



Horsham
District
Council

Horsham District Council Regulation 18 Site Assessment Report

February 2020

Contents

1.0	Introduction	3
2.0	Site Assessment Process and Methodology	5
3.0	Housing Assessment Outcomes	10
3.01	Sites with potential for allocation for housing development	11
3.02	Sites not identified for potential allocation for housing development	141
4.0	Employment Assessment Outcomes	353
4.01	Sites proposed for employment allocation	354
4.02	Employment sites not considered suitable for allocation	377
	Appendix 1: Site Assessment Criteria	392
	Appendix 2: Excluded Sites	415

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 Horsham District Regulation 18 Consultation Document which has identified land which is considered by this Council to have potential for housing and employment allocation. This paper sets out more 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 and is for consultation only.**
- 1.3 Comments are being invited on the Horsham District Local Plan Regulation 18 Consultation Document between 17 February and 30 March 2020. Comments which are submitted during the consultation process, including those which reference the outcomes set out in this report, will be considered. If necessary, further site assessment work will be undertaken. A revised version of this document will be published to support the next stage of Local Plan Preparation, known as the Horsham District Local Plan Regulation 19 Document. It is envisaged that this document will be published in the autumn of 2020.

2.0

Site Assessment Process and Methodology

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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 SHLAA assessments were undertaken taking account of the Council's current Local Plan – the Horsham District Planning Framework (HDPF).

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 further detailed assessment without the 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 took place during the summer of 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.

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 – 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.

c) Site Availability

- 2.10 The vast majority of sites that have been proposed to the Council or 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 that opportunities should be taken to secure net gains in each area. Sites were therefore assessed against fourteen criteria derived from these NPPF criteria in order to attain an overall assessment of site suitability. 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, 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 is of the 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 assessments of the suitability of sites against individual criteria were made using a Red/ Amber/ Green rating 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.

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 2036), 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. Further work will however be required to test all sites for their viability, taking account of the level of infrastructure provision that will be needed to support development together with other policy requirements, which will emerge through this Local Plan Review. This element of work will continue as the Local Plan progresses.

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. 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

- 2.21 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. The outcome of this is set out in the Preferred Options (Regulation 18) Sustainability Appraisal.