



Homes
England

Horsham District Local Plan 2023-2040 Examination in Public

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

Hearing Statement

Date: November 2024



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?

1. Introduction

- 1.1. This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site HA2 in the Horsham Local Plan 2023-2040.
- 1.2. This statement supplements Homes England's previous representations to the Horsham District Local Plan Regulation 19 consultation. Where relevant separate submissions will be made in relation to Homes England's other land interests.

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?

- 1.3. Overall, yes the Plan is coherent in providing strategic policies that facilitate the delivery of required development over the 15-year period. There are, however, some minor suggestions or changes that Homes England recommend to enhance the soundness of the plan in this regard.
- 1.4. Firstly, Strategic Policy 2 Development Hierarchy does not account for the delivery of the West of Ifield strategic development. There may, therefore, be a potential gap in the development hierarchy in the later years of the plan as the new settlement becomes established. We would, therefore, recommend a modification to the hierarchy to include the West of Ifield site or, at the very least, acknowledge Crawley and its surrounds.
- 1.5. Strategic Policy HA2 looks ahead over a minimum of 15 years from adoption as required by paragraph 22 of the NPPF. Paragraph 1 of the policy states that Land West of Ifield is allocated as a comprehensive new neighbourhood to deliver the necessary infrastructure, services and facilities to meet the longer-term development of approximately 3,000 homes, of which it is anticipated at least 1,600 will be delivered in the period to 2040.

- 1.6. There is a realistic prospect that the site allocation can be delivered in full over the Local Plan period, therefore, the identified delivery of a minimum of 1,600 homes at the site is considered to be effective and sound. This is supported by the Draft Local Plan Housing Trajectory (document H08).
- 1.7. To ensure that the site allocation can be delivered during and beyond the draft Local Plan period and to provide sufficient flexibility to adapt to market changes over this time, Homes England consider that some amendments to Strategic Policy HA2 are required in order for the policy to be more effective and sound.
- 1.8. In order for the site allocation to be effective in addressing housing needs over the Local Plan period, and beyond, and be consistent with the evidence base, it is necessary for additional supporting text for Policy HA2 to clarify expectations and to include a more flexible, site-specific approach to the housing mix, rather than following the district-wide approach. We, therefore, welcome and support the proposed modification (HM063) which identifies a blended housing mix on the West of Ifield development to take account of both Horsham's and Crawley's needs.
- 1.9. In principle, Homes England support a minimum of 40% affordable housing within the site allocation however there needs to be sufficient justification for applying a site-specific affordable housing required to the site and clarification should be provided as to how this should be considered when taking account of unmet needs from Crawley. This would need to be fully tested as part of a viability assessment, and the rationale and justification for increasing the affordable housing provision needs to be clarified in order to support overall delivery.
- 1.10. In addition, to be able to meet identified local need and be informed by market evidence, an Economic and Employment Strategy should inform appropriate employment uses within the site allocation. Paragraph 2d of Strategic Policy HA2 specifically references B2/B8 uses for employment floorspace, however there should be flexibility in the types of employment land uses so that the allocation can adapt to market changes over the 15-year plan period. This amendment would make the policy more robust and, therefore, effective and justified.
- 1.11. Overall, it is evident that Strategic Policies in the Plan do look ahead over a 15 year period from adoption of the Local Plan, however Homes England have suggested amendments to ensure a more justified and effective policy consistent with national policy in the longer term context up to 30 years as responded to in question 2 below.

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?

- 1.12. Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements in infrastructure. While a minimum, the NPPF does not stop the Plan considering the longer term requirements and potential opportunities where it is sensible to do so, enabling consideration to be given to these as part of delivery over the Plan period.
- 1.13. Furthermore, where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 1.14. Considering, longer-term implications of policies is particularly important for Horsham District given its specific challenges. For example, the water neutrality restrictions applied to are following the September 2021 Position Statement from Natural England¹, has meant significant short, medium and long-term challenges in enabling the delivery of much needed housing whilst meeting water neutrality requirements. Furthermore, the nature of Crawley’s tight administrative boundary means that it is unable to meet its own housing needs, leading to unmet housing need across the Housing Market Area (HMA) that requires long-term strategic planning. Finally, the future of Gatwick Airport remains unresolved and the strategic importance of the Gatwick Diamond area as a major employment centre justifies a longer-term strategic approach to plan-making.
- 1.15. In regard to the allocation HA2, Land West of Ifield is stated to be available and deliverable and has been assessed as a highly sustainable location for development. Policy HA2 has therefore allocated approximately 3,000 homes to the site, of which it is envisaged approximately 1,600 homes would be delivered during the plan period. The housing trajectory within document H08 identifies an anticipated rate of delivery of 160 homes per annum on the site, meaning that housing delivery would continue for a further nine years beyond the stated plan period.
- 1.16. The Policy allocation clearly sets out the longer term vision for the site beyond the plan period as encouraged by Paragraph 22 of the NPPF, identifying the longer term

¹ Natural England’s Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach

delivery aspirations for the site for all of the proposed uses. Framing, the allocation within a longer term vision is important and ensures that opportunities for securing the effective delivery and maximising benefits from the allocation are achieved and which may otherwise be lost by focusing on delivery during the Plan period and specific policy requirements in HA2 that may otherwise not be justified, nor support wider strategic growth and investment opportunities across the sub-region. For example, requiring the site to secure and deliver a multi-modal sustainable travel corridor, consideration of cross boundary development needs and futureproofing an oversized secondary school site would all fail to meet the relevant tests of soundness within the NPPF without a clear vision within the Plan that extends beyond the Plan period. The approach is therefore consistent with national policy and ensures that the Plan is effective.

- 1.17. The question is, then, whether the plan could further strengthen the longer-term vision for the area.
- 1.18. Paragraph 4.19 – 2.21 seek to articulate the longer-term vision for the plan but it does not really achieve this objective. The text highlights the long-term challenges that the District faces in delivering its housing needs and the unmet needs of its neighbours (chiefly CBC). It does not, though, set out a vision for how this could be addressed, for example, it could here identify longer-term growth opportunities around the broader West of Ifield location as a possible way of meeting CBC's unmet needs.
- 1.19. Paragraph 10.84, in the supporting text to Strategic Policy HA2, acknowledges an area of land that has been promoted to Horsham District Council located around the western edge of Crawley, from Faygate in the south west to Gatwick in the north east as having a longer term potential for up to 10,000 homes. The plan states that at this stage, the longer term housing needs of Crawley, Horsham and wider sub-regions are unknown, and at the time of writing there remain significant uncertainties regarding both water neutrality and the outcome of the DCO proposals to expand Gatwick. The supporting text explicitly states that the deliverability of a 10,000 home development on this site in the period beyond 2040 cannot be demonstrated at this time.
- 1.20. It is noted that Crawley Borough Council (CBC) have previously indicated a request for the HDC plan to identify this land as a broad location to establish the long-term potential impacts and infrastructure requirements such a development would have. It is our position that this is not necessary for the current plan to be sound in the context of Paragraph 22 and that such a proposal would require greater deliverability testing and scrutiny than is currently being proposed. The plan broadly strikes the right balance in this regard setting out the 30-year vision for the delivery of the HA2 allocation in full whilst noting with the sub-text the potential for future growth in this location subject to future local plan testing.

- 1.21. Paragraph 10.87 of Policy HA2 states that in the longer term, the role of the location in meeting unmet needs for Horsham and Crawley will need to be revisited as part of future Local Plan review, once clearer timescales for alternative water supplies and water offsetting are known. Paragraph 10.88 states that once completed, development to the West of Ifield will form part of the wider urban form of Crawley and states that any development which takes place at this location will require close and ongoing discussions with Crawley Borough Council.

- 1.22. It has been established that West of Ifield development has a clear relationship with Crawley and that over the Local Plan period or as part of a review there is likely to be the opportunity to meet unmet housing needs from Crawley. It is therefore important that the draft Local Plan is clear about how land to the West of Ifield should be planned to meet wider strategic housing needs, including unmet needs from CBC. The longer-term vision of the Plan could be strengthened in this regard identifying how future growth in this area (including strategic infrastructure) could be considered to make the plan more effective in this regard.

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

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

- 3.1. Land West of Ifield is allocated in the Horsham District Local Plan as a comprehensive new neighbourhood. The geographical location of the site and proximity to Horsham District's boundary means that West of Ifield can make a significant contribution to the housing, infrastructure needs and economic priorities of both Horsham and Crawley.
- 3.2. Strategic Policy 2 defines the settlement hierarchy and identifies Horsham to be the most sustainable settlement within the district in terms of its ability to accommodate additional growth and development. The supporting text (paragraph 4.29) acknowledges that proposals for the expansion of Crawley, on land within the Horsham District administrative boundary, were submitted to the Council as part of preparation of the plan. The settlement hierarchy and Policy 2 would be more effective if it were to include land adjoining Crawley within the settlement hierarchy to acknowledge the regional role Crawley has in providing local employment, services and facilities.
- 3.3. Crawley's omission from the settlement hierarchy means that it would not be accounted for within subsequent Strategy Policy 3 which looks at the general criteria for settlement expansions. If Crawley is not acknowledged or defined as a "settlement" in the hierarchy then there is an unhelpful ambiguity about proposals on its boundaries.
- 3.4. Furthermore, Table 3 in Strategic Policy 2 setting out the settlement hierarchy also omits any reference in the hierarchy Land West of Ifield will sit and what it will be

assessed against. The Policy does not, therefore sufficiently address the status West of Ifield will have in the latter years of the plan.

- 3.5. Paragraph 5.18 of Topic Paper 1: The Spatial Strategy September 2024 (HDC02) identifies that a distinction has been drawn between urban extensions and stand-alone new settlements with extensions generally performing better overall given their level of access to existing jobs, services and facilities. In particular, delivering new large-scale development at these locations can provide access to jobs, services and facilities where existing residents could easily get to them and would help to limit the need for residents to travel longer distances. Therefore, the findings from the Topic Paper strengthens the need to reference Crawley in the settlement hierarchy.
- 3.6. Overall, Policy 2 should be amended to reference the status of Crawley and the West of Ifield development within the settlement hierarchy in order for the strategic policy to be sufficiently effective.