



Horsham  
District  
Council

# **Horsham District Council**

## **Regulation 19**

### **Site Assessment Report**

**December 2023**

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**1.0**

**Introduction**

## 1.0 Introduction

- 1.1 In order to ensure that the future housing needs of the District can be met, it is recognised that additional allocations for housing and employment land will be required. The Council is required to assess all available land to understand whether it is suitable, available and achievable for development over the next 15 years. This document sets out the results of the detailed site assessment work which has been undertaken in order to inform the preparation of the Local Plan.
- 1.2 This document is published as a background document to the Regulation 19 Horsham District Local Plan (HDLP) which has identified land which is considered by this Council to have potential for housing and employment allocation. This document sets out detail on the site assessment process that was undertaken, together with a summary of the results of that process. **The document does not form Council policy but sets out professional officer's assessments and recommendations and provides evidence supporting the Local Plan.**
- 1.3 This report consists of four sections. Section 1.0 provides an introduction to the document's purpose and structure. Section 2.0 sets out the process and methodology used in preparing the site assessments.
- 1.4 Section 3.0 sets out a series of assessment proformas for proposed housing and mixed-use sites, with a conclusion and a recommendation at the end: there is a proforma for each site assessed, and these are arranged by settlement to which the site best relates. Section 4.0 sets out the assessment proformas for proposed employment sites, using the same structure as for Section 3.0. Section 3.0 and Section 4.0 are split into subsections with housing sites assessed as having development potential ('accepted') and those assessed as not having potential ('rejected') grouped. Section 4 has proposed employment allocations and sites rejected for employment allocation also grouped together.
- 1.5 Representations are being invited on the Regulation 19 Horsham District Local Plan. Comments which are submitted during the representations period, including those which reference the outcomes set out in this report, will be considered. If 'duly made' (i.e. within the regulations that apply to this stage of plan-making) they will eventually be forwarded to an independent Planning Inspector.

# 2.0

## Site Assessment Process and Methodology

## **2.0 Site Assessment Process and Methodology**

### **Call for Sites**

- 2.1 The first stage in understanding the land available for development was a 'call for sites' which was held in 2017, and again in the spring and summer of 2018. Landowners and developers and other interested parties were invited to submit land to this Council to consider for development as part of the Local Plan Review process. We also undertook our own research reviewing planning applications and emerging neighbourhood plans in order to identify possible development locations which may not be submitted to the Council directly.
- 2.2 As a result of the call for sites and our own research, some 500 sites were put forward to the Council for consideration for a range of different types of development. The vast majority of these (around 450) were promoted for residential development, either in whole or in part as a mixed use scheme. These sites range in scale from those promoting development of five homes up to large scale developments of several thousand homes.

### **The Strategic Housing and Employment Land Availability Assessment (SHELAA)**

- 2.3 The Council has undertaken a Strategic Housing and Land Availability Assessment (known as a SHELAA). This is a high-level assessment which gives an indication of the sites that may have potential for development. The SHELAA documentation is split into two sections. The employment assessment was published in 2018, and the housing section in 2019. The document is available to view on the Council's website: <https://www.horsham.gov.uk/planning/planning-policy>. Both these SHELAA assessments were undertaken taking account of the Council's current Local Plan – the Horsham District Planning Framework (HDPPF). Officers have used this information to initially inform the assessments presented in this report, and in the interim period has further updated this information and reflected updates in this report.

### **Horsham District Local Plan Review – Site Assessment Criteria**

- 2.4 It is a requirement that Local Plan Policies must be reviewed at least every five years. Given the step change in housing delivery which the government are seeking, it was considered that the sites in the SHELAA required reviewing against NPPF criteria in further detail and without applying existing local policy constraints.
- 2.5 A set of Site Assessment Criteria were devised to ensure that each proposed development site could be assessed in more detail, on a consistent basis. A key requirement of the Site Assessment Criteria was that they took account of the suitability, availability and deliverability of the land. These criteria are set out as Appendix 1 of this report.

2.6 The Site Assessment Criteria was shared with site promoters for comment and feedback. Following the finalisation of the draft criteria an opportunity was provided for site promoters to submit information to the Council to help provide information against which proposals could be assessed. The assessment of sites has been ongoing since 2019. Further details of the site assessment process are set out in the following paragraphs.

## Shortlisting of sites

### a) Site size

- 2.7 The Site Assessment criteria have only been applied to sites capable of delivering more than 5 homes or are greater than 0.25 hectares for employment proposals. This is consistent with the thresholds set out in our SHELAA assessment. Sites falling below this threshold have been classified as "Housing Sites Below the threshold (5 dwellings)" in Appendix 2 and are not considered further as an allocation in the Local Plan, albeit such sites can still be considered through the planning application process and, if ultimately permitted, would be classed as 'windfall' development.

### b) Sites where the principle of development has been agreed

- 2.8 A number of sites listed in the SHELAA documentation now have planning permission, or the principle of development has been agreed as a result of an allocation in either the Horsham District Local Plan, Joint Area Action Plan or a Neighbourhood Plan. These sites were therefore not subject to further assessment. For completeness they are listed in Appendix 2 of this document which lists excluded sites.
- 2.9 In addition to sites which have permission or are allocated in a development plan, a number of sites have been proposed which are already located within an existing built-up area boundary. In policy terms, the general principle of development in these locations is considered acceptable. As sites which are within existing built-up areas can be considered under the existing and proposed future policy framework, these were excluded from further assessment. They are also listed in Appendix 2 as excluded sites.

### c) Site Availability

- 2.10 The majority of sites that have been proposed to the Council were identified through the Council's own research can be considered 'available' for development during the plan period. This is because these sites are being actively promoted through the call for sites, through planning applications, or to Parish Councils as part of the process of neighbourhood plan preparation.
- 2.11 There are a small number of sites that are held on the Council's SHELAA database that have not been actively promoted for a number of years. Despite attempts to make contact with the landowners during the site assessment process, the Council has not been able to obtain up-to-date information for these locations. These sites have therefore not been considered available for development. They have therefore been excluded from further assessment. They are listed Appendix 2. Should these landowners make contact with the Council as part of the Local Plan Review process, they will be reconsidered.

#### d) Site Suitability

2.12 Paragraph 8 of the National Planning Policy Framework (NPPF) sets out the definition of sustainable development in relation to the planning system. It makes clear that development should pursue economic, social and environmental objectives in mutually supportive ways and those opportunities should be taken to secure net gains in each area. Sites were therefore assessed against fourteen criteria derived from these NPPF/PPG and other guidance criteria in order to attain an overall assessment of site suitability. It is important to note that only the NPPF had a determining influence on these criteria, and no local policy criteria were used (in other words, a 'policy-off' approach). The detailed considerations are set out in Appendix 1 but the key criteria are set out in the table overleaf:

1) Environmental Considerations	Landscape
	Biodiversity
	Archaeology / Cultural Heritage
	Environmental Quality (Soil / Air / Water)
	Flooding / Drainage
	Climate / renewables / energy efficiency
2) Social Considerations	Housing
	Education
	Health
	Leisure / Recreation / Community Facilities
	Transport
	Other infrastructure
3) Economic Considerations	Economy
	Retail

2.13 The NPPF states that certain assets, including Areas of Outstanding Natural Beauty (recently renamed National Landscapes), Sites of Special Scientific Interest and irreplaceable habitats such as ancient woodland should be protected from development. Any sites (promoted for residential, employment or mixed use) and located fully within such areas were therefore considered not to be suitable and were excluded from further assessment. These are listed in Appendix 2.

2.14 The NPPF is also clear that planning policies that lead to isolated developments in the countryside should be avoided. The Council follows the established view that development on land which does not adjoin existing built-up area boundaries and is not of a sufficient scale to bring forward new services and facilities on site, would lead to isolated rural development that perpetuates unsustainable lifestyle patterns. A number of sites proposed to the Council for development in these locations were therefore excluded from further assessment and are again listed in Appendix 2. It should be noted that employment sites in rural areas have also been excluded from further assessment where they did not relate well to existing built form or the main road network.

### Assessment of site suitability

2.15 Where sites were considered to be available, and met the initial screening process above, they were subject to a further detailed assessment and site visits were undertaken. Overall, the suitability of sites were assessed collectively against environmental, economic and social criteria were made using a rating scheme as follows:

	Very Positive Impacts
	Favourable Impacts
	Neutral Impact
	Unfavourable Impacts (where there is potential for mitigation)
	Very Negative Impacts (impacts unlikely / unable to be mitigated)
	Impact unknown / no information

- 2.16 At the end of the site suitability assessment for each site, the various strands of the assessment were drawn together to determine whether a site had potential to be developed in a manner which could bring forward sustainable development, leading to an overall score. Even where a site performed well in two out of the three strands of sustainable development, (e.g. housing or the economy) a very poor score in a third area (e.g. an infrastructure delivery ‘showstopper’ or severe environmental impact which cannot be mitigated), could lead to a result where a site was not assessed as suitable for development. The RAG rating is meant to be a guide and there are many variables which can lead to a site being allocated or not for development. The conclusion to each assessment proforma provides the recommendation for each site which balances the positive and negative impacts as well as the prospect for mitigation of negative impacts.

### **Deliverability and Viability**

- 2.17 Where sites were assessed to be available and suitable for development, the deliverability of the development was also considered. It will be necessary to bring forward housing development across the whole Plan period (i.e. to 2040), and sites were not excluded simply because they were not available for development in the short to medium term. Factors such as the complexity of land ownership and the extent of site assembly in determining when land could be brought forward were taken into account.
- 2.18 The assessment process also took into account the scale and type of the site. Previous experience in Horsham District has demonstrated that larger scale strategic sites can take a number of years to allocate, gain planning permission and then build out, whereas smaller scale greenfield sites can often come forward much more quickly as they are generally less complex to develop. Brownfield land can also be more challenging to deliver if there are existing uses on site that have to be relocated, or where past uses have led to issues such as ground contamination, which needs to be remediated.
- 2.19 The viability of sites is also important – in the current financial climate, on sites where there are not considered to be significant complex issues such as ground pollution or contamination, sites are likely to be financially viable. Assessments have equally taken account of where there are site specific issues that is likely to prevent a site being developed. The Local Plan Viability Study considers at a strategic level the viability of a range of typical non-strategic sites, and assesses the likely viability of strategic sites that have been considered through preparation of the Local Plan.

### **Development Quality**

- 2.20 Where sites were judged to be suitable, available, deliverable and viable, the selection of sites for inclusion in the Horsham District Local Plan has also taken into account the ability of the development to bring forward a scheme that is of high quality. It is recognised that what different schemes are able to deliver in terms of infrastructure or other community benefits will vary – a site for 10 homes will, by its nature, have a different ‘offer’ to that of a very large-scale strategic site of several hundred homes.

- 2.21 However, the Council has sought to understand the high-level vision that is being proposed for each site and the potential for sites to bring forward aspects such as high quality design, the key components that a site will bring forward and the benefits that may be provided to both new and existing residents.

### **Sustainability Appraisal**

- 2.22 In addition to this site assessment process, a separate sustainability appraisal process has been undertaken to consider the relative sustainability of sites not screened out, in accordance with legislative requirements. This process has considered both individual and cumulative sustainability impacts. The appraisal considers how each site performs against 17 sustainability objectives, each of which relates to a social, economic or environmental aim.