

# Horsham District Council Local Plan 2023-2040 Examination

## Matter 8: Housing

User ID: 1194360

**Address:** Land North and South of West End Lane, Henfield, West Sussex

Prepared as a response to Matters, Issues and Questions (MIQs)

On behalf of: **B Yond Homes Limited:**

**Date:** November 2024

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## Introduction

1. This Hearing Statement is for and on behalf of B.Yond Homes Limited, as prepared by Vail Williams LLP.
2. B.Yond Homes Limited (formerly Rydon Homes Limited) are promoting two sites, both within Henfield. This response to the MIQs is related to the land north and south of West End Lane, Henfield (ID number: 1194360).
3. B.Yond Homes Limited (as Rydon Homes Ltd) have regularly submitted information and representations to Horsham District Council, including the Regulation 19 stage.
4. This Hearing Statement is concerned with **Matter 8 (Housing)** as set out in the Inspector's Matters, Issues and Questions (MIQs) and has been prepared on the basis of the submitted Local Plan and the relevant evidence base.
5. This Statement supports the representations previously submitted by B.Yond Homes Limited under the Regulation 19 stage and only responds to the relevant questions for B.Yond Homes Limited raised within the MIQs.

## Matter 8: Housing

### **Issue 1: Whether the housing requirement is justified, effective, consistent with national policy and positively prepared?**

#### *Q.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?*

*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?*

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

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

It is considered that the proposed housing numbers put forward in the Plan are not justified. The council are failing to meet their identified housing need and this is based upon the impact of water neutrality. The topic paper 1, spatial strategy, produced by Horsham District Council in September 2024 (HDC02) confirms that "Given the impacts of water neutrality, it was concluded that the level of housing growth set out in the 2021 local plan would no longer be deliverable" (paragraph 7.1). Whilst the constraints of water neutrality are acknowledged, it is considered there is sufficient time over the whole Plan period for appropriate mitigation to be identified and put in place to address any harm in relation to the SAC. Once an appropriate mitigation strategy has been implemented, then there would be no additional harm to the

SAC through further development and the benefits of meeting housing needs should be taken into account and the Plan could deliver higher numbers of housing in response to identified needs.

It is noted that the council have previously proposed a significantly higher number of homes per year, as set out in the Regulation 19 representations, and the impact of water neutrality is not considered an absolute constraint over the whole Plan period.

In addition, the government are proposing updates to national policy, along with their overarching commitment to increase house building and the delivery of 1.5 million more homes. Whilst this Plan is significantly progressed under the relevant NPPF, the direction of travel from government and commitment to increasing the housing delivery, combined with the potential solution over the whole Plan period for water neutrality, should be reflected within either the housing targets or, potentially, as a requirement for an early review.

With reference to the stepped annual requirement and the approach to shortfall (Liverpool method), the evidence and the council acknowledge the reduction in housing delivery due to a variety of reasons over recent years (such as COVID and water neutrality). A reduction in housing delivery is likely to have adverse consequences for the local community and economy and, therefore, in this instance it is considered that an increase in housing within the early part of the Plan would help to respond to recent circumstance and provide numerous benefits.

*Q.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, given the recent adoption of the Crawley Local Plan and the close relationship between the Councils for housing and employment. This will confirm the level of unmet need and further illustrate the housing shortfall across the Housing Market Area.

*Q.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?*

Horsham has a history of close working with Crawley to accommodate housing that is unmet in their Borough. This cross boundary working, within the same HMA, is part of the Duty to Cooperate and ensure housing needs are met. Consequently, the District and HMA are failing to plan for adequate housing and meet the identified need.

*Q.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?*

It is considered there is the opportunity to set out a minimum housing requirement for a designated area, in accordance with paragraph 66 of the NPPF to significantly boosting the supply of homes, that could utilise the settlement hierarchy to ensure quantum and delivery are aligned with sustainability.

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

*Q.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?*

As set out in the Regulation 19 representations, it is considered that sites have been unnecessarily discounted where it would be adjacent to a settlement boundary once the policy map is updated to reflect other site allocations. In addition, separation from a settlement boundary by an existing road or other feature is considered to artificially constrain / remove sites that are available and excludes them from a full assessment as part of the SHELAA process.

*Q.2. 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?*

*Q.3. 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?*

In summary, the Council have staggered their housing trajectory and are overly reliant upon strategic sites to deliver the majority of the housing. Figure 6 does not break down the anticipated annual totals to identify the individual allocations or source of housing. In addition, there is no guarantee that neighbourhood plans will (unless already made) be progressed and allocate sufficient further sites. It is considered that there are sufficient sites promoted through the SHELAA to enable further allocations to be incorporated within the Plan, thereby providing sufficient flexibility and a buffer for non-delivery, and to help housing delivery increase towards the identified need (and potentially assist with meeting wider HMA requirements).

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