

Determining an Indicative Housing Requirement Number for Neighbourhood Plan Areas:

Lower Beeding Neighbourhood Plan

November 2018

1.0 Introduction

- 1.1 Following the publication of the revised National Planning Policy Framework (NPPF) in July 2018 Neighbourhood Plan areas can request from the Local Planning Authority an indicative housing requirement number for neighbourhood plan areas.

Paragraph 66 of the NPPF states:

‘Where it is not possible to provide a requirement figure for a neighbourhood area...’, [in a local plan] ‘the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority’.

- 1.2 The Horsham District Planning Framework (HDPF) was adopted in 2015. This document sets out the planning strategy for the land in Horsham District outside the South Downs National Park in the period to 2031. It identifies a requirement for at least 800 homes to be delivered each year, and policy 15 of this document sets out how this should be delivered. This policy includes a provision for at least 1500 homes to be delivered through neighbourhood plans. This policy does not however provide a parish by parish breakdown.
- 1.3 In light of the revised NPPF, and the overall neighbourhood housing number, there has been a formal request to Horsham District Council from a number of neighbourhood planning groups for an indicative housing number for their parish¹. This paper sets out how the indicative housing number was reached for the Neighbourhood Planners at Lower Beeding Parish. It should however be noted that the formal advice which the Council has provided to all parishes who are preparing a neighbourhood plan in Horsham District is that the most robust approach to determining the housing number for the purposes of plan-making remains the formal and comprehensive housing needs assessment offered via Locality. This remains the Council’s advice in addition to any indicative figure which it is requested to provide.

¹ West Grinstead, Lower Beeding and Itchingfield

2.0 Spatial Context

- 2.1 As set out in paragraph 1.2, the most recently adopted Local Plan for Horsham District is the Horsham District Planning Framework (HDPF) which was adopted in November 2015. At three years old, the HDPF is considered to be an up-to-date development plan. The Council's five-year housing supply at the time of writing is robust with provision at 116% of its 5-year requirement.
- 2.2 Horsham District Council is committed to a review of the HDPF and a preferred options document is programmed for publication in the Autumn of 2019. This document will need to allocate individual housing requirement figures to neighbourhood plan areas. Whilst the Council has commenced the background work to inform this process, this is a complex issue, and at the time of writing, there is still as yet no definitive figure derived from the Standard Methodology for calculating housing need as set out in the updated NPPF – with further consultation on this approach scheduled for early in 2019. The wider strategic housing issue is a strategic matter for the district council and the local plan review is the appropriate mechanism which can take in to account of wider housing needs of the district. This will be supported by a robust SA/SEA process which will consider a range of alternative options and the cumulative impacts of any approach which may be selected. **The starting point for the calculation of an indicative housing number are therefore the policies contained in the adopted HDPF.**
- 2.3 An indicative housing requirement figure at neighbourhood plan level therefore differs from a district wide number; rather, it is best thought of as a locally-specific assessment bringing together data from a range of robust sources, including the HDPF, SHMA, SHELAA and other data points, to determine a notional 'fair share' of housing development that the neighbourhood plan area can contribute within the wider context of the strategic housing market area and/or Local Plan housing target.

3.0 Local Planning Context

- 3.1 Policy 15 of the adopted HDPF states the district must provide *at least* 16,000 dwellings over the plan period. Paragraph 4 states that a proportion should be delivered through neighbourhood plans as follows:
- (4) 'The provision of at least 1500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning.'*
- 3.2 Planned growth, including land allocated in a neighbourhood plan will need to be in general conformity with the strategic policies set out in Policies 3 (Development Hierarchy) and 4 (Settlement Expansion) of the HDPF in particular.
- 3.3 Policy 3 of the HDPF denotes the functions and roles of all settlements within the district and categorises settlements into types in accordance with the level of service provision to be

found within the settlement. There are four distinct groupings of classified settlements within this development hierarchy and a further category for unclassified settlements that are the least sustainable in terms of accommodating new development and should not be considered suitable for further growth during this plan period.

Policy 3: Development Hierarchy states:

Development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy below:

*Main Town;
Small Towns and Larger Villages;
Medium Villages;
Smaller Villages; and
Unclassified Settlements*

- 3.4 Policy 4 states that in order for some communities to continue to be able to grow and develop it will be necessary for them to be able to expand beyond their current built form. By applying a set of criterion though allocating sites in the Local Plan or in Neighbourhood Plans, it will be possible to meet the identified local needs of those settlements in the hierarchy and provide an appropriate level of market and affordable housing in a sustainable manner.

4.0 Calculation of Indicative Housing Figures – Policy approach

- 4.1 The first approach to the calculation of an indicative housing figure looks at the how the 1500 homes can be accommodated in accordance with the settlement hierarchy set out in policy 3 of the HDPF. To calculate Lower Beeding's fair share of the 1,500 dwellings it was necessary to apply a 'policy on' approach. Utilising 2011 Census data it has been possible to focus on the settlement hierarchy and specifically those settlements who will be contributing towards meeting the 1,500 through the neighbourhood plan process. This approach takes account of which areas have been designated as a neighbourhood planning area and focuses on delivery and implementation of Policy 15 (4).
- 4.2 The table below sets out the proportion of dwellings within each built-up area of the settlement in accordance with Policy 3. The quantum of development within each built-up area is in part reflective of the categorisation of each settlement (in addition to other factors such as the provision of services and facilities) and is also in general conformity with Policy 4 which directs growth within built up area or on the edge of settlements and not in the wider parish which would be contrary to policy and with general sustainability principles.

Table 1. Dwellings within the Built-Up Area of Settlements (2011)

Settlement Hierarchy	Number of dwellings in Built up Areas
Main Town	
Horsham	20,945
Small Town and larger Villages	
Billingshurst	3013
Bramber and Upper Beeding	1355
Henfield	2176
Pulborough and Codmore Hill	2294
Southwater	3379
Steyning	3014
Storrington and Sullington	3971
Medium Villages	
Ashington	1010
Barns Green	369
Cowfold	560
Partridge Green	825
Rudwick and Bucks Green	827
Slinfold	506
Warnham	566
West Chiltington Village and Common	3518
Smaller Villages	
Christ's Hospital	268
Lower Beeding	113
Mannings Heath	478
Rusper	266
Small Dole	331
Thakeham	602

Source: ONS 2011

- 4.3 North Horsham and Broadbridge Heath are not designated neighbourhood planning areas. The unparished part of Horsham Town, whilst designated for Neighbourhood Planning have indicated that they are not proposing to allocate land for housing development in their plan and will not be able to contribute towards the 1500 homes. The total number of dwellings in Horsham in the 2011 Census was recorded as being 56,516 dwellings. However, the total number of dwellings recorded in 2011 in all the settlements listed above is 29,431 dwellings. Lower Beeding is considered to be 'smaller village' and can be found in the fourth category that is defined, within Policy 3 of the HDPF, as follows:

'Villages with limited services, facilities, social networks but with good accessibility to larger settlement (e.g. road or rail) or settlements with some employment but limited services facilities or accessibility. Residents are reliant on larger settlements to access most of their requirements.'

- 4.4 Therefore, it is expected the Neighbourhood Plan for Lower Beeding should come forward positively to plan for proportionate contribution to the total of 1,500 dwellings identified in Policy 15 (4), centred on Lower Beeding village.
- 4.5 To calculate a local plan derived housing number for Lower Beeding, the 2011 census states 113 dwellings are recorded within the built-up area of Lower Beeding and this equates to approximately 0.38% of the 29,431 dwellings listed in Table 1 excluding Horsham town and Broadbridge Heath. It follows, Lower Beeding's proportion of local plan derived figure of the 1,500 dwellings as stipulated in Policy 15 would equate to **6 dwellings**.

5.0 Calculation of Indicative Housing Figures - Strategic Housing Market Assessment (SHMA)

- 5.1 The SHMA is a key document in the Council's evidence base that informed the HDPF. It is integral to assessing a district's housing needs for purposes of plan making and informing an overall housing requirement for the HDPF. The key document 'Housing Need in Horsham District' document was prepared by GL Hearn in March 2015 and the Strategic Housing Market Assessment (SHMA) that was last updated by Chilmark Consulting Ltd in October 2014.
- 5.2 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 so considered robust. 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.
- 5.3 The Inspector's Report into the HDPF examination in October 2015 did corroborate the evidence summarised above and paragraph 39 of his report states that the 650 dpa figure for Objectively Assessed Need would support growth in the population of working age employment to meet the additional employment needs and some reduction in affordability pressures. 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 some of Crawley's unmet housing need (150 homes per year).
- 5.4 The SHMA alongside the adopted HDPF also presents an appropriate piece of evidence to deriving an indicative housing number at the NP level, because it is an authoritative source of evidence, and because it takes into account population and household projections, as set out in the 2012 Sub-National Population Projections (SNPP) which underpinned the adopted

HDPF. SNPP provide the basis for Household Projections which guidance has state should be taken as a 'starting point' in determining need at the local authority level. Housing Need in Horsham District (March 2015) identifies an OAN for Horsham District over the plan period 2011-2031 of **12,720 homes** (Para 6.2).

- 5.5 To calculate Lower Beeding's fair share of this target, it is again possible to apply Lower Beeding's proportion of housing in the district. At the time of the 2011 Census there were 113 dwellings in Lower Beeding (56,516 in the district); proportionally representing 0.19% of all homes in the district. This does not consider the Local Plan Settlement Hierarchy and is entirely appropriate given the OAN increase represents the whole of the district over the plan period. Consequently, Lower Beeding's fair share of the 12,720 equates to **24 dwellings**.

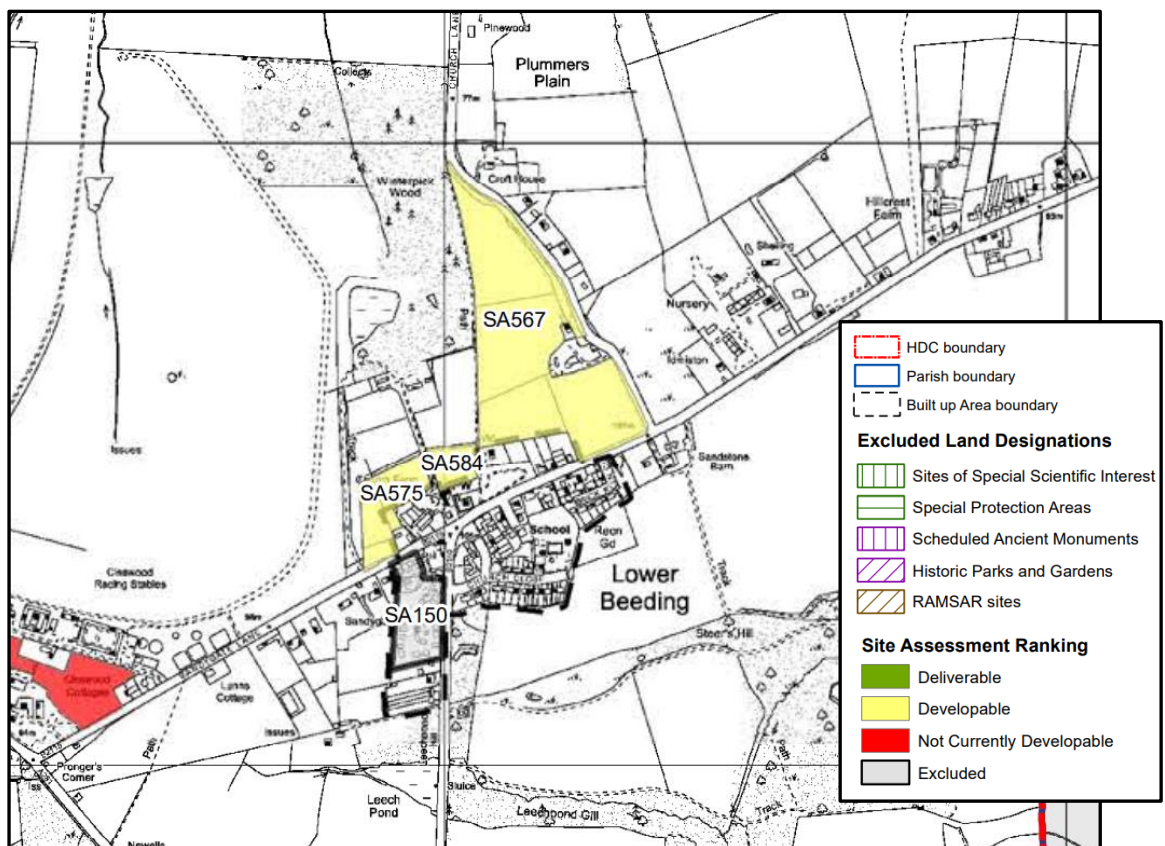
6.0 Calculation of Indicative Housing Figures - Housing Needs Registry (as of October 2018)

- 6.1 The Parish Council has supplied the District Council with a number of data sources relating to Lower Beeding Parish including the 'Community Led Plan Survey Report December 2013' undertaken externally which provided a valuable starting point for this exercise. The Parish Council commissioned Action in Rural Sussex (AiRS) in Dec 2013 to undertake the Survey to shape their vision for the Parish which looked at demographics, the type of facilities to meet residents future needs such as the desire for additional play area provision and allotment provision; the needs of the local business community with residents expressing a desire to see more local shops and businesses in the village; design and two thirds of local residents favouring small development of affordable housing. However, no formal affordable housing numbers was presented for consideration. Therefore, for the purposes of this paper the Council has sourced information on housing needs from the Housing Department at HDC. At the time of writing the HDC housing register states there are 677 households on the Council's Housing Register with 92 households stipulating Lower Beeding as their area of choice.
- 6.2 To convert households into dwellings, there was a requirement to make an adjustment to take account of vacant and second homes (a figure of 3.0% has been used; derived from 2011 Census data). This approach is consistent with the method undertaken by GL Hearn 'Housing Need in Horsham District' March 2015 which underpinned the HDPF at Examination. It follows 92 households would equate to approximately **95 dwellings**. Upon further consultation with the district's housing department it is acknowledged the housing needs register is 'live' and is adjusted regularly and that applicants to the Housing Register can select a number of choices throughout Horsham. Some applicants could potentially be accommodated elsewhere if opportunities arise, therefore the quantum of 95 dwellings is to be considered a maximum value.

7.0 SHELAA Capacity

- 7.1 In addition to the calculation of the indicative figures, the Council has also taken account of the Strategic Housing Land Available Assessment (SHLAA) to understand the context and potential capacity for development land in Lower Beeding Parish.
- 7.2 The SHLAA is a high-level assessment of land that is used as a starting point to help decide which sites are suitable, available and achievable in development terms, and could potentially be allocated for development in Local Plan documents. The SHLAA is not Council policy, and is not a definitive assessment of available sites but it is the start of a process to promote further investigation. The latest iteration of the SHELAA is available on the Council's website and at the time of writing is the 2016 version. These sites are shown in Figure 1 below.
- 7.3 Any land which is allocated for development in Lower Beeding Parish will need to be in general conformity with Policy 4 of the HDPF. It is acknowledged the Parish Council has undertaken a call for site consultation and additional land to that in set out in the Council's assessment may have come forward for consideration. Whilst it will be for the neighbourhood planners to consider the most appropriate site/s to allocate development the outcome of the Council's SHLAA assessment indicates that sufficient land subject to further detail investigation is likely to be available to meet the indicative housing figure on sites which are available, deliverable and achievable.

Figure 1. The 2016 SHELAA Assessment – Lower Beeding



8.0 Conclusions

- 8.1 The indicative housing figure is derived from robust evidence base available to the Local Planning Authority. To come to an indicative housing number of **51 dwellings** for Lower Beeding the key data sources are listed below which taken together inform key trends (please refer to Table 2). No data source was given more weight than the other as stipulated in Paragraph 66 in the revised NPPF, and the Council is of the view that it is a reasonable assumption to take the mid-point between the data sources as an appropriate method to reach an overall indicative housing number.
- 8.2 The indicative housing number does not take into account local constraints nor infrastructure capacity. It will be for the plan makers to undertake best endeavours to accommodate the number applying reasonable assumptions consistent with the principles of sustainable development to deliver the number in its entirety.

Table 2. Indicative Housing Number for Lower Beeding.

Data Source	Number of Dwellings	Mid-point
Local Plan Derived figure	6	51
SHMA derived figure	24	
Housing Needs Register derived figure	95	

- 8.3 It should also be recognised that these figures may need to be revised in the light of additional evidence (e.g. housing needs) becoming available. These figures are also only reflective of those set out in the current HDPF, and the housing need for the parish may need to be revised in due course to reflect updated needs which may emerge through the local plan process.