

Examination of the Horsham District Local Plan

Statement on behalf of Highwood Group

Representation Number(s): 1194363, 1194366, 1194369

Matter 2 –Housing Supply and Headroom

April 2026

Turley

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Client

Highwood Group

Our reference

HIGS3003

April 2026

1. Introduction

- 1.1 This statement is submitted on behalf of Highwood Group, who have interests in the assessed reasonable alternative growth option west of Billingshurst (See Regulation 19. Representations: [Document F](#)). We note and support the re-consideration of this option, alongside other reasonable alternatives, to help meet the land supply shortfalls that will be identified and confirmed after Stage One of this Examination.
- 1.2 We have and will continue to liaise with the LPA to provide further technical information in relation to our clients' interests, to assist the LPA in updating the Sustainability Appraisal that will underpin preferred and final allocations for the submitted plan. In this regard, the LPA will be aware that our client is in pre-application discussions with the LPA on the progression and submission of a comprehensive hybrid planning application for this site, by the end of October 2026. An EIA Scoping Opinion has been issued by the LPA, and is subject to ongoing pre-application meetings and engagement, following a public exhibition in January this year.
- 1.3 This follows a considerable level of engagement with Billingshurst Parish Council, Billingshurst Sport and Recreation Association and a range of other community interest groups, who have informed and offered their support for the comprehensive proposals tabled (See Regulation 19. Representations: [Document F](#) page 13+).
- 1.4 The hybrid planning application will seek consent for a residential-led development for up to 1,100 dwellings, 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated accesses and infrastructure (the 'Proposed Development'). Full permission will be sought within this for the first 500 homes, enabling the delivery of completions within the first five years of the emerging Local Plan's adoption. Further details on this will be shared as part of preparations for Stage 2 of the Examination, to inform and hopefully support the inclusion of this site as an allocation in the submitted Local Plan.
- 1.5 The statement responds to the Inspectors' Issues and Questions for Matter 2 – Housing Supply and Headroom.
- 1.6 Accordingly, we have examined the Inspector's questions for Matter 2 and provide responses to those we wish to contribute to debate on. We have also respectfully requested the opportunity to participate in the forthcoming hearing sessions to assist the Inspector further on such matters.

2. Response to Issues and Questions for Matter 2 – Housing Supply and Headroom

Matter 2a: The housing supply trajectory as proposed

- 2.1 As set out in the Housing Topic Paper (HDCJB05), HDC conclude a shortfall of 2,398 homes against the proposed housing requirement HDC assert under Matter 1 (HDCJB04). In addition, it is evident from the appendix to this paper (HDCJB05a), that HDC will be unable to demonstrate a 5YHLS from the anticipated date of adoption of the Local Plan.
- 2.2 These shortfalls are likely to be compounded and increased on two fronts. Firstly, if the outcome of the hearing from Matter 1 is, as we assert, that an upward adjustment to the current HDC housing requirement is justified. We have set out in our Matter 1 Statement why upward adjustments to this requirement would be justified. Secondly, as set out in this Matter Statement, that the required supply to meet this requirement needs to be greater than that currently assumed. We elaborate on this second matter in response to Matters 2b-h.

Matter 2b: The reliability of housing delivery assumptions / allowance for non-delivery.

Reliability of housing delivery assumptions

- 2.3 Turning first to delivery assumptions. We note HDC updated these assumptions earlier this year, and provide this at document HDCJB05a. Whilst we accept this is at a point in time, and will no doubt be updated further ahead of the Stage 2 examination sessions, it provides an important snapshot, that informs the extent of shortfall HDC need to plan for over the coming months.
- 2.4 Whilst overall we have no particular concerns with the broad assumptions made, there are site specific instances where there are inconsistencies, or are in need of further update. For example, in relation to strategic allocations, it is assumed these are in effect commitments, when it is true to say these still need to be assessed and concluded to be sound at stage 2 of the examination. It is unclear for example, until further evidence is published, why land east of Billingshurst will not come forward until 2032/33, some six years post anticipated adoption. This is surprising given this has been a draft proposed allocation since July 2024, and is of a scale that one would normally expect to see delivered sooner. It is unclear if there are specific delivery concerns arising from this, that are precluding earlier delivery, but we acknowledge these are matters for stage 2 of the examination.
- 2.5 In the interim, this is one of the most sustainable settlements in the district, where there is an acknowledged immediate need for homes now. This six-year delay to completions, coupled with the additional shortfalls highlighted below, further justifies the case for exploring additional allocations at this settlement in our view. Particularly sites capable of yielding homes within the first five years of the plan period. As set out in the introduction to this Statement, our client considers land under their control west of

Billingshurst to present such an opportunity, and will continue to liaise with HDC in support of this between stage 1 and stage 2 of the examination.

- 2.6 A further site that we consider may need further adjustments to delivery assumptions, includes Land West of Ifield. HDC assume 80 completions in 2029/30. However, whilst an outline application has been submitted for the site (DC/25/1312), there remain unresolved holding objections from, amongst others, National Highways. In respect of the latter, National Highways have re-issued their September 2025 holding objection, as of March 2026, reasserting '*it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability, and operational efficiency of the SRN.*' A request not to determine, unless refuse, until June 2026 is made, to allow further time for the applicant to provide such information¹.
- 2.7 There are also unresolved objections from Gatwick Airport, on aerodrome safeguarding, noise, water and surface access. Historic England has also raised matters which may have implications for site capacity. Whilst we have no objection to the identification of this site in principle, there is uncertainty over when planning consents will be granted, and when first completions will be made in light. Significant forward infrastructure is envisaged on this 3000-home mixed use site, which calls into question the HDC assumed first completions (80No.) in 2029/30.
- 2.8 As set out in a well-thumbed national research update 'Start to Finish – Third Edition' (Lichfields, Sept 2024)², an overall average lead in time for delivery of sites over 2000 homes, would be 6.6 years from validation of first application to completion of the first dwelling. As is evident from examining this site further, this is not an average site, it is a particularly complex site with significant infrastructure lead in. Adopting the above average in itself may therefore be optimistic, but at least would be based on evidence deduced from a wider sample of similar scale sites. We would suggest delivery assumptions are revisited to ensure they are as robust as possible. This will have implications for rolling five-year housing supply requirements that need to be considered alongside other matters we highlight in the remainder of this section.

Allowance for non-delivery

- 2.9 The above example highlights how important it is to allow for slippage / non-implementation within envisaged timescales. Table 3 of the Housing Topic Paper (HDCJB05) illustrates the implications of factoring in two non-implementation allowances. A 0% allowance is not in our experience appropriate or likely to be effective in ensuring the plans requirements are met in full within the plan period. Typically, a 10% allowance would be sought as a minimum to provide a degree of certainty that the requirements are met in full. This is particularly justified in this instance, given the housing requirement (1,049dpa) HDC are pursuing is acknowledged to be an interim one, which is less than 80% of the latest calculated local housing need (1,338 dpa³). There are uncertainties over when a subsequent review of the plan will be undertaken, and when this will eventually be adopted. In the interim therefore, it is essential HDC ensure the interim requirements are capable of being met in full, and on a rolling five-year basis to

¹ [Land West of Ifield DC/25/1312 - National Highways Response \(March 2026\)](#)

² [LF66761 Start to Finish 3 \(update\) - Feb25.indd](#) Figure 3.1, p. 8

³ Paragraph 19 HDCJB04 – Housing Requirement Topic paper

meet the needs of the area. Particularly, as we highlight in our Matter 1 Statement, the acute level of affordable housing needs this district faces.

- 2.10 In light of the foregoing, we would suggest a percentage allowance closer to the HDC high growth option is justified. We note, as agreed with PINS in advance of resuming this examination, HDC have started to explore this as one of the options (Table 3 of HDCJB05). We would endorse this to ensure the plan is effective at point of adoption. This allowance will need to be considered in the context of the higher housing requirement we assert is equally justified in our Matter 1 Statement. Taken together, it is evident the housing land supply shortfall over the plan period, and in the first five years post adoption, is significantly higher than HDC currently calculate.
- 2.11 A range of additional site allocations are accordingly required to meet this shortfall, including sites capable of delivering units both over the plan period, and/or in the first five years post adoption. Whilst strategic scale sites may take longer to deliver, they provide a greater level of assurance on infrastructure delivery timing than a range of smaller sites that cumulatively have similar impacts, but which are harder to co-ordinate. Sites that can contribute to supply in the first five years post adoption provide an added benefit in the HDC context, given the significant shortfalls evident at present, and the objectives of the Framework in such regards to significantly boost supply⁴.

Matter 2c: The reliability of assumptions about windfalls.

- 2.12 HDC seek to roll forward historic windfall rates uniformly over the remainder of the plan period, at a rate of 120dpa. However, if one examines such historic rates, it is evident 34% of windfall completions have arisen from greenfield sites⁵, with a large site green field outlier in 2022-23 of 102 homes. There are likely to be many factors that contributed to this, not least of which being the aged nature of the Local Plan (2015). Once the Local Plan is updated, with a sufficient quantum and range of sites to maintain a rolling 5YHLS, one would anticipate a declining recourse to large site windfall, particularly from green field sources.
- 2.13 Whilst we appreciate where windfall is concerned, there is a great deal of uncertainty by its very nature, given the foregoing context of this interim HDC Local Plan, and shortfalls evident as a consequence, it is essential in our view that windfall not be relied upon as a source of supply to meet the requirement identified from the Matter 1 session. It further emphasises the need for windfall to be exactly that, additional comfort or buffer to allocated supply. It supports the need to allocate a range of additional allocated sites to meet shortfalls, and provide a greater level of certainty requirements will be met within the plan period.

Matter 2d: The robustness of the trajectory.

- 2.14 See response to Matter 1a-c.

⁴ Paragraph 60 (2023 Framework) or 61 (2024 Framework).

⁵ Table 3, Windfall Study, HDC 2024 (Document H09).

Matter 2e: Maintaining adequate housing land supply including a rolling 5-year supply.

- 2.15 As set out in our response to Matter 1a, it is evident HDC cannot meet the requirements of paragraph 69a) of the Framework, as sufficient specific, deliverable sites for the first five years of the plan period post anticipated adoption have not been identified to meet the minimum identified requirement⁶.
- 2.16 Seeking to adopt a stepped requirement to retrospectively remedy this position would significantly undermine the government's objective to significantly boost the supply of homes⁷, during a period many commentators describe as a national housing crisis⁸. It would also fail to positively prepare to meet an evident acute need for housing in this area (see our Matter 1 Statement), delaying actions that could make a meaningful difference in the short term. This includes actions that can be taken now to identify a greater quantum and range of sites to meet the requirements of paragraph 69 of the Framework.
- 2.17 This includes consideration of strategic sites capable of yielding units within the first five years of the plan period. As set out in the introduction to this Statement, our client considers lands under their control west of Billingshurst to present just such an opportunity, and will continue to liaise with HDC in support of this between stage 1 and stage 2 of the examination.

Matter 2f: Headroom, resilience and the mitigation of risk.

- 2.18 See response to Matter 2b.

Matter 2g: Whether the housing requirement should be stepped.

- 2.19 See response to Matter 2e. We do not consider this approach is justified or consistent with national guidance in this instance. We have provided evidence to justify the need to identify a range of additional sources of supply to meet requirements both over the plan period, and in the first five years of this period. HDC have not provided evidence to demonstrate that even after the identification of such additional supply, delivery trajectories support the need for a stepped requirement. Much of this evidence will arise between Stage 1 and Stage 2, as additional sites are identified and added to the trajectory.

⁶ [HDCJB05a-Appendix-1](#) - 2,315 home accrued shortfall 2023/24 to 2026/27 to recover, and 5,854 supply for five-year period 2027/28 to 2031/32, versus even the low growth option minimum requirement.

⁷ Paragraph 60 of the Framework (2023)

⁸ [English Housing Survey 2023 to 2024: experiences of the 'housing crisis' - GOV.UK](#); [National Housing Federation - Let's fix the housing crisis](#); [Housing crisis in the UK | Crisis UK](#); [Tackling the under-supply of housing in England - House of Commons Library](#)

Matter 2h: Whether additional housing allocations are required, and if so, of what kind / size / timing.

- 2.20 See response to Matter 2a-g. There is compelling evidence of the need to identify and allocate a range of additional sources of supply to meet requirements both over the plan period, and in the first five years of this period. As set out in the introduction to this Statement, our client considers lands under their control west of Billingshurst to present just such an opportunity, capable of yielding units over the plan period and first five years of that period. Our client will accordingly continue to liaise with HDC in support of the identification of this site for allocation between stage 1 and stage 2 of the examination.

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