

## 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 8 - Issues 1,2 and 3

### **Matter 8, 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 It is clear how the figure has been calculated, but Reside does not believe the local housing need proposed is justified.
- 2.2 As set out in our Regulation 19 representations, this represents a shortfall of 2,275 (14%) of the Standard Method Figure and provides for less housing than the adopted HDPF and falls below the lowest growth option consulted on at Regulation 18. This is not justified and unsound.

*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?*
- 2.3 No, it is not believed the overall housing requirement is justified and it is not considered there are any benefits to not providing the objectively assessed housing need. There are plenty of suitable sites available to the council, so this can be met. The main constraint identified for the Council not meeting its need is water neutrality. This will be discussed in detail in our relevant hearing statement, but in summary, this approach is flawed in light of the potential changes to water neutrality during the plan period.
- 2.4 HDC, like Crawley Borough Council, should be basing their housing target on land supply rather than water capacity, which would allow for Southern Water to plan appropriately for growth, and therefore removing the barrier to providing the full objectively assessed need. This policy should not presuppose that water neutrality cannot be resolved or suitably mitigated for the objectively assessed housing need.
- 2.5 In addition, as we set out in our original statement, there should be a separate policy, or an addition to policy SP3, that allows sites to come forward where they meet general planning requirements, are located adjacent to the settlement boundary and can achieve water

neutrality. Even if the council were meeting its housing need, such an approach would not be harmful, as the housing requirements are a minimum figure.

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

- 2.6 For the reasons set out elsewhere in this statement, we do not believe the evidence exists to support a stepped delivery of housing. We believe the supply of sites exists to deliver the housing required in all three five-year periods. SNOWS is also in place to deliver the necessary water neutrality mitigation and therefore the full housing supply should be met/delivered.

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

- 2.7 No. There are water neutrality mitigation solutions coming forward and the Liverpool method has been chosen, in our opinion, to just reduce delivery in the early years of the plan. We have set out elsewhere in our statements that we believe there are options and opportunities to deliver further housing. As such, this needs to be thorough explored.
- 2.8 At this stage, sufficient evidence has not been submitted to show that the sites required to meet the need cannot be delivered either in total or in the first five years and the case for using the Liverpool method has therefore not been established.

*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?*

- 2.9 Yes – as stated the only constraint identified within the District is water neutrality. Horsham has sufficient land to allocate its full housing need and help contribute further to the unmet housing need in the housing market area. The plan should not be presupposing that the water neutrality mitigation needs cannot be met/delivered.

*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?*

- 2.10 Yes, as per our Regulation 19 representations, the further unmet needs can be met through sites with bespoke water neutrality schemes that could come forward within the short to medium term whilst the Council's SNOWs scheme comes fully online and the proposed large allocations come forward. Reside controls land that could deliver some 500 homes in the most sustainable settlements that can help to support this delivery.

*Q4. Should Strategic Policy 37: Housing Provision also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development in line with paragraph 66 of the NPPF?*

- 2.11 Yes – as currently drafted it leaves the amount of housing per Neighbourhood Plan unanswered. Clear direction will help assist the production of effective Neighbourhood Plans that help with the Council's housing delivery long term. We strongly believe that without this direction, NPs will not come forward with sufficient housing which will undermine the housing delivery in Horsham.
- 2.12 We have seen/experienced this elsewhere in the country where NPs have been left to their own devices and failed to support the housing delivery required and set out. It is too high a

risk to leave this to chance and makes the monitoring and management of housing delivery too uncertain and therefore unsound.

**Matter 8, 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?*

- 2.13 We believe this is a question of the council in the first instance, but wish to reserve the right to respond to the council's answers. However, overall, we believe the site selections has been too narrow and opportunities missed. This is having a serious knock-on effect on the delivery and soundness of the 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?*

- 2.14 No Comment.

*Q3. The Plan does not appear to provide land to accommodate at least 10% of the housing requirement on sites no larger than one hectare as required paragraph 69 a) of the NPPF, why?*

- 2.15 Reside note the Council's proposed modification on this matter and that small sites would be considered positively where they meet the criteria of the plan. But we do not agree that the rural nature of the District is a reason why not to allocate 10% on sites of less than 1ha. This Plan as submitted does allocates sites smaller than 1ha, demonstrating that such sites do exist.

*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?*

- 2.16 No comment

*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?*

- 2.17 We wish to wait to see the council's response and supporting evidence before responding and therefore reserve the right to respond further once this is available.

*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?*

- 2.18 We believe this is a question for the council in the first instance, but wish to retain the right to respond to the council's answers.

*Q7. Is the Council's approach to self-build and custom-built housing consistent with national policy? Is it clear how much of this type of housing will contribute to the overall housing land supply? Where is this addressed in the evidence?*

2.19 No Comment.

**Matter 8, 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?*

2.20 Reside question, given the failure of the plan to meet its objectively assessed needs to full, how it will meet the identified local housing needs. Given it is not proposing to meet its full needs, Reside believes this policy is not Sound.

*Q2. Is Strategic Policy 39: Affordable Housing sound?*

*a) Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?*

2.21 No, as set out in our representations on the matter, the Council are seeking a significantly higher proportion of Affordable Housing in relation to Neighbouring Authorities (Crawley Borough Council and Mid Sussex District Council). It is not considered there is enough evidence to justify this.

2.22 The requirement for 45% on green field non-strategic sites, plus other requirements such as Water Neutrality and BNG could risk valuable delivery of housing on small to medium sized sites. There is not sufficient evidence that the plan has included water neutrality in its viability assessment and so further supports that 45% is not justified or viable.

*b) Is the approach to First Homes consistent with national policy?*

2.23 As set out in our Regulation 19 representations exceeding the discount applied to First Homes will likely reduce the number delivered.

*c) Is criterion 5 effective?*

2.24 No comment

*d) Would the needs identified be met?*

2.25 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?*

2.26 No Comment.

*b) In line with the PPG2, what is the evidence which establishes the need for internal space standards in the District?*

2.27 No Comment.

*Q4. Is Policy 41: Rural Exception Homes sound?*

a) *Is it clear what is meant by “In exceptional circumstances” and “small scale”?*

2.28 No Comment.

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

2.29 No Comment.

*Q6. Is Policy 44: Rural Workers Accommodation sound?*

2.30 No Comment.

*Q7. Is Policy 45: Replacement Dwellings and House Extensions in the Countryside sound?*

2.31 No Comment.

*Q8. Is Policy 46: Ancillary Accommodation sound?*

2.32 No Comment.