



Examination of Horsham Local Plan Update 2023-2040

Written Statement – Matter 2

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1 Introduction

1.1 Introduction

- 1.1.1 Stantec is instructed by Miller Homes Limited (“Miller Homes”) to submit this Written Statement in response to Matter 2 (Housing Supply and Headroom) arising from the Inspector’s Matters and Questions.
- 1.1.2 Miller Homes has a land interest at Lyons Road, Horsham (SHELAA Reference SA492). These representations are made in the context of that interest; however, in accordance with the Inspector’s Guidance Note, they do not seek to promote any specific site for allocation. Instead, they focus on the soundness of the Plan in relation to housing supply, delivery and resilience.
- 1.1.3 This statement should be read alongside the representations submitted by Miller Homes in respect of Matters 1 and 3, which address the housing requirement and the approach to meeting housing needs.
- 1.1.4 This Written Statement addresses the questions raised by the Inspector in relation to:
- a) The housing supply trajectory as proposed
 - b) The reliability of housing delivery assumptions
 - c) The reliability of assumptions about windfalls
 - d) The robustness of the trajectory
 - e) Maintaining adequate housing land supply, including a rolling five-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 and timing
- 1.1.5 In responding to these matters, the focus of this statement is on whether the Plan provides a realistic, robust and deliverable housing supply, supported by sufficient flexibility and contingency.

1.2 Summary of Position

- 1.2.1 It is respectfully submitted that the Plan is unsound in respect of its housing supply and headroom. In particular:
- The trajectory relies on optimistic and insufficiently evidenced assumptions
 - The supply is heavily dependent on a limited number of sites
 - The identified headroom may not provide a sufficiently robust or reliable buffer
 - The Plan lacks flexibility and effective contingency mechanisms



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2.1.1 The following sections respond to the Inspector's questions in turn, having regard to the requirements of the National Planning Policy Framework.

2.2 a) The Housing Supply Trajectory as Proposed

2.2.1 The housing trajectory is based on a combination of commitments, strategic allocations, smaller site allocations and windfall allowances. While this is a typical approach, the trajectory assumes consistent and timely delivery across the plan period. In practice, delivery is rarely linear. Strategic sites are subject to long lead-in times, infrastructure dependencies, and phasing constraints.

2.2.2 The trajectory does not adequately reflect these realities and therefore risks overstating both the rate and timing of delivery. The Council's trajectory indicates that delivery is dependent on a small number of strategic sites and assumes consistent build-out rates over time. This does not reflect typical delivery patterns and introduces a significant degree of uncertainty.

2.2.3 As such, the approach is not justified and not effective, as it is not based on robust evidence of deliverability.

2.3 b) The Reliability of Housing Delivery Assumptions / Allowance for Non-Delivery

2.3.1 There are significant concerns regarding the reliability of delivery assumptions. Build-out rates appear optimistic and are not fully evidenced. There is limited allowance for delays or non-delivery. External constraints, including environmental and infrastructure factors, are likely to affect delivery.

2.3.2 The Plan does not adequately account for the risk that sites may be delayed, deliver fewer units than anticipated and not come forward at all. A sound approach would include a realistic allowance for non-delivery, which is currently lacking. In addition, there is no clear evidence of a systematic lapse rate or adjustment to account for non-implementation. Without such an allowance, the trajectory is likely to overestimate delivery.

2.3.3 The Council's evidence does not clearly demonstrate how these risks have been accounted for within the trajectory, nor does it provide a robust allowance for non-delivery.

2.3.4 As such, the approach is not justified and is not effective, as it overestimates delivery and does not provide a realistic basis for supply.

2.4 c) The Reliability of Assumptions About Windfalls

2.4.1 The Plan includes a windfall allowance over the plan period. While windfalls can contribute to supply, they are inherently uncertain. There is limited evidence to demonstrate that past delivery rates justify the scale of windfalls assumed, or that future delivery will remain consistent over time.



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- 2.4.2 Windfalls are influenced by market conditions and land availability, both of which can fluctuate. As such, reliance on windfalls introduces additional uncertainty into the trajectory and should be treated with caution.
- 2.4.3 The trajectory shows a reliance on windfall delivery across the plan period, without clear evidence that this level of delivery will be sustained.
- 2.4.4 As such, the approach is not justified and not effective, as it relies on uncertain sources of supply.

2.5 d) The Robustness of the Trajectory

- 2.5.1 Drawing the above points together, the trajectory is not sufficiently robust. It is based on optimistic delivery assumptions, a high level of reliance on strategic sites and uncertain contributions from windfalls. It is therefore considered that there is insufficient evidence to demonstrate that the trajectory can be delivered as anticipated and this therefore undermines confidence in the overall supply position.
- 2.5.2 This lack of robustness is reflected in the Council's own evidence, which identifies challenges in maintaining delivery over the plan period.
- 2.5.3 As such, the approach is not effective and is not justified.

2.6 e) Maintaining Adequate Housing Land Supply (Including a Rolling Five-Year Supply)

- 2.6.1 Maintaining a rolling five-year supply of housing land is a key requirement of national policy. Given the uncertainties identified, including delays to strategic sites, variability in build-out rates and reliance on windfall sites, there is a significant risk that the Plan will fail to maintain a five-year supply over the plan period. The absence of sufficient flexibility and contingency further exacerbates this risk.
- 2.6.2 Failure to maintain a five-year supply would have significant policy implications, including the application of the presumption in favour of sustainable development, further highlighting the importance of a robust and deliverable supply position.
- 2.6.3 The Council's trajectory indicates that delivery is constrained in certain periods, increasing the risk that a five-year supply will not be maintained.
- 2.6.4 As such, the approach is not effective and is not consistent with national policy.

2.7 f) Headroom, Resilience and the Mitigation of Risk

- 2.7.1 While the Plan identifies a level of headroom, there are concerns regarding the extent to which this provides a robust and reliable buffer. Given the range of delivery risks identified, including reliance on strategic sites, assumptions regarding build-out rates, and the contribution from windfalls, the identified headroom may not provide sufficient flexibility to absorb delays or under-delivery.



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- 2.7.2 A sound plan should include a level of headroom that is both realistic and resilient, and capable of responding to changing circumstances over the plan period.
- 2.7.3 In addition, the Plan does not include clear mechanisms to mitigate risk. There are no reserve sites, phased contingency allocations, or clear triggers for intervention. This represents a significant weakness in the Plan's approach.
- 2.7.4 The limited and uncertain nature of headroom, when considered alongside the identified delivery risks, does not provide a sufficient buffer to ensure delivery.
- 2.7.5 As such, the approach is not effective and not justified.

2.8 g) Whether the Housing Requirement Should be Stepped

- 2.8.1 Given the delivery constraints identified, a stepped housing requirement is not considered an appropriate or effective solution.
- 2.8.2 While a stepped approach may seek to reflect delivery constraints in the early years, it risks deferring delivery to later in the plan period. This would increase reliance on optimistic assumptions regarding the delivery of strategic sites and could result in back-loading of housing provision.
- 2.8.3 The Council's own trajectory indicates challenges in maintaining delivery across the plan period. A stepped approach would not address these underlying issues and may instead exacerbate them.
- 2.8.4 A sound approach should seek to ensure consistent and realistic delivery throughout the plan period, supported by a sufficient range and choice of deliverable sites.
- 2.8.5 As such, a stepped requirement would not result in a positively prepared or effective plan.

2.9 h) Whether Additional Housing Allocations are Required and if so, of what kind / size / timing

- 2.9.1 Considering the issues identified, additional housing allocations are required. There is a need to broaden the supply base, reduce reliance on large strategic sites and improve early delivery.
- 2.9.2 This should include smaller and medium-sized sites, sites capable of delivering in the short to medium term, and sites that are less reliant on significant infrastructure. Such sites are typically more flexible and can contribute more quickly to housing supply.
- 2.9.3 The Plan should also allow for greater flexibility in how sites contribute to housing supply. Sites that may have previously been considered for alternative forms of residential development may be capable of contributing to general housing provision.
- 2.9.4 A more flexible approach to site allocation and delivery would:
- Improve resilience
 - Support early and sustained delivery
 - Reduce reliance on high-risk strategic sites



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- 2.9.5 This is particularly important in the context of the delivery constraints identified and would provide a more robust, flexible and adaptable supply strategy over the plan period.
- 2.9.6 The Council's evidence demonstrates a reliance on a limited number of sites and identifies risks to delivery across the plan period.
- 2.9.7 As such, the Plan is not positively prepared and not effective, as it does not provide a sufficient range and choice of deliverable sites to ensure housing needs are met.



3 Conclusion and Recommended Modifications

3.1 Conclusion

3.1.1 The housing supply and headroom position is not sufficiently robust or flexible to ensure delivery across the plan period. The trajectory relies on optimistic assumptions, the level of headroom is insufficient, and there is a lack of effective contingency. The Plan is therefore not positively prepared, not justified, not effective, and not consistent with national policy.

3.2 Recommended Modifications

3.2.1 To ensure soundness, the Council should:

- Reassess the housing trajectory to reflect realistic delivery assumptions
- Increase headroom to provide a meaningful buffer
- Introduce contingency mechanisms to address potential under-delivery; and
- Broaden the range of housing allocations to include more deliverable and flexible sites

3.2.2 This should include sites capable of contributing to general housing provision, particularly where they are available, deliverable, and able to respond to changing circumstances over the plan period.

