

Hearing statement Matter 5b

Spatial strategy and housing distribution

Southwater Parish Council | Representor ID 1192926

The Parish Council position

1. Southwater Parish Council asks the Inspector to retain the Neighbourhood Plan allocation of 422–450 residential units on land west of Southwater and remove the additional strategic allocation in Policy HA3. This continues the position in our Regulation 19 representation. We recognise the District’s housing needs and the importance of adopting a sound Local Plan.¹
2. Policy SNP2.2 provides for at least 350 C3 dwellings and at least 72 C2 residential units within that total. C3 covers dwellinghouses; C2 covers residential institutions, including care accommodation. These categories should be distinguished when comparing the Neighbourhood Plan allocation with HA3 and calculating housing supply.²
3. The Neighbourhood Plan covers the period to 2031 and requires the site to be planned so that further development in the longer term is not prejudiced. A larger allocation in the Local Plan to 2040 still needs a clear justification. This statement addresses the distribution of development, its effects and the evidence that homes will be delivered. It does not seek to reopen the District’s housing requirement or promote a particular alternative site.³

The scale and location of growth

4. Southwater can accommodate planned growth. HDC’s assessment recognises its services and transport links, but this does not by itself establish that the proposed scale of growth is appropriate. The number of homes should reflect the village’s character and the ability to provide schools, transport, utilities and community facilities when they are needed.⁴
5. Our Regulation 19 representation asked HDC to assess growth at the Neighbourhood Plan scale as an alternative to the larger allocation. The July 2026 Sustainability Appraisal Addendum treats the submitted allocations, as adjusted by the proposed Main Modifications, as fixed across its alternative growth scenarios. It varies additional allocations instead. That comparison does not itself show the effects of a smaller HA3 allocation with the remaining housing provided elsewhere.⁵
6. HDC should identify where this lower-growth option for Southwater has been assessed, or explain why it is not a reasonable alternative. The comparison should consider how the District’s housing needs would still be met, alongside effects on settlement character, transport, infrastructure, the environment and delivery.

¹ Southwater Parish Council, Regulation 19 representation, 29 February 2024, pp. 5–7 and 9–10; Southwater Neighbourhood Plan 2019–2031, Policy SNP2.2.

² Southwater Neighbourhood Plan 2019–2031, Policy SNP2.2, p. 14, and glossary. The plan was made with effect from 24 June 2021: HDC Adoption Statement, para. 3.1.

³ Southwater Neighbourhood Plan 2019–2031, Policy SNP2.2; Inspector’s Guidance Note for the October Hearings (IDJB06, September 2026), paras 20–23; Hearing Agenda (IDJB07), Matter 5b.

⁴ HDC, Site Assessment Report Update, Part B: Strategic Site Assessment (HDCJB14b, June 2026), Southwater assessment, pp. 57–68, particularly the summary on pp. 67–68.

⁵ Southwater Parish Council, Regulation 19 representation, 29 February 2024, pp. 5–7; HDC, Horsham Local Plan Sustainability Appraisal Report: Addendum (HDCJB13, July 2026), para. 2.2.1 and Table 2.1, p. 12.

7. The Sustainability Appraisal also recognises that a spread of smaller sites can support earlier delivery, reduce reliance on individual large developments and provide opportunities for smaller builders. Those advantages should be considered alongside the effects of each possible distribution. They do not make every dispersed development option preferable.⁶

Whether the housing can be delivered

8. The proposed Main Modifications increase HA3's expected contribution by 2039/40 from 735 to 950 homes, within an allocation of 1,000 homes. That increase needs to be supported by a realistic programme.⁷
9. The July 2026 Housing Delivery Study records first completions in the last quarter of 2029. The promoter expects 40 completions in 2029/30, rising to 100 a year from 2032/33. Delivering 950 homes across the eleven financial years from 2029/30 to 2039/40 would average about 86 a year, with only part of the first year available.⁸
10. The same study reports an average of 51 homes a year at Broadacres, excluding the paused year 2024/25. That scheme had one sales outlet. It reports 62 a year at Highwood, rising to 76 during its peak period. HA3's required average is about 69% above the reported Broadacres average. These are useful comparisons, although a different mix of homes and more builders could support faster delivery.⁹
11. We acknowledge that Iceni considers 100 homes a year and 950 completions by 2040 reasonable. Its assessment takes account of the proposed 35% affordable housing and expected involvement of other developers. However, the study describes several delivery options, including Berkeley building the scheme, selling parcels or managing development by other builders. HDC should explain which approach supports the forecast and the evidence that it can be delivered.¹⁰
12. The June 2026 site assessment also needs to be clarified. It says about 950 homes are achievable, but then states that average delivery is unlikely to exceed 70 a year and estimates about 735 homes by 2040. It gives delivery a neutral rating because of concerns about timing and the mix of homes. HDC should explain how the later study resolves these concerns and which assumptions now apply.¹¹

Constraints and infrastructure

13. HDC identifies landscape, ancient woodland, heritage, drainage and infrastructure matters that the development must address. The July study concludes that the scheme is viable and does not identify a major obstacle or an expected significant delay from strategic infrastructure on the evidence available. It nevertheless describes a tight timetable dependent on the section 106 agreement, detailed approvals and pre-commencement conditions. The delivery forecast should explain when essential works will be funded and completed.¹²

⁶ HDCJB13, para. 2.2.10, particularly the discussion of smaller sites on p. 4.

⁷ HDC, Schedule of Proposed Main Modifications (MMJB01, June 2026), MM147, MM202 and MM206.

⁸ Iceni Projects for HDC, Horsham Housing Delivery Study: Update (HDCJB20, July 2026), paras 3.60–3.61 and 3.66–3.68. Calculation: $950 \div 11 = 86.36$ homes per financial year.

⁹ HDCJB20, Table 3.2 and paras 3.63–3.64. Calculation: $((950 \div 11) \div 51 - 1) \times 100 = 69.34\%$.

¹⁰ HDCJB20, paras 3.59 and 3.64–3.68.

¹¹ HDCJB14b, pp. 66–67, Deliverability and Viability; HDCJB20, paras 3.65–3.68.

¹² HDCJB14b, pp. 59–66; HDCJB20, paras 3.54–3.61 and 3.67.

14. The Sustainability Appraisal records permission for 800 homes at Horsham Golf and Fitness Club. HDC should test the likely overlap with HA3 and explain how the local market can support the proposed rates of delivery. The existence of another scheme does not, on its own, prove that HA3 will be delayed.¹³

Consistent figures and clear evidence

15. The policy figures need to be made consistent. MM145 gives a total allocation of 1,044 dwellings in paragraph 10.26, while MM206 gives 1,000 homes, with 950 expected during the plan period. MM206 then describes that delivery as 450 plus 550, which totals 1,000. MM207 refers to both C2 and C3 accommodation. HDC should explain the basis of these figures, distinguish total capacity from completions by 2040, and show how the different accommodation types are counted.¹⁴
16. The August housing supply update provides an indicative District-wide graph and says further detail will follow. Before relying on 950 HA3 completions, HDC should provide a reconciled annual programme showing the builders and sales outlets expected, their start dates, the types and tenures of homes, and the infrastructure needed for each phase. It should test the effect of delays or fewer outlets. Broadacres' annual completions are already in the July study; they should be updated and used in this assessment.¹⁵

Modifications sought

17. The Parish Council's primary request remains the removal of the additional allocation beyond the made Neighbourhood Plan commitment. If HA3 remains, the following minimum changes are required:

Issue	Modification sought
Scale and distribution	Retain the made Neighbourhood Plan scale of up to 450 residential units. If the wider HA3 allocation remains, count a higher plan-period figure only if justified by a reconciled delivery case. Reassess the distribution of any unsupported balance.
Reasonable alternatives	Identify and appraise a lower-HA3 spatial alternative on a like-for-like basis, including its effects on settlement character, transport, infrastructure, environmental constraints and delivery risk.
Delivery evidence	Require a reconciled, independently tested HA3 trajectory covering lead-in, named delivery partners, outlets, product and tenure mix, annual phases, market absorption and infrastructure triggers.
Monitoring and contingency	Monitor HA3 annually against clear milestones and identify contingency supply that does not depend on accelerating this strategic site beyond an evidenced rate.
Consistency	Reconcile the apparent 1,044-home capacity in modified paragraph 10.26 with Policy HA3's 1,000-home allocation and the 950 homes counted by 2039/40.

¹³ HDCJB13, para. 2.2.17, Southwater discussion, p. 7.

¹⁴ MMJB01, MM145, MM147 and MM206–MM207. The discrepancy concerns both the totals and the distinction between the overall allocation and delivery within the plan period.

¹⁵ HDC, Housing Trajectory and Five-Year Housing Land Supply Update (HDCJB22, August 2026), paras 1.1–1.3 and Figure 1; HDCJB20, Table 3.2 and paras 3.65–3.68.

Conclusion

The Parish Council asks the Inspector to retain the made Neighbourhood Plan scale of up to 450 residential units at Southwater. If the wider HA3 allocation is retained, HDC should first reconcile the conflicting delivery assessments and justify any higher plan-period figure through a tested trajectory and clear delivery and infrastructure safeguards. Matter 5b should also address whether a lower-HA3 distribution was fairly assessed against reasonable alternatives.

Artificial intelligence declaration

Artificial intelligence was used to assist with drafting, editing, and structuring this statement, and to help identify and summarise potentially relevant passages within published evidence. All source material, factual statements, calculations, quotations, and references have been checked against the original documents.

The research relied upon, the assessment of the evidence, and the planning arguments and conclusions advanced are those of Southwater Parish Council and its professional advisers. Artificial intelligence was not used to determine the Parish Council's position or substitute professional planning judgement. Southwater Parish Council has reviewed the final statement and accepts responsibility for its accuracy and content.