

Horsham District Council 2024-2040 Local Plan Examination MIQs

Matter 1, Issue 2 – Whether the Council has complied with other relevant procedural and legal requirements? Plan Preparation

Harwoods Ltd: Five Oaks site, Billingshurst

Report date: November 2024

Prepared for:
Harwoods Limited

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Where great relationships yield the best property outcomes

Matter 1:

Issue 2: Whether the Council has complied with other relevant procedural and legal requirements? Plan Preparation

Q4. Does the SA assess all reasonable alternative spatial strategy options, levels of housing and employment need and options relating to other policies in the Plan? Where it is considered that there are no reasonable alternatives, relating to all policies in the Plan is this clearly explained?

Our clients, Harwoods Limited, have made previous representations throughout the call for sites and Draft District Plan process in March 2020, April 2023 and February 2024, in regard to potential future redevelopment opportunities on their site in Five Oaks.

Our clients own the 1.45ha brownfield site which is identified in the Draft District Plan as being located outside of the Built-Up Area Boundary (BUAB), but comprises brownfield land within the hamlet of Five Oaks and on a major A-road route between Billingshurst and Horsham.

In the Draft Plan **Policy SP2 Development Hierarchy** Five Oaks, is maintained as a secondary settlement in tier 4 which is defined as *“Very small villages and hamlets that generally have some limited local employment, services or facilities (which may include primary schools, allotments, village halls, playing fields, or a church) and/or evidence of a defined local community. Proximity and access to other services, facilities and employment is also taken into account. Additionally, settlement character is material, for example form, density, age and historic character of dwellings, and the overall sense that one has left the open countryside and entered a defined village community.”*

Our previous representations have questioned the **Reg-19-Secondary-Settlements-Review** which indicate that Five Oaks *“has a small service station including a shop and some limited employment from existing businesses. The settlement is close to Billingshurst which is designated as small towns and larger villages in settlement hierarchy and has a large range of service and facilities. And we have sought clarity about why the site has not been changed to a Tier 2 given this recommendation to **“Designate as Secondary Settlement”**”.*

The SA seeks to ensure that a clear spatial strategy has been addressed and we would argue that such alternate designation has not been considered which can further restrict potential redevelopment.

Under Policy **SP3: Settlement Expansion**, there is acknowledgement that growth of existing settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs.

The policy SP3 also states that *“Outside built-up area boundaries, the expansion of existing settlements will be supported where all of the following criteria are met:*

- 1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;*
- 2. The level of expansion is appropriate to the scale and function of the settlement type.*
- 3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.*
- 4. The impact of the development individually or cumulatively does not prejudice comprehensive long-term development, in order not to conflict with the development strategy.*
- 5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced; and*
- 6. The development can conclusively demonstrate that it is water neutral in accordance with other development plan policies.*

Whilst we support flexibility in the potential expansion and growth for settlements, we do not believe that brownfield sites should have to meet all criteria, as it infers that any such redevelopment on a site like Five Oaks could be resisted. Therefore, the SA has not considered all reasonable alternatives.

As with our clients MIQS for their Pulborough Site (to be read in conjunction with this Five Oaks MIQS submission, we also do not believe that a more appropriate higher growth scenario for a “unconstrained water neutrality spatial strategy” has been adequately assessed under the SA. With such a small amount of residential development, provision of employment and housing is therefore unfairly being inappropriately being constrained, rather than encouraged, especially for sites that can address on site solutions on previously developed land.

Its redevelopment could positively contribute to the local area as an extension to the tier 4 village of Five Oaks. It is believed that the plan and its SA evidence base as currently drafted does not consider fully all reasonable alternatives, and instead relies on the constraint of water neutrality to limit development within the plan period.

Despite the stepped housing trajectory, this is considered too restrictive and on-site solutions, as well as a strategic solution or offsetting, can facilitate further delivery towards the identified but unmet housing or alternative mixed use or employment need, especially on village extension sites such as Harwoods Five Oaks.