurseries	 55
HA10: Horsham	

Proposed allocation	Number of homes
HOR1: Land at Hornbrook Farm	100
HOR2: Land at Mercer Road	300
HA11: Lower Beeding	
LWB1: Land at Glayde Farm, West of Church Lane	30
LWB2: Land at Trinity Cottage (Land South of Church Farm House	7
LWB3: Land at Cyder Farm 0.15 hectares	6
HA12: Partridge Green	
PG1: Land North of the Rosary (West of Church Road)	80
PG2: Land North of the Rise	55
PG3: Land at Dunstans Farm	120
HA13: Pulborough	
PLB1: Land at Highfields	25
HA14: Rudgwick and Bucks Green	
RD1: Land North of Guildford Road	60
RD2: The Former Pig Farm	6
HA15: Rusper	
RS1: Land at Rusper Glebe	12
RS2: Land north of East Street	20
HA16: Small Dole	
SMD1: Land west of Shoreham Road, Henfield	40
HA17: Steyning	
STE1: Land at Glebe Farm	265
HA18: Storrington	
STO1: Land to the north of Melton Drive and Land South of Northlands Lane	70
STO2: Land at Rock Road	55
HA19: Thakeham	
TH1: Land North of High Bar Lane	25

Proposed allocation	Number of homes
TH2: Land West of Stream House	40
HA20: Warnham	
WRN1: Land South of Bell Road	20
HA21: West Chiltington and West Chiltington Common	
WCH1: Land at Hatches Estate	15
WCH2: Land West of Smock Alley, South of Little Haglands	15
WCH3: Land East of Hatches House	8

Appendix 3: Policies 3 and 4 of the Horsham District Planning Framework

The policy wording of policies 3 and 4 of the Horsham District Planning Framework (HDPF) are found below.

Policy 3

Strategic Policy: Development Hierarchy

Development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy below:

Table 4: A table showing the Council's Settlement Hierarchy

Settlement Type	Settlement Characteristics and Function	Settlements
Main Town	Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.	Horsham
Small Towns and Larger Villages	These are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements	Billingshurst, Bramber and Upper Beeding, Broadbridge Heath, Henfield, Pulborough and Codmore Hill, Southwater, Steyning, Storrington & Sullington*
Medium Villages	These settlements have a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day to day needs for residents, but rely on small market towns	Ashington, Barns Green, Cowfold, Partridge Green, Rudgwick and Bucks Green, Slinfold, Warnham, West Chiltington Village and Common

Settlement Type	Settlement Characteristics and Function	Settlements
	and larger settlements to meet a number of their requirements.	
Smaller Villages	Villages with limited services, facilities, social networks but with good accessibility to larger settlements (e.g. road or rail) or settlements with some employment but limited services facilities or accessibility. Residents are reliant on larger settlements to access most of their requirements.	Christ's Hospital, Lower Beeding, Mannings Heath, Rusper, Small Dole, Thakeham (The Street and High Bar Lane)
Unclassified settlements	Settlements with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residents	All other settlements

*This does not include the hamlet of Sullington which is located entirely within the South Downs National Park

Policy 4

Strategic Policy: Settlement Expansion

The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;

1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.

2. The level of expansion is appropriate to the scale and function of the settlement type.

3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.

4. The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and

5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

Appendix 4: Sites Identified for Employment use in Emerging Local Plan

A table identifying the proposed employment allocations in the Emerging Local Plan is shown below.

Table 5: A table identifying employment site allocations in the emerging Local Plan

Site	Indicative employment floorspace
Strategic Allocations	
HA2: Land West of Ifield	Around 2.0 hectares
HA3: Land North West of Southwater	Around 4.0 hectares
HA4: Land East of Billingshurst	Around 0.5 hectares
New Employment Allocations	
EM1: Land South of Star Road Industrial Estate, Partridge Green	3.8 hectares (around 9,000sqm)
EM2: Land to the West of Graylands Estate, Langhurstwood Road, Horsham	3.0 hectares (around 9,000sqm)
EM3: Land at Broomers Hill Business Park, Pulborough	2.7 hectares (around 7,000sqm)
EM4: Land South West of Hop Oast Roundabout	1 hectare (around 3,000sqm)

Appendix 5: Sites Identified for Gypsy and Traveller Accommodation in Emerging Local Plan

A table identifying the proposed G&T allocations in the Emerging Local Plan is shown below.

Table 6: A table identifying proposed G&T allocations in the emerging Local Plan

Site	Existing Authorised Pitches	Proposed Additional Net Pitches	Total Gross Pitches (Net pitches)
Gypsy and Traveller Pitches			
Land at Junction of Hill Farm Lane and Stane Street, Codmore Hill	2	2	4(2)
Fryern Park, Storrington	2	2	4(2)
Northside Farm, Rusper Road	1	3	4(3)
Southview, The Haven, Slinfold	1	4	5(4)
Sussex Topiary, Rudgwick	4	8	12(8)
Plot 3, Bramblefield, Crays Lane, Thakeham	1	3	4(3)
Land at Girder Bridge, Gay Street Lane, North Heath, Pulborough	0	5	5(5)
Land East of Billingshurst	0	5	5(5)
Land West of Ifield	0	15	15(15)
Land North West of Southwater	0	5	5(5)
Kingfisher Farm, West Chiltington Lane, Barns Green	0	11	11(11)
Land East of Coolham Road, Thakeham	0	2	2(2)
Land North West of Junipers, Harbolets Road, West Chiltington	0	3	3(3)
Downsview Paddock, New Hall Lane, Small Dole	0	1	1(1)

Travelling Showpeople Accommodation	Existing Plots	Proposed Additional Plots	Gross Plots (Net Plots
Honeybridge Lane, Dial Post	4	1	5(1)