

## **Position Statement of Horsham District Council**

### **Agenda Item 3**

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

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

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

#### **KEY DOCUMENTS for cross-reference:**

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

#### **Representations submitted by:**

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

## Introduction

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

## General Conformity

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

## Horsham District Local Plan Review

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

---

<sup>1</sup> Paragraph: 105 Reference ID: 41-105-20190509  
Revision date: 09 05 2019

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

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

### Representations

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

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

## **Conclusion**

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

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