



THAKEHAM

Southwater Neighbourhood Plan
Southwater Parish Council
Beeson House
26 Lintot Square
Fairbank Road
Southwater
West Sussex
RH13 9LA

17th July 2019

Dear Sirs

Representation to the Southwater Neighbourhood Development Plan 2019 -2031 (Regulation 16) consultation – Representation on behalf of Thakeham Homes Ltd.

Land to the west of Worthing Road, Horsham

These representations have been produced in response to the publication of the Southwater Neighbourhood Plan (SNP) Consultation (Regulation 16) by Horsham District Council (HDC) and relate specifically to Land to the west of Worthing Road, Horsham (the site).

The site was first submitted to the Southwater Parish Council in May 2015 and therefore has had a long history of promotion to both this NP, and also for a longer period to Horsham District Council. A location plan that identifies the full extent of the site is attached at Appendix 1.

We wish to support the progression of the SNP; however, we continue to have concerns regarding the amount of housing provision within the Parish and the reliance on just one housing allocation (Policy SNP2). This has been raised previously in our submission to the Regulation 14 consultation dated 6/11/2018, and it is disappointing that the Neighbourhood Plan Team have not sought to address this issue in the latest iteration of the Plan. It is our view that a broader spatial approach to the distribution of housing within the Parish should be adopted in order to maintain the vitality of smaller settlements. If this single allocation was to falter in its delivery, then the Neighbourhood Plan would not adequately meet its housing needs - or the District as a whole - and so the Parish would be more liable to windfall development over which it has no control. We are concerned that the plan as presented does not provide sufficient resilience for ensuring delivery and we would urge that the Local Authority and examiner seek to address this issue in full before any recommendations for a referendum is made.

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Neighbourhood Plan

The National Planning Policy Framework (NPPF, para 16) identifies that neighbourhood plans should support the strategic development needs set out in the Local Plan and plan positively to support local development.

In order for the Neighbourhood Plan to be Made it must meet the Basic Conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

There are five Basic Conditions that a draft Neighbourhood Plan must meet, as follows:

- (a) Having regard to National policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
- (d) The making of the order contributes to the achievement of sustainable development;
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- (f) The making of the order does not breach, and is otherwise compatible with EU obligations
- (g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

The SNP must therefore accord with the Horsham District Planning Framework (HDPF 2011 – 2031). The growth strategy in the HDPF outlined in Policy 15 (Housing Provision) makes provisions for at least 16,000 (800 dpa) within the period 2011 -2031; with at least 1500 homes throughout the District to be allocated through Neighbourhood Plans in accordance with the settlement hierarchy and 750 windfall units.

Whilst we note that the Southwater Housing Needs Assessment (paragraph 258) recommends a housing target of between 420 – 460 to be delivered over the plan period (2017-2033), which is reflected in the SNP policy SNP2 (Allocation for Residential Development). This policy makes provision for a minimum of 422 residential units to be provided at Land west of Southwater. However, Page 12 of the SNP states '*Southwater has expanded rapidly in recent years, nevertheless there is still a housing shortage within the parish and the wider area*' (Own emphasis added).

Given that the neighbourhood plan identifies that there is still a housing shortage within the District and the expected increase in housing numbers as part of the Local Plan review, the SNP will be required to deliver a greater quantum across the future plan period.

Land to the west of Worthing Road, Horsham

The site is less than 1km from the centre of Horsham Town Centre which offers a wide range of facilities and services including, Primary and Secondary Schools, shopping and leisure facilities. The surrounding area has an edge of settlement character and appearance with considerable residential influences. Given its proximity to Horsham Town Centre, the site is considered to be well connected to the existing built-up area. The site is unconstrained by national policy designations such as the AONB and Green Belt. The site is not within a Conservation Area or any Statutory or locally designated ecological site. As such, given the site's sustainable location, proximity to the Town Centre and the need for minimal infrastructure provision, the site is considered to be suitable for residential development.

Availability

The National Planning Policy Guidance (NPPG) provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

NPPG Paragraph 021 Ref. 3-020-20140306

The landowners of this site have entered into a legal agreement with Thakeham Homes. As such, we can confirm that the entire site is within the control of Thakeham Homes and is available for residential development within the next five years.

Suitability

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

NPPG Paragraph 019 Ref. 019-20140306

The site is located within the parish of Southwater and could deliver much needed housing within the parish. A Full planning application has been submitted to HDC (Ref: DC/18/0944) together with a full suite of supporting documents, thereby demonstrating the site's suitability for residential development.

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As such, we consider that the site is suitable for the delivery of residential development and should be allocated in the neighbourhood plan for residential development.

Achievability

In determining whether a site is achievable for development, the NPPG provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”

NPPG, Paragraph 021 Ref. 021-20140306

Thakeham has a proven track record for delivering schemes of a similar size and scale throughout the South East and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period as a Full application is presently pending determination.

Deliverability

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period.

Conclusions

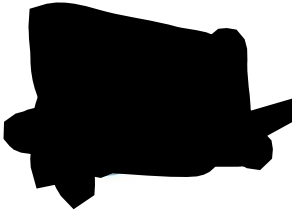
Given the matters discussed within this representation, it is our view that the SNP should allocate an additional site to ensure the plan meets the definition of sustainable development and is in accordance with National policy by being positively prepared and flexible to change.

Land west of Worthing Road, Horsham is unconstrained by national policy designation such as the Green Belt and Area of Outstanding Natural Beauty (AONB). As such, the site is considered to be in a sustainable location, and well related to the existing built up area.

For the reasons outlined above, we confirm that Land west of Worthing Road, Horsham is available, suitable and achievable, and therefore deliverable in accordance with the NPPG, whilst importantly also having a developer interest which further demonstrates its availability for delivery. As such, it is our view that the SNP should include this site to ensure that the NP strategy and District's spatial strategy is robust and resilient to change.

We trust that these representations are clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours Faithfully,



Planner

Encl.
Appendix 1 – Location Plan