

**Horsham Local Plan 2023-2040  
Examination of the Local Plan**

**Matter 2: Plan Period, Vision, Objectives and  
the Spatial Strategy**

Statement on behalf of A2 Dominion

November 2024

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**Client**  
A2Dominion

**Our reference**  
A2DS3001

21 November 2024

# 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 2: Plan Period, Vision, Objectives and the Spatial Strategy' set out in the Inspector's Matters Issues and Questions document (ID04 – 14<sup>th</sup> October 2024).
- 1.2 This statement should be read in conjunction with the other statements submitted on behalf of A2D, and their representations to consultation on the draft Local Plan.

## 2. Response to Matter 2: Plan Period, Vision, Objectives and the Spatial Strategy

**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?**

- 2.1 Firstly, we note the timetable set out in the Local Development Scheme (document SP03) envisaged that these hearing sessions would take place in October 2024, with Main Modifications consultation following in November and December 2024, with the Inspector’s Report received in March 2025. Adoption of the Local Plan was anticipated in May 2025.
- 2.2 In our view that timetable was always incredibly optimistic. It does not allow for the delivery of any additional information and, save for a very quick turnaround of the Main Modifications consultation appears to assume the Examination will proceed without any issue.
- 2.3 Nevertheless, we agree with the LDS that the Plan would not be adopted in the 2023 / 2024 year.
- 2.4 Consequently, it is evident that the envisaged Plan-period (2023 – 2040) would not provide a full 15-year period post adoption. For that to be the case, it would need to be adopted before the end of March 2025.
- 2.5 Paragraph 22 of the NPPF states:
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure” (our emphasis)*
- 2.6 The Planning Practice Guidance (PPG) reiterates this, stating<sup>1</sup>:
- “The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period.” (our emphasis)*
- 2.7 Therefore, the Plan-period should be extended so that it accords with the expectations of the NPPF and PPG. The Plan-period should be extended by at least one additional year to 2041), although that does not allow for any further ‘slippage’.
- 2.8 With the extended Plan-period, the housing requirement should be increased as a result. To the extent that the Plan can, or cannot, meet that extended need, and any

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<sup>1</sup> Paragraph: 064 Reference ID: 61-064-20190315

extended unmet needs from elsewhere, that would then be a material consideration as to its soundness.

**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?**

- 2.9 Firstly, we note that Strategic Policy 2: Development Hierarchy (nor any of the other policies for growth and change) recognises the importance (in terms of the sub-regional economy, and as a location for facilities and services) and sustainability credentials of Crawley. In our view that is a fundamental omission, not least in light of the very significant unmet housing needs (generally, but specifically in relation to affordable housing) arising from that town. It is unclear how the proximity of Crawley, and the relationship of this District to the town has influenced the Council's decisions on the locations of new development.
- 2.10 The fact that Crawley is outside of the District is immaterial to its role and function within the area. Crawley Borough Council itself recognised this fact, with Topic Paper 3 to that Local Plan Examination identifying at Paragraph 3.3.2 that "Crawley has a very important role in the sub-regional economy, and has been identified as being well located to support the delivery of economic growth."
- 2.11 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 which this Plan does not address.
- 2.12 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."*
- 2.13 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

providing growth related to Crawley and Gatwick, the plan may fail to respond to important considerations. Whilst we note that this Plan does include an element of growth adjacent to Crawley, this should not be apportioned to the unmet needs from the neighbouring authority, but seen in the context of a shortfall against HDC's need.

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