

Examination into the soundness of the Horsham District Local Plan 2023-2040

GUIDANCE NOTE FROM THE INSPECTOR

The following note is guidance for Weeks 2 and 3 of the hearings into the above plan, commencing at 10:00 on Tuesday 13 October 2026. (Week 1 of the hearings took place from Tuesday 21 April 2026.) The hearings form part of my examination into the soundness of the Plan.

Introduction

1. I am the Planning Inspector appointed by the Secretary of State for Communities and Local Government to examine the soundness of the Horsham District Local Plan 2023-2040. I have prepared this guidance note. Its purpose is to explain the procedural and administrative matters relating to the examination.
2. The Programme Officers (POs) for the Examination are **Kerry Trueman** and **Ian Bussey**. They are acting as independent officers for the examination, under my direction. They will be responsible for organising the programme of hearings, maintaining the examination library, recording and circulating all material received, and assisting me with procedural and administrative matters. They will also advise on any programming and procedural queries. Any matters that the Council or representors wish to raise with me should be addressed to the Programme Officers. They can be contacted at programmeofficer@horsham.gov.uk.
3. Information about the progress of the examination and links to documents are provided on Horsham District Council's website:

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

The Inspector's role

4. My task is to consider the soundness and legal compliance of the plan, on the basis of the relevant legislation and the guidance in the National Planning Policy Framework (the NPPF). By virtue of the transitional arrangements in paragraphs 234 and 235 of the 2024 version of the NPPF, the relevant national planning policies under which the plan will be examined are those of the December 2023 Framework.
5. I am examining the Plan to determine whether it is:
 - (a) positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
 - (b) justified – an appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
 - (c) effective – deliverable over its period and based on effective joint working;
 - (d) consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF's policies.
6. Further details of the examination process are set out in Procedure Guide for Local Plan Examinations.

<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

See <https://www.gov.uk/government/collections/local-plans-guidance-and-information-from-the-planning-inspectorate> for details of where to find this document and other useful publications and advice.

7. The plan was submitted for examination on 26 July 2024. I was appointed to examine the plan on 28 January 2026 in place of the previous Inspector, Luke Fleming.

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8. Although some hearings were conducted by the previous Inspector, I have started the examination afresh, and my starting point for the examination is that the Council have submitted what they consider to be a sound plan, as the NPPF requires. Those seeking changes must demonstrate why they consider the plan to be unsound, by reference to one or more of the tests of soundness.
9. I will seek to address unresolved issues concerning the soundness or legal compliance of the plan through the examination hearings, and through consideration of written submissions. It should be emphasised that my role is not to improve the plan, but to determine whether or not it meets the soundness tests.
10. The plan was submitted under the constraints imposed by the requirement for water neutrality, which meant that it did not make full provision for local housing need. The water neutrality issue has subsequently been addressed, and this has changed the context for the examination.
11. I held a first week of hearings beginning on 21 April 2026. These considered the housing requirement, housing supply, homes for all groups of people in the community, and business, industrial and commercial needs.
12. Following the hearings, I wrote to the Council on 5 May 2026 (Document IDJB05) with my initial findings and gave preliminary advice. The key points were:
 - The plan should meet local housing need in full, calculated using the methodology that existed at the time of the December 2023 NPPF and updated using the most recent evidence.
 - The plan should accommodate half of the unmet housing need from Crawley as identified in its local plan, the other half being accommodated in Mid Sussex District.
 - The plan should include an allowance for some of the unmet housing need arising on the south coast. In this regard the Council were proposing to use a methodology being developed by Mid Sussex.
 - There were a number of other policy points listed in my letter.
 - I also held a separate written dialogue with the Council on the subject of the plan's development management policies.
13. Taking my initial findings into account, the Council is proposing a main modification to raise the plan's housing requirement to 18,712 homes for the plan period to 2040. To meet the requirement, the Council has carried out further additional site appraisal and selection, sustainability appraisal and other necessary work, and has produced updated supporting documents.
14. The outcome of this process is that the Council is proposing to include a further strategic development site at Adversane. It has also identified additional land for housing at Billingshurst, Ashington, Kilnwood Vale and some smaller sites, and has revised upwards the expected housing delivery during the plan period on the strategic sites at Land West of Ifield and Land North West of Southwater as well as at Land North of Horsham which was allocated in the 2015 Horsham District Planning Framework.
15. These proposed changes to the plan are all contained within the draft schedule of main modifications along with a number of wording alterations to the policies and supporting text.
16. Main modifications are changes that are required to make the plan sound. The proposed main modifications were subject to public consultation from 13 July 2026 to 24 August 2026.

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Focus of the hearings

17. The content of the hearings is set out in full in the accompanying draft hearing agendas and is summarised in the draft hearing programme. The agendas cover the matters and issues that I want to discuss, so I have not issued a separate matters and issues document.
18. The focus will be on the soundness of the spatial strategy and the larger site allocations.
19. If I have questions about the smaller allocations, I will put them to the Council in writing.
20. As regards the spatial strategy, the hearings will cover the proposed distribution of development, in relation to housing need, the settlement hierarchy, transport networks, access to employment, social and community facilities, environment and deliverability.
21. As regards the larger site allocations, the hearings will consider the soundness of the Council's chosen sites, both those in the submitted plan and those included in the draft main modifications schedule.
22. There will not be any discussion about the relative merits of omission sites such as Buck Barn or Land West of Billingshurst. Site selection is the Council's task, both in the submitted plan and at the main modifications stage, subject to meeting the soundness criteria.
23. The hearings will not re-visit the issue of the housing requirement and the stepped trajectory. These were discussed in the hearings that took place beginning 21 April 2026 and I have taken into account all the representations on these matters. I consider that the housing requirement and the trajectory as put forward by the Council in the draft schedule of main modifications are appropriate responses to my letter of 5 May 2026. I shall deal with these matters in my report.
24. The main modifications consultation gave rise to a number of other comments about wording. I may have questions about some of the issues raised and will deal with these in writing with the Council.

Progressing your representations

25. It is not necessary to appear at the hearings in order to have your views considered. I have read all the written representations and I will give them the same consideration as verbal representations at the hearings.
26. Participation at a hearing session will only be helpful if you can contribute positively to a discussion concerning the soundness or legal compliance of the plan.
27. **If you want to participate in a particular hearing session you must inform the Programme Officer by 17:00 22 September 2026 stating which session(s) you wish to participate in.** No request to appear at hearing sessions will be accepted after that date, other than in special circumstances.
28. In stating which sessions you wish to attend, please will you focus on the particular session or sessions that are most relevant to your representation. This is necessary in the interests of efficiency and fairness to others, and it helps the Programme Officer to organise attendance lists.
29. The right to participate in a hearing extends only to those who have proposed changes to the plan in order to make it sound and legally compliant. There is no need for those who have supported the plan to take part in the hearings. However, it is helpful for the promoters of large site allocations to be represented at the hearings because they may assist in answering questions and clarifying or updating evidence. I may invite additional participants to participate in the hearings where I think they are needed to enable the soundness of the Plan to be determined.

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30. For participants in the hearings, further written material may be submitted in the form of a hearing statement. This should be limited to responding to the matters I have identified in the attached draft agenda. Further details regarding hearing statements are set out below.
31. Those who wish to proceed by written means can rely on what they have already submitted. The original representations should have included all the points and evidence necessary to substantiate them, so there will be no need to submit further material based on the original representations.

The hearing sessions

32. The hearing sessions for the examination will take place at the following location:

**Albery House
Springfield Road
Horsham
RH12 2GB**

33. Draft agendas for the hearings and a summary programme are being issued at the same time as this guidance note. They may be updated if necessary before the hearing sessions. The programme may also be amended, so participants should check the Council's website for any changes.
34. The hearings will take the form of a series of discussions based on the matters that I have identified in the agendas. They will concentrate only on the major topics; many of the more detailed matters are being dealt with in writing.
35. I will lead the hearings and go through the identified topics by means of a structured discussion. This will be in the form of questions from myself and responses from the participants. I will concentrate on the issues that I need to hear more about. The emphasis will be on testing for soundness. The aim of the hearings is to enable me to gain the information necessary to come to a firm conclusion and decision on the agenda items.
36. Please take careful note of the following bullet points.
 - Participation is arranged through the Programme Officer. In the interests of efficiency the Programme Officer and I will seek to allocate participants to sessions where we consider they would make the most effective contribution.
 - Where several different people or groups have submitted similar representations on the same matter, the Programme Officer will ask prospective participants to nominate a single spokesperson.
 - Short hearing statements will be welcomed (see below for details).
 - There will be no formal presentation of evidence, as I will have read all the relevant representations and statements beforehand, and will expect all the other participants to have done so.
 - There is no cross-examination and is very common for people to participate without professional or legal representation.
 - However, participants may be supported by legal and professional experts if they wish, who will be treated as part of their team.
 - In the interests of efficiency it may be necessary to restrict the number of participating individuals from each team. Participants should nominate one well-briefed spokesperson to

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speaking for them. Exceptions to this will be made where barristers have been appointed or where two or three technical experts are necessary to explain the evidence.

- The hearings will be inquisitorial rather than adversarial and will be short and focused with careful control over the discussion and the time taken.
- For each topic or sub-topic I will set out the matters to be covered and then invite individuals to make their contribution in response to the points I have raised.
- Be aware that for some topics I may go round the table only once.
- Counter argument is acceptable where it adds to the evidence but contradiction for the sake of it is not encouraged.
- I will intervene to stop the unnecessary repetition of points.
- Participants should respond to the questions raised rather than simply reading out their already submitted written representations.
- All participants will have an equal opportunity to contribute but for each topic the Council will have the final say.
- No more evidence can be submitted once the hearing session has closed, except with my agreement.

The hearing timetable

37. The hearings will open at 10.00am on Tuesday 13 October 2026. They are anticipated to run from 13 October to 16 October and from 20 October to 23 October.
38. The hearing sessions will normally start at 10.00am and 2.00pm each day, but these times may vary if longer or shorter sessions are necessary. Short breaks will be taken at convenient points in the mid-morning and mid-afternoon, and lunch will usually be taken at about 1.00pm.
39. It is the responsibility of individual participants to ensure that they are present at the correct time and are fully committed to attend the whole hearing session to which they have been invited; latecomers may not be admitted.
40. The proceedings of each hearing session will be streamed and recorded and will be accessible from the [Council's YouTube Channel](#). This will allow those who wish to follow the hearings but who are not invited as participants to follow the discussions.

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

41. Documents prepared by the Council are available to view on, or download from, the Council's website. As additional examination documents are produced, including participants' hearing statements, they will be added to the library. The library will therefore include all the documents that you are likely to need to refer to. If anyone is in any difficulty gaining access to documentation, please contact the Programme Officer.

Hearing statements

42. The following provisions should be carefully read and followed. Otherwise statements will be returned.

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43. Short written statements may be produced by each representor. There should be one separate statement for each matter. Each statement can cover any of the issues identified in the hearing agendas but should not stray beyond those issues. Written statements for the hearings must be:
- clearly headed with the name of the representor;
 - limited to no more than 3,000 words per matter (except for those produced by the Council), but additional relevant appendices may be attached;
 - confined to the issues and questions that I have identified;
 - no longer than is necessary to deal with their subject matter;
 - clearly related to the original representation whilst avoiding unnecessary repetition.
44. Hearing statements from all participants for the first week of hearings should be emailed to the Programme Officer to arrive by **17:00 Friday 25 September 2026**. All participants should adhere to the timetable for submitting statements.
45. It is helpful for statements to be based on the most recent evidence.
46. Late submissions and additional material (other than that invited by the Inspector) are unlikely to be accepted on the day of the relevant session. If material is not received by the deadlines stated below, the Programme Officer will assume that you are relying only on the original representations.
47. Please email electronic versions of all statements and appendices to the Programme Officer in Word or PDF format: programmeofficer@horsham.gov.uk
48. Please only submit appendices to statements where they are essential. The statement should make it clear why they are relevant. Appendices should have a contents page and be paginated throughout. They do not need to contain extracts from any publication that is already before the examination, provided the relevant parts of those documents are adequately cross-referenced. The 3,000-word limit does not apply to appendices, but they should respect the aim of succinctness.
49. The Council must produce statements dealing with all my issues and questions. The Council's statements are not subject to the 3,000-word limit, but they should still be succinct.
50. Hearing statements will be posted on the Examination website, so that they are available to all participants and anyone else who wishes to read them. They will not be circulated directly to participants.

Statements of common ground

51. Where relevant, the Council and participants are strongly encouraged jointly to produce statements of common ground, to assist with the understanding of relevant matters, clarify where there is agreement, and to identify or resolve areas of dispute. These will enable the hearing to concentrate on the key issues that need further testing to establish whether the plan is sound. They could, for example, include agreed wording of a suggested change to a policy, agreed factual information, or clearly-identified points of disagreement. Statements of common ground should be submitted by **17:00 Friday 25 September 2026**. I may accept a statement of common ground beyond this date as an exception should it help to clarify a particular matter.

Site visits

52. I will undertake site visits relevant to the examination. These will generally take place unaccompanied by any other parties, unless I need to arrange access to private land.

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Closing the examination

53. The examination will remain open until my report is submitted to the Council. However, no further representation or evidence will be accepted after the final hearing sessions have closed, unless I specifically request it. Any late unsolicited material will be returned.

Finally

54. I emphasise:

- I will have equal regard to representations made in writing and those made orally at the hearings;
- any further statements must focus on the agenda items and my questions and there must be separate statements for each matter;
- be aware of the need for succinctness, respecting the letter and spirit of the 3,000 word limit, and the other requirements; and
- the deadline for the submission of statements must be adhered to.

Jonathan Bore

INSPECTOR

4 September 2026

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ANNEX A

Sources of relevant documents and advice

A. The Council's website

All documents and information for the Local Plan examination are available on the Council's website at:

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

Please contact the Programme Officer if you have any difficulty accessing or locating documentation.

B. Relevant legislation

These documents can be searched for and found at: <https://www.legislation.gov.uk>:

C. Guidance from the Planning Inspectorate

[Procedure Guide for Local Plan Examinations](https://www.legislation.gov.uk) (August 2026). This can also be found at <https://www.legislation.gov.uk>