



## HORSHAM LOCAL PLAN EXAMINATION (OUR PLACE REF 1198209)

### MATTER 3: Homes to meet the needs of all the community

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1.1 This statement has been prepared on behalf of Our Place Sustainable Development Limited ('Our Place'). It follows the Inspector's Notes IDJB02 (Inspector's Guidance Note) and IDJB03 (Inspector's Draft Hearing Agenda/Programme) and considers the proposed approach to meeting housing needs as set out in the Council's Housing Needs Topic Paper (HDCJB07) and Gypsy and Traveller Topic Paper (HDCJB08).

1.2 This Statement comments on the proposed approach and provides recommendations to ensure that the proposals for meeting housing needs in the District is sound.

#### **a. The identified level of affordable housing need**

1.3 Our Place has significant reservations about the soundness of reliance on the Strategic Housing market Assessment ('SHMA') (H01) and the Horsham Social Rented Housing and First Homes Study ('SRFHS') (H10) for calculations of affordable housing need within the District. Those reports were produced in 2019 and 2022 respectively and so do not represent an up to date and justified basis on which to prepare strategic local plan policies (thus failing to meet the requirement in paragraph 31 of the NPPF).

1.4 It is clear that the need for affordable housing is in fact growing year on year. The 2019 SHMA assessed a net need for rented affordable housing of 344 dwellings per annum. The 2022 SRFHS assessed that same need as having grown to 492 dwellings per annum, equating to a 43% increase in just three years. If that same growth in affordable housing need were projected forward to 2026, that would show a need for 793 homes per annum.

1.5 The ability to provide for anything like these scales of affordable housing need is contingent on planning for a sufficient supply across the plan period, as per Our Place's Matter 1 and Matter 2 hearing statements.

#### **b. Whether the proportion of affordable housing sought from each site is appropriate**

1.6 Our Place wishes to reserve its position until the findings of the updated Horsham Viability Study have been made available.

1.7 Our Place recognises that affordable housing is essential. However, defining the appropriate amount and mix needs to be further considered taking into account a robust evidence base for the District as a whole and strategic sites, where delivery challenges differ from e.g. windfalls or smaller allocations.

1.8 The Council's Topic Paper addresses the proposed mix of dwelling sizes but does not deal with the proposed tenure mix of affordable housing. Draft Strategic Policy 39 of the Regulation 19 version of the local plan expects 70% of affordable housing to be provided as social rent or affordable rented homes, and the remaining 30% as low-cost home ownership. Draft Strategic Policy 38 sets out the recommended unit size mix.

1.9 What is appropriate for each site will not necessarily be the same and is right that any strategic policies allow for a flexible approach to be taken and for up to date evidence to be considered.



## Note continued

### **d. The plan's approach towards self-build and custom housing**

- 1.10 The Council's current approach is to not require a specific provision of self-build or custom housing plots from allocated sites, rather for any such provision to be based on up to date evidence of demand. This approach recognises that demand for such sites is relatively low within the District and would be met through the Council's anticipated supply of windfall sites alone.
- 1.11 Our Place therefore support the overall approach.

### **e. The plan's approach towards homes for older people**

- 1.12 Our Place is supportive of the plan's positive framework for meeting the growing need for specialist housing for older people in the District. The Council's Housing Needs Topic Paper refers to the WSCC Extra Care Housing Market Position Statement, which make clear that there is an unmet need for Extra Care Housing, which can include retirement communities or villages, assisted living, or housing with care.

### **f. Accessibility policy**

- 1.13 Our Place is supportive of the plan's overall approach to accessibility requirements.

### **g. Provision for gypsies, travellers and travelling showpeople**

- 1.14 The Council's Gypsies and Travellers Topic Paper makes clear that there is a sufficient existing supply of pitches to meet the needs of those that have been identified as meeting the planning definition.
- 1.15 The Council then propose to require any additional strategic allocations to make a further contribution to pitch provision, aimed at meeting the needs of those whom it was not determined whether they meet the planning definition.
- 1.16 However, the Horsham Gypsy and Traveller Accommodate Assessment Targeted Update (H06) makes clear that it is not a statutory requirement to plan for those that do not meet the planning definition. Therefore the Council's proposed approach regarding requiring strategic allocations to provide additional pitches has not yet been justified. Rather, the Council is risking allocating land for an as-yet unidentified need rather than for Class C3 housing, for which there is a very clear and acute need.