



ALIGNMENT STUDY ON HOUSING NEEDS

**THE STORRINGTON, SULLINGTON & WASHINGTON
NEIGHBOURHOOD PLAN – 2017-2031**

APRIL 2017

1.0 Introduction

- 1.1 In support of the Pre-Submission version of the Storrington, Sullington and Washington Neighbourhood Plan, both Storrington and Sullington Parish Council and Washington Parish Council have undertaken an Alignment Study to assess whether the evidence base documents underpinning the Neighbourhood Plan in relation to housing needs conforms to the strategic policies of the Horsham District Planning Framework (HDPF). Specifically, this study seeks to align the evidence base work undertaken by the District Council in preparation of its HDPF, particularly in terms of the assessment of Objectively Assessed Housing Needs (OAN) in the district, with the evidence base documents¹ commissioned by the parishes in support of their Neighbourhood Plan.
- 1.2 In short, this document endeavours to align the studies completed on housing needs for both parishes in support of the Storrington, Sullington and Washington Neighbourhood Plan, which concentrates on affordable housing need, with the latest data that the district holds for the Objectively Assessed Housing Need (OAHN), that supported Horsham District Council in its adoption of the Local Plan in November 2015.
- 1.3 This Alignment Study on Housing Needs is split into three separate sections that are as follows:
- The district planning context and strategic policies of the HDPF and its relation to Neighbourhood Planning in the district;
 - The neighbourhood planning context for the Storrington, Sullington and Washington designated area and what has been achieved so far in other parts of the district; and
 - Whether the conclusions of the housing need studies align in this case and whether proposed housing target meets the strategic policies of the HDPF.

¹ Housing Needs Survey Report – Storrington Parish, Action in rural Sussex (AirS), October 2012 http://www.storrington-pc.gov.uk/Core/Storrington-Sullington/Pages/Storrington_Housing_Needs_Survey_2.aspx; and Housing Needs Survey Report – Washington Parish, Action in rural Sussex (AirS), November 2013 <http://www.washingtonparish.org.uk/WashingtonPC/UserFiles/Files/Neighbourhood%20Plan/Washington%20HNS%20Report%20-%20November%202013%20-%20draft.pdf>

2.0 District Planning Context

The Horsham District Planning Framework

- 2.1 In November 2015, the Local Plan for Horsham district, known as the Horsham District (HDPF) was adopted. This document now forms the overarching planning document for Horsham district. The HDPF sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs of the district, outside of the South Downs National Park, in collaboration with other local planning authorities under the duty to cooperate process. This document sets out the number of homes which need to be built in the District in the period to 2031, together with strategic locations for development, employment policies and policies to ensure that development protects the environment and landscape within the district.
- 2.2 As part of this process, the Council adopted a number of policies that related to housing provision, most notably policy 15 of the HDPF (Strategic Policy: Housing Provision) that sets out the housing requirement of the district between 2011 and 2031 and how this provision will be made. The total housing requirement for the Horsham district from 2011-2031 is 16,000 homes, which equates to an average of 800 homes per annum. This figure is to be achieved through a number of means as stated below:
- Housing completions for the period 2011 -2016;
 - Homes that are already permitted or agreed for release;
 - Strategic Sites:
 - a. At least 2,500 homes at Land North of Horsham;
 - b. Around 600 homes at Land West of Southwater;
 - c. Around 150 homes at Land South of Billingshurst.
 - **The provision of at least 1,500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning.**
 - 750 windfall units
- 2.3 As highlighted above, Horsham District Council does not specify a housing target for each parish, such as Storrington, Sullington and Washington, but instead makes a broader allocation (1,500 dwellings) for all those parishes/neighbourhood forums

engaged in Neighbourhood Plan preparation. It is anticipated that the Storrington, Sullington & Washington Neighbourhood Plan would contribute to this housing growth target through suitable site allocations within their Neighbourhood Plan. Both the quantum and appropriateness of this contribution should be based on a number of factors, including the latest evidence base documents underpinning both the parish and district council areas on housing needs, the constraints to the particular settlement and its position within the Development Hierarchy, as discussed below.

- 2.4 Policy 3 (Strategic Policy: Development Hierarchy) of the HDPF denotes the functions and roles of all settlements within the district and categorises settlements into types. There are four distinct groupings of classified settlements within this development hierarchy and a further category for unclassified settlements that are considered to be the least sustainable in terms of accommodating new development. Storrington and Sullington is considered to be within the 'small towns and larger villages' category (the second most sustainable category) that is defined, within policy 3 of the HDPF, as follows:

'These are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements/each other to meet some of their requirements'.

- 2.5 There are seven other settlements that are considered to be within this category, which includes Billingshurst, Bramber and Upper Beeding, Broadbridge Heath, Henfield, Pulborough and Codmore Hill, Southwater and Steyning. Only Horsham town is considered to be more sustainable than the settlements listed above and it is therefore anticipated that where such parishes are engaged in the Neighbourhood Planning process, they should make a proportionate contribution to the total 1,500 figure identified in policy 15 of the HDPF.

3.0 The Neighbourhood Planning Context: The Storrington, Sullington & Washington Neighbourhood Plan

- 3.1 The Storrington and Sullington Parish Council and Washington Parish Council have come together to prepare a Neighbourhood Development Plan covering their respective areas for the Plan period between 2011 and 2031. This contains planning

policies and allocations that should conform to the both the National Planning Policy Framework and the strategic policies of the Horsham District Planning Framework (HDPF). The current draft of the Storrington, Sullington and Washington Neighbourhood Plan allocates land for over 200 new homes.

- 3.2 The main evidence base documents that are pertinent to housing needs in support of the Storrington, Sullington and Washington Neighbourhood Plan are the Storrington and Sullington Parish Housing Needs Survey Report (October 2012) and the Washington Parish Housing Needs Survey Report (November 2013) that were both produced by Action in rural Sussex (AirS), which is a rural housing enabling organisation based in Sussex. The aim of these surveys was to determine the existing and future housing needs of residents, particularly those on low or modest incomes. It is noted that both reports largely concentrated on affordable housing needs and may not have effectively addressed the wider assessment of Objectively Assessed Housing Needs (OAHN) in Storrington, Sullington and Washington.
- 3.3 As stated above, the pre-submission version of the Storrington, Sullington and Washington Neighbourhood Plan does make provision for at least 200 new homes within its plan, of which 98 units at the Land at Robell Way (Paula Rosa) has already received planning permission. In terms of policy 15 of the HDPF, which notes that 1,500 homes throughout the district shall be allocated through Neighbourhood Planning, this provision of 200 new homes would equate to 13% of the district's total requirement to be allocated through Neighbourhood Planning.
- 3.4 A number of other Neighbourhood Development Plans have been or are very close to being 'made' by Horsham District Council following Referendum. This includes the parish of Nuthurst that has a 'made' Neighbourhood Development Plan, the Thakeham Neighbourhood Plan that has been through the Referendum process and is due to be made following a Council decision on 26 April 2017. In addition, two further Neighbourhood Development Plans are due to go to Referendum on 4 May 2017; Wineham and Shermanbury, and Woodmancote. In total, these rural parishes have allocated a maximum of 125 homes between them with 55 new homes allocated through the Nuthurst Neighbourhood Plan, a maximum of 20 new homes allocated through the Wineham and Shermanbury Neighbourhood Plan and 50 new homes allocated through the Thakeham Neighbourhood Plan respectively.

4.0 The District and Neighbourhood Planning Evidence on Housing Need – Drawing the Evidence Together

The District's Housing Need Evidence

- 4.1 As discussed above, the HDPF was supported by a number of evidence base documents relating to Objectively Assessed Housing Needs (OAHN) and affordable housing needs that included the 'Housing Need in Horsham District' document prepared by GL Hearn in March 2015² and the Strategic Housing Market Assessment (SHMA) that was last updated by Chilmark Consulting Ltd in October 2014³.
- 4.2 Both documents concentrated on housing needs for the district wide area, and in the case of the SHMA, this was also used for the Strategic Housing Market Area that includes both Crawley and Mid Sussex; both documents were used as evidence in support of the HDPF examination. The SHMA update, prepared by Chilmark Consulting in October 2014 concluded that the minimum net additional affordable housing needed across the district was 225 dwellings per annum (dpa). In terms of the Objectively Assessed Housing Needs (OAHN) the 'Housing Need in Horsham District' prepared by GL Hearn in March 2015 confirmed that the full objectively assessed need for housing was 636 dpa over the 2011-2031 period (i.e. 12,720 homes) and was based on the 2012 Sub-National Population Projections, which was consistent with supporting at least employment growth (labour demand) of 275 jobs per annum.
- 4.3 The Inspectors Report into the HDPF examination in October 2015⁴ did largely corroborate the evidence summarised above and stated at paragraph 39 of his report that the 650 dpa figure for OAN would support growth in the population of working age employment to meet some additional employment needs and some reduction in affordability pressures. Similarly, the Inspector concluded that almost all of the minimum core level of need (those on the housing register within the 'reasonable preference' category) can be met from the 650 OAN figure if 35% of new housing on

² Housing Need in Horsham District, GL Hearn, March 2015
https://www.horsham.gov.uk/_data/assets/pdf_file/0005/34862/Housing-Need-in-Horsham-District-23.3.15final.pdf

³ Strategic Housing Market Assessment (SHMA) update, Chilmark Consulting, October 2014
https://www.horsham.gov.uk/_data/assets/pdf_file/0008/14102/CD_H_04_NW-Sussex-SHMA-Affordable-Housing-Needs-Update-Final-Report-F071014.pdf

⁴ Report on the Examination into Horsham District Planning Framework, October 2015 -
https://www.horsham.gov.uk/_data/assets/pdf_file/0011/29684/Inspectors-Report.pdf

larger sites is for affordable housing, in accordance with policy 15 of the HDPF. It should be noted that the current requirement adopted through policy 15 of the HDPF is 800 dpa and this is because the district, through the duty-to-cooperate process, is meeting approximately half of Crawley's unmet housing need (150 homes per year).

- 4.4 The 'Housing Need in Horsham District' document produced by GL Hearn in March 2015 does provide some helpful information on the trends in the wider district in terms of both population growth and household growth from 2011 to 2031. The tables below have been taken directly from this report and illustrate the projected growth in both population and households that are based on the 2012 DCLG Household Projections published in February 2015.

Table 1: Projected Population Growth (2011-2031)

	Population 2011	Population 2031	Change in population	% Change
Horsham	131,540	148,859	17,319	13.2%
West Sussex	808,900	938,200	129,300	16%
South East	8,652,800	9,979,900	1,327,100	15.3%
England	53,107,200	60,418,800	7,311,600	13.8%

Source: ONS

Table 2: Projected Household Growth (2011-2031)

	Households 2011	Households 2031	Change in households	% Change
Horsham	55,036	66,970	11,934	21.7%
West Sussex	346,498	426,370	79,872	23.1%
South East	3,563,049	4,315,599	752,550	21.1%
England	22,103,878	26,406,679	4,302,801	19.5%

Source: ONS

- 4.5 It is noted importantly that there would be an increase in households over the 20 year period between 2011 and 2031 in the Horsham district of 11,934 (597 per annum), which equated to 21.7% change. To convert households into dwellings, this data included an adjustment to take account of vacant and second homes; a 3% figure

was derived from the 2011 Census data and added, which gave a baseline OAN figure of 615 dpa in the Horsham district that was used for the HDPF examination.

- 4.6 This same methodology can be applied to the Storrington, Sullington and Washington parish areas, where the projected household growth change for the Horsham district as a whole would be applied (i.e. the 21.7% increase in households between 2011 and 2031). The results are shown below:

Table 3: Projected Household Growth for Storrington, Sullington and Washington (2011-2031)

	Households 2011	Households 2031	Change in households	% Change
Storrington and Sullington Parish	3,254	3,960	706	21.7%
Washington Parish	747	909	162	21.7%
Combined	4,001	4,869	868	21.7%

Source: ONS

- 4.7 It should be caveated that these household figures from the 2011 Census do include households that are located within the South Downs National Park (SDNP), such as the settlement of Washington. Furthermore, although the percentage change for the Horsham district of 21.7% has been robustly developed through the 'Housing Need in Horsham District' document and was examined successfully for the HDPF, this does not necessarily mean that this percentage change should be **fully applied** to the Storrington, Sullington and Washington Neighbourhood Plan area.
- 4.8 However, this table does give an indication as to the number of new households that could be formed within the parishes between 2011 and 2031, if the projections for the Horsham district were similar in nature to those of the Storrington, Sullington and Washington Neighbourhood Plan area. In combination, the growth in households for both parishes until 2031 would be approximately 868 households based on the assumptions above between 2011 and 2031.

- 4.9 To convert households in dwellings, the previous 'Housing Need in Horsham District' document produced by GL Hearn for the district included an adjustment to take account of both vacant and second homes; in that case a figure of 3% had been used and was derived from 2011 Census data. Consequently, the growth in dwellings for both parishes until 2031 would be approximately 894 dwellings based on the assumptions above, which would equate to 45 dpa between 2011 and 2031.
- 4.10 It is clear from the figures for housing growth and the proportion of affordable housing growth identified in the paragraphs above are not reflected in policy 15 of the HDPF, which does not aim to have a proportional distribution of housing growth across the District. The overall locational strategy for the District was a strategic matter that was given careful consideration as part of the preparation of the HDPF, and the option of spreading growth to all settlements based on the size of the settlement was tested as part of the Sustainability Appraisal process, which examined a range of different plan options.
- 4.11 The outcome of the Sustainability Appraisal concluded that proportional levels of growth would be difficult to bring forward in practice given that some settlements are heavily constrained by landscape, flooding, nature and conservation designations, and would need to have their housing needs met elsewhere. A more 'equitable' locational strategy was also found to not be at a sufficient scale to generate the necessary infrastructure upgrades in some parts of the District, including roads, schools and health provision. Increased travel and the impact upon air quality, which includes an Air Quality Management Area (AQMA) in Storrington, was also identified as an issue.
- 4.12 It was therefore concluded that the most appropriate locational strategy for the District was the mix of strategic development and some smaller scale development in other settlements in accordance with the settlement hierarchy. Further detail on how this relates to Storrington, Sullington and Washington Parish is set out in section 5 of this report.

The Parishes' Housing Needs Evidence

- 4.13 As discussed above, the main evidence base documents that are pertinent to housing needs in support of the Storrington, Sullington and Washington Neighbourhood Plan are the Storrington and Sullington Parish Housing Needs

Survey Report (October 2012) and the Washington Parish Housing Needs Survey Report (November 2013) that were both produced by Action in rural Sussex (AirS). These reports were primarily based on gauging the level of need for affordable housing in rural areas and undertook Parish Housing Need Surveys that involved surveying all households within the Parish in order to identify those who may be currently, or expecting to be, in need of affordable or more appropriate housing. The survey undertaken for the Storrington and Sullington Parish included 3,571 households and had a 35% response rate, whilst the survey undertaken for the Washington Parish 900 households, with 202 survey forms returned, which gives a response rate of 22%.

4.14 It should be noted that both surveys were a snapshot at the times they were undertaken and furthermore, the response rates, although substantial, cannot give a full picture of affordable need for both parishes. Nonetheless, it was assessed that there was 13 households in housing need who have a local connection and who cannot afford to either purchase or rent on the open market in Washington Parish; and a total of 84 households that are in housing need within Storrington and Sullington Parish. It is considered that such evidence is both robust and vital in assessing affordable housing need within the Parishes, but that open market housing needs in the Neighbourhood Plan area should also be considered.

5.0 Alignment between the Neighbourhood Plan and the Strategic Housing Provision Policies of the Horsham District Planning Framework

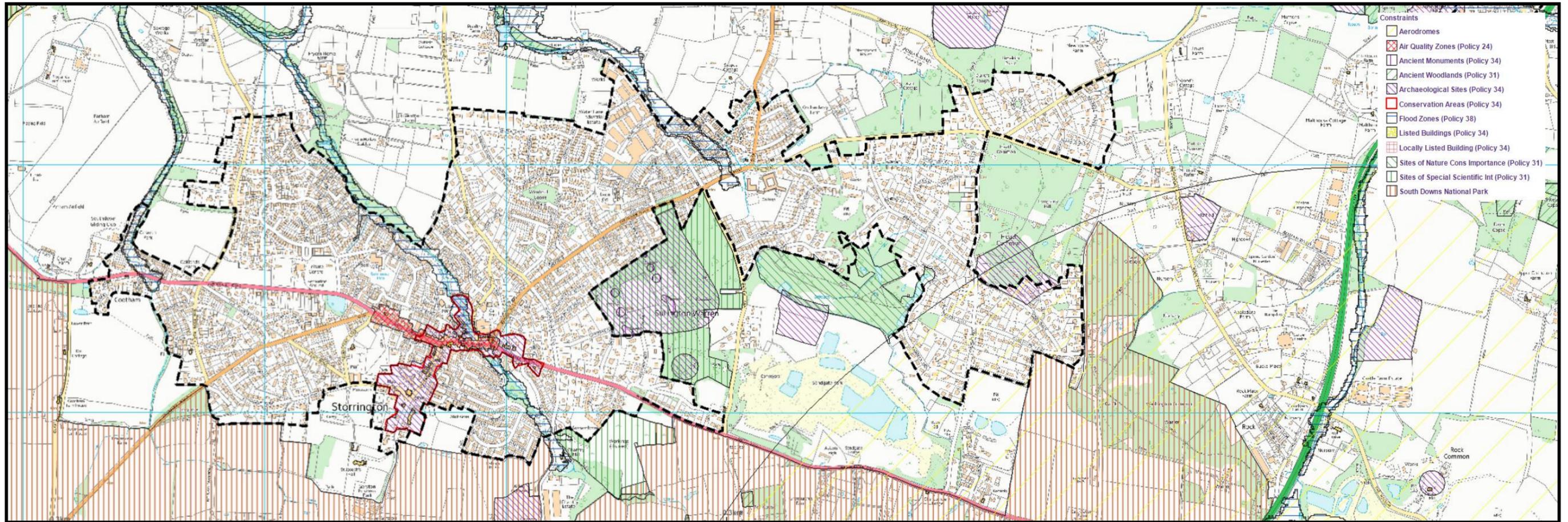
5.1 The HDPF does contain a number of planning policies that relate to both the development hierarchy of the district (policy 3) and settlement expansion (policy 4) as discussed in Section 2 of this report and these policies aim to steer new residential development away from the open countryside or in unclassified settlements and towards the larger settlements of the district, and in particular, Horsham. For the Parish of Washington, it is noted that there are no classified settlements within the land outside the National Park.⁵ The District council would not anticipate open market housing in this parish to comply with strategic policies of the HDPF and given the constraints of the National Park. It is therefore anticipated that open housing market needs within the Washington Parish would be met largely through other strategic allocations and permitted planning applications in other parts of the district (although

⁵ The Washington Village is located within the South Downs National Park (SDNP) and was categorised as a 'category two' settlement under Core Strategy policy CP5, which still applies to any land located within the SDNP, but also within the Horsham District.

very limited infill to meet a local need is being explored in accordance with Paragraph 55 of the Framework). In addition some housing growth has already been met through the completions in the Parishes covered by this study for the period 2011 - 2016.

- 5.2 As noted previously, Storrington and Sullington is described as ‘small town and larger village’ with policy 3 of the HDPF (Strategic Policy: Development Hierarchy) and would be expected to take additional housing growth in support of meeting the district wide target of 1,500 new dwellings (see policy 15 of the HDPF) where parishes/neighbourhood forums are engaged in Neighbourhood Plan making. This 1,500 dwelling figure is based upon capacity work undertaken prior to the HDPF examination and particularly the potential of known Strategic Housing and Employment Land Availability Assessment (SHELAA) sites within parishes where Neighbourhood Development Plans were in progress; it was not expected that each Neighbourhood Plan area would meet its Objectively Assessed Housing Need (OAN) in full and this would be met by other strategic allocations/planning permissions in the district, particularly in Horsham. As discussed previously, the current version of the Storrington, Sullington and Washington Neighbourhood Plan anticipates to provide over 200 dwellings in the form of housing allocations and this would be just over 13% of the district’s total requirement to be allocated through Neighbourhood Planning, which is considered proportionate given its position within the settlement hierarchy and its constraints; most notably the South Downs National Park to the south. Other significant constraints for Storrington and Sullington include flood risk areas largely to the north of the settlement, ancient woodland, heritage assets such as the Storrington Conservation Area and a Site of Special Scientific Interest (SSSI) that limits the capacity of the settlement to accommodate new housing development. A map showing geographical location of such constraints is shown below:

Storrington and Sullington Constraints Map



- 5.3 Indeed, if all of the settlements categorised as ‘small towns and larger villages’ engaged with neighbourhood planning and not heavily constrained were to similarly provide 200 dwellings through their Neighbourhood Plans, this would equate two thirds of the 1,500 dwelling requirement. With 129 new dwellings already allocated through ‘Made’ or near ‘Made’ Neighbourhood Plans (see paragraph 3.4 of this report), it is concluded that the housing provision of the Storrington, Sullington and Washington Neighbourhood Plan would support the strategic housing provision policies of the HDPF, be proportionate to its position within the development hierarchy and would align with both the District’s and Parishes’ evidence base on housing need.
- 5.4 Notwithstanding the above, if there was to be any shortfall in the provision of housing within Neighbourhood Plans for the District as a whole, Horsham District Council has programmed a review of its HDPF⁶ to commence in October/November of 2017 with adoption scheduled for the summer of 2020. It is considered that that any shortfall for the provision of housing as part of the current wave of Neighbourhood Plans can be reviewed through the HDPF review.

6.0 Conclusions

- 6.1 As discussed above, it is considered that housing provision allocated in the Storrington, Sullington and Washington Neighbourhood Plan would support the strategic housing provision policies of the HDPF, be proportionate to its position within the development hierarchy and would align with both the District’s and Parishes’ evidence base on housing need. In strategic planning policy terms, the Inspectors Report into the HDPF Examination in October 2015 at paragraph 47 noted that the number of homes being proposed within Neighbourhood Plans was inevitably uncertain but ‘that the number of 1500 over the whole district seems realistic’ and it is considered that this Neighbourhood Plan would fulfil the strategic policies of the HDPF in this respect.
- 6.2 It should also be noted that the site assessment work completed in support of the Storrington, Sullington and Washington Neighbourhood Plan has been thorough and that the Parishes have endeavoured to accommodate housing growth in their areas but, due to the availability of viable housing sites and constraints surrounding the

⁶ Local Development Scheme: January 2017 – December 2019
https://www.horsham.gov.uk/_data/assets/pdf_file/0020/43094/FinalLDS-2017.pdf

settlement, the objectively assessed housing needs cannot be fully realised. It is acknowledged by the District Council that this is a strategic issue which if the requirement of 'at least 1500 homes' cannot be met through neighbourhood planning, it will be addressed as part of the HDPF review.