



Hearing Statement

Matter 3: Homes to meet the needs of all the community

Horsham Local Plan - Examination in Public

On behalf of Buchanan Trading Inc (ID 1191108)

1. Introduction

- 1.1 Strutt & Paker are instructed by Buchanan Trading Inc to prepare a hearing statement and participate in Matter 3 (Homes to meet the needs of all the community) at the examination of the Horsham District Council Local Plan. Specifically, we wish to make representations in relation to the Council's approach to custom and self-build (CSB) housing.
- 1.2 Custom and self-build / CSB is a key housing market which helps diversify the housing market and increase consumer choice (Paragraph: 16a Reference ID: 57-016a-2021020). In addition, the Council have a legal duty to provide sufficient planning permissions to meet the demand on their register as set out in section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016).
- 1.3 Buchanan Trading Inc. believe that the Plan as currently drafted is unsound as it does not deliver against the requirements to deliver custom and self-build housing. We believe that Strategic Policy 38 is an ineffective policy mechanism to deliver CSB housing in the district.
- 1.4 We submit that the emerging plan should make sufficient provision to meet CSB housing requirements and one way of doing so would be to make sites specific allocations for CSB plots.
- 1.5 We do not believe that the Local Plan, as currently drafted, will deliver sufficient planning permissions to meet the demand for custom and self-build plots across all base periods. We have recently made submissions to the Council identifying our clients land as having potential for allocation to meet these needs.

2. Delivery of Custom and Self-build housing

- 2.1 The undersupply of plots suitable for the purposes of custom and self-build housing is clearly recognised by the Council in both the Horsham District Council Self and Custom Build Register of Interest Report November 2025 and in relevant appeals decisions and we would submit that the Council's proposed approach will be ineffective in meeting these needs.
- 2.2 The adopted Horsham District Council Planning Framework 2015 seeks to address the need for custom / self-build at Policy SD4 which seeks a mix of dwelling types on allocated strategic development sites. With the exception of the 30 plots granted planning permission in base period 3 (31 October 2017 to 30 October 2018 – see table 1), policy SD4 appears to have had no impact on increasing delivery of CSB plots in Horsham.
- 2.3 The emerging District Plan takes a similar approach at Strategic Policy 38, which states “3. Residential developments will be supported where homes are provided as either self-build or custom-build serviced plots in accordance with the latest demand on the Self and Custom build register. A level of provision that differs from the Council's register may be accepted if supported by robust evidence of local need.”. In addition, emerging Strategic Policy HA1 (Strategic Site Development Principles) states “Strategic Site allocations will be expected to take into consideration the demand for self-build and custom build housing and provide enough serviced plots of land to meet the identified need. Consideration should be given to marketing strategies to ensure local communities have first refusal on new properties reaching the market”.
- 2.4 Strategic policies 38 and HA1 provide no policy mechanism to secure custom and self-build housing and are unlikely, on their own, to have any impact on the latent or future CSB demand in the district. Given that the Council's adopted policy has not had the effect of meeting the needs for custom / self-build housing, we would suggest that the Council's proposed policy will also fail to meet these needs.
- 2.5 Additionally, the Northern West Sussex Strategic Housing Market Assessment (SHMA) completed in 2019 noted the importance of small sites being brought forward to deliver Custom and Self-build housing. Paragraph 12.50-12.51 states:

“An increasing number of local planning authorities have adopted specific self-build and custom build policies to encourage delivery, promote and boost housing supply. These typically require that a minimum proportion of plots within development schemes (often over a certain size) are offered to self-builders or as custom-build plots and/or allocation of

sites solely for the use. However, Icen consider that there is potential for both this – with policy setting out that sites of over a certain size should include a proportion of plots for self/custom-build development; and also potential for individual small sites to come forward to deliver self- and custom-build development whereby an outline application is presented together with a design code, with individual plots then coming forward through reserved matters consents. “

- 2.6 Paragraph 62 of the NPPF Sept 2023 states that, within the context of identifying housing needs, the Council should consider the size, type and tenure of housing needed for different groups, this includes people who wish to commission or build their own home. This requirement is strengthened in latter iterations of the NPPF, including the NPPF 2024 (paragraph 71) which states that “Mixed tenure sites can provide a range of benefits including creating diverse communities and supporting timely build out rates and local planning authorities should support their development through their policies and decisions. Mixed tenure sites can include a mixture of ownership and rental tenures, including rented affordable housing and build to rent, as well as housing designed for specific groups such as older people’s housing and student accommodation, and plots sold for custom or self-build.”
- 2.7 Local authorities have a legal duty to provide sufficient development consents to meet the demand for Self-Build and Custom Housebuilding arising within their administrative area. This should include examining secondary data sources in addition to their Register numbers to obtain a robust assessment of demand to understand and consider future needs for this type of housing.
- 2.8 The significant shortfall is evident in the Council’s reported data as displayed on the Ministry for Housing, Communities and Local Governments Right to Build Register (RtBR) which shows a shortfall in every reporting period to date. The data from the Ministry of House, Communities and Local Government Right to Build register records 2016-2034/24 is shown in the table below.

Base period	Start and finish dates	No. of individuals added to Horsham register per base period	No. of plots granted through suitable PP’s	Shortfall per base period
1	21 March 2016 to 30 October 2016	77	0	-77
2	31 October 2016 to 30 October 2017	125	0	-125
3	31 October 2017 to 30	47	30	-17

	October 2018			
4	31 October 2018 to 30 October 2019	33	0	-33
5	31 October 2019 to 30 October 2020	32	0	-32
6	31 October 2020 to 30 October 2021	49	4	-45
7	31 October 2021 to 30 October 2022	20	0	-20
8	31 October 2022 to 30 October 2023	8	0	-8
9	31 October 2023 to 30 October 2024	9	1	-8
End of records shown on Right to Build Register Monitoring 2016-2024				
10	31 October 2024 to 30 October 2025	6	30	+24
Overall shortfall				-371

Table 1: Right to Build register comparisons of individuals and planning permissions granted.

- 2.9 The evidence on the Right to Build Register demonstrates that there have been 406 registrants entered onto the Council's Self-Build Register to which the statutory duty applies, and only 65 plots have been recorded to address this demand.
- 2.10 The un-met need for CSB plots in Horsham was considered by the Planning Inspector in the allowed appeal (APP/Z3825/W/21/3283823) on the Land at Duckmoor, East of Billingshurst, Billingshurst RH14 9DZ. The inspector both recognised the significant under supply of CSB plots in Horsham and afforded the CSB element of the development significant weight in the planning balance:
- 58. Additionally, four units of residential accommodation would be provided as custom/self build plots. The Council recognise that there is a significant shortfall of such plots/permissions to meet the identified need. These units would contribute to meeting part of a different housing need in the area and should also be attributed substantial weight.*
- 2.11 There is a clear latent unmet demand for self-build and custom housebuilding in Horsham and unquantified, yet the Local Plan does not adequately make provision to meet this

need. We submit that small sites could be allocated to meet such needs. Buchanan Trading have made submissions directly to Horsham District Council identifying land which could be allocated for self-build or custom build housing, as such, there are sites available for allocation, to meet this need. The Council, through main modifications to the plan, should seek to allocate self-build / custom build sites.

2.12 **Annex 1** of this letter includes best practice examples of other emerging Local Plan policies which allocate specific sites for Custom and Self-build housing. These examples include the emerging Bristol Local Plan which allocated 60 CSB units over 3 separate sites, and the Stratford-upon-Avon Local Plan which allocates 142 units over 12 separate sites.

3. Summary

- 3.1 Buchanan Trading Inc. do not believe that the Local Plan, as submitted, will be effective in meet the demand and need for CSB housing in the District.
- 3.2 The September 2023 version of the NPPF highlights to importance of small and medium sized sites (paragraph 69) and the need to deliver against a range of housing needs, including those wishing to commission or build their own home (paragraph 62) Council's should seek opportunities to promote delivery.
- 3.3 The inclusion of site specific CSB allocations would make a small but valuable contribution towards meeting the significant unmet and future demand for custom and self-build sites in the district of Horsham. This would also promote variety in housing styles and overall consumer choice which would raise the overall standard of design in Horsham and provide overall economic benefits.

Annex 1 – Example site specific policies supporting Custom and Self-build

Stratford Upon Avon Local Plan – Site Allocations Plan (Regulation 18 – June 2022)

Policy SAP.6 Providing for Self-Build and Custom Housebuilding

The provision of self-build and custom-build dwellings is supported in principle. The scale of such provision will be dependent on robust evidence regarding the demand for and supply of plots for this specific purpose. To be acceptable, the initial owner of each plot will be required to have a primary input into the final design and layout of the dwelling.

1. Overall principles

The provision of self-build and custom-build homes will be facilitated in the following ways:

1. As an integral part of the housing mix in the new settlements at Gaydon/Lighthorne Heath and Long Marston Airfield.
2. On sites allocated for this specific purpose in accordance with Site Specific Proposals SCB.1 to SCB.12.
3. On unallocated sites in accordance with Part 2 of this Policy.
4. On single plots and small groups of plots within and adjacent to settlements to meet a local need, including replacement dwellings.

With respect to all schemes promoted under 2 and 3 above, planning applications will be required to include evidence regarding the demand for and supply of self-build and custom build dwellings. The Council will only grant permission if there is a proven need for further plots to be provided. All schemes promoted under 3 above should be small-scale and appropriate to the size and character of the settlement where the site is located.

All schemes comprising multiple plots will be subject to a legal agreement requiring:

- (i) All plots to be offered in the first instance to individuals or households that have a local connection through living and/or working in Stratford-on-Avon District or by having close family living in the District.
- (ii) A marketing strategy which specifies the minimum length of time for advertising plots and the appropriate means of doing so, ~~and based on an independent valuation.~~

Bristol Local Plan Policy (Submission version – November 2023)

H5: Self-build and community-led housing

The provision of new homes through self-build, custom housebuilding and other community-led approaches will be encouraged.

Site allocations for self-build, custom housebuilding and community-led housing

The following sites are allocated specifically for self-build and custom housebuilding and/or community-led housebuilding:

- Bridge Farm, Glenfrome Road, Eastville;
- Land at College Road, Fishponds;
- Stapleton Cricket Club, Park Road, Stapleton.

Provision for self-build, custom housebuilding and community-led housing as part of new development. At least 5% of homes will be in the form of self-build/custom-build housing and/or community-led housing on the following sites allocated for new homes:

- Land at Bath Road, Brislington;
- Land to west of Elsbert Drive, Highridge. Growth and regeneration areas A proportion of self-build/custom-build housing and/or community-led housing will be sought as part of the overall development of identified growth and regeneration areas. Community-led housing exception sites Proposals for community-led housing of a scale and mix appropriate to the location and to the level and type of local need identified will be permitted on sites meeting the following descriptions:
 - Redundant community facilities land or buildings;
 - Underused land or sites within Industry and Distribution Areas (Policy E5 'Industry and Distribution Areas') provided the proposal is compatible with the industrial character of the area and would not adversely impact on the viability and continued operation of existing industrial uses;
 - Sites subject to Policy E6A 'New workspace within mixed-use development';
 - Reserved Open Space (Policy GI2 'Reserved Open Green Space'), provided the proposal is demonstrably supported by the local community and no deficiency of open space will result. Affordable housing Proposals for community-led housing on

sites allocated specifically for self-build, custom housebuilding and community-led housing and on community-led housing exception sites should, where viable, be delivered primarily as affordable housing. On all other sites proposals that include community-led housing should contribute towards the provision of affordable housing in accordance with policy AH1 'Affordable housing provision'. Policy AH1 will not apply to homes developed for self-build and or custom housebuilding except on sites that are allocated as listed above.