


**Horsham District Council Local Plan
Examination
Hearing Statement for Matter 1**

March 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 1: The Housing Requirement' 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.
 - 1.3 As the Inspector (and HDC) will be aware from their earlier representations, A2Dominion is promoting an area to the west of Pease Pottage within Horsham District for a residential development which is capable of helping to address the District's own needs, as well as those unmet housing needs arising from the neighbouring authority of Crawley Borough. This scheme is referred to by A2Dominion as 'Cottesmore Village'.
 - 1.4 The 'Cottesmore Village' proposition has the potential to accommodate a strategic scale of residential development, with a variety of house types and sizes. This scheme also has the potential to meet the needs of a broad group in the community, including those of older people and those in need of care. This broader proposition has the potential to provide supporting facilities, including a local centre and a new primary school for example.
 - 1.5 A2Dominion has consistently maintained in its representations and contributions to examinations, to this Local Plan, as well as to the recently adopted Crawley Borough Local Plan and, as the Inspector will be aware the draft Mid Sussex Local Plan (currently at examination), that there are significant unmet housing needs arising from Crawley and that those needs should be met close to where they arise.
- A2Dominion**
- 1.6 A2Dominion is a residential property group and award-winning housing developer. They pursue their business with a social purpose, reinvesting profits from private sales into building new affordable homes, managing existing homes and supporting local communities. They deliver on all tenures on their development sites, retaining a long-term interest via the ownership and management the affordable housing and open areas.
 - 1.7 A2Dominion's vision is to improve people's lives through high-quality homes and services. A2Dominion has over 38,000 homes across London and southern England and are committed to developing new homes that are genuinely sustainable.

2. Response to Matter 1: The Housing Requirement

A. The Identification of the Appropriate Basic Local Housing Need Figure for the Purposes of the Plan

- 2.1 The starting point for identifying local housing need is the Government’s Standard Method, as set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 2.2 The NPPF published in December 2023 contained transitional arrangements for plan-making (paragraph 230, Annex 1) which apply to the Horsham District Local Plan 2023-2040 (“HDLP”), having reached Regulation 19 (submission) stage before 19 March 2024. Therefore, the HDLP is being examined under the September 2023 version of the NPPF and as such the Standard Method calculation in effect at that point applies.

- 2.3 The PPG is clear (at paragraph 8) that:

“When should strategic policy-making authorities assess their housing need figure for policy-making purposes?”

Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.

However, local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination

Paragraph: 008 Reference ID: 2a-008-20241212

Revision date: 12 12 2024”

- 2.4 This is consistent with the previous iteration of the PPG (paragraph: 008 Reference ID: 2a-008-20190220 Revision date: 20 02 2019).
- 2.5 The HDLP was submitted in July 2024 and the housing need at that time, based on the Standard Method was 911 dwellings per annum. It is not yet two years since the Plan was submitted, but it is accepted that this point will arrive shortly (this July).
- 2.6 Horsham District Council (HDC) has published a Housing Requirement Topic Paper (HDCJB04) which sets out the Council’s position on the housing requirement for the submitted HDLP and proposes a revised approach to this.

- 2.7 The Housing Requirement Topic Paper sets out that that the Standard Method derived housing need figure for Horsham should be reduced by 2.3% to reflect the proportion of the District that lies within the South Downs National Park (SDNP). This has come about as a result of the SDNP Authority updating its evidence base on housing need as part of its Local Plan review.
- 2.8 Furthermore, the Housing Requirement Topic Paper sets out that it was acknowledged during Mid Sussex District Council's (MSDC) reopened Local Plan hearings that it in the context of both HDC and MSDC dealing with unmet need from neighbouring authorities a consistent approach to calculating housing need and unmet need would be beneficial. The Inspector for MSDC concluded that they should proceed on the basis of a requirement calculation which applies the relevant affordability ratio for preceding years and the latest affordability ratio as a basis for 2025/26 onwards. In the Housing Requirement Topic Paper HDC have applied the same approach having regard to the need for consistency.
- 2.9 The table below sets out how HDC have calculated the housing need over the plan period having regard to the above.

Year of Plan	SM Baseline	2.3% for SDNPA	Total HDC Need
2023 x 1 year	911	21	890
2024 x 1 year	917	21	896
2025 x 15 years	838	19	819
Plan Period Housing Need	14,398	327	14,071

- 2.10 We disagree with the proposed approach. Firstly, the proposed reduction to Horsham District's housing need on the basis of the proportion of the district within the SDNP is not justified at this stage, as it relies on the assumption that the SDNP Authority will accommodate the relevant need within its emerging Local Plan. Given that the SDNP Local Plan review has not yet reached Regulation 19 stage and its policies and site allocations remain subject to refinement, there is insufficient certainty that the identified need arising from the Horsham portion of the National Park will be met in full. In the absence of a robust and deliverable strategy, it would be premature to apply a reduction, and Horsham's housing requirement should therefore not be adjusted on this basis.
- 2.11 Secondly, the PPG is clear that, once established, the housing need figure used to inform a plan may be relied upon for a period of up to two years. This approach reflects the importance of stability and consistency in plan-making, particularly during the examination process.
- 2.12 In this context, it is not appropriate for Horsham District Council to seek to reduce its housing requirement solely on the basis that a more recent iteration of the Standard Method would generate a lower figure than that used at the point of submission.
- 2.13 Allowing such a reduction would undermine the plan-led system by:

- Introducing uncertainty into the examination process, where the housing requirement could shift in response to updated datasets rather than being tested on a consistent evidential basis;
- Incentivising delay in plan preparation or examination in order to take advantage of potentially lower future figures; and
- Conflicting with the PPG’s clear intention that housing need figures should remain fixed for a reasonable period to support effective plan-making.

2.14 In this case, we also note that Horsham District Council is required to begin plan-making under the new plan-making system by the end of June 2026 (because the submitted Plan provided for less than 80% of LHN). We understand that (as of March 2026), the LHN for Horsham District is 1,322 dwellings per annum.

2.15 Before this draft Local Plan is even adopted (or even the next stage of hearing sessions), the Council will need to be working on a new Local Plan and addressing a significantly greater housing requirement than envisaged in the draft (as submitted or to be modified).

2.16 In the recent examination hearing sessions regarding the Mid Sussex Local Plan, the Inspector has referred to the Council testing an overall requirement of around 1,200 – 1,300 on the premise that this figure could then be comparable to the latest LHN for Mid Sussex District.

2.17 The correct approach is that the housing need figure should be based on the evidence available at the time the Plan was prepared and submitted, and that this figure should continue to form the basis for examination, provided it remains within the two-year period identified in PPG.

2.18 Accordingly, any attempt to reduce the housing requirement at this stage, purely as a consequence of a change in the Standard Method output, would be inconsistent with national guidance. The Examination should therefore proceed on the basis of the submitted housing requirement.

2.19 The table below sets out how, in our view, the housing requirement for the HDLP should be calculated on the basis of the current plan period, and represents a justified and appropriate basic Local Housing Need figure for the purposes of the Plan

Year	SM Baseline
2023 base date	911
Plan Period Housing Need (2023 – 2040 / 17 years)	15,487

B. The Relationship of this Figure to the Base Date of the Plan

- 2.20 The plan as submitted has a plan period of 2023/24 to 2039/40, with a base date of 1 April 2023. The Council's position is that the Plan should retain its current base date of 1 April 2023 and should not be updated arguing that reviewing the base date would necessitate revisiting and updating the evidence base, which would introduce unnecessary delay to the plan preparation and examination process.
- 2.21 This does not constitute an adequate justification for maintaining a shortened plan period. The need to review and, where necessary, update the evidence base is an inherent and expected part of the plan-making process, particularly where doing so is required to ensure compliance with national policy. The potential for additional work or delay cannot outweigh the requirement set out in the NPPF to plan positively over a minimum 15-year horizon.
- 2.22 The Plan will not be adopted until after 1st April 2026, and therefore an end date of 2040 would only provide for 13 'full years' at best. Our position is that for the Plan to be found sound the Plan should cover 15 years post adoption to be consistent with paragraph 22 of the NPPF (2023) which states "*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure*". Consequently, the plan period should be extended to 2042, and the housing requirement adjusted accordingly as set out in the table below.

	Plan period 2023 – 2040	Plan period 2023 - 2042
LHN of 911 dpa	15,487	17,309

C. The Amount of Unmet Housing Need from Nearby Districts to be Accommodated

- 2.23 The Council's Housing Requirement Topic Paper (HDCJB04) sets out that at the point of submission, the Council was unable to meet its own housing need because of the constraint of water neutrality. The Council's longstanding position with regard to unmet need has been that, in a scenario where the constraints to housing delivery were resolved, Horsham would seek first to meet its own need in full, after which meeting wider housing need from the North West Sussex Housing Market Area (NWS-HMA) would be its priority. Coastal West Sussex HMA would be the third priority. This hierarchy reflects the very different nature and scope of the two HMAs, including the relatively modest extent to which the Coastal West Sussex HMA relates to Horsham District.
- 2.24 Given the significance of Crawley, as a sub-regional economic centre, we agree with the focus and priority given to the NWS-HMA (but that does not mean we do not consider any other unmet needs to be irrelevant and, in fact, suggest that all unmet needs should be addressed in a sustainable manner).

- 2.25 The latest Statement of Common Ground (“SoCG”) between Mid Sussex District Council, Crawley Borough Council and Horsham District Council (as set out in the Council’s Housing Requirement Topic Paper) identifies unmet housing need in the NWS-HMA as follows.

Authority Area	Under / Over Supply
Crawley	-7,505
Horsham	0
Mid Sussex	+1,693
NWS HMA Total	-5,812

- 2.26 In our view, HDC should accommodate (not just test) half of Crawley Borough Council’s unmet need (approximately 3,753 homes). This is on the assumption that the other half would be provided in Mid Sussex. We reiterate our long-held view that that these dwellings should be provided in locations which are capable of meeting the those needs close to where they arise.
- 2.27 Whilst the Council’s approach to contributing towards unmet need from Crawley is supported in principle, it is important that this commitment is treated as a minimum and is not diluted. Should the housing requirement increase, whether as a result of changes to the plan period, updates to the standard method, or other factors, this level of contribution should be maintained in addition to, rather than within, any uplift. To do otherwise would risk undermining the effectiveness of cross-boundary planning and the ability to address identified unmet needs.
- 2.28 More fundamentally, the Plan should be seeking to maximise housing delivery in accordance with national policy expectations. Given the scale of housing need within the Housing Market Area, there is a clear justification for the Council to plan positively for a higher level of growth where this can be sustainably accommodated. This is particularly important in the context of constraints having previously limited delivery; those constraints should not be used to justify a lower overall level of provision where opportunities exist to boost supply. As such, the Council should be seeking to deliver more homes overall, ensuring both its own needs and a meaningful and sustained contribution to the unmet need from Crawley are addressed in full.

D. Whether Any Other Factor Should Influence the Housing Requirement

- 2.29 Overall, the Council proposes a housing requirement of 17,828 homes, based on its standard method need, a reduction for the South Downs National Park, and its contribution to Crawley’s unmet need, phased over the plan period to reflect delivery constraints.
- 2.30 HDC’s Housing Requirement Topic Paper limits its consideration to the issue of unmet need arising from neighbouring authorities. This is, however, a narrow interpretation of the relevant guidance.
- 2.31 The 2023 NPPF states (paragraph 61) that:

“The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals” Our emphasis

- 2.32 Furthermore, the PPG is clear that other factors may also justify an uplift to the housing requirement. In particular, the need to deliver affordable housing is a key consideration. PPG (Paragraph: 024, Reference ID: 2a-024-20190220) explicitly states that *“an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* This establishes that affordable housing need is not merely a consequence of housing delivery but can itself be a driver for setting a higher overall housing requirement where necessary to improve affordability outcomes.
- 2.33 There are compelling reasons why the affordable housing should result in the housing requirement being increased, above the ‘advisory starting point’ of the LHN.
- 2.34 The Council’s Housing Needs Topic Paper (March 2026) (HDCJB07 version 2) identifies a total net annual need for affordable rented housing of 492 dwellings per annum, and 62 dwellings from affordable home ownership. This level of need is substantial in absolute terms and is particularly significant when considered in relation to the overall level of growth proposed in the District.
- 2.35 Under the current baseline housing figure, we consider that it will be extremely challenging to secure sufficient affordable housing delivery through typical policy-compliant development which addresses these needs. As such, the evidence indicates that there is a strong justification for considering an uplift to the overall housing requirement as a means of boosting affordable housing supply, in line with national guidance.
- 2.36 There are also compelling affordable housing issues arising from Crawley Borough (which themselves highlight the importance of ensuring that the HDLP robustly meets the needs of Horsham but should also address unmet needs arising from Crawley as well).
- 2.37 Evidently, the levels of affordable housing required are a very significant proportion of the overall level of housing planned per annum. It is inconceivable that this is a Plan which is currently capable of addressing those needs.

E. The Appropriate Housing Requirement Arising from A. to D.

- 2.38 HDC's Housing Requirement Topic Paper (HDCJB04) sets out that the Council proposes an updated requirement of 17,828 homes, which consists of 14,071 units to meet Horsham District’s need in full, and 3,757 to meet half of Crawley Borough Council’s unmet need. This is over the period 2023 – 2040.

2.39 Our position is that the housing requirement should be calculated on the submitted housing requirement and should not be adjusted on the basis of the proportion of the district within the SDNP (given uncertainties associated with the adoption of the SDNPA Local Plan). We also consider that the plan period should be extended by a further two years to ensure that the Plan covers a 15-year period post adoption in line with national policy. The table below shows our position on what the housing requirement should be, purely based on the LHN and provision for 50% of Crawley's unmet need.

Year	SM Baseline
2023 base date LHN 2023-2042 (19 years x 911)	17,309
Unmet need contribution (for Crawley)	3,757
Total Plan Period Housing Need (2023 – 2042 / 19 years)	21,066

2.40 Alternatively, if the Inspector is minded to adopt the approach encouraged by HDC (but did not reduce the requirement due to the SDNPA), which appears similar to that accepted in relation to the Mid Sussex Local Plan, the requirement would be as follows:

Year	SM Baseline
2023 x 1 year	911
2024 x 1 year	917
2025 x 15 years	838
Unmet need contribution (for Crawley)	3,757
Total Plan Period Housing Need (2023 – 2040)	18,155

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