



Horsham
District
Council

Horsham District Local Plan Examination

Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan

Version JB 01: March 2026

Please note:

This schedule amends the *Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan v3*. It only covers development management policies / policy criteria and is not comprehensive.

Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan

This schedule sets out all amendments proposed at the time of the date stated on the front cover to the Regulation 19 Horsham District Local Plan and within the scope set out overleaf. Any earlier proposed modifications within the scope of this document which were shown in earlier Suggested Modifications schedules but not included in this document are no longer proposed by the Council and should be disregarded.

The review responds to the Inspector's letter IDJB01 which invites the Council to review development management (DM) policies in light of the draft NPPF published in December 2025. The following approach has been taken:

- (i) The starting point was the HDC Schedule of Suggested Modifications to Regulation 19 Local Plan - Version 3 - 29.11.2024.
- (ii) The review was limited to DM policies / policy criteria only (i.e. exclude policies relating to strategic matters and site allocation which will be considered at a later stage in the examination process).
- (iii) Proposed modifications have been removed where it is not considered that they are required for soundness.
- (iv) Modifications have been proposed or removed where any policy requirement clearly conflicts with draft National Planning Policy Framework published December 2025 ('draft NPPF').

Within the scope of the policies reviewed, for completeness, minor modifications relating to factual accuracy or crucial clarification are also shown for readability and context. These are shown in *italics* and those rows are shaded light blue.

Proposed deletions are shown as a ~~strikethrough~~ and proposed additions are underlined.

The table below sets out which parts of the plan and policies are within the scope of this suggested schedule of modifications. Chapters and policies not covered will be subject to a further set of modifications to be issued at a later date.

Chapters and policies within scope of review:	Chapters and policies not covered:
<p>Chapter 5: Climate Change and Water [all policies] Chapter 6: Conserving and Enhancing the Natural Environment [all policies] Chapter 7: Development Quality, Design and Heritage [all policies] Chapter 8: Infrastructure, Transport and Healthy Communities [all policies] Chapter 9: Economic Development Strategic Policy 30 – Enhancing Existing Employment Policy 31: Rural Economic Development Policy 32: Conversion of Agricultural & Rural Buildings Policy 33: Equestrian Development Strategic Policy 34: Tourism Facilities & Visitor Accommodation Strategic Policy 35: Town Centre Hierarchy & Sequential Approach Strategic Policy 36: Town Centre Uses Chapter 10: Housing Strategic Policy 38: Meeting Local Housing Needs Policy 39: Affordable Housing Policy 40: Improving Housing Standards in the District Policy 41: Rural Exception Homes Policy 42: Retirement Housing & Specialist Care Strategic Policy 43: Gypsies & Travellers Policy 44: Rural Workers Accommodation Policy 45: Replacement Dwellings & Extensions in the Countryside Policy 46: Ancillary Accommodation</p>	<p>Chapter 1: Introduction [whole chapter] Chapter 2: Planning Context [whole chapter] Chapter 3: Spatial Vision and Objectives [whole chapter] Chapter 4: Policies for Growth and Change [all policies] Chapter 9: Economic Development Strategic Policy 29: New Employment Chapter 10: Housing Strategic Policy 37: Housing Provision Housing Allocations [all housing allocation policies] List of Figures List of Tables Glossary</p>

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
	1 – 4	All	Policies are out of scope. Any modifications to these policies will be considered at a later date.		
NEW	5	Opening paragraph (green box) first bullet	Amend "carbon neutral" to read "net zero" throughout: Horsham District Council has declared a Climate and Ecological Emergency. It aims for its own activities to be carbon neutral net zero by 2030. The national target for carbon neutrality net zero is 2050.	To align with terminology in NPPF	Yes consistent with terminology in draft NPPF.
Old:SM08	5	Para 5.9 (SP6)	Amend first sentence to read: In line with the Horsham District Council Climate Action Strategy, the Council's expectation is that new development that takes place is as a minimum designed to be net zero carbon <u>zero carbon emissions</u> in construction and operation.	Correction of terminology	Yes – consistent with decision-making policy CC2 of the draft NPPF.
Old:SM08 (2)	5	Para 5.9 (SP6)	Amend first sentence to read: In line with the Horsham District Council Climate Action Strategy, the Council's expectation is that new development that takes place is as a minimum designed to <u>contribute to</u> net zero carbon in construction and operation.	Correction of terminology	Yes – consistent decision-making policy CC2 of the draft NPPF.
NEW	5	Para 5.12 (SP6)	Delete whole paragraph: Existing buildings contain embodied carbon (i.e., carbon that was emitted during the construction process) and so it is important that that this already emitted carbon is not 42 wasted through the needless demolition of existing structures. Where demolition is unavoidable, applications will be required to demonstrate how the on-site embedded carbon has been retained.	There is no requirement in extant or emerging national policy to retain existing structures or to demonstrate how embedded carbon is retained.	Yes with deletion.
Old:SM10	5	Strategic Policy 6: Climate Change	Change criterion 1(e) as follows: Using patterns of development and providing sustainable transport infrastructure which to reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport, improving infrastructure as	To clarify that the policy seeks improvements to sustainable transport infrastructure as necessary to reduce the	Yes – the policy and amendment are consistent

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<i>necessary to support this, and ensure residents have access to services and facilities that are within walking distance;</i>	<i>need to travel (as distinct from providing such infrastructure where it is not needed or not proportionate to what is proposed). Change made in response to Inspector's MIQs Matter 3 Issue 1 Question 1(d).</i>	<i>with plan-making policies TR1, TR2, HC1, and decision-making policies S5, CC2, HO9, L3, DP3, TR3 of the draft NPPF.</i>
NEW	5	Strategic Policy 6: Climate Change	Delete text requiring sustainability statement: Sustainability Statement 4. Development will be supported provided a Sustainability Statement is submitted which demonstrates how the development has taken measures to mitigate and adapt to the effects of climate change.	There is no support in National Policy for requiring a sustainability statement for all development.	N/A
NEW	5	Para 5.14 (SP7)	Amend "carbon neutral" to read "net zero" throughout: "There is an expectation that developments will be constructed to energy performance standards that push beyond Building Regulations in order to work towards achieving <u>carbon neutrality net zero</u> by 2050 at the very latest.	To align with terminology in NPPF	Yes consistent with terminology in NPPF.
Old:HM01 3	5	Para 5.16 (SP7)	Amend paragraph to: "The development of renewable and low carbon energy is a key means of reducing the District's contribution to climate change. Renewable and low carbon energy can encompass a wide range of technologies including combined heat and power (CHP); combined cooling, heat and power (CCHP); district heating, energy from waste , wind (large and small scale), biomass, solar (thermal and photovoltaics) and heat-pumps."	To reflect that emerging mandatory food and waste composting/recycling will drastically reduce biogenic content of residual waste, and that the (usually very) inefficient combustion of residual waste should not be regarded as a viable	N/A

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
				<i>low carbon energy source.</i>	
NEW	5	Para 5.17 (SP7)	Amend the end of the paragraph to: “the <u>forthcoming</u> Future Homes Standard <u>effectively is expected to</u> prohibits the installation of individual gas boilers in newly built properties from 2025 . To avoid unnecessary costs in the future, new homes constructed prior to 2025 should be heated through zero or low carbon sources as opposed to gas boilers.”	To reflect the delay in implementation of the FHS. Legislation is expected to be laid in 2026	N/A (No mention of FHS in draft NPPF)
NEW	5	Para 5.18 (SP7)	Delete this paragraph: 5.18 Due to the variations in the suitability, type and scale of energy resources which could be used throughout the District, a bespoke renewable/low carbon sourced energy target will be expected for individual proposals, which should be justified in the Energy Statement that accompanies the planning application. This will ensure that opportunities for greater carbon savings are maximised through renewable and low carbon sources. Horsham District Council will work proactively with developers to ensure these requirements are met. The Energy Statement should also consider how the scheme’s energy performance will be monitored against targets. Renumber subsequent paragraphs.	There is no support in National Policy for requiring an energy statement for all development.	Yes, with amends
Old:SM11	5	Strategic Policy 7: Appropriate Energy Use	Strategic Policy 7: Appropriate Energy Use Energy Hierarchy 1. Development will be supported provided that it contributes to clean, efficient energy in Horsham based on the following cascade:	Written Ministerial Statement 2023 states that that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination	Yes, with amends

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<p>a) Be Lean — use less energy — for example, by minimising energy demand through energy efficiency measures such as fabric performance and passive design;</p> <p>b) Be Clean — supply energy efficiently and exploit local energy resources such as secondary heat and district energy networks where available. Preference must be given to technologies with greater efficiencies and fuels with lower carbon emissions to achieve the highest total lifecycle carbon emission savings, in accordance with Part 2 of this policy;</p> <p>c) Be Green — maximise the use of renewable energy sources.</p> <p>d) Be Seen — monitor, verify and report on energy performance.</p> <p>Zero and Low Carbon Heating</p> <p>2. 1. Development proposals must demonstrate how will be afforded positive weight where they will provide zero and low carbon heating in accordance with the following hierarchy. Evidence must be provided that opportunities to meet each level of the hierarchy have been exhausted before cascading to the next level by:</p> <p>a) Connect to local existing or planned heat networks*, in combination with on-site renewable energy generation, <u>or</u></p> <p>b) Maximise use of on-site renewable energy generation, <u>or</u></p>	<p>(other than in specific circumstances which are not reflected in the policy). Emerging NPPF does not allow for local energy efficiency standards.</p> <p>The use of waste heat sources is no longer considered to be an efficient combustion of residual waste, as well as concerns related to air quality impacts.</p>	

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<p>c) Use of the optimum means of low or zero-carbon heat supply is demonstrated, based on the in-order of preference below:</p> <ul style="list-style-type: none"> i. Use of waste heat sources; ii. <u>i.</u> Electrically-driven ground, water or air source heat pumps;** iii. <u>ii.</u> Direct Electric Heating. ** <p>Energy Statements</p> <p>3. Residential or commercial development will be supported provided that it includes an Energy Statement, (which may be incorporated into the Sustainability Statement), demonstrating how compliance with this policy has been achieved.</p> <p>Renewable Energy Schemes</p> <p>4. <u>2.</u> Stand-alone renewable energy schemes will be supported where they do not conflict with other policies in this Plan. Renewable and low carbon energy generation developments that are led by, or meet the needs of, local communities will carry significant weight.</p> <p>*Where a local heat network is planned but not yet in existence or connection is not currently viable, but may become viable in the future, the development should be designed to allow for the cost-effective connection and supply at a later date. In this case the heat should be supplied according to steps 2b and 2c of the above hierarchy.</p> <p>**Electric heat pumps and direct electric heating are assumed to become zero-carbon when the national grid decarbonises.</p>		

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
NEW	5	Para 5.23 (SP8)	Amend year at end of the last sentence: “FLOS provides an intermediate uplift to the existing energy efficiency standards and is a steppingstone towards the Government’s new Future Homes Standard which is due to be introduced in 2025 <u>2026</u> .”	To reflect the delay in implementation of the FHS. Legislation is expected to be laid in 2026	N/A (No mention of FHS in draft NPPF)
NEW	5	5.24	Amend last sentence: The overall reduction, as outlined in this policy, shall <u>is expected to be delivered through a combination of energy efficiency measures and on-site renewable energy generation.</u>	Consequential change in line with proposed changes to Strategic Policy 8.	Yes, with amends.
NEW	5	Strategic Policy 8: Sustainable Design and Construction	Amend part 1 to remove requirements for specific standards to be met: 1. Development will be supported where it is demonstrated that sustainable design, including its construction and operation, is integrated into the development from the design stage onwards. To deliver sustainable design, development will only be supported where it meets all of the following requirements that are relevant <u>achieves the following:</u> a) New build homes to deliver, as a minimum, carbon emissions reduction as set out in the 2021 Edition (or any future update) of the 2010 Building Regulations (Part <u>L) Maximise the energy efficiency of proposed new-build elements;</u> b) New non-domestic buildings to achieve a BREEAM rating of ‘Excellent’, unless it can be demonstrated that this would make the scheme unviable; c) Incorporate a Fabric First Approach, maximising the performance of the components and materials that form the building fabric itself, before consideration of the use of mechanical or electrical building service systems;	Written Ministerial Statement 2023 states that that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination (other than in specific circumstances which are not reflected in the policy). Emerging NPPF does not allow for local energy efficiency standards. A fabric first approach is not supported by national policy. There is no support in National Policy for requiring a sustainability	Yes, with amends

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<p>Ⓓ) <u>b)</u> Minimise construction and demolition waste, utilise recycled and low-impact materials and incorporate measures that reduce the amount of biodegradable waste sent to landfill;</p> <p>Ⓔ) <u>c)</u> Be designed flexibly to enable future modification of use or layout, facilitating future adaption, refurbishment and retrofitting;</p> <p>Ⓕ) <u>d)</u> Include the provision of gigabit capable broadband access and enable provision of future communication technologies.</p> <p>Delete text requiring sustainability statement: 4. In order to demonstrate compliance, proposals should be accompanied by a Sustainability Statement to demonstrate how these measures will be incorporated into development design.</p>	statement for all development.	
Substantively New (with elements of HM015)	5	Strategic Policy 9: Water Neutrality	<p>Delete all existing text from the policy and supporting text. Rename policy to Water Efficiency. Insert the following wording as supporting text:</p> <p><u>“Much of the South East, including Horsham District, is designated as an ‘area of serious water stress’ by the Environment Agency, with demand for water exceeding supply. Residential development will be required to be water efficient by meeting the optional requirement as identified in Part G of the Building Regulations and be designed to utilise no more than 110 litres per person per day. For non-domestic buildings, the minimum standards for BREEAM ‘Excellent’ within the Water category will apply. Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied.”</u></p> <p>Insert the following as policy:</p> <p>“Strategic Policy 9: <u>Water Efficiency</u></p>	The requirement to demonstrate water neutrality is no longer in force and most of the provisions within the submitted policy is to be deleted. Being designated as an area of water stress, justifies the use of stricter water efficiency standards.	Yes – consistent with plan-making policy PM13(1)(b)(ii) of draft NPPF.

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			1. Residential Development must be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency. For non-domestic buildings, the minimum standards for BREEAM 'Excellent' within the Water category will apply. Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied."		
Old:SM13	5	Strategic Policy 10: Flooding	Amend criterion 1: <i>Development proposals will only be supported where they follow a sequential approach to flood risk management, so that priority is given to development sites and areas with the lowest risk of flooding from all sources, where shown to be safe, and shown not to increase flood risk elsewhere.</i>	1. To avoid giving the impression that a sequential approach applies to all development. It is only required by the NPPF in respect of development areas known to be at risk from flooding now or in the future. 2. To increase effectiveness of policy to ensure it is clear that flooding is from all sources.	Yes – consistent with plan-making policy F2 of the draft NPPF.
Old: SM14	5	Strategic Policy 10: Flooding	Amend Criterion g: <i>g) Comply with the tests and recommendations set out in the Horsham District Strategic Flood Risk Assessments (SFRA) documentation, or Upper Mole Valley SFRA or any future updates.</i>	To clarify the relevant titles of the applicable SFRA documentation.	Yes – consistent with plan-making policy F1 of the draft NPPF.
Old: SM15	5	Strategic Policy 10: Flooding	Amend Criterion i:	To improve the effectiveness of the policy by clarifying that it is	Yes – consistent with plan-

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			<i>i) Make appropriate provision for surface water drainage to ground, water courses or surface water sewer. Development will not be allowed to drain <u>surface water</u> to the foul sewer;</i>	<i>surface water that must not be allowed to drain to the foul sewer to reduce the risk of sewer flooding.</i>	<i>making policy CC1 of the draft NPPF.</i>
Old: SM17	5	Strategic Policy 10: Flooding	Amend First sentence of Criterion 3: New development which incorporates SuDS will be supported where it considers amenity value, green <u>and blue</u> infrastructure, local ecological resources including water quality and biodiversity, natural flood management methods, and contributes towards environmental net gain. An appropriately detailed assessment should be submitted to demonstrate an appropriate SuDS strategy.	Clarification to make clear that blue and green infrastructure should be included, to provide greater certainty and policy effectiveness for applicants and decision makers.	Yes – consistent with decision-making policy F8 of the draft NPPF.
NEW	6	Introduction box	Amend wording of 3rd bullet point: “There are <u>is an</u> Air Quality Management Areas <u>Area</u> in Storrington and Cowfold ”	<i>To reflect the withdrawal of the Cowfold AQMA 24.02.2026</i>	N/A
NEW	6	Para 6.1 (Intro)	Amend wording to: “In Storrington and Cowfold the level of this air pollutant has been high enough to require the designation of <u>an</u> Air Quality Management Areas (AQMA s).	<i>To reflect the withdrawal of the Cowfold AQMA 24.02.2026</i>	N/A
NEW	6	Para 6.11 (SP11)	Amend wording to: “ Two <u>One</u> AQMA s <u>has</u> been declared in the District, in Storrington and Cowfold , <u>both</u> due to the annual mean objective for nitrogen dioxide being exceeded.”	<i>To reflect the withdrawal of the Cowfold AQMA 24.02.2026</i>	N/A
Old HM017	6	Strategic Policy 11: Environmental Protection	Amend wording of criterion 3, 4 and 6 as follows: “3. Maintain <u>and</u> improve the environmental quality of any watercourses, groundwater and drinking water supplies, <p>“6. Minimise <u>Ensure</u> no unacceptable impacts result from air pollution and greenhouse gas emissions in order to protect human health and the natural environment.”</p>	<i>To take strengthened wording so as to be more closely aligned with NPPF.</i>	<i>Yes – consistent with decision-making policy F8 and plan-making policy CC1 of the draft NPPF.</i>

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
Old HM018	6	Strategic Policy 11: Environmental Protection	Amend criterion 4 to read as follows: “..... , particularly with regard to and avoid adverse impacts on and protect the integrity of the South Downs International Dark Sky Reserve designation.”	To ensure wording is sufficiently clear and robust to be effective.	N/A
Old HM020	6	Para 6.14 (SP12)	This document sets out the mechanisms for calculating the additional transport emissions associated with development and the method for determining the estimated monetary value of damage from proposed development caused by pollutants including small <u>fine</u> particulates matter (PM10s <u>PM2.5</u>) and nitrogen oxides (NOx).	Factual clarification	N/A
N/A	6	SP15	QUERY FOR INSPECTOR: The new NPPF enables urban extensions on settlement edges in quite a few circumstances. We nevertheless believe this policy which seeks to prevent settlement coalescence is consistent given overall NPPF steer to protect countryside outside the listed circumstances. We do not propose to significantly amend the policy but have flagged for the Inspector’s consideration.	N/A	N/A
Old: HM021	6	Para 6.32 (SP16)	Amend third and fourth sentences to: “...Applicants will need to be mindful of this should have regard to the need to further the statutory purposes of the National Park in relation to any proposals close to the South Downs National Park boundary and ensure that development within its setting should be sensitively located and designed to avoid or minimise adverse impacts. The Council will have regard to the South Downs National Park Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan, the South Downs View Characterisation Study and any other relevant documents and updates. The Council will also seek to support the National Park’s status as an International Dark Night Skies Reserve in its decision making.”	For clarification and consistency, and to bring into line with update to the National Parks & Access to the Countryside Act 1949 made by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023.	Yes – consistent with decision-making Policy N4 of the draft NPPF.

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
Old: HM022	6	Strategic Policy 16: Protected Landscapes - clause 4	Amend clause 4 of the policy to: “Proposals within land that contributes to the setting of the South Downs National Park should be consistent with National Park purposes and have regard to the South Downs Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan, the <u>South Downs View Characterisation Study</u> and any other relevant document and updates. In particular, proposals should not...”	For clarity and to ensure consistency with supporting text	Yes – consistent with decision-making Policy N4 of the draft NPPF.
Old: HM024	6	Strategic Policy 17: Green Infrastructure and Biodiversity - and supporting text	All references to ‘green infrastructure’ be amended to refer to ‘green <u>and blue</u> infrastructure’ including the policy title.	<i>To clarify that that opportunities to enhance and consider the water environment are reflected</i>	N/A
NEW	6	Para 6.42 (SP17)	Amend the second sentence to: “Development does, however, have potential to create places for biodiversity which applicants are expected <u>encouraged</u> to incorporate <u>when it is not mandated...</u> ”	Notwithstanding HDC’s evidence document EN06 and HDC’s response to the first Inspectors MIQs Matter 4 Issue 2 (questions 4 and 5) the amendment is proposed in order to reflect the national direction of travel for developer biodiversity net gain requirements to be proportionate, and to reflect the draft NPPF. It	Yes – the paragraph with amendment is consistent with plan-making policy N1 and decision-making policies N2 and N3 of the draft NPPF.

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
				also recognises the public authorities' duty to conserve and enhance biodiversity when undertaking their functions, the Environment Act and the Government's Environmental Improvement Plan (EIP).	
NEW	6	Para 6.44 (SP17)	Amend first Sentence to: "In addition to any mitigation / compensation measures required to address any harm caused by development to existing biodiversity, the NPPF expects development to deliver measurable biodiversity net gains (BNGs) <u>contribute positively to the natural environment, support nature's recovery and include features for species which support priority or threatened species including biodiversity net gain where required...</u> "	The amendment is proposed in order to reflect the national direction of travel for developer biodiversity net gain requirements to be proportionate, and to reflect the draft NPPF.	Yes – the paragraph with amendment is consistent with plan-making policy N1 and decision-making policies N2 and N3 of the draft NPPF.
NEW	6	Para 6.48 (SP17)	Amend to: "Evidence prepared to support the preparation of the Local Plan demonstrates that most sites can deliver a minimum 12% net gain in biodiversity on-site, and where this is not possible there is sufficient land with opportunity in the District to deliver any shortfalls off-site. The policy therefore requires the provision of 12% at least 10% biodiversity net gain as part of any 'relevant development' as laid out in Regulations. Applications exempt from the mandatory requirements, including householders, will still be expected to have an overall positive impact on biodiversity <u>contribute positively to the natural environment and support nature's recovery.</u> The mandated	The current NPPF expects development plans to protect and enhance biodiversity. The Natural Environment and Rural Communities Act (as amended by the Environment Act 2021) places a duty on all public authorities in England to "conserve and enhance	Yes - the amendment is consistent with plan-making policy N1 and decision-making policies N2 and N3 of the draft NPPF.

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			Biodiversity Metric (Natural England Joint Publication), or the Small Sites Metric as appropriate, or any subsequent updates, must be used for measuring and accounting for biodiversity losses and gains.”	biodiversity”. A no net loss approach therefore accords with “conserve biodiversity” and consistent with the Environment Act 2021, which seeks to improve the natural environment, and the Government’s Environmental Improvement Plan (EIP) published 1 Dec 2025, which recognises nature protects economic growth and sets out 10 goals including “restored nature” and “access to nature”.	
NEW	6	Para 6.59 (SP17)	Amend the third sentence to: “A greater buffer may be necessary depending on canopy and root spread and potential risks posed by a specific proposal including the impacts upon wildlife networks and hydrology (especially in respect of wet / ghyll woodland where buffers could may be required to extend up to 100m+ in accordance with emerging evidence regarding the importance of this particular habitat)...”	To remove a typo.	N/A
NEW	6	Strategic Policy 17: Green Infrastructure and Biodiversity	Amend criterion 5 to: “5. The Council will support appropriate new development which delivers, at least 12% as a minimum, no net loss in biodiversity and: a) Retains and enhances significant features of nature conservation value on development sites; b) Makes a positive contribution to biodiversity and a Accords with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies, through the creation of appropriate green spaces, that provide linkages between habitats to create local and regional ecological networks that enable the movement of wildlife through development sites;	Notwithstanding HDC’s evidence document EN06 and HDC’s response to the first Inspectors MIQs Matter 4 Issue 2 (questions 4 and 5) the amendment is proposed in order to reflect the national direction of travel for developer biodiversity	Yes – the policy criterion with amendment is consistent with plan-making policies N1 and L1, and decision-

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			<p><u>c) where biodiversity net gains are proposed, appropriate information should be submitted for the consideration of impact, effective use of land and delivery; and for where practicable</u> ed) Following the principle of 'right habitat in the right place', significantly increases woodland or other habitats for the purpose of appropriately enhancing biodiversity, carbon sequestration, pollution control, and / or flood mitigation.</p>	<p>net gain requirements to be proportionate, and to reflect the draft NPPF. The amendment also reflects the proposed deletion of criterion 7, accords with the current NPPF which seeks to protect and enhance biodiversity, the Environment Act and the Government's Environmental Improvement Plan (EIP) published 1 Dec 2025, and helps to future proof the policy for any subsequent change in the national approach. It also acknowledges there is nothing preventing an applicant from providing more than the mandatory minimum BNG requirements.</p>	<p>making policies N2, N3 and L2 of the draft NPPF.</p>
NEW	6	Strategic Policy 17: Green Infrastructure and Biodiversity	<p>Amend the first sentence of criterion 6 to: "6. Relevant development proposals will be expected to deliver 42% <u>at least 10%</u> biodiversity net gain and must submit Biodiversity Net Gain information to show how this will be achieved using the mandated Biodiversity Metric or the Small Sites Metric as appropriate and must abide by the metric trading rules..."</p>	<p>Notwithstanding HDC's evidence document EN06 and HDC's response to the first Inspectors MIQs Matter 4 Issue 2 (questions 4 and 5) the amendment is proposed in order to reflect the national direction of travel</p>	<p>Yes – the policy criterion with amendment is consistent with plan-making policy N1(2) of the draft NPPF.</p>

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
				for developer biodiversity net gain requirements to be proportionate, and to reflect the draft NPPF. It enables flexibility if legislation changes what forms 'relevant development' (as defined in para 6.44).	
NEW	6	Strategic Policy 17: Green Infrastructure and Biodiversity	Delete criterion 7: "7. All other development proposals must seek to demonstrate how measurable biodiversity net gains will be delivered."	To reflect current legislation, the national direction of travel for developer biodiversity net gain requirements to be proportionate, and the draft NPPF.	Yes – the policy with amendment is consistent with plan-making policy N1(2) of the draft NPPF.
Old:HM02 5	6	Strategic Policy 17: Green Infrastructure and Biodiversity	Amend criterion 8 to: "Proposals must give appropriate consideration to protected, <u>priority</u> and notable species. They will be expected to protect <u>populations of protected</u> , priority <u>and notable</u> species and seek to aid their recovery, and must conserve, restore and enhance priority habitats, and should create and manage appropriate new habitats, taking into account <u>pollination and LNRS priorities and measures</u> , where practicable."	To provide clarity over the regard to be given to species.	Yes – the policy criterion with amendment is consistent with decision-making policy N2(1)(f) of the draft NPPF.
Old: SM19	6	Policy 18: Local Green Space	Delete first sentence of policy: Local green and open spaces should be protected. Areas designated as Local Green Space, as identified on the Policies Map, will be safeguarded from development unless...	Clarification to improve the effectiveness of the policy by making clear the policy only relates to Local Green Space (a specific designation) and	Yes, the policy is consistent with plan-making policy

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
				does not protect all open space, which is addressed by other policies.	HC2 of the draft NPPF.
Old: HM027	7	Strategic Policy 19: Development Quality	Amend criterion 8 to: “If located within, or affecting the setting of, the High Weald Area of Outstanding Natural Beauty, proposals for housing should have regard to the High Weald Housing Design Guide.”	To clarify the requirement to consider the setting of the HWNL	N/A
Old: SM23	7	Policy 21: Heritage Assets and Managing Change within the Historic Environment	Amend policy title: Strategic Policy 21: Heritage Assets and Managing Change within the Historic Environment	Correction to reflect that this is a strategic policy as per the policy title.	N/A
Old: SM20, SM21, HM026,	7	Para’s 7.8, 7.9 and 7.10 (SP21)	Amend second sentence of paragraph 7.8 to: Heritage assets may be classified as either ‘designated’ (<u>statutory</u>) or ‘non-designated’ (<u>local</u>) and both are important to consider through the planning process. Amend second sentence of paragraph 7.9 to: <u>Of designated assets, the District is currently home to around 1,500 Listed Buildings, 27 29 Conservation Areas, 178 Archaeological Notice Areas, 29 Scheduled Monuments and a number of Registered Parks and Gardens.</u> Amend first sentence of paragraph 7.10 to:	To make clear that within the District there is both statutory (designated) and local (non-statutory) heritage assets. To provide clarity on classification of heritage assets. Factual update – two Conservation Areas recently designated.	N/A

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<i>Local heritage (non-designated) is recognised through designated Sites of Archaeological Interest, "Locally Listed" buildings as well as similar assets which come to light during the course of development.</i>	<i>To make clear that local heritage is classified as non-designated assets.</i>	
NEW		<i>Strategic Policy 21: Heritage Assets and Managing Change within the Historic Environment</i>	<p>Amend first sentence of criterion 1(f) to: Demonstrate that any proposal in the vicinity <u>within the setting</u> of a heritage asset with, or has the potential to include, archaeological interest is accompanied by appropriate archaeological research, including the investigation, recording and reporting of both above and below ground archaeology.</p> <p>Delete final sentence of criterion 1(f): If necessary, the Council will require assets to be preserved in situ or excavated.</p> <p>Delete criterion 4: 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.</p>	<p>Clearer terminology to align with requirement of revised NPPF.</p> <p>Draft national DM policy covers this issue in more detail.</p> <p>To align with requirements of revised NPPF which has removed reference to 'less than substantial harm'.</p>	<p>Consistent with decision-making policy HE10(1) of the draft NPPF.</p> <p>Consistent with HE10(2) of the draft NPPF.</p> <p>Consistent with decision-making policy HE6 of the draft NPPF.</p>
Old SM27	7	New paragraph (after para 7.13) (Policy 22)	After para 7.14 insert new paragraph numbered 7.15 <u>The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 sets out that the Council may exercise its powers in the control of advertisements in the interest of amenity and public safety. Policy 22 should be applied in that context.</u>	Clarification of legal basis for the policy and the consideration of amenity and public safety.	N/A
Old: HM028 & HM030 (merged)	8	Para 8.5 (SP23)	Amend to: "It will be essential for infrastructure to be provided in a timely way that meets the needs of the new development as it comes forward. Studies to determine whether the proposed development will lead to overloading of existing infrastructure may be required to support	To provide context for requirement for some sites to prepare Phasing and Implementation Strategy.	N/A

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			planning applications. <u>Specific identified requirements are set out in the relevant site allocation policies.</u> It will also be necessary to understand from key infrastructure providers the timing and delivery of any key new upgrades that may be necessary, such as road upgrades or new water treatment facilities, and the level of development that can come forward prior to the completion of these upgrades, as this may impact on the speed at which the new development can come forward. <u>Developers will be required to demonstrate that infrastructure capacity and required upgrades can be delivered in accordance with an agreed phasing scheme for multi-stage developments. Where the need for improved infrastructure is identified, this should be based on up-to-date evidence which demonstrates how improvements are responsive to changing circumstances, and contribute to sustainability objectives, and sustain the high quality of life as part of the "monitor and manage" approach.</u> "	To ensure flexibility and deliverability of required infrastructure in accordance with identified needs.	
NEW	8	Para 8.6 (SP23)	Amend to: "In order to address wastewater treatment capacity, developers are encouraged to contact the water/wastewater infrastructure provider as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint, the Local Planning Authority will, where appropriate, apply phasing <u>Grampian</u> conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."	To ensure conformity / alignment with Water Industry Act setting out water undertakers' requirement to address future water needs.	Yes – consistent with decision-making policy DM3(e) of the draft NPPF.
Old: HM031	8	Strategic Policy 23: Infrastructure Provision	Amend criterion 2 to: "2. Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected. <u>Where distinct development phases are expected, a Phasing and Implementation Strategy will be required at outline, hybrid or full planning application stage, which demonstrates what infrastructure</u>	To ensure infrastructure upgrades will be in place, or secured, to align with the development.	Yes – the policy with amendment is consistent with plan-making policies PM2, PM10, PM11, PM12, PM13,

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<u>enhancements will be delivered, and at what stage in the development.</u> "		S1, S2, CC1, HO2, HO4, E1, TC1, CO1, W1, W2, L1, TR1, TR2, HC1, F2, N1, and decision-making policies DM5, S5, CC3, HO13, E2, E3, W3, W4, M6, L3, DP3, TR3, TR5, HC3, HC4, N2, N3.
Old: HM032	8	8.11 (SP24)	<p>Add new sentence to end of paragraph:</p> <p>For developments that generate significant amounts of movement, interventions should be documented in a Transport Assessment or Statement submitted in support of the application, and a Travel Plan produced to ensure measures are implemented and sustained. These must prioritise active travel, and ensure that all new development is well-connected to wider cycling and walking networks, including appropriate contributions to support off-site improvements. Impacts on the wider strategic road network may also need to be considered. <u>The transport assessment or statement and/or in the Travel Plan must include a monitoring framework and review mechanism to ensure the ongoing effectiveness of measures proposed.</u></p>	Effectiveness: to ensure delivery of proposed mitigation measures.	Yes - consistent with decision-making policy TR6 of the draft NPPF.
Old: HM033	8	8.13 (SP24)	<p>Add text to last sentence before first bullet point:</p>	To clarify the main mechanism for doing so, which is consistent with	Yes – consistent with plan-

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<i>These will be facilitated primarily by the development of strategic sites, and supported as necessary through further developer funding, which will derive in full or in part from the Community Infrastructure Levy:</i> ...	<i>Strategic Policy 23: Infrastructure Provision and supporting para 8.4.</i>	<i>making policy TR1 of the draft NPPF.</i>
Old: HM035	8	8.13 (SP24)	Add a new bullet point to the list of proposed strategic junction improvements: “ <u>Upgrade to Great Daux Roundabout to include traffic signals and additional lanes</u> ”	Evidence update has shown that the improvement is also necessary to mitigate the new Local Plan as well as the existing North Horsham development. Hence reference added for completeness.	Yes – consistent with plan-making policy PM2(2)(f) of the draft NPPF.
Old: HM036	8	8.14 (SP24)	Additional sentence as follows: The Council has worked with partners to produce a Horsham Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out cycling and walking network plans within a 5km radius of Horsham town centre, and a prioritised programme of improvements for future investment. Strategic Policy 24 expects development to have regard to this programme, as well as to any future LCWIPs across the District, together with any relevant government guidance including LTN1/20 – Cycle Infrastructure design, or any future updates. <u>Where the LCWIP networks provide potential links to a development, the applicant should contribute to delivering or improving that part of the network.</u>	For clarification with regards operation of Policy 24 part 2.	Yes – consistent with decision-making policy DP3(1)(e) of the draft NPPF.
Old: HM037	8	Strategic Policy 24: Sustainable Transport	Addition to criterion 1(c) as follows: “ <u>Walking, and cycling and wheeling routes are as appropriate provided or improved both on- and off-site, and designed to be...</u> ”	For clarity. Reference to wheeling added for consistency with other Plan policies/text.	Yes- corresponds to draft NPPF terminology e.g. plan-making policy

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
					TR1(1)(d) and Glossary.
Old: HM038	8	Strategic Policy 24: Sustainable Transport	Amend criterion 1(d) to: “Where feasible, provision is made for bus travel and infrastructure within the development <u>and where appropriate on routes connecting to the development</u> , to include as appropriate...”	To strengthen policy and provide certainty.	Yes – consistent with plan-making policy TR1(1)(d) and decision-making policy TR3(1)(d) of the draft NPPF.
Old: HM041	8	Para 8.20 (Pol 25)	Amend last sentence: <i>Locations within the airport boundary will remain the most sustainable places for airport parking, and in general additional off airport facilities will not be considered acceptable.</i>	<i>To ensure consistency with part 9 of Policy 25: Parking.</i>	N/A
Old: SM28	8	Para 8.26 (Pol 26)	Amend second sentence: <i>The northern and eastern parts of the District, including the whole of Horsham Town, whole of the District lies within the safeguarded area, although it should be noted that the safeguarded area is neither the responsibility nor the proposal of the Council.</i>	<i>Factual update to reflect updated safeguarding zone, which has been extended and now includes the whole of Horsham District.</i>	N/A
Old: HM042	8	Policy 26: Gatwick Airport Safeguarding	Amend criterion 2 to: 2. Minor development within this area, such as changes of use and small-scale building works such as residential extensions, will normally be acceptable. <u>Improvements to existing employment buildings, including small scale extensions and refurbishment, will normally be acceptable provided they will not lead to a significant intensification or increase in the scale of development.</u> Where appropriate, planning permission may be granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area.	Changes made to reflect wording in CBC’s Main Mods local plan required for consistency (GAT2). Rewording agreed with airport and requested by CBC Local Plan inspectors for soundness.	N/A

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
Old: SM29	8	Para 8.45 (Policy 28)	Amend second sentence: <i>The Community Facilities Study 2020 2021 sets the review and recommendations in respect of community rooms and halls...</i>	<i>Correction of factual error to ensure correct date referenced.</i>	N/A
NEW	8	Policy 28: Community Facilities and Uses	Amend the first sentence in criterion 1 to: <i>“1. The provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Open Space, Sport & Recreation Study, the Community Facilities Study, the Playing Pitch and Built Facilities Strategies, the Infrastructure Delivery Plan and other relevant studies or updates and local engagement; and / or contribute to the provision of Green Infrastructure and nature recovery. ...”</i>	<i>To give substantial weight to the benefits of providing new or improved public service infrastructure and encourage new community facilities in line with national policy.</i>	<i>Yes – the policy with amendment is consistent with plan-making policies S1, L1, HC1, and decision-making policies P4, HC3, HC4, HC6, HC7 of the draft NPPF.</i>
Old:HM04 3	8	Policy 28: Community Facilities and Uses	Amend criterion 3.b) to read as follows: <i>“3.b) an assessment has been undertaken which clearly shows any open space to be lost is surplus to requirements and evidence is provided that demonstrates the continued use of the site as a community facility or service is no longer feasible, taking into account factors such as; appropriate active marketing, the demand for a community use within the site or premises, the quality, usability, viability and the identification of a potential future occupier.</i>	To reflect the requirements of paragraph 99 of the NPPF (Sept 2023).	Yes – the policy with amendment is consistent with plan-making policies S1, L1, HC1, and decision-making policies P4, HC3, HC4, HC6, HC7 of

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
					the draft NPPF.
	9	Strategic Policy 29 and supporting text	Policy is out of scope. Any modifications to these policies will be considered at a later date.		
Old:SM31 &SM32	9	Strategic Policy 30: Enhancing Existing Employment	<p>Amend criteria 1 and 2 to:</p> <p>“1. Proposals for the upgrading, and refurbishment and intensification of existing offices, industrial / business estates, premises and sites will be supported provided that:</p> <p>a) they enable the facility to meet modern business standards and demonstrably enhance the attractiveness of the District as a business location;</p> <p>b) they mitigate existing amenity, highway and access <u>appropriately resolve any issues arising from badly sited uses; and</u></p> <p>c) potential new impacts on amenity and on the road network are mitigated <u>any adverse impacts are appropriately addressed.</u></p> <p>2. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses will be supported where it facilitates the retention of existing businesses within the District, and / or protects or creates new jobs, including green industries and social enterprises.”</p>	Correction and clarification in respect of the type of ‘development’ that is covered by criterion 1 versus criterion 2. (Proposed as part of the Council’s response to Matter 7, Issue 1, Question 2b-d)	Yes – consistent with decision-making policy E2, an plan-making policies E1, L1, TR1 of the draft NPPF.
NEW	9	Policy 31: Rural Economic Diversification	<p>Amend criteria 3 and 4 to:</p> <p>“3. Proposals will be supported provided that they:</p> <p>a) Do not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside and the location in question; and</p> <p>b) Demonstrate a net increase in biodiversity in and around the site.</p>	To take into account the national direction of travel to ensure biodiversity net gain requirements are proportionate as reflected in the draft NPPF.	Yes - the policy and amendment align with plan-making policies N1(2), E1 and decision-

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
					making policies S5, E4.
Old:HM04 4	9	Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses	Amend policy title to: <i>Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses</i>	<i>Factual update and for clarification given the policy wording only relates to conversion to residential use and Policy 31 addresses conversion of rural buildings to economic / enterprise uses.</i>	<i>Yes – the policy with amendment is consistent with plan-making policy S5, and decision making policy HO11 of the draft NPPF.</i>
NEW	9	Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses	Amend criterion 6 to: “6. It is demonstrated that the proposal will: a) Enhance the immediate setting through its design and appearance, landscape design and materials; and b) enhance biodiversity in and around the site. ”	To take into account the national direction of travel to ensure biodiversity net gain requirements are proportionate as reflected in the draft NPPF.	Yes – the policy with amendment consistent with plan-making policy S5, and decision making policy HO11 of the draft NPPF.
SM33	9	Para 9.57 (SP36)	Add new sentences at end of paragraph “The policy seeks to promote a concentrated retail function with Primary Frontages balanced with flexibility within the wider Main Shopping Area, as well as protecting the amenity of residents, occupiers and other users. <u>To do this effectively, the policy makes reference to three defined areas:</u> ”	This is in response to MIQs (Matter 7, Issue 2, Question 6) and helps clarify the geographical areas defined in the Policies Map and referred	Yes - NPPF makes reference to Primary Shopping Areas – we

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<ul style="list-style-type: none"> • <u>Town and village centres, which incorporate the geographical area where Town Centre First principles will apply</u> • <u>Main Shopping Areas, a smaller geographical area within town and village centre boundaries where main town centres uses (as defined in the NPPF, and the Glossary of this document) will be favoured, and</u> • <u>Primary Frontages, usually within main shopping areas themselves, although some existing primary frontages do sit just outside, where Class E uses are favoured, but where other uses will be acceptable subject to evidence of marketing of the premises to evidence that the current use is no longer of commercial interest.”</u> 	to in Policies 35 and 36, and how they relate to one another.	have broken this down further into Main Shopping Areas and Primary Frontages and this definition helps to clarify their relationship. NPPF makes clear policies should continue to define these areas locally.
SM34	9	Strategic Policy 36: Town Centre Uses	Amend criterion 4 to: 4. Where units <u>a town centre use within a unit in a Main Shopping Area</u> are is demonstrated to be unviable in their its current form these should be retained <u>applications for other for Class E uses will be supported. in the first instance.</u>	Rewording to make clear this applies to existing non-residential uses in main shopping areas and that Class E uses will be treated favourably.	Yes – consistent with decision-making policy TC2(a) of the draft NPPF.
	10	Strategic Policy 37 and supporting text	Policy is out of scope. Any modifications to this policy will be considered at a later date.		
New suggested mod	10	Para 10.32 (SP38)	Amend para to read:	To take account of up-to-date evidence of need for specific-sized affordable	Yes – consistent with local

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			The Council also recognises that future development should respond appropriately to local character and local needs <u>or other up-to-date evidence</u> . Evidence of local needs will normally be in the form of a local housing needs assessment prepared specifically for that parish or ward, or a Neighbourhood Plan that has successfully passed examination. <u>Regard should be had to evidence provided by local authority housing officers which reflect changes to the District's housing needs.</u>	housing units as provided by the Council's housing officers (which will generally be based on the Housing Register)	context to decision-making policy HO8 of the draft NPPF.
New suggested mod	10	Strategic Policy 38: Meeting Local Housing Needs	Add text to criterion 1 to read: 1. Residential development will be supported where it provides a mix of housing sizes and types to meet the needs of the District's communities as evidenced in the latest Strategic Housing Market Assessment or any subsequent updates in order to create sustainable and balanced communities. Where relevant, a made or referendum stage Neighbourhood Plan may provide an appropriate local mix. Other factors that may be taken into account include <u>evidence provided by local authority Housing Officers</u> , the established character and density of the neighbourhood, the viability of the scheme, and locally and robustly prepared evidence such as a local (parish) housing needs assessment.	To take account of up-to-date evidence of need for specific-sized affordable housing units as provided by the Council's housing officers (which will generally be based on the Housing Register)	Yes – consistent with local context to decision-making policy HO8 of the draft NPPF.
Old: HM049	10	Title above 10.36 (Pol 39)	Title should read: <u>Strategic Policy 39: Affordable Housing</u>	<i>Clarification to reflect status as a strategic policy – as set out on page 139</i>	N/A
New proposed mod	10	Strategic Policy 39: Affordable Housing	Amend criterion 1a-c to: a) On greenfield sites** providing self-contained dwellings (houses and/or flats), a minimum 45% of the total <u>provision of non-specialist C3 homes</u> (gross*);	To clarify that the 45%/10%/35% quota applies to standard C3 housing, to distinguish this from the 30% quota separately applied to specialist housing for older people.	N/A

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<p>b) On previously developed (brownfield) sites self-contained dwellings (houses and/or flats), a minimum 10% of the total <u>provision of non-specialist C3 homes</u> (gross*);</p> <p>c) On strategic sites***, a minimum 35% of the total <u>provision of non-specialist C3 homes</u> (gross*) except for Land West of Ifield where a minimum 40% of the total (gross*) will apply;</p>		
Old: SM43	10	Strategic Policy 39: Affordable Housing	<p>Amend criterion 1d to read:</p> <p>d) On sites providing continuing care retirement housing, retirement housing and other specialist care housing (<u>except for extra-care housing</u>), a minimum 30% of the total (gross*) as applies in accordance with Policy 42;</p>	To reflect updated evidence that affordable housing cannot be viably provided on extra-care housing.	N/A
Old: SM44	10	Policy 42: Retirement Housing and Specialist Care	<p>Amend criteria 1b(i) and (ii):</p> <p>i. For the retirement homes and extra-care housing element, the proposal will provide C3 self-contained affordable homes suited to specialist older people's needs; and</p> <p>ii. For elements of the proposal delivering self-contained units as part of a residential care scheme (C2 use class) <u>except any element classed as extra-care housing</u>, the proposal will provide specialist on-site affordable housing tailored for occupation by C2 residents; and</p>	To reflect updated evidence that affordable housing cannot be viably provided on extra-care housing.	N/A
Substantially new (elements of SM45)	10	Para 10.63 (SP43)	<p>Delete paragraph 10.63 in its entirety and replace with the following:</p> <p><i>“The main planning policy document relating to GTTS is the Government’s ‘Planning Policy for Traveller Sites’ document (PPTS). The PPTS document provides a definition of both ‘Gypsies and Travellers’ and ‘Travelling Showpeople’ for the purposes of planning policy, which this policy reflects.”</i></p>	To ensure that the correct definitions are used when applying the policy.	Yes – the definitions from the PPTS have been carried into the draft NPPF.
SM46 (with tweaks)	10	Para 10.65 (SP43)	<p>Amend first sentence:</p> <p><i>In total, a need for 77 79 pitches for Gypsy & Traveller households in Horsham District has been identified over the period 2023-2040 for</i></p>	Factual updates to reflect the updated planning policy definition and	Yes –reflects updated definition that

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF															
			those meeting the PPTS definition, and for which it will be necessary to identify land in the Local Plan to meet this need.	provide accurate figures that relate to our evidence base.	is carried into the draft NPPF.															
SM47	10	Para 10.65, Table 10 (SP43)	<p>Amend table 10:</p> <p><u>Table 10: Gypsy & Traveller Need requirements for those that met the Planning Definition by Year periods</u></p> <table border="1"> <thead> <tr> <th>Years</th> <th>1-5 2023-28</th> <th>6-10 2028-33</th> <th>11-15 2033-38</th> <th>16-17 2038-40</th> </tr> </thead> <tbody> <tr> <td></td> <td>48</td> <td>10</td> <td>12</td> <td>7</td> </tr> <tr> <td></td> <td>50</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Years	1-5 2023-28	6-10 2028-33	11-15 2033-38	16-17 2038-40		48	10	12	7		50				Factual update to reflect need position following GTAA Update (H06)	Yes –reflects updated definition that is carried into the draft NPPF.
Years	1-5 2023-28	6-10 2028-33	11-15 2033-38	16-17 2038-40																
	48	10	12	7																
	50																			
Edited version of SM48	10	Paragraph 10.68 (SP43)	The Gypsy & Traveller and Travelling Showpeople Needs Accommodation Assessment Targeted Update identifies identified a need for 34 29 additional pitches for households that does did not meet the revised planning definition for Gypsies and Travellers. planning definition.	Factual update to reflect need position following GTAA Targeted Update (H06)	Yes –reflects updated definition that is carried into the draft NPPF.															
Edited version of SM49	10	New paragraph (SP43)	<p>After paragraph 10.65 / Table 10 insert:</p> <p><u>The Gypsy & Traveller Accommodation Assessment Targeted Update identifies the potential need for permanent pitches and plots as follows:</u></p> <ul style="list-style-type: none"> • <u>50 additional permanent residential gypsy and traveller pitches (for those who meet the planning definition) in years 1-5 (2023-2028)</u> • <u>10 additional permanent residential gypsy and traveller pitches (for those who meet the planning definition) in years 6-10 (2028-2033)</u> 	Factual update to reflect need position following GTAA Targeted Update (H06)	Yes –reflects updated definition that is carried into the draft NPPF.															

Historic ref. (to be re-coded)	Chapter	Paragraph / Policy Number	Suggested Change (or out of scope)	Reason	Is it consistent with the draft NPPF
			<ul style="list-style-type: none"> 12 additional permanent residential gypsy and traveller pitches (for those who meet the planning definition) in years 11-15 (2033-2038) 7 additional permanent residential gypsy and traveller pitches (for those who meet the planning definition) in years 16-17 (2038-2040) 1 additional plot for travelling showpeople <p>Consequential update to paragraph numbering in rest of chapter</p>		
	10	All housing allocation policies (including strategic sites)	Policies are out of scope. Any modifications to these policies will be considered at a later date.		
	10	Figures 7, 8 and 9	These diagrams are illustrative masterplans for three strategic sites proposed for allocation. Any modifications to these are out of scope and will be considered at a later date.		
		List of Figures	The List of Figures is out of scope. Any modifications made to these will be consequential to other changes and will be considered at a later date.		
		List of Tables	The List of Tables is out of scope. Any modifications made to these will be consequential to other changes and will be considered at a later date.		
		Glossary	The Glossary is out of scope. Any modifications made to these will be consequential to other changes and will be considered at a later date.		
N/A	N/A	N/A	Add Appendix 1 – Schedule of Saved Policies	For completeness	N/A

Appendix 1 – Proposed policy text for insertion as a new Appendix 1 of the Plan

Horsham District Planning Framework 2015 Policies	Replaced by the HDLP ('not saved') or retained ('saved')	New Policy Numbers
Policy 1 – Sustainable Development	Not saved	Strategic Policy 1: Sustainable Development
Policy 2 – Strategic Development	Not saved	No like-for-like replacement as subsumed into various other policies.
Policy 3- Development Hierarchy	Not saved	Strategic Policy 2 – Development Hierarchy
Policy 4 – Settlement Expansion	Not saved	Strategic Policy 3 – Settlement Expansion
Policy 5 – Horsham Town	Not saved	Strategic Policy 4 – Horsham Town
Policy 6 – Broadridge Health Quadrant	Not saved	Strategic Policy 5 – Broadridge Health Quadrant
Policy 7 – Economic Growth	Not saved	Strategic Policy 29 – Enhancing Existing Employment
Policy 8 - University Quarter Mixed Use Development	Not saved	No like-for-like replacement – university not come forward.
Policy 9- Employment Development	Not saved	Strategic Policy 30 – Enhancing Existing Employment
Policy 10 - Rural Economic Development	Not saved	Policy 31 – Rural Economic Development
Policy 11 -Tourism and Cultural Facilities	Not saved	Strategic Policy 34: Tourism Facilities and Visitor Accommodation
Policy 12- Vitality and Viability of Existing Retail Centres	Not saved	Strategic Policy 35 – Town Centre Hierarchy and Sequential Approach
Policy 13: Town Centre Uses	Not saved	Strategic Policy 36 – Town Centre Uses
Policy 14 - Shop Fronts and Advertisements	Not saved	Policy 22 – Shop Fronts and Advertisements

Horsham District Planning Framework 2015 Policies	Replaced by the HDLP ('not saved') or retained ('saved')	New Policy Numbers
Policy 15 – Housing Provision	Not saved	Strategic Policy 37: Housing Provision
Policy 16 - Meeting Local Housing Needs	Not saved	Strategic Policy 38 – Meeting Local Housing Needs
Policy 17 - Exceptions Housing Schemes	Not saved	Policy 41 – Rural Exception Homes
Policy 18 - Retirement Housing and Specialist Care	Not saved	Policy 42: Retirement Housing and Specialist Care
Policy 19 - Park Homes and Residential Caravan Sites	Not saved	No like-for-like replacement – covered by other policies including rural exception homes
Policy 20 - Rural Workers Accommodation	Not saved	Policy 44: Rural Workers Accommodation
Policy SD1 – Land North of Horsham	Saved	n/a
Policy SD2 – Employment and Business Opportunities	Saved	n/a
Policy SD3 – Local Centre	Saved	n/a
Policy SD4 – Housing Needs	Saved	n/a
Policy SD5- Open Space, Sport and Recreation	Saved	n/a
Policy SD6 - Landscape Buffer, Landscape Character, Biodiversity and Green Infrastructure	Saved	n/a
Policy SD7 - Design	Saved	n/a
Policy SD8 - Education	Saved	n/a
Policy SD9 – Transport Infrastructure	Saved	n/a

Horsham District Planning Framework 2015 Policies	Replaced by the HDLP ('not saved') or retained ('saved')	New Policy Numbers
Policy SD10 - Southwater Strategic site	Not saved	No like-for-like replacement: Development Permitted
Policy 11 - Land South of Billingshurst	Not saved	No like-for-like replacement: Development Permitted
Policy 21 - Gypsy and Traveller Allocations	Not saved	Strategic Policy 43: Gypsies and Travellers
Policy 22 - Gypsy and Traveller Sites	Not saved	Strategic Policy 43: Gypsies and Travellers
Policy 23 - Gypsy and Traveller Site Accommodation	Not saved	Strategic Policy 43: Gypsies and Travellers
Policy 24 – Environmental Protection	Not saved	Strategic Policy 11 – Environmental Protection
Policy 25 - District Character and the Natural Environment	Not saved	Strategic Policy 13 – The Natural Environment and Landscape Character
Policy 26 - Countryside Protection	Not saved	Strategic Policy 14 – Countryside Protection
Policy 27 - Settlement Coalescence	Not saved	Strategic Policy 15 – Settlement Coalescence
Policy 28 - Replacement Dwellings and House Extensions in the Countryside	Not saved	Policy 45 - Replacement Dwellings and House Extensions in the Countryside
Policy 29 - Equestrian Development	Not saved	Policy 33 - Equestrian Development
Policy 30 - Protected Landscapes	Not saved	Strategic Policy 16: Protected Landscapes
Policy 31 - Green Infrastructure and Biodiversity	Not saved	Strategic Policy 17- Green Infrastructure and Biodiversity
Policy 32- The Quality of New Development	Not saved	Strategic Policy 19 – Development Quality

Horsham District Planning Framework 2015 Policies	Replaced by the HDLP ('not saved') or retained ('saved')	New Policy Numbers
Policy 33- Development Principles	Not saved	Strategic Policy 20 - Development Principles
Policy 34 - Heritage Assets and Managing Change within the Historic Environment	Not saved	Policy 21 - Heritage Assets and Managing Change within the Historic Environment
Policy 35 - Climate Change	Not saved	Strategic Policy 6: Climate Change
Policy 36- Appropriate Energy Use	Not saved	Strategic Policy 7: Appropriate Energy Use
Policy 37 – Sustainable Design and Construction	Not saved	Strategic Policy 8: Sustainable Design and Construction
Policy 38 - Flooding	Not saved	Strategic Policy 9: Flooding
Policy 39 – Infrastructure Provision	Not saved	Strategic Policy 23: Infrastructure Provision
Policy 40 – Sustainable Transport	Not saved	Strategic Policy 24: Sustainable Transport
Policy 41 - Parking	Not saved	Policy 25: Parking
Policy 42 – Inclusive Communities	Not saved	Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Policy 43 - Community Facilities, Leisure and Recreation	Not saved	Policy 28: Community Facilities, Leisure and Recreation