



**Upper Beeding Neighbourhood Plan Examination.**

**Statement by Horsham District Council in response to the  
Independent Examiner Request for Points of Clarification.**

**Question for the District Council**

**10 September 2019**

## **1.0 Introduction**

- 1.1 This statement is in response to the Examiner request for clarification in relation to land east of Pound Lane and the status of planning application DC/18/2325 and DC/18/2318. The second part of this statement addresses if Upper Beeding Neighbourhood Plan and the proposed delivery of 109 dwellings would be in general conformity with the policies in the Horsham District Planning Framework (HDPF).

## **2.0 Context**

- 1.2 Upper Beeding Parish has been designated as a Neighbourhood Plan area since September 2013. The Steering group leading the preparation of the neighbourhood plan has undertaken extensive engagement on a range of evidence gathering activities and consultation events.
- 1.3 The Parish published a Pre-Submission Plan for consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This consultation was held between 25 June 2018 to 13 August 2018. Comments were considered and the Pre-Submission Plan was amended accordingly. A revised "Submission Plan" was then formally submitted to Horsham District Council on the 24 January 2019. The Council, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, held a consultation on the Upper Beeding Submission draft Neighbourhood Plan. Representations were invited between 15 February 2019 and 5 April 2019. A further Regulation 16 six-week consultation was held from 7 June 2019 to 19 July 2019 to ensure procedural compliance with Neighbourhood Planning Regulations.

## **3.0 Land east of Pound Lane**

- 3.1 The Parish Council is seeking a comprehensive development proposal at Land east of Pound Lane. The site comprises of three parcels of land under three different landownerships. Policy 3 of the emerging Upper Beeding Neighbourhood Plan consolidates the principle that the three parcels of land should not be developed in a piecemeal fashion and should come forward in a comprehensive manner and sympathetic to the locality.

- 3.2 On 21 Jan 2019, Horsham District Council and the developer (Rydon Homes Ltd) signed a Planning Performance Agreement (PPA) in relation to the two planning applications at Pound Lane, Upper Beeding (DC/18/2325 & DC/18/2138 refer). The purpose of this PPA was to enable timely discussions to take place to ensure a high quality development came forward in accordance with the Upper Beeding Neighbourhood Plan and for Rydon Homes to fulfil their commercial obligations in accordance with their option agreement with the landowner which required a planning application to be submitted and held in abeyance in accordance with the terms of the PPA.
- 3.2 The PPA allowed for a short delay to the determination timeframe for these applications to take into account of progress on the Upper Beeding Neighbourhood Plan, to ensure ultimately that any proposal was modified to accord with the emerging policies in the Plan should it continue to seek to allocate the site for development. Should there have been any significant delays in the progress of the Plan, or the site not ultimately be allocated, there was a break clause that allowed us to reconsider matters on or around 1 May 2019, including modifications of the development applied to reflect the emerging Neighbourhood Plan. As a consequence, the intent was that both applications would not have been determined until post Neighbourhood Plan referendum. In the end, both applications were withdrawn earlier in the Neighbourhood Plan process than originally anticipated (26 March 2019), so making the PPA redundant.
- 3.3 Horsham District Council can confirm the withdrawal of Planning applications DC/18/2325 and DC/18/2318 submitted by Rydon Homes which has since relinquished its controlling interest in the site. It is understood that another developer (Reside Homes) has entered into a formal commercial agreement with one of the landowners and has agreed to work with the other stakeholders to deliver a viable scheme. No further applications have been submitted.

#### **4.0 Upper Beeding Housing Requirement**

- 4.1 Upper Beeding Neighbourhood Plan is promoting the delivery of 109 dwellings to be delivered within the plan period up to 2031 and made best endeavours to be in general conformity with Horsham District Planning Framework (HDPF) which was adopted in November 2015. This document is the overarching planning framework for Horsham district. The HDPF sets out the planning strategy for the years up to 2031 to deliver

the social, economic and environmental needs of the district, outside of the South Downs National Park, in collaboration with other local planning authorities under the duty to cooperate process. This document sets out the number of homes which need to be built in the District in the period to 2031, together with strategic locations for development, employment policies and policies to ensure that development protects the environment and landscape within the district.

4.2 As part of this process, the Council adopted a number of policies that related to housing provision, most notably policy 15 of the HDPF (Strategic Policy: Housing Provision) that sets out the housing requirement of the district between 2011 and 2031 and how this provision will be made. The total housing requirement for the Horsham district from 2011-2031 is 16,000 homes, which equates to an average of 800 homes per annum. This figure is to be achieved through a number of means as stated below:

1. Housing completions for the period 2011 -2016;
2. Homes that are already permitted or agreed for release;
3. Strategic Sites:
  - a. At least 2,500 homes at Land North of Horsham;
  - b. Around 600 homes at Land West of Southwater;
  - c. Around 150 homes at Land South of Billingshurst.
4. **The provision of at least 1,500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning.**
5. 750 windfall units

4.3 As highlighted above, Horsham District Council does not specify a housing target for each neighbourhood plan parish, such as Upper Beeding, but instead makes a broader allocation (1,500 dwellings) for all those parishes/neighbourhood forums.

4.4 Nevertheless, it is anticipated that the Upper Beeding Neighbourhood Plan would contribute to this housing growth target through suitable site allocations within their Neighbourhood Plan. Both the quantum and appropriateness of this contribution should be based on a number of factors, including the latest evidence base documents underpinning both the parish and district council areas on housing needs, the

constraints to the particular settlement and its position within the Development Hierarchy, as discussed below.

- 4.5 Policy 3 (Strategic Policy: Development Hierarchy) of the HDPF denotes the functions and roles of all settlements within the district and categorises settlements into types. There are four distinct groupings of classified settlements within this development hierarchy and a further category for unclassified settlements that are considered to be the least sustainable in terms of accommodating new development. Upper Beeding alongside Bramber is considered to be within the 'small towns and larger villages' category (the second most sustainable category) that is defined, within Policy 3 of the HDPF, as follows:

*'These are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements/each other to meet some of their requirements.'*

There are seven other settlements that are considered to be within this category, which includes Billingshurst, Bramber and Upper Beeding, Broadbridge Heath, Henfield, Pulborough and Codmore Hill, Southwater and Steyning. Only Horsham town is considered to be more sustainable than the settlements listed above and it is therefore anticipated that where such parishes are engaged in the Neighbourhood Planning process, they should make a positive and proportionate contribution to the total 1,500 figure identified in policy 15 of the HDPF.

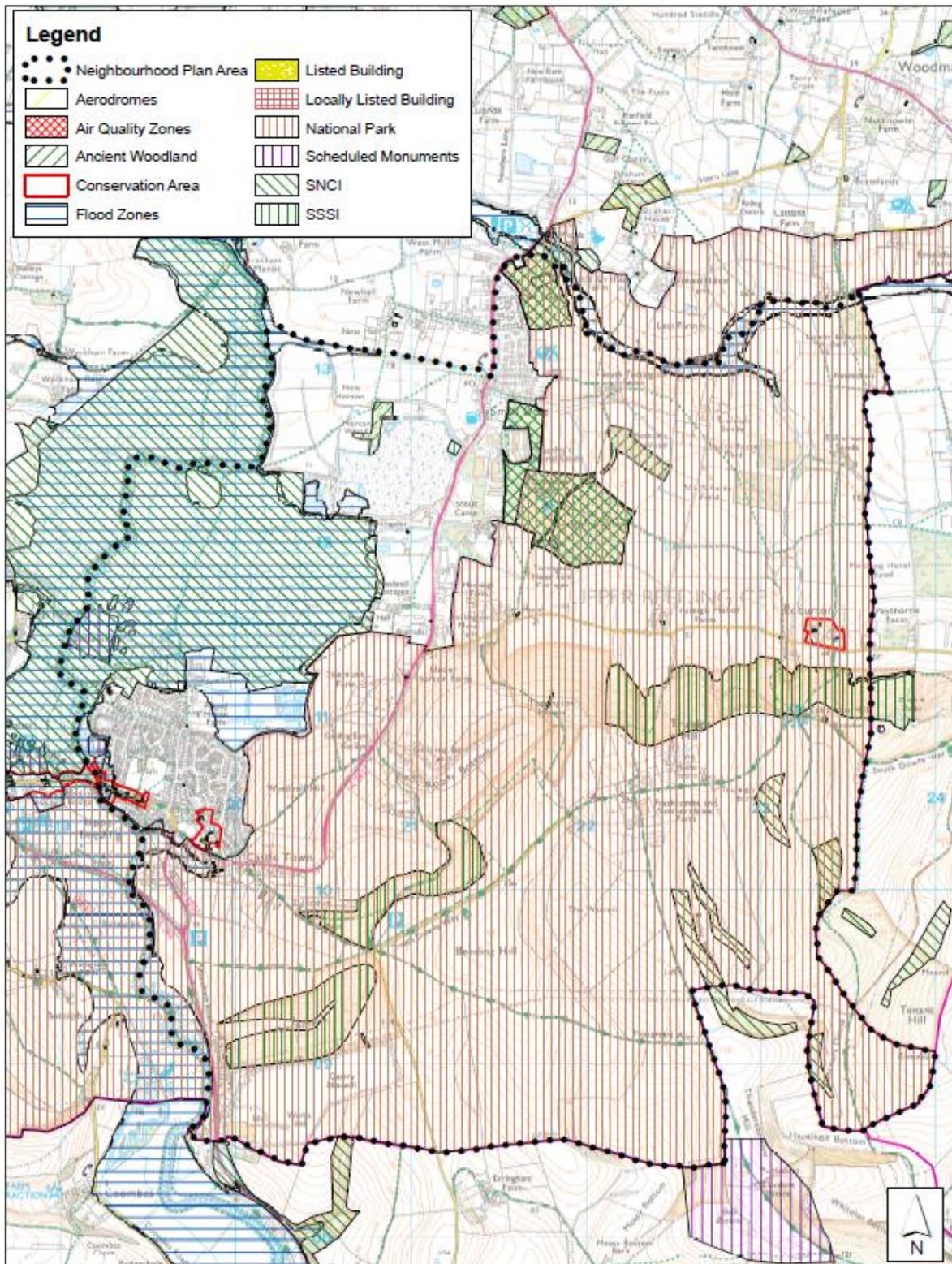
- 4.6 As discussed above, it is considered that housing provision allocated in the Upper Beeding Neighbourhood Plan would support the strategic housing provision policies of the HDPF, be proportionate to its position within the development hierarchy and would align with both the District's and Parishes' evidence base on housing need. In strategic planning policy terms, the Inspectors Report into the HDPF Examination in October 2015 at paragraph 47 noted that the number of homes being proposed within Neighbourhood Plans was inevitably uncertain but 'that the number of 1500 over the whole district seems realistic' and it is considered that this Neighbourhood Plan would fulfil the strategic policies of the HDPF in this respect.

- 4.7 To aid steering group members, HDC officers have advise all neighbourhood planners seeking to determine a housing requirement figure to undertake a formal technical assessment of housing needs. Local groups were encouraged to contact Locality the Government's Neighbourhood Planning delivery body to access the technical support packages which is open to local groups subject to eligibility. One of the technical support packages available to local groups is the Housing Needs Assessment undertaken by AECOM and is a robust means to generate a viable housing requirement figure for a neighbourhood plan area and supported by clearly set out robust methodology, advocated by Locality and by the Planning Practice Guidance<sup>1</sup>.
- 4.8 It should also be noted that the site assessment work completed in support of the Upper Beeding Neighbourhood Plan has been thorough and that the Parishes have endeavoured to accommodate housing growth in their areas but, due to the availability of viable housing sites and constraints surrounding the settlement, the objectively assessed housing needs cannot be fully realised. It is acknowledged by the District Council that this is a strategic issue which if the requirement of 'at least 1500 homes' cannot be met through neighbourhood planning, it will be addressed as part of the HDPF review which started in earnest in 2018 with the Issues and Option document on Employment and Development Boundaries out to consultation last year. The Council will be publishing its Preferred Options Development Plan Document for consultation in early 2020. The constraints surrounding Upper Beeding village is highlighted in Map 1 (page 7) and demonstrates the limited availability of opportunities open to the parish.
- 4.9 Overall Horsham District Council acknowledges Upper Beeding Parish and the volunteers in the steering group have made best endeavours to accommodate the housing requirement figure as stipulated in the AECOM Housing Needs Assessment and accompanied by a robust supporting evidence base to justify this position. It is the consideration of officers the plan has been positively prepared and meets the Basic Conditions.

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

**Map 1. Map of Constraints in Upper Beeding Parish**



**Horsham District Council**  
 Parkside, Chart Way, Horsham  
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Upper Beeding - Constraints			
Reference No :	Date : 02/09/2019	Scale : 1:20,000 (at A3)	
Drawing No :	Drawn :	Checked :	Revisions :