

Mr Luke Fleming BSc (Hons) MRTPI IHBC

By email to: [programmeofficer@horsham.gov.uk](mailto:programmeofficer@horsham.gov.uk)

22 December 2025

Dear Mr Fleming,

**Re: Examination of the Horsham Local Plan 2023-40: next steps for 2026**

Further to my letter dated 4 December 2025, I write to draw your attention to provide some key information and updates to assist the next steps in the Examination of the Horsham District Local Plan. This is based on the remarks you have sought thus far to provide us on the issues of soundness which, in consequence, we assume, are capable of being cured through the examination process should it continue.

Procedural/exploratory meeting

1. Having confirmed its wish to resume hearings and its agreement to a procedural / exploratory meeting the Council has considered further matters of timing and meeting format. We are conscious that a year has now passed since hearings were adjourned and are therefore of the view that in light of Minister Matthew Pennycook's letter of 9 October 2025, which made clear that Inspectors should approach examinations of current system plans with the appropriate degree of flexibility, all parties should be committed to holding the exploratory/procedural meeting as soon as possible and no later than February 2026. Please note that Council's preference is for an in-person discussion.
2. In order to expedite matters, the Council considers it is helpful to set out its reasoning as to why it considers this Plan can and should be progressed. These are to be read alongside our earlier letters to you, referenced HDC43 and HDC44.

Approach to Plan modification – housing targets

3. The NPPF (December 2023) Standard Method housing need figure for the plan period 2023/24 to 2039/40 is 911 per annum (16,398 homes over the 17-year plan period). In recent weeks, the Council has undertaken a high-level review of its housing trajectory to establish how it can best optimise housing delivery. The review also takes account of a now more positive national policy framework and regulatory regime which is expected to accelerate housing supply in the medium to longer term. Through the following measures, the Council now anticipates it can as a minimum meet its own need as an annualised figure of 965 homes per annum through both:
  - a. Intensification on existing allocations and review of delivery timescales on committed sites, following the removal of the water neutrality restrictions.
  - b. New site allocations. This includes new strategic and larger edge of settlement allocations, together with the allocation of some additional smaller sites to meet more local housing needs.

4. As there have been four years of water neutrality with limited permissions, the inevitable consequence for housing delivery is a short-term period with a more limited number of completions, whilst new applications are received and site preparation works are undertaken. Notwithstanding this, there is an opportunity to deliver significant levels of housing annually, particularly in the mid - latter half of the Plan period which not only exceed the NPPF 2023 standard housing target, but also broadly meet the higher NPPF December 2024 standard housing target. It is the Councils view that it is critical that this level of growth is established through a local plan as quickly as possible, rather than recommencing this process through the new regulatory system.

#### Timetable for examination

5. As you have acknowledged in your Interim Findings Letter (ID08) the Council has already prepared and published a suite of 'good and comprehensive' evidence documents. This evidence includes site assessments and Sustainability Appraisal (incorporating SEA) for a large number of sites than those included in the submission plan. Cumulative impacts of higher growth quanta have also been tested. The sites in question have also been the subject of public consultation either at Regulation 18 and / or at Regulation 19. Subject to necessary refinement, this evidence makes feasible the allocation of further sites.
6. The Council has undertaken an initial assessment of timescales for updating evidence to enable the allocation of additional sites and increasing the supply of housing. We have identified the core elements of the evidence base that would need updating. In addition to work on housing deliver and supply, it is considered additional focused work on potential sites, infrastructure delivery and transport updates would be required along with updates to the SA/SEA and HRA.
7. The Council has identified the need to have an up-to-date local plan as a strategic priority and therefore has a well-resourced team to support plan preparation. The Council is able to progress much of this work with immediate effect. The Council is also fortunate to have partner consultants with whom we have established relationships and who have already indicated they would be in a position to assist the Council. These consultancies are part of a Council-adopted procurement framework which facilitates rapid commissioning of work on a flexible basis. Informal consultation on proposed additional sites could take place concurrently to the evidence base updates.
8. Whilst the Council has been undertaking work to identify how it can address the principal soundness concerns relating to housing targets, we note your stated intention to provide further letter and feedback. We recognise that this may therefore require some additional work in addition to that which has already been identified by the authority. Therefore, we see the timetable commencing at the point when we have reasonable certainty of your specific soundness concerns, and can finalise the necessary evidence base updates to address these concerns. However, we would be dismayed if the efficacy of our proposals should be undermined (because of other commitments) by your practicable inability to take on this process in a timely matter, in which case PINS should be directly engaged to deal with this on an urgent basis in the public interest.
9. In summary, the Council is well placed to undertake work on the evidence for the Plan on an accelerated timescale. Provided that your own work schedule permits (and that of the Programme Officer), there is limited reason to doubt that the necessary work and hearings can complete within a 6-month period. This would enable adoption of the plan in 2027. If your own availability and work schedule should prevent this, it is, in our respectful view, incumbent on PINS alternatively to resource this in a timely manner by the appointment of another Inspector.

## Planning need to proceed with hearings

10. It is considered that without continuation of the local plan examination, the Government's stated desire, as supported by the Planning Inspectorate, for local authorities to have an up-to-date plan in place as a basis for sustainable decision-making, and for the plan-led approach to remain the cornerstone of our planning system will be compromised. The Council shares this view.
11. A key purpose of a Local Plan is to make sure the right housing and infrastructure is delivered to support thriving, sustainable communities. Over at least the next two years the Council is expecting to receive a number of significant development applications. Without an up-to-date plan, Horsham District risks losing control over speculative development, which inevitably puts pressure on roads, schools, healthcare, and other essential services and adversely affecting both existing and future residents of the district. We believe that the only way to sustainably and coherently deliver housing at scale is through a plan-led approach, and not through poorly controlled speculative development, on a strategic scale.
12. Our Infrastructure Delivery Plan (IDP) shows clear evidence of urgent infrastructure needs including new secondary and primary schools, improvements to major road junctions, expanded healthcare provision, and better local facilities. Infrastructure providers rely on the Local Plan to understand where and when growth will happen so they can plan and fund these services effectively. They have informally expressed to the Council that the submission draft local plan has, despite its limited weight in planning terms been highly beneficial in framing discussions with site promoters on development proposals and being able to plan for provision of facilities. It goes without saying that local plans affect real lives. Without this a clear plan and ability to plan for future infrastructure, there is a very real risk is that development happens without the schools, roads, and services that people need and deserve. In practice this means that young children will face to travel long distances to access a school place, adversely affecting their education, or families could struggle to access local healthcare, and communities may miss out on the sports and leisure facilities they need.
13. In addition, the adoption of this Plan will provide a solid foundation for the preparation of a new local plan under the new planning system. The Council understands that it will be required to formally commence a new local plan by 31 October 2026 (with Notice to Commence on or by 30 June 2026). The statutory 30-month framework implies a date of adoption of the new plan, at very earliest, of March 2029. This is complicated by the fact that any new plan will be adopted by the new unitary authority, for which the geographies are not yet known. This has meant that to date it has not been possible to have any meaningful discussion as to how best to prepare a unitary development plan.
14. If the Council can start this process from the position of having 'banked' multiple site allocations providing a housing supply for a 10-15 year period, there will be a clear foundation for further plan making taking into account the revised requirements of the new NPPF. The certainty of an existing plan will enable the new unitary to commence plan making on a known and secure footing rather than fettering place making from the outset and would greatly facilitate new local plan production, enabling a continuum of the work already done and recently interrogated at examination.

### Closing remarks

15. In summary, there is every reason in the public interest to continue the examination and to introduce modifications to the Plan which would ensure the full housing needs of the District are met within the Plan period and which is eminently capable of being supported by a robust evidence base. The above paragraphs demonstrate that the Council has already undertaken work on addressing your evident concern regarding housing supply from allocations as currently presented, thus indicating resolution of this issue within a reasonable timeframe and is in a position to provide further detail to you on this initial high level exercise in short order.
16. In summary, the case for continuing the examination in the public interest is compelling as it is the only way to establish certainty for developers and other stakeholders in the medium term – the alternative is to continue to operate in a planning vacuum until at least 2028/29. The case gains still greater weight when considering the risks of not progressing the Plan in the context of Local Government Reorganisation. This means that work on any new (existing) District-level local plan may be abortive should alternative preparation of joint unitary council local plans ultimately be favoured.
17. We trust that this letter is of assistance and look forward to your response and your confirmation of next steps as soon as possible.

Yours sincerely,



**Catherine Howe**  
Head of Strategic Planning  
Horsham District Council