

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: Pulborough site.

Report date: November 2024

Prepared for:
Harwoods Limited

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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, own 2 sites at London Road, Pulborough which have both been promoted throughout the call for sites and Regulation 18 and 19 stages for potential alternative development. The site on the eastern side of the A29 currently operates as a car showroom for Harwoods Land Rover and Bentley. And the site to the west is used for associated car parking. Our clients eastern site 1.1ha is a brownfield site including 0.7 of Previously Developed Land with 0.4ha of woodland, with c0.4ha of brownfield land to the west.

The sites are identified for potential redevelopment in the Pulborough Neighbourhood Plan July 2024 referendum version (p33-34) under Policy 5a and 5b as sites PPNP06 and PPNP07.

Throughout the District Plan Process our clients have sought to maintain future flexibility for the site, should it be required, and how it may have the potential to complement the existing village of Pulborough for either residential, mixed and/or commercial uses.

The Inspectors Matters Issues and Questions (MIQS) asks if all reasonable alternative spatial strategy option have been considered. Whilst the Sustainability Appraisal (SA) has considered a number of large sites and small sites across the Plan period 2023-2040 to inform the HDC spatial strategy, we do not agree that all reasonable alternative options have been considered, especially those in recent Neighbourhood Plans.

HDC through its SA and wider evidence base confirm that water neutrality is acting as a constraint to development and that lower growth options therefore should be considered. Specifically in section 6.40 the SA states that as a result of water neutrality *“The requirement for the emerging Local Plan to be water neutral has greatly narrowed the scope for growth at the current time”*.

Section 6.47 also confirms that a lower growth scenario is the outcome of this environmental constraint *“the Council provides evidence that realistically, the amount of housing development that can be supported over the 17-year Plan period is 13,212 homes. This equates to an average delivery rate of 777 homes per year”*. This contrasts to the 5 growth scenarios considered in the SA that range from 1000-1800 dwellings per annum (dpa).

In regard to how much and where any new development should take place, Section 6.52 of the SA also states that *“Because the issue of water neutrality has stymied housing delivery during the early plan period and will continue to be limited to some degree by the availability of water offsetting credits, it also means that a lower amount of development can come forward by way of site allocations. Because of this the conclusions of the Sustainability Appraisal 2021 needed to be reconsidered. The draft Regulation 19 LUC SA Document of July 2021 indicated that urban extensions (together with some more limited growth of smaller villages and towns), were more sustainable than the provision of new settlements. This is consistent with our client’s promotion of their site at Pulborough, as growth within smaller villages and towns for alternative uses within the plan period 2023-2040.*

The SA therefore fails to adequately support small unidentified sites that could increase redevelopment opportunities on brownfield sites, especially those consistent with **Strategic Policy 2 – Development Hierarchy and Settlement Expansion** which supports development in defined built-up area boundaries including infill and re-development, providing that it can demonstrate appropriateness in terms of the nature and scale ‘to maintain the characteristics and function of the settlement in accordance with the settlement hierarchy’.

The settlement hierarchy positions Pulborough within the ‘Smaller Towns and Larger Villages’ settlement type which is the 2nd highest ranking tier. This means that the settlement is considered to be highly sustainable, relative to other settlements in lower tiers, and one of the main settlements in the district.

Our client’s site is located within the built up area boundary (BUAB) for Pulborough and in accordance with **Policy SP2 Development Hierarchy**, development on this site is permitted in principle, however with a reduced growth target, opportunities for spatial growth within the BUAB such as our client site, and those that can address water neutrality with on site solutions have not been adequately considered as part of the SA, and the wider evidence base.

This also aligns with the Pulborough Neighbourhood Plan that states under **Policy 5a & Policy 5b** which support “*mixed use development comprising retail, commercial or community uses*” and approximately 15 dwellings on the western side of the A29 and 9 dwellings on the eastern side of the A29.