

A2Dominion Developments Limited

Hearing Statement

Matter 6f: Strategic Policy HA18 Storrington Housing Allocations

Date of report: September 2026

PREPARED FOR

a2dominion 

savills

Contents

1.	Introduction.....	2
2.	Emerging Strategic Policy HA18.....	3
3.	Conclusion.....	5

Document History

Issue	Date	Issued by	Comment
1.0	24/09/2026	HK	Draft Issue
2.0	24/09/2026	HK	Final Issue

1. Introduction

- 1.1 This Statement has been prepared by Savills, on behalf of A2Dominion Developments Limited (herein referred to as 'A2Dominion'), in response to **Hearing Matter 6f concerning Strategic Policy HA18: Storrington Housing Allocations**. It draws upon the evidence submitted throughout the Local Plan process, including the Regulation 19 representations, supporting technical evidence, and responses to the Main Modifications consultation.
- 1.2 As discussed in A2Dominion's submitted Main Modifications response, Strategic Policy HA18 has been proposed to be modified (MM244) by Horsham District Council (HDC) to include additional site allocations to ensure the emerging Local Plan can meet its increased housing targets. This includes STO5: Land at Bax Close (herein referred to as 'the Site') which A2Dominion control.
- 1.3 Planning permission for 30 dwellings at the Site was granted at Appeal on 31 July 2026 (Appeal ref: 6005400). The approved description of development is as follows:
- "Erection of 30 No. residential units with associated landscaping, public open space, earthworks, drainage, access and all other associated infrastructure."*
- 1.4 The Appeal Decision, and in particular the Inspector's findings regarding arboricultural matters, is a material consideration when assessing the interpretation and application of the policy wording attributed to STO5: Land at Bax Close. This issue is discussed further in Section 2 of this Statement.

2. Emerging Strategic Policy HA18

- 2.1 A2Dominion supports the allocation of Land at Bax Close (STO5) within emerging Strategic Policy HA18. The allocation will contribute towards Horsham's revised housing requirement, following the removal of water neutrality restrictions and the Inspector's guidance that the Plan should make additional provision for neighbouring authorities' unmet housing need.
- 2.2 However, whilst A2Dominion strongly support the principle of an allocation for the Site, an objection is made to the policy criteria, specifically Criterion B under site allocation STO5. Criterion B requires that *"all areas of ancient woodland, veteran trees and trees subject to Tree Preservation Orders (TPOs) shall be retained and protected"*, before separately requiring *"a minimum undeveloped buffer of at least 15 metres, measured from the woodland edge"*.
- 2.3 Paragraphs relating to plan-making within the National Planning Policy Framework (NPPF) require planning policies to be clearly written, unambiguous and supported by appropriate evidence. Policies should provide a clear indication of how decision-makers should react to development proposals and should be founded on proportionate evidence.
- 2.4 The wording is presently unclear as to whether the 15m buffer is intended to apply solely to ancient woodland, or whether it is also intended to extend to non-designated woodland, veteran trees, and TPO trees. A buffer can only reasonably be applied to ancient woodland, under the statutory guidance of Natural England. There are no national or local requisites that designate a standardised buffer of 15m between non-designated woodland, veteran trees, and TPO trees. A2Dominion therefore consider it unjustified for the buffer to apply to anything other than ancient woodland.
- 2.5 For the avoidance of doubt, there is no ancient woodland within or adjacent to the Site, meaning the buffer's reference point is not applicable for STO5. On this basis, A2Dominion consider that the reference to a 15m buffer should be removed altogether, since its inclusion in the policy is not justified by any national or local policy, nor any evidence gathered.
- 2.6 Significant weight should be afforded to Appeal ref: 6005400 given that it relates to the allocated site and represents the most recent planning judgement regarding the suitability of development. In determining the Appeal, the Inspector accepted that development could proceed, notwithstanding acknowledged impacts on a protected tree (referred to as T2), as a result of the proposed access, subject to appropriate mitigation and management measures. In allowing the Appeal, the Inspector accepted that the proposed development could result in the eventual loss of the protected tree. The Inspector subsequently amended Condition 22 to expressly allow for the potential removal of T2.
- 2.7 A2Dominion fully supports the protection of trees which make a significant contribution to local amenity. However, the existence of a Tree Preservation Order does not establish an absolute prohibition on development, nor does it require the retention of every protected tree in all circumstances. The emerging policy wording currently requires that all trees subject to Tree Preservation Orders *"shall be retained and protected"*. Whilst well intentioned, this requirement is unnecessarily absolute and fails to recognise that exceptional site-specific circumstances may arise where development impacts on a protected tree cannot be wholly avoided, as raised in the Inspector's decision for Appeal Ref. 6005400.
- 2.8 Criterion B should therefore allow for flexibility where site-specific evidence demonstrates that impacts can be appropriately mitigated and where retention is not feasible despite the implementation of reasonable arboricultural measures.

- 2.9 Notwithstanding the objection to Criterion B, A2Dominion strongly supports the allocation of the Site for residential development, recognising its contribution to housing delivery in Storrington. Provided the changes below are made to Criterion B, Strategic Policy HA18 is considered justified, effective, and capable of delivery.
- 2.10 Strategic Policy HA18 part STO5 should be amended to read as follows*:
- a) *Any proposal should be design and landscape-led with regard given to the setting of the South Downs National Park. The layout, density and form of development must provide a sensitive transition to the open countryside;*
 - b) *All ~~areas of ancient woodland, veteran trees and~~ trees subject to Tree Preservation Orders shall be retained and protected **unless otherwise justified**. ~~A minimum undeveloped buffer of at least 15 metres, measured from the woodland edge, shall be provided. No built development, including gardens, drainage features, or lighting, will be permitted within the buffer zone;~~*
 - c) *A travel plan should look to propose improvements to bus, cycling and pedestrian infrastructure;*
 - d) *Have appropriate regard given to the setting of the Grade II listed Cobb Court adjacent to the site; and*
 - e) *Have regard in the design and setting of development to the areas of the site affected by surface water flooding and appropriate mitigation is applied.*

** Proposed amendments included in red. Removal is sought on text with strikethrough. Additional wording sought is in bold and underlined.*

3. Conclusion

- 3.1 The allocation of STO5 will assist in maintaining housing delivery within Storrington and contribute towards meeting the District's increased housing requirement. The Site benefits from an extant planning permission and therefore represents a deliverable and sustainable source of housing supply. The principle of development has already been comprehensively assessed through the appeal process.
- 3.2 Most notably, a technical objection is made to Criterion B for allocation STO5 under emerging Strategic Policy HA18. It is unclear whether the required 15-metre buffer applies only to ancient woodland or also to non-designated woodland, veteran trees, and TPO trees, none of which are subject to a standardised buffer under national and local policy. As no ancient woodland exists within or is adjacent to the Site, A2Dominion consider the buffer requirement unjustified and HDC should remove the requirement from the Policy. Additionally, greater flexibility should be incorporated into Criterion B to reflect the approach taken to TPO trees within the Appeal Decision ref: 6005400 to provide greater flexibility. Suggested amendments to Policy HA18 are included in Section 2 of this Statement.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

savills