

Hearing statement Matter 6b

Policy HA3 Land North West of Southwater

Southwater Parish Council | Representor ID 1192926

Southwater Parish Council's overarching 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 our Regulation 19 position. We recognise the District's housing needs and the importance of an adopted Local Plan.¹
2. The Neighbourhood Plan allocation includes at least 350 C3 dwellings and at least 72 C2 residential units. C3 covers dwellinghouses; C2 covers residential institutions, including care accommodation. HA3's proposed policy wording also refers to both C2 and C3 accommodation. The different categories and their contribution to housing supply must be stated consistently.²
3. The Neighbourhood Plan runs to 2031 and allows for the possibility of further development in the longer term. Our objection is that the larger allocation and the homes counted towards the Local Plan to 2040 need a clear, evidenced justification. If HA3 remains, the Inspector should test whether 950 homes can be completed by 2040 and whether the policy secures the infrastructure and coordinated development needed to support them.³

The delivery timetable

4. The proposed Main Modifications increase the homes expected by 2039/40 from 735 to 950. The July 2026 Housing Delivery Study records a proposed start on site in the second quarter of 2028 and first completions in the last quarter of 2029. Construction and the first completed homes are therefore separate milestones.⁴
5. The June site assessment records a promoter estimate of about 83 homes a year, based on 1,000 homes from 2029/30 to 2040/41. The plan-period target is different: 950 homes across the eleven financial years from 2029/30 to 2039/40 averages about 86 a year. The first of those years would contain only a few months after first completions.⁵
6. The June assessment contains conflicting conclusions. It describes about 950 homes as achievable, but also says average delivery is unlikely to exceed 70 a year, estimates about 735 completions by 2040 and gives delivery a neutral rating. The later July study supports 950, with an expected rate of 100 a year once delivery has built up. HDC should explain which assumptions have changed and how the earlier concerns have been resolved.⁶

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; HDC, Schedule of Proposed Main Modifications (MMJB01, June 2026), MM206–MM207. HDC's Adoption Statement, para. 3.1, confirms the Neighbourhood Plan was made with effect from 24 June 2021.

³ Southwater Neighbourhood Plan 2019–2031, Policy SNP2.2; Inspector's Hearing Agenda (IDJB07, September 2026), Matter 6b.

⁴ MMJB01, MM147, MM202 and MM206; Icen Projects for HDC, Horsham Housing Delivery Study: Update (HDCJB20, July 2026), paras 3.60–3.61 and 3.68.

⁵ HDC, Site Assessment Report Update, Part B: Strategic Site Assessment (HDCJB14b, June 2026), p. 66; HDCJB20, paras 3.60 and 3.66–3.68. Calculations: $1,000 \div 12 = 83.33$; $950 \div 11 = 86.36$. The first calculation includes 2040/41, beyond the plan period.

⁶ HDCJB14b, pp. 66–67, Deliverability and Viability; HDCJB20, paras 3.65–3.68.

What the local evidence shows

7. The July study reports an average of 51 homes a year at Broadacres, excluding 2024/25 when delivery paused. This was a scheme with one sales outlet. It also reports an average of 62 homes a year at Highwood, rising to 76 during its peak period. Broadacres is a useful local comparison, but it does not establish the maximum that a different scheme could deliver.⁷
8. The required HA3 average of about 86 homes a year is roughly 69% above the reported Broadacres average. Icenii nevertheless considers 100 a year reasonable, taking account of the proposed 35% affordable housing and expected involvement of other developers. Its report discusses several delivery models and the possible division of the residential land into three parcels. HDC should provide the evidence behind the chosen approach and the expected timing of each builder's involvement.⁸
9. The Sustainability Appraisal records an 800-home permission at Horsham Golf and Fitness Club. HDC should assess the likely overlap with HA3 and whether the proposed mix of homes and sales outlets can sustain the forecast delivery rate. The effect of competing supply needs to be tested rather than assumed.⁹
10. Our preferred scale remains the Neighbourhood Plan allocation. If the wider HA3 site is retained, our fallback request is to count no more than 450 residential units within the plan period unless a higher figure is supported by a reconciled and independently tested delivery programme. This is the Parish Council's planning judgement; it is not a numerical limit proved by Broadacres. Any housing supply allowance must also explain how C2 accommodation is treated.¹⁰

Evidence and control of the whole site

11. HDC and the promoter should provide an annual HA3 programme covering the time needed for approvals and site preparation, the release of each phase, builders and sales outlets, housing types and tenures, and infrastructure dependencies. It should test delays, fewer outlets and overlapping local supply. The published Broadacres completion figures should be updated and used to explain the comparison. The August supply update is a high-level District-wide assessment and says further detail will follow.¹¹
12. The July study reports that a masterplan and phasing strategy have been prepared. MM205 also requires a comprehensive masterplan to be agreed at the planning application stage. We ask for clear policy wording that secures an agreed masterplan, design code and infrastructure programme for the whole allocation before individual development parcels are approved. Later applications should follow that framework, including where land is sold or different builders become involved.¹²

⁷ HDCJB20, Table 3.2 and paras 3.63–3.64. The published annual completion figures are a better benchmark than estimating delivery from the time elapsed since permission.

⁸ HDCJB20, paras 3.59 and 3.64–3.68. Calculation: $((950 \div 11) \div 51 - 1) \times 100 = 69.34\%$.

⁹ HDC, Horsham Local Plan Sustainability Appraisal Report: Addendum (HDCJB13, July 2026), para. 2.2.17, Southwater discussion, p. 7.

¹⁰ Southwater Parish Council, Regulation 19 representation, 29 February 2024, pp. 9–10; Southwater Neighbourhood Plan 2019–2031, Policy SNP2.2. HDCJB20, paras 3.65–3.68, supports a higher figure and does not recommend a 450-unit limit.

¹¹ HDCJB20, Table 3.2 and paras 3.60–3.68; HDC, Housing Trajectory and Five-Year Housing Land Supply Update (HDCJB22, August 2026), paras 1.1–1.3 and Figure 1.

¹² HDCJB20, paras 3.60 and 3.65; MMJB01, MM205. The design code and explicit cross-parcel sequencing are changes requested by the Parish Council.

Transport and education

- 13.** The policy should link occupation of homes to funded delivery of the necessary transport works. These include the link road to Worthing Road, access arrangements, traffic signals at Hop Oast, bus services and walking and cycling routes, including connections to the Downs Link and railway stations. MM215 changes the link-road destination to Worthing Road; it does not require a direct road connection to Hop Oast roundabout. The programme should identify what must be completed before each housing phase is occupied.¹³
- 14.** MM204 retains the expectation that the school will be provided at the location identified in the Neighbourhood Plan. That safeguarded land is south of New Road. An education delivery strategy agreed with West Sussex County Council should specify the land to be transferred, funding responsibilities, the sequence of provision and opening dates. Safeguarding land and referring to early delivery do not, by themselves, establish when school places will be available.¹⁴

Local facilities and environmental safeguards

- 15.** The neighbourhood centre should meet the development's needs while retaining Lintot Square as Southwater's main centre. HDC's site assessment records that a retail impact assessment has already been submitted. The policy and masterplan should secure an appropriate scale, mix of uses and delivery timetable in light of that assessment.¹⁵
- 16.** The framework for the whole site should also secure landscape and heritage protection, ancient woodland buffers, biodiversity measures, drainage and utilities before individual parcels are approved. The July study finds the scheme viable and identifies no major obstacle on the evidence available. It also recognises a tight approvals timetable. Clear funding and occupation milestones are needed to turn these assumptions into a deliverable programme.¹⁶

Consistent housing totals

- 17.** MM145 gives 1,044 dwellings in paragraph 10.26, while MM206 identifies 1,000 homes in HA3 and 950 completions within the plan period. MM206 then describes that delivery as 450 plus 550, which adds up to 1,000. HDC should reconcile these figures, explain how C2 and C3 accommodation is counted, and distinguish the overall allocation from the homes expected by 2039/40 and any later balance.¹⁷

¹³ MMJB01, MM213–MM219, particularly MM215–MM216; IDJB07, Matter 6b(i); HDCJB20, paras 3.54–3.55.

¹⁴ MMJB01, MM204 and MM209; HDCJB14b, pp. 57 and 67–68. The detailed delivery strategy and milestones are changes requested by the Parish Council.

¹⁵ MMJB01, MM208; HDCJB14b, p. 66, Retail.

¹⁶ HDCJB14b, pp. 59–65; MMJB01, MM205 and MM211–MM212; HDCJB20, paras 3.57–3.61 and 3.67.

¹⁷ MMJB01, MM145, MM147 and MM206–MM207.

Modifications sought

18. If HA3 remains, the Parish Council asks for the following modifications::

Issue	Modification sought
Housing trajectory	Primary position: retain the made Neighbourhood Plan allocation of 422–450 residential units and remove the additional HA3 land. If wider land remains allocated, include no more than 450 units within the period to 2039/40 unless a tested trajectory justifies more.
Delivery evidence	Require annual Broadacres completion data and a year-by-year HA3 programme covering lead-in, phase releases, the number and timing of outlets, housing type and tenure mix, market absorption, and infrastructure dependencies.
Site-wide control	Require one comprehensive masterplan, design code and infrastructure phasing plan before individual parcels are determined. Later applications must accord with it.
Infrastructure	Set funded and phased occupation triggers for access and the Worthing Road link, Hop Oast signalisation, transport, schools, drainage, utilities and community facilities, with monitoring and remedial action.
Local centre	Keep the neighbourhood centre proportionate and complementary to Lintot Square; make its scale and phasing responsive to the submitted retail impact assessment.
Plan consistency	Without prejudice to the Parish Council’s principal position, reconcile the 1,044-home figure in modified paragraph 10.26 with the 1,000-home allocation in Policy HA3, and make all references to the allocation and its plan-period contribution consistent.

Use of artificial intelligence

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.