



Local Plan Examination

Horsham District Local Plan 2023-2040

Hearing Statement

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

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1 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?

1.1 Q3 - Is Strategic Policy 2: Development Hierarchy sound?

Since the draft local plan was published consent has been granted on appeal for development to the west of Broadbridge Heath at both Lower Broadbridge Farm (proposed site allocation HA7 of the draft plan, application reference DC/22/1052) and Wellcross Farm (application DC/19/1897). It is understood that the later has been lawfully commenced through the construction of the access. These sites extend the effective built-up area of Broadbridge Heath and the build-up area boundary should be extended to include them. Failure to do so would mean that any future development within these sites would stand to be assessed as development within the countryside, which would be contradictory and unnecessarily constraining given they will have become part of the urban area.

As suggested by the inspector's question, the policy is not consistent with other policies of the plan which are intended in specific circumstances to permit development outside of settlement boundaries.

An example is Policy 42: Retirement Housing and Specialist Care. Part 1 a of the policy allows the potential for development *within or adjoining defined built-up areas*. Part 2 provides criteria by which development may exceptionally be permitted away from rural settlements in lieu of sites within or adjoining a built-up area boundary. These potential exemptions are justified, particularly in light of the failure of the draft plan to identify specific sites and proposals to meet this particular need.

Policy 2 should be amended to allow for development outside of the build-up area boundaries of towns and villages where allowed-for by other policies of the plan in order to be found sound.

1.2 Q4 - Is Strategic Policy 3: Settlement Expansion sound?

As with Policy 2, Policy 3 cuts across other policies of the plan which make specific allowance for development outside of settlement boundaries such as Policy 42: Retirement Housing and Specialist Care. Policy 3 could be applied to as to prevent development otherwise allowed-for by Policy 42, and to avoid this should be amended to state that where other policies set out criteria for specific forms of development outside settlement boundaries the criteria of Policy 3 do not apply.

Criterion 1 of the policy could be unduly onerous in requiring development to *adjoin an existing settlement edge* given that existing natural features may separate sites from the settlement boundary as drawn on the proposals map without negating the ability of the site to relate well to the settlement. The policy could helpfully provide for a more qualitative assessment as to the relationship of sites to settlements.

The first part of criterion 3 requiring that development is demonstrated to meet identified local needs is unnecessary and contradictory given that criterion 2 already requires that expansion is appropriate to the scale and function of the settlement type.

The requirement in criterion 5 that development is contained within an *existing* defensible boundary is unnecessarily restrictive insofar as it incorrectly assumes that all settlements currently have and should in the future have a relationship with their setting which is one of physical and/or visual containment and it has no regard to the potential for new landscape features to be introduced which would assist in providing an appropriate and locally characteristic setting. The requirement that *the landscape and*

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townscape character features are maintained and enhanced assumes that all such features are positive and of equal importance and does not allow for positive change. Other policies of the plan already require that development should relate appropriately to its setting and maintain and enhance landscape value, so that criterion 5 could be omitted.

Criterion 6 represents unnecessary duplication.

The policy therefore requires the above-mentioned changes to be made in order for it to be found sound.

