

## **Position Statement of Horsham District Council**

### **Agenda Item 4**

#### **POLICY SNP1 (b) – BUILT UP AREA BOUNDARIES**

I shall wish to discuss the methodology and justification for the Built Up Area Boundaries Review, with reference to the Built-Up Area Review (February 2019) supporting document, in light of representations submitted by Savills (on behalf of Christ's Hospital Foundation) (Ref. No. 5), Batcheller Monkhouse (on behalf of Mr. Peter Westergaard) (Ref. No. 7), Gladman Developments Ltd. (Ref. No. 27), Berkeley Strategic Land Ltd. (Ref. No. 38) and Horsham District Council (Ref. No. 44).

#### **KEY DOCUMENTS for cross-reference:**

1. National Planning Policy Framework (2012)
2. Planning Practice Guidance (2020)
3. Horsham District Planning Framework (2015)
4. Report on the examination into Horsham District Planning Framework (2015)
5. Southwater Neighbourhood Development Plan (2019-2031) Submission Version
6. Housing Need Study, AECOM, 2018
7. Regulation 18 consultation version of the Horsham Local Plan Review (2020)
8. Built Up Area Review, Southwater Parish Council (2019)
9. Issues and Options – Employment, Tourism and Sustainable Rural Development, Horsham District Council (2018)

#### Representations submitted by:

- Savills (on behalf of Christ's Hospital Foundation) (Ref. No. 5)
- Batcheller Monkhouse (on behalf of Mr. Peter Westergaard) (Ref. No. 7),
- Gladman Developments Ltd. (Ref. No. 27)
- Berkeley Strategic Land Ltd. (Ref. No. 38)
- Horsham District Council (Ref. No. 44).

## **Introduction**

- 4.1 This Position Statement has been prepared by Horsham District Council (HDC) on the methodology and justification for the Built Up Area Boundaries (BUAB) in the Southwater Neighbourhood Development Plan (SNDP). The District Council considers designation of settlement boundaries is a strategic matter for the Local Plan Review.

## **Strategic objection**

- 4.2 Paragraph 21 of the National Planning Policy Framework (NPPF) requires plans to specify which policies are strategic, and this is done in the Horsham District Planning Framework (HDPF). The paragraph then goes on to say that strategic policies should address the strategic priorities for the area. The District Council considers that the BUAB is a strategic tool for policy planners to prevent urban sprawl and ribbon development and that it guides sustainable development to the right places. Those areas included within the BUAB must conform to relevant local and national policy to ensure the most appropriate use of land. Outside the boundary only uses appropriate to a countryside location are acceptable. Strategic Policy 4 of the HDPF deals with settlement expansion and sets out the context by which settlements can expand but does not allude to boundary changes.
- 4.3 There are a total of 24 neighbourhood development plans (NDP) in various stages of preparation across Horsham District, which are supported by the District Council. If every qualifying body were to undertake a boundary reviews through an NDP it would create inconsistencies and result in piecemeal development across the District. This would be impractical and lead to confusion especially with regards to appeals and public inquiries. Therefore, the District Council objects to any BUAB being set by a qualifying body including Southwater.
- 4.4 Horsham District Council published its methodology for the review of Built-up Area boundaries in the Issues and Options – Employment, Tourism and Sustainable Rural Development document published by the District Council in 2018. The same methodology has been used applied when considering comments and feedback to this consultation and has fed into the Horsham District Regulation 18 consultation document which has now been published for consultation and on which the Parish Council are invited to provide their feedback.
- 4.5 Although the Parish Council indicate that their review of the Southwater built-up area boundary follows the methodology published by Horsham District Council, the outcomes of the review do in a number of instances directly conflict with our own conclusions. Furthermore, we are aware that, although they sought further clarification on one matter, the Parish Council did not object to the District Council's Built-up area boundary proposals in their response to our 2018 Issues and Options – Employment, Tourism and Sustainable Rural Development consultation. Subsequent to this support a different approach has now been set out in the draft neighbourhood plan.
- 4.6 This provides evidence that consistent interpretation of our guidance is likely to be problematic. In the longer term such could prejudice growth proposed by the Local plan and thus prejudice the government's housing agenda to positively plan for the District. In any event, it should be noted that the BUAB for Southwater will be superseded by the BUAB set for the village in the Local Plan Review, although it is recognised that any final boundary will be subject to any conclusions reached by an Independent planning inspector.

## **Conclusion**

- 4.7 The District Council objects to the built-up area boundaries proposed by the Parish Council settlement boundary. This conflicts with Strategic Policy 4 of the HDPF and therefore fails the basic condition of not being in general conformity with the strategic policies of the development plan.