

### 3. Horsham District Local Plan 2023 – 2040 Examination

Date: 10 April 2026  
From: Nexus Planning obo Berkeley Strategic Land Ltd  
Representor ID: 1198968

#### Matter 3 – the Housing Requirement

3.1 This Hearing Statement has been submitted by Berkeley Strategic Land Limited ('Berkeley'), in respect of the 'Land North West of Southwater' (HA3) 'Strategic Site' for around 1,000 homes.

3.2 Berkeley is generally supportive of the emerging Local Plan and wishes to see it adopted, subject to modifications as appropriate. The adoption of a Local Plan is imperative as part of a plan-led approach, which comprises a cornerstone of the planning system and remains a key priority for the Government.

3.3 Where relevant, this Hearing Statement presents an update to Berkeley's previous submissions. However, the previous submissions remain extant where not updated in this Hearing Statement.

#### (a) The identified level of affordable housing need

3.4 No comment. Refer to previous Hearing Statements on the matter.

#### (b) Whether the proportion of affordable housing sought from each site is appropriate

3.5 Yes. The policy is consistent with the SHMA (H01) which identifies a need for 503 affordable homes per year in Horsham which is '*...significant and justifies planning policies seeking to maximise affordable housing... subject to viability*' (H01 p.90).

3.6 Berkeley **supports** the principle of seeking to maximise affordable housing delivery in balance with viability considerations. Strategic-scale sites are associated with significant infrastructure requirements which result in site-specific costs; it is right that these additional infrastructure requirements are taken into account to provide a bespoke affordable housing requirement for strategic site allocations.

3.7 Berkeley **supports** the identification of a bespoke affordable housing requirement associated with emerging Policy HA3. The approach is consistent with the Plan's viability assessment (**H12**) (albeit this is now dated), which assesses affordable housing requirements and strategic sites specifically.

- 3.8 However, it must be noted that the requirement for 35% affordable housing can only reasonably be delivered subject to viability. In line with the recommendations in the Council's viability evidence, it is imperative that the Council does not seek to 'double-dip' infrastructure requirements alongside Community Infrastructure Levy ('CIL') payments, and site-specific financial obligations.
- 3.9 If the Council does seek significant additional obligations as part of the planning application process (including those which would be tantamount to double-counting), it risks tipping otherwise viable development proposals into the realms of viability concerns, potentially jeopardising affordable housing delivery.

### **(c) Whether the mix of homes is appropriate**

- 3.10 Yes. The mix of homes sought is sound. It is consistent with the Council's housing needs evidence, as set out within the Strategic Housing Market Assessment ('SHMA') (2019). Berkeley therefore **supports** the proposed housing mix requirements set out in the emerging Local Plan.
- 3.11 However, our experience 'on the ground' in relation to the submitted planning application for the land North West Southwater is that the Council's officers are seeking to deviate from the SHMA housing mix, seeking to defer to the Housing Register in relation to affordable housing provision. The view of officers appears to be that the SHMA is now dated.
- 3.12 Berkeley considers that the SHMA-based mix of homes should be relied upon to inform the housing mix requirements throughout the Plan period, being an evidence-based assessment of long-term housing needs.
- 3.13 Whilst the Housing Register might be a material consideration that may indicate departure from the SHMA mix, it is a shorter-term position that is not necessarily appropriate to apply to long term strategic sites.
- 3.14 Clarification should be sought from the Council that the SHMA-based will comprise the baseline starting point for development proposals throughout the Plan period. Otherwise, it calls into question the validity of the Local Plan evidence and becomes challenging for developers to know where to start with a proposed housing mix.

### **(d) The plan's approach towards self-build and custom housing**

- 3.15 No comment.

**(e) The plan's approach towards homes for older people**

3.16 Berkeley provides no comment on the Plan's wider approach towards the provision of homes for older people.

3.17 However, it is pertinent to note that the submitted Outline Planning Application ('OPA') (HDC reference: DC/26/0366) for the development of the Land Northwest of Southwater (emerging Policy HA3) includes for up to 80 specialist accommodation units (Use Class C2), reflecting the policy requirements.

**(f) Accessibility policy**

3.18 Yes, this policy is sound. Berkeley **supports** the requirement for all housing to meet M4(2) standards will ensure market homes can be adapted by users if needed, and contribute to meeting the broader needs of the ageing and disabled population.

**(g) Provision for gypsies, travellers and travelling showpeople**

3.19 Berkeley provides no comment on the Plan's wider approach towards the provision of pitches and plots for gypsies, travellers and travelling showpeople.

3.20 However, it is pertinent to note that the submitted OPA (HDC reference: DC/26/0366) for the development of the Land Northwest of Southwater (emerging Policy HA3) includes for up to 5 gypsy and traveller, pitches reflecting the policy requirements.

Word count: 832.