

Horsham District Council Local Plan 2023-2040 Examination

Matter 2: Plan Period, Vision, Objectives and Spatial Strategy

User ID: 1194360

Address: Land North and South of West End Lane, Henfield, West Sussex

Prepared as a response to Matters, Issues and Questions (MIQs)

On behalf of: **B Yond Homes Limited:**

Date: November 2024

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Introduction

1. This Hearing Statement is for and on behalf of B.Yond Homes Limited, as prepared by Vail Williams LLP.
2. B.Yond Homes Limited (formerly Rydon Homes Limited) are promoting two sites, both within Henfield. This response to the MIQs is related to the land north and south of West End Lane, Henfield (ID number: 1194360).
3. B.Yond Homes Limited (as Rydon Homes Ltd) have regularly submitted information and representations to Horsham District Council, including the Regulation 19 stage.
4. This Hearing Statement is concerned with **Matter 2 (Plan Period, Vision, Objectives and Spatial Strategy)** as set out in the Inspector's Matters, Issues and Questions (MIQs) and has been prepared on the basis of the submitted Local Plan and the relevant evidence base.
5. This Statement supports the representations previously submitted by B.Yond Homes Limited under the Regulation 19 stage and only responds to the relevant questions for B.Yond Homes Limited raised within the MIQs.

Matter 2: Plan Period, Vision, Objectives and Spatial Strategy

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 2039/40, 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 para 22 of the NPPF? Is the approach justified, effective and consistent with national policy?

Q2: Para 1.2 of the Plan says the Plan considers a longer term context up to 30 years for strategic 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?

Paragraph 22 of the NPPF makes reference to strategic policies looking ahead over a minimum 15 year period and this is to "Anticipate and respond to the long term requirements and opportunities, such as those arising from major improvements in infrastructure".

As previously set out in the Regulation 19 representations, the strategy proposed in the Plan for housing delivery is significantly under the identified housing need. Primarily, this is due to water neutrality being considered as an absolute constraint to future development (including as set out in paragraph 7.1 of HDC Topic Paper 1, the Spatial Strategy). However, as per paragraph 22 of the NPPF, policies should anticipate and respond to opportunities such as major improvements in infrastructure. It is considered the strategic policies setting overall housing numbers and allocations do not take into account the possibility of infrastructure upgrades and improvements, or other solutions / mitigation, relating to resolving the constraints of water neutrality that would enable increased delivery of housing to, at least, meet the OAN.

As identified in the MIQs, paragraph 1.2 of the Plan also makes reference to a longer-term context of up to 30 years in relation to strategic scale development. Over such a time period, it is highly likely that

solutions and suitable mitigation will emerge for the current constraints and, consequently, the Plan is not considered justified and consistent with national policy.

The Plan period, and strategic policies, are therefore considered limited and unnecessarily constrained, whereas plan making has the potential and scope to address longer term issues and, particularly in this instance, water neutrality.

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

Q.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?

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

Q.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?

In relation to Henfield, it is not considered that the role "small town and larger villages" has been fully acknowledged and recognised. The settlement of Henfield, as identified in the settlement hierarchy in Strategic Policy 2, is one of the most sustainable settlements within the District with only Horsham Town ranked higher.

However, as set out in the Regulation 19 representations, it is only proposed to deliver 55 additional homes (through one allocation) compared to other settlements, such as Stenning that is proposed to deliver 265 additional homes.

Therefore, it is considered that in relation to Henfield, the Plan does not provide consistency between the spatial objectives and the proposed allocations. Q2 above refers to Objective 9, which states that "*The smaller market towns will be recognised as secondary hubs and encouraged to meet local needs and act as a focus for a range of activities...*" The proposed allocation of a single site, for a highly sustainable settlement, over the whole Plan period is not considered compliant with the objectives identified within the Plan. As a sustainable settlement, Henfield is capable of supporting greater levels of growth to ensure the Plan delivers on the promised Objectives.

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?

Please see comments above in response to other MIQs and the Regulation 19 representations.

It is considered that the proposed distribution of development is not reflective of the settlement hierarchy. Henfield is identified as a highly sustainable location, offering "*A good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements or each other to meet some of the relevant requirements*".

Given the sustainability of the settlements identified, and its category within the settlement hierarchy, it is considered that Henfield is, and should, be capable of accommodating more development than a single proposed allocation over the whole Plan period. Henfield is considered disproportionately underrepresented for housing allocations when compared to other settlements within the same tier.

Q.3. Is Strategic Policy 2: Development Hierarchy sound?

- a) Are the settlement types described justified and effective?*
- b) Have all relevant settlements been identified and placed in the correct settlement type?*
- c) Have Air Quality Management Areas informed the classification of settlements into settlement types?*
- d) Are the built-up area boundaries and secondary settlement boundaries justified and effective?*
- e) 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?*
- 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"?*

Regarding the built-up area boundaries being justified and effective, it is noted that the promoted site by B.Yond Homes Limited will be adjacent to the built-up area once the proposed allocation (HNF1) is allocated. Consequently, it is considered that a site adjoining a proposed allocation should, therefore, be classified as adjacent to the built-up area and can be assessed accordingly within the SHELAA. As per the Regulation 19 representations, this is unnecessarily constraining the potential sites and development opportunities within Henfield.

Q.4. 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?*

Please see commentary within Regulation 19 Representations.

Q.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

Q.6. 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?

In terms of strategic policies 2 and 3 being more specific in relation to the amount of housing, it is considered these policies draw on the allocations, consequently providing an indicative number of homes that will be delivered for each settlement. As set out above, there is a discrepancy between the settlement hierarchy (and sustainability strategy) and proposed housing allocations. Settlements within the same tier have significantly varying allocation numbers; from 55 additional homes (through one allocation) proposed in Henfield, to Stenning that is proposed to deliver 265 additional homes. Whilst site (and settlement) specifics need to be considered, the evidence base includes numerous other potential sites that could have been proposed allocations, delivering much need homes.

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