

**Examination Statement
2026
Matter 2 –Housing Supply & Headroom**

Horsham Local Plan

Representations on behalf of Taylor Wimpey Strategic Land, a
division of Taylor Wimpey UK Ltd

ID: 1207547 (in part)

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Lucid
Planning

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1. Introduction

- 1.1 This Statement has been prepared by Lucid Planning on behalf of our Client, Taylor Wimpey Strategic Land, a division of Taylor Wimpey UK Ltd (TW), who has an interest in the land north of Rectory Lane, Ashington (SHELAA Ref SA524, in part). This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 Representations have been made on behalf of our Client throughout the production of the emerging Local Plan and these representations expand upon earlier representations. While efforts have been made not to duplicate the content of previous representations, this Statement draws on previous responses where necessary.
- 1.3 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 These representations respond to the Inspectors' 2026 MIQs but do not necessarily respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.5 These representations have been considered in the context of the relevant NPPF that the District Plan is being examined under - NPPF September 2023 - and tests of 'soundness' as set out at paragraph 35 of that NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2. Response to Matter 2 – Housing Supply & Headroom

- a. The housing supply trajectory as proposed**
- b. The reliability of housing delivery assumptions / allowance for non-delivery**
- c. The reliability of assumptions about windfalls**
- d. The robustness of the trajectory**
- e. Maintaining adequate housing land supply including a rolling 5 year supply**
- f. Headroom, resilience and the mitigation of risk**
- g. Whether the housing requirement should be stepped**
- h. Whether additional housing allocations are required, and if so, of what kind / size / timing**

Introduction

- 2.1 Matter 2 must be read alongside Matter 1. If the housing requirement does not clearly embed an appropriate LHN for the district for the whole Plan period, and an allowance for unmet need in both the Northern West Sussex HMA and the Coastal West Sussex and Brighton HMAs, the calculation of headroom and supply resilience will inevitably be distorted. The correct sequencing is: (i) establish the housing requirement (including any unmet need allowance), and only then (ii) assess supply and contingency above that figure.

A.- D. The Housing Supply Trajectory

- 2.2 Pre-water neutrality, Horsham District Council (HDC) had a strong track record of delivering housing, as demonstrated by Table 3 of Matter 2 Topic Paper: Housing Supply and Headroom. Against an average requirement of 800 dpa set out in the adopted Horsham District Planning Framework (November 2015) completions were as follows:
- 1,201 in 2015/16
 - 1,125 in 2017/18
 - 1,369 in 2018/19
 - 955 in 2019/20

- 2.3 Further, HDC also has a history of positive, constructive engagement with developers through pre-app engagement and at planning application stage. This engagement can ensure that barriers to delivery are understood.
- 2.4 That said, the robustness of the supply trajectory must be considered in the context of:
- Increasing build-out times on larger strategic sites
 - Infrastructure dependencies
 - Market absorption rates; and
 - The potential for slippage in early years of the Plan.

E. Maintaining Adequate Housing Land Supply Including a Rolling 5 year Supply

- 2.5 It maybe that the water neutrality issue determined the size of sites allocated in the Submission Local Plan: large strategic sites that could provide on-site water neutrality mitigation and small sites that could be covered by the strategic mitigation scheme, formerly best known as SNOWS. It is noticeable that there is a lack of small and mid-range sites. Such sites would assist in providing an adequate housing supply over the Plan period, but would also assist HDC to achieve an initial five year land supply and maintain a rolling five year supply.
- 2.6 Once the final housing requirement is decided, it is clear that:
- Additional sites will be required to be allocated;
 - Those allocations will need to cover a variety of size of sites and locations to provide a five year land supply initially on adoption and then rolling forward;
 - The location of allocations will need to be in line with the spatial strategy, and;
 - relate to neighbouring unmet housing need.

F. Headroom, Resilience and the Mitigation of Risk

- 2.7 It is noted that larger strategic allocations often require significant lead-in periods. Where a substantial proportion of the anticipated supply arises from such sites, delivery risk is inherently elevated. In that context, headroom (a theoretical excess of housing supply over the housing requirement) is not over-provision but a necessary contingency. This strengthens the Plan's resilience and decreases the risk of falling below a rolling five-year housing land supply.
- 2.8 Within this context, there was some discussion at the Mid Sussex Examination about headroom. Although not a mandatory requirement, the Inspector asked Mid Sussex District Council to consider a figure for headroom to ensure the Plan is resilient.
- 2.9 HDC should also consider a provision of adequate headroom to protect the Plan from becoming out of date and maintain a rolling five-year housing land supply, particularly if delivery rates of large strategic sites underperform trajectory assumptions for reasons that are not currently anticipated to ensure the Plan is positively prepared and effective.

G. Whether the Housing Requirement Should be Stepped

- 2.10 Given the impacts that water neutrality has had on HDCs housing provision over the last five years, it is reasonable for HDC to have a stepped approach to delivering housing. However, that should be tempered and tested against ensuring an array of different size sites are brought forward to make up the housing requirement particularly in the first five years of the Plan, and to provide a rolling five year supply, over and above the housing requirement set out in the Submission Local Plan of 13,212 homes (777 dpa).
- 2.11 If a stepped requirement is adopted, it must:
1. Clearly identify the total housing requirement over the plan period
 2. Explicitly include the defined unmet need allowance

3. Include contingency headroom, if required.

H. Whether additional housing allocations are required, and if so, of what kind / size / timing

2.12 TW consider it necessary for additional sites to be allocated in order to address an increased housing requirement to satisfy HDCs LHN requirement and some of the unmet need in the north and south HMAs.

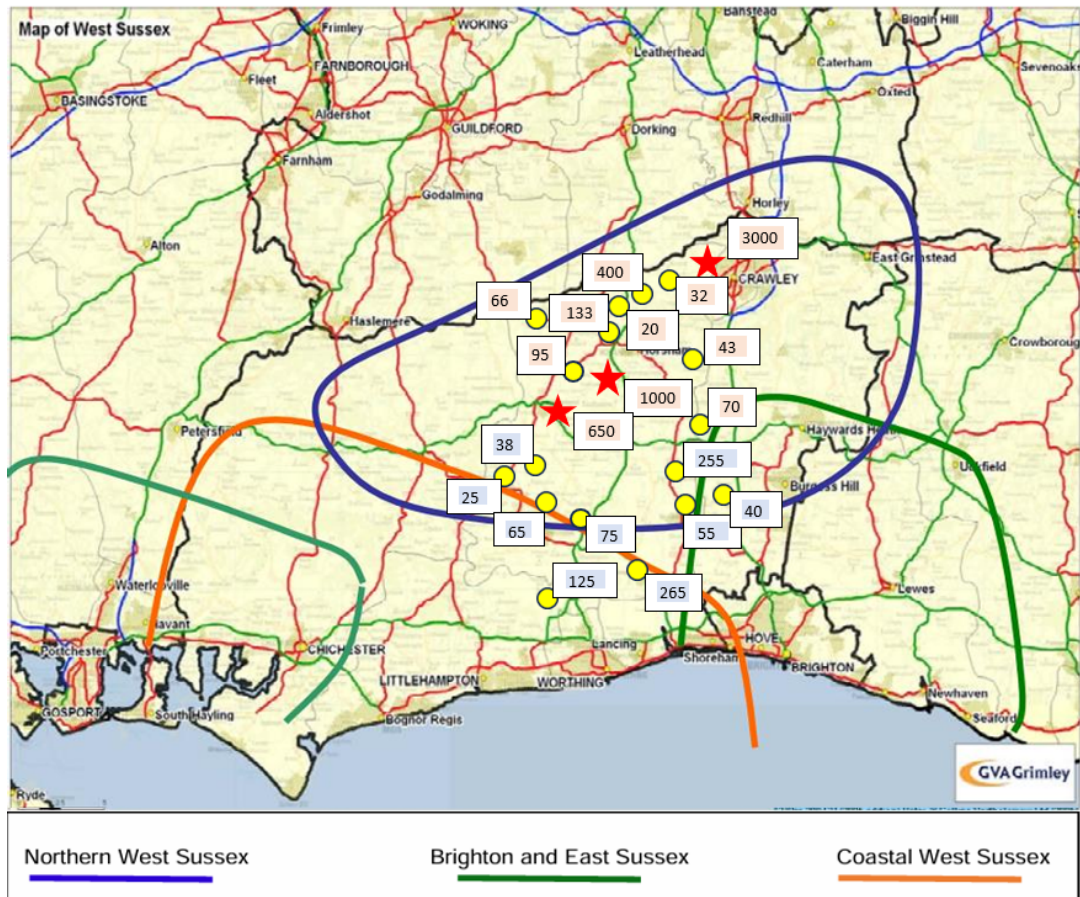
2.13 TW set out in its response to Matter 1: Housing Requirement, a total requirement of:

Plan Period	2023-2042
A./B. HDC LHN minimum, 15 post adoption Plan period	17,309
C. Crawley 50% Unmet Need Contribution	3,753
C. Worthing 26% unmet Need Contribution	3,750
E. Total Housing Requirement	24,812
Annualised Requirement	1,654 dpa

2.14 For comparison, the December 2024 LHN for HDC alone is 1338 dpa.

2.15 In order to provide an initial five year land supply and a rolling five year supply, the focus should be on allocating small and medium size sites in locations where there is most need.

2.16 When plotted, it is clear that the Submission Plan has a bias to development to the north of the district. Using the A272 as a crude divide, the current spatial strategy looks like this:



	Proposed Site Allocations in Submission Plan
North of A272 (sites shown in pink in diagram above)	5499 new homes (including all 3 strategic sites)
South of A272 (sites shown in blue in diagram above)	943 new homes

2.17 It is imperative that Horsham, as a relatively unconstrained district with excellent transport links to the south coast and having settlements with a functional relationship to those on the south coast, should accommodate an appropriate proportion of the unmet needs within its Local Plan. Furthermore, by accommodating such homes in Horsham district, there would be great opportunity to provide a range of type and sizes of homes (such as family

housing) that provide for those who work on the south coast but cannot find suitable or desired accommodation.

- 2.18 In addition to rectifying the imbalance of the north-south divide in the district, to provide for its own needs and unmet housing needs of Worthing/Coastal West Sussex authorities, a review of the Submission Plan spatial strategy/settlement hierarchy needs to be undertaken when considering additional allocations. It is noted, for example, that the list of allocations includes four strategic allocations at Tier 4 “Smaller Villages” (i.e. Rusper, 32 dwellings; Small Dole, 80 dwellings; Thakeham, 65 dwellings; and Lower Beeding, 43 dwellings) whilst higher tier settlements such as Ashington, a Tier 3 settlement, has only been allocated a limited number of dwellings comparative to its size and level of services and facilities.
- 2.19 There is clearly more opportunity for sustainable development at Tier 3 settlements, particularly in the south of the district, such as at Ashington which can assist delivering housing for *all three* HMAs.
- 2.20 Progress on the TW Ashington site has continued through the hiatus of water neutrality. As such, this site (part of SHELAA Ref SA524) is about to be submitted for pre-app advice with application submission in Q3 2026. On this basis, a housing trajectory has also been submitted to HDC for its 2026 Local Plan site assessment process. This demonstrates that this site could assist HDC to meet housing requirement and more importantly, assist in its initial five year land supply.
- 2.21 Such a strategy would also significantly improve meeting need for affordable housing in the district, providing for more vulnerable Horsham residents.