

Examination of the Horsham District Local Plan 2023-2040

Further Statement in Respect of

Matter 9: Sites Allocated for Development in the Plan

Submitted on behalf of:

Wates Developments Limited

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Document Management

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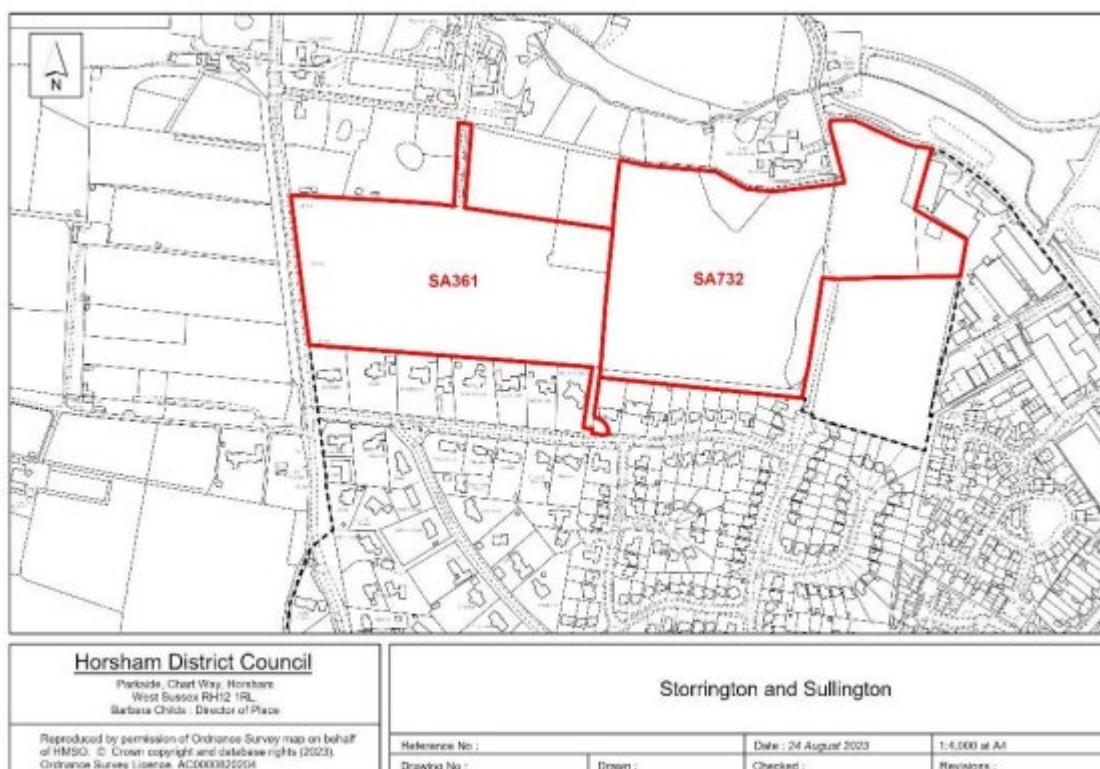
1 Introduction

- 1.1 This Matter Statement has been prepared on behalf of Wates Developments Limited (Wates) in response to Matter 9: Sites Allocated for Development in the plan, specifically in response to Strategic Policy HA18 (STO1): Storrington Housing Allocations.
- 1.2 Wates has interests in the District across 5 no. sites as set out below, and has submitted representations at earlier stages of Plan preparation at the Regulation 18 and 19 consultations:
- Land west of Worthing Road, Tower Hill, Horsham (Southwater Parish)
 - Land west of Centenary Road, Southwater (Shipley Parish)
 - Land east of Marringdean Road, Billingshurst
 - Land west of Shoreham Road, Small Dole (Henfield Parish)
 - Land north of Melton Drive, Storrington
- 1.3 Two of the above sites are allocated for residential development in the Submission Plan these are:
- Land west of Shoreham Road, Small Dole (Strategic Policy: HA16 (SMD1))
 - Land north of Melton Drive, Storrington (Strategic Policy: HA18 (STO1))

2 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?

Q14a) Is Strategic Policy HA18 (STO1) - Land to the north of Melton Drive and South of Northlands Lane, Storrington sound?

2.1 Wates is the freehold owner of the Land north of Melton Drive, Storrington (SA361 below) which comprises the western part of the Policy HA18 (STO1) Housing Allocation. For clarification, the extent of the STO1 allocation (which comprises SA361 and SA732) is shown on the plan below.



Source – (H11) Part C: Sites with Potential for Allocation for Housing Development in the Site Assessment Report (December 2023)

2.2 In July 2024 HDC published a “Schedule of Suggested Modifications to the Regulation 19 Local Plan”. Some of the Modifications relate to the text of Strategic Policy HA18 and included new criterion 4 and amended criterion c to (STO1). For clarification, the modified policy text is reproduced in full below:

Strategic Policy HA18: Storrington Housing Allocations

1. The following sites are allocated, as shown on the Proposals Map, for the provision of at least 125 homes:
 - STO1: Land north of Melton Drive, 4.7 hectares and Land South of Northlands Lane, 6 hectares (70 homes)
 - STO2: Land at Rock Road [Thakeham Parish], 3.66 hectares (55 homes)
2. Any development within Storrington must be accompanied by an Air Quality Impact Assessment and Emissions Mitigation Assessment.
3. To ensure no adverse effect on the integrity of the Arun Valley SPA/Ramsar site any application is supported by a HRA and a wintering bird survey.
4. The development is landscape-led supported by a Landscape and Visual Impact Assessment to inform site layout and capacity and safeguard any key views to and from the South Downs to minimise adverse impacts on the South Downs National Park.

In addition to meeting national and Local Plan requirements, development will be supported where proposals:

STO1

- a) Come forward as a single comprehensive development, in order to optimise the use of land;
- b) Deliver vehicular access from Fryern Lane;
- c) Have appropriate regard to the setting of West Wantley Farmhouse (Grade II*), East Wantley Farm (Grade II) and East Wantley Barn (Grade II). An appropriate buffer should be provided on the northern section of the site to retain the setting of these properties;
- d) Undertake a Landscape and Visual Impact Appraisal (LVIA) to confirm the site layout, capacity and mitigation requirements. Proposals should also look to minimise coalescence between Storrington and West Chiltington village by reflecting the settlement edge to the east; and
- e) Have regard to the setting of the South Downs National Park.

STO2

- a) Ensure that appropriate regard is given to the impact on nearby listed building Penfolds (Grade II); and
- b) Have regard to the setting of the South Downs National Park.

2.3 Paragraphs 2.4 onwards of this statement sets our response to the question posed by the Inspector and should be read in conjunction with our client's previous submissions to the Regulation 19 Local Plan Consultation. Our comments have regard to national planning policy and other material considerations.

- 2.4 As set out in Wates' representations to the Local Plan Regulation 19 Consultation, Storrington is a suitable location for housing development. Policy 2: Development Hierarchy confirms that Storrington and Sullington are one of the 10 Small Towns & Large Villages in the District. This type of settlement is characterised by a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. These settlements function as hubs for smaller villages to meet their daily needs but also have some reliance on each other to meet some of their own requirements. As a result, the small towns/large villages are the types of settlement that are considered to be sustainable locations and are capable of accommodating new sustainable development
- 2.5 Storrington and Sullington comprise one of the four main settlements in the southern part of the District along with Pulborough, Steyning and Henfield. Storrington and Sullington have a high housing need. Paragraph 3.12 of the 'made' Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) of September 2019 confirms that the housing need up to 2031 for the neighbourhood plan area was 894 dwellings, which equates to 45 dwellings per annum (dpa) between 2011 and 2031. Despite this high need, the 'made' version of the Plan only makes provision for about 116 dwellings on the allocated housing sites plus unspecified amounts of development at Old Mill Drive ('The Diamond') and the Post Office Depot. According to the SHELAA 2018/ 2019 (H13) these two sites have potential for 20 and 10 dwellings, respectively. This makes a total Neighbourhood Plan provision of circa 146 dwellings over plan period (2018 to 2031) which is significantly below the identified 894 dwellings identified in made SSWNP.
- 2.6 Since the SSWNP was made, planning permission has been granted for:
- Up to 78 dwellings on Land west of Ravenscroft Nursery, Storrington (this site was allocated for at least 35 dwellings by SSWNP Policy 2ii.) (Application Ref DC/21//2088);
- and there is a resolution to grant permission for:
- Up to 62 dwellings on Land North of Downsview Avenue, Storrington (this site was allocated for at least 60 dwellings by SSWNP Policy 2vi.) (Application Ref DC/23/0290)
- 2.7 In addition to the above, planning permission (DC/23/0701) was granted for the erection of a 60-bed care home and 8 no. age-restricted bungalows at the Old Clayton Boarding Kennels, Storrington Road, Washington on 16 October 2023. This site falls within Washington Parish but within the plan area of the SSWNP.
- 2.8 Taking the above permissions/resolutions into account including the increased provision at Ravenscroft Allotments (+43 dwellings) and at Downsview Avenue (+2 dwellings) compared to the Policy 2 SSWNP provisions and the 68 homes at the Old Clayton Boarding Kennels adds a further 113 dwellings to the notional 146 homes provision set out in the SSWNP. This results in a total of 259 dwellings either with planning permission or planned for in the Neighbourhood Plan area. Adding this figure to the proposed Local Plan HA18 (STO1 and STO2) allocations at Storrington & Sullington of 125 dwellings (for both sites) results in a combined potential supply of 384 dwellings which is significantly below the 894 dwelling need identified in the made SSWNP. This would result in a shortfall of 510 dwellings in the SSWNP plan area.

- 2.9 Based on Storrington's position in the settlement hierarchy it is in a sustainable location for development and there is clearly a high need for additional new homes both market and affordable at the settlement. This is recognised by the Council by virtue of the proposed Strategic Policy HA18 (STO1 and STO2) Storrington and Sullington Housing Allocations. As such the need for additional housing at Storrington and Sullington is clearly justified as part of the emerging Local Plan
- 2.10 The additional 125 dwellings proposed by the submitted Local Plan for Storrington & Sullington is not however sufficient to meet the recognised housing needs of the settlements As a result the Plan will not be effective in meeting the housing needs of the district or the settlement. This means the approach to development at Storrington & Sullington is not consistent with national policy at paragraph 23 of the NPPF which requires strategic policies to provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This includes planning for allocating sufficient sites to deliver the strategic priorities. As such the Plan is not positively prepared in its approach to identifying other sites (settlement site allocations).
- 2.11 As the submitted Local Plan does not provide sufficient land at Storrington & Sullington to meet the settlements housing needs it should provide more homes than the 125 dwellings currently proposed at the settlements. This can be achieved by making additional housing allocations and by increasing the amount of development on the proposed Policy HA18 (STO1) allocation by making more efficient and effective use of land.
- 2.12 As set out in Wates' representations to the Regulation 19 Consultation it welcomes and strongly supports the proposed allocation of the Land to the north of Melton Drive (4.7 hectares) and Land south of Northlands Lane (6 hectares) for housing development forming Strategic Policy HA18: (STO1). It is however still concerned about two aspects of this modified policy including:
- 1) Its allocation for only 70 dwellings; and
 - 2) the need for a single comprehensive development as per criterion a).
- 2.13 Paragraphs 3.2 to 3.8 of Wates response to the Regulation 19 Consultation set out the site background and history of Land to the north of Melton Drive (SA361), including previous applications for 102 and 67 dwellings in 2013 and 2015 respectively. They also explain the site's promotion at the various stages of emerging Local Plan and the now made SSWNP.
- 2.14 As part of the Background Evidence for the Regulation 18 Local Plan Consultation in February 2020, the District Council published a Site Assessment Report. Section 3.01 of this report is headed '**Sites with potential for allocation for housing development.**' Land to the north of Melton Drive was included in Section 3.01 (under SHELAA Ref No. SA361) with an estimated capacity of 60 dwellings. Two neighbouring sites were also shortlisted as having potential for housing allocation. These included SA732 – Land south of Northlands Lane (which is located immediately to the east of the Wates Site) and SA639 – Land off Fryern Road (which is located to the southwest). Both sites had estimated capacities of 60 dwellings each. Copies of these Site Assessments are contained in Appendix 1 of this statement .

Inefficient Use of Land

- 2.15 The first bullet point of Criterion 1 to this policy states:
- **STO1: Land to the north of Melton Drive, 4.7 hectares and Land South of Northlands Lane, 6 hectares (70 homes)**
- 2.16 The combined area of these two sites is 10.7 hectares. Whilst it is acknowledged that this Site is located in a fairly sensitive location on the northern edge of Storrington being within the Green Gap between Storrington and West Chiltington Common and in close proximity to listed buildings (West Wantley Farmhouse and East Wantley Farm/Barn) with low density residential development immediately to the south, a development of 70 dwellings across both land parcels (SA361 - Land north of Melton Drive and SA732 – Land south of Northlands Lane) would result in a development of just 6.5dph (gross). Even taking into account the constraints identified above this amount of development represents a grossly inefficient and ineffective use of land. It would result in a wasteful use of land which should be avoided.
- 2.17 This is contrary to paragraph 119 of the NPPF which confirms that *“Planning policies and decisions should promote an effective use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*. This is reiterated in paragraph 124 and also para 125 which confirms that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 2.18 As stated in paragraph 2.14 above, the Site was suggested as a potential housing site in the Regulation 18 Local Plan Consultation in February 2020 and the accompanying Site Assessment Report confirmed that the Land to the north of Melton Drive (assessed under SHELAA Ref No. SA361) had potential for housing with an estimated capacity of 60 dwellings.
- 2.19 The neighbouring site immediately to east (SHELAA Ref No. SA372 - Land south of Northlands Lane) was also identified as having potential for housing with an estimated capacity of 60 dwellings. It is important to note that there have been no significant changes since the Regulation 18 assessments for both sites were carried out. At that time, both sites were located within SSWNP Storrington to West Chiltington Green Gap, with western part of the Wates Site within a Countryside Protection View. As such the landscape constraints have not changed since the Regulation 18 Plan was published. The same situation applies to the nearby Heritage Assets of West Wantley Farmhouse and East Wantley Farm. These structures remain as Grade II* and Grade II listed buildings, respectively. The immediate settings of these heritage assets have not changed significantly.
- 2.20 The most significant change in the immediate locality is the Council’s recent decision to resolve to grant reserved matters for up to 62 dwellings on land to the north of Downsview Avenue. The approved layout for this development is shown below:



- 2.21 This site abuts the east edge of the proposed HA18 (STO1) allocation and is about 200m to the east of the Land north of Melton Drive parcel. The permitted scheme has net density of 39dph which is higher than the density of the existing development in Downsvie Road/Bannister Gardens to the south.
- 2.22 After careful consideration of the evidence base for the Reg 19 Local Plan there is no clear justification as to why the development capacity of the Wates Site and the adjoining land to the east (Land to the south of Northlands Lane - SA372) has been reduced from 60 dwellings each (or 120 dwellings combined) to the current combined figure of 70 dwellings across both sites with a gross density of just 6.5dph. This is inconsistent with the recent permission for 62 dwellings on the land to the north of Downsvie Avenue which makes efficient and effective use of land, as required by the NPPF and establishes a density of about 30dph on the northern edge of Storrington.

- 2.23 Owing to the close proximity of listed buildings to the north of both STO1 land parcels and the need to protect their setting it is envisaged that the southern parts of this allocation would be built on. This approach is demonstrated in the current proposed layout plan for the Land north of Melton Drive which is shown below:



- 2.24 This has a net density of about 26dpa which makes efficient and effective use of land whilst also taking into account the character of the surrounding area. It also reflects general transition in density moving from east (from Downsvie Avenue) to west (Melton Drive/Melton Avenue). This approach would consolidate the northern edge of the settlement whilst also respecting the Green Gap, the Countryside Protection View on the far western side of the allocation, and the setting of the important Heritage Assets located to the north. This approach make efficient and effective use of land as required by the NPPF.

Single Comprehensive Development

- 2.25 Criteria a) of STO1 requires this site ***“To come forward as single, comprehensive development, in order to optimise the use of the land”***.
- 2.26 The above wording implies that a single planning application that includes both parcels of land that comprise the STO1 allocation is required to achieve a comprehensive development of the site in order to optimise the use of the land.
- 2.27 Provided the main access road can be delivered between the two land parcels Wates does not consider it is necessary for both land parcels to be the subject of a single application and delivered at the same time and by the same developer. The proposed allocation could come forward as two separate applications for each of the land parcels i.e. one in respect of the Land to the north of Melton Drive (SA361) and the other in respect of the Land south of Northlands Lane (SA732) to deliver the quantum of development proposed, provided the schemes do not prejudice one another and obtain access from Fryern Road.

2.28 It is agreed that the land to the north of Melton Drive is best served by the creation of a new vehicular access from Fryern Road and that this could be extended across the site to link into the land south of Northland Lane (the other part of the STO1 allocation). The creation of a new access onto Fryern Road was agreed and supported by West Sussex County Council Highways for both the 2013 and 2015 applications.

2.29 Suggested Modification to Strategic Policy HA18 (STO1)

To ensure this policy is consistent with the NPPF which requires land to be developed in an efficient and effective way, the capacity of the two land parcels (Land to the North of Melton Drive and the Land to south of Northlands Lane) should be increased from 70 homes to at least 120 homes.

In addition the wording of STO1 Criterion a) should be amended to allow for the development to come forward either as a single application that covers both land parcels or as two separate applications (one for each land parcel) provided they result in a comprehensive development that makes efficient and effective use of the land. The revised wording for this criterion would read:

“Come forward by either a separate application on each land parcel or as a single application for both land parcels, which together form a comprehensive development that optimises the use of the land.”