

**Horsham Local Plan 2023-2040
Examination of the Local Plan**

**Matter 9: Sites Allocated for Development in the
Plan**

Statement on behalf of Barratt David Wilson
Southern Counties

November 2024

1. Introduction

- 1.1 This Statement is submitted on behalf of Barratt David Wilson Homes Southern Counties (hereafter referred to as 'BDWHSC') to the Horsham Local Plan Examination in response to 'Matter 9: Sites Allocated for Development in the Plan' as set out in the Inspector's Matters Issues and Questions document (ID04 – 14th October 2024).
- 1.2 This statement should be read in conjunction with the other statements submitted on behalf of BDWHSC, and their representations to consultation on the draft Local Plan.
- 1.3 BDWHSC have built a number of developments within Horsham District, recent developments include sites in Storrington and Henfield. BDWHSC has an interest in, and has actively promoted the at land at Dunstons, Shermanbury Road, Partridge Green.
- 1.4 The land promoted by BDWHSC at Dunstons, Shermanbury Road, Partridge Green was considered during the preparation stages of the Horsham Local Plan as is identified as site SA634 within the SHELAA (2018) and was included in the Council's Regulation 18 draft Local Plan as a potential site allocation (Map 15 – Partridge Green). See **Figure 1** below.

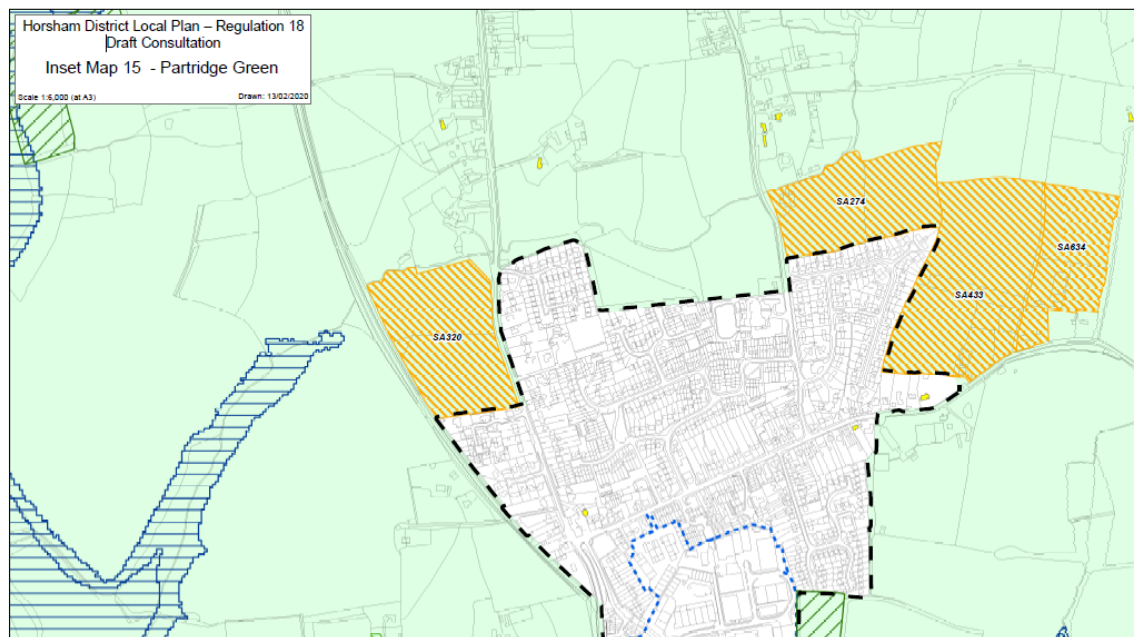


Figure 1: Horsham District Local Plan - Regulation 18 Draft Consultation (Inset Map 15)

- 1.5 Following Regulation 18 consultation, the site was assessed again and was subsequently removed from the Regulation 19 draft Local Plan as a site allocation.

2. Response to Matter 9: Sites Allocated for Development in the Plan

Issue 2 –Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

Q8. Is Strategic Policy HA12: Partridge Green Housing Allocations sound?

a) PG1 - Land North of the Rosary (West of Church Road), 4.2 hectares (80 homes)

b) PG2 - Land North of the Rise, 4.8 hectares (55 homes)

c) PG3 - Land at Dunstans Farm, 6.9 hectares (120 homes)

- 2.1 Table 1 in the Regulation 18 Local Plan identified Site SA634 – Land at Dunstans (i.e. that proposed by BDWSC) as part of a ‘Short list of sites with potential for allocation’.
- 2.2 The site at Land at Dunstans (ref. SA634) was included as part of the Regulation 18 Plan and was assessed as part of the Council’s Regulation 18 Site Assessment Report (January 2020). The site was allocated a RAG rating of ‘unfavourable impact (with potential for mitigation). The Council noted that the site would not be suitable if it was to come forward in isolation as it would *“lead to isolated development away from the existing settlement boundary.”*
- 2.3 The Council noted that the site presented opportunity to deliver comprehensive development alongside the adjacent SA433 site which does abut the Built Up Area Boundary of Partridge Green. The assessment concludes that the Council considered the site could deliver 110 dwellings as part of a comprehensive development alongside site SA433. The Council subsequently allocated site SA634 as part of the Regulation 18 Plan (Policies Map 15 – Partridge Green).
- 2.4 We note that the Council’s assessment appears to refer to the site promoted by BDWHS as both SA634 (correctly) and SA637 (incorrectly).
- 2.5 The site was then assessed in the Council’s Regulation 19 Site Assessment Report (Part D: Sites not identified for Potential Allocation for Housing Development) which concluded that *“The site in isolation is considered to be detached from the main body of the village and not suitable for allocation. SA637 would have to be part of a comprehensive proposal with SA433 in order for this reason to be reconsidered.”*
- 2.6 However, the Council contradict themselves by stating *“Furthermore, a comprehensive scheme comprising of SA634 and SA433 would be seen to extend the settlement form into the open countryside along Shermanbury Road in a somewhat detached extension of the settlement.”*

2.7 At Regulation 18 stage, the Council accepted that comprehensive development of both SA433 and SA634 could come forward as part of a comprehensive development, but then at Regulation 19 stage decided that the development of both sites comprehensively would consider the development of both sites together to represent a detached extension of the settlement.

2.8 It is not clear why the site at Land at Dunstons (ref. SA634) has not remained an allocation when the Council accepted at Regulation 18 stage that comprehensive development of both sites would be appropriate. BDWHSC notes that SA433 has remained as an allocation in the submission Local Plan.

2.9 The December 2023 version of the Site Assessment Report (Document H11) considered Site SA433 in Appendix C ('Sites with potential for allocation for housing development') and found:

"The site has potential for allocation for housing subject to a landscape buffer to the south, which could also provide attenuation, to protect the setting of a Grade II listed building, and a buffer to the north due to topography.

Partridge Green is recognised as a medium village in the district's settlement hierarchy and is relatively well served in terms of facilities and services. The site is not located within a protected landscape and is relatively free of constraints. The site is identified as having the capacity to accommodate 120 dwellings along with associated infrastructure.

A successful, well-designed development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries. SA433 lies adjacent to SA274 and there is an opportunity to improve connectivity and movement between the two sites. The implementation of a route between the two sites would contribute to delivering improvement to the existing infrastructure network and pedestrian/cyclist ease of movement through the village (to the school, King George V playing fields, with some relief to existing traffic flows on the High Street). These ambitions align with HDPF Policies 39 and 40 and the NPPF, as well as the aspirations of the local community given expression in their made West Grinstead Neighbourhood Plan (Aim 3: Transport)."

2.10 Site SA634 itself was considered in Appendix D ('Sites not identified for potential allocation for housing development') of Document H11 (the December 2023 report) which found:

"The site in isolation is considered to be detached from the main body of the village and not suitable for allocation. SA637 would have to be part of a comprehensive proposal with SA433 in order for this reason to be reconsidered. There are a number of sites being promoted in Partridge Green which relate better to the built-up area boundary of Partridge Green and its facilities. Furthermore, a comprehensive scheme comprising of SA637 and SA433 would be seen to extend the settlement form into the open countryside along Shermanbury Road in a somewhat detached extension of the settlement.

Any potential proposal is not likely to deliver significant amounts of community infrastructure and would be reliant on existing services within the village. The site is not within as easy walking distance of High Street as other locations and additional car journeys may be generated.

Therefore, it is not considered appropriate to allocate SA637 on its own merits nor as part of a comprehensive proposal alongside SA433. The site is not therefore recommended for allocation."

- 2.11 It is unclear why the Council ultimately decided to reject the site due to concerns over comprehensive development, given that it had previously proposed the site be allocated on the basis that comprehensive development would be required.
- 2.12 It is correct that the Site is detached from the settlement, but that ignores the fact that the Council proposes to allocate the intervening land (Site SA433). The December 2023 assessment found that "SA637 would have to be part of a comprehensive proposal with SA433" however that appears to have been exactly what the Council had expected in the earlier stages of the Plan's preparation.
- 2.13 It is not uncommon for Local Plan allocations to be amalgamated from a number of different sites, some of which might currently be detached from the settlement and it is equally common for policies to be used as a guide to how those combined sites should be developed.
- 2.14 Developing the two sites in combination would result in development further east than Site SA433 alone. However, that is not, itself, a reason to discount a site. In this case, the eastern edge of the land promoted by BDWSC is defined by existing vegetation.
- 2.15 The December 2023 assessment found that Site 643 "*is not within as easy walking distance of High Street as other locations and additional car journeys may be generated*". However, that conclusion is discredited by the fact that the Council considers the site (SA433) immediately to the west to still be acceptable (and proposed for allocation. Delivered in a comprehensive manner, as appears to have been the expectation at the Regulation 18 stage, the two sites could collectively facilitate pedestrian and cycle connections to the existing village.
- 2.16 In light of the extremely fragile nature of the housing supply position (overall throughout the Plan-period) and particularly within the first 5 years after adoption), BDWSC strongly consider that Site SA634 should be reinserted into the proposed allocations alongside the land at Dunstans Farm.

Turley Office
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830