



Position Statements

(1) Delivering Sustainable Development

(2) Infrastructure

November 2025

Position Statements - Background

- Current District Plan position has a number of implications:
 - Can no longer demonstrate a 5-year housing land supply
 - Tilted balance therefore applies
 - Only minimal weight to emerging policies and allocations in the submitted draft plan
- **Preparing two Position Statements:**
 - **Delivering Sustainable Development**
 - **Infrastructure**
- Same approach taken by Horsham and Chichester, amongst others
- Voluntary – no statutory requirement so no guidance or policy– content and process is in the Council’s gift
- **They sit outside the statutory policy framework for decision making**

Position Statements - Purpose

Key purpose:

To provide developers and other stakeholders guidance on how the Council will consider planning applications, and to provide a steer for Planning Committees

- Planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise
- The development plan remains the starting point for determining applications – the Position Statements don't change this
- The most weight will therefore be applied to the adopted District Plan, Site Allocations DPD and Neighbourhood Plans
- The Position Statements will be a material consideration, therefore carry some weight

Position Statements - Purpose

Position Statements **CAN**

- Set out a range of sites and principles the Council supports – compliance is optional
- Provide a steer for Planning Committees
- Provide some certainty – e.g. sites that are likely to be supported and principles we would like to see adhered to
- Use language such as “expected to...”, “encouraged to...” and “should...”

Position Statements **CANNOT**

- Replace or supersede policies in the adopted District Plan
- Be given the same weight as a Local Plan
- Be used to set planning policy – they are guidance only
- Be used to refuse planning applications if they don’t fully comply
- Use language such as “must...” and “required to...”

Engagement

- The content in the Position Statements provides guidance **NOT** Policy
- Compliance is optional
- It is therefore essential to ensure:
 - Developers are largely supportive of content
 - We do not ask for anything undeliverable or unviable
- Draft Position Statements were shared with the Developers Liaison Group for comments
 - Developers supported the principle and positive approach.
 - Comments were largely technical and seeking additional clarity, which have now been addressed.
 - Some developers without a site in the draft Plan objected that their site wasn't included in the Position Statement.

Position Statement 1: Delivering Sustainable Development



Delivering Sustainable Development

The Council's overarching strategy for delivering sustainable development is:

- Continue to support sites that have been allocated for housing
- Give support to sites proposed for allocation in the draft District Plan
- For non-allocated (speculative) sites, will positively consider:
 - development that aligns with the vision and objectives of the adopted District Plan; and
 - development that accords with the settlement hierarchy set out in the adopted District Plan; and
 - development that demonstrably meets local housing need
 - development that is in general conformity with the most up-to-date evidence base

Location of Development - Sites

- The proposed sites in the draft District Plan were allocated following a robust site selection process and testing through the evidence base
- The Council is satisfied they represented the most sustainable locations for development
- These sites are still supported and should be encouraged to progress to:
 - Boost overall housing supply and contribute towards meeting housing need
 - Contribute towards the five-year housing land supply
- Position Statement lists these sites as “Preferred Sites”
- Additional guidance is provided re development at Sayers Common
- **Appendix C** of the Position Statements sets out guidance for each site, including expected infrastructure
- The Position Statement does not preclude development on non-allocated/non-preferred sites

Decision Making Principles

- Eight “Decision Making Principles” which reflect the chapters of the draft District Plan
- For each - an overarching objective, signposting to adopted policies and evidence, and Principles
- Principles are important and provide a guide to developers but go beyond existing policy and are therefore “nice to have” – have little weight and require co-operation from the developer
 - **Principle 1:** Sustainability
 - **Principle 2:** Natural Environment and Green Infrastructure
 - **Principle 3:** Countryside
 - **Principle 4:** Built Environment
 - **Principle 5:** Transport
 - **Principle 6:** Economy
 - **Principle 7:** Housing
 - **Principle 8:** Infrastructure

Principle 1 - Sustainability

To ensure development takes an integrated and holistic approach to addressing the causes of climate change and to increase resilience to the effects of climate change by including mitigation and adaptation measures, and to ensure development enables and supports healthy lifestyles and addresses health and wellbeing needs.

Principles:

- Integrate measures to reduce carbon and other greenhouse gases in its design and construction
- Designed to minimise vulnerability from the effects of climate change
- Reduce overall flood risk, and reflect national standards for surface water drainage
- Facilitate healthy lifestyles and inclusive and safe places

Principle 2 – Natural Environment and Green Infrastructure

To ensure development protects and takes opportunities to enhance biodiversity, ecological networks and green and blue infrastructure, and contributes to nature recovery, as well as preventing pollution or hazards.

Principles:

- Protect, conserve and enhance biodiversity
- Deliver Biodiversity Net Gain in line with legislation, with a preference for off-site BNG to be provided locally
- Encourage 20% BNG on Significant Sites (those over 1,000 dwellings) – 10% is the legal minimum
- Encouraged to incorporate biodiversity features such as swift boxes/bricks, bat boxes, bee bricks, etc
- Incorporate existing on-site and off-site green and blue infrastructure into the development design

Principle 3 - Countryside

To ensure development recognises the quality of the rural and landscape character of the district and responds appropriately to protected landscapes and protected nature conservation sites.

Principles:

- Refers to the Countryside and Rights of Way Act 2000 statutory duty to conserve and enhance the natural beauty of land in an AONB (National Landscape)

Principle 4 – Built Environment

To promote sustainable development that adapts to the effects of climate change, whilst maintaining settlement identity and character, and protecting the built and historic environment.

Principles:

- Development should respond to its context, be inclusive and prioritise sustainability
- Should demonstrate how the scheme will deliver high quality active/sustainable travel connections
- Maximise opportunities to retain existing trees and incorporate new trees
- Should provide a Heritage Impact Assessment

Principle 5 - Transport

To ensure that all development provides the appropriate infrastructure required to support the vision and objectives of the West Sussex Transport Plan 2022-2036, including development which embodies liveable communities, sustainable and active travel principles and delivers attractive, well-planned places, which are designed to be inclusive, safe and equitable for all users.

Principles:

- Use a vision led approach to identifying solutions, in accordance with national policy and West Sussex Transport Plan 2022-2036
- Should be designed to prioritise sustainable and active modes of travel
- EV charging facilities should be provided in accordance with WSCC guidance
- Council supports provision of car clubs and provision of car club parking spaces

Principle 6 - Economy

To ensure development achieves sustainable economic growth, protects and enhances the vitality and viability of the district's town and village centres in accordance with the hierarchy, and recognises the importance of protecting and supporting the rural and tourism economy within the district.

Principles:

- Resists the loss of employment floorspace and loss of town centre uses in town centres – should provide evidence that the site/unit is no longer needed
- Sets out the retail hierarchy as per the most up-to-date evidence
- Gives support to amalgamation/sub-division of units and 'meanwhile' uses

Principle 7 - Housing

To ensure development delivers the type and mix of accommodation that meets the different housing needs of the local community in order to help support and create sustainable and inclusive communities.

Principles:

- Reflects update national policy which requires affordable housing on sites of 10+ units (current District Plan policy is 11+ units)
- Signposts updated evidence regarding housing mix – the Strategic Housing Market Assessment
- Provision of Permanent Gypsy and Traveller pitches should be made on Significant Sites (1,000+ dwellings)

Principle 8 - Infrastructure

To ensure all development is supported by the delivery and maintenance of infrastructure to cater for the needs arising from proposals and to effectively mitigate any impacts of the development on existing infrastructure in the community and surrounding area.

Principles:

- Should support provision of infrastructure with reference to the Council's most recently published Infrastructure Delivery Plan (IDP) and Infrastructure Position Statement
- Infrastructure Delivery Strategy should be prepared by Significant Sites (1,000+ dwellings)
- Encourage dialogue between service providers and developers and take opportunities to co-locate services/jointly deliver infrastructure
- Viability Appraisals should be prepared where an application is not policy compliant, carried out in accordance with up-to-date RICS guidance

Position Statement 2: Infrastructure



Infrastructure

- Development Infrastructure and Contributions SPD was adopted in 2018
 - Included formulae and costings for developer contributions (Note: not WSCC or NHS)
 - This was due to be replaced by “Appendix 5” of the District Plan upon its adoption – this included updated formula meaning higher financial contributions from developers
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- Development Infrastructure and Contributions SPD was revoked in July 2025
 - Council has been relying on the “Appendix 5” figures
 - These figures have now been transposed into **Position Statement 2: Infrastructure**
 - Once adopted by Council, the Infrastructure Position Statement will be a material consideration and carry weight

Next Steps

- **Scrutiny Committee for Place and Environment:** 26th November 2025
 - **Council:** 10th December 2025
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- Upon adoption the Position Statements will carry some weight in decision making
 - Guidance will be provided to show how the position statements should be used in decision making alongside the statutory planning framework
 - The Position Statements will remain in force until a new District Plan is adopted

