



Strategic Policy HA10, Site HOR1  
Land at Hornbrook Farm, Brighton Road Horsham, RH13 6QA

## **HEARING STATEMENT**

Matter 9, Issue 2, Question 6

November 2024

**Strategic Policy HA10, Site HOR1 Land at Hornbrook Farm, Brighton Road, Horsham**

**Hearing Statement in Support of a Residential Allocation in the Horsham Local Plan**

**Matter 9, Issue 2 - Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?**

**Q6. Is Strategic Policy HA10: Horsham Housing Allocations sound?**

**b) HOR1?**

**Background**

1. This Hearing Statement is prepared on behalf of Jonathan Marshall, representing the Marshall family and Hornbrook Developments LLP (landowners) and Jaynic Properties Limited (land promotor) and follows earlier representations made to the emerging Regulation 18 and Regulation 19 consultations of the Horsham District Local Plan (HDLP). The site is proposed as a housing allocation under Policy HA10 and identified as housing site HOR1 – Land at Hornbrook Farm.
2. The Marshall family and Hornbrook Developments LLP wholly own the site with no legal or land title impediment to prevent site development, and have confirmed the deliverability for housing within the Plan period, having already submitted pre-application proposals to the Council for over 100 new homes.
3. Jaynic Properties Limited are an experienced residential land promoter and have been appointed by the landowner to bring forward an outline planning application for the site. Having now appointed a full consultant team, we anticipate submitting an outline planning application in Summer 2025.

**Examination in Public**

4. Our intention is to secure planning permission and coordinate delivery of the land for housing in accordance with allocation HOR1 of Policy HA10. We

therefore confirm that we fully support the allocation of the site for housing, as proposed under Policy HA10.

5. Our representations on this site, supported by the Council, confirm that the site is suitable, available and achievable for residential development and deliverable early in the Plan period.
6. We consider that Policy HA10 has been positively prepared and is justified, effective and consistent with national planning policy.
7. However, as set out in our representations under the Regulation 19 consultation we consider that an amendment to the drafted policy wording should be made, and note that no modifications have been put forward to Policy HA10 in the Council's Supporting Document SD14 - Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan.

**Proposed Housing Allocation of Land at Hornbrook Farm**

8. There is strong support for residential allocations and additional growth for Horsham. Horsham is the top tier settlement in the District and therefore development should be directed here to maintain a thriving town, and ensure that it remains a highly sustainable settlement. In strategic terms, direction of this scale of growth to this location is entirely justified and consistent with achieving sustainable development. It will form a logical extension to the largest and evidently most sustainable settlement in the District to accommodate growth.
9. The HOR1 site is already advancing through the planning process, which has included two positive pre-application meetings with the Council for residential developments in excess of 100 dwellings. The most recent response from the Council in February 2024 was amenable to an early submission for outline planning permission. Detailed site assessments, surveys and studies are now

underway and will comprise all those required to support an outline planning application.

10. The allocation of the site for at least 100 homes will ensure that the development that comes forward makes the most efficient use of the site, while still being in accordance with the relevant policies of the Local Plan. The site is self-contained and in a sustainable location near to Horsham town centre with connections to public transport, local schools and other amenities.
11. The work undertaken to date demonstrates the intent to bring the site forward for development early in the Plan period, and working jointly with their residential land promotion partner, the landowner is actively preparing to secure planning permission and coordinate delivery of the housing allocation, working in cooperation with local stakeholders and the Council.

**Proposed Changes to Policy HA10**

12. Policy HA10 proposes to allocate two sites “for the provision of at least 400 homes”. The policy sets a minimum level of housing delivery from the combined output of the two sites, but in terms of the output from the two sites individually, the policy specifies:
  - *HOR1: Land at Hornbrook Farm, 10.45 hectares (100 homes)*
  - *HOR2: Land at Mercer Road, 14.3 hectares (300 homes)*
13. As currently drafted, the development of both sites in accordance with the two specified site allocations would deliver exactly 400 homes, whilst the expectation of the policy is that a minimum of 400 homes are delivered from the development of both sites.
14. The Council’s intention may be that the sites will deliver more than 400 units within Horsham. However, it is not beneficial for the wording of the housing allocation policy to be so vague; and rather for consistency it should explicitly

state that the capacity shown is the minimum number of homes required on each site in order to meet the proposed housing allocation.

15. The Plan is not seeking to meet all of the identified housing need for the district and intends to provide for its shortfall through working with neighbouring authorities to identify sustainable locations outside of the borough. In order to maximise the level of provision within the district the Council should ensure that the proposed housing allocations make the most efficient use of the available land, in line with the requirements set out in the NPPF. Delivery of more housing on the smaller allocated sites within the Plan, such as HOR1, will also assist in the earlier delivery of housing, rather than the slower delivery rates of the larger strategic sites.
16. Therefore, the inclusion of “at least” before the proposed number of homes for each housing allocation provides flexibility and is considered to be justified and effective, as well as being consistent with the aim of the policy. This amendment would be sufficient to provide the appropriate degree of clarity, particularly as our early site assessment work demonstrates that this 10ha site can accommodate well in excess of 100 units at a comparatively low density.
17. Paragraph 11a) of the NPPF (supported by footnote 27) requires Development Plan policies to promote an effective use of land and to optimise site densities, while Chapter 11 specifically sets out the need for planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses. The proposed amendment to the wording Policy HA10 would ensure that it meets this requirement.
18. For the avoidance of doubt, whilst we consider modifications to the plan regarding the wording of the policy around the number of dwellings deliverable the above to ensure the policy is sound, the Site is deliverable even if the requested modifications were not agreed.

19. The following change to HDLP Policy HA10 is therefore proposed: There are no words proposed to be omitted. Additions are shown in **bold**.

*“1. The following sites are allocated, as shown on the Policies Map, for the provision of at least 400 homes:*

- *HOR1: Land at Hornbrook Farm, 10.45 hectares (**at least 100 homes**)”*

20. We have not made representations specifically in respect of HOR2, but for consistency we would suggest that this inclusion of the phrase “at least” is also added for that allocation. This is to clarify that each HA10 site is providing a minimum number of homes, and is able to provide a cumulative minimum of at least 400 homes (at least 100 units and at least 300 units), in line with the Policy aim stated at HA10(1).

### **Conclusions**

21. We support the housing allocation for the site and agree it is suitable for more than 100 new homes. Horsham being the main town in the district can support and maintain growth throughout the plan period and additional residential development should be focused in this area.
22. The site is on the edge of the town with good connections and through pre-application discussions to date those linkages can be improved to support this sustainable housing development site.
23. In parallel to submitting representations to the draft HDC Local Plan consultations, positive pre-application discussions have taken place with the Council. It is anticipated these will continue; bolstered by the appointment of an experienced residential land promotion partner, with a view to submitting an outline planning application in 2025 for at least 100 homes.
24. We confirm that the site is suitable, available and achievable for residential development and deliverable early in the Plan period.

25. Whilst supporting the housing allocation, we are of the opinion that additional wording should be included for consistency and to clarify the policy intention, to ensure that at least 100 homes are built on the site, which will in turn ensure the most effective use of the land and remain in accordance with the other policies in the Plan and wider National Policy. On the basis of the proposed amendments we consider Policy HA10, and specifically HOR1, to be fundamentally sound; i.e. positively prepared, justified, effective and consistent with national planning policy.