

Client	Welbeck Strategic Land IV – Bucks Green, Rudgwick		
Project	Horsham Local Plan		
Document	Hearing Statement – Matter 8	Revision	A
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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?

Paragraph 60 of the NPPF (September 2023) states that “*To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*”

The submission plan acknowledges this in the first bullet point in Chapter 10, noting “*The Government is seeking to deliver a step change in housing growth. This means that the District’s population will continue to rise over the next 20 years. There is a need to ensure that everyone can access good quality housing to meet the needs of a mixed population and support the economy.*”

The local plan notes at Paragraph 10.4 that “*The standard methodology calculation for Horsham District in 2023 is calculated as 911 dwellings per annum. This is equivalent to providing a minimum of 15,487 homes in the 17-year period between 2023 and 2040.*” However, the submission plan proposes to deliver only 13,212 over the period at an average rate of 777 homes per year. This is a shortfall of 2,275 homes over the plan period.

The local plan therefore fundamentally fails to deliver the objective to significantly boost the supply of homes, failing the test of soundness.

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?

The proposed under-delivery of some 2,275 homes compared to the OAN for Horsham would be detrimental to the governments overall stated aim of significantly boosting the supply of housing. This level of under-delivery is exacerbated by both the failure to contribute to any unmet housing need in the neighbouring and nearby authorities and the emerging national planning policy changes which indicate that there is an even higher housing need within Horsham. The proposed revised standard method calculates a need in Horsham for 1,294 dwellings per year.

The failure to meet its OAN over the plan period will not address ongoing and significant issues relating to the affordability of housing. The Northern West Sussex Strategic Housing Market Assessment (submitted as part of the Council’s evidence base) notes that house prices in Horsham were some 13.9 times higher than median earnings in 2018. This was the highest level in the area covered by the assessment and higher than the south east average. This situation has only worsened following the supply issues resulting from water neutrality delays.

The number of affordable units being delivered in Horsham is also constrained by a failure to deliver overall housing numbers. The inability to access housing has significant adverse impacts on social housing waiting lists with corresponding impacts on the economy, poverty and public health.

The government is committed to delivering 1.5 million homes over the course of this parliament. A local plan which does not come close to providing for its OAN is not justified given the range of adverse impacts caused by an inadequate supply of housing.

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

HDC has justified the stepped trajectory given its reliance on the allocation of larger strategic sites. The delivery of 480 homes per annum for the first 5 years of the Plan is unacceptable in the current national and local housing context, particularly as HDC's latest Annual Monitoring Report (AMR) shows only 2.9 years housing land supply.

It is noted that the matter of water neutrality has severely curtailed the delivery of housing in Horsham since the Natural England position statement was issued in 2021. However, this makes it even more important to deliver houses in the first five years of the plan to help make up for the shortfall and begin to address the significant need for all types of housing, particularly affordable.

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

The Liverpool method is not considered justified given the impact on housing delivery in the District resulting from water neutrality. 'Topic Paper 1 – The Spatial Strategy' prepared by HDC highlights the rapid decline in housing delivery following the issuance of the NE Position Statement. Figure 1 of that document shows housing delivery dropping from 955 dpa in 2019/20 to 396 in 2022/23 and 420 in 2023/24.

This is an unusual rapid decline which needs to be addressed quickly, rather than across the plan period as per the Liverpool method. The consequences of not addressing this decline will be further rapid increases to the number of households on the Council's housing register.

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?

HDC is seeking a significant reduction in housing numbers following the publication of the Natural England Position Statement in September 2021. Paragraph 10.5 of the submission plan states: *"The level of development the District is able to accommodate (including the Council's ability to meet its own housing target) has changed over the course of the preparation of this Plan as a result of the requirement for water neutrality, which has significantly impacted on Horsham District's ability to accommodate unmet housing needs from other District's and borough's at the current time."*

On this basis, HDC states it is not possible to meet its OAN and is therefore also currently unable to contribute to meeting Crawley's unmet housing needs and those of other nearby authorities under the Duty to Cooperate (DtC).

The significant shortfall of dwellings, since the 2021 Regulation 19 plan and the current submission Local Plan is set out in table 1 below:

Horsham District Draft Local Plan Versions	Objectively Assessed Housing Need (dwellings per annum)		Duty to Co-Operate (dwellings per annum)		Housing Target (dwellings per annum)	
July 2021 (Regulation 19 plan)	897		203		1100	
January (Regulation 19) and Submission 2024	911		0		777	
Change over Plan Preparation Period	Increased OAN:	14 dpa	Unmet Need outside of District:	203 dpa	Housing Shortfall:	323 dpa

Table 1- Comparison of Draft Local Plan Regulation 19 Housing Figures July 2021 vs January 2024

This reduction in housing provision is not appropriate, given the substantial housing need within the local and wider area, and HDC should not be reducing their housing need figure, but increasing it to at least 1,14dpa to meet the OAN and the unmet need of neighbouring Districts.

Horsham is relatively unconstrained compared to neighbouring authorities and should be working with them to deliver unmet housing need.

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

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?

The plan does not do anywhere near enough to meet its housing need requirement. HDC should be investigating alternative strategies to housing delivery, including delivering a high percentage of smaller sites ‘to ensure that no stone is left unturned’ as required by Paragraph 10 (Ref ID: 3-010-20190722) of the PPG, which states that ‘*plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible*’ and meet as much of the identified housing need as possible, in line with Paragraph 60 of NPPF.

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?

The rate of 777dpa includes a 10% buffer within years 1-5. Paragraph 74 c) of the NPPF states that a buffer of 20% should be included “*where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply*”. The impacts of water neutrality over the past few years are articulated in the HDC Topic Paper 1 – The Spatial Strategy which shows a consistent under delivery for the past four years. A 20% buffer should therefore be applied to the housing target.