

Examination Statement

Matter 2

Horsham District Local Plan 2023-2040

Prepared For
Fairfax Acquisitions Limited
Representor numbers:
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1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Fairfax Acquisitions Limited, who have land interests at Newhouse Farm, Horsham, land to the north of Church Farm Walk, Upper Beeding, and Storrington (allocation HA18 ST01).
- 1.2 These representations provide a response to the matters and questions raised by the Inspector and to that extent do not focus on sites not included in the plan, that could otherwise be known as omission sites.
- 1.3 This response focuses on the questions asked in light of the soundness requirements set out in paragraph 35 of the NPPF (September 2023) that requires the plan to be positively prepared, justified, effective and consistent with national policy.



2 MATTER 2 – PLAN PERIOD, VISION, OBJECTIVES AND THE SPATIAL STRATEGY

MATTER 2 ISSUE 1 – IS THE CONTEXT AND PLAN PERIOD CLEAR AND WOULD THE STRATEGIC POLICIES OF THE PLAN LOOK AHEAD OVER A MINIMUM OF 15 YEARS FROM ADOPTION?

Question 1: The plan period is 2023/24 to 2039/2040, what is the Council’s anticipated date of adoption? Would the strategic policies of the Plan look ahead over a minimum period of 15 years from adoption as required by paragraph 22 of the NPPF? Is the approach justified, effective and consistent with national policy?

- 2.1 It will be for the Council to confirm the anticipated date of adoption.
- 2.2 It is our view that the anticipated adoption date will be later than the Council has assumed, likely later 2025, not early and therefore the plan would need to include the year 2040/2041.
- 2.3 It is relevant that the Council has asked the Examining Inspector to recommend Main Modifications, and HDC has already suggested its own main modifications to the plan. Post-hearing session, this will require consultation, further review and potentially further hearing sessions. Given hearing sessions extend into January 2025, we would anticipate adoption towards the end of 2025 at the earliest. At which point the strategic policies in the plan would look ahead 14 years, not a minimum of 15 years from the point of adoption.
- 2.4 Clearly this approach is not consistent with National Policy as it is not looking ahead the minimum requirement of 15 years. The plan will only look ahead a minimum of 14 years from the point of adoption. There is no justification for this shorter timescale. Equally this cannot be considered effective as the plan is failing to consider the long-term needs of the district, as clearly set out in the requirements of the NPPF (paragraph 22).
- 2.5 The system and approach of Government, as confirmed in the Angela Rayner’s Written Ministerial Statement (30 July 2024) is that the planning system is genuinely plan-led, that can only be achieved if the plan covers a sufficient period to enable it to be plan for the development needs of the district.



MATTER 2, ISSUE 3 – WHETHER THE SPATIAL STRATEGY AND OVERARCHING POLICIES FOR GROWTH AND CHANGE ARE JUSTIFIED, EFFECTIVE, CONSISTENT WITH NATIONAL POLICY AND POSITIVELY PREPARED?

Question 1: What is the proposed distribution of development (housing and employment) for each settlement and type identified in the settlement hierarchy (in total and for each year of the plan period)? Is this distribution justified and effective?

- 2.6 It is not clear how growth is distributed and whether the distribution accords with the settlement strategy or not. The Council will need to clarify the position on which we reserve the right to comment once clarity is provided.

Question 3: Is strategic policy 2: Development hierarchy sound?

- 2.7 We question the Council's approach to secondary settlements. The policy restricts growth within built-up areas unnecessarily and is inconsistent with other policies in the plan and national policy in that regard.

Question 4: Is strategic policy 3: Settlement Expansion sound?

- 2.8 The policy is not sound. There is no need to require water neutrality as this is better dealt with by the Water neutrality itself, policy 9. The Approach in criterion 6 does not provide any flexibility should water neutrality not be required, whereas policy 9 does.
- 2.9 Equally, criteria 1 only permitted allocated sites to be brought forward should they adjoin the settlement edge. This seems a somewhat unnecessary requirement as development should be able to be brought forward on allocated sites by their very nature. Whilst sites may or may not all be considered to adjoin the settlement edge, this may change and it is simply not necessary, given if a site is allocated for development in the process of considering that allocation HDC should have consider the appropriateness of the site.

Question 5: Should strategic policy 2 and 3 be more specific in terms of the amount of housing and employment land to be provided within each settlement or settlement type over the plan period in the interests of effectiveness?

- 2.10 If policies 2 and 3 provided the specific amount of development in each settlement it would help understand if the approach is justified and if there is sufficient focus on the



most sustainable settlements in the district. Without this detail it is difficult to comment.