

# Horsham Local Plan 2023-2040 Examination

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

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## 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?

**Q.1: 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?**

1. As per the Council's latest Local Development Scheme (2023 -2026), the Plan is due to be adopted in May 2025<sup>1</sup>.
2. However, if there are any delays to the examination of the Plan it is essential that the Plan-period is adjusted accordingly to ensure that it can comply with paragraph 22 of the Framework<sup>2</sup> and, consequently, be found sound.

**Q.4: 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?**

3. No. Further explanation should be provided.
4. Neighbourhood Plans can have an important role to play in delivering the development required within Horsham District. However, there is no certainty that new Neighbourhood Plans will come forward, or made Plans updated to allocate additional sites to meet strategic housing and employment requirements in an emerging Local Plan.
5. It should be recognised that the Horsham District Planning Framework (November 2015) requirement of at least 16,000 dwellings<sup>3</sup> between 2011-2031 upon which made Neighbourhood Plans (that allocates sites) are based is out-of-date in accordance with paragraph 33 of the Framework. Therefore, it follows that Neighbourhood Plans are also out-of-date and need to be updated to reflect updated housing and employment requirements. Furthermore, the made Neighbourhood Plans within Horsham District are based on a different plan period to the emerging Local Plan and will need to be updated to reflect this. There is no certainty that this will take place.
6. As identified in our Matter 8 Statement, the implications of the inconsistency between the emerging Local Plan and adopted Neighbourhood Plan periods has skewed the Plan's site selection process.
7. As an example, in assessing site ref. SA005 within Part D of the Site Assessment Report<sup>4</sup>, the Council references allocations made within the extant Henfield Neighbourhood Plan as part of the rationale for limiting further growth at the settlement. However, Policy 2 of the Henfield Neighbourhood Plan is clear that it only allocates sites to deliver 270 dwellings over the plan-period (i.e. up to 2031).
8. Notwithstanding whether this level of housing is proportionate to the scale of the settlement (a matter considered further in our response to Question 1 under Issue 3 of this Matter) or the fact that this is based on an out-of-date Horsham District

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<sup>1</sup> Page 9

<sup>2</sup> Framework paragraphs referred to are from version published in September 2023 which Local Plan is being examined against

<sup>3</sup> Set out in Policy 15

<sup>4</sup> Document ref. H11

housing requirement, there would be a period between 2031 (i.e. the end of Neighbourhood Plan period) and 2040 (i.e. the end of Local Plan period) without any housing delivery from sites allocated by the Henfield Neighbourhood Plan, unless it is updated. As set out earlier in response to this Question, there is no certainty that an update to the Henfield Neighbourhood Plan will take place and there is no housing requirement set for an update to the Henfield Neighbourhood Plan by the Plan.

9. The emerging Local Plan only proposes 55 additional dwellings (50 according to the Council's revised trajectory<sup>5</sup>) in Henfield, which are anticipated to be completed by 2031/2032. Therefore, there is no planned growth in Henfield, one of the most sustainable settlements within Horsham District, over the period 2032-2040.
10. Paragraph 66 of the Framework states that: *"strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations"*. This was a shortcoming of the Horsham District Planning Framework and must be addressed by the Plan if it is to effectively *"set the framework for the preparation or review of existing Neighbourhood Plans"*, as specified by paragraph 2.18 of the Plan.
11. Furthermore, there is no certainty at present that updated Neighbourhood Plans will come forward even if a housing requirement is attributed to the neighbourhood areas, therefore there also needs to be a mechanism in the Local Plan to ensure additional growth takes place in the Plan period to deliver the development required within Horsham District in the event that Neighbourhood Plans do not facilitate the required level of additional growth.

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

### 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?

12. Paragraph 3.1 of the Plan states that Horsham is *"predominantly rural in character, containing a number of smaller villages and towns"*. It is therefore important that the role of services and facilities in the other settlements beyond Tier 1 and 2 is recognised.
13. Partridge Green is designated as a Medium Village (Tier 3) in the settlement hierarchy and is identified as having *"a good range of services and facilities"* in the Settlement Sustainability Assessment 2019-2022 (July 2024)<sup>6</sup>. It specifically states that *"development would help to ensure that local services and facilities remain viable"*.
14. As such, the role of services and facilities in settlements other than Tier 1 and 2 should be recognised in the Local Plan objectives.

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<sup>5</sup> Appendix 1 of document HDC03

<sup>6</sup> Document ref. EN07

## Issue 3: Whether the Spatial Strategy and overarching policies for growth and change are justified, effective, consistent with national policy and positively prepared?

**Q.1: 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?**

15. No – the distribution is not justified.
16. Strategic Policy 2 does not include a distribution of development for housing and employment for each settlement and type. It is therefore not clear how much development is allocated to each settlement type or individually across each settlement.
17. To establish the spatial strategy, it is necessary to read the individual policies for each settlement set out later on in the Plan<sup>7</sup>. However, these policies only relate to sites allocated as opposed to the overall level of growth expected to be delivered at each settlement.
18. Notwithstanding this, as outlined at paragraphs 4.34 – 4.38 of the Regulation 19 representations (representor ref. 1211284), the spatial strategy is imbalanced and does not provide land for housing where it is needed in accordance with paragraph 8a) of the Framework.
19. It is also apparent that there is inconsistency regarding the level of housing proposed to be delivered within settlements in the same tier of the settlement hierarchy defined by Strategic Policy 2. As an example, Henfield (Tier 2) is only allocated 55 dwellings up to 2040. In comparison, other Tier 2 settlements including Southwater (1,000), Billingshurst (650) Storrington (125), Steyning (265), Broadbridge Heath (130) have been allocated much more housing. Furthermore, more housing is allocated at the Tier 4 settlements of Small Dole (80 dwellings) and Thakeham (65 dwellings).
20. Continuing with the example of Henfield, the Henfield Parish Council Housing Needs Assessment Final Report (October 2017), which is an evidence base document in support of the Henfield Neighbourhood Plan, identified that 4.3% of the homes of Horsham District were within Henfield as of the Census 2011. On this basis, it indicated that Henfield should accommodate 688 dwellings over the Neighbourhood Plan period (2011-2031) – 4.3% of the Horsham District housing requirement of 16,000.
21. The 2021 Census demonstrates that 4.27% of the total number of homes within Horsham District are within Henfield; therefore, on the basis of the Plan's housing requirement of 13,212 dwellings (notwithstanding separate points regarding the soundness of this figure), a proportionate housing supply for Henfield would be 564 dwellings. The level of housing proposed to be delivered at the settlement falls significantly short of this even if the Neighbourhood Plan allocations are factored in (noting that these only cover, at most, 6-years of the Plan period).
22. Henfield is not subject to any abnormal constraints that justify restricting its growth in accordance with paragraph 11b) of the Framework and sites have been made available at the settlement, as identified by the Regulation 19 representations (representor ref. 1211284).

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<sup>7</sup> Strategic Policies SA2-SA21

23. As demonstrated by the Regulation 19 representations (representor ref. 1211284), Henfield has potential to accommodate significantly more growth than 55 dwellings in the plan period up to 2040 in a sustainable manner.

**a) Should this policy or its justification have a greater emphasis on reducing the need to travel by private motorised transport?**

24. Yes.
25. The Department for Energy Security & Net Zero published the 2023 UK greenhouse gas emissions, provisional figures in March 2024<sup>8</sup>. These figures demonstrate that domestic transport is the largest source of emissions in the UK, amounting to 29.1% of the total emissions in 2023.
26. Accordingly, it is evident that the most effective means of responding positively to the climate emergency is to ensure that spatial strategies for local plans is underpinned by allocating new development in locations where there is the greatest potential to encourage sustainable lifestyles and reduce the need to travel by private car, which is a key contributor to greenhouse gas emissions and climate change.
27. Accordingly, this requirement should be clearly apparent within Strategic Policy 2.

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

28. No
29. As set out within the Regulation 19 representations, further development is required to meet the minimum Local Housing Need for Horsham District. To achieve this, additional sites should be allocated and included within revised built-up area boundaries.
30. In-line with our response to Question 4 within this Issue of this Matter, the current settlement boundaries and the associated policy requirements constrain the Plan's ability to deliver the minimum Local Housing Need, which is inconsistent with the requirements of the Framework.

**Q.4: Is Strategic Policy 3: Settlement Expansion sound?**

31. No.
32. To achieve the social objective of sustainable development, paragraph 8b) of the Framework is clear that the planning system should ensure *“that a sufficient number and range of homes can be provided to meet the needs of present and future generations”*. Paragraph 60 of the Framework emphasises the importance of delivering a sufficient amount of land for housing where it is needed. Paragraph 61 subsequently states that the minimum number of homes needed is determined by the Standard Method.
33. Accordingly, it is critical that the Plan does all it can to deliver the homes required. Noting the requirements of paragraph 35d) of the Framework, the Plan cannot be concluded to be sound unless it achieves this.

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<sup>8</sup> [2023 UK greenhouse gas emissions, provisional figures](#)

34. As set out within our Matter 1 Statement, it is clear that the Duty to Cooperate discussions have been based on the Council having adopted a position regarding the level of housing that it can deliver based on water neutrality constraints. In turn, this has informed the setting of the housing requirement of 13,212 homes, 2,275 below the Local Housing Need derived via the Standard Method, and the stepped trajectory set out by Strategic Policy 37. However, the Plan does not facilitate the delivery of additional development where water neutrality mitigation is available.
35. In this context, it is unclear what the purpose of Strategic Policy 3 is and, accordingly, whether it conforms to paragraph 16f) of the Framework. Strategic Policy 3 is a policy with a series of requirements that must be met comprehensively; therefore, if a site is not identified as an allocation (failing the requirements of criterion 1) its development cannot comply with Strategic Policy 3 and would be inconsistent with the development plan even if the remaining criteria are all satisfactorily addressed.
36. This, therefore, does not facilitate delivering further homes to address the identified minimum Local Housing Need of Horsham District even if all other requirements of Strategic Policy 3 as well as all other relevant policy requirements of the Plan could be addressed – notably, water neutrality mitigation (criterion 6 of Strategic Policy 3 and Strategic Policy 9).
37. Turning back to paragraphs 8b), 60 and 61 of the Framework, through the restrictions imposed by Strategic Policy 3 combined with the failure to plan for the minimum Local Housing Need the Plan prohibits the achievement of these requirements.
38. Accordingly, Strategic Policy 3, when read alongside the inability to meet the minimum Local Housing Need, is unsound.
39. To address this soundness failure, Strategic Policy 3 should be amended to separate the requirement for allocation from the remainder of the policy. This would facilitate the delivery of further sustainable development to help the Council meet the minimum LHN for Horsham District and conform to the requirements of the Framework.

**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 settlement type over the Plan period in the interests of effectiveness?**

40. Yes
41. It is not currently clear how much housing and employment is proposed in each settlement/settlement type over the plan period. This means that it cannot be established whether the spatial strategy is sound.

**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?**

42. Yes.
43. For the reasons set out in response to Question 4 under Issue 1 of this Matter, the Plan is inconsistent with paragraph 66 of the Framework, and it is unclear how a neighbourhood plan could be assessed against the requirements of paragraph 29 of the Framework.



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