



Strategic Housing and Economic Land Availability Assessment (SHELAA)

Housing Report 2018

Horsham District Council

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Glossary

AONB	Area of Outstanding Natural Beauty
BUAB	Built Up Area Boundary
KEA	Key Employment Areas
NPPF	National Planning Policy Framework
NDP	Neighbourhood Development Plan
HDPF	Horsham District Planning Framework (<i>adopted November 2015</i>)
RSL	Registered Social Landlord
SAC	Special Area of Conservation
SHLAA	Strategic Housing Land Availability Assessment
SHELAA	Strategic Housing & Economic Land Availability Assessment
SFRA	Strategic Flood Risk Assessment
SDNP	South Downs National Park
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SSWNP	Storrington, Sullington and Washington Neighbourhood Plan
TPO	Tree Preservation Order

Contents

Executive Summary	3
Important information about the SHELAA	7
1. Introduction	10
2. Background	11
3. Progress to Date	13
4. Methodology	15
Stage 1: Site/Broad Location Identification	15
Stage 2: Site/ Broad Location Assessment	28
Stage 3: Windfall Assessment	41
Stage 4: Assessment Review	42
Stage 5: Final Evidence Base	43
5. Conclusions	45
6. Monitoring & Next Steps	46
Appendix 1: Assessment of broad locations in Northern West Sussex Housing Market Area	48
Appendix 2: Assessment of Windfall Potential	59
Appendix 3: Site Assessments and Maps	62

Executive Summary

Introduction

This Housing Report provides the Strategic Housing Land Availability Assessment (SHLAA) which forms part of the Strategic Housing & Economic Land Availability Assessment (SHELAA). It is an evidence base document used to support the development of planning policy documents including the adopted Horsham District Planning Framework (HDPF) and its review, and to help inform emerging Neighbourhood Development Plans. The aim of the SHELAA is to provide an assessment of potential housing and economic land and to enable the Council to identify a sufficient supply of deliverable sites to provide five years' worth of housing and identify suitable deliverable sites or broad locations for 6-10 years and 11-15 years where possible, as required through paragraph 67 of the National Planning Policy Framework (NPPF)¹.

This Housing Report is the fifth housing assessment to be published by Horsham District Council. It forms the second element of the 2018 SHELAA and follows the Economic Land Report which was published in April 2018. This SHELAA housing assessment has a base date of 26 October 2018 but it also includes appropriate updates to reflect the Examiner's Report on the Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) published 22 November 2018. It supersedes the former SHELAA Housing Report published in August 2016.

The name of the assessment changed in 2015 following the publication of the 'Housing and Economic Land Availability Assessment' guidance in 2014². This set a requirement for Local Authorities to also consider the availability of economic land. In respect of housing availability the title SHLAA also remains relevant and interchangeable with the title SHELAA. For the purposes of this report the term SHELAA will be applied unless relevant to do otherwise.

The findings of the SHELAA present a snap-shot of information held in the Council's SHELAA database at the time the report is published. The SHELAA is a living document which the Council reviews regularly with an intention to publish annual updates.

¹ The requirements of the NPPF, paragraph 73, is addressed in the Authority Monitoring Report which is published annually and normally Chapter 3 is reviewed to provide a housing mid-year update

² <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment>

The SHELAA is an assessment of land availability that seeks to identify a future supply of land, which is suitable, available and achievable for housing and economic development uses over the plan period. Both landowners and developers (predominantly) may submit land to the District Council for assessment and inclusion in the SHELAA. The SHELAA helps the local planning authority to understand the extent of land potentially available for development in an area and is part of the evidence base for a Local Plan. Parish Councils may also wish to use the SHELAA as an evidence base for the development of Neighbourhood Development Plans, as would any other groups, individuals or organisations with an interest in the District.

Background

Paragraph 67 of the National Planning Policy Framework (NPPF) expects strategic policy-making authorities to prepare a Strategic Housing Land Availability Assessment in order to have a clear understanding of the land available for new homes in their area. It advises that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It also advises that planning policies should identify a supply of specific, 'deliverable' sites for the first five years of the plan period and specific 'developable' sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. The supporting national guidance makes clear the assessment of land availability is an important step in the preparation of Local Plans and helps to identify which sites or broad locations are the most suitable and deliverable for a particular use in order to meet objectively assessed needs.

The Strategic Housing and Economic Land Availability Assessment (SHELAA) is the process of gathering together this information to create a portfolio of sites which may be considered for future planning purposes. The assessment process has assisted Horsham District Council (HDC) in the identification of locations for housing or economic land allocated in the Horsham District Planning Framework (HDPF) and will continue to do so as the plan is reviewed. The SHELAA will also assist local Parish Councils and the Neighbourhood Forum as a first step in the identification of sites to be considered for inclusion in their emerging Neighbourhood Development Plans.

Findings

- The District's housing requirement is 800 dwellings per annum as set out in the Horsham District Planning Framework adopted in November 2015. This equates to a 5 year requirement of 4,000 units;
- Adding on the additional 5% buffer required under paragraph 73 of the NPPF, the District's housing requirement for the next 1-5 years is 4,263 units (4060*1.05 [5% buffer on: 5x800 + outstanding requirement 2011-2018 of 60 units]) and a further 4,000 units for years 6-10 and years 11-15 thereafter;
- The SHELAA demonstrates that the Council has enough potential housing sites, to meet its five and ten year housing requirements. There is a surplus of sites which means that the Council is able to progress those sites which have been assessed as the 'most sustainable';
- The Council identifies 4,539 dwellings on sites which are considered 'deliverable' within years 1-5;
- The assessment identifies 3,616 units which the Council considers developable within years 6-10;
- The Council has provided compelling evidence, based on an analysis of the historic delivery of windfall sites (presented in Appendix 2 of this document) to include a windfall allowance of 50 dwellings per annum into their anticipated supply. This annual figure was established as part of the Horsham District Planning Framework (HDPF) Examination Hearings held in late 2014 to mid-2015.;
- The following trajectory sets out the potential supply of housing taking into account the capacity of suitable SHELAA sites and windfall assumptions;

Time Period	Estimated No. of Homes		
	SHELAA Capacity	Windfall allowance	Total Supply
2019-2023	4,539	150	4,689
2024-2028	3,616	250	3,866
2029-2033	2,658	250	2,908
TOTAL	10,813	650	11,463

- Considering the information above, the potential supply of identified sites considered 'deliverable' (1-5 years) and 'developable' (6-10 years) together with a windfall allowance of 50 units per annum is 8,555 units. This is enough to meet a ten year supply of housing sites and clearly indicates Horsham District Council is able to meet its five year housing supply requirement, including a 5% buffer.

Monitoring & Next Steps

The SHELAA capacity will be updated and assessed annually as part of the annual Authority monitoring process.

Sites submitted to the Council following the cut-off date for this report (26 October 2018) will be considered as part of the 2019 SHELAA review together with any additional information available on each of the sites considered in this report.

It should be noted that this SHELAA has taken into account local policy constraints unlike previous iterations, it therefore takes a 'policies on' approach as allowed through the 2014 national guidance. This has led to a number of sites that were previously considered to be 'developable' being moved into the 'Not Currently Developable' classification. This is largely due to the regard given, when site constraints were assessed, to the settlement hierarchy approach set in the HDPF and the policies that seek to protect the countryside. As the review of the Local Plan progresses and further sites are proposed for allocation the number of sites assessed to be 'developable' will significantly increase (HDC expect to publish a Regulation 18 draft Local Plan for consultation in Autumn 2019).

Important Information about the SHELAA

In order to avoid any unnecessary confusion, the Council would like to make the following points clear in relation to the Strategic Housing and Economic Land Availability Assessment (SHELAA) and any related findings;

- The SHELAA only identifies opportunities for housing development on sites, which are considered to be deliverable, developable and available. *It does not allocate sites to be developed.* The allocation of sites for future housing development will be identified through Local Plans or Neighbourhood Development Plans.
- The identification of potential housing sites within the SHELAA does not imply that planning permission would be granted if an application were to be submitted. The SHELAA is a high level assessment. All planning applications will continue to be considered against the appropriate policies within the adopted Development Plan, having regard to any other material considerations.
- The inclusion of potential housing sites within the SHELAA does not preclude them from being considered for other uses.
- Site boundaries are based on the information available at the time of the assessment. The SHELAA does not limit an extension or contraction of these boundaries for the purpose of a planning application or proposed allocation.
- The SHELAA includes sites suitable to accommodate five³ dwellings or more. The exclusion of sites from the SHELAA which fall below this threshold does not preclude the possibility of a planning application being submitted and later granted. Suitable sites (particularly small sites) for residential development that have not been identified in the SHELAA will continue to come forward through the usual planning process, including neighbourhood planning.
- The classification of sites in terms of when they are likely to come forward for delivery (i.e. green 1-5 years, yellow 6-10 and 11+ years) is based on an

³ Please note, prior to the 2018 SHELAA, previous iterations of the SHELAA applied a threshold of six dwellings or more.

assessment of deliverability / developability of the site when the SHELAA was undertaken. Circumstances or assumptions within this document may change over time, which may mean that sites could come forward sooner or later than originally envisaged.

- The classification of a site is based on the classification of the developable area within that site. Therefore if part of a site is considered 'developable' – i.e. that it is likely to be delivered within years 6-10 or 11+, then the whole of the site would be coloured yellow. That is not to say that the whole site would be developed, only that there is potential for some form of development to be delivered on that site within the given timescale.
- Within this SHELAA assessment, only sites which have been allocated within the Development Plan, granted planning permission, or where an application has been submitted and the Council consider the site to be in a suitable location and achievable within the first five years, have been assessed as green / deliverable in years 1-5. Sites with planning permission will be considered deliverable until that planning permission expires, unless there is clear evidence a scheme will not be implemented within five years; for example the development is no longer viable, there is no longer a demand for the type of units or the site has a long term phasing plan.
- The housing capacity of a site in the study either relates to the number of dwellings granted in a planning permission (where applicable), or is an estimate based on an assessment of what could be an appropriate density for the site in question. The site capacities in the study do not preclude different densities being supported at a detailed planning application stage, subject to a thorough assessment of local landscape and townscape character considerations and relevant other details.
- Once an application has been permitted for a site, the total capacity of the site is updated to reflect the permission. In the case of broad locations, the capacity of the wider site area would be reduced by the number of units granted planning permission to avoid double counting. The remainder of the site area is then assessed for its development potential. If no other portion of the site remains deliverable or developable, the remainder of the site is excluded or assessed as 'Not Currently Developable' depending on the characteristics of the site.

- The information that accompanies the SHELAA is based on the information available at the time of the assessment. As such there may be additional constraints that were not identified as part of the initial assessment. Likewise, some of the original constraints may have been removed since the information was compiled. Agents and landowners submitting planning applications are therefore advised to carry out their own analysis of sites to identify constraints and not rely solely on the findings of the SHELAA.
- There is no limit to the amount of land that can be included within the SHELAA, and there is no limit on the number of sites which can be submitted.
- The SHELAA is one of a number of background documents used to inform the preparation of Local Plans and Neighbourhood Development Plans. .
- The SHELAA is a living document which will be updated on an annual basis. All SHELAA sites will be reviewed as part of the next SHELAA review.
- The 2018 Report has a base date of 26 October 2018 (or the 22 November 2018 for sites covered by the SSWNP) and the findings presented in this report represent a snap-shot of information held by the Council at that time. Should any further information be submitted which would change the status of a site following the publication of this SHELAA Report; it will be saved on file and used to re-assess the sites, when the SHELAA is reviewed in 2019.
- Any sites submitted after this cut-off date will be included in the next review of the SHELAA.

1. Introduction

- 1.1 The National Planning Policy Framework (NPPF) expects Local Planning Authorities to have a clear understanding of the land available in their area through the preparation of a SHLAA and maintain a five year supply of deliverable housing sites. As part of this process, Local Planning Authorities must consider where housing development would be best located and assess all potential opportunities for development locations. The Strategic Housing and Economic Land Availability Assessment, from here on referred to as the 'SHELAA', is the process of gathering together this information to create a portfolio of housing sites which may be picked for future planning purposes. The assessment has assisted Horsham District Council (HDC) in the identification of potential locations for housing, which informed the allocations in the adopted Horsham District Planning Framework. It continues to assist the District Council and Parishes in the identification of sites to be considered in the Local Plan Review and emerging Neighbourhood Development Plans.
- 1.2 This SHELAA Report (formerly known as the SHLAA) forms the second element of the 2018 SHELAA with the Economic Land Assessment published in April 2018. The SHELAA Housing Assessment has a base date of 26 October 2018 or, in respect of sites covered by the SSWNP, 22 November 2018 and supersedes the former SHELAA Report published in August 2016.
- 1.3 The name of the report changed in 2015 to reflect the assessment of economic land together with housing land, in accordance with the 'Housing and Economic Land Availability Assessment' guidance, from here on referred to as the 'SHELAA Planning Practice Guidance'⁴. The findings of the SHELAA present a snap-shot of information held in the Council's SHELAA database at the time the report was published. The SHELAA is a living document and will be updated on an annual basis.
- 1.4 Paragraph 67 of the National Planning Policy Framework (NPPF) expects strategic policy-making authorities to prepare a Strategic Housing Land Availability Assessment in order to have a clear understanding of the land

⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment>

available for new homes in their area. It advises that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. They should also identify a supply of specific, 'deliverable' sites for the first five years of the plan period and specific 'developable' sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. The supporting national guidance makes clear the assessment of land availability is an important step in the preparation of Local Plans and helps to identify which sites or broad locations are the most suitable and deliverable for a particular use in order to meet objectively assessed needs.

- 1.5 The aim of the SHELAA is to assist local authorities in the identification of suitable sites for housing development to enable them to maintain an adequate supply of housing land to meet their identified local housing needs. As part of this process, Local Planning Authorities must assess all potential opportunities for development locations to consider where residential development would be best located.
- 1.6 It is important to note that the SHELAA does not set policy or allocate sites for development; nor does the inclusion of sites within the SHELAA pre-determine the consideration of a future planning application. This will be considered as part of the planning application process in full consultation with all interested parties, including local communities.

2. Background

- 2.1 The Horsham District Planning Framework, from here on referred to as 'the HDPF' covers the plan period from 2011 to 2031. The Proposed Submission version of the HDPF was approved by the Council in April 2014 and submitted to the Planning Inspectorate in August 2014. The Examination into the soundness of the HDPF was undertaken between November 2014 and July 2015. The Planning Inspector appointed by the Government to examine the plan, published his Initial Findings on the 19th December 2014. In this letter, the Planning Inspector identified concern with the proposed levels of housing provision and stated that the Council should accommodate more new housing than what the original plan was identifying (650 units per annum at that time). The Inspector

also stated that he supported the overall strategy to concentrate growth around the district's main settlements such as Horsham town, Southwater and Billingshurst along with some development in smaller villages, in accordance with Neighbourhood Plans that are currently being produced.

- 2.2 As a result, HDC considered options for increasing its assessed housing number of 650 new homes per year to meet the Inspector's requirement of at least 750 homes per year. The SHELAA was a key piece of evidence in this process, and was used to ensure the identification of further suitable sites for development. Parish Councils throughout the District have also used the SHELAA as a basis for identifying sites to be taken through the Neighbourhood Planning process.
- 2.3 The Inspector published his Final Report into the Examination of the HDPF in October 2015 in which he found the plan to be sound, however the housing requirement was increased further to 800 dwellings per annum (dpa). The HDPF was formally adopted by Council in November 2015.
- 2.4 The SHELAA Planning Practice Guidance, last updated 13 September 2018⁵, states that an assessment should;
- Identify sites and broad locations with potential for development;
 - Assess their development potential;
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.5 This approach ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for use.
- 2.6 Sites included in the SHELAA are subdivided into three categories and assessed according to *suitability*, *availability* and *achievability* as set out in Table 2. Further detail on how this assessment is made is set out in Section 4.

⁵ <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment>

Table 1: Classification of SHELAA sites

<p>Deliverable – To be considered ‘<u>deliverable</u>’ a site should be <i>available now</i>, be in a <i>suitable</i> location for development and be <i>achievable</i> within the next five years (i.e. that development of the site is economically viable).⁶ These sites are coloured GREEN on the maps.</p>
<p>Developable – To be considered ‘<u>developable</u>’ sites should be in a <i>suitable</i> location for housing development and there should be a reasonable prospect that the site can be <i>available</i> and <i>achievable</i> in the 6-10 or 11+ year periods.⁷ These sites are coloured YELLOW on the maps.</p>
<p>Not currently developable – If it is not known when a site could become suitable or be made available or viably developed, it is considered ‘<u>Not Currently Developable</u>’ and is coloured RED on the maps.</p>

3. Progress to Date

- 3.1 As set out in paragraph 1.1, the National Planning Policy Framework (NPPF) expects Local Authorities to have a clear understanding of the land available in their area through the preparation of a SHLAA and maintain a five year supply of deliverable housing sites. HDC therefore undertakes regular SHELAA assessments to help inform plan-making,
- 3.2 This SHELAA report follows on from the August 2016 SHELAA Report and contains a review of all potential housing sites submitted prior to the cut-off date of 26 October 2018.
- 3.3 The full 2018 SHELAA also includes an assessment of land available for economic development in accordance with national guidance issued in 2014. The Economic Land Assessment was published in April 2018
- 3.4 **South Downs National Park:** Horsham District Council is not the planning authority for sites in the South Downs National Park, and does not consider land in this area as part of the SHELAA. Sites within the National Park are a matter for the South Downs National Park Authority (SDNPA). Information on SDNPA’s SHELAA and Local Plan preparation process is available on its website.

⁶ See National Planning Policy Framework (NPPF) Glossary

⁷ See National Planning Policy Framework (NPPF) Glossary

3.5 The SHELAA Planning Practice Guidance sets out a standard methodology for undertaking a housing and economic land availability assessment.

3.6 Table 2 demonstrates the stages of the assessment which have been undertaken to date:

Table 2: SHELAA Process as set out in the SHELAA Planning Practice Guidance

Stage 1	Site and broad location identification <ul style="list-style-type: none"> • Determine the assessment area and site size • Desktop review of existing information • Call for sites/ broad locations • Site/broad location survey
Stage 2	Site/broad location assessment <ul style="list-style-type: none"> • Estimate development potential • Consider whether a site is suitable, available or achievable • Consider constraints and how they can be overcome
Stage 3	Windfall assessment <ul style="list-style-type: none"> • Determine housing / economic development potential of windfall sites (where justified)
Stage 4	Assessment Review <ul style="list-style-type: none"> • Assessment of development need for housing and economic development uses • Review assessment and prepare draft trajectory
Stage 5	Final Evidence Base Monitoring Deliverability (5 year supply); and Developability (6-11+ year supply) for housing
	The Stage 5 Assessment then informs the preparation of the Development Plan and emerging Neighbourhood Development Plans

4. Methodology

- 4.1 The following paragraphs provide a summary of the methodology adopted by Horsham District Council in preparing the SHELAA. The methodology complies with the National Planning Policy Framework (July 2018) and the SHELAA Planning Practice Guidance (last updated September 2018).
- 4.2 The NPPF identifies that local authorities should have a clear understanding of housing needs in their area and should prepare a 'Strategic Housing Land Availability Assessment' to help ascertain the land available in their area and to inform the plan making process so that planning policies can identify a sufficient supply and mix of housing sites over the plan period.

Stage 1: Identification of Sites / Broad Locations

Timetable

- 4.3 The SHELAA is used to establish realistic assumptions about the availability, suitability and achievability (including viability) of land to meet the identified need for housing over the plan period. As specified in paragraph 67 of the NPPF, the SHELAA is required so that planning policies can identify a supply of deliverable sites to provide housing for the first 5 years of the plan period, and a supply of developable sites or broad locations for 6-10 years, and where possible 11+ years of the plan.
- 4.4 The SHELAA is a 'live' document and the Council continues to invite submissions for consideration in future assessments on an ongoing basis. Each SHELAA report has a base date to enable an accurate analysis of available sites to be undertaken. The base date (or 'cut off date') for this report was the 26 October 2018 (or, in respect of sites covered by the SSWNP, the 22 November 2018). This means that all sites submitted to the SHELAA prior to this date have been included in this assessment, whilst sites submitted after this date will be included in a subsequent review of the SHELAA. Similarly sites which were granted planning permission or completed following the 26 October 2018 will be updated / removed from the assessment in the next review of the document.

Adjacent Authorities and Partnership Working

- 4.5 There are two housing market areas operating in Horsham District. The 'Northern West Sussex Housing Market Area' covers the majority of the District and is influenced by Crawley and Gatwick, whilst the southern edge of the District, is influenced by the 'Coastal Housing Market Area' comprising Brighton, Worthing and other coastal settlements.
- 4.6 The Local Plan timetables for the local authorities within the Housing Market Areas are all different. Following the introduction of the SHLAA/SHELAA process by Government, a decision was therefore taken to proceed with the SHELAA at a District level, undertaking regular liaison with the authorities in the Northern West Sussex Housing Market Area as it is this housing market area which has the greatest influence on the district. Particular focus took place with regard to discussions on broad locations which were proposed to the authorities for development.
- 4.7 Substantial joint working was undertaken with authorities in the 'Northern West Sussex Housing Market Area' when this methodology was devised, in order to develop a joint methodology for assessing SHELAA sites and also to consider the potential for broad locations within the housing market area in line with the duty to co-operate.
- 4.8 **Northern West Sussex Housing Market Partnership:** The Housing Market Partnership (HMP) for Northern West Sussex was a partnership between Horsham District Council, Mid-Sussex District Council, Crawley Borough Council and a selection of experts who were involved with the housing industry. The idea behind the partnership was that the involvement of industry experts would add technical knowledge to the SHELAA and increase the strength of the site assessments. The Northern West Sussex HMP had the opportunity to actively participate in the development of the Strategic Housing Land Availability Assessment (SHLAA) through a series of joint meetings held with housing providers in 2009/2010 and again through invitation in 2014, the outcome of which fed into the production of this SHELAA methodology.
- 4.9 Since establishing an agreed SHELAA methodology the method for assessing housing needs has changed. The revised NPPF, published July 2018, now

seeks to ensure the minimum number of homes needed is informed by a local housing need assessment. This is to be conducted using the standard method in national planning guidance rather than through the former method, which used a Strategic Housing Market Assessment. In accordance with the NPPF, paragraph 60, the amount of housing to be planned for in the Review of the HDPF is the local housing need figure (which is calculated on a national basis / methodology) with the addition of a requirement to take into account any needs that cannot be met within neighbouring areas. In general, the parameters originally agreed by the working group remain valid and Horsham District Council has continued to follow this approach. However since the publication of the revised NPPF, Horsham District Council has slightly amended the parameters, in order to be consistent with updates in national guidance and to appropriately inform the plan making process for the District. The parameters are set out in detail below;

Sites falling below the SHELAA threshold

- 4.10 Any site considered to have an estimated yield falling below a threshold of 5 dwellings⁸ and 0.25ha (or 500m² of floor space) for economic development, has been excluded from the assessment. A minimum threshold of five dwellings per site accords with the Government recommendation of ‘five or more dwellings’⁹ and aligns with the nationally set threshold for the inclusion of sites in the Brownfield Register. Prior to the 2018 SHELAA the threshold had been 6 dwellings to align with the annual Housing Land Supply Assessment undertaken by West Sussex County Council (WSCC).

Land Designations

- 4.11 Members of the West Sussex HMP Group agreed that sites falling exclusively within the following land designations should be excluded from the SHELAA.

⁸ Previous SHELAA's set a threshold of 6 dwellings in accordance with the Working Group's agreed approach.

⁹ ID 3-Housing and Economic Land Availability Assessment Planning Practice Guidance

Table 3: Areas of land to be excluded from the SHELAA¹⁰:

<ul style="list-style-type: none"> • Sites of Special Scientific Interest • Special Protection Areas • Scheduled Monuments • Registered Parks and Gardens • RAMSAR sites

4.12 These excluded sites represent areas which are formally protected for international, national, regional or local environmental, nature conservation or historical reasons. These designations form only a small proportion of the total area of the district (7.07%) therefore, it was envisaged that sufficient land could still be included, capable of meeting the needs of the District without necessitating the inclusion of highly sensitive locations of this nature. Table 4 provides the area figures for the excluded designations.

Table 4: Excluded designations

Designation	Total Area (km ²)	Percentage of District Area ¹¹
Site of Special Scientific Interest (SSSI)	14.61	2.75
Special Protection Area (SPA) ¹²	5.30	1.0
Scheduled Ancient Monument (SAM)	1.55	0.29
Historic Park and Garden	21.38	4.03
RAMSAR site ¹³	5.30	1.0
TOTAL	42.84	7.07

4.13 **South Downs National Park:** From the 1st of April 2013 the South Downs National Park Authority began directly receiving all SHELAA site submissions within its area. The details on sites within the SDNP were therefore transferred over to the National Park Authority and all SHELAA sites within the National Park boundary were excluded from the HDC SHELAA.

¹⁰ Please note 'Scheduled Monuments' were formerly titled 'Scheduled Ancient Monuments' and 'Registered Parks and Gardens' were formerly titled 'Historic Parks and Gardens'.

¹¹ Total Area of HDC is 530.93km²

¹² In HDC the only SPA site is also designated as an RAMSAR and a SSSI. The figures in the SPA category have not therefore been included when calculating the total areas / percentages, as to do so would constitute double counting.

¹³ In HDC the only RAMSAR site is also designated as an SPA and a SSSI. The figures in the RAMSAR category have not therefore been included when calculating the total areas / percentages, as to do so would constitute double counting.

- 4.14 **Other Designations:** Other designations which were considered for exclusion were flood risk areas, Sites of Nature Conservation Importance (SNCI's) and areas of Ancient Woodland. Although development in these locations is not preferable, it may, in some limited instances be possible to appropriately mitigate adverse impacts through development layout and design; therefore sites containing small areas of these designations were permitted within the assessment. That said, these designations have been noted as a potential constraint, meaning the viability of certain sites could be impacted due to the additional remediation / site preparation costs needed to mitigate any impacts. Sites wholly within any of the designations would be excluded from the SHELAA, except in exceptional circumstances, as they would not be considered suitable for development.

Completed Sites / Sites No Longer Available:

- 4.15 Where the developable area of a site has been built out and completed the site has been excluded from the assessment. The compilation of the list of sites within the SHELAA commenced in 2009. Since then the aspirations of some of the landowners has changed and also landownership. This means a number of sites may no longer be 'available' and as a consequence some are no longer realistically achievable, particularly those in an isolated location in the countryside. The 2018 SHLAA has therefore excluded any site which is clearly no longer promoted by the landowner(s) except where the exclusion of the site would appear incongruous with the identified potential in the area and the constraints.

Duplicate sites:

- 4.16 The SHELAA commenced in 2009 and since then the promoted land parcels have varied. Landowners may promote their site as well as promote it within a wider site with other landowners. To avoid double counting, the published SHELAA seeks to include land once this means that there may be some promoted 'sites' that have been excluded on the premise they 'duplicate' a section of a wider site or a combination of sites detailed in the published SHELAA.

Boundary Refinements:

- 4.17 In a number of cases site boundaries have been altered to accord with updates in the way a site is promoted. This normally results in a site being split up into two or more sites. However in a small number of cases the land promoted is reduced in size. For example, to reflect refinements in proposed broad locations / new settlement boundaries. The land removed following such boundary amendments is no longer captured by the SHELAA, not even as excluded land.

Remote Sites

- 4.18 Sites severely separated from the edge of villages or towns in the District have also been assessed as having nil housing potential due to their lack of proximity to existing services and facilities, meaning they represent an unsustainable form of development in a countryside location that would not be in accordance with paragraph 78 of the National Planning Policy Framework (NPPF) or overarching strategy of the HDPF. Rather than exclude these sites from the assessment, they are considered 'Not Currently Developable'.

Identification of sites and broad locations

- 4.19 Sites within the SHELAA have been identified through a wide variety of sources as identified in Table 5.

Table 5: Sources of sites with potential for housing and economic development

Sites identified by the Council/ Parish Councils
<ul style="list-style-type: none">• Land allocated for land uses which are no longer required for those uses;• Housing allocations and site development briefs (CP4, CP9, SSAL);• Employment allocations identified through SSAL 2007;• Sites with unimplemented planning permissions for housing or economic development;• Planning permissions for housing that are under construction;• Planning permissions for employment, retail land that are under construction;• Refused applications - whilst a site may have been refused permission, it has still been included as it may be possible to overcome that reason(s) for refusal at a later stage. For example, an application may have been refused

<p>previously on the grounds of density, meaning an application for fewer units on the same site could be feasible</p> <ul style="list-style-type: none"> • Vacant and derelict land and buildings; • Surplus public sector land; • Land in non-residential use which may be suitable for re-development such as commercial buildings; • Additional housing opportunities in established residential areas, such as under-used garage blocks; • Sites identified in Neighbourhood Development Plans which have reached Regulation 14 stage¹⁴.
Submitted Sites
<ul style="list-style-type: none"> • Sites submitted to the Council by individuals, landowners, agent or parish/neighbourhood councils. • A 'Call for Sites' was undertaken between 15 June 2018 and 27 July 2018 and all known lead contacts for SHLAA sites were notified and details published on the District Council's website.. • Targeted consultation was undertaken with the Parishes and Neighbourhoods in 2014 to identify sites for the SHELAA and to feed into neighbourhood plans • Details on the SHELAA together with a site assessment form have also been available on the Council's website since 2009.
Broad locations of search
<ul style="list-style-type: none"> • Large scale redevelopment and re-design of existing residential areas; • Sites in adjoining or rural settlements and rural exception sites; • Sites adjoining neighbouring authority areas; • Potential urban extensions; and • New free standing settlement options.

Sites identified by the Council

Early Identification of Sites

- 4.20 An initial desktop search was undertaken in 2009 to identify potential housing sites for inclusion within the SHELAA. This review used the following sources of data to identify sites. A minimum yield threshold of 6 units¹⁵ was applied to the search process as per the parameters agreed with the Northern West Sussex HMP.

¹⁴ Prior to the 2018 SHELAA the assessments only included sites which had reached Regulation 16 stage.

¹⁵ Please note: in 2018 HDC amended the threshold and as a consequence a threshold of 5 units was applied in the 2018 assessment of sites, and will be applied thereon.

Table 6: Initial data sources for site identification

Document Title/ Data Source
<ul style="list-style-type: none"> • Vacant and derelict land and buildings • Site specific development briefs • Planning application refusals • Urban Housing Potential Study 2004 – 2018 • Site Specific Allocations of Land DPD (2007) • National Land Use Database • Reserve Housing Sites • Employment Land Review • Sites submitted by stakeholders via the SHELAA consultation process • Economic Land Review, 2012 • Horsham Town Brownfield Site Capacity Study, 2014 <p>Since then further documents have been used to identify sites including the:</p> <ul style="list-style-type: none"> • 2014 Economic Growth Assessment and its 2015 Supplementary Report; • 2014 Horsham Town Brownfield Site Capacity Study; • 2018 Local Plan Review Issues and Options; and • Emerging Neighbourhood Development Plans

Neighbourhood Development Plans

- 4.21 Sites from the emerging Neighbourhood Development Plans (NDP's) have been taken into account within the SHELAA assessment if the emerging plan has been subject to formal consultation under regulation 14 of the Neighbourhood Planning (General) Regulations. Sites identified through NDP's have been considered in this assessment in terms of their suitability, availability and achievability in the same way that other sites within the SHELAA have been.
- 4.22 The classification of these sites follows the same methodology in that, only those Neighbourhood Plan sites which have been allocated in a 'Made Plan', granted planning permission or which have an application submitted where the Council consider the site to be in a suitable location and achievable within the first five years, have been assessed as green. Where an application has yet to be submitted or the NDP is yet to be made, the site remains yellow or red until deliverability can be demonstrated.

- 4.23 In addition, the potential capacity of the neighbourhood plan site remains subject to the judgement of the District Council until the Neighbourhood Plan has been made. At this point the capacity agreed in the Made Plan is used.
- 4.24 At present there are five Neighbourhood Development Plans in Horsham District which have been 'Made' (Nuthurst, Shermanbury & Wineham, Slinfold, Thakeham, and Woodmancote). In addition to this there are two Neighbourhood Development Plans which have reached Regulation 16 stage (Warnham, and Storrington Sullington & Washington); and three which have reached Regulation 14 stage (Southwater, West Chiltington, and Upper Beeding);

Greenfield / Brownfield Land

- 4.25 The identification of sites for inclusion within the SHELAA has been extensive and includes both greenfield and brownfield (previously developed) land which could be improved, intensified or changed. Where a site has particular development constraints, the constraints have been clearly documented and, where proportionate to do so, a description of how this constraint could be overcome if appropriate.
- 4.26 The definition of Previously Developed Land (PDL) that was used as part of this process is derived from Annex 2: Glossary of the 2012 National Planning Policy Framework (NPPF)¹⁶, which remains fundamentally unchanged in the revised NPPF, and confirms the following:

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent

¹⁶ Please note: this definition remains in the 2018 NPPF albeit with a few minor changes in the text

structure or fixed surface structure have blended into the landscape in the process of time.”

- 4.27 Whilst policies in the adopted HDPF seek to make optimal use of previously developed land, it is not possible to accommodate all future development on this land given the predominantly rural nature of the district and the number of houses the Council have to provide. The SHELAA, therefore provides a basket of potential greenfield sites and brownfield sites which could be considered for future planning purposes.
- 4.28 The Horsham Town Brownfield Site Capacity Study, undertaken in July 2014, assessed the housing potential of a range of office sites within Horsham town centre which had previously been considered ‘not currently developable’. The study identified that of the 67 sites assessed, 14 sites were considered suitable for residential development, freeing up the potential for a further 469 units spreading across years 1-5, 6-10 and 11+. This information has now been added to the SHELAA and the capacity work included in the trajectory.

Submitted sites

- 4.29 Submitted sites include those submitted to the council by an external body such as a landowner, agent or parish council. Information is collected via a Site Assessment Form, available to download from the Council’s website. This form is used to record specific information about the site and its constraints, together with the contact details of landowners and/or developers promoting the site. Each site is then mapped at a suitable scale, (usually on a 1:1250 map base) in preparation for the site surveys.
- 4.30 A number of ‘Call-for-Sites’ have been undertaken, where third parties were asked to submit sites they would like to see included in the assessment. The most recent call for sites ended on the 27 July 2018.
- 4.31 The ‘Call for Sites’ process includes consultation with both Parish and Neighbourhood Councils. Each Parish has its own ‘pack’ which contains details of the existing SHELAA sites within the Parish boundary. During a ‘Call for Sites’ consultation information is provided on how to submit additional details on existing sites and alternative sites. The engagement of Parishes and

Neighbourhood Councils in the process has been seen to be successful with a further 80 sites identified by the parishes during 2014 and an additional 100 during the course of 2015. Many of which have been used to inform the basis of many emerging neighbourhood development plans.

- 4.32 In addition to the parish consultation; stakeholders who had submitted sites previously to the SHELAA are contacted to identify whether they wanted those sites to remain in the SHELAA, and if so, whether they had any additional information that could help with the updated assessment of the site.
- 4.33 It is possible for landowners, agents and developers to submit site information at any time via the SHELAA Site Assessment pro-forma available to download from the Council's website. The Site Assessment pro-forma is used by the Council to record the specific details of each site, including the constraints and opportunities.
- 4.34 All of the sites submitted to the Council for inclusion within the 2016 SHELAA have been visited and full site assessments have been undertaken. Sites submitted since then have either been visited and/or assessed via google earth/aerial photographs and the council mapping system. The site surveys are proportionate to the detail required for a robust SHELAA level appraisal. Table 7 summarises the information collected for each site.

Table 7: Information to be collected and stored for each site.

Site Characteristics	Site Size
	Site Boundaries and location
	Current land use(s)
	Surrounding land use(s)
	Character of surrounding area (i.e. rural, urban etc)
Constraints and ways to alleviate them	Physical constraints, e.g. access, contamination, topography, flood risk, natural features of significance.
	Environmental constraints e.g. landscape, biodiversity, historic environment, noise levels, trees
	Planning Policy Constraints, e.g. land use designations, site allocations
	Infrastructure constraints, e.g. impact on highways, proximity to public transport

Development Progress E	Ground works complete/ homes started / site built out
	Total number of units proposed/permitted
Suitability & Deliverability	Assessment of whether the site is suitable for housing, including where applicable as part of a mixed use development. A proportionate assessment of land preparation costs A proportionate assessment of viability and deliverability A summary of land ownership / control of site
	Likely timescale for commencement of development Identification of barriers to development and how they can be overcome

Economic Land Assessment

- 4.35 In the November 2015 SHELAA Report the breadth of sites included in the assessment was expanded to include sites suitable for economic development (in accordance with national guidance issued in 2014). This included a review of the District's annual Commercial and Industrial Land Assessment (CILLA) information provided by West Sussex County Council to obtain an understanding of the economic sites committed, available or in course of construction. These sites were added to the SHELAA database and site visits were undertaken to identify whether these employment areas were at capacity or could be expanded / uses intensified.
- 4.36 A full assessment of the potential economic land availability was undertaken in April 2018 as the first element of the 2018 SHELAA release. It includes a full assessment of economic sites having regard to their suitability, availability and achievability.

Broad Locations

- 4.37 Broad locations are areas where housing developments may be considered feasible and could potentially be encouraged, but where specific sites cannot yet be identified.

4.38 It is a proactive approach to planning, which reflects positive choices about the direction of future housing developments, rather than a reactive approach to development opportunities as they arise. Examples of broad locations include:

- **Within and adjoining settlements** – for example, areas where housing developments are or could be encouraged and small extensions to settlements; and
- **Outside settlements** – For example, major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns.

4.39 As part of the preparation of the HDPF, the Council identified a number of broad locations for potential housing growth which included the sites listed below:

1. West of Ifield
2. Greater Faygate
3. Land North of Horsham
4. Chesworth Farm, Horsham
5. West of Southwater
6. East of Billingshurst
7. Adversane/North Heath
8. New Market Town

4.40 The capacity and deliverability of these sites is discussed in more detail in Appendix 1. Due to the size and potential capacity of the broad locations of search, it was decided to consider these sites on a sub-regional basis, as a way of identifying the housing needs of the Northern West Sussex housing market area. A joint assessment of all sites over 500 units was therefore carried out which informed the HDPF adopted in 2015 and the assessment process is documented in Appendix 1.

4.41 The Broad Locations will be reviewed together with any other broad locations which may emerge through the SHELAA process, in order to inform the Local Plan Review, which is expected to be subject to Regulation 18 consultation in Autumn 2019.

Stage 2: Site / Broad Location Assessment

- 4.42 The housing potential of a site refers to the net number of dwellings that the site can be assumed to accommodate through its development or conversion of existing buildings. The housing capacity for each site was assessed applying guidance provided in the former 2012 National Planning Policy Framework (NPPF) and criteria such as the size of site; floor area; availability of suitable infrastructure; suitability of location; any necessary remediation costs or environmental mitigation and proximity to existing services. Updates apply the 'Housing and Economic Land Availability Assessment' guidance.
- 4.43 The initial figure for each site was based upon a density of 40 dwellings per hectare (dph). This clear, concise figure enabled easy comparisons between all sites, regardless of any site specific constraints. The figure was then revised based upon the information gathered during the site assessment according to site specific criteria. For example, for a purely residential site within a built-up high density residential area, it was often appropriate to increase the density. If the site has constraints such as Tree Preservation Order's (TPO's) or was a mixed use scheme in a lower density housing area, then the figure would be lowered to reflect these individual characteristics. In some instances it was preferable to compare the density to similar existing development within the same location. This was particularly useful when assessing the capacity of unused office sites.
- 4.44 It should be noted that the Assessment does not pre-empt or prejudice any planning decision made in the future on any particular site and the assumptions made on densities or indicative yields should not be taken outside of the context of the SHELAA.

Factors to be considered when assessing whether sites or broad locations are likely to be developed

- 4.45 Paragraph 73 of the NPPF (2018)¹⁷ requires Local Planning Authorities to "identify and update annually a supply of specific deliverable sites sufficient to

¹⁷ This updates the former 2012 NPPF, paragraph 47, which stated "identity and update annually a supply of specific 'deliverable' sites sufficient to provide five years' worth of housing against their housing requirements....and a supply of 'developable' sites or broad locations for growth for housing over the longer term".

provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old." Paragraph 67 makes clear planning policies should "identify a supply of specific, deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

- 4.46 The NPPF (2018) Glossary updates the footnotes to paragraph 47 in the former NPPF (2012) and provides the following definitions for deliverable, and developable sites, which are similar to the former definitions:

Deliverable: To be considered deliverable, sites for housing should be *available* now, offer a *suitable* location for development now, and be *achievable* with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Developable – To be considered developable, sites should be in a *suitable* location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 4.47 If it is unknown when a site could be developed, then it will be regarded as '**not currently developable**', this could be, for example, because of severe constraints to development and not knowing when or if they might be overcome.
- 4.48 The assessment criteria for determining whether a site is to be considered *suitable*, *available* or *achievable* is summarised below:

Assessing “suitability” for housing

4.49 Factors which make a site suitable for housing development include consideration of constraints which may impact development such as;

- The development plan, emerging planning policy and national planning policy;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Landscape and character of the surrounding area;
- The natural and historic environment (including listed buildings);
- Neighbouring amenity and particularly noise constraints;
- Flood risk;
- Ground conditions, pollution and contaminated land;
- Hazardous risks;
- Protected trees;
- Biodiversity constraints;
- Accessibility and proximity to local services;
- Public Rights of Way; and
- Supporting infrastructure.

Assessing “availability” for housing

4.50 The SHELAA Planning Practice Guidance makes clear that for a site to be considered available for development there needs to be confidence that there are “no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners”. An available site is classified as such if it is under the control of a housing developer who has expressed an interest to develop or a landowner who has expressed an intention to sell.

4.51 The following issues have therefore been taken into consideration when assessing the availability a site for housing development:

- ownership and/or control of the land;
- intention of the landowner to deliver;

- planning status and planning history of the site;
- potential legal constraints / ownership problems; and
- the timescales required to bring a site forward.

4.52 A secondary issue to consider when assessing availability is the timescales required to overcome any identified constraints. In the majority of cases, sites included in the first five years are those with full planning permission or allocated and with a firm commitment by the developer to bring the site forward for development. If a constraint to the development exists but it is considered that this constraint could be overcome in the longer term, then the site is classified as 'available' but developable in the longer term 6-10 or 11+ years, depending on the nature or complexity of the constraints on the site.

4.53 The availability of the majority of sites has been established by contacting the developers / land owners and checking relevant planning history to help understand the planning status of the land. Where problems have been identified, an assessment has been made as to how those problems could be realistically overcome. This has been based upon details provided from the land owner(s), the professional judgement of the planning officers on the basis of local knowledge and information collected during site visits. In addition, if the background to a site shows a history of un-implemented permissions, then this has been taken into consideration when assessing deliverability.

Assessing “achievability” for housing

4.54 The assessment of whether a site is achievable or not is based on a judgement about the economic viability of the site, coupled with the ability of a developer to complete and let/sell the scheme within a given time period. The assessment of a site's *achievability* takes into account the following factors:

- **Market Factors** such as:
 - The effects that adjacent land uses may have on site;
 - The attractiveness of the locality;
 - Potential marketability of the site.
- **Cost Factors** including:
 - Site preparation costs and/or exception costs;

- Affordable housing provision;
- Highways improvement works;
- Access issues and impact on Strategic Road Network;
- Third party land requirements;
- Availability and capacity of local utilities/connection costs.
- **Delivery Factors** including;
 - An assessment of projected build out rates;
 - Single or multiple developers;
 - Size & capacity of the developer;
 - Is third party land required?

4.55 For a site to be considered achievable, and therefore deliverable, there should be a 'reasonable' prospect that housing will be delivered on the site at a given point in time. In essence, this is a judgement about the economic viability of the site and the ability of the developer to complete and sell housing over a certain period. If there is clear evidence that sites with planning permission will not be implemented before the permission lapses, then it would not be identified as achievable or deliverable.

4.56 In order to feed into the assessment work for the HDPF, the Council commissioned a viability appraisal to investigate whether each of the individual SHELAA sites was considered viable on a 'traffic light' red, green, amber approach in light of their projected development trajectory for the examination of the HDPF. This information was then added to the SHELAA database and used to inform the final assessment of each site.

4.57 A similar proportionate approach has been adopted in subsequent SHELAA updates. Each site in the SHELAA has been assessed against the criteria above to determine whether it is *suitable, available and/or achievable*. The information is then used to determine whether the site should be classified as 'Deliverable', 'Developable' or 'Not Currently Developable' for housing development. A summary of each site assessment for housing potential is available in Appendix 3, together with a map delineating the boundary for each site.

Overcoming constraints

- 4.58 Where constraints have been identified the assessment may include a review of what further actions would be necessary to remove them. Such actions included; investment in infrastructure, dealing with fragmented land ownership, environmental improvement or a need to review development plan policy if it is constraining development.

Assessing timescales and rate of development

- 4.59 Once the initial stages of the assessment have been undertaken and an assessment of deliverability and developability have been made, the housing potential of all sites is collated to produce an indicative housing trajectory, setting out how much housing could potentially be provided in the District and at what point in the future it is likely to be delivered. This work also includes a risk assessment to consider whether sites would come forward as anticipated. If a site is found unlikely to be delivered within the anticipated timescale calculated using the methodology set out in earlier chapters, then the classification of the site is changed to reflect the most likely delivery rate. The SHELAA trajectory is presented in Table 12 in this report and categorises the availability of potential sites into five year blocks:

- 1-5 years (2019 –2023) - Green;
- 6-10 years (2024 – 2028) - Yellow; and
- 11+ years (2029 -2033) -Yellow.

- 4.60 Sites which are unlikely to come forward within fifteen years have been classified as 'not currently developable' and have not been included in the trajectory work. These sites are listed under the appropriate parish heading in Appendix 3 with a commentary explaining why they are considered not developable at the present time. It should also be noted that the plan period of the HDPF is to 2031, however, the Inspector who undertook the independent examination of the HDPF indicated that a review of the plan should commence within three years to ensure that wider long term needs in the District could be met. The Local Plan Review commenced in April 2018 with the 'Issues and Options: Employment, Tourism and Sustainable Rural Development'.

- 4.61 The 2018 SHELAA has taken a 'policy on' approach, meaning existing local planning policy has been taken into account. Using the 'policy on' approach, relatively few sites have been assessed as suitable, available and achievable later on in the plan period, for which further more detailed assessment will need to take place as part of the wider local plan review process.
- 4.62 It is also important to note that the SHELAA is a live document and regularly subject to review. Future iterations will therefore reflect proposed allocations in the Local Plan Review. Those allocations will address delivery looking further forward, up to 2036. More sites are showing in the 2018 SHELAA as 'Not Currently Developable' than developable. There are 192 'available' sites (in total 1,783 hectares) that are currently assessed to be 'Not Currently Developable', but which may be assessed as suitable allocations in a future Local Plan. There is not therefore a lack of sites and the District is able to meet its five year housing land supply. It is hoped however that by taking a 'policy on' approach in the 2018 SHELAA it will help to ensure communities and developers engage in the Local Plan Review and therefore facilitate the allocation of appropriate sites through the plan making process.
- 4.63 As has already been stated, it is emphasised that the inclusion of a site within the SHELAA assessment does not imply that the site will automatically be granted planning permission. The SHELAA is a technical document used to identify a portfolio of development sites which may be considered for future planning purposes. The final decision as to whether a site should be granted planning permission will always be decided through the planning application process.

Findings:

- 4.64 The NPPF requires Local Planning Authorities (LPAs) to identify and update annually a supply of specific 'deliverable' sites sufficient to meet five years' worth of housing against their housing requirements, with an additional 5% buffer (moved forward from later in the plan period) to ensure choice and competition in the market. LPA's are also expected to identify specific 'developable sites' or broad locations for growth sufficient to meet the needs of years 6-10 and where possible years 11-15 to inform planning policies.

- 4.65 The housing requirement for Horsham District is currently set at 800 dwellings per annum (dpa), as set out in the Horsham District Planning Framework, 2015 (HDPF). This number equates to a five year requirement of 4,000 units.
- 4.66 Adding on an additional 5% buffer to ensure choice and competition in the market taking into account the outstanding requirement from 2011-2018 (60 units), as required under paragraph 73 of the NPPF and guidance, the District's housing requirement for the next 5 years is 4,263 units (4060*1.05 [5% buffer on: 5x800 + outstanding requirement 2011-2018 of 60 units]) and a further 4,000 units for years 6-10 and 11-15 thereafter.
- 4.67 A review of the SHELAA assessment identified 76 sites which are likely to deliver 4,539 units within the next five years of the plan (2019 – 2023). These sites comprise land which has either been allocated in the HDPF or in the 'Made' Neighbourhood Development Plans (namely Nuthurst, Shermanbury & Wineham, Slinfold, Thakeham, and Woodmancote), or have been granted planning permission or in a small number of cases, where an application has been submitted and the site is considered by Officers to be suitable and achievable. Sites which are likely to come forward in the first five years are classified as 'Deliverable' (green) and are listed in Table 8. The list includes, in part, the two strategic development locations at Land West of Horsham (SA281 and SA283) and Land West of Bewbush (Kilnwood Vale) (SA289) and the allocated strategic site at Land North of Horsham (SA296). It should be noted that the build out period for these strategic sites extends beyond the current 5 year period as discussed in later paragraphs:

Table 8: Sites which are considered deliverable 1-5 years

Parish	SHELAA Ref	Site Name	Capacity 1-5 years
Billingshurst	SA108	South of Billingshurst Allocation	51
Billingshurst	SA162	Land south of Roman Way	45
Billingshurst	SA362	Kingslea Farm, Marringdean Road	77
Billingshurst	SA412	East of Billingshurst	492
Billingshurst	SA603	Land at Rowan Drive Garage Billingshurst	9
Billingshurst	SA687	Land at Little Gillmans Cottage	13

Broadbridge Heath	SA072	Land north of Old Guildford Road Broadbridge Heath	96
Broadbridge Heath	SA281	Land West of Horsham (W) - Wickhurst Green	45
Broadbridge Heath	SA580	Land North of Heath Barn Farm	49
Broadbridge Heath	SA659	Garage Block, Sleets Road	9
Broadbridge Heath	SA660	Garage Block, Swann Way	9
Broadbridge Heath	SA680	Land at Hares Hill	8
Colgate	SA007	Former Agates Sawmill, Faygate	29
Colgate	SA289	Land West of Bewbush (Kilnwood Vale)	913
Colgate	SA495	Durrants Village	17
Cowfold	SA523	The Coach House	9
Henfield	SA004	Land at Junction of Stonepit & West End Lane	75
Henfield	SA160	Land east of Manor Close	11
Horsham Denne	SA143	Lifestyle Ford and Bishops Weald	53
Horsham Denne	SA164	1st Floor, Freshwater Parade	6
Horsham Denne	SA200	14 - 15 West Street	6
Horsham Denne	SA283	Land West of Horsham (East) (Berkeleys)	388
Horsham Denne	SA436	Former Horsham District Council Offices	103
Horsham Denne	SA449	Norfolk House	20
Horsham Denne	SA453	Prewetts Mill	59
Horsham Denne	SA472	The Firs	1
Horsham Denne	SA490	Envision House 5 North Street Horsham	23
Horsham Denne	SA577	Peel House	14
Horsham Denne	SA586	25 Piries Place	7
Horsham Denne	SA602	41, 43 and Land To Rear of 45 Longfield Road	6
Horsham Denne	SA664	Garages at Pelham & Waverley Court	21
Horsham Forest	SA199	Century House	49
Horsham Forest	SA525	Queens Head	9
Horsham Forest	SA557	Land at 40 Brighton Road (Dairy Crest Site)	14
Horsham Forest	SA661	Winterton Court, Horsham	38
Horsham Forest	SA695	1A Clarence Road Horsham	5
Horsham Trafalgar	SA176	Albany House	10
North Horsham	SA139	9-13 Crawley Road	15
North Horsham	SA296	Land North of Horsham, Strategic Site	200
North Horsham	SA533	The Fountain Inn	5
North Horsham	SA582	The Pavilion Graylands Estate	7
North Horsham	SA605	Scout HQ site, Peary Close	8
North Horsham	SA638	Land at The Holbrook Club, Jackdaw Lane	58
North Horsham	SA688	Novartis Pharmaceuticals Site (North)	28
Nuthurst	SA258	Land opposite The Dun Horse, Mannings Heath	8

Nuthurst	SA303	Land at Great Ventors Farm	10
Nuthurst	SA328	Land at Saxtons Farm	6
Nuthurst	SA371	Holly Farm	5
Nuthurst	SA405	Land adjacent to Heathtolt Cottages	8
Pulborough	SA036	Land at Stane Street, Codmore Hill	119
Pulborough	SA593	Land off Stopham Road	23
Pulborough	SA706	Ransoms Pulborough	9
Rudgwick	SA151	Land at Windacres Farm	55
Rusper	SA468	Land off Rusper Road (Emmanuel Cottage)	95
Rusper	SA583	Former Longfield House	8
Rusper	SA713	Storage Buildings at Sports Horses International Ltd Stud Farm	5
Shermanbury	SA594	Barmarks	20
Shipley	SA342	Land at Hogs Wood, Mill Straight	166
Slinfold	SA019	Land west of Spring Lane	10
Slinfold	SA337	Land East of Hayes Lane	30
Slinfold	SA654	Land at Crosby Farm, Slinfold	24
Slinfold	SA655	The Cobblers	13
Southwater	SA128	Old Goods Yard / King Edwards Close	47
Southwater	SA413	Land West of Southwater	401
Storrington and Sullington	SA086	Storrington Glebe	9
Storrington and Sullington	SA518	Robell Way ('Paula Rosa')	90
Storrington and Sullington	SA673	Storrington Squash Club	8
Storrington and Sullington	SA748	Land at Ravenscroft Allotments	35
Thakeham	SA012	Thakeham Tiles	50
Thakeham	SA114	Abingworth Farm and Nursery	115
Thakeham	SA339	Land east of Threals Lane,	8
Warnham	SA163	Warnham Glebe & Vicarage	14
Warnham	SA368	Land at Northlands Road	6
Washington	SA764	Former Highway Depot London Road Washington	5
West Chiltington	SA671	Land at Steele Close and at Sinnocks	15
West Grinstead	SA447	Blakers Yard Dial Post	12
TOTAL 1-5 Years			4,539

4.68 The assessment also identified 52 sites which have the potential to deliver 3,616 units between years 6-10 (2024-2028). These sites include, in part, one of the two strategic development locations at Land West of Horsham (SA283) and Land West of Bewbush (SA289) and the allocated strategic site at Land

North of Horsham (SA296). These sites are classified as ‘Developable’ (yellow) and are listed in Table 9.

Table 9: Sites considered developable 6-10 years

Parish	SHELAA Ref	Site Name	Capacity 6-10 years
Ashington	SA085	Ashington Glebe Land	20
Ashington	SA131	Chanctonbury Nurseries	77
Ashington	SA364	One Acre, North of Foster Lane	18
Billingshurst	SA030	Eagle Industrial Estate, Brooks Road	12
Billingshurst	SA032	Nyewood Court	18
Billingshurst	SA034	Gas Works, Natts Lane	30
Billingshurst	SA292	Land adjacent to Cedars Farm Parbrook	10
Billingshurst	SA437	Land south of A29 at Jubilee Fields	20
Colgate	SA289	Land West of Bewbush (Kilnwood Vale)	900
Cowfold	SA083	Cowfold Glebe	6
Cowfold	SA682	Land at Cedar Leas	5
Henfield	SA011	Land West of Backsettown Farm	25
Henfield	SA423	The Bus Station	7
Henfield	SA504	Land South of Bowls Club, off Furners Mead	10
Henfield	SA505	Highdown Nurseries, off Shoreham Road	10
Henfield	SA511	Village Stores	6
Henfield	SA515	Old Steam Mill	8
Henfield	SA554	Post Office & Library Car Park, off High Street	6
Horsham Denne	SA165	The Tanfield Centre	16
Horsham Denne	SA175	Barclays House	12
Horsham Denne	SA198	West Point	18
Horsham Denne	SA283	Land West of Horsham (East) (Berkeleys)	245
Horsham Denne	SA672	St Marks Court	203
Horsham Forest	SA728	Land at Ben’s Acre	6
Lower Beeding	SA567	Land at Glayde Farm, West of Church Lane	8
Lower Beeding	SA575	Land North of Sandygate Lane	20
North Horsham	SA145	Roffey Sports and Social Club	70
North Horsham	SA285	Old Pumping Station	30
North Horsham	SA296	Land North of Horsham, Strategic Site	1,200
Nuthurst	SA553	Land behind White Horse Public House	6
Nuthurst	SA709	Land at Little Homefield	6
Pulborough	SA445	Land adj Drovers Lane (New Place Farm)	50
Rudgwick	SA434	Land at Junction of Church St/Watts Corner	12
Rudgwick	SA442	Land to the West of Church Street	18

Rusper	SA080	Rusper Glebe	12
Slinfold	SA696	Welwyn Slinfold	13
Southwater	SA413	Land West of Southwater	137
Steyning	SA762	Former Lloyds Bank Steyning	5
Storrington and Sullington	SA153	RAFA site	15
Storrington and Sullington	SA549	Land at Old Mill Drive ('The Diamond')	20
Storrington and Sullington	SA550	Land at the Post Office Depot	10
Storrington and Sullington	SA561	Angell Sandpit	6
Storrington and Sullington	SA618	Land North of Downsview Avenue, Storrington	60
Upper Beeding	SA055	Land at Smugglers Lane, Upper Beeding	25
Upper Beeding	SA483	Land East of Pound Lane	25
Upper Beeding	SA488	Land at Little Paddocks Pound Lane	20
Warnham	SA070	Land north of Bell Road	20
Warnham	SA071	Land south of Bell Road	20
Washington	SA519	Land at Old London Road (The Vineyard)	15
West Chiltington	SA066	Land at Hatches Estate	15
West Grinstead	SA274	Land north of the Rise	40
West Grinstead	SA320	Land West of Church Road Partridge Green	50
TOTAL 6-10 Years			3,616

4.69 Finally the assessment identified 33 sites which have the potential to deliver a further 2,658 units in the following 11+ years (2029 onwards). Again these sites include, in part, the strategic development location at Land West of Bewbush (SA289) and the allocated Land North of Horsham (SA296). These sites are classed as 'Developable' (yellow) 11+ years. The developable 11+ sites are listed in Table 10:

Table 10: Sites considered developable 11+ years

Parish	SHELAA Ref	Site Name	Capacity 11+ years
Ashington	SA539	Land North of Glebe Farm, Ashington	60
Billingshurst	SA560	Land off Marringdean Road	50
Billingshurst	SA607	Land at Kingsfold Cottage, Marringdean Road	22
Broadbridge Heath	SA137	Station Garage (Skoda)	45

Colgate	SA289	Land West of Bewbush (Kilnwood Vale)	300
Cowfold	SA609	Field West of Cowfold, North of A272	35
Cowfold	SA610	Fields West of Cowfold, South of A272	15
Cowfold	SA611	Field W of Cowfold, S of A272, W of Little Potters	6
Henfield	SA065	Land at Wantley Hill	40
Henfield	SA446	Vinalls Business centre and NR Motorworks	12
Henfield	SA487	Land south of Hollands Lane	14
Horsham Denne	SA450	Hurst Road Opportunity Area	200
Lower Beeding	SA584	Land south of Church Farm House	6
North Horsham	SA138	137 Crawley Road	21
North Horsham	SA144	Parsonage Farm	127
North Horsham	SA296	Land North of Horsham, Strategic Site	1,250
North Horsham	SA530	The Rising Sun	6
North Horsham	SA604	Land at Holbrook School Lane, Horsham	5
Nuthurst	SA420	Swallowfield Paddock, Mannings Heath	6
Pulborough	SA087	Pulborough West Glebe	8
Pulborough	SA556	Land at Highfields, Codmore Hill	25
Pulborough	SA641	Land at New Place Nurseries, Pulborough	100
Pulborough	SA767	Land South of Highfield, Codmore Hill	35
Rusper	SA630	Land West of Baldhorns Copse, Rusper	10
Rusper	SA737	Pucks Croft Cottage and Land South, Rusper	5
Storrington and Sullington	SA361	Land to the north of Melton Drive	40
Storrington and Sullington	SA485	Land south of Bax Close	20
Storrington and Sullington	SA486	Land adjacent to Clay Lane, Storrington	60
Storrington and Sullington	SA732	Land South of Northlands Lane, Storrington	30
Thakeham	SA039	Land North of High Bar Lane	20
Thakeham	SA513	Land to the south of Furze Common Road	20
West Chiltington	SA014	Land North of Finches Lane, West of Mill Road	5
West Grinstead	SA433	Land at Dunstans Farm	60
TOTAL 11+ Years			2,658

Stage 3: Windfall Assessment

- 4.70 The National Planning Policy Framework enables local planning authorities to make an allowance for windfall sites in their housing supply, including their five year supply, if they have compelling evidence that such sites will provide a reliable source of supply. Any allowance should be realistic having regard to the SHELAA, historic windfall delivery rates and expected future trends. Prior to the publication of the revised NPPF in July 2018 any windfall allowance was not to include residential gardens. The NPPF 2018 no longer applies this restriction but indicates plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area (NPPF, paragraph 70).
- 4.71 A windfall site is defined in the HDPF as “*a site not specifically allocated for development in the Local Development Framework which unexpectedly becomes available during the lifetime of a plan.*” The availability of a windfall site does not automatically mean that the site would be deliverable and counted towards the District’s five year housing land supply, as only sites which are considered ‘suitable’ and ‘achievable’ could be considered deliverable as defined by the NPPF.
- 4.72 Policy 15 of the HDPF identifies that of the ‘*unidentified sites which unexpectedly become available*’ in the District (i.e. windfalls), the Council project (based on historic evidence) that 750 of these units will be policy compliant, in a sustainable location, and be considered deliverable.
- 4.73 The Council undertook an analysis of the historic delivery of windfall sites which is presented in Appendix 2. This analysis shows that on average the authority have delivered 52 units per annum from windfall development since 2007/08. In accordance with the former NPPF 2012, paragraph 48, those sites which constituted development on garden land were discounted from this figure¹⁸. In reality the District believe its estimate of windfall is likely to be conservative as the Housing Trajectory presented in the Housing Chapter of the 2014/15 Mid-Year Annual Monitoring Report (AMR) demonstrated that the Council have maintained a consistent supply of completions on unallocated sites since 2011,

¹⁸ It should be noted that this restriction is not retained in the revised NPPF 2018, paragraph 70

with some years reaching over 300 completions. With a presumption in favour of sustainable development (when in accordance with the HDPF), there is no reason to believe it would not continue to form a notable part of the overall supply of new housing especially in view that the revised NPPF, published in July 2018, no longer excludes residential gardens.

Stage 4: Assessment Review

- 4.74 Once the sites and broad locations had been assessed, the development potential of all sites was collated to produce an indicative trajectory setting out how much housing could potentially be provided at given points in the future (1-5, 6-10 and 11+ year periods).
- 4.75 This section of the report presents the analysis of the SHELAA following the assessment of all sites surveyed by Horsham District Council since the beginning of the project until the cut-off date on the 26 October 2018 (or in respect of sites covered by the SSWNP, the 22 November 2018). A summary of all site assessments can be found in Appendix 3 together with a map identifying the boundary of each site and the classification of whether it is considered deliverable (green), developable (yellow) or not currently developable (red).
- 4.76 It should be noted that the classification of a site is based on the classification of the *developable* area within that site, therefore if part of a site is considered 'developable' – i.e. that it is likely to be delivered within years 1-5, then the whole of the site would be coloured green. This does not mean that the whole site would be developed, only that there is potential for some form of development to be delivered within the wider site boundary. Once an application has been permitted for a site, the site area is either re-drawn taking into account the application boundary or the number of units permitted is removed from the overall site total and the remainder of the site is assessed for its development potential. If no other portion of the site remains *developable* or *deliverable*, the remainder of the site is excluded or returned to 'Not Currently Developable' depending on the characteristics of the site.

Stage 5: Final evidence base

- 4.77 The NPPF requires local planning authorities to identify and update annually a supply of specific 'deliverable' sites sufficient to meet five years' worth of housing against their housing requirements with an additional 5% buffer to ensure choice and competition in the market.
- 4.78 Local Planning Authorities should also have an understanding of the land available in their area so that policies can identify a supply of specific developable sites or broad locations for growth, for years 6-10, and where possible, for years 11-15 of the plan.
- 4.79 The District's housing requirement is currently 800 dwellings per annum as set out in the adopted Horsham District Planning Framework (HDPF) document, 2015. A five year supply of housing with an additional 5% buffer equates to 4,263 units for the next 1-5 years, with an additional 4,000 units for years 6-10 and 11-15 thereafter.
- 4.80 An assessment of sites and broad locations within the SHELAA identified 4,539 dwellings were considered suitable, available and achievable for development within years 1-5 and 3,616 and 2,658 units respectively being available for development in years 6-10 and 11+ thereafter. Between the HDPF base date in 2011 to 31 March 2018 5,540 dwellings have been delivered. This reflects a sufficient number of sites to satisfy the District's objectively assessed housing need as set out through the Horsham District Planning Framework together with a 5% buffer taking into account the windfall allowance. The SHELAA sites contributing towards this supply are set out in Tables 8, 9 and 10. Please note that on some sites, particularly the broad locations, development may span over each of the five year blocks (1-5 years, 6-10 years and 11+). In these instances, development has been split according to likely deliverability and the site has been added to each list.
- 4.81 A list of all of the sites and broad locations considered in the 2018 Assessment, together with maps indicating their location, is available in Appendix 3. This Appendix also contains a summary of each site assessment providing a brief description on the sites suitability, availability, achievability and potential capacity.

- 4.82 Taking all of the above into consideration, the estimated total housing capacity of SHELAA sites to be delivered throughout the remainder of the plan period; years 1-5 (2019-2023) 6-10 (2024-2028) and years 11+ (2029+) is 10,813 units. This is summarised in Table 11.

Table 11: SHELAA Housing trajectory

Deliverable sites 1-5 years (green)	4,539
Developable sites 6-10 years (yellow)	3,616
Developable sites 11+ years (yellow)	2,658
TOTAL	10,813

SHELAA Trajectory

- 4.83 The following trajectory sets out the potential supply of housing taking into account the capacity of suitable SHELAA sites and windfall assumptions;

Table 12: SHELAA Housing trajectory incorporating windfall allowance

Time Period Estimated No. of Homes			
	SHELAA Capacity	Windfall allowance	Total Supply
2019-2023	4,539	150*	4,689
2024-2028	3,616	250	3,866
2029-2033	2,658	250	2,908
TOTAL	10,813	650	11,463

**Please note that windfalls are not included in the first two years as small site commitments are partly known. For example, planning permission would normally already be in place if a site is to be delivered within the next two years. The 5 year land supply of deliverable sites may therefore be greater than that shown above given that the SHELAA does not include sites delivering less than 5 dwellings.*

Consideration of Associated Risks

- 4.84 The District has demonstrated sufficient evidence to be confident that at least 50 units per year are likely to come forward through windfall development over the HDPF plan period. These sites are unidentified within the SHELAA. This

estimate is considered to be conservative and is based on the Council's analysis of windfall delivery and does not include sites approved on back garden land in order to be in compliance with the former NPPF which has now been replaced by the revised NPPF published in July 2018 and no longer specifically excludes residential gardens. With a presumption in favour of sustainable development (when in accordance with the HDPF), there is no evidence to suggest this rate of delivery will not continue into the future.

- 4.85 As can be seen from Table 12, taking the above into consideration the potential supply of identified sites considered 'deliverable' (1-5 years) or 'developable' (6-10 years) and the identified windfall allowance would yield 8,555 units. This is more than sufficient to meet a ten year supply of housing sites as required through the NPPF and demonstrates over 292 unit surplus (taking into account a 5% buffer). This offers sufficient flexibility should the permitted sites set out in the District's Housing Trajectory not come forward as projected, especially when regard is given to the omission of windfall in the first 2 years and therefore the omission of sites delivering less than 5 dwellings. Further to this it should be noted that when the draft Local Plan is published in Autumn 2019 it will set out additional proposed allocations (meaning a number of the sites currently showing as 'Not Currently Developable' will turn to 'Developable' within years 6-10 or 11+).
- 4.86 The Council will monitor the delivery of sites through Chapter 3 of its annual Authority Monitoring Report (AMR). Should development not come forward at the rate which is projected, the Council will look towards its 'Developable' sites within the SHELAA and work with Parish and Neighbourhood Council's to bring these forward, along with suitable sites constrained only by local planning policy currently showing as 'Not Currently Developable', through neighbourhood planning and/or additional site allocations documents.

5.0 Conclusions

- 5.1 The SHELAA trajectory demonstrates that the Council has enough potential development sites, not only to meet its five and ten year housing requirements as identified in the Horsham District Planning Framework, but also that there is a surplus of sites, which will enable the Council to progress those sites considered

most sustainable. The SHELAA can be used by Parish Councils and Neighbourhood Forums as a starting point for work on their Neighbourhood Development Plans and also Horsham District Council in the review of the HDPF.

- 5.2 The District's housing requirement equates to 800 dwellings per year as presented in the newly adopted Horsham District Planning Framework. A five year supply of housing incorporating an additional 5% buffer as required through the NPPF equates to 4,263 units for years 1-5, with an additional 4,000 units for years 6-10 and 11-15 thereafter. This equates to a requirement for 8,263 dwellings over the next 10 years.
- 5.3 The Council identifies 4,539 dwellings on sites which are considered 'deliverable' within years 1-5. These sites are allocated or already have planning permission, are available for development within years 1-5 and have few constraints restricting delivery. This increases to 4,689 dwellings when a windfall allowance is included.
- 5.4 The assessment also identifies 3,616 units which the Council considers developable within years 6-10. These sites are considered developable to varying degrees having regard to a range of considerations such as viability, multiple ownership and infrastructure capacity. Further work would need to be undertaken to ensure that these sites become 'deliverable'; however it is anticipated there is sufficient potential to consider these sites developable within a ten year supply. This increases to 3,866 dwellings when a windfall allowance is included.
- 5.5 Taking the above into consideration, in addition to the Council's acknowledged allowance for windfall development, the potential supply of identified sites considered 'deliverable' (1-5 years) or 'developable' (6-10 years) would yield up to 8,555 units which is more than sufficient to meet a ten year supply of housing sites as required through the NPPF.

6.0 Monitoring & Next Steps

- 6.1 Horsham District Council will endeavour to undertake and publish a full review of the SHELAA annually. This will feed into the ongoing monitoring of the HDPF,

subsequent planning documents such as Neighbourhood Development Plans and the review of the HDPF.

- 6.2 The SHELAA is a live document therefore if any member of the public, developer, landowner/agent or Parish Council or other organisation has any further information they would like to submit in relation to a site or if they have an additional site they would like to put forward for inclusion in the SHELAA, the relevant information should be sent to the Strategic Planning Team¹⁹ at:

Email: Strategic.planning@horsham.gov.uk

Mail: Strategic Planning Team

Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

- 6.3 This information will then be considered and (where appropriate) included within the next review of the SHELAA. The SHELAA Planning Practice Guidance requires the assessment of a Local Planning Authority's 5 year housing land supply to be kept up to date (at least annually). Following the publication of this SHELAA Report, the SHELAA process will be repeated regularly. The next review of the SHELAA is scheduled for publication in Autumn 2019. The cut-off date for the publication of this report will be made available on the Strategic Planning web pages:

<http://www.horsham.gov.uk/planningpolicy/planning-policy/housing-land-availability>

¹⁹ Please use the [submission form](#) provided on Horsham District Council's website.

Appendix 1: Assessment of Strategic Housing Sites (Broad Locations of search) within the Northern West Sussex Housing Market area – The Broad Locations that informed the Horsham District Planning Framework

The Localism Act 2011 and the National Planning Policy Framework 2012 (NPPF) places a Duty to Co-operate on local planning authorities to address strategic planning issues relevant to their areas in the preparation of their Local Plans. The duty requires that councils consider joint approaches to plan making where necessary.

When preparing the HDPF, it was known through previous discussions with neighbouring authorities that the Objectively Assessed Housing Need was unable to be met across the northern West Sussex Housing Market Area. The SHELAA was, therefore, considered as an important tool for identifying potential housing sites which could be called upon to address some of this need on a sub-regional basis.

Horsham has a history of positive joint working with its neighbours to address identified housing need and prepared a Joint Area Action Plan with Crawley Borough Council (CBC) in 2009. Discussions were therefore held with Crawley Borough Council and Mid Sussex District Council (MSDC) to identify significant broad locations which could be considered for sub-regional growth. Conversations were restricted to CBC and MSDC as these authorities form part of the same Housing Market Area as Horsham District Council (HDC).

For a site to be considered as a potential broad housing location within the Housing Market Area, a threshold of 500 units was agreed to ensure it was of a significant size to meet demands across the entire housing market area. A joint SHELAA assessment was then undertaken for each site and agreed between the three authorities. The results of the SHELAA assessments for the broad locations across the northern West Sussex Housing Market Area are summarised in Table A1.

Please note that all the information presented in Table A1 was accurate and up to date at the time of publication. The SHELAA however is a live document and

continually subject to review meaning this information, including site boundaries, may be updated in subsequent revisions of the SHELAA.

Table A1: Assessment of Potential Strategic Housing Sites (Broad Locations) across the Northern West Sussex Housing Market Area

Sites in the Horsham District				
SHELAA Ref	Site Name	Site Address	Site Units Total	Broad Locations Capacity
Formerly SA119 now split to form two sites SA119 and SA413	West of Southwater	Wider Strategic Site	0	<p>The landowner has expressed an interest in developing the site (SA119) indicating it is 'available'. This site was proposed as part of a strategic allocation during the preparation of the Horsham District Planning Framework 2015 (HDPF). An element of this land was allocated for housing under Policy SD10 in the HDPF and is considered separately under SA413 (<i>which reflects the land assessed under SA413 has planning permission for 594 dwellings</i>).</p> <p>This strategic scale site lies within the countryside adjoining the western built up area boundary of Southwater. A number of Listed Buildings, rights of way and Ancient Woodland lie within the site, the majority of which lies in a Bat Sustenance Zone. The site also has nature conservation and archaeology interest. Unless allocated for development through the review of the HDPF or via a made Neighbourhood Plan, it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF. It is therefore assessed as 'Not Currently Developable'.</p>
SA101	Land West of Ifield	Ifield, Crawley -Strategic Site Option	0	<p>This is a strategic scale site located in Horsham District, but directly adjoining the settlement of Crawley. The land has been proposed by Homes England and a consortium of other land owners meaning the site is available for development. The site has been proposed for a development of around 3,000 homes and associated infrastructure. A small proportion of this land falls within the administrative boundary of Crawley Borough Council and there is the need for cross boundary working in the consideration of this site.</p> <p>There are a number of constraints which impact the suitability and achievability of development on this site. This includes impacts on flooding, and the setting of Ifield Conservation area. The northern part of the site is within the Gatwick Airport Safeguarding area and noise contours. There are also a number of infrastructure issues which would need to be addressed, including sewerage and impacts on the existing road infrastructure.</p> <p>Unless allocated for development through the review of the Horsham District Planning Framework this site would be contrary to policies 1, 4 and 26 of the HDPF in particular. The site is therefore assessed as 'Not</p>

				Currently Developable'.
SA295	Greater Faygate	Strategic Site Option	0	<p>The availability of this site is uncertain due to a lack of an up to date expression of interest to develop from the landowner. The site surrounds the existing built form of Faygate, and would significantly expand the size of the current settlement. There is significant risk of coalescence between Horsham and Crawley, and adverse visual impact on the adjoining AONB. The site may also have an impact on the existing road network. The site is not being actively promoted by any developer, limiting availability of the site. Unless allocated for development through the review of the Horsham District Planning Framework 2015 (HDPF) it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF. The site is therefore assessed as 'Not Currently Developable'.</p>
Formerly SA294 now SA597	Land between Adversane and North Heath	Strategic Site Option	0	<p>A planning consultant on behalf of the landowners has expressed an interest in developing the site meaning it is 'available'. The site was originally identified as an area of search for a potential strategic site option in the preparation of the Horsham District Planning Framework 2015 (HDPF). This smaller site is within an Archaeological Notification Area and contains two areas of Ancient Woodland. It is mainly located in West Chiltington Parish, but the land area also falls in part within the Parishes of Billingshurst and Pulborough.</p> <p>The site is unrelated to any defined built up area boundary and any development in this location would need to take the form of a new settlement. There is limited infrastructure in this area and this would need to be addressed before any development could come forward.</p> <p>Unless allocated for development through the review of the Horsham District Planning Framework (HDPF) or via a made neighbourhood plan, it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF. The site is therefore assessed as 'Not Currently Developable'.</p>
Formerly SA118, now split and formed from SA118, SA346, SA412, SA565, SA698 and also SA637 (assessed for employ-	Land East of Billingshurst	Strategic Site Option	559	<p>(New SA118) The landowners have expressed an interest to develop the site meaning it is 'available'. This land was first identified as part of a wider strategic site option for 1,750 homes during the preparation of the Horsham District Planning Framework. Planning permission has been granted for around 500 homes (see SA412). 67 dwellings have also been permitted and completed east of Manor Close/South of Hill and Farm (SA346). The remainder of the site is now being promoted for a total of 1200 units plus B use class employment land.</p> <p>The remainder of the wider strategic site option lies within the countryside adjoining the eastern part of Billingshurst. The land adjoins an area of ancient woodland to the east, and there are a small number of listed buildings in or close to the proposed strategic location. The western boundary of the Billingshurst</p>

ment)				Conservation Area also adjoins a portion of the site. The impact of the site on the Bat Sustenance Zone would require consideration. However unless allocated for development or similar through the review of the Horsham District Planning Framework (HDPF) or via a made Neighbourhood Plan, it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF. The site is therefore assessed as 'Not Currently Developable'.
SA296	Land North of Horsham, Strategic Site	Holbrook Park and Chennells Brook- Strategic Site	2750	The site is allocated for the development of 2,500 homes and associated infrastructure in the adopted Horsham District Planning Framework (HDPF) Policies SD1 - SD9 and 15. It has planning permission for 2,750 dwellings via planning application DC/16/1677 which was permitted on 1/03/18. Taking this information into account it is considered that a small portion of development could come forward in the short term (1-5 years) with the majority being delivered in the medium to long term 6 - 10 and 11+ years.
SA341	Land West of Kilnwood Vale	Crawley Road, Near Crawley	0	<p>The land owner has expressed an interest to develop the site meaning it is 'available for development'. The site has been proposed as an extension of around 750 homes to the Kilnwood Vale strategic development which is a strategic allocation of around 2,500 homes adjoining the existing administrative boundary of Crawley (see SA289) and for which development has commenced.</p> <p>There are a number of environmental constraints including Ancient Woodland and Sites of Scientific Interest are present within the site boundary. There are also a number of infrastructure issues which would need to be addressed, including sewerage and impacts on the existing road infrastructure. Given the proximity of this site to Kilnwood Vale and the impact that development in this location could have on nearby Crawley joint working would be required to bring this site forward.</p> <p>Unless allocated for development through the review of the Horsham District Planning Framework 2015 (HDPF) or via a made Neighbourhood Plan, it is considered development would be contrary to Policies 1 to 4 and 26 with some conflict to Policy 31 of the HDPF. It is therefore assessed as 'Not Currently Developable'.</p>
SA298	Land at Chesworth Farm	Land south of Brighton Road: Strategic Site Option	0	The site was originally identified as an area of search for a strategic site during the preparation of the Horsham District Planning Framework (HDPF). It adjoins the southern settlement boundary of Horsham and is close to the existing town centre services and facilities. However, the site is an important recreational resource and has identified landscape and wildlife value to the south of the town. It is therefore not assessed as a suitable location for development. The site would need access to the A281 and infrastructure capacity is low. The costs to overcome this limit the viability of the site. The site is therefore assessed to be 'Not Currently Developable'.

SA413	Land West of Southwater	West of Southwater: Strategic Site Option	594	The site is allocated for housing in the Horsham District Planning Framework 2015 (HDPF) by Policies SD10 and 15. It has planning permission for 594 dwellings via planning application DC/14/0590 and development is underway. The site is therefore assessed to be available, suitable, achievable and deliverable years 1-5.
SA414	Mayfield Market Town New Settlement	New Market Town - Broad Location	0	<p>This site has evolved from an area initially identified as a broad location of search following the publication of the 2010 New Market Town Study, commissioned jointly by Crawley Borough Council (CBC), Mid Sussex District Council (MSDC) and Horsham District Council (HDC). The developer has previously expressed a preferred approach for a development of up to 10,000 dwellings on land in both Horsham and Mid Sussex administrative areas. However, within HDC a development of up to 6,120 dwellings together with associated infrastructure is currently being proposed for consideration. The site falls in Woodmancote, Shermanbury and Henfield parish areas.</p> <p>The site is in multiple land ownership, which may affect deliverability. Landowner interest in developing the whole site would therefore need to be carefully tested. There would also be a need for cross boundary working, with MSDC and with West Sussex County Council.</p> <p>The site has a range of environmental and infrastructure constraints including an area of flood risk which would require mitigation. If developed, the site would need to create its own social, economic, transport and utilities infrastructure. Improved connectivity to the trunk road and rail network (which is some distance away) would also need to be carefully considered. Any major development would also need to take account of the retail viability of existing settlements such as Henfield. Unless allocated for development through the review of the Horsham District Planning Framework (HDPF) it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF and potentially other policies relating to the constraints of the site. It is therefore assessed as 'Not Currently Developable'.</p>
SA642	Land to the west of the A29 at Billingshurst	Broad Location	0	The landowner has expressed an interest in developing the site meaning it is 'available'. This is a strategic scale site in the countryside west of and in effect adjoining, albeit divided by the A29, the built up area boundary of Billingshurst which is defined as a Small Town by Policy 3 of the Horsham District Planning Framework 2015 (HDPF), having a good range of services and facilities. The separation of this site by the A29 from the main settlement of Billingshurst impacts upon access to the town and its facilities. It is predominantly rural in nature and the central and southern parts of the site are within Flood Zones 2 & 3. Unless allocated for development through the review of the HDPF or via a made Neighbourhood Plan, it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF. The site is therefore assessed as 'Not Currently Developable'.

From the assessment of sites in the Horsham District, it can be seen that only three sites, at Land North of Horsham, West of Southwater and East of Billingshurst are considered suitable, available and achievable for development at the present time. These sites have been allocated through the Horsham District Planning Framework (HDPF) to address HDC's identified housing need.

The remaining sites had a number of constraints which would prevent them from being delivered in the current plan period. It was therefore agreed between all authorities in the Northern West Sussex Housing Market Area that there were no further options for growth in the Horsham District at the time of the HDPF preparation. Further information on the agreed approach to housing delivery within the Northern West Sussex Housing Market Area is set out in the Duty to Co-Operate Statement for the Horsham District Planning Framework.

Sites in the Crawley Borough

Please note that the majority of sites in the Crawley Borough are smaller than the 500 units site threshold identified in the Methodology, however these will be combined to form larger strategic locations as set out in Table A2.

Sites in the Crawley Borough				
SHELAA Ref	Site Name	Site Address	Site Units Total	Broad Locations Capacity
At Crawley Ref: Option A North East Sector				
286	Forge Wood (North East Sector) Neighbourhood, Pound Hill, Crawley	Strategic Site Option: At Crawley Ref Option A North East Sector	1,900	Development commenced in June 2014. The council will continue to work closely with the development consortium to ensure the delivery of the site in line with the phasing plan, given the importance of the site to the council's Housing Land Supply.
52	North East Sector – Residual Land of Core Strategy Allocation Adjacent to Steers Lane Pound Hill North, Crawley	Residual Part of Strategic Site Option: At Crawley Ref Option A North East Sector	75	The site was previously allocated in the Core Strategy as residual land for the North East Sector planning permission. Subsequently, the principle of residential development in this location is accepted particularly when Forge Wood is (mainly) built. The site is included in the Crawley Borough Local Plan as a broad location for housing development in the medium to long term on the basis that development and infrastructure requirements would need to integrate with, and be tied to the phasing of construction of the Forge Wood Neighbourhood site, without compromising its delivery. It should be noted that a number of Tree Preservation Orders (TPO) are on site and this will need to be accounted for when designing a housing scheme. Noise levels in

				this location would need to be adequately mitigated in line with Policy ENV11. The current land owner is pro-actively promoting the residual land at the current time. The council will have to enter dialogue with the landowners and the Forge Wood Consortium in order to bring a detailed site forward.
373	North East Sector – Residual Land adjacent to Heathy Farm, Crawley	Residual Part of Strategic Site Option: At Crawley	75	The site was previously allocated in the Core Strategy as residual land for the North East Sector planning permission. Subsequently, the principle of residential development in this location is accepted, particularly when the North East Sector allocation is (mainly) built. The site is included in the Crawley Borough Local Plan as a broad location for housing development in the medium to long term on the basis that development and infrastructure requirements would need to integrate with, and be tied to the phasing of construction on the Forge Wood Neighbourhood site, without compromising its delivery. Noise levels in this location would need to be adequately mitigated in line with Policy ENV11. The current land owner is pro-actively promoting the residual land at the current time. The council will have to enter dialogue with the landowners and the Forge Wood Consortium in order to bring a detailed site forward.
259	Land East of Balcombe Road, Pound Hill North, Crawley	Land to North of Strategic Site Option:	0	Part of the site is identified as Ancient Woodland (Allen's Wood). The majority of the site is also located within the land safeguarded for a second wide-spaced runway at Gatwick. This effectively prevents development (such as housing) which would be incompatible with the expansion of the airport to accommodate an additional runway. The site is also significantly affected by airport noise and the central and northern section of the site is located between the 66 and 69dB(A) and 69 and 72 dB(A) predicted air noise contours for a twin runway (Gatwick Master Plan, July 2012). The Local Plan Noise Annex identifies that residential development above 66dB(A) is not considered acceptable due to the unacceptable effect on people's health. These factors and in particular, airport safeguarding, prevent the majority of the site being considered as suitable for housing.
285	North East Sector, Gas Holder site, Pound Hill North, Crawley	Residual Part of Strategic Site Option: At Crawley	0	The site was within the North East Sector allocation for 2700 units within the adopted Core Strategy (2008), but it has significant flood risks and there is a high likelihood of contaminated land, which means that the site is unsuitable for housing development.
At Crawley Ref: Option F/G West of Ifield				
0	Land at Meldon, Rusper Road	Small Part of Strategic Site Option: At Crawley Ref Option F/G West of Ifield	0	The site is not considered to be suitable for development at this stage, principally on the basis of flooding. The other issue which needs to be addressed relates to highway access constraints and the design of an appropriate scheme outside the Built Up Area Boundary, adjacent a listed building and adjacent a Local Green Space. Ongoing dialogue will be undertaken with the agent, the Environment Agency and West Sussex County Council to ascertain

				the extent to which the site may be constrained by flooding and highway issues.
51	Land West of Ifield (Ifield Brook Meadows)	Small Part of Strategic Site Option: At Crawley Ref Option F/G West of Ifield	0	The site is designated as a Site of Special Nature Conservation Importance (SNCI) and has significant amenity and recreational value, which is represented by its Local Green Space designation (Policy ENV3). The built-up area boundary (BUAB) review for the Local Plan proposes that this area remains outside the BUAB in the rural fringe. The site plays a prominent role in the setting of the Ifield Conservation Area. Furthermore, a significant portion of the site is designated by the Environment Agency as being Flood Risk Zones 2 and 3 and this will prevent large scale development of the majority of the site.
At Crawley Ref: Option H Langley Green				
287	Land at Poles Lane	Part of Strategic Site Option: At Crawley Ref Option H Langley Green	0	The site falls within the Gatwick Airport Safeguarding, and is safeguarded from development that would be incompatible with the potential expansion of the airport to accommodate an additional wide-spaced runway (if required). However, if Gatwick Airport Safeguarding is removed, the site could become a logical extension to the Manor Royal as an employment site. Owing to noise constraints, it is not thought that site would be compatible for housing development.
299	Land adjacent to Langley Walk and Burlands (incorporating Willoughby House)	Part of Strategic Site Option: At Crawley Ref Option H Langley Green	0	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on the transport network, neighbour amenity, street scene, trees, character of the area, and parking can be adequately addressed. The area is identified on the Crawley Local Plan Key Diagram as "Area of Search – Future Housing" and "Area of Search for Future Employment".
300	Cherry Lane Playing Fields	Part of Strategic Site Option: At Crawley Ref Option H Langley Green	0	The site contains a number of formal outdoor sports pitches and older/children's play space, as recognised in the council's Playing Pitch study (2013) and Open Space, Sport and Recreation study (2013). The Cherry Lane site was identified as a 'hub' site and considered of good quality. Policy ENV4 of the Local Plan, with regards to playing pitches, protects the site from being developed, since this site is clearly identified as being essential to the borough in terms of formal sports provision. In addition, road access to the site is likely to be problematic and the entire site is designated in the Local Plan as structural landscaping (Policy CH7).
At Crawley Ref: Option I North Manor Royal				
	North Manor Royal	Strategic Site Option: At Crawley Option I North Manor Royal	0	The area falls within the Gatwick Airport Safeguarding, and is safeguarded from development that would be incompatible with the potential expansion of the airport to accommodate an additional wide-spaced runway (if required). However, if Gatwick Airport Safeguarding is removed, the site could become a logical extension to the Manor Royal as an employment site. Owing to noise constraints, it is not thought that site would be

				compatible for housing development.
At Crawley Ref: Option K Tilgate Forest				
47	Land East Brighton Road	Part of Strategic Site Option: At Crawley Ref Option K Tilgate Forest	0	The site remains outside the Built-Up Area Boundary in the Tilgate Forest Rural Fringe. The site would have potential integration issues with the existing town and surrounding neighbourhoods. The site is mostly wooded, and certain areas are designated as Ancient Woodland, which significantly limits the site's capacity. Issues of accessibility to the site and broader highway capacity would need to be resolved in addition to a detailed understanding of the site's capacity in light of the Ancient Woodland designations and noise levels from the motorway. The remaining land which is not identified as Ancient Woodland is heavily treed and this further constrains the site's capacity.
Crawley Town Centre				
Crawley Town Centre: Key Opportunity Site – total anticipated capacity 499 net dwellings				
402	County Buildings, Northgate, Crawley	Crawley Town Centre: Key Opportunity Site	50	Residential development at this site is considered to be suitable and achievable. The capacity identified above is a minimum figure based upon a three/four storey residential scheme.
69	Telford Place, Three Bridges, Crawley	Crawley Town Centre Key Opportunity Site	99	A residential scheme is considered to be suitable and achievable, and the site is considered to be capable of development in the short term given improving market conditions.
297	Crawley Station and Car Parks	Crawley Town Centre: Key Opportunity Site	300	Residential development at this site is considered to be suitable and achievable. An outline planning application for redevelopment of this site including 308 dwellings (CR/2016/0294/OUT) is currently awaiting determination.
403	Land North of The Boulevard	Crawley Town Centre: Key Opportunity Site	185	Woodhall Duckham House on this site is currently being converted from office to residential use under a prior approval (CR/2015/0192/PA3) for change of use to 185 dwellings. Proposals to redevelop the Town Hall site and provide around 200 dwellings are being explored by the council.
Crawley Town Centre: Broad Locations – total anticipated capacity 156 net dwellings				
54	Fire Station, Ifield Avenue	Crawley Town Centre	48	The site is considered suitable for residential development, but site availability in the short term remains uncertain at present.
58	Central Sussex College Site	Crawley Town Centre	90	The site offers a town centre opportunity for a flatted development in a landmark location. A planning application for 90 dwellings on part of this site (CR/2016/0089/FUL) is currently awaiting determination.
311	Parkside Car Park	Crawley Town Centre	10	The site is considered to be suitable and achievable, though it is uncertain as to whether the site is currently available.
371	1-7 Pegler Way	Crawley Town Centre	20	The site is considered to be suitable and achievable in view of its town centre location, though land assembly issues suggest that this site is only likely to come forward for development in the medium to long term.

372	Brittingham House, Orchard Street	Crawley Town Centre	24	The site is considered to be suitable and achievable in view of its town centre location, though land assembly issues suggest that this site is only likely to come forward for development in the medium to long term.
310	The Old Vicarage, Church Walk	Crawley Town Centre:	18	The site is considered to be suitable and achievable, though land assembly issues suggest that this site is likely to come forward for development in the medium term.

From the assessment of sites located in the Crawley Borough, some ten sites were considered to be suitable, available and achievable for housing delivery. These sites included a strategic allocation for a new Neighbourhood of 1,900 units at Forge Wood and strategic development in the Town Centre both of which were progressed by CBC in their Local Plan.

Sites in the Mid Sussex District

A number of sites were considered by Mid Sussex District Council in the SHELAA documentation that was published to support the preparation of their District Plan that was adopted in 2018. Information that was published in 2015 by Horsham District Council to support the Local Plan review process is set out in the table below to show the range of sites which were considered as broad locations as part of that process. It should be noted that Mid Sussex are now preparing a Site Allocations document. The information that is now on their website is therefore a more recent iteration than the broad location information that was used to support the preparation of their District Plan. Site numbers and names of the sites may therefore not necessarily tally with those in the table below which only sets out the sites that informed the process in 2015:

SHELAA Ref	Site Name	Site Units Total	Broad Locations Capacity
233	Land to the South of Burgess Hill (South of Folders Lane)	1,000	No recent promotion (for whole site)
740	Land to the West of Burgess Hill	1,500	Promoted at District Plan publication stage but with no details
18	Land to East/South of Crawley (Crabbet Park)	2,300	There is a reasonable prospect that site could be developed within the Plan period.
678	New Market Town (Sayers Common area)	10,000 (5,000 in Mid Sussex)	Promoted at District Plan publication stage but given the outcome of the Horsham examination, delivery within the first five years is unlikely
240	Land North of Cuckfield	500	No recent promotion

	Bypass (Cuckfield)		
17	Land adj. Great Harwood Farm (East Grinstead)	400 (formerly considered for 600)	There is a reasonable prospect that the site could be developed within the Plan period.
498	Land north east of Lindfield (Lindfield)	300 (formerly considered for 1,200)	There is a reasonable prospect that the site could be developed within the Plan period.
483	Land east of Northlands Brook and south of Scamps Hill (Lindfield)	500	Planning permission refused for up to 200 units, currently at appeal.
503	Haywards Heath Golf Course (Haywards Heath)	1100 (formerly considered for 500)	There is a reasonable prospect that the site could be developed within the Plan period.
515	Eastlands, Lewes Road (Scaynes Hill)	630	No recent promotion
666	Hardriding Farm, Brighton Road (Pease Pottage)	500	Planning application for 600 units submitted (also allocated in emerging District Plan)
603	Land South of Pease Pottage (Pease Pottage)	660	There is a reasonable prospect that the site could be developed within the Plan period.
243	Land at Lower Tilgate (Pease Pottage)	1800 (formerly considered for 1,750)	There is a reasonable prospect that the site could be developed within the Plan period.
736	Broad Location North and East of Ansty	2,000	Promoted at District Plan publication stage but with no details

It is important to note that since 2015, the Mid Sussex District Plan (2014-2031) has been adopted (28 March 2018) and a number of strategic sites yielding 500+ dwellings have been allocated including DP9: Strategic allocation to the north and north-west of Burgess Hill (approximately 3,500 dwellings); DP10: Strategic allocation to the east of Pease Pottage (approximately 600 dwellings – site 666); DP11: Strategic allocation to the north of Clayton Mills, Hassocks (approximately 500 dwellings). In addition to these DP8: Strategic allocation to the east of Burgess Hill at Kings Way also allocates up to 480 dwellings. A Site Allocations DPD is being prepared. This will allocate around 2,500 dwellings, which is the residual amount required to deliver the District Plan requirement up to 2031.

Appendix 2: Assessment of Windfall Potential

The National Planning Policy Framework (NPPF) defines a windfall as: “Sites not specifically identified in the Development Plan” (Annex 2: Glossary, NPPF)

The NPPF (paragraph 70) states that “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.” It should be noted that prior to the publication of the revised NPPF in July 2018 the national guidance explicitly excluded residential gardens from any allowance.

The Council undertook an analysis of the historic delivery of windfall sites as shown below as background evidence to the HDPF. This analysis shows that on average, the authority has delivered 50 windfall units per annum since 2007/08. In accordance with the former NPPF (2012), this figure does not include sites which constitute back garden development. It should be noted that now this restriction is no longer included in the revised NPPF (2018) it is likely the annual windfall figure of 50 would be greater.

The Council will annually monitor the supply of windfalls and should development come forward at a quicker rate than that estimated, the figures may be re-examined in future reviews of the SHELAA.

Method for analysing historic delivery of windfall sites for the HDPF

A windfall site is a site which is not specifically allocated or identified for development, therefore in order to ascertain the historic delivery of windfall sites, it was necessary to analyse past housing permissions and identify the unexpected development which had come forward since the Core Strategy was adopted in 2007.

The threshold for sites allocated through the Horsham District Planning Framework or identified through the SHELAA was six²⁰ units or above, therefore a starting point for this analysis was to look at minor applications granted permission since the Core Strategy was adopted in 2007. This list captured all residential units for 10 units or below granted planning permission within each respective monitoring year.

²⁰ Please note, unlike previous iterations, the 2018 SHELAA applied a threshold of 5 dwellings or more.

The analysis of minor permissions from 1 April 2007 to 31 March 2014 made use of seven years of reliable and comprehensive data on permissions which could be broken down and analysed. The data included the full planning application description together with the planning application reference allowing duplicate applications to be filtered out where necessary – for example for the Approval of Reserved Matters on an earlier application.

Taking the minor applications data as a baseline, further analysis was undertaken to discount those applications which were on residential gardens as these were not to be counted towards windfall delivery. Any site which was found to be on garden land was therefore removed from the assessment.

Sites located in the South Downs National Park (SDNP) were also removed from the assessment as the park is no longer within Horsham District Council Planning Area. While the South Downs Area was not given National Park status until 2011, it was decided to remove these sites as a matter of consistency moving forward, so as not to artificially inflate the results for the earlier years of analysis.

Results

The results of the detailed Windfall Analysis as shown in Figure 1, demonstrate that on average around 94 small unallocated sites have been delivered annually in the Horsham District since 2007. This is a net figure and does not include replacement dwellings.

Of these 94 permissions, an average of 43 dwellings per year have been on garden land, meaning the district has consistently delivered on average around 52 dwellings per year from windfall development over the past seven years.

FIGURE 1: Housing permissions on windfall sites 2007 - 2013

Sites filtered by monitoring year (31st March 2007 to 1st April 2013)

PERMISSIONS GRANTED	Small sites (total permitted)	sites net	No. of Applications on Garden Land	No. of Small sites Minus those on GL
2007/08	130		75	55
2008/09	130		83	47
2009/10	81		31	50
2010/11	76		22	60
2011/12	73		21	52
2012/13	79		41	42
2013/14	90		30	60

Average = 52

The District opted to include a windfall delivery figure of 750 units over the lifetime of the plan. This equates to 50 units per year over the 20 year plan period, minus 200 units which would have already been delivered in years 2011 to 2014 and a further 50 units for flexibility.

Local Circumstances and Justification for including a Windfall Allowance

The detailed evidence above demonstrates that the Council has a sufficient and justifiable need to include a windfall allowance in its housing supply moving forward. This evidence is based on the fact that in the past, windfall development has formed a significant part of the overall number of dwellings which have been delivered. With a presumption in favour of sustainable development (when in accordance with the HDPF), there is no reason to believe it would not continue to form a notable part of the overall supply of new housing.

While the former NPPF was not supportive of the inclusion of garden land as windfall development, the Council believes there is clear evidence and policy support that supply from this source will continue. However, to ensure consistency with the former NPPF, the Council opted to remove all garden land from the windfall analysis figure for the purposes of setting a figure for the HDPF.

Future Approach

It is considered that the above analysis provides the necessary justification for the inclusion of a windfall allowance. This will be assessed through on-going monitoring in relation to housing delivery as part of the Council's Annual Authority Monitoring Report.

APPENDIX 3:

Summary of Site Assessments & Site Maps

Please note that electronic copies of this document
provide this data in separate Parish Packs

Important Information about the SHELAA

In order to avoid any unnecessary confusion, the Council would like to make the following points clear in relation to the Strategic Housing and Economic Land Availability Assessment (SHELAA) and any related findings;

- The SHELAA only identifies opportunities for housing development on sites, which are considered to be deliverable, developable and available. *It does not allocate sites to be developed.* The allocation of sites for future housing development will be identified through Local Plans or Neighbourhood Development Plans.
- The identification of potential sites within the SHELAA does not imply that planning permission would be granted if an application were to be submitted. The SHELAA is a high level assessment. All planning applications will continue to be considered against the appropriate policies within the adopted/made Development Plan, having regard to any other material considerations.
- The inclusion of potential sites within the SHELAA does not preclude them from being considered for other uses.
- The boundaries of sites are based on the information available at the time of the assessment. The SHELAA does not limit an extension or contraction of these boundaries for the purpose of a planning application.
- The exclusion of sites from the SHELAA (e.g. because they fall below the required threshold of 5 units for residential development and 0.25ha for economic land) does not preclude the possibility of a planning application being submitted on that site and later granted. Suitable sites (particularly small sites) for residential development that have not been identified in the SHELAA will continue to come forward through the usual planning process, including neighbourhood planning.
- The classification of sites in terms of when they are likely to come forward for delivery (i.e. 1-5 years, 6-10 years and 11+ years) is based on an assessment of the site at the time the SHELAA was undertaken. Circumstances or assumptions may change over time, which may mean that sites could come forward sooner or later than originally envisaged.

- The classification of a site is based on the classification of the developable area within that site. Therefore if part of a site is considered 'developable' – i.e. that it is likely to be delivered within years 6-10 or 11+, then the whole of the site would be coloured yellow. That is not to say that the whole site would be developed, only that there is potential for some form of development to be delivered within the wider site boundary within the given timescale. Once an application has been permitted for a site, the site area is either re-drawn according to the application boundary or the number of units permitted is removed from the overall site total and the remainder of the site is assessed for its development potential. If no other portion of the site remains developable or deliverable, the remainder of the site is excluded or returned to 'Not Currently Developable' depending on the characteristics of the site.
- The SHELAA is a living document which will be updated on an annual basis. All SHELAA sites will be reviewed as part of the next annual SHELAA review.
- Should any further information be submitted which would change the status of a site following the publication of this SHELAA report, it will be saved on file and used to re-assess the sites, when the SHELAA is reviewed – currently timetabled for Autumn 2019.
- The Report has a base date of 26 October 2018 (or in respect of sites covered by the SSWNP, the 22 November 2018) and the findings are a snap-shot of information held in the SHELAA database at this time. It is therefore likely that some of the information presented in this report has changed since publication. For example, sites that are identified as not having planning permission may have secured permission since the information was compiled and published. Similarly planning permission may have lapsed on other sites.
- In addition, the information that accompanies the SHELAA is based on information that was available at the time of the assessment. There may therefore be additional constraints on some sites that were not identified as part of the study. Likewise, some of the identified constraints may have been removed since the information was compiled. Applicants are therefore advised to carry out their own analysis of sites to identify any constraints or other information for the purpose of a planning application and not rely solely on the findings of the SHELAA.
- The housing capacity of a site in the study either relates to the number of dwellings granted planning permission (where applicable) or is an estimate based on an

assessment of what could be an appropriate density for the site in question. Please note that the site capacities in the study do not preclude different densities being applied on sites, subject to details.

- There is no limit to the amount of land that can be included within the SHELAA, and therefore no limit on the number of sites which can be submitted. Any sites submitted after the cut off date for this SHELAA (26 October 2018), will be included in the next annual review of the SHELAA.
- The HDPF and any decisions made are informed by a number of studies and background documents. The SHELAA is only one of these documents and any decisions regarding planning policy must have regard to all the relevant studies and comments received during consultation.

If you are viewing an electronic version of this document please see the Parish Packs for the summary of site assessments and maps.