



Hearing Statement – Matter 2: Plan Period, Vision, Objectives and Spatial Strategy

**Horsham District Council Local Plan 2023-2040:
Examination in Public**

Prepared on behalf of Thakeham Homes Limited

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1.0 Introduction

- 1.1** This statement has been prepared by SLR Consulting Ltd on behalf of Thakeham Homes Limited in respect of the Horsham District Council Local Plan (2023 – 2040) Examination in Public. The Statement focuses on questions raised by the inspector in their MIQs in relation to Matter 2: Plan Period, Vision, Objectives and Spatial Strategy.



2.0 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?

Q1: 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 of 15 years from adoption as required paragraph 22 of the NPPF? Is the approach justified, effective and consistent with national policy?

- 2.1 The Council’s most recent Local Development Scheme (December 2023) expects the plan to be adopted by May 2025 but given that the Examination Hearings are timetabled to take place between December 2024 and January 2025, it is unrealistic to assume that the plan will be adopted by May 2025, considering the Council is likely to need to consult on Main Modifications, plus the time it takes thereafter to proceed to formal adoption.
- 2.2 It is more realistic therefore (assuming the plan proceeds through Examination as per the Council’s intentions) that the plan will not be adopted until August/September 2025 at best.
- 2.3 In the best-case scenario of adoption in mid/late 2025, the plan period which currently runs to 2039/40 would be looking ahead to less than the minimum period of 15 years which fails to meet the minimum requirements of Paragraph 22 of the Framework.
- 2.4 Accordingly, it is considered that the plan period should be extended by at least a further year (to 2040/41), which would therefore require additional sites to be allocated to address the additional requirement that an extra year in the plan period would result in.

Q2: Paragraph 1.2 of the Plan says the Plan considers a longer term context up to 30 years for strategic scale development. Which specific parts or policies of the Plan specifically considers this longer term context e.g. the “Strategic Site Allocations” and is the Plan effective in this regard?

- 2.5 The plan is not effectively planning for longer term development up to 30 years. Looking at the four strategic allocations listed in the housing trajectory, one will be built out long before the end of the plan as it is a small allocation (Billingshurst), leaving only three strategic sites to seek delivery near the end of the plan period and into the next longer-term plan. Given the lead in times that some strategic sites can have, the Council should look to have an additional strategic site.



3.0 Issue 2 – Whether the Spatial Vision and Objectives are justified, effective, consistent with national policy and positively prepared?

Q1: 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?

- 3.1 If the Council is to attempt to achieve its vision as set out on page 16 of the plan, which clearly states the vision is “A place where people from all backgrounds can choose to live and work...” then it must seek to make sufficient provision to meet objectively assessed needs for housing.
- 3.2 Our regulation 19 representation sets out the median house price to income ratio is now 13.18 in Horsham (an increase of 34% since 2019) which shows house prices are spiralling out of control in Horsham due to lack of supply.
- 3.3 Our representation also set out how the position for people needing affordable housing is even worse with the local plan only seeking to provide half of the identified need of affordable homes.
- 3.4 We cannot see therefore how the plan, as submitted, meets the vision of providing a place where people from all backgrounds can choose to live. If you are on a low income or in need of affordable housing, you will have little chance of being able to choose to live in the district.
- 3.5 Part of the Council’s vision as described in paragraphs 3.23 and 3.24 is said to deliver housing to meet the government’s housing growth aspirations, and states that this will meet the needs of the district’s residents and, if possible to contribute towards the unmet need of other authorities. The plan is not consistent with this element of the vision as it is not meeting the needs of the district, as it is planning for a shortfall of 2,275 homes that the district itself needs and is not providing for any unmet need. The Written Ministerial Statement of July 2024 endorses the plan making approach to delivering the Government’s vision of achieving sufficient housing across the country through the local plan.
- 3.6 It is our client’s view that the plan fails to deliver the aims of objectives 1 and 10 (as listed in Table 1) as the quantum of housing proposed falls far short of the identified needs and therefore is not providing sustainable development and will not provide a sufficient range of housing for young people or families as they will be priced out of the housing market. The plan arguably doesn’t therefore plan for the economic objectives either (7 and 8) as the local businesses will not be able to attract suitable



local staff to work in their businesses and will have to rely on people commuting from cheaper areas, undermining the sustainability arguments.

- 3.7 A new sustainable settlement such as Wealdcross can contribute to the Council's vision by offering a ready-to-go solution to meet the district's remaining unmet housing needs and the development will also provide for around 1,225 affordable homes.



4.0 Issue 3 – Whether the Spatial Strategy and overarching policies for growth and change are justified, effective, consistent with national policy and positively prepared?

Q1: 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?

Q2: Is Strategic Policy 1: Sustainable Development sound? a) Should this policy or its justification have a greater emphasis on reducing the need to travel by private motorised transport?

- 4.1 The distribution of development as proposed in the plan follows the capacity and function of the settlement types listed in the development hierarchy, with the larger, more sustainable settlements taking the majority of the district's growth.
- 4.2 However, the Updated SA clearly sets out that the preferred strategy taken forward at the previous regulation 19 stage amended the approach taken in the regulation 18 plan as it "...recognises housing market limitations whereby putting too much development in one part of the district can put rates of delivery at risk. It is a balanced strategy which builds on the settlement hierarchy (including sustainable urban extensions), whilst also planning for a new garden village community." (p.80 of 2023 SA).
- 4.3 Therefore, the Council realises that development needs to be spread across the district to ensure delivery rates can be met and a new settlement was part of that strategy due to acceptance that there is only so much development existing settlements can deliver.
- 4.4 Therefore, we do not believe that the distribution of development will be effective and will not deliver the housing numbers expected. The majority of the sites in the plan will be seeking to meet the needs of the Horsham / Crawley area in the north but a new community in the middle of the district at Wealdcross will provide for housing needs from the middle and south of the district, such as Worthing, as well as the north.
- 4.5 The Council has accepted a new approach to the spatial strategy was needed but has undermined it by removing Wealdcross from the plan.
- 4.6 Our client's view is that a step-change in Horsham's spatial strategy is required which looks to add to the Council's proposed strategy of expanding the district's



- existing settlements by focusing new strategic scale growth in a sustainably located garden village.
- 4.7 It is of note that the plan makes no mention of the previously supported option of a new settlement (Land at Buck Barn) and there is no mention of why the Council changed its mind on the previously agreed suitability of this option.
- 4.8 The Council's Spatial Strategy Topic Paper (HDC02) gives the history of the plan from 2018 and quotes different strategies that were explored. However, nowhere does the Topic Paper mention that the previous (withdrawn) strategy included a new garden village which had a Sustainability Appraisal that supported its inclusion. We find this omission to be surprising, and not supported by robust evidence
- 4.9 Our client submits that for the Council's housing needs to be met and for the plan to be found sound, the plan's spatial strategy must be reconsidered to include another layer of growth which sits alongside the proposed urban extension strategy. This will ensure no area is saturated and that housing delivery can be effective. The new layer must be an innovative solution to housing delivery that delivers a high volume of homes alongside the supporting infrastructure that is required to create a sustainable new garden village such as Wealdcross. This was the Council's previous strategy before it removed the site due to the alleged impact of water neutrality.
- 4.10 The NPPF sets out three overarching objectives which contribute to achieving sustainable development. So that sustainable development is pursued in a positive way, the NPPF sets out a presumption in favour of sustainable development (NPPF paragraph 10). The presumption, as it applies at the plan making stage is set out at paragraph 11(a) of the NPPF. The plan strategy does not seek to meet the development needs of the area, let alone contribute to meeting needs which cannot be met within neighbouring areas. None of the exceptions set out at paragraph 11(b)(i) and (ii) apply, and therefore the plan's strategy is fundamentally at odds with the central policy in the NPPF and is unsound. Further by underproviding the amount of housing in the plan, the Council's businesses will be relying on people who cannot afford to live in the district to commute in. This is already a recognised problem within Horsham and this plan will simply exacerbate the problem. A new settlement in the centre of the district with a large number of affordable homes would go some way to reducing this impact.



