



Horsham  
District  
Council

# Shaping Development in Horsham District

Planning Advice Note



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# 1. Introduction

## Horsham District Planning Framework and Local Plan Review

- 1.1 Horsham District Council (HDC) adopted its Local Plan, known as the Horsham District Planning Framework (HDPF)<sup>1</sup>, on 27 November 2015. The HDPF contains a set of policies and strategic allocations, which are used in the determination of planning applications in Horsham District<sup>2</sup>.
- 1.2 All local planning authorities are required to review and, if necessary, update their Local Plan five years from its adoption<sup>3</sup>. Furthermore, the Inspector who examined the HDPF stated that the Council must commence an early review within 3 years of adoption. As a consequence, HDC commenced its review of the HDPF in 2018, consulting on a Local Plan Review: Issues and Options document that concentrated on matters related to employment, tourism and sustainable rural development. The Council subsequently consulted on a draft version of its Local Plan between 17 February and 30 March 2020<sup>4</sup>.
- 1.3 Though progress of the Local Plan was impacted by changes to national policy and work relating to water neutrality following the receipt of Natural England's Position Statement (see section 4 of this document), the Local Plan was submitted for examination in July 2024, following a Regulation 19 publication period held between 19 January and 1 March 2024.
- 1.4 Local Plan examination hearings started in December 2024. The remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024. On 22 April 2025 the Council published the Inspector's subsequent Interim Findings Letter<sup>5</sup> which recommended that the Plan be withdrawn, due to his view that the Council failed to satisfactorily comply with the Duty to Co-operate when preparing the Local Plan.
- 1.5 The Council disagreed with the findings and on 18 August 2025 wrote to the Inspector requesting that he reopen the examination in relation to additional evidence which has come to light in relation to the Duty to Cooperate. As such, the submitted Local Plan remains the Council's emerging plan and the implications of this are discussed, where relevant, in this document.

## Housing Land Supply

- 1.6 The HDPF continues to form part of the Council's development plan. The HDPF sets an annualised housing target of 800 homes to be provided in Horsham District until

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<sup>1</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf)

<sup>2</sup> Excluding the part of Horsham District located in the South Downs National Park

<sup>3</sup> Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

<sup>4</sup> Under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

<sup>5</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0009/146565/ID08-Inspectors-Interim-Findings-Letter-040425.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0009/146565/ID08-Inspectors-Interim-Findings-Letter-040425.pdf)

2031, to which the housing land supply and housing delivery tests can be measured against. However, given that over five years has elapsed since the HDPF was adopted, the HDPF's housing target can no longer be used for calculating HDC's housing land supply. Paragraph 78 of the National Planning Policy Framework (NPPF) and related advice in the Planning Practice Guidance<sup>6</sup>, stipulates that the figure calculated using the Government's standard method for assessing housing need should instead be utilised (along with the any shortfalls in delivery), with an additional buffer of 20% due to the Council's performance against the housing delivery test.

- 1.7 Section 3 of the Council's Authority Monitoring Report (AMR) 2023/24<sup>7</sup> indicates that HDC can only demonstrate around a one-year housing land supply, less than the five-year supply required by Government. Similarly, it identifies that the Council's performance against the Housing Delivery Test (HDT) is 62% and accordingly, the Council has produced a Housing Delivery Action Plan<sup>8</sup>. The consequences of being unable to demonstrate a five-year housing land supply and HDC's HDT performance are set out in section 2 of this report.
- 1.8 Because of the circumstances in which the Council finds itself, and notwithstanding the current requirement for all new development to demonstrate that it is water neutral, HDC expects to receive planning applications proposing development in locations and of types not supported by the HDPF, the emerging Local Plan or in Neighbourhood Plans.
- 1.9 HDC will continue to act in a proactive manner by supporting sustainable development that both delivers the development to meet identified needs and ensures that other objectives are met. To demonstrate this, HDC has produced this document to provide clarity as to its approach and guidance to those who engage with the planning system in Horsham District.
- 1.10 The remaining sections of this document are structured as follows:
  - Section 2 provides guidance as to how much weight may be given to the existing HDPF and the emerging Local Plan
  - Section 3 covers Neighbourhood Plans produced by Parish and Neighbourhood Councils in Horsham District
  - Section 4 discusses the impact of the Natural England Position Statement regarding water neutrality on planning applications
  - Section 5 provides advice as to how the Council will continue to facilitate appropriate development
- 1.11 This Shaping Development in Horsham District Planning Advice Note updates and supersedes the October 2022 Facilitating Appropriate Development (FAD) document. HDC may seek to withdraw or alter the advice contained within this document to reflect updated legislation, national policy or guidance, or the status of the emerging Horsham District Local Plan 2023-40.

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<sup>6</sup> <https://www.gov.uk/guidance/housing-supply-and-delivery>

<sup>7</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0009/146817/3AMR-2023-2024-Chapter-3-Housing.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0009/146817/3AMR-2023-2024-Chapter-3-Housing.pdf)

<sup>8</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0008/146816/HDC-HDT-Action-Plan-2025.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0008/146816/HDC-HDT-Action-Plan-2025.pdf)

## 2. Weight of the HDPF and other documents

### Horsham District Planning Framework (HDPF)

- 2.1 The HDPF sets out the Council's planning policies to be used in the determination of planning applications. Alongside any Neighbourhood Plans produced by communities, it forms the central component of the development plan for Horsham District.
- 2.2 As explained in Paragraph 2 of the NPPF and in legislation<sup>9</sup>, applications for planning permission must be made in accordance with the development plan, unless material considerations indicate otherwise. Such material considerations include national policy and guidance contained in the NPPF and PPG.
- 2.3 As discussed in the introductory section of this document, the Council is unable to demonstrate a five-year housing land supply and has a Housing Delivery Test performance of 62%. NPPF Paragraph 11, an excerpt of which is shown below, sets out the impact on existing development plan policies in such circumstances:

*"Plans and decisions should apply a presumption in favour of sustainable development..."*

*For decision-taking this means: ...*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application out-of-date<sup>8</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed<sup>7</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination<sup>9</sup>"*

*[Footnotes taken from NPPF page 6]*

*"7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.*

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<sup>9</sup> 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) of the Town and Country Planning Act 1990

*8 This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 232.*

*9 The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.”*

- 2.4 The above is a key material consideration in applications for housing applications in Horsham District. This is as, in the absence of a five-year housing land supply and/or where Housing Delivery Test performance is less than 75%, Paragraph 11 (and footnote 8) indicates that policies that affect that supply of housing may be considered out-of-date. This has the effect of reducing the weight that may be afforded to such policies and engages the ‘tilted balance’ where there is an expectation that planning applications for housing should be approved. As explained throughout section 5 of this document, the HDPF policies nevertheless may still carry some weight in decision making.
- 2.5 As identified in the excerpt, there are exceptions that would disengage the ‘tilted balance’ and the Council will need to consider NPPF Paragraph 11d)i (and related footnote 7) on a case-by-case basis to see whether such exceptions exists. Importantly, the Council is of the view that the ‘tilted balance’ would be disengaged if development cannot demonstrate water neutrality in order to protect a designated habitats site – the Arun Valley SAC (see section 4 of this report for more details).
- 2.6 In addition, just because the ‘tilted balance’ may be in effect, it does not mean that planning applications will automatically be approved. NPPF Paragraph 11d)ii states that a balancing exercise still needs to take place when determining any application. This exercise will depend on the circumstances of an individual planning application and the judgment of the decision maker as to whether any adverse impacts of granting permission “*would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination*”.

## **The Horsham District Local Plan 2023-2040**

- 2.7 As explained in the introductory section, the Council submitted its Local Plan (hereafter referred to as the ‘emerging Local Plan’ or ‘eLP’) in July 2024. As set out in section one, the Council has responded to the Inspector’s initial findings letter requesting that examination hearings be re-opened.
- 2.8 Paragraph 49 of the NPPF explains that “*local planning authorities may give weight to relevant policies in emerging plans according to:*
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*

- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework [NPPF] (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”*

2.9 The NPPF is a key material consideration in the determination of planning applications and paragraph 49 is relevant to the amount of weight that can be given to eLP policies. Each criterion is discussed in turn.

*a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given*

2.10 The emerging Local Plan has been submitted for examination and a number of steps have taken place. This includes providing responses to the Inspector’s Matters, Issues and Questions (MIQs) and undertaking three days of examination hearings. Following the first three days of hearings, the Inspector cancelled further hearings scheduled for December 2024 and January 2025, and on 7 April 2025 the Council received the Inspector’s Initial Findings Letter (IFL) that recommended the Council withdraw the Local Plan from examination due to his view that the Duty to Cooperate had not been met.

2.11 On 18 August 2025, the Council wrote to the Inspector requesting that he revisit his conclusions relating to the Duty to Cooperate by allowing a hearing to take place, including with representatives of neighbouring authorities and consideration of all relevant evidence, particularly given the context of proposed changes to the planning system (including the revocation of the Duty to Cooperate) and local government reorganisation. The Council will not take any actions to consider whether to follow the IFL’s recommendation until a response to its letter of 18 August 2025 is received. As such, the examination of the Local Plan remains ‘live’ and in the context of NPPF paragraph 49, the submitted Local Plan remains the Council’s emerging plan.

2.12 It is recognised that at the time of writing, the outcome of the Council’s letter is not known. In the event that the Inspector reconsider his initial findings, there would still be a number of steps that would have to be undertaken prior to the conclusion of the Local Plan Examination. This will/could include:

- Examination hearings on different matters
- Undertaking further work on matters identified by the inspector or responding to questions relating to changes or update to national policy.
- Producing and consulting on main modifications to the Plan to respond to issues that arise legislative and/or national policy changes
- Potentially further MIQs and hearings relating to the main modifications

2.13 These matters would take a further period of time to programme and complete. At the time of writing therefore, the Council does not take the view that the eLP is sufficiently advanced to justify great weight to its policies. The weight to policies would however be expected to increase should the examination progress.



b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given)

2.14 The Regulation 19 Local Plan was made available for representations for a six week period ending on 1 March 2024. 1,636 representations were submitted from over 1,000 groups and individuals. A report was produced that summarises the representations received<sup>10</sup> and identifies reasons for objection (and support). Additionally, examination participants have written responses to the Inspector's MIQs. These are contained on the Council's Local Plan Examination webpage<sup>11</sup> and often add more detail to their objections to particular policies.

2.15 Almost all policies had objections. Whilst some were relatively minor in nature, more significant levels of objection were in relation to a number of elements of the plan. This includes a high volume of objection to the proposed strategic allocations. Similarly, all of the smaller (non-strategic) allocations received objections - albeit there was a wide range of variance in the level of objections.

2.16 With non-site specific policies, there was variance in the amount of opposition, with the greatest levels of opposition seen to the following:

- Strategic Policy 9: Water Neutrality – particularly from the development industry on the need for the policy, the legal basis for our requirements and the imposition of higher building standards than required by legislation
- Strategic Policy 17: Green Infrastructure and Biodiversity – particularly from the development industry in relation to the higher requirements (12%) of BNG than required by legislation
- Strategic Policy 37: Housing Provision – the development industry tended to view that the housing targets were too low, with the opposite view generally coming from local residents/groups.
- Strategic Policy 39: Affordable Housing – generally the view of the development industry was that the proportion required was too high with local residents/groups suggesting the opposite and/or that housing was too expensive generally.

2.17 Modifications to the emerging Local Plan have been proposed, in part, to overcome some of the issues raised. However, it cannot be known at the time of writing as to whether this would be accepted by the Inspector particularly in light of his comments in his initial findings letter which indicate that he had some soundness concerns with the plan. Such matters would continue to need to be scrutinised through the examination process, should it continue.

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<sup>10</sup> [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0004/138307/SD11d-Regulation-19-Summary-of-Representations-Appendix-1.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0004/138307/SD11d-Regulation-19-Summary-of-Representations-Appendix-1.pdf)

<sup>11</sup> <https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Examination-Library>

2.18 Given the context, it is not considered that great weight could be given to the policies at this time, on account of there existing unresolved objections to the majority of the policies in the emerging Local Plan.

c) the degree of consistency of the relevant policies in the emerging plan to this Framework [NPPF] (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

2.19 In response to the Inspector's Action Points 1 and 17, the Council produced an analysis of the consistency of the emerging Local Plan policies with the NPPF<sup>12</sup>. Within it, it was concluded that all but one policies was fully consistent with the NPPF. The exception to this was Strategic Policy 37: Housing Provision, where it was noted that the emerging Local Plan was not addressing, fully, housing needs.

2.20 Notwithstanding this, a number of representations where objections to the plan were raised were on the grounds of non-alignment with national policy/NPPF. Given that consistency with national policy is one of the soundness tests to which Inspectors assess Local Plans, it will only be through the examination process that this will be tested and any conclusions can be drawn. Until such time, it is not considered that the work referenced above is on its own sufficient to justify more great weight being afforded to the policies of the emerging Local Plan.

#### Conclusion on weight to be given to emerging Local Plan

2.21 Taking the above together, the general advice is therefore that although the policies of the emerging Local Plan are likely to be material considerations in relation to specific planning applications, **the weight to be applied to such policies is, at the time of writing, likely to be limited in most cases**. The weight may increase should the examination progress to further stages.

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<sup>12</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0006/143574/Response-to-Action-Point-1-and-17-Appendix-1-Matter-1-Issue-1,-Matter-1-Issue-2,-Matter-2-Issue-1,-Matter-2-Issue-2,-and-Matter-2-Issue-3.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0006/143574/Response-to-Action-Point-1-and-17-Appendix-1-Matter-1-Issue-1,-Matter-1-Issue-2,-Matter-2-Issue-1,-Matter-2-Issue-2,-and-Matter-2-Issue-3.pdf)

### 3. Neighbourhood Plans

- 3.1 Neighbourhood Plans allow local communities to help shape the future of their areas. When ‘made’ by local authorities the Neighbourhood Plans prepared by Parish Councils and other qualifying bodies become part of the statutory development plan and together with the Local Plan are the starting point for determining planning applications.
- 3.2 HDC has an excellent record in relation to Neighbourhood Plans and at the time of writing this document, 19 Neighbourhood Plans have been made, with other Neighbourhood Plans being at an advanced stage of preparation<sup>13</sup>. The Council intends to produce a Neighbourhood Plan Guidance Note, which though primarily will be designed to assist Parish Councils and Neighbourhood Forums in preparing Neighbourhood Plans, may be of assistance to applicants and those determining planning applications.
- 3.3 Neighbourhood Plans form a part of the development plan, however they are not immune from the ‘tilted balance’ as described in NPPF Paragraph 11d) (see section 2 of this document) and as such, their policies may be considered out-of-date due to HDC being unable to demonstrate a five-year housing land supply. As described in paragraph 2.4 and elsewhere in this document, such policies may still carry some weight in decision making.
- 3.4 Notwithstanding the paragraph above, Neighbourhood Plans benefit from extra support in national policy where particular circumstances are met, even if a local authority is not able to demonstrate a five-year housing land supply. In the scenario outlined below planning permission is unlikely to be granted where a proposal conflicts with policies in a Neighbourhood Plan. This is outlined in NPPF Paragraph 14, which states that:
- “In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*
- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)”*
- 3.5 It will therefore be necessary at the time of determination of a relevant planning application, for the Council to consider whether the conditions exist that allow NPPF Paragraph 14 to be engaged. A list of Neighbourhood plans, their current status (at the time of writing) and date of adoption, and whether the plans contain allocations is set out in Appendix 1. This will help inform any consideration as to whether paragraph 14 is engaged.

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<sup>13</sup> <https://www.horsham.gov.uk/planning/neighbourhood-planning>

- 3.6 Where paragraph 14 is not engaged, the ‘tilted balance’ would be engaged, reducing the weight to be applied to respective neighbourhood plan policies that relate to the supply of housing. In these instances, the expectation will be that planning applications for housing are approved, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

### Emerging Neighbourhood Plans

- 3.7 As with emerging Local Plans, Paragraph 49 of the NPPF (see paragraph 2.8) allows for weight to be given to emerging Neighbourhood Plans. The Council will therefore have regard to any Neighbourhood Plans in preparation when determining applications in relevant areas and assess whether weight should be given to policies in emerging Neighbourhood Plan based on the criteria contained within NPPF Paragraph 49.

### Prematurity

- 3.8 Paragraphs 50-51 of the NPPF explains the circumstances in which it may be possible to refuse an application on grounds of prematurity - i.e. when an application is determined before the adoption of a Local Plan or the making of a Neighbourhood Plan.

Paragraph 50:

*“However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*

*a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*

*b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.”*

Paragraph 51

*“Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.”*

- 3.9 The above excerpts therefore explain that there will be very few applications in which the Council will consider refusing on grounds of prematurity and that it will depend on the size and type of a proposal, as well as the stage in which an emerging Neighbourhood Plan has reached.

## 4. Water Neutrality

- 4.1 Horsham District is supplied with water by Southern Water from its Sussex North Water Resource Zone (SNWRZ). The supply is sourced from abstraction points in the Arun Valley, which include sites afforded environmental protection. On 14 September 2021, the Council received a Position Statement from Natural England stating that it cannot be ruled out that the abstraction of water for drinking supplies is having a negative impact on the environmental sites in the Arun Valley. They have therefore advised that any new development must not add to this impact and therefore must not increase the amount of water that is abstracted. Such development is described as ‘water neutral’.
- 4.2 HDC recognise that the need for development to be water neutral is unique to Horsham District and parts of other authorities within the SNWRZ and has published comprehensive information about the subject on the Council’s website<sup>14</sup>. Such information includes Natural England’s Position Statement, legislative background and FAQs, as well as general advice to applicants. As detailed information will continue to evolve advice is contained online and will be regularly updated to reflect the latest position. Such details are not covered in this document and prospective applicants and other interested parties are advised to check the Council’s website for the most-up-to-date information.
- 4.3 Notwithstanding the above and regardless of any other guidance contained within this document, it is the current position that all applications that increase the demand for mains (drinking) water will need to demonstrate that their proposal is water neutral. If an application cannot demonstrate water neutrality, it will not be determined positively.
- 4.4 The Council is working with partner local authorities, Natural England, Environment Agency and Southern Water to introduce the Sussex North Water Certification Scheme (SNWCS)<sup>15</sup> which can be used by eligible proposals in order to demonstrate water neutrality. Eligibility requirements for accessing SNWCS, as well as information as to how the scheme partners will prioritise applications and further information for applicants is available on the dedicated SNWCS website<sup>16</sup>.

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<sup>14</sup> <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district>

<sup>15</sup> Previously known as the Sussex North Offsetting Water Scheme (SNOWS)

<sup>16</sup> <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/sussex-north-offsetting-water-scheme-snows>

## 5. Shaping Development in Horsham District

- 5.1 As detailed earlier in this document, HDC acknowledges that it is unable to demonstrate a five-year housing land supply and that in accordance with the NPPF, the presumption in favour of sustainable development is engaged where Water Neutrality can be demonstrated. In part of its commitment to act in a positive way to ensure that local housing needs are met, it has set out below advice to guide applicants in submitting applications that would deliver sustainable and appropriate development. In providing the advice below and elsewhere in this document, the Council is not altering the statutory decision-making framework.
- 5.2 NPPF Paragraph 232 explains that existing development plan policies should not be considered out-of-date because they were adopted or made prior to the latest NPPF's publication and that due weight should be given to such policies, according to their consistency with the NPPF. Therefore, and notwithstanding that policies relating to housing delivery targets, sites and location of development may be considered out of date and therefore attract reduced weight, other policies within the HDPF and the district's Neighbourhood Plans are broadly up-to-date and compliant with the NPPF. As such it is expected that the policy requirements on most matters, including affordable housing provision, planning obligations, infrastructure and other on-site requirements must still be complied with in order for development to be considered favourably by the Council.

### Pre-application Advice Service

- 5.3 Seeking pre-application advice is considered a best practice approach for development proposals. The Council provides pre-application advice, on a without prejudice basis to any outcome of a full planning application process, and strongly encourages prospective applicants for all types of development to use this service. The service can be used to identify key issues regarding a proposal, highlight what information may be required to support an application and, ultimately, indicate whether a proposal is likely to gain planning permission or not. For larger and more complex proposals, a Planning Performance Agreement (PPA) may be appropriate. Full details are online<sup>17</sup>.
- 5.4 In addition to seeking pre-application advice, the Council encourages applicants to engage with Parish Councils, Neighbourhood Councils and local communities, ahead of the submission of planning applications.

### Site Allocations

- 5.5 Subject to water neutrality being demonstrated, the Council strongly encourages applications on site allocations contained within the HDPF and in Neighbourhood Plans. Applications on such sites have in-principle support, subject to schemes being consistent with other relevant policies and any site specific requirements contained within the relevant allocation policies – such as those that seek to protect important

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<sup>17</sup> <https://www.horsham.gov.uk/planning/planning-applications/planning-permission-advice-services/pre-application-planning-advice>

existing assets in or around a site or those that indicate the acceptable quantum of development for the site.

### **Sites identified within the emerging Horsham District Local Plan 2023-2040**

- 5.6 The eLP proposes a number of allocations to meet additional identified housing needs in the period to 2031, together with housing requirements to 2040 and therefore seeks to go beyond allocations in a number of made and emerging Neighbourhood Plans, as well as existing allocations contained in the HDPF.
- 5.7 It is the Council's view that the proposed site allocations are based on robust evidence, most notably site assessment work<sup>18</sup> and were capable of accommodating sustainable development. For this reason, the Council will consider positively proposals on sites identified in the eLP, which accord with such evidence and are in accordance with (non-housing supply) HDPF or Neighbourhood Plan policies. Therefore, the Council would encourage applicants to have regard to site-specific matters identified in relevant eLP, including the quantum of development.
- 5.8 Such advice is issued in recognition that the eLP Inspector has not indicated any specific concerns with proposed site allocations in his Initial Findings Letter, though concerns have been expressed about whether the overall quantity of homes being planned for was sufficiently high to meet the District's identified housing need, as well as unmet needs arising elsewhere.
- 5.9 The sites identified for allocation are identified in Appendix 2. Detailed site-specific matters are identified within the draft policies of the eLP<sup>19</sup>.

### **Locational Suitability and Scale**

- 5.10 Policies 3 and 4 of the HDPF set out the Council's development hierarchy and approach to settlement expansion. The policies collectively seek to ensure that development is located in the most sustainable locations, whilst retaining the character and function of the District. Policy 3 categorises the primary settlements of the district into different settlement types based on the characteristics and function of each town and village. Settlements categorised within the development hierarchy (other than unclassified settlements) have a defined settlement boundary, also referred to as a Built-up Area Boundary (BUAB), as depicted on the Policies Map. Policy 4 relates to settlement expansion where there is a defined BUAB.
- 5.11 These policies are still relevant and relate well to the current settlement form of the district. This is supported by paragraph 20 of the NPPF, which seeks to ensure that strategic policies identify an overall strategy for the pattern and scale of development,

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[https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf) & [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0003/131736/HDC-Reg-19-Site-Assessment-Report-Part-III-Preferred-Smaller-Sites-Dec-2023.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0003/131736/HDC-Reg-19-Site-Assessment-Report-Part-III-Preferred-Smaller-Sites-Dec-2023.pdf)

<sup>19</sup> <https://strategicplanning.horsham.gov.uk/gf2.ti/-/1583938/192184357.1/PDF/-/Horsham%20District%20Local%20Plan%20Regulation%2019.pdf>



as well as NPPF paragraphs 83 and 84 that seek to promote sustainable development in rural areas and prevent isolate homes in the countryside, respectively. As such, and as set out in Policy 3 of the HDPF, the Council will generally support applications within BUABs where the nature and scale of development proposed does not affect the settlement's characteristics and function. It is the expectation that applicants will also demonstrate that it has made good use of available land achieves appropriate densities as required by NPPF Paragraph 129.

- 5.12 The Council recognises that it is likely to receive applications outside of defined BUABs and on unallocated sites as it is unable to demonstrate a five-year housing land supply. Given this position and the principles behind HDPF Policy 4, it will consider positively applications that meet all of the criteria below:
- The site adjoins the existing settlement edge as defined by the BUAB;
  - The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
  - The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;
  - The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and
  - The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.

### Deliverability

- 5.13 As the Council wishes to improve its housing land supply position, it is conscious of the need to approve sites that are defined in the NPPF as being 'deliverable' and therefore capable of being included in housing land supply calculations from the point a planning application is determined. This is as the glossary to the NPPF explains that:

*"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."*

- 5.14 Given the national policy position, the Council's clear preference is for applicants to apply for full planning permission for schemes compliant with the HDPF and this document, indicating their commitment to deliver sites awarded planning permission and helping to improve the Council's housing land supply.

- 5.15 Notwithstanding the expectation that applications for full planning permissions will be made, the Council recognises that on large and/or complex sites, applications for



outline planning permission may be submitted. In such instances, the Council would prefer hybrid applications that seek full planning permission for part of their proposal (including initial development phases) with an outline application for the remainder of the site.

- 5.16 To support any form of outline application, relevant supporting information will be requested to demonstrate when development would be expected to be delivered. This will include details relating to land ownership, partnership agreements with developers, phasing plans, timings for the submission of reserved matters applications and any other relevant information, with the Council mindful that the Government may introduce requirements on applicants to provide details about delivery.
- 5.17 To encourage timely progression of schemes awarded planning permission, and in accordance with Paragraph 81 of the NPPF, the Council may wish to impose conditions that shorten the length of years from date of grant of planning permission by which development must commence, and/or the period within which all reserved matters must be submitted. This will be considered on a case-by-case basis, for example where there is a clear need or agreement that development be expedited.

### Meeting Local Housing Needs

- 5.18 The Council's approach to meeting local housing needs is set out in Policy 16 of the HDPF. This sets out that the latest Strategic Housing Market Assessment – currently the Northern West Sussex SHMA 2019<sup>20</sup> - should be used in establishing the housing mix provided in a new development and that the mix should also take into account established character and density of a site as well as the viability of a scheme. Such principles will still form the basis of decisions on planning applications and applicants are advised to consider the SHMA's findings, as well as local housing needs work supporting a relevant Neighbourhood Plan, when progressing schemes.
- 5.19 The same policy also sets out affordable housing requirements and is supported by the Planning Obligations and Affordable Housing SPD<sup>21</sup>. It specifies that in schemes that would deliver 15 or more dwellings that the Council will seek 35% of the homes to be affordable, and that on schemes of between 5 and 14 it would seek 20% of the homes to be affordable. On the latter requirement, the Council recognises that to seek affordable housing from housing sites not defined as major development would be inconsistent with national policy<sup>22</sup>. It accordingly no longer seeks affordable housing on schemes of less than 10 homes except where situated in the High Weald National Landscape (which is a designated rural area). The following requirements will therefore apply for market-led residential development outside the High Weald National Landscape:

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<sup>20</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf)

<sup>21</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0005/66821/Planning-Obligations-and-Affordable-Housing-September-2017.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0005/66821/Planning-Obligations-and-Affordable-Housing-September-2017.pdf)

<sup>22</sup> NPPF Paragraph 65

*Table 1: Summary of affordable housing requirements*

Number of Homes	Affordable Housing Requirement
1 – 9 homes	No policy requirement for affordable housing
10 – 14 homes	20% affordable housing
15 or more homes	35% affordable housing

- 5.20 Different requirements apply for rural exception sites. HDPF Policy 17: Exceptions Housing Schemes, which is consistent with NPPF paragraph 82 and NPPF Glossary and therefore attracts full weight, sets out criteria for considering such schemes.
- 5.21 As set out in paragraph 6.8 of the HDPF, the Council seeks 70% of affordable homes to be provided as Social Rent or Affordable Rent units, and 30% as intermediate or Shared Ownership units (or other affordable routes to home ownership)<sup>23</sup>. These figures are as per the recommendation in the Northern West SHMA 2019.
- 5.22 NPPF Paragraph 66 requires that for major development involving the provision of housing, the mix of affordable housing required should meet identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures. The Council's evidence<sup>24</sup> indicates that a majority of households in need could not afford an affordable rent without claiming benefits, and suggests the Council should aim to secure Social Rented housing as a starting point in Section 106 negotiations – this might particularly focus on larger homes where the affordability gap between market and social rents are greatest. The Council will therefore seek the delivery of social rented homes provided the site and its location is appropriate as informed by local evidence, and where provided this will be considered positively. The balance of affordable tenures will be informed by advice from the Council's Housing team.
- 5.23 The Council undertook a Viability Study<sup>25</sup> to support the affordable housing policy in the eLP. The report indicates that schemes on greenfield sites that deliver 10 or more homes (gross) or exceed 0.5 hectares, can deliver at least 45% of all homes as

<sup>23</sup> The NPPF Glossary entry for Affordable Housing sets out the different types of affordable housing.

<sup>24</sup> Horsham Social Rented and First Homes Study - [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0012/120171/Social-Rented-Housing-and-First-Homes-Study-2022.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0012/120171/Social-Rented-Housing-and-First-Homes-Study-2022.pdf)

<sup>25</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0016/104821/210726-HLP-Viability-Assessment\\_Submission-Version-V1-red.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0016/104821/210726-HLP-Viability-Assessment_Submission-Version-V1-red.pdf)

affordable housing. The viability evidence was based on a tenure split for affordable housing of 70%/30%. The 45% requirement is reflected in Strategic Policy 16 of the eLP, and further strengthens the evidence for such sites to deliver at least 35% affordable housing. The Council encourages strongly applicants to consider the findings of the Viability Study and the wording of the Strategic Policy 16 of the eLP in developing proposals and would consider positively schemes that exceed current policy requirements for affordable homes.

- 5.24 NPPF paragraph 71 states that mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build. Therefore, when determining planning applications, the Council will give positive weight to proposals that offer a variety of tenures, subject to the qualification in the NPPF paragraph 71, and subject to compliance with relevant development plan policies.

## Biodiversity

- 5.25 Policy 31 of the HDPF, as supported by Strategic Policy 25, contains the Council's approach to green infrastructure and biodiversity. The approach underlines that the Council wishes to protect and enhance the natural assets in the district and aligns with both the Climate and Ecological emergency declared by the Council in June 2023 and the principles of the Council's Green Infrastructure Strategy (2024)<sup>26</sup>. These policies remain consistent with Government policy contained in Chapter 15 of the NPPF and the overarching objectives of sustainable development set out in paragraph 8 of the NPPF.
- 5.26 In addition to the strong statutory and policy protections for statutory protected sites, protected species and irreplaceable habitats, the Environment Act 2021 increased the Government's commitment to improving the natural environment and biodiversity. As part of this, it made it mandatory for all development, (unless specified as exempt), to deliver at least 10% biodiversity net gain (BNG). Emerging evidence<sup>27</sup> suggesting that 12% BNG would be achievable in most circumstances in the district. The Council would encourage all applicants to achieve higher levels of BNG, and any additional provision would be considered to be a benefit weighing in favour of the scheme. The Council has produced advice<sup>28</sup> in relation to BNG, that applicants are encouraged to have regard to.

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<sup>26</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0013/132610/Green-Infrastructure-Strategy-January-2024.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0013/132610/Green-Infrastructure-Strategy-January-2024.pdf)

<sup>27</sup> Biodiversity Net Gain Thresholds, Site Assessment Study & Green Call for Sites (January 2023): [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0016/121705/Horsham-BNG-Assessment.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0016/121705/Horsham-BNG-Assessment.pdf)

<sup>28</sup> <https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain>

- 5.27 Significant on-site BNG proposals will need to be secured by legal agreement, and managed and monitored for a minimum of 30 years. Significant in this context is defined as the following:
- 1) where the overall net change in Biodiversity Units is 0.5 or more; and/or
  - 2) the gain relates to habitats of high or very high distinctiveness (as defined within the Statutory Biodiversity Metric User Guide); and/or
  - 3) in the case of major development, where the gain relates to habitats of medium distinctiveness.
- 5.28 The Council strongly encourages all development to take a landscape led approach and to consider biodiversity at an early concept and design stage, and all subsequent stages, in accordance with Planning Practice Guidance<sup>29</sup>. It will continue to seek biodiversity enhancements and gains in development exempt from the mandatory requirements in accordance with Policies 25 and 31 of the HDPF and paragraphs 8 and 187 of the NPPF.
- 5.29 Policy 43 of the HDPF relates to the retention and provision of open space which, when read with Policy 39 of the HDPF relating to infrastructure provision, plays a key role in the delivery of green infrastructure, including biodiversity. By virtue of these policies, development is required to accord with the open space standards set out in the Open Space, Sport and Recreation Review 2021<sup>30</sup>. Guidance on the overlap between the provision of biodiversity net gain and the natural semi-natural open space standard is set out in paragraph 4.3.8 criterion 9 of the Green Infrastructure Strategy.
- 5.30 In addition to the BNG requirements, the Environment Act 2021 also seeks to introduce a national Nature Recovery Network (NRN), informed by 48 Local Nature Recovery Strategies (LNRSs) led by responsible authorities. West Sussex County Council is the appointed responsible authority for the West Sussex LNRS, the production of which ran alongside the East Sussex and Brighton & Hove LNRS. Therefore, the Council encourages development that makes a positive contribution to biodiversity, including the creation of linkages that enhance or connect priority habitats together particularly where it aligns with the West Sussex LNRS<sup>31</sup>. Proposals will be expected to consider how they can overcome habitat fragmentation and create connected habitats.

## Climate Change

- 5.31 At a meeting of Full Council on 23 June 2023, Horsham District Council declared a Climate and Ecological Emergency. This declaration provides a clear steer for the Council and the Council has committed to the development and implementation of a

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<sup>29</sup> <https://www.gov.uk/guidance/biodiversity-net-gain#:~:text=How%20is%20biodiversity,74%2D002%2D20240214>

<sup>30</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0020/104249/Open-Space-Rprt-Jun2021FINAL.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/104249/Open-Space-Rprt-Jun2021FINAL.pdf)

<sup>31</sup> At the time of writing, the West Sussex LNR is not yet published, but a NRN has been mapped in Horsham District via the Wilder Horsham District Initiative. Applicants are encouraged therefore to review the information related to this on the Council's website: <https://www.horsham.gov.uk/climate-and-environment/climate-action-across-the-district/wilder-horsham-district/horsham-district-nature-recovery-networks>

range of measures<sup>32</sup> that work towards a net zero carbon target, to achieve the national commitment by 2050 and aspires to achieve net zero carbon from its own activities by 2030.

- 5.32 Legislation is clear that it is a fundamental requirement to combat the causes of climate change and mitigate its ongoing effects. In terms of the NPPF and PPG, addressing climate change is one of the core land use planning principles expected to underpin both plan-making and decision taking. The NPPF emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development and aligns with HDPF policies 35-38 that seek to address the district's contribution to climate change.
- 5.33 The Council recognises that reforms to the building regulations are being proposed by Government which seek to reduce carbon emissions and increase energy efficiency and that all development will be required to abide by such regulations. However, the Council encourages applicants to go further given the context described, and applicants are advised to fully consider the impacts of climate change from the onset of early design, taking account of the landform, layout, building orientation, massing and landscaping to minimise energy consumption. Sustainable design and construction is also a key mechanism to address climate change, minimising the environmental impact of new development – both during the construction and operation of the development. The Council advises that consideration should also be given to non-carbon and/or low carbon based forms of energy, including heat pumps and /or renewable energy. In addition, sustainable and active modes of transport and forms of movement should be facilitated and actively promoted as an alternative to private car use in order to further reduce carbon emissions.
- 5.34 When designing schemes, applicants are also encouraged to take account of changes to the climate, with more extreme weather, including high temperatures, drought and intense rainfall, expected to become more prevalent. Given that Horsham District is an area of water stress, measures to reduce water consumption are encouraged, while the provision of green and blue infrastructure is likely to be welcomed as it can reduce the impact of extreme temperatures.

## Transport

- 5.35 HDPF Policy 40 sets out the Council's approach to sustainable transport. In general, the policy expects sustainable and active modes of transport and movement as an alternative to private car use. It makes clear that development will be supported if, amongst other criteria, it is located in areas where there are or will be a choice in the modes of transport available, and is integrated with the wider network of routes, including public rights of way and cycle paths. The policies align with the NPPF and the Council expects them to be embedded in any development scheme. Further, it is expected that proposals will demonstrate accordance with the principles and priorities set out in the West Sussex Transport Plan 2022-2036<sup>33</sup>, Local Transport Note 1/20:

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<sup>32</sup> <https://www.horsham.gov.uk/climate-and-environment>

<sup>33</sup> <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/>

Cycle Infrastructure Design<sup>34</sup> and the Horsham Local Cycling & Walking Infrastructure Plan<sup>35</sup> and any subsequent updates to these documents. The NPPF (Section 9) makes clear that transport issues should be considered from the earliest stages of development proposals, whilst HDPF Policy 39 requires that appropriate improvements should be completed prior to occupation of the development or relevant phase.

- 5.36 Additionally, the Council's approach to cycle and car parking is set out in HDPF Policy 41, which seeks to balance the need for parking whilst ensuring that parking is well located and does not conflict with other uses. West Sussex County Council has produced cycle and car parking guidance for new development<sup>36</sup>, which applicants are advised to consider when working up development schemes. Applicants are also referred to the National Design Guide<sup>37</sup> and National Model Design Code<sup>38</sup> for best practice advice on cycle and car parking design.

## Design

- 5.37 The NPPF is clear that good design is a fundamental element in sustainable development and paragraph 139 of the NPPF explains that *"development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design"*. The creation of high quality, beautiful and sustainable buildings and places is essential to what the planning and development process should achieve.
- 5.38 Strategic Policy 32: The Quality of New Development and Policy 33: Development Principles of the HDPF set out the Council's requirements in terms of design and remain up to date. Applicants must consider the relevance of all criteria in relation to their proposal. In terms of Policy 33, applicants must be aware that they may be asked to justify why they do not consider any specific element of the policy is relevant to their application.
- 5.39 The National Design Guide, National Model Design Code and Guidance Notes for Design Codes<sup>39</sup> illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. They form part of the

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf)

<sup>35</sup>

<https://horsham.moderngov.co.uk/documents/s15932/LCWIP%20Appendix%201%20Main%20Document%20October%202020.pdf>

<sup>36</sup> [https://www.westsussex.gov.uk/media/1847/guidance\\_parking\\_res\\_dev.pdf](https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf)

<sup>37</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/962113/National\\_design\\_guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf)

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/957205/National\\_Model\\_Design\\_Code.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf)

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/957207/Guidance\\_notes\\_for\\_Design\\_Codes.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957207/Guidance_notes_for_Design_Codes.pdf)



Government's collection of planning practice guidance and should be read alongside the PPG section on design process and tools<sup>40</sup>. The Council has also produced guidance for those applying for planning permission for home extensions<sup>41</sup>. The Council recommends such guidance, and any subsequent advice, is taken account of when preparing relevant applications.

## Heritage

5.40 The NPPF asserts that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance. Such assets include over 1,800 listed buildings and 39 conservation areas. Applicants are encouraged to make use of advice and documentation contained on its webpages relating listed buildings<sup>42</sup> and conservation areas<sup>43</sup>, when preparing relevant applications.

5.41 The Council will preserve and enhance its historic environment through positive management of development affecting designated and non-designated heritage assets, and their settings. Applicants must consider the criteria set out in Strategic Policy 34: Cultural and Heritage Assets in addition to paragraphs 212 to 216 of the NPPF.

5.42 As stated in NPPF Paragraph 212, *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."* Therefore, proposals which would lead to substantial harm to, (or total loss of significance of), a designated heritage asset will not be supported unless it can be demonstrated that the substantial public benefits gained would outweigh the substantial harm or total loss of the asset. Proposals which would lead to less than substantial harm to the significance of the heritage asset should be weighed against the public benefits of the proposal and will only be supported where public benefit is considered to outweigh the harm.

## Employment

5.43 It is considered the employment policies of the HDPF remain justified and up to date. These policies seek to encourage new employment development and also seek to retain existing premises. The policies are consistent with the NPPF which makes clear planning should positively and proactively encourage sustainable economic development and should meet the economic development needs of the area.

5.44 Notwithstanding the above, in respect of Strategic Policy 8, the former Novartis site is no longer required by the University of Brighton as a new higher education campus.

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<sup>40</sup> <https://www.gov.uk/guidance/design>

<sup>41</sup> <https://www.horsham.gov.uk/planning/planning-applications/planning-permission-for-home-extensions>

<sup>42</sup> <https://www.horsham.gov.uk/planning/listed-buildings/what-is-a-listed-building>

<sup>43</sup> <https://www.horsham.gov.uk/planning/conservation-areas/maps-and-character-statements>

This means any policy compliant development would need to accord with the sequential test set out in criterion 15 of the policy, taking into account the general design and layout principles set out in the other criteria.

- 5.45 The Council's most recent employment evidence is set out in the Northern West Sussex Economic Growth Assessments (EGAs) and related documents (Jan 2020<sup>44</sup> [including Appendix 5<sup>45</sup>] and Nov 2020<sup>46</sup>). Importantly, the EGAs identifies Horsham town as the primary settlement for focusing employment development in the district – supporting the approach in the HDPF, including the provisions of HDPF Policy 5.
- 5.46 The EGAs and site assessment work<sup>47</sup> justified the identification of employment site allocations in the wLP, alongside existing commitments. The allocations are also supported by further site assessment studies. As with residential uses, it is the Council's view that the proposed site allocations were based on robust evidence and are capable of accommodating sustainable development. Such allocations are identified in Appendix 4. For this reason, the Council will consider positively employment proposals (Use classes B2, B8 and E(g)) on sites identified in the wLP, which accord with such evidence. Therefore, the Council would encourage applicants to have regard to site-specific matters identified in the wLP, including the quantum of development.
- 5.47 The Enterprising Horsham framework<sup>48</sup> outlines the Council's vision and guiding principles to help deliver the aims in the Council Plan. Applicants are encouraged demonstrate how their proposal contributes towards achieving the aims of the Enterprising Horsham framework.
- 5.48 The Council strongly encourages large scale housing led proposals to make provision for employment uses within such proposals, to ensure that employment opportunities exist within areas of population growth. This is consistent with criteria 3 of HDPF Policy 7.

## Retail

- 5.49 Two HDPF policies relate directly to retail; Policy 12: Vitality and Viability of Existing Retail Centres and Policy 13: Town Centre Uses. Policy 6: Broadbridge Heath Quadrant also deals with the redevelopment of a specific site in the district where out of town retail would be acceptable.
- 5.50 The approach to retail in national policy and guidance, in the NPPF, the PPG and via the Use Classes Order and permitted development rights, mean the HDPF policies are

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<sup>44</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0007/79261/Northern-West-Sussex-Economic-Growth-Assessment-24.01.20.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0007/79261/Northern-West-Sussex-Economic-Growth-Assessment-24.01.20.pdf)

<sup>45</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0010/79354/Economic-Growth-Assessment-Appendix-5.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0010/79354/Economic-Growth-Assessment-Appendix-5.pdf)

<sup>46</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0018/104247/Northern-West-Sussex-Economic-Growth-Assessment-Focused-Update-for-Horsham-for-Horsham-Nov-2020.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0018/104247/Northern-West-Sussex-Economic-Growth-Assessment-Focused-Update-for-Horsham-for-Horsham-Nov-2020.pdf)

<sup>47</sup> Links to relevant sections of the Site Assessment Report (December 2023): [Part A](#), [Part B](#), [Part E](#), [Part F](#)

<sup>48</sup> <https://www.horsham.gov.uk/business/enterprising-horsham>



somewhat out of alignment with how a decision maker would be expected to consider applications which relate to new, or loss of retail uses. However, the HDPF's broad aim to protect the viability and vitality of town centres, offering a flexible, diverse and cohesive range of uses to ensure town centres are resilient to changes in shopping behaviours and remain the focus for community life, are still consistent with national policy and guidance. Applications for changes of use or new provision should demonstrate they will enhance the resilience of the town centre hierarchy and do not undermine these wider objectives.

- 5.51 Changes to the Use Class Order<sup>49</sup> mean A, B, and D Class uses have been revoked and new Classes E, F1 and F2 replace them. Many use changes previously managed through HDPF Policy 13 are now not considered a change of use, so may not require planning permission. The NPPF encourages policies to define the range of permitted uses in defined areas within town centres. While the precise designations of uses for primary and secondary frontages, and main shopping areas, set out in Policy 13 are no longer applicable the preference for active frontages, and for the retention of retail or other town centre uses within these boundaries remains. So too does the resistance to main town centre uses outside of defined town centres. The only exception to this is in the Broadbridge Heath Quadrant (Policy 6) where out of town retail is considered acceptable as part of a mix of uses.
- 5.52 The town centre hierarchy set out in Policy 12 remains consistent with the approach set out in paragraph 90 of the NPPF in respect of a defined hierarchy of town centres which indicates how retail and other town centre uses should be prioritised and directed based on the role each centre performs and the extent to which it meets the needs of local communities.
- 5.53 The Enterprising Horsham Economic Prospectus<sup>50</sup> outlines the Council's vision to help deliver the aims in the Council Plan. Applicants should demonstrate how their proposal contributes towards achieving the aims of the Enterprising Horsham framework.

## Infrastructure

- 5.54 HDPF Policy 39: Infrastructure Provision addresses the need for development to be accompanied by sufficient enhancements to existing infrastructure, or new infrastructure provision, to offset impacts and make development sustainable. It encourages applicants to consider what infrastructure provision will be required early in the design of a scheme, and to engage with relevant infrastructure providers to ensure the phasing and timing of development is not impacted by the limited capacity of infrastructure in place already.
- 5.55 The policy also makes explicit that the Council will use both planning obligations and conditions as well as the Community Infrastructure Levy, to secure and deliver the infrastructure required. This includes phasing and pre-occupation conditions, where necessary.

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<sup>49</sup> <https://lichfields.uk/media/vj4lnh3u/guide-to-the-use-classes-order-in-england.pdf>

<sup>50</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0011/146684/FINAL-L25\\_ED02-Enterprising-Horsham-Economic-Prospectus.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0011/146684/FINAL-L25_ED02-Enterprising-Horsham-Economic-Prospectus.pdf)

- 5.56 The Council's Interim Infrastructure Delivery Plan<sup>51</sup> was adopted in March 2025 and presents the most recent assessment of infrastructure need in the District. While this document does not provide an exhaustive list of the infrastructure provision necessary to address all development scenarios (given that some applications for development will require a unique and scheme-specific mitigation and provision) it indicates where there are known shortfalls or capacity issues where it will likely be necessary for developers to engage with infrastructure providers proactively to protect the amenity of new and existing communities. The Interim IDP will be updated regularly to ensure it remains an accurate and relevant reflection of the infrastructure baseline and any capacity issues.

### Gypsies and Travellers

- 5.57 It is considered that HDPF policies 21-23, insofar as they relate to the determination of planning applications, remain broadly consistent with national policy as expressed in the NPPF and Planning Policy for Traveller Sites (PPTS) document. Accordingly, applications will be supported if they come forward on allocated sites identified in Policy 21 and any application for Gypsy and Traveller (G&T) provision will be assessed against the criteria in Policy 23.
- 5.58 The Council's Authority Monitoring Report 2023/24<sup>52</sup>, recognises that at the time of writing, that the Council is unable to demonstrate a five year supply of G&T provision. PPTS paragraph explains 28 that "if a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in para 11(d) of the National Planning Policy Framework apply." Accordingly, the 'tilted balance' is effect for G&T applications and will operate in the same way as for applications for housing.
- 5.59 As with proposed housing allocations, the eLP seeks to allocate a number of sites to meet the needs for G&T provision. These sites are identified in Strategic Policy 43 of the eLP and Appendix 5 of this document. It is similarly considered that the site allocations were based on robust evidence<sup>53</sup> and that they could accommodate sustainable development. As such, the Council will consider proposals on such sites positively, which accord with eLP (including the quantum of pitches).

### Inclusive Communities

- 5.60 Paragraph 63 of the NPPF identifies that the needs arising from all sections of the community should be considered when establishing the need, size, type and tenure of housing required. Policy 42 of the HDPF recognises that there are likely to be specific needs arising from the aging population, and those with disabilities amongst others. Chapter 10 of the Northern West Sussex SHMA (November 2019) provides the most recent assessment of these needs, which recognises that it would be appropriate for new housing to be delivered to meet Part M4(2) accessible and adaptable home standards, subject to viability testing. Applicants are therefore encouraged to consider whether they are able to deliver an element of such housing in order to meet the identified requirement for the District.

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<sup>51</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0004/146191/Interim-IDP-2025.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0004/146191/Interim-IDP-2025.pdf)

<sup>52</sup> <https://www.horsham.gov.uk/planning/planning-policy/authority-monitoring-report>

<sup>53</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0004/132583/HDLP-GT-Site-Assessments-Dec2023.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0004/132583/HDLP-GT-Site-Assessments-Dec2023.pdf)

## Appendix 1: Status of Neighbourhood Plans

Below is a table showing the status of Neighbourhood Plan as of August 2025. Up to date information about each Neighbourhood Plan is kept on the Council's website<sup>54</sup>.

*Table 2: A table showing the status of Neighbourhood Plans as of August 2025*

Neighbourhood Plan Area	Date of Making/Stage of Preparation	Includes housing allocations to meet identified need?
<b>Made Neighbourhood Plans</b>		
Nuthurst	21 October 2015	Yes
Thakeham	26 April 2017	Yes
Shermanbury and Wineham	22 June 2017	Yes
Woodmancote	22 June 2017	No
Slinfold	6 September 2018	Yes
Warnham	27 June 2019	Yes
Storrington, Sullington and Washington	5 September 2019	Yes
Ashington	24 June 2021	Yes

<sup>54</sup> <https://www.horsham.gov.uk/planning/neighbourhood-planning>

Neighbourhood Plan Area	Date of Making/Stage of Preparation	Includes housing allocations to meet identified need?
Billingshurst	24 June 2021	No
Bramber	24 June 2021	No
Henfield	24 June 2021	Yes
Rudgwick	24 June 2021	No
Rusper	24 June 2021	No
Shipley	24 June 2021	No
Southwater	24 June 2021	Yes
Upper Beeding	24 June 2021	Yes
West Grinstead	24 June 2021	No
Steyning	7 September 2022	No
Horsham Blueprint	14 December 2022	No
<b>Emerging Neighbourhood Plans</b>		
Cowfold	Referendum (scheduled 4 September 2025)	Yes
Itchingfield	Referendum (scheduled 4 September 2025)	Yes

Neighbourhood Plan Area	Date of Making/Stage of Preparation	Includes housing allocations to meet identified need?
Lower Beeding	Referendum (scheduled 4 September 2025)	Yes
Pulborough	Referendum (scheduled 4 September 2025)	Yes
West Chiltington	Examination (commenced in July 2025)	Yes

## Appendix 2: Sites Identified as housing allocations in Emerging Local Plan

A table identifying the proposed housing allocations in the emerging Local Plan is shown below.

*Table 3: A table identified proposed allocations in the emerging Local Plan*

Proposed allocation	Number of homes
<b>Strategic Sites</b>	
HA2: Land West of Ifield	3,000 (1,600 within the plan period)
HA3: Land North West of Southwater	1,000 (735 within the plan period)
HA4: Land East of Billingshurst	650
<b>Settlement Site Allocations</b>	
HA5: Ashington ASN1: Land East of Mousdell Close	75
HA6: Barns Green BGR1: Land South of Smugglers Lane BGR2: Land South of Muntham Drive BGR3: Land at the Old School Site	50 25 20
HA7: Broadbridge Heath BRH1: South of Lower Broadbridge Farm	133
HA8: Cowfold CW1: Fields West of Cowfold, North of A272 CW2: CW2: Fields West of Cowfold, South of A272/Field West of Cowfold, South of A272, West of Little Potters	35 35
HA9: Henfield HNF1: Land at Sandgate Nurseries	55
HA10: Horsham	

Proposed allocation	Number of homes
HOR1: Land at Hornbrook Farm	100
HOR2: Land at Mercer Road	300
HA11: Lower Beeding	
LWB1: Land at Glayde Farm, West of Church Lane	30
LWB2: Land at Trinity Cottage (Land South of Church Farm House	7
LWB3: Land at Cyder Farm 0.15 hectares	6
HA12: Partridge Green	
PG1: Land North of the Rosary (West of Church Road)	80
PG2: Land North of the Rise	55
PG3: Land at Dunstons Farm	120
HA13: Pulborough	
PLB1: Land at Highfields	25
HA14: Rudgwick and Bucks Green	
RD1: Land North of Guildford Road	60
RD2: The Former Pig Farm	6
HA15: Rusper	
RS1: Land at Rusper Glebe	12
RS2: Land north of East Street	20
HA16: Small Dole	
SMD1: Land west of Shoreham Road, Henfield	40
HA17: Steyning	
STE1: Land at Glebe Farm	265
HA18: Storrington	
STO1: Land to the north of Melton Drive and Land South of Northlands Lane	70
STO2: Land at Rock Road	55
HA19: Thakeham	
TH1: Land North of High Bar Lane	25

Proposed allocation	Number of homes
TH2: Land West of Stream House	40
HA20: Warnham WRN1: Land South of Bell Road	20
HA21: West Chiltington and West Chiltington Common WCH1: Land at Hatches Estate WCH2: Land West of Smock Alley, South of Little Haglands WCH3: Land East of Hatches House	15 15 8



## Appendix 3: Policies 3 and 4 of the Horsham District Planning Framework

The policy wording of policies 3 and 4 of the Horsham District Planning Framework (HDPF) are found below.

### Policy 3

#### Strategic Policy: Development Hierarchy

Development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy below:

*Table 4: A table showing the Council's Settlement Hierarchy*

Settlement Type	Settlement Characteristics and Function	Settlements
<b>Main Town</b>	Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.	Horsham
<b>Small Towns and Larger Villages</b>	These are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements	Billingshurst, Bramber and Upper Beeding, Broadbridge Heath, Henfield, Pulborough and Codmore Hill, Southwater, Steyning, Storrington & Sullington*
<b>Medium Villages</b>	These settlements have a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day to day needs for residents, but rely on small market towns	Ashington, Barns Green, Cowfold, Partridge Green, Rudgwick and Bucks Green, Slinfold, Warnham, West Chiltington Village and Common

Settlement Type	Settlement Characteristics and Function	Settlements
	and larger settlements to meet a number of their requirements.	
<b>Smaller Villages</b>	Villages with limited services, facilities, social networks but with good accessibility to larger settlements (e.g. road or rail) or settlements with some employment but limited services facilities or accessibility. Residents are reliant on larger settlements to access most of their requirements.	Christ's Hospital, Lower Beeding, Mannings Heath, Rusper, Small Dole, Thakeham (The Street and High Bar Lane)
<b>Unclassified settlements</b>	Settlements with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residents	All other settlements

\* This does not include the hamlet of Sullington which is located entirely within the South Downs National Park

## Policy 4

### Strategic Policy: Settlement Expansion

The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;

1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.
2. The level of expansion is appropriate to the scale and function of the settlement type.
3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.
4. The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and
5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

## Appendix 4: Sites Identified for Employment use in Emerging Local Plan

A table identifying the proposed employment allocations in the Emerging Local Plan is shown below.

*Table 5: A table identifying employment site allocations in the emerging Local Plan*

Site	Indicative employment floorspace
<b>Strategic Allocations</b>	
HA2: Land West of Ifield	Around 2.0 hectares
HA3: Land North West of Southwater	Around 4.0 hectares
HA4: Land East of Billingshurst	Around 0.5 hectares
<b>New Employment Allocations</b>	
EM1: Land South of Star Road Industrial Estate, Partridge Green	3.8 hectares (around 9,000sqm)
EM2: Land to the West of Graylands Estate, Langhurstwood Road, Horsham	3.0 hectares (around 9,000sqm)
EM3: Land at Broomers Hill Business Park, Pulborough	2.7 hectares (around 7,000sqm)
EM4: Land South West of Hop Oast Roundabout	1 hectare (around 3,000sqm)

## Appendix 5: Sites Identified for Gypsy and Traveller Accommodation in Emerging Local Plan

A table identifying the proposed G&T allocations in the Emerging Local Plan is shown below.

*Table 6: A table identifying proposed G&T allocations in the emerging Local Plan*

Site	Existing Authorised Pitches	Proposed Additional Net Pitches	Total Gross Pitches (Net pitches)
<b>Gypsy and Traveller Pitches</b>			
Land at Junction of Hill Farm Lane and Stane Street, Codmore Hill	2	2	4(2)
Fryern Park, Storrington	2	2	4(2)
Northside Farm, Rusper Road	1	3	4(3)
Southview, The Haven, Slinfold	1	4	5(4)
Sussex Topiary, Rudgwick	4	8	12(8)
Plot 3, Bramblefield, Crays Lane, Thakeham	1	3	4(3)
Land at Girder Bridge, Gay Street Lane, North Heath, Pulborough	0	5	5(5)
Land East of Billingshurst	0	5	5(5)
Land West of Ifield	0	15	15(15)
Land North West of Southwater	0	5	5(5)
Kingfisher Farm, West Chiltington Lane, Barns Green	0	11	11(11)
Land East of Coolham Road, Thakeham	0	2	2(2)
Land North West of Junipers, Harbolets Road, West Chiltington	0	3	3(3)
Downsview Paddock, New Hall Lane, Small Dole	0	1	1(1)

<b>Travelling Showpeople Accommodation</b>	<b>Existing Plots</b>	<b>Proposed Additional Plots</b>	<b>Gross Plots (Net Plots)</b>
Honeybridge Lane, Dial Post	4	1	5(1)