

1. **Introduction**

- 1.1 This Examination Statement is submitted by Reside Developments. Reside Developments are in control of a number of sites within the District, including two proposed allocations and a committed site.
- 1.2 Reside's Representations to Horsham District Council (HDC) Regulation 19 Local Plan consultation were submitted by Reside Developments and Stantec on behalf of Reside Developments. Representation Numbers, 1194238, 1194243, 1194248, 1194251, 1194253, 1194255, 1194258, 1194259, 1194263, and 1194264.

2. **Response to Inspectors Initial Matters, Issues and Questions on Matter 2 Issue 2 and 3**

Matter 2 Issue 2 – Whether the Spatial Vision and Objectives are justified, effective, consistent with national policy and positively prepared?

Q.1 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 No comment

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

- 2.2 No comment

Q.3 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?

- 2.3 No comment

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?

- 2.4 It is for the council to answer the first part, but we agree that this is not currently clearly defined. However, overall, we do not believe the current distribution is clear and it needs to be. We therefore reserve the right to respond to the council's answers to this point and any subsequent definitive distribution of housing if it is proposed.

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?

- 2.5 No Comment.

Q3. Is Strategic Policy 2: Development Hierarchy sound?

a) Are the settlement types described justified and effective?

- 2.6 Yes, it is believed that a number of the sustainable settlements set out are capable of supporting further housing growth than is currently being planned for within the draft plan. However, using Billingshurst as an example, we believe that the proposed approach is too restrictive in respect to the growth of the more sustainable settlements. The eastern expansion of Billingshurst is welcomed and supported, but the plan fundamentally misses an opportunity for proper growth and town planning.
- 2.7 Currently only a single site is proposed to be allocated on the eastern side of Billingshurst. We are aware of several sites that could support and bolster the eastern allocation, giving a greater range of sites, sizes and opportunities, which would deliver a full eastern masterplan.
- 2.8 We believe allocations, such as the east of Billingshurst allocation, should be more zonal, maximising the opportunities.
- 2.9 The Plan tightly delineates the east of Billingshurst, but then allocates a single site. This approach does not make the most of the potential for the settlements to deliver the homes needed in Horsham.
- 2.10 We believe this should be a much wider zone for development, which could still include known allocations now, but which has a higher overall number to be achieved. This would give the flexibility and maximise the housing delivered in an area highlighted by the council as being suitable for housing i.e. the east of Billingshurst. A masterplan could then be brought forward later for the precise allocations and land uses.
- b) Have all relevant settlements been identified and placed in the correct settlement type?*
- 2.11 No Comment.
- c) Have Air Quality Management Areas informed the classification of settlements into settlement types?*
- 2.12 No Comment.
- d) Are the built-up area boundaries and secondary settlement boundaries justified and effective?*
- 2.13 Reside believe that the built-up area boundaries/secondary settlement boundaries should be extended to include the proposed allocations and extant planning permissions. This is the approach that MSDC have taken with their submitted District Plan also currently at examination.
- 2.14 In not doing this, the plan is not considered up to date and, for example, does not reflect the true settlement boundary of a given settlement, which will hinder future growth, where the settlement boundary is drawn on a previous boundary line.
- 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?*
- 2.15 No Comment.
- 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”?

- 2.16 This is a restrictive policy and does not allow for changes in circumstances in the future. As such, this policy is not sound as currently written. The council cannot currently demonstrate a 5-year housing land supply and is proposing not to meet its need. Whilst this is purportedly due to water neutrality, the plan should be facilitating development wherever possible.
- 2.17 This is not going to be possible with Policy 2 as currently written. We are aware of many sites that could come forward to meet the housing need, that aren't currently proposed allocations, but which have their own bespoke water neutrality solutions and would be otherwise policy compliant.
- 2.18 As currently written, this policy would likely be used to hinder or prevent an otherwise suitable site from being supported.
- 2.19 We therefore wish to see the text relating to limiting development to be removed.

Q4. Is Strategic Policy 3: Settlement Expansion sound?

a) Is it consistent with other policies in the Plan?

- 2.20 Reside refers to its Regulation 19 representations on this policy in that we question the requirement of the policy and that criteria 1 is unnecessary and should be omitted.

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?

- 2.21 This policy highlights the issue/concern we have with the settlement boundaries currently not including allocation or site with planning permission. As currently drawn, this gives a false location for the settlement boundary, which compounds SP3 where settlements can be expanded where the site adjoins the settlement boundary. Where a current permission exists, this is not currently included in the settlement boundary and so adjoining the settlement boundary becomes almost impossible.

c) Does this policy apply to all settlement types identified in Strategic Policy 2?

- 2.22 No Comment.

d) Is it clear how a decision maker should react to the term “defensible boundary”?

- 2.23 This is not clear at all and needs further definition.

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?

- 2.24 Yes. It is not felt the criteria is required as it is covered by other policies within the plan.

f) Is the geographical application of this policy on the Policies Map effective?

- 2.25 No, for the reasons given in the answers above i.e. the strategic allocations are too restrictive and the settlement boundaries do not include allocations and/or extant permissions.

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?

- 2.26 Yes, we believe it should. This would assist the preparation of Neighbourhood Plans and ensure the overall number of homes proposed is delivered. Without this direction, NPs are free to do what they want. Elsewhere, where this approach has been used, we have seen NPs coming forward with no or a much lower level of housing proposed resulting in the 5-year housing supply for that area not being met.
- 2.27 The only remedy in such a case is then for small sites DPD being brought forward and/or a review of the local plan. However, both take time to come forward usually compounds the poor supply of housing.
- 2.28 We therefore believe that NPs should be allocated a number of homes to be met and that these are secured in plans by a particular date. Billingshurst NP for example has to undertake a review of their plan within 6 months of the adoption of this local plan. It is therefore imperative a target number of homes is given to NP areas.

Q6. Should the role of Neighbourhood Plans be more clearly articulated in Strategic Policies

- 2.29 Yes, we believe it should be clearly set out what each NP is expected to deliver. this is for two main reasons. Firstly, for certainty of what the plan will deliver, and how it will deliver it i.e. the role of the NP. Secondly, without it being clearly articulated, it is impossible to monitor and manage the delivery of the local plan, because you do not know what is being delivered, where or when.