



Examination of the
Horsham District Local Plan 2023-2040

Matter 1: Housing Requirement Topic Paper

HEARING STATEMENT

Prepared by Blue Fox Planning Ltd on behalf of:

Richborough

Representation Numbers: 1207902 (1211480 and
1211486)

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1. Introduction

1.1 This Hearing Statement has been prepared by Blue Fox Planning Ltd on behalf of Richborough. This Statement has been prepared specifically in response to Matter 1: The Housing Requirement .

1.2 Richborough currently control one site within Horsham District, this being:

- Land off Coneyhurst Road, East of Billingshurst

1.3 Richborough previously controlled Land at Glebe Farm, Steyning, before its sale to Vistry Homes Ltd. The Inspector will be aware that this site is included within the Submitted version of the Local Plan under Strategic Policy HA19: Steyning Housing Allocation. Specifically, that Policy states:

“1. The following sites are allocated, as shown on the Policies Map, for the provision of at least 240 homes:

- *STE1: Land at Glebe Farm, 14 hectares (240 homes).”*

1.4 The Inspector is respectfully asked to note that the Glebe Farm site was subject to an outline application submitted on behalf of Richborough in September 2021. The LPA’s reference for the application is DC/21/2233 and the description of development is as follows:

“Outline application for up to 265 dwellings, demolition of No. 37 Kings Barn Lane to provide new pedestrian/cycle/emergency link, provision of vehicular access from the A283 Steyning by-pass, provision of public open space, community orchard, sustainable drainage and other ancillary and enabling works. All matters reserved except for vehicular access from A283.”

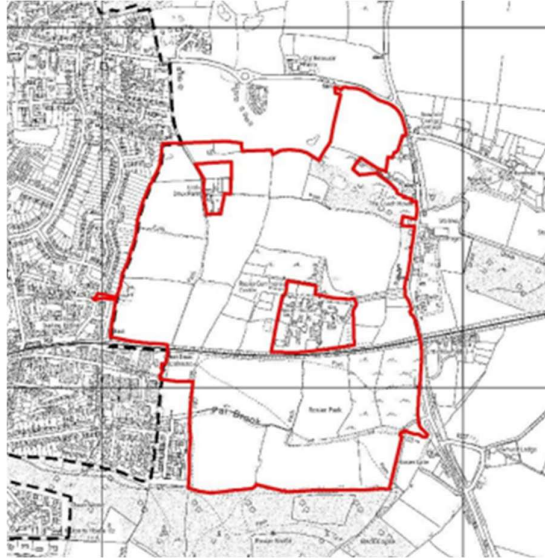
1.5 On 26th September 2024, Horsham District Council’s (HDC) Planning Committee South resolved to grant outline planning permission subject to the completion of the necessary Section 106 Agreement(s). Approval was granted on the 29th November 2024 within a context where water neutrality was still a material consideration. Glebe Farm has subsequently been subject to a Reserved Matters application by Vistry Homes Ltd (DC/25/1138) with permission granted 19th December 2025.

1.6 Richborough’s site off Coneyhurst Road, east of Billingshurst, is not currently proposed to be allocated in the draft Local Plan but has been subject to representations at previous stages of Plan preparation including at Regulation 18.

1.7 It is relevant to note that on the opposite side of the railway to the north is the proposed under Strategic Policy HA4: Land East of Billingshurst. The Inspector’s attention is respectfully drawn to the fact that, at Regulation 18 stage, the Local Plan allocated land

both sides of the railway; that is to say the current HA4 allocation AND land that is now under Richborough's control. This is illustrated in **Figure 1**, below.

Figure 1: Land East of Billingshurst (Little Daux) – Regulation 18 Horsham Local Plan, February 2020.



- 1.8 We fully respect that, at this stage, Richborough's site, Land off of Coneyhurst Road, Billingshurst, is not being considered as a Site Allocation, however as per your letter to the Council (DJB01-Inspectors-response-to-HDCJB01) you note that *"The new work will involve ... establishing the housing requirement and finding additional opportunities for development to meet identified needs..."* (underlined for our emphasis). The promoted site Land East of Billingshurst is available, achievable and deliverable for development with Richborough having a proven track record of site delivery within Horsham District.

2. Matter 1: The Housing Requirement

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

- 2.1 It is accepted that the Plan is being examined under the transitional provisions of the December 2023 NPPF, and that the Standard Method figure at submission was 911 dwellings per annum.
- 2.2 However, the issue for this Examination is whether the Plan, as now proposed, is sound. This includes whether it is based on proportionate and up-to-date evidence and whether it is positively prepared. The Standard Method provides a minimum starting point and should not be treated as a cap or constrained by delivery assumptions.
- 2.3 Updated affordability ratios published by the Office for National Statistics (March 2026) indicate that the Standard Method housing need for Horsham has reduced marginally from the 2025 calculation moving from 1,338 to 1,322 dwellings per annum (a change of 16 dwellings, or 1.2%).
- 2.4 This change is not material and does not alter the scale of housing need, which remains substantially higher than both the submitted plan requirement (c.777 dwellings per annum) and the Council's alternative figure. The housing requirement remains significantly below the level of need.
- 2.5 The Council's evidence base, including the Matter 1 Topic Paper, predates this latest update. Whilst the change is modest, it demonstrates that housing need is evolving during the examination process and reinforces the importance of relying on the most up-to-date evidence.
- 2.6 Even based on the updated Standard Method figure of 1,322 dwellings per annum, the Council's proposed requirement of approximately 1,049 dwellings per annum represents a shortfall of approximately 270 dwellings per annum. When compared to the submitted requirement of 777 dwellings per annum, the scale of under-provision is significantly greater
- 2.7 The Council's updated position proposes a requirement of 17,828 dwellings, comprising 14,071 dwellings to meet its own need and 3,757 dwellings towards Crawley's unmet need. The issue is whether this revised requirement is robust and policy compliant.
- 2.8 At submission stage, the Plan did not seek to meet the Standard Method figure of 911 dwellings per annum. Whilst the Council has now moved away from that position, this reinforces the need for scrutiny of whether the revised requirement genuinely seeks to meet identified need.

- 2.9 Even if accepted, the evidence under Matter 2 demonstrates that the Plan does not provide a deliverable supply sufficient to meet that requirement. The issue is therefore twofold: the requirement is not robust, and the Plan fails to meet it in practice.
- 2.10 The Council's own Regulation 19 Plan confirms that:
- "The starting point for the local plan strategy is to ensure that the District's own housing and other development needs can be met in full."*
- 2.11 However, the submitted Plan does not do this. It defines a housing requirement below the minimum level of need identified through the Standard Method, directly conflicting with national policy requirements for positive preparation.
- 2.12 Paragraph 36(a) of the NPPF requires that plans should, as a minimum, seek to meet the area's objectively assessed needs. A plan which sets its housing requirement below that minimum, in the absence of robust and evidenced exceptional circumstances, cannot satisfy this requirement.
- 2.13 The Council's reliance on work undertaken by the South Downs National Park Authority raises concerns regarding the status and weight of that evidence. Whilst there has been an indication that a Proposed Submission Plan would be progressed in early 2026, there is no publicly available evidence that it has been formally endorsed or published for Regulation 19 consultation. The emerging Plan therefore remains at a pre-submission stage and can attract only limited weight. Any assumptions arising from that process remain untested.
- 2.14 In the absence of Regulation 19 publication, the SDNPA Local Plan Review remains at a pre-submission stage, where policies and spatial strategy are still subject to change and have not been independently examined.
- 2.15 The Council relies on Planning Practice Guidance to justify continued use of the Standard Method figure at the point of submission. The PPG (Paragraph: 008 Reference ID: 2a-008-20241212) states that *"...the local housing need figure may be relied upon for plan-making for a period of two years from the date of submission..."*
- 2.16 The Plan was submitted in July 2024, meaning this period expires in July 2026. On any realistic programme, adoption will occur beyond this date.
- 2.17 The PPG does not provide that a housing need figure can be relied upon indefinitely. Rather, it establishes a time-limited basis for reliance.
- 2.18 The recent update to the Standard Method (March 2026) demonstrates that housing need is already evolving within this two-year period, further undermining any reliance

on a fixed submission-stage figure. Once the two-year period has passed, the evidence becomes increasingly out-of-date and should be reviewed or robustly justified.

- 2.19 Whilst the Council has updated the housing requirement, it has not done so in a way which provides a robust or fully justified assessment of need. The Plan will therefore be adopted on the basis of a housing requirement which is already out-of-date, contrary to the requirement for plans to be based on proportionate and up-to-date evidence.
- 2.20 This approach is consistent with established case law. In *St Albans v Hunston Properties Ltd* the Court of Appeal confirmed that housing need must be assessed in full and unconstrained before policy considerations are applied. In *Wavendon Properties Ltd v Secretary of State for Housing, Communities and Local Government* the Court confirmed that the weight to be given to housing evidence is a matter of planning judgment, but must be based on up-to-date and robust evidence. Taken together this reinforces that reliance on an increasingly out-of-date housing need figure requires clear justification, which has not been provided.
- 2.21 The Council's approach appears to be driven by the level of supply it considers deliverable, rather than by the level of need identified through the Standard Method. This results in a housing requirement which is constrained by delivery assumptions, rather than one which responds positively to identified need. This approach is inconsistent with the principle established in *Hunston* that housing need must be identified first and not constrained by delivery assumptions.
- 2.22 The above matters together the Plan fails to meet the requirement for plans to be positively prepared and based on proportionate and up-to-date evidence.

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

- 3.1 The Council's position on the base date relies heavily on an assumed need for consistency with the Mid Sussex Local Plan. However, this reliance is misplaced. The Mid Sussex context is materially different, including in respect of housing supply, constraints and plan progression. There is no evidential basis for transposing an approach from a separate examination, particularly were doing so has the effect of suppressing the housing requirement.
- 3.2 The Council does not demonstrate that consistency between authorities is necessary but instead states only that it was considered. No evidence is provided to explain why such an approach is required, nor how it aligns with national policy. Consistency between authorities is not a requirement of national policy; rather, each plan must be based on its own proportionate and up-to-date evidence.
- 3.3 The Council's approach is internally inconsistent. Whilst elements of the Standard Method have been updated, the base date, plan period and housing requirement have

not been updated accordingly. This selective application of updated inputs has the effect of reducing the overall housing requirement.

- 3.4 The Council suggests that reviewing the base date would introduce delay. This is not a sound planning justification. National policy requires that plans are based on proportionate and up-to-date evidence, and this requirement cannot be set for expediency.
- 3.5 Similarly, the suggestion that longer-term housing needs can be addressed through a future plan is misplaced. The current Plan must be sound at the point of adoption. It is not appropriate to defer housing need, allocations or policy compliance to a subsequent plan prepared under a different regulatory framework.
- 3.6 The Plan has a base date of 1 April 2023 and covers the period to 2039/40. However, based on the current examination timetable, adoption is likely to occur in 2027 or later. By this point, a significant proportion of the plan period will already have elapsed, and the Plan will be approximately four years out-of-date.
- 3.7 In this context housing need is already evolving during the examination process. The combination of an outdated base date and a changing Standard Method further undermines the robustness of the housing requirement and reinforces the need for the Plan to be based on the most up-to-date evidence available.
- 3.8 This ultimately results in a plan which relies on a fixed historic baseline whilst selectively applying updated inputs. This is neither consistent nor justified and fails to ensure that the Plan is based on proportionate and up-to-date evidence as required by national policy.

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

- 4.1 The Council proposes to meet approximately 50% of Crawley's unmet need, equating to 3,757 dwellings. No clear evidence is provided to demonstrate why 50% represents an appropriate level of contribution. No evidence is presented to show that 50% represents the maximum reasonable contribution, rather than a starting point for testing higher levels of provision. Without evidence the 50% figure is an assumption rather than a reasoned and evidence-based conclusion.
- 4.2 The Council relies on the Statement of Common Ground (SoCG) to establish the scale of unmet need. Whilst the SoCG confirms the scale of unmet need within the Housing Market Area, it does not identify or justify any specific level of contribution from Horsham. In particular, it does not support or explain the proposed 50% figure, nor does it demonstrate that all reasonable options have been tested.

- 4.3 The SoCG identifies a North West Sussex Housing Market Area position of Crawley (-7,505), Horsham (0) and Mid Sussex (+1,693), confirming a substantial level of unmet need across the Housing Market Area. However, agreement on the scale of unmet need does not provide any justification for the proportion of that need to be accommodated by Horsham, nor does it demonstrate that the proposed contribution represents the maximum reasonable response.
- 4.4 Notably, the Crawley–Horsham Statement of Common Ground confirms that Crawley has requested assistance from Horsham in addressing its unmet need, but does not identify or agree any specific level of contribution. The proposed 50% contribution is therefore not an agreed position between authorities, but a figure selected by the Council through its plan-making process.
- 4.5 National policy requires plans to be positively prepared, including meeting unmet need where it is reasonable to do so. In this case, water neutrality is no longer a constraint, and the Council acknowledges that it can meet its own housing need. In these circumstances, there is a clear expectation that the Council should maximise its contribution to addressing unmet need within the Housing Market Area. This is not demonstrated
- 4.6 The removal of water neutrality constraints further undermines any justification for limiting provision. As demonstrated under Matter 2, the Plan identifies a shortfall of approximately 2,398 dwellings against the Council’s proposed requirement. In this context, the decision to meet only 50% of Crawley’s unmet need cannot be justified, particularly where the Plan does not deliver sufficient housing to meet its own requirement.
- 4.7 The Council suggests that meeting its own need and part of Crawley’s unmet need will be challenging. This position is not supported by up-to-date evidence. Historic constraints, including water neutrality, no longer apply, and additional deliverable sites are available at sustainable locations such as Billingshurst. The Council has not demonstrated that higher levels of delivery are not achievable.
- 4.8 The Council’s own updated evidence indicates that total supply is 15,430 dwellings, compared to an adjusted Horsham need of 14,071 dwellings and a proposed overall requirement of 17,828 dwellings. Whilst the Council’s figures suggest an apparent surplus against its adjusted own need, they also show a shortfall of approximately 2,398 dwellings against the Council’s proposed requirement. The Council has therefore not demonstrated that it has maximised its contribution to meeting unmet need within the Housing Market Area.

5. d) Whether any other factor should influence the housing requirement

5.1 The Council's position regarding Coastal West Sussex is noted. However, this reinforces Horsham's role within the North West Sussex Housing Market Area, where there are strong functional relationships. This is consistent with the Council's own evidence of strong functional relationships within the North West Sussex HMA, although that does not diminish the need for Horsham to maximise its reasonable contribution to Crawley's unmet need

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

6.1 The Council proposes a housing requirement of 17,828 dwellings, comprising 14,071 dwellings to meet its own need and 3,757 dwellings (50%) of Crawley's unmet need. As set out in Sections (a) to (d), this figure is not robust. It is derived from a reduced Standard Method figure, incorporates an untested SDNPA adjustment, and relies on an arbitrary assumption regarding the proportion of unmet need to be accommodated. Accordingly, the proposed housing requirement does not represent a sound or policy-compliant assessment of need.

6.2 The Council acknowledges that the proposed housing requirement represents approximately 78% of the December 2025 Standard Method figure (1,338 dwellings per annum). National policy is clear that plans should, as a minimum, seek to meet housing need in full. A plan which delivers only 78% of need is not positively prepared. This figure is itself dependent on the Council's underlying assumptions, including the SDNPA adjustment and the level of unmet need addressed.

6.3 The Council suggests that a lower requirement allows infrastructure and mitigation to keep pace with delivery. However, national policy does not support reducing housing need on this basis. As set out under Matter 2, even this reduced level of provision is not supported by a robust and deliverable supply.

6.4 Taking these matters together, the Plan is based on a housing requirement which is below the minimum level of need, derived from inconsistent and untested assumptions, and fails to respond appropriately to unmet need within the Housing Market Area. Furthermore, it does not demonstrate a deliverable supply sufficient to meet even its own proposed requirement. The Plan is therefore not positively prepared, not justified and not effective, and cannot be relied upon as a sound basis for the housing requirement.