

Position Statement of Horsham District Council

Agenda Item 3

GENERAL CONFORMITY WITH HORSHAM DISTRICT PLANNING FRAMEWORK (HDPF) STRATEGIC POLICIES

Consideration of the Neighbourhood Plan's general conformity with HDPF Strategic Policies 2, 3, 4 and 15 in light of representations submitted by Gladman Developments Ltd., (Ref. No. 27), Boyer (on behalf of Wates Developments Ltd.) (Ref. No. 31), LRM Planning (on behalf of W.T. Lamb Holdings Ltd.) (Ref. No. 36), Berkeley Strategic Land Ltd. (Ref. No. 38), Parker Dann (Ref. No. 42) and Horsham District Council (Ref. No. 44).

In particular, I shall wish to discuss in detail the quantum of proposed residential development in the Neighbourhood Plan area during the Plan period (2019-2031) as set out in Section 4 of the Plan in relation to the adopted HDPF policies and the emerging Horsham Local Plan Review, and with reference to Policy SNP2 (Allocation for Residential Development).

KEY DOCUMENTS for cross-reference:

1. National Planning Policy Framework (2012)
2. Planning Practice Guidance (2020)
3. Horsham District Planning Framework (2015)
4. Report on the examination into Horsham District Planning Framework (2015)
5. Southwater Neighbourhood Development Plan (2019-2031) Submission Version (2019)
6. Housing Need Study, AECOM, 2018
7. Regulation 18 consultation version of the Horsham Local Plan Review (2020)

Representations submitted by:

- Gladman Developments Ltd. (Ref. No. 27)
- Boyer (on behalf of Wates Developments Ltd.) (Ref. No. 31)
- LRM Planning (on behalf of W.T. Lamb Holdings Ltd.) (Ref. No. 36)
- Berkeley Strategic Land Ltd. (Ref. No. 38)
- Parker Dann (Ref. No. 42)
- Horsham District Council (Ref. No. 44).

Introduction

- 3.1 This Position Statement has been prepared by Horsham District Council on the general conformity of the Southwater Neighbourhood Development Plan (SNDP) with the strategic policies of the Horsham District Planning Framework (HDPF). This Position Statement will explore this general conformity in more detail and then address the concerns raised in various representation focusing on the number of proposed new homes in the parish.

General Conformity

- 3.2 The starting point for the preparation of the SNDP is the Horsham District Planning Framework (HDPF), which is the adopted Local Plan for the District. The plan period runs to 2031.
- 3.3 Criterion 5 of the HDPF Policy 2 (Strategic Policy -Strategic Development supports in principle the sustainable development of settlements such as Southwater through an appropriate scale of development, which retains the existing settlement pattern over the plan period. The settlement pattern for the District is set out in Strategic Policy 3: Development Hierarchy. Southwater is identified as a 'small town or larger village' in the second tier of the development hierarchy. Strategic Policy 4: Settlement Expansion supports the development of settlements across the District in order to meet identified local housing, employment and community needs. Strategic Policy 15: Housing Provision identifies an annual housing target for the District of 800 homes each year of which at least 1,500 should be identified in neighbourhood plans across the District. There is no specific provision in the policy for each parish.
- 3.4 Southwater Parish Council commissioned an independent report from AECOM to establish the housing need of the parish (Ref 6). The methodology for the assessment was in line with guidance as set by Planning Practice Guidance ¹ and was supported by Locality. The assessment confirmed that at least 422 new homes should come forward during the Neighbourhood Plan period (2019 to 2031). Policy SNP2 of the SNDP allocates land for between 422 and 450 new homes. This is 28% of the total neighbourhood plan requirement identified in the HPDF. Given the position of Southwater in our settlement hierarchy, (Policy 2 & 3) the District Council considers that this is an appropriate and important proportion of the 1,500 new homes required from neighbourhood plans under Strategic Policy 4. The housing number in the SNDP is in general conformity with the adopted strategic policies of the HDPF.

Horsham District Local Plan Review

- 3.5 The District Council is preparing a Local Plan Review, which will run from 2019 to 2036. The new Plan will set out how the Authority will meet the additional housing requirements which arise from the standard housing methodology and any Duty to Co-operate requirements. The locational strategy to meet these housing numbers is a strategic matter and will be addressed in the Local Plan Review. It will take account of the Council's revised evidence base and Sustainability Appraisal process. The Council is consulting on a Regulation 18 version of the Plan between 17 February and 30 March 2020. The proposals for meeting housing requirements are set out in Chapter six of the consultation document. The SDNP pre-dates the documentation published

¹ Paragraph: 105 Reference ID: 41-105-20190509
Revision date: 09 05 2019

by Horsham District Council. We would like to stress that the District Council has worked closely with the parish throughout the SNDP preparation process and has shared information and evidence on the Local Plan when this has become available.

- 3.6 The Horsham District Local Plan Regulation 18 document has limited weight and has a number of stages to progress through before the plan can be adopted. Thus, even having regard to the housing need arising from the standard methodology which is the basis for the Local Plan Review and the strategy proposed by the Local Plan Review to meet that need, at this time Southwater Parish Council cannot plan beyond the current adopted plan requirements set out in the HDPF. Subject to the outcome of Local Plan Review process any additional needs for the Parish will need to be met in the Council's Local Plan or as part of a review of the Southwater Neighbourhood Plan.

Representations

- 3.7 The representation from Gladman Developments Ltd (Ref. No. 27) raises concerns that there is insufficient flexibility between the adopted and emerging strategic policies of the District Council and the policies of the SNDP. The District Council fully understand the need to have an up to date development plan in place. As set out in para 3.6 above the outcome of the Local Plan Review is not yet known. Any additional needs for the Parish will need to be met in the Council's Local Plan or as part of a review of the Southwater Neighbourhood Plan following the adoption of a new Local Plan for the Council.
- 3.8 The representations made by Wates Developments Ltd (Ref. No. 31) and W.T. Lamb Holdings Ltd raise concerns that the Parish Council should have used the standard methodology for assessing the housing need for the Parish. It is therefore considered that it is appropriate for the Southwater Neighbourhood Plan to have been prepared on the basis of the current adopted planning framework (ie 800pa and meeting a proportion of 1500 homes through neighbourhood planning) against which it must be in general conformity to meet the basic conditions.
- 3.9 In addition to the points raised in para 3.6, it should also be noted that Horsham District Council has timetable for Local Plan preparation, with the publication of a Regulation 19 document in the Autumn of 2020. This is available to view on the Council's website: <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-timetable>
- 3.10 The representation made by Berkeley Strategic Land Ltd. (Ref. No. 38) welcomes the identification of 422-450 homes in Policy SNP2 of the SNDP. It suggests that the range of 422 to 450 homes should be amended so that the top of the range is not seen as a cap. The District Council considers that the range set out in the Policy is positively prepared and provides certainty on the number of new homes to be provided. The representation also asks for an amendment to the Policy to prevent the allocation prejudicing potential comprehensive longer-term development. This requirement is already a requirement in the HPDF (Criterion 4 of policy 4) and the District Council would be content with a further reference in the policy to make this point explicit as follows: *'The development of Land West of Southwater should not prejudice the further development of the village should further sites be allocated through the Local Plan Review.'*
- 3.11 The representation made by Parker Dann questions if the local community has been sufficiently engaged in the preparation of the neighbourhood plan and the selection of one large site rather than several smaller sites to meet housing need. Paragraph 4.11 of the Plan sets out the reasons for the allocation of this site and the Plan has been

subject to two rounds of public consultation on the matter, the details of which are set out in the Consultation Statement. Furthermore, the SEA has tested this spatial approach, which has found it to be a sustainable strategy for Southwater as this will consolidate development close to Lintot Square, to help it continue to play a key role as community hub.

Conclusion

- 3.12 The District Council considers that the SNDP meets the basic conditions and is in general conformity with the strategic policies of the adopted HDPF. The proposed quantum of housing will make an important contribution to meeting the housing required from neighbourhood plans across the District. The evidence base supporting the allocation has been prepared in line with Government guidance on neighbourhood plan. The District Council would support an amendment to the plan to clarify our existing policy position that no development should prejudice long term development in the District. Proposed amendment:

'The development of Land West of Southwater should not prejudice the further development of the village should further sites be allocated through the Local Plan Review'.

Position Statement of Horsham District Council

Agenda Item 4

POLICY SNP1 (b) – BUILT UP AREA BOUNDARIES

I shall wish to discuss the methodology and justification for the Built Up Area Boundaries Review, with reference to the Built-Up Area Review (February 2019) supporting document, in light of representations submitted by Savills (on behalf of Christ's Hospital Foundation) (Ref. No. 5), Batcheller Monkhouse (on behalf of Mr. Peter Westergaard) (Ref. No. 7), Gladman Developments Ltd. (Ref. No. 27), Berkeley Strategic Land Ltd. (Ref. No. 38) and Horsham District Council (Ref. No. 44).

KEY DOCUMENTS for cross-reference:

1. National Planning Policy Framework (2012)
2. Planning Practice Guidance (2020)
3. Horsham District Planning Framework (2015)
4. Report on the examination into Horsham District Planning Framework (2015)
5. Southwater Neighbourhood Development Plan (2019-2031) Submission Version
6. Housing Need Study, AECOM, 2018
7. Regulation 18 consultation version of the Horsham Local Plan Review (2020)
8. Built Up Area Review, Southwater Parish Council (2019)
9. Issues and Options – Employment, Tourism and Sustainable Rural Development, Horsham District Council (2018)

Representations submitted by:

- Savills (on behalf of Christ's Hospital Foundation) (Ref. No. 5)
- Batcheller Monkhouse (on behalf of Mr. Peter Westergaard) (Ref. No. 7),
- Gladman Developments Ltd. (Ref. No. 27)
- Berkeley Strategic Land Ltd. (Ref. No. 38)
- Horsham District Council (Ref. No. 44).

Introduction

- 4.1 This Position Statement has been prepared by Horsham District Council (HDC) on the methodology and justification for the Built Up Area Boundaries (BUAB) in the Southwater Neighbourhood Development Plan (SNDP). The District Council considers designation of settlement boundaries is a strategic matter for the Local Plan Review.

Strategic objection

- 4.2 Paragraph 21 of the National Planning Policy Framework (NPPF) requires plans to specify which policies are strategic, and this is done in the Horsham District Planning Framework (HDPF). The paragraph then goes on to say that strategic policies should address the strategic priorities for the area. The District Council considers that the BUAB is a strategic tool for policy planners to prevent urban sprawl and ribbon development and that it guides sustainable development to the right places. Those areas included within the BUAB must conform to relevant local and national policy to ensure the most appropriate use of land. Outside the boundary only uses appropriate to a countryside location are acceptable. Strategic Policy 4 of the HDPF deals with settlement expansion and sets out the context by which settlements can expand but does not allude to boundary changes.
- 4.3 There are a total of 24 neighbourhood development plans (NDP) in various stages of preparation across Horsham District, which are supported by the District Council. If every qualifying body were to undertake a boundary reviews through an NDP it would create inconsistencies and result in piecemeal development across the District. This would be impractical and lead to confusion especially with regards to appeals and public inquiries. Therefore, the District Council objects to any BUAB being set by a qualifying body including Southwater.
- 4.4 Horsham District Council published its methodology for the review of Built-up Area boundaries in the Issues and Options – Employment, Tourism and Sustainable Rural Development document published by the District Council in 2018. The same methodology has been used applied when considering comments and feedback to this consultation and has fed into the Horsham District Regulation 18 consultation document which has now been published for consultation and on which the Parish Council are invited to provide their feedback.
- 4.5 Although the Parish Council indicate that their review of the Southwater built-up area boundary follows the methodology published by Horsham District Council, the outcomes of the review do in a number of instances directly conflict with our own conclusions. Furthermore, we are aware that, although they sought further clarification on one matter, the Parish Council did not object to the District Council's Built-up area boundary proposals in their response to our 2018 Issues and Options – Employment, Tourism and Sustainable Rural Development consultation. Subsequent to this support a different approach has now been set out in the draft neighbourhood plan.
- 4.6 This provides evidence that consistent interpretation of our guidance is likely to be problematic. In the longer term such could prejudice growth proposed by the Local plan and thus prejudice the government's housing agenda to positively plan for the District. In any event, it should be noted that the BUAB for Southwater will be superseded by the BUAB set for the village in the Local Plan Review, although it is recognised that any final boundary will be subject to any conclusions reached by an Independent planning inspector.

Conclusion

- 4.7 The District Council objects to the built-up area boundaries proposed by the Parish Council settlement boundary. This conflicts with Strategic Policy 4 of the HDPF and therefore fails the basic condition of not being in general conformity with the strategic policies of the development plan.

Position Statement of Horsham District Council

Agenda Item 5

POLICY SNP2 – ALLOCATION FOR RESIDENTIAL DEVELOPMENT

I shall wish to discuss the detailed policy criteria set out within Policy SNP2, with reference to the Proposed Housing Allocation West of Southwater (March 2019) supporting document and the Sustainability Appraisal/Strategic Environmental Assessment (March 2019), in light of representations submitted by Batcheller Monkhouse (on behalf of Mr. Peter Westergaard) (Ref. No. 7), Thakeham Homes Ltd. (Ref. No. 18), Gladman Developments Ltd (Ref. No. 27), Boyer (on behalf of Wates Developments Ltd.) (Ref. No. 31), LRM Planning (on behalf of W.T. Lamb Holdings Ltd.) (Ref. No. 36), Berkeley Strategic Land Ltd. (Ref. No. 38), Parker Dann (Ref. No. 42) and Horsham District Council (Ref. No. 44).

KEY DOCUMENTS for cross-reference:

1. National Planning Policy Framework (2012)
2. Planning Practice Guidance (2020)
3. Horsham District Planning Framework (2015)
4. Report on the examination into Horsham District Planning Framework (2015)
5. Southwater Neighbourhood Development Plan (2019-2031) Submission Version (2019)
6. Housing Need Study, AECOM, 2018
7. Regulation 18 consultation version of the Horsham Local Plan Review (2020)

Representations submitted by:

- Batcheller Monkhouse (on behalf of Mr. Peter Westergaard) (Ref. No. 7)
- Thakeham Homes Ltd. (Ref. No. 18)
- Gladman Developments Ltd (Ref. No. 27)
- Boyer (on behalf of Wates Developments Ltd.) (Ref. No. 31)
- LRM Planning (on behalf of W.T. Lamb Holdings Ltd.) (Ref. No. 36)
- Berkeley Strategic Land Ltd. (Ref. No. 38)
- Parker Dann (Ref. No. 42)
- Horsham District Council (Ref. No. 44).

Introduction

- 5.1 This Position Statement has been prepared by Horsham District Council (HDC) on Policy SNP2: Allocation for Residential Development on Land West of Southwater. The Position Statement sets out the support of HDC for the allocation and then responds in detail to a number of the criteria.

Support

- 5.2 The site is allocated for 422 to 450 new residential units and is the only housing allocation in the Southwater Neighbourhood Development Plan (SNDP). The District Council supports the allocation and recognises that it will make a substantial contribution to meeting housing need in the Parish and the wider District.
- 5.3 The allocations in Policy SNP2 presents an opportunity to develop a comprehensive extension to the village. The choice of this site was made by the local community driven by the desire to concentrate growth in and around Lintot Square. This option is supported by the Strategic Environmental Assessment (SEA), which recognises that it is a sustainable option close to local services.
- 5.4 The District Council does suggest one amendment to the Policy, which is also proposed in its first Position Statement and the representation by Berkeley Homes as follows: 'The development of Land West of Southwater should not prejudice the further development of the village should further sites be allocated through the Local Plan Review.' Three options for housing growth in the District are set out in Strategic Policy 14: Options for Housing Growth of the emerging Local Plan Review. A number of potential housing allocation options are then set out including 140 hectares at Land West of Southwater for 1,200 new homes. The submission SNDP does not prejudice the development of this or any other strategic site being allocated in the Local Plan Review.

Detailed comments

- 5.5 Paragraph 16 of the National Planning Policy Framework (NPPF) states that 'plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.' Policies should be flexible enough to give the decision maker scope to achieve the best possible proposal for the local community.
- 5.6 Criterion (e) of the Policy only allows three storey buildings next to the existing three storey buildings in the Broadacres development. This height restriction is considered too inflexible and could prevent well designed buildings coming forward that make the most efficient use of land. It is suggested that criterion (e) is amended as follows:
- 5.7 ~~'(e) Buildings should reduce in height and density the further they are from the village centre / Lintot Square with three storey buildings only located adjacent to the existing three storey buildings in the Broadacres development~~ and should respect the local character of Southwater through sensitive and high quality design.'
- 5.8 Criterion (g) of the Policy relates to housing mix, and refers to evidence which may have been superceded by the time an application is made to develop the site. It is suggested that criterion (g) is amended as follows:
- 5.9 '(g) The mix of C3 homes should be in accordance with the latest evidence on the required housing mix (currently the Crawley and Horsham Market Housing Mix Report November 2016 and HDC Planning Obligations and Affordable Housing Supplementary Planning Document 2017) or any later documents that supercede them.'

- 5.10 Criterion (i) of the Policy relates to the safeguarding of land for a secondary school and references Policy SNP3. The District Council supports the position of the education authority, but would look to work with key stakeholders to implement the school as a key piece of infrastructure and would seek clarity on how such provision was managed.

Conclusion

- 5.11 The District Council supports Policy SNP2 and welcomes the positive contribution it will make toward the housing supply of both the Parish and the District. However, there are some minor amendments that would improve the clarity and deliverability of this Policy.