



Examination Statement

Prepared on behalf of Bellway Homes and Crest Nicholson (Representor Number 1194442)

Land East of Billingshurst

Horsham District Council Local Plan
Examination in Public

Matter 8: Housing

Examination Statement – Horsham District Local Plan

Land East of Billingshurst



Contents

| | |
|--|---|
| 1. Introduction | 3 |
| 2. Response to the Inspector's Questions | 4 |
| 3. Conclusion | 8 |
| Appendix A Glossary | 9 |

Appendices

Appendix A – Glossary

1. Introduction

- 1.1. This Examination Statement has been prepared on behalf of Bellway Homes Ltd and Crest Nicholson (Bellway and Crest), to respond to the relevant questions the Inspector has raised in relation to **Matter 8**. Bellway and Crest are the joint promoters of Land East of Billingshurst (Draft Strategic Policy HA4).
- 1.2. Prior to the submission of the emerging Local Plan by HDC to the Planning Inspectorate for examination, Savills on behalf of Bellway and Crest have participated in the formal consultations of the Local Plan at the Regulation 18 (R18) and Regulation 19 (R19) stage. In addition, the site has been submitted to HDC through the Call for Sites process and assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2018/19 and Site Assessment Report (2023). Bellway and Crest have also met throughout the process with policy officers from HDC to discuss the strategic opportunity of Land East of Billingshurst.
- 1.3. As evidenced within the R19 representation, Bellway and Crest confirmed their support for the emerging Local Plan and therefore this representation should be read alongside this Hearing Statement. It is therefore considered that the Plan is broadly supported subject to minor objections. Overall, the Plan is currently not found sound given its failings in positive preparation, effectiveness and consistency with national policy (due to minor technicalities and that it does not appropriately account for identified housing need in accordance with the Standard Method).
- 1.4. Since the submission of the R19 representation, further evidence base documents have been made available by HDC, notably Topic Papers 2: Housing Supply (HDC03) and Topic 1: The Spatial Strategy (HDC02). These documents were not available for review at the R19 stage, therefore will be commented on within this Hearing Statement.
- 1.5. As per the area of the emerging allocation HA4, the location of the site, its surroundings and the vision for the Last East of Billingshurst were set out in detail in the representations made to the R18 and the R19 Plan consultation (Respondent ID: **1194442**). For the avoidance of doubt, this includes the land being promoted by Crest and Bellway and the approved Amblehurst Green development which all sits within the area of the emerging allocation HA4.

2. Response to the Inspector's Questions

Matter 8 – Housing

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?**

2.1. In response to Issue 1 parts a, b and c, it is considered that the housing requirement included in the HDLP does not meet the housing needs in accordance with the Standard Method. On this basis, it is therefore essential that Draft Strategic Policy HA4 (Land East of Billingshurst) is delivered on the basis of allowing a minimum of 650 new homes in order to deliver the necessary housing growth and affordable provision for Horsham. As set out within the R19 Representation, the site is immediately available and unconstrained by any designation. Its contribution towards the housing requirements, is fundamental to achieving the strategy and objectives of the Draft Plan.

2.2. HDC's rationale behind the reduced housing target for the plan centres around the issue of Water Neutrality. Whilst Bellway and Crest strongly support the adoption of a new Local Plan, and policy HA4 in particular, the overall approach proposed by HDC – not to meet the Standard Method 'LHN' is unsound and is not justified.

- 2.3. As has been set out within the R19 representations with respect to Water Neutrality, this is ultimately not a matter for the development industry to solve. The concerns in this respect are not repeated here. However, the fact that the issue has not been appropriately addressed by the water industry does not provide sufficient justification to reduce the housing delivery over the plan period as a solution must be reached. Nor does the fact that the issue has had an impact on the determination of planning applications over the recent years, as prior to this HDC had a strong track record of meeting housing needs and consistently delivering housing against the LHN and adopted targets. In 2021, HDC produced another version of the emerging Local Plan that met its own housing needs in full. Through this earlier version of the plan, HDC confirmed that meeting objectively assessed needs and going beyond the standard method was in fact sustainable. Given that Water Neutrality issues are currently being proposed to be resolved through appropriate mitigation, Bellway and Crest query the level of impact Water Neutrality actually has on housing delivery.
- 2.4. Subsequently, Bellway and Crest do not consider that exceptional circumstances have been provided to deviate from the Standard Method and further evidence is required to ensure the plan is justified and effective. Bellway and Crest consider that the issue of Water Neutrality must be addressed and solved, in order to be consistent with national policy.

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

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?

- 2.5. Bellway and Crest consider that the process with regards to site allocations does broadly meet this requirement. The approach taken to the allocation of Policy HA4 follows the overall spatial strategy for the plan with regards to locating new strategic development in Billingshurst, a principal centre which serves a wider need of the community. Bellway and Crest have specific technical concerns with allocation HA4, in respect of its area, and the plans supporting it – as outlined in the Matter 9 Statement.

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?

- 2.6. Bellway and Crest provide further comments specific to the delivery of strategic allocation HA4 in the Hearing Statement for Matter 9.

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

Q5. Is Policy 42: Retirement Housing and Specialist Care sound?

- 2.7. Crest and Bellway consider Policy 42 to be broadly sound but question the need for C2 provision to be allocated as part of Strategic Policy HA4. There is no explicitly stated quantum or even a range for provision of older persons homes, and therefore, no way of determining whether such a specific need as required to be delivered as part of the HA4. For the Plan to be positively prepared and effective, care home provision should be expected to come forward across the district on sites, which have been carefully considered by HDC to be appropriate to deliver care home provision.

- 2.8. Through Draft Policy HA4, Bellway and Crest will be delivering numerous elements including at least 650 new homes (35% affordable provision), a community building, serviced land for a new primary school, employment provision and G&T pitches, in addition to play and open spaces. The need for additional C2 provision as part of this emerging allocation is therefore questioned as it does not appear to be informed in detail by any of the evidence base and initial masterplanning process that has taken place to date. All proposed units to be delivered by Bellway and Crest will of course meet the M4 (2) requirements for accessible and adaptable units in addition to M4 (3) units.

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?

Q4. Is Strategic Policy 43: Gypsy and Travellers sound? Q4. Is Strategic Policy 43: Gypsy and Travellers sound?

- 2.9. Yes. A fair and reasonable proportion of the G&T needs can be accommodated on Policy HA4.

Examination Statement – Horsham District Local Plan

Land East of Billingshurst



- 2.10. Bellway and Crest support the need to deliver Gypsy and Traveller pitches within the District but question the requirements around the management and maintenance of these pitches as part of the strategic allocations. In order for the policy to be effective the management and maintenance of these pitches need to be considered.

3. Conclusion

- 3.1. This Examination Statement has been prepared by Savills on behalf of Bellway and Crest in relation to **Matter 8** of the HDC Local Plan Examination. These comments should be read in conjunction with the R19 Representations (Respondent ID: **1194442**) that were submitted in March 2024.
- 3.2. HDC's housing Trajectory (dated January 2024) was published on 16 September 2024 and sets out the timescales for delivery in relation to Draft Policy HA4 (please refer to the Delivery Statement for more information). This shows that the site is within the emerging five year housing land supply (5YHLS) (2024-2029), a position which Bellway and Crest fully support. Bellway and Crest therefore support the HDLP but have raised concerns in respect of Strategic Policy 37 and the impacts that Water Neutrality creates with regard to housing delivery.
- 3.3. It is considered that HDC should be seeking to meet its housing requirement in full as the Water Neutrality issue should not prohibit the delivery of homes across the entire Plan Period. By doing this, it is crucial that Strategic Allocations such as HA4 are supported in order to accelerate housing delivery within the early period of the Local Plan. Its contribution towards the housing requirements, is fundamental to achieving the strategy and objectives of the HDLP.

Appendix A

Glossary

GLOSSARY

| | |
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| BNG | Biodiversity Net Gain |
| HRA | Habitat Regulations Assessment |
| WSCC | West Sussex County Council |
| LLV | Local Landscape of Value |
| HDC | Horsham District Council |
| HDPF | Horsham District Planning Framework |
| DHDLP | Draft Horsham District Local Plan |
| NPPF | National Planning Policy Framework |
| R18 | Regulation 18 |
| R19 | Regulation 19 |
| RP | Registered Provider |
| SA | Sustainability Assessment |
| SHELAA | Strategic Housing and Economic Land Availability Assessment |
| SSSI | Site of Special Scientific Interest |
| SuDS | Sustainable Drainage Systems |
| SNOWS | Sussex North Offsetting Water Scheme |
| SNWRZ | Sussex North Water Resource Zone |
| 5YHLS | Five-year Housing Land Supply |

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