

# Horsham District Local Plan (2023-2040)

Hearing Statement Relating to Matter 8  
On Behalf of Vistry Group PLC  
Relating to Bridgewater Farm, Billingshurst

November 2024

**Vistry Group**

**Gillings**  
Planning

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### Client

Vistry Group PLC

### Date of Issue

22<sup>nd</sup> November 2024

## 1.0 Introduction

- 1.1 This Hearing Statement has been prepared on behalf of our client Vistry Group PLC ('Vistry') in response to the publication of the Horsham District Local Plan 2023-2040 (the 'Plan').
- 1.2 Our client previously made representations at Regulation 18 and Regulation 19 stages of the Local Plan preparation.
- 1.3 Vistry have land interests within the Plan area at a site known as Bridgewater Farm, Billingshurst.

### Billingshurst

- 1.4 The Billingshurst site is identified in the image below, located to the south of Newbridge Road. The site measures approximately 10.44ha and is currently pastoral fields that adjoin the settlement boundary of Billingshurst to the east. The site forms a logical and sustainable extension to the village and could provide approximately 200 dwellings, including much needed affordable housing.



Aerial photograph showing the Billingshurst site outlined in red (by courtesy of Google ©)

- 1.5 The site was submitted as part of the call for sites in 2018 as part of a Broad Location within the Northern West Sussex Housing Market area (SHLAA reference SA642)

**This Statement**

- 1.6 This brief Hearing Statement has been prepared in accordance with the prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF), September 2023 and the Planning Practice Guidance (PPG).
- 1.7 We do not seek to unnecessarily repeat points raised in our comprehensive representations, but we have answered the questions posed by the Planning Inspector in the Matters, Issues and Questions (14<sup>th</sup> October 2024) where we feel it would be helpful to do so.
- 1.8 Gillings Planning, on behalf of the Vistry Group PLC wish to take a full and active part in the relevant Hearing sessions relating to their interests in the site.

## 2.0 Our Responses to the Matters, Issues and Questions

### Matter 8 – Housing

**Matter 8, Issue 1 – Whether the housing requirement is justified, effective, consistent with national policy and positively prepared?**

**Q1.** *Is Strategic Policy 37: Housing Provision sound?*

*a) Is the requirement for 13,212 homes between 2023 and 2040, below the local housing need for the area as determined by the standard method justified? Is it clear how the figure has been calculated and should this be explained more clearly in the justification text?*

- 2.1 No, in our opinion SP37 is neither sound or justified. As set out in our representations, and not repeated here, we consider that the Plan could accommodate more housing growth to meet its own needs and to help meet, at least a small portion, of the needs of neighbouring LPAs.

**Matter 8, Issue 2 – Whether the overall housing land supply and site selection process is justified, effective, consistent with national policy and positively prepared?**

**Q2.** *The NPPF at paragraph 74 states strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period? Is this achieved by Figure 6 of the Plan?*

- 2.2 Whilst the diagram provided as Figure 6 is somewhat helpful and shows a pattern of expected housing delivery; it is not as accurate as a table containing data; as such it cannot be scrutinised and monitored effectively by officers and indeed by the development industry. A tabularised trajectory would assist.

**Q4.** *Criterion 5 of the Strategic Policy 37: Housing Provision states 1,680 dwellings are anticipated to be delivered over the plan period from windfall sites? What is the compelling evidence this will be a reliable source of supply? Is this windfall allowance realistic and justified?*

- 2.3 As set out in our representations, and not repeated here, we do not have any particular comments on the level of the windfall site allowance, but we are concerned that the Plan relies on the windfall allowance to provide for the NPPF paragraph 69 a) requirement that 10% of the overall housing provision should be on sites no larger than one hectare.

- 2.4 We have been monitoring the examination of the Chichester Local Plan, and we are concerned that water neutrality will impact upon windfall sites.
- 2.5 The examination heard that there is a real lack of clarity surrounding the SNOWS offsetting mitigation and there is an intention to limit the sale of SNOWS credits only to developments which are included in the Local Plan.
- 2.6 This would force all speculative and unexpected windfall developments to find their own mitigation. We are concerned that allocated sites may receive a ‘first preference’ and all windfall sites may struggle to secure credits. If allocated development sites do not come forward, would those credits be held up and not put to good use?
- 2.7 We remain concerned that the windfall allowance cannot be relied upon.

**Matter 8, Issue 3 – Whether the other housing policies are justified, effective, consistent with national policy and positively prepared?**

**Q1.** *Is Strategic Policy 38: Meeting Local Housing Needs sound? Is it consistent with the relevant evidence, particularly the Strategic Housing Market Assessment?*

- 2.8 As set out in our representations, and not repeated here, we consider that the SHMA (November 2019) which is generally based on data from 2018 and earlier, a time period that is ‘pre-Covid’ is not up-to-date and does not reflect the true need that exists today in our post-Covid world.