

HEARING STATEMENT

MATTER 1 – HOUSING REQUIREMENT

Horsham Golf and Fitness

Generator Group

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1. INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Generator Group, the owner of the Horsham Golf and Fitness site. Generator Group has engaged in the Local Plan process to date and has sought to identify its concerns with the legal compliance and soundness of the draft Local Plan from the outset.
- 1.2 Generator Group supports, in-principle, the Plan-led system. In order for a Plan-led system to function it requires Local Plans to be not only legally compliant and sound, but for them also to be deliverable, proportionate and based on clear evidence.
- 1.3 The National Planning Policy Framework ('NPPF' or 'the Framework') confirms that Plans will be sound if they are positively prepared, justified, effective and consistent with national policy. For the reasons identified in the representations, which we will expand on, the Plan accords with none of these requirements.
- 1.4 The site extends to 55.57 hectares and is currently home to Horsham Golf Club, with an 18-hole course, a 9-hole course, driving range, putting greens and short game area alongside a range of other ancillary facilities including a cafe and gym. It lies adjacent to the Horsham Football Club and the access onto Worthing Road lies opposite the Horsham Park & Ride, recycling centre and petrol filling station.
- 1.5 An outline planning permission has been allowed at appeal under reference APP/Z3825/W/24/3355546 in 2025 for the development of the site for a Sports and Leisure Hub including the provision of communal facilities, nursery and up to 800 dwellings. Following the decision, Generator continues to work collaboratively with key site partners and Horsham District Council to ensure implementation of the permission.
- 1.6 Generator Group has submitted duly made representations to each stage of the Local Plan production process. For clarity, this has included representations to:
 - The consultation on the Local Plan Review – Issues and Options – Employment, Tourism and Sustainable Rural Development in April 2018;
 - The consultation on the Site Selection Criteria in June 2019;
 - The Draft Local Plan (Reg 18), including the Interim Sustainability Appraisal for Strategic Sites and Growth Options and the Site Assessment Report, in February 2020;
 - The Draft Local Plan (Reg 19) in March 2024; and
 - The Examination of the Horsham District Local Plan 2023-2040 undertaken by Inspector Luke Fleming in November 2024.
- 1.7 This Hearing Statement expands on the issues identified within the representations regarding the Council's failures to make adequate provision for addressing unmet housing needs, in particular those arising from coastal authorities.
- 1.8 It is not possible for these fundamental matters to be resolved and therefore the Plan in its current form is incapable of being taken forward to adoption.
- 1.9 In the event that the Plan is nevertheless taken forward, it is essential that the Plan should be supported by a significant degree of additional allocations. Priority should be afforded to sites that have already secured planning permission, with a view to exploring opportunities to unlock additional capacity on the consented sites, including the Horsham Golf and Fitness site.
- 1.10 The Horsham Golf and Fitness site benefits from an extant outline consent for up to 800 dwellings and has therefore been tested through the planning process and found acceptable in principle. The existence

of the consent provides unequivocal evidence of deliverability and suitability, and the site is capable of contributing immediately and materially to the Council's housing land supply at a time when the scale of unmet need is significant and unresolved. In light of this, it would be a perverse decision for the Council not to allocate the site within the Plan.

- 1.11 In light of the removal of water neutrality requirements that previously constrained development quantum, the allocation of the Site would also provide a clear and justified mechanism to explore the optimisation of development capacity. Failure to do so would represent a missed opportunity to make effective use of a consented and deliverable site at this critical stage of the re-examination to address the unmet needs in a timely manner and to avoid any serious deleterious effect on the social, economic and environmental future of Horsham.

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 The Council's Housing Requirement Topic Paper (**HDCJB04**) proposes a stepped approach to the Local Housing Need (LHN) calculation, with the figure for the majority of the Plan period fixed at 819 dwellings per annum ("dpa").
- 2.2 While the intention for a pragmatic approach is noted, we are concerned that the effect of this methodology is to reduce the Council's own housing need figure and, in doing so, moves materially away from the December 2025 Standard Method-derived requirement of 1,338 dpa. The latter represents a significant 63% uplift in the LHN figure and results in a pronounced "cliff edge" within the Plan period when the higher figure is engaged. The stepped approach therefore risks understating housing need at precisely the point where more proactive approaches to addressing housing need have now become most critical.
- 2.3 Unlike neighbouring authorities such as Mid Sussex, Horsham is identified by the Ministry of Housing, Communities & Local Government as being required to 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. As a consequence, Horsham is operating in a fundamentally different position, with two local plan processes running concurrently and overlapping in practical terms.
- 2.4 In light of this overlap, and to ensure that the examined Plan can be found sound as an interim measure, we submit that a higher LHN figure of 890 dpa should be adopted, which will be supported by additional allocations, including consented and deliverable sites such as the Horsham Golf and Fitness site, are fundamentally necessary.
- 2.5 Even if the matter were to be addressed in the forthcoming plan-making process, which we do not agree with, the Plan should be supported by a firm and clear commitment for allocation of consented sites to meet the elevated housing needs, to avoid deferral of resolution of identified housing shortfalls.

Table 4: Housing need over plan period

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

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

- 2.6 We are concerned that the current Plan period extends for only 17 years covering the period between 2023/24 and 2039/40.
- 2.7 Paragraph 22 of the NPPF is clear that strategic policies should look ahead over a minimum period of 15 years from the date of adoption.
- 2.8 The latest Local Development Scheme (**SP03**) indicates that adoption of the Plan is unlikely to occur until approximately May 2027, assuming that all matters of soundness are resolved in a timely and satisfactory manner. This assumption is notably optimistic. Even if this timetable were achieved, the effective Plan period post-adoption would extend to no more than 13 years, which falls materially short of the requirement set out in national policy.
- 2.9 Given that the Council has already commenced work to identify additional allocations for the three growth options, there is no reasonable justification for progressing a Plan with a shortened plan period. As such, our position remains that the Plan should be extended to at least 2042 to cover a minimum of 15 years post-adoption. Rather than lowering the policy ambition, priority should be given to the allocation of major strategic sites with extant planning permission, including the Horsham Golf and Fitness site, with a view to exploring enhanced capacity to ensure the delivery of the full 15-year plan period.

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

- 2.10 The Council's approach to addressing unmet housing need arising from neighbouring authorities, particularly within the Coastal West Sussex Housing Market Area ("HMA"), is not positively prepared and is inadequately supported by the evidence base.
- 2.11 The Housing Requirement Topic Paper (**HDCJB04**) identifies the Coastal West Sussex HMA as a third-order priority on the basis of "*the relatively modest extent to which the Coastal West Sussex HMA relates to Horsham District.*" (Paragraph 11).
- 2.12 While paragraph 16 asserts that "*there is a far less clear pattern of movement between the Coastal HMA and anywhere other than the very southern element of Horsham District (and much of which is located in the South Downs National Park)*", there is no reference within the latest Northern West Sussex Housing Market Area Statement of Common Ground (**HDCJB06**) to substantiate this claim.
- 2.13 In contrast, the Council's own evidence points to a clear functional relationship. The Northern West Sussex Strategic Housing Market Assessment (**H01**) confirms that "*The southern parts of Horsham and Mid Sussex were identified within a Sussex Coast Housing Market Area extending from Chichester to Lewes.*" (Paragraph 3.8).
- 2.14 Internal migration from Brighton and Hove accounted for 539 new arrivals into Horsham District in the year to June 2024, according to the latest Government data (see **Table 1** below), representing the highest level of inward migration to Horsham from outside the Northern West Sussex Strategic Housing Market Area.

Origin - Local Authority Area (Sussex Only)	Destination - Local Authority Area	Total Residents
Crawley	Horsham	880
Mid Sussex	Horsham	568
Brighton and Hove	Horsham	539
Worthing	Horsham	316
Chichester	Horsham	305
Arun	Horsham	265
Adur	Horsham	211
Lewes	Horsham	102
Wealden	Horsham	61
Eastbourne	Horsham	32
Rother	Horsham	27
Hastings	Horsham	10

Table 1 Internal migration estimates (ONS, 2025)

- 2.54 **Table 2** below assesses objectively assessed housing need using the December 2024 Standard Method against each authority's adopted housing requirement. It demonstrates that unmet housing need arising within the Coastal West Sussex HMA is substantial and incapable of being accommodated without assistance from neighbouring authorities, including Horsham.
- 2.55 Notwithstanding the clear functional relationship between the two HMAs, we are concerned that the draft Plan makes no equivalent or proportionate allowance to address unmet need arising from the Coastal West Sussex HMA.
- 2.56 Horsham's approach differs from the approach undertaken by neighbouring authorities. As the Inspector will be aware, the Inspector's Post Hearing Letter to the Mid Sussex District Council's Examination indicates that *"a specific number of homes will be added to the LHN figure to meet a proportion of the unmet housing needs of neighbouring authorities in the same housing market areas, principally Crawley but also having regard to the south coast."* There is no reasonable justification which will preclude a similar approach to be undertaken in Horsham.
- 2.57 In fact, the approach undertaken by Horsham has already raised concerns among coastal authorities, including the Brighton and Hove City Council Statement of Common Ground (**DC07**) and the Arun District Council Statement of Common Ground (**DC16**) as set out in our previous Hearing Statement (**M1.03**).
- 2.58 In the context of the formal withdrawal of water neutrality requirements in Horsham, we submit that the Plan cannot be found sound unless it makes a reasonable and numerically specified contribution towards the declared unmet housing needs of neighbouring coastal authorities.
- 2.59 As such, the Plan should make a clear and proportionate contribution towards meeting the identified unmet housing needs arising from neighbouring coastal authorities. To achieve this, it is imperative for the Plan to allocate additional sites at this stage, with priority given to those which have already secured

planning permission and been comprehensively tested as suitable and deliverable, such as the Horsham Golf and Fitness site.

Housing Market Area Authority	Local Housing Need	Housing Requirement in Adopted Local Plan	Unmet Needs
Brighton and Hove City Council	2,444 dpa	660 dpa	-1,784 dpa
Lewes District Council	829 dpa	345 dpa	-484 dpa
Adur District Council	521 dpa	177 dpa	-344 dpa
Worthing Borough Council	642 dpa	885 dpa	243 dpa
Wealden District Council	1,408 dpa	229 dpa	-1,179 dpa
Tandridge District Council	810 dpa	125 dpa	-685 dpa
			-4,233 dpa

Table 2 – Unmet Needs within Coastal Authorities

d. Whether any other factor should influence the housing requirement

2.60 No comment.

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

2.61 It is a matter of concern that the proposed housing requirement would deliver only approximately 78% of the December 2025 Standard Method figure of 1,338 dwellings per annum, as confirmed by paragraphs 18-19 of **HDCJB04**.

2.62 Paragraph 234(b) of the NPPF is clear that:

“Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.”

2.63 As set out in our submitted Hearing Statement for Matter 2 (Section 6), the Plan, on the basis of the currently identified supply, can in practice deliver no more than approximately 68% of the December 2025 Standard Method requirement, falling significantly below the required threshold. The draft Plan remains unclear as to how this significant shortfall is intended to be effectively addressed.

2.64 In these circumstances, it is imperative for the Plan to be supported by additional site allocations to substantiate its proposed housing requirement. In doing so, priority should be afforded to sites which have already secured planning permission, including the Horsham Golf and Fitness site, which is capable of providing an effective and deliverable means of securing additional capacity.

