

Horsham District Local Plan 2023-2040

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Examination Webpage:

<https://www.horsham.gov.uk/planning/local-plan/local-plan-examination>

14 October 2024

MATTERS, ISSUES AND QUESTIONS

Introduction

Following my initial review of the supporting evidence for and representations on the Horsham District Local Plan 2023-2040 (the Plan) I set out below my matters, issues and questions (MIQs) for the Examination hearing sessions.

When responding to the MIQs, please consider whether the Plan needs to be modified to take account of the National Planning Policy Framework September 2023¹ (NPPF), and if you think it does, please say why the Plan as submitted is unsound or not legally compliant and how you would wish it to be changed to make it sound or legally compliant. The tests of soundness are set out in paragraph 35 of the NPPF.

It is important to note that the MIQs have arisen from my initial assessment of the submission documents and representations, and may evolve through the Examination, not least following on from any responses the Council or others make on these matters prior to the hearing sessions.

These MIQs should be read alongside my Inspector Guidance Notes. I have also produced a Provisional Hearings Programme for the hearing sessions which are scheduled to take place at **Main Conference Room at: Horsham District Council**,

¹ In accordance with the transitional arrangements set out in paragraph 230 of the National Planning Policy Framework December 2023.

Parkside, Chart Way, Horsham, RH12 1RL commencing at 0930 on the 10 December 2024.

All those who wish to speak (participate) at the Hearing sessions should confirm this in writing with the Programme Officer by 1700 on Friday 01 November 2024. The deadline for receipt of written statements for ALL Matters to be considered at the hearing sessions is 1700 on Friday 22 November 2024. The deadline for Statements of Common Ground is 1700 on 11 November 2024.

Please, see my Inspector Guidance Notes and Provisional Hearings Programme for further information.

L Fleming

INSPECTOR

Matter 1 – Legal and Procedural Requirements

Matter 1, Issue 1 – Whether the Council has complied with the duty to co-operate 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)?
- 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?
- Q3. What substantial concerns have been raised in terms of compliance with the duty to co-operate?
- 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?

Matter 1, Issue 2 – Whether the Council has complied with other relevant procedural and legal requirements?

Plan Preparation

- Q1. Has the preparation of the Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?
- Q2. In overall terms, has the preparation of the Plan complied with the Statement of Community Involvement?

Sustainability Appraisal

- Q3. How has the Sustainability Appraisal (SA) informed the preparation of the Plan at each stage?
- Q4. Does the SA assess all reasonable alternative spatial strategy options, levels of housing and employment need and options relating to other policies in the Plan? Where it is considered that there are no reasonable alternatives, relating to all policies in the Plan is this clearly explained?
- Q5. Is the SA adequate and have the legal requirements of the 2004 Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 (2012 Regulations) been met?

Habitats Regulation Assessment

- Q6. Has the Habitats Regulations Assessment (HRA) been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017?
- Q7. How has the Plan responded to potential adverse effects on the Mens Special Area of Conservation? Are any specific main modifications needed to the Plan to reflect the latest evidence? What is the latest agreed position with Natural England on this matter?

Climate Change

- Q8. Does the Plan contribute to the mitigation, and adaptation to, climate change consistent with s19 of the Planning and Compulsory Purchase Act 2004 and paragraphs 152-158 of the NPPF? Does the Plan include policies in relation to the mitigation of and adaptation to climate change? Which Policies specifically?

Equality Impact Assessment

- Q9. Does the Equality Impact Assessment identify all relevant groups with protected characteristics? Have their needs been taken into account in preparing the Plan?

Neighbourhood Plans

- Q10. What are the relevant made Neighbourhood Plans and their plan periods? Are any other Neighbourhood Plans in preparation and when are these expected to be made?

Superseded Policies

- Q.11 Is the Plan clear in identifying the policies of the existing development plan which would be superseded by the Plan consistent with Regulation 8(5) of the 2012 Regulations? Are main modifications needed to address this?

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

Matter 2, 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?

- 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?
- 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?
- Q3. Is paragraph 2.12 consistent with the Levelling Up and Regeneration Act (2023) in relation to the South Downs National Park?
- Q4. Do the *Chapter 1: Introduction and Chapter 2 Planning Context* sections of the Plan adequately explain the role and relationship between the Plan and the Neighbourhood Plans (made or in preparation) in delivering the development required in the district?

Matter 2, 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?
- Q2. Objective 9 refers to "smaller market towns" – how does this relate to the settlement hierarchy set out in Strategic Policy 2?
- 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?

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?
- Q2. Is Strategic Policy 1: Sustainable Development sound?
a) Should this policy or its justification have a greater emphasis on reducing the need to travel by private motorised transport?
- Q3. Is Strategic Policy 2: Development Hierarchy sound?
a) Are the settlement types described justified and effective?

- b) Have all relevant settlements been identified and placed in the correct settlement type?
 - c) Have Air Quality Management Areas informed the classification of settlements into settlement types?
 - d) Are the built-up area boundaries and secondary settlement boundaries justified and effective?
 - 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?
 - 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”?
- 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?
- Q6. Should the role of Neighbourhood Plans be more clearly articulated in Strategic Policies 2 and 3 or their justification text in the interests of effectiveness?

Matter 2, Issue 4 – Whether the strategy and overarching policies for growth and change in Horsham Town and Broadbridge Heath are justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 4: Horsham Town sound?
- a) Is the relationship with the economic development policies clear?
 - b) Is the geographical application of this policy clear having regard to the town centre, north of the town, the allocations or locations within or outside the built up area boundary?
- Q2. Is Strategic Policy 5: Broadbridge Heath Quadrant sound?
- a) Is the relationship with the economic development policies clear? Is the threshold for retail impact assessment justified and is the policy robust with

regard to its approach to impact on Crawley Town Centre?

b) Is the geographical application of this policy clear?

c) Is it necessary to reference or strengthen the reference to specific development constraints such as those related to landscape, transport or the environment?

Matter 3 – Climate Change and Water

Matter 3, Issue 1 – Whether the approach to climate change and energy use, sustainable design and construction is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 6: Climate change sound?
- a) Is this policy consistent with national policy, justified and effective particularly when read alongside Building Regulations?
 - b) Does the justification accurately reference “net zero carbon”?
 - c) Is criterion 2 d) effective?
 - d) Is the reference to “sustainable transport infrastructure” effective and consistent with other policies in the Plan?
 - e) Does this policy appropriately deal with the demolition of buildings?
- Q2. Is Strategic Policy 7: Appropriate Energy Use sound?
- a) Is the cascade set out in criterion 1 justified and effective?
 - b) Is the order of preference set out in criterion 2 c) justified and effective? Should any other “means” be identified and are the “means” identified justified and effective?
 - c) Is the reference to energy from waste in the justification text justified?
- Q3. Is Strategic Policy 8: Sustainable Design and Construction sound?
- a) Is this policy consistent with national policy, justified and effective particularly when read alongside Building Regulations?
 - b) Is it consistent with national policy and legislation with regard to its approach to heritage assets?
 - c) Is it consistent with Strategic Policy 9: Water Neutrality?

Matter 3, Issue 2 – Whether the approach to water neutrality and flooding is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 9: Water Neutrality sound?
- a) Is the geographical application of this policy accurately identified on the submission Policies Map?
 - b) Is the restriction for residential development of 85 litres of mains supplied water per person per day justified and effective?
 - c) Is it clear how this policy would be applied to non-domestic buildings?
 - d) Is the approach to water off setting justified and effective? Has any further progress been made on implementing the Sussex North Offsetting Water Scheme? When realistically is it likely to be in place? Will it be effective?
 - e) Has achieving water neutrality been adequately assessed as part of the viability evidence and is this policy flexible enough to deal with changes in circumstances with regard to water neutrality?
- Q2. Is Strategic Policy 10: Flooding sound?
- a) Is the policy effective in terms of having regard to cumulative impacts?
 - b) Should it reference green and blue infrastructure?

Matter 4 – Conserving and Enhancing the Natural Environment

Matter 4, Issue 1 – Whether the approach to environmental protection and air quality is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 11: Environmental Protection sound?
- a) Is “minimise” in criterion 6 with regard to air pollution and emissions effective?
 - b) In criterion 3 should the environmental quality of water resources be maintained or improved or both?
 - c) Is the approach to the effect on the South Downs International Dark Sky Reserve Designation effective?
 - d) Is the geographical application of this policy accurately identified on the submission Policies Map?
- Q2. Is Strategic Policy 12: Air Quality sound?
- a) Is it necessary for proposals to take account of relevant guidance and other development plan policies?
 - b) Should this policy specifically reference the Air Quality Management Areas and does this policy or any parts of it have a geographical application which should be identified on the submission Policies Map?

Matter 4, Issue 2 – Whether the approach to the natural environment, biodiversity, landscape, coalescence, countryside, green and blue infrastructure and local green space is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 13: The Natural Environment and Landscape Character sound?
- a) Are the words “inappropriate development” in the opening paragraph effective?
 - b) Is “where practicable” in criterion 2 consistent with national policy?
- Q2. Is Strategic Policy 14: Countryside Protection sound?
- a) Should this policy make reference to its geographical application on the Policies Map?
- Q3. Is Strategic Policy 15: Settlement Coalescence sound?
- a) Does this policy apply to the whole District or just specific locations within it? Does it have a geographical application which should be identified on the submission Policies Map?
 - b) Is it clear what is meant by “development between settlements”?
 - c) Is there any conflict between this policy and others in the Plan which allocate sites for development?
- Q4. Is Strategic Policy 16: Protected Landscapes sound and legally compliant?
- a) Should this policy make reference to its geographical application on the Policies Map?

- Q5. Is Strategic Policy 17: Green Infrastructure and Biodiversity sound?
- a) Does “Green Infrastructure” mean “Green and Blue Infrastructure”? Are main modifications needed to address this?
 - b) Is the requirement for relevant development proposals to deliver at least a 12% biodiversity net gain justified and effective?
 - c) Are the requirements for off-site biodiversity net gain justified?
 - c) Is criterion 7 effective?
 - d) Is criterion 8 consistent with national policy and legislation?
- Q6. Is Policy 18: Local Green Space sound?
- a) Is the first sentence of the policy effective?
 - b) Is it clear how this policy will be applied? Does the policy have any implications for Local Green Space which is close to a development proposal?

Matter 5 – Development Quality, Design and Heritage

Matter 5, Issue 1 – Whether the approach to Development Quality, Design and Heritage is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 19: Development Quality sound?
- a) Should criterion 8 also reference setting?
 - b) Should the opportunities associated with strategic scale developments be recognised in this policy, particularly with regard to creating defensible boundaries?
 - c) Should any specific development constraints be identified that can significantly influence the design of any scheme such as the presence of utilities infrastructure or flooding?
- Q2. Is Strategic Policy 20: Development Principles sound?
- a) Is it necessary for effectiveness to reference reducing the need to travel?
- Q3. Is Policy 21: Heritage Assets and Managing Change within the Historic Environment sound and legally compliant?
- Q4. Is Policy 22: Shop Fronts and Advertisements sound and legally compliant?

Matter 6 – Infrastructure, Transport and Healthy Communities

Matter 6, Issue 1 – Whether the approach to Infrastructure Provision is legally compliant, justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 23: Infrastructure Provision sound?
- a) Does this policy apply to both development sites allocated in the Plan and other sites not identified in the Plan?
 - b) Is the relationship between this policy and the site specific infrastructure requirements identified for each site allocation clear?
 - c) Is this policy sufficiently flexible to deal with and respond to changing circumstances?
 - d) Would this policy potentially prevent development proposed in the Plan from being built as envisaged and if so how will this be addressed?
- Q2. Is Strategic Policy 24: Sustainable Transport sound?
- a) With reference to the relevant evidence, would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network (in terms of capacity and congestion), highway safety and habitats can be cost effectively mitigated to an acceptable degree?
 - b) Are the funding mechanisms and strategic transport improvements identified in paragraph 8.13 up to date and are they consistent with the schemes identified in the Infrastructure Delivery Plan?
 - c) What is the latest position with regard to when a “full” Crawley Western Multi Modal Corridor or sections of it is/are required to be completed to facilitate the development proposed in the Plan?
 - d) What is the latest position with regard to the impact of the Plan on the Great Daux roundabout?
 - e) Is the requirement for a bespoke-design space for home working justified and effective?
- Q3. Is Policy 25: Parking sound, particularly with regard to standards not detailed within the Plan?
- Q4. Is Policy 26: Gatwick Airport Safeguarding sound?
- a) Is it clear what constitutes minor development in criterion 2?
 - b) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project are main modifications needed to this policy, other policies in the Plan or the Plan’s evidence base to reflect this?
- Q5. Is Strategic Policy 27: Inclusive Communities, Health and Wellbeing sound?
- a) Is this policy effective when read alongside other policies in the Plan?
- Q6. Is Policy 28: Community Facilities, Leisure and Recreation sound?
- a) Does this policy apply only to land and buildings that are publicly accessible? Is this policy consistent with paragraph 99 of the NPPF?

Matter 7 – Economic Development

Matter 7, Issue 1 – Whether the approach to employment land and supply is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 29: New Employment sound?
- a) What is the overall employment land requirement (hectares and floorspace) over the plan period, is this justified and effective, and should this be more clearly specified in the Plan?
 - b) What is the total employment land supply (hectares and floorspace) over the plan period including sites allocated in the Plan, is this justified and effective and should this be more clearly specified in the Plan?
 - c) Are the overall employment land requirements and supply provided by the Plan justified and effective? What is the evidence that the employment supply will be delivered within the plan period and that the employment requirement will be met?
 - d) Is it clear whether proposals must meet all criterion 1-10? Is the detailed wording of each of these criteria effective?
 - e) Are allocations EM1-EM4 soundly based, with particular regard to the mix of uses and constraints identified?
 - f) Is the geographical application of this policy clear?
- Q2. Is Strategic Policy 30 Enhancing Existing Employment sound?
- a) The Policies Map identifies “Key Employment Areas” and “Sites for Employment” and the policy also refers to “Other Existing Employment Sites” Is it clear which type of sites each criterion is applicable to?
 - b) Should criteria 1 also refer to intensification?
 - c) Does criterion 1 b) require effects not caused by a development proposal to be mitigated, if so, is this consistent with national policy?
 - d) Are there potentially other impacts which should be considered which are not covered by criterion 1 c) and is the policy effective in this regard?
 - e) Is the geographical application of this policy on the submission Policies Map accurate?
 - f) Are the requirements set out in criterion 7 justified and effective?

Matter 7, Issue 2 – Whether the other economic development policies are justified, effective, consistent with national policy and positively prepared?

- Q1. Is Policy 31: Rural Economic Development sound?
- a) Is the geographical application of the policy or individual criterion clear? Is it clear whether proposals must comply with all criteria? How does criterion 2 relate to sites allocated in the Plan?
 - b) How has this policy taken into account allocations in Neighbourhood Plans?
- Q2. Is Policy 32: Conversion of Agricultural and Rural Building to Commercial, Community and Residential Uses sound?
- a) Is this policy only concerned with conversion to residential use?

b) Is the geographical application of this policy or individual criterion clear and how does the policy relate to sites allocated in the Plan?

Q3. Is Policy 33: Equestrian Development sound?

Q4. Is Strategic Policy 34: Tourism Facilities and Visitor Accommodation sound?

Q5. Is Strategic Policy 35: Town Centre Hierarchy and Sequential Approach sound?

a) Paragraph 86 d) of the NPPF requires planning policies to allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. What is the need and how would the Plan meet it and is the relevant evidence base up to date?

b) Where do neighbourhood centres to be provided as part of strategic allocations fit within the town centre hierarchy identified in table 8?

c) is the threshold for retail impact assessment of 500 metres square set out in criterion 5 justified?

d) is the geographical application of this policy accurately identified on the submission Policies Map?

Q6. Is Strategic Policy 36: Town Centre Uses sound?

a) Is it clear how a decision maker should react to criterion 4 when criterion 9 relates to proposals in Primary Frontages only?

Matter 8 – Housing

Matter 8, Issue 1 – Whether the housing requirement is justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 37: Housing Provision sound?
- a) Is the requirement for 13,212 homes between 2023 and 2040, below the local housing need for the area as determined by the standard method justified? Is it clear how the figure has been calculated and should this be explained more clearly in the justification text?
 - b) Would the adverse impacts of the Plan not providing for objectively assessed housing needs significantly and demonstrably outweigh the benefits of doing so when assessed against the policies in the NPPF taken as a whole? Is the overall housing requirement justified?
 - c) With reference to evidence, are the stepped annual requirements justified (in principle and scale of the step)?
 - d) Is the approach to the shortfall (the Liverpool method) justified?
- Q2. Are main modifications needed to the Plan to clarify the latest position with regard to the Crawley Local Plan and unmet housing need in the housing market area?
- Q3. Is there any substantive evidence that the Plan should be accommodating unmet need from neighbours, and if so, would it be sound to do so? In any event, should any unmet needs from other relevant areas be clearly identified in the Plan?
- Q4. Should Strategic Policy 37: Housing Provision also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development in line with paragraph 66 of the NPPF?

Matter 8, Issue 2 – Whether the overall housing land supply and site selection process is justified, effective, consistent with national policy and positively prepared?

NOTE: - The individual Site Allocations are considered under Matter 9 below.

- Q1. Were the proposed housing allocations selected on the basis of an understanding of what land is suitable, available and achievable for housing in the plan area using an appropriate and proportionate methodology, and are there clear reasons why other land which has not been allocated has been discounted?
- Q2. The NPPF at paragraph 74 states strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period? Is this achieved by Figure 6 of the Plan?

- Q3. The Plan does not appear to provide land to accommodate at least 10% of the housing requirement on sites no larger than one hectare as required paragraph 69 a) of the NPPF, why?
- Q4. Criterion 5 of the Strategic Policy 37: Housing Provision states 1,680 dwellings are anticipated to be delivered over the plan period from windfall sites? What is the compelling evidence this will be a reliable source of supply? Is this windfall allowance realistic and justified?
- Q5. What is the housing requirement for the first five years following the adoption of the Plan and what buffer should be applied? Would the Plan realistically provide for a five year supply of deliverable sites on adoption? Is a five year supply likely to be maintained thereafter?
- Q6. What is the estimated total supply of developable sites, from each source of supply, for years 6-10 and 11-15? What is the evidence to support this and are the estimates justified?
- Q7. Is the Council's approach to self-build and custom-built housing consistent with national policy? Is it clear how much of this type of housing will contribute to the overall housing land supply? Where is this addressed in the evidence?

Matter 8, Issue 3 – Whether the other housing policies are justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy 38: Meeting Local Housing Needs sound? Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?
- Q2. Is Strategic Policy 39: Affordable Housing sound?
a) Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?
b) Is the approach to First Homes consistent with national policy?
c) Is criterion 5 effective?
d) Would the needs identified be met?
- Q3. Is Policy 40: Improving Housing Standards in the District sound?
a) Having regard to the PPG¹ what is the requirement for accessible and adaptable housing in the District and how would the Council's approach meet it or not?
b) In line with the PPG², what is the evidence which establishes the need for internal space standards in the District?
- Q4. Is Policy 41: Rural Exception Homes sound?
a) Is it clear what is meant by "In exceptional circumstances" and "small-scale"?

¹ Paragraph: 009 Reference ID: 63-009-20190626

² Paragraph: 020 Reference ID: 56-020-20150327

- Q5. Is Policy 42: Retirement Housing and Specialist Care sound?
- Q6. Is Policy 44: Rural Workers Accommodation sound?
- Q7. Is Policy 45: Replacement Dwellings and House Extensions in the Countryside sound?
- Q8. Is Policy 46: Ancillary Accommodation sound?

Matter 8, Issue 4 – Whether the Plan is positively prepared, justified, effective and consistent with national policy in planning to meet gypsy and traveller accommodation needs?

- Q1. Have the accommodation needs of gypsies, travellers and travelling showpeople been robustly assessed? In the light of the Court of Appeal judgement in *Smith v SSLUHC & Ors [2022] EWCA Civ 1391*, does the need for gypsy and traveller accommodation need to be revised? Does this have implications for the provision of pitches in the Plan?
- Q2. Is the Plan consistent with national policy for the provision of gypsy and traveller accommodation as set out in the NPPF and Planning Policy for Traveller Sites? Is it positively prepared, justified and effective in doing so?
- Q3. Are the criteria used in Strategic Policy 43: Gypsy and Travellers consistent with the PPTS? Is it clear how any proposals for non-allocated sites will be assessed should they come forward over the plan period?
- Q4. Is Strategic Policy 43: Gypsy and Travellers sound?
- Q5. Is there any substantive evidence that the Plan should be accommodating unmet need from neighbours, and if so, would it be sound to do so? In any event, should any unmet needs from other relevant areas be clearly identified in the Plan?

Matter 9 – Sites Allocated for Development in the Plan

Matter 9, Issue 1 – Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy HA1: Strategic Site Development Principles sound? The justification refers to “Strategic Scale allocations” and “smaller housing allocations” and the policy refers to land allocated for “strategic scale development”. Is it clear which sites this policy applies to?
- Q2. Paragraph 10.125 of the Plan says the total number of homes for each site allocated is expected to be within 10% of the figure quoted, is this justified and effective? The policies also refer to a number of homes to be delivered within the plan period in different ways e.g. ‘at least’, ‘approximately’? Is this effective?
- Q3. Are the allocation policies all consistent with the wording in the NPPF and legislation with regard to heritage assets? e.g. preserve or enhance the character or appearance of a Conservation Area?
- Q4. Are Figures 7-9 consistent with the submission Policies Map, particularly the site allocation boundaries? What is the purpose of including Figures 7-9 in the Plan, are they effective? Do they reflect the proposed level of development within the Plan period? Should they be referred to as illustrative masterplans unless approved as part of a planning application?
- Q5. Should Policies HA2-HA4 explicitly state whether or not a masterplan will be required as part of any planning application and whether such masterplans should include details of the phasing of development based on the development constraints and infrastructure provision?
- Q6. Are the employment requirements detailed in Strategic Policies HA2-HA4 consistent with other policies in the Plan? Should the requirements be specified in terms of both employment land and employment floorspace? Are the employment requirements specified within each allocation expected to be delivered within the Plan period?
- Q7. Where do the neighbourhood centres sit in terms of the retail hierarchy set out in Strategic Policy 35 of the Plan? Will proposals for new neighbourhood centres need to be supported by retail impact assessment? If so, should this be specified in the relevant policies?
- Q8. Do Strategic Policies HA2-HA4 have sufficient monitoring and review mechanisms?

- Q9. Is Strategic Policy HA2: Land West of Ifield sound?
- a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?
 - b) Does this allocation accord with the Plan's vision and objectives?
 - c) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project and are main modifications needed to this policy, other policies of the Plan or the Plan's evidence base to reflect this?
 - d) Is the allocation consistent with paragraph 99 of the NPPF, particularly with regard to the loss of Ifield Golf Course?
 - e) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?
 - f) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?
 - g) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?
 - h) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?
 - i) Do homeworking facilities form part of the 2.0ha of employment floorspace?
 - j) Have the impacts on Crawley been adequately assessed and mitigated?
 - k) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?
- Q10. Is Strategic Policy HA3: Land North West of Southwater sound?
- a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?
 - b) Is this allocation consistent with The Southwater Neighbourhood Plan (2021) allocation for around 450 homes?
 - c) Is the secondary school critical to the delivery of the development allocated what progress has been made to date are there any barriers to its delivery?
 - d) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?
 - e) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?
 - f) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?
 - g) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?
 - h) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?
- Q11. Is Strategic Policy HA4: Land East of Billingshurst sound?
- a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?

- b) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?
- c) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?
- d) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?
- e) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?
- f) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?

Matter 9, Issue 2 – Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

- Q1. Is Strategic Policy HA5: Ashington Housing Allocation sound?
 - a) ASN1?

- Q2. Is Strategic Policy HA6: Barns Green Housing Allocations sound?
 - a) BGR1?
 - b) BGR2?
 - c) BGR3?

- Q3. Is Strategic Policy HA7: Broadbridge Heath Housing Allocation sound?
 - a) BRH1?
 - b) Should development be steered to part of the site at the lowest risk of flooding and has flood risk and the gas pipeline informed the site capacity?

- Q4. Is Strategic Policy HA8: Cowfold Housing Allocations sound?
 - a) CW1?
 - b) CW2?
 - c) Is criterion a) effective?

- Q5. Is Strategic Policy HA9: Henfield Allocation sound?
 - a) HNF1?

- Q6. Is Strategic Policy H10: Horsham Housing Allocations sound?
 - b) HOR1?
 - c) HOR2?
 - d) Is criterion g) justified and consistent with national policy?

- Q7. Is Strategic Policy HA11: Lower Beeding Housing Allocations sound?
 - a) LWB1?
 - b) LWB2?
 - c) LWB3?

- d) Is criterion 2 a) effective? Are criteria 2 b) and c) consistent with national policy?
- Q8. Is Strategic Policy HA12: Partridge Green Housing Allocations sound?
a) PG1?
b) PG2?
c) PG3?
- Q9. Is Strategic Policy HA13: Pulborough Housing Allocation sound?
a) PLB1?
b) Should criterion 3 refer to 2021?
c) Is criterion 5 a) necessary?
- Q10. Is Strategic Policy HA14: Rudgwick and Bucks Green Housing Allocations sound?
a) RD1?
b) RD2?
- Q11. Is Strategic Policy HA15: Rusper Housing Allocations sound?
a) RS1?
b) RS2?
c) Should the policy refer to 32 homes?
- Q12. Is Strategic Policy HA16: Small Dole Housing Allocation sound?
a) SMD1?
- Q13. Is Strategic Policy HA17: Steyning Housing Allocation sound?
a) STE1?
b) Are odour or noise mitigation measures necessary?
- Q14. Is Strategic Policy HA18: Storrington & Sullington Housing Allocations sound?
a) STO1?
b) STO2?
- Q15. Is Strategic Policy HA19: Thakeham (The Street and High Bar Lane) Housing Allocations sound?
a) TH1?
b) TH2?
- Q16. Is Strategic Policy HA20: Warnham Housing Allocation sound?
a) WRN1?
- Q17. Is Strategic Policy HA21: West Chiltington and West Chiltington Common Housing Allocations sound?
a) WCH1?

- b) WCH2?
- c) WCH3?

Matter 10 – Monitoring and Review

Matter 10, Issue 1 – Whether the Plan would be able to be monitored effectively to ensure timely delivery and trigger the need for review?

- Q1. How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to progress?
- Q2. How would the implementation of the Plan be monitored? Would it be effective? How would the results of any monitoring be acted upon? What would trigger a review of the Plan or specific policies within it? Are main modifications needed to the Plan to reflect this?
- Q3. Overall does the Plan deal adequately with uncertainty?