
Hearing Statement

Matter 2: Housing supply and headroom

Horsham Local Plan - Examination in Public

On behalf of Buchanan Trading Inc (ID 1191108)

1. Introduction

- 1.1 Buchanan Trading Inc have instructed Strutt & Parker's planning team to prepare a hearing statement and participate in Matter 2 (Housing supply and headroom) at the examination of the Horsham District Council Local Plan.
- 1.2 Our comments address both the submission version of the Local Plan and the Council's Topic Papers in relation to Matter 1 (the Housing Requirement) and Matter 2 (Housing Supply and Headroom).
- 1.3 We will be participating in the Local Plan hearing sessions on the 22nd and 23rd of April 2026 regarding Matter 2 'Housing supply and headroom' and Matter 3 (Homes to meet the needs of all the community).
- 1.4 Specifically, this representation relates to the Inspector's issue (h) – whether additional housing allocations are required, and if so, of what kind / size / timing. Our submissions should be read in conjunction with our representations made at Regulation 19 Stage. We have also made further site submissions to Horsham District Council directly.

2. Housing Supply and Headroom

Introduction

2.1 The Planning Inspector overseeing the Council's emerging Local Plan raised concerns with soundness of the Local Plan and its housing provision. The Inspectors letter issued on the 5th of January 2026 stated: *"As you acknowledge, the Plan sets a housing requirement which would not meet the local housing need of the district calculated using the standard method. Based on the latest assessment before the Examination it falls short by some 2,275 dwellings"*.

2.2 The Inspector then moved onto the scope of main modifications that would allow the Local Plan examination to continue stating in paragraphs 12 and 13:

"I acknowledge that the Council, through a high-level review of its trajectory suggest that it can as a minimum meet its own need as an annualised figure of 965 homes per annum through delivering more on sites already identified in the Plan and new site allocations. However, it must also be considered whether the Plan's housing requirement should include an unquantified contribution towards substantial unmet needs arising from neighbouring areas. Historically, Horsham district has made contributions towards meeting unmet needs arising from other local authority areas, particularly those arising from Crawley. Horsham's relationship with Crawley is not adequately recognised in the Plan's spatial strategy".

"As you acknowledge in your latest letter, a sufficient supply of sites would need to be provided to ensure any increased housing requirement could be met and it will need to be considered whether additional sites need to be allocated for housing development in the Plan through main modifications. However, I must remind the Council, that I have not yet considered all the sites (including their potential yields) which are already proposed for allocation in the Plan at a hearing and some of those sites are subject to numerous representations opposing them. Furthermore, if new allocations are required as you indicate would be necessary through main modifications, there are numerous alternative sites being promoted for development in the district which are not currently included in the Plan".

2.3 The Council have now issued various topic papers to address the inspectors' comments, Topic Papers 1 and 2 identify a need for a higher housing requirement and a shortfall in supply which must be addressed through main modifications and additional site allocations.

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

- 2.4 Topic paper 1 issued by the Council in March 2026 provides an updated requirement of 17,828 homes (17), which consists of 14,071 units to meet Horsham District's need in full, and 3,757 to meet half of Crawley Borough Council's unmet need (approximately 50%).
- 2.5 The Council's Topic Paper 2 (Table 1 – below) outlines that there is a shortfall of 2,398 units when taking account of the 15,430 current supply of housing, we would submit that this is a minimum. The requirement is likely to be far greater than identified, leading to a larger shortfall in supply. The shortfall is currently unaccounted for in the Local Plan, and further sites will be needed to meet this shortfall.

Table 1: Shortfall in supply

	2023-2040 updated
Proposed housing requirement	17,828
Current Supply	15,430
Current Shortfall	2,398

Table 1 – Topic paper 2 – Housing supply

- 2.6 There is therefore a clear need to allocate further sites to meet this shortfall in supply.
- 2.7 Additionally, Paragraph 19 of the topic paper states:

This requirement, when annualised, would eventually achieve 78% of the December 2025 housing requirement of 1,338. While this does not meet the required 80% meaning that paragraph 236 of the December 2024 NPPF is engaged, the Council considers this can ensure the step from current delivery levels to the housing requirement likely to be required under a new local plan which will proceed under the new legislation is graduated, allowing infrastructure and other mitigation to keep pace with housing delivery, resulting in more sustainable development through the plan period and beyond.

- 2.8 We would suggest that the Council could allocate more sites now to ensure that the housing requirement is in excess of the 80% threshold, so that the Plan does not become out of date on adoption.

- 2.9 In part, this shortfall in supply could be met through the allocation of new sites around sustainable settlements. This would be in accordance with the Council's spatial strategy but would also have a number of additional benefits.
- 2.10 The Council have already have a suite of sites promoted through the previous call for sites and the Regulation 19 consultation, this evidence base should be revisited to consider the ability of further sites to come forward for development in accordance with a greater need for housing.
- 2.11 Small sites are capable of being delivered quickly as they are not likely to require significant up-front infrastructure. Additionally, the identification of a range of sites, including small sites means that they can be delivered alongside one another, therefore offering choice in the market. In particular, if a mix of sites, including the provision of new custom and self-build opportunities, are identified, it can help diversify the housing market and increase customer choice (PPG Paragraph: 16a Reference ID: 57-016a-2021020).
- 2.12 Additionally, the inclusion of new small sites in the District Plan would reduce the Councils reliance for a stepped trajectory and would place less emphasis on the successful delivery of larger sites in year 8-17 (as outlined in table 2 as Topic Paper – Housing Supply). Small sites are capable of coming forward more quickly and earlier in the plan period. It provides resilience in the Council's delivery.
- 2.13 We recognise that due to water neutrality, the Council's delivery of new homes in recent years has been low, however, this makes it even more important that homes are delivered in the early part of the plan period, to meet the need for housing that has gone unmet for several years. Where there are a range of options to increase supply, the Council should not simply rely on large strategic sites to deliver new homes, which inevitably have a long lead in time, meaning that housing needs go unmet for an even longer period. Additionally, reliance on a small number of large sites means that housing needs of the wider district goes unmet. We submit that there is a need to provide a mix of housing types and sizes across the District, to meet the wider needs of local communities.
- 2.14 Paragraph 69 of the NPPF (2023 version) states that "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be

shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing;

c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;

d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

e) work with developers to encourage the sub-division of large sites where this could help speed up the delivery of homes.

2.15 Additionally, paragraph 62 of the NPPF Sept 2023 recognises that the Council must review the size, type and tenure of a housing needs for a range of different groups, this includes people 'wishing to commission of build their own homes'. There is also therefore the potential for the Council to allocate small sites to meet this need (as will be explored in our Matter 3 Hearing Statement) which could provide further choice in the market, enabling a greater delivery of housing.

2.16 It is clear that the Local Plan currently has a significant shortfall in housing supply and the Council's acknowledge that additional sites need to be identified to meet this shortfall. We submit that in accordance with paragraph 69 of the NPPF, the Council must ensure that a proportion of this supply is met through a mix of site sizes and types including the allocation of small (and medium) sites. These can be built out quickly and offer a genuine choice in the market.

3. Summary

- 3.1 Buchanan Trading Inc. support the Council's acknowledgement that there must be an uplift in the housing requirements (as outlined in the Council's recently issued topic papers) to meet the district's housing needs in full and to contribute towards Crawley Borough Council's unmet housing requirements.
- 3.2 However, further sites need to be allocated during the District Plan examination process, to ensure the 2,398 proposed shortfall can be addressed. This shortfall could be reduced through allocation of new small and medium sizes sites adjacent to sustainable settlements through a re-appraisal of sites previously submitted to the Local Plan process.
- 3.3 We will be representing Buchanan Trading Inc. at the Local Plan hearings and will seek further information from the Council regarding their position on small sites and amendments to the proposed housing trajectory.