



MATTER 2, ISSUE 3: SPATIAL VISION AND OVERARCHING POLICIES

1 Introduction

- 1.1 This statement has been prepared on behalf of Our Place Sustainable Development Limited ('Our Place'). It follows the Inspector's Notes ID03 (Examination Guidance Note) and ID04 (Matters, Issues and Questions) and considers the soundness of the Submitted Regulation 19 Local Plan (SD01).
- 1.2 As background, Our Place is both the landowner and the master developer for the proposed 150 ha Kingswood new settlement. Located close to Adversane¹ south of Billingshurst, it has the potential to deliver 2,850 homes, employment and town centre uses (providing 2,450 jobs)² with associated open space, schools, community facilities and infrastructure. Despite Our Place proactively engaging with the Council throughout the local plan process, having signed up to a planning performance agreement (PPA) and providing extensive evidence to demonstrate the unconstrained and deliverable nature of Kingswood, it has been unjustifiably omitted from the Local Plan³.
- 1.3 This Statement summarises why the processes followed by the Council are unsound and not positively prepared in respect of the questions posed by the Inspector in relation to this matter. Statements have been lodged in respect of other matters and, where appropriate, these are referenced in this statement.

2 Matter 2, Issue 3 – Whether the Spatial Strategy and overarching policies for growth and change are justified, effective, consistent with national policy and positively prepared?

- 2.1 Our Place have fundamental concerns about the overall Spatial Strategy and do not consider it to be justified, effective, consistent with national policy or positively prepared. These are explained in detail in other Matter Statements and, in summary, include:
 - 2.1.1 *Matter 3:* How claimed water neutrality imperatives have overly constrained housing growth whilst, at the same time, creating unacceptable uncertainty due to a lack of clarity about permanent solutions and how interim temporary ones such as offsetting will work in practice. It may be the case that ground water abstraction sources identified by Natural England (e.g. Harham/Pulborough) are no longer required sooner than 2030; causing the removal of adverse impacts on protected habitats. Changes could happen quickly removing the major constraint on housing and there would no longer be any reason why growth should be limited within Horsham District

¹ Which it is often called in the Councils' evidence base (under reference SA597)

² Comprising circa 11,419 sq.m of office space, 3,000 sq.m of light industrial, 7,255 sq.m of retail floorspace and a hotel

³ Extensive representations on behalf of Our Place were submitted to both the Regulation 18 and 19 versions of the draft Plan (ref [SD13.1198209](#))



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as a result of water neutrality. The Local Plan should plan for this eventuality with flexible policies and triggers for an immediate Local Plan review.

2.1.2 *Matter 8:* The consequential significant shortfall in planned housing which fails to meet the OAN, as required by national planning policy (with a shortfall of 2,275 homes over the plan period), and recognised shortfalls in neighbouring authorities which will only add to acute housing crisis cited in the new Government's 30 July 2024 Written Ministerial Statement.

2.1.3 *Matter 2:* The legal defects, lack of rigour and unsoundness in the site selection process which relied upon a limited update to the SA that did not fully consider the implications of water neutrality and relied upon inconsistent reasoning when considering Strategic sites, particularly the Adversane Site and fails to consider reasonable alternatives.

2.2 Even if any these important shortcomings can be overcome, the degree of uncertainty and scale of unmet housing growth cannot be ignored and the spatial strategy and overarching policies for growth and change are not justified, consistent with national policy nor positively prepared without significant modification (as outlined below).

2.3 The Adversane Site is ideally placed to respond to the shortcomings of the draft Local Plan:

- It can deliver 2,850 homes overall and therefore meet the 2,275 home shortfall (in the plan period) and contribute to meeting the needs of neighbouring authorities;
- It can deliver and exceed very high standards of water neutrality from commitments and/or infrastructure provision; and
- It would deliver a high quality sustainable development, which notwithstanding inconsistencies highlighted in the Our Place representations about the analysis and scoring, rated highly in the site selection process which also demonstrated that Kingswood is viable and deliverable during the plan period.