



Horsham District Plan 2021 -2039 Examination

Matter 8 – Housing

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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?

- 1.1.1** No, the requirement is not justified. It is considered that water neutrality has had an overbearing influence on the preparation of both the Horsham Local Plan and delivery of identified housing needs, without an effective mechanism to review the position of water neutrality mitigation requirements and their delivery should the emerging Sussex North Water Offsetting Strategy (SNOWS) come forward in different timescales than expected, or in a worse scenario not at all.
- 1.1.2** We do not dispute the fact the requirement for new homes to be water neutral has impacted on delivery of new homes, but this does not mean that the Council cannot meet needs in full over the plan period, nor additionally established unmet needs from its neighbouring authorities such as Crawley in the latter part of the plan period.
- 1.1.3** We would also suggest that the Council will need to include a strong review policy within the local plan due to anticipated changes to national policy. The proposed standard method would see Horsham's housing needs increase from 917 dpa to 1,294 dpa and will require the council to prepare a new plan immediately.
- 1.1.4** Within the new NPPF, a range of proposed transitional arrangements are outlined intended to facilitate the meeting of higher housing requirements without stagnating the plan-making process. Annex 1 states that policies of the Framework will apply for the purposes of preparing a Local Plan from the publication date plus one month, unless the local plan has been sub-mitted for examination before the publication date plus one month. However, where this applies, Local Plans that reach adoption with annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will

be expected to commence plan-making in the new system at the earliest opportunity to address the shortfall in housing need.

- 1.1.5 As such, Gladman recommend an immediate review of the Local Plan Update to ensure that the new housing need figure is accommodated as soon as possible. Gladman recommends the following policy wording is inserted into the plan to ensure that the plan remains up to date and in line with national policy. The following word is suggested below:

Policy XX: Reviewing the Local Plan Update

The Council will undertake an immediate review of the Local Plan Update. An updated plan will be submitted for examination no later than 30 months after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies relating to the supply of land will be deemed out of date in accordance with paragraph 11d) of the National Planning Policy Framework. The reviewed plan will secure levels of growth that accord with the Standard Method and any growth deals that have been agreed.

- 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?

- 1.1.6 There is a real pressing need for housing in Horsham, as evidenced by an identified 500 affordable dwelling requirement per annum and an affordability ratio of 13.6 across the district. This is in addition to the same figures of 739 and 8.9 in Crawley where there is an established unmet need of over 7,500 dwellings.

- 1.1.7 In addition to the worsening social impacts expected, it is anticipated that significant economic benefits would be lost.

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

- 1.1.8 The PPG accepts that there are circumstances where a stepped trajectory could be considered appropriate and it is therefore for the Council to present evidence to justify such an approach¹.
- 1.1.9 Gladman disagree with the use of a stepped trajectory in this instance as the Council are not proposing to meet housing needs in full. A greater level of housing will need to be introduced in to overall requirement for the stepped requirement to be justified.

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?

- 1.1.10 The Crawley Borough Local Plan was adopted in October 2024, containing an identified unmet need of over 7,500 dwellings. This figure has been quantified from early during the local plan process and it is only the issue of water neutrality that has led to the Council stepping back on providing any support to Crawley in delivery of their unmet needs.
- 1.1.11 Within the 15 year plan horizon it can be expected that solutions will materialise in addition to SNOWS that would enable the delivery of housing and the pent up demand currently stalled by a lack of strategic mitigation solution.
- 1.1.12 In line with Paragraph 69 of the Framework, which does not require for all sites to be identified for years 10-15 of the plan period, nor even for years 6-10 in the same level as years 1-5 an agreed contribution could be included in the overall housing requirement where a contribution could be made to unmet housing needs of the sub-area where the strategic mitigation required could be delivered or even if the situation around water neutrality lessens homes could be delivered much more quickly than starting the process of looking at that stage.
- 1.1.13 In the interim to a strategic solution, sites, developers and promoters are capable of providing their own bespoke solutions on a case by case basis and such an approach should be supported and an additional risk taken out of that process by an agreed contribution to Crawley's unmet needs set out in this local plan.

¹ PPG reference ID: 68-021-20190722