

Examination of the Horsham District Local Plan 2023-2040

Matter 2: Housing Supply and Headroom

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 2, 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 housing supply trajectory as proposed.

The revised housing trajectory confirms the proposed housing requirement is 17,828 and the current supply provision is 15,430. This leaves a shortfall of 2,398 homes which are yet to be sufficiently addressed through revisions to housing allocations.

Vistry, in line with the Regulation 19 reps submitted, continue to note that a significant proportion of the Council's housing requirement is supported by the delivery of large strategic sites. The reliance on such sites will inevitably result in delays for these to be delivered and contribute to the Council's land supply. This is reflected, to a degree, in the trajectory, however, has resulted in a reduction in delivery in early years of the Plan which could, and should, be supported by the allocation of smaller-medium sized sites, such as the land at Bridgewater Farm (for 200 units).

Vistry's analysis indicates that the revised trajectory provides an additional 391 homes through the intensification of existing allocations (see Table 1, Appendix 1). Furthermore, whilst a number of allocations previously proposed (x7 sites) have been transferred into commitments, they have come forward for a lower quantum than anticipated (see Table 2, Appendix 1). Whilst the difference is minimal, it adds to the remaining shortfall set out above, and as stated, it is not clear how this is to be addressed.

Vistry understood the Council had confirmed through the procedural meeting process it would review previously promoted sites to ensure an appropriate supply position can be accommodated through main modifications. The expectation was, and remains, formerly omitted sites, such as the land at Bridgewater Farm, would be reconsidered and additional sites allocated for delivery. Indeed, with such a substantial shortfall and immediately deliverable and available sites, such as Bridgewater Farm, this should be addressed at the earliest opportunity.

b. The reliability of housing delivery assumptions / allowance for non-delivery.

Vistry has no particular comment to make in relation to the reliability of the assumptions / allowance for non-delivery.

c. The reliability of assumptions about windfalls.

As noted in the Regulation 19 representations submitted by Vistry, no particular comment is made in relation windfall sites. Vistry do, however, note the windfall allowance is used to address the NPPF requirement to provide at least 10% of the housing requirement on sites no larger than 1 hectare. Given the uncertainty regarding windfall delivery, it is not considered appropriate to assume this will be achieved and this should be addressed through modifications to the Plan's current drafting.

d. The robustness of the trajectory.

Vistry has no particular comment to make in relation to the robustness of the trajectory.

e. Maintaining adequate housing land supply including a rolling 5 year supply.

As noted above, Vistry consider the proposed trajectory to be skewed towards a reliance on the delivery of larger, strategic allocations. Whilst a number of sites may already have planning permission (either outline or full), there still remains a significant overall shortfall against the Council's proposed target which should be addressed with smaller sites, such as Bridgewater Farm to ensure an appropriate, well-considered, and diverse trajectory.

Further, whilst it is noted that a number of site allocations have actively engaged with the Council through pre-apps and / or have live application under consideration, this does not guarantee their delivery. Indeed, subject to wider constraints, sites being taken through the pre-application process, could fall away, resulting in an even larger housing shortfall.

Whilst the above risk is difficult to mitigate, in the context of the identified shortfall (2,398 homes), this would suggest more sites need to be considered through this stage of the plan making process so that delivery assumptions and allowance for non-delivery feeding into the land supply calculation can be relied upon.

f. Headroom, resilience and the mitigation of risk.

Vistry note work in relation to the low, medium and high growth scenarios proposed is ongoing and will inform the extent to which a requirement over and above that set out in the Council's response to Matter 1 can be achieved.

Vistry reserve the right to comment on this in more detail as further evidence emerges. However, would note in the context of positive planning, a need to undertake an immediate review by June 2026 which will result in a higher annualised housing requirement of 1,338, a higher growth scenario could be achieved. This is underpinned by the knowledge there are omitted sites, specifically the land at Bridgewater Farm, which could be brought back into the Plan now.

g. Whether the housing requirement should be stepped.

As noted in representations submitted by Vistry to the Regulation 19 Plan, Vistry accept issues relating to water neutrality will result in justification for a stepped trajectory, to some degree, however, the level of stepping proposed has been exacerbated by the Council's own decisions to rely heavily on the delivery of larger strategic sites which will inevitably take a longer period of time to come forward and begin delivery homes which makes a meaningful contribution to delivery.

This strategy is the Council's choice and has been acknowledged in Paragraph 10.27 of the Local Plan and also Paragraph 26 of the Housing Supply and Headroom Topic Paper:

“The stepped trajectory will also reflect the fact that significant proportion of the homes in the submitted plan – and likely many homes of any new allocations – will come from sites that are strategic in scale and will therefore take several years to secure detailed planning permission and begin delivering.”

Supporting smaller sites as set out in H02 (The Housing Delivery Study, 2020) would ensure that 1) the reliance of larger sites is minimised:

“Iceni would recommend that the Council consider whether there are additional deliverable smaller, non-strategic sites in sustainable locations which could be included within the land supply to address this and ensure a sufficient supply-side buffer.”

It is clear from the Local Plan and this latest need and trajectory review that this advice has not been followed.

h. Whether additional housing allocations are required, and if so, of what kind / size / timing.

Vistry agrees with the Council that more sites are required to ensure their need, unmet need, and appropriate headroom. Vistry is supportive of the medium / high growth options to provide a degree of headroom and to ensure a positive approach to planning.

A mix of sites should be provided, however, on the basis it is already recognised there is a reliance on large strategic sites, the focus should be centred and medium sized sites of between 150 – 500 units, including the land at Bridgewater Farm, which has capacity to deliver 200 units.

No further details have been provided as to the Council’s preferred approach and / or list of additional sites to be allocated at this stage. Vistry reserve the right to comment on this in due course.

Appendix 1 – Housing Trajectory Analysis

Table 1 – Review of Proposed Allocations

Site Name	Comment	Submission Plan Capacity	March 2026 Trajectory	Difference
West of Ifield	In plan previously	1,600	1,600	0
West of Southwater	In plan previously	735	950	+215
East of Billingshurst	In plan previously	650	650	0
North of Horsham - Intensification			60	+60
Strategic Site Sub Totals		2,985	3,260	+275
Mousedell Close	In plan previously	75	75	0
Smugglers Lane	In plan previously	50	68	+18
Muntham Drive	In plan previously	25	25	0
Old Schol Site	In plan previously	20	22	+2
Lower Broadbridge Farm	In plan previously	133	133	0
Sandgate Nurseries	In plan previously	55	50	-5
Hornbrook Farm	In plan previously	100	180	+80
Mercer Road	In plan previously	300	304	+4
Trinity Cottage	In plan previously	7	7	0
Cyder Farm	In plan previously	6	6	0
North of Rosary	In plan previously	80	81	+1
North of the Rise	In plan previously	55	55	0
Dunstans Farm	In plan previously	120	120	0
Highfields	In plan previously	25	25	0
Guildford Road	In plan previously	60	90	+30
Former Pig Farm	In plan previously	6	6	0
Rusper Glebe	In plan previously	12	9	-3
East Street	In plan previously	20	18	-2

Shoreham Farm	In plan previously	40	45	+5
Glebe Farm	In plan previously	265	265	0
Northlands Lane	In plan previously	70	56	-14
Rock Road	In plan previously	55	55	0
Bell Road	In plan previously	20	20	0
Hatches Estate	In plan previously	15	15	0
Smaller Allocation Sub Totals		1,614	1,730	+116
Allocation Totals		4,599	4,990	+391

Table 2 – Review of Former Allocations, Now Commitments

Site Name	Comment	Submission Plan Capacity	March 2026 Trajectory	Difference
Field west of Cowfold	Included in commitments	35	40	+5
Field west of Cowfold (South of A272)	Included in commitments	35	35	0
Glayde Farm	Included in commitments	30	30	0
High Bar Lane	Included as commitment	25	25	0
West of Stream House	Included as commitment	40	28	-12
Smock Alley	Included as commitment	15	14	-1
Hatches House	Included as commitment	8	8	0
Newly Committed Sites Totals		188	180	-8