

Horsham District Local Plan 2023-2040

Examination Inspector: L Fleming BSc (Hons) MRTPI IHBC

Programme Officer: K Trueman

programmeofficer@horsham.gov.uk

Examination Webpage:

<https://www.horsham.gov.uk/planning/local-plan/local-plan-examination>

5 January 2026

Examination of the Horsham Local Plan 2023-2040

Dear Ms Howe,

Background and Introduction

1. I write in response to your letters dated 4 & 22 December 2025 concerning the Examination of the Horsham Local Plan 2023-2040 (the Plan) (SD01) which was submitted on 26 July 2024. This letter should be read alongside my Interim Findings letter (ID08).
2. Whilst I have recognised some relevant circumstances have changed (ID10, paragraph 2), many of the points previously raised remain valid and ID08 provides background information relevant to the contents of this letter avoiding the need for repetition.
3. As suggested, I will hold an Exploratory/Procedural Meeting (the meeting) with the Council on **26 February 2026**. This will explore with the Council the feasibility and practical arrangements of progressing the Examination. The meeting will take place between me and representatives of the Council. There is no need for any other participants. It should be recorded and placed on the Examination Website as soon as possible so that interested parties can be kept up to date.
4. Informed by your letter of 22 December 2025 and other relevant evidence, I will issue a detailed Agenda and/or Inspector Note(s) in advance of the meeting as necessary. However, as I said I would, to assist the Council's preparation for

the meeting, I set out below a summary of my soundness concerns based on the matters¹ that have already been discussed at hearing sessions so far, insofar as is necessary for the purposes of this letter and the meeting. Furthermore, with the same aim, I also provide some comments on the scope of the main modifications which may be required to make the Plan sound, if that can be achieved.

5. In exploring the feasibility and practical arrangements of progressing the Examination, it is important I make clear to the Council that my role is to examine the Plan and manage the Examination. Whilst I am able to recommend main modifications to the Plan for soundness or legal compliance reasons, it is the Council's role to decide on an appropriate development strategy for its area and prepare a sound and legally compliant Local Plan engaging with all interested parties as appropriate. It is therefore for the Council to set out how it wishes for the Plan to be modified and explain to me how that can reasonably be achieved during the Examination in a timely manner that is fair to all interested parties.
6. In managing the Examination, I will need to decide and keep under review, whether the scope of any work necessary and its associated timescale for completion is appropriate having regard to legal requirements, national policy and pertinent Government statements and written correspondence.

Soundness concerns so far

7. As you acknowledge, the Plan sets a housing requirement which would not meet the local housing need of the district calculated using the standard method. Based on the latest assessment before the Examination it falls short by some 2,275 dwellings. The Council's justification for this fundamentally relies on evidence related to water neutrality and market deliverability/capacity². The same evidence was factored into the Council's sustainability appraisal³ of alternative housing requirements and spatial strategy options and informed the selection of the preferred strategy and sites for allocation in the Plan.
8. Issues associated with water neutrality have clearly created extremely difficult plan preparation conditions for the Council. However, for the reasons I gave in ID08, limiting or capping the number of homes to be provided in the district or ruling sites out for allocation in the Plan at any stage of plan making for reasons relating to water neutrality was and is unsound. Natural England's withdrawal statement (HDC44a) now makes this situation clear.
9. The Council's evidence on market capacity is primarily a review of historical market performance in the district without any substantive consideration of the wider relevant housing market areas. It seems to test, among other things, the deliverability of the Council's housing requirement as detailed in the Plan. It

¹ Provisional Hearing Programme (ID05). Weeks 2 to 4 were cancelled having completed week 1.

² Housing Delivery Studies (H02 dated September 2020 and H03 dated November 2023)

³ SD03a to SD03d and associated non-technical summaries.

does not substantively consider any significantly higher levels of development which could meet or exceed local housing need or any housing market influences from settlements outside of the Horsham district boundary in any significant robust detail. Therefore, this work also does not provide robust evidence to demonstrate that the level of development provided in the district should be restricted or reduced to a figure below local housing need or any other level, particularly, against the background of an acute national housing crisis.

10. There does not seem to be any other evidence before the Examination which could give justified reasons (environmental or otherwise) that provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area (NPPF, paragraph 11). Thus, overall, the Plan's vision, objectives and spatial strategy are not effective in meeting the housing needs of the area. They are not justified by evidence and are not consistent with national policy or positively prepared and the Council's sustainability appraisal is not robust.

The scope of any main modifications and timescales for developing them

11. The existing evidence indicates to me, that the Plan should provide for at least the districts minimum local housing need based on the standard method.
12. I acknowledge that the Council, through a high level review of its trajectory suggest that it can as a minimum meet its own need as an annualised figure of 965 homes per annum through delivering more on sites already identified in the Plan and new site allocations. However, it must also be considered whether the Plan's housing requirement should include an unquantified contribution towards substantial unmet needs arising from neighbouring areas. Historically, Horsham district has made contributions towards meeting unmet needs arising from other local authority areas, particularly those arising from Crawley. Horsham's relationship with Crawley is not adequately recognised in the Plan's spatial strategy.
13. As you acknowledge in your latest letter, a sufficient supply of sites would need to be provided to ensure any increased housing requirement could be met and it will need to be considered whether additional sites need to be allocated for housing development in the Plan through main modifications. However, I must remind the Council, that I have not yet considered all the sites (including their potential yields) which are already proposed for allocation in the Plan at a hearing and some of those sites are subject to numerous representations opposing them. Furthermore, if new allocations are required as you indicate would be necessary through main modifications, there are numerous alternative sites being promoted for development in the district which are not currently included in the Plan.
14. Thus, clearly main modifications will be necessary to increase the housing requirement in the Plan and amend the spatial strategy. However, it is not obvious to me, how the housing requirement and spatial strategy should be modified and which additional sites should be allocated if they are required.

15. If the Examination is to proceed, a full review of the sustainability appraisal (overall requirement, spatial strategy/distribution option and site options appraisal) and new/updated evidence all seem necessary. If new site allocations are necessary, the Council would need to develop an appropriate methodology/process for selecting new sites and discounting those not selected. In the interests of fairness, the Council would need to explain to me how interested parties, particularly local communities and site promoters would be engaged in the extensive programme of work that would seem to be required to achieve a sound and legally compliant local plan.
16. I will need to consider whether the substantive main modifications which could be needed to make the Plan sound, if that is possible, could be regarded to be of such scope that the Plan is fundamentally unsound. Furthermore, accounting for further hearings, new and updated evidence and consultation, I would also need to understand from the Council whether there would be a significant risk that the Examination would continue for an unreasonable length of time.

Conclusion

17. I hope this letter is helpful for the Council to prepare for the meeting. To assist the effectiveness of the meeting, please can the Council provide an initial response to this letter and an updated housing land supply position (including a five-year housing land supply calculation) by no later than **12 February 2026**. That initial response should outline as far as possible a draft programme of works (timetable and scope) which the Council consider would be necessary to progress the Examination and achieve a sound plan as indicated in your letters.
18. I appreciate this deadline may be challenging, if you are unable to meet it, please can you let me know via the Programme Officer accordingly. I am also happy to provide any necessary clarification on the contents of this letter via the Programme Officer in the lead up to the meeting. However, I do not require a response to this letter from representors at this time.

L Fleming

INSPECTOR