

Horsham Local Plan Examination

Matter 1 – The Housing Requirement

Introduction

1. This Hearing Statement has been prepared by Croudace Homes with respect to Matter 1 of the Examination of the Horsham Local Plan 2023-2040 (“the Plan”).
2. It is noted that initial Hearing Sessions took place in December 2024, and that the Hearing Statements prepared to inform the initial sessions can continue to be relied upon. With respect to the Housing Requirement, we note that this was covered by Matter 8 within the initial Hearing Sessions.
3. On this basis and in accordance with the guidance issued by the Inspector with respect to the upcoming Hearing Sessions, this Statement focuses specifically on the questions identified and does not repeat points identified within Croudace Homes’ Matter 8 Hearing Session (dated November 2024), noting that the Inspector will have regard to the November 2024 Hearing Statement.
4. We do not answer each of the questions identified for discussion as part of the Matter 1 Hearing Session within this Statement, but instead focus on those questions where we have additional information to submit.

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

5. As identified by the Council at paragraph 11 of its Housing Requirement Topic Paper (March 2026)¹, the reasoning provided by the Council for not accommodating unmet needs within the submission version of the Plan related purely to the constraint of Water Neutrality. In light of the updated position from Natural England, this is no longer a constraint to development within Horsham District.
6. Accordingly, there is now no reason why the Council cannot accommodate unmet needs from adjoining authorities.
7. The National Planning Policy Framework (“the Framework”)² states at paragraph 11b) that strategic policies should seek to accommodate any needs that cannot be met within neighbouring areas. Footnote 6 of the Framework, relating to paragraph 11b, clarifies that the extent of unmet need should be established through statements of common ground.
8. Paragraph 11 of the Housing Requirement Topic Paper subsequently sets out a hierarchy for delivering housing needs through the Plan, as follows:
 1. Meet Horsham’s needs in full
 2. Meet wider housing needs from the North West Sussex Housing Market Area
 3. Meet wider housing needs from the Coastal West Sussex Housing Market Area
9. Table 5 of the Housing Requirements Topic Paper identifies a net level of unmet housing need of 5,812 dwellings across the North West Sussex Housing Market Area. Paragraph 13 subsequently states that the Council is testing the extent to which the Plan can accommodate half of Crawley’s unmet needs – 3,753 homes. However, this would leave a residual 2,059 dwellings of unmet need. No justification is provided to explain why the residual quantum of unmet need cannot be accommodated by the Plan.

¹ Document reference HDCJB04

² December 2023 version, noting that this was the latest version in place when the Plan was submitted for Examination in July 2024

10. It is clear from the Housing Requirement Topic Paper that the Council does not intend to test accommodating unmet needs from the Coastal West Sussex Housing Market Area. Paragraph 16 of the Housing Requirement Topic Paper outlines that this is because “*there is a far less clear pattern of movement between the Coastal HMA and anywhere other than the very southern extent of Horsham District.*”
11. The above should be noted in the context that statements of common ground dated July 2024 with Brighton and Hove and Arun District Council’s³ indicated clearly that these authorities considered it appropriate for Horsham District to accommodate unmet needs.
12. In terms of the pattern of movements between the southern part of Horsham District and the South Coast Authorities, Census data demonstrates that a large number of people travel from Horsham District to Brighton and Hove, Worthing and Chichester Districts for work⁴. Moreover, Tier 2 settlements (as identified by the submission version of the Plan) in the southern parts of Horsham District have frequent and short public transport connections to larger settlements on the South Coast – e.g. a half-hourly bus service is available from Henfield to Brighton, and this journey takes circa 40 minutes (approximately the same time as a journey from Henfield to Horsham).
13. Therefore, the Council’s insinuation that there are limited movements between the settlements in the southern portion of Horsham District and Coastal Authorities is not justified.

Question d. Whether any other factor should influence the housing requirement

14. Noting that the submission draft of the Plan identified a Plan period of 2023-2040, this does not provide for the “*minimum 15-year period from adoption*” required by paragraph 22 of the Framework. The Council’s latest Local Development Scheme⁵ identifies a period of 13 months from the resumption of the Examination and the adoption of the Plan. Whilst the dates have slipped, this indicates that the Council does not expect for the Plan to progress through Examination and be adopted before April 2027.
15. The Council does not acknowledge the need to update the Plan-period to avoid conflict with the Framework within the documentation published since the previous Inspector’s initial findings were issued in April 2025⁶, at which point it was abundantly clear that the Plan would not be adopted in 2025. It is a concern that the Council does not appear to recognise this clear soundness issue.
16. To ensure consistency with the Framework, the Plan period should be extended to *at least* 2042. The housing requirement should be adjusted accordingly.
17. It is also notable that the Council has identified within paragraph 18 of the Housing Requirement Topic Paper that the housing requirement it has identified for the period up to 2040 – 17,828 dwellings – only meets 78% of the December 2025 minimum Local Housing Need figure. Given that the December 2024 version of the Framework⁷ identifies that there is no need to undertake an immediate review if an emerging Local Plan that is proceeding under the transitional arrangements meets 80% of the minimum LHN, it is unclear why the Plan is not seeking to increase its housing requirement to avoid the need to undertake an immediate review.

³ Document references DC07 and DC16

⁴ [Location of usual residence and place of work by method of travel to work - Nomis - Official Census and Labour Market Statistics](#)

⁵ [Horsham District Council User Guide](#)

⁶ Notably – document references HDC46, HDCJB01, HDCJB01a, HDCJB04 and HDCJB04a

⁷ Paragraph 236

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

18. Notwithstanding our response to Question c, for the purposes of responding to this question we have taken the Council's position with respect to accommodating unmet needs. However, the matter of unmet needs requires detailed consideration through the examination of the Plan.
19. Based purely on adding an additional two-years to the minimum housing requirement to ensure that a minimum of 15-years post-adoption of the Plan is accommodated by the Plan-period, which is a requirement of the Framework and, consequently, a soundness test; the minimum housing requirement for the Plan should be increased from the 17,828 dwelling figure identified by Table 6 of the Council's Housing Requirement Topic Paper⁸, to **19,466**.
20. This is an increase of 1,638 dwellings and is based on adding the average of 819 dwellings per annum figure⁹ that is identified by the Council at Table 3 of the Housing Requirement Topic Paper.

⁸ Document reference HDCJB04

⁹ Which accounts for a reduction from the South Downs National Park areas of Horsham District



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