

Horsham Local Plan EIP

Hearing Statement: Matter 2

Harlequin New Homes Ltd

34644

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1 MATTER 2: PLAN PERIOD, VISION, OBJECTIVES AND THE SPATIAL STRATEGY

1.1 INTRODUCTION

- 1.1.1 This Hearing Statement has been prepared on behalf of Harlequin New Homes Limited in response to the examination of the Horsham District Local Plan 2023-2040.
- 1.1.2 Harlequin New Homes Limited have entered into an Option Agreement for 'Land off Church Street, Rudgwick' (SHELAA Ref SA442) and are promoting the site for allocation as part of the Horsham emerging Local Plan process, with a suggested capacity for approximately 35 dwellings. It is understood that the Inspector does not wish to consider the soundness of omission sites, and therefore this Hearing Statement focuses only on the matters of soundness in respect of the submitted Local Plan and in direct response to the Inspector's Matters, Issues and Questions.

1.2 ISSUE 2: WHETHER THE SPATIAL VISION AND OBJECTIVES ARE JUSTIFIED, EFFECTIVE, CONSISTENT WITH NATIONAL POLICY AND POSTIVELY PREPARED?

Question 1

Is the vision clearly articulated? Is the relationship between the vision and objectives clear? 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?

- 1.2.1 No. The draft Local Plan sets out a single-sentence vision which is preceded by an explanation of the Spatial Context, and then is followed by topic-based explanations as to the place that the Horsham District will have become by 2040. Notably, the vision refers to a place where people can choose to live and work, but does not specifically commit to the creation of sufficient homes to meet the identified needs. This is problematic given the shortfalls within the housing strategy and unmet needs arising from elsewhere. Within the "Housing" explanation at paragraphs 3.23 to 3.24, this commitment is set but an opportunity is missed to clearly set out the benefits that housing can provide specifically to the smaller settlements, specifically the "Medium Villages" as per the Development Hierarchy (Strategic Policy 2) in terms of supporting the vitality and viability of rural businesses, services and facilities.
- 1.2.2 There does not appear to be a reference to the longer-term context of up to 30 years (ie to 2053 as measured from the start of the plan period) as set out at paragraph 1.2.
- 1.2.3 We consider it to be important that the vision and objectives are transparent, that housing needs should be met for the plan period and beyond, and that as well as providing much needed homes for people, new housing is critical to ensuring long term viability and vitality of the Medium Villages.

Question 2

Objective 9 refers to "smaller market towns" – how does this relate to the settlement hierarchy set out in Strategic Policy 2?

- 1.2.4 There is not a "Smaller Market Towns" settlement type listed within Strategic Policy 2. The hierarchy does include a range of settlements within the second tier "Small Towns and Larger Villages" and importantly a further range of sustainable settlements at the third tier "Medium Villages". Whilst the larger settlements are more likely to be considered secondary hubs, it is inappropriate for Objective 9 to apparently exclude the Medium Villages, which, as recognised within Strategic Policy 2, provide a moderate level of services, facilities and community networks, together with some access to public transport. These settlements, for example Rudgwick which our client has an interest in, contain local facilities that are important to the local population, specifically those without easy access to a private car. These local facilities often suffer from poor economic climates given the rise in online shopping and centralising of functions, and it is important that their continued important local role is recognised and protected.
- 1.2.5 As such, it is considered that Objective 9 should more appropriately refer to the Small Towns, Larger Villages and Medium Villages (tiers 2 and 3 on the Development Hierarchy) and should highlight that these all play a role in terms of providing employment, retail, leisure and recreation, and that these local facilities will be supported.

Question 3

Do the objectives recognise the need for and role of services and facilities outside of the main town, smaller towns and villages (Tier 1 and 2)? If not, should they?

- 1.2.6 No. The Development Hierarchy at Strategic Policy 2 recognises that the Medium Villages provide a level of services, facilities and community networks, together with some access to public transport. These facilities are of key importance to the local population, particularly those without access to the private car, and it is important that these facilities are supported to retain and maintain the sustainability of these important settlements. This can be achieved through supporting growth in these settlements, including a commitment to meet local housing need.

1.3 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?

- 1.3.1 Harlequin wishes to comment on the proposed distribution of development to Rudgwick, as opposed to the other settlements. 66 homes are allocated to Rudgwick on two sites. The trajectory for this delivery is unclear.
- 1.3.2 Rudgwick is categorised as a Medium Village, on the third tier of the Development Hierarchy. The village is considered by HDC to have “a reasonable service provision including a primary school, public houses and village store with a post office. There are a range of sports facilities and a good variety of clubs and societies for all interests and ages.” Accordingly, all opportunities should have been taken to allocate sustainable sites and to support the existing services and facilities and to deliver proportionate growth to Rudgwick. There should be no theoretical cap to development capacity without evidence.
- 1.3.3 Whilst the Inspector does not want to consider the soundness of omission sites, as is appropriate for this stage of the Examination process, it is important to highlight that further sites are available and that evidence has been provided at the regulation 19 stage to support a further allocation. We have criticised the SA process within our regulation 19 representations, as we do not consider the site selection process in Rudgwick to be justified.

Question 3

Is Strategic Policy 2: Development Hierarchy sound?

Crawley been dealt with effectively in the settlement hierarchy?

f) Does Policy 2 limit development to within defined built-up area boundaries and secondary settlement boundaries? Is this approach consistent with paragraph 4.31 of the Plan which refers to “limited development” outside these locations? Is it clear what is meant by “limited development”?

- 1.3.4 No. Strategic Policy 2 is not consistent with paragraph 4.31 which is considered to plan positively to meet local needs in sustainable locations. Strategic Policy 2 must make it clear that the Medium and Smaller Towns and Villages have the potential to meet housing needs outside of the settlement boundaries, subject to environmental constraints and local character being retained.

Question 5

Should Strategic Policies 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?

- 1.3.5 Yes, Strategic Policy 2 should, in order to give clear direction to Neighbourhood Plan groups who may wish to develop Neighbourhood Plans for their areas. Strategic Policy 3 however is considered to deal with potential additional development, over and above specific allocations to settlements and sites. As

such, it is not considered necessary for further detail to be added to Strategic Policy 3, in terms of potential amounts of development.