



Horsham District Local Plan Examination

Matters, Issues and Questions

Response to Inspector's questions concerning the proposed main modifications and the site allocations

September 2026

Inspector's questions concerning the proposed main modifications

MM38 and MM39 – Settlement Expansion

MM38, para 4.37: in the sentence “This policy also provides the context... should arise” the word “further” should be omitted, as in “further shortfall”. The plan does not provide for a shortfall.

1. The Council agrees that the Horsham District Local Plan does not provide for a shortfall. It is however recognised that circumstances may change over the plan period to 2040 and it is therefore appropriate that the wording in paragraph 4.37 be rectified to read:

“This policy also provides the context for considering proposals in the event that any further shortfall in meeting identified development requirements should arise.”

MM39, Strategic Policy 3: to ensure that adequate control is still exercised over development outside settlements following the deletion of Criterion 1, Criterion 2 needs to say “The level of expansion is appropriate to the scale and function of the settlement type and development is well related to the settlement and to transport facilities”. Criterion 3 needs to be changed to say “The development is demonstrated to meet evidenced unmet local housing needs or...”

2. Although the Horsham District Local Plan 2023-2040 is being examined under the September 2023 framework, the Council is mindful that for the purposes of decision making the NPPF August 2026 is operational for decision making. Policies S4 and S5 in particular deal with development within and outside settlements.
3. It is agreed that the current proposed modification SP3 criterion 2 does not provide sufficient clarity in relation of a settlement with a potential development proposal. It is considered that for additional clarity, there should be a relationship with an identified settlement boundary. It is therefore proposed that SP3 criterion 2 be amended to read:

“The level of expansion is appropriate to the scale and function of the settlement type and development is well related to the settlement boundary and to transport facilities.”
4. Regarding the change in wording of Criterion 3; the current wording “identified local housing needs”, was chosen to align with terminology used in the National Planning Policy Framework (September 2023 version), which refers to meeting identified housing need (para 66).
5. The Council agrees that further clarification to this policy is required, including to ensure the wording is consistent with policy S5 of the NPPF (August 2026). It is therefore proposed that SP3 Criterion 3 will be amended to read:

“The development is demonstrated to meet evidenced unmet local housing needs or...”

MM47 and MM58 – Climate Change and Sustainable Design policies

MM47, paragraph 5.12 and MM58 Strategic Policy 8: there needs to be some recognition of the potential to re-use material and structures so I suggest that in place of the deleted paragraph, and also as part of Strategic Policy 8, the plan should say “take advantage of opportunities to reuse existing structures and materials” which is an expression from Policy CC2 (1) (d) of the 2026 NPPF.

6. With regard to paragraph 5.12, the Council proposes the following wording whereby the first part of the first sentence is reinstated and new text added at the end of the paragraph (this aligns with the new criterion proposed to Strategic Policy 8):

“Existing buildings contain embodied carbon (i.e. carbon that was emitted during the construction process) and so it is important that this already emitted carbon is not wasted through the needless

demolition of existing structures. Where demolition is unavoidable, applications will be required to demonstrate how the on-site embedded carbon has been retained. Therefore proposals should take advantage of opportunities to reuse existing structures and materials."

7. The Council proposes a new criterion to be added to Strategic Policy 8:

"1.b) Take advantage of opportunities to reuse existing structures and materials, including the reuse of non-contaminated excavated soil and hardcore within the site."

Subsequent criteria would be renumbered.

MM59 – Water neutrality

MM59, Strategic Policy 9. I question whether it is necessary or effective to say "Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied." It is not clear how this would work in practice for sites allocated in the plan which are being brought forward under present standards, or sites with extant planning permissions. Should standards be tightened, any transitional arrangements are likely to be contained within the Building Regulations so this sentence should be omitted.

8. The policy seeks to ensure that that the Council has a clear approach to water efficiency requirements throughout the life of the plan. The Building Regulations 2010 Part G2 sets out an Optional Technical Standard of 110 litres per person per day (lpppd), which the Council requires as the district lies in an area of water stress.
9. The Council is aware that the Government is reviewing Part G2 of the Building Regulations and consulted on tightening the Optional Technical Standards from 110 lpppd to 100 lpppd. It therefore is of value to signal within the Local Plan that tighter requirements will be applied should the Building Regulations alter, as have been mooted, and will ensure that the policy remains current and effective through the entire plan period. The Council therefore respectfully requests that there is no further amendment to the policy, such that that the wording remains the same as set out in MM59.
10. The Council notes similar wording in the adopted Crawley Borough Local Plan, which seeks to ensure the same outcome.

MM61 - Flooding

MM61, Strategic Policy 10: the policy should have an addition which recognises the potential for site specific flood and hydraulic modelling to inform the developability, design and layout of a site. (See the representation from Homes England).

11. The Council proposes the following sentence to be added to the end of Strategic Policy 10 criterion 5 as set out in MM61:

"Development should consider the potential for site specific flood and hydraulic modelling to inform the developability, design and layout of the site."

MM67 – Air quality (The Mens SAC)

MM67, paragraph 6.16: the contents of this paragraph do not belong here because there is nothing in Strategic Policy 12 that refers to The Mens SAC. The text belongs in the preamble to Strategic Policy 17.

12. The Council proposes deleting paragraph 6.16 from its current location and reinstating it as a new paragraph to sit at the end of subsection titled 'Biodiversity' forming part of the supporting text for Policy SP17 (i.e. to follow paragraph 6.57 of submitted Local Plan). The paragraph text is to be significantly amended taking into account the Inspector's comments as set in the next section of this paper.

The representation from Natural England to MM67 is noted but their proposed wording carries the potential for the triggering of a sudden blanket moratorium on development pending the production of a further mitigation strategy (when one already exists). This is not helpful in a local plan that is meant to meet the District's needs to 2040. I would add that using ANPR to count the number of EVs appears to be a blunt proxy for monitoring emissions because it does not account for emissions reductions working their way through the fleet as a result of past progressive tightening of emissions regulations. The Habitats Regulations contain their own safeguards because development would not be able to proceed if it failed to address likely significant effects to the integrity of the SAC, and Strategic Policy 17(13) requires an HRA and AA in appropriate circumstances. The Council's policy as modified by MM67 is broadly similar to the Epping Forest Plan's approach which was found sound at examination. I suggest the following, which is very close to the wording in Policy DM2 of the Epping Forest Local Plan:

“New development for which it is not possible to conclude no adverse effect on the integrity of The Mens SAC either alone or in combination with other plans or projects, will not be permitted. Where development would have likely significant effects, mitigation measures will be required to ensure that it will have no adverse effect on the integrity of the area. In designing mitigation measures, regard should be had to the Horsham and Chichester Local Plans Air Quality Strategy (AECOM, September 2024) which sets out actions to ensure there is no adverse effect on the integrity of The Mens SAC, especially from ammonia pollution. (Then carry on with MM67.) I would also make the point that the critical parts of MM67 including the first sentence of the suggested wording above should appear in Strategic Policy 17 itself. The Council are invited to comment, preferably in consultation with Natural England, to reach a constructive outcome.

13. The Council proposes to amend the supporting text paragraph to include the Inspector's suggested wording, together with further amendments to Strategic Policy 17. These proposals have been discussed with Natural England. Natural England recognise the Council's position, and have confirmed their support of the additional policy wording. They have however not withdrawn their original representation on this matter. Although this difference in opinion remains, the Council is content that the suggested approach will provide the necessary protections for the habitat.

Additional paragraph (supporting text to Strategic Policy 17 at the end of sub-section 'Biodiversity')

Where development would have likely significant effects on The Mens SAC air quality, mitigation measures will be required to ensure that it will have no adverse effect on the integrity of the area. In designing mitigation measures, regard should be had to the Horsham and Chichester Local Plans Air Quality Strategy (AECOM, September 2024) which sets out actions to ensure there is no adverse effect on the integrity of The Mens SAC, especially from ammonia pollution. The Council will monitor emissions on the A272 at The Mens SAC. Horsham and Chichester District Councils will use Automatic Number Plate Recognition (ANPR) monitoring on the A272, passing The Mens SAC, to track how many ultra-low emission vehicles (ULEVs) are being used over time. Should it become evident through monitoring that emissions arising from vehicle movements from proposed developments, individually or in combination, are likely without mitigation to affect the integrity of the SAC, the Council will seek mitigation measures through conditions and/or planning obligations attached to planning permissions. This will be in addition to the mitigation measures already specified in the Local Plan in respect of development East of Billingshurst. The councils will also keep working with Natural England and other groups to explore other mitigation options.

Proposed amendment to Strategic Policy 17 criterion 13:

Any development with the potential to impact the Arun Valley SPA / SAC / Ramsar site, The Mens SAC and / or Ebernoe Common SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the Habitat Regulation Assessment of this Plan. New development for which it is not possible to conclude no adverse effect on the integrity of these sites either alone or in combination with other plans or projects, taking into account any proposed mitigation measures, will not be permitted. Where

necessary, such as in response to monitoring and updated evidence, mitigation measures will be required and secured through conditions and/or planning obligations attached to planning permissions.

MM76, MM77 and MM78 – Green infrastructure and biodiversity

MM76, MM77 and MM78: the 2026 NPPF allows for biodiversity enhancements which exceed the statutory objective for biodiversity net gain if they are set out for specific site allocations, but I do not consider that there is sufficient evidence to support a blanket 12% and the proposed modifications, which refer to “at least 10%” are therefore satisfactory.

14. Noted and agreed.

MM82 – Development quality, design and heritage (introduction)

MM82, paragraph 7.3: I suggest the Council use the passage from the NPPF which states [Public Spaces] include spaces that are safe, secure, inclusive, and accessible for all ages and abilities, including for groups such as women and girls; and which facilitate and encourage social interaction, play and healthy lifestyles.

15. The Council proposes the following wording to paragraph 7.3 of the introductory text of Chapter 7: Development Quality, Design and Heritage:

“For development to be sustainable, good design is essential. It will need to draw on local, social and environmental characteristics alongside visual and functional concerns. This includes ensuring that the design of development takes account of the needs of residents. In Horsham District this is likely to see increased elderly populations who may experience more mobility difficulties – development (including street design) should be designed to be accessible for all including those requiring wheelchairs. Evidence also shows that males and females do not always use space in the same way, ~~and development should be designed to ensure the needs of girls / teenagers can also be provided.~~⁶ Development should therefore include spaces that are safe, secure, inclusive and accessible for all ages and abilities, including for groups such as women and girls; and which facilitate and encourage social interactions, play and healthy lifestyles. Good design will ensure that development enhances and complements local character, landscape and open spaces, and ensure that environmental mitigation is incorporated into development. Ultimately, good design should achieve vibrant and functional communities with a distinctive ‘sense of place’.”

⁶ Making Space for Girls: https://assets.website-files.com/6398afa2ae5518732f04f791/649a965c4611586b90cc4760_Homes%20England%20Inclusive%20Spaces%20MSFG.pdf

MM84 – Development quality

MM84: Strategic Policy 19: should there be an addition which refers to the need to have regard to the space requirements of utilities?

16. The Council have reviewed the representations received in relation to MM84. With regards to this question, we look to specifically address comments made by Fisher German LLP on behalf of National Grid Electricity Transmission (NGET) (comment ID/506) who object to the main modification as currently drafted, and request an additional criterion to be added to the policy:

“.. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”

17. As currently written, the opening text of Strategic Policy 19 states that “*high-quality and inclusive design for all development in the District will be based on a clear understanding of the local, physical, economic, environmental and policy context*”. It is the view of the Council that this statement addresses the consideration of ‘utilities situated within sites’ as any proposal would need to be based on a clear

understanding of the site's physical context which would include any man-made elements. We therefore consider that Strategic Policy 19 is 'sound' as currently drafted, and do not propose to amend the policy or the supportive text.

MM84: Strategic Policy 19 1(f) is not entirely effective because it does not recognise that these tree and landscape features will often become part of the development, and also will not always be of good quality or in the right place to make the best use of a site. Would it be more effective to say “Retains existing good quality landscape belts, trees, hedgerows and watercourses where they contribute to the character of the landscape or where they will enhance the quality of the development”.

18. As a means of clarification, the Council believes that the wording set out above by the Inspector relates to criterion 1(e), rather than 1(f) which, as currently drafted, seeks to secure good quality open space which meets the identified needs of the community.

19. With regards to criterion 1(e), the Council propose to amend the main modification (MM84) wording as follows:

“Retains existing good quality landscape belts, trees, hedgerows and watercourses ~~that form the~~ where they contribute to the character of the landscape;”

MM90-MM93 – Infrastructure provision

MM90-MM93: Strategic Policy 23: I should like the Council to consider whether further clarification (as a minor modification) would be useful in the background text in respect of the statutory duties of the water authorities, drainage authorities and other statutory undertakers.

20. The Council proposes an amendment to para 8.2 onwards of the supporting text of Policy 23 to read as follows:

“8.2 Much of the infrastructure needed to support development is not provided directly by the Council. A range of organisations are responsible for its provision and maintenance, including the NHS, West Sussex County Council, water and drainage authorities, electricity providers and other statutory undertakers. Horsham District has a strong track record of actively engaging with infrastructure providers, developers and other groups to ensure that the needs of the residents and businesses in the District are met. ~~This ranges from public sector partners such as the NHS on health care, West Sussex County Council on matters such as education and transport, and key utilities providers such as Southern Water, together with developers who are promoting development.~~ This ongoing work has helped to bring forward enhancements and upgrades across the District, which have, over the years, included the redevelopment and expansion of Piries Place in Horsham, The Bridge leisure centre in Broadbridge Heath, and an upgraded Health Care centre in Steyning.

8.3 Many infrastructure providers have statutory duties, powers and responsibilities established through legislation and regulatory frameworks which operate independently of the planning system. For example, water and sewerage undertakers, such as Southern Water and Thames Water, have statutory duties to plan, provide, operate and maintain water supply and sewerage infrastructure in their areas of operation to meet the needs of existing and future customers.

8.4 Lead Local Flood Authorities, the Environment Agency and other relevant bodies have responsibilities relating to flood risk management, drainage and watercourses and play an important role in ensuring that development can be delivered in a manner that minimises flood risk. Other statutory undertakes, including energy providers and telecommunications network operators have a responsibility to provide and maintain infrastructure to support development.

8.5 Infrastructure investment programmes are often planned over long timescales and require coordination between infrastructure providers, local planning authorities and developers. While the Local Plan seeks to facilitate the delivery of infrastructure necessary to support planned growth, it

does not impose obligations on statutory providers that would duplicate, override or undermine responsibilities established through legislation or regulatory frameworks.

8.6 Development should be informed by early engagement with infrastructure providers to ensure that adequate capacity can be provided to serve the development and that, where improvements and new provision is required, applicants should demonstrate how this will be coordinated with the relevant provider. The Council will continue to work proactively and collaboratively with statutory undertakers and infrastructure providers and neighbouring authorities to support the delivery of infrastructure required to accommodate sustainable growth.

[renumber subsequent paragraphs through Chapter 8]

MM93, Strategic Policy 23: in addition to the above, an issue has been raised about how impacts outside the District's boundaries (such as on Crawley) would be mitigated, or improvements funded, in the circumstances where the funding was intended to be from Horsham's CIL. Please can the Council provide an explanation for this and consider whether there needs to be a brief reference to the matter in the supporting text. Also, should there be a list of projects that the Council intend to be funded from CIL?

21. The Infrastructure Delivery Plan (IDP) sets out current the infrastructure provision in the district, any areas where capacity is an issue already and where development might lead to strategic or localised issues with existing provision. It has been produced taking into account engagement between the Council and infrastructure providers. In addition to setting out where enhancement of existing provision or new provision would be required to mitigate development impacts, the document also indicates potential funding sources, such as CIL or S106.
22. The Council has its own Governance process for CIL collection and spending. This requires projects to be included in the Council's most up to date IDP to be eligible for CIL funding. Once a request for funding is submitted to the Council these bids undergo an assessment process during which their link to strategic development is considered before a recommendation on spending is made and agreed. The IDP is a live document which the Council's governance states should be reviewed on an annual basis, or as necessary to reflect changes to infrastructure needs meaning the document itself acts as a list of projects which may be eligible for funding from CIL. Infrastructure providers have not been asked to restrict projects to the District boundary, and there is nothing in the Council's CIL governance arrangements that restrict CIL spending to projects within Horsham District, particularly where these would support delivery of development in the District. The Council considers this is fundamental to the concern around mitigation of impacts beyond the District boundary.
23. Early work to understand cross-boundary infrastructure needs arising from development proposed in the Plan has taken place through the ongoing joint working between officers. This includes those where development in Horsham will impact provision in Crawley. The Council considers this work specifically, and ongoing joint working between Horsham and Crawley, other Councils as appropriate and infrastructure providers where necessary, will be key to ensuring updates to the IDP reflect issues and priorities for investment in infrastructure. Any updates can also reflect the most up to date evidence on the impacts of development as these arise, i.e. as a result of more detailed assessments carried out through a planning application.

MM91, paragraph 8.6: there is no need to refer to "Grampian" A reference simply to "conditions" will suffice since there may be a number of possible approaches in the circumstances.

24. The Council proposed a modification which will retain the removal of the word "phasing" proposed in MM91 but to remove the additional "Grampian" in order to address this. Para 8.6 will read:

"In order to address wastewater treatment capacity, developers are encouraged to contact the water/wastewater infrastructure provider as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint, the Local Planning Authority will, where appropriate, apply phasing Grampian conditions to any approval to ensure that

any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

MM96 and MM97 – Sustainable transport

MM96-MM97, Strategic Policy 24: do the Council think it is necessary to refer to connections to networks beyond the District, in the interests of effectiveness?

25. The Council notes concern over the effectiveness of supporting text paragraph 8.14 in Crawley Borough Council's representation (ref /1354), which concerns making effective links between the West of Ifield proposed development and the Crawley LCWIP network.
26. The Council agrees that the modification to the supporting text could be strengthened and clarified to facilitate these links being implemented. The following wording is therefore proposed in place of the existing MM96 (paragraph 8.14):

The Council has worked with partners to produce a Horsham Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out cycling and walking network plans within a 5km radius of Horsham town centre, and a prioritised programme of improvements for future investment. Strategic Policy 24 expects development to have regard to this programme, as well as to any LCWIPs in neighbouring authorities and future LCWIPs ~~across the District~~, together with any relevant government guidance including LTN1/20 – Cycle Infrastructure design, or any future updates. Where the LCWIP networks, both within and outside the District, provide potential links to a development, the applicant should contribute to delivering or improving that part of the network.

MM107 – Community facilities, leisure and recreation

MM107, Policy 28: the policy tends to conflate the open space/recreation criteria with those for other community facilities. It is suggested that the Council inserts the policy as set out in paragraph 103 of the December 2023 NPPF.

27. For the avoidance of doubt and confusion, given that the Local Plan is being examined under the September 2023 NPPF, it is noted that paragraph 103 of the December 2023 NPPF is identical to paragraph 99 of the September 2023 NPPF. The policy does purposefully cover both open space/recreation and other community facilities – to split these out would require substantial restructuring of this part of the Plan. It is not considered that this would be required for soundness.
28. Separately, the Council does not consider it appropriate to duplicate paragraph 99 in the September 2023 NPPF as any application will be assessed against the latest amended NPPF (August 2026) including Policies HC6 and HC7. It is noted that in the Sep 2023 NPPF, paragraph 16(f) explains that plan policies should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in Framework, where relevant). The Council also considers that Policy 28, as modified, aligns with the latest NPPF as further explained below.
29. Whilst not worded identically, criterion 3a in Policy 28 is considered to broadly accord with both criteria b and c of paragraph 99 of the NPPF. The Council considers that the use of the word ‘capacity’ in place of ‘quantity’ better reflects the nuanced considerations of planning applications in the context of the Council's evidence base. Notwithstanding, the Council would consider alternative wording if the Inspector considered this necessary to achieve soundness.
30. It is acknowledged that Policy 28(3b) requires evidence of a lack of feasibility as a community use, which is not explicitly required by (Sep 2023) NPPF paragraph 99 dealing specifically with open space and sports/recreation. However, the new (Aug 2026) NPPF includes Policy HC6 which, in criterion 1a, require applicants to demonstrate that there is no reasonable prospect of the community facility use being retained, including due to being no longer viable or feasible to operate. The (Aug 2026) NPPF Glossary confirms that community facilities include allotments and facilities for play, sport and

recreation. Hence Policy 28 is considered to align with the new NPPF when HC6 and HC7 are read as a whole.

31. In summary, the Council does not consider it necessary or appropriate to substantially restructure, re-write or duplicate NPPF wording within the policy, but would welcome further clarity from the Inspector with regards appropriately worded criteria which aligns with national policy.

MM121 – Enhancing existing employment (Thakeham Parish)

MM121, Strategic Policy 30: (i) should the Thakeham Mushroom Site be protected for employment purposes? (ii) Should the Thakeham Tiles site be shown as outside the settlement boundary?

32. (i) With regard to the former Thakeham Mushrooms site the council does not considered a modification to Strategic Policy 30 is necessary or appropriate. The Thakeham Neighbourhood Development Plan (2017-2031) (TNP) was made on January 2017 and forms part of the Development Plan. Policy 3 of the TNP specifically relates to the development of the site and sets out the types of development expected. The former Thakeham Mushrooms site closed as a business in 2022. An appeal relating to a planning application for 247 dwellings and a local centre (flexible Class E Uses) (DC/24/0021) was dismissed following a public hearing. There is now a pending planning application for 150 dwellings (DC/26/0266). Whilst the Council has in the past sought to support the site's ongoing employment use, it must also have regard to the fact that the business that used to occupy the site became unviable, and it has not proposed to include the site as a key employment site. Nevertheless, Strategic Policy 30 criterion 7 which requires evidence of non-viability for employment would still be material to any planning application. An amendment to Strategic Policy 30 to identify the site as a Key Employment Area is not considered to be justified.
33. (ii) With regard to the Thakeham Tiles site the council does not considered a modification to Strategic Policy 30 is necessary or appropriate. The site currently lies within the built up area boundary as defined by the currently adopted Horsham District Planning Framework (2015) (HDPF). In view that Policy Thakeham 2 of the Thakeham Neighbourhood Development Plan (2017-2031) (TNP) allocates the site for housing it is considered appropriate for it remain within the built up area boundary. It is noted that the owners/promoters of the site seek an amendment to the built up area boundary to include land with trees at the entrance in their representation to MM244 (Response ID: 1493), which relates to Strategic Policy HA18: Storrington and Sullington housing allocations. These trees are covered by a Tree Preservation Order and the Council is not aware of any change in circumstance that suggest this area is developable nor should form part of any development of the Thakeham Tiles site.

MM127 – Conversion of agricultural and rural buildings

MM127, Policy 32: should the policy contain a requirement to survey for protected species to ensure consistency with paragraph 9.34?

34. The Council have reviewed the representations received in relation to MM127. With regards to this question, we look to specifically address comments made by Natural England (comment ID/886) who object to the main modification as currently drafted, and request an additional criterion to be added to the policy to align with NPPF (2026) paragraph N2, criteria 1f and 2:

“Developments will provide a survey for protected species by a suitably trained/licensed individual for protected species conducted at a suitable time of year with measure to protect and retain these species built into the development plans.”

35. Strategic Policy 17: Green Infrastructure and Biodiversity contains specific requirements in relation to protected sites and species. This requirement has been strengthened by main modification MM80 which amends the wording of criterion 8 of the policy. The Council are of the view that, with the proposed Main Modifications, Strategic Policy 17 is compliant with NPPF (2026). Given that the Local Plan should be

read as a whole, it is the view of the Council that combined paragraph 9.34 and Strategic Policy 17 sufficiently address the consideration of protected species.

36. We therefore do not propose to amend the wording of the policy.

MM249, MM250, MM256, MM261 – Glossary definitions

MM249, MM250, MM256, MM261, definitions: should the definitions be based on the titles in the NPPF glossary?

37. Regarding MM249 the NPPF glossary does not include a definition of age restricted housing, however the Planning Practice Guidance uses the title 'Age Restricted General Market Housing'. It is therefore proposed that the title and definition in MM249 are further modified to precisely align with Planning Practice Guidance, as follows:

"Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services."

38. Regarding MM250 the NPPF glossary does not include a definition of assisted living housing. However, the Planning Practice Guidance uses the title 'Retirement Living or Sheltered Housing'. It is proposed that the definition is modified to refer to the definition for 'Retirement Living or Sheltered Housing' as per MM261, and to the definition for "Extra care housing or housing with care" as per MM256 below. The entry will read:

"Assisted Living Housing: See 'Retirement Living or Sheltered Housing' and 'Extra care housing or housing with care'"

39. Regarding MM256 the NPPF glossary does not include a definition of extra care housing. However, the Planning Practice Guidance uses the title 'Extra care housing or housing-with-care'. The title and definition will be further modified accordingly and reproduce the PPG definition in full as follows:

"Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses."

40. Regarding MM261 the NPPF glossary does not include a definition of retirement living. However, the Planning Practice Guidance uses the title 'Retirement Living or Sheltered Housing'. The title and definition will be further modified accordingly as follows:

"Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager."

"Sheltered housing: See Retirement living or sheltered housing"

Inspector's questions concerning the site allocations

HA6 Barns Green

To what extent would the submitted plan and main modifications differ from the Neighbourhood Plan and how would the two work together in the future?

41. Barns Green lies within the parish of Itchingfield; the Itchingfield Neighbourhood Plan was made 8 October 2025 and includes two allocations for housing (52 dwellings):

- Sumners Ponds Site (Policy 9) – proposals provide around 32 dwellings incorporating a mix of dwelling types and size to meet the needs of current and future households;
- Old School Site (Policy 10) – proposals provide around 20 dwellings incorporating a mix of dwelling type and size to meet the needs of current and future households.

Of the two sites, Sumners Pond has approved planning application DC/21/2697 (32 dwellings, including 35% affordable, 6 commercial units and 1 reception building), of which 13 dwellings have been built. To date, the Council have not received an application for the allocated Old School Site.

42. The submitted Local Plan includes three proposed allocations, which equates to 95 dwellings:

- BGR1: Land South of Smugglers Lane (50 homes)
- BGR2: Land South of Muntham Drive (25 homes)
- BGR3: Land at the Old School Site (20 homes)

43. At the time of publication of the Regulation 19 document, and the date of submission of the Local Plan (July 2024), the Itchingfield Neighbourhood Plan had not as yet been subject to referendum nor 'Made'. As no application had been received for Land at the Old School site, it was therefore included as an allocation within the Horsham District Local Plan 2023-2040 to provide additional certainty that the site could come forward during the plan period, and ensure community aspirations for development were reflected in the Local Plan.

44. The Schedule of Main Modifications proposes the allocation of an additional site to those listed in the submission plan, Land at the Rear of Two Mile Ash Road (10 homes), to ensure that the plan can meet the increased housing targets following the withdrawal of water neutrality. Although Itchingfield Neighbourhood Plan was 'Made' at the time of publication of the Main Modifications, the Council were of the view that Land at the Old School Site should remain as a local plan proposed allocation, as was the case for sites allocated in other in Neighbourhood Plans subject to the same position.

45. In terms of Land at the Old School Site, BGR3 refers applicants to the wording of policies contained within the Neighbourhood Plan, including site specific policies. It is acknowledged, however, that at present policy BGR3, as shown in the Appendix 2, Schedule of Main Modifications (MM230) is struck through indicating the removal of policy text. This is not correct and the wording of the policy must be reinstated.

46. With regards to how the two documents will work together in the future, the Council will jointly consider policies contained within the Itchingfield Neighbourhood Plan and the adopted Local Plan. It should however be noted Section 38 (5) of the Planning and Compulsory Purchase Act would apply if any conflict between plans is identified as follows:

"If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document"

This would mean that if Neighbourhood Plan policies conflict with the Local Plan, it will be the local plan policies which take precedence.

Site BGR 1: I understand that planning permission has been refused for the development of this site. What does the Council expect of development here and does Policy BGR1 accurately and fairly reflect those expectations?

47. Horsham District Council and the promoters of the BGR1 site have prepared a statement of common ground which sets out the shared position. This Statement clarifies that the reasons for refusal were due to the design and appearance of the development, and issues with the foul sewerage capacity from Southern Water to service the development. There was no concern raised with the principle of the development.
48. The Council are of the view that any future proposal can address design concerns. In addition to the criteria set out within the allocation policy, Strategic Policy 19: Development Quality (**MM84**) sets out the design expectations for any new proposal.
49. With regards to sewerage capacity, part of the reason for refusal related to unproven wastewater capacity. Engagement with Southern Water through the preparation of the Local Plan and the IDP (**HDCJB19**) has not identified concerns with capacity of the wastewater network in this area. A planning condition relating to the phasing of development was agreed by Southern Water in response to ongoing assessment of local wastewater treatment works, requiring development to be aligned with necessary network reinforcements. This accords with the approach to infrastructure provision set out in Policy 23: Infrastructure Provision. A modification to the supporting text of Policy 23 has been proposed which sets out the statutory duties of organisations such as Southern Water to ensure infrastructure is in place to support and serve development. It is not considered any updates are required in relation to BGR1.
50. Given the local plan should be read as a whole, the Council's position is that combined, BGR1, Strategic Policy 18 and Policy 23 accurately reflects the expectations of delivery of this site and that the issues raised are matters capable of being resolved at planning application stage.

Site BGR4: MM230 requires the use of the southern section of the site for sport and recreation. Is this in excess of what is required to make the development acceptable given the numerically small size of the allocation? Can the Council's offer a simple text amendment / explanation to set out its expectations here?

51. Access to the southern section of Land at the Rear of Two Mile Ash Road (BGR4) is constrained by a number of arboriculture features; Ancient Woodland runs along the northern boundary of the southern field, with half of the woodland additionally designated as a Priority Habitat. Access to the southern field directly from the northern section of the site is not possible due to the requirement of at least a 15 metre buffer zone from the boundary of the woodland to avoid root damage.
52. Tree Preservation Orders are present on the south-eastern corner and southern boundary of the same field, as well as a section of Priority Habitat (Traditional Orchard) is also present adjacent to the southern boundary. Buffer zones and Root Protection Areas would also be required limiting the developable area, including access from the southern boundary.
53. Itchingfield Parish has a significant open space shortfall against the Open Space, Sport and Recreation Review (2021) standards, equating a combined deficit of 5.41 hectares. Given this shortfall of open space, combined with the physical constraints for development on the southern section of the field, the Council are of the view that the criteria requirement within the policy is appropriate. In addition, the inclusion of publicly accessible open space, with the incorporation of buffer zones around the constraints will conserve and enhance these natural features as well as contribute to Biodiversity Net Gain.

To what extent would the submitted plan and main modifications differ from the Neighbourhood Plan and how would the two work together in the future?

54. The Cowfold Neighbourhood Plan was made 8 October 2025 and includes two allocations for housing (70 dwellings):

- Brook Hill, CNP01 (Policy 11) – Proposals up to 35 residential units
- Potters, CNP03 (Policy 12) – Proposals up to 35 residential units

55. The submitted Local Plan includes two proposed sites, which equates to 70 dwellings:

- CW1: Field West of Cowfold, North of A272 (35 homes)
- CW2: Fields West of Cowfold, South of A272/Field West of Cowfold, South of A272 (35 homes)

56. At the time of publication of the Regulation 19 document, and the date of submission of the Local Plan, the Neighbourhood Plan had not as yet been 'Made'. With regard to site CW2, the allocation boundary reflects that of Potters, CNP03 (Policy 12), incorporating both development and community space, as depicted on the Neighbourhood Plans Policies Map. The site allocation was included within the Horsham District Local Plan 2023-2040 to ensure that the site could come forward during the plan period.

57. The Schedule of Main Modifications allocated an additional site to those listed in the submission plan, CW3: Land east of Cowfold (100 homes), to ensure that the plan can meet the increased housing targets following the withdrawal of water neutrality. Although Cowfold Neighbourhood Plan was 'Made' at the time of publication of the Main Modifications, and an application DC/24/098 (35 dwellings) had been permitted for proposed allocation CW2, the Council were of the view that, given no dwellings have been built out to date, the allocation should remain in the local plan, as was the case for sites allocated in other in Neighbourhood Plans subject to the same position.

58. With regards to how the two documents will work together in the future, the Council will jointly consider policies contained within the Cowfold Neighbourhood Plan and the adopted Local Plan. It should however be noted Section 38 (5) of the Planning and Compulsory Purchase Act would apply if any conflict between plans is identified as follows:

"If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document"

This would mean that if Neighbourhood Plan policies conflict with the Local Plan, it will be the local plan policies which take precedence.

Under the first part of Strategic Policy HA8 the total number of homes would be 170, not 100.

59. The Council can confirm that the provision for Cowfold equates to at least 170 homes, shared over three separate sites, as detailed within the allocation descriptions. The Council proposes to amend the wording of the first sentence of criterion 1 as a main modification as follows:

"1. The following sites are allocated, as shown on the Policies Map, for the provision of at least ~~70~~ 170 homes:"

Site CW3, MM232: What are the Council's expectations regarding the design on development of this site, how through design it might be integrated with the village, adequately address the recreation ground and avoid appearing as a separate and isolated scheme? Can the Council's offer a simple text amendment / explanation to set out its expectations here?

60. As outlined in the Site Assessment for Land East of Cowfold (**HDCJB14c**), the Council considers the site to be a sustainable and logical extension in accordance with Strategic Policy 3: Settlement Expansion (SD01) with local services and facilities, within reasonable walking distance, located to the west of CW3 and Oakendene Industrial Estate located to the east of the village which may provide potential employment. The site lies adjacent to existing residential development, both to the north and south, and with the recreation ground adjoining the western boundary the allocation would be well related to the existing settlement form.
61. It is the expectation of the Council that the development promotes a high standard of design, architecture and landscape, contributing to the identity or 'sense of place' of Cowfold and ensuring that the local, social and environmental characteristics are considered. The proposal should be landscape led, incorporating a 15 metre buffer zone around Horse Wood (designated Ancient Woodland and priority deciduous woodland, as listed under Natural England's Priority Habitats Inventory), which is located to the north-east of the site, as well as appropriate Root Protection Areas (RTA) to other well-established trees and hedgerows both adjoining and within the site boundary. This integration will not only mitigate any potential impacts on important physical and environmental features but will also help to enhance the areas and provide essential Biodiversity Net Gain.
62. A Public Right of Way (PRoW) ref.1749 adjoins the north-west corner of the site and provides access to the recreation ground, as well as the Allmond Centre (multi-use community facility and sports pavilion) and other services and facilities located on the main route through the village. The site itself already has an established informal path directly connecting the PRoW and any development would need to enhance the connectivity of the site per criteria set out in Strategic Policy 24: Sustainable Transport. To make this expectation clear, the Council propose to the following additional criteria as a main modification:

"b) Any proposal should enhance connectivity with existing Public Right of Way route 1749. Enhancement of pedestrian and cycle linkages will be supported."

All subsequent criteria should be re-numbered.

63. In addition to the criteria contained within CW3, key policies Strategic Policy 3: Settlement Expansion, Strategic Policy 19: Development Quality, Strategic Policy 24: Sustainable Transport and Policy 28: Community Facilities and Uses (criterion 2) clearly set out the Council's expectations for this proposal.

HA12 Partridge Green

What is the Council's response to the WSCC representation seeking contributions to mitigate impacts on A272/A281 roundabout?

64. Whilst the Council fully appreciates the need to mitigate highway related improvements which will be required as a result of new developments, we are of the view that this is a matter for detail as part of the planning application, future decisions on allocating CIL finds and, if consistent with CIL Regulation 122, Section 106 agreement. There is not considered to be sufficient evidence to conclude that it is necessary or appropriate for inclusion within the allocation policy. The Council's approach for this policy is consistent with other settlement allocation policies, for example Henfield (HA9).

Site PG4, MM237: Under criterion (b), what is meant by "enhance connectivity with"? If there is no direct access to RoW 2800 how would a proposal comply?

65. Following a review of the site boundary, together with the fact that Public Right of Way (PRoW) ref.2800 does not directly adjoin the site allocation of Land at Dunstons (PG4), the Council propose a minor modification to the wording of PG4 criterion (b), with the removal of reference to PRoW 2800, to read as follows:

"b) Any proposal should enhance connectivity with the existing Public Right of Way route 1761. Enhancement of pedestrian and cycle linkages will be support;"

It appears that the extent of the additional Housing Allocation BL1 might have been inaccurately shown on the Policies Map. It occupies one field whereas a larger site area covering two fields appears on the Site Assessment Report Update (HDJB14c pp 7-9). The proposed number of homes in Strategic Policy HA(NP2): BL1 appears consistent with the larger scheme. Please can the Council comment on the correct position.

If the depiction of site allocation BL1 on the Policies Map is inaccurate, it needs to be corrected. This would not amount to a main modification because the Policies Map does not form part of the development plan, the Council's intention regarding the site is clear from Strategic Policy HA(NP2): BL1 and the Site Assessment Report Update, and the policy itself would not change.

66. Having reviewed the Policies Map (both interactive and PDF Inset Map no.4) the Council can advise that the proposed allocation BL1 was indeed incorrectly depicted. As a result, the Policies Map will be updated to include the correct site boundary, as illustrated in the Site Assessment Report Update (HDJB14c, page 7).

Schedule of Proposed Mods

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
MM38	4	4.37	Amend to read: <u>This policy also provides the context for considering proposals in the event that any further shortfall in meeting identified development requirements should arise.</u>	The Council agrees with the Inspector's suggested amendment.
MM39	4	Strategic Policy 3	Amend criterion 2 to read: The level of expansion is appropriate to the scale and function of the settlement type <u>and development is well related to the settlement boundary and to transport facilities.</u> Amend criterion 3 to read: "The development is demonstrated to meet <u>evidenced unmet</u> local housing needs or..."	The Council agrees with the Inspector's suggested amendment.
MM47	5	Para 5.12	Existing buildings contain embodied carbon (i.e. carbon that was emitted during the construction process) and so it is important that this already emitted carbon is not wasted through the needless demolition of existing structures. Where demolition is unavoidable, applications will be required to demonstrate how the on-site embedded carbon has been retained; therefore, proposals should take advantage of opportunities to reuse existing structures and materials.	The Council agrees with the Inspector's suggested amendment.

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
MM48	5	Strategic Policy 8: Sustainable Design and Construction	Amend criterion 1.b) to read: <u>Take advantage of opportunities to reuse existing structures and materials, including the reuse of non-contaminated excavated soil and hardcore within the site.</u> Subsequent criteria would be renumbered.	The Council agrees with the Inspector's suggested amendment.
MM61	5	Strategic Policy 10	Amend criterion 5 to read: <u>Development should consider the potential for site specific flood and hydraulic modelling to inform the developability, design and layout of the site.</u>	The Council agrees with the Inspector's suggested amendment.
MM67	6	6.16	Delete in entirety paragraph 6.16 from its current location (amended and moved to text supporting Strategic Policy 17).	The Council agrees with the Inspector that the paragraph (as amended) fits better with SP17.
MM67	6	New para to follow 6.57	New paragraph constituting some of the wording previously in para 6.16 together with additional text, to read: <u>Where development would have likely significant effects on The Mens SAC air quality, mitigation measures will be required to ensure that it will have no adverse effect on the integrity of the area. In designing mitigation measures, regard should be had to the Horsham and Chichester Local Plans Air Quality Strategy (AECOM, September 2024) which sets out actions to ensure there is no adverse effect on the integrity of The Mens SAC, especially from ammonia pollution. The Council will monitor emissions on the A272 at The Mens SAC. Horsham and Chichester District Councils will use Automatic Number Plate Recognition (ANPR) monitoring on the A272, passing The Mens SAC, to</u>	The Council agrees with the Inspector's suggested amendment.

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
			<u>track how many ultra-low emission vehicles (ULEVs) are being used over time. Should it become evident through monitoring that emissions arising from vehicle movements from proposed developments, individually or in combination, are likely without mitigation to affect the integrity of the SAC, the Council will seek mitigation measures through conditions and/or planning obligations attached to planning permissions. This will be in addition to the mitigation measures already specified in the Local Plan in respect of development East of Billingshurst. The councils will also keep working with Natural England and other groups to explore other mitigation options.</u>	
MM67	6	Strategic Policy 17	Amend criterion 13 to read: Any development with the potential to impact the Arun Valley SPA / SAC / Ramsar site, The Mens SAC and / or Ebernoe Common SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the Habitat Regulation Assessment of this Plan. <u>New development for which it is not possible to conclude no adverse effect on the integrity of these sites either alone or in combination with other plans or projects, taking into account any proposed mitigation measures, will not be permitted. Where necessary, such as in response to monitoring and updated evidence, mitigation measures will be required and secured through conditions and/or planning obligations attached to planning permissions.</u>	The Council agrees with the Inspector's suggested amendment together with additional clarifications to ensure account can be taken of proposed mitigation measures, and to be clear on means of implementing mitigation through the development management process.
MM82	7	7.3	Amend paragraph to read: For development to be sustainable, good design is essential. It will need to draw on local, social and environmental characteristics alongside visual and functional concerns. This includes ensuring that the design of development takes account of the needs of residents. In Horsham	The Council agrees with the Inspector's suggested amendment.

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
			District this is likely to see increased elderly populations who may experience more mobility difficulties – development (including street design) should be designed to be accessible for all including those requiring wheelchairs. Evidence also shows that males and females do not always use space in the same way. And development should be designed to ensure the needs of girls/ teenagers can also be provided. ⁶ <u>Development should therefore include spaces that are safe, secure, inclusive and accessible for all ages and abilities, including groups such as women and girls; and which facilitate and encourage social interactions, play and healthy lifestyles.</u> Good design will ensure that development enhances and compliments local character, landscape and open spaces, and ensure that environmental mitigation is incorporated into development. Ultimately, good design should achieve vibrant and functional communities with a distinctive ‘sense of place’.	
MM84	7	Strategic Policy 19: Development Quality	Amend criterion 1(f) as drafted in MM84 to read: Retains existing <u>good quality</u> landscape belts, trees, hedgerows and watercourses that form the <u>where they contribute to the</u> character of the landscape.	The Council agrees with the Inspector’s suggested amendment.
MM90-MM93	8	8.2 including new paragraphs	8.2 Much of the infrastructure needed to support development is not provided directly by the Council. <u>A range of organisations are responsible for its provision and maintenance, including the NHS, West Sussex County Council, water and drainage authorities, electricity providers and other statutory undertakers.</u> Horsham District has a strong track record of actively engaging with infrastructure providers, <u>developers and other groups</u> to ensure that the needs of the residents and businesses in the District are met. This ranges from public sector partners such as the NHS on health care, West Sussex County Council on matters such as education and transport, and key utilities providers such as Southern Water, together with developers who are promoting development. This ongoing work has helped to bring forward	To provide clarification on the statutory duties of the water authorities, drainage authorities and other statutory undertakers and the context in which the policy will operate.

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
			enhancements and upgrades across the District, which have, over the years, included the redevelopment and expansion of Piries Place in Horsham, The Bridge leisure centre in Broadbridge Heath, and an upgraded Health Care centre in Steyning. <u>8.3 Many infrastructure providers have statutory duties, powers and responsibilities established through legislation and regulatory frameworks which operate independently of the planning system. For example, water and sewerage undertakers, such as Southern Water and Thames Water, have statutory duties to plan, provide, operate and maintain water supply and sewerage infrastructure in their areas of operation to meet the needs of existing and future customers.</u> <u>8.4 Lead Local Flood Authorities, the Environment Agency and other relevant bodies have responsibilities relating to flood risk management, drainage and watercourses and play an important role in ensuring that development can be delivered in a manner that minimises flood risk. Other statutory undertakes, including energy providers and telecommunications network operators have a responsibility to provide and maintain infrastructure to support development.</u> <u>8.5 Infrastructure investment programmes are often planned over long timescales and require coordination between infrastructure providers, local planning authorities and developers. While the Local Plan seeks to facilitate the delivery of infrastructure necessary to support planned growth, it does not impose obligations on statutory providers that would duplicate, override or undermine responsibilities established through legislation or regulatory frameworks.</u> <u>8.6 Development should be informed by early engagement with infrastructure providers to ensure that adequate capacity can be provided to serve the development and that, where improvements and new provision is required, applicants should demonstrate how this will be coordinated with the relevant provider. The Council will continue to work proactively and collaboratively with statutory undertakers and</u>	

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
			<u>infrastructure providers and neighbouring authorities to support the delivery of infrastructure required to accommodate sustainable growth.</u>	
MM91	8	8.6	Amend paragraph to read: In order to address wastewater treatment capacity, developers are encouraged to contact the water/wastewater infrastructure provider as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint, the Local Planning Authority will, where appropriate, apply phasing Grampian conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.	The Council agrees with the Inspector's suggested amendment.
MM96	8	8.14	Amend paragraph to read: The Council has worked with partners to produce a Horsham Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out cycling and walking network plans within a 5km radius of Horsham town centre, and a prioritised programme of improvements for future investment. Strategic Policy 24 expects development to have regard to this programme, as well as to any <u>LCWIPs in neighbouring authorities and future LCWIPs across the District</u>, together with any relevant government guidance including LTN1/20 – Cycle Infrastructure design, or any future updates. <u>Where the LCWIP networks, both within and outside the District, provide potential links to a development, the applicant should contribute to delivering or improving that part of the network.</u>	Wording strengthened and clarified to facilitate these links between West of Ifield and the Crawley LCWIP networks.

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
MM249	Glossary		Amend title and definition to read: <u>"Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services."</u>	To ensure Glossary and definition align with NPPF glossary
MM250	Glossary		Amend title and definition to read: <u>"Assisted Living Housing: See 'Retirement Living or Sheltered Housing' and 'Extra care housing or housing with care'."</u>	To ensure Glossary and definition align with NPPF glossary
MM256	Glossary		Amend title and definition to read: <u>"Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses."</u>	To ensure Glossary and definition align with NPPF glossary
MM261	Glossary		Amend titles and definitions to read: <u>"Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live</u>	To ensure Glossary and definition align with NPPF glossary

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
			<u>independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.</u> <u>“Sheltered housing: See Retirement living or sheltered housing”</u>	
MM230	10	HA6: Barns Green	Amend BGR3 as drafted in MM230 to read: <u>BGR3</u> a) <u>Comply with any policies, including site specific policies, in a Made Itchingfield Neighbourhood Plan.</u>	At present, BGR3 criterion, is shown as a deletion of text (depicted as a strikethrough) in MM230. This is not correct and wording must be reinstated.
MM232	10	HA8: Cowfold	Amend first sentence of criterion 1, as drafted in MM232, to read: 1. The following sites are allocated, as shown on the Policies Map, for the provision of at least 400 <u>170</u> homes:	To reflect correct total number of homes, allocated on three separate sites, as detailed within Strategic Policy HA8: Cowfold
MM232	10	HA8: Cowfold	Add additional criterion to CW3 to read: b) <u>Any proposal should enhance connectivity with existing Public Right of Way route 1749. Enhancement of pedestrian and cycle linkages will be supported.</u>	To make clear the Council's expectations in terms of design and connectivity of the allocation.
MM237	10	HA12: Partridge Green	Amend criterion (b) of PG4 as currently drafted in MM237 to read: Any proposal should enhance connectivity with the existing Public Right of Way routes 1761 and 2800. Enhancement of pedestrian and cycle linkages will be supported.	Amend policy wording as site does not have any direct access to Public Right of Way 2800, as queried by the Inspector.

Reference	Chapter	Paragraph / Policy Number	Suggested Change	Reason
-	Policies Map	Site BL1 (New Policy after HA6 and before current HA7)	Update Policies Map, both interactive and PDF Inset Map 4, to correctly depict site boundary of allocation BL1	Update Policies Map to correctly depict site boundary as illustrated in the Site Assessment Report Update (HDJB14c, page 7)

Appendix: Natural England confirmation re: policy wording

Ed.Cornew

From: Nancy Warne [REDACTED]
Sent: 22 September 2026 17:04
To: Matt.Bates
Cc: Norman.Kwan; Marian Ashdown
Subject: RE: Air Quality & The Mens

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Matt,

Thank you for the meeting yesterday and for your email below.

We can confirm that this is an accurate representation of our discussions and that we welcome the additional wording that your LPA proposes (underlined text). As discussed on our call, this is without prejudice to our previous responses to the Reg 19 consultation and associated HRA and noted concerns about AQ mitigation measures.

With best wishes,
Nancy

Nancy Warne MRTPI

Senior Officer
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Sussex and Kent Area Team

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[REDACTED]

www.gov.uk/natural-england

Do you want to give customer feedback to Natural England?



Please note: I am currently on a flexible working pattern. My response times & attendance to meetings may vary due to managing a family member's care.

From: Matt.Bates [REDACTED]
Sent: 21 September 2026 17:18
To: Nancy Warne [REDACTED]
Cc: Norman.Kwan [REDACTED]; Marian Ashdown [REDACTED]
Subject: Air Quality & The Mens

Dear Nancy,

Many thanks to yourself and Marian for meeting us today. It was helpful to discuss the Inspector's suggested wording for Main Modification MM67 and hear your thoughts on it.

As discussed, the Council has drafted alternative wording to align with the Inspector's suggested wording. The Council proposes to move the relevant supporting text to form supporting text and policy wording to Strategic Policy 17 – Green [and Blue] Infrastructure and Biodiversity.

The Inspector indicates that the first sentence in his wording goes into the policy box – we propose this follows on from current criterion 13. We discussed the Council's proposed additions to the Inspector's wording and you indicated that, notwithstanding the objection in principle, you welcomed the additions. SP17 part 13 would, with the Council's changes, read:

13. Any development with the potential to impact the Arun Valley SPA / SAC / Ramsar site, The Mens SAC and / or Ebernoe Common SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the Habitat Regulation Assessment of this Plan. New development for which it is not possible to conclude no adverse effect on the integrity of these sites either alone or in combination with other plans or projects.

taking into account any proposed mitigation measures, will not be permitted. Where necessary, such as in response to monitoring and updated evidence, mitigation measures will be required and secured through conditions and/or planning obligations attached to planning permissions.

With regards the remainder of the Inspector's wording – starting “Where development would have likely significant effects on The Mens SAC air quality...”, I can confirm that the Council supports the form of wording proposed by the Inspector and does not propose further changes.

Can I ask that you confirm I have correctly captured our discussion in the above, and kindly confirm your support (without prejudice to wider objections) for the additional wording proposed by the Council?

Many thanks, kind regards

Matt Bates (he/him)

Planning Policy Team Leader

Telephone: [REDACTED]

Email: [REDACTED]



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