



Horsham  
District  
Council

# Horsham District Local Plan Examination

## Matters, Issues and Questions

Matter 9: Sites Allocated for Development in the  
Plan

Issue 2

November 2024

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## Issue 2: Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

1. The Council considers that all of the settlement site allocations and associated policies (**Strategic Policies HA5-HA21**) are sound. In summary, they are:
  - **Positively Prepared:** The policies propose to allocate sites that will assist with achieving housing requirements as identified by **Strategic Policy 37** of the **Horsham District Local Plan (SD01)**.
  - **Justified:** All allocations are supported by the findings of the **Site Assessment Report (H11)** and the **Sustainability Appraisal (SD03)**. **Topic Paper 1: The Spatial Strategy (HDC02)** provides an overview of the development strategy of the HDLP, particularly in the context of the allocation of smaller sites and settlement sustainability (**paragraph 5.11 to 5.14**), site selection, assessment and Sustainability is also addressed (**paragraph 5.15 to 5.23**). The level of development identified in the respective settlements are considered appropriate for each location as informed by the settlement hierarchy in **Strategic Policy 2** and **Settlement Sustainability Review (EN07)**.
  - **Effective:** The policies and the various criteria will ensure that proposals would come forward having due regard to particular site circumstances and would thus assist in achieving sustainable development.
  - **Consistent with National Policy:** The policies comply with objectives and policies within the **NPPF**, including those that encourage allocations for housing – such as **paragraph 68**.
2. Responses to specific questions on each site are found below. In a number of instances, the sites have been subject to planning applications. Where this is the case, the latest information for each relevant site is provided on such applications.
3. Do note that a suggested modification for all allocations has been proposed (**SM58** in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) so that the quantum of homes in the policies are described as approximate figures. The rationale for this is explained in another **Hearing Statement (Matter 9, Issue 1, Question 2)** and is not repeated below.

### Question 1: Is Strategic Policy HA5: Ashington Housing Allocation sound?

4. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to ASN1 is provided below.
5. Ashington Parish has a made neighbourhood plan from June 2021 and allocates 225 dwellings up to 2031 contributing positively to the housing supply. The Ashington Neighbourhood Plan<sup>1</sup> (ANP) is aligned with the HDPF (**HDC05**) with the allocation of ASN1 in the emerging Local Plan meeting additional housing need taking account of the end-date for the neighbourhood Plan being 2031 compared with the Local Plan end-date of 2040. The allocation of ASN1 is well placed in terms of locational sustainability, close to the heart of the village near the school and local services. One of the key aims of the neighbourhood plan is to develop a 'community cluster' where local services and community facilities are focused centrally in the village. ASN1 is situated adjacent to the 'community cluster'.

#### a) ASN1?

6. The Council considers the allocation of approximately 75 homes at Land East of Mousell Close to be sound. Ashington village is identified in the settlement hierarchy as a 'medium size village' supported by the **Settlement Sustainability Review (EN07, p10)** which assesses Ashington position in the hierarchy and the capacity of the village to take sustainable development. The site is assessed under

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<sup>1</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0019/108361/Ashington-NDP-Referendum-Version-24-March-21.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0019/108361/Ashington-NDP-Referendum-Version-24-March-21.pdf)

SA866 in the **Site Assessment Report Part C (H11) p116 -119** and the **Sustainability Appraisal (SD03a-SD03d) – SD03a (p66), SD03b - Paragraphs (8.378 – 8.386) p185** and **(SD03c) Appendix F p308**.

## Question 2: Is Strategic Policy HA6: Barns Green Housing Allocations sound?

7. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
8. The **Itchingfield Neighbourhood Plan<sup>2</sup>** is at an advanced stage of production, which at the time of writing has been subject to examination and a further supplementary consultation relating to the introduction of a water neutrality policy. HDC intends to bring it to a meeting of the Full Council in Spring 2025 to formally 'make' the neighbourhood plan, following a referendum. The Itchingfield neighbourhood plan allocates 51 dwellings.

### a) BGR1?

9. Land South of Smugglers Lane is allocated in the Local Plan under BGR1 for 50 dwellings. The site has been subject to site assessment under site reference SA006, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 140-142** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) - SD03a (p70) SD03b (Paragraphs 8.387-8.398)** Other key assessments include the **Cultural Heritage Assessment Part B (EN09) p74 – p86** - which examines the issue of a local heritage assets Grade II Listed Buildings (Bennetts, Blacksmiths Cottage and The Queen's Head Public House) located adjacent to the site. Through such assessments and the evidence base, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

### b) BGR2?

10. Land South of Muntham Drive is allocated in the Local Plan under BGR2 for 25 dwellings. The site has been subject to site assessment under site reference SA510, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 143-145** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) - SD03a (p70) SD03b (Paragraphs 8.387-8.398)** Other key assessments include the **Cultural Heritage Assessment Part B (EN09) p87 – p95** - which examines the issue of a local heritage assets Grade II Listed Buildings (Bennetts, Blacksmiths Cottage and The Queen's Head Public House) located adjacent to the site. Through such assessments and the evidence base, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

### c) BGR3?

11. The Old School site is allocated in the Local Plan under BGR3 for 20 dwellings. The site has been subject to site assessment under site reference SA522, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 146-147** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) - SD03a Table 7.3 (p126)**. Through such assessment, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

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<sup>2</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0017/141452/Itchingfield-Neighbourhood-Plan-Referendum-Version-November-2024.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0017/141452/Itchingfield-Neighbourhood-Plan-Referendum-Version-November-2024.pdf)

12. The site is proposed also within the Itchingfield Neighbourhood Plan and identified in **Policy 10** for around twenty homes. Policy 10 has eight criteria, some of which are more detailed than would be expected to be included within a Local Plan. Nevertheless, should the Itchingfield neighbourhood plan be made, the site-specific criteria would become part of the Development Plan, sitting alongside the Local Plan. The BGR3 criteria are considered to be consistent with the neighbourhood plan policy, with the latter, more detailed approach reflecting the purpose of neighbourhood plans to reflect local community preferences.

### Question 3: Is Strategic Policy HA7: Broadbridge Heath Housing Allocation sound?

13. As identified in **Paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a small town/larger village as identified in the settlement hierarchy in **Strategic Policy 2**. Further details are provided in response to the sub-questions below in relation to BRH1. Importantly, since the production of the Plan, the site has gained outline planning permission, 133 homes, following an appeal<sup>3</sup>.

#### a) BRH1?

14. The site has been subject to site assessment under site reference SA386, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 121-123** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.399-8.409 (SD03b) and Page 126 (SD03a)**. Through such assessment, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

#### b) Should development be steered to part of the site at the lowest risk of flooding and has flood risk and the gas pipeline informed the site capacity

15. As part of the site assessment work, the Council recognises that part of the site is in areas of flood risk (around 6% of the site lies within Flood Zone 2 and 2.8% of the site within Flood Zone 3). As such, criterion d of the policy was introduced, in part to direct development away from areas at greater risk of flooding. The **Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14)** proposes a modification (**HM095**) which improves the clarity of the policy by separating requirements in relation to flood risk and the gas pipeline. The appeal relating to the site considered the matter of flood risk and though the layout provided for the appeal was indicative, it suggests that water compatible public space would be located in areas at highest risk of flooding, with built development in areas of lowest flood risk.
16. Flood risk and the gas pipeline have been matters that have been taken into account when assessing a potential site capacity. Other matters such as landscape and nearby heritage assets have also influenced the assessment. Overall, the Council is of the view that around 150 homes could be accommodated on the site. However, as the site now has approval for 133 homes, it was seen as most appropriate to refer to that figure within the policy.

### Question 4: Is Strategic Policy HA8: Cowfold Housing Allocations sound?

17. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a medium village as identified in the settlement hierarchy in **Strategic Policy 2**. More details are provided in the sub-questions below in relation to CW1 and CW2. Both of the sites are subject to live planning applications.

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<sup>3</sup> <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=56387770>



18. To note, the **Cowfold Neighbourhood Plan**<sup>4</sup> is at an advanced stage of production, which at the time of writing has been subject to examination and a further supplementary consultation relating to the introduction of a water neutrality policy. HDC intends to bring it to a meeting of the full Council in Spring 2025 to formally 'make' the neighbourhood plan, following a referendum.

#### a) CW1?

19. The site has been subject to assessment under site reference SA609, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 128-130** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.419-8.432 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development. The site specific policy criterion will ensure that proposals will need to reflect the existing settlement pattern by focussing development on the southern part of the site and bringing forward a landscaping treatment on the northern part of the site.
20. A full planning application<sup>5</sup> has been submitted, broadly in keeping with the proposed allocation. The Council resolved to grant the application, pending signing of a S106 on 21<sup>st</sup> November 2023.

#### b) CW2?

21. The site consists of two jointly appraised parcels of land with site references SA610 and SA611, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 128-130** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.419-8.432 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances – which includes limiting built form to the northern part of the site and the introduction of suitable landscaping.
22. A full planning application<sup>6</sup> has been submitted, broadly in keeping with the proposed allocation. At the time of writing, it is awaiting determination.

#### c) Is criterion a) effective?

23. The criterion draws a potential applicant and the decision maker to policies within the Cowfold Neighbourhood Plan. In particular, this site is identified in **Policy 12** of the Cowfold Neighbourhood Plan as an allocation. The policy includes 13 criteria, some of which are more detailed than would be expected to be included within a Local Plan reflecting the purpose of neighbourhood plans to reflect local community preferences. Should the neighbourhood plan be made, these site-specific criteria would become part of the Development Plan, sitting alongside the Local Plan.
24. Given this context, it is considered that the criterion would be effective, as it provides clarity to ensure that all relevant policies are considered when determining proposals on the site.

#### **Question 5: Is Strategic Policy HA9: Henfield Allocation sound?**

25. As identified in **Paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
26. Henfield Parish has a made neighbourhood plan from June 2021 and allocates 270 dwellings up to 2031 contributing positively to the housing supply and meeting a local need. The Henfield

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<sup>4</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0019/141445/Cowfold-Neighbourhood-Plan-November-2024.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0019/141445/Cowfold-Neighbourhood-Plan-November-2024.pdf)

<sup>5</sup> Application reference DC/22/1815

<sup>6</sup> Application reference DC/24/0982



neighbourhood plan<sup>7</sup> (HNP) is aligned with the HDPF (**HDC05**) with the allocation of HNF1 in the emerging Local Plan meeting additional housing need taking account of the end-date for the neighbourhood Plan being 2031 compared with the Local Plan end-date of 2040.

#### a) HNF1?

27. The Council considers the allocation of approximately 55 homes at Land at Sandgate Nurseries, Henfield to be sound. Henfield is identified in the settlement hierarchy as a 'larger village' supported by the **Settlement Sustainability Review (EN07, p10)** which assesses Henfield position in the hierarchy and the capacity of the village to take sustainable development. The site is assessed under SA317 in the **Site Assessment Report Part C (H11) p131 -135** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.444 (SD03b) p196 - 198** (see also **Appendix F (SD03C) p316**). Other key assessments include the **Cultural Heritage Assessment Part B (EN09) p50-53** which addresses the issue of a local heritage asset located next to the site. **The Landscape Capacity Assessment (EN08)** is also a high-level assessment of landscape capacity around Henfield with reference to **Local Landscape Character Area 68: Land West of Henfield p90**. Through such assessments and the evidence base, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

#### **Question 6: Is Strategic Policy HA6: Horsham Housing Allocations sound?**

28. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
29. Horsham town has a neighbourhood plan called the **Horsham Blueprint<sup>8</sup>** which was made August 2020. The Horsham Blueprint does not allocate land for development. The plan is a strong advocate for green infrastructure. Policy HB10 support the Riverside Walk which is a network of green linkages across the town of Horsham. There are gaps in the Riverside Walk which the local plan also seeks to remedy by extending the Riverside Walk through the Local Plan Policy HOR1 (d).

#### b) HOR1?

30. The Council considers the allocation of 100 homes at Land at Hornbrook, Horsham to be sound. Horsham town is identified in the settlement hierarchy as the main settlement in the hierarchy which is the most sustainable settlement in the district and supported by the **Settlement Sustainability Review (EN07, p18)** which assesses Horsham town's position in the hierarchy and the capacity of the town to take sustainable development. The site is assessed under SA074 in the **Site Assessment Report Part C (H11) p136 -138** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.444 (SD03b) p198 - p200 and in Appendix F (SD03C) p316**. Through such assessments and the evidence base, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

#### c) HOR2?

31. The Council considers the allocation of 300 homes at Land at Mercer Road, Horsham to be sound. Horsham town is identified in the settlement hierarchy as the main settlement in the hierarchy which is the most sustainable settlement in the district and supported by the **Settlement Sustainability Review (EN07, p18)** which assesses Horsham town's position in the hierarchy and the capacity of the town to take sustainable development. The site is assessed under SA568 in the **Site Assessment Report Part C (H11) p156 -158** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.444 (SD03b) p198 - p200 and in Appendix F (SD03C) p316**. Through such assessments and the

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<sup>7</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0007/108466/Henfield-NDP-Referendum-Version-May-2021.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0007/108466/Henfield-NDP-Referendum-Version-May-2021.pdf)

<sup>8</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0019/118261/HBBNDP\\_Referendum\\_Version\\_MainPlan\\_red.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0019/118261/HBBNDP_Referendum_Version_MainPlan_red.pdf)

evidence base, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

#### d) Is criterion g) justified and consistent with national policy?

32. Yes. The **Warnham Neighbourhood Plan**<sup>9</sup> was made on the 26 June 2019 and allocates 50 dwellings up to 2031. Addressing car parking was one of the key issues/objectives to address in the Warnham Neighbourhood Plan. Within this, **Policy W8: Public Car Parking** advocates the provision of car park to serve users of Warnham Station and has indicated a Broad Location for the implementation of a car park: this is indicated in **Figure 7.3** of the made neighbourhood plan. HOR2 promotes the allocation of 300 dwellings at Mercer Road, next to the existing train station and there is an opportunity to promote sustainable travel and reduce dependency on vehicle travel. It is the Council's view that the approach in relation to this designation is consistent with national policy as expressed in the NPPF **Para 104 (c), Para 106 (c), Para 110 (a)(b), Para 113**.

#### **Question 7: Is Strategic Policy HA11: Lower Beeding Housing Allocations sound?**

33. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a smaller village as identified in the settlement hierarchy in **Strategic Policy 2**. Further details are provided in response to the sub-questions below in relation to site allocations proposed in Lower Beeding.
34. To note, the **Lower Beeding Neighbourhood Plan**<sup>10</sup> is at an advanced stage of production, which at the time of writing has been subject to examination and a further supplementary consultation relating to the introduction of a water neutrality policy. HDC intends to bring it to a meeting of the full Council in Spring 2025 to formally 'make' the neighbourhood plan, following a referendum. All of the proposed allocations discussed below are included within the neighbourhood plan.

#### a) LWB1?

35. The site has been subject to assessment under site reference SA567, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 149-150** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.469-8.476 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development. This has fed into the policy criteria, which is discussed in response to sub-question d).
36. It is recognised that part of this site is proposed within the Lower Beeding Neighbourhood Plan through the allocation identified in **Policy 9** for around 14 homes. The Council has assessed a larger site than identified in the neighbourhood plan and accordingly proposed the allocation of 30 homes.

#### b) LWB2?

37. The site has been subject to assessment under site reference SA584, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 151-152** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.469-8.476 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development – including in relation to the setting of historic assets. This has fed into the policy criteria, which is discussed in response to sub-question d).

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<sup>9</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0005/65291/Warnham-Neighbourhood-Development-Plan-2017-2031.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0005/65291/Warnham-Neighbourhood-Development-Plan-2017-2031.pdf)

<sup>10</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0003/141465/Lower-Beeding-Neighbourhood-Plan-Referendum-Version-Nov-2024.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0003/141465/Lower-Beeding-Neighbourhood-Plan-Referendum-Version-Nov-2024.pdf)

38. The site is proposed within the Lower Beeding Neighbourhood Plan through the allocation identified in **Policy 7** for around 7 homes. The Council has also assessed the site as being able to accommodate 7 homes.

[c\) LWB3?](#)

39. The site has been subject to assessment under site reference SA892, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 153-154** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **pages 124 and 125 (SD03a)**. Through such assessment, key site characteristics were identified which have fed into the policy development – including in relation to the setting of historic assets. This has fed into the policy criteria, which is discussed in response to sub-question d).
40. The site is proposed within the Lower Beeding Neighbourhood Plan through the allocation identified in **Policy 6** for around 6 homes. The Council has also assessed the site as being able to accommodate 6 homes.

[d\) Is criterion 2 a\) effective? Are criteria 2 b\) and c\) consistent with national policy?](#)

41. In relation to criterion a), the policy draws a potential applicant and the decision maker to policies within the Lower Beeding Neighbourhood Plan. The neighbourhood plan includes multiple policies (including site allocations), some of which are more detailed than would be expected to be included within a Local Plan reflecting the purpose of neighbourhood plans to reflect local community preferences. Notwithstanding a degree of conflict with LWB1 in terms of where development may be acceptable and the quantum of development, should the neighbourhood plan be made, its policies would become part of the Development Plan and sit alongside the Local Plan. Given this context, it is considered that the criterion would be effective and provide clarity by ensuring that all relevant policies are considered when determining proposals on the site.
42. In simple terms, the policy approach in criteria b) looks to do three things:
1. Protect and enhance the setting of the Grade II listed Holy Trinity church.
  2. Focus development for LWB1 to the southern part of the site.
  3. Ensure that proposals have regard to the High Weald AONB designation.
43. Modification **HM096** as presented at submission contained a drafting error insofar that it removed reference to points 1 and 2 of the original policy above. To rectify this, a further modification (**SM56 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) has therefore been proposed to rectify this. The further modification also:
- Separates the three issues into three distinct policy criteria for clarity.
  - Corrects the intent of the point 1 of the approach to read “*preserve and enhance*” rather than “*protect and enhance*”.
  - Identifies the Holy Trinity Church and its War Memorial as two separate assets.
  - Introduces reference to the High Weald National Landscape.
44. In relation to point 1 of the list above, the Council has suggested the modification **SM56** as described above. By using ‘preserve’, rather than ‘protect’ it is the Council’s view that this better achieves consistency with national policy with the **NPPF (paragraphs 190 and 206)** to take a positive approach to the conservation of the historic environment and is consistent with **Policy 21** of the Plan. This is discussed in more detail in another **Hearing Statement (Matter 9, Issue 1, Question 3)**. The recognition of the War Memorial as a separate heritage asset adds clarity to the policy and the reference to both it and the Holy Trinity Church is reflective of the findings of **pages 104-121** of the **Cultural Heritage Desk Based Assessment (EN09)**.
45. In relation to point 2 of the list above, it is the Council’s assessment that development of the northern parcel of LWB1 would not relate well to the built form of the village. Thus, the approach seeks

appropriate landscape mitigation in this part of the site that will aid a transition to the wider open countryside. This is consistent with many elements of **NPPF Paragraph 30**.

46. In relation to point 3 of the list above, the suggested modifications ensures that reference is made to the High Weald National Landscape designation, which is the new term for the AONB designation. It is the Council's view that the approach in relation to this designation is consistent with national policy as expressed in the **NPPF (paragraphs 176 and 177)**.
47. In relation to criterion c), site LWB3 lies within the Crabtree Conservation Area. The wording of the policy criterion seeks that any proposal should positively contribute to the Conservation Area and is reflective of the findings of **Cultural Heritage Desk Based Assessment (EN09) (Page 120)**. It is the Council's view that the wording of the criterion accords with national policy. This is as **NPPF Paragraph 206** explains that "*Local planning authorities should look for opportunities for new development within Conservation Areas... to enhance or better reveal their significance*", which is consistent with the proposed policy wording.

#### **Question 8: Is Strategic Policy HA12: Partridge Green Housing Allocations sound?**

48. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a medium village as identified in the settlement hierarchy in **Strategic Policy 2**. Further details relating to the sites are provided in response to the sub-questions below.
49. Please note that all of the sites in Partridge Green are subject to live planning applications. The latest known position for each site, at the time of writing, is presented in response to each question.

##### a) PG1?

50. The site has been subject to assessment under site reference SA320, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 165-166** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – e.g. **page 126 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development by virtue of seeking to limit development to the part of the site and retain mature tree boundaries through criterion a).
51. In relation to the above, a modification has been suggested (**HM097 in HDC Schedule of Suggested Modifications (SD14)**) to correct a drafting error and ensure that development is limited to the eastern portion of the site, rather than the western portion.
52. To note, an outline application has been submitted to the Council<sup>11</sup>, for 81 homes on the site. It is considered that the application is broadly consistent with the proposed allocation. Planning Committee (South) resolved to grant permission on 17<sup>th</sup> September 2024.

##### b) PG2?

53. The site has been subject to assessment under site reference SA274, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 160-161** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – e.g. **page 126 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development and justify the introduction of the three criteria listed in the policy.
54. To note, an outline application for 55 homes was refused by the Council on 28<sup>th</sup> February 2023<sup>12</sup>. An appeal was dismissed on 8<sup>th</sup> February 2024, principally in regard to how water neutrality was to be

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<sup>11</sup> Application reference DC/23/2279

<sup>12</sup> Application reference DC/22/0301

secured. The decision was subsequently quashed by the High Court and is being redetermined by PINS. The decision is awaited.

#### c) PG3?

55. The site has been subject to assessment under site reference SA433, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 160-161** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – e.g. **page 126 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development and justify the introduction of the criteria listed in the policy.
56. A live outline planning application is being considered by the Council<sup>13</sup> DC/24/0428 for 120 homes, which is broadly consistent with the proposed policy requirements.

#### **Question 9: Is Strategic Policy HA13: Pulborough Housing Allocation sound?**

57. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
58. **Pulborough Neighbourhood Plan**<sup>14</sup> is at an advanced stage of production, which at the time of writing has been subject to examination and a further focused consultation relating to the introduction of a water neutrality policy. The neighbourhood plan allocates 263 dwellings up to 2031 (170 of which have now received outline planning permission). HDC intends to bring the neighbourhood plan to a meeting of the Full Council in Spring 2025 to formally 'make' the neighbourhood plan, subject to a positive referendum.

#### a) PLB1?

Land at Highfield is an allocation in the Pulborough Neighbourhood Plan (**Policy 6 PPNP17**) for 25 units. Policy 6 has nine criteria which any proposal will be required to accord with. For the Local Plan review the site has been subject to assessment under site reference SA556, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 168-170** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **pages 56 to 57 (SD03a)**.

#### b) should criterion 3 refer to 2021?

59. Yes, Criterion 3 of Policy HA13 references the **Open Space, Sports and Recreation Review (I04)**. A drafting error refers to this Review as being dated 2020. Therefore, a modification is suggested (**SM57 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) is proposed to address this error and the correct date of '2021' will be inserted instead.

#### c) Is criterion 5 a) necessary?

60. Yes. The criterion draws a potential applicant and the decision maker to policies within the Pulborough Neighbourhood Plan. In particular, this site is identified in **Policy 6** of the Pulborough Neighbourhood Plan as an allocation for 25 dwellings. The policy includes 9 criteria. Should the neighbourhood plan be made, the site-specific criteria would become part of the Development Plan, sitting alongside the Local Plan.

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<sup>13</sup> Application reference DC/24/0428

<sup>14</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0005/141467/Pulborough-Neighbourhood-Plan-Referendum-November.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0005/141467/Pulborough-Neighbourhood-Plan-Referendum-November.pdf)



61. Given this context, it is considered that the criterion would be effective, as it provides clarity to ensure that all relevant policies are considered when determining proposals on the site.

#### Question 10: Is Strategic Policy HA14: Rudgwick and Bucks Green Housing Allocations sound?

62. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a medium village as identified in the settlement hierarchy in **Strategic Policy 2**. Further details relating to the sites are provided in response to the sub-questions below.

##### a) RD1?

63. The site has been subject to assessment under site reference SA574, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 172-174** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.489-8.496 (SD03b)** and **page 150 (SD03a)**. Through such assessment, key site characteristics were identified which have fed into the policy development by virtue of seeking to limit development to the southern part of the site and bring forward landscape mitigation in the north (criterion a) and to ensure the regard is had to heritage assets (criterion b).

##### b) RD2?

64. The site has been subject to assessment under site reference SA574, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 172-174** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.489-8.496 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development by virtue of seeking to limit development.

#### Question 11: Is Strategic Policy HA15: Rusper Housing Allocations sound?

65. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.

66. Rusper Neighbourhood Plan was made February 2016. The plan does not make any allocations.

##### a) RS1?

67. The Council considers the allocation of 12 homes at Land at Land at Rusper Glebe, Rusper to be sound. Rusper is identified in the settlement hierarchy as a 'small village' supported by the **Settlement Sustainability Review (EN07) p26** which assesses Rusper's position in the hierarchy and the capacity of the village to take sustainable development. The site is assessed under SA317 in the **Site Assessment Report Part C (H11) p131 -135** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.497 (SD03b) p209 - 211. Appendix F (SD03C) p327**. Other key assessments include the **Cultural Heritage Assessment Part B (EN09) p183 -190** as SA317 lies wholly within the Rusper Conservation Area and lies adjacent to a number of heritage assets including St Mary Magdalene Church (Grade I), Ghyll Cottage (Grade II) and The Plough Inn (Grade II). Through such assessments and the evidence base, key site characteristics including heritage were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

##### b) RS2?

68. The allocation Land north of East Street for 20 dwellings is considered to be sound. The site has been subject to assessment under site reference SA872, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on

pages 181-182 of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)**. **SD03a P71, SD03b paragraph 8.497 on p209 and Appendix F p328 (SD03b)**. Other key assessments include the **Cultural Heritage Assessment Part B (EN09) p191-197**. Through such assessments, key site characteristics were identified which have fed into the policy development including a requirement for any proposal to have due regard to the setting and character of the Rusper Conservation Area located to the west of RS2.

#### c) Should the policy refer to 32 homes?

69. Yes. The quantum of dwellings to be delivered through Policy HA15 is 32 homes through the allocation of two sites: RS1 and RS2. A drafting error states Policy HA15 currently states 22 dwellings to be delivered in Rusper village up to 2040. This is incorrect and unintended. Therefore, a modification (**HM101 in HDC Schedule of Suggested Modifications (SD14)**) is proposed for consideration to address this error and the correct figure of '32' will be inserted instead.

#### **Question 12: Is Strategic Policy HA16: Small Dole Housing Allocation sound?**

70. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
71. Small Dole village is split between Henfield Parish and Upper Beeding Parish. As such, the village lies within two separate neighbourhood plan areas of Upper Beeding Parish and Henfield Parish. Both plans allocated land for development, and both were formally 'Made' on 23 June 2021.

#### a) SMD1?

72. The allocation Land West of Shoreham Road is considered to be sound. Small Dole is identified as a small village in the settlement hierarchy underpinned by the **Settlement Sustainability Review (EN07, p27)**. The site has been subject to site assessment under site reference SA538, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 185-186** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.504-8.515 (SD03b) and Page 75 (SD03a)**. Through such assessment, Other key assessments include the **Landscape Capacity Study (EN07) p158** which is a broad assessment of landscape capacity around settlements to accept development without unacceptable adverse impacts on the wider landscape. The study indicates SMD1 is located in the Landscape Character Area SD1 and there is moderate capacity around Small Dole village to accommodate housing. The assessment concludes that this area has a moderate landscape character sensitivity, a moderate visual sensitivity, and a low - moderate landscape value, which in combination means that this area has a moderate capacity for medium scale housing. Landscape sensitivity and capacity are defined in the Landscape Capacity Assessment between p8 to p19. Through such assessments and the evidence base, key site characteristics were identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

#### **Question 13: Is Strategic Policy HA17: Steyning Housing Allocation sound?**

73. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
74. Steyning Parish Council developed the Steyning Neighbourhood Plan covering the period 2015-2031 which does not allocate sites for development. The Steyning Neighbourhood Plan was made in May 2018.



#### a) STE1?

The allocation at Land at Glebe Farm, Steyning is considered to be sound. Steyning is identified as a large village in the settlement hierarchy underpinned by the **Settlement Sustainability Review (EN07, p27)**. The site has been subject to site assessment under site reference SA742, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 188-190** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.516-8.524 (SD03b) and Appendix F Page 331 (SD03c)**. An application (DC/21/2233) went to planning committee for 265 dwellings and received a resolution to grant at Planning Committee South on the 26 September 2024, subject to signing of a S106 agreement.

#### b) Are odour or noise mitigation measures necessary?

75. No. It is considered **Strategic Policy 11: Environmental Protection** in the Local Plan already requires all development to maintain or reduce exposure to odour (criterion 6) and demonstrate acceptability in relation to noise pollution (criterion 5). With appropriate mitigation implemented, for example site layouts, acoustic fencing, adequate glazing and active ventilation systems, noise and odour levels can be mitigated through conditioning a planning permission to ensure appropriate levels to make the development acceptable in planning terms.

#### **Question 14: Is Strategic Policy HA18: Storrington & Sullington Housing Allocations sound?**

76. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
77. Storrington, Sullington Parish with Washington Parish has a made neighbourhood plan<sup>15</sup> from June 2021 and allocates 146 dwellings up to 2031 contributing positively to the housing supply. The Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) is aligned with the currently adopted **Horsham District Planning Framework (HDC05)**. The allocation of STO1 and STO2 in the emerging Local Plan further contributes to meeting the local housing need in the parish, taking account of the end-date for the neighbourhood Plan being 2031 compared with the Local Plan end-date of 2040.

#### a) STO1?

78. The allocation STO1 is considered to be sound. Storrington village is identified as a large village in the settlement hierarchy underpinned by the **Settlement Sustainability Review (EN07, p28/29)**. STO1 comprises of two separate parcels of land (SA361 and SA732) and adjoins the northern Built-up Area Boundary of Storrington & Sullington. Under Policy STO1, any proposal should comprise of a comprehensive development to optimise the use of land and ensure complementary layouts across the parcels.
79. The site has been subject to site assessment under site references SA361 and SA732, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 192-195** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.525-8.535 (SD03b) and Page 134 (SD03a)**. Other key assessments include the **Landscape Capacity Study (EN07) p77-78** and is a broad assessment of landscape capacity around settlements to accept development. The study indicates there is capacity around Storrington to accommodate development without unacceptable adverse impacts. The landscape capacity study indicates STO1 traverses two Landscape Character Areas: 59 and 57.

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<sup>15</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0019/71353/SSW-NP-adopted-September-2019.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0019/71353/SSW-NP-adopted-September-2019.pdf)

80. Landscape Character Area 57 lies on the on the northern edge of Storrington and to the west and east of Fryern Road, is described as having a very gently sloping landform with a small-medium scale regular field pattern. The assessment concludes that this area has a moderate-high landscape character sensitivity, a moderate visual sensitivity, and a moderate value, which in combination means that this area has a low/moderate capacity for medium scale housing. Landscape sensitivity and capacity are defined in the Landscape Capacity Assessment between p8 to p19.
81. Landscape Character Area 58 is located to the east of Fryern Road. This area is described as being characterised by a small stream valley with gently sloping topography, and small pasture fields with some arable land. The assessment concludes that this area has a high landscape character sensitivity, a low-moderate visual sensitivity, and a moderate value, which in combination means that this area has a no-low capacity for medium scale housing. Landscape sensitivity and capacity are defined in the Landscape Capacity Assessment between p8 to p19. **Cultural Heritage Assessment Part B (EN09) p215-232** is another important assessment given the local heritage assets located to the north of the STO1. Table 73 in the Cultural Heritage Assessment Part B assesses the following heritage assets to the north of STO1 may be more sensitive to potential changes to their significance:
- West Wantley Farmhouse (NHLE 1027238)
  - East Wantley (NHLE 1285180)
  - East Wantley Barn (NHLE 1471834)
82. The Cultural Heritage Assessment advises the following issues should be considered as part of any detailed site assessment to mitigate any harm to the significance of the identified assets; Care should be taken to ensure that the isolated, agricultural setting of West Wantley Farm and East Wantley and East Wantley Barn is retained to ensure an understanding of the historic and functional role of the farmhouses within their surroundings; the rural aspect of the buildings contributes to their setting; new buildings should be traditionally scaled and detailed; consideration should be given to the cumulative impact of development on the overall landscape and historic character of the locality; and the quantum of development should reflect the transition between the site area and the surrounding countryside to the north. Through such assessments and the evidence base, key issues such as heritage and landscape are identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.
83. A modification has been forward for consideration (**HM104 in HDC Schedule of Suggested Modifications (SD14)**) to Policy HA18 STO1 which puts forward an amendment to criterion (c) to read:

Amend policy criterion (c) as follows:

*c) Have appropriate regard to the setting of West Wantley Farmhouse (Grade II\*), and East Wantley Farm (Grade II), and East Wantley Barn (Grade II). An appropriate buffer should be provided on the northern section of the site to retain the setting of these properties.*

#### b) STO2?

84. The allocation Land at Rock Road is considered to be sound. Storrington Village is identified as a large village in the settlement hierarchy underpinned by the **Settlement Sustainability Review (EN07, p28/29)**. The site has been subject to site assessment under site reference SA384, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 196-198** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d) – Paragraphs 8.525-8.535 (SD03b) and Appendix F, p333 (SD03c)**. Through such assessment, key site characteristics were identified which have been fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances. Other key assessments including the **Landscape Capacity Study (EN07) p158** and is a broad assessment of landscape capacity around settlements to accept development. The study indicates there is capacity around Storrington to

accommodate development. The study indicates there is capacity around Storrington to accommodate development without unacceptable adverse impacts. The landscape capacity study indicates STO2 lies within Landscape Character Areas: 60. The assessment concludes that this area has a moderate - high landscape character sensitivity, a low- moderate visual sensitivity, and a moderate – high combined landscape sensitivity value, which in combination means that this area has a low/moderate capacity for medium scale housing. Landscape sensitivity and capacity are defined in the Landscape Capacity Assessment between p8 to p19.

### Question 15: Is Strategic Policy HA19: Thakeham (The Street and High Bar Lane) Housing Allocations sound?

85. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a medium village as identified in the settlement hierarchy in **Strategic Policy 2**. Further details relating to the sites are provided in response to the sub-questions below.
86. To note, both sites are subject to live planning applications and this is described below.

#### a) TH1?

87. The site has been subject to assessment under site reference SA039, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 200-202** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.536-8.542 (SD03b)** and **page 128 (SD03a)**. Through such assessment, key site characteristics were identified which have fed into the policy development and, as such, criterion a) was proposed to preserve and enhance existing natural features.
88. A full planning application<sup>16</sup> has been submitted for 25 homes and received a resolution to grant at Planning Committee South on the 19<sup>th</sup> November 2024, subject to signing of a S106 agreement.

#### b) TH2?

89. The site has been subject to assessment under site reference SA873, using the same methodology as described elsewhere in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 203-205** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.536-8.542 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development in relation to criteria relating to rights of way (criterion a) and noise impacts from the adjacent industrial site (criterion b).
90. A full planning application<sup>17</sup> has been submitted for 28 homes. The application, at the time of writing, is yet to be determined.

### Question 16: Is Strategic Policy HA20: Warnham Housing Allocation sound?

91. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. The level of development proposed is considered appropriate for a medium village as identified in the settlement hierarchy in **Strategic Policy 2**. Further details relating to the proposed site allocation is provided in response to the sub-questions below.

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<sup>16</sup> Application reference DC/20/2577

<sup>17</sup> Application reference DC/23/2152

#### a) WRN1?

92. The site has been subject to assessment under site reference SA071, using the same methodology as described elsewhere in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 207-209** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **Paragraphs 8.543-8.550 (SD03b)**. Through such assessment, key site characteristics were identified which have fed into the policy development in relation to criteria that requires development to ensure that it sympathetic to the prevailing linear character of Bell Road (criterion c) and has regard to measures that relate to road safety (criterion d). Such criteria will assist in ensuring that development proposals are sustainable.
93. Please note that an additional modification has been suggested to correct a numbering error in the policy criteria (**SM58** in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**). This does not change the operation of the policy.

#### **Question 17: Is Strategic Policy HA21: West Chiltington and West Chiltington Common Housing Allocations sound?**

94. As identified in **paragraph 1** of this Hearing Statement, the Council considers that all of its site allocations are sound. Further details relating to the sites are provided in response to the sub-questions below.
95. West Chiltington Parish Council are working on a neighbourhood plan. At the time of writing the West Chiltington Neighbourhood Plan<sup>18</sup> is at Regulation 16 consultation concluding on the 6 December 2024. Examination will be undertaken in early 2025 with adoption of the plan expected in the second half of 2025 following a successful referendum result. The West Chiltington Neighbourhood Plan allocates 29 dwellings up to 2031.

#### a) WCH1?

96. Land at Hatches Estate is an allocation in the West Chiltington Neighbourhood Plan (**Policy H2a**) for 15 units. Policy H2a has ten criteria which any proposal will be required to accord with. Notwithstanding, Policy H2a has some criterion of which are more detailed than would be expected to be included within a Local Plan but considered entirely appropriate and proportionate for a neighbourhood plan given the purpose of neighbourhood plans is to reflect local community preferences. It is considered there no degree of conflict with WCH1 in terms of where development may be acceptable and the quantum of development. Should the neighbourhood plan be made, its policies would become part of the Development Plan and sit alongside the Local Plan. Given this context, it is considered that the policies would be effective and provide clarity by ensuring that all relevant policies are considered when determining proposals on the site.
97. The Council's assessment of the site (reference SA066) uses the same methodology as described elsewhere in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 211-213** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **pages 56 to 57 (SD03a)** and **Paragraphs 8.551-8.560 (SD03b)**.

#### b) WCH2?

98. Land at Smock Alley is an allocation in the West Chiltington Neighbourhood Plan (**Policy H2a**) for 14 units. Within the neighbourhood plan, Policy H2a has eight criteria which any proposal will be required to accord with. Notwithstanding, Policy H2a has some criterion of which are more detailed than would be expected to be included within a Local Plan but considered entirely appropriate and proportionate for a neighbourhood plan. It is considered there no degree of conflict with WCH2 in terms of where development may be acceptable and the quantum of development, should the neighbourhood plan be

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<sup>18</sup> <https://strategicplanning.horsham.gov.uk/WestChiltingtonReg16/consultationHome>

made, its policies would become part of the Development Plan and sit alongside the Local Plan given the purpose of neighbourhood plans is to reflect local community preferences. Given this context, it is considered that the criterion would be effective and provide clarity by ensuring that all relevant policies are considered when determining proposals on the site.

99. For the Local Plan review the site has been subject to assessment under site reference SA429, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 214-216** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **pages 56 to 57 (SD03a)** and **Paragraphs 8.551-8.560 (SD03b)**.
100. A full planning application<sup>19</sup> has been submitted for 14 dwellings and is likely to go to Planning Committee South on 17<sup>th</sup> December 2024 for determination.

#### [c\) WCH3?](#)

101. Land East of Hatches Estate is an allocation in the local plan. The site has been subject to assessment under site reference SA500, using the same methodology as described in another **Hearing Statement (Matter 8, Issue 2, Question 1)**. The assessment of the site is set out on **pages 217-219** of the **Site Assessment Report Part C (H11)** and the **Sustainability Appraisal (SD03a-SD03d)** – particularly **pages 56 to 57 (SD03a)** and **Paragraphs 8.551-8.560 (SD03b)**.
102. The **Cultural Heritage Assessment Part B (EN09) p258-266** is another important assessment given the local heritage assets located to the south of the WCH3. Through such assessments and the evidence base, key issues such as heritage and landscape are identified which have fed into the policy criteria which will ensure that development which comes forward will be effectively delivered and responsive to local circumstances.

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<sup>19</sup> Application Reference DC/24/1619