Project	Land East of Ashington, West Sussex
Document	Horsham District Council Local Plan 2023-2040
	Matter 2 Hearing Statement - Welbeck Strategic Land IV LLP



## Matter 2 - Plan Period, Vision, Objectives and the Spatial Strategy - Hearing Statement

## Matter 2, 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?

Q2. Paragraph 1.2 of the Plan says the Plan considers a longer term context up to 30 years for strategic scale development. Which specific parts or policies of the Plan specifically considers this longer term context e.g. the "Strategic Site Allocations" and is the Plan effective in this regard?

There is little or no consideration of longer term context other than mention (paragraph 4.4) that some strategic allocations in the plan will build out beyond the plan period (to 2040). It is considered that the text at paragraph 1.2 is misleading as there is no consideration given to growth beyond 2040. Furthermore, other significant strategic considerations such as meeting the needs of the south of the District and the unmet needs of Coastal West Sussex are ignored.

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

Q1. Is the vision clearly articulated? Is the relationship between the vision and objectives clear? Are the Plan's vision and objectives soundly based? How do they relate to the longer term context set out in paragraph 1.2 of the Plan?

The Vision addresses the two main housing market areas at 3.11; the Northern West Sussex Housing Market area and the Sussex coast housing market area although focuses on the Northern area throughout the Plan.

There is little or no consideration of longer term context other than mention (paragraph 4.4) that some strategic allocations in the plan will build out beyond the plan period (to 2040). It is considered that the text at paragraph 1.2 is misleading as there is no consideration given to growth beyond 2040. Furthermore, other significant strategic considerations such as meeting the needs of the south of the District and the unmet needs of Coastal West Sussex are ignored.

Q3. 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?

The objectives only appear to recognise the role that 'Tier 2' Small Towns and Larger Villages play outside of the main Town of Horsham whereas the role of Medium Villages should be better acknowledged in the spatial objectives.

Despite being included within the 'Medium Villages' 'Tier 3', Ashington is considered to be a sustainable settlement with optimal access and existing road infrastructure off the A24. The settlement has a wide range of services and facilities which includes a primary school, two convenience stores, post office, pharmacy and a wide range of business. There is a regular bus service that passes through Ashington, which provides a link from Crawley to Worthing and other nearby settlements including Storrington and Horsham.



The Land East of Ashington site currently has excellent access and existing road infrastructure off the A24 at Ashington with a roundabout to the east of the A24 junction providing a link between the access road into the site and the slip roads to the adjacent A24. It has excellent walking and cycling connections to the village and surrounding areas. The site area is some 24.81 hectares (61.31 acres) and encompasses existing industrial land and premises which are accessed via the A24 roundabout and access road, plus and a variety of fields and paddocks. The existing East Wolves Industrial Estate and various surrounding business units are located here and include a number of local companies such as Carbank, Cissburys Car Dealership, AD Williams (Worthing) Accident Repair Centre and Renapur cleaning and care products.

It is not considered that the role of Medium Villages, particularly Ashington and associated transport infrastructure, and services and facilities, are recognised in the Spatial Objectives or the Plan as a whole.

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?

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?

In our view, the plan relies too heavily on delivery of larger strategic sites and fails to allocated sufficient housing within 'Small Towns and Larger Villages/ Medium Villages'. The spatial strategy fails to support proportionate growth at these key settlements for which the constraint of water neutrality could be addressed in the shorter term on bespoke basis without the need to rely on SNOWS, addressing the under delivery in the early period of the plan.

Q3. Is Strategic Policy 2: Development Hierarchy sound? a) Are the settlement types described justified and effective?

Strategic Policy 2 is not considered sound as it does not effectively plan for the needs of the District as a whole. The settlements types are too generic and exclude Medium Villages which can support more significant levels of growth. It is not considered that the role of Medium Villages, particularly Ashington with its associated transport infrastructure, and services and facilities, are recognised in Strategic Policy 2 or the Plan as a whole.

Q4. Is Strategic Policy 3: Settlement Expansion sound?

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?

Strategic Policy 3 is not considered sound as it does not effectively plan for the needs of the District as a whole. The Plan as a whole does not meet its housing or employment needs and therefore Policy 2 should be more flexible in facilitating sustainable development and the expansion of settlements where justified.

Bullet point 1. Should be amended as follows:

1. The site is allocated in the Local Plan or in a Neighbourhood Plan and/**or** adjoins an existing settlement edge;



c) Does this policy apply to all settlement types identified in Strategic Policy 2?

With the above adjustment to policy criterion 1. The policy can more fairly apply to all settlement types within Strategic Policy 2.

d) Is it clear how a decision maker should react to the term "defensible boundary"?

The term 'defensible boundary' is not clear and requires greater elaboration by the local authority. The glossary definition is brief and overly simplified to refer to streams, roads or hedgerows.

Q5. 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?

In our view, setting out a specific quantum of development in terms of policies 2 and 3 would further highlight the failure to direct sufficient proportionate growth to appropriate size settlements, such as Ashington. Setting out clear development goals based on the scale of the settlement and associated services and facilities would inevitably lead to greater certainty and ultimately increased delivery of suitable sites at the most sustainable settlements. It would also provide greater certainty in respect of assessing windfall development.