

22 November 2024

### Online/Email submission only

The Programme Officer  
Horsham District Council

SLR Project No.: 433.000043.00001

Dear Inspector Fleming,

## **RE: Hearing Statement ID04 Horsham Examination – Matters, Issues, and Questions (MIQs)**

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### **Matter 9, Issue 2 – Question 17**

On behalf of our client, Concept Developments, we write in response to the Horsham District Council Local Plan Examination matters issues and questions (ID04), dated 14 October 2024. Concept Developments have a legal interest in land known as 'Land East of Hatches House' in West Chiltington ("the site"). Therefore, this statement will focus on question 17(c) of Matter 9, Issue 2 which pertains to the soundness of Strategic Policy HA21: WCH3 Land East of Hatches House.

For ease/clarity, question 17(c) of Matter 9, Issue 2 states:

***'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?'***

*Question 17. Is Strategic Policy HA21: West Chiltington and West Chiltington Common Housing Allocations sound?*

- a) *WCH1?*
- b) *WCH2?*
- c) *WCH3?'*

Strategic Policy HA21: WCH3 sets out three criteria that the proposed development should comply with, including:

- 'a) Protecting the rural character and approach to the settlement, including through retention and enhancement of the trees and hedgerows around the site;*
- b) Retaining the setting of the listed building at Naldrett's Farm; and*
- c) Ensuring existing rights of way within and adjacent to the site are not adversely affected or provide replacement provision.'*

In answering question 17(c) of Matter 9, Issue 2, we refer to paragraph 35 of the National Planning Policy Framework (NPF) which provides the test of 'soundness' for examining plans:

- a) ***'Positively prepared*** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs (footnote 21 of the NPPF); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) ***Justified*** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. ‘

This same test of ‘soundness’ is applied to the strategic policy in question, HA21: WCH3. As stated in our Regulation 19 submission, we are fully supportive of this policy and residential allocation and consider that it would form part of a sound spatial strategy for new residential development in the District over the Plan period, in line with the tests set out above.

The policy supports Horsham District Council (HDC) in meeting the district’s assessed housing need with the delivery of 8 dwellings in a sustainable location and with criteria which ensure that development is sensitive to its surrounding context. We, therefore, consider that Strategic Policy HA21: WCH3 has been **positively prepared**, in line with the ‘soundness test’.

As part of its Local Plan evidence base, HDC has published a Site Assessment Report (December 2023). The Assessment confirms that the site (ref. SA500) has no overriding constraints preventing development of the site and it is largely unconstrained. It is not designated as being of landscape or nature conservation importance and is well-screened by defined hedgerows which incorporate a number of trees. The Council’s Landscape Capacity Study (2021) found the area to have moderate-high capacity for small scale housing development. It concludes the site has good potential for development subject to suitable consideration in the design of development, biodiversity, and mitigation of impacts on the historic environment and air quality in Storrington. The policy and housing allocation have been informed by proportionate evidence in the form of HDC’s Landscape Capacity Study (2021) and Site Assessment Report (December 2023), as such, we consider the policy **justified**, in line with the ‘soundness test’.

The site is allocated for 8 dwellings which is a smaller scale site but is nevertheless critical to contributing to the delivery of HDC’s housing requirement. HDC is also reliant on a number of larger scale sites which are important but often accompanied by requirements to provide infrastructure upfront which adds to the delivery timeframe of the housing supply. The allocated site (WCH3: Land East of Hatches House) is sustainably located, benefiting from amenities within West Chiltington, identified as a ‘medium village’ in the draft Local Plan, with a moderate range of services, facilities, community networks, and access to public transport. The delivery of the site is therefore not dependent on the upfront delivery of additional infrastructure or resident amenities. In addition, a planning application is currently under determination (ref. DC/22/0639) for 8 dwellings which also addresses the requirements of the Strategic Policy. Therefore, it is our view that the policy and housing allocation is deliverable over the plan period and likely to be delivered in the short term. Thus, we consider the policy **effective**, in line with the ‘soundness test’.

As mentioned above, the site and the potential for development have been appropriately assessed and given its location and that it’s largely unconstrained, its allocation enables the delivery of sustainable development made in accordance with the policies in the NPPF. Therefore, it is considered that the policy and housing allocation are **consistent with national policy**, in line with the ‘soundness test’.

Overall, we acknowledge that the site and housing allocation would seek to meet the areas assessed needs, has been assessed in terms of development constraints, is supported by proportionate evidence, is deliverable and is considered to be sustainable development. In response to question 17(c) of Matter 9, Issue 2, we therefore consider that Strategic Policy HA21: WCH3 Land East of Hatches House is sound, being positively prepared, justified, effective and consistent with national policy, in line with the tests set out within the NPPF.



For the avoidance of doubt, Paragraph 35 of the NPPF is referred to for the test of 'soundness' in respect of Strategic Policy HA21: WCH3 and our response does not offer a position for the soundness of the Plan as a whole.

Should you wish to discuss further please do not hesitate to contact us.

Yours faithfully,

**SLR Consulting Limited**



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