

**Examination Statement
Matter 2, Plan Period, Vision, Objectives and the
Spatial Strategy**

Horsham District Local Plan

Representations on behalf of Taylor Wimpey
(Ref 1211284)

22 November 2024

Lucid
Planning

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1. Introduction

- 1.1 This Statement has been prepared by Lucid Planning on behalf of our clients, Taylor Wimpey (TW), who have an interest in the land to the east of Henfield (SHELAA Ref SA693). This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 Representations have been made on behalf of our Client throughout the production of the emerging Local Plan and these representations expand upon earlier representations. While efforts have been made not to duplicate the content of previous representations, this Statement draws on previous responses where necessary.
- 1.3 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 These representations respond to the Inspectors' MIQs but do not respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.5 These representations have been considered in the context of the relevant NPPF that the District Plan is being examined under - NPPF September 2023 - and tests of 'soundness' as set out at paragraph 35 of that NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2. Response to Matter 2 – Plan Period, Vision, Objectives & the Spatial Strategy

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?

2.1 The Horsham Local Plan has been drafted on the premise that water neutrality limits the ability of the Plan, within the plan period up to 2040, to meet its own housing need, as well not being able to help meet its neighbour’s substantial unmet housing need. TW is a member of the HBF and support the HBF’s view regarding water neutrality that it is primarily an issue for the water companies and Environment Agency to ensure there is sufficient water supply to meet the needs of development whilst ensuring that there is no additional harm to the SAC and the wider environment from abstraction. Whilst it is recognised it is the responsibility of the LPA to ensure that there is no additional harm to the SAC, TW does not consider it to be the responsibility of the development industry to ensure neutrality through reduced standards and a payment to ensure offsetting. It is not for the developer either to anticipate those or to have to remedy this. The issue of water supply when considering planning applications is not a land use planning matter but one to be resolved by the water company in conjunction with the relevant statutory agencies.

2.2 Notwithstanding this, TW addresses the issues raised in the Horsham Local Plan evidence as it relates to the tests of soundness of the Plan.

2.3 TW supports the overarching vision and spatial objectives set out by the Council but considers some of the strategic policies do not facilitate achieving these.

2.4 Paragraph 1.2 of the Submission Plan states that the new Local Plan will cover the period from 2023 to 2040 but considers a longer term context of up to 30 years for strategic scale development. Paragraph 1.7 then goes on to state,

“This Plan has been positively prepared in accordance with National Policy and Guidance to deliver the needs of the District and, where possible, the wider area beyond our boundary.”

2.5 Paragraph 2.9 then states that the Plan has been prepared to be water neutral so that it does not deliver development which continues to harm the Arun Valley. Water neutrality is defined as development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels.

2.6 Paragraph 3.13 states,

“It is recognised that the District must consider the extent to which it can continue to meet housing and other development needs for both its own population and those in districts and boroughs who have unmet development needs. The constraints of water neutrality in particular generate environmental and practical limits to the level of growth which can be accommodated sustainably both now and in the future. This includes the need to ensure the timely delivery of sufficient new infrastructure that meets the needs of new development and ensuring there are benefits to existing as well as future communities.”

2.7 Paragraph 4.3 states,

*“The strategy has been tested through the sustainability appraisal process including the assessment of a range of alternative options for delivering growth and change in the District, taking account of the context of the requirement for water neutrality... **A key strand of the strategy is to ensure that the Plan also meets the Government’s agenda of delivering housing growth and the District’s wider Duty to Co-operate requirements, as far as is realistically possible.**”* (author’s emphasis)

2.8 Paragraph 4.5 recognises that the district has relatively few planning designations such as Green Belt or SSSIs and paragraph 4.6 recognises that in addition to the district forming part of the Gatwick Diamond and its functional links to the wider Northern West Sussex (encompassing both Crawley Borough and Mid Sussex District), there are also linkages to the south coast conurbation, particularly from the southern parts of the District, including Henfield. But due to the legal requirements placed on the Council through the Habitats Regulations 2017, which require clear demonstration that development which takes place will not have an adverse effect on the Arun Valley, there is now a requirement for water neutrality across the district. Paragraph 10.4 states that the Government’s standard methodology calculation for Horsham district in 2023 is 911 dwellings per annum or 15,487 homes in the 17 year plan period 2023-2040.

2.9 Paragraph 10.21 states, however, that the Council’s evidence base work has identified a total of 13,212 homes which are considered to be deliverable, equating to 777 new homes a year (including a 10% buffer for the first five years of the Plan period). This is 2,275 fewer homes than what is required to meet Horsham’s housing needs. As reported at the Mid Sussex Local Plan Examination by HDC officers, this unmet need has risen to 2377 new homes.

2.10 Paragraph 10.22 states that within the plan period, 6,717 homes already have planning permission or have been allocated in a ‘made’ Neighbourhood Plan. The allocated sites that are still in the planning application process, however, may or may not be able to achieve water neutrality, due to individual site circumstances, so the lack of certainty applies equally to some or all of these sites. This lack of delivery, in itself does not mean the Local Plan cannot plan for HDC’s housing need, as there will be 15 years post adoption to accommodate the whole of the Horsham housing need, if it were planned for properly and positively.

Unmet Housing Need of Neighbouring Authorities

2.11 Paragraph 4.8 of the Plan sets out that the starting point is to seek to meet the district’s own housing and other development needs as far as possible, within the constraints of water neutrality. Then, consideration was given to what extent the Plan could assist in providing for the unmet needs of the following neighbouring authorities:

- a) NW Sussex (Crawley)
- b) Coastal West Sussex (Worthing)
- c) Surrey Green Belt/other authorities (Mole Valley).

2.12 As acknowledged at the recent Mid Sussex Local Plan Examination, however, there is substantial unmet need in the neighbouring authorities:

- Crawley BC gave evidence to set out its unmet need of 7505 homes to 2040
- Brighton and Hove CC has an unmet need “of no lower than 1000 dwellings per year”
- The Coastal West Sussex authorities (which include Brighton and Hove) submitted evidence stating an unmet need of 30,000 homes up to 2050.

2.13 As the Inspector at Mid Sussex stated these are not just numbers; these are families without homes. Using these figures, and adding the unmet

need specified by HDC, that equates to c100,000 people that will not be provided homes. It should be noted that these figures do not address the Government's proposed new standard methodology figures, which without exception, increase the required number of homes in each authority.

- 2.14 As set out in the Hearing Statement on Matter 1, Duty to Cooperate, TW is concerned that the Council has not looked to maximise the effectiveness of plan making, particularly when considering the substantial - and growing - unmet housing need of the Coastal West Sussex authorities. Not addressing at least some of this unmet need will only exacerbate the housing crisis in this part of the south east making it more difficult for local people to afford a home that meets their needs.
- 2.15 In 2021, the Council produced a local plan, prior to the need for water neutrality, that not only met its own housing needs in full but went above its standard methodology and proposed a 'balanced' annual housing figure of 1,100 dpa. It would not have been enough to assist in meeting its neighbours unmet need in a significant way, but it did indicate that in HDC's own opinion, providing for that number of dwellings is sustainable and that the potential adverse impacts were not significantly and demonstrably outweighed by the benefit of meeting needs in full. Further, HDC's build rate has exceeded this figure in 2015/16 (1,201); 2017/18 (1,125) and 2018/19 (1,369) showing it is possible. The only issue with regard to adverse impacts is in relation to the Arun Valley SAC, an issue that the Council say can be resolved on the basis of the proposed mitigation strategy. If these impacts are resolved, then the assumption must be that there is no justification for not meeting housing needs in full and meeting at least some unmet need of its neighbours.
- 2.16 Disappointingly, no solutions have been presented with regard to these unmet needs by Horsham or its neighbours as part of the Duty to Cooperate. In fact, it is notable that whilst there is significant correspondence between authorities stating that they cannot meet the

needs of others due to water neutrality, the evidence base on this issue failed to even consider these needs as part of the mitigation strategy. This would suggest that this strategic issue was not given the necessary weight or considered at the right time/in the correct sequence when preparing this local plan.

- 2.17 For co-operation to be effective, and for solutions to be found, Councils need to actively try and address the issue at hand. At present there appears to be an acceptance that housing needs will not be met and that the act of writing to other authorities is sufficient for the duty to be met. No active engagement appears to have been undertaken to try and resolve this particular issue and in effect consideration of unmet housing needs has become a tick box exercise. For engagement to be constructive it needs to move beyond writing to each other and actively engage in identifying solutions.

Increasing Lack of Affordability

- 2.18 As set out in the green box on page 127 of the Plan, the median house price in Horsham District is already around 13 times higher than average annual earnings. The cost of private renting also remains high. This creates a high demand for affordable market and housing association housing.
- 2.19 As most affordable housing is provided through market housing sites (whether that is First Time buyers or housing association housing), not meeting the need of the district is further causing a problem for more vulnerable Horsham residents.
- 2.20 The Submission Plan sets out at Strategic Policy 39: Affordable Housing, a requirement of 45% for greenfield sites. This is high considering all the other requirements on development, including water neutrality, but this need will only be exacerbated by prolonged under provision, particularly

in such a strategically important authority area in the Gatwick Diamond and with heavily constrained neighbouring authorities.

- 2.21 As set out in Hearing Statements on Matter 1, Duty to Cooperate and the Sustainability Appraisal and Matter 8, Housing, TW does not consider that HDC has approached the preparation of the Local Plan positively, effectively or that it is justified.
- 2.22 The Council has used the issue of water neutrality to suppress the provision of new homes in the district over the local plan period to 2040. The NPPF (paragraph 23) states that “*Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address **objectively assessed needs** over the plan period*”. It is possible for HDC to provide for its full housing need within the time period remaining, as the Plan will have a minimum 15 year period from adoption, as required by the NPPF. The Council’s stepped trajectory can accommodate this early shortfall.
- 2.23 HDC has not addressed the substantial unmet need of its neighbouring authorities, but worse, it has actually exacerbated the housing crisis by generating an unmet need of its own of 2377 new homes. This is a fundamental flaw in the soundness of the HDC Plan, as the Plan cannot be considered to be positively prepared, justified, effective or consistent with national policy as a result.
- 2.24 This level of unmet need is not acceptable. Knowing this extraordinary issue is most likely going to getting worse with the Government’s increased housing requirements, it is only right and proper that HDC – as a minimum - plan properly for the whole of its own need for the whole of the local plan period – and not kick the issue into the long grass of the next local plan review.

2.25 In order for the vision to be considered to be positively prepared, justified, effective or consistent with national policy. The Plan (and SA) must:

- **fully consider reasonable alternatives that cover the Council’s full housing need for the Plan period up to 2040, as a minimum**
- **fully consider how that need could be brought forward within the Local Plan either by allocating more sites and/or providing a criteria-based policy to allow alternative water neutrality mitigation other than SNOWS, because other mitigation solutions are available now**
- **fully consider policies to provide for developable sites or broad locations of growth for the latter part of the plan period when water neutrality mitigation may not be required.**

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?

2.26 In order to meet the tests of soundness, new homes need to be located in sustainable locations, close to where the demand arises in order to maintain social networks, minimise the need to travel and support the economy.

2.27 It is important to consider the relationship of settlements to other towns and cities beyond the administrative boundary of Horsham when planning to meet neighbouring needs. In this regard, the HMAs acknowledge the strong relationship that Horsham District, and in particular the southern part of the district, has with the Coastal Sussex authorities.

- 2.28 Henfield is a Tier 2 Small Town and Large Village on the border of the NW Sussex and Coastal West Sussex HMAs. It has good relationships with key settlements on the south coast and is therefore ideally located to accommodate growth to support the neighbouring authority.
- 2.29 The HMAs illustrate that there is a key relationship between southern Horsham and the south coast authorities, and therefore Horsham District Council should be seeking to locate growth in the southern part of the district to accommodate the unmet needs in a sustainable way.
- 2.30 The above further demonstrates that people are travelling from the south coast to their places of work within Horsham. Therefore, by accommodating unmet need arising from authorities such as Worthing in the south of Horsham District, this could reduce travel distances and commuting times for work, whilst staying close to the coastal towns to maintain social networks. This would therefore provide economic, environmental, and social benefits for these residents.
- 2.31 With regards to where to locate development in the south of the District, in accordance with Paragraph 83 of the National Planning Policy Framework, in order to promote sustainable development in rural areas, housing should be located where it will enhance and maintain the vitality of rural communities. It sets out that:

“Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

- 2.32 Horsham should therefore seek to promote sustainable development through allocating housing in villages that are well related to the south coast authorities as well as Horsham, and where development will support their facilities and services.

- 2.33 In particular, the settlement of Henfield is beyond the South Downs National Park (SDNP) and is broadly unconstrained, thereby being suitable for growth, and benefits from direct, fast links to higher order settlements of Brighton, as well as to Horsham.
- 2.34 Henfield has a vibrant High Street with a diverse range of facilities including a post office with a banking facility, a chemist, a baker's shop, newsagent, supermarket (Sainsbury's neighbourhood hub), grocer's shop, optician, coffee shops and a few independent shops, supported by a range of community facilities. A mobile bank also visits the main car park on Thursdays. The range of services provided in Henfield together with the sustainable transport links to towns which provide further facilities, make Henfield a well located, sustainable settlement to help accommodate both Horsham's housing needs together with unmet need arising from the Brighton and East Sussex authorities.
- 2.35 By locating additional growth in Henfield, which has existing strong links to the south coast, this will ensure a range of homes are available for those wanting to stay near their social and employment networks whilst being able to find homes.
- 2.36 This would also help address the significant imbalance of proposed allocations north and south of the A272, as set out in paragraph 2.38 below.

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?

2.37 TW acknowledges the historic bias towards the north of the district in terms of housing allocations, primarily due to the influence of Gatwick Airport on Crawley and the NW Sussex HMA. However, given the substantial unmet need in the Coastal West Sussex HMA of 30,000 homes up to 2050, which will only increase, TW would have expected to see a more balanced spatial strategy in this Plan, even with the suppressed housing numbers being proposed.

2.38 HDC has known about this unmet housing need for some time, as in 2020 both HDC and Mid Sussex DC joined the Coastal West Sussex & Greater Brighton Planning Board to try and address these needs. The Reg 18 Plan also acknowledged a very small proportion of the need by proposing to allocate 2000 towards Worthing's unmet need. Although inadequate, it at least showed recognition of issue. However, since water neutrality has become an issue HDC has used that problem to not only remove assistance to neighbouring authorities but also add to the problem by not planning for its own need in its entirety; creating an additional unmet need of 2377 homes (as stated at the Mid Sussex Examination).

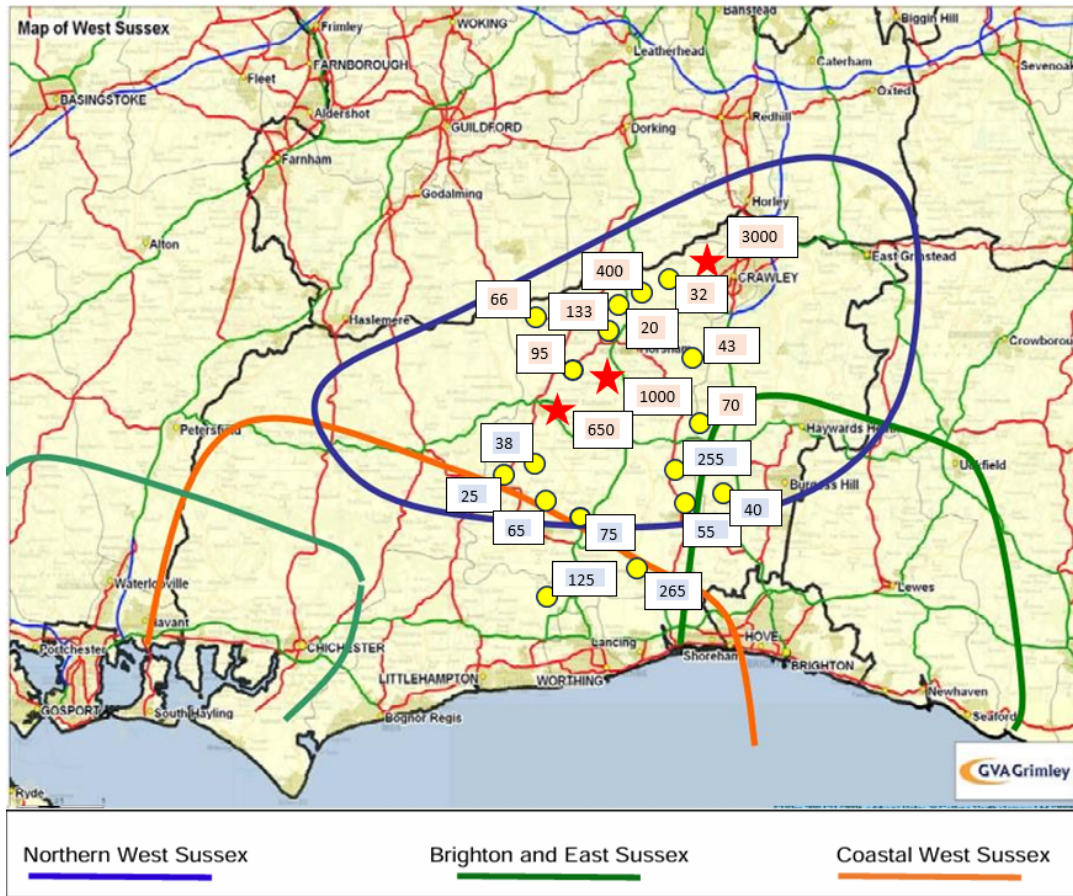
2.39 As it is, however, and using the A272 as a crude divide, the current spatial strategy looks like this:

| | Proposed Site Allocations in Submission Plan |
|--|---|
| North of A272 (sites shown in pink in diagram below) | 5499 new homes (including all 3 strategic sites) |
| South of A272 (sites shown in blue in diagram below) | 943 new homes |

2.40 It is noted that the list of allocations also includes four strategic allocations at Rusper (32 dwellings), Small Dole (80 dwellings), Thakeham (65 dwellings) and Lower Beeding (43 dwellings) which are Tier 4 “Smaller Villages”. It is interesting to note that two of these lower tier settlements have been allocated more housing than Henfield (55 dwellings) which is a higher order, Tier 2 settlement.

2.41 Also Ifield, shown as a Tier 5 very small village, is proposed to be extended by 1600 extension to Crawley.

2.42 This spatial split not only dismisses the needs of residents in the southern part of Horsham district, but also the south coast authorities and the needs of the Coastal West Sussex and Brighton and East Sussex HMAs, which are predominantly to the south of the A272, as illustrated on the plan overleaf.



2.43 It is imperative that Horsham, as a relatively unconstrained district with excellent transport links to the south coast and with settlements with a functional relationship to those on the south coast, should accommodate an appropriate proportion of the needs within its Local Plan. Furthermore, by accommodating such homes in Horsham district, there would be great opportunity to provide a range of type and sizes of homes (such as family housing) that provide for those who work on the south coast but cannot find suitable or desired accommodation.

Variety of Site Size & Opportunity to Improve 5 Year Land Supply

2.44 Further, as can be seen from the table below, the Council seems to have allocated either large sites e.g. the three main strategic sites (650 at Billingshurst, 1000 at Southwater and 1600 at Ifield within the plan period) plus the intensification of Horsham by 500 dwellings, or smaller sites ranging from 6 to 265 new homes in Tier 2, 3 or 4 settlements.

| | Proposed Site Allocation Size in Submission Plan |
|--|---|
| North of A272 (sites shown in pink in diagram above) | 6 to 133 new homes |
| South of A272 (sites shown in blue in diagram above) | 25 to 265 new homes |

- 2.45 There are no allocations in the mid-range of 300-600 new homes. It should be recognised that sites can be delivered to assist Horsham and neighbouring authorities meet their housing need at Tier 2 and 3 settlements, but in order to do so, a larger scale of development is required to enable bespoke on-site water neutrality solutions, which would normally fit within this mid-range, thereby also providing a wider variety of deliverable sites. This fits into Paragraph 83 of the NPPF (as set out in paragraph 2.35 of these representations) and the general view that in order to achieve – and sustain – a 5 year housing land supply, a variety of site sizes are required.
- 2.46 This strategy would not only assist Horsham reduce its 2,377 deficit of new homes, but if located in Henfield, a Tier 2 settlement, they would be supporting the housing need in the Brighton and East Sussex HMA, support Henfield’s services and facilities and not rely on a strategic water neutrality solution.
- 2.47 Development at Henfield would also contribute to the 5 year housing land supply as TW control the land to the north and Croudace control land to the south with both parcels capable of being brought forward expeditiously. Enhanced pre-application advice on water neutrality mitigation has been sought from the Environment Agency and Natural England by TW on the northern parcel. The Environment Agency has confirmed that the proposal for peak over threshold harvesting could be

acceptable and that there is water availability in the catchment to accommodate the scheme. It has confirmed they are satisfied that the proposals are a suitable solution for avoiding an adverse effect on the integrity of the Arun Valley protected sites.

2.48 If the Council discussed such sites with developers or provided a policy structure in the local plan for such sites, then it may be possible for Horsham to meet its own housing need and assist its neighbouring authorities, have a more balanced spatial strategy as well as supporting individual settlements and providing much needed affordable new homes.

2.49 In order for the spatial strategy to be considered to be positively prepared, justified, effective or consistent with national policy. The Plan must:

- **fully consider allocating mid range sized sites – particularly within the range of 300-600 with water neutrality solutions in the south of the district - to enable the Council to meet its full housing need for the Plan period up to 2040, as a minimum, and serve its residents more fairly in this part of the district and the wider HMA**
- **fully consider how that need could also be brought forward within the Local Plan by providing a criteria-based policy to allow alternative water neutrality mitigation other than SNOWS, because other mitigation solutions are available now**
- **fully consider policies to provide for developable sites or broad locations of growth for the latter part of the plan period when water neutrality mitigation may not be required.**

Q3. Is Strategic Policy 2: Development Hierarchy sound?

a) Are the settlement types described justified and effective?

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”?

2.50 The development hierarchy defines settlements based on their characteristics and function. Whilst this approach is logical in principle, the Submission Local Plan appears to suggest only limited development is appropriate in medium and smaller towns and villages. Supporting text to the policy at paragraph 4.31 of the Submission Local Plan states:

“Medium and smaller towns and villages have the potential to address identified local needs. Limited development to meet these needs and support rural services and infrastructure will be supported, subject to local character being retained and any environmental constraints.”

2.51 As HDC is not meeting its own housing need, and the fact there is a substantial unmet need in neighbouring authorities which is creating a local housing crisis, TW considers that the Plan should allow for more sustainable development in key locations to serve its residents where a water neutrality solution can be provided.

2.52 With previous allocations still being developed and further significant allocations at its main settlements, it is time for HDC to take a more proactive and positive approach to development at mid-tier settlements. The Council’s housing needs, and that of the wider HMAs, can be met by allocating more sites and providing a positive policy structure now to allow for water neutrality mitigation solutions in addition to SNOWS, rather than delaying to a local plan review.

2.53 As set out in Strategic Policy 2, Small Towns and Larger Villages are “*settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements or each other to meet some of their own requirements.*”

2.54 Allocating development or having areas of search for larger scale development at Small Towns and Large Villages such as Henfield that are close and well connected to higher order settlements within and outside Horsham district would assist in the provision of much needed new housing for the District, and wider HMA, in sustainable locations. Medium sized developments, such as that being proposed by TW at Henfield, can be appropriate whilst maintaining or enhancing the character of the settlement, as well as providing new and existing residents with better links, active travel options, open space provision for all residents and an on-site bespoke water neutrality solution.

2.55 As demonstrated in previous representations and promotion material, the Site at Henfield has the flexibility to deliver a range of development options involving:

- About 400 homes on the TW land on its own or up to 850 homes in combination with the land to the south. Alternatively, development of the whole site could be considered in phases, the first of which embraces the westernmost fields (about 500 homes) followed by about 350 homes on the second phase. Depending upon the development scenario adopted, scope exists to offer a range of community benefits, including :
 - Provision of a new community facility, including a modernised hall to support the local scouts or nursery groups.
 - Potential for a long stay car park, located with good pedestrian connections into Henfield centre, reducing pressure of parking on the high street and surrounding residential roads.

- New green spaces, including sports pitches, a MUGA, allotments and multifunctional green space to support healthy lifestyles and provide opportunity for ecological enhancements and biodiversity net gain.
- Enhanced woodland planting around the Sewage Treatment Works, with potential for a community orchard in the northern part of the site. This would provide ecological, landscape, social and environmental benefit to both existing and future residents of Henfield.
- A network of new and upgraded footpaths and cycleways which will interlink the green spaces and the existing facilities and services in Henfield, reducing reliance on other settlements and the private car.
- Provision of a riverside walk.

2.56 In accordance with paragraph 83 of the National Planning Policy Framework, in order to promote sustainable development in rural areas, housing should be located where it will enhance and maintain the vitality of rural communities. Paragraph 83 sets out that:

‘Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’

2.57 Horsham should therefore seek to promote sustainable development through allocating housing in settlements that are well related to the south coast authorities as well as Horsham, and where development will support their facilities and services such as the Site at Henfield.

2.58 For these reasons, this Site should be allocated in the Local Plan as a strategic housing site to assist Horsham meet its housing need and help rebalance the spatial strategy.

2.59 **Strategic Policy 2 therefore fails all four soundness tests as it is not positively prepared, justified, effective or consistent with national policy. The approach to housing allocations at differing tiers of the**

development hierarchy must be reassessed to ensure it is an appropriate strategy for the district and potentially to assist in meeting the unmet needs from neighbouring authorities where it is practical to do so, and sustainable development is achieved in accordance with the NPPF.

Q4. 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?

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?

2.60 Strategic Policy 3 sets out how the growth of existing settlements across the District will continue to be supported in order to meet identified local housing, employment, and community needs.

2.61 As written, the Site promoted by TW at Henfield is assessed below against the specified criteria of Strategic Policy 3 as set out below:

| | Strategic Policy 3 Criteria | The Proposed Site |
|----------|---|--|
| 1 | The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge; | <ul style="list-style-type: none"> • The Site abuts the eastern settlement edge of Henfield. |
| 2 | The level of expansion is appropriate to the scale and function of the settlement type; | <ul style="list-style-type: none"> • Henfield is a Tier 2 settlement 'smaller towns and larger villages' with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. |

| | | |
|---|---|--|
| | | <ul style="list-style-type: none"> The Site would provide a mid-size development with associated community services, facilities and infrastructure appropriate to the scale and function of the settlement. |
| 3 | The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services; | <ul style="list-style-type: none"> The Site would contribute to the District's unmet housing 2,377 new homes The provision of additional homes would increase the number of residents that use the local shops, services and facilities within Henfield itself which will support businesses to remain open in the long term. A new, multi-functional community hall, and a variety of formal and informal green spaces would be provided on site and benefit new and existing residents alike. |
| 4 | The impact of the development individually or cumulatively does not prejudice comprehensive long-term development, in order not to conflict with the development strategy; | <ul style="list-style-type: none"> A comprehensive allocation like that proposed at Henfield will ensure the provision of facilities, services and infrastructure resulting in a sustainable settlement expansion in accordance with the overarching vision, objectives and spatial strategy of the Local Plan. A series of smaller, piecemeal allocations coming forward over multiple Local Plan periods are more likely to prejudice the long-term development strategy as it is unlikely smaller allocations will meet the threshold to provide comprehensive services, facilities and active travel measures. An allocation could support improvements to the existing public transport network thereby helping reduce reliance on vehicular travel. |
| 5 | The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced; and | <ul style="list-style-type: none"> The existing hedgerow boundaries and woodland provide a logical and defensible boundary to the east of the site whilst the existing Sewage Treatment Works provide a defensible boundary to the north. |
| 6 | The development can conclusively demonstrate that it is water neutral in accordance with other development plan policies. | <ul style="list-style-type: none"> The Site at Henfield includes an onsite water neutrality measure ensuring the development would be water neutral. See paragraph 2.47 above. |

2.58 That being said, HDC is not meeting its own housing need, and there is a substantial unmet need in neighbouring authorities which is creating a

local housing crisis, TW considers that the Plan should positively plan for more sustainable development in key locations to serve its residents, where a water neutrality solution can be provided, as set out above in response to Matter 2, Issue 3, Q3.

- 2.59 To be positively prepared effective and justified, TW suggests the following amendments to Strategic Policy 3, predicated on Strategic Policy 37: Housing Provision being amended to make provision for the full OAN of 15487 dwellings, as a minimum, and that the Plan should be read as a whole and avoid repetition (deleted text):

Suggested Revised Strategic Policy 3: Settlement Expansion

The growth of existing settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of existing settlements will be supported where all of the following criteria are met:

1. ~~The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;~~
2. The level of expansion is appropriate to the scale and function of the settlement type, **taking into account the land take, critical development mass and financial viability requirements to operate an acceptable water neutrality mitigation solution;**
3. The development is demonstrated to meet the identified local housing needs **set out in this plan** and/or employment needs or will assist the retention and enhancement of community facilities and services;
4. ~~The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy;~~
5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced; and
6. ~~The development can conclusively demonstrate that it is water neutral in accordance with other development plan policies.~~