



Horsham District Local Plan Examination

Matters, Issues and Questions

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

Issues 1 - 3

November 2024

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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?

Question 1. 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?

1. It is now anticipated that the Plan will be adopted in the second half of 2025. This reflects the time taken to ensure the accurate processing of the 1,636 representations received in response to the Regulation 19 period, and the logistics and timing of the examination hearings which are slightly later than that predicted by the Council in its Local Development Scheme. Taking this into account the plan would look ahead over approximately 14.5 years rather than exactly fifteen years from the point of adoption.
2. In practical terms this means that there will be at least two reviews of the Plan before the end of the plan period that would consider changing circumstances in the area, changes to national policy and inform the Council as to whether any updates to the plan are necessary. As set out in the response to Issue 2 Question 1 below, two strategic sites (**HA2: Land West of Ifield** and **HA3: Land North West of Southwater**) are anticipated to continue to complete beyond the end of the plan period. A level of development for this period is therefore already known. It is therefore not considered that the small difference in the total plan period will make any significant impact, and the Plan will continue to be effective.

Question 2. 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?

3. The Council has been mindful of developing a strategy that is deliverable in the period to 2040 in accordance with **paragraph 22** of the NPPF. Within this context, strategic scale housing allocations have been identified as a sustainable approach to delivering housing growth.
4. Two strategic sites (**HA2: Land West of Ifield**, and **HA3: Land North West of Southwater**) will continue to build out beyond the plan period. Both sites are identified as strategic scale urban extensions, which will continue to build out beyond the end of the plan period, but will complete within a 30 year timescale. **HA2** is estimated to require around 8 years beyond the plan period, and **HA3** around 3 years. Planning Practice Guidance¹ requires a specific 30 year vision where developments will build out well beyond the plan period with development extending 30 years or longer from the start of the plan period.
5. **Paragraph 10.84** of the Plan recognises that during the course of plan preparation, Land West of Ifield was identified as having some potential to form part of a wider urban extension in the future, (as part of proposals for a wider urban expansion of 10,000 homes known as Land West of Crawley). This would have required a wider 30 year vision. However, there is no certainty at the current time that the wider urban extension is appropriate or deliverable. Policy **HA2** therefore provides a vision for the urban extension once it has been completed.
6. **Paragraph 10.100** of the Plan also recognises the longer term context for Land North West of Southwater, and the potential for the area to provide for housing growth through a strategic scale urban extension, completion of which would be slightly beyond this plan period. Again, policy **HA3** and the supporting text provide the vision for the urban extension once it has been completed.

¹ Paragraph reference ID 61-083-20211004

Q3. Is paragraph 2.12 consistent with the Levelling Up and Regeneration Act (2023) in relation to the South Downs National Park?

7. Section 245 of the Levelling Up and Regeneration Act (LURA) 2023 require that all relevant bodies (which includes Horsham District Council) seek to further the purposes of National Parks. **Paragraph 2.12** reflects the previous legal wording in relation to National Parks ('to have regard to the purposes'). It is therefore requested that the Inspector consider the main modification that has been proposed in **SD14: HDC Schedule of Suggested Modifications (HM006)** to ensure that this consistency with the new legal framework is maintained.

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?

8. **Paragraph 13** of the **NPPF** states that Neighbourhood Plans should support the delivery of Strategic Policies contained in Local Plans. **Paragraph 29** of the **NPPF** also sets out the Neighbourhood Plans should not promote less development than set out in the Local Plan or undermine strategic policies.
9. **Paragraph 1.6** of the Plan states that the plan contains Strategic Policies and that any Neighbourhood Plans which are prepared will be expected to be in 'general conformity' with these policies. This is a requirement that Neighbourhood Plans must meet in order to meet the 'Basic Conditions' test as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.
10. Within Horsham District, there are 29 parishes and one Neighbourhood Forum ('Horsham Blueprint') who have the ability to prepare Neighbourhood Plans should they choose to do so. Horsham District Council is not able to direct parishes or neighbourhood plan areas to prepare a plan. Each Parish Council and Neighbourhood Forum has different aims, aspirations and priorities, which has in turn influenced whether or not they have decided to prepare a Neighbourhood Plan, the timescales in which they have done so, and whether or not they have decided to allocate land for housing or other forms of development in their plan. The status of each parish / neighbourhood plan area is shown in **Table 1** in response to **Matter 1, Issue 2, Question 10**.
11. Given the varying status of the Neighbourhood Plans in Horsham District, together with the fact that the Council cannot require parishes to prepare or review plans, or make housing or employment allocations, **paragraph 2.18** sets out that that the Plan forms the framework for parishes wishing to prepare or review neighbourhood plans. It also states that allocations in Neighbourhood Plans will contribute to the delivery of housing or other identified development needs in the District. As the Council cannot insist on parishes making new allocations, only those (uncompleted) allocations in Made Neighbourhood Plans have been included in the Council's housing trajectory as set out in **paragraph 10.22** of the Plan, and as identified in more detail in **HO8 – Horsham Housing Trajectory** as updated by **HDC03: Housing Supply, September 2024**.
12. The paragraph is also clear that the Council will continue to provide support to different Neighbourhood Plan Areas. Bespoke advice is already provided by the Council's Senior Neighbourhood Planning Officer, with the assistance of other planning officers in both planning policy and development management teams. Some advice is also provided online². Given the specific needs and differing aspirations and timescales of different parishes, this approach is considered to be effective in ensuring that development requirements for the District are met.

² <https://www.horsham.gov.uk/planning/neighbourhood-planning/how-is-a-neighbourhood-plan-made>

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?

13. The spatial vision for the Plan is set out on **page 16** (at the end of **paragraph 3.13**). This vision draws on the wider planning context which is described in **Chapter 2**. This section of the plan makes reference to the requirements of the NPPF, outcomes of Duty to Co-operate discussions and the evidence base and considers the impact of water neutrality. It also takes account of the geographical context and the Council Plan 2023-2027 which sets the wider corporate objectives for the organisation.
14. **Chapter 3** sets out the spatial context, providing a high level ‘portrait’ of the District that provides information about its location, the economy, the environment and the need for housing in the area. This concludes that at a strategic scale, the key challenge for the District is to enable growth which is sustainable now and in the future, and that also ensures protection and enhancement of the environment.
15. The vision is then expanded in **paragraphs 3.14 to 3.24** setting out as to what it is envisioned the District will be like by 2040. As set out in **paragraph 3.25** this then feeds into the spatial objectives for the Plan, to enable the delivery of this vision. **Table 2 (page 20)** of the Plan then sets out which policies deliver against the objectives and therefore how the vision can be met.
16. As set out in the response to **Matter 2, Issue 1, Question 2** Horsham District Council has considered the appropriateness of a longer term horizon when developing the plan in accordance with **NPPF Paragraph 22** and the PPG. Policies and the supporting text for **HA2** and **HA3** in particular set out a more detailed vision for the strategic scale urban extensions, both of which will complete within a 30 year timescale.

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

17. The primary consideration of Objective 9 is in relation to retail matters rather than overall scale of development which is addressed in Objective 1 and Objective 8 (which then feed into Strategic Policy 2). Within the Local Plan, Objective 9 specifically relates to policies **Strategic Policy 5; Broadbridge Heath Quadrant**, and **Strategic Policy 35 – Town Centre Hierarchy** and **Strategic Policy 36 – Town Centre Uses**. In this context, the term ‘smaller market towns’ refer to the settlements of Billingshurst, Henfield, Pulborough, Southwater, Steyning and Storrington. This is intended to be consistent with the settlements identified by the Council on the business pages³ of its website. It is suggested that a modification to Objective 9 (and Objective 8) would assist in making this distinction clear. Suggested wording is set out in the **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024** document submitted with this statement (refs **SM03** and **SM04**).

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?

18. By their nature, the objectives for the plan are high level, with delivery of the objectives coming forward through the more detailed policies. The relative brevity of each objectives means that it is not possible to capture every individual policy nuance, but this does not mean policies do not exist to

³ <https://www.horsham.gov.uk/business/about-our-towns-and-villages>.

cover off these matters. Notwithstanding this point, Objective 8 seeks to protect the economic viability of Horsham Town, smaller market towns (and villages as per the response to **Question 2** above) as well as rural centres. The objective also promotes development appropriate to the existing settlement hierarchy. Objective 5 also seeks to bring forward development that takes account of community feedback and provides the necessary supporting infrastructure. It is considered both these objectives adequately enable provision of facilities outside Horsham town and smaller towns and villages. By way of example, **Strategic Policy 35 – Town Centre Hierarchy** recognises settlements outside these categories as ‘Local Centres’ in retail terms. It is therefore not considered further modification to the objectives is necessary.

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?

19. The proposed distribution of both housing and employment development is set out in detail in Appendix 1. This breakdown is provided year by year for housing, (based on the sites and trajectory set out in **HDC02: Topic Paper 2**). It was not possible to provide annual figures for employment delivery as there is less certainty as to the exact timescales of delivery for employment growth. These are therefore shown in five yearly increments.

Housing Distribution

20. Horsham town will see the delivery of 2,893 homes in total at an average of 192 homes per year. Delivery is consistent across the plan period. Additional growth is also identified in **HA2: Land West of Ifield** which would bring forward 179 homes a year on average in years 6 to 15 of the plan. This development is located at the edge of Crawley – another higher order settlement which is outside the administrative boundary of the District.
21. In Small Towns and Larger Villages, housing development will take place over the plan period as a whole, particularly at Southwater and Kilnwood Vale. Other settlements in this category will deliver housing broadly within the first 10 years of the plan. The average number of new homes that will be delivered per settlement in this category is 484 homes each, over the plan period as a whole. Whilst there is some variation, (as villages in the south of the district are more environmentally constrained and have less scope for expansion), this total is reflective of the lower level of services/ facilities in these settlements than compared with Horsham.
22. Medium villages will grow by an average of 112 homes per settlement over the plan period as a whole, again reflecting the lower level of services and facilities in these settlements and their ability to support growth and expansion. Some development is anticipated to come forward very early in the plan period (e.g. as neighbourhood plan sites which have planning permission build out), with the majority expected to come forward between years 7 and 10, with a few coming forward in the last five years of the plan. Smaller villages and secondary settlement have a similar timescale for growth (i.e. some existing early commitments and further delivery years 7-10), but will see an expansion of 39 homes per settlement over the plan period and 9 homes respectively. This is again consistent with the more limited ability of these settlements to accommodate growth and expansion.
23. Only 20 homes are identified to come forward in ‘unclassified settlements’ at this time over the plan period as a whole. This comprises one allocation in Itchingfield which was initially identified by the Parish Council during the preparation of their Neighbourhood Plan.

Employment

24. Employment growth in and around Horsham is expected to deliver 81,488m² of new employment space. Delivery is expected to come forward across the plan period as a whole, but due to the delivery of new land on strategic sites, the majority of it is expected to come forward in the middle of the plan period. Additional employment land is also allocated in **HA2: Land West of Ifield**, which is expected to deliver this land adjoining the higher order settlement of Crawley, outside the administrative boundary of Horsham.
25. Larger towns and smaller villages will see 9,247m² of employment growth per settlement on average. Again, this will take place over the plan period, with most growth anticipated in the middle of the plan period. Medium villages are expected to deliver 1,743m² of employment land per settlement on average over the plan period. Some of this will come forward in years 1-5 (existing commitments) with the remainder in years 11-15. Smaller villages will deliver an average of 227m² of additional employment land per settlement over the plan period. This is expected to be delivered in the first five years of the plan. This reflects existing commitments and growth of rural businesses located in these areas rather than specific allocations. Secondary and unclassified settlements will also see some growth in years 1-5 in existing rural business parks in unclassified settlements where development has been permitted. Growth rates in each location are small, reflecting the nature of these businesses.
26. Collectively, this data shows that development is focussed around the largest settlement of Horsham, with decreasing levels through each category thereafter. This approach is therefore considered to be justified and effective.

Q2. Is Strategic Policy 1: Sustainable Development sound?

27. The Council considers this policy is sound. In summary:
 - As a 'model policy' this policy reflects the overarching strategy of the Local Plan as a whole as a means of delivering Sustainable Development and in particular seeks to meet development needs as far as possible. The policy also outlines how development proposals will be considered in the event that there are no relevant development plan policies, or they are deemed out of date (should for example new government policy requirements be introduced during the plan period, prior to any review being completed). The policy therefore enables a positive approach to continue to be taken in these circumstances. It is therefore **positively prepared** and consistent with **national policy**.
 - The policy sets an overall approach to delivering sustainable development in the District which is evidence base and alternatives have been considered through the Sustainability Appraisal process. Where development proposals accord with the development plan policies, they will be approved unless material considerations indicate otherwise. It is therefore **justified and effective**.

a) Should this policy or its justification have a greater emphasis on reducing the need to travel by private motorised transport?

28. As set out above, **Strategic Policy 1** is an overarching policy to ensure that a positive approach is taken when considering development proposals. In addition, **paragraph 1.6** of the plan makes clear that all policies should be read in conjunction with each other.
29. **Strategic Policy 24: Sustainable Transport**, provides further detail as to the Council's expectations in relation to transport matters. **Paragraph 8.9** of the plan is clear that there are opportunities in the plan to reduce car use by making other (lower carbon) forms of travel more attractive, and mechanisms to provide for this are set out in the wording of **Strategic Policy 24**. It is therefore not considered that further detail on this matter is required in either the policy or its justification.

Q3. Is Strategic Policy 2: Development Hierarchy sound?

30. As set out in **HDC02 Topic Paper One: The Spatial Strategy**, development in Horsham District has traditionally focused on smaller scale development adjoining existing villages and towns and larger scale urban extensions to deliver more strategic levels of growth. This has been delivered through a development hierarchy (Policy 3 of the existing Horsham District Planning Framework (hereafter HDPF **HDC05**) which was found to be sound at the last Local Plan examination (**HDC06**)
31. To provide a **positively prepared** strategy that meets objectively assessed needs as far as possible, a range of spatial growth options have been tested through the Sustainability Appraisal process (**SD03a-d**) and is described in more detail in the response to **Matter 1, Issue 2, Question Four**. Document **HDC02** also summarises these high level spatial options and **paragraphs 5.7 to 5.10** of that paper outline that this assessment concluded that continuation of the existing settlement hierarchy together with allocating new urban extensions represented the most sustainable options for meeting identified development needs.
32. To ensure that the settlement hierarchy remained a **justified and effective** means of meeting needs, **Document EN07 – Settlement Sustainability Review Assessment** sets out the results of the Council's review of its existing settlement hierarchy to ensure that it remains fit for purpose. This study took account of a range of characteristics from each settlement, including population statistics, employment sites, school provision, retail, transport and presence of a wide range of other community facilities. The outcome of this study concluded that in broad terms, Horsham town remains the most sustainable settlement in the district. A number of 'smaller towns and larger villages' such as Southwater and Billingshurst also continue to perform well against a range of sustainability criteria and act as hubs for other surrounding smaller settlements. These were therefore assessed as being able to accommodate or absorb a higher level of growth than other smaller settlements. Other smaller settlements were assessed as being able to accommodate some additional development to help ensure existing services and facilities remain viable in the future. The study did however identify that the district contains some smaller hamlets which are currently classified as 'countryside', and which therefore have the potential of artificially restricting a very small amount of development that would help these settlements retain their character and function. An additional criterion of 'secondary settlements' is therefore proposed to enable the needs of these settlements to continue to be met. This therefore ensures that this policy approach continues to deliver sustainable development and is therefore **consistent with national policy**.

[a\) Are the settlement types described justified and effective?](#)

33. **Strategic Policy 2: Development Hierarchy** identifies six different classifications of settlement in **Table 3** of the policy wording. These are: Main Town, Small Towns and Larger Villages, Medium Villages, Smaller Villages, Secondary Settlements and Unclassified settlements. Each category is accompanied by a description of the settlement characteristics and function. With the exception of 'Secondary Settlements' this is a continuation of the approach and settlement types in Policy 3 of the HDPF (**HDC05**). As set out in paragraph 32 above, **Document EN07: Settlement Sustainability Review Assessment** undertook a detailed assessment of the sustainability of each settlement. Appendix 1 of **EN07** provides a summary of the results, with full details presented in Appendix 2 of that document. The outcome of this work illustrates that whilst the precise characteristics of each settlement vary, they can be grouped into settlements which have broadly similar levels of services / facilities and therefore ability to accommodate new growth. It was therefore considered **justified and effective** to continue this approach. As outlined above, it is proposed to add an additional criterion of 'Secondary Settlements'. This category is proposed to be added to enable the needs of these settlements to continue to be met.

[b\) Have all relevant settlements been identified and placed in the correct settlement type?](#)

34. Horsham District has a settlement pattern which has established over a long period of time, with many settlements having been present in some form for many hundreds of years. The largest of these settlements are already identified within the existing HDPF policy 3 (**HDC05**). The process of identification of Secondary Settlements is set out within **EN02: Secondary Settlement Boundary**

Review to determine which village or hamlet would be appropriate for designation as a secondary settlement. Section 2 of **EN02** sets out that these settlements were initially identified through a desk top study, with visits made to assess each against a series of criteria. The responses to representations received during the Regulation 18 stages of consultation were taken into account with reassessment undertaken where relevant (**EN02, para 3.1**).

35. Paragraph 32 above sets out how each settlement has been assessed to ensure that it has been placed within the correct settlement category.

[c\) Have Air Quality Management Areas informed the classification of settlements into settlement types?](#)

36. Air Quality Management Areas (AQMAs) are designations that are made when air quality falls below set statutory criteria. They can vary in size from a single property to an entire district/borough, and can also be revoked in situations where Air Quality levels improve. Whilst a requirement of AQMAs is to prepare Action Plans to address how air quality will be improved they do not set 'caps' on the level or quantum of development that can be provided. This is therefore not considered to be a relevant consideration in relation to the classification of settlement types, which primarily focussed on the characteristics and function of the town or village in question.

[d\) Are the built-up area boundaries and secondary settlement boundaries justified and effective?](#)

37. **The Sustainability Appraisal Update December 2023 (SD03a)**, and **HDC02: Topic Paper 1** explains how spatial options for growth have been considered. This concluded it was appropriate to focus growth in and around Horsham town, and other settlements in accordance with a settlement hierarchy, together with the allocation of new urban extensions. The primary purpose of built-up area boundaries and secondary settlements is therefore to provide certainty in policy terms as to which areas development is accepted in principle, or areas outside this where land is considered to be countryside and where **Policy 14: Countryside Protection** would be applicable.
38. The evidence base documents **EN01: Built-up Area Boundary Review** and **EN02: Secondary Settlement Review** set out the Council's approach to determining the boundaries of built-up area boundaries and secondary settlements. Both documents set out the methodologies that have been used by the Council in determining the appropriate boundaries, in order to ensure that a consistent approach has been taken across all relevant settlements in the District. In **EN01**, Section 2 describes the assessment methodology that was used for the identification of land for review, and the assessment methodology that was applied. This has taken into account the potential for settlement coalescence, landscape and rural character, gardens how other factors such as allotments or playing fields on the edge of BUABs have been considered. The process for considering the boundaries of secondary settlements is covered in paragraph 34.
39. Both documents and proposals have been subject to consultation during the preparation of the plan. In response to proposed changes and amendments were considered. **EN01** and **EN02** set out tables which include the outcome of the Council's assessment and its reasons for accepting or rejecting the proposed amendments. The BUABs and secondary settlement boundaries are therefore considered to be 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?](#)

40. The primary purpose of **Strategic Policy 2** is to direct growth to within defined settlement or secondary settlement boundaries. The classification of the different settlement types (as discussed in the response to questions a and b above), relate to the broad quantum of growth individual settlements can absorb through redevelopment and infilling. In order to provide a distinction as to where such redevelopment / infill would be acceptable in policy terms, built-up area boundaries have been identified.

41. It is however recognised that additional allocations and development outside existing settlements is necessary to meet identified development needs. These principles are set out in **Strategic Policy 3**. Broadly however, the scale and location of allocations has followed the settlement hierarchy, in order to continue to maintain the overarching settlement pattern of the District. Whilst allocations identify where the principle of development is acceptable, at this stage development in these areas has not yet commenced. Therefore the approach that the Council has followed (and has done so in previous local plan reviews) is to define the final built-up area boundary as part of a Local Plan review, once development has commenced and the precise design / layout of the development is known.
42. With regard to Crawley, **paragraph 4.29** recognises that the town is higher order settlement with the ability to accommodate additional growth and development but recognises that the settlement is outside the administrative boundary of the District.
43. Crawley comprises a number of different neighbourhoods, each of which are able to meet the day to day needs of its residents. Where urban extensions of Crawley have been identified in Horsham District, this principle has continued to be followed. Kilnwood Vale (which has commenced) has therefore been identified as a small town / large village in the context of the Horsham plan, as the scale and function of this neighbourhood is similar to that of other Larger Villages / small towns – which also rely on other larger order centres for some of their needs.
44. Whilst it is anticipated that Land West of Ifield will come forward using a similar neighbourhood principle, and **HA2** establishes the principle of development, no development has commenced. Given that the very precise form and layout has yet to be finalised, it is considered it would be consistent for any settlement classification and BUAB designation to be determined in a future Local Plan review.

[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”?](#)

45. The primary purpose of Policy 2 is to direct growth to within defined settlement or secondary settlement boundaries (with the principles of settlement expansion addressed in Policy 3). It is not intended that any individual paragraph in the supporting text for this policy be read in isolation. **Paragraphs 4.29 to 4.33** provide the broad context to the policy, and recognise that in general terms larger settlements have the ability to accommodate greater levels of growth than smaller ones (i.e. more ‘limited development’). **Paragraphs 4.34 and 4.35** then provide further clarity on the level of development that would be considered appropriate. This confirms that within built-up area boundaries the principle of development is accepted (**paragraph 4.34**) and development proposals will need to be of a scale and nature that can retain the character and role of the settlement in terms of the range of services, facilities and community cohesion (**paragraph 4.35**). This is then specified in the wording of Strategic Policy 2 (particularly clause 1).

Q4. Is Strategic Policy 3: Settlement Expansion sound?

46. **Paragraph 15** of the **NPPF** is clear that the planning system should therefore be genuinely plan led. Recognising that it would not be possible to meet objectively assessed needs as far as is possible without additional housing and employment allocations, Strategic Policy 3 provides the strategic policy approach to deliver plan led growth, in addition to redevelopment within settlements (as set out in Strategic Policy 2). The approach is therefore considered to be **positively prepared**.
47. The principle of settlement expansion has been tested through the sustainability appraisal process. Paragraph 5.10 of **HDC02; Topic Paper 1: The Spatial Strategy** highlights that a continuation of the existing settlement hierarchy together with allocating new urban extensions represented the most sustainable option for meeting identified development needs. This subsequently informed the development of 15 potential scenarios for development quantum and growth locations that were tested in the Sustainability Appraisal. (**SD03a-d**). The outcome of this work is summarised in paragraphs 5.19 to 5.23 of **HDC02**. The policy approach is therefore considered to be **justified**.

48. The policy is also considered to be **effective** as it provides a framework to enable the allocation of land for development, both within the Local Plan and by communities choosing to allocate land within their neighbourhood plans. This approach has already proven effective through the current local plan, which allocated strategic scale developments, and has also enabled the allocation of land for some 1,992 homes in neighbourhood plans. (See **Table 1, Matter 1, Issue 2, Question 10**). The policy wording is also **consistent with national policy** as it sets a framework for growth that is consistent with the principles of sustainable development.

[a\) Is it consistent with other policies in the Plan?](#)

49. Yes. **Paragraph 1.6** of the Plan states that all policies are related to each other and that the document should be read as a whole. As set out in paragraph 40 and 45 above, the primary focus of policy 2 is to direct growth to within defined settlement or secondary settlement boundaries. Point 2 of Strategic Policy 3 enables expansion to come forward that is appropriate to the scale and function of the settlement type. These principles then feed through into the allocation policies **HA2 to HA21**. The policy also sets a framework for neighbourhood plans, where communities allocate additional land for development.

[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?](#)

50. Yes. As set out in the response to **Matter 2, Question 3**, it has been concluded through the sustainability appraisal process that continuation of the existing settlement hierarchy strategy of a continuation of the existing settlement hierarchy together with allocating new urban extension represented the most sustainable approach to growth. Paragraph 46 above also highlights the NPPF position that development should be plan led, and therefore it is appropriate to have a set of policy criteria that guides this growth over the plan period. Paragraph 48 of this response sets out why this policy approach is considered to be effective. Conversely, development that does not adjoin settlement boundaries was found to adversely impact the settlement pattern rural character, and depending on the precise location of the proposal would adversely impact on sustainable transport patterns.

[c\) Does this policy apply to all settlement types identified in Strategic Policy 2?](#)

51. The second sentence of **Strategic Policy 3** seeks to set out the circumstances where the expansion of existing settlements will be supported. Given the very small size of settlements identified as secondary settlements, it is not considered that allocations that expand these settlements will bring forward sustainable development as they will be highly reliant on travel to other settlements, and do not have good public transport links.
52. In addition, it is not considered that where strategic site allocations which have yet to commence or where development is yet to complete (e.g. land North of Horsham, or Land West of Ifield) would be included within this policy requirement, as any further expansion of these areas would be best considered as part of a future local plan review. Therefore **SD14: Schedule of Suggested Modifications to the Regulation 19 Local Plan** has proposed a modification (**Reference HM008**) to the policy wording to make this point clear.

[d\) Is it clear how a decision maker should react to the term “defensible boundary”?](#)

53. Yes. A definition of a defensible boundary is provided in the **Glossary** of the Local Plan. Information is therefore available to how this term can be interpreted. In broad terms these are distinctive features that can form a boundary to development such as a stream or road.

[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?](#)

54. In general terms, it is recognised that policies should not repeat other policy requirements, given that the plan and its policies should be read as a whole. Given the overarching requirement of this

strategic policy to protect settlement character, this policy does make reference to landscape and townscape character in point 5 of the policy. A further overarching requirement for the plan is that it can demonstrate water neutrality, and therefore a reference to this requirement was considered to be appropriate in order to guide allocations in both this or any future neighbourhood plan reviews.

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

55. The purpose of this policy is to help guide the allocation of land outside built up area boundaries. This is shown on the policies map through the delineation of built-up area boundaries, or as Local Plan or Neighbourhood Plan allocations. The policies map also shows the areas classified as 'countryside'. This geographical application continues the existing approach on the current policy map, which has been found to be effective. No further amendments are considered to be necessary.

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?

56. The purpose of **Policy 2** is to identify a broad settlement hierarchy, with **Policy 3** setting the criterion by which settlement expansion is considered acceptable. Provision is made in the Plan for windfall development, but by its nature the exact location and quantum of this type of growth cannot be known in detail at this stage. To ensure policies are flexible and effective over the plan period, it is not considered that it would be beneficial to identify or set a precise amount of windfall development that would be acceptable in each settlement as this may place an artificial cap on development.
57. **Strategic Policy 29: New Employment** provides detail as to the quantum of growth that is expected to be delivered through the new employment allocations, together with that set out in the strategic allocations. **Strategic Policy 37: Housing Provision**, together with the allocation policies **HA2 to HA21** sets out the number and location of homes that are expected to be delivered in the plan period. It is not considered that it is necessary to duplicate this in Policy 2 or 3.

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?

58. **Strategic Policy 2** deals with development hierarchy and settlement expansion. Matter 2, Issue 1, Question 4 sets out the relationship between the local and neighbourhood plans in more detail. It is however recognised that whilst **paragraph 4.35** states that the priority is to locate appropriate development and infilling in accordance with the development hierarchy, further clarity that this applies to both the local and neighbourhood plans. Suggested wording for this clarification is set out in **SM05** of **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**.
59. **Paragraph 1 of Strategic Policy 3** make clear that the policy is applicable to communities who are seeking to make allocations in Neighbourhood plans. **Paragraph 4.37 and 4.38** provide some explanation as to the role of neighbourhood plans and their approach to allocating land should they choose to do so as part of a Neighbourhood Plan. For the avoidance of doubt in terms of this relationship, suggested wording to clarify this point in **paragraph 4.37** is set out in **SM06** of **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**.