

Horsham Local Plan Examination

Matter 2 – The Housing Supply

Introduction

1. This Hearing Statement has been prepared by Croudace Homes with respect to Matter 2 of the Examination of the Horsham Local Plan 2023-2040 (“the Plan”).
2. It is noted that initial Hearing Sessions took place in December 2024, and that the Hearing Statements prepared to inform the initial sessions can continue to be relied upon. With respect to the Housing Supply, we note that this was covered by Matter 8 within the initial Hearing Sessions.
3. On this basis and in accordance with the guidance issued by the Inspector with respect to the upcoming Hearing Sessions, this Statement focuses specifically on the questions identified and does not repeat points identified within Croudace Homes’ Matter 8 Hearing Session (dated November 2024), noting that the Inspector will have regard to the November 2024 Hearing Statement.
4. We do not answer each of the questions identified for discussion as part of the Matter 2 Hearing Session within this Statement, but instead focus on those questions where we have additional information to submit.

Question f. Headroom, resilience and mitigation of risk

5. Paragraphs 11b and 61 of the National Planning Policy Framework (“the Framework”)¹ are clear that planning policies should identify a ‘minimum’ housing requirement for the area. Therefore, the housing supply must ensure that the Council is able to, at least, deliver this minimum number.
6. Paragraph 25 of the Council’s Housing Supply and Headroom Topic Paper² recognises that there is a need to ensure that risks to supply are minimised. Table 10 of the document subsequently identifies growth options, with a low growth option providing headroom of -28 dwellings (i.e. a shortfall against the minimum housing requirement), a medium growth option providing headroom of 1,472 dwellings (8%) against the minimum requirement and a high growth option providing headroom of 2,272 dwellings (13%) against the minimum requirement.
7. Given the imperative of ensuring that the minimum housing requirement is met, as per the provisions of the Framework, it is important that the Council leaves no stone unturned in maximising its housing delivery to reduce risks of not delivering against the Plan’s requirement (noting that this is significantly short of the Government’s Local Housing Need for Horsham District).

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

8. As identified by the Council at Table 1 of its Housing Supply and Headroom Topic Paper, there is a clear need for additional allocations to be made for the Plan to meet its minimum housing requirement.
9. This is acknowledged by the Council at paragraph 31 of the Housing Supply and Headroom Topic Paper

¹ December 2023 version, noting that this was the latest version in place when the Plan was submitted for Examination in July 2024

² Document reference HDCJB05

10. As identified by the Council at paragraph 3 of the Housing Supply and Headroom Topic Paper, the completions during the period 2023/4-2024/25 are significantly below the annual average housing need for Horsham District, even with unmet needs from adjoining authorities not taken into account (see our Matter 1 Statement). Whilst the Council has not yet published the data, it is reasonable to assume that the under-delivery will have continued into the 2025/26 year in light of the Water Neutrality issues that has affected housing delivery within Horsham District faced until November 2025.
11. Therefore, it is clear that the Council requires new allocations that can deliver in the first few years of the Plan period to address the significant early shortfall arising within the Plan period.
12. In terms of identifying further sites, it is critical that regard is had to paragraph 31 of the Framework, which states that *“The preparation and review of all policies should be underpinned by relevant and up to date evidence. [...]”* (Emphasis added)
13. The latest Site Assessment information that supports the Plan is dated December 2023. Since this time, there will have been material changes that would influence the assessment of many sites put forward for development. For example, Croudace Homes’ planning application for Land East of Charlwood Drive, Henfield³ was identified not to be subject to any technical constraints and no objection was raised by the Council’s Landscape Officer. This differs from the assessment of the site as part of a wider land parcel⁴ within the Council’s December 2023 Site Assessment.
14. If the Council is to include further site allocations within the Plan, as it has identified it needs to, it must ensure that such a process is based on up-to-date evidence to avoid a soundness failing by virtue of a conflict with the Framework.
15. Noting that paragraph 23 of the Council’s Housing Supply and Headroom Topic Paper states that developers have been contacted, it is notable that no contact has been made with Croudace Homes despite the Council having raised no technical or landscape objections to its planning application. This indicates that the Council has not updated its Site Assessment work or based any decisions made to date regarding new allocation upon the latest evidence.

³ Application reference DC/24/1932

⁴ Site Assessment ref. SA005



Nexus Planning

Reading
Suite 2, Apex Plaza
Forbury Road
Reading RG1 1AX

T 0118 214 9340

nexusplanning.co.uk