


**Horsham District Council Local Plan
Examination
Hearing Statement for Matter 2**

April 2026

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Client

A2Dominion

Our reference

A2DS3001

April 2026

1. Introduction

- 1.1 This Statement is submitted on behalf of A2 Dominion (hereafter referred to as 'A2D') to the Horsham Local Plan Examination in response to 'Matter 2: Housing supply and headroom' set out in the Inspector's Draft Hearing Agenda / Programme document (IDJB03 – 16th March 2026).
- 1.2 This statement should be read in conjunction with the other statements submitted on behalf of A2D, and their representations to consultations on the draft Local Plan.

2. Response to Matter 2: Housing supply and headroom

A. The housing supply trajectory as proposed

- 2.1 An updated and revised trajectory was produced and submitted as Appendix 1 to HDC's Housing Supply and Headroom Topic Paper (HDCJB05), identifying a plan period supply of 15,430 dwellings. This followed an earlier submission on 12th February 2026 (HDCJB01 (Appendix A)) which identified a plan period supply of 14,722.
- 2.2 At the outset, we note HDC has, within around one month, provided the Inspector with two trajectories claiming very different levels of housing growth.
- 2.3 Our response is anchored to the trajectory appended to HDC's Housing Supply and Headroom Topic Paper (HDCJB05).
- 2.4 The trajectory in HDCJB05 sets out HDC's anticipated delivery of homes across the plan period from 2023 to 2040, totalling a claimed supply of 15,430 dwellings against HDC's revised requirement of 17,828.
- 2.5 Even if this trajectory is robust, the Council's latest position is (paragraph 9 of HDCJB05) *"The supply update outlined above totals 15,430. As set out in the trajectory in Appendix 1 this results in a shortfall of 2,398 homes against the requirement set out in the Council's Matter 1 topic paper (see Table 1 overleaf)"*.
- 2.6 Even the latest trajectory (HDCJB05), despite increasing claimed supply by over 700 dwellings compared to the February version, still falls substantially short of the requirement. The revision does not resolve the fundamental undersupply position.
- 2.7 The trajectory (HDCJB05) supply is made up from five broad categories, visualised below:

Source of Supply	23/24 – 24/25	25/26 – 27/28	28/29 – 32/33	33/34 – 39/40	Total
Completions	722	-	-	-	722
Commitments	-	2,061	2,981	3,186	8,228
Strategic Allocations	-	0	825	2,435	3,260
Settlement Allocations	-	95	1,361	274	1,730
Windfalls	-	0	600	840	1,440
Total	722	2,156	5,767	6,735	15,430

- 2.8 772 dwellings were delivered in the first two years. A further 2,156 are projected between 2025/26 – 2027/28, giving a total of just 2,928 dwellings in the first five years against an annual requirement demanding over 4,500 dwellings in that period. Approximately 81% of total claimed supply falls between 2028/29 – 2039/40, heavily dependent on sites at outline permission stage, proposed allocation stage or entirely unidentified.
- 2.9 The three proposed strategic allocations account for 3,260 dwellings. Land West of Ifield (1,600 dwellings) has a live outline application but no decision. Land Northwest of Southwater (950 dwellings) had its application submitted only in March 2026 and is in the early stages of consideration. Land East of Billingshurst (650 dwellings) has no extant permission. All three are assumed to begin delivering by 2029/30 at the latest.
- 2.10 We urge significant caution regarding this trajectory as it stands. It is particularly optimistic, is not based on any updated evidence from site promoters or developers. It also predetermines any subsequent analysis as to the soundness of proposed allocations and sources of supply.
- 2.11 The unmet need contribution of 3,757 dwellings is shown as a uniform 221 dpa throughout the plan period but has no site-specific breakdown or delivery trajectory. There is no indication as to whether this will be addressed by sites which actually meet that need in a spatial sense. It is our view and in the interest of sustainable development that the unmet needs of Crawley should be met closest to where the need arises.

B. The reliability of housing delivery assumptions / allowance for non-delivery

- 2.12 The March trajectory does not apply any discount or buffer to account for sites that may not deliver as planned. Every permission and allocation is counted at its full capacity. The only concession to the possibility of non-delivery is a 60% completion rate applied to small sites of 1 to 4 dwellings (Paper HDCJB05 paragraph 16). Nothing equivalent is applied to larger sites, where the risks around infrastructure, viability, planning delays and market conditions are considerably greater.
- 2.13 HDC's method for checking whether their delivery figures are realistic (Paper HDCJB05 paragraphs 14 to 15) is to ask developers what they are planning to do and then compare that against what HDC know from experience. There is no independent check, no testing of what happens if things go wrong, and no explanation of how HDC have dealt with cases where developer intentions looked unrealistic. Saying the figures "*can be relied on to deliver as set out in the trajectory*" is not a reliable or evidential basis.
- 2.14 We understand that HDC may have approached site promoters / developers for delivery information, that evidence is not presented and cannot be scrutinised.
- 2.15 HDC's Topic Paper (Table 3) sets out how many homes have been completed in the district each year since 2011. The trajectory requires delivery to reach 1,047 homes per year by 2027/28 and then peak at 1,340 homes per year in 2028/29, staying above 1,000 homes per year through to 2034/35. In the fourteen years since 2011, HDC only managed more than 1,000 completions in three years – 2015/16, 2017/18 and 2018/19. The most recent figure is just 328 homes in 2024/25.

- 2.16 The trajectory relies on delivery quadrupling within three years and then remaining consistently high for close to a decade. Those earlier peak years were the product of a very different situation. Multiple large sites from the previous local plan were already well underway, with permissions in place, infrastructure built and homes being sold. That pipeline no longer exists.
- 2.17 The Lichfields Start to Finish Report¹ (March 2024) provides relevant and up-to-date evidence on the delivery of large-scale residential development. The 2024 edition reflects real world delivery data across 179 sites of 500 dwellings or more and accounts for the slowdown in plan-making and decision-taking observed in recent years.
- 2.18 The report finds that the average time from validation of an outline application to first dwelling completion for sites of 500 dwellings or more ranges between 4.9 and 6.7 years, depending on site size. Only sites of 99 dwellings or fewer typically deliver any homes within an immediate five-year period from validation. Sites of 100-499 dwellings and those of 1,000 dwellings or more both demonstrate combined planning approval and planning-to-delivery periods of approximately 6-7 years, despite variation in overall scale.
- 2.19 The evidence further shows that while implementation following grant of permission proceeds relatively efficiently (approximately 1.3-1.6 years for large sites), the principal delay lies in securing outline and detailed approvals. On average, it takes approximately 3-4.6 years from the grant of outline permission to first dwelling completion. Accordingly, even at the point outline permission is granted, limited delivery can typically be expected within the subsequent five-year period.
- 2.20 Horsham Golf Park received outline permission at appeal in July 2025. The trajectory assumes first homes will be completed in 2028/29, roughly three years after outline permission was granted. For a site of 800 dwellings, Lichfields puts the average time from validation to first completion at around 5.5 years. Squeezing the entire process into three years from outline grant sits at the very optimistic end of what the national evidence suggests is possible. First completions in 2028/29 are not credible, and the assumed delivery of 100 homes in 2029/30 is equally questionable. A realistic first completion date, based on the Lichfields average, would be no earlier than 2030/31.
- 2.21 Land North of Horsham RM Area 10 is shown in the trajectory as an outline site expected to deliver 70 homes in 2028/29 and a further 100 in 2029/30. A review of HDC's planning portal shows that no outline planning application for RM Area 10 has been submitted. The Lichfields lead-in period has not even started. Even if an outline application were submitted and approved quickly in 2026, expecting first completions before 2030/31 would be highly optimistic. The assumption of 70 homes being delivered in 2028/29 has no reasonable evidential basis.

¹ [Lichfields Start to Finish Report \(March 2024\)](#)

- 2.22 Between them, Horsham Golf Park and RM Area 10 are shown as delivering 350 homes in 2028/29 and 2029/30. Removing those contributions from the 5-year supply calculation on the basis of the Lichfields evidence reduces the projected supply for 2025/26 to 2029/30 from 4,760 dwellings to around 4,410 dwellings. Against HDC's own buffered 5-year requirement of 5,448 dwellings, that gives an implied supply of around 4.9 years, and that is before any adjustment is made for the other outline and allocation-stage sites that are also assumed to be delivering in 2028/29 and 2029/30 on equally questionable assumptions.
- 2.23 If the settlement allocations are also taken out of the calculation, these sites are shown as delivering 508 homes across 2027/28 to 2029/30 but none of them has planning permission, the 5-year supply position deteriorates further. These sites have yet to go through any part of the planning process and cannot realistically be expected to be delivering homes within that timeframe.

C. The reliability of assumptions about windfalls

- 2.24 The March trajectory includes a windfall allowance of 1,440 dwellings at a flat 120 dpa from 2028/29 to the end of the Plan period, approximately 9.3% of total claimed supply. HDC rely on their Windfall Study (H09, January 2024) to justify this. We have significant concerns about both the study and its application.
- 2.25 We understand the evidence in that report also includes sites which came through the appeal process during periods when they could not demonstrate a 5-year housing land supply.
- 2.26 The dataset also includes 2022/23, a year when windfalls appeared to make up 45% of all completions. This is not evidence of a genuine surge in windfall development, it is a distortion caused by the sharp fall in overall housing delivery that year. Including it inflates the average that HDC then use to derive the 120 dpa figure.
- 2.27 The Windfall Study was produced in January 2024 and has not been updated to reflect the intervening period. The study's own projections in Table 4 apply windfalls from 2026/27 onwards, giving a total windfall contribution of 1,680 dwellings over the plan period. The March trajectory pushes this back to 2028/29, reducing the windfall contribution to 1,440 dwellings. No updated evidence has been provided to justify this change, the trajectory simply departs from its own evidence base without explanation.
- 2.28 HDC's study (paragraph 5.5 of H09) accepts that windfall delivery tends to go up and down in line with overall housing delivery. That directly undermines the assumption of a flat 120 dwellings every single year, if windfalls track overall delivery, they will be lower in slow years and higher in busy years. A flat annual figure is not an evidence-based projection, it is a rough assumption.

D. The robustness of the trajectory

- 2.29 The trajectory is not reliable. It has already changed significantly during the examination process with claimed supply increasing by over 700 dwellings between the February and March versions.
- 2.30 The delivery figures in the trajectory are said to be based on what developers have told HDC they plan to do, without any independent check on whether those intentions are realistic. No discount is applied to account for the fact that large sites may not deliver as planned, yet HDC's own data shows that 40% of small site permissions never result in completed homes. If HDC accept that 40% of small permissions fall through, it is difficult to understand why they apply no equivalent caution to much larger and more complex sites.
- 2.31 We note HDC's own evidence regarding the delivery of the current allocation at Land North of Horsham, which has delivered just 8% of its total capacity. The trajectory assumes its remaining phases will deliver at 125-160 homes per year at the same time as several other large sites are also building out, with no assessment of whether the local market can absorb that level of concurrent delivery.
- 2.32 HDC's Topic Paper states at paragraph 19 that the Housing Delivery Study which sits behind the trajectory is currently being updated, and that the updated findings are expected to feed into a revised trajectory. In other words, HDC themselves accept that the evidence base for the trajectory is not yet complete. The Inspector is being asked to accept a document that its own authors say needs further work before it can be finalised.

E. Maintaining adequate housing land supply including a rolling 5-year supply

- 2.33 Appendix 1 of this Statement includes a series of housing land supply calculations. These do not dispute any of the HDC delivery assumption (but that is not to suggest they are agreed).
- 2.34 Our Appendix 1 (table 2) reaffirms that the level of supply anticipated falls significantly short of the requirement. This is also HDC's position.
- 2.35 In our Appendix 1 (table 2a), we take the Council's delivery assumptions, and the stepped trajectory in the Topic Paper and calculate the housing land supply position. A 20% buffer is applied from 2026 onwards as the housing requirement is less than 80% of LHN. In this case, with the Council's assumptions, a five-year supply would be maintained, until 2027/2028 when it falls below five-years and never recovers. The only reason why a five-year supply is maintained early in the Plan-period is because of the reduced requirement proposed by HDC.

- 2.36 In our Appendix 1 (table 2b), we adopt the same approach as above, but demonstrate the implications of addressing an accrued shortfall (where one arises) within the forthcoming five-year period. In the early years of the Plan-period post adoption, HDC's approach artificially limits and removes the concept of accrued shortfall (as HDCJB05 proposes to set the requirement at the level of completions). As with the previous calculation, a shortfall arises in 2027/2028, but when an accrued shortfall does arise, the housing land supply deficit deepens.
- 2.37 In our submission, we suggest that the only reason HDC proposes to set a low requirement early in the Plan period is because in all other scenarios, it would be unable to demonstrate a five-year supply.
- 2.38 Appendix 1 (table 3) demonstrates the implications of providing for an annualised requirement of 1,049 dwellings throughout the Plan-period. At each point, the cumulative supply is significantly and severely below the cumulative requirement.
- 2.39 Table 3a in Appendix 1 again uses the Council's delivery trajectory and a 20% buffer from 2026. This calculation uses a flat requirement of 1,049 dwellings per annum to calculate the housing land supply position and makes no adjustments for accrued undersupply. HDC is unable to demonstrate a five-year supply at any point in this calculation.
- 2.40 Table 3b adopts the same approach and then applies the Sedgefield approach to addressing accrued shortfall. Again, HDC is unable to demonstrate a five-year supply at any point, with the deficit deeper and more severe due to the significant scale of accrued shortfalls arising at each point.
- 2.41 In our submission, this the extent, duration and enduring nature of these shortfalls raises significant concerns regarding the soundness of the Local Plan.
- 2.42 We also consider that it is highly unlikely that this Local Plan will be adopted before 31st March 2027. In none of our calculations at Appendix 1 is HDC able to demonstrate a five-year housing land supply from 1st April 2027 onwards (even using its (untested) assumptions on delivery rates).

F. Headroom, resilience and the mitigation of risk

- 2.43 The starting point is that the HDC's total claimed supply of 15,430 dwellings already falls short of HDC's own housing requirement of 17,828 dwellings by 2,398 dwellings.
- 2.44 It goes without saying that a Plan which does not meet its own requirement does not provide any headroom, any resilience, and any opportunity to mitigate risk. If any of the assumptions made by HDC are incorrect and sites do not deliver as expected, the extent of shortfall, and the extent of housing supply deficit could be even greater.
- 2.45 The trajectory's resilience is also weakened by the fact that so much of the planned supply is concentrated in a small number of very large sites. If two or three of those strategic sites are delayed or deliver fewer homes than assumed at the same time, which is entirely plausible given that none have a detailed planning permission in place, the effect on the overall supply position would be very significant.

G. Whether the housing requirement should be stepped

- 2.46 HDC are proposing to phase the housing requirement so that the annual target is set at a much lower level in the early years of the plan, matching actual completions in Years 2023/24 and 2024/25, rising to 470 homes in 2025/26 and 734 in 2026/27 to 2029/30, before jumping sharply to 1,365 homes per year from 2030/31 onwards.
- 2.47 This approach is not justified.
- 2.48 HDC's reason for proposing the step is that water neutrality constraints held back housing delivery in the early years of the plan period and left the pipeline in a depleted state. However, an Inspector has recently found that there is no such constraint currently in place in Horsham District. That was the main justification for the stepped approach and it has fallen away. HDC have not put forward any other reason why the annual requirement should be reduced in the early years rather than applying a consistent target throughout the plan period.
- 2.49 As our Appendix 1 tables demonstrate, the use of a stepped trajectory is deployed solely to avoid a scenario where a housing supply shortfall can be avoided.
- 2.50 We also note (refer to our Matter 1 Statement) that HDC will need to begin Plan-making under the new system by the end of June 2026. That Plan will need to be prepared in the context of the latest LHN which is significantly greater than that proposed by the Council. It is perverse, in our submission, to proceed with a Plan, such as this draft version which is predicated on very low levels of housing development in the early years the Plan-period, when the message from Government is a clear that this is an area which should be planning for much higher levels of housing delivery.

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

- 2.51 HDC accept this themselves at paragraph 31 of the Topic Paper, acknowledging that more sites will be needed to meet their own housing need in full, to accommodate the unmet need from Crawley Borough Council, and to provide some level of headroom. However, the growth options HDC have put forward do not identify specific sites. They are broad scenarios without the site-by-site evidence needed to demonstrate that the required homes can actually be delivered. In short, more site allocations are clearly needed.
- 2.52 In the interests of sustainable development, it is our view that the unmet needs of Crawley should be met where that need arises.

**Appendix 1: Turley Housing Land Supply
Calculations (Excel file provided
separately)**

Turley Office
Reading

Turley

Horsham Housing Land Supply

Table 1 - Delivery as per HDC Trajectory

Source	Total	2023/2	2024/2	2025/2	2026/2	2027/2	2028/2	2029/3	2030/3	2031/3	2032/3	2033/3	2034/3	2035/3	2036/3	2037/3	2038/3	2039/4
Completions	772	452	320	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Commitments (made allocations/permissions)	8228	0	0	472	637	952	817	611	600	433	520	670	543	510	428	395	380	260
Strategic Site Allocations	3260	0	0	0	0	0	0	120	170	220	315	330	335	350	350	350	350	370
Smaller Site Allocations	1730	0	0	0	0	95	403	413	270	270	174	80	25	0	0	0	0	0
Windfalls	1440	0	0	0	0	0	120	120	120	120	120	120	120	120	120	120	120	120
Total HDC Supply	15430	452	320	472	637	1047	1340	1264	1160	1043	1129	1200	1023	980	898	865	850	750

Table 2 - Overall Plan Delivery (stepped trajectory as per Appendix 1 of JDCJB05)

	Total	2023/2	2024/2	2025/2	2026/2	2027/2	2028/2	2029/3	2030/3	2031/3	2032/3	2033/3	2034/3	2035/3	2036/3	2037/3	2038/3	2039/4
Requirement	17828	452	320	470	734	734	734	734	1365	1365	1365	1365	1365	1365	1365	1365	1365	1365
Cumulative Requirement		452	772	1242	1976	2710	3444	4178	5543	6908	8273	9638	11003	12368	13733	15098	16463	17828
Cumulative Supply		452	772	1244	1881	2928	4268	5532	6692	7735	8864	10064	11087	12067	12965	13830	14680	15430
Difference		0	0	2	-95	218	824	1354	1149	827	591	426	84	-301	-768	-1268	-1783	-2398

Table 2a - Associated Housing Land Supply (no provision for undersupply)

	Total	2023/2	2024/2	2025/2	2026/2	2027/2	2028/2	2029/3	2030/3	2031/3	2032/3	2033/3	2034/3	2035/3	2036/3	2037/3	2038/3	2039/4
Requirement	17828	452	320	470	734	734	734	734	1365	1365	1365	1365	1365	1365	1365	1365	1365	1365
5 year requirement (as of 01/04)		2710	2992	3406	4301	4932	5563	6194	6825	6825	6825	6825	6825	6825	6825	6825	6825	6825
plus a 20% buffer (as per the NPPF as the requirement is less than 80% of				4087	5161	5918	6676	7433	8190	8190	8190	8190	8190	8190	8190	8190	8190	8190
Annualised requirement				817	1032	1184	1335	1487	1638	1638	1638	1638	1638	1638	1638	1638	1638	1638
Forecast five-year supply				4760	5448	5854	5936	5796	5555	5375	5230	4966	4616	4343	3363	2465	1600	750
5YHLS				5.82	5.28	4.95	4.45	3.90	3.39	3.28	3.19	3.03	2.82	2.65	2.05	1.50	0.98	0.46

Table 2b - Associated Housing Land Supply (Sedgefield provision for undersupply)

	Total	2023/2	2024/2	2025/2	2026/2	2027/2	2028/2	2029/3	2030/3	2031/3	2032/3	2033/3	2034/3	2035/3	2036/3	2037/3	2038/3	2039/4
Requirement	17828	452	320	470	734	734	734	734	1365	1365	1365	1365	1365	1365	1365	1365	1365	1365
5 year requirement (as of 01/04)		2710	2992	3406	4301	4932	5563	6194	6825	6825	6825	6825	6825	6825	6825	6825	6825	6825
plus accrued shortfall				3406	4301	5027	5563	6194	6825	6825	6825	6825	6825	6825	7126	7593	8093	8008
plus a 20% buffer (as per the NPPF as the requirement is less than 80% of				4087	5161	6032	6676	7433	8190	8190	8190	8190	8190	8190	8551	9112	9712	9610
Annualised requirement				817	1032	1206	1335	1487	1638	1638	1638	1638	1638	1638	1710	1822	1942	1922
Forecast five-year supply				4760	5448	5854	5936	5796	5555	5375	5230	4966	4616	4343	3363	2465	1600	750
5YHLS				5.82	5.28	4.85	4.45	3.90	3.39	3.28	3.19	3.03	2.82	2.65	1.97	1.35	0.82	0.39

Table 3 - Overall Plan Delivery (flat requirement)

	Total	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Requirement	17833	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049
Cumulative Requirement		1049	2098	3147	4196	5245	6294	7343	8392	9441	10490	11539	12588	13637	14686	15735	16784	17833
Cumulative Supply		452	772	1244	1881	2928	4268	5532	6692	7735	8864	10064	11087	12067	12965	13830	14680	15430
Difference		-597	-1326	-1903	-2315	-2317	-2026	-1811	-1700	-1706	-1626	-1475	-1501	-1570	-1721	-1905	-2104	-2403

Table 3a - Associated Housing Land Supply (no provision for undersupply)

	Total	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Requirement	17833	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049
5 year requirement (as of 01/04)		5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245
plus a 20% buffer (as per the NPPF as the requirement is less than 80% of LHN)				6294	6294	6294	6294	6294	6294	6294	6294	6294	6294	6294	8190	8190	8190	8190
Annualised requirement				1259	1259	1259	1259	1259	1259	1259	1259	1259	1259	1259	1638	1638	1638	1638
Forecast five-year supply				4760	5448	5854	5936	5796	5555	5375	5230	4966	4616	4343	3363	2465	1600	750
5YHLS				3.78	4.33	4.65	4.72	4.60	4.41	4.27	4.15	3.95	3.67	3.45	2.05	1.50	0.98	0.46

Table 3b - Associated Housing Land Supply (Sedgefield provision for undersupply)

	Total	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Requirement	17833	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049	1049
5 year requirement (as of 01/04)		5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245	5245
plus accrued shortfall				6571	7148	7560	7562	7271	7056	6945	6951	6871	6720	6746	8395	8546	8730	7029
plus a 20% buffer (as per the NPPF as the requirement is less than 80% of LHN)				7885	8578	9072	9074	8725	8467	8334	8341	8245	8064	8095	10074	10255	10476	8435
Annualised requirement				1577	1716	1814	1815	1745	1693	1667	1668	1649	1613	1619	2015	2051	2095	1687
Forecast five-year supply				4760	5448	5854	5936	5796	5555	5375	5230	4966	4616	4343	3363	2465	1600	750
5YHLS				3.02	3.18	3.23	3.27	3.32	3.28	3.22	3.14	3.01	2.86	2.68	1.67	1.20	0.76	0.44