



Examination Statement

**Prepared on behalf of Bellway Homes
(Representor Number 1198037)**

Land West of Ashington School, Ashington

Horsham District Council Local plan
Examination in Public

Relating to: Matter 8 (Housing)

Examination Statement – Horsham District Local Plan

Savills obo Bellway Homes (South London). Land West of Ashington School, Ashington



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1. Introduction

- 1.1. This Examination Statement has been prepared on behalf of Bellway Homes (South London). Bellway has submitted a planning application at Land West of Ashington School, Ashington (reference. DC/23/0406), which is currently pending Horsham District Council's ("HDC") determination (herein referred to as "the Site"). The description of development is as follows:

“Demolition of existing buildings and erection of 180 dwellings, all-weather sport pitch, sports pavilion and allotments; with associated access, landscaping, open space and infrastructure.”

- 1.2. The application will bring about several economic, social and environmental benefits including:
- 180 new affordable and market housing, of varying sizes and tenures to meet the needs of the area;
 - Green corridors and linkages to habitats outside of the site will be created;
 - Wider community benefits, such as new sports pitches and a pavilion;
 - Community allotments, to support new and local demand;
 - New residents to support the local economy; and
 - S106/CIL moneys which will include contributions to off-site community/ education facilities.
- 1.3. The Site is allocated in the made Ashington Neighbourhood Plan 2019-2031 (ANP) (under Policy ASH11), which was formally made on 23 June 2021 and now forms part of the development plan for the borough. The site is allocated for approximately 150 homes and other community infrastructure items, with the final capacity of the site informed by design considerations. A detailed planning application DC/23/0406 had been submitted in February 2023 for around 180 residential dwellings. As of October 2024, there are no insurmountable objections from statutory consultees that would prohibit delivery of 180 dwellings on site. Whilst the quantum of housing delivered in the current application marginally exceeds the draft allocation cap the development does not generate effects that cannot be mitigated; and as such it is considered that the quantum of housing is comparable to the aspirations of the site allocation within the Neighbourhood Plan. The purpose of the representations set forth in this hearing statement are to seek to secure the inclusion of the site as an allocated site under Policy AH5.
- 1.4. Our client had engaged with the Reg. 18 and Reg. 19 consultation stage with representations requesting inclusion of ASH11 as an allocated site in the emerging draft local plan. Our representations from the previous stages of the Local Plan promotion exercise are not repeated for conciseness
- 1.5. For the avoidance of doubt, any policies referred to within this Statement relate to the emerging Local Plan unless otherwise stated.

2. Response to the Inspectors Questions

Matter 8 – Housing

Matter 8 - Issue 1. Question 4. Should Strategic Policy 37: Housing Provision also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development in line with paragraph 66 of the NPPF?

- 2.1. As mentioned in relation to Question 1, Strategic Policy 37 does not reflect the overall strategy for Neighbourhood Areas, as it excludes this allocation for site ASH11. As set out in Part 3 of the Policy Horsham District Council are reliant on the delivery of net. 1795 dwellings from smaller scale allocations delivered within the development plan, or neighbourhood plans.
- 2.2. Draft Strategic Policy 38: Meeting Local Housing Needs also supports the inclusion of this Site within Strategic Policy HA5. The policy states that:
- “the Council will support schemes being brought forward through Neighbourhood Plan allocations, provided they are in general conformity with the relevant Local Plan.”*
- 2.3. The Site is also allocated in the made Ashington Neighbourhood Plan 2019-2031 (ANP) (under Policy ASH11), which was formally made on 23 June 2021. Thus, this document forms a part of the Development Plan. In that regard, given the contribution that ASH11 will make to the boroughs housing supply the site should be included within Policy HA5 for completeness.
- 2.4. The fundamental reason why allocation ASH11 needs to be recognised in the DHDLP is that the present Horsham District Planning Framework HDPF, of which the ANP comprises a constituent part, has a plan period to 2031. The DHDLP has a period to 2040. Whilst ASH11 does not have planning permission, it needs to be recognised in the fresh 15 year plan horizon of the DHDLP as contributing to the planned housing trajectory. The latest trajectory accordingly to Bellway Homes, on the assumption planning permission is granted in early 2025, will be the first residential dwellings ready for occupation by 2025/26, with the residual balance being delivered by 2029/30. The site has the potential to make a tangible contribution to delivery of housing within the first five year window of the replacement Local Plan.
- 2.5. The intent behind this approach is to ensure consistency between the made ANP and the DHDLP in relation to the Site This change is required to ensure the DHDLP includes a robust list of allocations, to provide an Inspector with certainty the District's housing need can be met and the Plan can be found sound.

Matter 8 Issue 2 – Whether the overall housing land supply and site selection process is justified, effective, consistent with national policy and positively prepared?

Issue 2, Question 1. Were the proposed housing allocations selected on the basis of an understanding of what land is suitable, available and achievable for housing in the plan area using

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an appropriate and proportionate methodology, and are there clear reasons why other land which has not been allocated has been discounted?

- 2.6. We do not believe the overall housing allocations have been selected sufficiently as the HDLP has excluded Site ASH11, from Draft Policy AH5. We consider that Site ASH11 should be included in the HDLP as a deliverable site within the early stage of the Local Plan period.
- 2.7. ***Issue 2, Question 2. The NPPF at paragraph 74 states strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period? Is this achieved by Figure 6 of the Plan?***
- 2.8. We would query the validity of the figures set within the housing trajectory and the ability of Horsham DC to deliver sufficient housing to meet future needs of residents of the borough. We do not disagree with the site selection and inclusion of a range of strategic housing sites and large / medium scale housing sites. However, we contend that the Local Plan should be providing housing which aligns with the OAN targets.
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3. Conclusion

- 3.1. This Examination Statement should be read in conjunction with the Regulation 19 Representation letter dated 1st March 2024.
- 3.2. The Site offers an excellent opportunity for the District and Ashington in providing much needed new housing, affordable housing, sports pitches, community allotments and a community pavilion. HDC should amend Strategic Policy HA5: Ashington to include Land West of Ashington School in this Local Plan.
- 3.3. The changes outlined in this representation are required to ensure the plan is capable of being found sound by an examining Inspector, who will require comfort that the plan is deliverable and facilitates a robust supply of housing over the plan period. These changes are required to ensure that the DHDLP is consistent with National Policy and is positively prepared as per the requirements of paragraph 35 of the NPPF.

Appendix A Glossary

GLOSSARY

ANP	Ashington Neighbourhood Plan
HDC	Horsham District Council
HDLP	Horsham District Council Local Plan
HDPF	Adopted Horsham District Planning Framework 2015
NPPF	National Planning Policy Framework
R18	Regulation 18
R19	Regulation 19
SAC	Special Area of Conservation
SHELAA	Strategic Housing and Employment Land Availability Assessment
SNOWS	Sussex North Offsetting Water Scheme
SNWRZ	Southern North Water Resource Zone
SPA	Special Protection Area
WRMP	Water Resource Management Plan

