



# Hearing Statement – Matter 2: housing supply and headroom

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

**Prepared on behalf of Thakeham Homes Limited**

Thakeham House,  
Summers Place, Stane Street,  
Billingshurst, West Sussex  
RH14 9GN

Prepared by:

Dr Chris Lyons MRTPI

**SLR Consulting Limited**

Mountbatten House, 1 Grosvenor Square, Southampton  
SO15 2JU  
SLR Project No.: 433.000082.00001

9 April 2026

Revision: 4

## 1.0 Matter 2 – housing supply and headroom

### a) The housing supply trajectory as proposed

1.1 The trajectory has some assumptions built in and some ambitious timelines which are unlikely to be achieved but these specific points are best covered later under windfall and headroom.

### b) The reliability of housing delivery assumptions / allowance for non-delivery

1.2 In para. 16 of HDCJB05, the Council states they only include 60% of small sites as progressing but it is not clear if the 40% reduction is already applied in the trajectory.

### c) The reliability of assumptions about windfalls

1.3 The NPPF states in para. 71 that windfall sites must have “compelling evidence” that they will be a reliable source of supply. The Council’s Windfall Study (H09) is a useful document but generates many questions that mean it is not compelling evidence of future trends. For example, Table 1 shows considerable changes across the years and 5 of the 11 years did not achieve the 120 windfall units suggested.

1.4 Table 2 gives more detail and again there is considerable inconsistency from 71-129 units just for the small sites and -31 to 109 for larger sites. Windfall is therefore highly inconsistent and drawing longer term extrapolations is difficult.

1.5 The biggest concern with the windfall policy looking forwards is Policy 39 of the proposed plan for Affordable Housing. This requires greenfield sites of over 10 units to provide 45% of those homes to be affordable. This is a considerable increase on the existing policy of 35% at a time when building costs, finance, labour is all increasing and where the housing market has considerable uncertainty. If this policy remains at that level, then windfall will considerably reduce and historic figures are not reliable. It is unrealistic to take historic delivery figures based upon a different policy framework and to seek to project them forward without making substantive adjustments to allow for policy changes.

1.6 The Council’s analysis in the Windfall Study has not considered this factor which will affect the rate of windfall from larger sites. There is therefore no evidence – and certainly no “compelling” evidence as required by NPPF para.71 – that windfall from large sites subject to a policy requirement for 45% will come forward in line with historic trends. No windfall allowance for larger sites should be made therefore, since no compelling evidence exists for them. 45 units per year of windfall should be deducted from the trajectory. That represents 38% of 120 units. Using Table 3 in



HD09 as the reference point, 62% of windfall in Horsham came from small/medium sites since 2011/2012, and 38% from larger sites.

**d) The robustness of the trajectory**

1.7 See above.

**e) Maintaining adequate housing land supply including a rolling 5 year supply**

1.8 It is clear that the Council will not have a five-year housing land supply on adoption of the Plan even if their evidence on supply is taken at face value. The post-adoption position will be subject to the requirement to have a 20% buffer under the NPPF (2024) and so, in fact, the housing land supply position immediately after adoption (on the figures currently promoted by the Council) would be likely to immediately trigger the tilted balance. This should be avoided, plainly, in order to give a good chance that the spatial strategy for Horsham is delivered in a plan-led way.

1.9 It is considered that the five-year supply is not robust enough. Even if it is accepted that the first three years are effectively committed to low supply, it is considered that the next five years should be able to ramp up quicker if more sites were included. The Council should be instructed to review the deliverable sites in their area in order to identify further smaller sites that would be capable of delivering early in the plan period. This will ensure that there will be likely to be a 5yr supply on adoption and will bolster supply in the critical early years of the plan. For example, Thakeham Homes controls three additional sites that add up to around 300 units that could be included in the supply if the Council is required to go and find more sites. These could be delivering in these years.

**f) Headroom, resilience and the mitigation of risk**

1.10 Given what has been set out above, it is clear that the Plan does not have enough headroom. There are significant gaps in the first five years and then after a short peak in the trajectory the numbers drop back down again and from year 13 on are below 1,000 homes a year. Of the 17 years in the trajectory only five years are actually over the Council's annualised target of 1,049dpa. Given the significant unmet need set out in Matter 1, this number is not likely to be anywhere near high enough. The Council's own evidence shows how close they are to failing to deliver the needed housing in any year of the trajectory even on the current lower number.

1.11 In light of the fact that it is Thakeham's view that HDC's target, as submitted, is too low and is unsound. It is clear that more housing is needed of all scales with small sites for quicker delivery but also larger strategic sites that can build out across the



- whole plan period to increase supply in the mid-term but especially to prop up the later years.
- 1.12 It is crucial to recognise that resilience is about more than just headroom ‘uplift’ expressed in percentage terms, though that is of course critical in ensuring that actual ‘real world’ delivery meets the relevant requirement every year of the plan period. Resilience is also about ensuring that there is a diversified mix of allocations across different size and tenure profiles, and at different locations within the district, that support the housing requirement.
- 1.13 In this context, the Council should look to ensure that its trajectory includes a sufficient quantity of units from super strategic sites (2000+ units) because such sites are inherently more flexible in what they bring forward in terms of housing mix, type and tenure. The ability to bring different outlets on-stream at different points during the delivery cycle of a super strategic site means that the developer can respond to market signals in real time and can directly address the Council’s concerns about “market absorption” more effectively than smaller non ‘super’ strategic sites – though these sites are also important, particularly in early years of a plan period.
- 1.14 Thakeham suggests that the Council is asked to test a range of headroom uplift scenarios of between 5% and 20% to model the likely delivery implications of that uplift. In this way there will be an evidence base for selecting the appropriate figure. That would be more desirable than selecting a figure without an evidence base.

**g) Whether the housing requirement should be stepped**

- 1.15 It is a consequence of using an historic base date that factually a stepped trajectory has to be accepted as years 1-3 are what they are. However, it is considered that years 4-7 do not have to be kept at such a reduced level and as a minimum, years 6 and 7 should be considerably higher. Years 6 and 7 are actually the suggested highest two years of delivery in the Appendix 1 trajectory (HBCJB04a) and so any stepped trajectory should be 1,365dpa from Years 6 onwards, as a minimum. This issue is exacerbated by the existing number being too low.

**h) Whether additional housing allocations are required, and if so, of what kind / size / timing**

- 1.16 Yes, as set out above, a range of new allocations are required across small, medium and strategic size profiles to ensure a suitable, sufficient and stable supply of homes. Thakeham suggests that the Council is asked to produce a site selection methodology, similar to the one produced at Mid-Sussex District Council, which outlines the type of site that the Council will seek to prioritise when it brings forward



additional allocations at the main modifications stage. It is clear that the Council should prioritise:

- (1) sites with access to more than one strategic highway corridor (compared to sites with access to one or fewer);
- (2) sites with transport links to both Crawley and coastal West Sussex;
- (3) sites that can deliver secondary schools;
- (4) sites whose constraints identified in Part II of the HDC Reg.19 Assessment can readily be overcome;
- (5) sites that were previously allocated in previous iterations of the draft plan and which were excluded because of water neutrality issues which have now been overcome;
- (6) sites whose merits were recognised by the previous inspector;
- (7) sites which are of a super strategic nature; and
- (8) sites where employment land can be co-located as part of the scheme so as to provide a labour market close to housing areas.

1.17 The Inspector is respectfully asked to endorse these propositions, and to provide a clear framework to the Council for the next phase in this examination which will involve the Council applying those criteria and bringing forward suitable additional allocations after the Summer. It is better for that framework to be as clear and as robust as possible, as early as possible, in order to avoid debate and to save time when the examination resumes, and to give the Council a clear pathway to adoption.

1.18 In the above context, Thakeham Homes has three medium sized sites of around 100 homes each that should be allocated to help meet the more immediate need.

1.19 Thakeham has also been promoting a large strategic site which was previously allocated under *Strategic Allocation HA5: Land at Buck Barn* (known as Wealdcross), as set out in the 2021 Regulation 19 draft plan. It was recommended to be removed as an allocation “*given the impact of water neutrality on the plan*”<sup>1</sup>. As water neutrality has been removed as an issue, there is no reason why the site cannot be slotted back in and developed as a sustainable landscape-led garden community at the heart of the district.

1.20 The proposed site allocation offers the opportunity to develop a high-quality sustainable garden community based upon a landscape led masterplan which would make a significant contribution towards housing needs of the District and

---

<sup>1</sup> December 2023 SA/SEA page 119



towards unmet housing needs of neighbouring authorities. The size of the Wealdcross proposal offers the opportunity for self-containment, thereby reducing off site traffic impacts, and supporting and promoting sustainable and active travel modes. Its sustainable location in the heart of the district is also a positive attribute and is immediately adjacent to a major highway network (the A29 and A272) meaning that its immediately accessible.

1.21 The proposal would facilitate the provision of a sustainable community, as opposed to just a housing scheme. The scheme would include:

- a) Two primary schools with a nursery
- b) One secondary school (noting that the delivery of new secondary schools is a strategic priority for the Council, as set out at p.5 of HDCJB01)
- c) Employment space to include industry, warehousing, logistics and distribution
- d) Community hub set within a landscaped village green with community run shops and cafe
- e) Up to 3,300 homes
- f) 35% of these homes to be affordable (1,085)
- g) Gypsy and traveller pitches
- h) Around 20 hectares of a new Country Park



