

Examination of the Horsham District Local Plan 2023-2040

Matter 3: Homes to Meet the Needs of All the Community

Bridgewater Farm, Billingshurst

Vistry

Version: 1

Author: Vistry Strategic Land

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Introduction

This Hearing Statement has been prepared on behalf of our client Vistry in response to the examination of the Horsham Local Plan 2023-2040, specifically Matter 3, outlined in the draft agenda as relating to the Council's housing requirement.

Vistry previously made representations at Regulation 18 and 19 stages of the Local Plan process, as well as the original Hearings. Vistry have land interests within the Plan area at a site known as Bridgewater Farm, Billingshurst. This Statement should be read in conjunction with Vistry's representations.

Vistry can confirm that they would like to participate in the week 1 Hearing Sessions proposed.

Vistry Group

Vistry is one of the UK's largest home builders, specialising in mixed-tenure housing and sustainable new communities delivered through a partnerships-led model. The Group has a strong track record of delivery, including a multitude of sites and projects varying in size and scale across the country, supported by new infrastructure, green space, and other facilities.

Early engagement and suitably designed schemes, which are responsive to the local context is at the core of what we do.

Sustainability is central to Vistry's approach, with investment in modern methods of construction, energy-efficient homes and landscape-led design to support long-term environment, social and economic outcomes.

a. The identified level of affordable housing need.

Our Reg 19 representations notes that Paragraph 4.18 of the Plan states that a Strategic Housing Market Assessment (SHMA) has been undertaken to inform the Local Plan. However, this document was published in November 2019 and generally uses data from 2018 and earlier. We therefore consider the SHMA is out-of-date and is not consistent with NPPF Paragraph 31 which requires policies to be underpinned by relevant and up-to-date evidence. The updated information provided by the Council in the Housing Needs Topic Paper published 7th April, highlights that the SHMA information was updated in 2022 with the Horsham Social Rented Housing and First Homes Study (SRFHS); however this data remains somewhat out of date, and up-to-date evidence should be used in accordance with NPPF Paragraph 31.

Notwithstanding the above, Vistry would re-emphasise their previous position that it is regrettable that Paragraph 4.19 does not convey the pressing need for affordable housing within the District, as set out in the SHMA.

The District was assessed as requiring 503 affordable homes per year at that point in time (updated to 554 per annum in the 2022 SRFHS), and whilst some new affordable homes will have been delivered in the years since the evidence documents were drafted, the District's housing completions have declined significantly due to COVID and water neutrality. This is confirmed at Paragraph 19 of the Council's response to Matter 3, which states the number of households on the register as at March 2026 is 755, an increase of c. 155 since the pandemic.

The price of new homes and rental prices have also increased significantly since 2019 and Vistry therefore expect the need for new affordable housing will have strongly increased since the Council's evidence base was prepared.

In line with national policy and in order to be found sound, it is recommended the evidence base be reviewed and updated to support the Plan.

Vistry would recommend further flexibility within policy wording to enable 'additionality' to be brought forward in the appropriate locations. This would enable the delivery of additional affordable homes across the District to ensure an appropriate level is provided for, whilst allowing developers and Registered Providers the ability to implement Grant funding to secure. It is difficult to attach a % requirement to this via policy wording, and Vistry would not advocate for this, but recognition and flexibility for this to be discussed with Housing Officers at the appropriate time should be included.

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

As noted above, given the impact of COVID and water neutrality on delivery, the number of housing completions and affordable housing completions has declined in recent years. The Council submitted a Viability Study to underpin the affordable housing thresholds as part of the original evidence base, and notes that further work is being undertaken to update this; Vistry notes that until this work has been completed the percentage requirements for affordable housing should be set with appropriate flexibility and also with the potential for 'additionality' to be achieved.

It is noted in the Housing Needs Topic Paper published 7th April that reference to First Homes within the proposed tenure split has been removed, and this is welcomed.

It should also be noted that, since the original Viability Study was undertaken, the Council has undertaken a review of its housing need and proposed supply, identifying a shortfall of 2,298 homes. Not only will additional sites be required to address the market demand within this shortfall, but also additional affordable housing will be required. As such it is incumbent on the Council to liaise with developers, promoters and landowners to ensure, not only the most sustainable sites are delivered, but also those who have the ability to deliver policy compliant affordable housing, together with potential for further additionality homes. Vistry would welcome further conversations in this regard, with particular reference to Bridgewater Farm as it has the benefit of being well located from a sustainability perspective, the ability to go some way in mitigating the identified shortfall, providing policy compliant affordable, and the delivery of further additional homes through its partnership model.

c. Whether the mix of homes is appropriate.

It is noted that the evidence for different sizes of dwellings is based on the SHMA (document H01) which uses 2011 Census data. As noted above, Vistry consider this to be out-dated evidence, and to ensure a sound plan, this should be updated to reflect the results of the 2021 Census.

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

Vistry has no comments to make in relation to plan's approach to self-build and custom housing.

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

Vistry has no comments to make in relation to plan's approach to self-build and custom housing.

f. Accessibility policy.

Vistry has no comments to make in relation to plan's approach to self-build and custom housing.