Horsham Housing Delivery Study Update

Final Report

Iceni Projects Limited on behalf of

Horsham District Council

June 2026

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CONTENTS

1. INTRODUCTION

1.1 Horsham District Council has commissioned Iceni to prepare a Housing Delivery Study Update building on the 2020 Housing Delivery Study, and a previous update of the Study in 2023. The core purpose of the updated report is to test deliverability in market capacity terms of potential housing trajectories to be taken forward through main modifications to the Horsham Local Plan.

1.2 As part of this exercise, the report brings the analysis around housing market dynamics and performance up-to-date, reviews and draws this together with wider elements of the Council's evidence base and takes account of more recent information around timescales for the main strategic sites proposed or promoted for allocation in the emerging Local Plan.

1.3 This report takes into account submissions from strategic site promoters regarding lead-in times and build out rates and draws on evidence from previous submissions and other evidence base documents.

Horsham Local Plan Examination and Water Neutrality

1.4 The Horsham District Local Plan 2023-2040 was submitted for examination in July 2024. The examination of the Plan was delayed in the context of concerns around water neutrality and related matters.

1.5 Initial hearings were held in December 2024 with an Interim Findings Letter published in April 2025. These initial findings were set against the context of water neutrality issues in the District, which resulted in significant uncertainties and potential constraints to the delivery of housing in Horsham District. The Inspector's April 2025 Interim Findings Letter raised significant concerns regarding the effectiveness of engagement between the Northern West Sussex Housing Market Area (HMA) authorities in this context.

1.6 Water neutrality has represented a significant constraint on housing development as well as on local plan preparation in the Horsham District over the last few years. Natural England issued a Position Statement in September 2021 regarding the Sussex North Water Supply Zone (SNWSZ) in which Horsham District sits. Given potential adverse effects on the Arun Valley Special Area of Conservation, Special Protection Area and Ramsar Site, Natural England advised that any new development must not increase overall water use in the region. The 2023 Housing Delivery Study Update was prepared in this context. Water neutrality issues have inhibited the Council's ability to grant planning consent on a range of residential development schemes which might place increasing pressure on water abstraction.

1.7 Since this point, Southern Water has worked with partners – including the Environment Agency and Natural England – to find a long-term solution. This has been taken forwards through Southern Water's Hardham Basin Environmental Study. It has culminated in an agreement by Natural England to a package of ecological resilience measures and proposed licence amendments that will address the further decline of sites in the Arun Valley as a result of water extraction, resulting in a revised position where it is agreed that development in the SNWSZ will not have a significant likely ecological effect.

1.8 Natural England formally withdrew its Position Statement on 31st October 2025 following an agreement with Southern Water and the Environment Agency. This means that developments need no longer demonstrate water neutrality, and related constraints on development and plan making no longer apply. It also means that it is no longer necessary to proceed with the Sussex North Offsetting Water Scheme (SNOWS), which the Council and other partners in the SNWSZ area had been developing to manage water savings in order to enable new development to proceed.

1.9 Given this material change in circumstances, the Examination of the Local Plan is now proceeding. A new inspector has been appointed and the Examination of the Horsham District Local Plan has resumed. Further hearings took place on matters of housing requirement and supply from the 21st to 24th April 2026, and the inspector's Post-Hearing Letter (Document IDHB05) was released on 7th May 2026.

1.10 The inspector notes that additional sites will need to be included in the Local Plan through main modifications. The core purpose of this updated report is to consider the deliverability of sites which may be included, their potential contribution to supply over the plan period and of the resulting housing trajectory.

Horsham Local Housing Need & the Housing Requirement

1.11 The Horsham Local Plan was prepared using the Government's standard method for calculating local housing need, which at the time of preparation and submission of the Plan was based on average annual household growth over 10 years (using the 2014-based Household Projections); and then applying an upward adjustment based on the latest median workplace-based affordability ratio. Further steps of applying a cap to the uplift, and applying a further 35% uplift in some urban local authorities, were not applicable to Horsham District.

1.12 Since submission of the Plan in July 2024, the Government has revised the Standard Method (in December 2024). This revised Standard Method is now based on applying a growth rate to the level of existing housing stock and then applying an affordability uplift to the result. In many cases (including in Horsham District), this revision has materially increased the level of housing need indicated by the Standard Method.

1.13 The Government has also revised the National Planning Policy Framework (NPPF), publishing a revised version in December 2024. This makes the use of standard method essentially mandatory in determining local housing need, apart from limited cases where local planning authority boundaries do not align with local authority district boundaries (as is the case in Horsham District where part of the District falls within the South Downs National Park).

1.14 However, the Horsham District Local Plan 2023–2040 is being examined under the September 2023 NPPF and the standard method calculation in effect at that point.[1] This is accepted in the Inspector's Post-Hearing Letter (Document IDHB05), which notes a local housing need figure for the part of Horsham District outside of the South Downs National Park of 890 dpa for 2023/24, 896 dpa for 2024/25 and 819 dpa from 2025/26 onwards. This amounts to a need for 14,071 homes over the plan period (2023-40). The details of this calculation are set out in the Council's Housing Requirement Topic Paper (March 2026).[2]

1.15 The Inspector has also concluded in Document IDJB05 that Horsham's Local Plan should address half of the unmet housing need from Crawley (3,757 dwellings over the plan period), the other half of which is to be met by Mid Sussex.

1.16 The Inspector also states that Horsham's Local Plan will need to accommodate a realistic and reasonable evidence-based allowance for the South Coast's unmet housing need from the South Coast (i.e. from local authorities in Sussex to the south of the District), with the amount to be met to be determined based on further evidence.

1.17 We understand that based on further analysis, the Council is proposing 52 homes per annum to meet unmet needs from the Coastal authorities (32 dpa for Worthing and 20 dpa for Adur). Over the plan period this equates to 884 dwellings.

1.18 The proposed overall housing requirement on this basis is for 18,712 dwellings, as summarised below.

[1] This is provided for in the transitional arrangements set out in NPPF Annex 1.

[2] https://www.horsham.gov.uk/__data/assets/pdf_file/0011/162875/HDCJB04-Matter-1-Housing-Requirement-Topic-Paper.pdf

Table 1.1 Proposed Housing Requirement – Horsham Plan Area

	Dwellings
Horsham's housing need	14,071
Contribution to Crawley's unmet need	3,757
Contribution to Coastal Sussex's unmet need	884
Total housing requirement	18,712

Structure of the Update Report

1.19 This report provides an updated assessment of housing delivery issues and tests the potential housing trajectory.

1.20 The remainder of the report is structured as follows:

- Section 2: Housing Market Dynamics
- Section 3: Delivery of Strategic Site Options
- Section 4: Reviewing the Council's Housing Trajectory
- Section 5: Conclusions.

2. HOUSING MARKET DYNAMICS

2.1 This section provides an updated analysis of housing market conditions and dynamics in the District – as well as a brief update on national housing delivery. This includes consideration of the current market with our analysis considering trends in housing supply, as well house prices, sales and rental values. The analysis includes qualitative evidence drawn from Iceni's engagement with local estate and letting agents in different areas of Horsham District to understand local market dynamics at the current point in time. It needs to be borne in mind that the housing market is cyclical and current market conditions are unlikely to persist over the plan period.

2.2 A component of our analysis considers housing delivery in terms of rates of housing stock growth (i.e. what growth in the housing stock is seen per year) as a means of appraising housing delivery between areas of different sizes and the feasibility of achieving different scales of housing growth.

The National Housebuilding Trend

2.3 In this sub-section, we have sought to provide an update on recent national trends in housing delivery.

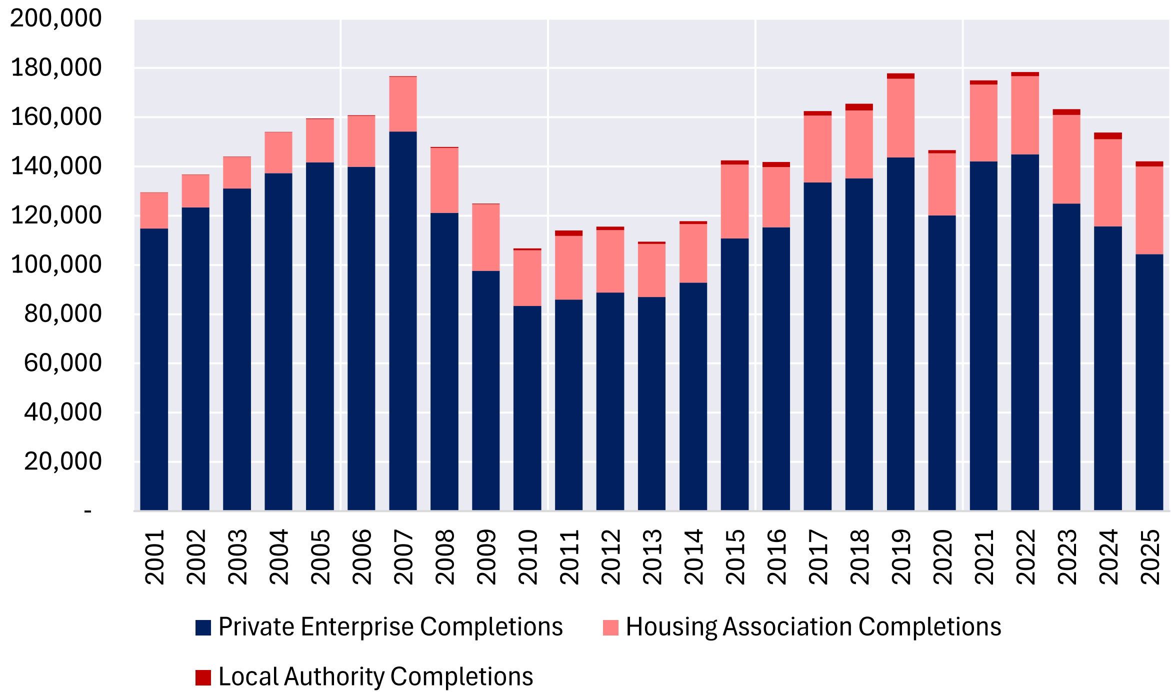
National Housebuilding Trends

2.4 As set out in Figure 2.1 below, the level of housebuilding across England increased year-on-year from 2001 to a peak of 176,640 homes in 2007. This growth in housebuilding was supported by:

- A period of sustained economic growth;
- Strong availability of mortgage finance;
- Historically low interest rates; and
- Attractiveness of housing as an investment.

2.5 These factors, together with an upturn in population growth rates (influenced in part by growing international migration), saw strong housing demand and an upturn in housing supply. Effective demand for housing over this period increased strongly. Whilst housing supply increased, it was unable to keep pace with the rapid growth in demand and as a result we saw strong growth in house prices in real terms and relative to incomes.

Figure 2.1: New-Build Housing Trends Across England, 2001-2025



Source: MHCLG Live Table 244

2.6 With the financial crisis, driven by issues associated with sub-prime mortgage lending, the market turned dramatically in 2008. Housebuilding levels fell dramatically, as the availability of mortgage finance became more restricted. The situation did not start to ease until 2013 when fluidity within financial markets started to improve and we saw Government intervention through the Help-to-Buy and Funding for Lending schemes, both of which were significant in supporting a recovery in effective demand for housing for sale.

2.7 The Covid-19 pandemic resulted in a temporary pausing of market activity in Spring 2020 when the Government imposed a national lockdown. The market recovered and performed strongly following this and into 2022 as enforced lockdowns led households to re-evaluate their living circumstances. Alongside this, the Government's introduced a Stamp Duty Holiday from July 2020 to June 2021 during which time no SDLT[3] was due on the first £500,000 of property value.

2.8 The period from Spring 2009 to Winter 2021 was characterised, in a historical context, by historically low interest rates combined with the Government support for the new-build housing market (through the Help-to-Buy Scheme). The Bank of England 'base' interest rate over this period remained at or below 0.75%. However through 2022 and 2023 the base rate has risen rapidly as the Bank has sought to manage inflationary pressures in the economy, including rising energy costs as a result of the War in Ukraine. It peaked at 5.25% in August 2023 and had been on a downward trajectory,

[3] Stamp Duty Land Tax

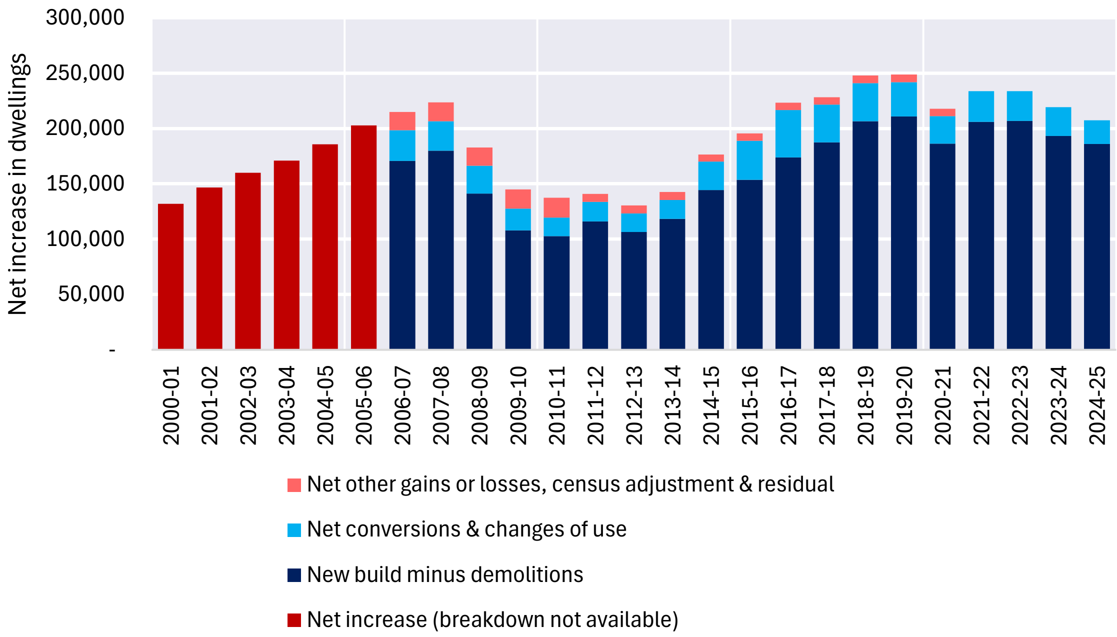
which appears to have somewhat faltered in Spring 2026 with the Iran War and associated oil supply chain disruptions in the Middle East. Effective housing demand for sale is sensitive to interest rate changes as this directly affects the cost of mortgage finance, and rising interest rates have had a cooling effect on the sales market.

2.9 Since 2022 the number of new homes completed across England has fallen every year. In 2025 142,040 homes were completed, around 20% down on the 2022 peak. This level of completions is comparable to levels seen in 2015-16. The decline in housing completions has been driven almost exclusively by a drop in private enterprise completions, as Figure 2.1 shows. In contrast, housing associations have remained relatively stable at between 24,000 – 36,000 homes per year over the last 11 years.

Net Additional Dwellings

2.10 The latest available MHCLG data shows a total net delivery of a of 185,970 homes nationwide in 2024/2025. It should be noted that housing completions in **Figure 2.2** are higher than those shown in **Figure 2.1** due to the inclusion of other categories of housing supply including conversions, changes of use and other gains. The trends in net housing delivery shown in **Figure 2.2** below are similar to those seen in the new-build data considered above. However, net additions data shows that new build homes are the major contributor to national housing supply.

Figure 2.2: Trends in Net Additional Dwellings in England, 2001 to 2025



Source: ONS, Table 118, November 2025

National housing starts

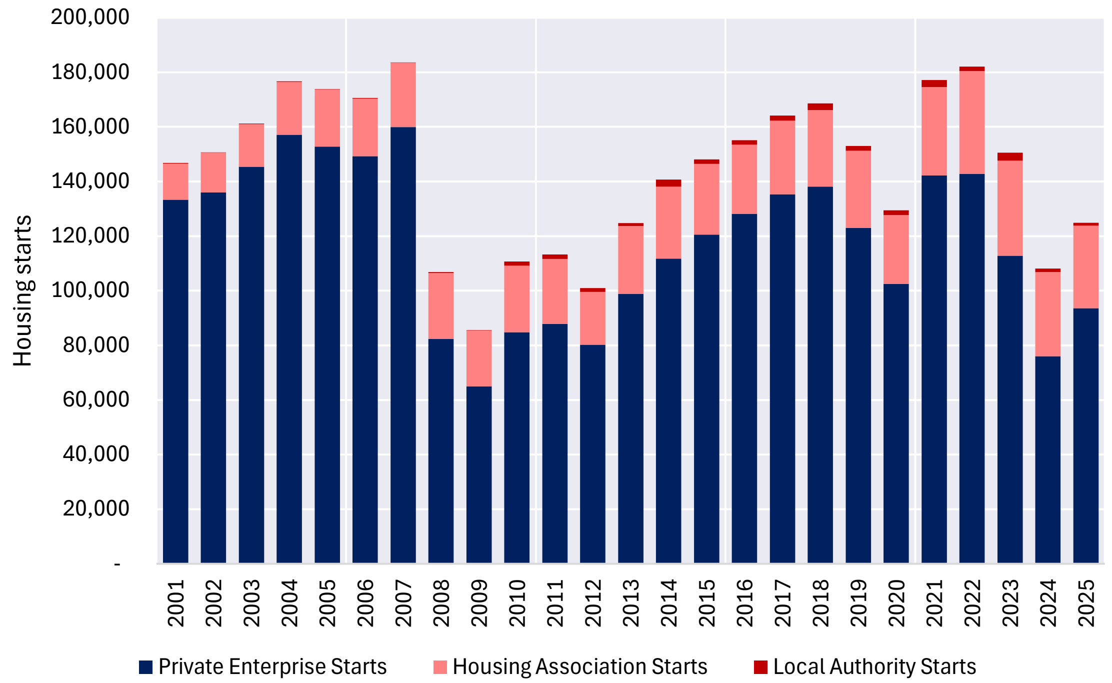
2.11 Housing starts provide a forward-looking indicator of housing completions and a closer reflection of recent market conditions (noting that completions lag starts by several years). The national housing starts position is shown in Figure 2.3 below.

2.12 House building in recent years has also been influenced by rapid increases in construction and labour costs since COVID-19. Together with higher interest rates (which feed through to finance costs for development and households' borrowing abilities), that has contributed to viability challenges on some schemes. There are other factors which have contributed to different market segments – with the impact of changing building safety standards on urban flatted schemes (and flatted markets) particularly notable.

2.13 These factors, together with the demand-side factors for the sales market described earlier, have led to a notable drop in new build housing starts from a peak of 182,070 reached in 2022 to a low point of 108,140 in 2024, and then 124,860 in 2025. Over the available data which stretches back to 1978, lower levels of starts were only recorded between 2008 – 2013 during the Great Financial Crash (GFC) and credit crunch. Private enterprise starts have been the most affected, with only 76,010 starts observed in 2024 and 93,570 in 2025. We are thus currently at a potential low point in a market cycle.

2.14 The national housing starts position therefore underlines the scale of the challenge facing housing development. There is a clear prospect that nationally, housing completions could continue to decline or remain low for several years.

Figure 2.3: Trends in House Building Starts across England, 2001-2025



Source: ONS, Table 244, March 2026

Housebuilding Trends in Horsham District

Housing completions

2.15 Next, we have moved on to update the analysis around housing delivery in Horsham District. Housing completions data for Horsham District since 2001 are shown in the Figure below. The analysis indicates that net completions over the 2001-25 period in the District have averaged 658 homes per annum, but there are clear differentials between different periods:

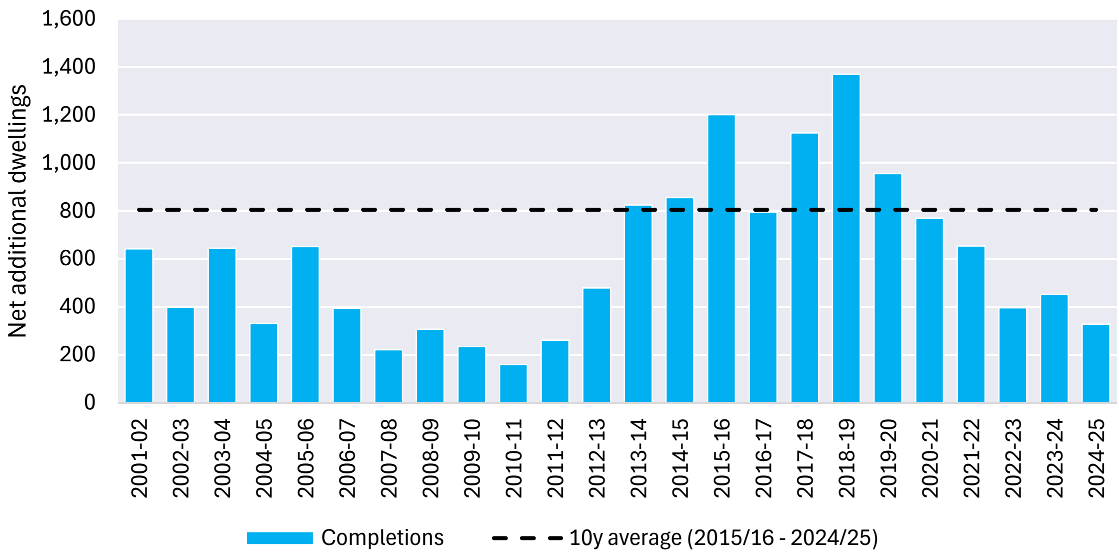
- Completions over the pre-recession period (2001-9) averaged 448 homes per annum. This is very similar to the Structure Plan housing requirement equivalent to 447 homes per annum.
- Over the 2009-13 period, net completions of 284 homes per annum were recorded. This was a period in which housing delivery was significantly impacted by the credit crunch and housing market downturn.
- From 2013-2022, net housing delivery averaged 950 homes per annum – a significantly higher level. This compares to an HDPF target of 800 homes per annum.
- Since 2022 (i.e. from 2022-2025), an average of only 392 dwellings per annum has been delivered. This is influenced by the water neutrality position.

2.16 Higher levels of housing delivery over the period from 2015-2022 is likely to have been influenced by a combination of economic circumstances, and the planning environment whereby the Council adopted the Horsham District Planning Framework (HDPF) in 2015. It is common for there to be a spike in housing completions around the time of a plan adoption and immediately thereafter.

2.17 The more recent dip in housing completions will have been influenced partly by national factors such as Brexit and Covid-19 followed by inflationary pressures and associated mortgage rate increases. However, there is also likely to have been a substantial reduction in development caused by water neutrality issues which has reduced the pipeline of consents coming through.

2.18 In the most recent monitoring year (2024-25) only 328 homes were delivered; and the Council's provisional analysis points to even weaker delivery in 2025/26 of 235 homes These are the lowest level of completions since 2011-12 which was during the credit crunch. Completions in 2024/25 were only 35% of the 2013-2022 average yearly delivery, a much larger decrease than seen in national data, reflecting the lack of consents granted due to water neutrality issues.

Figure 2.4: Housebuilding Trends in Horsham, 2001 - 2025

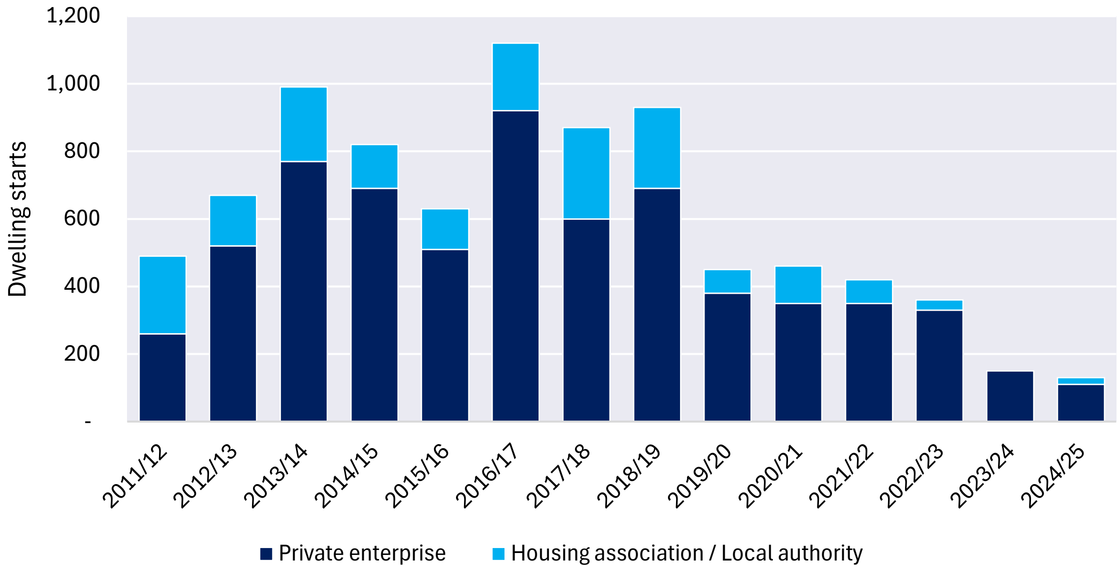


Source: Horsham Annual Monitoring Reports (2001-2025)

Housing starts

2.19 Housing starts in Horsham have seen an even greater decline than seen in recent housing completion data, as shown in Figure 2.5 below. The District averaged 714 starts per year from 2011 – 2021, with over 1,000 in 2016/17. However, since 2021 there have been only 265 dwelling starts on average per annum. The most recent two years of data (just 150 starts in 2023/24 and 130 in 2024/25) are particularly low and reflect the effects of water neutrality requirements which inhibited the granting of planning consents by the Council. There will have been some housing delivery from existing consents in earlier years (prior to 2021). The provisional data for 2025/26 points to a slight improvement, with 370 starts but highlights that it will take time for housing delivery to recover fully in the District.

Figure 2.5: Trends in new housing starts in Horsham District, 2011 – 2025



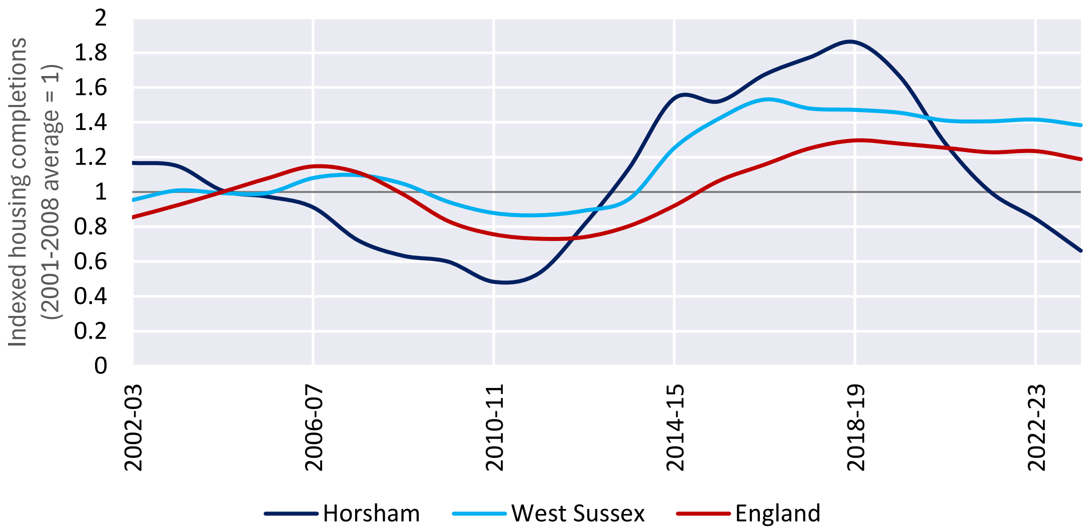
Source: HDC Completions Data

2.20 Whilst Natural England's direction has been rescinded, its effect remains borne out in a very low (or weak) current residential development pipeline in Horsham District.

Benchmarking local completions

2.21 Setting historic housing delivery in context, the figure below provides an indexed comparison between delivery rates in Horsham District, West Sussex and England. The Figure uses three-year averages and is indexed against the average delivery rates across the pre-recession period (i.e. the period from 2001 to 2008) to allow comparisons between different geographies. It shows that Horsham saw weaker performance in the latter part of the 2010s, but then comparatively strong housing delivery performance between 2014-20. Housing delivery has however tailed off rapidly in recent years, linked to the water neutrality constraints and delayed progress with a new Local Plan.

Figure 2.6: Indexed Comparative Housebuilding Trends (2001-2022); 3-year Average



Source: MHCLG Live Table 122

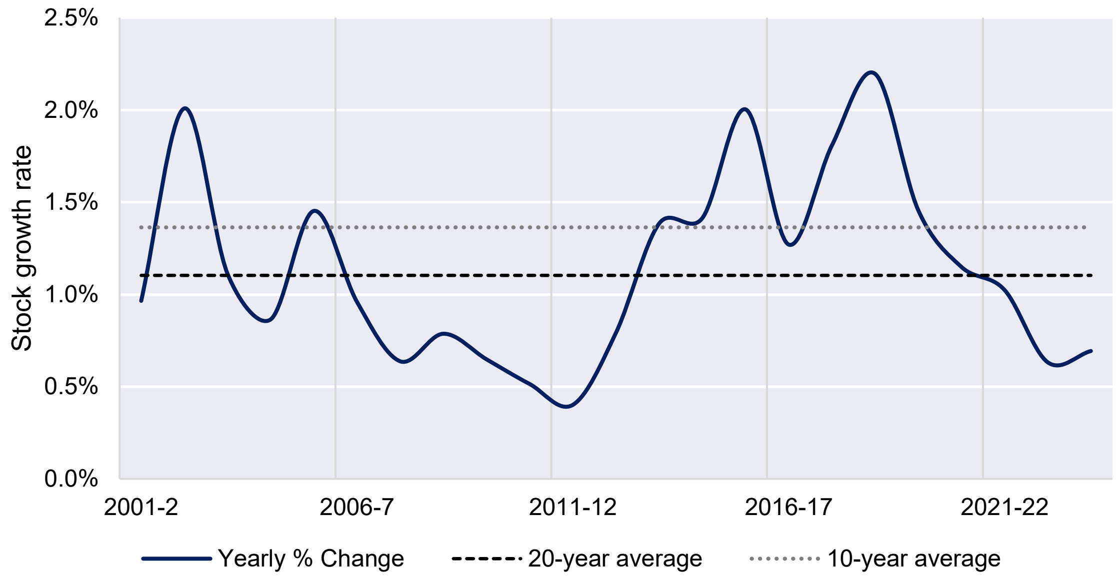
Housing Stock Growth

2.22 Housing stock growth rates (expressed as compound annual growth rates or CAGRs) can be used to consider housing development in the context of the level of housing stock in an area, noting that larger or more population authorities should be able to sustain higher development rates. They can also be used to benchmark housing delivery performance against other areas.

2.23 The following figure shows the annual housing stock growth rate achieved in Horsham since 2001. This is another way to consider the data shown in Figure 2.4 above. The high rates of development in the mid 2010s are visible on this chart in the form of housing stock growth rates reaching 2% or higher, a rate also reached in 2002-03. In contrast, following the GFC and during the credit crunch stock growth rates declined to a low point of 0.4%, while in 2022-23 they sat at 0.6%.

2.24 Over a long-term 20-year period (essentially a full economic cycle or full plan period), Horsham has sustained an annual average housing stock growth rate of 1.1%. The growth rate over the last 10 years has been higher at 1.4% notwithstanding the recent water neutrality issues.

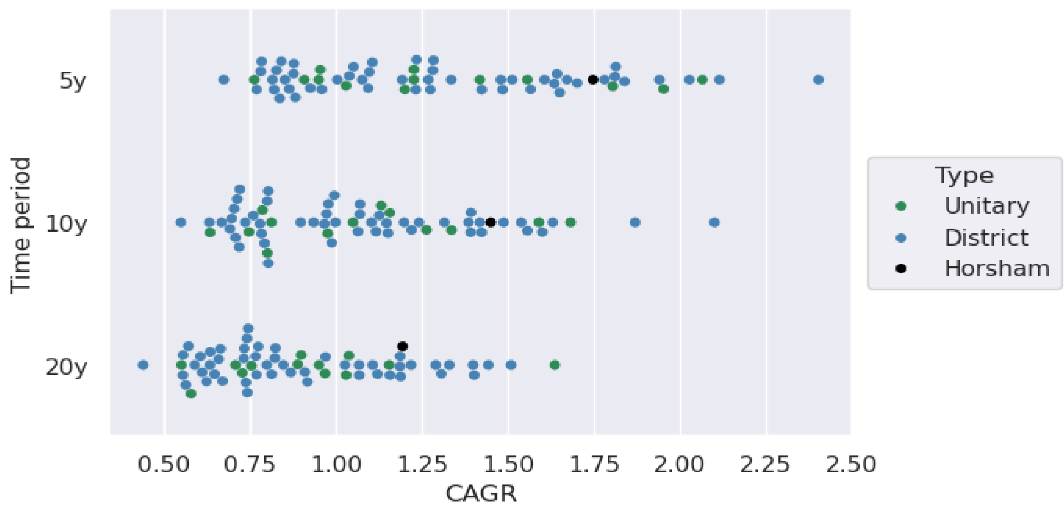
Figure 2.7: Housing Stock growth rates achieved in Horsham, 2001/2-2021/22



Source: MHCLG Live Table 125

2.25 The following figures put Horsham's housing stock growth rates in context by showing the maximum 5-year, 10-year and 20-year growth rate achieved in each authority in the South-East Region since 2001. This illustrates that while many authorities have performed more poorly than Horsham, there are clear precedents for higher rates of growth. High growth rates achieved in other authorities have been around 1.4% - 1.6% over a full economic cycle (20 years), up to around 2.0% over the medium term (10 years), and over 2.0% in a greater range of authorities in the short term (5 years).

Figure 3.7: Indexed Comparative Net Changes in Housing Stock



Note: Each authority is represented by one dot for each time period.

Source: Iceni analysis of MHCLG Live Table 125

2.26 Maximum longer-term growth rates are lower than maximum short-term growth rates, reflecting that delivery may peak over a short period while a longer period (say 20 years) may include periods of high and low delivery. Delivery rates are influenced by the economic cycle, as well as what rates of housing growth are being planned for through the planning system.

2.27 The following table provides more context on several authorities which have achieved high housing stock growth rates. Horsham's performance is also shown for context. Several of these authorities have similar market characteristics to Horsham, including being predominately rural but with a main town or a number of main towns; accessible to London but without substantive areas within the Metropolitan Green Belt; and having a relatively high value housing market in a regional or national context.

Table 2.1: Maximum housing stock growth rates (CAGR) achieved since 2001 over 5, 10 and 20 years in several high-growth authorities and compared to Horsham

Local Authority	5-year	10-year	20-year
Vale of White Horse	2.4%	2.1%	1.5%
Cherwell	2.1%	1.9%	1.3%
Milton Keynes	2.0%	1.7%	1.6%
South Oxfordshire	1.8%	1.5%	1.1%
Maidstone	1.9%	1.6%	1.4%
Wokingham	2.1%	1.6%	1.2%
West Oxfordshire	1.8%	1.4%	1.3%
Bracknell Forest	1.8%	1.3%	0.9%
Winchester	1.7%	1.4%	1.2%
Dartford	2.0%	1.6%	1.4%
Ashford	1.8%	1.5%	1.4%
Horsham	1.7%	1.4%	1.2%

Source: Iceni analysis

2.28 Authorities in Oxfordshire around Oxford feature heavily in this list. The Oxfordshire SHMA in 2014 identified a substantial housing need of around 100,000 over twenty years. Local plans were put in place shortly thereafter in Cherwell and Vale of White Horse, with West Oxfordshire's Local Plan adopted in 2018 and South Oxfordshire's in 2020. Oxford also declared an unmet need given its constrained boundaries, requiring surrounding authorities to increase housing delivery rates to contribute to meeting this as well as supporting broader economic growth potential. Recent housing development in these authorities illustrates the potential for ambitious local planning policies to secure much higher levels of housing delivery compared to historical rates.

2.29 For comparative purposes, the Government's stated ambition to sustain delivery of 300,000 homes per year across England would equate to an annual growth rate in the housing stock nationally of

1.1% pa. Clearly areas in higher demand markets such as those in parts of the South East could be expected to support higher housing delivery rates than the national average if this level housing provision is to be achieved across England. In the context of Government's ambition to significant boost housing supply and of stronger historical delivery performance in some areas with similar market characteristics, the long-term delivery performance of 1.2% pa in Horsham cannot be seen as an absolute limit on what is realistic in the future.

2.30 It should be noted that in the context of Central Government's ambition to increase overall housing delivery nation-wide and in many parts of the country, past trends in housing delivery (for example the stock growth rates shown above) should be viewed as a guide to future outcomes only rather than an absolute ceiling. As illustrated by the Oxfordshire examples, there is likely to be scope for higher housing stock growth rates to follow ambitious local planning if adequately supported by infrastructure. However, it may be challenging for an authority to deliver housing stock significantly in excess of the maximum rates seen elsewhere (and reported in the table above).

Sales Market Dynamics

House Prices

2.31 House price geography can be understood at a number of different tiers, considered below. At a regional level, Horsham shows higher house prices in proximity to London. At a sub-regional level, we see higher housing costs in Surrey and parts of Hampshire than in West Sussex. There is a similarity in house prices between areas in Horsham and Mid Sussex districts.

2.32 The table below provides comparisons of mean, median and lower quartile prices at a District level. When compared to regional and national rates, figures for Horsham are significantly higher. The median house price in Horsham is £437,000, some 14% above the South East average of £383,000. Sales values are generally similar to those in Mid Sussex and above those in Crawley and in Sussex Coast authorities.

Table 2.2: Median and Lower Quartile House Prices in the Housing Market Area

Area	Median	Lower Quartile
Horsham	£437,000	£335,000
Crawley	£355,000	£290,000
Mid Sussex	£440,000	£325,300
West Sussex	£385,000	£295,000
South East	£383,000	£280,000
England	£300,000	£200,000

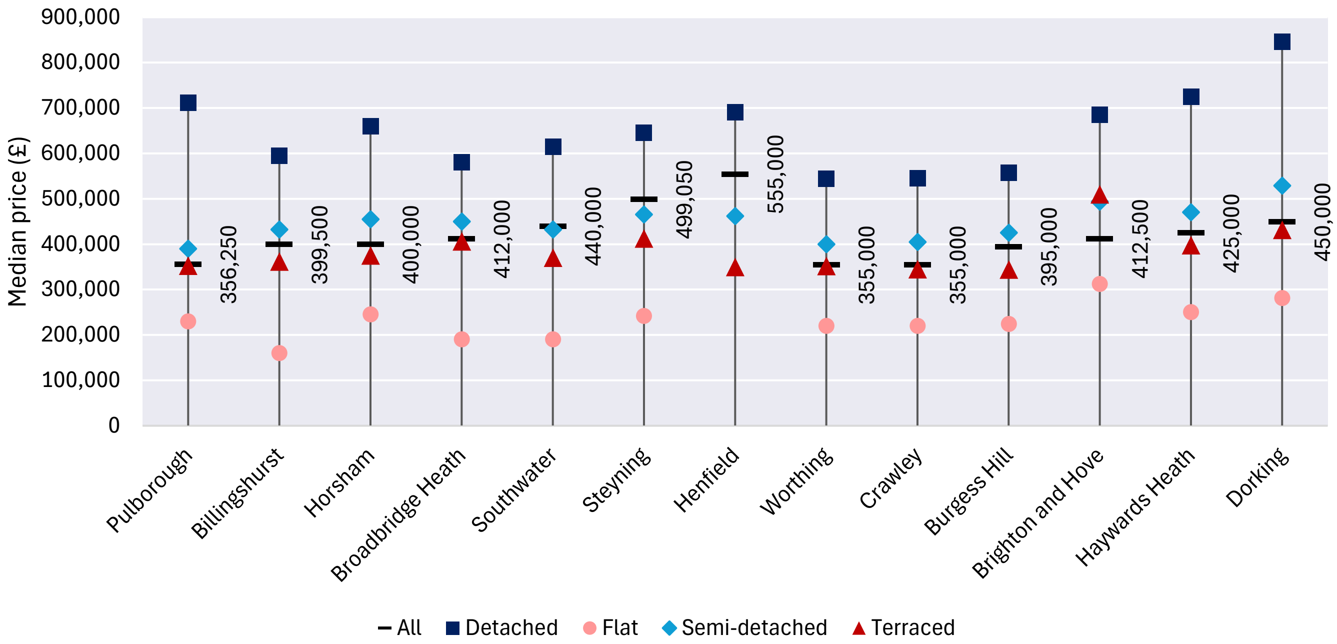
Source: ONS, House price statistics for small areas in England and Wales, year ending September 2025

2.33 At a more local level, we find an urban/ rural distinction in house prices influenced by differences in the housing stock and profile of sales (with higher sales of larger, more expensive homes in rural areas) as well as an influence of 'quality of place' on house prices.

2.34 Looking at prices in Horsham's main settlements and those in surrounding areas, settlements such as Pulborough, Henfield, and Southwater have the highest prices. Prices in Horsham Town average around £400,000, while Pulborough has the lowest median price (although a very high price for detached homes).

2.35 Lower prices are evident in Crawley and Worthing (£355,000), which are larger urban areas. In contrast, Haywards Heath, Dorking and Brighton and Hove have notably higher prices than Horsham's larger towns.

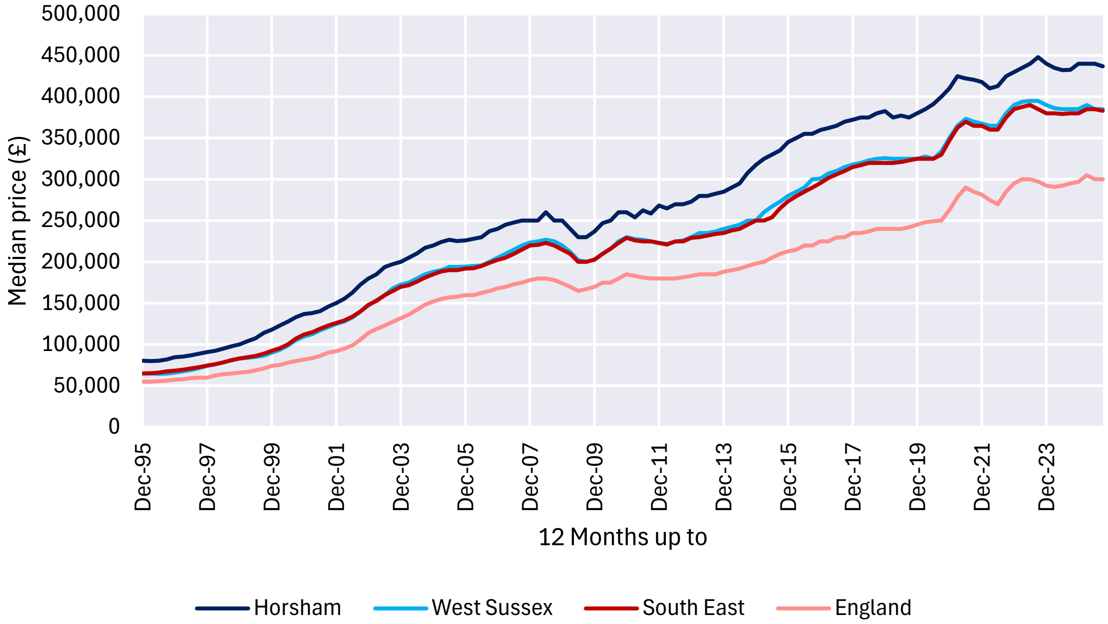
Figure 2.8: Median house prices by build up area – 12 months to September 2025



Source: Iceni analysis of HM Land Registry *Price Paid Data*

2.36 Housing prices have been relatively flat in Horsham and most parts of England in recent years, as shown in the figure below. While prices increased steading from around 2009-2020, they are now only slightly above the 2020 level. Given recent inflation and wage growth, this means that house prices have declined in real terms over the last 5 years.

Figure 2.9: Median house prices in Horsham and Comparators, 1995 – 2025

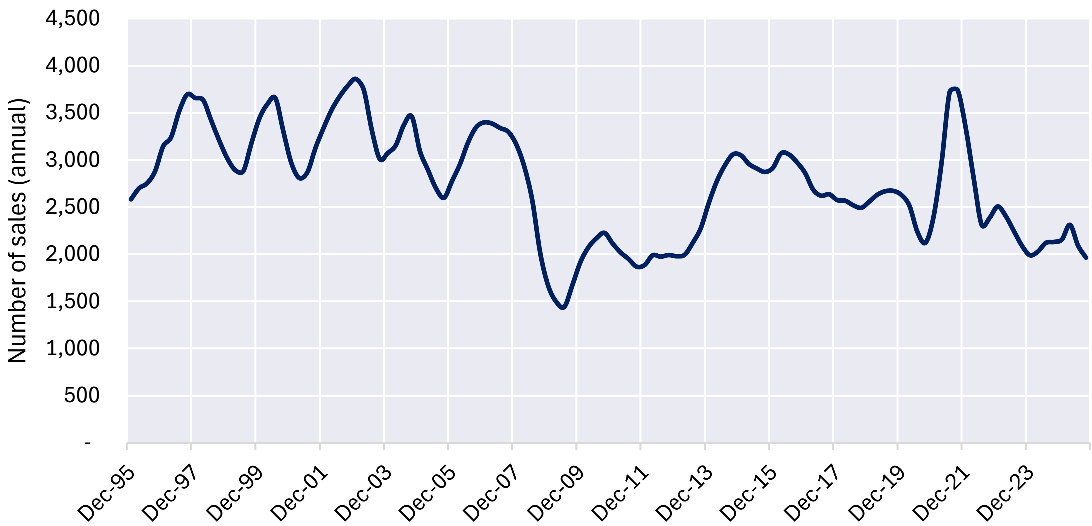


Source: ONS, September 2026

Sales Volumes

2.37 The number of residential sales is an indicator of the strength of the local market and the level of demand. As shown in the figure below, the number of annual sales in the Horsham District has been broadly declining over time, apart from a sharp spike in 2021 during the stamp duty holiday (discussed earlier in this chapter). Current sales volumes are similar to those in 2010/11 during the 'credit crunch.'

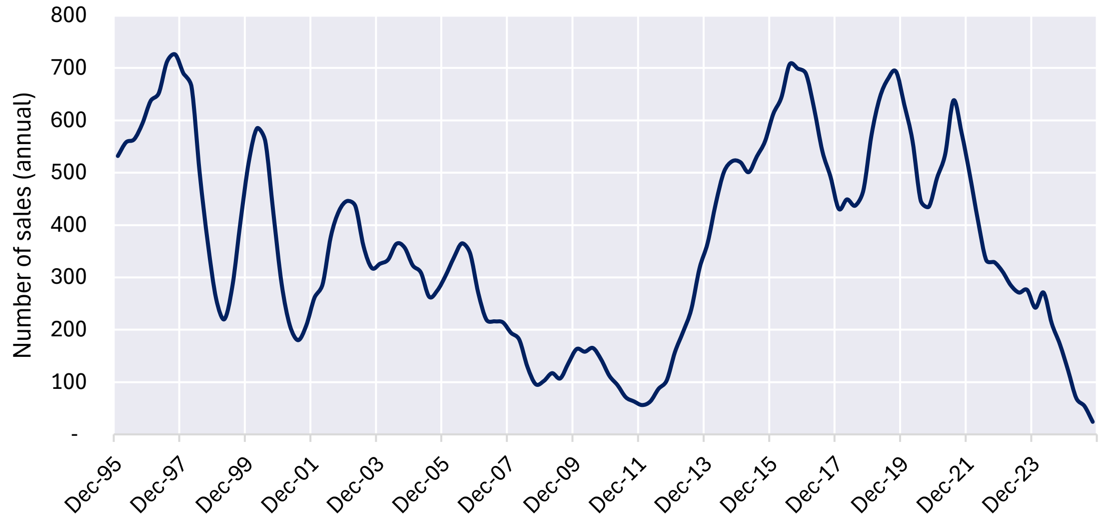
Figure 2.10: Total residential sales - Horsham District



Source: ONS, HM Land Registry, 2024

2.38 In contrast, the number of new build sales in the Horsham District has seen a much more dramatic decline, as shown in the figure below. While new build sales rates were high from around 2013 – 2021, they have since dropped to nearly zero and in the most recent data were below the level seen during the post-GFC credit crunch.

Figure 2.11: Number of new build residential sales in Horsham District



Source: ONS, HM Land Registry, 2024

2.39 The extent to which this low rate of new build sales is a reflection of market realities or constrained newbuild housing supply can be seen by considering the percentage of all sales that are new builds. This is an indicator of how the new build market is tracking against the overall housing market.

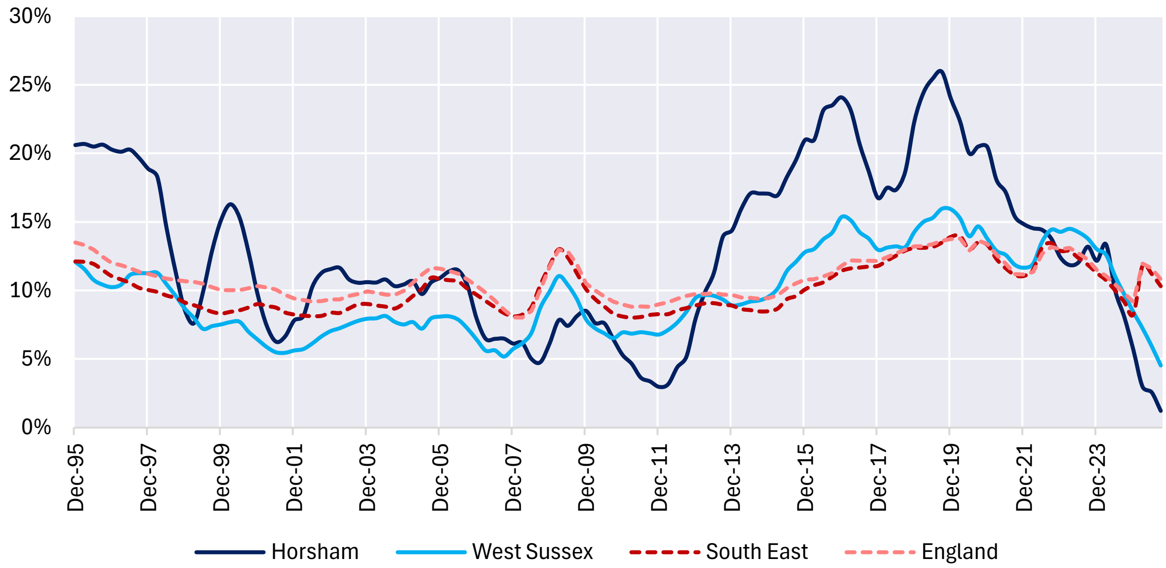
2.40 Figure 2.12 below calculates this percentage and compares it to broader benchmarks. This is followed by Figure **2.13** which shows the performance of several high growth authorities noted in Table 2.1 earlier in this chapter.

2.41 There has been considerable variability in the percentage of sales which are new builds in Horsham District over time. The proportion of sales which were new builds increased from a typical historical level of around 10% to around 20% and up to 25% in the second half of the 2010s reflecting higher levels of housing delivery. Since then, new build sales dropped towards typical historical percentages of around 10% - 12% of sales in 2023-2024, before dropping sharply towards zero in more recent data (consistent with low levels of housing completions as discussed above).

2.42 In contrast, the percentage has been relatively stable in England and the South East, varying between around 9% - 14% and averaging around 10%. In this context, Horsham was performing well above broader benchmarks in the 2010s. However, the recent significant drop in new build sales in Horsham is out of keeping with broader market movements; and so supply constraints in the form of water neutrality requirements are likely to be the strongest cause (noting that West Sussex's result as shown below will also be impacted by water neutrality requirements).

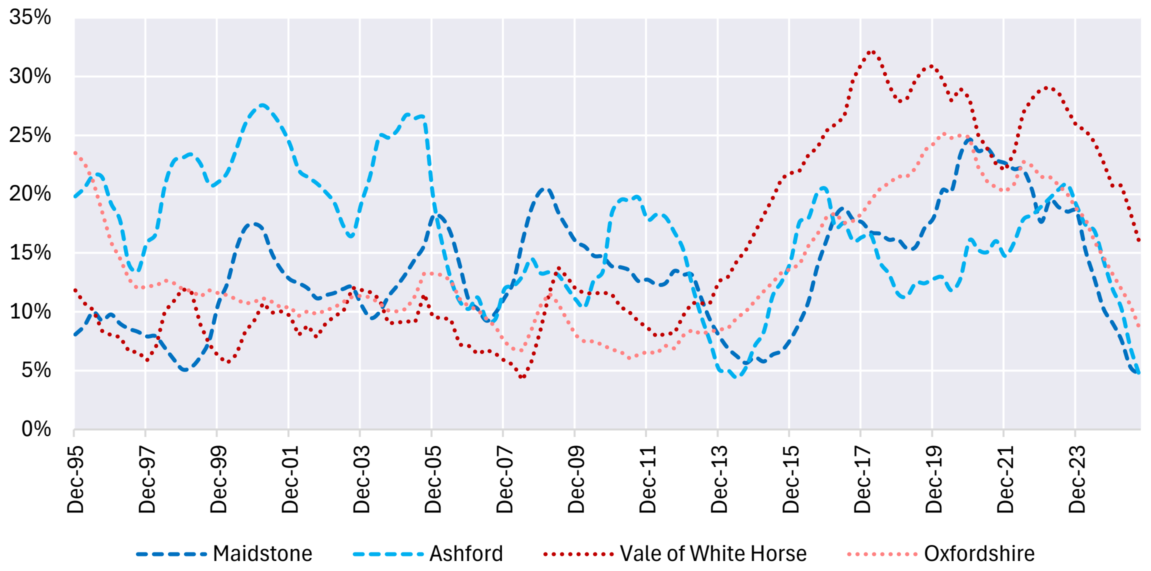
2.43 Part of the reason for the high percentages seen in the 2010s in Horsham is likely to be the Help to Buy (HTB) Loan Scheme, which provided a low interest loan from the government for a portion of the purchase price of a new build house. It operated from April 2013 until March 2023 (which applications closing in October 2022) and was restricted to first home buyers in April 2021. The scheme accounting for more than 40% of sales in the Horsham District between around 2017-2021.

Figure 2.12: Percentage of residential sales which are new builds – Horsham and benchmark areas



Source: ONS, HM Land Registry, 2024

Figure 2.13: New build sales performance – high growth Local Authorities



Source: ONS, HM Land Registry, 2024

2.44 Figure 2.13 above illustrates the potential for new builds in a high growth context to constitute up to 30% or more of total residential sales, with multiple examples of rates of 20% or above over a medium-term timeframe. In this context there is substantial headroom between current new build sales percentages in Horsham and the percentages in these high-growth areas (and indeed in Horsham in the late 2010s).

Agent Engagement

2.45 Iceni have undertaken market research speaking to the estate agents operating within the District and surrounding areas. Key locations include Billingshurst, Southwater and Crawley. The narrative reflects market conditions at the time of the assessment in May 2026.

2.46 Horsham continues to demonstrate diverse demand within the sales market, underpinned by its strategic location and high-quality local offer. Proximity to Gatwick Airport is a key driver, with agents noting that potential expansion, including an additional runway, could further strengthen demand.

2.47 Agents note that Horsham also benefits from excellent connectivity to London, supporting commuter demand and attracting London-based movers seeking greater value. As a result, Horsham appeals to a broad buyer base, including families, upsizers, downsizers and relocating households.

2.48 The town's attractiveness is reinforced by its vibrant town centre, with a growing mix of cafés, restaurants and independent retailers, alongside community events such as Friday Lates. The surrounding countryside and nearby villages further enhance its appeal, particularly among family buyers seeking a balance between rural character and accessibility.

2.49 In terms of market dynamics, new-build and retirement-led schemes play an important role in supply. However, agents report that developers are increasingly relying on tailored incentives, such as contributions towards Stamp Duty, legal fees and moving costs to maintain sales rates. This reflects ongoing affordability pressures, particularly among marginal buyers. At the same time, competition is increasing, including from households relocating from higher-value areas, which continues to place upward pressure on house prices.

2.50 Billingshurst reflects similar trends within the sales market, with demand driven by rail access to London, connectivity to Gatwick and an excellent educational offer. However, relatively high prices limit access for first-time buyers, meaning demand is primarily concentrated among established households and family movers. Increasing the delivery of smaller and more affordable homes would help to broaden access and support local housing needs.

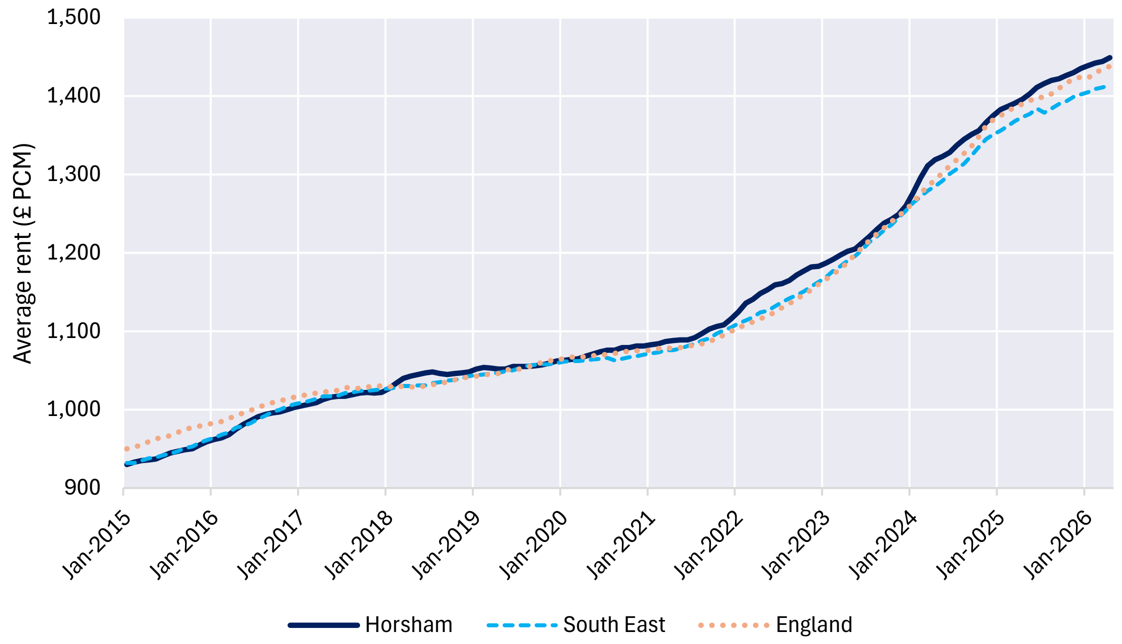
Rental Market Dynamics

Rental levels

2.51 As of April 2026, average private market rents in Horsham District sat at £1,449 per calendar month (PCM), marginally higher than that for the South East (£1,414), and higher than for England as a whole (£1,438). By comparison, average rents in Horsham were only £975 PCM ten years earlier in April 2016. Price growth has been similar across different geographies – with the 39% growth in average rents in Horsham District broadly aligning with that across the South East (37%) and England (40%).

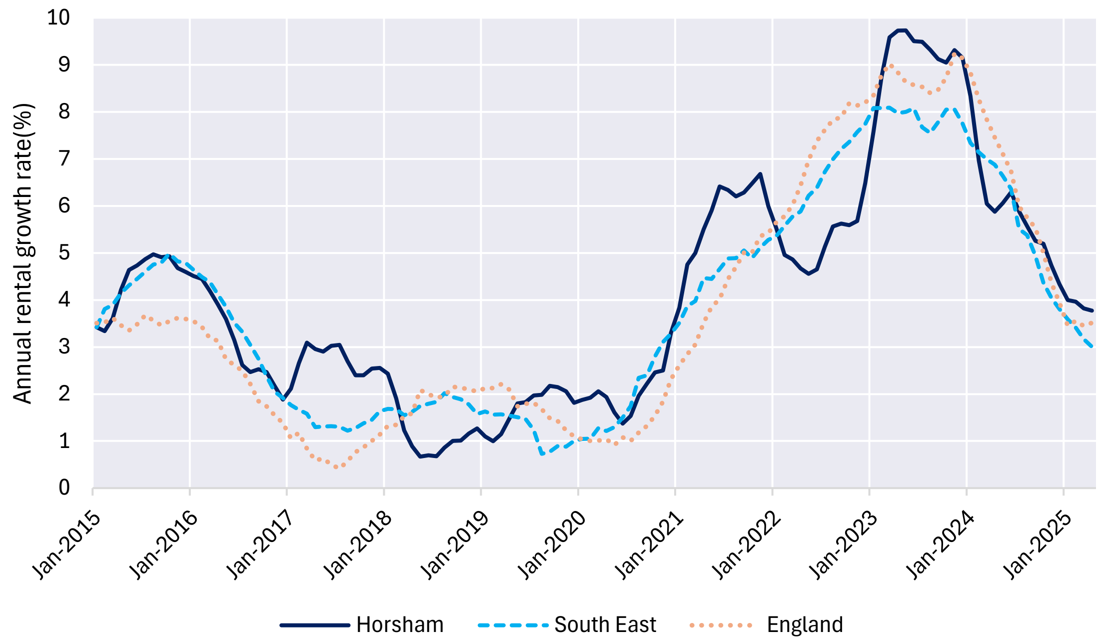
2.52 There has been a rapid increase in private sector rents in recent years, as shown in the figures below – indicative of supply/demand imbalance for homes to rent. Annual rental growth rates in Horsham and across the South East and England has typically been around 1% - 4%. More recently, annual growth rates escalated to peak at nearly 10%. While growth rates have now dropped to around 4%, this is still a relatively high rate of growth.

Figure 2.14: Average private housing rents



Source: ONS *Price Index of Private Rents*

Figure 2.15: Average private housing rents



Source: ONS *Price Index of Private Rents*

2.53 The private rental market is relatively concentrated in the town of Horsham. As of June 2026, there were 128 properties advertised for rent in the Horsham District on Rightmove. Of these, almost half (46) were located in Horsham or Broadbridge Heath, with 20 in Kilnwood Vale, 11 in Pulborough and West Chiltington, and only five in Billingshurst and four in Southwater.

2.54 Data from the 2021 Census shows a similar pattern, with 9,080 private rental households across the District of which 4,177 or 46% were in the town of Horsham (i.e. the unparished area or the North Horsham or Broadbridge Heath parish). The next largest number of private rental homes were in Billingshurst (561 or 6% of all private rentals) and Southwater (493 or 5% of all private rentals), with smaller numbers in a variety of other settlements.

2.55 This pattern in part reflects that Horsham is by far the District's largest settlement, with around 40% of households. It also has a relatively high proportion of housing in privately rented compared to other areas (16.9% of households compared to 10.9% in Southwater, 12.7% in Billingshurst and 13.8% elsewhere). However, given that Southwater, Billingshurst and several other larger towns also had at least 10% of homes privately rented, there does appear to be a moderately sized private rental market across multiple parts of the District.

2.56 According to rental data reported on home.co.uk and shown in the table below, Horsham and the northern parts of the District have the highest private rents. Rents are somewhat lower around Southwater, Billinghurst and nearby smaller settlements, and lowest in the southern rural part the District.

Table 2.3: Median private rental costs by postcode district (PCM)

	1 bed	2 bed	3 bed
RH12 – Northern and Western parts of Horsham Town and northern rural areas	£1,200	£1,600	£2,000
RH13 – Eastern part of Horsham Town, Southwater and surrounds	£1,150	£1,400	£1,700
RH14 – Billingshurst and surrounds	£1,000	£1,350	£1,800
RH20 – Southern rural areas	£935	£1,450	£1,650

Source: Home.co.uk

Agent Engagement

2.57 As with the sales market, Iceni have consulted a range of estate agents operating within the District and surrounding areas to understand the local drivers behind the rental market.

2.58 Agents report that rental market remains strong, reflecting continued demand and relatively low supply. High levels of activity were reported across all property types, with demand across the broader area as well as Horsham.

2.59 The relative affordability constraints within the owner-occupier market are contributing to sustained pressure in the rental sector at the time of writing, as some households delay homeownership and remain in rented accommodation for longer. Agents also noted rising mortgage rates and elevated deposit requirements as contributing to this problem recently. This dynamic is particularly evident among younger households and first-time buyers who are unable to access the sales market without assistance.

2.60 Investor interest remains relatively strong, supporting the continued supply of rental stock. However, agents note that regulatory changes are beginning to influence landlord behaviour. New legal requirements are prompting some landlords, particularly those operating at the margins of compliance or relying on high rents without reinvestment to exit the market. While this may improve overall standards, it also risks reducing supply in the short term, exacerbating existing upward pressures on rents.

Horsham Town

2.61 Rental demand across Horsham as well as the wider area was reported to be supported by connectivity to Gatwick Airport and London. The presence of airport-related employment, alongside commuting patterns, generates consistent demand from working households requiring flexible access to both employment centres. This includes younger professionals, relocating workers and households priced out of the sales market.

2.62 Within Horsham Town, demand was reported to be particularly strong in neighbourhoods with strong primary school catchments, access to green space and proximity to the Town Centre. Family-sized properties, especially two- and three-bedroom homes, are in especially short supply. By contrast, areas such as Roffey experience slightly weaker demand and lower rental values, although this is partly due to lower turnover and fewer listings. Demand patterns also vary by lifestyle, with commuters prioritising proximity to Horsham station and favouring apartments.

Crawley and Ifield

2.63 Crawley provides a useful reference point for rental dynamics in the northern part of the Horsham District. Demand in Crawley was noted to be strongly influenced by Gatwick-related employment. The town attracts a high proportion of first-time renters and local workers, showing how airport connectivity underpins both sales and rental demand across the sub-region.

2.64 Ifield is located next to Crawley, with a strongly connected housing market. It has a varied tenant profile including corporate tenants linked to Gatwick Airport. These tenants tend to concentrate their searches in North Ifield and Crawley, where there is convenient access to the airport.

Billingshurst

2.65 The rental market in Billingshurst was noted to have constrained supply and steady underlying demand. A reduction in available rental stock has been driven in part by landlords exiting the market.

At the same time, demand has remained relatively constant, resulting in a high level of rental demand relative to supply. There has been a shift towards longer tenancy durations as households opt to remain in place amid limited alternatives and ongoing affordability pressures.

2.66 Billingshurst benefits from its mainline rail station. While the area attracts some London commuters, this was noted not to be a dominant driver of demand. Prospective tenants were mixed with some singles and young couples described as 'would be first time buyers' and some families who rent out their own properties to other tenants.

2.67 Although Billingshurst was noted to continue to be a viable location for investment, given its connectivity and relative affordability, there are currently fewer active investors in the market compared to previous years. This reflects broader market uncertainty and reduced yields in the buy-to-let sector.

Southwater

2.68 The rental market in Southwater was reported to be shaped by its strong appeal to families and working professionals seeking a quieter, village-oriented environment within close proximity to Horsham. The settlement attracts a mix of professional couples and single individuals employed in Horsham and Crawley, alongside a notable proportion of family households.

2.69 Demand from families is particularly concentrated around key primary school catchments, especially in central Southwater and areas such as The Forge and Angle Close, where access to infant and junior schools drives sustained interest in two- and three-bedroom properties.

2.70 Seasonal patterns are evident, with heightened rental demand typically occurring in the summer months (June to August), aligned with the academic calendar and household moves ahead of the new school term. In addition, there is a strong degree of localised demand, with existing residents often seeking to remain within Southwater when moving home.

2.71 Southwater's location is a key driver of its rental profile. Situated approximately 10 minutes from Horsham, it offers convenient access to a larger town centre while retaining a quieter, less urban character that is particularly attractive to families. Its connectivity to Gatwick Airport, approximately a 20-minute drive, supported by rail and bus links also underpins a degree of demand linked to airport-related employment.

2.72 In Southwater there are early signs that rental stock levels are beginning to stabilise following regulatory changes, with more properties returning to the market in recent months. Investor interest has historically been present in the area, although there are the same wider market constraints as seen elsewhere.

Summary

2.73 Overall, estate agent engagement suggested that rental demand across Horsham and surrounding settlements remains robust, supported by strong employment linkages, constrained access to homeownership and the area's overall quality of place.

2.74 Well-connected locations near Gatwick (such as Horsham and Ifield) are to experience the strongest demand. Southwater, Billingshurst and smaller towns have smaller rental stocks but were noted to have robust rental demand and relatively limited supply. Demand in Billingshurst is also supported (although this is not the dominant portion of the market) by connectivity to London.

2.75 A range of different types of households were reported in the rental market, including a strong cohort of families. In this context, there may be demand for the provision of rental housing delivered through greenfield development (e.g. suburban build to rent) around each of the District's principal towns, although prospects appear best near Horsham, Ifield or otherwise in the northern part of the District.

3. DELIVERY OF STRATEGIC SITE OPTIONS

3.1 In this section, Iceni has moved on to consider issues relating to the delivery of the strategic site options – including both strategic sites identified in the draft Plan at Regulation 19 and other prospective strategic sites. As part of this, we have taken into account the latest information from site promoters and other elements of the Plan's evidence base (as discussed in Appendix A1); and considered the potential lead-in time to delivery of completions on site; and the potential build-out rate of individual sites. The analysis is then used to inform our review of the Council's latest housing trajectory and our own sub-area based housing trajectory models which are set out in Section 4.

3.2 In order to understand the likely pace and phasing of the potential strategic site options, Iceni has drawn on a combination of:

- The latest site-specific information submitted to Horsham District Council officers in Spring 2026;
- Direct engagement with site promoters undertaken by Iceni via virtual meetings throughout April and May 2026;
- The Council's evidence base documents including the Infrastructure Delivery Plan and the Viability Study; and
- Where necessary, historic information submitted to inform the previous Regulations 18 and 19 Consultation.

3.3 A proforma was sent by the Council to each of the promoters of the strategic sites to collect relevant information, following similar proformas being collected during the initial 2020 Horsham Delivery Study. The proformas sought to collect information regarding landownership and promotion agreements; progress with site investigations and masterplanning; timeframes for the submission of planning applications and anticipated timeframes for delivery of the sites. It also sought information regarding the delivery model as well as major infrastructure requirements and this might influence the delivery of the site.

3.4 Iceni critically reviewed the information provided, discussed delivery issues and challenges with potential site options with Horsham District Council officers, and factored in both published research on housing delivery rates and our own experience and research in this area. Iceni then engaged with site promoters through meetings in Spring 2026 to take account of the latest information at that point.

Reviewing Existing Strategic Sites

3.5 An important component of assessing strategic sites is understanding the number of homes that can be built out on site over a number of years of delivery in the District using historic evidence ('build out rates'). In addition, it is also important to understand how quickly planning applications can progress from submission to determination; and how long it then takes for housebuilders to reach first completions (the 'lead in time').

3.6 It is noted that there is a range of national research[4] which has considered lead-in times and build out rates of strategic sites; however, this is backward looking and does not have regard to *local* market dynamics or the specific nature of development proposed at different sites and the associated delivery strategy. To inform our assessment of strategic sites, Iceni has sought to review the Council's annual monitoring data and planning records relating to existing strategic sites to establish a *local* baseline which assumptions on delivery can be related to and which can be drawn together with consideration of the specific development proposals at different potential strategic sites/ locations.

3.7 Iceni has drawn on a number of extant strategic site allocations which are all noted below:

- West of Horsham, including:
    - Land South of Broadbridge Heath (i.e. West of Horsham (West)) – this development is completed and now known as Wickhurst Green
    - Land East of the A24 (i.e. West of Horsham (East) or "Highwood")
- North of Horsham ("Mowbray")
- Land at Kilnwood Vale ("West of Crawley" or "West of Bewbush")
- Land West of Southwater ("Broadacres")

3.8 Iceni has reviewed (1) the lead-in times through from the submission of an outline planning application to determination to first completions; and (2) the build out of these strategic sites over the period from 2012/13 to 2024/25. Dealing with the former first, Iceni has tabulated three key stages of the planning and development process for each of the sites set out including the submission of an application, granting of outline/full planning permission and first completions on the first phase of delivery. This is set out it in Table 3.1 below.

[4] For instance Lichfields' Start to Finish research

Table 3.1: Timeframes from Submission of Application to First Completions (Months)

Site	Site Size	Planning Approval Period	Planning Approval to Delivery Period[5]
North of Horsham	2,750 homes	21	38
Kilnwood Vale	2,500 homes	15	24
West of Horsham (East)	1,090 homes	10	24
West of Horsham (West)	942 homes	23	24
West of Southwater	600 homes	15	24

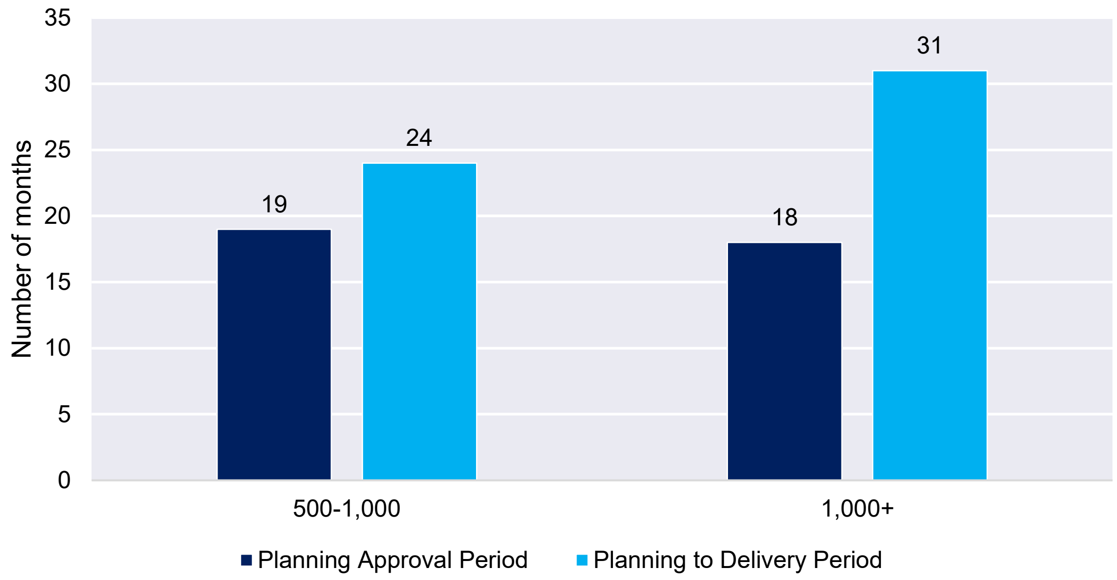
Source: Horsham Monitoring Records

3.9 Drawing on this sample of strategic sites, we can establish a baseline position that can in turn be used to sense-check assumptions for prospective strategic site allocations. Figure 3.1 below shows that sites between the threshold of 500 to 1,000 homes have taken an average of 19 months to work through the planning determination period and around 2 years (i.e. 24 months) thereafter to achieve first completions.

3.10 The District's larger sites have taken less time to work through the application process on average. The average time taken to reach first completions is skewed by North Horsham at 3 years with both Kilnwood Vale and West of Horsham at taking around 2 years to achieve first completions. Across all sizes, the time elapsed through securing reserved matters consent, discharging pre-commencement conditions and delivering homes is broadly consistent.

[5] Approximate – due to the nature of how completions are monitored (i.e. on-site once a year), it is not possible with the current monitoring records to identify the specific month where first completions were achieved. It is therefore linked to financial years.

Figure 3.1: Delivery Timescales, Strategic Sites by Size (Avg.)



3.11 Whilst there is some variance across sites, a reasonable benchmark across all the sites considered would be around 18 months for planning approval and then a further 24 months or so to first completions; meaning **from submission of an outline planning application, first completions would be achieved within around 3.5 years**.

3.12 In respect of housing completions, Table 3.2 below sets out the number of homes delivered so far over the period 2012-2025 on four of the strategic sites which have already reached first completions stage – West of Horsham (East), West of Horsham (West), Kilnwood Vale and Land West of Southwater. In addition to these allocated sites which are all located in the north of the District, we have also sought to consider an additional strategic site which has come through the planning application route – Land East of Billingshurst (marketed as Amblehurst Green) – in order to better understand the position across the District.

3.13 It should be noted that between since September 2021 – October 2025 water neutrality issues led to a general constraint on housing development for schemes without planning permission in place. However, the schemes in Table 3.2 below all had planning permission and have not been held up in delivering over this period.

Table 3.2: Housing Completions on Strategic Sites, 2012-2025

Site:	W of Horsham (East)	W of Horsham (West)	Kilnwood Vale	W of Southwater	E of Billingshurst
Site Size:	1,090 homes	942 homes	2,500 homes	600 homes	550
Max Outlets:	1	4	3	1	2
2012/13	61				
2013/14	36	108	75		
2014/15	103	209	76		
2015/16	76	336	131		
2016/17	96	217	51		
2017/18	39	24	353	56	
2018/19	74	24	196	128	89
2019/20	43	0	74	43	74
2020/21	1	24	199	20	211
2021/22	172		95	54	61
2022/23	35		162	16	0
2023/24	12		57	39	
2024/25	0		157	0	38
Average	**62**	**118**	**136**	**51**	**79**

Source: Horsham Monitoring Records

3.14 If West of Horsham is treated as a strategic development location, the evidence above shows that peak average delivery on this site was therefore 345 homes per annum over the 2014-17 period (i.e. a three-year average).

3.15 As is clear from our analysis, the average number of homes achieved on average year-on-year and site-by-site varies. Looking at average build out rates, sites with one outlet have achieved around 60 homes per annum over recent years; with this rate averaging out at around 40 homes per annum per outlet on sites with more than one developer– although it is noted that there are outliers with substantial rates of delivery in particular years at West of Horsham (West) and East of Billingshurst. Build out rates may have been suppressed somewhat in recent years my weakening market conditions.

Sites with Planning Consent

Land North of Horsham

3.16 Land north of Horsham was granted outline planning permission for development in 2015 (DC/16/1677) for mixed use strategic development including up to 2,750 homes, a business park and associated infrastructure following its allocation in the Horsham District Planning Framework 2015. The outline application remains extant. The site is being brought forwards by Legal & General who are acting as a master developer and delivering infrastructure and creating serviced parcels for development. L&G own and control the majority of the site, with two other parties holding sub-phases – Devine Homes (Sub Phase 1E) and Clarion (Sub Phase 2B).

3.17 To 31st December 2025, 258 dwellings have been completed and occupied and there are therefore 2,492 dwellings remaining to be delivered under the outline consent. The Bohunt all-through school has been delivered and is operational. With significant upfront infrastructure now in place, and restrictions associated with water neutrality no more, there is clear potential for delivery on this site to accelerate.

3.18 A PPA has been in place to support the planning process since 2020. Outstanding RMA applications for Phase 1, which is for areas 3 and 8; and all RMAs for Phase 2 are expected to be submitted by 1st March 2027; and for Phase 3 to follow by 2030.

3.19 It is envisaged that all infrastructure for Phase 2 will be delivered by 2029 and that at least 4 housebuilders will be operating across the site at any time from this point. Infrastructure delivery to date includes off-site highways works, improvements the Rusper Road roundabout, the foot and cycle bridge over the A264 and service upgrades which have the potential to support upwards of 3,500 homes.

3.20 The master developer is promoting the potential development of additional parcels which, if allocated, would deliver additional growth. The table below shows their anticipated delivery trajectory for the site which incorporates this and intensification within the existing allocation taking the total delivery above the currently committed capacity for 2,750 dwellings.

Table 3.3: North Horsham – Developer-advised Delivery Programme

	Market	Affordable	Total
To 2024/25	175	24	199
2025/26	68	0	68
2026/27	142	58	200
2027/28	345	71	416
2028/29	324	66	390
2029/30	267	19	286
2030/31	281	66	347
2031/32	222	61	283
2032/33	209	70	279
2033/34	214	71	285
2034/35	229	76	305
2035/36	210	70	280
2036/37	157	68	225
2037/38	56	24	80
2038/39	28	12	40
Total	2,927	756	3,683

3.21 We understand however that the Council is considering delivery of an additional 500 homes through intensification of the site and the allocation of a further plot for 60 homes, which would result in a total capacity for 3,310 dwellings.

3.22 We would envisage that delivery rates of 150-250 dpa on this site could be reasonable. There is the potential for this site to capture pent up demand in the short-term prior in advance of other strategic sites coming on stream; albeit this could be tempered somewhat by market circumstances. Over the plan period to 2040, this site could therefore deliver around 3,000 dwellings.

Horsham Golf & Fitness

3.23 The Horsham Golf and Fitness site is located at Horsham Golf Club, Worthing Road. Outline planning permission was allowed at appeal in 2025[6] for a mixed-use Sports and Leisure Hub and up to 800 dwellings, with all matters reserved save for access.

3.24 The applicant, Generator Group, provided a delivery pro-forma response in February 2026 noting they are actively progressing design and technical work to support reserved matters applications, although delays were caused by challenges brought against the appeal design (the High Court refused permission for challenge to the appeal from Horsham Council in October 2025).

3.25 A reserved matters applications is currently targeted for submission in Q1 2027. The applicant then expects first completions to follow in 2028/29, although a detailed phasing plan is still under development and is intended to be submitted with the reserved matters application. The applicant expects 130 homes to be completed in 2028/29 and 2029/30, and then 135 homes in each year from 2030/31 until 2033/34.

3.26 The applicant intends to adopt a master developer role, with development delivered through multiple housebuilders. However, no delivery partners have yet been appointed. Limited information has been provided about infrastructure requirements or how these may impact upon delivery rates and phasing.

3.27 While the proposed timeframes for submission and development are credible, there remains limited information about infrastructure phasing and how this may impact on site delivery. Given this, and the lack of concrete evidence of progress on the application (notwithstanding the applicant's proforma response), it is reasonable to be more conservative in the housing trajectory. As such, we

[6] APP/Z3825/W/24/3355546

would expect that first completions could be achieved in 2030/31, with delivery ramping up to around 120 homes per annum delivered across two outlets. This would see the site completing in 2038/39.

Assessment of Strategic Site Options

3.28 Our analysis now works through each of the sites in turn below. The site assessments are structured so that those included as allocations in the Regulation 19 Pre-Submission Local Plan are considered first with potential further strategic sites options considered second.

West of Ifield

3.29 The strategic site at the West of Ifield is located on the western boundary of Crawley Borough. It is being promoted by Homes England for 3,000 homes on 194 ha of land. Extending beyond the plan period, Homes England consider that there is potential for up to 10,000 homes to be delivered across a wider area as a new 'garden community.' The scheme would essentially function as a series of new neighbourhoods to Crawley which Homes England describe as a 'West of Crawley Opportunity Area.' However, this is not actively being promoted at the time of writing by Homes England.

3.30 We understand that 97% of the total site area relating to the West of Ifield is owned by Homes England. Homes England has an option to acquire all other land required to deliver the project, including from two additional landowners.

3.31 A hybrid planning application for the development was submitted to Council on 13th August 2025, validated on 29th August 2025 and is under consideration at the time of writing (DC/25/1312). This application seeks detailed permission for early infrastructure needed to unlock the site, including a middle section of the Western Crawley Multi-Model Corridor highlighted as required by Council's IDP. The outline element includes the residential development, commercial uses, supporting social and recreational infrastructure, utilities etc.

3.32 As of April 2026, Homes England reported that they were working with Council to progress the planning application to Committee. Work had started on drafting of a s106 agreement, as well as detailed design work on roads. Assuming that a planning resolution can be secured around Autumn 2026, Homes England expects to start procuring residential development partners in 2027.

3.33 Homes England has a Land Assembly Fund which enables it to invest in early infrastructure to overcome barriers and reduce risk. Essentially, the delivery of upfront infrastructure to enable (and accelerate) development is part of Homes England's role. Homes England has confirmed that it has secured HM Treasury business case approval for the early delivery of enabling infrastructure at West of Ifield. This increases confidence that the upfront infrastructure package can be funded and progressed to support delivery of the site at pace.

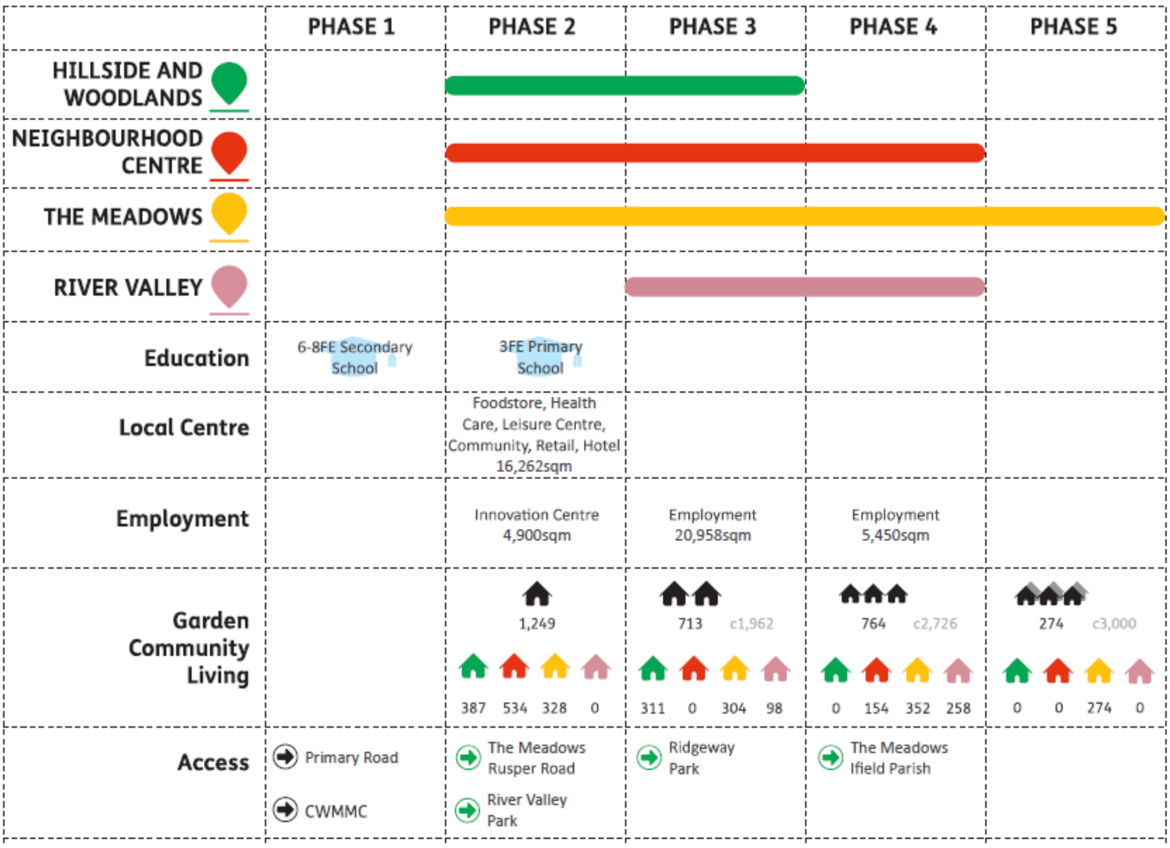
3.34 Homes England has submitted an Infrastructure Delivery Plan as part of the application which envisages 5 phases of development, as set out below. This envisages delivery of the vast majority of the site in the plan period.

Table 3.4: West of Ifield – Delivery Rates & Infrastructure advised by Homes England

Phase	Years	Homes	Infrastructure
1	2027-29	0	Middle section' of Crawley Western Multi-Modal Corridor delivered Water Treatment Works Pumping Station 6/8 FE Secondary School
2	2029-36	1,249	Primary School Neighbourhood Centre
3	2033-38	713	Sports hub Employment development
4	2036-41	764	Employment development
5	2040-41	274	Sports pitches
Total		3,000	

Source: Infrastructure Delivery Plan

Figure 3.1: West of Ifield Phasing



3.35 The Viability Study notes that there is no minimum land payment associated with the site and are satisfied that the residual value reflects an appropriate uplift upon agricultural land values. Homes England has confirmed to Iceni that there are no concerns around viability and the delivery of infrastructure.

3.36 As the Council's IDP sets out, Thames Water has highlighted that reinforcements of the water supply network will be required to support the proposed development. The Council's IDP also notes that local upgrades and strategic network and sewage treatment works upgrades could be necessary. Homes England reports that they are in discussions with Thames Water, but that upgrades are not required as part of the development.

3.37 There are also strategic constraints around aircraft noise in this part of the District. Homes England have confirmed that the site is restricted on how housing provision can be accommodated as a result of the necessary safeguards required in relation to potential future noise impacts from Gatwick Airport. The necessary noise 'contour' of 60dB LAeq, 16hr restricts the potential for development on the northern part of the site. Homes England have addressed these issues through the emerging masterplanning process; with noise contours being restricted to the northern part of the site. This is not envisaged to impact on the scale/ pace of development which could be achieved over the plan period. There is clear potential for the site to accommodate 3,000 homes without breaching the 60dB LAeq, 16hr noise contours.

3.38 Homes England has provided examples from other strategic sites to demonstrate how quickly they are able to commence on site in comparison to other developers. This includes sites at Burgess Hill, Mid Sussex and Rushcliffe, Nottinghamshire which are of a comparable size to West of Ifield. The timescales referenced by Homes England relate to acquisition to a start on site, and are as follows:

- Burgess Hill, Mid Sussex – 3,500 homes: 24 months
- Rushcliffe, Nottinghamshire – 3,000 homes: 21 months

3.39 In recent years, Homes England accept that delivery at Burgess Hill been slower than anticipated; however, this has largely been associated with infrastructure delivery. There are however now four outlets operating with two developers on board and a third developer in discussion and therefore delivery rates should begin to pick up pace looking forwards.

3.40 A further recent example is Northstowe, where Homes England has seen recent delivery rates of over 200 dpa. Homes England indicate that they have taken control of the remaining land in the scheme and are undertaking a package of intervention aiming to accelerate delivery to between 300 and 550 homes per annum, with this rate of delivery accepted by the Greater Cambridge Planning Partnership in their housing trajectory.

towe, Cambridgeshire (Phase 2) – 10,000 homes

- January 2017: S106 signed and outline approval
- July 2017: Strategic Infrastructure Works Contract let
- January 2018: Strategic Infrastructure RM application submitted and approved
- September 2019: Phase 2 RM application submitted
- June 2020: Phase 2 – start on site
- 2020-present: 1600 homes occupied at a rate of c.200-250dpa
- 2026 onwards: Increased projected delivery to 400+ dpa

3.41 A Planning Performance Agreement is in place between Homes England, Horsham District Council, Crawley Borough Council and West Sussex County Council. The detailed timings for delivery of infrastructure up to the first residential occupations is below.

3.42 Homes England has provided a timetable, as set out below. However we understand that the outline application submission is unlikely before September 2026, which would therefore imply a start on site in Winter 2027, with the upfront delivery of site infrastructure and the secondary school. They envisaged that construction of the first homes will commence in early 2029 facilitating the first completions in late 2029 (in the 2029/30 monitoring year). With the delay to the outline, there is potential for this to slip into 2030/31.

Table 3.5: Homes England's Timetable for Planning and Upfront Infrastructure

Milestone	Timing
Submission of hybrid Planning Application	August 2025
Resolution to grant Planning Permission	April 2026
Obtain Planning Permission	July 2026
Technical approval for enabling infrastructure	September 2026
Appointment of Enabling Infrastructure Works Contractor	February 2027
Site mobilisation	May 2027
Enabling infrastructure start on site	September 2027
Secondary School construction	Mid 2028
Appointment of first housing Development Partner	Mid 2028
Secondary School opening	September 2029
Housing Start on Site	Early 2029
Completion of Enabling Infrastructure Works	Spring 2029
First housing occupation	End 2029
Final occupation (up to 3,000 homes)	2041

Source: Homes England

3.43 Based on Homes England's track record in other areas, first completions in 2030/31 following the provision of upfront infrastructure is considered reasonable – particularly as the infrastructure is being secured under the detailed element of the application.

3.44 The Housing Trajectory provided by Homes England shows annual completions rising from 100 homes in the first full year (2030/31) increasing to peak delivery of 300 homes per annum which is sustained between 2023/34 to 2038/39. Final completions are then envisaged in 2041/42. Homes England's justification for these notably high delivery rates is that it is able to draw on expertise within its Land, Investment, Legal and Places Directorates to devise and test innovative delivery models and financing options that will support the accelerated delivery of large settlements. It will retain control over the development and act as a master developer.

3.45 Homes England's role in sites such as this is focused on supporting delivery at pace. It adopts a range of mechanisms to accelerate delivery including:

(1) Diversification, providing support for smaller builders and new entrants to create a more diverse, resilient and competitive market. Diversification is also being encouraged through

providing access to land; short-term development finance; tenure diversity; and a scheme which provides multiple outlets;

(2) The use of modern methods of construction (MMC) which Homes England is rolling out on other sites across the country. The use of MMC forms part of the Agency's objectives to support construction sector productivity, with Homes England indicating that it will manage a minimum MMC requirement from bidding developers and score proposals based on their use of it;

(3) Simplifying procurement - Homes England's Dynamic Purchasing System framework has 70 national and regional housebuilders and contractors and offers public sector organisations a streamlined procurement route to appoint a developer; and

(4) Increasing the pace of delivery – Homes England are able to use its Building Lease arrangements to ensure that development partners deliver at pace at a rate above what could be expected through the market alone. The current contract data from Homes England sites shows that sites are contracted to deliver 115% to 150% of the market rate.

3.46 It is Iceni's view that the site is essentially an urban extension to Crawley, which is one of the larger towns in the region, a key economic node (with an expanding airport) and one which is under-bounded (resulting in unmet need). The site is highly accessible to key employment locations including Manor Royal, Gatwick Airport and Crawley Town Centre. The intended early delivery of infrastructure, including both the muti-modal corridor and secondary school should help to support the pace of delivery (including through enabling the opening up of a range of development parcels). Crawley's affordability position (which is better than in other locations in Sussex) combined with the 40% affordable housing provision envisaged should also help to support the pace of absorption of homes.

3.47 Homes England have indicated to Iceni that there would be a minimum of around 5-6 outlets on site; however, it would look to maximise the number of outlets as part of their market diversification objectives. Through diversification of housing types, including (for example) open market, affordable housing, later living, build to rent, self/custom build and SME involvement, this will enable multiple outlets and delivery partners to be on site at the same time. The site can thus support delivery for a range of market segments.

3.48 The phasing of the site is being brought forward to allow this, by providing opportunities for different house types to be brought forward in different parts of the site at the same time in different character areas. The phasing of the delivery of this site would also see it come forward as delivery at Kilnwood Vale is wound down.

3.49 The latest illustrative masterplan shows that there will be a range of mixed tenure homes including market homes, social rented homes, shared ownership homes; as well as older persons accommodation, self and custom build plots and high density Build to Rent housing. The expectation is that the 5-6 outlets would be operating concurrently across the site delivering these varied products and tenures. This significant product diversity, with the potential involvement of a range of housebuilders, will help to support the built rate.

3.50 Taking all of this together, and recognising that over 300 homes per annum have been delivered on sites including Kilnwood Vale and West of Horsham in the last 10 years, we agree that a peak build-out rate of 300 dpa could be achieved on this site.

3.51 Homes England's trajectory envisages c. 2,675 homes delivered over the plan period. With a slightly more gradual build-up of completions over time, we consider that a reasonable assessment would be for around 2,500 homes over the plan period to March 2040.

Land West of Southwater

3.52 The strategic site located to the west of the village of Southwater comprises 140 ha of land and is being promoted by Berkeley Strategic for 1,000 homes with the plan period. The land is currently owned by The Fletcher Trust & Christ's Hospital School; and a Promotion Agreement is in place with both landowners. Berkeley has confirmed that contracts are in place over the whole site.

3.53 An outline planning application was submitted for the site in October 2022 for up to 1,500 homes; however, this was withdrawn in February 2023. A revised outline application was submitted to the Council on 27th February 2026 and validated on 3rd March 2026 (DC/26/0366). There is a Planning Performance Agreement in place which envisages that the application will be determined at Committee in Q3 2026.

3.54 In respect of infrastructure requirements, the Council's IDP recognises issues at the A24 Hop Oast roundabout at Southwater which, according to the County Council, would require signals or a 'cut through' roundabout. The 2024 Horsham Transport Study states that signalising the roundabout would mitigate any impacts and the proposed development therefore includes the full signalisation of the junction – the delivery of which will be led by Berkeley. The IDP calculates an indicative cost of around £3.1m and notes the funding sources at S106 contributions, County Council and Government funding.

3.55 The draft Policy expects full signalisation of the Hop Oast roundabout, plus further improvements to junctions on the A24. It requires construction of a link road between the development and the Hop Oast roundabout. Berkeley report that a highways strategy has been largely agreed with the County.

Berkeley also set out that the upgrades are not likely to be required at commencement, as there is capacity for around 200 homes before the junction works are undertaken.

3.56 The Council's IDP sets out that that the site is likely to require gas network reinforcements to increase in the capacity in the system. SGN has indicated these works would be completed within 2 years. It is expected that up to 400 dwellings (i.e. initial phases of development) would be able to connect before reinforcement is required; and the IDP notes that it is possible that reinforcement could be avoided, potentially reducing costs significantly. However, Berkeley Strategic have indicated to Iceni that no gas boilers will be used in the revised scheme – heat pumps will be used instead, so there should be no significant impact.

3.57 The IDP states that Southern Water has set out that wastewater capacity upgrades are required for the site and these upgrades will come forward through the service provider's Asset Management Plan 7 which covers the period 2020-2025 (and is therefore planned growth) and will be funded through Southern Water's Business Plan. At the time of writing, Berkley Strategic have had confirmation from Southern Water that there is capacity in the wastewater network for the development. In future, there is a need for wastewater network and clean water network reinforcements which will be funded by the developer via the New Infrastructure Charge levied by Southern Water at £790 per property.

3.58 The submitted planning application includes land for a new secondary school, land for a primary school and nursery, a neighbourhood centre and highways works.

3.59 Overall, there are no evident showstopping constraints based on the available information. The Council's Viability Study has found that the development is viable, taking into consideration this necessary on- and off-site infrastructure and the provision of 35% affordable housing as well as education and community uses. This level of affordable housing is provided for in the planning application.

3.60 A masterplan and phasing strategy for the site have been developed. The promoter has set out the following timescales to HDC regarding the site's delivery:

- Outline planning application submitted: Q1 2026
- Outline planning application determined at Committee: Q3 2026
- Submission of 1st RM application: Q2 2027
- Approval of 1st RM application: Q4 2027
- Pre-Commencement Conditions discharged: Q1 2028
- Commencement on Site: Q2 2028

- Start on site: Q2 2028
- First Completions: Q4 2029

3.61 This is a relatively compressed post-committee program and would depend on the timely completion of the s106 agreement, the reserved matters process and the discharge of pre-commencement conditions (although Berkeley considers the program as realistic). The PPA supports the realism of the timescales.

3.62 The intention is that the adjacent Broadacres development will be largely built out before houses begin to be delivered at Land West of Southwater, although there may be some degree of overlap between the two schemes. Berkeley indicate that 100 homes per annum could be achieved over a number of years with all homes built out by 2040/41.

3.63 Berkeley Strategic are currently delivering homes at the Broadacres development which lies adjacent to the West of Southwater site. Prior to development being paused as a result of water neutrality issues, sales at this site averaged out at around 1 per week. Apart from 2024/25, this site delivered has an average of 51 homes per annum. However, this was based on delivery by Berkeley alone.

3.64 Berkeley Strategic are also delivering at the West of Horsham (Highwood) site where 62 homes per annum has been achieved on average, which is supported by our analysis of the existing strategic sites upfront in this section. The build-out rate on this site rises to 76 pa for the peak period from 2014-22. Berkeley Strategic note that market conditions have worsened over recent years and that peak delivery achieved at Broadacres and Highwood was 91 homes and 172 homes respectively. The Highwood scheme included 20% affordable housing, and therefore for a comparable market build out rate, with 35% affordable housing (as proposed for Land West of Southwater), would achieve 82 dpa.

3.65 Through discussion with Berkeley Strategic we also understand that a number of different development models are being considered, including Berkeley developing the site (as has occurred with Highwood and Broadacres); disposal of the site or parcels within it; or Berkeley taking on a master developer role. The residential land could potentially be divided into three broad parcels of around 300-400 homes, broadly comprising northern, central and southern components. The southern parcel would be proximate to the existing Broadacres scheme, and so development could easily dovetail between the two. Some involvement of wider partners seems most likely.

3.66 Berkeley's submitted trajectory shows first completions in 2029/30, with a build up from 40 homes completed in the first year to 100 per year from 2032/33 onwards before tailing off during the final phase.

3.67 Berkeley's existing Southwater scheme is due to be largely built around 2029/30 and a result, the transition across to this site would be relatively straightforward. Having regard to the more likely delivery options, Iceni consider a build out rate of 100 homes per annum to be reasonable. It is clear from a review of the evidence base that there is unlikely to be any significant delays resulting from strategic infrastructure provision based on the current evidence.

3.68 Berkeley's trajectory envisages first completions in 2029/30 with delivery of 950 homes in the plan period. With the now expected involvement of other developers in the site, we consider this is reasonable.

East of Billingshurst

3.69 This strategic site located to the east of Billingshurst. Billingshurst in located 10km south west of Horsham. It is a greenfield site of 90 ha. The main part of the site is being promoted by Bellway Homes and Crest Nicholson through a Joint Development Agreement with proposals for c. 650 homes within the plan period. Bellway own some land on the site on a freehold basis with an option agreement for the remainder; whilst Crest have an option agreement on the land they control.

3.70 In addition, there is a further land parcel in the north of the site with potential for c. 50 homes which includes land parcels controlled by Devine, Persimmon and Bellway. The site allocation in the Regulation 19 Plan was for a minimum of 650 homes; but with the inclusion of additional land to the south of the railway line, the Council is now considering the potential for 1,000 homes

3.71 In respect of infrastructure requirements, the Council's IDP outlines a need for bus service improvements from the site to Horsham, a new bridleway link to the railway station and improvements to the A29 Northern roundabout, as identified in the 2024 Horsham Transport Study. The IDP also sets out that a 2FE Primary School is required in the first phase of development owing to the absence of local school capacity. There is ongoing liaison with WSCC on this but we understand with the enhanced scale, a minimum of 2FE is required as well as SEND and early years' provision. The main promoters indicate that most infrastructure improvements can be provided on-site or through a s278 agreement with WSCC to support off-site highway works. To facilitate the development, a new access route and associated roundabout off the A272 is required at the SE of the site, as well as secondary vehicle access off the existing A272 at East Street/ Amblehurst Green. There is potential mitigation required to other junctions.

3.72 The main promoters (Bellway and Crest Nicholson) have set out an indicative overview of infrastructure phasing for the land they control which will see site enabling works, including access from the A272 in the southern part of the site, undertaken in 2028 to enable a serviced plot for the primary school as part of the first phase of development. The link to the northern A272 access would be provided later in the development.

3.73 Upgrades to the Billinghurst Waste Water Treatment Works are scheduled within Southern Water's Business Plan for the 2025-30 AMP period. Investment is funded by a New Infrastructure Charge levied by Southern Water. The IDP also makes clear that there are potential capacity issues in the electricity network in the west of the District around the Billingshurst area. However, SSEN has indicated the first stage of reinforcement to support new development would be a new interconnector to a primary substation in Five Oaks and should not result in significant delays for initial phases of residential development in this part of the District.

3.74 There is potential that a pedestrian bridge could be required over the railway line at the southern end of the site to support development. The site promoters have indicated that negotiations with Network Rail started on this and were progressed alongside the Local Plan in 2023 and have confirmed the technical feasibility of this; with Network Rail supportive in principle as the bridge would replace the existing at grade crossing with associated safety improvements. There is potential for negotiations on this to impact on planning timeframes; but financial contribution to this is factored into the Plan's viability analysis.

3.75 We have received only information related to the delivery of the land controlled by Bellway and Crest Nicholson who are working with a single planning agent. Through information submitted by these promoters, we understand that a Planning Performance Agreement is in place, and subject to the progress with the Local Plan Examination, a planning application could be submitted in Winter 2026. Consultant team appointments are underway to support this. At present, the developers envisage the following application timetable:

- Submission of a Hybrid Planning Application: Q4 2026
- Determination: Q2 2027
- RM application submission: Q3 2027
- Pre-Commencement Conditions Discharged: Q4 2027
- Start on Site: early 2028

3.76 The expectation is that the initial planning application would be hybrid and include application for detailed consent for access and initial (Bellway) residential development. This would facilitate early delivery of infrastructure and access to development parcels. The Crest component would be in outline.

3.77 The developers envisage that the above timetable could see initial completions in late 2028/ early 2029. They envisage a c. 4 ¼ year build out of the land they control, with the site completing in 2032/33, with an average build out rate of 156 dpa. Whilst this is potentially feasible there are also some possible factors related to infrastructure negotiations/ S106 which would cause delay.

3.78 In respect of the build out rate, the site promoters are national housebuilders and Iceni also note the rate of delivery immediately to the north of the site – which has achieved peak delivery in 2020/21 of 220 homes. Bellway have also informed Iceni that they have undertaken market testing and there is pent up demand associated with the water neutrality slowdown. The Table below provides a breakdown of forecast completions by the two developers. The policy requirement here is for 35% affordable housing.

Table 3.6: East of Billingshurst: Developer-advised Delivery Programme for Crest and Bellway Parcels

Year	Crest	Bellway	Total
			-
2028/29		25	25
2029/30	75	75	150
2030/31	75	75	150
2031/32	100	75	175
2032/33	75	75	150
Total	325	325	650

Source: Savills, 2026

3.79 The wider component of the site to the south of the railway line is controlled by Richborough, a land promoter. This is more likely to come forwards in the medium-term.

3.80 Reviewing the planning application timetable suggested by the developer, Iceni consider that first completions on this strategic site in 2029/30 or 2030/31 is more realistic to allow for the submission and subsequent adoption of the Local Plan, determination of the application, reserved matters consent and enabling infrastructure to be delivered. We consider that more cautious build-out rate assumptions should be adopted taking account of delivery at Adversane, if this is taken forwards, with the potential delivery on this site in that scenario peaking at 120 dpa. Nevertheless the is a strong prospect that the full 1,000 homes could be delivered within the plan period.

Land at Buck Barn, West Grinstead

3.81 The strategic site, situated at West Grinstead, comprises 165 ha of developable land and is being promoted by Thakeham Homes for 3,300 homes. Thakeham control all of the land being promoted in the form of Option agreements with the landowners.

3.82 In respect of infrastructure requirements, the Council’s latest IDP is clear that the A24/A272 Buck Barn Junction will require physical mitigation, as identified in the Council’s 2024 Transport Study. To facilitate the development, major infrastructure highway works would be required including the conversion of the A24/A272 junction to a ‘through-about’ roundabout. Two new highway junctions would be provided, with the main access on the A24 and a secondary access at the A24/A272 junction. The promotor has confirmed that early highway infrastructure work would be forward funded by the business and that no external funding would be required.

3.83 The Council's Viability Study has found the proposed development to be viable, taking these infrastructure requirements as well as the provision of 35% affordable housing and a range of education-related provision including three new schools, care and community infrastructure into consideration. The promoter has confirmed that it is continuing to plan on the basis of 35% affordable housing and has not identified any viability concerns.

3.84 The Council's IDP sets out that there is currently no gas infrastructure in the area surrounding Cowfold which includes the site. SGN has indicated that there is therefore a need for gas network upgrades which are expected to take around 3 years to programme and complete. However, the promoter has stated that in order to achieve higher sustainability targets, they will not be installing gas infrastructure but instead all properties will be electric heated using energy efficient techniques such as photovoltaic panels, and air / ground source heat pumps which can all be combined with improved thermal properties to the fabric of the building.

3.85 The developer carried out early consultation with the statutory electricity provider, UKPN, to determine how best to supply electricity to the development. Thakeham have now undertaken the required searches and confirmed that there is sufficient capacity within the network to facilitate initial delivery, with the wider electrical supply strategy proved viable with UKPN and necessary onsite infrastructure accommodated within proposals.

3.86 Southern Water has advised that the site is not within or immediately adjacent to an existing Southern Water Wastewater Treatment Works catchment. As such, the scheme would deliver an on-site water/sewerage treatment works. The promoter confirmed through discussion that foul drainage remains the principal utilities matter being worked through, with two options under consideration: connection to a point further away or provision of on-site wastewater treatment infrastructure. A phased solution is being considered.

3.87 Furthermore, there is a need for water supply network reinforcements. The promoter has set out that supply will come via new mains, installed from the nearest point of connection to the existing Southern Water supply mains, where capacity exists. All reinforcement works will be funded by the developer by way of a New Infrastructure Charge levied by Southern Water. The promoter confirmed in May 2026 that it does not see access to water supply as a particular issue.

3.88 There have been several iterations of master planning and technical work completed on the site. Pre-application discussions had taken place historically but were interrupted by water neutrality issues. Work has now resumed, with a pre-application meeting held with Council on 7th April 2026 and further meetings scheduled, including with the County Council on highways. As a result of historical discussions, the promoter notes that key technical principles have been worked through, with current engagement focusing largely on detailed design matters.

3.89 The developer has indicated the potential to submit an outline planning application with access in detail. The current programme targets submission for December 2026 – January 2027. The submitted development programme identifies the following milestones:

- PPA / pre-application discussions: April 2026 to December 2026
- Outline planning application submission: December 2026
- Reserved matters for Phase 1: December 2027
- Reserved matters for infrastructure: December 2027
- Outline planning application determination: August 2027
- Infrastructure reserved matters determination: April 2028
- Phase 1 reserved matters determination: May 2028
- Outline pre-commencement conditions discharged: June 2028
- Phase 1 reserved matters pre-commencement conditions discharged: October 2028
- Start on site: November 2028

3.90 The developer anticipates first completions in 2029/30, with delivery rising rapidly to 300 homes per annum from 2031/32 onwards and the full 3,300 homes delivered by 2040/41. The development is proposed to be delivered by Thakeham in both master developer and housebuilder roles. Thakeham intend to deliver service infrastructure and build homes under its own brand and potentially another brand within the business. In addition, serviced parcels would be disposed of to other housebuilders, with submitted material envisaging up to three other housebuilders operating on site concurrently.

3.91 The A24/A272 junction is proposed to be delivered first and to provide site access in the early phases of development. A new northern access junction and spine road will be provided later and become the primary route, after which access from the A24/A272 junction will be for emergency vehicles only. Given the time likely to be required for the A24/A272 junction to be delivered, temporary access points for construction and sales access to the site are also being considered. This should allow development and sales to commence in advance of junction delivery.

3.92 In support of the proposed build out rate of 300 homes per annum, Thakeham also noted that this will be supported a diverse tenure mix likely including single family Build-to-Rent homes, retirement housing and a care home, with up to four outlets and 35% affordable housing.

3.93 There are some risks to delivery at this pace (300 homes per annum), not least as whilst Modern Methods of Construction may support a shorter period of construction, consideration does also need to be given to the pace of sales. We note that this has been achieved at Pease Pottage but consider that there is greater potential for this build-out-rate to be achieved around Crawley reflecting the size and strength of its economy.

3.94 Iceni therefore consider that a more cautious assessment of the build-out rate would be appropriate with peak delivery of 200 homes per annum building up from 50 homes in the first year to 100 homes to 150 homes to peak delivery with total delivery in the plan period to 2040 of 1,650 homes. Iceni has assumed a longer lead-in time, with first completions in 2031/32, to be more realistic to allow for time to deliver the necessary enabling infrastructure. The strategic infrastructure which is necessary to support development (and associated upfront costs), means that there is a need for development to come forward at pace to support the scheme viability.

Land at Adversane (Kingswood)

3.95 The strategic site at Adversane is located at and surrounding Steepwood Farm. It comprises around 150 ha of land and is being promoted by Our Place for 3,200 homes, around 2,000 of which they indicate would be provided within the plan period to 2040. The site is part owned by Kingswood Village Developments, Eton College and Chichester College, with legal agreements in place in favour of Kingswood Village Developments.

3.96 As part of the development, a range of major infrastructure provision is required, including the delivery of a B2133 Priority Junction, construction of a bridge over the Arun Valley railway line to facilitate the closure of the high-risk level-crossing on the B2133 and the construction of a new roundabout of the A29 to provide access to the bridge. There are also several off-site junction improvements proposed including improvements around the A29/ A283 mini roundabouts at Pullborough.

3.97 The promoter has informed Iceni that there is a Memorandum of Understanding with Network Rail to progress the railway bridge, with an Asset Protection Agreement being finalised to underpin design and delivery responsibilities. A preferred option has been selected design work for the bridge is at an advanced staged including agreement on parameters from the County Council. The bridge is estimated to cost around £15 million, with the developer prepared to self-fund this work if necessary while also exploring grant options to support delivery.

3.98 In respect of the B2133 Priority Junction, the promoter has indicated that this will be delivered as part of the first phase and will provide access for the 300 homes to be delivered prior to the bridge trigger.

3.99 Land is being safeguarded for a potential new railway stations station and discussions have taken place between the promoter and with Network Rail and Govia Thameslink. Network Rail has confirmed that the safeguarded land could work technically, and the promoter considers that a station could be delivered in the longer term (within up to 10 years from start on site, midway through the masterplan build out). However, the promoter noted that the transport strategy and sustainability case do not depend on the station being delivered.

3.100 Education provision will be required on site. At the time the interview was held, the promoter has advised that based on discussions with the County Council, there is need for a three-form-entry primary school and four to six forms of entry of secondary education. The promoter indicated that the masterplan can accommodate this provision and, if justified by evidence at the relevant stage, could accommodate a larger secondary school and potentially a second primary school. We understand that the latest position is that at two primary schools are required: a 2FE school with potential for expansion to 3FE; and an additional 1FE school with potential to expand to 2FE. Furthermore at secondary level, a 6FE school is required with potential for expansion to 8FE, together with post-16 provision.

3.101 In respect of gas provision, the Council's IDP states that there is currently no gas infrastructure in the area. However, the promoter has set out that no mains gas is planned for the development given the site's net carbon zero strategy – the promoter has committed to avoiding gas mains to housing.

3.102 The Council's 2024 IDP also makes clear however that there are potential capacity issues in the electricity network in the west of the District around the Billingshurst/Adversane area. SSEN has indicated the first stage of reinforcement to support new development would be a new interconnector to a primary substation in Five Oaks and should not result in significant delays to the level of residential development proposed in the Local Plan in this part of the District. Any additional commercial or industrial requirements in the area may limit the scope for development under this level of reinforcement. The next stage of reinforcement would involve upgrading the Billingshurst or Five Oaks primaries, which would be a major capital scheme and would take several years to complete. Upgrade works at this level would require further feasibility work to be undertaken in order to determine exact requirements and indicative costs. The promoter has indicated that Phases 1 and 2 could come forward from existing substations (and a power quotation from the District Network Operator has been secured to do so); however, the promoter has recognised that for future phases, upgrade/reinforcement of the 33kV network and new 33KV Primary circuit-breaker will be required. At the time of writing, the associated timescales for these works remain uncertain.

3.103 The Council's IDP is also clear that water supply upgrades will also be needed to support development in future. If growth at Adversane was to occur alongside the development at East of Billingshurst, this would have the potential to double the current Billingshurst WTW catchment size over the next 15-20 years requiring additional investment. This would be picked up through Southern Water's Asset Management Plan, either in the next Business Plan period (2025-30) or in the subsequent period (2030-35) and would not prohibit development on this site; however, clearly this would have implications for the lead-in time and build out of this site.

3.104 The promoter has informed Iceni that the existing 300mm potable water main that traverses the site has sufficient capacity to serve an initial phase of 1,335 proposed residential units. There may be a need for around 700m of off-site water main upgrade from the Upper Nash Nutbourne Reservoir to the site, but the promoter considers this to be viable and not be a concern for early delivery. Formal modelling would only be undertaken once planning is further advanced.

3.105 The promoter has also advised that the existing flour water infrastructure has limitations. The current approach is to secure an early connection into the existing system, while working with the water authority on a longer-term solution through its capital plan, with self-funded early infrastructure if necessary. Infrastructure levy payments per unit have been built into the cost model.

3.106 Iceni understands that pre-application meetings have been held with HDC in Dec 2025 and Jan 2026 and that the promoters are targeting submission of a hybrid planning application in October 2026. The hybrid application would seek detailed planning consent for enabling infrastructure and 200-300 homes; and outline consent for the remainder of the site. It would provision for approx. 2,900 – 3,000 homes. Four broad phases of development are envisaged.

3.107 The promoter has provided a detailed programme of works relating to key infrastructure. This includes the following:

- 2028-30: Delivery of site access junction and enabling works and connections for electricity, clean and foul water.
- 2029-31: Delivery of A29 roundabout and access to bridge, bridge across railway line, level crossing removal, local junction improvements as delivery of the Primary School, community hall and health centre.
- 2031-early 2033: Off-site junction improvements and cycle-ways, new sub-station and upgrade works to electricity, clean water and foul water networks
- 2034-early 2035: Secondary school and waste water treatment works
- 2036-2038: Second primary school and further electricity, clean and foul water works

3.108 In respect of delivery, Our Place are acting as master-developer and will manage the delivery of the development and work in partnership with selected developers to build-out serviced parcels. Their proposals include Build to Rent, self-build and retirement living, as well the provision for employment space. These will help to support the delivery rate. A Masterplan has been developed and has informed a detailed phasing programme across five phases of development.

3.109 The promoter intends to submit a hybrid planning application to align with the adoption of the Local Plan. Our Place has entered into a PPA with the Council and, if the site is allocated, expects:

- Submission of hybrid planning application: October 2026
- Determination: Spring/ Summer 2027
- Discharge of Pre-Commencement Conditions: Summer/Autumn 2027
- Mobilisation: Q4 2027
- Start on Site: Q1 2028
- First Completions: 2029

3.110 Build-out rates are based on the expectation of delivering different housing products – including traditional housing for sale and affordable housing, as well as retirement living and built-to-rent provision. The communal spine infrastructure will support multiple outlets, with Our Place acting as a master developer. Provision for retirement living of c. 150 units is envisaged.

3.111 The promoter also emphasised the role of placemaking, commercial floorspace and employment creation in supporting site build-out. The latest proposals include substantial commercial floorspace, with the promoter suggesting that the scheme could support around 2,500 jobs and act as an economic driver in its own right. The promoters also point to the potential role of Kingswood in helping to meet unmet need arising from the South Coast.

3.112 The promoter's expectations regarding the build out rate are set out in the Table below.

Table 3.7: Adversane: Developer-advised Delivery Programme

	Market	Affordable	Other	Total
2029/30	27	14	0	41
2030/31	54	29	75	158
2031/32	70	38	75	183
2032/33	87	47	0	134
2033/34	114	62	0	176
2034/35	112	61	0	173
2035/36	119	64	0	183
2036/37	144	77	0	221
2037/38	143	77	0	220
2038/39	155	83	0	238
2039/40	155	83	0	238
2040/41	155	83	0	238
2041/42	141	76	0	217
2042/43	141	76	0	217
2043/44	133	71	0	204
2044/45	133	71	0	204
2045+	101	51	0	155
Total	1984	1063	150	3200

3.113 We understand that a partnership with Places for People has been established to deliver the first phase of development; with the expectation that longer-term they will deliver a number of phases on site. Overall it is envisaged that 3-4 housebuilders will deliver concurrently through the majority of construction, with selective contracting with retirement living and other specialists to deliver specific forms of development.

3.114 Iceni consider that, on the basis of the submissions from the site promoters, initial completions in 2030/31 is more realistic. Should this strategic site and other strategic sites around Billingshurst all come forwards, there would be some potential impact on the build-out-rate – in particular in the 2033-35 period in which peak delivery could overlap. We consider that that this might have some impact on lowering delivery rates from those set out by the promoter above; with the potential for a stronger build-rate to be achieved therefore later in the plan period on this site.

3.115 We conclude potential on a more cautious basis for the site to deliver 1,500 homes to 2040, with initial completions in 2030/31 and building up to achieving 150 dpa from 2033/34 and then 200 dpa from 2036/37 as competition from other locations lessons. If other strategic site options in the Billinghurst area are not taken forwards, the delivery of this site could however exceed this.

Land at Kingsfold, Warnham (Brookvale Garden Village)

3.116 This strategic site is located east of Kingsfold, approximately 3km north of Horsham. The site was previously proposed for a development of 1,300 homes across five new villages, centred on the existing settlement of Kingsfold and along the A24 with a total site area of 156 ha. However, the promoter is now seeking to deliver up to 2,150 homes in the plan period.

3.117 There are a total of three landowners controlling the site and all land is held under Option Agreement being led by a single promoter. In May 2023, Wain Estates took over promotion of the land and have indicated that they could deliver the homes.

3.118 The development is proposed both east and west of the Sutton and Mole Valley railway line, which divides the site into eastern and western parcels. The promoter has confirmed that access between the two sites is a key constraint and in order to unlock the eastern parcel, a bridge over the railway line is required and is proposed to be provided by the promoter. There is a Memorandum of Understanding in place with Network Rail related to the delivery of the bridge.

3.119 The site masterplan has been revised from earlier versions to reduce the number of proposed railway crossings in order to reduce the infrastructure burden and associated viability risk. Development west of the railway line would come forward first, with the eastern side following once the necessary crossing infrastructure is in place.

3.120 In terms of other transport infrastructure required, the Council's 2020 IDP set out that upgrade works would be required to Warnham Station in order to accommodate additional development. The latest position is that a Business Case was submitted by the promoters to Network Rail detailing the potential for a new railway station in Kingsfold as opposed to upgrade works at Warnham Station. In May 2021, Network Rail set out two preferred ways for the railway to serve Kingsfold within current operational parameters, as follows:

- Option 1: new station at Kingsfold, with Warnham Station to be closed; and
- Option 2: upgrade Warnham Station as a railhead for Kingsfold.

3.121 Iceni understands through discussions with the promoter that these two options remain on the table, but no decisions have been made. The promoter has a memorandum of understanding with Network Rail signed in July 2022, but has confirmed in April 2026 that there has not been substantial further engagement with Network Rail since then. The position is that while Network Rail has acknowledged in principle the potential for a station, the next stage would be an outline business case led by Network Rail, which is only likely to progress if there is greater planning certainty (for example a draft allocation). It is not currently clear how the station would be funded and thus, there are significant risks associated with its delivery; but the promoter considers that the delivery of a new station is not required to support the site's delivery, with the site a 7 minute cycle from Warnham Station and the site able to meet relevant sustainability requirements without the station. If not delivered as part of the promoted development, the station site would be safeguarded.

3.122 The proposed scheme currently includes the delivery of a A24 relief road around the existing settlement of Kingsfold. The promoter has confirmed that the land for the A24 Relief Road is reserved within the first phases of development as is the land required for a new rail station and bridge crossing. The promoter has informed Iceni that the relief road remains an option that is on the table; however, further discussions with the County Council are necessary to determine how, in what form and when this might come forward. They envisage that the road would be delivered alongside rather than in advance of housing to avoid a lag between infrastructure spending and housing sale receipts.

3.123 A 3FE primary school is envisaged to be provided as part of the development. A secondary school has also been included, with the promoter's engagement with the Education Authority posing no major hurdles to agreement.

3.124 The promoters have submitted a range of technical evidence to the Council as part of their site promotion activities, including a Masterplan Document and a range of wider technical evidence including landscape review, heritage and archaeological evidence; noise assessment; technical evidence around transport and the railway. An EIA screening request was submitted to the Council in December 2024.

3.125 The promoters indicate that an outline planning application could be submitted for the site in January 2027. On the basis of the approval of this in early 2028, they envisage that RMA applications for initial phases and discharge of relevant conditions could occur in 2028, to allow a start on site at the end of 2028.

3.126 The delivery programme submitted to HDC from the promoter sets out an indicative infrastructure programme by phase alongside the number of homes to be delivered. This suggests that the Relief Road would be delivered in the first three phases along with the delivery of over 1,000 homes on the western side of the site; however, the promoter has recognised that a trigger could be agreed with the Council. The railway bridge and station crossing would be delivered in Phase 5 and 6 respectively, as set out below.

3.127 The promoter expects first completions on the western side of the site in 2029/30 with a 15-year build programme. The promoter expects completions of around 100 homes in years 1-5 followed by around 160 per year thereafter (rising to 185 dpa at peak).

Table 3.8: Brookvale Garden Village: Developer-advised Delivery Programme

	Market	Affordable	Total
2029/30	65	35	100
2030/31	65	35	100
2031/32	65	35	100
2032/33	65	35	100
2033/34	65	35	100
3034/35	104	56	160
3035/36	104	56	160
2036/37	104	56	160
2037/38	104	56	160
2038/39	104	56	160
2039/40	120	65	185
2040/41	120	65	185
2041/42	104	56	160
2042/43	104	56	160
2043/44	104	56	160
Total	**1397**	**753**	**2150**

Source: Information submitted by CBRE to HDC

Table 3.9: Brookvale Garden Village: Details of Phasing

Phase	Homes	Key Infrastructure
1	345	A24 relief road; E-charge forecourt
2	216	A24 relief road; primary school; care home; local centre; leisure; GP surgery
3	187	A24 relief road; local centre; employment hub
4	121	
5	188	Bridge over railway delivered; business park; innovation community
6	247	New Train Station
7	215	
8	280	
9	345	Local centre

Source: Information submitted by CBRE/TOR to HDC

3.128 The Council's Viability Study has found that the promoter's benchmark land value cannot be met but a reasonable premium is achieved taking into consideration the A24 Relief Road as well as the potential for a new Parkway station along with 35% affordable housing provision and community and education provision. The Viability Study has noted that if the benchmark land value of £150,000 per gross acre represents the minimum payments required for the landowner to release the site for development, there may be a deliverability issue. As a result, based on the Council's evidence base, there are potential viability challenges if all potential major strategic infrastructure needed to support the scheme.

3.129 In response, the promoter has informed Iceni that they have questioned the number of crossings on the flood plain (i.e. the eastern side of the side) required in a viability context. As noted above, the scheme has been redesigned to reduce railway crossings and improve viability. The promoter is confident that the scheme is viable and there is no need to reduce the proposed quantum of affordable housing.

3.130 Southern Water has set out that wastewater capacity upgrades are required for the Site and these upgrades would potentially come forward service provider's Asset Management Plan which spans five year periods. There's also a need for wastewater network reinforcements which would be delivered within 24 months of planning consent. The promoter did not identify utilities as a major concern in the April 2026 meeting, although the detailed position would need to be tested through the planning application. The submitted material includes a water supply position statement and wastewater strategy letter, and states that all infrastructure is anticipated to be developer funded to avoid delays in delivery.

3.131 The promoter has indicated the potential for an element of self/custom-build housing to be delivered on site; and subject to market demand, an element of elderly care / specialist housing as part of a new local centre. It envisages the site will support multiple outlets, together with a policy-compliant 35% affordable housing.

3.132 There appear to remain a number of key unanswered questions as to the delivery of this site, including whether the development would be able to be approved without the railway station (and uncertainties around the station cost and design). The build rates envisaged are achieveable given the site's location and proximity to Horsham and Crawley; albeit the rail access from Warnham is not as strong as from locations on the Crawley line and the site is close to Land North of Horsham. Given the stage of progress with the site, and outstanding uncertainties, we would envisage a longer potential lead-in time than for other strategic site options. We estimate that the site could deliver c. 950 dwellings over the plan period with completions from 2032/33 onwards and building up to achieving 150 dpa from 2037/38 onwards.

Land West of Billingshurst (Newbridge Park)

3.133 This strategic site is located to the West of Billingshurst, to the west of the A29. The site extends to around 99 ha of land and the scheme is being branded 'Newbridge Park.' The land is in owned by Arunway and Billingshurst Parish Council. Highwood Construction have been appointed as the development partner for the site.

3.134 Two previously separate parcels forming the site have been connected through bringing on board Billingshurst Parish Council with its land - Jubilee Fields – as well as the Billingshurst Sports and Recreation Association in exchange for the provision of sporting facilities via a formal legal Cooperation and Planning Agreement. As a result, there is now 27.5 ha of land identified for residential use and the proposal is to deliver around 1,000 homes. Under the promoter's legal agreement with Billingshurst Parish Council and Billingshurst Sports and Recreation Association, the proposed sports facilities must be started within a defined period after development starts on site; and must be delivered before occupation of the 250th dwelling.

3.135 In respect of education infrastructure, the Council's IDP sets out a requirement for a range of education provision including Primary and Secondary School provision. Highwood proposes to provide a 2FE primary school and special support centre on site. The promoter advised that it has held several meetings with the education authority and that the school location and levels strategy are now understood to be acceptable. The delivery mechanism remains under discussion, with options including the promoter providing serviced land and a contribution, or potentially delivering the school directly with funding from West Sussex County Council for the proportion of the school not attributable to the development.

3.136 No significant highway work was identified as critical or essential in the IDP. The current scheme includes a new roundabout on the A272 and an extra arm on the northern roundabout. The promoter advised in April 2026 that West Sussex County Council had confirmed it was content in principle with the roundabout arrangement and with one or potentially two signal-controlled pedestrian crossings, subject to detailed design and final location.

3.137 Outside of these elements, the Council's IDP does make clear that there are potential capacity issues in the electricity network in the west of the District around the Billingshurst/Adversane area. These issues have been discussed in relation to other sites in this area. In discussions with Iceni the promotor noted that no significant electricity issues are understood to be present which could impede site delivery. The promotor also advised that it has received confirmation that sufficient wastewater capacity exists and that no additional infrastructure works are required to serve the development.

3.138 A pre-application submission was made in July 2025, and public consultation on the site has been held in January 2026. A request for EIA scoping opinion was submitted in January 2026. A hybrid planning application is currently intended to be submitted in October 2026 – albeit this could evidently be influenced by the strategy taken forwards by the Council. The detailed component of this would include 500 dwellings, access and sporting and community facilities.

3.139 The promoter has now confirmed that Vivid is signed up as housing association partner for Newbridge Park and is jointly funding the project. Vivid's housing arm, Bargate Homes, is expected to deliver an early phase of housing south of the A272.

3.140 Based on receiving resolution to grand in June 2027, the promoter then expects a start on site in March 2028 with the first completions later in 2028/29 with 20 homes delivered in that year. They anticipate the delivery rate to rise to 180 homes by 2030/31 with all homes delivered by the end of 2034/35.

Table 3.10: West of Billingshurst: Developer-advised Delivery Programme

Year	Homes
2028/29	20
2029/30	100
2030/31	180
2031/32	180
2032/33	180
2033/34	180
2034/35	160

3.141 In support of this delivery rate, the promoter notes a proven track record with a similar rate of delivery achieved on other sites namely Stoneham in Eastleigh, where annual delivery rates of around 200 homes per annum have been achieved, including over 300 homes in one year. The promoter also indicated that while the current intention is to provide a policy compliant 35% affordable housing, there may be potential for higher affordable housing delivery in practice (as occurred at Stoneham where additional affordable housing was grant funded). This would increase delivery rates. The promotor also referred to a product differentiation in supporting housing delivery, with larger homes on the outer edge of the site overlooking the country park and higher-density development closer to Billingshurst. Care provision is also expected to be provided.

3.142 On the Stoneham site, the promoter has 3 sales outlets all being built out by Highwood and this model would be replicated at the West of Billingshurst. In discussion with Iceni the promoter noted that delivery of 180 homes per year at this site would lie between a traditional delivery rate of 50-60 homes per outlet and the higher rates achieved at Stoneham. However, Iceni would note that the site location is notably different with the Stoneham development being located very close to Southampton and the M27 whereas the Billingshurst site is comparatively in a much more rural location. The intention at West of Billingshurst is to deliver conventional homes of varying types and sizes alongside the retirement element.

3.143 Iceni note the progress being made toward a planning application submission, and inclusion of Vivid which support the potential pace at which this site could come forwards (which is comparable to that for other strategic site options). We consider that there build out rate would potentially be lower than suggested – in particular should other strategic sites in the Billinghurst area be delivering concurrently. Initial completions in 2030/31 would be achievable and with a build rate of 120 dpa it would still be reasonable to expect the full build-out of the site (1,000 homes) in the plan period.

4. REVIEWING THE COUNCIL'S TRAJECTORY

4.1 It is important that the Council's housing trajectory is deliverable and that the Council can demonstrate a five year housing land supply on adoption. This section considers and reviews the preferred strategy, drawing on our review of the market and proposed site allocations in the preceding sections.

Overview of Methodology

4.2 In line with the methodology set out in the 2020 Housing Delivery Study and 2023 update, Iceni has focussed on the level of housing growth in Horsham District as a whole.

4.3 In this update report, our analysis has involved the following two key stages:

- **Council's Draft Housing Trajectory** – Iceni has used the Council's latest draft Housing Trajectory which includes an additional strategic site (Adversane). We have then drawn on our review in Section 4 of the lead-in times and build out rates of the Council's strategic sites to ensure that the assumptions used are realistic and supported by the evidence base and the promoter's own submissions. Iceni has then adjusted the Council's Housing Trajectory accordingly and presented it herein; and

- **Sub-Area Trajectory Analysis** - we have then updated our trajectories for the three different sub-areas used in the 2020 Housing Delivery Study and 2023 update, taking account of new permissions and allocations as well our adjustments to strategic sites where appropriate. This stage also includes due consideration of housing provision in Crawley to ensure that we have an understanding of how the spatial distribution of development could affect delivery potential and potential cross-boundary market influences on market capacity, specifically in the North.

4.4 Through these two steps, we have sought to provide commentary on the realism of the Housing Trajectory at a District and local level to determine whether there are any risks in market capacity terms or whether it is realistic for the Council to move forward with this strategy.

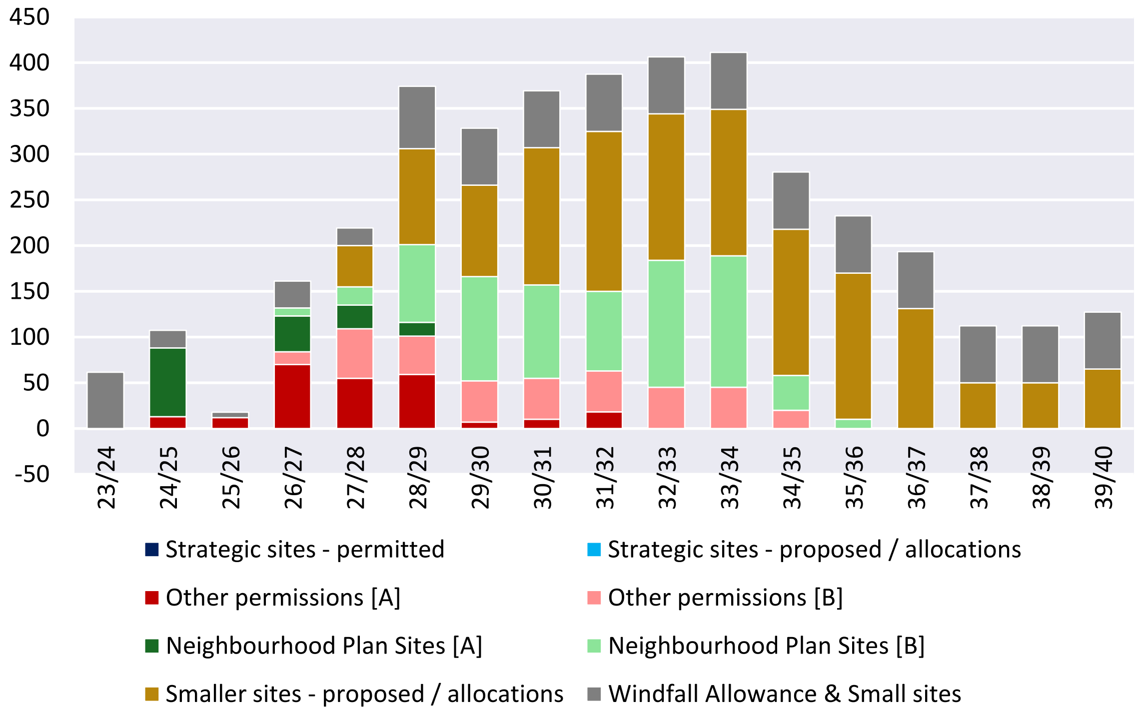
District-Wide Housing Trajectory

4.5 As set out in Chapter 1, Horsham's housing need over the 2023-40 plan period will be for 18,712 homes including contributions to the unmet needs of Crawley and the South Coast. This equates to a compound annual growth rate of 1.48% per annum over the plan period as a whole.

4.6 The Council's draft Housing Trajectory was supplied to Iceni Projects in May 2026 and incorporates the delivery of large and small sites with planning consent in the District, outstanding allocations from both the Horsham District Planning Framework and Neighbourhood Plans, as well as a windfall allowance. The Housing Trajectory also includes the Council's proposed strategic sites allocations, which are – (1) West of Ifield, (2) West of Southwater (3) East of Billingshurst, and (4) Land at Adversane.

4.7 Figure 4.1 below shows the Council's draft Housing Trajectory with adjustments reflecting our analysis of the evidence base and latest submissions and discussions with the strategic site promoters. Iceni have used these to make some adjustments to the Council's trajectory. The District-wide trajectory arising from this sees housing delivery over the 2023-40 period of 1,225 homes per annum on average; with peak delivery of 1,774 homes in 2033/34. The total housing supply would be equal to 20,822 homes and would therefore **provide headroom over the requirement of 11.3% across the plan period.** This headroom is necessary to provide contingency for delay or slippage in site delivery and ensure that the housing requirement can be met.

Figure 4.1: Horsham Housing Trajectory: Iceni Adjustments



4.8 Looking at delivery over five year periods, housing completions average out at 582 homes per annum over the first five years reflective of the delays anticipated with water neutrality issues – this is notably below average housing completions in the District between 2013-21. The evidence points to some 'pent up demand' which is likely to help support delivery rates moving forwards. Over the 2028-35 period, average housing delivery is expected to increase to an average of 1,595 homes per annum as the District's larger strategic sites begin to come on stream. This is 46% higher than the delivery achieved in Horsham District over the 2015-20 period (1089 dpa). It is also above the peak growth rate in achieved in 2018/19 of 1,369 homes. However, housing delivery does, to some degree correspond to the level of growth planned for and historical growth rates should not be regarded as a hard ceiling. The latter years of the plan period would see delivery tail off back down to around 1,200 homes per annum on average.

4.9 The trajectory shows a growth rate in housing stock in Horsham District of 1.6% per annum over the plan period to 2040 – this is above the minimum requirement, equivalent to 1.48% pa, as it provides some headroom for slippage. Over the 2028-35 period where housing delivery would be highest, the growth rate envisaged by the trajectory increases to 2.2% per annum. As the evidence in Section 3 shows, there are some examples of other authorities achieving a similar growth rate than this over a 5-year period, and one (Vale of White Horse) over a ten-year period. Since 2001, a number of high-growth authorities in the South East have averaged growth rates over a 20-year period of around 1.4 to 1.6% per annum.

4.10 It should be noted that current Central Government policy is seeking to increase rates of housing delivery across the Country in the face of persistent historical under-delivery. In addition, higher rates of housing delivery than achieved historically can be delivered if facilitated through a local planning process and supportive development management and supported by infrastructure delivery. In this context, growth rates achieved in the past in other authorities provide some level of guidance for achievable rates of housing delivery.

4.11 The evidence therefore suggests that sustaining a growth rate of 2.2% per annum over the 2028-35 period in Horsham would be challenging but not necessarily unrealistic on the basis of delivery performance in other authorities and a degree of pent-up demand; and that the phasing of delivery at a District level looks achievable. Similarly, the growth rate of 1.48% envisaged by the housing requirement over the full plan period is at the upper end of the long-term range seen in other authorities since 2001 and so is challenging but should be possible to achieve.

Table 4.1: CAGR for Selected Periods

Period	CAGR
Housing requirement over plan period (2023-40)	1.5%
Housing trajectory stock growth over plan period (2023-40)	1.6%
Housing trajectory stock growth over pinch point (2028-35)	2.2%

Sub-Area Analysis

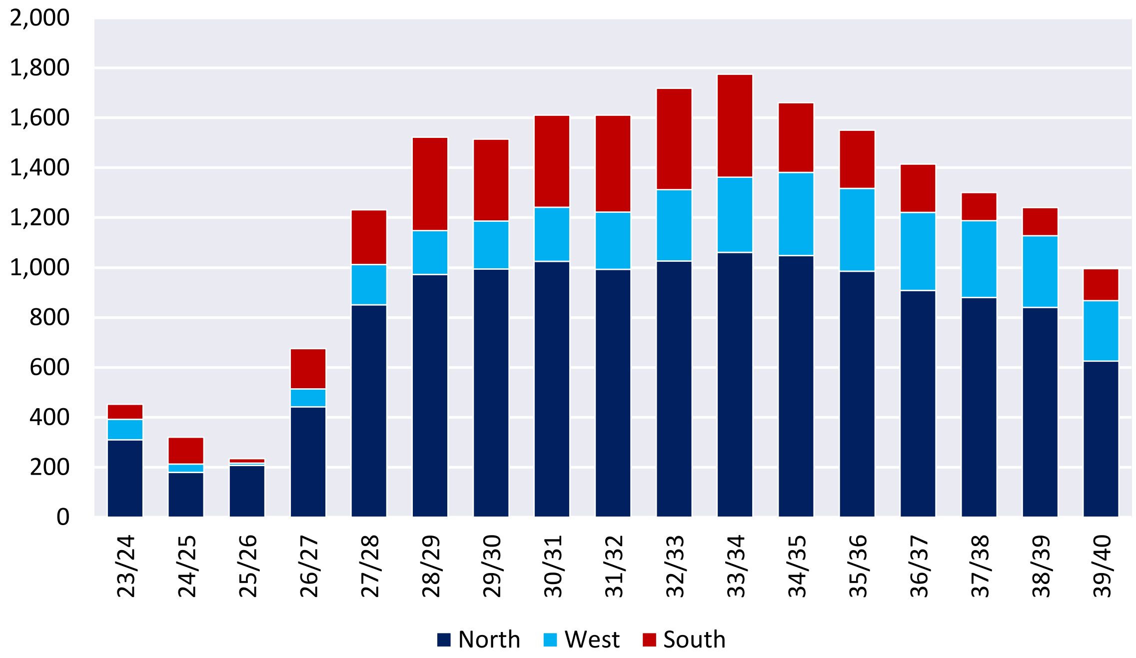
4.12 In line with the 2020 Housing Delivery Study and 2023 Update, Iceni has sought next to break down the Council's draft Housing Trajectory (i.e. the Preferred Strategy), as amended by Iceni, into sub-areas to consider the distribution of development within different areas of the District.

4.13 The three sub-areas are:

- **North**: comprising the parishes/areas of Horsham Town, Broadbridge Heath and Southwater together with surrounding parishes including Colgate, Cowfold, Itchingfield, Lower Beeding, Nuthurst, Rudgwick, Rusper, Shipley, Slinfold, Warnham and West Grinstead;
- **South**: comprising the parishes of Ashington, Ashurst, Bramber, Henfield, Shermanbury, Steyning, Storrington and Sullington, Thakeham, Upper Beeding, Washington, Wiston and Woodmancote;
- **West**: comprising the parishes of Billingshurst, Pulborough and West Chiltington.

4.14 As a starting point, the Figure below shows the share of the District's housing provision in each of the sub-areas. This evidently points to a particular concentration of development in the north of the District (i.e. north of the A272) around Horsham, Southwater and to the West of Crawley around Ifield. This is however the area within the District with the greatest concentration of people, employment and existing services and infrastructure and greater wider accessibility to employment opportunities; and therefore, the area where a higher delivery rate in relative terms could be expected to be sustained.

Figure 4.2: District Housing Trajectory by Sub-Area



4.15 A comparison of the sub-area trajectories indicates that there would be average delivery of 786 homes per annum over the plan period to 2040 in the north sub-area, which would therefore account for 64% of the District's growth. Over the period 2028-37, delivery is expected to be sustained a rate of around 1,000 homes per annum with a peak delivery of 1,061 in 2033/34 in the north sub-area.

4.16 The west sub-area shows more modest growth, delivering an average of 210 homes per annum over the plan period supported by two strategic sites. The south sub-area sees growth of around 229 homes per annum with the majority of housing coming through smaller sites (either allocated through the draft Local Plan or from neighbourhood plans).

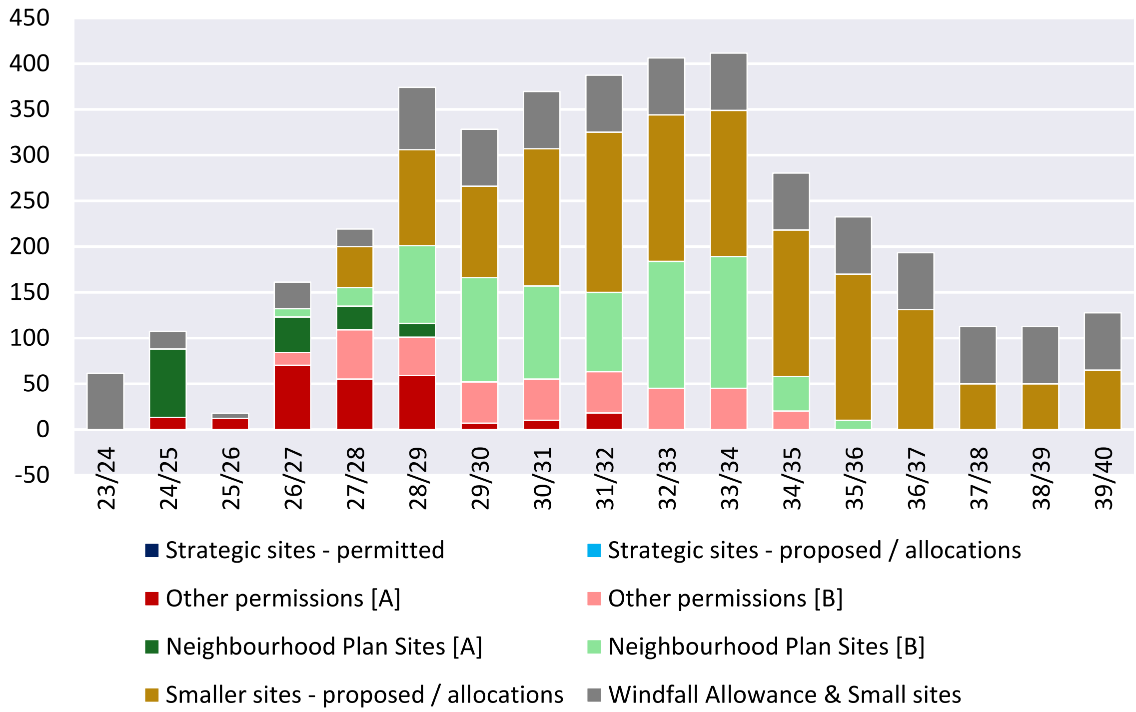
4.17 Our analysis considers each of the sub-areas in turn below.

North Sub-Area

4.18 Iceni has modelled sub-area trajectories in order to better understand the dynamics around housing growth in particular areas of development and to ensure that there is sufficient market capacity to deliver the housing set out in the Council's proposed strategy. In line with our assumptions in the 2020 Housing Delivery Study and 2023 update, we have assumed that 38% of small site development occurs in the north sub-area (i.e. small site commitments and windfalls) on the basis of past trends.

4.19 Iceni has used our analysis of the delivery timescales for the preferred strategic sites as set out in Section 4 of this report. The trajectory for the north sub-area is set out in Figure 4.3 below.

Figure 4.3: North Sub-Area Housing Trajectory



4.20 Our analysis shows that the north sub-area would deliver an average of 786 homes per annum over the plan period with average delivery of 1,017 homes per annum over the period 2028-35. Over the plan period, looking at the north of the District in isolation (i.e. without Crawley Borough) this would equate to a growth rate of 1.7% per annum which is similar to the District average over the period 2013-22 (of 1.7%) and the sub-area average of 1.8% over the same period. Over the period 2028-35 period when delivery is expected to be highest, the growth rate would increase to 2.2% per annum (only slightly above the 2.1% per annum growth rate seen in the North sub area over a 7-year period from 2013-20).

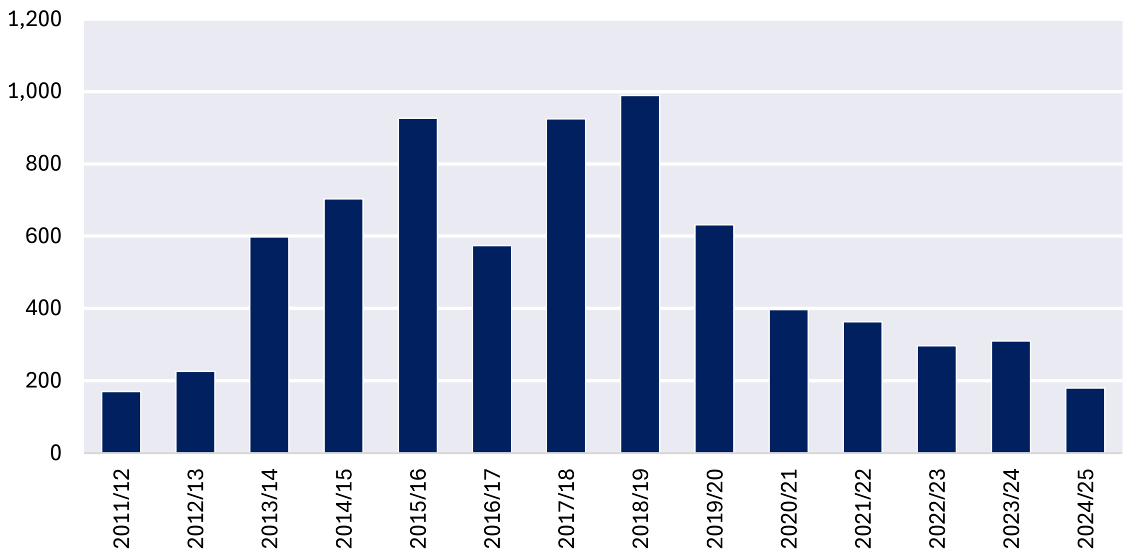
4.21 Given the market characteristics and growth drivers which exist in this area including proximity/transport connections to Crawley, Gatwick and London and a concentration of existing economic activity and services, this area could reasonably sustain growth rates above the District average over the plan period as a whole.

4.22 The rate of growth envisaged in this sub-area is at the higher end of the range for what other local authority areas have achieved historically, but these areas will have included locations within the authority where growth was concentrated and delivery rates were above the local authority average.

4.23 Indeed, looking back to historic completions, the evidence points to a clear upward trajectory in housing delivery in this sub-area over the period to 2019, influenced by the delivery of strategic development schemes including at Broadbridge Heath, North Horsham and Kilnwood Vale. Over the 2012-19 period, delivery averaged out at around 639 homes per annum with peak delivery of around 1,000 homes in 2019 and 925 homes in 2016 and 2018. This is shown in the Figure below. The majority of homes in the north sub-area has come forward at Kilnwood Vale, Horsham (West) (Highwood) and Southwater in the last two years.

4.24 Over the period since 2020, the market has clearly been influenced by COVID-19 and more recently, mortgage rate increases and water neutrality restrictions with a general slowdown in development across the District.

Figure 4.4: Recent Historical Completions in North Sub-Area



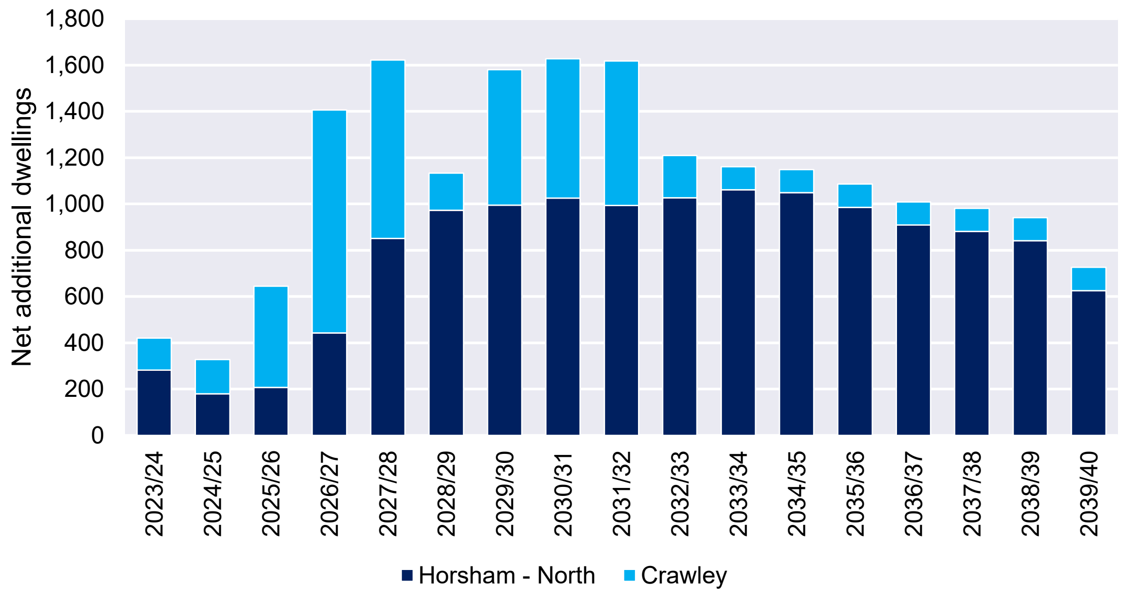
4.25 As a result, looking at the north sub-area in isolation, the evidence suggests that sustaining housing delivery rates of between 900 – 1,100 per annum are achievable and historic completions should also be viewed in a context of the Council planning for a lower housing requirement.

4.26 In line with our approach in the 2020 Housing Delivery Study and 2023 update, it is our view that consideration also needs to be given to the scale of development within Crawley Borough as well when considering this area of the District. Crawley has tight administrative boundaries where land supply is constrained. There is a clear relationship in the north sub-area between the areas within and surrounding Horsham and Crawley Borough, and the development coming forward to the West of Crawley (such as that proposed at West of Ifield; and at Kilnwood Vale).

4.27 Iceni has considered the housing trajectory which accompanied the Crawley Local Plan (this covers the period 2023-40). The Crawley trajectory sees growth of 0.6% per annum over the plan period 2023-40 with peak housing completions in 2026/27 of 964 homes but with development levels falling off shortly thereafter and in particular over the period 2032-40. From 2033/34 onwards, Crawley's trajectory sees only 100 homes delivered per year. This is a low comparative pace of delivery across the plan period for one of the larger towns and larger employment centres in the region.

4.28 **If we consider the growth rate envisaged looking at Crawley and the North sub-area together, we find that the rate of growth envisaged of 1.1% per annum is below that achieved across Horsham District in recent years at 1.7% and the sub-area's average of 1.8% in recent years**. It is also well within what other areas within South East England have achieved historically. Indeed it is aligned to the rate of growth required at a national level to deliver 300,000 homes per annum (1.1% pa).

Figure 4.5: Horsham North Sub-Area and Crawley Combined Trajectory



4.29 Looking specifically at the period 2027-32 where housing delivery is expected to be particularly high in the north sub-area and Crawley Borough combined, the growth rate would increase to 1.6% per annum over this six year period and in absolute terms, housing delivery would be higher at over 1,500 homes per annum on average.

Table 4.2: North Sub-Area & Crawley – Projected Growth Rates

	2023-40	2027-32
Base Stock	88,332	91,132
Projected Growth	18,636	7,578
Future Stock	106,958	98,709
Avg Absolute Growth (p.a.)	1,096	1,515
Growth Rate (p.a.)	1.9%	1.6%

4.30 This is however comparatively low to what has been achieved historically. The north sub-area is the largest sub-area, with strategic sites at West of Ifield and Kilnwood Vale around Crawley, and North Horsham around Horsham Town. In this context, the level of growth envisaged is evidently deliverable from a market capacity perspective. **The delivery of further strategic sites in the north would begin to deliver at pace as Crawley's housing trajectory tails off in the middle of the plan period.**

4.31 With the two main towns in this area – Crawley and Horsham – and growth spread across them and areas to the south of Horsham Town, it can be concluded that this level of growth is achievable and deliverable.

4.32 It is also noted that Gatwick's £2.2 billion expansion, which would allow routine use of the northern as well as main southern runway, was approved in September 2025 and is expected to be fully operational by the early 2030s. As well as direct employment on-site, this is likely to facilitate economic development nearby, which would support higher rates of housing growth in Crawley and surrounds.

West Sub-Area

4.33 Turning to the west sub-area, we have drawn out the categories of supply across the plan period and have assumed, in line with our assumptions in the 2020 Housing Delivery Study and 2023 update, that 10% of small site development (i.e. small site commitments and windfalls) occurs in the west sub-area on the basis of past-trends. The trajectory also reflects assumptions set out in Section 4 around the strategic sites which are expected to come forward in the plan period – East of Billingshurst and Land at Adversane.

4.34 The housing trajectory for the sub-area is shown in the Figure below. The amended trajectory for this sub-area expects to see average completions of 210 homes per annum over the plan period with sustained delivery of an average of 300 homes per annum from 2032/23 – 2039/40 driven by the two strategic sites. This represents a significant quantum of growth in this area – albeit across multiple strategic sites.

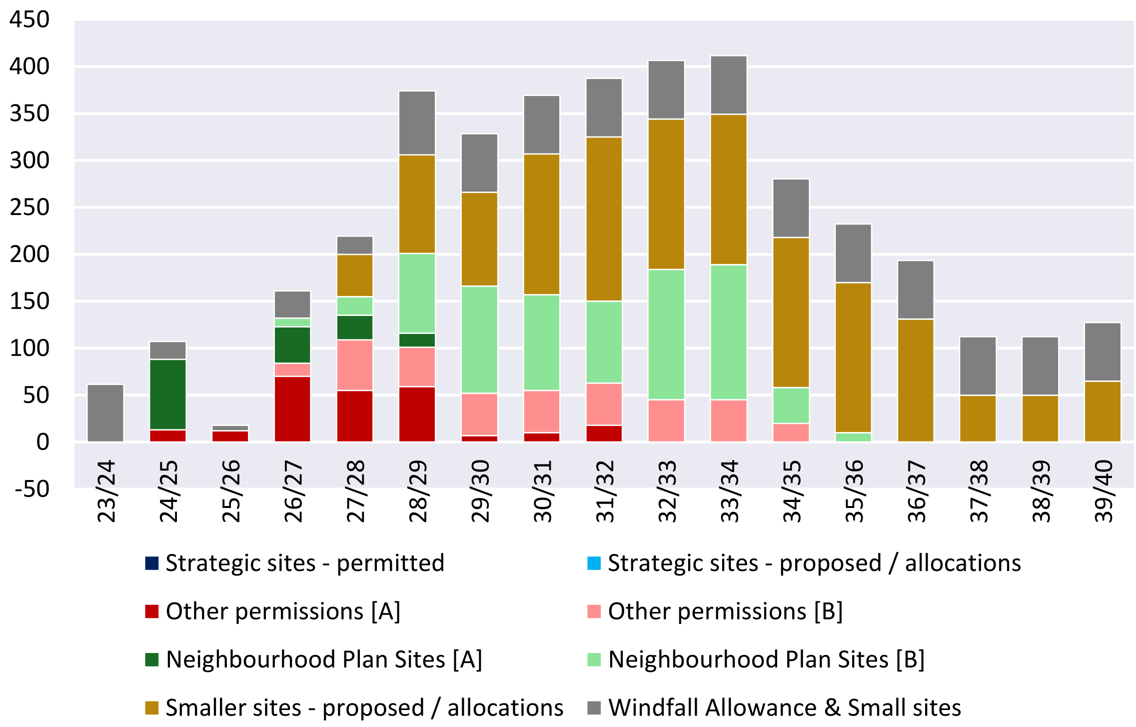
4.35 The level of growth envisaged in the trajectory in the west sub-area would see the housing stock increase at a rate of 2.0% per annum across the plan period. Although this level of growth is above what is required District-wide, the sub-area achieved a reasonably similar level of growth from 2012-21 (1.8%) with several years of stock growth above 2%.

4.36 The high delivery period from 2032-2040 during which both strategic sites are delivery at their maximum rate would see a growth rate of 2.7% pa which is ambitious. There are feasibly some potential market capacity risks to sustaining this pace of delivery over the middle and latter parts of the plan period in a local market which is less well connected to larger employment centres than some other locations. This emphasises the importance of the delivery of employment space to help to support local demand; and to strategies for product differentiation to help to provide for a range of different markets – including build-to-rent, affordable housing and retirement living.

4.37 It is noted that the benchmark stock growth rates shown in Chapter 2 were for entire local government districts. Higher stock growth rates are likely to be achievable in smaller sub-areas of districts, with growth often clustered in particular locations.

4.38 Given the need to meet housing need in Horsham in the context of low completions from 2023/24 – 2026/27 resulting from water neutrality, and of high stock growth rates being required in the north sub-area (2.2% over the 2028-35 period), achieving stock growth of 2.0% over the plan period, and of 2.7% from 2032-40, should be regarded as challenging but possible.

Figure 4.6: West Sub-Area Housing Trajectory

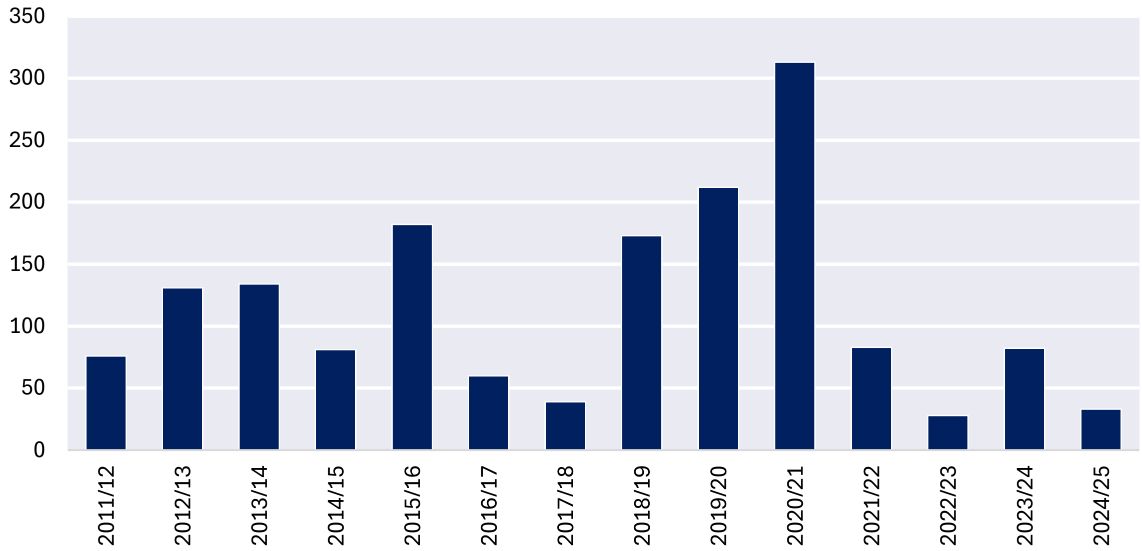


4.39 In considering historic delivery, the Figure below shows that completions averaged 140 homes per annum over the 2012-21 period. However, from 2021/22 – 2024/25, completions have fallen to 57 homes per annum with the area being particularly impacted by poor market conditions – as noted in Section 3 – as well as a number of sites allocated in the last Local Plan being built out.

4.40 The number of homes delivered year-on-year has varied markedly owing to the nature of supply and individual sites coming forward with peak delivery of 313 homes last year in 2021 (similar to the levels which would be sustained from 2034/25 onwards under Council's current trajectory). The growth rate of period 2012-23 was 1.5% per annum and 1.9% over the period 2012-21 before the recent dip in development which is higher than the District average over the same period.

4.41 It is clear that the West sub-area will need to see housing completions increase to and remain at levels near the historical peak, and for stock growth levels to be well above their historical level. This is again noted to be challenging, and to underline the need for housing development to be accompanied by economic drivers in the form of employment space.

Figure 4.7: Recent Historical Completions in West Sub-Area

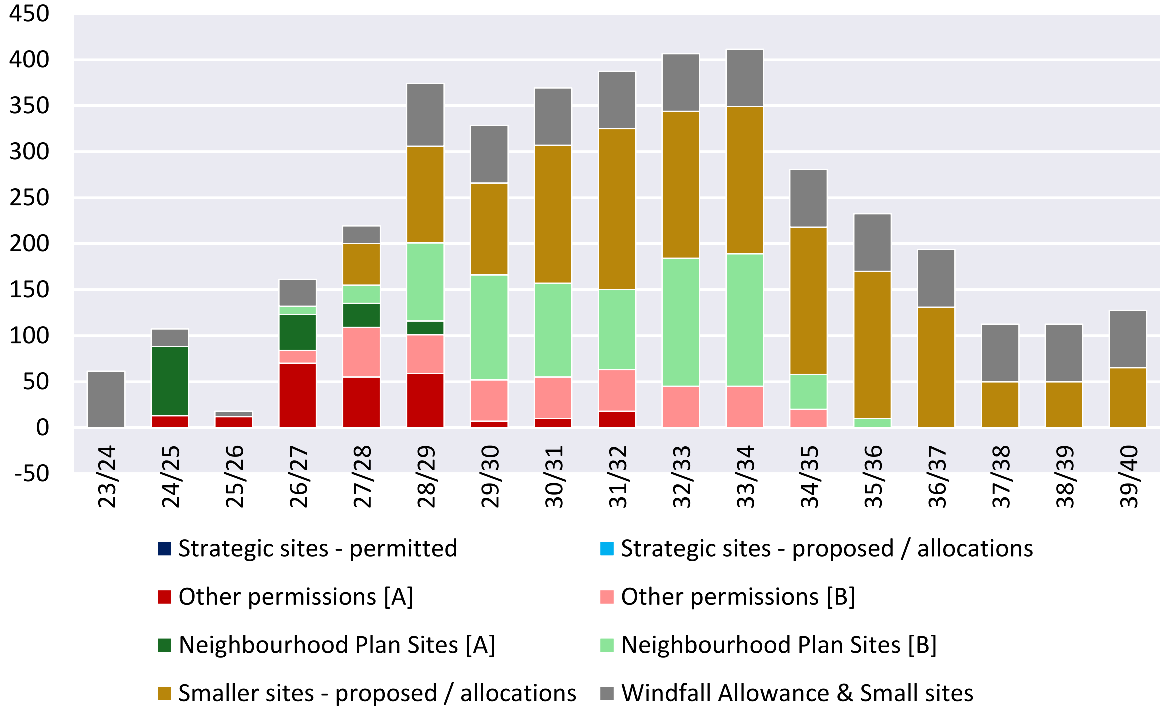


South Sub-Area

4.42 Iceni has assumed, in line with our assumptions in the 2020 Housing Delivery Study and 2023 Update, that 52% of small site development occurs in the south sub-area (i.e. small site commitments and windfall) on the basis of past-trends. There are no strategic sites proposed in this subarea in Council's trajectory. The south sub-area's categories of supply are more focussed on sites coming through Neighbourhood Plans, smaller site allocations and windfall development.

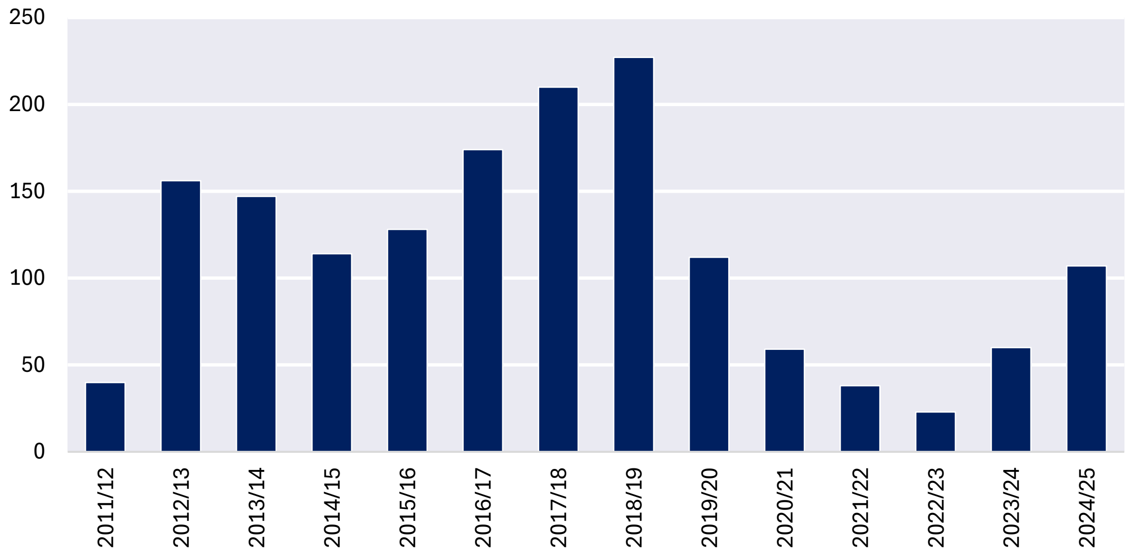
4.43 Across the 2023-40 plan period, it is expected that housing delivery will average out at 229 homes per annum with average delivery increasing over the 2028-34 period to an average of 380 homes per annum as sites identified in Neighbourhood Plans and Local Plan allocations are expected to come on stream. As the housing trajectory in Figure 4.8 below shows, delivery is expected to exceed 360 homes each year from 2028/29 – 2033/34 with the exception of 2029/30, which is a substantially higher rate of development than historically seen in the sub-area.

Figure 4.8: South Sub-Area Housing Trajectory



4.44 Over the plan period, the growth rate in the sub-area would be equal to 1.3% per annum. Over the pinch period of 2028-35, the growth rate is expected to increase to 2.1% per annum. Looking at completions in this area over the 2012-23 period, we note that delivery has averaged 119 homes per annum or 0.8% per annum (with peak sustained delivery of 165 homes per annum over the period 2013-19 or 1.1% per annum).

Figure 4.9: Recent Historical Completions in South Sub-Area



4.45 The historical rate of housing delivery (0.8% stock growth per annum over the longer period of 2012-23) is clearly below what is planned for the sub-area. However, planned growth should be viewed within a context whereby the Council's existing planning strategy focuses development in the north of the District and does not necessarily mean that higher growth cannot be achieved. This sub-area also has strong relationships with the coastal towns to the including Adur and Worthing where housing delivery is very constrained - this can be expected to support market demand.

4.46 Having regard to the trajectory shown in Figure 4.8, there is some potential for smoothing out of delivery over the plan period if housing delivery in the 2028-34 period does not come forwards as fast as envisaged.

5. CONCLUSIONS

5.1 As Iceni's 2020 report and 2023 Update set out, Horsham District Council has a track record in planning for and delivering strategic growth through urban extensions to its main settlements, and to Crawley. The core purpose of this report has been to test that the trajectory corresponding to proposed amendments to the submission local plan is realistic.

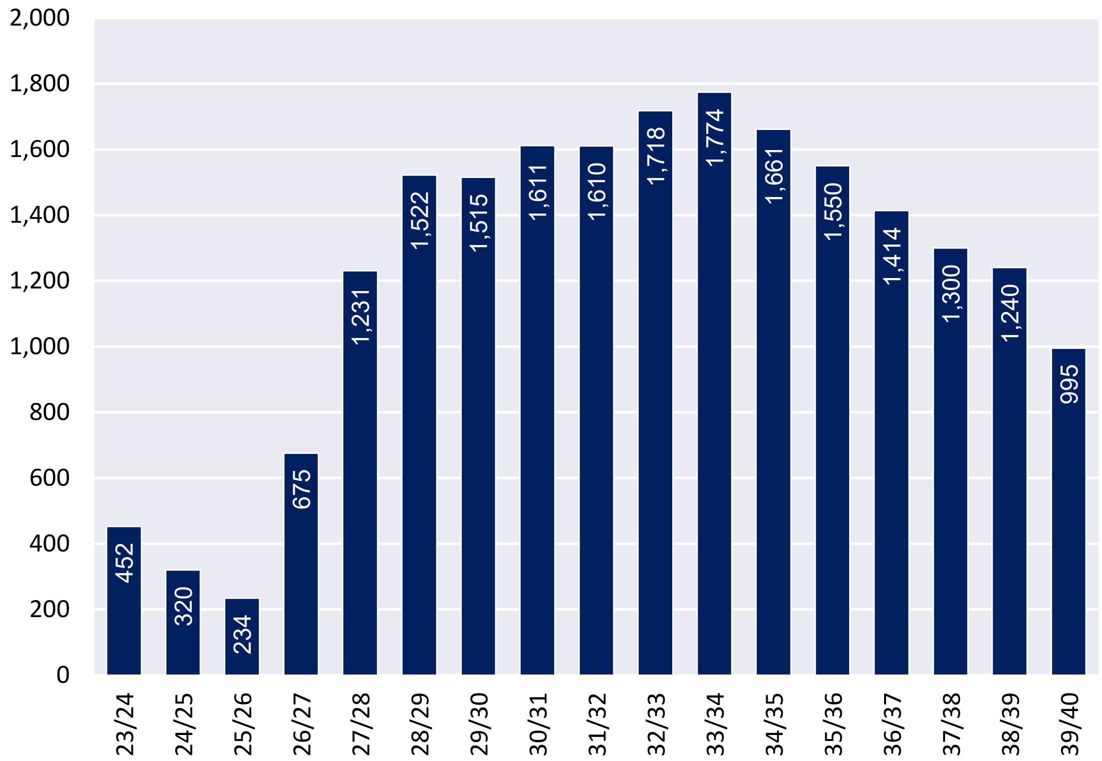
5.2 Consideration has been given to the proposed strategic sites put forwards for allocation in the local plan, including the number of potential developers involved and product differentiation, together with infrastructure issues which may affect the timing and pace of delivery. This builds on other elements of the Plan's evidence base and selected engagement between Iceni and site promoters in the preparation of this report.

5.3 Delivering the local housing need of 18,712 homes equal to 1,101 homes per annum would represent achieving and sustaining a growth rate in the housing stock of 1.5% per annum over the plan period to 2040 as a whole. This sits below the rate of housing growth achieved in the District prior to COVID-19 and water neutrality requirements of 1.7% from 2014-2020.

5.4 While a growth rate of 1.5% per annum over a plan period is at the upper end of growth rates achieved by other authorities in the South East over a 20-year period since 2000, this should not be regarded as unreasonable given the context of Central Government policy to facilitate greater levels of housing development than seen historically, and the potential for local planning to lead to higher levels of growth.

5.5 Taking this into account, over the plan period the supply position is estimated at 20,356 homes or 1,228 homes per annum on average. The planned delivery in early years is very low – largely as a result of the legacy of water neutrality requirements. As a result, delivery will need to ramp up on several strategic sites over the remainer of the plan period in order to deliver growth in line with identified need. The final housing trajectory derived from the modelling is shown in the Figure below.

Figure 5.1: Iceni housing trajectory, 2023-2040



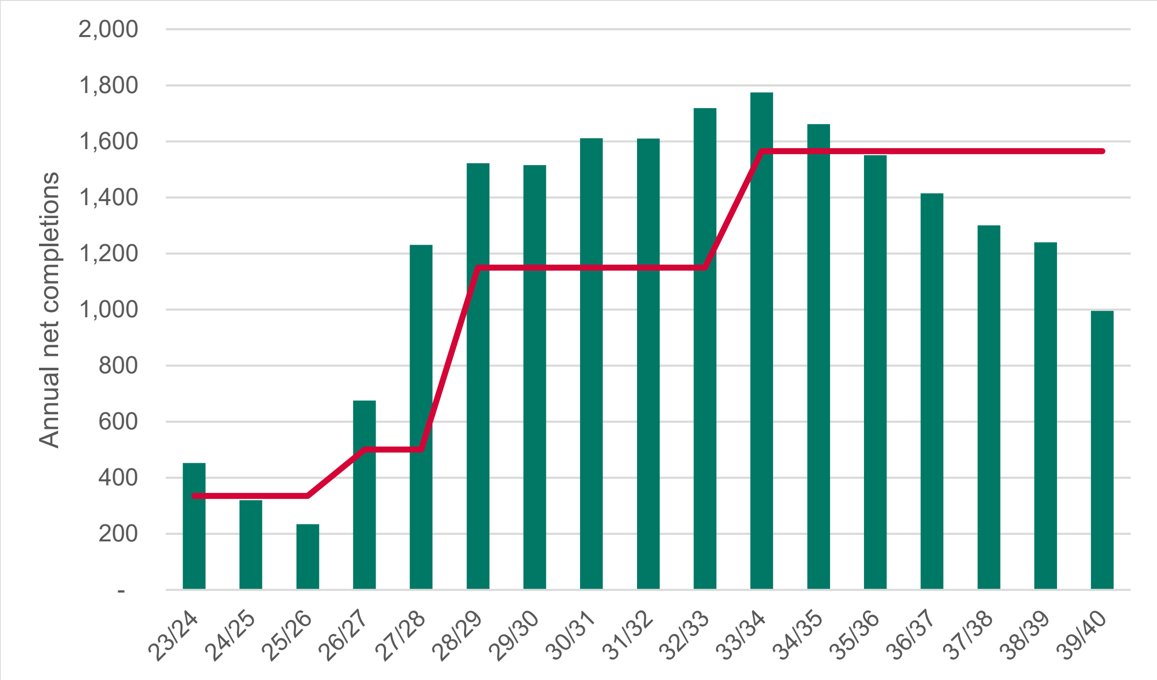
5.6 Supply tails off somewhat from 2034/35 onwards. This provides some resilience to the housing trajectory on the basis that there is an allowance for slippage of peak housing delivery into latter years while delivering on the proposed requirement over the plan period to 2040.

5.7 In determining the housing requirement, the Council should be mindful of the comments in Iceni's 2020 Report, where we identified that the level of land with capacity over the plan period should be 10% or more above the Plan's minimum housing requirement, to ensure some supply-side flexibility to account for potential site specific factors which can delay delivery. It is noted that Council's trajectory, with Iceni's amendments, includes a supply buffer of 11.3% (equivalent to 2,110 dwellings) which we consider is sufficient and provides sufficient comfort that the requirement can be met.

5.8 We consider that there is a strong justification for a phased trajectory to take account of the combination of effects which water neutrality issues on housing delivery in the early part of the plan period, the significant increase in the housing requirement which is now being considered through the local plan and the lead-in time in particular for strategic sites to come forwards.

5.9 A phased trajectory on this basis might see delivery in the historic years (2003-26) which mirrors what has been achieved, then a requirement of 501 dpa from 2026 to 2029, with the lower provision in this period taking account of the weak current pipeline reflecting the the legacy of water neutrality requirements. This could then rise to 1,150 dpa over the subsequent five years (2028-33) and then to 1,565 dpa over the remainder of the plan period from 2033-40. These latter steps reflect the lead-in time for strategic sites which are proposed to be allocated in the Plan. This is shown below with the trajectory overlaid.

Figure 5.2: Proposed Trajectory with Phased Housing Requirement



5.10 The Council will need to take into account, in determining precise figures, the applicable NPPF policies regarding buffers and modelling of its ability to sustain a 5 year land supply for the relevant periods; but should note that the buffer in a five year land supply calculation is intended to be brought forward from later in the plan period.

5.11 In providing some supply-side flexibility, we would note that the strategic sites do include some additional supply which may be delivered beyond 2040 (but could be delivered in the plan period if the market supports higher delivery rates). The Council should take account of site development potential rather than constraining delivery based on the specific trajectory herein, and site allocations can make reference to assumed capacity beyond the plan period.

5.12 Our analysis points to an appropriate geographical spread of development across different sub-market areas, with a high level of growth envisaged in the north of the District in areas where there is a greater concentration of and accessibility to employment opportunities and services, together with existing infrastructure; and which can therefore sustain higher absorption rates for new homes. Growth within this area includes growth both at Horsham and at Crawley.

5.13 There is also some growth proposed in the Southern part of the district, which is appropriate in the context of the need to address some of the unmet need from the coastal authorities to the south.

Table 5.1: Assumed Supply by Sub-Area, 2023-40

	Dwellings	% District Total	Average Growth Rate
North	13,354	64.1%	1.7%
West	3,567	17.1%	2.0%
South	3,901	18.7%	1.3%
District Total	20,822	100.0%	1.6%

5.14 There are potential infrastructure and market capacity constraints which would limit the potential to bring forward significant additional development in the Western sub-area. Iceni has reflected this in the trajectory by adopting a relatively conservative build out rate for Adversane and East of Billingshurst (which could be exceeded in the context of a stronger market). Bringing forward employment land in this area would provide some additional resilience to the trajectory.

5.15 It is noted that relatively high stock growth rates would be required in both the North and West subareas across the plan period and during key pinch points. In line with the discussion in Chapter 4, this should be regarded as challenging but necessary in order to deliver the required level of housing growth in Horsham during the plan period in the context of low delivery earlier in the plan period. In addition, it is noted that it is reasonable to assume higher stock growth rates in sub-areas than across the entire district.

5.16 In conclusion, it is evident that the Council's trajectory with Iceni's amendments is challenging but deliverable from a market capacity perspective.

5.17 Our 2020 Study, in its concluding section, identifies a number of ways in which the delivery risks could be reduced. This included commentary around product differentiation to support delivery rates on strategic sites; the use of planning performance agreements with key site promoters; effective engagement with infrastructure providers and other statutory agencies; upfront infrastructure delivery; and use of modern methods of construction. It is encouraging to see a range of these being considered and taken forwards both by the Council and by strategic site promoters, which adds to the resilience of the trajectory set out.

5.18 The 2020 Study discussed product differentiation and the role which affordable housing (and government funding for it), and other market segments – including different forms of retirement housing, build-to-rent, and self- and custom-build development could have in supporting housing delivery rates. These continue to apply and are of potential heightened importance in the short-term given current sales market conditions. Product diversity beyond the standard 'for sale' market will help to support housing delivery in periods of weaker market conditions.

A1. Review of Evidence

A1.1 This section includes a review of the key evidence base documents which are relevant in particular to the delivery of strategic sites the Horsham Infrastructure Delivery Plan, the 2024 Horsham Transport Study and the 2023 Horsham Local Plan Viability Study. These are inputs to considering delivery timescales for sites in Section 4. It should be noted however that the Council is updating these documents – this is being undertaken concurrently with the preparation of this report.

A1.2 A full review of relevant national and local policy is set out in Section 3 of the 2020 Housing Delivery Study and does not need to be repeated herein. The focus instead is on other key evidence documents which address issues which could affect the timing and pace of housing delivery.

Horsham Infrastructure Delivery Plan (July 2024)

A1.3 The Horsham Infrastructure Delivery Plan ("IDP") is a live document, and the latest iteration available when Iceni commenced preparation of this report was published in July 2024.The IDP is a key piece of the evidence base which assesses the quality and capacity of infrastructure within the District and sets out what further infrastructure is likely to be required to support new development. The IDP is being updated to support the modifications proposed to the Local Plan.

A1.4 The current IDP seeks to address strategic infrastructure requirements both on a District-wide level as well as a local level. The assessment of future infrastructure is linked to the provision of housing proposed in the Regulation 19 Submission Draft Local Plan - which was 13,212 homes over a 17 year period to 2040 including the delivery of the following strategic sites proposed as draft allocations:

- Land West of Ifield: 3,000 homes of which 1,600 in the plan period;
- Land West of Southwater: 1,000 homes of which 735 in the plan period; and
- Land East of Billingshurst: 650 homes all within the plan period.[7]

A1.5 The IDP deals with – (1) the existing infrastructure provision within the District to provide a baseline scenario which aims to identify existing growth pressures within the District; (2) planned provision including an outline of committed works, funding and projects; and (3) future considerations surrounding the likely capacity issues that may occur as a result of delivering the Horsham District Local Plan. This covers a range of infrastructure categories including transport, education and utilities.

[7] Quantums within the plan period have been informed by this Study

A1.6 An Infrastructure Delivery Schedule is then set out which seeks to establish the importance of certain types of infrastructure to the delivery of the emerging Local Plan. This includes 'critical' infrastructure that is vital in 'unlocking' the development of a site; 'essential' infrastructure that may not be immediately necessary in the commencement of development, but without which development would fail in the longer term; and 'desirable' infrastructure, which is services and facilities considered to be required for sustainable growth and to contribute towards good place-making.

A1.7 The Delivery Schedule provides a breakdown of the specific infrastructure required, which sites including strategic site(s) it relates to, the provider, indicative cost (Regulation 19 version sites only), funding sources and delivery timescales. This information has been factored into our overview of the Regulation 19 strategic sites and their anticipated delivery timescales later in this report.

Horsham Transport Study (December 2022)

A1.8 The Horsham Transport Study was published in December 2022 and was prepared by Stantec. The Study provides a transport assessment to support the emerging Local Plan and has been undertaken using a SATURN highway model, which is an industry standard modelling package.

A1.9 The latest Transport Study focusses on the preferred scenario as set out in the Regulation 19 Submission Draft Local Plan. It considers, at a high level, the sustainable travel mitigation and impact on traffic levels across Horsham District and any impacts within neighbouring authorities and on the Strategic Road Network ("SRN"), which in relation to the District is the A23 and the M23. The Transport Study is however being updated to support the modifications proposed to the Local Plan.

A1.10 Including existing commitments, the transport assessment considered the following strategic sites:

- West of Ifield: 3,000 dwellings of which 1,600 in the plan period;
- West of Southwater: 1,200 dwellings of which 840 in the plan period;
- East of Billingshurst: 650 dwellings, all delivered in the plan period;
- North Horsham densification: 500 additional dwellings; and
- 2,9000 dwellings from non-strategic sites.

A1.11 Previous iterations of the Transport Study have however considered other strategic site options in the District, including the potential for new settlements north-east of Henfield, at Buck Barn and at Adversane.

A1.12 The transport assessment modelled the impact on the highways network and junctions within it; and considered sustainable travel mitigation. This included considering any impacts in neighbouring authorities and on the Strategic Road Network.

A1.13 Based on the capacity metrics used within this assessment, the specific mitigation measures implemented ensure that congestion hotspots earmarked within the reference case do not worsen, nor flag any additional junctions as a congestion hotspot. Furthermore, the relative impacts of Local Plan growth on the Strategic Road Network against general traffic growth are minor, with no stand-alone Local Plan mitigation currently proposed.

A1.14 Limited physical highway mitigation is proposed in the Study, with three junctions on the A24 corridor being shown to require mitigation, which is deemed to be deliverable through the Local Plan process. These were:

- A24/ A272 Buck Barn
- A24 / B2237 Hope Oast Roundabout
- A24 / A283 Washington Roundabout

A1.15 Proposed sustainable travel measures (physical and non-physical) and highway physical mitigations were shown to alleviate significant increases of congestion which result from the Local Plan preferred scenario. Evidently these issues will need to be reviewed to take account of the higher growth now envisaged in the Plan.

Horsham Local Plan Viability Study (2023)

A1.16 The Horsham Local Plan Viability Study was first published in July 2021 and updated in 2023. It has been prepared by Aspinall Verdi. The core purpose of the document is to assist in identifying viability impacts of emerging planning policies in the draft Local Plan and includes specific testing of candidate strategic sites. Overall, the report finds that the draft policies are viable and therefore deliverable. The Viability Study is however being updated to support the modifications proposed to the Local Plan and is being prepared concurrently with this Study.

A1.17 The consultants, as part of the strategic site testing, carried out consultations with landowners, promoters and developers associated with the strategic site options. This included gathering information, via a Proforma, on the nature of development, site-specific circumstances (i.e. opportunities/constraints), ownership details and their approach to viability testing. A series of virtual meetings were also carried out with site promoters.

A1.18 The Study carried out a viability assessment of the strategic sites, including 35% affordable housing and all draft policy costs including education, biodiversity and water neutrality contributions. The Study considered the expected capacity and the proposed delivery rates put forward by the site promoters within the plan period - as part of the exercise, the consultants requested further information from site promoters where appropriate.

A1.19 The Study assumes a standard lead-in time for strategic sites, as set out below, for the purposes of its viability analysis.

Table A1.1 Viability Study Assumptions on Lead-in Times

	Months	Years
Planning application submit and determine	12	1
Discharge of pre-commencement conditions	6	0.5
Site preparation and infrastructure	6	0.5
Residential start on site to first dwelling completions	9	0.75
Total lead-in time from application submission	**33**	**2.75**

A1.20 Overall, the viability assessment found that all strategic sites options are viable (i.e. the residual value generated in the appraisals provides a sufficient premium above the (agricultural) existing use land values to support the development of the sites and is above any minimum land value where known) and generates sufficient return to the developer(s).

A1.21 In respect of the three strategic sites to be taken forward in the draft Plan, the Study finds that the residual value generates reflects an appropriate uplift on agricultural values. For East of Billingshurst it finds that assuming there are no contractual minimum payments, there are no significant delivery concerns. For West of Ifield, the Viability Study identifies that upfront infrastructure delivery – including the Western Relief Road and Secondary School – could generate cashflow issues, but there is the potential for Homes England to manage these. No specific concerns are raised in respect of West of Southwater.