

Horsham Local Plan 2023-2040 Examination of the Local Plan

Matter 8: Housing

Statement on behalf of Barratt David Wilson
Southern Counties

November 2024

1. Introduction

- 1.1 This Statement is submitted on behalf of Barratt David Wilson Homes Southern Counties (hereafter referred to as 'BDWHSC') to the Horsham Local Plan Examination in response to 'Matter 8: Housing' as set out in the Inspector's Matters Issues and Questions document (ID04 – 14th October 2024).
- 1.2 This statement should be read in conjunction with the other statements submitted on behalf of BDWHSC, and their representations to consultation on the draft Local Plan.
- 1.3 BDWHSC have built a number of developments within Horsham District, recent developments include sites in Storrington and Henfield. BDWHSC has an interest in, and has actively promoted the at land at Dunstons, Shermanbury Road, Partridge Green.
- 1.4 The land promoted by BDWHSC at Dunstons, Shermanbury Road, Partridge Green was considered during the preparation stages of the Horsham Local Plan as is identified as site SA634 within the SHELAA (2018) and was included in the Council's Regulation 18 draft Local Plan as a potential site allocation (Map 15 – Partridge Green). See **Figure 1** below.

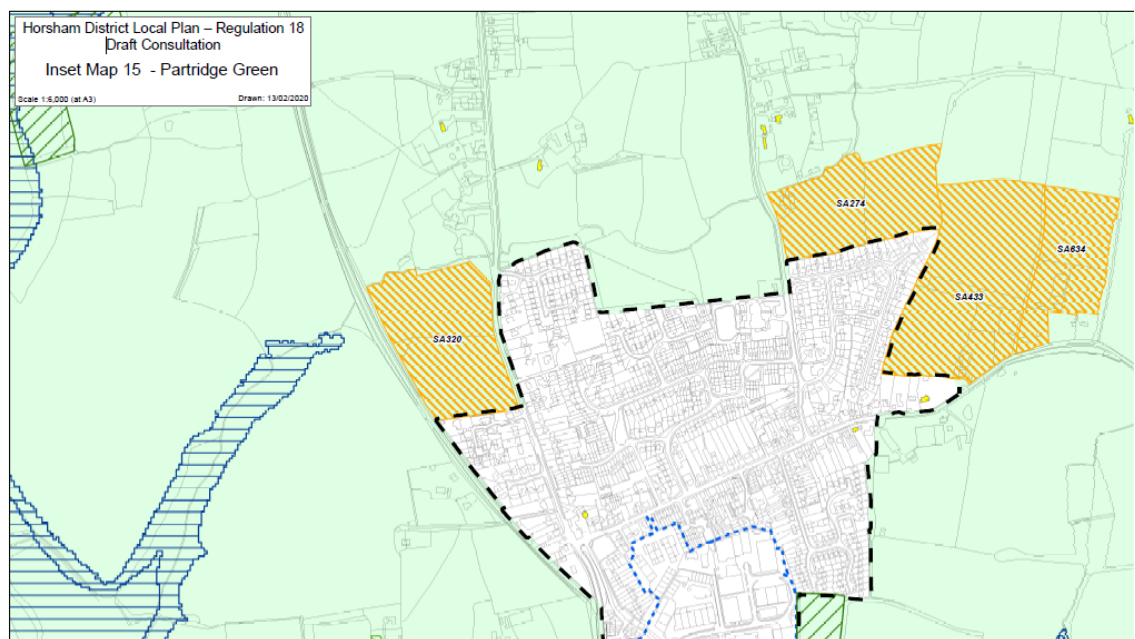


Figure 1: Horsham District Local Plan - Regulation 18 Draft Consultation (Inset Map 15)

- 1.5 Following Regulation 18 consultation, the site was assessed again and was subsequently removed from the Regulation 19 draft Local Plan as a site allocation.

2. Response to 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?

- 2.1 No, the Council's housing requirement figure is not justified and the Council's evidence as to how they arrived at this figure is not clear. This response should be seen in the context of paragraph 60 and 61 of the Framework.
- 2.2 Paragraph 10.4 of the submission Local Plan (SD01) refers to the standard methodology calculation for Horsham District in 2023 as being **911 dwellings per annum**, equating to **minimum of 15,487 homes** in the 17-year period between 2023 and 2040. Paragraph 10.21 of the submission Local Plan (SD01) explains what the Council actually seeks to provide for **13,212 homes**.
- 2.3 The Council has published an updated housing trajectory (document HDC03) which identifies a housing supply figure of 13,412 homes to be delivered between 2023 and 2040. We note that this equates to **788 homes per annum**.
- 2.4 The shortfalls against the Local Housing Need figures have not been justified. As a matter of fact, the Local Plan will significantly undersupply new housing compared to the expectation of the Local Housing Need. That is before any adjustment is made for other reasons (such as affordable housing considerations, economic growth and unmet needs).
- 2.5 The Main Modifications do not change Strategic Policy 37 despite the revised trajectory. This results in additional confusion as the Policy will still refer to 13,212 dwellings and requirements of 480 and 901 dpa. The trajectory in document shows requirements of 480, 543 and 970 dpa (once buffers and previous shortfalls are included).
- 2.6 Strategic Policy 37 should be clarified so that the actual annual requirements are (although we object to the 'stepped trajectory') stated.
- 2.7 Assuming that the trajectory (and annual requirements) shown in document HDC03 Appendix 1 are accurate, this shows a total supply of 13,412 homes against a total requirement figure of 13,376 homes. That overall supply exceeds the overall (minimum) requirement by a mere **36 homes over the entire plan-period**.
- 2.8 It is unclear from the Council's evidence base what 'capacity' the SNOWS offsetting mechanism will provide and whether there is opportunity for more capacity to be achieved, thus presenting opportunity for the Council to deliver a higher number of dwellings than currently proposed. Equally, it is unclear how / whether the Council has given proper consideration to the ability of other offsetting schemes (as allowed

for in Strategic Policy 9) to deliver additional development. This is fundamentally concerning when water neutrality is relied upon to suppress the requirement.

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?

2.9 Paragraph 11b of the Framework states that:

“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect area or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

2.10 The ‘tests of soundness’ at paragraph 35 of the Framework require, amongst other points that plans be positively prepared, meaning that:

“a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.”

2.11 HDC acknowledge paragraph 4.3 of Topic Paper 1 – The Spatial Strategy (September 2024) that CBC will have a total unmet need of 7,505 dwellings over its plan period. Paragraph 7.15 states that the preferred strategy approach taken results in “*very limited availability to provide for the unmet needs of neighbouring authorities.*” The reason for this is stated that “*Whilst this strategy has been pursued, it is in the context of the legal requirements placed upon the authority to ensure no adverse impacts on the Arun Valley sites.*”

2.12 Not only does the Local Housing Need result in a minimum requirement, the Framework at paragraph 61 states:

“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

2.13 It appears that the Council has decided that they are unable to meet their need in full due to the absence of a mitigation strategy to address a suggested impact on the Arun Valley SAC. Notwithstanding this, once the SNOWs is in operation, and mitigation has been introduced, there is no reason why development should be delayed or restricted as the SNOWs should allow for sufficient capacity to address this.

c) With reference to evidence, are the stepped annual requirements justified (in principle and scale of the step)?

- 2.14 Paragraph 10.27 within the submission Local Plan identifies that the Council “*will be reliant on a high number of homes which are to be delivered through the allocation of larger strategic sites*” and accepts that these larger sites will take time to come forward (i.e. through the planning process and early delivery stages).
- 2.15 This is not a justification for a stepped trajectory, but the consequence of the delivery expectations associated with the sites selected by the Council. The housing requirement should not be stepped (as the Council has not presented any evidence to justify that being appropriate or necessary).
- 2.16 The Council’s updated housing trajectory (September 2024) proposes a housing target of 480 in 2023 – 2025, 436 dpa in the next five years of the Plan (then increased by 20% buffer of 87 and 20 dwellings to address a previous shortfall), the 950 dpa (increased by 20 dpa for previous shortfalls) for the remaining 12 years of the Plan. This approach has not been clearly justified.
- 2.17 The footnote to Strategic Policy 37 refers to the application of a 10% buffer in years 1 – 5. On the basis of document HDC03, we assume the Council considers this should be 20%.
- 2.18 The actual annual requirement is now unclear. Despite the content of HDC03 (which shows different requirements to the Policy), the Schedule of Main Modifications¹ has not been updated.
- 2.19 Strategic Policy 37 proposed a requirement (including an additional 10% buffer within years 1-5) of 480 dpa for the period 2023 – 2028. Document HDC03 and the updated trajectory now perpetuates this suppressed period of housing delivery until 2029/30.
- 2.20 Secondly, we note that towards the middle to end of plan period, the Council relies on larger sites to come forward. There is an extremely limited ‘oversupply’ buffer, which would be diminished by even a very small delay in delivery.
- 2.21 The remedy to these issues is that the Council should identify additional sites which are capable of being delivered earlier in the Plan-period.
- 2.22 The table below compares the proposed requirements against forecast delivery.

| Year | Strategic Policy 37 (as submitted) requirements / annum | Revised requirement in HDC03 | Forecast Delivery shown in HDC03 |
|-------------|--|-------------------------------------|---|
| 2025/26 | 480 (including a 10% buffer) | 436 dpa | 537 |
| 2026/27 | 480 (including a 10% buffer) | Buffer of 20% | 642 |
| 2027/28 | 480 (including a 10% buffer) | Allowance for | 646 |
| 2028/29 | 901 | previous | 712 |
| 2029/30 | 901 | undersupply: 20 dpa | 640 |

¹ Document SD14

| | | | |
|---------|------|------------------|-----------------------------------|
| | | Overall: 543 dpa | |
| Overall | 3242 | Overall | 3177 (i.e. below the requirement) |

- 2.23 If the LPA is confident that its forecast housing supply figures are accurate, it seems odd that the requirement² would be set so far below that level.
- 2.24 The stepped trajectory only appears to serve one purpose if the forecast supply figures are accurate: it allows HDC to claim that supply exceeds the requirement and so assisting claims that it would be able to maintain a five-year supply (see the calculation at paragraph 5.12 of document HDC03).

d) Is the approach to the shortfall (the Liverpool method) justified?

- 2.25 No.
- 2.26 The use of the Liverpool method to the shortfall simply delays the provision of housing, with the most severe consequences felt by those in need of affordable housing.

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?

- 2.27 The Crawley Borough Local Plan was adopted on 16 October 2024. The Inspectors concluded that the Plan-period should be extended (to cover the period 2023 to 2024) and stated:

*“110. As a consequence of clarifying the plan period the **extent of unmet housing need would increase from 7,050 to 7,505 dwellings**”*

- 2.28 Whilst the submission Local Plan therefore records the unmet need figure as being 7,050 dwellings, that should be updated to refer to 7,505 dwellings between 2023 – 2040 (this is proposed in HDC’s main modifications, ref HM045).

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?

- 2.29 Yes, there is such evidence, and yes, it would be sound to do so.
- 2.30 It is clear that these unmet needs from Crawley are not being addressed elsewhere. Horsham District has a clear functional relationship with the town.
- 2.31 Having recognised that unmet housing needs exist in neighbouring areas, due consideration of the benefits, compared to adverse impacts of accommodating those needs is necessary.

² Whether taken from the submission Local Plan or HDC03

- 2.32 HDC seem to have artificially limited (see other responses) the ability of the District to accommodate those needs and so, in our view, has not presented an accurate representation of the soundness and sustainability of doing so.
- 2.33 Accommodating these unmet needs would mean that the Plan is 'positively prepared' (meeting as a minimum, the objectively assessed needs of the area, so that unmet need from neighbouring areas is accommodated), 'justified, effective (particularly through joint working on cross-boundary strategic matters that have been dealt with rather than deferred) and 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?

- 2.34 No.
- 2.35 The site at Land at Dunstons (ref. SA634) was included as part of the Regulation 18 Plan and was assessed as part of the Council's Regulation 18 Site Assessment Report (January 2020). The site was allocated a RAG rating of 'unfavourable impact (with potential for mitigation). The Council noted that the site would not be suitable if it was to come forward in isolation as it would *"lead to isolated development away from the existing settlement boundary."*
- 2.36 The Council noted that the site presented opportunity to deliver comprehensive development alongside the adjacent SA433 site which does abut the Built Up Area Boundary of Partridge Green. The assessment concludes that the Council considered the site could deliver 110 dwellings as part of a comprehensive development alongside site SA433. The Council subsequently allocated site SA634 as part of the Regulation 18 Plan (Policies Map 15 – Partridge Green).
- 2.37 The site was then assessed in the Council's Regulation 19 Site Assessment Report (Part D: Sites not identified for Potential Allocation for Housing Development) which concluded that *"The site in isolation is considered to be detached from the main body of the village and not suitable for allocation. SA637 would have to be part of a comprehensive proposal with SA433 in order for this reason to be reconsidered."* [we note that HDC incorrectly refer to site 637].
- 2.38 However, the Council contradict themselves by stating *"Furthermore, a comprehensive scheme comprising of SA634 and SA433 would be seen to extend the settlement form into the open countryside along Shermanbury Road in a somewhat detached extension of the settlement."*
- 2.39 As Regulation 18 stage, the Council accepted that comprehensive development of both SA433 and SA634 could come forward as part of a comprehensive development, but then at Regulation 19 stage decided that the development of both sites comprehensively would consider the development of both sites together to represent a detached extension of the settlement.

- 2.40 It is not clear why the site at Land at Dunstons (ref. SA634) has not remained an allocation when the Council accepted at Regulation 18 stage that comprehensive development of both sites would be appropriate. BDWHSC notes that SA433 has remained as an allocation in the submission Local Plan.

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?

- 2.41 No. BDWSC consider the revised housing trajectory (September 2024) should be appended to the Local Plan, because it provides more information and enables the reader to understand what sites are expected to contribute at various stages of the plan period.

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?

- 2.42 BDWHSC notes that the Council has stated in the submission plan that they anticipate 1,680 dwellings to be delivered through windfall sites. The Council's updated housing trajectory (September 2024) identifies a figure of 1,440 dwellings to be delivered through windfall sites.
- 2.43 The Council's buffer is **36 dwellings** between their identified supply figure and the anticipated target figure. The small buffer is concerning when considered in context of the significant housing figure that the Council anticipate will be delivered through windfall sites.
- 2.44 1,680 dwellings represents 12.5% of the Council's total supply, and 1,440 dwellings represents 10.7%. These are both considerable figures to rely upon for sites that the Council are not yet aware of coming forward.
- 2.45 Table 2 (Windfall completions from small/medium and large sites) within the Council's Windfall Study - January 2024 (H09) highlights that a significant number of dwellings have been delivered previously through windfall sites. As this has been the case previously, it is likely that sources of windfall supply within the district will reduce, therefore it is considered unreasonable to assume that 120 dwellings per annum will be delivered over the plan period.

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?

- 2.46 The revised trajectory in HDC03 indicates the supply of 3,177 dwellings between 2025 – 2030. HDC identifies the requirement for 436 dpa. As we have discussed, if the LPA is confident that its forecast housing supply figures are accurate, it seems odd that the requirement (whether taken from the submission Local Plan or HDC03) would be set so far below that level.

- 2.47 We have already discussed our general objections to the ‘stepped trajectory’ and as such consider that the requirement in the first five years (post adoption) should be increased.
- 2.48 The trajectory accompanying document HDC03 appears to apply the ‘buffer’ incorrectly before previous shortfalls are identified. In our view the buffer should be applied after the shortfall.
- 2.49 The following tables shows our view of the supply position (for 2025 – 2030), assuming that the Council’s forecast delivery rates are reliable, and without any adjustment (despite our concerns in that regard) to the annual requirement (this table shows the ‘Sedgefield’ and ‘Liverpool’ approaches to undersupply).

| | Sedgefield | Liverpool |
|---|-------------------------------|-------------------------------|
| Baseline requirement 2025 – 2030 | 436 dpa 2180 (2025 – 2030) | 436 dpa 2180 (2025 – 2030) |
| Accrued shortfall to 2025 | 300 (as per HDC03) | 300 (as per HDC03) |
| Baseline requirement 2025 – 2030 (plus accrued shortfall) | 2480 | 2280 |
| Requirement including a 20% buffer | 2976 (as per HDC03) | 2736 |
| Annualised requirement | 596 (rounded from 595.2) | 548 (rounded from 547.2) |
| HDC’s forecast supply | 3186 (as per HDC03) | 3186 (as per HDC03) |
| Five-year supply position | 5.35 | 5.82 ³ |

- 2.50 The following table demonstrates the position, if the LPA’s forecast supply (2025 – 2030) is accurate, and applies that as the annual requirement (using the same principles as above), rather than artificially suppressing the requirement:

| | Sedgefield | Liverpool |
|---|----------------------------|----------------------------|
| Baseline requirement 2025 – 2030 | 3177 (2025 – 2030) | 3177 (2025 – 2030) |
| Accrued shortfall to 2025 | 300 (as per HDC03) | 300 (as per HDC03) |
| Baseline requirement 2025 – 2030 (plus accrued shortfall) | 3477 | 3277 |
| Requirement including a 20% buffer | 4173 (rounded from 4172.4) | 3933 (rounded from 3932.4) |
| Annualised requirement | 835 (rounded from 834.6) | 787 (rounded from 786.6) |
| HDC’s forecast supply | 3186 (as per HDC03) | 3186 (as per HDC03) |
| Five-year supply position | 3.8 | 4 |

³ This differs from the Council’s calculation in HDC03 as the buffer is applied after the shortfall

- 2.51 We reiterate our view that the annual requirement for 2025 – 2030 has been suppressed in an attempt to demonstrate a 5YHLS.
- 2.52 Beside the evidence in HDC03, HDC does not appear to have presented details to enable a full and thorough analysis of deliverability during that five-year period. Given the fragile nature of the supply position, that is concerning.

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?

- 2.53 HDC03 indicates 5,742 dwellings delivered in years 6 – 10 (2030 – 2035) and 3842 (in years 11 – 15).
- 2.54 HDC03 includes a list of the developers contacted by HDC (to establish projected delivery rates), listing 71 sites). Appendix 3 lists 27 responses (as well as 3 received confidentially). If this is the latest evidence on deliverability which the Council relies on, we note with concern that it relates to fewer than half the sites in Appendix 2.

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?

- 2.55 No comment.

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?

- 2.56 The Approved Document is clear that a condition must be applied. The Council need to note this and ensure it is carried forward, this policy alone does not appear to be sufficient to enforce this on future schemes.
- 2.57 The Council are not clear what they require in relation to Part M4(3). The Approved Document sets out the potential for two requirements. The Council needs to provide this level of clarity.
- 2.58 The requirement for all homes to meet Part M4(2) has not been fully considered by the Council (and is not considered properly by any Council), as the increase in width of parking spaces has a significant impact upon the ability to meet parking standards or to meet higher density developments.

Turley Reading
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830