

Horsham Local Plan EIP

Hearing Statement: Matter 8

Harlequin New Homes Ltd

34644

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1 MATTER 8: HOUSING

1.1 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of Harlequin New Homes Limited in response to the examination of the Horsham District Local Plan 2023-2040.

1.1.1 Harlequin New Homes Limited have entered into an Option Agreement for 'Land off Church Street, Rudgwick' (SHELAA Ref SA442) and are promoting the Site for allocation as part of the Horsham emerging Local Plan process, with a suggested capacity for approximately 35 dwellings. It is understood that the Inspector does not wish to consider the soundness of omission sites, and therefore this Hearing Statement focuses only on the matters of soundness in respect of the submitted Local Plan and in direct response to the Inspector's Matters, Issues and Questions.

1.2 ISSUE 1: WHETHER THE HOUSING REQUIREMENT IS JUSTIFIED, EFFECTIVE, CONSISTENT WITH NATIONAL POLICY AND POSITIVELY PREPARED?

Question 1

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?

1.2.1 No. The Council have acknowledged that the reasons for not meeting this need are based upon the limited supply of sites and the lack of water supply within the area. Whilst the issues with regard to adhering to the requirements of the Conservation of Habitats and Species Regulations 2017 are understood, there is no sound basis to use this as a reason to plan to not meet housing need. Mitigation measures will need to be found in the short and longer term, and the Local Plan should be planning to provide the housing which is much needed when the water neutrality issue has a positive resolution.

1.2.2 We are therefore of the view that the Council have failed to fully consider other, appropriate sites that can assist with both the immediate and more strategic housing need.

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?

- 1.2.3 No, the overall housing requirement is not justified. It is not considered that the Council has provided sufficient justification for not meeting the local housing need in full, particularly given that omission sites exist which are capable of being allocated.

Question 2

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?

Yes. At the time of the Regulation 19 consultation there was very limited information with regard to the matter of addressing unmet housing need. The NW Sussex HMA SoCG provided an assessment of unmet need, dated back to March 2018 and uses the previous Objectively Assessed Need (OAN) figures, set against the Local Plan period housing supply at the time. This identified a significant undersupply of 5,025 dwellings to 2031 within Crawley. However, as acknowledged within the SoCG, these figures, some six years old now, relate to the OANs which have now been superseded by the Standard Method for assessing Local Housing Need. A new SoCG was published in July 2024 and this identified that the overall need across the HMA has increased by 510 dpa on the basis of the Standard Method. The Standard Method was introduced six years ago in 2018. It should have formed the basis of the consideration of unmet needs at the outset of the plan making process in Horsham. The very significant levels of unmet need in the North West Sussex Housing Market Area is a cause for alarm, and main modifications should be required to explore how HDC can help meet this significant unmet need.

Question 3

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?

- 1.2.4 Yes. Indeed, the unmet need across Sussex and surrounding areas is only increasing, most notably along the coastal authorities. Worthing Borough Council, for instance, have very recently adopted a Local Plan with a very significant shortfall of 10,488 homes across the plan period. This shortfall has to be met, otherwise this will result in a very significant level of unmet housing need in West Sussex. In terms of East Sussex, neither Lewes, Rother nor Wealden District councils can demonstrate a five-year housing land supply. None have local plans coming forward and therefore is a very significant level of unmet housing need across East Sussex.
- 1.2.5 The critical need in Crawley has most recently been laid clear in an unprecedented admission from the leader of Crawley Borough Council that the Council may

declare a housing emergency (BBC, 21st February 2024), a move which was ratified by CBC's Full Council on 21st February 2024.

- 1.2.6 It is relevant to note that HDC is an unconstrained authority in relevant terms. It has no Green Belt, and only a small area of AONB. It is not constrained geographically, unlike Crawley, nor by the coast, unlike the neighbouring and nearby coastal Sussex authorities. HDC's own evidence points to a very significant unmet need within its own boundaries and within the wider Northern Sussex HMA (and further afield) and in the midst of an ongoing housing crisis, highlighted only very recently by CBC's declaration of a housing emergency, this is simply unacceptable. HDC must look to meet its needs, plus an appropriate proportion of the very clearly identified unmet needs from elsewhere.

Question 4

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?

- 1.2.7 Yes. The NPPF is clear on this at paragraph 67. In the absence of such clarity, it will be very difficult for Neighbourhood Plan groups to progress their plans with any significant degree of certainty with regard to their individual housing requirements.

1.3 ISSUE 2: WHETHER THE OVERALL HOUSING LAND SUPPLY AND SITE SELECTION PROCESS IS JUSTIFIED, EFFECTIVE, CONSISTENT WITH NATIONAL POLICY AND POSITIVELY PREPARED?

Question 1

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?

- 1.3.1 No, evident by the exclusion of an omission site in Rudgwick (SA442) based on a flawed Sustainability Appraisal process. In terms of the correct process for the content of the Sustainability Appraisal (SA), the Planning Practice Guidance (PPG, Paragraph: 018 Reference ID: 11-018-20140306) requires that the SA needs to "provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives".
- 1.3.2 It is our view that the SA provides insufficient explanation of the conclusions reached and the reasons why the growth strategy for the plan was selected and other options rejected. This is not clear and is therefore not effective nor in line with the statutory requirements of the SA.

- 1.3.3 The omission site had enjoyed a draft allocation with an indicative capacity of 15 dwellings at the Regulation 18 stage. The December 2023 version of the Sustainability Appraisal stated that the Submission Site (SA442) is *"not considered suitable for development because of the impact of the site on the wider landscape and the potential negative impact on the setting of local heritage assets adjacent to the site."*
- 1.3.4 It is notable that there is no material change between the July 2021 SA and the December 2023 update. The decision to de-allocate the site is therefore not backed up by any technical analysis of sustainability and appears to therefore have been a political decision. Such a move is perverse in the context of a Local Plan which severely fails to meet housing need both in terms of HDC's Local Housing Need and defined unmet need from neighbouring authorities.
- 1.3.5 In light of the above observations, we have significant concerns with the conclusions of the SA and strongly advocate for the revision of the assessment of Site SA442, on the basis that it is comparable in sustainability terms to the other identified sites and would be a suitable site for residential development to meet some of the unmet housing needs identified for HDC and neighbouring districts.