

Horsham District Council Regulation 19 Local Plan

Topic Paper 1: The Spatial Strategy

September 2024

Key Policies covered

Strategic Policy 2 – Development Hierarchy

Strategic Policy 3 – Settlement Expansion

Strategic Site Allocations (Strategic Policies HA2-HA5)

Settlement Site Allocations (Strategic Policies HA6-HA23)

1.0 Introduction

1.1 This Topic Paper forms part of the Local Plan Review examination of the Horsham District Local Plan 2023 – 2040 (the HDLP). By way of summarising national policy, and some key evidence base including stakeholder and public engagement, it explains the overarching spatial strategy (or development strategy) of the HDLP, particularly in the context of housing needs and delivery.

1.2 The Horsham District Council Plan 2023-2027 sets out a shared vision for Horsham District. One of four headline themes is:

“Our District is a great place to live and everyone deserves to benefit. We’ll provide help in tough times and build communities where people can flourish and have fun.”

1.3 There are ten Local Plan objectives, all of which have a bearing on the spatial strategy. Objective 1 provides the essence of what the spatial strategy seeks to achieve:

“Ensure that future development in the District is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and deliver thriving communities with a strong sense of place.”

1.4 The focus of this topic paper is to explain the key factors and planning balances that have shaped the HDLP spatial strategy. Great weight has been applied to national policy and legal requirements, as these are the key considerations for achieving a ‘sound’ and legal plan. In essence, national policy requires us to take an evidence-led approach first and foremost. However there has also been considerable input from local residents, businesses and organisations, and from key stakeholders including Natural England, National Highways and the Environment Agency, and other local authorities such as neighbouring district, borough and city councils, West Sussex County Council and the South Downs National Park Authority. Details of public and stakeholder input are found in the Consultation Statement ([SD11a](#), [SD11b](#), [SD11c](#), [SD11d](#)) and in the Duty to Cooperate Statement (SD12).

1.5 The topic paper is therefore arranged under the following sections:

- National policy (the National Planning Policy Framework)
- Baseline requirements and constraints
- Consideration of alternative spatial options
- Settlement sustainability

- Assessing strategic site options
- Assessing non-strategic site options

1.6 The paper concludes by drawing together these considerations to present a brief rationale for the final strategy.

2.0 National policy

2.1 Paragraph 230 (Annex 1) of the National Planning Policy Framework (NPPF) published in December 2023 outlines that for the purpose of plan making, plans which reached regulation 19 prior to the 19th March 2024 will be examined under the relevant previous version of the Framework. For Horsham District Council, this is the September 2023 version of the NPPF. ([NPPF Sept 2023](#)) NPPF Paragraph numbers quoted in this paper therefore relate to that document.

2.2 An overarching requirement of the NPPF is the achievement of sustainable development. **Paragraph 8** of the NPPF breaks this down into economic, social and environmental objectives. This is supported by the ‘presumption of sustainable development’ as defined in NPPF **paragraph 11**. Fundamentally, these require that development is provided in the right places to support growth; vibrant, strong and healthy communities are delivered and that the natural environment is protected and enhanced.

2.3 Another key consideration for the HDLP is paragraph 35 of the NPPF, which sets out the tests of soundness for Local Plans. These require the plan to be **positively prepared**, **justified**, **effective** and **consistent with national policy**. In summary, the first three of these mean that a local plan must set out a strategy that seeks to meet the local area’s development needs, is based on proportionate evidence, is considered against reasonable alternatives, and is deliverable over the Plan period and based on effective joint working to address cross-boundary strategic matters. Other key NPPF requirements of particular relevance to the Local Plan are highlighted in Appendix 1 of this paper.

2.4 The key provisions of the NPPF are summarised in paragraph 2.3 of the Horsham District Local Plan. These in turn feed into the Spatial Vision and Objectives set out in Chapter 3 of the HDLP. The policies within the plan are then structured so that it can address all of the NPPF sustainable development objectives. Chapter 4 provides overarching policies which impact on all three NPPF objectives. Subsequent chapters generally have either an environmental, economic or social focus, although many policies are still cross cutting over a number of these themes.

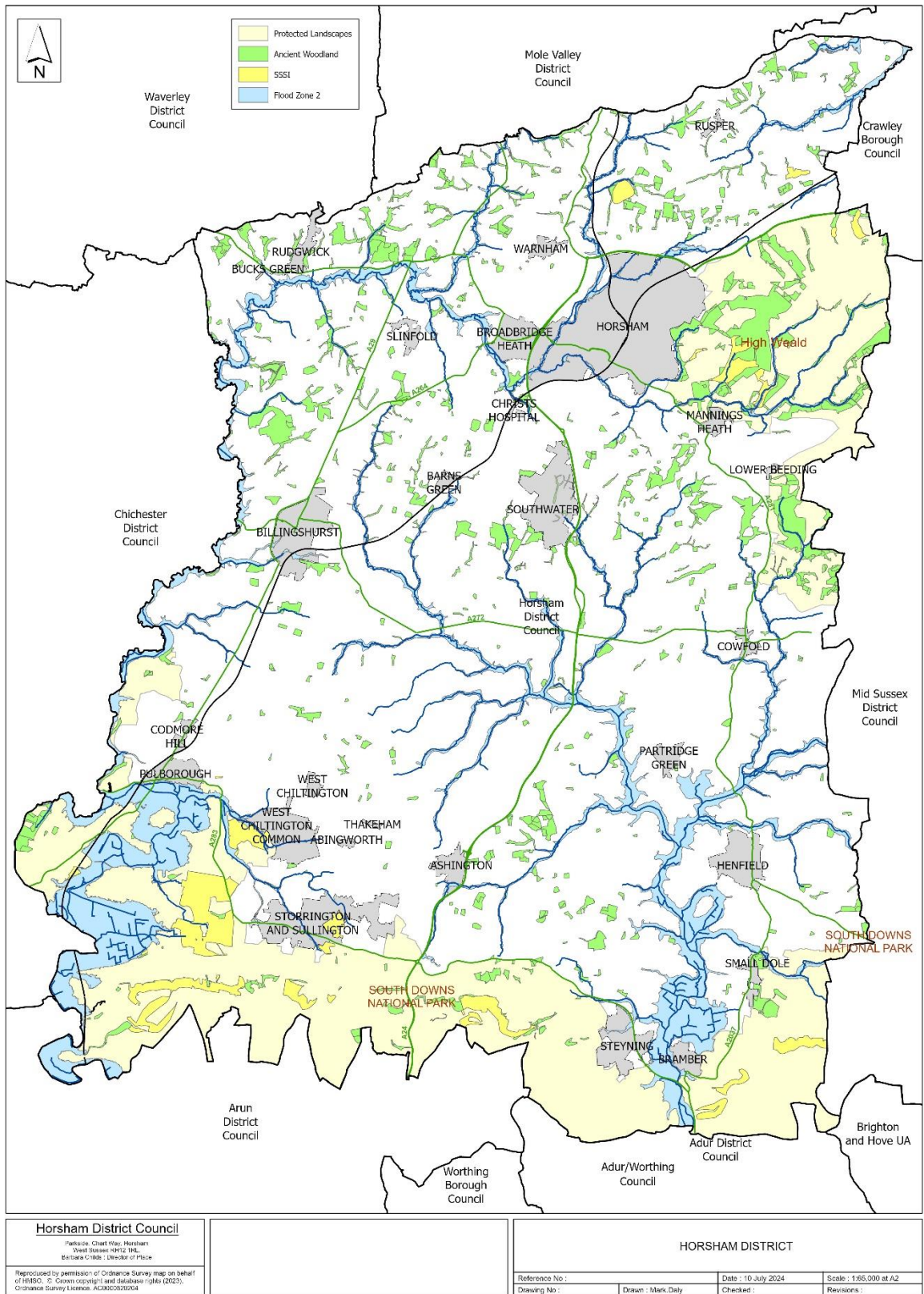
3.0 Physical and environmental context

- 3.1 The policies in the local plan are supported by both the Council's evidence base documents (as published in the [Examination Library](#)), together with feedback from the community and stakeholders as part of the Regulation 18 stage of plan preparation, and as set out in the Council's Statement of Consultation (SD11). The focus of this topic paper is how the identified development needs have been accommodated, so far as this is possible within environmental and other physical or geographical and economic constraints.
- 3.2 Map 1 overleaf shows the extent of Horsham District, with the main existing settlements, road and rail links and environmental designations. The key settlement of Horsham is located in the north of the District. The town is surrounded by a number of other smaller villages and towns located across the District. Southwater, Billingshurst, Storrington, Pulborough, Henfield and Steyning are important larger villages which provide many of the day to day needs of the District's residents. The nearest large settlement outside the District is Crawley, which is located on the NE boundary of the District.
- 3.3 The District has two railway lines – one extending from London, via Crawley, across to Horsham, through Christ's Hospital, Billingshurst and Pulborough to the South coast (Arun Valley line). The other runs north from Horsham, through to Warnham, to Dorking and eventually connects to South West London (Sutton and Mole Valley line).
- 3.4 The A24 is the key north -south road link linking Horsham with the south coast (Worthing). The A29 also provides a secondary north-south route, (towards Chichester in the south). Horsham is linked to settlements in the south-east of the District by the A281. Horsham and Crawley are connected by road via the A264. The main east west route through the District is the A272. This route links to Haywards Heath in the east and Petworth in the west. Settlements in the south of the District (Steyning to Pulborough) are connected east - west by the A283. There are no strategic road networks in the District; the A23 runs north -south, through Mid Sussex District to the east of Horsham District, and the A27 runs east west along the south coast. Gatwick airport is located on the NE boundary of the District (within Crawley borough).
- 3.5 These settlements and related infrastructure therefore set the context for any future development in the District, in terms of provision and access to existing services and facilities, and generation of development demand within the District itself.
- 3.6 The map shows that Horsham District has relatively few environmental constraints as identified within NPPF para 11 footnote 7. Many environmental constraints such as Sites of Special Scientific Interest (SSSI) and Ancient woodland are generally relatively small in scale. Ancient woodland is predominantly located in the north of the District.
- 3.7 One key constraint is the High Weald National Landscape (AONB) in the north east of the District. A section of the South Downs National Park is located in the south of Horsham District. Whilst HDC is not the planning authority for this area, the proximity of this landscape to many of the settlements in the south of the District (which often directly abut this landscape) limit the potential for southward expansion of these villages (and any opportunity to do so would be a matter for the South Downs National Park Authority (SDNPA)). The SDNPA have recognised that much of the south of the

District contributes to the setting of the National Park. In addition, a number of the southernmost villages are also constrained by Arun and Adur river floodplains. In particular this impacts the physical ability to expand north around Steyning, Bramber and Upper Beeding, and south west of Henfield.

- 3.8 In recognition of the biodiversity crisis, Horsham District Council has set up the Wilder Horsham District Partnership with the Sussex Wildlife Trust. This partnership has produced a draft [District nature recovery network](#) which although not a constraint to growth is an important consideration in the location and design of allocations so as not to hinder the significant opportunities for biodiversity and ecosystem services the area provides. This includes the landowner initiative called Weald to Waves which seeks to establish a 50 mile wild corridor from Ashdown Forest to the restored kelp forests off the Sussex coast. It takes in the Knepp Estate which is located in the centre of Horsham District and is nationally recognised rewilding project over a 3,500 acre site.
- 3.9 A key environmental constraint which emerged during the preparation of the Local Plan was the requirement for the Plan to demonstrate water neutrality. In September 2021, HDC received a [Position Statement](#) from Natural England (CC08). This explained that it could not be concluded that water abstraction at Pulborough was not having an impact on the Arun Valley SAC, SPA and Ramsar Site, and that development must not add to this impact. In the absence of alternative solutions (such as the provision of new water infrastructure, which is not within the control of local planning authorities), to comply with Habitat Regulations, all new development in Horsham District must at the current time be water neutral. In effect, this introduced an almost complete moratorium on housing development. The detail of work undertaken in this regard by Horsham District Council and other key stakeholders is set out in a separate Water Neutrality Joint Topic Paper ([CC14](#)) and the Water Neutrality Joint Topic Paper Update [CC15](#). However in broad terms, there is a need for the plan to ensure that the level of water abstraction from a site near Pulborough does not increase above existing rates in order to prevent harm to the Arun Valley.

Map 1 – Horsham District – Physical and Environmental Constraints



4.0 Baseline Housing requirements and evidence base

Housing needs

- 4.1 The HDLP (paragraph 4.1) recognises that there is a national agenda to bring forward a 'step change' in housing growth. The NPPF (paragraphs 60 to 62) is clear that to determine the minimum number of homes needed, strategic policies should be informed through the application of the standard methodology (SHM), unless exceptional circumstances justify an alternative approach.
- 4.2 The SHM is currently 917 homes per year (911 at the point the Regulation 19 was published). Over the period of the Local Plan, this provides a total housing need figure of 15,583.
- 4.3 HDC agrees that Crawley Borough cannot accommodate its full SHM housing need. The recent examination for the Crawley Borough Local Plan 2023-2040 is in its late stages, and it is generally accepted that Crawley Borough will have a total unmet need of 7,505 dwellings over its Plan period.

5.0 Local Plan Preparation 2018 - 2021

- 5.1 Horsham District has traditionally had a strong track record of housing delivery. The current adopted Local Plan (the Horsham District Planning Framework 2015 (HDPF), set a housing target of 800 dwellings per annum, of which 150 homes per year were specifically to meet the unmet needs of Crawley Borough Council. Delivery rates post 2015 exceeded these targets (see Figure 1, Section 6). To ensure a longer term continuity of housing supply, and in recognition of increased housing targets a review of the Local Plan commenced in 2018. This review recognised the relatively environmentally unconstrained nature of the district (particularly in the northern section of the District). This review took account of a number of considerations as described in the following paragraphs.

Consideration of alternative high-level spatial options for growth

- 5.2 Traditionally, plan-led development in Horsham District has broadly come forward in a combination of two forms. The first is smaller scale development within or adjoining villages and towns across the District, primarily to accommodate more local development needs. To address more strategic levels of growth, development has taken the form of larger scale strategic allocations which have provided housing led mixed developments. Recent examples of such allocations include a strategic scale expansion south of Broadbridge Heath (now built out), Highwood (West of Horsham), and Kilnwood Vale (west of Crawley), which are both ongoing, and most recently Land North of Horsham where development has commenced but has experienced delays as a result of water neutrality requirements.

- 5.3 Other strategic developments have taken place at Southwater and Billingshurst which, in addition to Horsham town were identified as the most sustainable locations for growth in the HDPF. The District does not have significant amounts of available brownfield land, and most development which comes forward in Horsham District is greenfield growth. (Around two-thirds on average is greenfield development.)
- 5.4 As part of the Local Plan review, a Sustainability Appraisal (SA) (SD03a-d) was undertaken which tested high-level strategies and strategic sites against sustainability objectives ('SA objectives'). These have focussed on both the development quantum, and spatial strategy options.

Amount of development

- 5.5 The Council's Strategic Housing and Employment Land Availability Assessment [SHELAA 2018](#) (H13) provided an initial high-level estimate of Horsham District's theoretical development capacity over the Plan period. The SA (December 2023) sets out that from this starting point, (which pre-dated Natural England's position statement on water neutrality), the following high-level growth options were considered:
- (1) **Quantum Option 1:** Lower Growth: 1,000 houses per year to meet the government's standard methodology target, plus 35.3 hectares of employment land, as required by the council's economic growth assessment.
 - (2) **Quantum Option 2:** Medium Growth: 1,200 houses per year, to meet the government's standard methodology target and also provide for some of the housing need of nearby districts, plus 43.4 hectares of employment land.
 - (3) **Quantum Option 3:** Higher Growth: 1,400 houses per year, to meet the government's standard methodology target and also provide for some of the housing need of nearby districts, plus 50.7 hectares of employment land.
 - (4) **Quantum Option 4:** near Maximum Growth: 1,600 houses per year, to meet the government's standard methodology target and to help meet the unmet needs of a number of neighbouring authorities under the Duty to Cooperate (DtC).
 - (5) **Quantum Option 5:** Maximum Growth: 1,800 houses per year, to meet the government's standard methodology target an even greater contribution to the unmet needs of neighbouring authorities under the DtC.
- 5.6 In summary, the appraisal outcomes found that higher levels of growth performed better socially and economically, for example in addressing housing need, and supporting sustained economic growth and job creation. Higher growth could increase pressure on existing services such as schools and healthcare but could also lead to new services being provided. Higher growth, however was identified to have more negative impacts on biodiversity, landscape, heritage, water, flooding, soils/minerals, air quality and climate.

Spatial options for growth

- 5.7 In addition to the quantum of growth, the Sustainability Appraisal process has also considered the potential spatial options for growth in the District.
- 5.8 The early parameters for considering alternative strategies were identified at the Regulation 18 stage of local plan development. Key alternatives for the broad distribution of development were taken forward into the SA process. More detail on the specifics of these options are set out in the SA, including the SA Addendum, July 2021. In summary, six alternative approaches were considered:
- (1) **Option 1:** Existing settlement hierarchy strategy - Focus growth in and around the key settlement of Horsham and allow for growth in the rest of the District in accordance with the identified settlement hierarchy.
 - (2) **Option 2:** Proportionate growth strategy - Growth is apportioned to all settlements in a more dispersed distribution in a way that is proportionate to the existing number of households/population. (E.g. if a settlement was identified to have 10% of the District's population it would have 10% of the total housing/growth allocations).
 - (3) **Option 3:** New Garden Towns - Strategic scale growth (90%) is delivered as new garden towns, with a small remainder (10% of total) delivered at small sites in accordance with localism principles.
 - (4) **Option 4:** New Urban Extensions - As per Option 3, but with the majority of growth focused at new urban extensions.
 - (5) **Option 5:** Employment Strategy - Focus growth in Horsham District at locations expected to see significant employment.
 - (6) **Option 6:** Sustainable transport strategy- Growth is focused at settlements in the existing settlement hierarchy (for the District) with existing rail links, access to high frequency bus services (i.e. where services run once every 30 minutes or more often) and to a lesser extent where there is good access onto the primary road network (i.e. the A24, A29, A281, A283 and A264).
- 5.9 At this high level, the SA process made some broad assumptions around the implications of large amounts of development in particular locations (e.g. potential impacts on flood risk, biodiversity, infrastructure and community cohesion). Other broad principles were applied, for example the strong economic relationship between Horsham District, Crawley and the Gatwick Diamond area; and that failure to provide some level of growth related to Crawley and Gatwick may fail to best respond to problems both of out-commuting and of unmet housing needs in this area in particular.
- 5.10 This assessment found that Options 1 and 4 performed better than the other options. Both options would provide new growth in the main settlement of Horsham Town which is the main economic centre and service provider in the District as both would provide a higher number of residents access to the largest settlements in the District, supporting the widest range of services and facilities and employment opportunities. The SA also recognised that in a higher growth scenario it may still be necessary to deliver some growth in the form of a new settlement although this option performed

less well against the sustainability objectives. This subsequently informed the development of 15 potential scenarios for development quantum and growth locations across the District as part of the sustainability appraisal process. This included the Preferred Strategy Option. This is discussed in more detail in paragraphs 5.19 to 5.23

Settlement Sustainability

- 5.11 The SA process built in a broad assumption that higher order settlements are more likely to provide local services and opportunities for low- or zero-carbon travel and are therefore more ‘sustainable’ (and perform better against many of the SA objectives). However, a separate, comprehensive exercise was undertaken to provide a more detailed basis upon which to make recommendations on settlement site allocations. ([Settlement Sustainability Assessment 2022](#) - EN07).
- 5.12 The current local plan (the HDPF) sets out a settlement hierarchy, the main purpose of which is to seek to ensure that development takes place in the most sustainable locations within the District. In general terms, it is accepted that the most sustainable developments are those which are located close to employment opportunities and have a good range of local services and facilities such as shops, schools, doctors’ surgeries and recreational facilities. Sustainable development can also be easily accessed by road or public transport, and has a minimal impact on the environment, with no impact on important habitats and species (unless fully able to be mitigated) and requiring low levels of resource consumption.
- 5.13 The assessment considered how different settlements in the District are currently ‘performing’ in terms of their sustainability and whether the existing development hierarchy, as outlined in the HDPF is fit for purpose. The assessment took account of the level of service provision in different settlements across the district, and as part of this exercise, the Council sought input from local parishes to ensure that this information was as accurate as possible.
- 5.14 Ultimately the study concluded that in broad terms, Horsham town remains the most sustainable settlement within the district, with settlements such as Southwater and Billingshurst also performing well against the district hierarchy. The Settlement Sustainability Assessment forms the main evidence the development of HDLP Strategic Policy 2: Development Hierarchy. Related to this, Strategic Policy 3: Settlement Expansion sets out principles used in the selection of proposed site allocations. The policy objective is to ensure that the overall settlement function and pattern of the District is retained, retaining the rural character of the District. This sits alongside seeking to meet the identified local needs of these settlements, provide an appropriate level of housing, and maintain the viability of local schools, shops and facilities.

Site Selection and Assessment

- 5.15 Following the identification of an overarching locational strategy for growth, the Local Plan review also undertook a detailed assessment of sites submitted to the Council and contained within the Council’s SHLAA assessment. The methodology and criteria were subject to stakeholder consultation, and the outcomes of this assessment process form part of the Council’s Site Assessment Report December 2023 and published as part of the Council’s evidence base. This assessment looks in detail at

the sites' suitability and deliverability under several different criteria. The proposed strategic sites were also assessed as part of the Sustainability Appraisal process.

Individual Strategic Site Assessment considerations

5.16 The site assessments identified some clear distinctions in the suitability and deliverability of the sites under consideration. It became clear from these assessments that some of the proposed strategic developments would not be considered compliant with national policy. With regard to individual sites, reference should be made to the full site assessments for further details (set out in H11), but impacts that led to the conclusions that these sites should not be allocated included:

- a particularly adverse impact on the landscape;
- very poor opportunity for active or sustainable travel to the host settlement;
- severance from the host settlement by a major road with a high speed limit;
- be out-of-scale with a medium-sized host village with limited services (i.e. not in keeping with the settlement hierarchy).

Sustainability Appraisal considerations

5.17 In addition, the Sustainability Appraisal assessed 12 'large site alternatives' assessed against SA objectives. It should be noted that three of these sites have, during the preparation of the local plan been withdrawn by the respective site promoter from consideration for this local plan cycle. These are: Land West of Kilnwood Vale (strategic scale growth); Rookwood Golf Course, and Land North East of Henfield ('Mayfield').

5.18 Overall, all the development of individual strategic sites were identified to have a positive impact in terms of provision of homes and support for economic growth, whilst there were varying negative effects relating to the environmental objectives. However, a distinction was drawn between urban extensions and stand-alone new settlements: extensions generally performed better overall given their level of access to existing jobs, services and facilities. In particular, delivering new large-scale development at these locations can provide access to jobs, services and facilities where existing residents could easily get to them, and would help to limit the need for residents to travel longer distances.

Assessment of combinations of sites

5.19 In addition to the individual assessment of sites, the sustainability appraisal process also considered the impact of allocating various combinations of strategic scale development, together with smaller scale growth.

5.20 The SA ultimately considered 15 such strategy scenarios (including the Preferred Strategy option). These considered low growth scenarios of between 7,000 and 10,000 new homes; medium-growth scenarios of between 10,000 and 13,000 homes, and higher growth scenarios of between 14,000 and 23,000 homes. (These numbers represent newly permitted homes only, and do not factor in existing permissions). The scenarios also covered different combinations of spatial approach e.g. settlement hierarchy plus urban extensions; new settlements plus small sites; an east-west distribution avoiding significant development in the north of the District; a focus of

development in the northern District and ‘at Crawley’, et cetera. The details of these options are set out in the text box following paragraph 7.8 in the draft Regulation 19 LUC SA and are also contained in the Sustainability Appraisal Addendum July 2024.

- 5.21 The more fine-grained analysis of these combinations was carefully looked at both within the SA process, and whilst developing the Local Plan Spatial Strategy. Options that focused development around existing settlements, through a combination of small sites and strategic-scale urban extensions, tended to perform better overall against SA objectives.
- 5.22 In broad terms, the assessment of different scenarios through the SA process concluded that higher growth scenario options, whilst performing well against housing and economic objectives, had more negative outcomes on the environmental objectives (and these impacts were most severe for the very highest growth options). Conversely, the lower growth scenarios were found to reduce the likelihood of significant adverse environmental effects but would only make only a modest contribution to providing homes and jobs for the unmet needs of neighbouring authorities. Ultimately, the medium growth scenarios (2a to 2g), together with the then-proposed Preferred Strategy option (described in SS02) were found to represent a balance between the two. The then-proposed Preferred Strategy broadly aligned with the level of development to be provided through the medium growth scenarios.
- 5.23 From the assessment of the combination of different sites, the then-proposed Preferred Strategy option was found to enable new service provision at new larger sites and could also provide a larger proportion of development by the existing larger settlements where there is a strong service and job offer. A level of development was allowed for at smaller sites which could be achieved in line with the development hierarchy, which will help to prevent the stagnation of existing services in rural areas and smaller settlements, but equally did not include disproportionately high levels of growth in these locations (such as Ashington) that would otherwise generate high levels of out-commuting from smaller settlements. The development of the new settlement site would, whilst less sustainable than other locations for growth in the then-proposed Preferred Strategy would allow for a new long term focus for housing development (recognising the step change in housing growth required).

Additional considerations

- 5.22 In addition to the above, two key balancing factors were also factored into the process of arriving at a preferred strategy, the first relating to the overall quantum of development in a given market sub-area, and the second relating to specific settlements and sites:
1. the need to consider the market’s capacity to deliver the numbers required in sub-areas of the wider housing market area, and
 2. ensuring that the overall character of a given settlement with its setting was not unduly impacted.
- 5.23 The basis for assessing the first of these was the [Housing Delivery Study 2020](#) (HO2) which considered the market capacity for growth in the District. The very highest levels of housing delivery tested were not considered to be achievable, with an

average of around 1,200 considered realistic in market terms. The study also concluded that there was particular potential to accommodate growth around Horsham and Crawley, but that this was more limited in other areas of the District (e.g. allocation of multiple strategic sites in /around Billingshurst). The study also recognised that infrastructure capacity and delivery could impact the ability to deliver growth.

- 5.24 Regarding the second of these, consultation and feedback from local communities and parishes identified significant concern over losing their ‘sense of place’, with additional comments reflecting pressure on existing infrastructure, and delays or slowed delivery of other infrastructure required to support development. Whilst this doesn’t necessarily mean that residents are unable to access services, they are often further away (schools in other settlements for example), which impacts on day to day life, sustainable travel, and community cohesion. The Council was also mindful that some larger villages in the District have also already seen very significant amounts of new housing development in the last decade, and that the emerging plan continued to identify these places as locations for further strategic development (Southwater and Billingshurst in particular). Whilst, the Council has recognised that as larger and more sustainable settlements, these settlements provide opportunity for some further, carefully planned strategic development there are natural limits to both numbers and pace before the impacts on character and communities become unmanageable, both in practical terms such as the rate of infrastructure investment, but also in the formation of cohesive communities.

2021 Strategic Strategy Conclusions

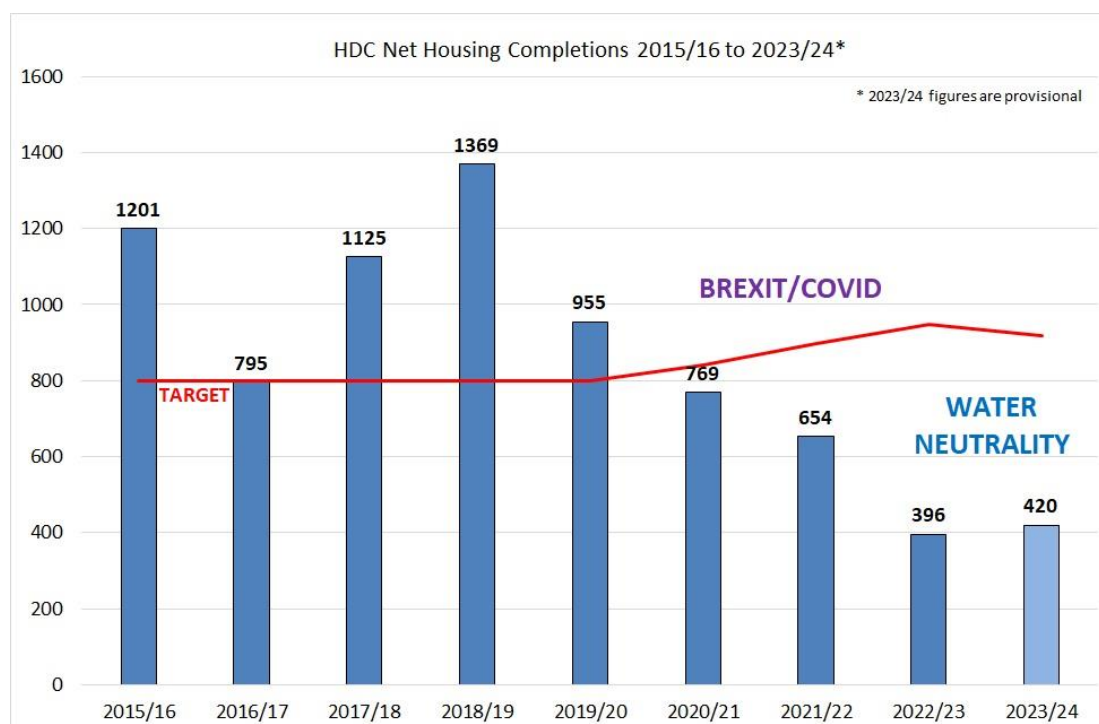
- 5.25 In 2021, drawing from the SA’s conclusions alongside objectively assessed housing needs, settlement sustainability evidence and taking additional cross-boundary housing needs and evidence of how quickly housing can come forward (see HO2 Housing Delivery Study 2020), a housing target of 1,100 homes per year was identified as the preferred alternative. This was judged to balance a positive outcome for housing the economy within market constraints with the need to protect and enhance the environment. This would have represented a significant uplift on the current adopted HDPF target of 800 homes per year and would continue to meet unmet housing needs from other District’s and borough’s – and in particular Crawley.
- 5.26 In terms of the locational strategy for growth, the evidence and SA outcomes led to a preferred strategy which focused on strategic-scale settlement expansions (West of Crawley, continuation of the strategic site at North Horsham, Southwater and Billingshurst), with additional smaller site allocations to support more local needs and maintain the vitality of these settlements. However, one new settlement was considered to be justified to help ensure housing delivery over the plan period.
- 5.27 In the case of Billingshurst, it was concluded that the allocation of more than one strategic site would not be justifiable whilst meeting the tests set out in national guidance. In any case, as explained in the Site Assessment Report (H11), there were also compelling site-specific reasons as to why one of these, Land West of Billingshurst, was not recommended for allocation.

- 5.28 Furthermore, and for the same reason, for the two large villages hosting a strategic allocation (Billingshurst and Southwater), it was not considered reasonable for additional edge-of-settlement sites to come forward over and above those which already have permission and are included in the Council's local plan housing trajectory, reflecting community concerns about the need for growth to be embedded with new infrastructure and help maintain community cohesion. It should be noted that even so, windfall development will be able to continue to come forward in these villages within the built-up area boundary.

6.0 Impact of Water Neutrality Requirements

- 6.1 A draft Regulation 19 Local Plan was considered and endorsed at a Cabinet Meeting on 15th July 2021 (SS02). This did not progress to a full Council meeting due to an amendment to the NPPF just after the Cabinet meeting and then Natural England issuing the Water Neutrality Position Statement on 14 September 2021,(CC08) requiring all development (including that proposed in the Local Plan) to be water neutral. The impact of water neutrality has had a very significant impact on both development and plan making in the District.
- 6.2 The need to develop a strategic scale solution to water neutrality was recognised by all affected local planning authorities who commissioned the Water Neutrality Study (part B – CC09 and part C – CC10), the detail of which is summarised in separate topic papers (CC14 and CC15).
- 6.3 Initially the focus of the LPAs was on fully understanding the issue and the Part B work tested the combined growth figures in the WRZ as identified in emerging Local Plans at that time. For Horsham, this included the trajectory from the draft Regulation 19 Local Plan considered by Cabinet in July 2021.
- 6.4 As the Part C work was being prepared, it was becoming apparent that the levels of growth, promoted by the draft Regulation 19 Local Plan considered by Cabinet in July 2021, were unlikely to be achieved. Initially, the impact of the Covid-19 pandemic, together with supply chain impacts as a result of Brexit slowed delivery. Since the Natural England position statement in September 2021, the only development that could take place were schemes that were either fully consented prior to receipt of the position statement, or those that could be demonstrated to be water neutral. This has led to a very significant fall in completions. Completions for 2022/ 2023 and 2023/24 are in the region of 400 homes as illustrated in Figure 1 overleaf.

Figure 1 Housing Completions 2016-2024

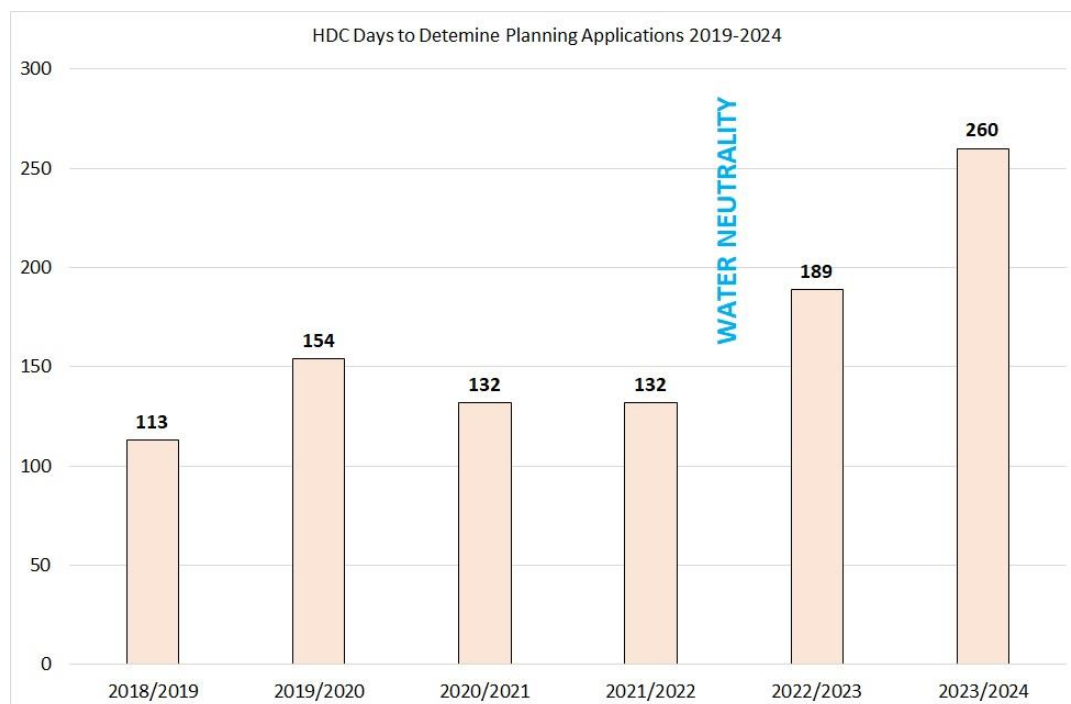


6.5 A key outcome of the Part C work were recommendations in how to deliver a water neutral local plan. This relies on both water saving measures from Southern Water, together with additional demand for water arising from development being met through either the Council’s offsetting scheme (Sussex North Offsetting Water Scheme – SNOWs) or private measures. This work is ongoing, but prior to these measures becoming operational, site promoters have had to rely on bespoke, private solutions to delivering water neutral schemes. Solutions have varied in approach, including boreholes to provide water supply and off-site offsetting on existing water users (farms, or existing homes). This has proven to be challenging to deliver such solutions in practice, due to legal and technical barriers, as well as costs. The HDC website provides advice to site promoters on the level and nature of detail which is required to ensure any new development can demonstrate compliance with the habitat regulations (see the [water neutrality application advice](#) webpage). This is regularly updated, but clearly demonstrates the significant level of detail and complexity of information that is currently required.

6.6 This has led to significant delays into the determination of planning applications. Many smaller scale housing sites submitted in late 2021 have yet to be determined as water neutrality matters have not been satisfactorily resolved (for example, application DC/21/2233 – Land at Glebe Farm, Steyning, and application DC/21/2466 – Greendene, Pulborough). Figure 3 shows an increase in the days to determine applications has increased since receipt of the position statement.

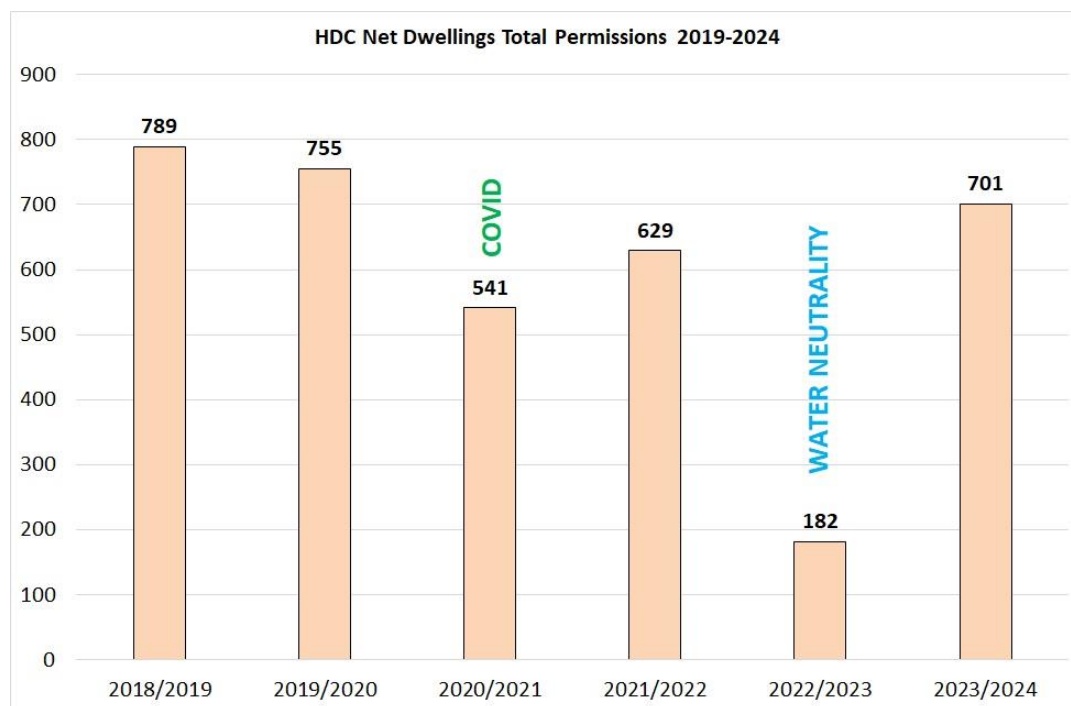
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Figure 3 Days to determine Planning Permissions 2019 to 2024



6.7 Figure 4 shows the number of planning permissions granted each year. Whilst there has been a recovery in permissions granted in 2023/4, this figure hides the length of time taken to determination as outlined above. Full and outline planning applications on existing allocations (HDPF and Neighbourhood Plans) were unable to be granted (with water neutrality sometimes the sole reason for refusal). This was also the case for reserved matters applications on sites already benefitting from outline permissions and thus would not be delivering in the short-term.

Figure 4 Net Dwelling Permissions 2019 to 2024



- 6.8 With efforts concentrated on understanding the issues brought up by the Natural England Position Statement, little work had been progressed on offsetting measures by either the development industry or the LPAs to enable planned development to come forward, with LPAs focussed on acquiring resource to fund such work. Given this evolving context, it was not felt realistic to assume that development levels would not be severely constrained in the short-medium term of the plan-period. Accordingly, assumptions were altered for the Part C work, based on emerging evidence and planning judgment. This assumed that less development could be achieved over the plan period (averaging 800 homes per year), significantly lower than previous versions of the Local Plan had identified.
- 6.9 As can be seen in the tables and figures above, the assumptions used to form the Part C work (CC11) have been broadly reflected in reality. Permissions and delivery are at historically low rates. Whilst a great deal of work has occurred to develop the LPA's Sussex North Offsetting Water Scheme (SNOWS) based on Part C's recommendations, the scheme is still not operational and, though expected to be operational by the end of 2024, will only initially be able to deliver a limited amount of capacity. A particular issue is that the main mechanism for eliminating the need for water neutrality – a water recycling facility and pipeline being taken forward by Southern Water – won't be operational until at least 2031. Thus, SNOWS will not have an immediate transformational impact on approval rates and predictions of low growth in the short-medium term are therefore likely to come to pass.
- 6.10 There have been many challenges in bringing SNOWs into operation, in part as a result of the requirement for water neutrality being the first of its kind in England. which have therefore been factored into the Council's consideration of how many homes it can realistically deliver in the plan period.
- 6.11 Firstly, around 12% of the water needed for offsetting will either need to be provided by SNOWS or by private solutions. As already outlined, our experience to date is that whilst some site promoters have sought to rely upon bespoke, private solutions (e.g. boreholes to provide water supply and off-site offsetting on existing water users) to enable specific developments to come forward – with some achieving permission – this continues to be challenging to deliver such solutions in practice, due to legal and technical barriers, as well as costs. Similarly, it has been more difficult for SNOWS to acquire sources of credits from registered providers, given that some registered providers have made commercial deals and partnered with particular developers rather than make available water credits for SNOWS.
- 6.12 The remaining 88% of water supply for the Local Plan will be accommodated through the emerging Water Resource Management Plan being developed by Southern Water. This programme has been significantly delayed, (with consultation now having eventually started on 11th September 2024 and concluding on 4th December 2024). The water use assumptions supplied to the Part C may have changed through the WRMP preparation process. Because of the uncertainty, Part C incorporated a 10% safety margin when using Southern Water's figures to allow for some non-delivery of water saving measures. Should Southern Water not achieve savings within this range, SNOWS will have to increase in scope to show that the levels of development could be achieved, and/or there would have to be reliance on private solutions undertaken by the development industry in order to prevent a reduction in the level of

development coming forward than predicted. In the absence of data from Southern Water during plan preparation, this uncertainty has again led to caution in setting deliverable housing targets through the plan period.

7.0 Local Plan Preparation 2021 -2024

Housing Delivery Considerations

- 7.1 Paragraph 35 of the NPPF requires that local plans are deliverable in order for them to be found sound. Given the impacts of water neutrality outlined in section 6 of this paper, it was concluded that the level of housing growth set out in the 2021 Local Plan would no longer be deliverable. As outlined in section 6, a broad assumption of around 800 dpa was considered in the Part C study. This was then subsequently refined in developing the final preferred strategy. This took account of the following:

Reduction in Housing Supply at the Start of the Plan Period.

- 7.2 The delays to the publication of an updated Regulation 19 Plan resulting from the need to develop a solution to water neutrality resulted in the loss from the housing supply of all completions from 1 April 2021- 31 March 2022 and from 1 April 2022 – 31 March 2023, that had initially been factored into the housing trajectory. There were 654 net completions in 2021/2022 and 396 net completions in 2022/2023. This makes a total loss of supply of 1,050 dwellings, across all types of housing development (strategic and small scale). This detail is set out in Appendix 2.

The Delay in Plan Making has reduced the immediate ‘pipeline’ of sites

- 7.3 A key purpose of the Local Plan is to ensure a ‘pipeline’ of sites over the plan period. A consequence of the delay to the local plan the start date of any allocated sites would be delayed (with a ‘lag’ in both receipt of outline / full permissions) and subsequent ground preparation works before development can commence. This is particularly applicable to the smallest of the Strategic Sites (Land East of Billingshurst) but also a large number of the additional Smaller Sites and Neighbourhood Plan allocations. Furthermore, whilst the delay to the Local Plan has been just over 3 years, evidence has also shown that due to the difficulties involved in finding water neutrality solutions (whether certain sites are waiting on the SNOWS strategic scheme, or finding their own offsetting/borehole solution), it may well be the case that certain sites will actually be delayed by 4 or 5 years – and this uncertainty has therefore also been taken into account.
- 7.4 A careful review has been undertaken of the nature and type of existing permissions, to consider the likely timeframe in which they are progressing or are anticipated to come forward. This has been based on information received from the site promoters, on-site monitoring and experience of historic delivery rates in the District. The review considered:
- No. Of Dwellings Expired before 1 Apr 24/ or about to expire
 - No. Of dwellings completed before 1 April 2024
 - No. Of Dwellings included in 5 years 2024-2029
 - No. Of Dwellings included in Years 2029-2040

This detail is set out in Appendix 2. In summary however, of the total permissions between 2021/22 and 2023/24, there is a total of 1,394 permissions. Of this number, 172 are expected to expire shortly; 209 have already been built out, 632 are expected to be completed between 2024 and 2029 and 381 won't complete until after 2029.

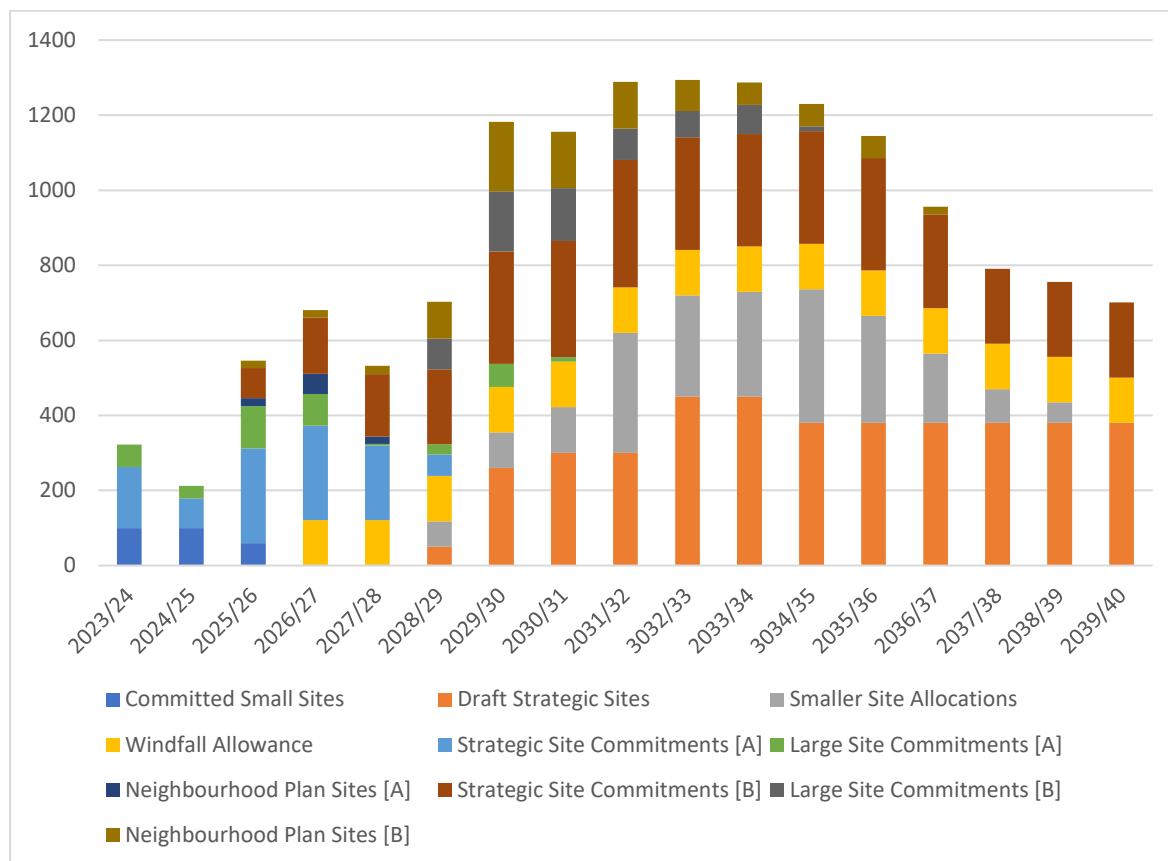
- 7.5 Compared with the first five years of the Housing Trajectory for the Regulation 19 Local Plan (July 2021) which contained a total of 4,986 dwellings in Years 1-5, this figure has now been reduced to 2,770 for the first 5 years of the Regulation 19 Plan (December 2023). That is a difference of approximately 2,200 dwellings. The main differences between the Trajectory from July 2021 and from December 2023 are:
- A drop in delivery of commitments of approximately 620 dwellings between 2021 and 2023
 - A drop in delivery of 190 dwellings in Strategic Site Allocations
 - A drop in delivery of approximately 1,280 dwellings in Additional Smaller Sites

Housing Delivery Study Update (Dec 2023)

- 7.6 Given the delays to the local plan and the impact of water neutrality, it was considered appropriate to undertake a [Housing Delivery Study Update](#) –(HO3) to review the impacts of the market's capacity and the water neutrality constraint. Many of the broad conclusions of the study with regards to the locations for growth were similar to that of the 2020 study, and in particular the conclusion that there remains potential for strong growth in housing in the northern and central parts of the District. The study (paragraph 6.13) identified that there are potential infrastructure and market capacity constraints which would limit the potential to bring forward significant additional development in the Billingshurst area without impacting on build rates for the sites identified, including the provision of an electricity supply. There are also some challenges to seeking to introduce and deliver additional supply in the southern part of the District owing to the quantum already proposed in the emerging Local Plan, with a particular pinch point of 1.5% growth over the period 2028-36 period – an unprecedented level of growth in this sub-area (which is also environmentally constrained, as described earlier in this paper).
- 7.7 Ultimately, the Housing Delivery Study arrived at a headline annualised deliver figure of around 870 dwellings per annum (dpa) – this is based on past 'peak year' growth rates being exceeded hence is optimistic yet is still below the SHM figure of 917 dpa. There is however great variation in the delivery across different years, as shown in the figure 5 below (Figure 5.1 in the HO3). Paragraphs 5.8 and 5.9 of the Horsham Housing Delivery Study Update anticipate a peak delivery of around 1,294 homes in 2032/33. On this basis, a peak period 2028-33 would see delivery on average at 1,125 homes per annum – this is 3% higher than the delivery achieved in Horsham District over the high-point period of 2015-2020 (1,089 dpa). It should be noted that these figures do not take account of the need for a contingency buffer of between 5% and 20% in line with national policy on year-on-year supply, which in effect lowers any corresponding local plan housing target.
- 7.8 A key assumption of the study was that it can be expected to take approximately 3.5 years from submission of an outline planning application for a strategic site until first completions. The study also made an assumption for submission of outline or hybrid

planning applications of June 2024 (West of Ifield), Quarter 3 in 2025 (North West Southwater) and late 2023/early 2024 (East of Billingshurst). No planning application has yet been submitted for the two sites where these were already anticipated, and therefore the phasing of delivery assumed by IcenI for both West of Ifield and East of Billingshurst will be delayed.

Figure 5: Horsham Regulation 19 Housing Trajectory: IcenI Adjustments



7.9 The Housing Delivery Study Update breaks the local market down into three sub-areas: North (broadly the Horsham/Crawley area, including existing strategic sites at both towns), West (Billingshurst and Pulborough area) and South (focussed around Storrington, Henfield and other nearby villages). Based on past delivery rates and future market dynamics such as expected employment growth and existing infrastructure, IcenI then provided analysis of what each area could deliver, summarised as follows:

North sub-area:

- Would account for 71% of total planned growth.
- Can achieve higher housing growth due to jobs, infrastructure and Crawley’s constrained ability to grow within its boundaries.
- The peak delivery of 860 dpa would occur over the period 2032-37 (which is higher than the average of 639 dpa achieved during the previous peak 2012-2019).

- The forecast single-year peak of just over 900 in 2036/37 is below the historic peak of around 1,000 homes in 2019.

West sub-area:

- The Council's preferred strategy would see a growth rate of 2% during the peak build-out period of 2028-33 which Iceni consider as "ambitious; but not necessarily unrealistic" (paragraph 5.33 of the Study).
- Average build-out rate in this area was 140 dpa from 2012-2021, however completion rates have varied greatly, and have most recently fallen to 56 dpa
- Slower growth mid-Plan period could be made up for as the East of Billingshurst strategic site continues to build out.

South sub-area:

- There are no strategic site allocations proposed in this sub-area.
- Delivery to exceed 380 dpa in 2031/32 which would be an unprecedented level of development compared with historic rates of delivery.
- Iceni consider that sustaining delivery of over 250 dpa in this sub-area "could be challenging albeit achievable; we see limited potential to sustain higher levels of growth over the period to 2031, particularly as the sub-area is restricted by the limited economic drivers" (paragraph 5.42).

7.10 The assumptions made in the Iceni study are considered by HDC to be realistic only given favourable circumstances throughout the entirety of the Plan period. Given delays to the assumed date of receipt of planning applications, together with monitoring of build out rates on existing strategic sites, which are currently considerably lower than assumed, these figures were considered to be highly optimistic in terms of the reality of growth rates and ongoing uncertainties in relation to water neutrality, and particularly given these figures unprecedented rates of growth within market sub-areas at certain points in time. Even so, Iceni's relatively optimistic forecasts of delivery rates averaging 870 dpa across the Plan period still represent a shortfall of housing delivery against the SHM calculated figure of 917 dpa, and certainly below the 1,100 dpa that was being planned for in summer of 2021 before the introduction of water neutrality.

Sustainability Appraisal considerations

7.11 The Sustainability Appraisal recognised that a revised preferred strategy would need to deliver a lower rate of development that was tested in 2021. Whilst the increased negative impacts on the housing objectives were understood, the particular exceptional circumstances resulting from the water neutrality requirements limited the council's ability in pursuing the other options for growth previously considered, given the requirement not to cause further harm to the SAC. A level of development of around 800 homes a year was assessed through the full SA process. Commensurate with earlier iterations of the SA, lower housing delivery rates were still found to perform less well against social objectives, (particularly the housing objectives). There was however a commensurate boost in performance against the environmental objectives – particularly biodiversity.

- 7.12 In developing the lower growth strategy, many of the conclusions from the 2021 Sustainability Appraisal process were still found to be valid. Overall, the conclusion from the SA that options 1 and 4 (Existing settlement hierarchy and new urban extensions) together should form the main basis for the locational strategy was carried forward. Other sites which had been assessed as part of the scenario testing exercise, which had performed less well against the sustainability criteria (such as the Ashington Cluster and the 350 homes west of Kilnwood Vale) were not pursued. Other strategic sites (e.g. Rookwood and Mayfield) were no longer available as potential allocations. Given that the sustainability appraisal process had concluded that new settlements performed less favourably against the sustainability objective, these sites were therefore not incorporated into the Preferred strategy, given the challenges of delivering a higher housing target in the context of water neutrality.
- 7.13 This led to an option that allocates land West of Crawley, continuation of the strategic site at North Horsham, together with allocations West of Southwater and East of Billingshurst. In addition additional smaller site allocations were included to support more local needs and maintain the vitality of these settlements.
- 7.14 The assessment of the Preferred Strategy found that in common with all previously assessed lower growth scenarios (1a to 1d) there would be lower significant adverse environmental effects than higher growth options previously considered. However, the strategy was recognised that it would only make a more modest contribution to providing homes and jobs, with very limited ability to provide for the unmet needs of neighbouring authorities. Whilst this strategy has been pursued, it is in the context of the legal requirements placed upon the authority to ensure no adverse impacts on the Arun Valley sites.
- 7.15 Notwithstanding this point, it was identified that the allocation of three additional strategic sites, along with the existing strategic allocations which are still building out, provide an appropriate geographical spread, are sustainably located and will in combination deliver a significant proportion of the District's housing need going forward.

Preferred Strategy Outcomes

- 7.16 Following the receipt of the Position Statement in 2021, the subsequent monitoring of impacts, and updates to the evidence base have led to a conclusion that the local plan can deliver some 13,212 new homes can now be delivered in the Plan period. This equates to an average 777 homes per year. However the target is lowered for the first five years of the Plan to 480 per year, to reflect the lack of a pipeline supply of permissions and that schemes available to offset water use will be in their infancy. This goes up to 901 per year for the rest of the Plan period, in anticipation that there will be good availability of water offsetting credits from around year 6. Whilst it is recognised that 777 is below the standard housing need figure of 917 homes per annum, it is clear that there are exceptional circumstances that impact the ability of the District to deliver significant levels of growth over the plan period that do not conflict with the requirements for sustainable development in NPPF para 11 footnote 7. Whilst it is accepted that there will ultimately be a longer term solution to this issue, there is no evidence to clearly demonstrate that higher levels of growth are

practicably deliverable at this time. Furthermore, the allocation of additional three strategic sites, which will in combination deliver around 2,985 homes in the Plan period and 4,650 in total over their full build out periods, is unprecedented in previous local plans prepared for Horsham District.

8.0 Conclusions

- 8.1 This paper summarises the process by which the Council has arrived at an appropriate spatial strategy which is founded on sustainable development principles. The strategy arrived at sets out the overall pattern and scale of places, and makes provision for a range of land uses, albeit the main driver for the strategy is housing need as evidenced by the standard housing method, and taking account of the major constraint of water neutrality. The strategy focus is on the local plan period 2023-2040, however with regards strategic site allocations the Plan considers the vision beyond the 17 year plan period. The strategy includes a total of 1,795 homes on non-strategic site allocations providing a range of uses alongside three strategic site allocations, together with existing permissions and windfall development. The strategy therefore ensures a range of site sizes and provides opportunities for small and medium enterprise developers.
- 8.2 The Sustainability Appraisal (SA) process has considered several high-level strategy options against sustainability objectives. The overall conclusion from the SA was that options focused around existing settlements using a combination of small sites and strategic-scale urban extensions tended to perform better across the SA objectives. The eventual preferred spatial strategy builds on the District's settlement hierarchy whilst also taking account of site-specific factors.
- 8.3 The selection of 3 strategic sites (and not more) is based on the reality of more than this number being undeliverable, due to uncertainty around water supply and tied to risks around water offsetting and market capacity to deliver multiple strategic sites at scale. In making the selection against the alternatives, the Council has had regard to the objectives of the Plan, sustainability objectives, the development hierarchy (settlement hierarchy), housing sub-market constraints, and communities' input regarding the proportionality of new development scale with settlements hosting this growth. The selected strategic sites have appropriate geographical spread, are sustainably located, and will in combination deliver a significant proportion of the District's housing needs going forward. This strategy is supported by the delivery of 1,795 homes on non-strategic scale locations across the District, in accordance with the settlement hierarchy approach outlined in this paper. In addition, it should be noted that an allowance for windfall housing development has been included in the housing trajectory. It is expected that most windfall development will occur at a small scale on previously developed land or within settlements' built-up area boundaries. This will further add to the range of opportunities for development in the District to come forward sustainably.

Appendix 1 – Key NPPF paragraphs

- **Paragraph 11** requires that (a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects, and (b) should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless one of two exception clauses apply. These exceptions are where:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷, or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote 7 clarifies that the policies referred to are those in the NPPF (rather than those in development plans) relating to, inter alia, habitats sites (and those sites listed in paragraph 181 – see below) and/or designated as Sites of Special Scientific Interest.

- **Paragraph 20** states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for a range of uses. The uses specified in the paragraph include housing, employment, retail, leisure, commercial development, infrastructure, community facilities (including health and education), conservation of the natural, built and historic environment, and measures to address climate change mitigation and adaptation.
- **Paragraph 22** states that strategic policies should look ahead over a minimum 15 year period from adoption. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- **Paragraph 23** states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This includes allocating sufficient sites to deliver the strategic priorities of the area, unless these can be met in other ways, e.g. brownfield registers or non-strategic policies.
- **Paragraph 26** highlights the importance of effective and on-going joint working between strategic policy-making authorities and relevant bodies, in particular in planning for new infrastructure and to meet development needs that cannot be met in the area where they arise.
- **Paragraph 31** states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. **Paragraph 32** says that local plans

should be informed by a sustainability appraisal ('SA') that meets the relevant legal requirements, and should avoid significant impacts on sustainability objectives in the SA.

- **Paragraphs 60 to 62** sets out how local plans are expected to support the Government's objective of boosting the supply of housing. Key is the preparation of a local housing assessment, conducted using the **standard method** in national planning guidance, unless there are exceptional circumstances. Unmet needs from cannot be met in neighbouring areas should also be taken into account. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- **Paragraph 66** requires the establishment of a housing requirement figure for the whole district. This should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- **Paragraph 68** makes clear that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- **Paragraph 69(a)** states that local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.
- **Paragraph 73** is especially relevant for Horsham District. It says that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:
 - a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
 - b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
 - c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;

d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and

e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

- **Paragraph 79** emphasises the importance of promoting sustainable development in rural areas where this enhances and maintains the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.
- **Paragraph 82** expects a clear economic strategy which positively and proactively encourages sustainable economic growth. The strategy should be supported using policy criteria or identification of strategic sites which should also meet anticipated needs over the Plan period. **Paragraph 85** says that planning policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.
- **Paragraph 105** expects the active management of patterns of growth in support of sustainable transport objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- **Paragraph 106** supports mixed use development to reduce the number and length of journeys, and expects planning policies to be prepared in alignment with investments for supporting sustainable travel.
- **Paragraph 119** expects local plans to promote an effective use of land in meeting development needs, making as much use as possible of previously-developed or 'brownfield' land.
- **Paragraph 159** urges that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. **Paragraph 161** says that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. **Paragraph 162** clarifies that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- **Paragraph 174** explains that planning policies should contribute to and enhance the natural and local environment. This includes valued landscapes, sites of biological or geological value and soils. Policies should minimise impacts on and provide net gains for biodiversity, should have regard to risk of pollution or exposure to pollution, and help to improve local environmental conditions such as air and water quality.

- **Paragraph 176** states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- **Paragraph 181** lists environmental designations that should be given the same weight as habitats sites (which include Special Areas of Conservation -SACs, and Special Protection Areas -SPAs). They are 'potential SPAs and possible SACs', listed or proposed Ramsar sites, and sites identified or required as compensatory measures for adverse effects on designated or potential/possible habitats sites.

Appendix 2 – Housing Delivery Considerations

Table 1 – Housing completions 2021-2023.

Site	2021-2022 Completions	2022-2023 Completions	Total Completions
Strategic Sites			
Land at Highwood	172	33	205
Kilnwood Vale, Colgate Phases 2 and 3	83	80	163
Kilnwood Vale, Colgate Phase 6A	12	82	94
Land West of Southwater (Broadacres)	54	17	71
Land North of Horsham	0	49	49
Land South of Marringdean Acres	0	34	34
5+ Commitments			
Land East of Billingshurst	61	0	61
Land at Bennetts Road, Horsham	21	0	21
Century House, Station Road, Horsham	49	0	49
Sussex House , North Street, Horsham	0	30	30
Land at Old London Road, (The Vineyard) Washington	0	16	16
Small Sites (1-4 Dwellings)	141	81	222

Table 2: Planning Permission Breakdown 2021-2024

Housing Permissions					
Year	Total Dwellings Permitted	Total Full & Reserved Matters Permissions	Total Outline Permissions	Total Prior Approvals without HRA Approval	Total Prior Approvals with HRA Approval
2021/22	809	461	124	211	13
2022/23	192	60	83	34	15
2023/24	689	274	381	28	6

Table 3 - Progress of Planning Permissions 2021-2024

Year	Total Dwellings Permitted	App Reference	Permission Date	No. of Dwellings Expired before 1 Apr 24/ About to Expire	No. of Dwellings completed before 1 Apr 24	No. of Dwellings Included in first 5 Years of Trajectory 2024/2029	No. of dwellings included in Years 6-17 of 2029 - 2040 Trajectory	Comment
Key Individual Permissions (10 dwellings +)								
2021/22								
1. Kilnwood Vale Sub Phase 6A	168	DC/20/2223/REM	25-May-21	0	152	16	0	Site Visit April 2024. Only 16 dwellings left to complete on site.
2. Identilam Plc Faygate Business Centre Faygate	12	DC/21/0890/PA30	22-Jul-21	0	12	0	0	Site Visit April 2024. All 12 dwellings complete.
3. St Marks Court Chart Way Horsham	148	DC/21/1343/PA30	26-Jul-21	148	0	0	0	Development must be completed within 3 years starting with prior approval date. That date is 26 July 2024. Prior Approval will lapse on 26 July 2024.
4. Rascals Farm Shipley Road Southwater	96	DC/20/0695/OUT	02-Aug-21	0	0	96	0	Allowed on appeal; Reserved matters application for 96 dwellings DC/24/0249/REM validated 21/2/2024. Expect all 96 dwellings to be completed between 24-29.
5. Crosby Farm, (Land North of Slinfold Cricket Club) Lyons Road Slinfold	24	DC/21/0498/FUL	27-Aug-21	0	24	0	0	Neighbourhood Plan Site. All 24 dwellings complete at 1 April 24. Alternative outline application (DC/19/1386/OUT) allowed on appeal 2 June 2021.
6. Phase 1B (RM Area 2) Land North of Horsham	197	DC/21/0066/REM	22-Sep-21	0	0	197	0	Total reserved matters permissions at 1 April 2024 = 390. Completions as at 1 April 2024 = 113 Total Commitments for 24-29 = 277. This is split between 80 for

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									DC/20/2047/REM (193 dwellings , granted 29 Jan 21) and DC/21/0066/REM (197 dwellings , granted 22 Sep 21)
7. 51 Barclays House Bishopric Horsham	24	DC/21/1356/PA3O	08-Oct-21	24	0	0	0	0	Prior approval must be completed 8 October 24. As at July 24, no pre-commencement conditions have been discharged. The HRA application (HRA /21 /0003) was refused on 17 May 2022. Prior approval is likely to lapse on 8 October 2024.
8. Rambledown House West Chilts	11	DC/21/0279/FUL	06-Jan-22	0	11	0	0	0	As at 1 April 2024, all 11 dwellings were complete.
9. The Cobblers Hayes Lane Slinfold	12	DC/20/2578/FUL	14-Mar-22	0	0	12	0	0	Net completions for 22/23 was -13. Development had commenced on site at 1 April 24. It is expected that all 12 dwellings will be completed 24-29
2022/23									
1. Graylands Mnor Graylands Estate Langhurst Wood Road	10	DC/22/1191/PA3MA	17-Aug-22	0	10	0	0	0	All 10 dwellings completed at 1 April 2024.
2. Smith and Western 37 North Parade Horsham	20	DC/22/1191/PA3MA	24-Aug-22	0	0	20	0	0	Development had commenced on site at 1 April 24. Expect all 20 dwellings to be completed between 24-29.
3. Land at Duckmoor East of Billingshurst	83	DC/20/2607/OUT	18-Jan-23	0	0	83	0	0	Reserved matters application for 83 dwellings validated 16 May 2024 (DC/24/0768/REM).
2023/24									
1. Land at New Place Farm Pulborough	170	DC/21/2321/OUT	07-Jul-23	0	0	0	170	0	In terms of progress, PreApp (PE/24/0081) for "Demolition of existing structures and the redevelopment of the site with a residential development scheme up to 170 dwellings" was validated on 2 May 2024.
2. Sussexdown Washington Road Storrington	12	DC/22/2372/FUL	28-Jul-23	0	0	12	0	0	DC/24/0543/REMCON - variation of condition 1 - to demolish and rebuild Sussexdown House. Permitted 8 July 2024. Discharge of Condition

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									DISC/24/0157 approval of details for conditions 3,4,7,8 and 9 validated 19 June 2024. Net increase of 22 C2 units, = 12 units.
3. Land at Sandygate Lane, Lower Beeding	22	DC/22/0708/FUL	31-Aug-23	0	0	22	0		Subsequent to permission DC/22/0708, permission has been granted for discharge of conditions 4 and 10 (DISC/23/0199) on 6/10/23 and Water Neutrality Strategy S106/23/0019 20 March 2024. Expect to commence in next 12 months. All 22 dwellings expected to be completed 2024-2029.
4. Chanctonbury Nurseries, Rectory Lane, Ashington	74	DC/22/0372/FUL	04-Sep-23	0	0	74	0		Subsequent to permission, discharge of conditions applications submitted: 1) DISC/24/0121 approval of conditions 5, 11 and 16 2) DISC/24/0129 approval of conditions 7 and 14; 3) DISC/24/0135 approval of conditions 3,4,6 and 8. All validated 6 June 2024. Expect all 74 dwellings to be completed 2024-2029.
5. Land at Sumners Ponds, Chapel Road, Barns Green	32	DC/21/2697/FUL	06-Oct-23	0	0	32	0		At 1 April 2024, developers have commenced on site. Expected that all 32 dwellings will be built between 24-29.
6. Ravenscroft Allotments, Storrington	78	DC/21/2086/OUT	06-Oct-23	0	0	0	78		No reserved matters submitted as at 9 July 2024.
7 Wellcross Farm Five Oaks Road Slinfold	26	DC/22/1503/REM	20-Nov-23	0	0	26	0		47 units of C2 = 26 C3 dwellings. Have commenced on site as at 1 April 2024. Expect all 26 dwellings of this phase to be completed 24-29.
8 Roundstone Park Worthing Road Southwater	42	DC/22/0096/FUL	20-Feb-24	0	0	42	0		Have commenced on site at 1 April 2024. Expect all 42 dwellings to be completed 24-29.
9 Lower Broadbridge Farm, Broadbridge Heath	133	DC/22/1052/OUT	07-Mar-24	0	0	0	133		No progress since outline permission granted.