

Horsham District Local Plan Examination
Hearing Statement for Matter 5 on behalf of
A2Dominion

September 2026

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1. Introduction

- 1.1 This Statement is submitted on behalf of A2 Dominion (hereafter referred to as 'A2D') to the Horsham Local Plan Examination in response to 'Matter 5: The Spatial Strategy and Site Selection' set out in the Inspector's Hearing Agenda Weeks 2 and 3 October Hearings document (IDJB07 – 7th September 2026).
- 1.2 This statement should be read in conjunction with the other statements submitted on behalf of A2D, and their representations to consultations on the draft Local Plan.

2. Response to Matter 5: The Spatial Strategy and site selection

I. Spatial distribution: whether the plan's proposed distribution of development is an appropriate spatial response to:

- housing need in the District and in adjacent districts
- the settlement hierarchy and settlement character
- access to employment, social and community facilities and the objective of reducing the need to travel
- the highway network
- the rail network
- public transport and active travel

2.1 In responding to this issue, we note:

- MM28 amends paragraph 4.16 of the Plan to state (new text underlined) *"Land around Crawley has also been considered as a location for potential development, given the role of the town in driving the wider sub regional economy and providing employment opportunities, together with the potential for an allocation to help deliver unmet housing needs close to the location where they have arisen, and the potential to deliver a school that meets existing and future educational needs including those within Crawley Borough."*
- Via MM138, the Plan is proposed to be amended to make provision for 221 dwellings per annum (3,757 in total) to help address unmet need arising from Crawley Borough; and
- MM138 explains how the 'primary location' for those needs being met is the allocation of land West of Ifield, but the remaining unmet need will be accommodated across the Northwest Sussex Housing Market Area.

2.2 The Council, and the Inspector, will be aware that a key aspect of A2Dominion's engagement with the preparation of this Local Plan has been that, due to the functional relationship between Horsham District and Crawley Borough the area plays a critical role and should help to address these unmet needs. However, a further aspect of A2Dominion's engagement with this Plan has been that, in the event it does make provision for unmet needs from Crawley, it should do so close to where that need arises. The unmet need arising from Crawley is not simply a shortfall to the Local Housing Need, but masks a greater issue being the significant unmet need for affordable housing. There are clear socio-economic reasons why unmet needs, particularly for affordable housing should be addressed close to where they arise in order to minimise travel to work, as well as to maintain community cohesion.

The Role of Crawley

- 2.3 Whilst the District does contain towns of its own, Crawley has a much broader function as a settlement of sub-regional importance. Crawley also has very significant unmet housing needs.

- 2.4 The Spatial Strategy Topic Paper (HDC02) states at paragraph 5.9 that:

“At this high level, the SA process made some broad assumptions around the implications of large amounts of development in particular locations (e.g. potential impacts on flood risk, biodiversity, infrastructure and community cohesion). Other broad principles were applied, for example the strong economic relationship between Horsham District, Crawley and the Gatwick Diamond area; and that failure to provide some level of growth related to Crawley and Gatwick may fail to best respond to problems both of out-commuting and of unmet housing needs in this area in particular.”

- 2.5 The supporting evidence recognises the strong economic and social relationship between Horsham District, Crawley and the wider Gatwick Diamond area. In particular, the Council's Spatial Strategy Topic Paper acknowledges that failure to provide growth related to Crawley and Gatwick may fail to respond appropriately to both out-commuting patterns and unmet housing needs. In addition, we note that paragraph 3.4 of the submission Local Plan states *“60% of the residents of Horsham District live and work within the District, with 40% commuting beyond the District boundaries. Many of these people are employed locally in Crawley and Mid Sussex”*.

- 2.6 Crawley is not only significant to this Local Plan because of its role as a sub-regional economic hub and because it has a significant unmet housing need (and even greater unmet affordable housing need), but because the Local Plan itself recognises how many residents of the District are employed in Crawley itself.

- 2.7 It is therefore a component of the evidence base to this examination that there is a strong economic relationship between Horsham District and Crawley and that by not properly providing growth related to Crawley and Gatwick, the plan may fail to respond to important considerations.

- 2.8 That relationship works in both directions: unmet need is generated from within Crawley, resulting in a need to accommodate growth beyond its boundaries; Crawley draws in people from the surrounding area for work, and to access its broad range of services and facilities.

The Local Plan Response to the Role of Crawley

- 2.9 The Plan's proposed spatial distribution of development is not fully justified because it fails to give sufficient weight to the role of Crawley as a major sub-regional centre and to the functional relationship between Horsham District and Crawley. Whilst Crawley lies outside the administrative boundary of Horsham District, this does not diminish its significance in shaping travel patterns, employment opportunities, service provision and housing needs across the northern part of the District.

- 2.10 The spatial distribution proposed by the Plan does not appear to have fully reflected these relationships when determining the most sustainable locations for growth.
- 2.11 The distribution of development should be assessed not only against Horsham District's housing needs, but also against the well-documented housing pressures arising from neighbouring authorities, most notably Crawley which performs a strategic role within the sub-region yet faces severe constraints to accommodating its housing needs.
- 2.12 Strategic Policy 2 (Development Hierarchy) of the submission Local Plan makes no reference to Crawley. Similarly, there are no references, in any form of spatial strategy policy, regarding the importance of Crawley.
- 2.13 The Plan makes provision for 3,757 homes unmet need arising from Crawley (50% total unmet need) by virtue of MM138. There is a strong planning rationale for directing such unmet need to sustainable locations that are closely related to Crawley. Such locations are capable of helping to address housing needs arising from the wider housing market area whilst also supporting the economic function of Crawley and the Gatwick Diamond. The Plan does not adequately explain why opportunities in locations related to Crawley have not been pursued more positively as part of the overall spatial distribution.
- 2.14 The Council now appears to recognise (MM28) the importance of addressing unmet needs close to where they arise, but, it does not go far enough. The Council now (via MM192) anticipates that at least 2,500 dwellings will be delivered from the West of Ifield site to 2040 with that being the primary location through which Crawley's needs are addressed. The extent to which 2,500 can be delivered will need to be examined, but irrespective, this still leaves more than 1,200 dwellings where the Council has not embraced the principle that it seeks to embed in the Plan via MM28 regarding meeting needs where they arise.
- 2.15 It is unhelpful that the Plan is not supported by any form of updated spatial strategy topic paper. This means that no analysis appears to have been undertaken as to the manner in which potential sites can, or cannot, help to address Crawley's unmet need. Yet it is apparent from the text which the Council (rightly) seeks to include, that this is an important point.
- 2.16 In the latest Site Assessment Report Update (June 2026) (HDCJB14b) there are references to Crawley, but it is notable that the discussion regarding the Adversane site now proposed for allocation records how it is "*relatively distant from the main employment settlements of Horsham and Crawley*". The only site identified in that document as having the potential to help address unmet needs from Crawley is the land West of Ifield.
- 2.17 Whilst the settlement hierarchy provides a useful framework for directing growth, it is concerned with settlements within the District's administrative boundaries. The hierarchy does not recognise Crawley's role as a higher-order centre providing a substantial concentration of employment, retail, leisure, education, health and community facilities which are regularly accessed by Horsham District residents.

- 2.18 As a consequence, the hierarchy risks underestimating the sustainability credentials of sites located adjacent to Crawley. The omission of Crawley from the strategy (and the consideration of options) means that the Plan has not fully assessed how development adjoining the borough could contribute positively meeting those needs in a full and proper manner.
- 2.19 The objective of reducing the need to travel is best achieved by locating development close to major concentrations of employment and services. Crawley is one of the most significant employment centres in the South East and provides a wide range of services and facilities which serve a catchment extending well beyond its administrative boundary.
- 2.20 Development in locations adjoining Crawley would enable future residents to access jobs, schools, healthcare, retail and leisure facilities without requiring longer-distance journeys. Such locations are therefore highly consistent with the objectives of sustainable development and represent an appropriate spatial response to the evidence of existing travel patterns.
- 2.21 By contrast, a greater reliance on locations further from major employment centres risks increasing the need for longer journeys and out-commuting, contrary to the objectives underpinning the spatial strategy.
- 2.22 The appropriateness of the spatial distribution should also be considered in the context of the strategic highway network. Locations related to Crawley benefit from existing connections to the strategic road network and are already integrated into established travel patterns associated with the wider Crawley and Gatwick economic area.
- 2.23 Development adjacent to Crawley is particularly well placed to benefit from existing and potential public transport connections, as well as opportunities for active travel. The close physical relationship between such sites and existing urban areas creates realistic opportunities for walking and cycling to jobs, schools, services and public transport interchanges.
- 2.24 These characteristics align closely with national and local objectives seeking to promote sustainable transport choices and reduce carbon emissions. In our view, the spatial distribution proposed by the Plan does not place sufficient emphasis on these advantages when compared with alternative locations.

The Internal Spatial Strategy ‘Tension’

- 2.25 Overall, the Plan's proposed distribution of development is not justified because it has not adequately responded to the strategic role of Crawley, its unmet housing needs, or the strong functional relationship that exists between Crawley and northern Horsham District. A spatial strategy which directs a greater proportion of Crawley's unmet need to sustainable locations associated with Crawley would align with the objectives of reducing the need to travel, supporting access to employment and services, making effective use of transport infrastructure, and responding to housing needs across the wider sub-region.

- 2.26 The proposed Main Modifications reveal a more fundamental issue with the way the Plan articulates its spatial strategy. It is welcomed that the Plan now makes provision for 3,757 dwellings to contribute towards meeting unmet needs arising from Crawley Borough. Through MM28 it recognises the importance of accommodating unmet needs close to where they arise and MM192 identifies the West of Ifield allocation as the 'primary' means through which that objective will be achieved.
- 2.27 These changes are significant because they elevate Crawley's housing needs from being a cross-boundary matter to becoming an explicit driver of the Plan's spatial distribution of development. The justification for the West of Ifield allocation is not founded principally upon its relationship with Ifield village (if it were, that would be inconsistent), nor upon its position within Horsham District's settlement hierarchy. Rather, it has always been influenced by its relationship with Crawley and now the Plan explicitly recognises the ability of that site to accommodate development close to where unmet housing needs arise.
- 2.28 The difficulty is that the settlement hierarchy and wider spatial strategy have not been amended to reflect this change in emphasis. Strategic Policy 2 continues to categorise settlements entirely by reference to the hierarchy within Horsham District. Crawley does not appear within that hierarchy, is not identified as a strategic influence on the distribution of growth, and plays no meaningful role in explaining why development has been directed to particular locations.
- 2.29 Consequently, there is now a disconnect between the strategy described by the Plan and the strategy actually being pursued through the allocations. The Plan explicitly relies upon a major allocation whose principal justification derives from its relationship with an adjoining authority area, yet the strategic framework against which growth is distributed proceeds as if that adjoining authority plays no material role in shaping development patterns.
- 2.30 The purpose of a spatial strategy is to explain why development is being directed to particular places and not others. Once the Council accepts that unmet needs from Crawley should be addressed within Horsham District, and that such needs should be met close to where they arise, Crawley becomes a strategic consideration that must influence site selection and the distribution of growth. The spatial strategy should therefore explain how locations related to Crawley have been assessed and how that consideration has informed the overall pattern of development.
- 2.31 Indeed, the Council's evidence indicates that this is precisely what has occurred in practice. The Site Assessment Report Update specifically identifies the West of Ifield allocation as having the capacity to address unmet needs arising from Crawley. However, this influence is not transparently reflected in the Local Plan, or its spatial strategy and is absent from the themes addressed in the broader evidence base.
- 2.32 There is a danger that the Plan presents a spatial strategy which is incomplete or inconsistent. A reader of Strategic Policy 2 would reasonably conclude that development has been distributed primarily by reference to the hierarchy of settlements within Horsham District. However, the Main Modifications demonstrate that a major component of the strategy is actually the accommodation of development associated with Crawley and the wider Crawley/Gatwick economic area.

- 2.33 The importance of this point extends beyond the West of Ifield allocation itself. Once the principle is accepted that housing needs arising from Crawley should be accommodated close to where they arise, that principle should logically inform the assessment of all reasonable alternatives. Yet no updated spatial strategy assessment has been produced which examines how competing sites perform against this objective. The Examination is therefore left without a clear explanation as to how this important consideration has influenced the comparative assessment of sites across the District.
- 2.34 In effect, the Plan appears to adopt two competing spatial narratives. The first is the traditional settlement hierarchy based upon the District's settlements. The second, introduced through the Main Modifications, is a strategy that seeks to respond to Crawley's housing needs, economic role and functional geography. Those two narratives are not inherently incompatible, but they have not been integrated into a coherent and transparent spatial strategy.
- 2.35 The result is that the Plan now allocates development on the edge of Crawley for reasons that can only properly be understood by reference to Crawley's strategic role, whilst simultaneously omitting Crawley from the policies that explain how growth is distributed. The Plan therefore risks being unjustified because the spatial strategy no longer accurately describes the factors that have driven the selection of sites and the distribution of development.
- 2.36 In our submission, the appropriate response is not to revisit the principle of providing development associated with Crawley. Rather, it is to ensure that the spatial strategy properly reflects the reality of the approach now being pursued. The strategy should expressly recognise (in policy) Crawley as a strategic economic and service centre which exerts a substantial influence on housing demand, commuting patterns and travel behaviour across northern Horsham District. It should further acknowledge that locations adjoining Crawley represent a distinct category of sustainable growth location capable of meeting needs close to where they arise.
- 2.37 In light of those concerns, we now explore the manner in which the Council's application of 'constraints' has been undertaken by looking through the wrong end of the telescope. In essence, the combination of a Plan which did not recognise that strategic role of Crawley, and wrongly applied national policy has artificially limited the manner in which it can properly respond to this critical strategic matter.

II. Constraints: whether the distribution of development is sound having regard to:

- **landscape and countryside**
- **heritage assets and their settings**
- **habitats and biodiversity**
- **flood risk and climate change mitigation**
- **services including water and sewerage**

- 2.38 Horsham District contains a number of important assets which must be properly understood to inform the spatial strategy. There is an important distinction between constraints *informing* the distribution of development and constraints *determining* the distribution of development.
- 2.39 The Council has approached this exercise through the wrong end of the telescope. Rather than first identifying the District's strategic development requirements and then assessing how those requirements might most sustainably be accommodated in line with matters that influence the spatial strategy, the assessment process treated particular designations as absolute constraints at the outset. These designations have artificially shaped and restricted the range of options available for consideration before the balancing exercise required by national policy has been undertaken and without reference to those spatial strategy considerations.
- 2.40 The concern is therefore not just that specific sites have been rejected but that the Council's methodology has artificially constrained the range of spatial responses capable of addressing identified housing needs, including cross-boundary housing needs. If constraints are treated as reasons to exclude broad areas from consideration, rather than factors to be weighed and mitigated where possible, the resulting spatial strategy may reflect the constraints mapping exercise more than a balanced assessment of sustainable development options.
- 2.41 This issue is particularly apparent in relation to land within the National Landscape. The Council's HELAA methodology (2018) indicated that sites falling within the designation would effectively be excluded from further consideration on that basis. That approach conflated the existence of a designation with a conclusion that development within it is inappropriate.
- 2.42 National policy does not establish such a presumption and whilst the National Landscape is unquestionably an important material consideration, it does not require land within the designation to be treated as unavailable for development. Rather, it requires a planning judgement which considers the significance of potential impacts, the need for development, alternative options and the extent to which effects can be avoided, reduced or mitigated. Alongside those matters, it is essential to properly understand the matters which influence the spatial strategy.
- 2.43 Once it is accepted that cross-boundary needs inform the spatial strategy (and that the location of sites to meet those needs is relevant), the assessment of alternatives should be sufficiently robust to demonstrate that potentially sustainable options have not been excluded through an overly restrictive interpretation of constraints.

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