

By email

04 February 2026

Dear Mr Bore,

Examination of the Horsham District Local Plan

Thank you for taking on the examination of the Horsham District Local Plan. The Council recognises that whilst there has been a change in the Inspector examining the plan, many of the issues raised by Mr Fleming are matters which you will also wish to consider when determining the next steps for the examination of this plan. This letter therefore provides an update on the Council's housing land supply and an outline of a project plan for the recommencement of the Examination. We trust that this will be of assistance to you.

Housing Supply update

Housing Need to 2040

The Horsham District Local Plan is being examined under the September 2023 NPPF. The housing need for Horsham District at the point of submission of the plan in July 2024 was 911 homes per year, or 15,487 over the plan period. The South Downs National Park (SDNP) have recently updated evidence on their own housing need. HDC agrees with the National Park's calculation that 2.3% of Horsham District's homes sit within the SDNP boundary –. Apportioning this 2.3% figure to the standard housing method calculation for Horsham (NPPF, September 2023) gives a need figure of 21 dwellings per annum within the SDNP leaving a need of 890dpa to be met by Horsham District. This reduces the local housing need figure to **15,130** over the plan period.

It is recognised that within this plan, the Council needs to consider the extent to which it can contribute towards meeting the unmet housing needs arising from Crawley Borough. The total unmet needs arising from Crawley as set out in their adopted local plan is 7,506 homes for the period to 2040.

During the examination of the adopted Horsham District Local Plan (known as the Horsham District Planning Framework), the Local Plan Inspector Mr Geoff Salter, established a principle that in respect of Crawley Borough's unmet needs 'on a very

rough basis it seems reasonable for Horsham to try to accommodate roughly half this number'.¹

Given the requirement for this Council to commence plan making under the new planning regulations later in 2026, there will be a continued need to consider the housing needs arising from Crawley. Given this, it is considered that it remains pragmatic to continue to consider the extent to which HDC can accommodate half of Crawley's unmet needs. In the period to 2040, this equates to some 3,753 homes. This would take the total housing need over the plan period to **18,883 homes**. For the avoidance of doubt it should be noted that figure does not include any additional 'headroom' which may be necessary to ensure that any agreed housing figure can be delivered over the plan period.

Housing Supply Update

Since the point of submission, the housing land supply position has inevitably changed, taking account of both housing completions and new permissions. The Council has therefore undertaken a review of additional permissions and completions up to the 31 January 2025. In addition, the Council has written to the site promoters of the sites proposed for allocation within the submitted Horsham District Local Plan. The purpose of this letter was to request an update on the anticipated housing delivery rates, based on the most up to date market conditions, and following the removal of the need for any water neutrality mitigations.

Following a review of this information by officers, the total housing supply has been updated. The total shortfall position for the period to 2040 is currently estimated at **408** to meet the Council's own housing need and **4,161** to meet its needs and half of Crawley's. Further detail is set out in Appendix A.

The Council will continue monitoring housing permissions (which it does on an ongoing basis in any event) and if necessary will be able to report updates to the housing supply position at points through the examination of the plan.

Programme of Works

Horsham District Council is fully cognisant of the fact that there is a significant level of work required to consider how the shortfall in housing numbers could be addressed. In particular, we are very mindful of the letter dated 30 July 2024 from the Minister of State Matthew Pennycook to the Chief Executive of the Planning Inspectorate (ID02) which advises that pauses to examinations to address soundness issues should not normally take longer than six months to enable this additional work to be completed. We do however also note the further letter from the Minister highlighting that where plans are

¹ https://www.horsham.gov.uk/_data/assets/pdf_file/0006/141585/Horsham-District-Local-Plan-2015-Inspectors-Report.pdf - paragraph 40.

capable of being made adoptable, this should be sought through the Examination process².

Given that the plan has already been stalled for over 12 months, it is therefore imperative for the Council as much as the Government that any additional work is undertaken effectively and expediently. The Council is also, however, acutely aware that any such programme of works must also be realistic taking account of any potential external and internal interdependencies, the level of available resourcing in terms of staffing, any consultancy support and the available budget. In undertaking this programme of works the Council has therefore engaged with the Planning Advisory Service to provide an independent 'sense check' to ensure that the programme is as realistic as possible.

A provisional work programme is attached as a schematic in Appendix B. In addition, further discussion is set out in the paragraphs below.

Identification and Consideration of Additional Sites.

Since Plan preparation commenced, a very considerable number of sites have been proposed to the Council as potential development sites. The outcome of the site assessment work was published at both Regulation 18 (Examination Document CD01) and Regulation 19 (Examination Document H11) and are therefore already in the public arena. The sites have also been discussed with Parish Councils in workshops held in September 2023. Further detail on the Council's consultation processes on potential sites is set out in the Council's Statement of Consultation (SD11a – SD11d).

An initial review of H11 has been conducted. Whilst some sites within these documents are either already allocated or have since been granted planning permission, there are around 100 additional sites within H11 which in the Council's judgement can be revisited at pace. There is also some prospect of densification on some existing housing sites within the district.

In summary however, the key sites to be revisited comprise Strategic Sites (H11, Part B) with the remainder being smaller sites (H11 Part D). Given the total volume of sites already before the Council, it is not considered a further call for sites is necessary to identify further sites to address the housing supply shortfall. The Council has this year already written to the promoters of these sites (on a without prejudice basis) to seek any key updates, particularly in their anticipated delivery timescales. This information has now been received and the Council is therefore in a position to undertake the necessary updates. Furthermore, whilst it appears that there is a relatively high number of sites to

revisit, the Council is not starting with a ‘blank slate’ in terms of its understanding and knowledge of these sites and is therefore able to complete this review at pace.

Identification of Reasonable Alternatives

From the initial feedback on housing delivery trajectories by the site promoters, the Council has been able to identify a number of potential high level alternative growth options which can be tested through the further work undertaken by the Council. Whilst a proportion of the extra growth can be delivered through additional smaller scale allocations, to meet housing need the Council will be required to allocate additional strategic sites. The headline options are set out below, together with an indication of the total housing delivery that could come forward in the plan period. The variance below results from the precise combination of different sites.

Option	Indicative housing supply to 2040
Low Growth: One additional strategic site allocation	17,100 to 17,800
Medium Growth: Two additional strategic site allocations	18,600 to 19,300
High Growth: Three additional strategic site allocations	20,100

Sustainability Appraisal

The Council has been in discussions with consultants to ensure that the necessary updates to the Sustainability Appraisal can be undertaken. The consultants have confirmed that they have good availability, such that they can complete the work required at pace, and within the identified 6-month timeframe, based on the broad options set out above. These discussions are well progressed with procurement and contractual matters being put in place so that work can commence with immediate effect if it is agreed that the Examination can proceed. It should be noted that Sustainability Appraisal is an iterative process which would continue throughout the period of additional work.

Transport

HDC is reliant on specialist transport consultants to undertake the necessary transport modelling that is necessary to support the identification and allocation of further sites. The Council has a longstanding relationship with a well reputed transport consultant team, who have confirmed that they have good availability such that they can complete the work required at pace, and within the identified timescales. They have a proven track record of being able to deliver to tight timescales previously set by the LPA during

plan preparation, and the timescales set out in the work programme are therefore based on the Council's experience of these suppliers. Discussions are taking place in relation to procurement and contractual matters to ensure that the work can commence immediately upon confirmation that the Examination can proceed.

The Council is aware that the timing and outcome of the transport modelling is a key dependency in relation to the entire local plan programme, in terms of feeding into discussions on infrastructure delivery mitigation measures and timing and also may be a prerequisite to the necessary completion of the Habitat Regulations Assessment to support the Plan. This has therefore been factored into the timing of both these pieces of work. It should also be noted that the Council's transport and Habitat Regulations Assessment consultants (who have also confirmed their availability to complete the necessary evidence base updates) have also previously worked together on our Local Plan and have established professional relationships.

Infrastructure Delivery

Two key aspects of infrastructure delivery that are expected to play a central role in the review and update of the plan, concern when and how new secondary schools will be provided, and the scale and timing of any necessary highway mitigation measures.

Horsham District Council already has established relationships with a range of infrastructure providers and is in regular dialogue with West Sussex County Council (WSCC) who are both the education and highway authority for the area.

With respect to the additional work required to update the Local Plan, HDC has already met with WSCC to discuss the next steps with regards to the testing of the potential options for growth set out above. The Council has also sent requests for information to a number of other key infrastructure providers and engagement is live and ongoing.

The Council's work programmes indicate that the Infrastructure Delivery Plan can be completed by the end of June. This reflects that discussions related to infrastructure are often highly iterative in nature, and that the Council has been engaging with providers on different scales of and locations for development throughout the preparation of the plan. The timescales set out in the work programme are however based upon previous experience of working with our key stakeholders and knowledge of the timeframes in which they have previously responded to the Council. It is therefore considered to be realistic.

Other evidence base updates

In addition to the key workstreams identified above, it is recognised that there are other matters which will need update and review. These are summarised below:

Housing Delivery Update – In ensuring that its eventual Strategy is sound, the Council recognises that the sites which are allocated in the plan must be deliverable over the course of the plan period. In addition to the other considerations set out in this report, the Council also considers that it will be necessary to consider what if any impact market absorption issues may have on the potential to allocate significantly more growth over more development locations within the District. The Council has approached its technical consultants on this matter, who have confirmed their availability and ability to update this work in a timely manner.

Viability - The Council is aware that the viability of the plan will need to be updated and reviewed. It has approached its existing consultants who have previously undertaken this work efficiently and to a high standard. They have confirmed their current availability to undertake the further work required. The timescales for this work are therefore based upon previous work that they have undertaken. It should also be noted that the viability work to date has indicated generally good margins of viability across the district and across site typologies. Viability issues are therefore not expected to impact on updates to policies within the Plan.

Employment Needs – An in-house update to the Council's most recent position on Employment provision has been identified as necessary. The proposed output is a topic paper to update the most recent position (e.g. any sites lost to residential / other development, assess remaining headroom). This will take into account the Economic Growth Assessments (Examination Documents EC01 and EC02) which both presented three scenarios including a future labour supply scenario that tested higher levels of housing growth above the standard method requirement (1,200dpa and 1,400dpa). It should however be noted that the submitted local plan provided for a greater than identified level of employment growth to enable choice in the market. There is potential for the allocation of any additional strategic sites are to include land for employment, and therefore there is potential for any additional provision to be sustainably met.

Policy Writing

It is considered that there are two pieces of work which would be required in respect of policy writing and updates. The first element is a review of the existing submitted policies in light of factual updates/changed circumstances (such as the removal of permitted and / or built out allocations from the plan). In addition, and to ensure

longevity of the plan it is considered that it will also be necessary to review the policies in light of the emerging NPPF and make any necessary updates and modifications in this respect. This is the first half of the policy writing workload in the project plan.

The second stage is drafting policies for new housing allocations, based on the outcome of the additional work that is undertaken. It is considered that there are tried and tested formats for such allocations which the Council would follow and this is therefore a piece of work which could be completed towards the end of the identified work programme but within the required timescales.

Potential Timing of Hearings

In addition to the requirement to undertake additional evidence base work it is recognised that there will be a need to ensure that stakeholders continue to be able to have their input into the Examination of the plan both as part of hearings and through a main modifications consultation. In preparing its work programme, the Council has therefore been mindful of these requirements. At this stage it is suggested that it may be appropriate to divide any hearings into two separate phases. It is considered that it would be appropriate for the first phase to consider the Council's housing requirement and supply. This would then be followed by the completion of the Council's evidence base and allow a main modifications consultation to take place over the summer. This would enable the second phase of hearing to commence in September 2026. We do however recognise that the Council's dates are provisional and are dependent on your views, together with practical considerations such as your availability to conduct the hearing sessions.

Resourcing and Budgetary Implications

The Council is aware that the proposed timetable that it has put forward may appear ambitious. It is however important to highlight that the production and adoption of the Local Plan is a corporate priority. This is reflected in the governance arrangements for the progression of the Local Plan. This includes Chief Executive and director level representation on the Project Board.

A key aspect of ensuring the progression of the plan is to ensure sufficient staffing resource available to enable the delivery of this priority. The Planning Policy Team is well resourced with the equivalent of eight full time officers who can dedicate their time to plan production. The staff are highly qualified and experienced officers and have a proven track record in being able to work at pace.

From a budgetary perspective, the Council has ensured that adequate budgetary provision has been made in both this and the next financial year. This is kept under review through monthly budget monitoring.

Conclusions

It is considered that the work programme set out above is, whilst relatively ambitious, also realistic. Whilst the work programme set out above is a best case, the dependencies which are outside the Council's direct control have been sought to be minimised through early engagement with consultants, together with past experience of working with those organisations who are familiar with the potential strategic allocation sites. We would however be happy to discuss these issues with you in more detail to answer any further questions or queries that you may have.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C Howe', written in a cursive style.

Mrs Catherine Howe

Head of Strategic Planning
Horsham District Council