



Hearing Statement – Matter 3: Homes to meet the needs of all the community

**Horsham District Council Local Plan 2023-2040:
Examination in Public – April 2026**

Prepared on behalf of Thakeham Homes Limited

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Revision: 3

1.0 Matter 3 – Homes to meet the needs of all the community

a) The identified level of affordable housing need

- 1.1 Tetlow King submitted a detailed report on affordable housing on behalf of Thakeham Homes on the previous Reg. 19 submission (see Land at Buck Barn (Wealdcross) - response to HDC Reg. 19 (final)). This demonstrated a considerable undersupply of affordable housing since 2019 that has resulted in increasing demand with only 17% of households on the Housing Register being satisfied during 2011/12 – 2022/23. The emerging Local Plan at that time was therefore only seeking to meeting around 51% of the need for affordable housing (around 5,000 homes at the time).
- 1.2 Thakeham notes that the Council has assessed the total annual affordable housing need figure (554 dpa- as stated at paragraph 18 of HDCJB07). At paragraph 18 of HDCJB07 the Council note that the annual need figure represents 61% of the local housing need figure of 911 dpa. It is clear, that on the Council’s own assessment of need, the strategic policies of the plan fail to provide for the objectively assessed need for affordable housing.

b) Whether the proportion of affordable housing sought from each site is appropriate

- 1.3 The affordable housing requirements set out in Strategic Policy 39(1) have been informed by the Local Plan Viability Assessment (paragraph 9.2 of H12) (as stated at paragraph 10.38 of the draft reasoned justification (SD01)).
- 1.4 At paragraph 26 of HDCJB07 the Council say that the Horsham Viability Study is being updated. Given that the document on which the Council rely in order to justify the affordable housing requirements in policy 39(1) is under review, it is not possible to make any meaningful comments on the percentages set out in policy 39(1). As a result Thakeham would wish to consider the updated viability study before making any final submissions under this heading.
- 1.5 On the basis of Thakeham’s current understanding of housebuilding viability it does not consider that greenfield sites can possibly deliver 45% of homes as affordable.
- 1.6 We also do not consider that Build to Rent accommodation should be a minimum of 40% affordable for the reasons stated above that there is no evidence this is viable or why it should differ from other types of housing.
- 1.7 Given the worsening financial position of housebuilding and the lack of up to date evidence from the Council, it is our preliminary view that the affordable housing



figure for greenfield and Build to Rent should be no higher than 35%. The Inspector recently confirmed that 30% was an acceptable figure in Mid Sussex, so in the absence of up to date and convincing evidence it is not clear how the Council can justify a 15% uplift on this.

- 1.8 Given the likely large increase in numbers that the Plan is likely to have to cater for, an higher overall housing requirement combined with lower affordable housing percentage is likely to be the most effective means by which affordable housing need can be met.
- 1.9 In relation to Wealdcross, it is a strategic site and therefore would be expected to deliver 35% of the homes as affordable, and that is acceptable. However, we do not believe there should then be separate figures for either care villages or Build to Rent (BTR) and it is not clear from the policy if that applies where the strategic site is also delivering these types of housing. For example, if a strategic site is expected to deliver at 35% but contains a BTR scheme, is that scheme meant to be 35% or 40%? The policy is not clear in its drafting and should be reviewed.

c) Whether the mix of homes is appropriate

- 1.10 No comment.

d) The plan's approach towards self-build and custom housing

- 1.11 We accept there is a need for some self-build and custom housing, but we think that it is important that this is considered in a reasonable manner. The Council's own evidence is that the register is declining and there is an existing supply for many already on the register, leaving only a small shortfall of less than 100 units. Policy 38 is worded suitably but must be applied in a reasonable manner. Neighbourhood Plans are likely to be the best place to meet a local need for this type of housing.

e) The plan's approach towards homes for older people

- 1.12 Strategic Policy 39 seeks 30% affordable housing for care sites but defers the detail to Policy 42. This then refers back to Policy 39 and sets out a requirement for C2 to meet the affordable requirement but C2 affordable housing is not easy to provide within a care community where service charges for clinical facilities can be high and difficult for those in affordable units to pay. This results in a management problem where either some residents do not have access to all of the facilities or somehow



- other residents have to subsidise the affordable units. Neither solution will lead to a suitable solution.
- 1.13 There should be an exception for care facilities to have a negotiated solution, as has been done in existing cases. On site provision is very difficult to achieve. Therefore, Strategic Policy 39 (d) should be amended by removing the last part of the sentence “...a minimum 30% of the total (gross*) as applies in accordance with Policy 42”; and replacing it as set out below:
- d) On sites providing continuing care retirement housing, retirement housing and other specialist care housing, **the affordable housing provision should be negotiated on a site-by-site basis where it is practical to deliver affordable housing on site, where it can be managed effectively and to meet the aims of inclusive communities.**
- f) Accessibility policy**
- 1.14 Policy 40 sets out a requirement that is too rigid. The delivery of M4(2) and M4(3) units is accepted as something that can be achieved but the policy is proposing a blanket approach that does not understand the finances or spatial requirements. We agree with the points made by the HBF relating to viability and that the evidence based appears to quote the wrong figure for the costs of supplying M4(2) and M4(3) houses.
- 1.15 The requirement for all houses to be M4(2) and 5% to be M4(3) does not consider that these houses are physically larger to accommodate the requirements and therefore densities will be lower, requiring more green fields to be built upon, and further reducing the viability.
- 1.16 The newly proposed NPPF suggests that only 40% of new homes should comply with these requirements and not 100% and we consider that the policy should reflect emerging National Policy that has been tested for viability.
- g) Provision for gypsies, travellers and travelling showpeople**
- 1.17 No comment.





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