



# Hearing Statement – Matter 1: the housing requirement

**Horsham District Council Local Plan 2023-2040:  
Examination in Public – April 2026**

**Prepared on behalf of Thakeham Homes Limited**

Thakeham House,  
Summers Place, Stane Street,  
Billingshurst, West Sussex  
RH14 9GN

Prepared by:

Dr Chris Lyons MRTPI

**SLR Consulting Limited**

Mountbatten House, 1 Grosvenor Square, Southampton  
SO15 2JU  
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## 1.0 Matter 1 – the housing requirement

### Executive summary

- 1.1 In determining whether the plan is sound the Inspector will have to consider (amongst other things) whether it is positively prepared (NPPF paragraph 35(a)) and consistent with national policy (NPPF paragraph 35(d)).
- 1.2 At the heart to the Framework is the presumption in favour of sustainable development (paragraph 10 NPPF). The presumption, as it applies to plan-making, is set out at paragraph 11(a) and (b).
- 1.3 Paragraph 11(b) states that strategic policies should *as a minimum*, provide for objectively assessed needs for housing and other uses, *as well as any needs that cannot be met within neighbouring areas (our emphasis) unless either of two criteria are engaged*.
- 1.4 Once the objectively assessed need for housing is established in the Horsham area and needs which cannot be met in other areas are established, a plan which did not make provision for those needs would be contrary to national policy and unsound unless the criterion at 11(b)(i) or 11(b)(ii) were shown to apply.
- 1.5 If the Council wish to argue that the presumption is rebutted, it is for them to produce evidence. The Council has not engaged with the presumption and have not produced evidence to rebut it.
- 1.6 Horsham district is the least constrained local authority in the area and is a functional part of no less than three housing market areas. It is a direct consequence of the application of the plan-making presumption at 11(b) that Horsham must make provision to accommodate unmet need. If it does not, that unmet need will not be met anywhere else and, ultimately, will not be met at all in the plan-led way that the NPPF contemplates. The current suggestion of taking half of the unmet need from one neighbouring authority misunderstands the requirements of the NPPF and the scale of the housing crisis.
- 1.7 The housing requirement figure is therefore not justified as it does not meet the housing need of the neighbouring areas (as set out in point c below) and so is not positively prepared and is not effective. Consequently, the plan fails to comply with paragraph 11(b) of the NPPF and is not consistent with national policy.
- 1.8 The plan could be made sound by making Main Modifications to include a significant uplift in numbers to meet a reasonable proportion of the unmet neighbouring housing need.
- 1.9 There are other sites available that have already been consulted on and can easily assist to meet this need. Wealdcross (HA5) was previously allocated in the Local



Plan but removed due to water neutrality and so has been clearly accepted by the Council as a suitable site. It could be added in through Main Modifications without offending either (i) or (ii) in para.11(b) of the NPPF.

**a) The identification of the appropriate basic local housing need figure for the purposes of the plan**

1.10 While there are arguments that the Council should be seeking a higher number by using a new base date rather than using several years of under delivery, it is accepted that this would create additional work and potential delay and this is a pragmatic compromise. No point is taken in relation to the adjustment to take account of need arising in the SDNP (HDCJB04 Table 2).

**b) The relationship of this figure to the base date of the plan**

1.11 See above.

**c) The amount of unmet housing need from nearby districts to be accommodated**

1.12 The NPPF (2023) clearly states in para. 7 that the purpose of the planning system is to achieve sustainable development. This is then defined as “...meeting the needs of the present without compromising the ability of future generations to meet their own needs.” To meet the needs of the present includes providing housing for those who need it now, unless there is some clear unacceptable harm in doing so.

1.13 To ensure that development is achieved in a positive way, the NPPF has a presumption in favour of sustainable development ‘at the heart’ and this is set out in para. 11 of the NPPF. This applies to both determining planning applications but for our purposes in the Examination, it is just as strong for those making local plans.

1.1 The presumption clearly states in Paragraph 11(b) that for plan-making, strategic policies should *as a minimum*, provide for objectively assessed needs for housing and other uses, *as well as any needs that cannot be met within neighbouring areas (our emphasis)*. This is a clear presumption in favour of sustainable development which can only be rebutted if either of the circumstances described at sub-paragraphs (i) and (ii) apply. Neither of these exceptions apply in Horsham on face value and neither are said to apply by the Council, who have failed to approach the question of the extent to which they should meet their neighbours’ unmet need in accordance with para.11(b).

1.2 The starting point under the NPPF for Horsham is therefore to meet 100% of their own housing needs. Then, they should be looking to meet 100% of the unmet need



- for neighbouring authorities, unless either of the Para. 11(b) exceptions apply (which they do not).
- 1.3 Any contention that either of the exceptions apply (and if so, at what level of unmet need being met in Horsham) should be based on proportionate evidence and on robust analysis which at present is absent. The only reason that the Council gives for not meeting further unmet need beyond 50% of Crawley’s is that it is “likely to be challenging, in part as a consequence of the lack of an immediate ‘pipeline’ of housing sites when water neutrality prevented significant permissions to be granted.” See paragraph 15 of HDCJB04. That contention falls a long way short of a robust application of para.11(b).
- 1.4 While HDC is seeking to meet its own housing requirement (albeit the SDNPA is meeting 2.3% of the need within the Park), they are only offering to meeting 50% of Crawley’s unmet need. This is contrary to the national policy requirements in the NPPF. The justification advanced by the Council for not meeting its neighbours’ needs does not in fact appear to have even been informed by an understanding of what the wider unmet needs of its neighbours are and has not been informed by considering either exception (i) or exception (ii) in para.11(b).
- 1.5 We set out below the unmet needs of neighbouring authorities. We have used the Council’s own evidence as set out in their submitted SOCG with the authorities, but it should be noted that these were written for the last Examination and the housing needs have increased since then. Therefore, this is a conservative estimate.

#### Crawley BC

- 1.6 HDC has stated they will take 50% of the Crawley unmet need of 7,505 houses which equates to 3,753 houses. However, this is based on the assumption that Mid-Sussex will meet the other half, but Mid-Sussex is only reviewing whether they can do this now, so this needs to be kept under review. If MSDC cannot accommodate half of Crawley’s unmet need, then, unless the presumption is rebutted, HDC must make provision for the remaining unmet need.

#### Brighton and Hove CC (BHCC)

- 1.7 Taking the Council’s own evidence in the SOCG (DC07), BHCC’s SM is 2,319dpa but they are only meeting 660dpa in the current Local Plan for 2010-2030.
- 1.8 In the SOCG, it is noted that BHCC do not agree that the Coastal West Sussex HMA should be secondary in priority to the North West HMA given the scale of housing need. We note that even if the Council can show that it is sound to treat the Coastal West Sussex HMA as a secondary priority, given the acute scale of unmet need arising in that HMA, that still means it is a priority. The Council’s approach to that HMA has been to exclude the possibility of meeting any of its need, rather than to prioritise it whether at all or in a secondary manner. That is indicative of a failure to



- positively plan, is not justified, is ineffective, contrary to national policy, and is fundamentally inconsistent with the characterisation of the HMA as a second priority.
- 1.9 No real number is concluded in the SOCG but at the recent Mid-Sussex examination, the SOCG submitted<sup>1</sup> (DC5) to that Examination agreed that the Council were only meeting 44% of their housing need up to 2030 with a shortfall of c.17,000 based on the OAN at the time (page 5 point 6 of the report).
- 1.10 BHCC is working on a new Local Plan called City Plan 2041<sup>2</sup> and the Key Issues Consultation in October 2024 states that the new SM figure is 2,435 homes per annum but they can only deliver 670 homes a year from 2024-2041 (para. 3.4 and 3.5). This is an unmet need of over 30,000 homes.
- 1.11 While the figures for Brighton can be argued to be much higher it appears a conservative estimate of unmet need that is accepted, is around 17,000 homes.

#### Worthing

- 1.12 Paragraph 2.8 of the SOCG (DC06) states the Local Plan was adopted in March 2023 and seeks to deliver 3,672 dwellings of the 14,160 requirement (only 26%). This leaves a shortfall of 10,488 homes.

#### Adur

- 1.13 The SOCG (DC06 at paragraph 2.14) states the Local Plan was adopted in 2017 and seeks to deliver 3,718 dwellings but that was only 53% of the identified housing need. They are working on a new Local Plan but have not made any progress. This is a shortfall of 3,297 homes. Adur DC are preparing an updated Local Plan- there is nothing to indicate they will be able to meet all the identified need within their district, which is heavily constrained by higher-order planning, spatial and landscape designations.

#### Mole Valley DC

- 1.14 The SOCG (DC03) states Mole Valley will only meet 75% of its own need with an unmet need of c.1,700 homes over the plan period of 2020-2039.

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<sup>1</sup> [dc5-brighton-and-hove-city-council.pdf](#)

<sup>2</sup> [8099 City Plan Review consultation document V5.indd](#)



1.15 Bringing all of this together, the unmet need identified even within the Council’s own evidence is significant.

<b>Authority</b>	<b>Unmet Need</b>
Crawley	7,505
Brighton and Hove	17,000
Worthing	10,488
Adur	3,297
Mole Valley	1,700
<b>Total</b>	<b>39,990</b>

**Table 1: Unmet housing need in neighbouring authorities**

1.16 This figure of almost 40,000 homes that are desperately needed for families and individuals is a very conservative figure and the new SM figures are considerably higher for these authorities. However, given HDC is currently offering to meet 3,753 homes from this number, we think this illustrates the point as it is. This is around 9% of the unmet need. If the remaining 91% of unmet need homes are not accommodated in Horsham, there will not be a plan-led solution to delivering those homes in these authority areas. The social and economic consequences of that would be acute and would directly contradict national policy.

1.17 The question then moves to whether there is any sound reason why Horsham cannot accommodate this unmet need.

1.18 The authorities along the south coast (Worthing, Adur, and BHCC) are constrained to the south by the sea, to the side by each other and other constrained authorities, and then the National Park lies to the north. Horsham, by comparison, is relatively unconstrained with less than 7% of the district subject to either Green Belt or National Landscape. By comparison, Mid-Sussex has almost 50% of the district covered by either Green Belt or National Landscape and Mole Valley has 77%.

1.19 Horsham is also located in a highly sustainable location in relation to the neighbouring authorities with excellent transport routes from the south coast via the A24 and A2037/A281 roads and good train services from all along the south coast.



- Crawley and Mole Valley are even closer to Horsham town making access from people in these authorities desperately looking for housing relatively easy.
- 1.20 The 2021 Draft Local Plan (2021-2038) identified that a new settlement would be required and identified Buck Barn (Wealdcross) (HA5) as the solution. There was a clear rationale for this choice *“In addition, a new settlement is also identified at Buck Barn, on the A272 and A24 corridors. This central location in the District, with good road connections provides links to both the northern settlements within the Gatwick diamond, and connections to the south coast”* (para. 6.26).
- 1.21 The Wealdcross site is therefore accepted by HDC as a good location to meet unmet housing needs from both the north and the south given its central location. In other words, Horsham is able to accommodate a significantly higher proportion of its neighbours’ unmet needs without criteria (i) and (ii) in NPPF paragraph 11(b) being engaged.
- 1.22 The Council clearly stated *“Detailed consideration has also been given as to whether new settlements may be a solution to meeting the unmet needs for the South Coast. Land at Buck Barn has been allocated for development... the location of the proposed development on the A24 has the potential to provide a direct connection to the South Coast. The District is therefore able to provide around 20 homes a year towards the unmet needs from Worthing.”* (para. 6.15 of the 2021 Draft Local Plan **SS02**).
- 1.23 While the amount of development attributed to meet Worthing’s housing need is uninspiring and unjustified, it does show the Council accept both that some of the south coast need should be met and that Buck Barn / Wealdcross is well located to meet this.

**d) Whether any other factor should influence the housing requirement**

- 1.24 The Council states that para. 16 of their Matter 1 paper answers the question as to why they cannot meet the unmet need from authorities other than Crawley. However, this simply states there is a less clear pattern of movement between Horsham and the coast as there is with the northern authorities, but this is not the test set out in the NPPF or either of the exemptions listed in Para. 11(b).
- 1.25 Given the close proximity between the coastal authorities and Horsham with good transport links, it is not considered there is any overriding reason why the Council should not seek to address the unmet need. Given the scale of housing needed, the Council could also plan with the public transport bodies for upgrades and improvements to the public transport given the amount of money that would be



- available through CIL etc. The existing services are already good with trains every 30 minutes from Worthing to Horsham for example.
- 1.26 The Council should be testing the ability of the district to take all of the unmet need in their SEA/SA and then using the findings of that to see if there are limits on how much of that need they can accommodate. That is the minimum requirement for Para. 11(b) to be properly applied. When carrying out this analysis it is critical that the Council look for ways in which any development constraints which are said to exist can be overcome or mitigated, rather than simply identifying constraints.
- 1.27 Thakeham also note that the Council’s proposed housing requirement at this point will only meet 78% of its Local Housing Need as quantified under the December 2024 Standard Method (see para.19 of HDCJB04). The effect of that under para.236 of the December 2024 NPPF is to trigger an obligation to begin work on a new plan, the moment this plan is adopted, in order to reflect “the shortfall in housing need”.
- 1.28 The prospect of such a sanction being engaged immediately following adoption means that the plan is not sound because it would not be effective. To be effective a plan must be deliverable over the plan period.

**e) The appropriate housing requirement arising from a. to d.**

- 1.29 The housing requirement under the NPPF is made up of the Council’s own OAN and then any unmet needs from neighbouring authorities. Taking the Council’s annualised figure of 1,049dpa (table 6 of their Matter 1 statement) and dividing the unmet need across 17 years (minus the half of Crawley’s unmet need they are offering to meet) gives a figure of 2,131dpa.
- 1.30 The correct policy-compliant total to test would therefore be 54,061 homes or an annualised target of 3,180dpa.
- 1.31 It is accepted that this figure is unlikely to be the final figure and that the SEA/SA process will reduce the number, but to comply with the NPPF, the Council should be starting with that figure to test against, so that they can understand what the effects of this growth scenario would be so that they can properly apply exceptions (i) and (ii) in Para.11(b).
- 1.32 The high growth strategy is therefore the one that should be pursued *as a minimum* and therefore *at least three additional strategic sites are required* to be brought forward.
- 1.33 Wealdcross is a proposed new garden settlement by Thakeham Homes that was previously proposed as an allocation by the Council (known as Land at Buck Barn SS02 Strategic Policy HA5 and SHLAA reference SA716). It is for up to 3,300 homes with all the required infrastructure included for health, community, education,



employment etc. It was removed from the plan due to water neutrality, but this is no longer an issue, and we have been undertaking pre-application discussions with the Council and County Council to ensure it can be delivered in a timely manner.

- 1.34 Thakeham Homes also has three other smaller sites of approximately 100 units each that could also come forward and help to deliver within five years of allocation.





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