



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 8: Housing

Issue 3

November 2024

Contents

Issue 3: Whether the other housing policies are justified, effective, consistent with national policy and positively prepared?	3
Question 1: Is Strategic Policy 38: Meeting Local Housing Needs sound? Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?	3
Need for different types and sizes of homes.....	3
Self-build and custom-build homes.....	4
Other types of housing need	4
Question 2: Is Strategic Policy 39: Affordable Housing sound?.....	4
a) Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment? .	4
Need for affordable housing	4
Split in affordable housing tenure	6
Viability - overview	6
Viability – specialist housing for older people	7
Viability – uncertainty around costs	7
b) Is the approach to First Homes consistent with national policy?	8
c) Is criterion 5 effective?	9
d) Would the needs identified be met?	9
Question 3: Is Policy 40: Improving Housing Standards in the District sound?.....	11
a) Having regard to the PPG (Ref ID: 63-009-20190626) what is the requirement for accessible and adaptable housing in the District and how would the Council’s approach meet it or not?.....	11
b) In line with the PPG (Ref ID: 56-020-20150327), what is the evidence which establishes the need for internal space standards in the District?	13
Question 4: Is Policy 41: Rural Exception Homes sound?.....	14
a) Is it clear what is meant by “In exceptional circumstances” and “small scale”?	14
Question 5: Is Policy 42: Retirement Housing and Specialist Care sound?.....	15
Question 6: Is Policy 44: Rural Workers Accommodation sound?.....	16
Question 7: Is Policy 45: Replacement Dwellings and House Extensions in the Countryside sound?	18
Question 8: Is Policy 46: Ancillary Accommodation sound?	18
Appendix 1	19
Supporting Local Evidence – Space Standards.....	19

Issue 3: Whether the other housing policies are justified, effective, consistent with national policy and positively prepared?

Question 1: Is Strategic Policy 38: Meeting Local Housing Needs sound? Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?

1. Yes, Strategic Policy 38 is considered sound and consistent with relevant evidence, including the **Strategic Housing Market Assessment (SHMA) (H01)** and a subsequent update to that work. It also provides a strong mechanism to deliver on the Plan's Spatial Objective 10, to *"Provide a range of housing developments across the District that: deliver the target number of new homes; respect the scale of existing places; and deliver a range of housing sizes and types to meet the needs of young people, families and older people and provide of a range of affordable housing"*.
2. The **NPPF** states (**paragraph 62**) that, within the context of housing needs being assessed using the standard method, *"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"*.
3. The policy closely reflects the NPPF requirements. It is underpinned by the **Northern West Sussex Strategic Housing Market Assessment (SHMA) (H01)**. This was commissioned jointly by the Council together with Crawley Borough Council, closely involved Mid Sussex District Council, and was published in 2019. As well as looking at housing market drivers informing policy, it also considered in detail the housing needs as referenced in the NPPF.

Need for different types and sizes of homes

4. It is firstly important to note that Strategic Policy 38 states that the mix of housing sizes and types to meet needs where it is in line with evidence from the latest Strategic Housing Market Assessment **or any subsequent updates**. It states that a Made or referendum-stage neighbourhood plan may provide an alternative mix, which reflects that a neighborhood plan that has passed examination will have a sound local evidence base to support the relevant policy. Also in the Plan, Table 9 gives an appropriate strategic mix of home sizes based on tenure: this replicates the dwelling mix recommendations in the SHMA **paragraphs 11.25, 11.29 and 11.31**. Paragraph 10.30 in the Plan clarifies that if evidence on the dwelling mix is updated during the Plan period, the most recent evidence base should be used.
5. In recommending a strategic housing mix for new developments, the SHMA used 2011 Census data as a baseline, but drew on analysis of the needs of the different groups referenced in the SHMA (younger people, family households, older persons, and those with disabilities).
6. **Table 67 in the SHMA** shows that 3-bedroom properties were the most prevalent in Horsham District. Looking at owner-occupied housing (the majority of the stock), the District displays a larger proportion of 4+ bedroom properties compared with other areas, but has a low proportion of 1-bed properties. There are marked differences between the owner-occupied, social/affordable rented and private rented housing stocks, for example the latter has a much higher proportion of 1-bedroom homes (36% compared with 4% of owner-occupied homes and 24% of private rented homes).
7. The SHMA employs a model that starts with the current profile of housing in terms of size (bedrooms) and tenure. By using demographic projections, it is possible to see which age groups are expected to change in number, and by how much. On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to work out what the profile of housing needed over the assessment period to 2039. The SHMA (**paragraphs 11.5 to 11.16**) sets out the methodology for this.

8. Following the modelling exercise, the SHMA considered other factors. For rented affordable homes, **paragraph 11.24** notes that in Horsham district, there has been limited delivery of larger homes, and that larger housing units also have a relatively low turnover of occupants. As a result, whilst the number of households coming forward for 4+-bedroom homes is typically quite small, the ability for these needs to be met is even more limited. Therefore, the proportion of 1-bedroom homes is slightly reduced from the model outputs, with a commensurate increase in 4+-bedroom homes. This also recognises the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households; together with the limited flexibility which 1-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.
9. In respect of affordable home ownership, the SHMA (**paragraph 11.29**) recommends a mix more closely aligned with the model outputs. It recommends that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. The Council agrees with this approach given that low-cost home ownership housing (the most common being shared ownership) most usually act as 'starter homes' for first-time buyers. The proposed mix recognises that these tend to be younger (and therefore smaller) households, but also facilitates provisions of some larger homes for low-cost ownership to provide opportunity for larger families unable to afford market prices.
10. For the market sector, the SMHA recommends a balance of dwellings which takes account of both the demand for homes and the changing demographic profile (**paragraph 11.31**). This sees a need for a greater proportion of larger homes (3+ bedrooms) compared with other tenure groups, but still provides for 35% of new market homes to be 2- or 1-bedroom properties.
11. Paragraph 10.32 of the Plan recognises that future development should respond to local character and local needs, for example as evidenced by a local housing needs assessment prepared specifically for a parish or ward, or in a neighbourhood plan that has passed examination. The policy also allows factors including the established character and density of the neighbourhood, the viability of the scheme, and robust local housing needs assessments to be material in decision making. This is in line with the SHMA recommendation in **paragraph 11.32** which flags the significance of the existing housing mix at a neighbourhood or settlement level, and also the location and nature of the development site.

[Self-build and custom-build homes](#)

12. This aspect of meeting local housing need is dealt with in **the Council's response to Matter 8, Issue 2, Question 7**.

[Other types of housing need](#)

13. Paragraph 10.29 of the Plan states that there is a particular need to meet the housing needs of an increasingly elderly population, and a continuing need to provide homes suitable for specialist needs. As these needs are addressed in Policies 40 and 42, they are dealt with under Questions 3 and 5 below.

Question 2: Is Strategic Policy 39: Affordable Housing sound?

14. The policy is considered sound for the reasons set out below.

[a\) Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?](#)

[Need for affordable housing](#)

15. The need for affordable housing in Horsham District was first assessed in the **Northern West Sussex SHMA (H01)**. However, for Horsham District specifically, aspects of the SHMA have been updated as part of the **Horsham Social Rented and First Homes Study (the SRFHS) (H10)**, which was undertaken by Iceni Projects on behalf of the Council. Specifically, it updates the affordable housing need, updates evidence on the mix of unit sizes and affordable tenures, and updates figures on the

need for older specialist older people's housing and the affordable need within that. Overall, this study (in **paragraph 10**) identifies a notable need for affordable housing, and that provision of new affordable housing is an important and pressing issue in the area. Whilst noting that the amount of affordable housing delivered will be limited to the amount that can viably be provided, it recommends that affordable housing delivery should be maximised where opportunities arise.

16. The SRFHS has used updated data compared with the SHMA to assess the overall need for affordable housing, then looked specifically at individual tenures within that. **Paragraph 2.2** states that the method for studying the need for affordable housing has been enshrined in Government practice guidance for many years, with an established approach to look at the number of households who are unable to afford market housing (to either rent or buy), i.e. those in 'need', which includes those who aspire to own their home but cannot afford to do so. This is worked out by looking at:
 - Current affordable housing need,
 - Projected newly forming households in need,
 - Existing households falling into need, and
 - The supply of affordable housing (which is 'netted off' the gross need figure).
17. One element of assessing need is the comparison of local house prices and private rents with local household incomes. For house prices, Icen used Land Registry data, ONS data and online research of the residential property sale market to estimate lower quartile prices and rents for a range of dwelling sizes (categorized by number of bedrooms) (SRFHS **paragraphs 2.11 to 2.14**). For private rents, data was obtained from ONS modelled income estimates with additional data from the English Housing Survey (EHS) (**paragraphs 2.15 to 2.16**).
18. Next, affordability thresholds were established, that is, working out how much income would be required to be able to firstly rent in the private sector, and secondly to buy a suitable market home. The nuances of this are explained in the SRFHS **paragraphs 2.17 to 2.23**. In simplified terms, there is a calculated assumption that more than 30% of gross lower quartile pay being spent on private rent represents a theoretical need for affordable housing, with the threshold for open market owner-occupation based on being able to afford a 10% deposit and with a mortgage of 4.5 times their salary, applied to lower quartile house prices.
19. The SRFHS goes on to use various data sources to work out the net annual need for affordable housing based on the four elements listed in paragraph 16 of this Statement, following the standard process. SRFHS **paragraphs 2.24 to 2.49** address the net need for affordable/social rented homes, which leads to a calculated figure of **492 rented affordable homes (net) per year**. **Paragraphs 2.50 to 2.66** then sets this in the context of overall standard method housing need, noting complexities such as the calculated need including 'in-need' households already currently housed, and not accounting for homes vacated by such households being potentially available to another in-need household. In short, the report authors highlight that whilst there is little justification for directly linking the need for affordable housing to the overall housing need (as calculated using the standard method), it is nevertheless clear that provision of rented affordable housing is a pressing issue across the District.
20. The SRFHS then looked at the need for affordable home ownership. Put simply, this was calculated by estimating the number of households falling within a gap of being able to afford to rent privately, but struggling to afford to buy suitable properties on the open market (and applying this principle to both existing households and newly forming households over the plan period). It also accounts for some of these households moving into resale affordable home ownership homes. The theoretical need is estimated at **386 new affordable home ownership homes (net) per year**, however the report also points out that this need figure could be much less given a significant number of households falling into this category of need do, in reality, manage to buy on the homes on the open market which fall below the lower quartile of properties by price. The SRFHS therefore underpins the

Council's argument that there is a very significant need for new affordable homes in the District, and especially for rented affordable tenures.

[Split in affordable housing tenure](#)

21. The SHMA evidence supports a split of either 75/25% or 70/30% split between rented affordable and low cost home ownership in Horsham District. **Paragraph 7.63 of the SHMA** explains that the split of affordable housing need as concluded by the modelled projected data is 68% rented against 32% low-cost ownership. It further notes that if a 75/25 split were adopted, this would deliver more rented housing to better meet the needs of those in greatest need. However, a higher proportion of low-cost housing (i.e. a 70/30 split) could potentially support either higher affordable housing provision or greater contributions to wider infrastructure provision. Either approach would be supported by the evidence.
22. In response, the Council is proposing a 70/30 split. This carries forward the extant approach as set out in the **Horsham District Planning Framework (HDC05) paragraph 6.8**, and is favoured because it allows some flexibility for supporting overall delivery of affordable housing. It is known that shared ownership housing is critical to affordable housing providers' delivery models as it brings in capital that cross-subsidises the delivery of rented affordable housing.
23. The Council has also very carefully considered the respective roles of social rented homes and affordable rented homes. Social Rented is generally recognised as better able to meet the needs of low-income households, whilst Affordable Rented has until recently been the Government's favoured form of rented affordable housing.
24. As such, the Council commissioned the **SRFHS (H10)** with an aim of identifying the likely need for specifically social rented housing provision. The report is clear that it is far from straightforward to separate the need for social rented versus affordable rented need given there is significant overlap between the two.
25. Nevertheless, analysis of incomes against current rent levels (summarised in **paragraphs 5.9 to 5.11** and **Table 5.3** of the SRFHS) showed that only 27% of households unable to afford market rents would be able to fund affordable rented accommodation without claiming benefits. **Paragraph 5.12** explains that the likelihood of households falling into need are in fact entitled to benefits, so a higher proportion of affordable rented housing might be appropriate. The SRFHS (**paragraphs 5.14 to 5.15**) went on to test the affordability of different levels of discount applied for affordable rent (from 20% to 40% discount on market rents), which strongly indicated that where affordable rent is offered, a standard discount of 20% may not be enough to ensure some types of affordable rent affordable to some households, even where that household is claiming the maximum available welfare benefit (which is determined by the Local Housing Allowance). The SRFHS concludes that the Council should aim to secure social rented housing as a starting point in Section 106 negotiations, and that for affordable rented, it would be reasonable to seek a higher level of discount on market rents than 20%.
26. In conclusion, the Council's evidence indicates a need for a high proportion of rented affordable housing within overall delivery of affordable housing. However, Strategic Policy 39 must recognise the implications for delivery in setting too high a bar. For example, there is a strong indication from the social housing sector (as fed back via the Council's Housing officers) that it is not currently feasible to deliver social rented housing for viability and feasibility reasons, and the sector has further been clear on the importance of shared ownership homes for wider affordable housing delivery. Whilst a recent change of government has raised the prospect of more funding for social rented housing, there is as yet no certainty of what this might mean in practical terms, and this may fall outside of what can be achieved through local planning policy. The policy strikes a balance by stating a clear preference for social rented housing, but accepting there is not the evidence to support insistence on this.

[Viability - overview](#)

27. It is recognised that ensuring policies can be viably delivered is an important aspect of soundness. The **Horsham Local Plan Viability Assessment (H12)** tested a range of site and development

typologies against varying levels of affordable housing provision and using justified standard assumptions on matters such as existing land value, gross development values, costs of planning and construction, and profit margin. A more bespoke approach was taken for the strategic sites that had been considered at the Regulation 18 stage of plan-making and were still being promoted for this round of plan-making.

28. The testing of non-strategic greenfield sites showed that **the majority of the non-strategic sites are viable whilst delivering 45% affordable housing on-site. Brownfield sites, on the other hand, can be viable with 10% affordable housing.** Typologies for self-contained older persons' accommodation on greenfield sites and build-to-rent developments were also tested, with bespoke targets recommended. The recommendations of the Viability Assessment were accepted in full and were carried through into the policy.

[Viability – specialist housing for older people](#)

29. It is noted that representations have been made that request policy clarification on whether **Policy 39(d)** (which sets a target for specialist older peoples' housing) applies to only greenfield sites, or also to brownfield sites. It has been further argued that it would not be viable to apply the 30% target to such developments on brownfield land. In response, the Council highlights **paragraphs 7.30 to 7.34, and Table 7-8, of the viability assessment (H12)**. This shows that the older persons' accommodation greenfield typology is viable, and that the brownfield typology has marginal viability.
30. In responding, the Council takes account of the recommendation in **paragraphs 9.3 to 9.7 of the viability assessment (H12)**. This suggests the Council may need to be flexible in its approach when asking for older person's housing proposals on previously developed sites, but unlike for standard residential on brownfield, does not suggest a lower target. As noted in the Executive Summary (paragraph ES 40), this type of development is expected to be delivered on greenfield sites in any event. Therefore, it remains the Council's view that the 30% target should apply to both greenfield and brownfield sites. This ensures consistency of approach, with due flexibility allowed for in the approach to policy implementation set out in paragraph 10.46 of the Plan.
31. The Council has also taken note of representations that have questioned the viability specifically of extra-care housing, and as a result undertaken further viability work (see **Horsham Local Plan Viability Assessment Addendum - HDC15**). This has led the Council to suggest modifications to Strategic Policies 39 and 42 (**Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024, SM43 and SM44**) as explained further in the response below to Question 5 (see paragraph 83).

[Viability – uncertainty around costs](#)

32. A further key point raised in representations was that 'high' targets set out in the policy take insufficient account of uncertainties over various factors such as economic fluctuations, rising construction prices, water neutrality, etc. The overall thrust of these seems to be that insufficient buffers have been applied when setting the targets to allow for changing circumstances, and therefore the targets should be lower.
33. In response, the Council firstly notes the **Planning Practice Guidance (PPG) principle (Chapter: Viability, Ref ID: 10-010-20180724)** that *"In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission"*. The overall intention of the PPG is that the inputs into viability assessments should be based on the time at which the assessment is undertaken. This reflects that changes in costs and the market may result in improved viability (for example arising from increases in property values) or tightened viability (such as increases in build costs). As both have been observed in recent years, it would be wrong to speculate which is more likely in future. The Viability Assessment provides full justification for the recommendations made, acknowledges the uncertainties on both costs and values, and includes a contextual **Property Market Report (Appendix 6)** to ensure transparency of context.

[b\) Is the approach to First Homes consistent with national policy?](#)

34. The previous Government's First Homes policy was introduced in May 2021 by way of a Written Ministerial Statement (WMS) made on 24 May 2021. The NPPF was not updated to reflect the WMS, and the September 2023 version therefore does not contain any specific policy on First Homes. Nevertheless, the Council recognises that WMSs have equivalent weight to the NPPF, and further recognises that **Planning Practice Guidance** was updated to include comprehensive guidance on the application of First Homes policy (**Chapter: First Homes, Ref ID: 70-001-20210524 to 70-029-20210524**).
35. The PPG expects local plans to require 25% of all affordable housing units secured through developer contributions to be First Homes (**Ref ID: 70-012-20210524 and 70-013-20210524**). Compared to this, Strategic Policy 39 requires up to 30% of affordable homes provided on a qualifying development site to be low-cost home ownership, which may include shared ownership and First Homes. Whilst the policy does not therefore specifically require a minimum 25% of provision to be First Homes, provision of such would comply with the policy.
36. The Council has, in light of local evidence, consciously chosen to not require a minimum 25% proportion as First Homes. The following paragraphs set out the reasoning for this.
37. Firstly, the **Social Rented and First Homes Study (SRFHS) (H10)** considers affordable home ownership in terms of need and also delivery. In **paragraphs 2.93 and 2.94**, it notes that the Government's policy of firstly requiring 10% of all new housing to be low-cost home ownership, and secondly that a minimum 25% of the affordable element must also be First Homes, to not necessarily be the best solution for Horsham District. This is because there is a clear need for additional **rented** housing, and indeed there is justification for prioritising social rented housing. Therefore providing the requisite low-cost ownership would prejudice the ability to meet the needs of the specific group requiring rented accommodation and, as a result, a lower percentage may be justified. The report specifically states that *"it is clear from the analysis that in principle, the Council would be justified in challenging the percentage requirement owing to the significant need for rented affordable housing. It is also possible that provision of First Homes could squeeze out other forms of AHO such as shared ownership, although it is likely that there will still be a role for this type of housing given typically lower deposit requirements."* The Council also understands (as fed back via the Council's Housing officers) that there is very little interest in delivering First Homes from either developers or social housing providers, as unlike shared ownership homes they do not provide rental income and are therefore a less valuable asset.
38. Secondly, the **SRFHS** finds inherent problems in the delivery of First Homes as envisaged by the national policy framework. **Paragraph 6.6** explains that the problem with having a percentage discount is that it is possible in some locations or types of property that such a discount still means that the discounted housing is more expensive than that typically available in the open market. This is often the case as new build housing itself attracts a premium. Indeed, the analysis, as summarised in **paragraph 6.14**, shows that the capped (maximum) price of £250,000 on any First Home could, for larger properties, require a greater discount from the market value than is allowed for by the First Homes policy. The report states that given there is a cap of £250,000 on the purchase price, it may be difficult even for 3+-bedroom homes to be provided as First Homes (**Table 6.2** illustrates this). Therefore, most First Homes would have to be 2-bedroom with a 40% discount applied. Clearly this would be at odds with achieving a mix of unit sizes to meet projected future household needs, as is sought in the Plan, Strategic Policy 38: Meeting Local Housing Needs.
39. Thirdly, whilst not a determining factor for the purposes of this Plan, there has been a draft consultation changes to the national planning framework, thereby setting a clear direction of travel. In

Chapter 6 of the **Proposed Reforms to the National Planning Policy Framework and other changes to the planning system (July 2024)**¹, paragraph 5 includes the statement:

*“We are clear that we must take steps to boost home ownership and the actions set out in this document will do just that – but the prescriptive prioritisation of these particular types of affordable housing in existing policy is not the right approach. It can force unhelpful trade-offs, especially in areas where, for example, Social Rent and Affordable Rent are most needed. For this reason, **we propose removing the requirement to deliver at least 10% of the total number of homes on major sites as affordable home ownership**, as set out in paragraph 66 of the current NPPF. **We also propose removing the requirement that a minimum of 25% of affordable housing units secured through developer contributions should be First Homes**, as set out in the ‘Affordable Homes Update’ Written Ministerial Statement of 24 May 2021.”*

40. As it is the clear intention of Government to remove the First Homes minimum requirement from national policy, it would seem short-sighted to now include this requirement in the Plan.

c) Is criterion 5 effective?

41. The Council notes representations have questioned the effectiveness of criterion 5 of the policy. In the context of the default requirement being for on-site provision, the criterion is designed to allow, in exceptional circumstances relating to viability, some flexibility in this. It allows the provision of off-site provision or equivalent financial contributions.
42. The policy criterion relates specifically to the exceptional provision of affordable housing off-site. It is intended to be read alongside the supporting text. Paragraph 10.46 in the Plan expands on why, exceptionally, abnormal site costs might impact a site’s ability to fully comply with the policy, and if so the alternative ways in which provision may be made. The supporting text recognises the potential role of off-site provision, but also recognises that in some instances, the tenures, unit sizes or even overall provision may need to depart from the policy requirements.
43. The Council has thus sought to ensure that the policy does not invite reductions in affordable housing provision as a matter of course. In other words, the Council wishes to be very clear that any overall reduction in affordable housing would be a departure from policy, to provide certainty to developers and the public. This is why the policy does not, in its own right, ‘allow’ any reduction in the overall amount.
44. On the other hand, it is judged reasonable to provide some steer in the supporting text should a departure from policy be necessary for robustly proven viability reasons. The supporting text therefore expands on these matters.
45. The Council further recognises that should financial contributions in lieu of on-site or physical off-site provision be accepted, there needs to be a mechanism for calculating such contributions. It is common practice to set out the details of such matters in a Supplementary Planning Document (SPD). The Council has such an SPD published on its website – the Planning Obligations and Affordable Housing SPD, which was adopted in September 2017. Subject to the outcome of the current national planning reforms, it may be appropriate to update this in some form. The Council would also be open to a modification being made to the Plan to directly cross-refer to the SPD or any other emerging form of guidance in the supporting text to Strategic Policy 39.

d) Would the needs identified be met?

46. In common with many other areas of the region and the country, the assessed need for affordable housing is very high. The Horsham total net need figure for affordable/social rented housing is **492**

¹ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-3--planning-for-the-homes-we-need>

per annum (or 367 per annum if one excludes existing households) (**Social Rented and First Homes Study (SRFHS) (H10)**, Table 2.13). The need for affordable home ownership housing is more difficult to calculate, but is estimated at **386 per annum** (SRFHS, **Table 2.15**). It is clear that even when only including delivery of rented tenancy affordable housing, over 50% of all new housing supply that would be needed to meet the standard method annual need of 917 dpa would have to be rented affordable to meet that element of need. The proportion would be even greater if affordable home ownership need was included. This is clearly not a viable or realistic prospect.

47. The Council’s evidence for the overall housing target proposed is set out in the responses to **Matter 8, Issue 1** and **Matter 8, Issue 2** in particular. In summary, past and future delivery has been severely constrained by the impact of water neutrality, meaning that the standard method housing figure cannot, over the Plan period, be met. Furthermore, the SRFHS (**paragraph 2.65**) warns that there is no justification for trying to link the need for affordable housing to the overall housing need as the two do not measure the same thing.
48. Table 1 below gives a summary of the potential yields of affordable housing based on site allocations being made, together with larger site commitments, over the Plan period (as set out in Strategic Policy 37 of the Plan). These should be seen as theoretical and indicative, are not necessarily what has been approved where sites have gained planning permission, and do not include potential other sources of affordable housing such as larger windfall sites within built-up area boundaries and any fully social housing schemes brought forward by social housing providers or the Council. Also, some very small site allocations will fall below the nationally set threshold for affordable housing provision.

Table 1: Theoretical affordable housing yields (proposed allocations and currently allocated strategic sites)

Source of housing (from the Housing Topic Paper HDC02)	Total housing yield	Of which affordable housing
West of Ifield (strategic site)	1,600	640 (40%)
North West of Southwater (strategic site)	735	257 (35%)
East of Billingshurst (strategic site)	650	227 (35%)
Smaller site allocations	1,795	807 (45%)
Currently allocated strategic sites (including 60 additional dwellings arising from Land North of Horsham intensification)	3,735	1,307 (35%)*
TOTAL	8,092	3,238

*This represents provision on the basis of a policy-compliant level of affordable housing provision: in reality, the figure will be lower as some strategic sites are delivering below that level.

49. It can be seen that the theoretical total represents an annualised average of **190** affordable homes per annum from new development (i.e. 3,238 / 17 years). This is well short of the need outlined in paragraph 46. This is an inevitable outcome of the lack of housing affordability in the District, which has in turn meant a very high assessed need for affordable housing. To try to meet this need in whole would require such high levels of housing delivery that environmental impacts would be severe, and in any case unlikely to be achieved due to the ongoing impact of water neutrality (see **Topic Paper 2: Housing Supply (HDC03)** and the housing market’s limited capacity (see the **Horsham Housing Delivery Study (H03)** and **Update (H04)**).

Question 3: Is Policy 40: Improving Housing Standards in the District sound?

50. **Planning Practice Guidance (PPG)** includes a section titled 'Housing: optional technical standards'. This states (**Ref ID: 56-002-20160519**) that local planning authorities have the option to set additional technical requirements exceeding the minimum standards set by Building Regulations.

[a\) Having regard to the PPG \(Ref ID: 63-009-20190626\) what is the requirement for accessible and adaptable housing in the District and how would the Council's approach meet it or not?](#)

51. The Council considers there to be strong evidence of a requirement for accessible and adaptable housing in the District. **Planning Practice Guidance (PPG)** states (**Ref ID: 63-001-20190626**): *"The need to provide housing for older people is critical... Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking."* It further states (**Ref ID: 63-002-20190626**): *"The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives... Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives... An ageing population will see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime."*
52. PPG then advises (**Ref ID: 63-006-20190626**) that *"plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people"*. PPG states (**Ref ID: 63-009-20190626**): that where an identified need exists, plans are expected to make use of the Optional Technical Housing Standards² to help bring forward an adequate supply of accessible housing. In doing so, planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:
- M4(1) Category 1: Visitable dwellings (the minimum standards that applies where no planning condition is given unless a plan sets a higher minimum requirements)
 - M4(2) Category 2: Accessible and adaptable dwellings
 - M4(3) Category 3: Wheelchair user dwellings³

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.

53. **PPG (Ref ID: 63-004-20190626)** encourages plan-makers to draw from evidence provided in Census data, and from projections of population and households by age group. The 2011 Census found that of the 131,301 people in the District, 7,857 people (or 5.98%) were living with a condition that limited their day-to-day activities 'a lot' and a further 11,550 (or 8.8%) were limited 'a little'. This represents just under 15% of the District's population living with a long-term health problem or disability.
54. Further Government-held data is published as the **Local Authority Housing Statistics Data Returns**⁴. Extracts of this data from Horsham District is presented as Table 2 below, along with the Council's calculation of the percentage of all households on the housing register who need to move house due to medical or disability reasons.

² <https://www.gov.uk/guidance/housing-optional-technical-standards>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

⁴ <https://www.gov.uk/government/collections/local-authority-housing-data>

Table 2: Data extracts for Horsham District Council housing register returns (from Local Authority Housing Statistics Data Returns⁴)

Year	Households on the housing waiting list	Households who need to move on medical or welfare grounds relating to a disability	(B) as a percentage of (A)
2017-18	592	99	16.7%
2018-19	582	130	22.3%
2019-20	675	151	22.3%
2020-21	782	193	24.7%
2021-22	705	163	23.1%
2022-23	740	186	25.1%

55. This data shows that in recent years there has been an overall rise in the number of people needing to move on medical or welfare grounds relating to disability. The figure sits at its highest in the most recent set of returns from the Council in 2022-23.
56. It is also relevant that Horsham District has seen a significant increase in its population of older people, with an increase of 31.0% in people aged 65 years and over between the 2011 and 2021 Census. This is much higher than the increase for other age groups in the District, and higher than the increase across England of 20.1% (Office for National Statistics⁵).
57. Elements of the **Strategic Housing Market Assessment (SHMA) (H01)** have been updated by the **Horsham Social Rented and Forst Homes Study (SRFHS) (H10)**. This provides more fine-grained local evidence of need for housing suitable for older people and for disabled people. **Paragraph 3.5** in the SRFHS reports that the number of people over the age of 65 is expected to grow by 15,100 persons in the District between 2021 and 2038, which accounts for 87% of the total projected increase. **Table 3.3** in the SRFHS shows that the proportion of households in the District with at least one person with a long-term health problem or disability (LTHPD) in 2011 was 27.6% and Table 3.4 indicates that between 2021 and 2038, the projected increase of people living with dementia will increase by 60%, and the increase of people with mobility problems will be 53.3%.
58. The statistics reaffirm conclusions in the SHMA, which in **paragraphs 1.17, 10.20 and 13.23** recommends that planning policies should require new homes to be delivered to the Part M4(2) accessible and adaptable home standards, subject to viability testing.
59. Based on national data, the SHMA suggests there is a need for around 800 wheelchair user homes in Horsham in the period 2019 to 2039 (**SHMA Table 66**) (around 4% of the total housing need in Horsham District). The SHMA (**paragraphs 1.17 and 13.27**) recommends that planning policies should require 5% of dwellings on major development schemes to be delivered to wheelchair user standards, subject to viability testing.
60. Given the evidence of need outlined above, it is clear that there is significant and potentially growing need for accessible and adaptable homes. Therefore Policy 40 follows the recommendations in the SHMA: it requires all new dwellings to meet the Optional Standards for Accessible and Adaptable Dwellings as set out in the Building Regulations Approved Document M4(2) (or any subsequent

⁵ <https://www.ons.gov.uk/visualisations/censuspopulationchange/>

update), and require a minimum 5% of dwellings on sites of 20 or more homes provided as affordable housing to meet the Optional Standards for Wheelchair User Dwellings as set out in Approved Document M4(3) (or any subsequent update). Referring back to paragraph 59, it is acknowledged that to meet all of the theoretical need for wheelchair users, the 5% would need to apply to all new dwellings and not just affordable dwellings. However, **Planning Practice Guidance (PPG) Chapter: Housing: optional technical standards** states (Ref ID: 56-009-20150327) that “*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.*” Although the approach in the Plan falls short of meeting identified need for wheelchair users, it also takes into account that all new dwellings, irrespective of whether market or affordable, will be capable of adaptation to wheelchair user standard in future.

61. **PPG (Ref ID: 63-009-20190626)** requires evidence of viability in respect of accessible housing. The impact of the extra cost associated with providing housing to comply with Approved Document Part M in line with the policy has therefore been assessed as part of the **Local Plan Viability Assessment (H12)**. **Table 4-1** of the viability assessment records that the uplift applied for M4(2) dwellings (adaptable dwellings, to apply to all new dwellings) is £1,400 per dwelling, and the uplift for M4(3) dwellings (fully wheelchair accessible), which is applied to 5% of affordable homes on sites of 20 or more units, is £10,307 per dwelling.

[b\) In line with the PPG \(Ref ID: 56-020-20150327\), what is the evidence which establishes the need for internal space standards in the District?](#)

62. **PPG Chapter: Housing: Optional Technical Standards (Ref ID: 56-020-20150327 to 56-023-20160519)** expects plan-makers to provide justification for requiring internal space policies in line with the Nationally Described Space Standard (NDSS) which is set out in **Statutory Guidance: Technical Housing Standards – nationally prescribed space standard**⁶. Justification should be based on need and viability. Account should also be taken of timing.
63. In terms of need, research has been undertaken on the size and type of dwellings currently being built in the area and this is set out in **Appendix 1** to this statement. This research provides strong evidence to suggest that dwellings being delivered in the District do not meet the recommended Gross Internal Floor Area (GIA) set out in the NDSS. Of the 14 sites that were assessed 10 had GIA below the NDSS, including bedroom sizes. Of the remaining four sites, whilst the overall GIA met the NDSS, three of the sites had bedroom sizes that were below the recommended sizes set out in the NDSS. There was only one of the 14 sites assessed that provided dwellings above the NDSS, including bedroom sizes above the standard.
64. A concerning trend that was identified was that of the 14 sites assessed, 12 of the sites had bedroom sizes below the NDSS and this affected most of the schemes that were assessed. There were some instances where the additional bedroom spaces were noticeably small, for example, a 4-bed, 7-person dwelling on Land North of West End Lane in Henfield where the fourth bedroom measured just 4.94sqm, 2.56sqm below the NDSS for a single bedroom. Similarly, on the same development, a 3-bed, 4-person dwelling contained a 3rd bedroom that measured just 4.67sqm.
65. There was further evidence of some properties demonstrating unbalanced accommodation with the main bedrooms typically measuring 13-14sqm, so approximately 2sqm above the NDSS but this would often be at the expense of smaller additional bedrooms.
66. The Council considers that this desktop gathering exercise has uncovered sufficient evidence to highlight that dwellings being delivered in the District are often below the NDSS. These do not achieve quality development, and this need rectifying by means of planning policy intervention.

⁶ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

67. With regards viability, the impact of any extra cost associated with providing housing to comply with the NDSS has been assessed as part of the **Local Plan Viability Assessment (H12)**. This is confirmed in **Table 4-1** of the viability assessment.
68. Weight has also been given to the fact that within the Northern West Sussex Housing Market Area, Crawley Borough Local Plan (adopted October 2024) and Mid Sussex District Councils (adopted 2018) contain policies requiring new residential development to meet the NDSS. Adopted or emerging local plans for other neighbouring authorities – Adur Local Plan (adopted 2017), Arun Local Plan (adopted 2018), Mole Valley Local Plan (Adopted October 2024) and the emerging Chichester Local Plan – also all require new dwellings to meet the NDSS. This demonstrates a clear precedent for adopting the NDSS both within the HMA and beyond, and reassures that there is very unlikely to be any issue with deliverability or immediate transition to the standards on adoption.

Question 4: Is Policy 41: Rural Exception Homes sound?

69. Yes. **Paragraph 78 of the NPPF** states that local planning authorities should support opportunities for rural exception sites or the development of community-led-housing through Community Land Trusts. Policy 41: Rural Exception Homes has been positively prepared as the policy framework as one means of delivering affordable housing to those in the community who cannot access housing on the open market. The **Strategic Housing Market Assessment (SHMA) (HO1)** finds that Horsham has the potential for a greater level of rural exceptions sites to be delivered in the district than achieved to date (**paragraph 8.67 to 8.80**) but this is dependent on there being collaborative landowners willing to work with local communities and accept a lower land value than would typically be achieved by selling to a commercial housebuilder.

a) Is it clear what is meant by “In exceptional circumstances” and “small scale”?

70. The Council submits that these terms provide sufficient certainty. Policy 41 has been drafted on the basis that rural exception site schemes are implemented outside the normal parameters of the development plan – for example, may be on land considered ‘open countryside’ – and require particular conditions to be met before they are permitted. The term ‘exceptional circumstances’ therefore makes clear that there must be circumstances that justify a departure from normal policy requirements.
71. **Annex 2 of the NPPF** also provides a clear a definition of an ‘exception site’ as follows, which is considered to support the use of the term ‘exceptional circumstances’:
- ‘Small sites used for affordable housing in perpetuity **where sites would not normally be used for housing**. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding’. (HDC **emphasis added**.)*
72. It is considered Policy 41 is consistent with this definition and the **PPG (Ref ID: 67-009-20190722)**. The seven criteria under Policy 41 must be met for a rural exception site to be permitted. A clear majority of the resulting homes must be affordable and for people with local connections, and the affordable housing development on exception sites remain affordable in perpetuity. A local needs survey prepared by an independent body will need to be prepared to justify a rural exception site with the Council’s housing waiting list may also be useful in informing housing need as part of local need survey work. assessment of suitable sites should take place in terms of land being of an appropriate size, availability and ensuring sites would not harm other policy objectives.
73. The Council considers rural exception sites should be ‘small scale’ in nature. There is no quantification of the size of rural exception schemes in Policy 41. Rather, the term ‘small scale’ concisely conveys that proposals should be modest in terms of land-take, proportionate to the size of the community whose need it seeks to address and relate well to local character and landscape

setting. The council will consider how each proposal for a rural exception site might meet such considerations on a case-by-case basis.

Question 5: Is Policy 42: Retirement Housing and Specialist Care sound?

74. The NPPF requires plan-making authorities to assess and reflect in policy the needs of different groups in its policies. **Paragraph 62 of the NPPF** sets out that local authorities should be planning for the provision of different house types including providing retirement housing and specialist housing for older persons. **Policy 42** provides a positive framework for meeting the growing need for specialist housing for older people in the district. In addition, **Planning Practice Guidance (PPG)** requires plan making authorities to set clear policies to address those needs and includes a section 'Housing for older and disabled people' which is very clear about the need to provide for older people being critical (**Ref ID: 63-001-20190626**).
75. Paragraph 10.57 to 10.61 of the Horsham Local Plan (**SD01**) establish the context to Policy 42. PPG (**Ref ID: 63-004-20190626**) also advises that Census data and population projections by age group are valid sources of evidence. It advises that broken down tenures and types (e.g. sheltered housing, extra care housing) may need to be assessed.
76. As identified earlier in this paper, Horsham District has seen a higher increase in its population of older people compared with the national picture which has driven the need to include a bespoke policy. The **Strategic Housing Market Assessment (H01)** underpins the justification for the policy: it sets out a clear methodology which is used to estimate the need firstly for self-contained uses (which includes retirement/sheltered housing, enhanced sheltered housing and extra-care housing), and separately for residential care bedspaces (which includes both care homes and nursing homes). The work was undertaken by a specialist consultancy, Icen Projects, as such the methodology is robust and proportionate to plan-making. The SHMA was undertaken jointly with Crawley Borough Council with a common methodology used for both areas. Its fitness for purpose was confirmed in **paragraph 190 of the Crawley Borough Local Plan 2023-40 Inspector's Report (HDC07)** which states that *"there is clear evidence in the SHMA of a significant need for specialist housing for older persons, including sheltered and extra care housing and care bedspaces"*, before going on to consider how this need is addressed in the Crawley Local Plan. Elements of the SHMA were updated for Horsham District in September 2022, including with respect to the need for older people's specialist housing: this is presented in the **Horsham Social Rented Housing and First Homes Study (SRFHS) (H10)**.
77. The **SRFHS (paragraph 3.5)** has predicted that people over the age of 65 is expected to grow by 15,100 in the district between 2021 and 2038, which accounts for 87% of the total projected population increase. For persons over the age of 75, the SRFHS anticipates that there will be an increase of 9,688 persons. From the demographic projections contained within the SRFHS, it is anticipated that the largest increases in population change between 2021 and 2038 will be in the 75+ age band with a 57% increase. **Figure 3.2** in the SRFHS (page 33) shows the age bands of people with a long-term health problem or disability, and it is clear that those in the oldest age bands are more likely to fall into this category.
78. The overall picture is that, given the ageing population and higher levels of disability and health problems amongst older people there is an increased requirement for specialist housing options moving forward. The **SRFHS (text box 'Specialist Affordable Housing – Summary, page 39)** projects an estimated net additional need for 610 housing units with support (sheltered/retirement housing) in Horsham over the 2021-38 period, of which 29 would be affordable, and a need for 563 additional housing units with care (e.g. extra-care) of which 63 would be affordable. These generally fall into C3 use class. In addition, the SHMA also states there is a need for 746 residential care bedspaces in Horsham over the period 2021-38. These will usually fall in a C2 use class.
79. Policy 42 addresses this need by providing a positive and effective framework for considering proposals for retirement or specialist housing intended for older people. Whilst focused on the achievement of sustainably-located and well-functioning developments, it also allows greater flexibility than applies for standard housing. This is by virtue of criterion 1 supporting schemes within **or adjoining** built-up areas, and also criterion 2 allowing development in locations poorly related to

larger settlements, provided it's been demonstrated that alternative sites within or adjoining a defined built-up area are not available or are unsuitable.

80. The policy also recognises that these housing types are expected to come forward on the three strategic sites proposed for allocation in the plan. Strategic Policies HA1, HA2, HA3 and HA4 all make clear the requirement that strategic sites provide older people's housing. Between them, the three strategic sites are expected to yield 8,092 new homes, a proportion of which will be for older people. Given the future demand indicated by the SHMA, there is very good prospect that further sites elsewhere in the district will come forward, for example on the edge of settlements, and gain approval by virtue of the positive framework in the policy.
81. Policy 42 is complemented by Policy 40, which requires all new dwellings to be accessible dwellings, and further requires a proportion of affordable housing to be wheelchair accessible, in line with nationally described standards. This will also help to support independent living for older people, for those who require accessibility in their home without necessarily needing other on-site specialist services.
82. The **Horsham Local Plan Viability Assessment (H12)** evidences that the development of older persons' accommodation is viable on greenfield sites with all policy requirements and 30% affordable housing. The Horsham Local Plan Viability Assessment also evidences older person's accommodation is also viable on brownfield sites but viability is more marginal, however the appraisals still retain a positive residual value. There are a number of additional costs associated with this type of development which reduce viability when compared to market sale housing and hence the affordable housing requirement is lower for this type of housing as stipulated in Policy 39: Affordable Housing. Whilst there is little historic evidence of residential care homes coming forward in Horsham District on brownfield sites, should such proposals come forward, there is sufficient flexibility allowed for in Strategic Policy 39 and its supporting text such that a reduced amount or contribution for affordable housing may be justified on a case-specific basis.
83. The Council has, however, taken note of representations that have questioned the viability specifically of extra-care housing. It is acknowledged that this form of specialist housing is more costly to develop and run. The Council has therefore undertaken additional viability work to test the viability of such schemes, using the same assumptions and methodology as for the **Horsham Local Plan Viability Study (H12)**; the update is published as the **Horsham Local Plan Viability Assessment Addendum (HDC15)**. This update has concluded that it is generally not viable to provide affordable housing as, or as part of, extra-care housing. **Modifications** to Strategic Policy 39 and Policy 42 are therefore suggested in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024** (respectively **SM43** and **SM44**) to exclude this specific use from the policy requirements relating to affordable housing.

Question 6: Is Policy 44: Rural Workers Accommodation sound?

84. It is considered Policy 44: Rural Workers Accommodation is sound. Policy 44 sets out the policy framework to deliver viable accommodation for rural workers who may struggle to access housing near places of employment. Paragraph 10.71 to Paragraph 10.73 supporting Policy 44 of the Plan establish the context to this policy; Horsham is predominantly a rural district and a highly desirable place to live. Preventing isolated, speculative development in the open countryside is a key objective of the Horsham District Local Plan. However one exception to this is the provision of accommodation for rural workers where it is essential that they should reside close to their place of work, in the interests of sustaining thriving rural enterprises.
85. Part of the policy justification lies with the spatial distribution of employment in Horsham District in the **Northern West Sussex EGA Update (EC02)**: this indicates 32.7% of employment in Horsham District is rurally based signifying the rural economy is very important to the economic health of the district. Furthermore, the EGA Update finds that Horsham District is very attractive to highly skilled workers, which creates significant inflation pressure on local house prices, making it unaffordable to many local residents who are employed in relatively lower paid occupations. It is within this context that many

rural workers often struggle to secure adequate accommodation in rural Horsham close to centres of employment.

86. **Paragraph 80 of the NPPF** establishes the framework for Rural Housing and is clear in that isolated and unsustainable development in the open countryside should be avoided with a number of exceptions. **Part (a) of Paragraph 80** acknowledges exceptions should be made for rural workers who require essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside.
87. Further guidance on paragraph 80 (a) is given in **Planning Practice Guidance (PPG) (Ref ID: 67-010-20190722)** which advises how paragraph 80 (a) should be framed in planning policy. The following table evaluates how Policy 44 meets the guidance from the PPG regarding Rural Worker Accommodation:

Planning Practice Guidance: Rural Workers	Policy 44 of the Horsham District Local Plan
Evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise (for instance, where farm animals or agricultural processes require on-site attention 24-hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);	It is considered that provision is made for this under criterion (a) (b) of Policy 44 and paragraph 10.73 of the supporting text to the policy.
The degree to which there is confidence that the enterprise will remain viable for the foreseeable future;	It is considered that provision is made for this under criterion (b) of Policy 44.
Whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;	It is considered that provision is made for this under criterion (c) of Policy 44 and paragraph 10.71 of the supporting text to the policy.
Whether the need could be met through improvements to existing accommodation on the site, providing such improvements are appropriate taking into account their scale, appearance and the local context; and	It is considered that provision is made for this under criterion (d) (e) of Policy 44 and paragraph 10.73 of the supporting text to the policy.
In the case of new enterprises, whether it is appropriate to consider granting permission for a temporary dwelling for a trial period.	It is considered that national policy provides adequate policy coverage.

88. In summary, Policy 44 is considered to be positively prepared and consistent with national policy, as its primary aim is to support rural workers' dwellings where necessary and appropriate, giving consideration to the economic needs/interests of establishing a new, or meeting the needs of a current rural business/enterprise. However, this is in the context of restricting sporadic and isolated development in the countryside that is not sustainable, as well as protecting the intrinsic beauty and landscape character of the countryside.

Question 7: Is Policy 45: Replacement Dwellings and House Extensions in the Countryside sound?

89. **NPPF paragraph 80** states development in the open countryside, away from existing settlements or from areas allocated for development in development plans, should be strictly controlled. As set out in **Topic Paper One: The Spatial Strategy (HDC02)**, development in Horsham District has traditionally focused on smaller scale development adjoining existing villages and towns and larger scale urban extensions to deliver more strategic levels of growth. In accordance, with the national policy isolated development outside existing defined settlement boundaries should be avoided. On occasion, new houses in the open countryside require special justification for example where it is essential to enable farm or forestry workers to live at or near their place of work. The replacement of small country dwellings with larger houses on the same footprint can radically change the character of a site to one of a more suburban or urban in nature and when clearly disproportional to the original building, can be tantamount in its impact to the creation of a new dwelling and can therefore undermine both national and local plan policies on restriction of new development in the countryside.
90. Is it considered Policy 45: Replacement Dwellings in House Extensions in the Countryside has been **positively prepared** and seeks to ensure that any replacement dwellings and outbuildings are of an appropriate scale, siting and design, and have due regard to the countryside setting and the existing dwelling through the implementation of the four criterion which applies strict controls on replacement dwellings. This carries forward the existing approach in Policy 28: Replacement Dwelling and House Extensions in the Countryside of the existing **Horsham District Planning Framework (HDC05)** and split into two policies in the emerging Horsham District Local Plan, Policy 45 Replacement Dwellings in House Extensions in the Countryside and Policy 46 Ancillary Accommodation respectively. Since the adoption of the **Horsham District Planning Framework (HDPF) (HDC05)** in November 2015 the council has processed on average per year 20 planning applications related to replacement dwellings demonstrating the effectiveness of Policy 28 of the HDPF. It is considered to be an effective policy mechanism to maintain the essential rural nature and qualities of the area by preventing the over development of sites and prevent a material visual intrusion into the open countryside. It was therefore considered **justified and effective** to continue this approach.

Question 8: Is Policy 46: Ancillary Accommodation sound?

91. Policy 46 is concerned with extensions to existing houses in the countryside and ancillary buildings within the site curtilage. Policy 46 has been **positively prepared** as it allows for development in appropriate cases subject to meeting the requirements of the policy through the satisfactory application of 6 criterion. In particular, the policy seeks to prevent the over development of such sites and a material increase in visual intrusion into the countryside. It is important that proposed extensions are subordinate to the existing dwelling and not capable of being severed from it. The policy has been positively prepared in accordance with national policy for not supporting new housing though the development of large extensions to relatively small dwellings which will fundamentally alter their character and can have a detrimental urbanising effect upon the rural character of the surrounding area (see **NPPF Paragraph 80**). There is also concern that large-scale modern replacement dwellings can lead to a reduction in the variety of housing available in the countryside.
92. Policy 28 Replacement Dwelling and House Extensions in the Countryside of the existing **Horsham District Planning Framework (HDPF) (HDC05)** has been carried forward to the Horsham District Local Plan and split into two policies in the emerging Horsham District Local Plan, Policy 45 and Policy 46 respectively. Since the adoption of the **Horsham District Planning Framework (HDC05)** in November 2015 the council has received on average per year 85 planning applications related to ancillary dwellings and has recorded 56 enforcement cases relating to annexes demonstrating the effectiveness of Policy 28 of the HDPF, which reflects the need to ensure that this matter has a policy basis. Policy 28 was found to be sound at the last Local Plan examination (**HDC06**). It was therefore considered **justified and effective** to continue this approach.

Appendix 1

Supporting Local Evidence – Space Standards

DC/13/1690 Land South of Broadbridge Heath, Old Wickhurst Lane, Broadbridge Heath

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Flat (1B-2P): Unit No 31	50	41.8
Flat (2B-4P): Unit No 32	70	57.2
Flat (1B-2P): Unit No 33	50	42.6
Flat (1B-2P): Unit No 34	50	41.8
Flat (2B-4P): Unit No 35	70	57.2
Flat (1B-2P): Unit No 36	50	42.6
Flat (1B-2P): Unit No 37	50	41.8
Flat (2B-4P): Unit No 38	70	57.2
Flat (1B-2P): Unit No 39	50	42.6

DC/12/1259 Land East of A24 (Phase 2), Worthing Road, Horsham

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
End of Terrace (3B-5P) Unit No 217	93	88.57
Terrace (2B-4P) Unit No 216	79	72.9

Dwelling Type	Floor Area Prescribed by the NDSS (m ²)	Approximate Gross Internal Floor Area (m ²)
Terrace (3B-5P) Unit No 215	93	90.32
Terrace (3B-5P) Unit No 214	93	89.75
Terrace (2B-4P) Unit No 213	79	71.64
End of Terrace (3B-5P) Unit No 212	93	90.48

DC/15/0896 Kingslea Farm, Marringdean Road, Billingshurst

Dwelling Type	Floor Area Prescribed by the NDSS (m ²)	Approximate Gross Internal Floor Area (m ²)
Detached (4B-8P) Unit 2	Additional Double Bedroom – 11.5	Bed 2 (double) – 10.94
Semi-Detached (3B-5P) Unit 4	Additional Double Bedroom – 11.5 Single Bedroom – 7.5	Bed 2 (double) – 8.72 Bed 3 (single) – 6.36
Semi-Detached (3B-5P) Unit 5	Additional Double Bedroom – 11.5 Single Beds – 7.5	Bed 2 (double) – 8.72 Bed 3 (single) – 6.36
End of Terrace (3B-5P)	Additional Double Bedroom – 11.5	Bed 2 (double) – 8.72

Dwelling Type	Floor Area Prescribed by the NDSS (m ²)	Approximate Gross Internal Floor Area (m ²)
Unit 6	Single Bedroom – 7.5	Bed 3 (single) – 6.36
Terrace (3B-4P) Unit 7	84	83.95
Terrace (3B-4P) Unit 8	Additional Double Bedroom – 11.5 Single Bedroom – 7.5	Bed 2 (double) – 8.86 Bed 3 (single) – 6.57
End of Terrace (3B-5P) Unit 9	Additional Double Bedroom – 11.5 Single Bedroom – 7.5	Bed 2 (double) – 8.86 Bed 3 (single) – 6.57

DC/18/2514 Land West of Brighton Road, Shermanbury

Dwelling Type	Floor Area Prescribed by the NDSS (m ²)	Approximate Gross Internal Floor Area (m ²)
End of Terrace (3B-5P) Unit 1	Single Bedroom – 7.5	Bed 3 (single) – 6.49
Terrace (2B-4P) Unit 2	79	76.98
Terrace (2B-4P) Unit 3	79	76.67
End of Terrace (3B-5P)	Single Bedroom – 7.5	Bed 3 (single) – 6.82

--	--	--

**DC/18/0989 Bellway Homes Development Site, Old Guildford Road
Broadbridge Heath**

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Terrace (2B-4P)	79	76.04
Terrace (3B-5P)	93	86.4
Bungalow (2B-4P)	70	69.27
Bungalow (3B-6P)	Additional Double Bedrooms – 11.5	Bed 2 (double) – 9.71 Bed 3 (double) – 9.17
Detached (3B-5P)	93	86.6
Semi-detached (3B-5P)	93	81.82
Detached (4B-6P)	Additional Double Bedrooms – 11.5 Single Bedrooms - 7.5	Bed 2 (double) – 10.42 Bed 3 (single) – 7.22 Bed 4 (single) – 7.00
Detached (4B-7P)	Additional Double Bedrooms – 11.5 Single Bedrooms - 7.5	Bed 2 (double) – 10.05 Bed 3 (double) – 10.10 Bed 4 (single) – 6.65

DC/17/0566 The Vicarage, Church Street, Warnham

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Apartment (2B-3P) Unit 2	Main Bedroom – 11.5 Additional Double Bedrooms – 11.5	Main Bed – 10.06 Bed 2 (double) – 8.5
Apartment (2B-3P) Unit 3	Main Bedroom – 11.5 Additional Double Bedrooms – 11.5	Main Bed – 10.23 Bed 2 (double) – 8.56
Apartment (2B-4P) Unit 4	70	66.17
Apartment (2B-4P) Unit 5	70	68.50
End of Terrace (2B-4P) Unit 6	79	76.95
Semi-Detached (3B-5P) Unit 10	Additional Double Bedrooms - 11.5 Single Bedrooms – 7.5	Bed 2 (double) – 10.90 Bed 3 (single) – 5.67
Semi-Detached (3B-5P) Unit 11	Additional Double Bedrooms - 11.5 Single Bedrooms – 7.5	Bed 2 (double) – 10.90 Bed 3 (single) – 5.67
Semi-Detached	Additional Double Bedrooms - 11.5 Single Bedrooms – 7.5	Bed 2 (double) – 10.92 Bed 3 (single) – 5.77

DC/15/2788 Paula Rosa Kitchen, Robell Way, Storrington

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Apartment (2B-4P)	70	67.70

Unit 2BA		
Apartment (1B-2P) Unit 1BA	50	49.40

DC/16/2917 Rudgwick Metals Ltd, Church Street, Rudgwick

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Detached (4B-7P) Unit/Plot 4	Main Bedroom – 11.5 Additional Double Bedroom – 11.5	Main Bedroom – 11.00 Bed 2 (double) – 9.97 Bed 3 (double) – 9.94
Semi-detached (3B-5P) Unit/Plot 5	93	90.77
Semi-detached (3B-5P) Unit/Plot 6	93	90.77
Semi-detached (2B-4P) Unit/Plot 7	Additional Double Bedroom – 11.5	11.33
Semi-detached (2B-4P) Unit/Plot 8	Additional Double Bedroom – 11.5	11.33

DC/17/1140 Land North of West End Lane, Henfield

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Coach House (2B-4P) House Type AA	70	64.14

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Terrace (3B-5P) House Type AC	93	84.64
Apartment (1B-2P) House Type AE	50	45.39
Detached (4B-7P) House Type C	Additional Double Bedrooms – 11.5	Bed 2 (double) – 10.92 Bed 3 (double) – 10.21
Detached (4B-8P) House Type D	Additional Double Bedrooms – 11.5	Bed 2 (double) – 9.41 Bed 3 (double) – 8.71
Detached (4B-7P) House Type E	115	114.35
Semi-detached (3B-4P) House Type G	Single Bedrooms – 7.5	4.67
Semi-detached (2B-4P) House Type H	79	77.58
Semi-detached (4B-7P) House Type K	Additional Double Bedrooms – 11.5 Single Bedrooms – 7.5	Bed 2 (double) – 10.68 Bed 3 (double) – 9.07 Bed 4 (single) – 5.44
Semi-Detached (2B-4P) Unit Type AB	79	76.95

DC/16/0871 Abingworth Development Site, Storrington Road, Thakeham

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Detached (4B-8P) Unit 25	Additional Double bedroom – 11.5	Bed 4 (double) - 9.32
Detached (5B-9P*) Unit Nos 22 & 38	Additional Double Bedrooms – 11.5 Additional Single Bedrooms - 7.5	Bed 3 (double) 11.12 Bed 4 (single) 6.82 Bed 5 (double) 11.03
Detached (5B-10P*) Unit Nos 28 & 29	Additional Double Bedrooms – 11.5	Bed 4 (double) – 9.48 Bed 5 (double) – 7.98

DC/16/0933 Land rear of 1-25 Hayes Lane, Slinfold

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Detached (3B-6P) Unit Nos 2,4,6 & 11	Additional Double Bedrooms - 11.5	Bed 2 (double) 10.54 Bed 3 (double) – 9.39
Semi-detached (2B-4P) Unit Nos 7, 8, 9, 10, 12, 14 & 16	Additional Double Bedrooms – 11.5	Bed 2 (double) – 9.61
Semi-detached (3B-5P) Unit 15	Additional Single Bedrooms – 7.5	Bed 3 (single) - 7.29

DC/15/1084 Land North of Highfield, Stane Street, Codmore Hill

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Detached (5B-10P*) Unit 14	Additional Double Bedrooms – 11.5	10.14
Single Storey Terrace (2B-4P) Unit No 18	70	67
Terrace (2B-4P) Unit No 19	70	75
Terrace (2B-4P) Units Nos 37-39	79	75
Flat (1B-2P) Unit Nos 50-51	50	48
Flat (2B-4P) Unit No 54	70	65.60
Coach House (2B-4P) Unit No 57	Additional Double Bedrooms – 11.5	Bed 2 (double) - 11.32
Semi-detached (4B-7P) Unit Nos 61 & 62	115	108.6
Detached (4B-8P) Unit No 65	Additional Double Bedrooms – 11.5	Bed 2 (double) – 10.70 Bed 3 (double) – 10.54 Bed 4 (double) – 7.04
Detached (5B-10P*) Unit No 69	Additional Double Bedrooms – 11.5	Bed 3 (double) – 9.79 Bed 4 (double) – 10.09

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Semi-detached (4B-7P) Unit Nos 90 & 91	115	105.50
Detached (4B-8P) Unit No 93	Additional Double Bedrooms – 11.5	Bed 3 (double) - 11.36 Bed 4 (double) – 10.11

DC/16/1017 Park North and North Point, North Street, Horsham (Holmes Park scheme)

Dwelling Type	Floor Area Prescribed by the NDSS (m²)	Approximate Gross Internal Floor Area (m²)
Apartment S1 (1B-2P)	58	42
Apartment S2 (1B-2P)	58	43
Apartment S3 (2B-4P)	79	64
Apartment S4 (2B-4P)	79	65
Apartment S5 (2B-4P)	79	74
Apartment S6 (1B-2P)	58	48
Apartment S7 (1B-2P)	58	50
Apartment S8 (2B-4P)	79	66
Apartment S9 (1B-2P)	58	50
Apartment S10 (1B-2P)	58	48
Apartment S11 (2B-4P)	79	66

'Class O' Office-to-Residential Conversions – Evidence of Space Standards

DC/16/2872 Prewetts Mill, Worthing Road, Horsham

Dwelling Type	Floor Area Prescribed by the NDSS (m ²)	Approximate Gross Internal Floor Area (m ²)
Apartment (1B-2P)	58	42
Studio Apartment (1B-1P)	37 (with shower room)	30.29
Apartment (1B-2P) Unit 1	Main Bedroom – 11.5	10.44
2 Bed Apartment (2B-4P) Unit 17	Main Bedroom – 11.5	Bed 1 (double) – 10.62 (Bed 2 met NDSS)
3 bedroom Duplex (3B-6P) Unit 21	Main Bedroom – 11.5 Additional Double Bedrooms – 11.5	Bed 1 (double) – 9.16 Bed 2 (double) – 9.17 Bed 3 (double) – 10.69

Notes

- (i) B = No of bedrooms and P = No of people e.g. 1B-2P = 1-bed, 2 persons property
- (ii) * The asterisk highlights where the properties have been identified as suitable for more than 8 people. The NDSS only covers properties for up to 8 persons.
- (iii) The approach of this desk-based evidence gathering has been to take 'samples' of consented development that have come through the approval of planning applications over the last 4-9 years. This research has been conducted in the spirit of random sampling and have not been singled out. It should also be noted that not every unit on the sites selected have been assessed.
- (iv) Of the sample planning application consents that have been used in this desk-based research, only the properties where dwellings have been delivered below the NDSS have been included in the tables above
- (v) The data contained in the above tables, in the first instance, identifies where the delivered GIA was below the NDSS. Where units on the same schemes were found to meet the NDSS they have not been included in the tables in Appendix 2 as the purpose of this exercise has been to present evidence to justify the adoption of the NDSS into local planning policy.
- (vi) Where the GIA met the NDSS, but the bedroom space was below the prescribed floor areas for main and double bedrooms and single bedrooms, this has been identified in the tables.
- (vii) The majority of the Gross Internal Floor Areas have been provided by the site promoters and contained within the floor plans. However, there are some instances where floor areas have been measured using the PDF measuring tool and in these instances, there may be some small rounding/measuring errors.
- (viii) Some of the floor plans of DC/17/0667 Land Parcel at Nuthurst Road, Monks Gate were also assessed, but of all the sites sampled this was the only site that met the NDSS in full, in terms of GIA and bedroom sizes and this site has, therefore, not been included in the tables above.