

# Examination of the Horsham District Local Plan

Statement on behalf of Highwood Group

Representation Number(s): 1194363, 1194366, 1194369

**Matter 1 – The Housing Requirement**

April 2026

**Turley**

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Ryan Johnson



**Client**

Highwood Group

**Our reference**

HIGS3003

April 2026

# 1. Introduction

- 1.1 This statement is submitted on behalf of Highwood Group, who have interests in the assessed reasonable alternative growth option west of Billingshurst (See Regulation 19. Representations: [Document F](#)). We note and support the re-consideration of this option, alongside other reasonable alternatives, to help meet the land supply shortfalls that will be identified and confirmed after Stage One of this Examination.
- 1.2 We have and will continue to liaise with the LPA to provide further technical information in relation to our clients' interests, to assist the LPA in updating the Sustainability Appraisal that will underpin preferred and final allocations for the submitted plan. In this regard, the LPA will be aware that our client is in pre-application discussions with the LPA on the progression and submission of a comprehensive hybrid planning application for this site by the end of October 2026. An EIA Scoping Opinion has been issued by the LPA, and is subject to ongoing pre-application meetings and engagement, following a public exhibition in January this year.
- 1.3 This follows a considerable level of engagement with Billingshurst Parish Council, Billingshurst Sport and Recreation Association and a range of other community interest groups, who have to various degrees informed and offered their support for the comprehensive proposals tabled (See Regulation 19. Representations: [Document F](#) page 13+).
- 1.4 The hybrid planning application will seek consent for a residential-led development for up to 1,100 dwellings, 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated accesses and infrastructure (the 'Proposed Development'). Full permission will be sought within this for the first 500 homes, enabling the delivery of completions within the first five years of the emerging Local Plan's adoption. Further details on this will be shared as part of preparations for Stage 2 of the Examination, to inform and hopefully support the inclusion of this site as an allocation in the submitted Local Plan.
- 1.5 This Statement responds to the Inspectors' Issues and Questions for Matter 1 – The Housing Requirement.
- 1.6 Accordingly, we have examined the Inspector's questions for Matter 1 and provide responses to those we wish to contribute to debate on. We have also respectfully requested the opportunity to participate in the forthcoming hearing sessions to assist the Inspector further on such matters.

## 2. Response to Issues and Questions for Matter 1 – The Housing Requirement

### *Calculated Local Housing Need*

*Matter 1a: The identification of the appropriate basic local housing need figure for the purposes of the plan*

- 2.1 We note under the transitional arrangements of NPPF (Dec 2024), that the Local Plan remains to be assessed under the 2023 version of the Framework, and the standard method calculation in that version.
- 2.2 As HDC rightly state, at the point of submission in July 2024, the Local Plan was based on a standard method calculated need of 911 dwellings per annum for the period 2023-2040.
- 2.3 On that basis, HDC set out in Table 4 of their Housing Requirement Topic Paper (HDCJB04) the baseline minimum need calculated for a plan period 2023-2040 (14,071 homes).
- 2.4 It is noted this is based on an approach agreed during examination of the Mid Sussex Local Plan recently, in the interests of consistency. We raise no further comments therefore on the basic LHN minimum starting point per annum under this matter, nor to the base date of the plan period for similar reasons.
- 2.5 However, to be consistent with paragraph 22 of the Framework (2023), we would recommend the plan period be extended to 2042 to ensure strategic policies look ahead over the minimum 15-year period from anticipated adoption. We conclude this is particularly important given the current context, which includes:
  - 2.5.1 Adopted Local Plan – Housing Shortfall: The existing Local Plan was adopted in 2015, makes provision for 800 dwellings per annum, and addresses the period 2011-2031. As set out in Table 3 of the Housing Requirement Topic Paper (HDCJB04), this plan has failed to deliver its strategic objectives to date, with a **737-home shortfall** from 2011/12 - 2024/25.
  - 2.5.2 HDT – Shortfalls and Presumption Engaged: Latest 2023 HDT result confirmed **62% delivery against calculated minimum** needs.
  - 2.5.3 5YHLS Shortfall: HDC published an update in December 2025<sup>1</sup>, confirming at tables 5 and 6, that as of 1<sup>st</sup> April 2025, only a **1.7 years supply** could be demonstrated.
  - 2.5.4 Significant higher LHN for Review Local Plan: The **latest calculated minimum LHN is 1,338 dpa**. As HDC acknowledge at paragraph 19 of the Housing Requirement Topic Paper (HDCJB04), the housing requirement HDC are

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<sup>1</sup> [Horsham District Council Authority Monitoring Report](#)

seeking to adopt, even without any adjustment (see our comments below), would be less than 80% of this. Whilst NPPF, and recent published Government guidance<sup>2</sup>, requires LPAs to start work on a review plan from June 2026 to address such deficits, and there is an indicative timetable for this of 30 months, there is no guarantee this will be adhered to. There are clear uncertainties around Local Government Review and the shift to upper tier spatial plans.

A delay cannot be ruled out, which emphasises, alongside the other contextual matters we have identified above, the need for this plan to be positively prepared for a minimum of 15 years post adoption. The LHN starting point should therefore provide for this level of growth as a minimum, before going on to explore the need for upward adjustments to this. As we elaborate on further in response to Matters 1c and 1d, we consider this will require HDC to explore and test upward adjustments to the current baseline minimum, beyond just the needs of Crawley.

*Matter 1c: The amount of unmet housing need from nearby districts to be accommodated.*

- 2.6 Paragraph 35 of the Framework (Dec 2023) confirms that to be sound, Local Plans should be, amongst other factors, positively prepared, and provide a strategy which, over and above objectively assessed needs, seeks to address unmet needs from neighbouring areas, *‘where it is practical to do so and is consistent with achieving sustainable development;’*
- 2.7 We commend HDC for exploring options to meet 50% of Crawley’s unmet needs, as set out in Table 6 of the Housing Requirement Topic Paper (HDCJB04). However, it is evident there are other neighbouring areas that have significant unmet needs. This includes, for example, Worthing, with an unmet need of 10,488 homes, as acknowledged in the SoCG between HDC and Worthing Councils at the point of submission in July 2024<sup>3</sup>.
- 2.8 Paragraph 15 and 16 of the Housing Requirement Topic Paper (HDCJB04) acknowledges such additional unmet needs. Whilst it is evident the links with the Coastal HMA are not as strong as the NWS-HMA, it is acknowledged a link cannot be ruled out. As a consequence, it would be prudent in our view to provide evidence why HDC consider it would not be *‘practical’* to assist with meeting some of this unmet need or *‘consistent with achieving sustainable development’* (Para 35, NPPF [2023]).
- 2.9 Whilst the LPA may point to the SoCG with such Councils<sup>4</sup> in 2024, it is important to note that these were forged at a time when water neutrality was a key constraint. As paragraph 4.1 of the SoCG states, *‘it is recognised that, currently, constraints on housing delivery in the area are severe, and the parties are respectively unable to meet their full objectively assessed need. It follows that they are respectively unable to help meet*

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<sup>2</sup> Horsham DC in list of LPAs the Government directs should publish a notice of intention to commence plan-making by 30 June 2026 and to publish a Gateway 1 self-assessment by 31 October 2026. - [local-planning-authorities-required-to-start-plan-making-by-30-june-2026](#)

<sup>3</sup> [Adur-and-Worthing-BC-SoCG-July-24.pdf](#) para.2.8+

<sup>4</sup> [Adur-and-Worthing-BC-SoCG-July-24.pdf](#)

*others' unmet housing needs. (our emphasis). As water neutrality is no longer a severe constraint on delivery, what is not clear is the extent to which this position may now have changed. This should be remedied through further assessment.*

- 2.10 Paragraph 15 of HDCJB04 currently only states *the 'ability of the plan to demonstrate that its housing requirement can be met, with sufficient headroom to provide further resilience means it is very unlikely to be able to meet any additional unmet need over and above this.' (our emphasis).* Further evidence, and assessments of such options should be addressed through the SA process to demonstrate this approach is justified and consistent with paragraph 35 of the Framework (2023).

*Matter 1d. Whether any other factor should influence the housing requirement*

- 2.11 In addition to addressing unmet needs from neighbouring areas, and extending the plan period to adhere to paragraph 22 of the Framework (2023), we consider the acute shortfalls in affordable housing justify further upward adjustment to calculated baseline minimums.

- 2.12 Paragraph 18 of the Housing Needs Topic Paper (HDCJB07v2) suggests the net annual need for affordable housing is **554dpa**. This is derived from assessments undertaken over six years ago in 2019, and a partial update in 2022 (H01 and H10<sup>5</sup>), and hence should arguably be treated with caution. Nevertheless, as highlighted in paragraph 18 of HDCJB07v2, this represents over 61% of the baseline minimum LHN figure of 911dpa.

- 2.13 PPG<sup>6</sup> confirms LPAs should consider this total affordable need;

*'in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. 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. (our Emphasis).*

- 2.14 As a percentage of qualifying sites, it is evident this level of need will not be met by the current baseline calculated minimum LHN. In this regard, and for context, it would be useful for HDC to quantify for purposes of the Examination, the extent of this unmet need. There is currently no evidence to suggest further assessment has been undertaken, including through the SA, to demonstrate why some of this unmet acute need could not be met through an upward adjustment as suggested by PPG. We would recommend this assessment is undertaken, and, where justified, adjustments made to demonstrate the plan has been positively prepared in such regards.

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<sup>5</sup> <https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Examination-Library>

<sup>6</sup> 024 Reference ID: 2a-024-20190220

*Matter 1e: The appropriate housing requirement arising from a. to d.*

- 2.15 We suggest based on the responses a. to d. there is justification for an upward adjustment to the current housing requirement, to help meet a greater proportion of unmet needs for:
- 2.15.1 affordable housing within the district
  - 2.15.2 housing from neighbouring areas (i.e. Worthing)
  - 2.15.3 a spatial plan that extends to 15 years (rather than 13 years), in line with Paragraph 22 of the Framework (2023).
- 2.16 Further assessment is required in relation to such aspects to be able to finalise a housing requirement that meets the positively prepared test of soundness in the Framework. This should be undertaken as a matter of urgency as part of the updates to the SA, to inform reasonable alternatives to that currently proposed, which in turn will help inform the final preferred housing requirement, required revisions to the spatial strategy, and help identify the quantum and mix of additional allocations required to deliver this strategy. We elaborate further on supply related adjustments required in light under Matter 2.

- End -