

1. Introduction

- 1.1 This Examination Statement is submitted by Reside Developments. Reside Developments are in control of a number of sites within the District, including two proposed allocations and a committed site.
- 1.2 Reside's Representations to Horsham District Council (HDC) Regulation 19 Local Plan consultation were submitted by Reside Developments and Stantec on behalf of Reside Developments. Representation Numbers, 1194238, 1194243, 1194248, 1194251, 1194253, 1194255, 1194258, 1194259, 1194263, and 1194264.

2. Response to Inspectors Initial Matters, Issues and Questions on Matter 9- Issue 1 and 2

Matter 9, Issue 1 – Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

Q1. Is Strategic Policy HA1: Strategic Site Development Principles sound? The justification refers to "Strategic Scale allocations" and "smaller housing allocations" and the policy refers to land allocated for "strategic scale development". Is it clear which sites this policy applies to?

- 2.1 Reside believe it is clear what sites this policy applies too.

Q2. Paragraph 10.125 of the Plan says the total number of homes for each site allocated is expected to be within 10% of the figure quoted, is this justified and effective? The policies also refer to a number of homes to be delivered within the plan period in different ways e.g. 'at least', 'approximately'? Is this effective?

- 2.2 Reside believes that this approach is not effective will lead to an undersupply of homes from the allocated sites. There needs to certainty of what the local plan is setting out to achieve.
- 2.3 There are a lot of matters pulling on a planning application/scheme including open space and BNG for example.
- 2.4 The delivery of homes should therefore be termed as a minimum of X homes, to ensure a suitable level of delivery is met/achieved. Whether an application, and subsequent planning permission is 10% above or below an allocation figure is for the development management process to determine and balance.

Q3. Are the allocation policies all consistent with the wording in the NPPF and legislation with regard to heritage assets? e.g. preserve or enhance the character or appearance of a Conservation Area?

- 2.5 No Comment.

Q4. Are Figures 7-9 consistent with the submission Policies Map, particularly the site allocation boundaries? What is the purpose of including Figures 7-9 in the Plan, are they effective? Do they reflect the proposed level of development within the Plan period? Should they be referred to as illustrative masterplans unless approved as part of a planning application?

- 2.6 No comment.

Q5. Should Policies HA2-HA4 explicitly state whether or not a masterplan will be required as part of any planning application and whether such masterplans should include details of the phasing of development based on the development constraints and infrastructure provision?

- 2.7 Aligned with our comments elsewhere in our statements, we believe that the allocation at Billingshurst should be increased to cover a wider area of the eastern side of Billingshurst. We agree that a masterplan should be produced, and this should cover the wider eastern side of Billingshurst.

Q6. Are the employment requirements detailed in Strategic Policies HA2-HA4 consistent with other policies in the Plan? Should the requirements be specified in terms of both employment land and employment floorspace? Are the employment requirements specified within each allocation expected to be delivered within the Plan period?

- 2.8 No Comment.

Q7. Where do the neighbourhood centres sit in terms of the retail hierarchy set out in Strategic Policy 35 of the Plan? Will proposals for new neighbourhood centres need to be supported by retail impact assessment? If so, should this be specified in the relevant policies?

- 2.9 No Comment

Q8. Do Strategic Policies HA2-HA4 have sufficient monitoring and review mechanisms? Are the Plan's vision and objectives soundly based? How do they relate to the longer term context set out in paragraph 1.2 of the Plan?

- 2.10 No Comment

Q9. Is Strategic Policy HA2: Land West of Ifield sound?

- 2.11 No Comment.

Q10. Is Strategic Policy HA3: Land North West of Southwater sound?

- 2.12 We have no specific comment on the proposed strategic allocation, but Policy HA3 should be covering all of the proposed opportunities in the village. Like our comments in respect to the Billingshurst allocation, the allocation is too tightly defined and puts all the eggs into a single basket. This leaves the plan and the 5YHLS exposed to under delivery if that one site has any problems. As such, the larger settlements, such as Southwater, should be allocating additional sites, land and housing numbers. It should also include the allocation of permitted sites. Whilst there are several sites in the village with extant planning permissions, it is clear that they are part of the housing supply/delivery and should also be allocated and included in a village wide allocation and masterplan, as well as within the settlement boundary.

- Q11. Is Strategic Policy HA4: Land East of Billingshurst sound?*

a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?

- 2.13 Reside believes that Billingshurst, as one of the three larger settlements should be allocating more housing that it currently does. The village is highly sustainable and is capable of supporting far more housing. There are many options and opportunities in the village for further housing. Currently, the second largest settlement in Horsham is only being allocated a single site. This is bot shortsighted and represents poor town planning.

2.14 This approach is unsound and high-risk, and fails to deliver the true number of homes possible. Relying on a single site is not sustainable, and further allocations should be included in the plan for Billingshurst to both deliver the objectively assessed housing need and to ensure that housing is delivered in the village. Further allocations will ensure this happens and that should the current allocation be delayed, there are other sites backing up housing delivery.

2.15

b) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?

2.16 No Comment.

c) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?

2.17 No Comment.

d) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?

2.18 No Comment.

e) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?

2.19 No Comment.

f) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?

2.20 No Comment.

Matter 9, 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?

Q1. Is Strategic Policy HA5: Ashington Housing Allocation sound?

a) ASN1?

2.21 No Comment.

Q2. Is Strategic Policy HA6: Barns Green Housing Allocations sound?

a) BGR1?

b) BGR2?

c) BGR3?

2.22 No Comment.

Q3. Is Strategic Policy HA7: Broadbridge Heath Housing Allocation sound?

a) BRH1?

b) Should development be steered to part of the site at the lowest risk of flooding and has flood risk and the gas pipeline informed the site capacity?

2.23 No Comment.

Q4. Is Strategic Policy HA8: Cowfold Housing Allocations sound?

2.24 Reside refer to their Regulation 19 submissions, which demonstrate that Cowfold is a sustainable settlement, as confirmed within the plan, and is therefore capable of accommodating further growth.

2.25 The current proposed allocations are longstanding and already in the Neighbourhood Plan, the allocation in the local plan therefore do not add to the supporting the housing need. Furthermore, one site has planning permission and another is an extant planning application. As such, the housing allocation will be delivered before the plan is even adopted. Given housing allocations are proposed it is clear that the council believes the village is suitable and Sound and therefore further allocations should be proposed to meet the future need.

a) CW1?

b) CW2?

c) Is criterion a) effective?

2.26 No Comment

Q5. Is Strategic Policy HA9: Henfield Allocation sound?

a) HNF1?

2.27 No Comment.

Q6. Is Strategic Policy H10: Horsham Housing Allocations sound?

b) HOR1?

c) HOR2?

d) Is criterion g) justified and consistent with national policy?

2.28 No Comment.

Q7. Is Strategic Policy HA11: Lower Beeding Housing Allocations sound?

a) LWB1?

b) LWB2?

c) LWB3

d) Is criterion 2 a) effective? Are criteria 2 b) and c) consistent with national policy?

2.29 No Comment.

Q8. Is Strategic Policy HA12: Partridge Green Housing Allocations sound?

a) PG1?

As per our Regulation 19 representations, Reside believes this allocation is sound. Since the Regulation 19 consultation, a planning application (DC/23/2279) for 81 homes on this allocation received resolution to grant permission at committee on 17th September 2024, further demonstrating that the soundness of this allocation.

2.30 The Council have proposed modifications to the policy wording, however, Reside do not believe the changes suggested are still accurate. We understand that the Council is proposing a further modification to correct this through an additional main modification.

2.31 As such Reside has proposed to the council that in respect to criterion (a) of Policy PG1 it should read “Are limited to the southern parcel, and the eastern portion of the site northern parcel, and retain the mature tree boundaries surrounding the site”. We understand that the council supports this change.

2.32 b) PG2?

2.33 No Comment.

c) PG3?

2.34 No Comment.

Q9. Is Strategic Policy HA13: Pulborough Housing Allocation sound?

a) PLB1?

2.35 No Comment.

b) Should criterion 3 refer to 2021?

2.36 No Comment.

c) Is criterion 5 a) necessary?

2.37 No Comment.

Q10. Is Strategic Policy HA14: Rudgwick and Bucks Green Housing Allocations sound?

a) RD1?

2.38 No Comment.

b) RD2?

2.39 No Comment.

Q11. Is Strategic Policy HA15: Rusper Housing Allocations sound?

a) RS1?

2.40 No Comment.

b) RS2?

2.41 No Comment.

c) Should the policy refer to 32 homes?

2.42 No Comment.

Q12. *Is Strategic Policy HA16: Small Dole Housing Allocation sound?*

a) SMD1?

2.43 No Comment.

Q13. *Is Strategic Policy HA17: Steyning Housing Allocation sound?*

a) STE1?

b) *Are odour or noise mitigation measures necessary?*

2.44 No Comment.

Q14. *Is Strategic Policy HA18: Storrington & Sullington Housing Allocations sound?*

a) STO1?

2.45 No Comment.

b) STO2?

2.46 No Comment.

2.47 Q15. *Is Strategic Policy HA19: Thakeham (The Street and High Bar Lane) Housing Allocations sound?*

a) TH1?

2.48 As per our Regulation 19 representations, Reside believes this allocation is sound. Since the Regulation 19 consultation, the application has received officer recommendation for approval and was heard at planning committee on the 19th November 2024 where it received a resolution to approve, subject to the completion of the s.106 agreement.

b) TH2?

Q16. *Is Strategic Policy HA20: Warnham Housing Allocation sound?*

a) WRN1?

2.49 No Comment.

Q17. *Is Strategic Policy HA21: West Chiltington and West Chiltington Common Housing Allocations sound?*

a) WCH1?

b) WCH2?

c) WCH3?

2.50 No Comment.