



Horsham  
District  
Council

# Housing Delivery Test Action Plan

April 2025

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# 1 Introduction

## Housing Delivery Test requirements

- 1.1 In 2018 the government introduced a Housing Delivery Test (HDT). This is an annual measurement of how many homes a local planning authority has delivered against its local housing need (target) over the previous three years. The consequences of failing the test are set out in Paragraph 79 of the **National Planning Policy Framework**<sup>1</sup> (NPPF) (December 2024) as set out below. These consequences apply until subsequent HDT results demonstrate that delivery in has improved:

*“a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;*

*b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;*

*c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, in addition to the requirements for an action plan and 20% buffer.”*

- 1.2 The latest HDT was published on 12 December 2024<sup>2</sup> and shows that Horsham District Council has delivered 62% of its housing requirement between 2020-21 and 2022-23. The consequences outlined in the NPPF Paragraph 79.c therefore apply. This Action Plan has, therefore, been produced in response to the requirements of paragraph 79.

## Purpose of this Action Plan

- 1.3 This Action Plan has been prepared to consider factors which have affected the delivery rate and how the Council is responding to the challenge of building more homes at a faster rate. It sets out the challenges being faced and the actions the Council proposes to take to address these barriers and boost housing delivery. It covers the following

- Housing delivery context and causes
- Identification of barriers to housing delivery
- Key actions the Council is taking, or plans to take, to improve delivery

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<sup>1</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> [https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement#:~:text=The%20Housing%20Delivery%20Test%20\(HDT,looking%20back%20over%20the%20financial](https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement#:~:text=The%20Housing%20Delivery%20Test%20(HDT,looking%20back%20over%20the%20financial)

## 2 Housing Delivery - Context and Causes

- 2.1 Since the adoption of the **Horsham District Planning Framework (HDPF)** housing delivery rates in Horsham District were consistently higher than the identified target between 2015/16 and 2019/20 (Figure 1). The Council regularly exceeded Housing Delivery Test targets.

Figure 1 – Historic Net Housing Completions

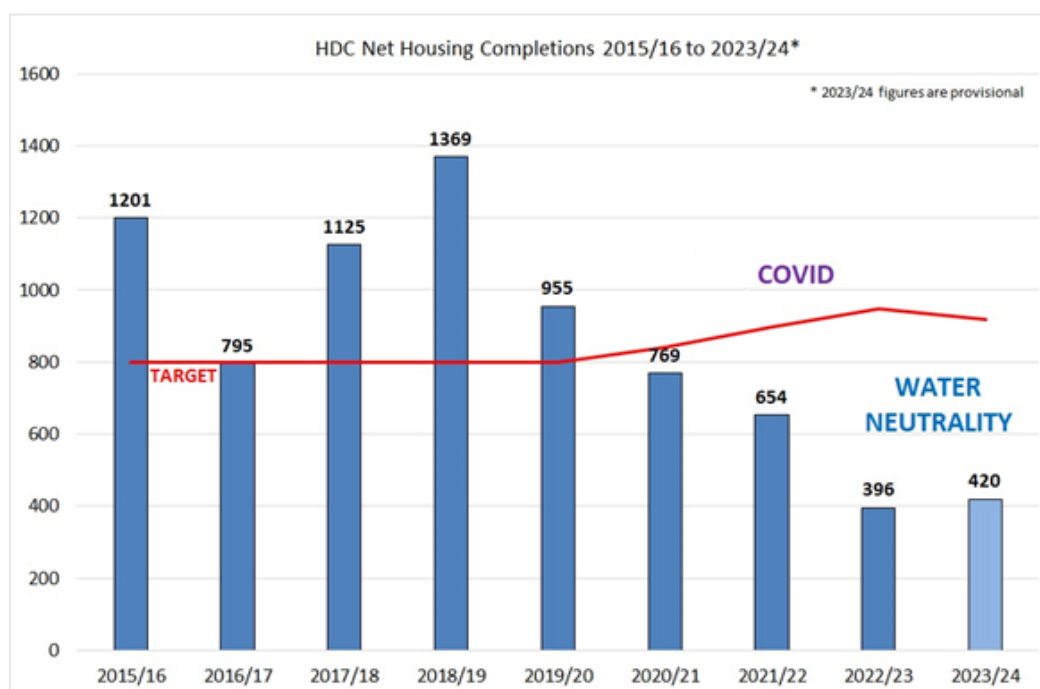
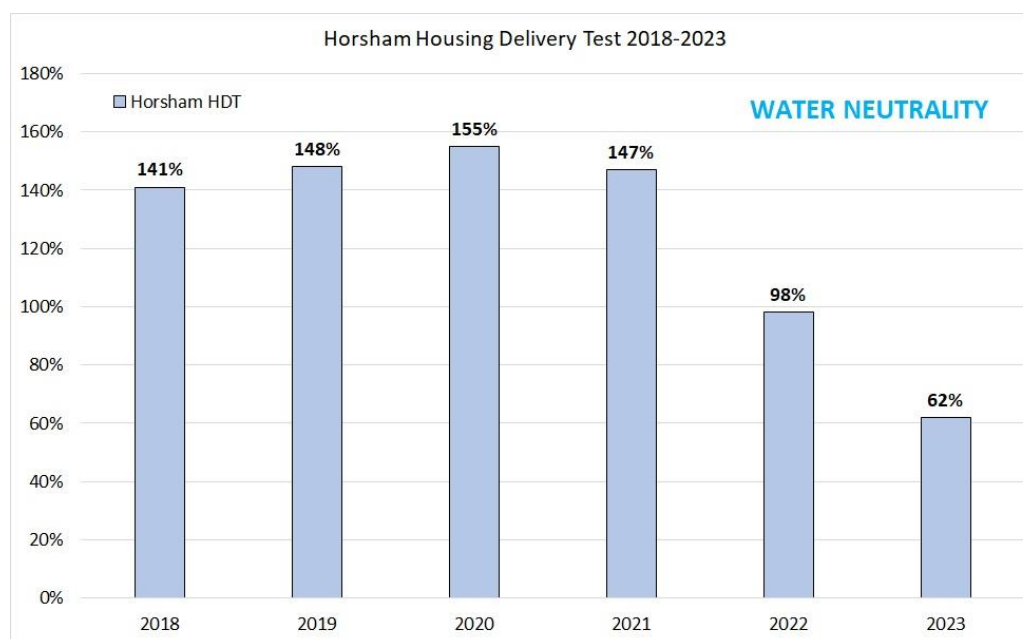


Figure 2 - Housing Delivery Test Results



2.2 Since 2020/21 there has been a decline in net housing completions. The primary reasons for this are set out below. None of the causes are within the Council's direct control.

- i) The Covid-19 global pandemic and associated lockdowns from March 2020 onwards resulted in productivity losses of around 35% on UK constructions sites delaying project delivery.
- ii) Slowdowns in the UK construction industry caused by macro-economic conditions lead to increased costs due to inflation, longer lead times, administrative burdens, and a shortage of skilled labour.
- iii) Thirdly and most crucially, on 14 September 2021, the Council (together with Local Planning Authorities in Crawley Borough Council, Chichester District Council, the South Downs National Park and West Sussex County Council) received a Position Statement from Natural England<sup>3</sup> without warning that identified the water abstraction for drinking water supplies was having a negative impact on the internationally protected wildlife sites in the Arun Valley. They advised that any new development that takes place must not add to this negative impact and must be "water neutral" by not increasing the rate of water abstraction for drinking water supplies above existing levels.

2.3 The requirement for water neutrality meant Horsham District Council has been unable to grant planning permissions for otherwise acceptable development in the absence of a water neutrality solution. Water Neutrality solutions have proven to be very challenging to achieve and has resulted in a precipitous drop in both the speed at which planning applications could be determined (Figure 3), due to the level of evidence required to demonstrate water neutrality, and also the number of dwellings permitted in total (Figure 4). The inability to grant planning permission has, therefore, translated into a consequential slowdown in the rate of completions that have taken place in the District.

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<sup>3</sup> <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district>

Figure 3 - Number of weeks to determine planning applications for dwellings (major and minor)

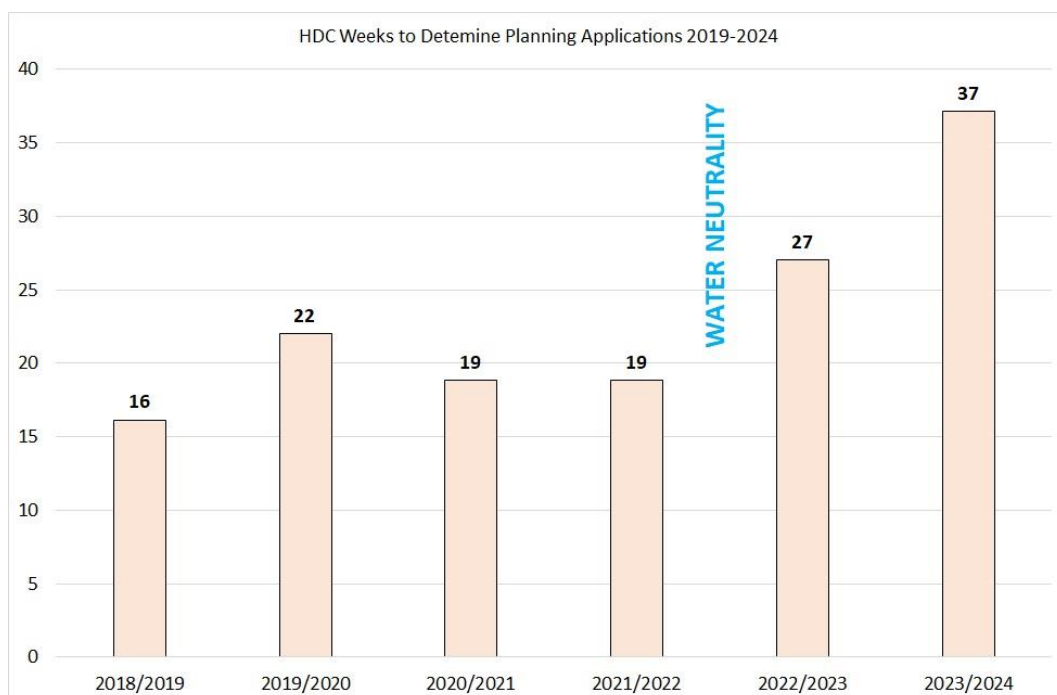
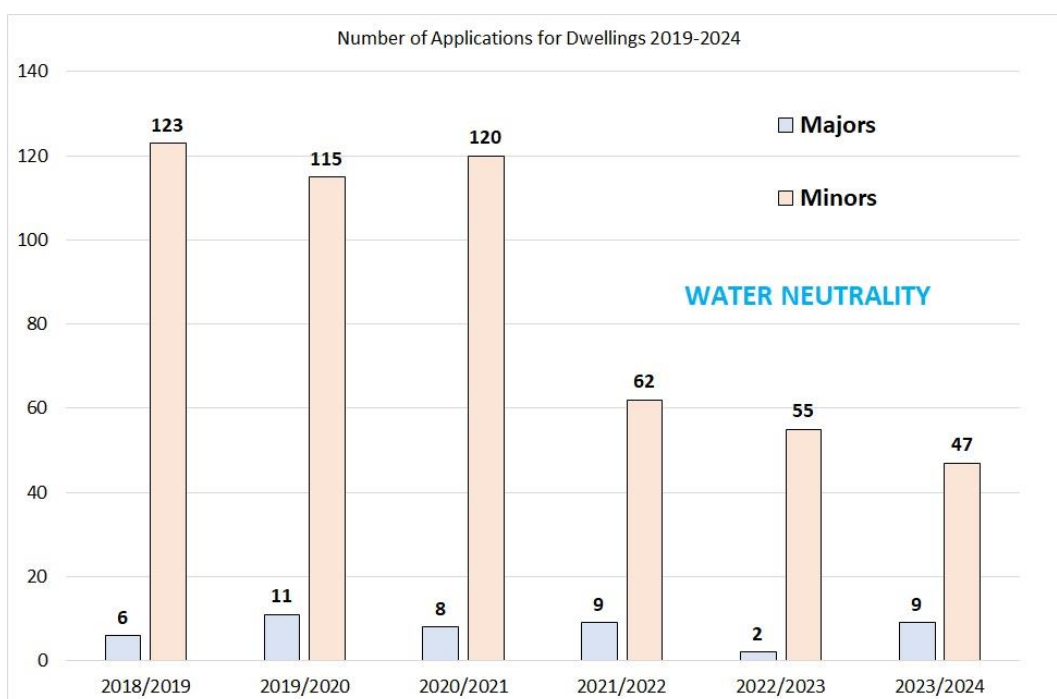


Figure 4 - Number of applications permitted



## 3 Housing Delivery Analysis

3.1 This section outlines the key sources of housing supply and future housing targets.

### Housing Targets

3.2 The Council publishes an **Authority Monitoring Report**<sup>4</sup> each year, which reviews the effectiveness of the authority's Local Development Scheme and planning policies. The most recent documentation covers the monitoring period 1 April 2023 to 31 March 2024. **Chapter 3: Housing** and its associated appendices set out a detailed breakdown of past housing completions, the five-year housing land supply, and expected future delivery. It confirms that:

- The current housing target for the District is derived from the Government's Standard Housing Methodology is 1357 homes per year
- The Council has a 1.0 year 5 year housing land supply.

### Sources of Housing Delivery

3.3 The bulk of past and expected future housing delivery comes from strategic sites (500+), together with some larger sites (of around 100+). Within the Council's current housing trajectory over the longer term key permissions and the outstanding numbers of homes to complete are as follows:

- i) Highwood, West of Horsham 1000 dwellings total, **344 remaining** in trajectory,
- ii) Kilnwood Vale, Colgate 2500 dwellings total, **1072 remaining** in trajectory,
- iii) Mowbray North of Horsham 2750 dwellings total, **1969 remaining** in trajectory,
- iv) Broadacres, West of Southwater 550 dwellings, **238 remaining** in trajectory,

3.4 Since April 2024, a number of sites have had as a minimum a resolution to permit development. These are not set out in the Council's five year supply these homes will count towards the longer term pipeline of homes. Key sites of around 75 or more homes include:

- i) Rascalls Farm, Shipley Road, Southwater – resolution to permit **96 homes**
- ii) Land at Duckmoor, Billingshurst - resolution to permit **83 homes**
- iii) Land at New Place Farm, Pulborough – Outline permission for **170 homes**
- iv) Ravenscroft Allotments, Storrington – Outline permission for **78 homes**

3.5 A comprehensive list of completed sites is set out in Appendix 1 of Chapter 3 of the AMR, as is further detail on the Council's wider housing delivery performance.

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<sup>4</sup> <https://www.horsham.gov.uk/planning/planning-policy/authority-monitoring-report>

## Submitted Local Plan

- 3.6 The Council has prepared and submitted a new Local Plan for examination. It identifies a number of site allocations that would contribute towards meeting identified local housing needs. The proposed allocations are listed below. These sites have the potential to be a key source of new housing and if brought forward would deliver in the region of 6,442 new homes over and above those outlined above. As discussed in section 4 of this document, the Council has now received a letter from the Local Plan Inspector in which he sets out his Initial Findings. At the time of writing this Action Plan, the Council is considering its options. Further detail is set out in the Council's response to the Initial Findings<sup>5</sup>.

### Strategic site policies:

- i) HA2: Land West of Ifield – **3,000 homes** (1,600 in the period to 2040)
- ii) HA3: Land North West of Southwater – **1,000 homes** (735 in the period to 2040)
- iii) HA4: Land East of Billingshurst – **650 homes**

### Smaller site policies:

- iv) HA5: Ashington – **75 homes**
- v) HA6: Barns Green – **95 homes**
- vi) HA7: Broadbridge Heath – **133 homes**
- vii) HA8: Cowfold – **70 homes**
- viii) HA9: Henfield – **55 homes**
- ix) HA10: Horsham – **400 homes**
- x) HA11: Lower Beeding – **43 homes**
- xi) HA12: Partridge Green – **255 homes**
- xii) HA13: Pulborough – **25 homes**
- xiii) HA14: Rudgwick and Bucks Green – **66 homes**
- xiv) HA15: Rusper – **22 homes**
- xv) HA16: Small Dole – **40 homes**
- xvi) HA17: Steyning – **265 homes**
- xvii) HA18: Storrington and Sullington – **125 homes**

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<sup>5</sup> [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0010/146566/HDC00-HDC-Initial-response-to-Inspectors-Initial-Findings.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0010/146566/HDC00-HDC-Initial-response-to-Inspectors-Initial-Findings.pdf)



xviii) HA19: Thakeham (The Street and High Bar Lane) – **65 homes**

xix) HA20: Warnham – **20 homes**

xx) HA21: West Chiltington and West Chiltington Common – **38 homes**

## 4 Barriers to Delivery

4.1 This section provides an assessment of the key barriers to housing delivery.

### Local Plan

- 4.2 The NPPF makes clear that the planning system should be plan-led, with local plans identifying where new development will take place and how local housing need will be met. The plan provides communities and applicants with certainty about what development is expected to come forward within the plan period, and the policy criteria necessary for development to be assessed positively.
- 4.3 The Council has been mindful of the need to ensure that it has an up-to-date local plan in place, commencing its local plan review process in 2018, and holding a further Regulation 18 consultation in early 2020. However, there have been significant barriers outside of the Council's direct control that have delayed progress on plan preparation.
- 4.4 On 15 July 2021 Cabinet endorsed a draft Regulation 19 version of the Local Plan. However, the plan did not proceed to full Council as intended due to the subsequent publication of a revised National Planning Policy Framework on 20 July 2021 and the receipt of the **Natural England Position Statement**<sup>6</sup> relating to water neutrality on 14 September 2021. The Position Statement had a very significant impact on the Local Plan as it required the Council to demonstrate its delivery could be water neutral. Following the receipt of the Position Statement, the Council worked closely with other affected authorities and partner bodies to understand the impacts of water neutrality and to develop solutions to enable Local Plans to come forward in light of the constraint. Details relating to this are set out in the **Statement of Common Ground**<sup>7</sup> produced by the affected authorities, the **Water Neutrality Joint Topic Paper**<sup>8</sup> and **Water Neutrality Joint Topic Paper 2024 Update**<sup>9</sup>.
- 4.5 The Council formally submitted the Local Plan and supporting documents to the Planning Inspectorate on Friday 26 July 2024, with hearings held between 10 and 12 December 2024. However, on 16 December 2024 the Inspector wrote to the Council cancelling all further hearings and indicating that '*I have significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas. I will set these out in detail in a separate letter as soon as I possibly can*'. On 4 April 2025, the Inspector wrote to the Council recommending that the Council withdraw the Local Plan due to his finding that the Duty to Co-operate had not been met. At the time of publication of this document, the Council was considering its options in relation to the Inspector's letter.
- 4.6 Without an up to date local plan in place, the location and timing of any planning applications become a lot more uncertain, and it will be more difficult to know when or where development will come forward. This may have implications for the delivery of key infrastructure which could risk the rate at which development can progress.

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<sup>6</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0019/106552/Natural-Englands-Position-Statement-for-Applications-within-the-Sussex-North-Water-Supply-Zone-September-2021.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0019/106552/Natural-Englands-Position-Statement-for-Applications-within-the-Sussex-North-Water-Supply-Zone-September-2021.pdf)

<sup>7</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0014/130820/Water-Neutrality-Statement-of-Common-Ground.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0014/130820/Water-Neutrality-Statement-of-Common-Ground.pdf)

<sup>8</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0014/131603/CC14-Joint-Water-Neutrality-Topic-Paper-May-2023.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0014/131603/CC14-Joint-Water-Neutrality-Topic-Paper-May-2023.pdf)

<sup>9</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0008/138977/CC15-Joint-Water-Neutrality-Topic-Paper-Policy-Update.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0008/138977/CC15-Joint-Water-Neutrality-Topic-Paper-Policy-Update.pdf)

## Water neutrality

- 4.7 Paragraph 2.2iii) sets out the events which led to the requirement for most development proposals and all development plans to demonstrate water neutrality. In order to address this problem, Horsham District, together with the other affected Local Planning Authorities has worked to develop a strategic scale solution 'Sussex North Offsetting Water Scheme' or SNOWS. This scheme will be required until such time as the Natural England Position Statement is revoked or amended so that water neutrality is not required. This scheme uses the demand management savings from Southern Water's Water Resources Management Plan (WRMP) as a baseline, alongside additional local authority-led water offsetting as required. Any development proposals that are in line with the agreed access criteria for SNOWS (compliant with an adopted development plan or neighbourhood plan, or a post-submission local plan), will be able to use SNOWS to offset their water use, subject to the capacity available in the scheme. The water offsetting requirements of the application will be allocated against the Southern Water baseline (and/or separate SNOWS offsetting as required) and a certificate issued to the applicant as confirmation that their development can be constructed in a water neutral way.
- 4.8 As stated above, the requirement for Water Neutrality has been a key barrier to the development of the Council's Local Plan. In the absence of a strategic solution to Water Neutrality, the requirement for water neutrality in Horsham District is the constraint on all development including the delivery of dwellings. There also remains uncertainty as to the precise level and timescales for the delivery of water demand reduction measures which can be delivered by Southern Water due to delays to the publication of their WRMP 24, originally due to be published in April 2023, Further changes and consultation were required, and the draft WRMP 24 is yet to be agreed by central government. Final agreement is now not expected until the summer of 2025 at the earliest. Further detail on the latest position of interested parties has been set out in the Council's **Water Neutrality Update Note – Response to Action Point 9**<sup>10</sup>.
- 4.9 For as long as the Natural England Position Statement remains in place, most new development must continue to demonstrate that it is water neutral. Whilst the Inspector's Interim Findings letter focussed on the potential for alternative solutions to water neutrality to deliver additional housing, the letter did not take account of the fact that many proposed development sites are dependent on access to SNOWS, which has been devised to deliver plan led growth as a priority. Whilst work to consider the implications of the Inspector's letter in this respect is ongoing, it is necessary at this stage to highlight a risk that without a local plan in place, proposals for development in Horsham District will be less able to gain priority access to SNOWS, again slowing down the delivery of development in Horsham District.

## Legacy impact of water neutrality on housing delivery

- 4.10 In addition to the challenges water neutrality has presented in delivering a local plan, the requirement also applies to most planning applications in advance of a strategic solution. The impact of this is set out in section one of this action plan. In the absence of a strategic solution to water neutrality there have been significant delays to the number and speed at which applications could be determined, and many sites simply cannot progress at all. This has included reserve matters applications, including strategic sites which are in adopted development plans.

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<sup>10</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0006/144483/HDC42-Water-Neutrality-Update-Note-Response-to-Action-Point-9\\_Redacted.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0006/144483/HDC42-Water-Neutrality-Update-Note-Response-to-Action-Point-9_Redacted.pdf)

- 4.11 The effect of water neutrality on the delivery of housing will continue to be felt for a time even when a solution to water neutrality becomes available, or if water neutrality ceases to be a requirement for new development and Natural England's Position Statement is withdrawn. Section 6 of Horsham District Council's **Topic Paper 1: The Spatial Strategy**<sup>11</sup>, submitted to the Horsham District Local Plan examination in September 2024, sets out in detail the impact water neutrality requirements have had on the number of applications submitted and the subsequent supply of homes. It also explains that while there has been significant progress in establishing an offsetting scheme for water usage, the scheme would not have an immediate impact on the rate that planning applications are approved, and low completion numbers would still be expected in the short to medium term.
- 4.12 It takes a major development (10+ dwellings) on average 3.8 years from full permission to completion of the first dwelling, therefore the shortfall in completions will persist due to the shortfall in permissions granted since September 2021.

### Market absorption

- 4.13 The Council has produced evidence on the capacity of the housing market to accommodate growth<sup>12, 13</sup>. The most recent update to this evidence was the **Horsham Housing Delivery Study Update December 2023**. This study considered what impact the ability of the housing market to accommodate growth would have on deliverability of the strategies being considered as part of the local plan review. This study took account of the context of water neutrality but also taking account of wider constraints or opportunities for growth across the District which could impact the ability of the district to sustain very high levels of growth over the plan period.
- 4.14 The study identified the macroeconomic factors which have led to peaks in the housing market cycle before Covid / 2021, and to a growth in national housebuilding trends, including good availability of mortgage finance, low interest rates, attractiveness of housing as an investment, an increase in population through international migration, and a period of sustained economic growth. It noted that the recovery from the 2008 financial crisis was dampened by macroeconomic instability following the UK's decision to withdraw from the EU, and in the south-east affordability pressures were identified as a constraint to the market and to house price growth. The study also determined that any concentration of site allocations in certain areas of the district (e.g. multiple strategic sites in a concentrated geographic location) would impact build out rates due to local infrastructure and market capacity constraints.
- 4.15 Ultimately, it is recognised that there will be a legacy impact of water neutrality on delivery rates in the immediate short to medium term. However, over the longer plan period as a whole, market capacity may also have some limitations to the overall level of growth that can be accommodated. This is something that the Council will continue to monitor.

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<sup>11</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0004/139477/HDC02-Topic-Paper-1-The-Spatial-Strategy-.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0004/139477/HDC02-Topic-Paper-1-The-Spatial-Strategy-.pdf)

<sup>12</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0005/104594/Housing-Delivery-Study-FINAL.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0005/104594/Housing-Delivery-Study-FINAL.pdf)

<sup>13</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0013/131602/Horsham-Housing-Delivery-Study-UPDATE-Dec-2023.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0013/131602/Horsham-Housing-Delivery-Study-UPDATE-Dec-2023.pdf)

## 5 Key Actions

- 5.1 The Council intends to address the barriers to delivery, and to facilitate future housing delivery more widely, via the mechanisms discussed below.

### Delivery of a Local Plan

- 5.2 The **Council Plan 2023-2027**<sup>14</sup> has four main themes: *Supporting People and Communities; Inspiring Greener Futures; Building a Thriving Local Economy; Always listening, learning and improving.*
- 5.3 Of relevance to this action plan, the theme “Inspiring greener futures” aims to deliver a Local Plan. As is discussed in section 4 above, the Council has (after a considerable delay) now received a letter from the Inspector which recommended that the Local Plan be withdrawn from examination. Irrespective of the next steps, this delay is regrettable as this is time that Council officers could have spent either addressing the Inspectors concerns, or if required commencing the preparation of a new plan.
- 5.4 An updated Local Development Scheme (LDS), which provides a timetable for the production of the Local Plan, was agreed by Cabinet on 26 February 2025 – prior to the receipt of the Inspector’s letter. The LDS reflected the lack of certainty in the timescales to progress the submitted Local Plan at the time. It also highlights the potential for the Council to be required to produce a new local plan under updated regulations which are likely to come into force later in 2025.
- 5.5 The Devolution White Paper<sup>15</sup>, which was published in December 2024, proposes the creation of unitary authorities to replace all current lower and upper tier authorities. It has now been confirmed that West Sussex, East Sussex, and Brighton and Hove will be considered in the first phase of these reforms, with new unitary authorities being in place by 2028. Whilst it is the intention of the District to continue with plan preparation, it is not clear at this stage whether a new local plan could be adopted before the abolition of Horsham District Council and its replacement with a new unitary authority, or whether a new authority would proceed with the adoption of a local plan which was commenced under the District Council.

### Delivery of SNOWS

- 5.6 As set out in Section 1 of this document, the key mechanism to help deliver growth will be the implementation of SNOWS. The full launch of SNOWS will provide the means to enable plan led growth with more certainty. The Council will work with the other affected planning authorities and key partner organisations including Natural England, the Environment Agency and Southern Water and relevant government departments to enable water offsetting capacity to be made available and unlock development. The planning officer working groups across the affected authorities will continue to meet regularly to ensure consistency of approach and to resolve any issues that arise.
- 5.7 An initial 'beta' launch of SNOWS took place on Monday 3 March 2025. This involves testing of the internal processes and systems on several live planning applications and allowed appeals. It is then

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<sup>14</sup> <https://www.horsham.gov.uk/council-democracy-and-elections/finance-and-council-performance/council-plan-2023-2027>

<sup>15</sup> <https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper>

the intention to launch the scheme once the terms of Southern Water's baseline have been agreed between SNOWS, Southern Water, and regulators. A **SNOWS Applicant User Guide**<sup>16</sup> has now been published on the SNOWS web page, setting out which developments can access the scheme, how schemes will be prioritised for access and how to apply for access. The Council will assess all planning applications related to sites allocated in the Local Plan and prioritise access to SNOWS accordingly. This will ensure that allocated sites, once permitted, will be free to begin building as soon as possible.

## Grampian Conditions

- 5.8 Grampian conditions are a type of planning condition. They prevent a development from starting until a certain action has been undertaken / put in place. In relation to Water Neutrality, the use of a Grampian Condition removes the need for eligible development to demonstrate water neutrality at the point at which a planning application is determined. Instead, for eligible development, the Council will give permission to build subject to a Grampian condition that development must not be occupied until a water offsetting scheme is established and accessed for the development. Alternatively, the development may be able to implement a bespoke water neutrality solution. Such an approach will need to remain in place until such time as the water neutrality constraint is resolved and the Natural England Position Statement is withdrawn or amended.
- 5.9 While the use of Grampian conditions does not directly solve the issue of water neutrality, nor does it necessarily speed up delivery, it does allow development which will be eligible for the SNOWS scheme to progress through the planning application process to approval. This ensures there can be a supply of sites ready for development to commence subject only to discharging the relevant water neutrality condition.
- 5.10 In addition to Grampian Conditions it should also be noted the Council provides detailed advice and FAQs on its website on how to approach water neutrality considerations, including guidance for private offsetting proposals.

## Facilitating Appropriate Development update

- 5.11 The Council has produced a **Facilitating Appropriate Development**<sup>17</sup> (FAD) document which was endorsed at full council on 22 October 2022. The FAD recognises the absence of a 5-year housing land supply and seeks to direct and approve development outside of built-up area boundaries where it adheres to policy criteria, and has been well received by the development industry and planning inspectors. An update to the FAD is expected to take place in 2025 to take into account the new national policy context and the next steps which are taken in respect of the Council's local plan.
- 5.12 The FAD is intended to provide guidance and clarity for applicants on the weight that can be given to current and emerging planning policy within a national planning policy context, which is clear in setting out the Government's objective to significantly boost the supply of homes. Any update will continue to reflect the Council's intention to act proactively and positively to deliver homes sustainably and in the required numbers.

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<sup>16</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0017/144620/SNOWS-Applicant-User-Guide-Mar-2025.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0017/144620/SNOWS-Applicant-User-Guide-Mar-2025.pdf)

<sup>17</sup> <https://www.horsham.gov.uk/planning/planning-policy/facilitating-appropriate-development>

## Affordable Housing Delivery

- 5.13 Horsham District Council's Housing team has been working closely with Housing Associations (Registered Providers, or RPs) to ensure maximum affordable housing delivery and have engaged with a number of RPs that are developing, or looking to develop, in the District. Larger RPs have limited the scale at which they will bring forward affordable homes to 50 affordable rented units before 2020. This leaves only a small cohort of providers who are willing to work with smaller sites. The Council has offered additional funding through S106 reserves to provide additional units on sites (above policy compliance levels) to increase affordable housing delivery. The Council will continue with this approach on a site-by-site basis moving forward, targeting our local need which is currently to provide dwellings for households on the housing register.
- 5.14 Horsham District Homes (HDH), the Council's wholly owned affordable housing provider, will assess Council owned land for development potential and in addition, given the constraints on development caused by water neutrality, the Council will also look at the open market for opportunities to deliver affordable housing. This will enable the Council to deliver homes for specific needs identified through the Housing Register as well as boosting housing supply. HDH has already delivered 8 units in two separate sites (5 Affordable Rent and 2 Shared Ownership) these were delivered in 2022.

## Developer Engagement

- 5.15 The performance of the Development Management service has not been identified as a barrier to the delivery of housing (see table 1). The Council has a strong track record of positive engagement with developers to ensure planning applications, particularly those for major schemes, can progress successfully subject to meeting planning policy requirements and this approach will be continued.

**Table 1: Percentage of applications determined within the agreed timeframe**

Year	Total Applications	Majors in time (% incl. extensions of time (EOT))	Minors in time (% incl. EOTs)
2019/20	1,412	100%	97%
2020/21	1,335	100%	97%
2021/22	1,455	95%	95%
2022/23	1,239	82%	94%
2023/24	1,109	100%	95%



- 5.16 There are a number of methods used by the Major Applications team to expedite the delivery of housing and where focus can be maintained in the future to ensure any improvements to the barriers identified in this document are maximised and delivery is boosted where possible.
- 5.17 Developers and other interested parties are kept informed of progress on the strategic water neutrality solution via regular SNOWS newsletters.

#### Pre-Application Advice Service

- 5.18 The Council has an established Pre-Application Advice (PPA) service, which is available to all applicants who would like information on key planning issues which apply specifically to their site or proposal. The service ranges from “Do I need planning permission?” for smaller household applications, through to written advice, site visits and meetings for sites of 200+ homes, as well as specific advice on S106 agreements. The PPA service was updated and improved in January 2025, separating out some categories to make it more affordable and attractive to small and medium developers (SMEs) who wish to deliver a small number of homes.
- 5.19 The advice can also indicate to applicants whether their scheme is likely to be granted planning permission and, where problems with the proposal are identified, solutions can be proposed before the submission of a formal planning application.

#### Planning Performance Agreements

- 5.20 The Council offers a bespoke Pre-Application Advice service through a Planning Performance Agreement (PPA). This project-managed service works to agreed timescales, structured deadlines and action points. The service can be tailored to the requirements of the applicant, and can include multiple site visits and meetings, input from specialist officers including Environmental Health, Conservation and Landscape, and the involvement of a senior member of the Development Management department as well as presentation of the scheme to Committee Councillors.
- 5.21 PPAs have been used successfully on a number of major plan-led development sites and will continue to be used where appropriate to facilitate the timely and efficient delivery of high-quality schemes.

#### Local Agents Forum

- 5.22 In addition to the above, the Council engages with developers on a wider basis through a Local Agents Forum. This forum meets on a 6-monthly basis and provides local agents the opportunity to engage with officers about a range of local planning issues. This allows any issues which may act as a barrier to delivery to be identified at an early stage, and resolved. A recent review highlighted the potential of the forum to be better utilised to allow agents and officers to work together to improve the speed and quality of applications and decision making, by streamlining the validation and applications process.

#### Neighbourhood Plans

- 5.23 Within Horsham District, there are 29 parishes and one Neighbourhood Forum (‘Horsham Blueprint’) who have the ability to prepare Neighbourhood Plans. Of these areas 24 are either Made or in the process of preparation. Approximately 1,800 dwellings allocated for development within neighbourhood plans in the period up to 2031. The Council has a dedicated neighbourhood plan officer who provides bespoke advice and guidance to the parishes and neighbourhood councils to



help prepare and implement their neighbourhood plans. The Council remains committed to assisting parishes and the Neighbourhood Forum in ensuring their plans can be prepared to meet the needs of their local area, and therefore provide a contribution to meeting local needs.

## 6 Next Steps and Monitoring

- 6.1 Several sources of information are used to identify and assess any opportunities for residential development. These are listed below and will continue to be reviewed and updated as appropriate to ensure that the Council has a full understanding of the sites that may be available for development in the District and remain informed of any barriers to delivery that need to be addressed. These include:
- i) *Strategic Housing Land Availability Assessment*: an appraisal of potential sites and broad locations with the potential for development which includes an assessment of their development potential and their suitability, availability and achievability,
  - ii) *Brownfield Register*: a list of previously developed (brownfield) sites with the potential for residential development,
  - iii) *Self-Build and Custom Housebuilding Register*: a list of individuals or groups who have expressed an interest in acquiring a serviced plot of land to either building a home themselves, or have a home custom built,
  - iv) *West Sussex County Council Housing completion data*: the number of residential units built out and ready for habitation in a set time period (usually annually)
- 6.2 Housing delivery is monitored jointly by West Sussex County Council and Horsham District Council and is reported through the Authority Monitoring Report (AMR), which is published each year. The AMR provides updates regarding the housing land supply position. In addition, the Council maintains and updates the Brownfield Register with the most recent brownfield register being published in December 2024.
- 6.3 Subject to the outcomes of future Housing Delivery Test figures, this Action Plan will be reviewed and any update published in line with the requirements of the National Planning Policy Framework. Any relevant changes in legislation, government policy or practice guidance will also be reflected in any update.

## Conclusion

- 6.4 This is the first action plan to be produced by the Council following the publication of the most recent Housing Delivery Test results. Historically, Horsham District has performed well in delivering homes against identified housing targets. The primary reasons for the slow down in housing delivery have been matters outside the District Council's control, the most important of which is the requirement for development in the District to demonstrate that it is water neutral in order to demonstrate compliance with the Council's legal obligations under S63 of the Conservation of Habitats and Species Regulations 2017.
- 6.5 This Action Plan demonstrates the proactive approach being taken by the Council and its partners to increase the level of housing delivery in the Sussex North Water Resource Zone through the development of the strategic solution to water neutrality - a water offsetting scheme, SNOWS. This plan also highlights other ways the Council is seeking to boost housing delivery.

- 6.6 It should be noted that the ongoing requirements for increasing housing delivery may take time to have effect (as permissions take time to be realised). Although jointly agreed initiatives such as SNOWS will unlock a significant amount of development, the Council has no way of completely overcoming the main constraint, which is water neutrality, in the short term. This may mean that housing delivery test figures will take a period of time before they improve significantly.