



Strategic Housing and Economic Land Availability Assessment (SHELAA)

Economic Land Report 2018

Horsham District Council

April 2018

Glossary

AONB	Area of Outstanding Natural Beauty
BUAB	Built-up Area Boundary
DPD	Development Plan Document
HDPF	Horsham District Planning Framework
KEA	Key Employment Area
LDS	Local Development Scheme
LNR	Local Nature Reserve
NPPF	National Planning Policy Framework
NDP	Neighbourhood Development Plan
PDL	Previously Developed Land
RSL	Registered Social Landlord
SAC	Special Area of Conservation
SHELAA	Strategic Housing & Economic Land Availability Assessment
SFRA	Strategic Flood Risk Assessment
SDNP	South Downs National Park
SNCI	Sites of Nature Conservation Importance
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order

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Executive Summary

Introduction

The Strategic Housing & Economic Land Availability Assessment (SHELAA) is an evidence base document used to support the development of planning policy documents (including the adopted Horsham District Planning Framework (HDPF) and its review¹) and to help inform emerging Neighbourhood Development Plans. The aim of the SHELAA is to provide an assessment of potential housing and economic land to enable the Council to identify a sufficient supply of deliverable sites to provide five years' worth of housing/employment land and identify suitable deliverable sites or broad locations for 6-10 years and 11-15 years where possible, as required by paragraph 47 of the National Planning Policy Framework (NPPF) in the case of housing.

To date, Horsham District Council has published four Housing Land Availability Assessments. The August 2016 SHELAA Report formed the first element of the SHELAA (2016), focussing primarily on housing availability. It was reported at the time that the Economic Land Assessment would follow later in the year. This SHELAA (Economic Land) Report forms the second element of that assessment.

The SHELAA (formerly known as the SHLAA) changed its name 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 their assessment of land availability. 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 a regular basis.

Background

Paragraph 159 of the National Planning Policy Framework (NPPF) requires local authorities to prepare a Strategic Housing & Economic Land Availability Assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land within their area. As part of this process, local planning authorities must assess all potential opportunities for development to help identify which sites or locations are most suitable or deliverable for a particular use.

¹ Please see the Local Development Scheme (LDS), January 2017 – December 2019 <https://www.horsham.gov.uk/planningpolicy/planning-policy/planning-timetable>

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

Paragraph 161 of the NPPF requires local planning authorities to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.

The Strategic Housing and Economic Land Availability Assessment (SHELAA) is the process of gathering together information to create a portfolio of sites which may be considered for future planning purposes. The assessment 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 when this Plan is reviewed. The SHELAA will also assist local parishes and Neighbourhood Forums as a first step in the identification of sites to be considered for inclusion in their emerging Neighbourhood Development Plans.

Findings

The total amount of potential **employment** land identified in this iteration of the SHELAA is given in Table 1 below.

Table 1 SHELAA Employment Sites

Outcome of Assessment	Number of Sites	Area (ha)
Deliverable 1-5 years (green)	5	20.82
Developable 6-10 years (yellow)	10	24.44
Developable 11+ years (yellow)	8	37.65
TOTAL	23	82.91
Not Currently Developable (red)	17	

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 for consideration for economic development following the cut-off date for this report (30 September 2017) will be considered as part of the 2018 SHELAA review together with any additional information available on each of the sites considered in this report.

Sites submitted to the Council for consideration in housing land assessment, following the cut-off date of the previous Housing report (20 May 2016) will be considered as part of the 2018 SHELAA review, together with any additional information available on each of the sites considered in this report.

Important Information about the SHELAA

In order to avoid any unnecessary confusion, the Council would like to make the following disclaimer in relation to the Strategic Housing and Economic Land Availability Assessment (SHELAA) and any other reports relating to its findings;

- The SHELAA only identifies opportunities for housing or economic 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 or economic development uses will be identified through the review of the HDPF or Neighbourhood Development Plans.
- The identification of potential housing or economic 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 Document (DPD), having regard to any other material considerations.
- The inclusion of potential housing or economic 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.
- The SHELAA includes housing sites suitable to accommodate six units or more. For employment uses, the SHELAA would only include sites of 0.25 hectares (or 500 square metres of floor space) and above. The exclusion of sites from the SHELAA which fall below these thresholds does not preclude the possibility of a planning application being submitted and later granted. Suitable sites for residential or economic development that have not been identified in the SHELAA will continue to come forward through the usual planning process; this would include 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 assessment 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 a Development Plan Document (DPD), 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, as this demonstrates deliverability. Sites with planning permission will be considered deliverable until that planning permission lapses, unless there is clear evidence that a scheme will not be implemented within five years; for example the development is no longer viable.
- The housing capacity of a site in the study either relates to the number of dwellings granted in a planning permission, or is an estimate based on an assessment of what could be an appropriate density for the site in question. In terms of economic development capacity, the hectares provided by land agent/land owner have been recorded, and where possible, the potential floorspace. The site capacities in the study do not preclude different densities being supported at an 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 planning permission. In the case of broad locations, the capacity of the wider site area site would be reduced by the number of units/employment floorspace 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 would be 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. Land 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 a living document which will be updated on a regular basis. All SHELAA sites will be reviewed as part of the next SHELAA review, unless the local planning authority has been told that there has been a change in circumstances.
- The 2016 Housing Land Assessment (August, 2016) had a base date of 20 May 2016, and the 2017 Economic Land Assessment (December 2017) has a base date of 30 September 2017. 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 reassess the sites, when the SHELAA is next reviewed.
- Any sites submitted after this cut-off date will be included in the next review of the SHELAA.

1. Introduction

- 1.1 The NPPF requires local planning authorities to use their evidence base to assess the existing and future supply of land available for housing and economic development and its sufficiency and suitability to meet identified needs³. As part of this process, local planning authorities must consider where housing or economic development uses would be best located and assess all potential opportunities for development locations. The Strategic Housing and Economic Land Availability Assessment, hereon in referred to as the 'SHELAA', is the process of gathering together this information to create a portfolio of housing and economic sites, which may be chosen for future planning purposes. This assessment is the second part of the 2016 SHELAA assessment and covers economic land. Part 1 of the Assessment, covering housing was published in August 2016 and is available on the Council's website. The SHELAA assessment has assisted Horsham District Council in the identification of potential locations for housing or economic development, through the adopted Horsham District Planning Framework (HDPF) and the HDPF Review. It is also used to assist Parishes in the identification of sites to be considered in their emerging Neighbourhood Development Plans. This document will continue to form part of the Council's evidence base for the review of the HDPF.
- 1.2 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, hereon in 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 a regular basis.
- 1.3 The aim of the SHELAA is to assist local authorities in the identification of suitable sites for housing or economic development to enable them to maintain an adequate supply of housing and economic 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 or economic development would be best located.

³ See paragraph 161 of the NPPF.

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

1.4 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 given the high level approach. This will be considered as part of the planning application process in full consultation with interested parties, including local communities.

2. Background

- 2.1 The Horsham District Planning Framework, herein referred to as ‘the HDPF’ covers the Plan period from 2011 to 2031. The HDPF was formally adopted by the Council in November 2015 following publication of a ‘Final Report into the Examination’ by the Planning Inspector appointed by the Government to examine the plan. In his report the Inspector found the plan to be sound, but increased the requirement from 650 to 800 dwellings per annum (dpa). 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.
- 2.2 In terms of employment land, the HDPF contained no target for employment growth, which was considered by the Inspector to be consistent with the NPPF, which only requires local planning authorities to plan positively for expected employment needs in a general sense. The Northern West Sussex Economic Growth Assessment (EGA) Supplementary Report for Horsham, published in April 2015⁵, did confirm that with a minimum target of 750 dwellings per annum, there would be a gross land requirement of 38.1 Ha of employment floorspace until 2031. It should be noted, as discussed above, that the housing requirement did rise to 800 dpa during the examination hearings and as a result, the gross land requirement for employment would have been raised also.
- 2.3 The SHELAA Planning Practice Guidance, last updated 27 March 2015⁶:’ states that as a minimum a SHELAA 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).
- 2.4 This approach ensures that all land is assessed together as part of a plan preparation process to identify which sites or broad locations are the most suitable and deliverable for their proposed use.

⁵ Northern West Sussex Economic Growth Assessment: Supplementary Report for Horsham, April 2015:

https://www.horsham.gov.uk/_data/assets/pdf_file/0005/21749/EGA-Supplementary-Report.pdf

⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment>

2.5 Sites included in the SHELAA are subdivided into three categories and assessed according to their *suitability*, *availability* and *achievability* as set out in Table 2. Further detail on how this assessment is made is set out in Section 4.

Table 2: Classification of SHELAA sites

<p>Deliverable – To be considered '<u>deliverable</u>', sites should be <i>available now</i>, offer a <i>suitable</i> location for development now, and be <i>achievable</i> within the next five years (i.e. that the development of the site is economically viable). Sites with planning permission should be considered '<u>deliverable</u>' until permission expires, unless there is clear evidence that schemes will not be implemented within five years.⁷ 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 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.⁸ These sites are coloured YELLOW on the maps</p>
<p>Not currently developable – If it is not known when a site could be made available or viably developed, it is considered '<u>Not Currently Developable</u>' and is coloured RED on the maps.</p>

South Downs National Park (SDNP)

2.6 A number of the sites within Horsham district originally submitted to the SHELAA, are now located within the South Downs National Park (SDNP). The South Downs National Park Authority, hereafter referred to as the 'SDNPA', produced its first SHLAA Report on the 21 January 2015 to feed into the preparation of the emerging South Downs National Park Local Plan. This was updated in December 2016. Any sites previously submitted to the SHELAA which fell within the National Park boundary have been transferred to the SDNPA for consideration where the landowner has expressed an intention to do so. Where it was not possible to contact the landowner or agent representing the site, the sites have been excluded from the HDC SHELAA assessment and details were not transferred to the SDNPA.

⁷ See National Planning Policy Framework (NPPF) footnote 11

⁸ See National Planning Policy Framework (NPPF) footnote 12

3. Progress to Date

- 3.1 As set out in paragraph 1.1 of this report, the National Planning Policy Framework (NPPF) requires local planning authorities to maintain an adequate supply of sites in their area. Horsham District Council therefore regular reviews its SHELAA assessment in order to support new Development Plan Documents (DPD). The SHELAA (formerly the SHLAA) was used to inform the preparation of the Horsham District Planning Framework (HDPF).

- 3.2 This SHELAA report forms Part 2 of the August 2016 SHELAA Assessment and contains the first full review of all potential economic sites submitted prior to the cut-off date of 30 September 2017. As part of this, it includes an assessment of land available for economic development as per the requirements of paragraph 161 of the NPPF.

- 3.3 The SHELAA Planning Practice Guidance sets out a standard methodology for undertaking a housing and economic land availability assessment and is updated by the Department for Communities and Local Government (DCLG) when required.

- 3.4 Table 3 below demonstrates the stages of the assessment that have been undertaken for housing/economic development sites to date:

Table 3: SHELAA Process as set out in the SHELAA Planning Practice Guidance (27 March 2015)

Stage 1	<p>Site and broad location identification</p> <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	<p>Site/broad location assessment</p> <ul style="list-style-type: none"> • Estimate development potential • Consider whether a site is suitable, available or achievable • Consider constraints and how they may be overcome
Stage 3	<p>Windfall assessment</p> <ul style="list-style-type: none"> • Determine housing potential of windfall sites (where justified); this is solely for the housing assessment under paragraph 48 of the NPPF (housing only)
Stage 4	<p>Assessment Review</p> <ul style="list-style-type: none"> • Assessment of development needs for housing and economic development uses • Review assessment and prepare draft trajectory
Stage 5	<p>Final Evidence Base</p> <ul style="list-style-type: none"> • Monitoring • Deliverable Housing/Economic Sites (5 year supply); and • Developable Housing/Economic Sites (6-10 and 11+ year supply)

3.5 Stage 5, or the final evidence base document, can then be used to inform the District's Development Plan Documents (DPD), such as the review of the HDPF, and emerging Neighbourhood Development Plans (NDPs) in the district.

4 Methodology

- 4.1 The following sections provide a summary of the methodology adopted by Horsham District Council in preparing the SHELAA. The methodology complies with the National Planning Policy Framework (March 2012) and the SHELAA Planning Practice Guidance (last updated March 2015).

Stage 1: Identification of Sites

Timetable

- 4.2 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 and employment over the plan period.
- 4.3 The SHELAA is a 'live' document and the Council continues to invite submissions for consideration in future assessments on an on-going basis. In order to undertake each assessment, it is necessary for each SHELAA report to have a base date to enable an accurate analysis of available sites to be undertaken. The base date (or 'cut off date') for this economic land report was the **30 September 2017**. This means that all employment 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.

Adjacent Authorities and Partnership Working

- 4.4 An officer working group comprising Horsham District Council, Crawley Borough Council and Mid Sussex District Council was established to develop a joint methodology for assessing SHELAA sites and to also consider the potential for broad locations. Regular meetings were held and the outcome of these meetings was to ensure a consistent approach to the SHELAA agreed by all three authorities. The common approach to the SHELAA enables the three assessments to be easily compared and viewed in a wider regional context. The parameters agreed by the working group are set out in detail below.

Sites falling below the SHELAA Threshold

- 4.5 Any site considered to have an estimated yield falling below the agreed threshold of 6 dwellings and 0.25ha (or 500m² of floor space) for economic development, has been excluded from the assessment. In terms of economic development, this threshold is consistent with SHELAA Planning Practice Guidance.

Land Designations

- 4.6 Members of the officer working group agreed that sites falling exclusively within the following land designations should be excluded from the SHELAA. These designations are set out in Table 4.

Table 4: Areas of land to be excluded from the SHELAA:

<ul style="list-style-type: none">• <i>Sites of Special Scientific Interest</i>• <i>Special Protection Areas</i>• <i>Scheduled Ancient Monuments</i>• <i>Historic Parks and Gardens</i>• <i>RAMSAR sites</i>
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- 4.7 These excluded sites represent areas that are formally protected for 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%). It was therefore 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 5 provides the area figures for the excluded designations.

Table 5: Excluded designations (size)

Designation	Total Area (km²)	Percentage of District Area⁹
Site of Special Scientific Interest (SSSI)	14.61	2.75
Special Protection Area (SPA) ¹⁰	5.30	1.0
Scheduled Ancient Monument (SAM)	1.55	0.29
Historic Park and Garden	21.38	4.03
RAMSAR site ¹¹	5.30	1.0
TOTAL	42.84	7.07

South Downs National Park

- 4.8 From the 1st of April 2013, the SDNPA began directly receiving all of the 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 have been excluded from the HDC SHELAA.

Other Designations

- 4.9 Other designations that were considered for exclusion were flood risk areas, Sites of Nature Conservation Importance (SNCIs) 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 the design of the development; therefore sites containing small areas of these designations have been considered within this assessment. That said, these designations have been noted as potential constraints, 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 have been excluded from the SHELAA as they were not considered suitable for development.

⁹ Total Area of HDC is 530.93km²

¹⁰ 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.

¹¹ 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.

Remote Sites

- 4.10 Sites severely separated from the edge of villages or towns defined in policy 3 (Strategic Policy: Development Hierarchy) of the HDPF have also been assessed as having limited potential for development due to their lack of proximity to existing services and facilities, particularly in the case of residential development, meaning they represent an unsustainable form of development in a countryside location that would not be in accordance with paragraph 55 of the NPPF or the overarching settlement strategy of the HDPF. Rather than exclude these sites from the assessment, they will be considered as Not Currently Developable.

Identification of Sites

- 4.11 Sites within the SHELAA have been identified through a wide variety of sources as identified in Table 6.

Table 6: Sources of sites with potential for housing and economic development

Economic sites identified by the Council/Parish Councils
<ul style="list-style-type: none"> • Allocated land that is no longer required for that particular use; • Existing housing allocations and site development briefs (CP4, CP9, SSAL); • Existing 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 planning permission, it has still been included as it may be possible to overcome those reason(s) for refusal at a later stage. For example, an application may have been refused planning permission previously on the grounds of density, meaning an application for fewer buildings/units on the same site could be feasible • 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 16 stage.
Submitted Sites
<ul style="list-style-type: none"> • Sites submitted to the Council by individuals, landowners, agents or parish councils/neighbourhood forums. • Four 'Call for Sites' have been undertaken between January 2015 and May 2016 to identify additional sites for development. This process was widened to include land for economic development in the 2015 SHELAA. • Targeted consultation was undertaken with the Parishes and Neighbourhood Forums 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 (further details are provided in Chapter 6)
<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

- 4.12 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 residential units was applied to the search process as per the parameters agreed with the Northern West Sussex HMP. See Table 7 below.

Table 7: 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 (2014)• Sites submitted by stakeholders via the SHELAA consultation process• Economic Land Review, 2012• Horsham Town Brownfield Site Capacity Study, 2014
Since then further documents have been used to identify sites including the:
<ul style="list-style-type: none">• 2014 Economic Growth Assessment;• 2014 Horsham Town Brownfield Site Capacity Study; and• Emerging Neighbourhood Development Plans

Neighbourhood Development Plans

- 4.13 Sites from the emerging Neighbourhood Development Plans (NDP's) have been included within the SHELAA assessment if the emerging plan has been submitted to the District Council, and consultation has been undertaken under regulation 16 of the Neighbourhood Planning (General) Regulations as this provides a certain degree of confidence that the sites included will be taken forward. 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.

- 4.14 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 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 'deliverable'. Where an application has yet to be submitted or the NDP is yet to be made, the site remains yellow until deliverability can be demonstrated.
- 4.15 In addition, the potential capacity of the neighbourhood plan site remains subject to the judgment of Horsham District Council until the Neighbourhood Plan has been made. At this point the capacity agreed in the 'Made Plan' is then used, but would be subject to change if a different capacity was used for an approved planning application.

Greenfield / Brownfield Land

- 4.16 The identification of sites for inclusion within the SHELAA has been extensive and includes both greenfield and brownfield land which could be improved, intensified or changed. Where a site has particular development constraints, the constraints have been clearly documented together with a description of how this constraint could be overcome if appropriate.
- 4.17 The definition of Previously Developed Land (PDL) that was used as part of this process is derived from Annex 2: Glossary of the National Planning Policy Framework (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 structure or fixed surface structure have blended into the landscape in the process of time.'

4.18 Whilst policies in the newly 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/employment floorspace the Council need to provide. The SHELAA therefore provides a number of potential greenfield sites and brownfield sites which could be considered for future planning purposes.

Submitted Sites

4.19 Submitted sites include those submitted to the council by an external body such as a landowner, land 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.

4.20 A number of 'Call-for-Sites' exercises have been undertaken, where third parties were asked to submit sites they would like to see included in the assessment. The official call for sites ended on the 20 May 2016 and included economic development sites.

4.21 The Call for Sites process involves targeted consultation with both Parish Councils and Neighbourhood Forums. During these consultation periods each Parish is given an information pack containing details of the existing SHELAA sites within their boundaries, together with information on how they could submit additional details on existing sites and alternative sites that they may be aware of, in addition to those already within the database. This method of consultation has been seen to be successful with a further 30 sites identified by the parishes during March 2014, 50 during June 2014 and additional 100 during the course of 2015. The additional sites have been used to inform the basis of many emerging neighbourhood development plans.

4.22 In addition to the parish consultations, stakeholders who had submitted sites previously to the SHELAA were contacted in 2014 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.

- 4.23 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 website¹². The Site Assessment pro-forma is used by the Council to record the specific details of each site, including the constraints and opportunities.
- 4.24 All of the sites submitted to the Council for inclusion within the SHELAA have received desktop assessments by Planning Officers and in most cases full site surveys (including visits) have been undertaken. The site surveys are proportionate to the detail required for a robust SHELAA level appraisal. Table 8 summarises the information collected for each site.

¹² Please see the attached link: <https://www.horsham.gov.uk/planningpolicy/planning-policy/housing-land-availability>

Table 8: Information to be collected and stored for each site.

Site Characteristics E E	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, built-up area boundaries
	Infrastructure constraints, e.g. impact on highways, proximity to public transport
Development Progress	Ground works complete/buildings commenced / site built out
	Total number of residential units/employment floorspace proposed/permitted
Suitability & Deliverability	Assessment of whether the site is suitable for housing or employment use, including where applicable as part of a mixed-use development. An assessment of land preparation costs An assessment of viability and deliverability A summary of land ownership / control of site
	Likely timescale for the commencement of development. Identification of barriers to development and how they can be overcome.

Stage 2: Assessment of Economic Land

- 4.25 In the November 2015 SHELAA Report the breadth of sites included in the assessment was expanded to include sites suitable for economic development (as per paragraph 161 of the NPPF). This included a review of the District's annual Commercial and Industrial Land Assessment (CILLA) data provided by West Sussex County Council (WSSCC) to obtain an understanding of the economic sites currently 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 and/or uses intensified.
- 4.26 This report is a full assessment of the potential economic land availability in the district and is the second element of the Housing SHELAA release (August, 2016). This includes a full assessment of economic sites having regard to their suitability, availability and achievability.

Assessing suitability for Economic Development

- 4.27 Factors which make a site suitable for economic development include consideration of constraints which may impact development such as:
- The development plan, emerging planning policy and national planning policy
 - 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 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 economic development

- 4.28 The SHELAA Planning Practice Guidance states 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 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 developer who has expressed an interest to develop or a landowner who has expressed an intention to sell.
- 4.29 The following issues have therefore been taken into consideration when assessing the availability of a site for economic 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
 - timescales required to bring a site forward.
- 4.30 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 deliverable in the longer term 6-10 or 11+ years, depending on the nature or complexity of the constraints on the site.
- 4.31 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 unimplemented permissions, then this has been taken into consideration when assessing deliverability.

Assessing achievability for economic development

4.32 The assessment of whether a site is achievable or not is based on a judgment about the economic viability of the site, coupled with the ability of a developer to complete the scheme within a given time period. The assessment of a sites *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;
 - 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?

4.33 For a site to be considered achievable, and therefore deliverable, there should be a 'reasonable' prospect that development will be delivered on the site at a given point in time. In essence this is a judgment about the economic viability of the site and the ability of the developer to complete and sell or lease 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.

4.34 In order to feed into this assessment work, the Council had 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.

4.35 Each site in the SHELAA had been assessed against the criteria above to determine whether it is *suitable, available and/or achievable*. The information was then used to determine whether the site should be classified as ‘Deliverable’, ‘Developable’ or ‘Not Currently Developable’ for economic development. A summary of each site assessment is available in Appendix 3, together with a map delineating the boundary for each site.

Overcoming constraints

4.36 Where constraints have been identified, the assessment has included 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

4.37 Once the initial stages of the assessment have been undertaken and an assessment of deliverability and developability have been made, the economic development potential of all sites is collated to produce an indicative trajectory, setting out how much economic development land 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 presented in this report categorises the availability of potential sites into five year blocks:

- 1-5 years (April 2018 – March 2023) - Green;
- 6-10 years (April 2024 – March 2028) - Yellow; and
- 11+ years (Beyond 2029) -Yellow.

4.38 Sites which are unlikely to come forward within the plan period of the HDPF (i.e. to 2031), have been classified as ‘not currently developable’ and have not been included in the trajectory work.

4.39 As has already been stated, it is emphasised that the inclusion of a site within the SHELAA assessment does not imply that that 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

4.40 The assessment identified 5 sites that have the potential to deliver 20.82 hectares of economic land between years 1-5 (2018-2022). These sites are classified as 'Deliverable' (green) and are listed in Table 9.

Table 9: Economic Sites which are considered deliverable 1-5 years

Site No.	SHELAA Ref	Site Name	Parish	Hectares 1-5 Years
1	SA194	Henfield Business Park	Henfield	3.1
2	SA296	Land North of Horsham	North Horsham	4.6
3	SA831	Brinsbury	Pulborough	9.17
4	SA401	Nowhurst	Slinfold Parish	3.2
5	SA471	Units 1-15 Star Road Trading Estate Partridge Green	West Grinstead	0.75
	Total years 1-5			20.82 hectares

4.41 The assessment also identified 10 sites that have the potential to deliver 24.44 hectares of economic land between years 6-10 (2023-2027). These sites are classified as 'Developable' (yellow) and are listed in Table 10.

Table 10: Sites considered developable 6-10 years

Site No.	SHELAA Ref	Site Name	Parish	Hectares 6-10 years
1	SA819	Rosier Commercial Centre	Billingshurst	1.78
2	SA836	Foundry Retail Park, Foundry Lane, Horsham	Horsham Forest	0.37
3	SA191	Broadlands Business Campus Langhurstwood Road, Horsham	North Horsham	1.7
4	SA363	Graylands Estate Langhurstwood Road Horsham	North Horsham	1.2
5	SA390	Novartis Pharmaceuticals Site	North Horsham	7.5
6	SA635	Land at Toat Café and Lorry Park	Pulborough	2.68
7	SA102	Land North of Lower Broadbridge Farm	Slinfold	4.26
8	SA833	Land North and South of Maydwell Avenue	Slinfold	2.63
9	SA063	South of Star Road Partridge Green	West Grinstead	1.49
10	SA645	Land South of Buck Barn Services	Shipley	0.83
TOTAL 6-10 Years				24.44 hectares

4.42 Finally the assessment identified 8 sites that have the potential to deliver further 37.65 hectares in the following 11+ years (2028 onwards). These sites are classed as 'Developable' (yellow) 11+ years. The developable 11+ sites are listed in Table 11.

Table 11: Sites considered developable 11+ years

Site No.	SHELAA Ref	Site Name	Parish	11+ years Ha
1	SA637	Land north of Hallam Farm Billingshurst	Billingshurst	8.2
2	SA668	Land north west of Hilland Roundabout	Billingshurst	7.1
3	SA035	Land to the rear of Hollands Lane, Henfield	Henfield	0.8
4	SA570	Land Rear of Hilliers Garden Centre Brighton Road Horsham	Horsham Forest	3.73
5	SA172	Broomers Hill Park, Broomers Hill Lane, Pulborough	Pulborough	3
6	SA644	Land North of Buck Barn Services Worthing Road West Grinstead	Shipley	0.83
7	SA386	Land South of Lower Broadbridge Farm Billingshurst Road Broadbridge Heath	Slinfold	4.6
8	SA626	Land West of Hop Oast Land North of A24 and East of Tower Hill	Southwater	5.6
TOTAL 11+ Years				37.65

4.43 The assessment identified 17 sites which were assessed as not currently developable at the present time. The sites are listed below in Table 12:

Table 12: Sites considered not currently developable

Site No.	SHELAA Ref	Site Name	Parish
1.	SA225	Land West of Billingshurst	Billingshurst
2	SA606	Land at Wooddale Lane	Billingshurst
3	SA623	Land at Andrews Hill, Stane Street	Billingshurst
4	SA848	Southgrounds, Shoreham Road Henfield(Site K NP)	Henfield
5	SA613	Land at Slaughterford Farm (Sumner's Pond)	Itchingfield
6	SA622	Land at Wellcross, Five Oaks Road Slinfold	Itchingfield
7	SA001	Warnham and Wealden Brickworks	North Horsham
8	SA830	Land North of Broomers Hill Park	Pulborough
9	SA652	The Granary, Rusper Road Rusper	Rusper
10	SA234	Sincox Lane (Ex Arun Feeds)	Shipley
11	SA290	Brackensfield Farm, Guildford Road Broadbridge Heath	Slinfold
12	SA555	Bridge House Riding Stables Five Oaks Road Slinfold	Slinfold
13	SA620	Land at Chantry Quarry, Chantry Lane Storrington	Storrington
14	SA325	Land at Weston's Farm, Dorking Road Warnham	Warnham
15	SA842	Land north of Station Road, Warnham	Warnham
16	SA614	Rock Common, North of the Hollow	Washington
17	SA615	Rock Common, South of the Hollow	Washington

Stage 3: Windfall Sites

- 4.44 For the purposes of the SHELAA Economic Land Report windfall sites are not included.

Stage 4: Assessment Review

- 4.45 Once the sites had been assessed, the development potential of all sites was collated to produce an indicative trajectory setting out how much employment land could potentially be provided at given points in the future (1-5, 6-10 and 11+ year periods).
- 4.46 A summary of all site assessments can be found on the Horsham Council website <https://www.horsham.gov.uk/planningpolicy/planning-policy/housing-land-availability/employment-shelaa-2018> , 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).

Stage 5: Final evidence base

- 4.47 An assessment of economic site locations within the SHELAA identified 5 sites considered suitable, available and achievable for development within years 1-5 and 10 and 8 respectively being available for development in years 6-10 and 11+ thereafter.

SHELAA Economic Land Trajectory

- 4.48 Taking all of the above into consideration, the estimated total economic land capacity of SHELAA sites to be delivered throughout the remainder of the plan period; years 1-5 (2018-2022) 6-10 (2023-2027) and years 11+ (2028-2031) is 82.91 ha. This is summarised in Table 13.

Table 13: SHELAA Economic Land Trajectory

Outcome of Assessment	Number of Sites	Area (ha)
Deliverable 1-5 years (green)	5	20.82
Developable 6-10 years (yellow)	10	24.44
Developable 11+ years (yellow)	8	37.65
TOTAL	23	82.91
Not Currently Developable (red)	17	

Consideration of Associated Risks

- 4.49 Taking the above into consideration, the potential supply of identified sites considered 'deliverable' (1-5 years) or 'developable' (6-10 years) would yield up to 45.26 ha.
- 4.50 The Council will monitor the delivery of economic land sites through its annual Authority Monitoring Report (AMR).

5 Conclusions

- 5.1 The SHELAA Economic Land Report 2018 can be used by Parish Councils and Neighbourhood Forums as a starting point for work on their Neighbourhood Development Plans.
- 5.2 As discussed in paragraph 2.2, the Northern West Sussex Growth Economic Assessment (April 2015) confirmed that a target of 750 dwellings per year would require a gross land requirement of 38.1 hectares of employment floorspace between 2016 and 2031. The adopted housing target is 800 dwellings per annum. This equates a gross employment floorspace requirement, on a pro rata basis, of 40.64 hectares between 2016 and 2031. Table 9 identifies that there is a deliverable supply (years 1-5 or 2018-2023) of 20.82 hectares. Table 10 identifies that there is also a developable supply (years 6-10 or 2024-2028) of an additional 24.44 hectares of employment floorspace. If this amount were developed, it would provide a total of 45.26 hectares of employment floorspace by 2028, thus meeting the target set out in the 2015 Study.

Monitoring & Next Steps

- 5.3 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 put forward for inclusion in the SHELAA, the relevant information should be sent to the Strategic Planning Team at:

Strategic.planning@horsham.gov.uk

Mail: Strategic Planning Team

Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

5.4 This information will then be considered and (where appropriate) included within the next review of the SHELAA. The next review of the SHELAA is scheduled for summer 2018. The cut-off date for the publication of this report will be made available on the Strategic Planning web pages <https://www.horsham.gov.uk/planningpolicy/planning-policy/horsham-district-planning-framework> .