



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

Horsham District Council – Examination in Public

Prepared on behalf of Miller Homes Ltd

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SLR Project No.: 433.000082.00001

20 November 2024

Revision: 00

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
00	12 November 2024	AM	NB	NB
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Appendices

Appendix A Campsfield, Southwater - Location Plan

Word Count (excluding title pages, contents, appendices, questions and footnotes): 1,777 words



1.0 Introduction

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Miller Homes Ltd 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.
- 1.2 By way of background, Miller Homes has an interest in land at Campsfield, Southwater ('the site'), which is located on the southern edge of Southwater and has capacity to deliver up to 80 new homes on the edge of one of the district's most sustainable settlements. The location of the site is shown in Appendix A.
- 1.3 Miller Homes also made representations at the Council's regulation 19 consultation stage, and a Hearing Statement has also been submitted in relation to Matter 8 (Housing).



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.

2.5 Our client’s site at Campsfield (located to the south of Southwater - see Appendix A) would be an ideal site to select as an additional allocation to help meet the increased needs arising from the requirement to add an additional year to the plan period.

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?

2.6 No comment.

Q3: Is paragraph 2.12 consistent with the Levelling Up and Regeneration Act (2023) in relation to the South Downs National Park?

2.7 No comment.

Q4: Do the Chapter 1: Introduction and Chapter 2 Planning Context sections of the Plan adequately explain the role and relationship between the Plan and the Neighbourhood Plans (made or in preparation) in delivering the development required in the district?

2.8 Chapter 1 does not contain detail on the role of Neighbourhood Planning in the context of Local Plan making. Chapter 2 (paragraph 2.18) briefly explains what Neighbourhood Plans are, but more could be said about how Neighbourhood Plans interact with the Local Plan, and what each are required to do (or not do).

2.9 For clarity and transparency for all involved in the plan making process, it would be useful if this section could explain how the Council intends for sites to be allocated (i.e. is there a size threshold for sites to be included in a Local Plan vs a Neighbourhood Plan), and whether it is appropriate for sites be included in both.

2.10 Our client’s site at Campsfield is geographically located within Southwater Parish, but is not located within the defined boundary of the Southwater Neighbourhood Plan area. It is important in unusual situations such as this that sites outside of a Neighbourhood plan area but with a close physical and communal relationship with an adjoining settlement are still able to contribute towards meeting housing allocated to specific neighbourhood or parish areas to deliver.



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 Part of the Council’s vision as described in paragraphs 3.23 and 3.24 of the Plan is to deliver housing to meet the government’s growth aspirations, so that homes are provided which people can afford, and which offer a choice of types, sizes and tenures. The objectives that follow (Table 1) aim to ensure the vision is realised.

3.2 It is our client’s view that the plan fails to deliver the aims of objective 10 (as listed in Table 1) as the quantum of housing proposed falls far short of the identified needs. As discussed further under Matter 8, the sole reason for the reduction in housing requirement – the water neutrality issue – is not accepted either in principle or in respect of precisely how the figure has been reached,

3.3 If the Council is to aspire to achieve the vision as set out on page 16 of the plan, then the minimum housing requirements must be delivered in order to ensure Horsham is a place where *‘people from all backgrounds can choose to live and work’*.

3.4 Additional allocations of sites in sustainable and well-contained locations can contribute to the Council’s vision by offering a ready-to-go solution to help to meet the district’s remaining unmet housing needs.

Q2: Objective 9 refers to “smaller market towns” – how does this relate to the settlement hierarchy set out in Strategic Policy 2?

3.5 ‘Smaller market towns’ is not a category in the development hierarchy (Policy 2), but presumably these settlements fall into the ‘Small Towns and Larger Villages’



category (tier 2 settlements such as Southwater). A Main Modification to correct this wording should be made for clarity.

Q3: 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?

3.6 No comment.



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?

- 4.1 The general approach to distributing 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), and this approach is not disputed.
- 4.2 The total number of homes allocated in and around these settlements does not however meet the minimum identified housing needs of the district (as derived from the Standard Method) resulting in an unmet need of 2,275 to 2024.
- 4.3 As such, the plan must look to allocate more suitable housing sites in order to demonstrate that it has been positively planned and works to meet the needs identified going forward.
- 4.4 The general spatial strategy as proposed by the Council (and supported by the updated SA) to distribute development proportionality amongst its settlements in accordance with the hierarchy (Strategic Policy 2: Development Hierarchy) is logical and has worked successfully for the district in the past. The continuation of this growth strategy is therefore supported.
- 4.5 It follows therefore, that in order for the Council to demonstrate that the identified needs are being positively planned for, additional housing sites should be allocated in sustainable settlements in line with the hierarchy. Southwater continues to be defined as a 'second tier' settlement in the Council's hierarchy which given the range of services and facilities found in the village, is a correct placement.
- 4.6 Additional allocations are preferred, but failing this a policy which enables sustainable development to come forward outside of a specific site allocation would be appropriate, which could be based broadly on the criteria of Policy 3 (notwithstanding our comments on these criteria – see below) and the Council's



current Facilitating Appropriate Development (FAD) document. Such an approach has been used by other Council's facing housing deliverability issues, such as Fareham Borough Council's recently adopted policy HP4.¹

4.7 Our client's site at Campsfield has the capacity to deliver around 80 homes in a highly sustainable and accessible location and performs well against the FAD criteria as confirmed by recent pre-application advice from HDC. The Council have developed the SNOWS scheme as a offsetting scheme and have also accepted other solutions and thus the water neutrality issue is not a reason for preventing sustainable development coming forward.

4.8 The Council's minimum housing need needs to be met and for the plan to ultimately be found sound, additional allocations in line with the proposed spatial strategy must be found and added to the plan as Main Modifications. Failing that, a more permissive policy approach to development in sustainable locations should be adopted.

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?

4.9 Policy 1 reflects the requirements of the National Planning Policy Framework and is therefore sound. Reducing the need to travel by private motorised transport is part of considering whether a proposal is 'sustainable development', so the view of our client is that no more emphasis is required in this regard.

Q3: Is Strategic Policy 2: Development Hierarchy sound?

a) Are the settlement types described justified and effective?

4.10 Whilst our client is in agreement that Southwater is rightly placed as a 'second tier' settlement owing to its good range of services, facilities and connections; it is not comparable to some other settlements also in this category which are much smaller

¹ Fareham Local Plan 2037 (adopted April 2023)



and less sustainable than Southwater. Examples include Pulborough, Upper Beeding and Bramber.

- 4.11 To correct this, it is suggested that a new ‘second tier’ category is included for settlements such as Southwater, Billingshurst and Broadbridge Heath to separate them from other, smaller settlements such as Henfield, Storrington and Steyning.

Have all relevant settlements been identified and placed in the correct settlement type?

b) Have Air Quality Management Areas informed the classification of settlements into settlement types?

- 4.12 No Comment

c) Are the built-up area boundaries and secondary settlement boundaries justified and effective?

- 4.13 We agree with the extension of the built-up area boundary of Southwater to include the already built out Mulberry Fields development. This would unlock the opportunity for a further logical extension to the settlement boundary through the allocation of land at Campsfield, Southwater for residential development.

d) What is the relationship between settlement types, settlement boundaries and the sites allocated in the Plan? Has land West of Ifield allocated in the Plan adjoining Crawley been dealt with effectively in the settlement hierarchy?

- 4.14 No Comment

e) 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”?

- 4.15 As afore mentioned, if insufficient allocations are made to meet HDC’s need and assist in meeting recognised unmet needs, a policy allowing development that is sustainably located to allow ‘limited development’ outside of built-up area boundaries is considered appropriate. As it stands, policy 2 is inconsistent with both



Local Plan Paragraph 4.31 and the wider requirements to meet housing need within sustainable locations.

Q4: Is Strategic Policy 3: Settlement Expansion sound?

- a) Is it consistent with other policies in the Plan?**
- b) Is it justified and effective in terms of the approach to development outside of built-up area boundaries, secondary settlement boundaries or sites allocated in the Plan?**
- c) Does this policy apply to all settlement types identified in Strategic Policy 2?**
- d) Is it clear how a decision maker should react to the term “defensible boundary”?**
- e) Does criterion 6 unnecessarily duplicate other policy requirements and is it necessary to reference any other specific development constraints such as those related to transport or the natural environment?**
- f) Is the geographical application of this policy on the Policies Map effective?**

4.16 In order for the plan to show it has been positively prepared, Policy 3 should be re-worded to allow for more flexibility for suitable sites to come forward that adjoin a settlement boundary.

4.17 Part 1 of the policy as drafted, restricts such growth to sites that are allocated; but in the context of the failure of the proposed plan to meet the district’s identified housing needs, our client submits that the policy should allow sites that adjoin a settlement boundary to be acceptable provided that all other criteria are also met.

4.18 Criteria 3 should also be clear that consideration of sites against this policy should be measured against the housing need as defined by the SM and HDC’s progress in meeting that need across the district.

4.19 Such a permissive policy would open the opportunity for housing sites to come forward in sustainable locations (by virtue of being located next to an existing settlement) and would work to complement the spatial growth strategy already proposed by the Council which favours proportionate growth of existing settlements.



Critically it would also boost the supply of housing, given HDC are proposing insufficient allocations to meet their needs.

- 4.20 Criterion 6 (water neutrality) duplicates the requirements of Policy 9 and is not necessary. If its inclusion is to remain, an amendment would be needed to make clear that should the need to demonstrate water neutrality no longer be required the building regulation optional water use requirements should take precedent.

Q5: 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?

- 4.21 No comment.

Q6: Should the role of Neighbourhood Plans be more clearly articulated in Strategic Policies 2 and 3 or their justification text in the interests of effectiveness?

- 4.22 No comment.



5.0 Issue 4 – Whether the strategy and overarching policies for growth and change in Horsham Town and Broadbridge Heath are justified, effective, consistent with national policy and positively prepared?

5.1 No comment on issue 4.





Appendix A

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



