



Project	Land East of Ashington, West Sussex
Document	Horsham District Council Local Plan 2023-2040 Matter 1 Hearing Statement - Welbeck Strategic Land IV LLP

Matter 1 Legal and Procedural Requirements - Hearing Statement

Matter 1, Issue 1 – Whether the Council has complied with the duty to cooperate in the preparation of the Plan?

Q1. What are the strategic matters relevant to the preparation of the Plan (as defined by S33A(4) of the Planning and Compulsory Purchase Act 2004)?

Chapter 4 of the draft Local Plan and specifically paragraph 4.8 recognises the importance of meeting unmet needs from surrounding areas within Horsham for the long term and for both housing and economic growth. The strategy is however flawed as the evidence base and economic need policies do not properly consider the south of the District and meet unmet needs from the Coastal West Sussex Area, with the only functional economic area utilised in the draft Reg 19 plan relating to the North West Sussex (Gatwick Diamond) area.

Given the site's location, and its position on the strategic road network, it is capable of serving businesses both within Horsham District, as well as those in conurbations on the South Coast (along the stretch of coast from Brighton to Bognor Regis), and importantly can assist in meeting those authorities unmet employment needs

Under the draft Local Plan Policies for Growth and Change text at paragraph 4.8 the plan specifically states that:

'Consideration was then given as to what extent the unmet needs including housing and other strategic matters including infrastructure provision such as education. These discussions have taken account of the geographical relationship Horsham District has with the wider sub region, to establish how unmet needs from these areas can be most effectively met in the context of Horsham District, now or in the future, once a longer term solution to water resources is found. This will focus on prioritising consideration of meeting unmet needs with the strongest economic and housing links to the District as follows:

a) North West Sussex (Crawley)¹

b) Coastal West Sussex (Worthing)

c) Surrey Green Belt /other authorities (Mole Valley).'

In relation to later employment and economic need policies however the Coastal West Sussex Area is not considered, with the only functional economic area utilised in the draft Reg 19 plan relating to the North West Within Chapter 4 and paragraph 4.8, the Local Plan evidence base, economic strategy and policy approach for the Plan period is flawed. The draft Plan should more accurately assess and plan for the employment needs of the Coastal West Sussex area and the southern part of Horsham District by updating their evidence base accordingly.

A more complete assessment of the Coastal West Sussex area and the southern part of Horsham District alongside the Economic Growth Assessment Update (EGA) (January 2020) (covering the Northern West Sussex area) would facilitate a more balanced economic strategy and strategic policy approach.



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Q2. For each of these, who has the Council co-operated with during the preparation of the Plan, what form has this taken? What has been the outcome of this co-operation?

The Examination Library identifies that Horsham District Council has prepared Statements of Common Ground with only Arun District Council (ADC) and Brighton & Hove City Council (BHCC) of the authorities within the Coastal West Sussex Area.

The SoCG with Arun District Council states that neither authority can meet unmet housing needs of the other. The document is silent on employment.

The SoCG with Brighton & Hove City Council fails to agree an approach on meeting wider housing needs, with BHCC disagreeing that should Horsham be able to meet unmet needs that these would be prioritised from the Northern West Sussex Housing Market Area (HMA). Specifically in relation to employment, BHCC's requirements are unlikely to be fully accommodated within the city given constrained land availability and it was noted that Horsham District Local Plan *may offer the opportunity to make a positive contribution to the sustainable economic development of the wider sub-region*. Aside from agreement to work together moving forward there appears to be no action carried out on this issue.

No further consultation appears to have been carried out with other authorities within the Coastal West Sussex area such as Adur & Worthing or Chichester.

Q3. What substantial concerns have been raised in terms of compliance with the duty to co-operate?

In relation to later employment and economic need policies, the Coastal West Sussex Area is not considered, with the only functional economic area utilised in the draft Reg 19 plan relating to the North West HMA. Chapter 4 and paragraph 4.8, the Local Plan evidence base, economic strategy and policy approach for the Plan period is flawed. The draft Plan should more accurately assess and plan for the employment needs of the Coastal West Sussex area and the southern part of Horsham District by updating their evidence base accordingly.

A more complete assessment of the Coastal West Sussex area and the southern part of Horsham District alongside the Economic Growth Assessment Update (EGA) (January 2020) (covering the Northern West Sussex area) would facilitate a more balanced economic strategy and strategic policy approach.

The efforts to cooperate with all relevant strategic bodies on the sustainable development or use of land that has significant impacts have failed, particularly in relation to employment provision but also the allocation of housing.

Q4. How has the Council co-operated to establish and meet a housing need? How specifically have development constraints influenced that co-operation, particularly water neutrality?

Q5. In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Plan? Are the ongoing partnerships and joint working arrangements between all the relevant bodies accurately reflected in the Plan?



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In relation to employment and economic need policies, the Coastal West Sussex Area is not considered, with the only functional economic area utilised in the draft Reg 19 plan relating to the North West HMA. Chapter 4 and paragraph 4.8, the Local Plan evidence base, economic strategy and policy approach for the Plan period is flawed. The draft Plan should more accurately assess and plan for the employment needs of the Coastal West Sussex area and the southern part of Horsham District by updating their evidence base accordingly.

The draft Local Plan is unsound in that it does not sufficiently plan for future economic growth in the District, including meeting unmet needs of other authorities, particularly to the south of the District.

It is not considered that the ongoing partnerships and joint working arrangements between all the relevant bodies (as stated in the SoCGs with ADC and BHCC) are accurately reflected in the Plan at all. The Local Plan is not legally compliant, sound or compliant with the Duty to Cooperate.