

**MATTER 2 -  
PLAN PERIOD, VISION,  
OBJECTIVES AND THE  
SPATIAL STRATEGY**

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**HORSHAM LOCAL  
PLAN EXAMINATION**

Horsham Golf and Fitness Village

Hearing Statement by Carter Jonas

On Behalf of Generator Group

November 2024

**Carter Jonas**



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## 1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Generator Group, the owner of the Horsham Golf & Fitness Village site. Generator Group has engaged in the Local Plan process to date and has sought to identify its concerns with the legal compliance and soundness of the draft Local Plan from the outset.
- 1.2 Generator Group supports, in-principle, the Plan-led system. In order for a Plan-led system to function it requires Local Plans to be not only legally compliant and sound, but for them also to be deliverable, proportionate and based on clear evidence.
- 1.3 The National Planning Policy Framework ('NPPF' or 'the Framework') confirms that Plans will be sound if they are positively prepared, justified, effective and consistent with national policy. For the reasons identified in the representations, which we will expand on, the Plan accords with none of these requirements.
- 1.4 The site extends to 55.57 hectares and is currently home to Horsham Golf Club, with an 18-hole course, a 9-hole course, driving range, putting greens and short game area alongside a range other ancillary facilities including a cafe and gym. It lies adjacent to the Horsham Football Club and the access onto Worthing Road lies opposite the Horsham Park & Ride, recycling centre and petrol filling station.
- 1.5 An outline planning application for the development of the site for a Sports and Leisure Hub including the provision of communal facilities, nursery and up to 800 dwellings was refused planning permission on 14 May 2024. An appeal against the decision was recently lodged and the public inquiry is anticipated to be held in Q1 2025.
- 1.6 Generator Group has submitted duly made representations to each stage of the Local Plan production process. For clarity, this has included representations to:
  - The consultation on the Local Plan Review – Issues and Options – Employment, Tourism and Sustainable Rural Development in April 2018;
  - The consultation on the Site Selection Criteria in June 2019;
  - The Draft Local Plan (Reg 18), including the Interim Sustainability Appraisal for Strategic Sites and Growth Options and the Site Assessment Report, in February 2020; and
  - The Draft Local Plan (Reg 19) in March 2024.
- 1.7 This Hearing Statement expands on the issues identified within the representations regarding the Councils' failures in relation to the Sustainability Appraisal. It also identifies the failures of the site assessment process in relation to the Horsham Golf & Leisure site in relation to matters of procedural fairness.
- 1.8 It is not possible for these fundamental matters to be resolved and therefore the Plan is incapable of being taken forward to adoption.
- 1.9 In the event the Plan is taken forward, the effects of the decision for the local community would be intolerable and would have a serious deleterious effect on the social, economic and environmental future of Horsham. Whilst it would effectively result in a short-term Plan vacuum this can be remedied in the short-term through the production of a deliverable Plan that meets its identified needs, and addresses wider unmet needs, in a fair and proportionate manner.

## 2.0 MATTER 2 – PLAN PERIOD, VISION, OBJECTIVES AND THE SPATIAL STRATEGY

### 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?**

2.1 No comments

**Question 2. Is Strategic Policy 1: Sustainable Development sound? a) Should this policy or its justification have a greater emphasis on reducing the need to travel by private motorised transport?**

2.2 We do not consider that draft Strategic Policy 1 as currently worded is sufficiently effective and robust to secure a sustainable pattern to development in so far as achieve the Visions and Objectives within the draft Local Plan. For Strategic Policy 1 to be sound, it should be set in the context of other policies, such as Horsham District's Climate Action Strategy (**SS05**), which sets out various overarching goals to support the decarbonisation of the District, including:

- Active Travel: To reduce the reliance on private cars by improving walking and cycling infrastructure,
- Micromobility Solutions: To encourage a modal shift in Horsham District prioritising low carbon, active, and public forms of transport.
- Public Transport: To increase the attractiveness and demand for public transport in Horsham District in urban and rural areas.

2.3 To be consistent with the Vision and Spatial Strategy, it is our view that Strategic Policy 1 and other draft policies should direct development to the most sustainable locations within the District, especially where this would provide alternative travel options to help reduce reliance on the car and support a modal shift in the way people live and work.

2.4 The Council should also be seeking further allocations in sustainable locations along the edge of top order settlements, particularly those within close proximity to existing sustainable transport links, including SA754.

2.5 As highlighted in our Representations, SA754 is located within the strategic proximity to two top order settlements at Horsham and Southwater, and benefits from good sustainable transport options, including bus links and an existing public transport hub along Worthing Road, which provides access to other key services in Horsham town and Southwater.

2.6 Alongside this, the development of the site is proposed to deliver significant enhancements to the sustainable transport network, including improved connections to the Park & Ride, improvements for walking and cycling and significant improvements to the walking route to Southwater, which would encourage modal shift, reduce travel by cars and in the long run contribute to the sustainable pattern of development as envisaged within Strategic Policy 1. The failure to consider the wider impacts of the Council's strategy is an indication that Strategic Policy 1 is insufficiently robust to have been an effective tool during the preparation of the local plan.

**Question 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”?**

- 2.7 On point (a), Strategic Policy 2 is supported by evidence base documents, including Settlement Sustainability Review and Appendix 2: Full Set of Sustainability Data (**EN07**). However, despite its recent update, **EN07** is solely reliant on the data from Census 2011 and therefore is unlikely to be positively prepared and sufficiently robust to reflect demographic changes.
- 2.8 For example, Southwater has experienced a significant population growth by 31% since 2011 to 11,412 residents in 2021, compared to 5% growth for Horsham Town over the same period. Notwithstanding this significant demographic changes, Southwater is currently categorised alongside other slower-growing settlements within the ‘Small Towns and Larger Villages’ category of the development hierarchy. Thus, we consider that further updates to evidence base work, alongside potential changes to the allocation strategy, would be required for the Plan to be sound. More sustainable and fast-growing settlements should be reclassified into a higher band on the settlement hierarchy. If further new tiers are introduced into the settlement hierarchy, further changes to the allocation strategy, distribution of housing figures within Strategic Policy 37 and associated changes within the SA, should be reconsidered.
- 2.9 On point (d), it is our concern that Strategic Policy 2 and the associated built-up area boundaries fail to provide a degree of flexibility in relation to the suitability for developments that are located adjacent to each settlement, in particular those higher-order settlements, with benefits from good public transport links.
- 2.10 We contend that sustainable and accessible sites located adjacent to existing settlement boundaries, represent the most reliable sources of growth for the Plan period. It is noteworthy that some of the draft allocations are the current allocated sites within the adopted Development Plan. In light of the potential risk of delays in delivery at strategic locations, and the slow delivery of some allocated sites, the strategy should ensure sufficient flexibility to secure further developments in sustainable locations across the District over the Plan period.
- 2.11 With a significant demographic in some higher-order settlements, such as Southwater, and the chronic housing shortfalls, it is our view that Strategic Policy 2 should be reworded to allow for development proposals ‘within the built-up area’ and also on ‘land well-related to the built-up area’.

**Question 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?**

- 2.12 Strategic Policy 3 will impose an overly restrictive control over the development outside of the built-up area boundaries and therefore fails to promote sustainable development set out in the NPPF. The policy only supports development outside of the built-up area boundaries if it has already been allocated within a Local Plan or Neighbourhood Plan and adjoins the built-up area boundaries, alongside other five assessment criteria. It is our view that the Policy will be overly prescriptive to preclude any developments on unallocated sites outside settlement boundaries over the plan period despite its intermediary to existing settlements.
- 2.13 We are aware of paragraph 009 of the PPG that states:  
*“A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness”* (Reference ID: 67-009-20190722)
- 2.14 With the above in mind, we consider that Strategic Policy 3 is not legally compliant with the PPG requirements.

**Question 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?**

- 2.15 We support that Strategic Policies 2 and 3 could be more specific in terms of the amount of housing land to be provided within each settlement over the period, in accordance to the population size of each settlement. However, in order to be robust and effective, this needs to be supported by further robust evidence base work have been undertaken within **EN07** to reflect the recent trend of demographic changes.
- 2.16 We also maintain that, given the Council’s acute housing shortfalls and its failure to demonstrate a sufficient housing land supply over the years, flexibility should be given to this settlement-level housing figures in a way that they should be considered as a floor rather than an unnecessary caps on further housing growths.



