

Client	Welbeck Strategic Land IV – Bucks Green Rudgwick		
Project	Horsham Local Plan		
Document	Hearing Statement – Matter 2	Revision	A
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Matter 2 – Plan Period, Vision, Objectives and the Spatial Strategy

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?

Q1. 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?

The plan in its current form falls significantly short in terms of meeting the housing needs of the district. It is therefore not justified, effective or consistent with national policy and is considered unsound. This is explored further in our representations to the Regulation 19 Public Consultation exercise and within this statement in our responses to the relevant issues and questions.

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 Plan’s vision for Horsham notes at paragraph 3.23 that new housing will help “*contribute towards the Government’s housing growth aspirations*” and will “*meet the needs of the District’s residents, and if it is possible, contribute towards the provision of unmet needs from other authorities.*”

Further, Table 1 on page 18 / 19 which lists the spatial objectives for Horsham, notes at item 10 that it will “*Provide a range of housing developments across the District that: deliver the target number of new homes; respect the scale of existing places; and deliver a range of housing sizes and types to meet the needs of young people, families and older people and provide of a range of affordable housing.*”

The spatial objective and the vision refer to a position where the plan provides enough housing to meet the needs of existing and future residents over a 15-year period, in addition to contributing toward unmet need in other authority areas. The Council will only be able to achieve this if it seeks to provide enough housing to meet its Objectively Assessed Housing Need (OAN), which under the existing standard method is 15,487 homes across the plan period. Further, it will need to contribute toward the provision of unmet need in neighbouring authorities.

The submission plan falls significantly short of meeting its OAN, proposing to deliver only 13,212 over the period at an average rate of 777 homes per year. Further, it currently proposes to make **no contribution** no meeting the needs of other nearby authorities (such as Crawley or those on the Sussex coast). It is therefore not possible for the Submission Plan to achieve its vision and spatial strategy as it relates to housing provision.

The under delivery of housing as proposed by the plan would not “*deliver the social, economic and environmental needs of Horsham District*”, or consider “*the extent to which needs beyond our boundaries can be met*” and therefore does not relate to the longer term context of Para 1.2. Additionally, proposing to significantly under deliver housing does not set a viable framework for the preparation of neighbourhood plans.

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

Q4. Is Strategic Policy 3: Settlement Expansion sound?

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

Strategic Policy 3 requires development to be “contained within an existing defensible boundary”. The term is defined in the glossary as a stream, road or hedgerow.

This requirement is not consistent with the currently proposed allocation of site RD1, Land North of Guildford Road, which Welbeck Land are promoting for development through the plan process. The site was proposed for allocation in the Regulation 18 plan with its northern boundary defined by an existing post and rail fence. The site area is reduced in the submission version of the plan with the northern boundary now drawn arbitrarily across the existing field.

The proposed allocation is not therefore contiguous with any existing feature, whether man made (such as the fence) or a stream, road or hedgerow defined in the glossary.

Welbeck supports the allocation of the site, though considers the quantum of development can be increased (please see our response to Matter 8 and 9 and our previous consultation responses for further information). However, it is not currently clear how the Council’s proposed boundary for the site allocation (Policy HA14) is consistent with the requirements of Policy 3 in terms of the defensible boundary.

We consider the following changes are needed to the plan:

1. Restore the boundary to that shown in the Regulation 18 plan; and
2. Update the definition of the defensible boundary to include other man-made features such as fences.