Horsham District Council Local Plan 2023-2040 Hearing Closing Statement

22 October 2026

Paul Shadarevian KC acting for Horsham District Council

Thank you for the opportunity to make a closing statement. The Council has where appropriate and necessary made our response to oral representations clear and given your undisputedly comprehensive understanding of the evidence and the issues raised, I'm sure you would not be assisted by that approach so I'm going to make some overriding submissions about the Council's position, about the soundness of the plan and about process.

I would say this first of all, the challenges from third parties' objectors to the plan have not revealed any material flaws in the evidence base, as updated, for the increase in housing numbers and as a means of supporting and justifying the spatial strategy as promoted, including the promotion of the strategic sites. The draft plan, as modified, responds appropriately to the considerable environmental and other constraints which exist within the district, having regard to the policy invective to increase the supply of housing in line with our promise earlier in the year to make provision for that in the plan. Such further modifications as may be required to the plan will serve to respond in part to some of the objectors concerns and also to provide clarification so as to improve effectiveness for development management purposes in the future. None of them are redolent of a need to remedy a material underline unsoundness or failure.

The Sustainability Appraisal Update, or as updated, withstands criticism in my submission. It has not been seriously challenged or undermined by any objection. It supports and informs the decision to pursue this strategy as the Council's preferred alternative and in my submission the reasons given in the SA perform their function appropriately and adequately for this purpose. That's all I'm going to say about the merit's sir.

In terms of process, I would like to say this, the guarantee of fairness this process is intended to promote and engender depends upon the influence and authority of the appointed Inspector. This is key. We, and I'm confident others, all others engaged in this process greatly appreciate the experience and intellectual rigor you have brought to bear on this process, and which has brought us to this position from a place of some considerable difficulty. We are grateful to you sir, irrespective of the outcome of this process.

The Council and the professional team, who have worked in a highly professional and objective manner to bring forward the main modifications with an appropriately updated evidence base have worked extraordinarily hard in this behalf and prosecuting

the promise given to you earlier in the year, and we shall continue to do all we can to assist you in the remaining stages of this examination. More than that I cannot say at this stage, but I express our gratitude to you for the stewardship of this examination so far.