



Examination of Horsham Local Plan Update 2023-2040

Written Statement – Matter 3

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1 Introduction

1.1 Introduction

- 1.1.1 Stantec is instructed by Miller Homes Limited (“Miller Homes”) to submit this Written Statement in response to Matter 3 (Homes to Meet the Needs of All the Community) arising from the Inspector’s Matters and Questions.
- 1.1.2 Miller Homes has a land interest at Lyons Road, Horsham (SHELAA Reference SA492). These representations are made in the context of that interest; however, in accordance with the Inspector’s Guidance Note, they do not seek to promote any specific site for allocation. Instead, they focus on the soundness of the Plan in relation to its approach to meeting housing needs.
- 1.1.3 This statement should be read alongside the representations submitted by Miller Homes in respect of Matters 1 and 2, which identify broader concerns regarding the housing requirement, supply, and delivery assumptions underpinning the Plan.
- 1.1.4 This Written Statement addresses the questions raised by the Inspector in relation to:
- a) The identified level of affordable housing need
 - b) Whether the proportion of affordable housing sought from each site is appropriate
 - c) Whether the mix of homes is appropriate
 - d) The Plan’s approach towards self-build and custom housing
 - e) The Plan’s approach towards homes for older people
 - f) Accessibility policy
 - g) Provision for gypsies, travellers and travelling showpeople
- 1.1.5 In responding to these matters, the focus of this statement is on whether the Plan provides a sufficiently robust, flexible and deliverable framework to ensure that the housing needs of all groups within the community can be met over the plan period.

1.2 Summary of Position

- 1.2.1 It is respectfully submitted that the Plan, as drafted, is not positively prepared, not justified, not effective, and not consistent with national policy in respect of how it seeks to meet the needs of different groups within the community. In particular:
- The evidence base underpinning housing needs is not sufficiently up to date or robust, as highlighted in our response to Matters 1 and 2
 - The Plan adopts an overly rigid approach to how different needs are met
 - There is insufficient flexibility in how sites can contribute to meeting a range of housing needs
 - The approach to older persons housing is not clearly evidenced or effectively delivered



2 Matter 3

2.1.1 The following sections respond to the Inspector's questions in turn, having regard to the requirements of the National Planning Policy Framework.

2.2 a) The Identified Level of Affordable Housing Need

2.2.1 The identified level of affordable housing need is noted. However, as set out in Matters 1 and 2, there are concerns regarding the age, consistency and robustness of the underlying evidence base.

2.2.2 A sound plan should be informed by up-to-date and reliable evidence. Without this, there is a risk that the level of affordable housing need identified does not accurately reflect current or future requirements, particularly in the context of changing market conditions and delivery constraints.

2.2.3 The evidence base does not clearly demonstrate that the identified level of need reflects current conditions or has been tested against alternative scenarios.

2.2.4 As such, the approach is not justified and is not consistent with national policy, as it is not based on up-to-date and proportionate evidence.

2.3 b) Whether the Proportion of Affordable Housing Sought from Each Site is Appropriate

2.3.1 The Plan seeks a consistent approach to affordable housing provision across sites. However, this approach does not fully account for variations in site viability, differences in site characteristics, and delivery and infrastructure constraints.

2.3.2 As identified in Matter 2, delivery assumptions are already subject to uncertainty. A rigid approach to affordable housing provision risks further constraining delivery.

2.3.3 A more flexible approach would better support implementation of the Plan by allowing site-specific viability, delivery constraints and infrastructure requirements to be taken into account. This would help ensure that sites remain deliverable, can come forward in a timely manner, and do not stall due to overly rigid policy requirements.

2.3.4 The Council's evidence acknowledges variability in site viability and delivery constraints, yet this is not clearly reflected in the approach to affordable housing provision.

2.3.5 As such, the approach is not justified and is not effective, as it may constrain delivery and does not provide sufficient flexibility.

2.4 c) Whether the Mix of Homes is Appropriate

2.4.1 The mix of homes should be informed by a robust and up-to-date understanding of housing need.



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2.4.2 In this case, there are concerns that:

- The evidence base is not sufficiently current
- The Plan does not adequately reflect changing demographic trends
- There is limited flexibility in how different types of housing can be delivered

2.4.3 The evidence base does not clearly demonstrate how the proposed mix will respond to changing demographic trends over the plan period or how flexibility will be maintained.

2.4.4 As identified in Matter 1, the Plan does not maximise delivery “as far as possible”, and this is also reflected in its approach to housing mix.

2.4.5 Housing need is diverse and evolving. This reinforces the need for a flexible approach to delivery, as identified in Matters 1 and 2. This includes general housing, affordable housing, and homes capable of meeting the needs of an ageing population.

2.4.6 A more flexible approach to housing mix would:

- Allow sites to respond to changing needs over time
- Support delivery across a wider range of site types
- Reduce reliance on any single form of provision

2.4.7 As such, the approach is not justified and is not effective, as it does not provide a sufficiently flexible or evidence-led framework for delivering an appropriate mix of homes.

2.5 d) The Plan’s Approach Towards Self-Build and Custom Housing

2.5.1 The Plan recognises the role of self-build and custom housing, which is supported in principle.

2.5.2 However, there is limited clarity as to how this will be delivered in practice. As with other aspects of housing provision, delivery will depend on site availability, demand, and flexibility within the Plan.

2.5.3 Without clear mechanisms for delivery, and in the absence of flexibility, there is a risk that provision will not be realised.

2.5.4 The evidence does not clearly demonstrate how identified demand will be met or how delivery will be secured in practice.

2.5.5 As such, the approach is not effective and is not justified.

2.6 e) The Plan’s Approach Towards Homes for Older People

2.6.1 This is a key area of concern.

2.6.2 National policy and guidance make clear that the need to provide housing for older people is critical. However, the Plan relies on evidence which is now dated and does not provide a sufficiently robust or up-to-date assessment of need.



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2.6.3 The evidence base does not clearly quantify the scale or type of provision required, nor does it demonstrate how this will be delivered across the plan period.

2.6.4 Furthermore:

- There are no clearly defined targets or requirements for delivery
- The Plan relies heavily on general housing sites to meet this need without clearly setting out how it will be achieved
- There is limited clarity as to how provision will come forward in practice

2.6.5 As identified in Matters 1 and 2, the Plan lacks flexibility and relies on optimistic assumptions regarding delivery. This issue is particularly acute in relation to older persons housing, where delivery mechanisms are not clearly defined. This further undermines confidence in the Plan's ability to deliver appropriate provision over the plan period.

2.6.6 Older persons' housing needs are diverse. A significant proportion of these needs can be met through well-designed mainstream housing, including accessible and adaptable homes.

2.6.7 The Plan should therefore avoid an overly prescriptive approach that assumes needs must be met through specific or specialist forms of accommodation. Instead, it should support a flexible approach that enables delivery through a range of suitable housing solutions.

2.6.8 A more flexible approach would:

- Support provision through mainstream housing where appropriate
- Improve deliverability across a wider range of sites
- Reduce reliance on uncertain or complex delivery models
- Better reflect the changing needs of the ageing population

2.6.9 As such, the approach is not justified, is not effective, and is not consistent with national policy, as it does not provide a clear or deliverable strategy for meeting identified needs.

2.7 f) Accessibility Policy

2.7.1 The provision of accessible and adaptable homes is an important component of meeting housing needs.

2.7.2 However, as with other aspects of the Plan, policies relating to accessibility should be applied in a way that reflects:

- Site-specific circumstances
- Viability considerations
- Deliverability

2.7.3 Accessible housing needs can often be met through mainstream housing provision. A flexible approach will therefore better support delivery and align with the wider need to ensure the Plan is effective, as identified in Matter 2.



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- 2.7.4 The evidence does not clearly demonstrate how accessibility requirements have been tested against viability or delivery considerations.
- 2.7.5 As such, the approach is not justified and is not effective.

2.8 g) Provision for Gypsies, Travellers and Travelling Showpeople

- 2.8.1 The Plan should ensure that the needs of all groups within the community are appropriately assessed and met.
- 2.8.2 This requires a robust and up-to-date evidence base, clear delivery mechanisms, and a flexible approach to provision. Without this, there is a risk that identified needs will not be effectively addressed.
- 2.8.3 The evidence base must clearly demonstrate how identified needs will be met through deliverable and appropriate provision.
- 2.8.4 In the absence of this, the approach is not justified and is not effective.



3 Conclusion and Recommended Modifications

3.1 Conclusion

- 3.1.1 The Plan's approach to meeting the needs of all the community is not sufficiently robust, flexible, or clearly deliverable. The reliance on dated evidence, combined with a lack of flexibility in how housing needs are met, undermines confidence in the Plan's ability to deliver an appropriate mix of housing across the plan period.
- 3.1.2 This reflects the broader concerns identified in Matters 1 and 2 regarding the Plan's reliance on optimistic assumptions and limited flexibility. The Plan is therefore not positively prepared, not justified, not effective, and not consistent with national policy.

3.2 Recommended Modifications

- 3.2.1 To ensure soundness, the Council should:
- Update the evidence base underpinning housing needs to ensure it is robust and up to date
 - Provide greater flexibility in how different housing needs are met
 - Ensure that policies support delivery across a wider range of sites and housing types
 - Provide clearer and more realistic mechanisms for delivery
- 3.2.2 This should include allowing sites to contribute to meeting a range of housing needs, including through mainstream housing provision where appropriate and deliverable.

