



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 6i: HA10 Horsham: site HOR3 only

Questions iv - v

September 2026

Contents

HA10 Horsham: site HOR3 only 3

i. Whether the site allocation within the National Landscape is justified, having regard to housing need and sustainability considerations 3

 The integrity of the High Weald National Landscape 4

 The protection of trees and woodland 5

 Links to the town centre 6

Further Proposed Modifications 7

HA10 Horsham: site HOR3 only

i. Whether the site allocation within the National Landscape is justified, having regard to housing need and sustainability considerations

1. Land South of New House Farm (HOR3) is located on the north-eastern edge of the defined built-up area boundary (BUAB) of Horsham. New Moorhead Drive adjoins the site to the south, Crawley Road to the west and Old Crawley Road to the north-west. The site lies entirely within the High Weald National Landscape (formally High Weald Area of Outstanding Natural Beauty). The western boundary of the site also aligns with the western boundary of the National Landscape
2. The NPPF (September 2023) paragraph 176 states:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

3. Paragraph 177 goes on to state that when considering applications for development within National Landscapes permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Whilst paragraph 177 specifically refers to planning permissions, it is also considered relevant to allocations within Local Plans.
4. The Council is of the view that there are exceptional circumstances pertaining to the allocation of HOR3 and that it is in the public interest to allocate the site for the following reasons:
 - a) Given the very significant need for housing development in Horsham District, including the requirement to assist with the un-met need of the South Coast and Crawley Borough, it has been necessary to reconsider limited development in this location. There is currently a critical 5-year housing land supply deficit, which has impacted on the delivery of housing (both market and affordable) within the district. The allocation of this site would help to deliver this need, including the un-met housing needs close to the location of where they have arisen. The site will also deliver an element of affordable housing as well as market housing.
 - b) The scope for developing outside of the designated area boundary is limited. As detailed within the **Site Assessment Report Update – Introduction (HDCJB14a)**, in order to ensure that future housing needs of the district can be met, the Council is required to assess all available land to understand whether it is suitable, available and achievable for development over the next 15 years. Given the need to identify additional allocations, for both housing and employment, the Council undertook a systematic review of sites that had previously been discounted. The methodology for the review, including site size, changes to availability, location and context including those located within the designated National Landscape is set out in Chapter 2 of **HDCJB14a**.

The outcome of each of the reassessed sites is set out in the **Site Assessment Report Update (HDCJB14a – f)**. In summary, Land South of New House Farm (HOR3) fared more favourably than other discounted sites (located both within and outside of the designated area) in terms of social, economic and environmental considerations. Notwithstanding the area designation, evidence within the **Landscape Capacity Assessment (EN8)** identifies moderate capacity for development, particularly in locations closely related to the existing urban edge. Whilst it is considered that larger and more extensive development would have notable harm to the landscape character, the Council concluded that some, more limited, development within this

single field (which is already subject to urban influences) is considered to have potential for development whilst able to mitigate visual effects, preserve the wider landscape setting, and maintain the important transition between the urban and rural character of the area.

- c) The site is capable of supporting landscape-led, self-contained development, particularly where a scheme retains and enhances existing trees and hedgerows, provides woodland buffers and habitat connectivity. All of which has been reflected in planning application DC/26/0671 and would result in development which has minimal impact on the integrity of the HWNL.
5. The south-western boundary of the site directly adjoins the BUAB of Horsham, which is categorised as being the 'Main Town' in the development hierarchy (Strategic Policy 2). As the main town in the district, Horsham acts as a hub for services and facilities providing a large range of employment, a number of primary and secondary schools, as well as a college, there are also range of retail, cultural and leisure facilities. Given the good provision of these facilities, Horsham is therefore considered to be the most sustainable settlement within the district in terms of its ability to accommodate additional growth and development.
6. In addition to the site assessment process, a separate sustainability process has been undertaken to consider the relative sustainability of the additional sites identified, in accordance with legislative requirements. The process has considered both individual and cumulative sustainability impacts and have considered how each site performs against sustainability objectives. In conclusion, having accounted for the proposed approach to boosting housing supply (and, in turn, the housing requirement), the plan performs well in terms of housing objectives, and also performs well in term of certain other socio-economic objectives.
7. The appraisal does flag a range of environmental concerns. However, in terms of site HOR3, the **Horsham Local Plan Sustainability Report – Addendum, July 2026 (HDCJB13)** considers the site to have limited landscape sensitivity and containment regarding development creep. The site is in close proximity to a proposed business park at North Horsham, and the report also considers that the site can deliver early, with the pending planning application being suggestive of early delivery.
8. On balance, taking into account housing need and sustainability considerations, including the exceptional circumstances, the Council concludes that the proposed allocation of Land South of New House Farm (HOR3), which is located within the High Weald National Landscape, is justified.

ii. How a scheme would be designed to take account of:

The integrity of the High Weald National Landscape

9. The NPPF is clear that planning policies and decisions should contribute to and enhance the natural and local environment. The scale and extent of development within designated areas should be limited, and development within the setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.
10. The site is a singular 4.9ha arable field located at the western extremity of the High Weald National Landscape. Residential properties lie immediately to the south (New Moorhead Drive and The Larches), with woodland (The Birches – designated Priority Habitat) adjoining the eastern boundary, which substantially restricts views towards and away from the site. The northern boundary consists of a well-established hedgerow, which includes the presence of trees, which also limits the views away and towards the site. The north-west of the site is bounded by Old Crawley Road, and the south-west boundary adjoins Crawley Road (B2195). At present, from the south-western boundary, the site's open and undeveloped nature allows for views towards the wooded character of the National Landscape, and the wider countryside beyond. This landscape also contributes positively to the rural and visually attractive approach to Horsham Town accessed from Moorhead Roundabout.
11. The **Landscape Capacity Study (EN8)** identifies this area of land as having moderate capacity for medium scale housing development when located closer to the existing urban edge. It is acknowledged that any development of this site will have a landscape and visual impact, and that

Careful design is required to take account of the integrity of the National Landscape and mitigate this fact. Development should be based on a landscape-led approach, retaining existing good quality landscape belts, trees and hedgerows where they contribute to the character of the landscape. The inclusion of sufficient buffer zones will protect and enhance these key features, as well as contribute to the delivery of Biodiversity Net Gain.

12. Careful consideration of existing vistas and views should be given from the outset of design to help ensure that the proposal connects with, and is respectful of, the surrounding landscape. In terms of the built form, the use of materials, detailing and colour palette is intrinsic to good design, both in terms of the character of the adjoining existing settlement of Horsham and the identity and context of the National Landscape in which it sits. The use of high-quality structured soft landscaping in the form of locally prevalent planting typographies (such as grass verges with wildflowers, hedges underplanted with bulbs) and native species found in the High Weald throughout the development and at the entrance of the site, as well as placing lower density housing towards the front of the proposed built form will also help to ensure that the allocation is in keeping with the character of the surrounding area as well as help to mitigate the visual impact of the development, providing a transition between the built form and the landscape beyond.
13. Planning Application DC/26/0671 includes an illustrative masterplan which depicts the proposed layout of the scheme and appears to respond well to some of the key considerations outlined above. It also includes supporting documentation in the form of a Landscape Design and Access Statement and a Landscape and Visual Impact Assessment. These matters will ultimately fall to consideration through the planning application process, though the Council considers this illustrates that an acceptable scheme can be achieved on the site.
14. The Horsham District Local Plan 2023-2040 includes a number of relevant policies to aid an applicant in terms of design for proposals located within a protected landscape, such as the High Weald National Landscape:
 - Strategic Policy 16: Protected Landscapes;
 - Strategic Policy 17: Green Infrastructure; and
 - Strategic Policy 19: Development Principles
15. Other key documents, specifically published by the High Weald National Landscape, should also be considered and incorporated into the design of a scheme:
 - High Weald AONB Management Plan (2024-2029)
 - High Weald Design Guide
 - High Weald Colour Study
 - High Weald Soft Landscaping & Planting Plans in Development Proposals
 - Dark Skies Planning Advice Note

[The protection of trees and woodland](#)

16. The site itself is tree-free and as such does not include any arboriculture constraints such as Tree Preservation Orders, Ancient Woodland designations, Traditional Orchards or any trees recorded on the Ancient Tree inventory. There is, however, an area of designated priority deciduous woodland (Birches Wood), as listed under Natural England Priority Habitats Inventory, adjoining the south-eastern boundary of the site.
17. Notwithstanding the status of designation, the retention of the existing network of trees, woodland and established hedgerows is an important element of good design. The proposal should be based on a

landscape-led approach, with root protection zones and appropriate buffer zones between new development and important natural and ecological features, especially the Priority Habitat. Any proposal submitted to the Council should be supported by both an Arboricultural Impact Assessment and Ecological Impact Assessment.

18. It is acknowledged that criterion b) of HOR3, as currently drafted in **MM234**, details mitigation measures to aid design in relation to areas of ancient woodland, veteran trees and trees subject to Tree Preservation Orders. Given the site does not contain, or directly adjoins, any of these listed constraints, the Council proposes the following wording as a main modification to HOR3 criterion b) to correctly address the adjoining Priority Habitat:

“b) Retain, conserve and enhance the adjoining designated priority habitat ‘Birches Wood’, and accord with the aims and objectives of the Green Infrastructure and Local Network Recovery Strategies.”

19. In addition to this new criterion, Strategic Policy 17: Green Infrastructure and Biodiversity and Strategic Policy 19: Development Quality (see MM84) also contain specific criteria in relation to the protection of trees and woodland, both of which provide guidance which will steer design requirements in this regard for arboricultural features located both within and adjoining the proposed allocation. Further information in relation to Priority Habitats and the mitigation required is also contained within **The Green Infrastructure Strategy (EN03)** and recently published **West Sussex Local Nature Recover Strategy (June 2026)**, both of which are referred to in the modified policy and will assist with the layout and design of a proposed scheme.

[Links to the town centre](#)

20. The site lies within easy walking distance of a range of services and facilities within Horsham, specifically those located within the Roffey area. In terms of the town centre itself, Land South of New House Farm (HOR3) is considered to be within walking distance. However, it is acknowledged that the site is at the upper limit of what would be measured as a reasonable walking distance for most.
21. Sustainable transport is good with three half-hourly to hourly services:
- 23 / 23X (Crawley – Worthing) Monday – Saturday (reduced service Sunday / Bank Holidays)
 - 200 (Horsham – Gatwick) Monday – Saturday (reduced service Sunday / Bank Holidays)
 - 98 (Roffey – Southwater) Monday – Saturday (reduced service Sunday / Bank Holidays)

All of which provide links into the town centre and can be accessed via an existing bus stop located outside of The Norfolk Arms, approximately 330 metres from the site

22. The site is well located to the town’s highway network, directly adjoining Crawley Road (B2195), which is one of the main routes into the centre of Horsham, making the town centre easily accessible with the use of a motorised vehicle or by cycling. It is however recognised, as raised in West Sussex County Councils representation (**Main Modifications Comment ID:1518**), that pedestrian, cycling and wheeling connectivity would improve with upgrades to the existing public rights of way. In terms of design, it is therefore important to incorporate the prioritisation of active travel networks, including safe walking, cycling and wheeling routes.
23. West Sussex County Council, as the Highways Authority, have requested that a new criterion should be added to the policy: “Provide proportionate contributions towards the signal optimisation for bus priority at the Moorhead Roundabout (B2195 and A264 Crawley Road approaches)”. However, whilst the Council fully appreciate the need to mitigate highway related improvements which will be required as a result of new developments, we are of the view this is a matter for detail as part of the planning application and related Section 106 process rather than being necessary or appropriate for inclusion within a local plan policy. Given Section 106 Agreements are legally binding contracts, this is considered the best method to ensure specific contributions from a developer.

Further Proposed Modifications

Paragraph / Policy Number	Suggested Change	Reason
Strategic Policy HA10 (HOR3)	Remove HOR3 criterion b) and replace with the following: <u><i>"b) Retain, conserve and enhance the adjoining designated priority habitat 'Birches Wood', and accord with the aims and objectives of the Green Infrastructure and Local Network Recovery Strategies."</i></u>	Reflects fact that site itself does not contain, or directly adjoin, any of the previously listed constraints. New wording correctly reflects the adjoining Priority Habitat.