



Horsham District Local Plan 2023-2040 Examination

Hearing Statement submitted on behalf of
Miller Homes

Matter 5a: Session for site promoters /
developers / agents

September 2026

Prepared for:
Miller Homes Ltd

Prepared by:
Stantec

Project Number:
333103177

Registered Office: Stantec House, Kelburn Court,
Birchwood, Warrington, WA3 6UT

Office Address: The Blade, Abbey Square,
Reading, RG1 3BE

Document Control Sheet

Issued by	Stantec UK Limited	+44 118 943 0000
	stantec.com/uk	
Client	Miller Homes	
Project name	Horsham District Local Plan 2023-2040 Examination	
Title	Matter 5a: Session for site promoters / developers / agents	
Doc ref	333103177/A5	
Project number	333103177	
Status	Final	
Date	21/09/2026	

Document production record

Issue number	P1a	Name
Prepared by		Neve Lansdown and Ilaria Sutton
Checked by		Rebecca Rogers
Approved by		Mark Owen

Document revision record

Issue number	Status	Date	Revision details
P1	Draft	21/09/2026	Client sign-off
P1a	Final	25/09/2026	

Stantec UK Limited has prepared this report in accordance with the instructions of the above-named client for their sole and specific use. Any third parties who may use the information contained herein do so at their own risk.



Contents

Document Control Sheet ii

1 Introduction 4

1.2 Issues covered in this Statement..... 4

2 Matter 5- The Spatial Strategy and Site Selection..... 5

2.1 Matter 5(a)(iii)- Housing Delivery: whether the range of sizes and types of site would ensure that: 5

2.2 Matter 5(a)(iii)- Housing Delivery: whether the range of sizes and types of site would ensure that: 5

Figures

No table of figures entries found.

Tables

No table of figures entries found.

Appendices

Appendix A



1 Introduction

1.1.1 This Statement is prepared on behalf of Miller Homes Limited. Stantec is presenting evidence in respect of Matter 5a (Session for site promoters / developers / agents).

1.1.2 Miller Homes Limited is a leading national housebuilder with over 90 years' experience in delivering high-quality and sustainable residential developments. Miller Homes Limited understands and knows the local area well with interests located across the wider District.

1.2 Issues covered in this Statement

1.2.1 This Hearing Statement provides Stantec's response relating to Matter 5a:

Matter 5a: Session for site promoters / developers / agents

iii. Housing delivery: whether the range of sizes and types of site would ensure that:

- **enough homes would come forward at the right time during the plan period to meet the housing requirement**

1.2.2 As highlighted above, this Statement focuses specifically on the second bullet point of part (iii).

2 Matter 5- The Spatial Strategy and Site Selection

Matter 5a: Session for site promoters / developers / agents

2.1 Matter 5(a)(iii)- Housing Delivery: whether the range of sizes and types of site would ensure that:

- **different housing needs and aspirations would be adequately met**

2.1.1 No comment.

2.2 Matter 5(a)(iii)- Housing Delivery: whether the range of sizes and types of site would ensure that:

- **Enough homes would come forward at the right time during the plan period to meet the housing requirement**

2.2.1 As set out in Stantec's response to the Main Modifications consultation, it is considered that there is a lack of a range of sites which will be delivered over the entirety of the plan period to adequately meet different housing needs and aspirations.

2.2.2 The Council's 'Housing Trajectory and Five-Year Housing Land Supply Update' (August 2026) (ref: HDCJB22) indicates that strategic sites will account for an increasingly significant proportion of housing delivery over the plan period, with delivery expected to commence in the latter part of the 2020s and increase substantially thereafter. Whilst strategic sites form an important part of the Council's supply strategy, their delivery is typically subject to a greater degree of uncertainty due to factors such as associated infrastructure provision, site-specific constraints, viability considerations, market conditions, and phasing.

2.2.3 The 'Horsham Housing Delivery Study Update' (July 2026) (ref: HDCJB20) notes that sustaining a growth rate of approximately 2.2% per annum between 2028 and 2035 would be "*challenging but not necessarily unrealistic*" and finds that the proposed district-wide phasing delivery trajectory appears achievable. Nevertheless, our client notes that this conclusion is predicated on a number of strategic allocations successfully coming forward in line with the assumptions underpinning the trajectory.

2.2.4 This reliance is particularly significant given the size and complexity of several of the proposed allocations. In our client's view, delivery expectations, such as from Adversane, should be moderated and a greater proportion of completions should be moved towards the latter stages of the plan period to provide a more realistic assessment of deliverability. This is especially relevant given the Council's own acknowledgement that the Adversane scheme represents a significant undertaking, describing it as "*a standalone new settlement, the first new settlement developed in Horsham District in living memory*" (Strategic Policy HA (NP1)).

- 2.2.5 The Council's housing trajectory indicates that delivery falls below the stepped requirement in the latter years of the Plan period, particularly from 2035/36 onwards, despite the assumed contribution from strategic allocations. This demonstrates the importance of supplementing large strategic sites with a greater number of small and medium-sized allocations capable of coming forward at different points throughout the Plan period.
- 2.2.6 A more diverse supply of sites, including those of small and medium size, would increase flexibility, improve resilience against delays on individual strategic sites. Furthermore, it will provide greater confidence that the stepped housing requirement, including the requirement for 1,601 dwellings per annum between 2033/34 and 2039/40, can be maintained throughout the Plan period.
- 2.2.7 The Plan also relies upon a significant contribution from windfall development. The Council's Windfall Study was prepared in January 2024 and is based on delivery data covering the period 2012/13 to 2022/23.
- 2.2.8 The most recent Authority Monitoring Report (published December 2025) does not publish actual windfall delivery figures for 2023/24 and 2024/25 and instead relies upon an assumed future allowance from year 4 onwards. As a result, there is no published up to date evidence demonstrating that the proposed allowance of 1,440 dwellings remains justified by recent delivery trends.
- 2.2.9 Paragraph 72 of the NPPF (2023) states that, where an allowance is made for windfall sites as part of the identified supply, there should be "*compelling evidence*" that they will provide a reliable source of supply. The NPPF further requires that any allowance should be realistic having regard to the land availability assessment, historic windfall delivery rates and expected future trends.
- 2.2.10 The lack of compelling and up-to-date evidence required by Paragraph 72 of the NPPF means that there is uncertainty as to whether the windfall contribution will be realised over the Plan period. Reliance on windfall development should not be viewed as an alternative to identifying additional suitable and deliverable allocations capable of providing greater certainty within the housing trajectory.
- 2.2.11 Accordingly, our client considers that the Plan is not sound when assessed against Paragraph 35 of the NPPF (2023). In particular, the Plan is not justified, as the evidence does not demonstrate that the proposed mix of site sizes and types represents the most appropriate strategy for meeting housing needs throughout the Plan period. Furthermore, the Plan is not effective, as it has not been shown that sufficient homes will come forward at the right time to meet the stepped housing requirement. The housing trajectory is heavily reliant on a limited number of large and complex strategic allocations, together with a significant windfall allowance, both of which are subject to uncertainty and delivery risks. This approach reduces the flexibility

and resilience of the housing supply and limits the Plan's ability to respond to delays or changing circumstances over the plan period.

- 2.2.12 To evidence this point further, the Council confirms within 'Matter 2 Housing Supply and Headroom Topic Paper' (ref: HDCJB05) that, as of March 2026, 211 units have been completed on the Land North of Horsham (Mowbray) scheme. This follows adoption of the plan supporting the allocation in November 2015 and an outline application being submitted in August 2016. Therefore, some 11 years after allocating the site and 10 years after an outline application was submitted, only 211 units have been delivered. Against this backdrop, the Council's assumption that at least 1,425 units will be delivered on the Adversane site by 2040, set out within the Council's 'Schedule of Suggested Main Modifications to the Submission Local Plan' (ref: MMJB01), appears highly optimistic and raises significant questions regarding the deliverability of the projected housing trajectory.
- 2.2.13 A more balanced strategy, incorporating a greater number of small and medium-sized allocations alongside strategic sites, would provide a broader and more robust supply of housing, increasing confidence that the stepped housing requirement can be maintained throughout the Plan period.