

2. Horsham District Local Plan 2023 – 2040 Examination

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

Matter 2 – Housing Supply and Headroom

2.1 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.

2.2 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.

2.3 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 housing supply trajectory as proposed

2.4 The anticipated housing supply has been updated by the Council within **HDCJB05a**, reflecting the passage of time since the submission of the Plan. The March 2026 position sets out a supply of 15,430 homes over the Plan period to 2039/40, reflecting a shortfall of -2,398 against the proposed housing requirement.

2.5 Our response to Matter 1 indicates that at least two additional years should be added to the Plan period to ensure consistency with national planning policy. Two additional years' worth of supply should also therefore be identified for as a consequence.

2.6 Berkeley considers that the Council should seek to meet its local housing needs as a minimum, plus any provision for a buffer to ensure resilience in the supply. Any provision being made for the unmet needs of neighbouring authorities should be met in addition to the above.

(b) The reliability of housing delivery assumptions / allowance for non-delivery

2.7 Berkeley **supports** the housing delivery assumptions in respect of the Land Northwest of Southwater (Policy HA3) specifically.

- 2.8 The Council's updated Housing Trajectory at **HDCJB05a** reflects information provided by Berkeley in January 2026 to inform the renewed Local Plan examination, in respect of the site's delivery.
- 2.9 Berkeley submitted an Outline Planning Application ('OPA') (reference DC/26/0366) for the development of the site in February 2026. The submitted planning application reflects the allocation set out under emerging Policy HA3, including for up to 1,000 homes (Use Class C3), and is presently awaiting determination.
- 2.10 Berkeley is engaging with the Council via a Planning Performance Agreement ('PPA'). The PPA has facilitated positive and thorough engagement with the Council's Officers prior to the submission of the application, and continues to facilitate engagement working toward the determination of the OPA by September 2026 at the latest.
- 2.11 Berkeley is a major plc housebuilder, with a strong track record of delivery in Horsham with its Highwood development, and at Southwater village specifically via the ongoing construction of the Broadacres development, located adjacent to the south of the Land Northwest of Southwater.
- 2.12 The indicated housing delivery trajectory for the Land Northwest of Southwater anticipates approval of the OPA in September 2026 (consistent with the PPA). It anticipates the submission of first Reserved Matters application in Q4 2027, with a start on site in Q2 2028, and first dwellings completed in Q4 2029.
- 2.13 These represent realistic timescales, provided by an experienced housebuilder with current experience of delivering homes in Horsham.
- 2.14 The housing trajectory has assumed a build-out rate from 2029/30 averaging 83 dwellings per annum, with a maximum of 100 dwellings in a given year. These represent realistic delivery rates, which provide for the full development to be delivered by 2040/41 (i.e., fully within an extended Plan period per our response to Matter 1).
- 2.15 Berkeley currently intends to build-out the development in full. However, this position will remain under review and, should the site or certain phases of development be delivered by others, the delivery rate could be further enhanced via the operation of multiple outlets simultaneously.
- 2.16 The Council's housing delivery assumptions in respect of the site are therefore *sound*.
- 2.17 Indeed, based on Lichfields' Start to Finish (3rd edn.) (2024) research, the anticipated build-out rate falls comfortably within the inter-quartile range for a site of this scale and could reasonably be pushed further.

(c) The reliability of assumptions about windfalls

2.18 No comment. Refer to Berkeley's previous Hearing Statements on this matter.

(d) The robustness of the trajectory

2.19 Berkeley **supports** the robustness of the housing trajectory in respect of the Land Northwest of Southwater (Policy HA3), as intimated in our response to Matters 2(a) and 2(b).

2.20 No comment is made in respect of the robustness of the trajectory outside of this site specifically.

(e) Maintaining adequate housing land supply including a rolling 5 year supply

2.21 No comment.

(f) Headroom, resilience and the mitigation of risk

2.22 Berkeley notes there is presently a lack of 'headroom' in the identified supply of housing.

2.23 The Council's acknowledgement that there is a need for resilience in the supply in **HDCJB05** is welcomed, as is its commitment to explore the extent to which higher growth options could be accommodated within the Plan period (**HDCJB01**) to facilitate this.

2.24 To provide sufficient flexibility, and ensure that the Plan is *effective* (i.e. sound), the Plan should include buffer above the minimum LHN figure. Whilst there is no proscribed buffer to ensure resilience, a sensible starting position would be +10%. The provision of headroom is necessary to make the Plan sound. It is noted that this can be dealt with via modification.

2.25 Any provision of supply toward a buffer to ensure robustness of delivery should be clearly separate to any provision toward unmet need, to ensure there is no double-counting.

(g) Whether the housing requirement should be stepped

2.26 No comment. Refer to Berkeley's previous Hearing Statements on this matter.

(h) Whether additional housing allocations are required, and if so, of what kind / size / timing

2.27 As a consequence of our response to Matters 1 and 2, there is likely to be a need for additional housing allocations. The question of what kind / size / timing is considered to primarily be a matter for the Council.

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