

MM142 – Housing requirement and delivery

CPRE Sussex considers MM142 unsound because it has not been demonstrated that the proposed housing requirement and associated supply trajectory are realistically deliverable, or that they provide sufficiently robust and timely delivery to maintain an effective five-year housing land supply.

MM142 identifies a minimum housing requirement of 18,712 dwellings over the plan period and a projected supply of 20,915 dwellings. Given Horsham District's recent record of under-delivery, substantial reliance on large strategic sites and the inevitable risk of delay and slippage, adequate contingency is indeed necessary.

The issue is therefore twofold: whether the 18,712-dwelling requirement and the trajectory needed to deliver it have been shown to be realistically achievable, and whether the proposed additional supply provides sufficiently reliable and timely delivery headroom.

TOTAL HOUSING REQUIREMENT AND MARKET CAPACITY

The fundamental concern is that it has not been demonstrated that a housing requirement of 18,712 dwellings, and the substantially higher delivery trajectory necessary to provide the proposed headroom, is realistically achievable within Horsham District's housing market.

Horsham's own local housing need is 14,071 dwellings. The proposed requirement then adds 3,757 dwellings to meet half of Crawley's unmet need and 884 dwellings for unmet need from Adur and Worthing, producing the total requirement of 18,712. The Crawley contribution alone increases Horsham's own requirement by 26.7%; the combined unmet-need contributions increase it by about 33% (HDCJB20, paras 1.14-1.18).

CPRE Sussex recognises that the Inspector has concluded that the Plan should address half of Crawley's unmet need. However, identifying a need to be accommodated does not itself demonstrate that the Horsham housing market has the capacity to deliver the resulting trajectory. That question is particularly important because the Housing Delivery Study is expressly a test of deliverability in market-capacity terms (HDCJB20, paras 1.1-1.3).

HDC's own evidence illustrates the scale of the step change required. The [iceni July 2026 Horsham Housing Delivery Study's](#) adjusted trajectory averages 1,225 completions per annum over the plan period and peaks at 1,774 homes in 2033/34. For the seven-year period 2028-35, average delivery is expected to reach 1,595 homes per annum. [The Study](#) records that this is 46% above the 1,089 homes per annum achieved in Horsham during 2015-20 and above the District's historic annual peak of 1,369 homes (HDCJB20, paras 4.7-4.8).

The Housing Delivery Study concludes that the 2028-35 growth rate would be challenging but not necessarily unrealistic, drawing partly on examples from other high-growth authorities and an assumed degree of pent-up demand. It also describes the full plan-period housing requirement as being at the upper end of the long-term range seen in comparator authorities (HDCJB20, paras 4.9-4.11). CPRE Sussex considers that this evidence demonstrates the

challenge but does not remove the need for a robust assessment of whether demand in Horsham can sustain the required sales and build-out rates over such a prolonged period.

This concern is reinforced by current market evidence. The Housing Delivery Study reports that annual residential sales in Horsham have generally declined and are now at levels similar to 2010/11 during the credit crunch; new-build sales have fallen even more sharply. It also records affordability pressures and increasing use of developer incentives to maintain sales rates (HDCJB20, paras 2.37-2.49). Nationally, housing starts fell sharply after 2022 and the [Study](#) identifies a clear prospect that completions could remain low for several years (HDCJB20, paras 2.9-2.14).

Housing delivery is affected by economic conditions, mortgage availability and interest rates, household incomes and affordability, construction and labour costs, buyer confidence and the rate at which developers can sell completed homes. These factors are substantially outside the control of the local planning authority. Allocating additional land can increase potential supply, but it does not by itself create additional purchasers or guarantee higher aggregate build-out rates.

Water neutrality provides a local example of how an external constraint can disrupt an apparently reasonable trajectory. [The Housing Delivery Study](#) records that water neutrality significantly constrained permissions and left the District with a weak development pipeline; only 328 homes were delivered in 2024/25 and provisional delivery for 2025/26 was 235. Although the water-neutrality requirement has now been withdrawn, [The Study](#) states that its effects remain evident in the weak pipeline (HDCJB20, paras 1.6-1.8 and 2.17-2.20). Moreover, water availability remains a strategic risk and remains the subject of a separate CPRE Sussex representation on this Main Modification.

CPRE Sussex therefore considers that the effect of importing unmet need on the deliverability of the District-wide housing requirement should be quantitatively assessed. If the evidence cannot demonstrate a realistic prospect of sustaining the required level of delivery, the scale of unmet need accommodated from outside Horsham District should be reconsidered rather than assuming that additional allocations will necessarily produce additional completions.

DELIVERY RISK

The Housing Delivery Study identifies significant challenges in achieving the proposed trajectory. Delivery must increase sharply from current levels and remain at historically high rates for a sustained period. [The Study](#) ultimately describes the trajectory as 'challenging but deliverable from a market capacity perspective', while identifying measures needed to reduce delivery risks (HDCJB20, paras 5.16-5.17).

This matters because a significant proportion of future supply depends upon large strategic sites with long lead-in periods, substantial infrastructure requirements and exposure to market absorption constraints. Overall, numerical capacity extending to 2040 is not equivalent to a robust supply of homes at the times when they are required.

The Council's August 2026 Housing Trajectory and Five-Year Housing Land Supply Update expects a five-year supply to be demonstrated for seven years following adoption. Its own indicative table then shows the rolling supply declining to 5.1 years in 2032/33 and below five

years thereafter. This underlines the importance of delivery performance and early review rather than reliance on the plan-period total alone (HDCJB22, paras 1.1-1.3 and Table 1).

The distinction has become particularly important following publication of the revised National Planning Policy Framework on 17 August 2026. Although its new plan-making provisions do not apply to this examination, its decision-making provisions apply to planning decisions immediately from publication.

Policy S5(1)(j) expressly recognises housing development addressing an evidenced unmet need where an authority cannot demonstrate a five-year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test. Annex D additionally requires a 20% buffer, effectively requiring a six-year housing supply, where delivery over the previous three years is below 85% of the housing requirement.

Horsham's latest published Housing Delivery Test result is 44% (2024-25). The District is therefore already exposed to these provisions.

The new Framework also reinforces the importance of genuine deliverability. For major sites which are allocated but do not yet have detailed planning permission, they should only be considered deliverable where there is clear evidence that homes will be delivered on-site within five years.

Consequently, adoption of a Local Plan containing sufficient overall numerical capacity would not, of itself, protect the District from speculative development. HDC must therefore be able to demonstrate sufficient deliverable supply on adoption, including the applicable buffer, and a sufficiently resilient trajectory thereafter.

Moreover, the proposed headroom is disproportionately dependent on one strategic site whose timely delivery is uncertain. Land at Adversane accounts for approximately 65% of the numerical margin above the minimum housing requirement, yet HDC's own evidence identifies a lengthy lead-in and build-out extending well beyond the plan period. CPRE Sussex details these risks in its representation on MM227Land at Adversane.

The Plan's delivery resilience is therefore weakened by relying so heavily on a large strategic site whose contribution is concentrated later in the plan period.

EARLIER DELIVERY SHOULD BE PRIORITISED

CPRE Sussex considers that HDC should examine whether a greater proportion of the required headroom can be provided through earlier, more diversified and independently evidenced delivery.

This does not necessarily require additional overall development. It requires greater attention to the timing and certainty of the existing and proposed supply.

In particular, opportunities should be fully explored to accelerate delivery from existing permissions before relying upon additional late-stage strategic allocations. The SA's own appraisal supports the principle of testing earlier delivery from smaller sites (HDCJB13, para 2.3.10).

Given the importance of rebuilding Horsham's short- and medium-term housing pipeline, the potential should be robustly tested before the Plan relies upon a new settlement with a substantially later delivery profile to provide much of its numerical contingency.

Even a relatively modest shift of delivery into the earlier years could be more valuable in maintaining a five-year supply than equivalent nominal capacity delivered towards the end of the plan period.

MAINTAINING THE PLAN-LED SYSTEM

This is not an argument for artificially constraining housing delivery. The concern is that failure to deliver the proposed trajectory would have consequences extending beyond the numerical housing shortfall. Under the new NPPF decision-making framework, continuing HDT failure or inability to demonstrate the required five-year supply would expose the District to speculative [unplanned-for](#) development.

That outcome would undermine the central purpose of preparing a Local Plan: to determine through a democratic, evidence-led process where development should take place and to coordinate that development with the infrastructure, environmental mitigation and community facilities it requires.

A housing strategy intended to restore the plan-led system should therefore be designed not merely to contain sufficient overall capacity, but to provide resilient delivery throughout the plan period.

CPRE Sussex asks

CPRE Sussex asks that MM142 and the associated housing trajectory be modified or supplemented to:

- 1. Demonstrate that the 18,712-dwelling housing requirement and the associated trajectory are realistically deliverable**, including a quantitative assessment of market capacity and the effect of accommodating unmet need from outside Horsham District.
- 2. Reconsider the scale of unmet need accommodated from outside the District if that assessment cannot demonstrate a realistic prospect of sustaining the required delivery rates**, rather than assuming that additional allocations will necessarily result in additional completions.
- 3. Retain adequate headroom** above the basic housing requirement, (18,712 dwellings) and **demonstrate that this is deliverable**, supported by clear site-specific evidence of planning status, infrastructure dependencies, anticipated first completions, realistic annual build-out rates and market capacity.
- 4. Demonstrate that the Plan provides a deliverable five-year housing land supply on adoption, including the applicable buffer**, and a sufficiently resilient trajectory thereafter to provide reasonable confidence that a five-year supply can be maintained.
- 5. Reduce disproportionate reliance on a small number of large strategic sites for delivery contingency**, particularly where those sites have long lead-in periods or significant infrastructure and market-absorption risks.

6. Accelerate delivery from existing permissions, including through infrastructure investment, multiple development partners and tenure diversification, before relying upon additional late-delivering strategic allocations or additional new allocations.

7. Introduce proactive monitoring and clear early-review triggers linked to the housing trajectory, five-year supply and Housing Delivery Test performance, with **an explicit plan-led contingency mechanism** identifying how additional supply would be brought forward if required.

SUSTAINABILITY APPRAISAL

The Sustainability Appraisal Addendum reinforces CPRE Sussex's concern about the timing and resilience of housing delivery. It supports a 'clear case for boosting supply in the earlier years of the plan period' with a view to a less stepped requirement and/or greater headroom so that the requirement is delivered and a five-year housing land supply can be maintained (HDCJB13, para 2.3.10).

Despite this, the SA concludes that the significantly higher total plan-period supply gives confidence in the ability to deliver the housing requirement, while acknowledging that the requirement is 'heavily stepped' and that the Housing Delivery Study considers it 'challenging but deliverable' only from a market-capacity perspective (HDCJB13, para 2.3.13). CPRE Sussex considers that this conclusion does not adequately distinguish aggregate plan-period capacity from the timing and certainty of actual delivery.

The SA therefore identifies the relevant delivery risk but does not clearly demonstrate how the selected strategy resolves it. Before concluding that the proposed strategy is justified, HDC should demonstrate that the trajectory provides sufficient early and medium-term resilience and that reasonable opportunities to diversify delivery and strengthen earlier supply have been adequately tested.

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