



Homes
England

Horsham District Local Plan 2023-2040 Examination in Public

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

Hearing Statement

Date: April 2026



1. Introduction

- 1.1. This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield which is identified as a strategic site HA2 in the draft Horsham Local Plan.
- 1.2. This statement supplements Homes England's previous representations to the Horsham District Local Plan Regulation 19 consultation, Hearing Statement's and verbal evidence submitted to the Examination in 2024. This Statement deals with **Matter 3: Homes to meet the needs of all the community** of the Inspector's Hearings Agenda published 16 March 2026, covering the following topics:
 - a. The identified level of affordable housing need
 - b. Whether the proportion of affordable housing sought from each site is appropriate
 - c. Whether the mix of homes is appropriate
 - d. The plan's approach towards self-build and custom housing
 - e. The plan's approach towards homes for older people
 - f. Accessibility policy.

A. The identified level of affordable housing need

- 1.3. Within the Council's Topic Paper relating to this Hearing Matter, it has identified that there is an overall net affordable housing need of 554 dwellings per annum (dpa). Homes England does not contest the identified need, although notes the age of the supporting evidence base i.e. Strategic Housing Market Assessment (SHMA) (2019) and Horsham Social Rented Housing and First Homes Study (SRFHS) (2022).
- 1.4. It is also noted that in respect of the bespoke AH target set for the West of Ifield allocation, there is a reliance on the adopted Crawley Local Plan and CBC Reg19 representations to justify a higher level of provision. The CBC Local Plan or relevant supporting documents are not included as part of the HDC Local Plan evidence base and within the context of the points made elsewhere in this representation, Homes England would question the robustness of any justification for identifying a site-specific AH target on third party representations. If available, it would be more appropriate to evidence need through the due plan making process – for example evidence of ongoing engagement with adjoining authorities as set out in the Statement of Common Ground. Notwithstanding the points below, this would strengthen any justification for taking a site-specific approach.
- 1.5. Policy 39 identifies a District wide target of 35% affordable housing on strategic sites with the exception of Land West of Ifield where a minimum of 40% target is applied.

Homes England is supportive of the delivery of affordable housing as set out in our Strategic Plan and is committed to supporting the LPA in achieving its objectives. Notwithstanding this, there remains a need for the AH requirements to be fully justified and there are outstanding matters as to whether the viability and deliverability of achieving a higher provision at West of Ifield has been tested and whether it is fully justified. This is addressed in response to matter 3.B below.

B. Whether the proportion of affordable housing sought from each site is appropriate

- 1.6. Throughout the Local Plan process, Homes England has consistently queried the justification and soundness of applying a site-specific AH policy for West of Ifield, over and above that for other strategic sites and whether this has been appropriately tested.
- 1.7. At Paragraph 32 of the Council's Topic Paper there is a reference to an updated Viability Study (document reference HDC15) to justify the approach. The Council contests that this evidence demonstrates that the HA2 allocation could support the increased 40% affordable housing requirement. However, while this tests the higher affordable provision, it does not address the wider concerns as to how a general typology approach has been applied to HA2 viability test and how inputs to that study (including those provided by Homes England through the viability testing process) have been taken into account and can be considered up to date, in as much as:
 - **Accuracy of Cost Information** – HDC15 is a viability addendum note prepared by Aspinall Verdi and is dated November 2024 so could be considered out of date. Given the length of time since HDC15 was prepared, there have been significant economic and other material changes – such as build cost increases, water neutrality costs no longer being required, delay in HDC undertaking CIL review, future Building Safety Levy, changes to sales values – all of which are likely to have an impact on the viability of schemes and relative returns compared to BLV.
 - **Scheme specific cost information** – at a site-specific level, a hybrid planning application has been submitted on the West of Ifield site (LPA Ref. DC/25/1312) on the basis of the adopted plan target of 35%. Through this process costs associated with the development have developed greater certainty with the gap between the real scheme costs and the assumptions of the Aspinall Verdi work becoming clearer. The submission of the hybrid application now provides greater clarity as to infrastructure and s106 costs, phasing, housing mix and other on-site requirements such as provision of

primary and secondary schools, a medical centre, on-site sports facilities, and Phase 1 of the Crawley Western Multi-Modal Corridor (CWMMC). These should be reflected in an updated assessment to ensure the Local Plan evidence assumptions are robust and reflect the reality of the scheme.

- 1.8. Separately, given the delay to the review of the CIL charging schedule, as matters currently stand, CIL would also be chargeable for the development at West of Ifield on top of the S.106 obligations and on-site infrastructure requirements to deliver the scheme. The Council's viability evidence recognises the risk of double counting with HDC15 stating at paragraph 8.6 "*.....it is not possible to assess whether there is double counting between S106 and CIL. Should any of these sites progress, the Council will need to be clear about what infrastructure they expect to fund through the levy and planning obligations*"; yet there has been no indication for how this will be managed. This is a live issue being dealt with through the current hybrid application and has the potential to significantly increase the overall infrastructure and s106 cost compared to those assumed in the Aspinall Verdi assessment.
- 1.9. The points outlined above continue to raise questions around the suitability of a more generic, typology approach to evidence and justify the setting of higher AH levels for HA2. Homes England previously submitted a letter to the Council following the publication of HDC15 (dated 22 November 2024) as an appendix to Hearing Matter Statement 8 of the 2024 hearing sessions. This letter is appended for ease of reference to this Statement. The points within still stand, namely that the supporting Aspinall Verdi Viability Study and Addendum Note, do not appropriately reflect the infrastructure costs or other site-specific requirements or circumstances required to implement the West of Ifield Development and the impact of setting site specific AH target for West of Ifield is not appropriately justified.
- 1.10. Within this context, consideration should be given to a commitment to fast tracking the CIL review and as to whether any further updates are required to the Local Plan viability assessment in order for the site specific AH policy to be fully justified. In the absence of any updated evidence, greater flexibility should be applied to HA2 requirements so that the 40% for West of Ifield is not a minimum but rather a stretch target that can be implemented on a stepped basis subject to further testing through the development management process. Homes England would still support a minimum AH requirement where this is based on up to date evidence.

c. Whether the mix of homes is appropriate

- 1.11. Homes England is satisfied that the HDC evidence base and supporting policy requirements for housing mix set out in Strategic Policy 38 are sound.
- 1.12. The West of Ifield planning application has been prepared with an indicative mix that is based on a blended mix from HDC and CBC that was agreed with officers during pre-application discussions. This means that the West of Ifield proposed mix does differ slightly from the mix identified at Policy 38. It is, therefore, recommended that additional text is included to Policy HA2 as a main modification to acknowledge the above, we suggest:

“a suitable mix of housing sizes and types will be provided across the site taking account incorporating a blend of the latest up to date evidence of both Horsham District Council and Crawley Borough Council”

- 1.13. The Policy should also acknowledge how these needs may evolve during the lifetime of the construction process for strategic allocations such as West of Ifield that will deliver across the plan period, where final housing mix will best be determined through Reserved Matters based on the most up to date evidence at that time. Accordingly, policies should avoid being overly restrictive and rigid with regards to the application of prescriptive housing mix across all phases of the strategic allocations.

d. The plan’s approach towards self-build and custom housing

- 1.14. The Plan appropriately adopts a flexible approach to self-build and custom housing, requiring Strategic Sites to consider the demand for self-build and custom housing to provide enough serviced plots of land to meet identified needs. Homes England would be opposed to an alternative approach that sought a blanket percentage policy.

e. The plan’s approach towards homes for older people

- 1.15. In terms of the overall quantum, the Plan does not seek to prescribe the delivery of older-persons housing, instead embedding a requirement within the relevant strategic allocation policies and leaving detailed consideration until the DM stage. While this ensures that there is flexibility in how this housing typology is delivered taking into account specific local and temporal needs, it does not provide certainty either for the delivery of older persons or allow for potential consequences for the delivery or good planning i.e. achieving higher affordable housing; enabling infrastructure delivery; locating older person accommodation in most appropriate locations.
- 1.16. For example, the SRFHS indicates an overall need of 610 additional housing units with sheltered/retirement facilities and 563 extra-care housing units in Horsham District

over the 2021-2038 period. The Council's supporting statement on this matter references a reduced identified need from WSCC for C2 Care Home provision with Horsham District identified as having a small shortfall of about 35 bed-based care places by 2035.

- 1.17. Under the current non-prescriptive approach within the Plan, the West of Ifield (HA2) allocation could be required to over-deliver this type of accommodation. During discussions with officers during the live planning application, HDC has requested 10% older person provision across each phase of the development. This would deliver at least 300 older person units – around 25% of the total need identified or higher if the 10% was applied consistently per phase. This would likely result in an oversupply of older person accommodation within a single strategic allocation, impacting upon the aim of the Plans Spatial Objective 10 and HA2's allocation's wider policy requirements / objectives.
- 1.18. On this basis, consideration should be given as to how, as a whole, the Plan can provide a greater level of clarity in how it intends to deliver the identified needs for elderly accommodation across the entire plan, identifying what is expected from strategic allocations to meet the need identified.

f. Accessibility policy

- 1.19. Policy 40 requires all new dwellings to meet Building Regulations M4(2) and for a minimum 5% of all affordable dwellings to meet M4(3) standards on sites that provide 20 or more units provided there is evidence of need on the housing register. Homes England contests that 5% M4(3) minimum requirement is unsound as it is not justified through appropriate supporting evidence. Similar to concerns in relation to older persons accommodation, a blanket approach to the provision of M4(3) units means that there may be a disproportionate level of provision within one area / site rather than meeting the needs of the district as a whole which may not best meet housing needs and could also impact upon the allocations wider policy requirements / objectives.
- 1.20. Again, using West of Ifield as an example, requiring a blanket 5% on a single strategic site delivered early in the Plan period would deliver c.150 M4(3) homes. It is not clear how such a level of provision would address the shortfall identified in Para 58 – 61 of the HDC Topic Paper, however this level of provision is likely to contribute significantly towards it, meaning there would be less opportunity to secure M4(3) across other sites within the district. It would be preferable for Policy 40 and any specific requirements in HA2 (or other strategic allocation policies) to consider how, as a

whole, the Plan can provide a greater level of clarity in how it intends to deliver the identified needs and for needs to be considered at each Reserved Matters stage.

g. Provision for gypsies, travellers and travelling showpeople

- 1.21. Policy 31 seeks to deliver the identified Gypsy and Traveller and Travelling Showpeople (G&T/TS) needs through a series of site allocations including provision spread across a small number of strategic sites (Billinghurst, West of Ifield and Southwater). Given additional strategic sites are likely to be allocated through main-modifications in order to meet the overall housing requirements of the plan¹, the distribution of these pitches should be revisited to more evenly distribute the requirements across the District, to better meet needs where they arise, ensure requirements can be delivered and effective management arrangements can be put in place.
- 1.22. Policy HA2 currently requires West of Ifield to provide 15 pitches, 22% of the overall proposed additional provision. As set out in previous representations, there is no clear justification as to why such a requirement for the West of Ifield has been identified or why there is such a significant difference in requirements across the three strategic allocations currently required to plan for G&T provision. Through engagement with the G&T community as part of the application process and from experience from delivering on other site, such a requirement may be challenging to deliver when taking account of cohesiveness, family arrangements and design requirements².
- 1.23. Given the above, consideration should be given as part of any identification of additional strategic allocations as to how G&T/TS requirements are best distributed across the District and whether there are opportunities to balance the planned distribution across strategic allocations. In addition to the spatial distribution of G&T provision, further consideration should be given as to building flexibility within strategic allocations so as to not sterilise significant developable areas in the event that expected uptake of planned G&T provision does not materialise or alternative windfall sites become available that would better meet the needs of the community through offsite provision. More flexible wording should be included as part of the Strategic Allocation policies to allow for alternative offsite provision in lieu or secure a fallback position should it be demonstrated that there is not demand for the expected provision within a specific allocation.

¹ As confirmed by Horsham District Council's letter to Mr Bore dated 4 February 2026

² Communities and Local Government - Designing Gypsy and Traveller Sites
Good Practice Guide

Appendix A - Homes England letter to Horsham District Council dated 22 November 2024

Horsham District Council
Planning Policy
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

BY EMAIL

22 November 2024

Dear Catherine

HORSHAM DISTRICT COUNCIL DRAFT LOCAL PLAN – VIABILITY APPRAISAL ADDENDUM (NOVEMBER 2024)

I write in respect of the above document.

Homes England (HE) have reviewed the updated viability outputs for Land West of Ifield undertaken as part of the strategic site testing for Horsham Local Plan, as set out in the letter prepared by Aspinall Verdi (19th November 2024) (the Addendum). While we agree the allocation is viable, we still have some concern the assumptions of the Viability Appraisal do not adequately address our previous concerns and therefore the requirement for 40% affordable housing at West of Ifield is not fully justified.

Aspinall Verdi state that previous assumptions have not been revisited. Those assumptions are therefore now over a year old and will therefore not take account of any changes in inflation, interest rates, house prices or site-specific infrastructure matters or mitigation which HE will naturally be informed on.

In HE's representations to the Regulation 19 Local Plan consultation, we made a number of comments in relation to the Aspinall Verdi Viability Study (2023) and its direct relationship with draft Policy HA2: West of Ifield. These comments included the following:

- i. There needs to be sufficient justification for applying a site-specific Affordable Housing policy to West of Ifield. Clarification needs to be provided as to how this should be considered when taking account of unmet needs from Crawley – which the Local Plan states cannot be accommodated by Horsham District Council (HDC). This will ensure the Plan is justified in line with Paragraph 16 of the NPPF.
- ii. As recognised in HDC suggested modification HA063, a blended housing mix has now been agreed for West of Ifield as part of the pre-application process. This reflects the site's location 'At Crawley'. Neither the Viability Study or the Addendum included this mix as an assumption.
- iii. The Viability Study (November 2023) has only tested the viability of West of Ifield with the inclusion of one primary school, which is not aligned to the requirements in Policy HA2 and suggested modification HA065 for primary education, which references two. Whilst Homes England, West Sussex County Council and HDC have undertaken pre-application discussions which indicate that, based on the above referenced blended mix, only one primary school is presently anticipated at West of Ifield, the assumptions in the

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Viability Study, Policy wording and Infrastructure Delivery Plan need to align. Indeed, the Site Assessments Report (December 2023) only refers to the provision of one primary school within the site allocation.

- iv. The Infrastructure Delivery Plan and Policy HA2 require provision of primary health care (or financial contributions) at West of Ifield. Homes England have had positive dialogue with NHS Sussex in this regard and this use will form part of a future planning application. However, neither the Viability Study or Addendum takes this into consideration. This matter has been raised in other third party representations in response to the Regulation 19 Local Plan consultation.
- v. Policy wording in HA2, and to a lesser specific extent, paragraph 99/103 of the NPPF require offsite mitigation for the loss of facilities at Ifield Golf Club **“in the absence of site-specific evidence demonstrating the surrounding area has capacity to accommodate its loss”**. Homes England has been engaging with HDC, England Golf and Sport England as part of the pre-application process and having published evidence in respect of this matter on our website [Keep in Touch with Latest News - West Of Ifield - Commonplace](#) in September 2024, is progressing options for offsite mitigation, if it is required. Neither the Viability Study or the Addendum takes this into consideration. This matter has also been raised in other third party representations in response to the Regulation 19 Local Plan consultation.
- vi. Homes England have confirmed that we have 100% control of the land required to deliver development at West of Ifield. Of this, 97% of the land is owned by Homes England with the remainder in our control through executed land agreements. As has been raised in other responses to the Regulation 19 consultation, there will be further acquisition costs to be expended as part of the delivery of the scheme. Homes England have taken account of these costs within our build cost assumptions. However, this is not recognised in the Viability Study (2023) or the Addendum (2024).

We wish to highlight, again, that the infrastructure cost information for West of Ifield - as submitted by Homes England to inform the Local Plan viability work (November 2023) - is at a considerable variance to those assumed by Aspinall Verdi in their *Local Plan Viability Study 2023*. It is clear from the Addendum that the cost assumptions that underpin the outputs remain unchanged from their Viability Study (2023).

As matters currently stand we note the Council's expectation is that CIL is also to be paid in addition to appropriate s106 contributions. We appreciate that a review of the CIL Charging Schedule is due to take place to determine whether CIL should be levied on Strategic Sites however, this review has not concluded yet.

Homes England are keen to work with HDC to ensure no 'double counting' occurs as acknowledged in the Viability Study (2023) as a risk to be managed. You will of course be aware that PPG requires CIL to be assessed on a 'policy-on' basis to avoid precisely this concern. This is particularly relevant to West of Ifield, where a number of planning obligations will relate to cross boundary issues. Securing this via a Section 106 Agreement will allow planning obligations to be much more tailored and specific to the impacts of the development. Homes England will be making further representations to the consultation on the review of the CIL Charging Schedule in due course.

HE wish to reiterate that, in principle, it very much wishes to support HDC in achieving a sound Local Plan that includes West of Ifield as an allocated strategic site. However, for the reasons outlined above, HE have concerns that some of the inputs relied upon by the Council are erroneous.

We are committed to delivering a sustainable development at West of Ifield which embodies high quality placemaking and, first and foremost, mitigates the impact of the development. HDC will recall that Homes England have previously committed to 35% affordable housing in previous iterations of the draft Local Plan. In addition, we have acknowledged the potential opportunity to uplift affordable housing through Affordable Housing Programmes (post planning), as we have done at Brookleigh (Burgess Hill) and many other sites nationwide. It is in the interests of all parties to ensure that the evidence base for the draft Local Plan is robust and so we would welcome the

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opportunity to engage further with Aspinall Verdi, to ensure that the proposed planning application for West of Ifield (which is in an advanced stage of preparation) remains deliverable and viable.

Yours sincerely,

A handwritten signature in blue ink that reads "K. McBride".

Kate McBride

Regional Development Director

Homes England