

Horsham District Local Plan 2023-2040 Examination

Our ref 61647/02/MS/HBe
Date 21 November 2024
From Lichfields obo Berkeley Strategic Land Limited

Subject Matter 10: Monitoring and Review

This Hearing Statement has been submitted by Berkeley Strategic Land Limited ('Berkeley'); promoting the 'Land North West of Southwater' (HA3) 'Strategic Site' for around 1,000 homes.

Appendix 1 to Berkeley's Matter 1 statement sets out a Table of Modifications as proposed within Berkeley's submitted Hearing Statements (Matters 1 to 10).

1.0 **Issue 1 – Whether the Plan would be able to be monitored effectively to ensure timely delivery and trigger the need for review?**

Q1. How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to progress?

1.1 No comment.

Q2. How would the implementation of the Plan be monitored? Would it be effective? How would the results of any monitoring be acted upon? What would trigger a review of the Plan or specific policies within it? Are main modifications needed to the Plan to reflect this?

1.2 **Berkeley objects** on the basis that the plan does not have a monitoring or review policy and is therefore not positively prepared or effective (NPPF paragraph 35a & 35c).

1.3 In light of the water neutrality issue – which is an evolving matter that requires ongoing monitoring – the Council has prepared a plan that does not meet its housing needs in full (as discussed in our Matter 1 and Matter 2 statements). To ensure the plan is positively prepared and effective in this situation, a suitably worded policy should be included in the plan whereby a review of the plan would be necessary were demonstrating water neutrality no longer required – for whatever reason – ahead of the usual five-year period to undertake such a review (noting that it is expected that the issue will be resolved well within the plan period). This would include a specific reference to working with the district's neighbouring authorities that form the Northern West Sussex Housing Market Area (i.e. Mid-Sussex and Crawley) in order to seek to address current unmet housing needs.

- 1.4 Notwithstanding, were the draft NPPF (published 30 July¹) adopted as written, the Council would – owing to its proposed requirement and in accordance with paragraph 226c and 227 of said draft NPPF – need to undertake a review of its plan at the earliest opportunity.

Q3. Overall does the Plan deal adequately with uncertainty?

- 1.5 No, **Berkeley objects** on the basis there is not a suitable monitoring policy as per our response to Q2. Introducing such a policy would overcome Berkeley's objection.

Word Count: 249

¹ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>