

HEARING STATEMENT

MATTER 2 – HOUSING SUPPLY AND HEADROOM

Horsham Golf and Fitness

Generator Group

April 2026

Carter Jonas

Date: April 2026

Client: Generator Group

Job Number: J0022406

Contacts: David Churchill (Partner) / Amon Yiu (Senior Planner)

One Chapel Place
London
W1G 0BG
T: 020 7518 3200

CONTENTS

1. INTRODUCTION	5
2. MATTER 2: HOUSING SUPPLY AND HEADROOM	6
1. The housing supply trajectory as proposed	6
2. The reliability of housing delivery assumptions / allowance for non-delivery	7
3. The reliability of assumptions about windfalls	7
4. The robustness of the trajectory	7
5. Maintaining adequate housing land supply including a rolling 5 year supply	7
6. Headroom, resilience and the mitigation of risk	8
7. Whether the housing requirement should be stepped	9
8. Whether additional housing allocations are required, and if so, of what kind / size / timing	10

1. INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Generator Group, the owner of the Horsham Golf and Fitness site. Generator Group has engaged in the Local Plan process to date and has sought to identify its concerns with the legal compliance and soundness of the draft Local Plan from the outset.
- 1.2 The Site has secured an outline planning permission which was allowed at appeal under reference APP/Z3825/W/24/3355546 in 2025 for the development of the site for a Sports and Leisure Hub including the provision of communal facilities, nursery and up to 800 dwellings.
- 1.3 Following the decision, the Site is currently identified within the housing trajectory (**HDCJB05a**) as a *“category B strategic site.”*
- 1.4 This Hearing Statement sets out our fundamental concerns in relation to the robustness of the Council’s housing trajectory. In particular, at this critical stage in the re-commencement of the examination, there remains a substantial lack of clarity as to how the identified shortfall in the housing pipeline under each of the three growth options will realistically be addressed.
- 1.5 While the principle for the Council’s decision to seek additional allocations is supported, priority should nevertheless be afforded to sites which have already secured planning permission, including the Horsham Golf and Fitness site.
- 1.6 The allocation of the Site would provide a clear and immediate opportunity to maximise development capacity on land that has been comprehensively tested through the planning process with unequivocal evidence of deliverability and suitability.
- 1.7 In light of the removal of water neutrality requirements, which previously constrained development quantum, there is no clear or compelling reason why the above could not now be considered as a practical and reasonable alternative, and it is untenable for not considering it. Failure to do so risks the inclusion of sites which have not been subject to the same level of planning scrutiny, thereby creating unnecessary uncertainty regarding the deliverability of new allocations at this late stage of the examination.

2. MATTER 2: HOUSING SUPPLY AND HEADROOM

1. The housing supply trajectory as proposed

- 2.1 The housing trajectory as currently drafted is fundamentally deficient and fails to identify a sufficient quantum of land to meet the District's housing requirements. The proposed supply of 15,430 dwellings is substantially lower than the stepped requirement of 17,828 dwellings, which will result in a shortfall of 2,398 dwellings.
- 2.2 While three growth options have been identified within the housing trajectory, only two options (i.e. Medium and High Growth Options) will be theoretically capable of satisfying the identified requirement in full. That said, there is a profound absence of evidence regarding the deliverability of these growth options, in particular the granular details as to how or when these additional units will realistically be delivered. In the absence of a detailed trajectory for these growth options, the Plan lacks the requisite certainty to be considered effective and positively prepared.
- 2.3 Further, the current Plan relies on only four strategic allocations to deliver 3,260 dwellings, which will only deliver approximately 21% of the total yield (3,260 of 15,430 dwellings). It is our concern that the Plan is disproportionately and passively reliant on existing permissions, which account for 53% of the total supply (8,228 dwellings). By leaning on past consents rather than making fresh, robust allocations, the Council is failing in its primary duty to proactively plan for the District's future growth.
- 2.4 It is highly questionable whether the Plan satisfies the requirements of Paragraph 23 of the NPPF, which states:

*“Strategic policies should provide a **clear strategy for bringing sufficient land forward**, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include **planning for and allocating sufficient sites** to deliver the strategic priorities of the area.”*

- 2.5 Of these allocated sites, one site provides a negligible capacity of only 60 dwellings, effectively leaving the Plan's heavy reliance on just three major allocations. This over-reliance on a small number of large-scale sites creates risks of delivery. Any delay in infrastructure delivery or planning determination on just one of these sites would result in a knock on failure of the District's housing supply.
- 2.6 Furthermore, the projected trajectory for these strategic allocations is overly optimistic. While two of the key strategic allocations (Land West of Ifield and Land West of Southwater) carry a combined expectation of 2,550 dwellings within the Plan period, neither site has secured even outline planning permission as of the opening of this Examination. Land West of Southwater remains at the earliest stages of the planning process, with the application only being validated in March 2026.
- 2.7 The Council's trajectory also assumes that these sites will first complete within three years of Plan adoption (by 2029/30), which is against the average lead-in period of 3.5 years as identified in the Horsham Housing Delivery Study Update (**H03**).
- 2.8 Given the lack of sufficient strategic allocations, we consider the Plan should not only identify additional allocations, but also prioritise sites have already secured planning permission, including the Horsham Golf and Fitness site.

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

- 2.9 The Housing Supply and Headroom Topic Paper (**HDCJB05**) acknowledges a significant historic non-delivery rate of 40% for small sites (comprising 1-4 units) (Paragraphs 16-17). This is, however, seemingly ignored within the Housing Trajectory (**HDCJB05a**) which appears to proceed on the optimistic assumption that 330 dwellings from small-site permissions will be delivered in their entirety.
- 2.10 Furthermore, no comparable non-delivery allowance has been applied to larger sites with existing permission and larger strategic sites to ensure the expected delivery is realistic. It is particularly significant in the context of the District's deteriorating delivery performance in recent years, with its Housing Delivery Test (HDT) results having plummeted from 147% in 2021 to 62% in 2023. In the absence of an adequate allowance the trajectory is overly optimistic.
- 2.11 With the inclusion of the above allowance, further allocations will be required to secure a robust delivery pipeline, and priority should therefore be afforded to sites that have secured planning permission with clear evidence of deliverability and suitability, including the Horsham Golf and Fitness site.

3. The reliability of assumptions about windfalls

- 2.12 No comment.

4. The robustness of the trajectory

- 2.13 Our concerns regarding the robustness of the trajectory have been set out in other sections of this representation.
- 2.14 It is our primary submission that the fundamental robustness of the housing trajectory cannot be established without a comprehensive and realistic review of delivery assumptions, alongside the identification of additional allocations. Crucially, the consideration of additional allocations should not be confined to the mere assessment of new small-scale or strategic sites.
- 2.15 Instead, to ensure the Plan is capable of being found sound and its ability to meet the identified housing requirement with sufficient headroom in full, it is imperative for the Council particularly at this juncture of the transitional arrangement to direct its focus toward the formal allocation of sites that have already secured planning permission.
- 2.16 Such an approach would not only provide a significantly greater degree of certainty regarding delivery but would also afford the Council a strategic opportunity to optimise and unlock additional capacity on consented sites which have already been tested and found deliverable and suitable through the planning process.
- 2.17 In the spirit of assisting the Council in securing a sound Plan for adoption, we would welcome the opportunity to work constructively and collaboratively with Council to explore potential opportunities at Horsham Golf and Fitness site.

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

- 2.18 The simple answer is no.
- 2.19 Even with a stepped trajectory in place, our assessment of the Council's housing trajectory at **Table 1** (on the basis of a supply of 15,430 dwellings against the stepped housing requirements) confirms that

Horsham will be unable to demonstrate a sufficient five-year supply of deliverable housing land immediately upon the Plan's adoption in 2027/2028.

- 2.20 The consequence of this failure is profound, as it implies that the Plan would from the very day following its adoption, fall within the ambit of Paragraph 11(d) of the NPPF, which immediately triggers the presumption in favour of sustainable development.

	23/24 - 27/28	24/25 - 28/29	25/26 - 29/30	26/27 - 30/31	27/28 - 31/32	28/29 - 32/33	29/30 - 33/34	30/31 - 34/35	31/32 - 35/36	32/33 - 36/37	33/34 - 37/38	34/35 - 38/39	35/36 - 39/40
Supply	2,928	3,816	4,760	5,448	5,854	5,936	5,796	5,555	5,375	5,230	4,966	4,616	4,343
Target	2,710	2,992	3,406	4,301	4,932	5,563	6,194	6,825	6,825	6,825	6,825	6,825	6,825
with 20% buffer	3,252	3,590	4,087	5,161	5,918	6,676	7,433	8,190	8,190	8,190	8,190	8,190	8,190
5YHLS position	4.5	5.3	5.8	5.3	4.9	4.4	3.9	3.4	3.3	3.2	3.0	2.8	2.7

Table 1 – 5YHLS Projections based on a supply of 15,430 dwellings against the stepped housing requirements

- 2.21 In the event where the Low Growth option is pursued, our assessment at **Table 2** confirms that, even on the optimistic assumption that the Council can identify additional allocations capable of immediate delivery upon adoption, Horsham remains incapable of demonstrating a five-year supply of deliverable housing land upon adoption.
- 2.22 To ensure the Plan is both effective and sound, it is imperative that the Council identifies additional allocations, in particular the consideration of those that have already secured planning permission, such as Horsham Golf and Fitness site. The existing planning permission serves as an unequivocal demonstration of the suitability and deliverable of the sites.
- 2.23 Furthermore, following the resolution of the water neutrality constraints that previously curtailed development scales within the District, there is now a significant opportunity to enhance the quantum of delivery on such consented sites and to support the Medium or High Growth options. In the spirit of assisting the Council in securing a pragmatic and legally robust mechanism for the examined Plan, we remain committed to constructive engagement with the Council to maximise the potential of this site.

	23/24 - 27/28	24/25 - 28/29	25/26 - 29/30	26/27 - 30/31	27/28 - 31/32	28/29 - 32/33	29/30 - 33/34	30/31 - 34/35	31/32 - 35/36	32/33 - 36/37	33/34 - 37/38	34/35 - 38/39	35/36 - 39/40
Low Growth	5,235	5,235	5,235	5,235	5,235	5,235	5,235	5,235	5,235	5,235	5,235	5,235	5,235
target	2,710	2,992	3,406	4,301	4,932	5,563	6,194	6,825	6,825	6,825	6,825	6,825	6,825
with 20% buffer	3,252	3,590	4,087	5,161	5,918	6,676	7,433	8,190	8,190	8,190	8,190	8,190	8,190
5YHLS position	8.0	7.3	6.4	5.1	4.4	3.9	3.5	3.2	3.2	3.2	3.2	3.2	3.2

Table 2 - 5YHLS Projections based on the low growth option against the stepped housing requirements

6. Headroom, resilience and the mitigation of risk

- 2.24 As demonstrated above, the current supply trajectory of 15,430 dwellings results not merely in an absence of headroom, but in a substantial shortfall of 2,398 dwellings. There is no reference within the draft Plan as to how this deficit is to be remediated, which fundamentally undermines the effectiveness of the draft Plan.
- 2.25 Furthermore, the omission of any allowance for headroom indicates a failure to account for inherent delivery risks, which are often observed for the delivery of strategic sites. The Plan will therefore lack the requisite resilience against contingencies and will inevitably exacerbate the risk of falling below a rolling five-year housing land supply.
- 2.26 The above risk should be viewed in the context where the current Infrastructure Delivery Plan (**SP04**) is being produced on the assumption of the superseded housing target of 777 dpa (or 13,212 homes). No revised evidence or updated timescales have been submitted to demonstrate that sufficient

infrastructure will be delivered to support the revised trajectory of 907 dpa (15,430 dwellings), nor for any of the three growth options requiring a minimum of 1,047 dpa. This leads to a lack of assurance that infrastructure constraints will not frustrate delivery.

- 2.27 While three growth options have been proposed to ensure the need for resilience, no evidence has been provided to demonstrate how an annualised trajectory of 1,047 to 1,182 dwellings can be secured to ensure the headroom is actually robust and deliverable.
- 2.28 Even if the projections underpinning the various growth options were robust, the Low Growth option will still nonetheless result in a shortfall of 80 dwellings (on the basis of a supply of 17,800 homes against the requirement of 17,828 dwellings) even under the optimistic assumption that the projected quantum is capable of being delivered in full. As such, the Low Growth option fails to provide the necessary resilience and cannot, therefore, be identified as a sound basis for the Plan.
- 2.29 Given the uncertainty surrounding the trajectories for the three proposed growth options, the direct consequence will be that the draft Plan will de facto deliver only 15,430 dwellings (907 dpa). In such a scenario, the Plan would satisfy no more than 68% of the December 2025 Standard Method figure (1,338 dpa). This represents a profound shortfall against the 80% threshold required by Paragraph 234(b) of the NPPF. Such a deficit of this magnitude will be beyond the reach of any pragmatic remediation and will be a fundamentally different proposition than the 78% position asserted by the Council in **HDCJB04**.
- 2.30 In mitigating such a profound risk of soundness, we strongly urge the Council to engage cooperatively with developers to identify further allocations, with priority afforded to those sites that have been secured planning permission, including the Horsham Golf and Fitness site.

7. Whether the housing requirement should be stepped

- 2.31 In the context where the Government is fully committed to delivering 1.5 million homes by the end of this Parliament, and that water neutrality no longer serves as a constraint to development within the District, we do not consider that the proposed stepped housing requirement is fully justified as the direct consequence of such an approach is the unnecessary deferral of identified development needs.
- 2.32 We maintain that the Plan should, as a matter of principle, proceed on the basis of a flat housing requirement, supported by a commitment to secure additional allocations as far as possible to genuinely boost supply in the early years of the plan period. A stepped housing requirement should only be used as a last resort once it has been proven that no further allocations can be identified and a flat requirement is, therefore, demonstrably unachievable.
- 2.33 Indeed, as section 5 clearly demonstrates, even if the stepped housing requirement were to be considered as a pragmatic approach, it fails to serve any practical purpose in securing a sufficient five-year supply of deliverable housing land to mitigate the risk of triggering the presumption in favour of development upon adoption even in the short term prior to the transition to the new plan under the revised regulations. Such a deficit unequivocally indicates the failure of the current Plan in identifying a sufficient trajectory of deliverable sites, a failure which persists regardless of the methodology applied to the housing requirement.

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

- 2.34 Yes, additional housing allocations are a prerequisite for the Plan to satisfy both the District's identified housing need and the unmet needs of neighbouring authorities. To ensure a sound Plan, a meaningful degree of 'headroom' or contingency is essential to provide resilience against unforeseen delivery constraints.
- 2.35 While the two options set out at Paragraph 32 of **HDCJB05** (the inclusion of further small-scale and strategic sites) may be acceptable in principle, both paths introduce fresh uncertainties in relation to the deliverability and suitability of the identified sites, which will risk undermining the pragmatic and timely adoption of the Plan at this critical juncture.
- 2.36 As such, the central tenet of this representation is that the Council should reconsider those sites that have already secured planning permission, with a view to unlocking additional capacity on those sites where suitability for development has already been established, including the Horsham Golf and Fitness site. This is of particular significance now that the water neutrality requirements, which previously constrained the scale of the consented sites, have been formally withdrawn, which provides a clear change in circumstances and enables immediate opportunity to accommodate additional growth.
- 2.37 The formal allocation of these land parcels with an enhanced quantum does not constitute the promotion of "omission sites". Instead, it represents the logical completion of an allocation process already initiated by the Council. In this context, we would respectfully request the Inspector to include those consented sites, including the Horsham Golf and Fitness site, as part of the scope of main modifications to the submitted Plan rather than as a new omission site requiring separate consideration.

