



**Horsham
District
Council**

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Our ref: PE/24/0118
Your ref:
Officer: Matthew Porter
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Tel: 01403 215187
Date: 3rd October 2025

Dear Sir/Madam,

Location: North Heath Lane Industrial Estate, North Heath Lane, Horsham, West Sussex

Details: Demolition of existing commercial buildings and erection of residential development for a scheme of up to 74 dwellings.

Pre-application advice is sought for the demolition of existing commercial buildings and erection of residential development for a scheme of up to 74 dwellings at North Heath Lane Industrial Estate, North Heath Lane, Horsham, RH12 5QE.

Your enquiry has been considered and I can advise as follows:

Procedural Matters

This pre-application query is based on the following submitted material:

- North Heath Lane Estate Vision Document by HTA Design LLP/ Coldunell Limited February 2024
- Supporting letter from North Horsham Community Land Trust
- Ref: 008/24/MS February 2024 RE: COMMENTS RELATING TO REGULATION 19 CONSULTATION ON LOCAL PLAN by D&M Planning
- REF: 008/24/MS May 2024 Pre-Application Planning Statement by D&M Planning
- Braithwaite Energy letter 29 February 2024
- Flude Report 28 February 2024 Financial Viability Assessments for options for the redevelopment of North Heath Business Park, Horsham to residential use
- Flude Report 1 November 2024: Responses to the pre-application response from Horsham District Council for redevelopment of North Heath Business Park, Horsham to a 74 unit residential scheme and further Financial Viability Assessments to support the redevelopment proposals.

The Flude Report 1 Nov 2024 was provided in response to the draft pre-application response provided by Horsham District Council. This draft response included the full consultation responses from the council's strategic policy and economic development teams.

As requested in the Pre-Application Planning Statement (D&M REF:008/24/MS May 2024), this pre-application response, following an Officer visit to site on 16/07/2024, is focused to respond to the listed questions at para 7.5 of the Statement, namely:

- a) The principle of development – namely whether the Council would support the residential scheme
- b) Whether the Council consider that sufficient justification has been provided to justify the loss of the employment use on grounds of viability
- c) Any updates on the Council's Housing Land Supply and the emerging requirement for housing as set out in the emerging plan
- d) Whether, in applying the titled balance, the scheme would be supported by officers
- e) The Council's support towards a 100% Build-to-Rent Scheme and what information would need to accompany an application in support of such. Information about how the Council would secure such would also be invaluable
- f) Comments regarding the proposed housing mix
- g) Whether the Council is supportive of the proposed layouts, or if any amendments should be made to ensure such
- h) Whether any other provisions should be included in the layout, with particular regards to the comments made regarding Pondtail Park
- i) Comments as to whether the Council could support the overall design approach as set out or if not what the expectation would be on the site
- j) Comments regarding the proposed provision of Affordable Housing and any other advice on the matter
- k) Whether the Council consider that the development will deliver a suitable standard of accommodation for future occupiers
- l) Considerations regarding the impact on neighbouring properties and any principles/rules of thumb that a worked up plan should conform to ensure that there are no adverse impacts
- m) Whether the Council would consider the proposed improvement to accessibility into and within the site
- n) Whether the Council would support the overall approach to highways matters
- o) Any advice regarding the preference for the deliverability of BNG on site
- p) The current position of West Sussex County Council as Lead Local Flood Authority in terms of flood risk and the requirement for the sequential test
- q) Comments regarding SuDs and Flood Risk in general
- r) An update to the rollout of the Council backed water offsetting to deliver water neutrality on site or any other alternative schemes
- s) Whether any other information should be required not discussed in this report
- t) The Council's views on whether additional supporting information is required and justified for the application.
- u) Requirements in terms of the level of detail required to accompany a submission to minimise the number of pre-commencement conditions.
- v) Advice on the formal planning application documents in light of the Council's current and adopted Local Requirement List.
- w) Whether officers and the Council could support the development and any amendments that may be required.

Site Description

North Heath Lane Industrial Estate consists of commercial buildings, predominately two storey purpose-built office blocks and several industrial sheds laid out around a central road with parking allocated throughout. It is presented in the pre-application package that the buildings are of an age and condition which requires significant investment to make them serviceable for commercial purposes going forward, as demonstrated within such submission this would not be viable. The buildings and associated hardstanding are located to site boundaries with extensive vegetation on the boundaries outside of the site particularly to the north. There is currently a single access to the site from North Heath Lane.

The surrounding area is residential in character and includes a range of housing types, sizes and detailing. An area of amenities including shops, sports clubs, schools, places of worship etc are

within the immediate context. The site is adjacent to Pondtail Park. The site is well located in terms of public transport providing services to Horsham Town Centre and beyond.

Proposal

The submission documents demonstrate how the site could deliver between 68 and 74 units in a highly sustainable manner, maximising the potential for the site. The site has been designed to be 100% Build-to-Rent (based on current viability projections) and to incorporate the delivery of 20% affordable housing.

Viability

The pre-application package presents reasons why the site is not viable for employment use, namely:

- Restrictive hours of operation, including vehicle movements.
- Upcoming Energy Performance Certificate requirements and associated costs.
- Not financially viable to redevelop (existing buildings or site) to deliver business park.
- All current tenancies due to end by summer 2028 and not sought to re-lease their units/are actively expressed interest in moving elsewhere.
- Units and site infrastructure coming to end of its life and associated costs of addressing this, includes below ground drainage due to recent water leaks

Notwithstanding this, in the pre-app material it is presented that options have been considered, which include:

1. Retention and refurbishment of the existing buildings on the estate
2. Retention and full refurbishment of some of the existing buildings on the estate – to include all works necessary to improve the EPC ratings – and redevelopment of part of the site with new industrial / warehouse units.
3. Redevelopment of the estate with a small unit scheme.

Detailed cost advice was obtained from Quartz Quantity Surveyors for each option. This includes for works necessary to improve the EPC ratings to meet forthcoming EPC legislation. The submitted Braithwaite Energy report presents that only five of the 16 assessed buildings have EPC assessments which comply with current legislation.

The proposed legislation is that buildings must have an EPC C rating by 1 April 2027 and a B rating by 1 April 2028. The applicant has commissioned advice on what needs to be done to meet these EPC ratings, how much this will cost and then modelling options to retain and refurbish the existing estate and to redevelop the estate in part or in whole.

It is presented by the applicant that the financial viability assessments for the above three options to retain commercial use to the estate – to include a small unit scheme - shown generate substantial negative site values, and they are each therefore unviable. Whilst the residential scheme shows a positive site value and is therefore viable. It is not a matter that the units cannot be upgraded to meet standards for re-letting (including EPC ratings). It is a matter that the costs involved to achieve this are not financially viable.

To demonstrate options to partial redevelopment of the estate as opposed to whole estate redevelopment, the applicant also prepared two further schemes to show redevelopment of the site to: 1. 25% of the site to residential use and 75% of the site to commercial use; 2. 75% of the site to residential use and 25% of the site to commercial use The associated financial viability assessments show negative site values, and these options are therefore unviable.

STATUTORY BACKGROUND

Horsham District Planning Framework (HDPF 2015)

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 5 - Strategic Policy: Horsham Town
Policy 7 - Strategic Policy: Economic Growth
Policy 9 - Employment Development
Policy 15 – Housing Provision
Policy 16 – Meeting Local Housing Needs
Policy 24 - Strategic Policy: Environmental Protection
Policy 31 – Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 39 - Strategic Policy: Infrastructure Provision
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities
Policy 43 – Community Facilities, Leisure and Recreation

Horsham District Local Plan (2023-40) (Regulation 19)

Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 3: Settlement Expansion
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 10: Flooding
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Strategic Policy 23: Infrastructure Provision
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Policy 28: Community Facilities, Leisure and Recreation
Strategic Policy 37: Housing Provision
Strategic Policy 38: Meeting Local Housing Needs
Policy 39: Affordable Housing
Policy 40: Improving Housing Standards in the District

West Sussex Joint Minerals Local Plan (WSCC 2018, Revised 2021)

Policy M9 - Safeguarding Minerals

West Sussex Waste Local Plan (2014, Reviewed 2019)

Supplementary Planning Documents:

HDC Planning Obligations and Affordable Housing Supplementary Planning Document (2017)

HDC Community Infrastructure Levy (CIL) Charging Schedule (2017)

WSCC Supplementary Planning Guidance (September 2020) - revised county parking

standards and transport contributions methodology
Horsham Town Plan SPD (HDC, 2012)
Horsham Town Design Statement SPD (HDC, 2008)

Other Guidance:

Horsham Town Centre Vision (GVA/HDC, 2017)
Horsham District Council Local Cycling and Walking Infrastructure Plan (HDC Dec 2020)
HDC Sports, Open Space and Recreation Assessment (2014)
HDC Open Space, Sport & Recreation Review (2021)
Air Quality and Emissions Mitigation Guidance for Sussex (2020)
HDC Planning Advice Note: Biodiversity and Green infrastructure (2022)
HDC Planning Advice Note: Shaping Development in Horsham District (2025)
Good By Design (Horsham Society 2018)

ASSESSMENT

Considering the quantum of development proposed, the main areas for consideration are:

- Principle of Development (Development Plan and loss of the existing commercial and town centre vision)
- Housing Mix and Affordable Housing
- Townscape character
- Impact on Residential Amenity (future occupiers and adjoining properties)
- Highways Impact, Access, and Parking
- Ecology • Water Neutrality
- Drainage and Flooding
- Climate Change; and
- Community Infrastructure Levy

Principle

The Development Plan at the application site area comprises the Horsham District Planning Framework (HDPF 2015) and the West Sussex Joint Minerals Local Plan (2018). In accordance with planning law, these documents form the statutory development plan and the starting point for the assessment of the development proposals.

The Development Plan and planning policy context

This matter is twofold; i) whether redevelopment of the employment site acceptable and ii) whether residential development is supported in this location having regard to Horsham town centre planning policy.

Redevelopment of employment site

The site is brownfield, in an accessible urban location of Horsham town, and its redevelopment as a broad principle would accord with HDPF Policies 2 and 3 (Development Hierarchy) and is compatible with Horsham Town vision objectives under HDPF Policy 5.

The HDPF currently seeks to increase gross employment floorspace within the district to improve the delivery of employment stock to satisfy future needs. Policy 7 of the HDPF sets out the strategic approach to delivering sustainable employment development in the district, including through redevelopment, regeneration, intensification and smart growth of existing sites. The site currently constitutes an 'employment area' under Policy 9 of the HDPF. Policy 9 states that the redevelopment of employment sites and premises outside Key Employment Areas must demonstrate that the site/premises is no longer needed and/or viable for employment use.

The Council's most recent employment evidence is set out in the Northern West Sussex Economic Growth Assessments (EGAs) and related documents (Jan 2020 [including Appendix] and Nov 2020), as part of the Council's evidence base for its Local Plan Review. The Council identified a

lack of supply of commercial sites in the district, in terms of meeting the needs of the office and industrial/warehouse sector.

The Council's Economic Development and Planning Policy teams previously identified that the proposed potential loss of some 7,000sq.m of commercial / employment floorspace as outcome to this pre-application proposal as a concern. Horsham town is the main commercial area within the district. Based on the Economic Growth Assessment (Jan 2020) (EGA) Horsham town provides around 37.8% of the jobs in the district, for comparison the next biggest commercial settlement is Southwater which provides around 4.5% of the jobs.

The Lichfields Update (Nov 2020) concluded it continues to be necessary to protect valued employment and commercial sites to ensure there are sufficient local employment opportunities to meet the needs of the District, and so current local plan policy expressed in criterion 2 of HDPF Policy 9 'Employment Development' therefore continues to be relevant - resisting the loss of employment sites unless it has been demonstrated that the site is no longer needed and/or is no longer viable for employment use.

In researching property market signals, the Lichfields study concluded that whilst Horsham District operates as a secondary property market, it continues to attract demand from a range of occupiers. For the industrial market (B1c, B2, and B8) the Council's monitoring data identifies the need to prepare for additional opportunities.

For the industrial market, the study assessed scenarios of future economic growth in Horsham and produced B class floorspace requirements. For Horsham, the scale of requirement implied by the past take-up and baseline labour supply scenarios (i.e. between 35 and 39 ha / 154,940 sqm and 157,710 sqm) appears to represent the most robust and aspirational scenario to plan for and would appear to align well with the Council's ambitions for development and regeneration over the coming years. The quantitative balance between identified future employment development needs and pipeline supply appears to be more even in Horsham District, with pipeline planning permissions providing a quantum of employment floorspace that would broadly match future growth needs associated with the past take-up and baseline labour supply scenarios, albeit with a likely shortfall in terms of industrial space. So, the Council will want to consider how this shortfall could potentially be addressed through intensifying existing employment sites.

From a more qualitative perspective, there is significant scope to enhance the quality of offer associated with Horsham's office market, and to support the district to strengthen its office-based economy following significant losses of office space and occupiers because of Permitted Development Rights over the last few years.

The key challenge facing the office market going forward is to accommodate changing patterns of demand through provision of high quality, Grade A space in accessible locations which also offers the flexibility sought by occupiers (in terms of smaller units and associated amenity space).

Following these studies, the site is now proposed to be identified as a Key Employment Area under Strategic Policy 30 of the Submission Horsham District Local Plan (HDLP). Presently the HDLP carries limited weight, for reasons explained here: <https://www.horsham.gov.uk/planning/local-plan/local-plan-examination>

It is acknowledged that some types of employment would not be attracted to the site due to the restrictions on operating hours. However, as reported in the Economic Growth Assessment (Jan 2020) approximately 90.5% of businesses are micro (0 to 9 employees) which means many are one person businesses and many would just be operating in normal working hours due to the need to connect with other businesses and because the number of employees is too few to operate 24/7 hours.

EPC rating and MEES Regulations

The methodology employed in the submitted financial viability assessments to costing for the EPC ratings has been queried and has been the subject to further investigation by the council following an approach it made to an external consultant.

The advice given to the council was that the presentation in the pre-application is inaccurate and consequently there is risk of consenting a scheme with regard taken of the claimed difficult/financial impossibility of ensuring the properties achieve the future MEES standards. Furthermore, the presentation in the application on this point is misleading and instead it would be expected that the applicant (or an alternative future landlord of the property) will readily be able to ensure the properties meet the required standards at minimal or no capital cost.

Consequently, the Council would be placing no leaning whatsoever on this point in their consideration of whether any of the properties on the site may be suitable for demolition as opposed to future employment use in their existing form.

Whilst it was expected there to be some units achieving poor results, it is anticipated that the means of remedying this or otherwise enabling the units to continue to be let in compliance with the 'MEES Regulations' will not be prohibitive or significantly affect the ongoing commercial viability of the site retained in its current form.

It is important the Council gains independent advice from a suitable 'Level 5' qualified EPC assessor to review the units and guide in turn on what the reality is on the task of ensuring their future compliance.

To advise comprehensively on this, the advice was the most apt action would be for a wholesale assessment of the units across the site. Alternative means of assessment to those employed by the applicant are available to verify the submitted assessments - SBEM' (level 3 or level 4 assessments) or 'DSM' (level 5 assessment), with the Level 5 assessment deemed the most detailed/accurate/dependable, but the SBEM alternative being acceptable.

Having regard to this advice, the Council challenges the validity of the conclusions of the submitted financial viability assessments. The applicant has been made aware of the need to address this in any future application submission.

Residential development

The site is considered a sustainable location (the key settlement of Horsham) which would accord with the Council's strategic policies about where development should be located (HDPF Policy 2). Being within Horsham it would be deliver housing in accordance with the aims of the settlement hierarchy (Policy 3 of the HDPF), which also is clear that any infilling and redevelopment must demonstrate appropriate nature and scale to maintain characteristics and function of the settlement.

Horsham Town Plan (2012) and Horsham Town Centre Vision (2017)

In 2012 the Council developed the Horsham Town Plan SPD which sets criteria by which the merit of planning applications within the town centre are assessed. The Town Plan SPD sets out that future commercial development (including B1, B2 and small scale B8 uses) should be focused on Hurst Road and Nightingale Road area and that the Council will consider the loss of office floor space in the town centre subject to conditions (there being certain occasions when the loss of commercial floorspace is outweighed by the benefit to the community and overall contribution to the future prosperity of Horsham. In this instance the loss of commercial uses, to uses such as residential, use may be acceptable, para 5.7).

The Horsham Town Centre Vision (2017) added to this work by establishing a medium-term vision (10-15 years) for the town centre to be used by the Council to ensure proposals reflect this vision.

The Vision was devised in part to meet forecast requirements and, in relation to the commercial and office markets, its guidance did not deviate from that set out in the 2012 Town Plan.

Accordingly, it is considered that the current development proposals are sufficiently aligned with the broad Aims and Objectives of the town centre SPDs.

Summary

Therefore, a full detailed case should be submitted with any application to evidence that it is not viable for all or indeed part of the site to be upgraded to meet the necessary standards for re-lease, detailing the nature of work required to meet the minimum MEES criteria in the event of the existing being re-let, alongside the costings of such work. Absent of a clear and compelling case to this effect, the principle of the loss of this significant quantum of employment floorspace would be resisted as being contrary to Policy 9 of the HDPF.

As detailed within the Council's Economic Development and Planning Policy comments, insufficient information has been provided as part of the pre-application submission to address the requirements of policies 6 and 9 of the HDPF. Accordingly, based on the information submitted so far, the principle of the loss of the pre-application site as an employment area would not be supported.

b) Justification to loss of employment use on grounds of viability

Addressed above.

c) Update on Council's Housing Land Supply and emerging plan

The council's latest housing land supply position is the authority's published position in its 2023/24 Authority Monitoring Report (1 year), found here: <https://www.horsham.gov.uk/planning/planning-policy/authority-monitoring-report>. The latest position on the Council's emerging local plan can be found here: <https://www.horsham.gov.uk/planning/local-plan/local-plan-examination>

d) Applying tilted balance

Based on the information submitted with this pre-application enquiry, a full understanding of planning merit is not available to officers to advise on a conclusion in applying the tilted balance.

e) 100% Build-to-Rent Scheme

The starting point is for development schemes to seek conformance with the affordable housing models set out in Policy 16 of the HDPF, which is evidenced to identified affordable need in the district.

In the absence of Council adopted local policy or standards in relation to Build to Rent (BTR), paragraph 71 of the NPPF and the Annex 2 Glossary definition 'other affordable housing for rent' prevails.

HDPF Policy 16 requires a mix of housing sizes, types and tenures to meet the needs of the district and local communities, and, at face value, a BRT offer would add to housing choice within Horsham town for those who wish to rent.

It is noted there is a trend for BTR to enter the single-family market, with professionally managed estates of single-family homes, with a focus on two and three-bedroom homes. This helps support the notion that a suburban, low-to-mid-rise BTR development could provide an alternative living option for middle-income families in Horsham town and thereby add to housing choice in the market.

On the securing mechanism of Build to Rent terms through the planning submission, regard will be had to the Planning Practice Guidance chapter on Build to Rent (last updated 13th September 2018), particularly Paragraphs 005-010.

f) Housing mix

It is acknowledged a BTR offer would skew the housing mix so it would not confirm to the SHMA 2019 as Build-to-Rent (BTR) properties are essentially housing developments specifically designed for target renter demographics and so tailored to the needs of specific tenant groups, such as families.

In justifying a BTR tailored housing mix for families, a future submission should be supported by an evidenced assessment that high house prices in Horsham are challenging homeownership for most middle-income earners, with evidence of the number of renters in the 35-64 age group having grown and evidence of a need for a different style of rental experience, with access to more space and amenities while still having a sense of own private space.

Specific demographic data is available on open data communities which can be used to inform this process. Such an assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups.

g) Layout

It is understood both options 1 and 2 presented in the Vision Document detail a BTR scheme designed to the target demographic and their needs.

However, the layouts shown more resemble an overlay of a conventional suburban estate than a translation of the principles of an BTR scheme; the communal areas of BTR buildings in urban settings (lobbies, corridors, or other internal shared spaces) should translate to areas such as streets, squares and landscaped spaces in a sub-urban context. These are the places where members of the community can engage with one another, which is why their design is of such key importance.

Conversely, the scheme layouts show predominately pairs of semis of conventional footprint, plot shapes and sizes, with servicing infrastructure (parking) within individual plot demises. The prevailing character is private sphere rather than communal.

The design of the public realm needs to be carefully considered and, as with any feature that adds a higher level of quality, service or amenity, it is important to understand the relationship between cost, ongoing operational expenditure and the potential value or return which could be generated.

It is not considered either option 1 or 2 embrace BTR principles, especially in regard to communal self-containment of the scheme; the suggestion not to provide integral child play space within the development and instead rely on play space outside of the development is especially telling in this regard.

h) Other layout provisions with regards to Pondtail Park

Site redevelopment should maximise opportunities for dedicated off-road Active Travel routes through the development and into Pondtail Park; firstly, a west-east link from North Heath Lane into Pondtail Park and, secondly, north-south from Amundsen Road (subject to selective vegetation removal) into Pondtail Park.

The movement hierarchy in the development should prioritise these links, with building form arranged to provide strong vistas along the link route to the end destinations. The links shown on the pre-application material are inadequate to achieving this.

i) Design approach

Subject to some tempering by reference to surrounding built form (in particular building heights and scale), expectations would be to take the opportunity to add a genuine alternative housing

choice to the Horsham market, with adoption of BTR principles realised in the design expression of any proposal, as illustrative below.



There is a suite of design documents relating to Horsham town that require a development scheme to respond to: Horsham Town Neighbourhood Appraisal (2005); The Horsham Town Design Statement SPD (2008); Horsham Town Plan (2012); Horsham Heritage and Character Assessment (“017); and Good By Design 2018) by Horsham Society.

j) Affordable Housing

As stated above regard is had to the Planning Practice Guidance chapter on Build to Rent. Paragraph 002 of this chapter states that the NPPF states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents.

However, regard is also given to Paragraph 004, below:

Is affordable private rent the only form of affordable housing permitted on build to rent schemes? It is expected that developers will usually meet their affordable housing requirement by providing affordable private rent homes. However, if agreement is reached between a developer and a local authority, this requirement can be met by other routes, such as ... other forms of affordable housing as defined in the NPPF glossary.

In 2024, the Housing Register in Holbrook had 444 households waiting for housing of which is broken down to 110 households in need of a 1-bedroom unit, 115 households in need of a 2-bedroom unit, 167 households in need of a 3-bedroom unit and 52 households in need of 4 or more bedrooms.

Based on these figures, a percentage split for affordable rental housing mix has been calculated and the percentage difference with the proposed housing mix established in the table below.

No. beds	Proposed housing mix		Affordable housing mix demand		Difference
	No. proposed	% of total	Holbrook Housing Register	% of total	% provision difference
1-bed	8	11%	110	25%	-14%
2-bed	35	47%	115	26%	+21%
3-bed	27	36%	167	38%	-2%
4+bed	4	5%	52	12%	-7%
TOTAL	74		444		

Housing Officers expect to see a delivery of tenure sizes in line with the current demand, while the number of households waiting for 3- and 4-bedroom properties can be lower than other tenure size they tend to be the households who wait the longest on average to be rehoused, therefore

Housing Officers would ask for this to be taken into consideration when determining the affordable housing provision.

From the above table, an overprovision of 2-bed housing and under provision of 1-bed, 3-bed and 4+ beds are proposed within the 20% offer of the BTR presented. It is recommended that these figures are reviewed, and a revised housing mix considered to better reflect the local need for affordable housing ahead of any application submission.

On the offer of 20%, this is a policy standard with the emerging Local Plan, which is afforded only limited weight. This does not reflect adopted policy 16, which seeks 35% affordable homes (tenure type being social rented, affordable rented or intermediate housing). It is therefore welcomed that a financial viability assessment has been run for residential redevelopment of the site to 74 units assuming 35% affordable housing (Flude Report Nov 2024). This shows this option to be unviable. Albeit it remains the least unviable of all the options. It is noted that a further assessment for residential redevelopment of the site to 74 units was run to establish at what level of affordable housing the appraisal shows a positive site value. This shows that allocating 30% to affordable housing generates a small positive site value and that this option is viable.

As previously set out, the loss of employment is a serious concern to the council. An increased affordable provision of 30% with some of this as tenure that meets the HDPF Policy 16 definition, within a BTR offer, would be afforded appropriate weight in the overall balance of material planning considerations.

Shaping Development in Horsham District (SDPAN)

The Council has produced the Shaping Development in Horsham District (SDPAN) which will be a material consideration in planning applications, with status as a Planning Advice Note. The document sets out the Council's aspirations and the weight that can be given to current policy within the context of current legislation, national policy and guidance.

The Shaping Development in Horsham District document was endorsed at Cabinet on 17 September 2025. It continues to endorse the requirements of HDPF Policy 16 in planning decision-making: https://www.horsham.gov.uk/_data/assets/pdf_file/0016/150802/Shaping-Development-in-Horsham-District-Planning-Advice-Note.pdf

k) Suitable standard of accommodation for future occupiers

The Planning Practice Guidance chapter on Build to Rent at Paragraph 011 states that individual schemes should meet any relevant local and national planning policy requirements.

Whilst not a requirement, there is strong encouragement to the provision of Part M4(2) and M4(3) within any future scheme submission.

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 can deliver an element of such housing to meet the identified requirement for the district.

l) Neighbouring properties - impacts

Regarding existing neighbouring occupiers (Barnsnap Close and Amundsen Road), to avoid adverse amenity impacts, expectations would be for adherence to planning practice 'rule of thumb' separation distances and orientations appropriate to the prevailing pattern to development at the site perimeter (25 metres back-to-back and 15 metres flank to rear etc).

Within the developable area itself, there may be opportunity for some foreshortened distances/orientations between future dwellings, dependent on the scheme concept utilised to maximise appropriate redevelopment potential (courtyard mews etc, for instance).

m) Improvement to accessibility into and within site

Addressed in preceding questions.

n) Overall approach to highways matters

As WSCC Local Highway Authority operates its own pre-application advice service, highway matters, including parking provision, are for the County to advise.

It is strongly recommended to engage with the pre-application services at WSCC as such matters are critical to inform layout and density.

o) BNG

The statutory framework is clear that Biodiversity Net Gain be delivered on-site before offsite delivery is considered. Any on-site 'significant' gain, defined as 0.5 Biodiversity Units, is to be secured via s106 agreement. Likewise the use of off-site gain on unregistered land is to be secured by s106 agreement. Completion of the BNG matrix is required as part of any submission to establish the baseline and how BNG is to be achieved.

p) Flood risk and sequential test

The site is located within Flood Zone 1 but the rear (west) of site is identified in Environment Agency flood risk mapping to be within 1 in 1000 year and 1 in 30 high risk of surface water flooding.

It is for Horsham District Council planning officers to determine if a sequential test for flood risk is required. Planning Practice Guidance (PPG) Paragraph 027 was updated 17th September 2025 on how the sequential test should be applied to planning applications, below:

In applying paragraph 175 [of the NPPF] a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.

Provided a site-specific Flood Risk Assessment satisfies PPG paragraph 027, a sequential test is not required.

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#the-sequential-approach-to-the-location-of-development>

q) Sustainable urban Drainage

Necessary incorporation of SuDS is integral to informing an appropriate surface and foul water drainage strategy that meets national and local planning policy and guidance. The Local Lead Flood Authority provides its own pre-application advice service, and it is strongly advised to obtain this.

r) Water neutrality

Background to Water Neutrality is found here: <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district>. A Water Neutrality Statement is required to demonstrate there will not be a net increase in capacity or if there is, how this will be addressed through on-site water efficiency fixture and fittings measures and eligibility to access the council's Sussex North Water Certification Scheme (SNWCS) or a bespoke off-site strategy (including onsite borehole).

s) Any other matters

Environmental Protection

Horsham District Environmental Health advice:

i) Land Contamination: Given historic/current use of site the view ground on site has potential to be contaminated. Given above and fact the proposed use is sensitive to presence of contamination any full or outline application for residential development will need to be supported by robust preliminary risk assessment (PRA), undertaken by suitably competent, qualified and experienced environmental consultant.

ii) Air Quality: Applicant should undertake a screening level assessment of air quality in line with the requirements set out in the Air Quality and Emissions Mitigation Guidance for Sussex, which should include: Definition of baseline conditions, including identifying relevant monitoring data and existing sources of pollutants in area; Qualitative assessment of impacts of road traffic emissions associated with proposed development (based on latest EPUK/IAQM guidance); Qualitative assessment of suitability of site for introduction of new sensitive receptors, based on existing air quality baseline; Assessment and control of dust during demolition and construction - Air Quality dust risk assessment; Damage costs and Emission Mitigation Assessment. The purpose of this assessment is to quantify monetised health damage value associated with transport emissions from the development. Refer to latest Sussex Air Quality Guidance. Regarding measures put forward in air quality mitigation plan request applicant avoids duplication of measures normally required through other regimes.

iii) Noise: East side of development is near heavily trafficked North Heath Lane – road traffic noise therefore potential constraint to development. To ensure site suitable for residential development any application will need to be supported by robust noise impact assessment undertaken by suitably competent noise consultant who are members of ANC and accredited to Institute of Acoustics (IOA).

t) Additional supporting information

Refer to commentary above.

u) Level of detail to minimise conditions

Submission at application stage of the detail necessary to discharge pre-commencement conditions (such as coordination of the landscaping strategy and tree protection with drainage, surface and foul drainage strategy, site levels, and underground services, as well as construction phase logistics), has the potential to avoid imposing of relevant pre-commencement conditions (dependent on the acceptability of such detail).

v) Local Requirement List

In addition to the application form, fee and usual suite of location plans and architectural drawings, the supporting documents that should be submitted include:

- Site specific Flood Risk Assessment
- Surface and Foul Drainage Strategy
- Planning Statement (including affordable provision detail)
- Marketing information, details on improvements necessary to confirm to MEES
- Design and Access Statement
- Landscape Masterplan
- Preliminary Ecological Assessment
- Arboricultural Appraisal and Tree Survey
- DEFRA Metric / BNG
- Transport Statement
- Energy Statement
- Land Contamination Assessment

- Noise Impact Assessment
- Air Quality Assessment
- Water Neutrality Statement
- S106 Draft Heads of Terms

w) Support of the development

The evidence presented in this pre-application material to justify the loss of the employment space is not at this stage compelling nor convincing, with advice from an external consultant approached by the Council challenging the validity of the methodology undertaken to assess viability, and for this reason alone the pre-application proposal is not supported based on its conflict with Policy 9.

However, in the scenario that evidence is submitted that would address this matter, under the current development plan, there is potential for residential redevelopment of the site, provided the quantum and type of redevelopment would help meet identified housing need. If such need for those wishing to rent can be evidenced, this could include Build to Rent, with an affordable provision that satisfies the Planning Practice Guidance chapter on Build to Rent whilst also offering provision to need as identified in local plan policy (HDPF Policy 16).

Officers advise this when the proposal is assessed against the development plan and policies in the NPPF when taken as a whole, having 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, there is the potential for officers to conclude that, applying the tilted balance, the benefits of the housing would outweigh the lack of continued viable employment use of the site (if sufficiently evidenced).

The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/24/0118 in your submission.

Yours faithfully

Matthew Porter
Senior Planning Officer

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Horsham District Council implemented a Community Infrastructure Levy (CIL) Charging Schedule on 1st October 2017.

The Community Infrastructure Levy is a charge placed on new development. The funds raised will help to pay for a wide range of infrastructure to support development across Horsham District.

Most new development which creates net additional floorspace of 100m² or more, or creates a new dwelling, (including permitted development), is potentially liable for the levy.

How does it affect you?

Applications for CIL liable development which are determined on or after 1st October 2017 are required to pay the Community Infrastructure Levy (unless the development qualifies for relief or exemption).

Further information and the rates charged by Horsham District Council are set out in the CIL Charging Schedule which can be viewed online at www.horsham.gov.uk/planning/apply/cil

General Consent e.g. Permitted Development

Developments which are permitted by way of a general consent (such as permitted development) may still be liable to pay the Community Infrastructure Levy if they meet the above criteria.

In these circumstances, you must submit a Notice of Chargeable Development (CIL form 5), notify us of the person who will assume liability to pay the CIL and make any applications for relief or exemption, before the development is commenced.