



Homes
England

Horsham District Local Plan 2023-2040 Examination in Public

Matter 1 - Legal and Procedural Requirements

Hearing Statement

Date: November 2024



Issue 1: Whether the Council has complied with the duty to co-operate in the preparation of the Plan?

1. Introduction

- 1.1 This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site HA2 in the Horsham Local Plan 2023-2040.
- 1.2 This statement supplements Homes England's previous representations to the Horsham District Local Plan Regulation 19 consultation. Where relevant, separate submissions will be made in relation to Homes England's other land interests.

2. Q3 What substantial concerns have been raised in terms of compliance with the duty to co-operate?

- 2.1 The inclusion of the Land West of Ifield and it being demonstrated as necessary to meet the future development needs of Horsham and wider North West Sussex Housing Market Area is supported by Homes England in the strongest possible terms.
- 2.2 The Northern West Sussex Strategic Housing Market Assessment (2019) provides that the standard method formula demonstrates a minimum local housing need of 965 dwellings per annum in Horsham. However, the Housing Delivery Study Update (2023) provides that the local housing need for Horsham is 911 homes per annum or 15,487 homes over the 17-year plan period of 2023-40.
- 2.3 The Statement of Common Ground between Crawley Borough Council (CBC) and Horsham District Council (HDC) outlines that *"housing need within Crawley has as of March 2024 been calculated through the Standard Method as totalling 739 dwellings per annum (dpa). However, the base Standard Method figure for evidence underpinning the Crawley Borough Local Plan at the point of the Plan's submission in July 2023 was 755 dpa (the figure in March 2023)"*.
- 2.4 The CBC / HDC Statement of Common Ground acknowledges that there are land constraints within Crawley which mean that over the Crawley Borough Local Plan period (2023-2040), there is an outstanding unmet need of 7,505 dwellings. This led

to CBC writing to HDC in January 2020 and in April 2023 to enquire whether it can assist in reducing this unmet housing need.

- 2.5 Applying the Standard Method formula for the three authorities within the Northern West Sussex Housing Market Area (HMA) (HDC, CBC and Mid Sussex District Council (MSDC)) demonstrates an increased need of 510 dwellings per annum compared to that established in their respective current adopted plans, an increase of approximately 18%.
- 2.6 The Northern West Sussex HMA Statement of Common Ground signed by HDC, CBC and MSDC recognises that there are various challenges which are making it increasingly difficult for each of the authorities to meet their own housing need before considering over-supply to meet the wider HMA needs. It also outlines how this has been compounded by water neutrality constraints that are impacting housing supply within Crawley in the short to medium term and Horsham across the new plan period. The Statement explains how the HMA did meet its need in full in 2018 however, now the HMA has an unmet need of 8,947 dwellings. HDC is now unable to meet its own housing need and as a result cannot assist with meeting CBC's unmet need despite a willingness on the part of both Council's to co-operate.
- 2.7 The Northern West Sussex HMA Statement of Common Ground concludes that the authorities housing need within the Northern West Sussex HMA will not be met by the emerging set of plans. As a result, it is agreed in the Statement that the authorities will continue to work together to identify options for increasing housing supply further, whilst recognising that there will continue to be an unmet need for housing in the HMA.
- 2.8 The importance of ensuring HDC has an up to date Local Plan that supports housing delivery and the need to work collaboratively across the sub-region has also recently been highlighted by CBC's declaration of a housing emergency (as reported to CBC's Full Council meeting on 21st February 2024), reiterating the need to work with neighbouring authorities and the Government to develop long-term solutions to address the national housing crisis.
- 2.9 It is therefore strongly welcomed that the draft Local Plan acknowledges Land at West of Ifield's unique position, both now and beyond the Local Plan period, to the extent that it is able to contribute to wider development needs not just those related to housing and sub-regional growth priorities – in particular the continued economic growth of the Gatwick Diamond and housing needs across the wider North West Sussex Housing Market Area.

2.10 In summary, the latest position and agreed approach going forward between HDC, CBC and MSDC is captured in the Northern West Sussex HMA SOCG. Homes England consider that the Duty to Co-operate has been satisfied on the basis of the information that has been reviewed.

3. Q4 How has the Council co-operated to establish and meet a housing need? How specifically have development constraints influenced that co-operation, particularly water neutrality?

3.1 Paragraph 10.12 of the Local Plan confirms HDC's position that due to water neutrality constraints, it is not possible to meet the Standard Housing Methodology housing target set for the administrative area, and contrary to the previous approach taken by HDC, it is, at this time, not able to contribute to meeting unmet housing needs for CBC, although this will be kept under review as and when water neutrality constraints ease.

3.2 As evidenced in the CBC / HDC Statement of Common Ground, the two local authorities have collaborated to seek to meet cross boundary housing needs now, albeit within the constraints of water neutrality and in the future. It is clear that both local authorities have been working together despite the water neutrality issues identified.

3.3 West of Ifield has been allocated with a capacity of 3,000 homes. However, as a result of the current water neutrality constraints and the reliance on SNOWS credits, the capacity to be delivered within the Local Plan period is identified as 1,600 homes. Homes England welcomes this approach as it allows for additional capacity to come forward within the Plan period in the event that a solution for water neutrality is identified either on site or at a strategic level. Furthermore, this could result in a positive contribution to housing supply in an area that has the potential to meet the housing needs of both HDC and CBC.

3.4 The Main Modification to this policy to introduce a blended housing mix is welcomed as this provides a flexible approach which means that both HDC and CBC's specific housing needs could be met in terms of the type of housing proposed.

3.5 The site-specific vision and objectives for the West of Ifield has been shaped through extensive and ongoing engagement between Homes England, HDC, CBC and West Sussex County Council as part of a formal Planning Performance Agreement (PPA) that has been in place since January 2020. This collaborative approach has ensured that

there has been a collective understanding of the opportunities and constraints across the site and the wider area and how the site can best meet development needs and mitigate any impacts, as well as ensure consistency across available evidence. Moreover, Homes England has ensured that the scheme is fully aligned and has been developed within the context of the joint PPA. This has meant that wider development needs within the two local authorities are met.