



Examination of the  
Horsham District Local Plan 2023-2040

## **Matter 2: Housing Supply and Head Room**

### **HEARING STATEMENT**

Prepared by Blue Fox Planning Ltd on behalf of:

### **Richborough**

Representation Numbers: 1207902 (1211480 and  
1211486)

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## 1. Introduction

- 1.1 This Hearing Statement has been prepared by Blue Fox Planning Ltd on behalf of Richborough in response to Matter 2: Housing Supply and Headroom.
- 1.2 Richborough currently control one site within Horsham District, this being:
  - Land off Coneyhurst Road, East of Billingshurst
- 1.3 Richborough previously controlled Land at Glebe Farm, Steyning (Strategic Policy HA19), which secured outline permission (DC/21/2233) for up to 265 dwellings, with resolution to grant in September 2024 and permission issued in November 2024. Reserved Matters approval (DC/25/1138) was granted in December 2025.
- 1.4 The Inspector is respectfully asked to note that the Glebe Farm site was subject to an outline application submitted on behalf of Richborough in September 2021. The LPA's reference for the application is DC/21/2233.
- 1.5 On 26th September 2024, Horsham District Council's (HDC) Planning Committee South resolved to grant outline planning permission subject to the completion of the necessary Section 106 Agreement(s). Approval was granted on the 29th November 2024 within a context where water neutrality was still a material consideration. Glebe Farm has subsequently been subject to a Reserved Matters application by Vistry Homes Ltd (DC/25/1138) with permission granted 19<sup>th</sup> December 2025.
- 1.6 Richborough's site off Coneyhurst Road, east of Billingshurst, is not currently proposed to be allocated in the draft Local Plan but has been subject to representations at previous stages of Plan preparation including at Regulation 18.
- 1.7 It is relevant to note that on the opposite side of the railway to the north is the proposed under Strategic Policy HA4: Land East of Billingshurst. The Inspector's attention is respectfully drawn to the fact that, at Regulation 18 stage, the Local Plan allocated land both sides of the railway; that is to say the current HA4 allocation AND land that is now under Richborough's control. This is illustrated in **Figure 1**, below.

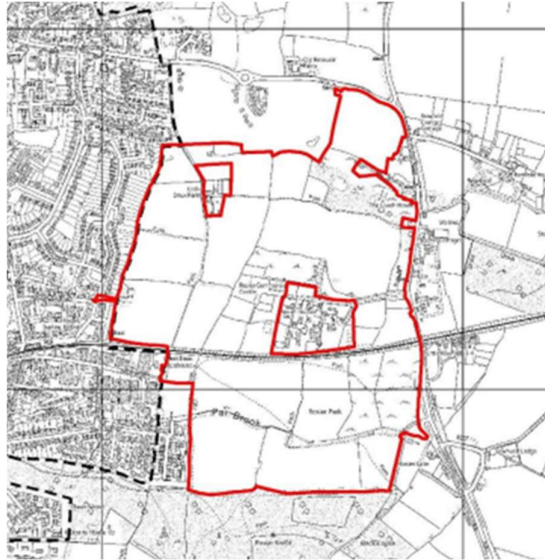


Figure 1: Land East of Billingshurst (Little Daux) – Regulation 18 Horsham Local Plan, February 2020.

- 1.8 We fully respect that, at this stage, Richborough’s site, Land off Coneyhurst Road, Billingshurst, is not being considered as a Site Allocation, however as per your letter to the Council (DJB01-Inspectors-response-to-HDCJB01) you note that *“The new work will involve ... establishing the housing requirement and finding additional opportunities for development to meet identified needs...”* (underlined for our emphasis). Land off Coneyhurst Road, Billingshurst is available, achievable and deliverable for development with Richborough having a proven track record of site delivery within Horsham District.

## 2. Matter 2 - Housing Supply and Headroom

### a) The housing trajectory as proposed

- 2.1 The Council's housing trajectory (H08 and Appendix 1 to HDCJB01) has been updated during the examination and remains under review. It is therefore not a settled evidence base and cannot be relied upon as a stable basis for sound conclusions
- 2.2 The latest trajectory identifies 15,430 dwellings against a requirement of 17,828, resulting in a shortfall of approximately 2,398 dwellings—a material deficit confirmed by the Council's own evidence.
- 2.3 As set out in Matter 1, the requirement is based on increasingly out-of-date assumptions. A shortfall against this reduced figure further demonstrates that the Plan fails to meet identified housing need. Paragraph 62 of the December 2024 NPPF requires plans to address both local and unmet need. The shortfall must therefore be considered in this wider context.

### Completions

- 2.4 Completions of 452 dwellings in 2023/24 and 320 in 2024/25, though affected by water neutrality, provide the baseline for assessing delivery. The trajectory indicates an average of c.908 dpa, masking low early delivery and reliance on later years. This falls below both the requirement (c.1,049 dpa) and Standard Method (c.1,300+ dpa), evidencing a persistent gap.
- 2.5 Only 2,928 dwellings are expected in the first five years against a requirement of c.5,245, creating a shortfall of over 2,300 dwellings. Delivery is heavily backloaded, with over 80% in years 6–17, with limited early contribution from strategic sites and windfalls.

### Commitments

- 2.6 The Council defines commitments as including all planning permissions and allocations within made development plans. Not all commitments carry the same level of certainty, and this should be reflected in the trajectory.
  - Category A sites (2,611 dwellings) are generally deliverable but remain subject to market and infrastructure constraints.
  - Category B sites (4,526 dwellings) and Neighbourhood Plan allocations (916 dwellings) lack clear evidence of delivery within five years.
  - Small sites (175 dwellings) are inherently less predictable and subject to market variation introducing uncertainty.

- 2.7 A trajectory which is backloaded and under-delivering early raises clear concerns under NPPF paragraph 78.

#### **Smaller Site Allocations**

- 2.8 Smaller allocations (1,730 dwellings) contribute to supply. Whilst some of these sites have since gained planning permission and are now counted within commitments, allocation status alone does not provide certainty of delivery.
- 2.9 Delivery is sensitive to market conditions, landowner intentions and viability, and the evolving status of sites during examination highlights this uncertainty. Whilst valuable, such sites should be treated with appropriate caution.

#### **Windfall Allowance**

- 2.10 The trajectory includes 1,440 windfall dwellings, representing a material component of supply. Windfalls make no meaningful early contribution and reinforce the backloaded nature of the trajectory.
- 2.11 Windfall delivery is inherently less predictable than allocated or permitted sites, particularly over longer plan periods. National policy recognises that windfall sites can make an important contribution to housing delivery and should be supported where appropriate (NPPF paragraph 73(d)). However, paragraph 75 requires that any windfall allowance is supported by compelling evidence that such sites will provide a reliable source of supply, having regard to historic delivery rates and expected future trends.
- 2.12 It is not clear that the Council's evidence has been updated or demonstrates continued delivery at the assumed scale. Windfalls are inherently less predictable and should be treated cautiously.

#### **Shortfall**

- 2.13 The trajectory shows a shortfall of approximately 2,398 dwellings against the proposed requirement. This is a material shortfall. A plan which does not demonstrate how its requirement will be met is unlikely to be positively prepared or effective.
- 2.14 The Council's own evidence acknowledges that *"there cannot be complete certainty of delivery over the plan period."* In this context, it is important that the housing strategy is sufficiently robust and flexible to accommodate uncertainty. The trajectory includes no meaningful headroom to account for delays, non-implementation or market changes. Any slippage would increase the deficit indicating lack of resilience.
- 2.15 The trajectory is characterised by early under-delivery, backloading and reliance on uncertain sources, and fails to provide a robust basis for meeting housing need and fails the tests of soundness under paragraph 36 of the NPPF.

### **3. b) The reliability of housing delivery assumptions / allowance for non-delivery**

- 3.1 The Council relies on historic delivery, but past performance does not demonstrate future delivery at the assumed scale or timing. Historic delivery occurred under materially different policy, market and infrastructure conditions and cannot substitute for site-specific evidence.
- 3.2 The Council also refers to delivery on existing strategic allocations, but these sites already have planning permission and are progressing. This is materially different from the current trajectory, which relies heavily on unconsented or early-stage sites.
- 3.3 Historic comparisons therefore do not provide a reliable basis for forecasting delivery from the current pipeline, which is subject to greater uncertainty and dependency on future approvals.
- 3.4 The Council's assumptions are informed by promoter input and "sense checked" against experience. While engagement is appropriate, this is not a transparent or independently verifiable methodology.
- 3.5 The Council acknowledges that "*there cannot be complete certainty of delivery over the plan period.*" In this context, reliance on promoter-led assumptions adds material risk into the trajectory as any number of currently unknown things can affect delivery.
- 3.6 A similar approach is applied to smaller sites. While this may indicate broad trends, it does not provide a reliable forecast of future supply. Small sites are particularly sensitive to market conditions, landowner decisions and viability, and there is limited evidence that assumptions have been robustly tested. Historic completion rates (c.60%) indicate a significant proportion of permissions do not deliver, further highlighting uncertainty. The trajectory is characterised by early under-delivery, backloading and reliance on uncertain sources, and fails to provide a robust basis for meeting housing need.

### **c) The reliability of assumptions about windfalls**

- 3.7 The Council relies on a Windfall Study (H09) to justify 120 dwellings per annum. While NPPF paragraphs 73(d) and 75 support windfalls in principle, they require compelling evidence that such supply is reliable.
- 3.8 The evidence is based primarily on historic delivery since 2012 and has not been updated to reflect current policy or market conditions. Historic trends alone do not demonstrate that delivery will continue at the scale assumed.

3.9 The Council refers to a “worst-case scenario” of 120 dwellings per annum, but it is unclear how this has been defined or evidenced. The allowance equates to c.1,440 dwellings over the plan period—a material proportion of supply (c.10% of need; c.8% of the requirement). Whilst some windfall contribution is likely, the evidence does not demonstrate that it will provide a consistent or reliable source of supply, particularly given its reliance in later years.

3.10 The Council has therefore not demonstrated that the allowance is supported by compelling evidence, as required by paragraph 75 of the NPPF, and it should be treated with caution

#### **4. d) The robustness of the trajectory**

4.1 The trajectory is informed by developer engagement and updated appendices, but this does not provide a transparent or independently verifiable evidence base. Assumptions are subject to optimism bias, and it is unclear how they have been tested or adjusted to reflect delivery risk, infrastructure constraints or market conditions. The evidence base remains unsettled and cannot be relied upon as robust.

4.2 Updated trajectory appendices (February 2026: HDCJB04a and HDCJB05a) provide a revised position but do not constitute a consolidated Housing Delivery Study or clearly explain the methodology underpinning delivery assumptions.

4.3 The Council also refers to historic completion rates, suggesting supply has regularly exceeded 1,000 dwellings per annum since 2011. However, delivery exceeded 1,000 dwellings in only 3 of the last 14 years, which is not representative of overall performance.

4.4 More recent delivery has been significantly lower (654 in 2021–22, 396 in 2022–23, 452 in 2023–24 and 320 in 2024–25). Whilst influenced by water neutrality, this demonstrates sensitivity to changing conditions. Reliance on selected high-delivery years therefore does not provide a robust basis for forecasting future supply.

4.5 Overall, the Council’s case relies heavily on developer engagement, promoter-led assumptions, and a selective interpretation of past delivery trends, all within the context of an evolving evidence base. Whilst engagement with developers is both common and appropriate, caution is required given that unforeseen constraints and changing circumstances may arise, which could materially affect delivery trajectories. These factors introduce material uncertainty and do not demonstrate that the trajectory is deliverable as assumed. Accordingly, it has not been demonstrated that the housing trajectory is sufficiently robust for the purposes of plan making.

## **5. e) Maintaining adequate housing land supply including a rolling 5-year supply**

- 5.1 The Council states the trajectory contains a robust mix of sites capable of supporting a rolling five-year supply. However, this is not clearly demonstrated. Paragraph 78 of the NPPF requires a minimum five-year supply of *deliverable* sites, with clear evidence that completions will begin within five years.
- 5.2 The trajectory relies materially on sites which do not meet this definition, including those without permission, at pre-application stage, or dependent on future approvals. It is therefore unclear that the identified supply is deliverable.
- 5.3 While 3,558 dwellings have full permission, delivery is not guaranteed and remains subject to market conditions, infrastructure provision and build-out rates. Sites at pre-application stage are not deliverable, and sites with live applications or resolutions remain subject to determination, legal agreements and conditions, introducing further uncertainty not fully reflected in the trajectory.
- 5.4 The Council's reliance on an emerging "pipeline" highlights that delivery is not yet secured. A pipeline of potential sites is not equivalent to a demonstrable supply. Reliance on future permissions and evolving site progression therefore does not provide a robust basis for demonstrating a five-year supply.
- 5.5 The Council argues that a stepped trajectory is necessary to support a rolling five-year supply by allowing time for permissions to be secured and strategic sites to commence development. However, this approach defers delivery in the early years and relies on higher delivery rates later in the plan period.
- 5.6 As set out in Section (a), only 2,928 dwellings are identified in the first five years against a requirement of approximately 5,245, confirming a significant shortfall. In summation these factors introduce material uncertainty and do not demonstrate that the trajectory is sufficiently robust or deliverable for plan-making in accordance with paragraph 78 of the NPPF.

## **6. f) Headroom, resilience and the mitigation of risk**

- 6.1 The Council acknowledges the need for resilience, yet the trajectory includes no meaningful headroom and identifies a shortfall of approximately 2,398 dwellings. The Plan is therefore already operating at a deficit, contrary to national policy which requires flexibility to respond to delays, non-implementation and market changes. Without any contingency or buffer, any slippage—whether from delays to strategic sites or market factors—would further increase the shortfall
- 6.2 The Council indicates that it will explore low, medium and high growth scenarios to determine whether a higher level of provision can be achieved. This work remains ongoing and demonstrates that the housing requirement and overall strategy have not yet been finalised.

6.3 A Local Plan should not rely on future work to address deficiencies; it must be sound at examination, based on a clearly defined and evidenced strategy. The absence of a preferred strategy, combined with reliance on uncertain supply and no headroom, undermines the Plan's robustness. It has therefore not been demonstrated that the housing strategy is sufficiently robust, resilient or capable of mitigating delivery risk, and it cannot be regarded as effective.

**7. g) Whether the housing requirement should be stepped**

7.1 The Council attributes the need for a stepped trajectory to the legacy impacts of water neutrality. Whilst accepted historically, this does not justify embedding suppressed delivery across the plan period. The issue for the Examination is whether the Plan responds to current and future circumstances, rather than continuing to reflect historic constraints.

7.2 The Council confirms that water neutrality constraints have now been removed. Whilst there may be short-term effects on delivery, this does not justify prolonged suppression of delivery within the trajectory.

7.3 The Council refers to evidence that major developments take c.3.5 years from permission to first completions. While lead-in times are typical, this does not justify the stepped trajectory. It relates to consented sites, does not reflect site variability, and does not justify delaying delivery across the plan as a whole. Nor is it clear why the current pipeline deficit cannot be addressed through the allocation of additional deliverable sites or by bringing forward sites capable of early delivery.

7.4 Experience at Glebe Farm, Steyning demonstrates that sites progressed even under water neutrality constraints. While impactful, this does not justify suppressing delivery across the plan.

7.5 The Council proposes that Years 1–2 reflect actual delivery (452 and 320 dwellings). These reflect exceptional circumstances and embedding them carries forward under-delivery and depresses early provision. The trajectory remains subject to further updates, indicating it is not yet finalised. If Year 3 remains uncertain, the approach cannot be regarded as robustly evidenced.

7.6 Delivery remains suppressed through Years 1–7 (c.734 dpa in Years 4–7) without clear justification. Even if a stepped approach were accepted, the scale and duration of suppression are not evidenced. Delivery then increases to 1,365 dpa in Years 8–17, exceeding historic averages and achieved only in limited years. There is no clear evidence this level can be sustained.

- 7.7 The Council suggests the stepped approach “neutralises” historic under-delivery. This is not sound: embedding lower early delivery perpetuates under-supply rather than addressing it. The appropriate response is to increase supply and bring forward deliverable sites. The trajectory is therefore reactive rather than positively prepared, deferring delivery rather than meeting need.
- 7.8 The Council acknowledges that additional allocations are required to meet need, address unmet need and provide headroom. This confirms the submitted Plan is not currently capable of doing so. Whilst low, medium and high growth scenarios are proposed, no preferred strategy has been identified.
- 7.9 In the context of NPPF paragraph 63, this reinforces the need to respond to both local and unmet need and align with the latest Standard Method (as set out in Matter 1). The low growth option fails to meet the requirement, the medium option provides limited headroom, and only the high growth option (c.13% headroom) begins to provide a meaningful buffer.
- 7.10 Consistent with Matter 1, only the high growth option aligns with a positively prepared strategy under paragraph 36 of the NPPF. Given the uncertainty in the trajectory—including reliance on unconsented sites, windfalls and optimistic assumptions—a higher level of headroom is necessary.
- 7.11 While a mix of smaller and strategic sites is appropriate, sufficient deliverable sites must support early delivery and reduce reliance on larger sites with longer lead-in times. Land off Coneyhurst Road is available, achievable and deliverable, and represents a sustainable extension capable of contributing to early and medium-term deliver. Its previous identification at Regulation 18, alongside land on both sides of the railway, confirms its suitability.
- 7.12 The Council’s evidence confirms additional allocations are required, the scale of growth remains unresolved, and only the higher growth option provides meaningful headroom. A stepped requirement is therefore not justified and results in a strategy which is not positively prepared.