



Project	Eastlands Farm (SA052, SA747 and SA791)
Document	Horsham District Council Local Plan 2023-2040 Matter 8 Hearing Statement obo Hunter Group

Matter 8 – Housing

Matter 8, 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?

We maintain that the reduced housing requirement is unsound and the evidence base fails to adequately justify the council's reasoning for pursuing a reduced figure. The effects of Covid and Brexit had been taken into account in the 2021 version of the plan and had not justified a reduced housing target at the time. The current reduced figure is contrived by the council's wrongful assessment of water neutrality as an exceptional circumstance where we content it is merely a constraint for which mitigation has and can be 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?

The 2021 housing target (1,100 dwellings per annum) was deemed justified and sound by the council and which all other impacts could be mitigated; it is therefore clear that with water neutrality addressed the higher housing target is achievable and sound. It cannot therefore be argued that the impacts (for which mitigation can be secured) could be determined as being significantly and demonstrably outweighed by the benefit of meeting the district's housing need and that of neighbouring authorities.

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

With the allocation of smaller sites with bespoke water neutrality solutions, the stepped trajectory would not be necessary as these could be brought forward in the earlier part of the plan whilst there will be a delay in delivery of the larger strategic sites.

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

With the allocation of smaller sites with bespoke water neutrality solutions, the council would not need to rely on the Liverpool Method as the first five years of supply would be boosted by the pent up supply of smaller sites which are able to be swiftly delivered. In seeking to adopt the Liverpool Method, the council are failing to exploit every opportunity to address recent under delivery swiftly and are instead seeking to push the issue down the road.



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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?

Severe unmet need from neighbouring authorities both within and outside the housing market area (HMA) is evident through the recent Examinations for Crawley along with the coastal authorities of Adur Worthing and Brighton & Hove. For the coastal authorities, the only feasible option is to look to less constrained districts to the north, which includes Horsham. As previously stated, there are no showstoppers to Horsham being able to meet a significant element of this need through their plan, now that a water neutrality solution has been found.

Matter 8, Issue 2 – Whether the overall housing land supply and site selection process is justified, effective, consistent with national policy and positively prepared?

Q2. The NPPF at paragraph 74 states strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period? Is this achieved by Figure 6 of the Plan?

Figure 6 in the plan is insufficiently detailed and is clearly labelled as 'illustrative' further devaluing its worth.

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 council have recently published an updated Schedule of Suggested Modifications (MM) (version 2) (SD14) within which they are recommending an amendment (HM048) to the supporting test of policy 37 which suggests that the rural nature of the district '*with delivery heavily reliant on a small number of large sites*' is their justification for not meeting this requirement; the document also refers to 'evidence' which indicates they cannot deliver the 10% requirement on sites below 1ha. This amendment however rather than providing evidence to demonstrate the need cannot be met, further demonstrates that the existing *spatial strategy*, which is reliant on a small number of larger sites, is why smaller sites have not be allocated and not the nature of the district.

In addition, the MM wording suggests that sites smaller than 1ha '*will be considered positively where they meet all other development criteria in the plan*' which suggests that such sites do exist however there is no clarity as to the specific circumstances these sites would be supported. For example, where they are outside the built up area boundary?

These smaller sites can clearly make a notable contribution to early delivery in the plan and should be accounted for specifically in the development plan. Particularly as these sites are usually delivered by small and medium enterprises (SME) and housebuilders who experience greater challenges to delivery, particularly in terms of finance and therefore require greater certainty in the planning process in order to succeed. Allocation of smaller sites is therefore crucial to their delivery in the District.



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Q4. Criterion 5 of the Strategic Policy 37: Housing Provision states 1,680 dwellings are anticipated to be delivered over the plan period from windfall sites? What is the compelling evidence this will be a reliable source of supply? Is this windfall allowance realistic and justified?

We would like to understand what evidence has come to light since the Regulation 19/ Submission version of the Plan regarding the council's position on allocating smaller sites of less than a hectare. This is particularly important given MM HM047 which relates to windfall sites, deletes reference to windfall *'including 10% provision on land less than 1 hectare'*, the reason for which is stipulated as being regarding *'evidence'* to support the assertion that such sites cannot be delivered/ allocated.

The inclusion of such wording in the Regulation 19/ Submission plan, demonstrates that the council considered it was possible to meet this 10% requirement through windfall, but that they had simply chosen not to specifically allocate sites.

What new evidence has come to light since this time to justify the need cannot be specifically met by the plan and how/ why has this not affected the proposed windfall allowance given they are now asserting that 10% of this allowance can no longer be met; according to the council's own *'evidence'*?

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?

We contest that the overreliance on larger sites, significantly stymies the council's ability to provide for a five year supply of deliverable sites, given the scale and complexity of delivery of the majority of their supply on larger sites and in the context of prolonged under delivery and their reliance on the Liverpool Method.

The council's decision to rely on the Liverpool Method is as a result of their decision not to allocate smaller sites and is thus a failing of their spatial strategy. The plan fails to allocate sufficient housing for which sites are available and can be delivered in the early part of the plan and therefore lacks sufficient reliance/ a suitable buffer and is considered unsound.