



Homes
England

Horsham District Local Plan 2023-2040 Examination in Public

Matter 5 – Development Quality, Design and
Heritage

Hearing Statement

Date: November 2024



Issue 1 – Whether the approach to Development Quality, Design and Heritage is justified, effective, consistent with national policy and positively prepared?

1. Introduction

1.1 This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site HA2 in the Horsham Local Plan 2023-2040.

1.2 This statement supplements Homes England’s previous representations to the Horsham District Local Plan Regulation 19 consultation. Where relevant separate submissions will be made in relation to Homes England’s other land interests.

2. **Q1 - Is Strategic Policy 19: Development Quality sound? - b) Should the opportunities associated with strategic scale developments be recognised in this policy, particularly with regard to creating defensible boundaries?**

2.1 Homes England is supportive of Policy 19, however, clarity is required on how this policy will co-exist with Strategic Policy HA2 (2) which outlines the Land West of Ifield development will be in accordance with a comprehensive site-wide Design Code. Strategic Policy HA2 (2) also sets out that the Design Code will be prepared by the site promoter and not the Local Authority.

2.2 Policy 19 takes a broad approach to development quality and fails to recognize the importance and unique opportunity presented by strategic scale developments. Whilst it is important to maintain high quality across all development and there are design considerations that can be applied to development of all scales, there are development and design considerations that are uniquely applicable to strategic scale developments. It is important that the policy recognizes the role strategic sites play in delivering growth and meeting housing targets within Horsham, the ability for further growth within these strategic sites should not be confined to the same policy considerations as development of a smaller scale. The unique opportunities of strategic scale development and the role they play can play in future growth should be recognized within the wording of Policy 19, with a view to not just the emerging plan period but beyond.

2.3 In relation to Part B, Policy 19 also fails to recognize the opportunity of strategic allocations to create new defensible boundaries and therefore is not effective or justified. Strategic scale development is an opportunity for the Local Authority and developers to create defensible boundaries through a design-led approach, the approach would create opportunities for further growth. Strategic development includes the creation of new road networks and green infrastructure, examples of defensible boundaries, and this should be recognized and included within the policy wording to ensure opportunities for future growth are identified at the design stage of strategic allocations.

3. Q1 - c) Should any specific development constraints be identified that can significantly influence the design of any scheme such as the presence of utilities infrastructure or flooding?

3.1 Paragraph 16, part C of the NPPF states that plans should be *“shaped by early proportionate and effective engagement between plan-makers and communities, local organisations, businesses and infrastructure providers and operators and statutory consultees”*. It is important to understand and set out the implication development constraints will have on delivering growth within the area based on evidence from relevant parties.

3.2 Local Plan Policy should set out any restrictions development constraints could have and measures that will need to be implemented to adapt or mitigate development in areas with development constraints through a design-led approach.

3.3 A key example is the impact of the Gatwick Airport extension. As set out by Gatwick Airports Regulation 19 response, the extent of the proposed policies map allocation (HA2 – West of Ifield) overlaps with the land safeguarded for the expansion of Gatwick Airport. There are also concerns raised regarding the impact of noise could have on the West of Ifield site. Strategies to deliver growth in areas with development constraints is currently unknown, design is a key delivery means to overcome development constraints. Policy 19 should acknowledge that constraints will establish and inform the parameters of development and how it can be shaped to mitigate or adapt to overcome these constraints through the design policy.

4. **Q3 – Is Policy 21: Heritage Assets and Managing Change within the Historic Environment sound and legally compliant?**

- 4.1 As noted within our Regulation 19 submission, the text within this policy should align with national policy in order to be considered sound and avoid confusion in relation to the application of the substantial harm and less than substantial harm tests.