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Inspector Jonathan Bore MRTPI
c/o Kerry Trueman, Programme Officer
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Thursday, 23 April 2026

RE: Examination of the Horsham District Local Plan 2023-2040, Hearings: week 1

Dear Mr. Bore,

Firstly, I'd like to pay tribute to the outstanding efforts of Horsham District Council planning officers who have worked so hard to bring this plan forward. At times it's felt like the whole world was conspiring to prevent us from getting the job done.

I'd also like to thank Housing Minister Matthew Pennycook for meeting with me on many occasions as we tried to solve Horsham's unique planning problems, especially with regard to Water Neutrality, which were wholly neglected under the previous government. I don't agree with the Minister's overall strategy for solving the affordability crisis but I am grateful for his attention he has given to the needs of a single district.

As is often the case across the country, getting approval for any kind of plan has been an enormous political challenge. The plan as we see today is based on the multiple drafts that were made under the previous Conservative administration at HDC, but with improvements under the current Liberal Democrat-led council, especially with regard to environmental protections.

In my previous role as an HDC councillor, I was Cabinet Member for Planning when this plan was first submitted.

Whatever else is in the plan, the aspect that gets all the attention is always the housing target and the location of sites. I am wholly supportive of the need for more affordable housing and I judge the current plan mainly by that yardstick. I also strongly believe in working as hard as possible to achieve public consent. Unfortunately, the planning system as it has operated for the last 10 years makes this nigh on impossible.

The decade long gestation period for this plan has made public understanding and consent all the more difficult to obtain, because people have literally forgotten about past consultation exercises. However, it's important to note that all the sites currently included were also in earlier versions submitted and consulted on under the previous administration.

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As a result, the plan we see today remains based on principles laid down a decade ago. The original intention was to share development widely across multiple settlements. However, as government-mandated targets have risen ever higher, HDC has been required to set very rapid levels of expansion in multiple settlements, such as Southwater, Billingshurst and Rusper parish as a whole. Even a hundred new permissions can seem like a lot if the settlement is only a few hundred houses strong in the first place. Developments are forced to rely on the same limited transport options, the A24 and the A29, because there is no budget for major transport infrastructure.

The main negative of this strategy is that the expansion has been occurring mainly on the edges of existing settlements. In other words, we're building an excess of low density garden suburbs. By their nature they tend to be more expensive, which makes it harder to achieve affordability targets. Furthermore, they are more likely to be required to piggy-back off existing services. This matters, because the ever-increasing pressure on services such as schools and clinics is the other main cause of public opposition to new housing, alongside the loss of green spaces.

On multiple occasions, key local infrastructure such as schools and clinics has been promised alongside new development, but not delivered. This is usually the fault not of developers or the council, but national bodies such as the Dept of Education and the ICBs. At the time planning approval is granted they say they're in support. But when it comes to be built, they withdraw support because it's cheaper for them to force more children into existing schools, or more patients into existing GPs. I attempted to amend the recent Planning & Infrastructure Bill to prevent this, but my amendment was rejected by the government

Returning to the issue of targets: I argue that it would be better if the housing target for today was set at a relatively modest level, in order to give time in a future plan to find sites where greater housing densities are possible. If we could achieve the same number of housing units on half the land area it would help protect our precious rural environment. Crucially, it would also make it easier to achieve affordability.

By building more densely in one or two locations, it becomes possible to set growth targets in most locations at levels already agreed on in Neighbourhood Plans.

There are few things that cause more public anger with the planning process than the confusion over Neighbourhood Plan targets. Residents feel that the plans they voted on and supported are being over-ruled by central targets. Confusingly, individual sites which have been rejected in Neighbourhood Plans are frequently included anyway in the Local Plan.

The Neighbourhood Plan concept was launched under the Coalition government. I support it as a means of maximising public consent. Unfortunately the system has been completely contradicted and confused by the later introduction of the Standard Method under the Conservatives in 2018 which sets a target for the whole district. In areas like Horsham, the Local Plan target is many times higher than all the Neighbourhood targets put together.

The result is that extra sites have to be imposed, over and above those in all the Neighbourhood plans.

The Standard Method is a mathematical formula which uses local wages versus local house prices to calculate an affordability ratio. It was intended to be an accurate and objective way to estimate local housing need. In practice it has been a very poor way to identify housing need and has led directly to eccentric and frankly unbuildable local targets.

As I have argued in Parliament, the Standard Method is itself the principal reason we can't build enough houses and we can't solve the affordability crisis. It didn't work under the Tories, and there's no prospect it will work any better under Labour. The estimated 1.4 million unbuilt permissions across the country are a consequence not of land-banking but locking in high land prices that inhibit build out. Developers will never sell houses if the market drops below cost price. So they simply stop building. This is a logical and indeed inevitable response in a free market, but it is the fundamental reason why 'build, baby build' is not by itself an answer to the affordability crisis.

Scattering housing permissions like confetti across the country has done nothing to bring down prices. The new houses are on average more expensive than the existing stock. So it's a matter of basic maths that the more we build, the worse our affordability ratio will become, and the more will be asked to build. This is the exact opposite outcome of what the Standard Method was supposed to achieve.

In areas like Horsham, all we're doing is locking in inflated land prices into the future. We're tying the hands of future administrations and preventing them from pursuing a strategy that might actually reduce prices in real life.

The supreme irony is that the current planning system actively prevents an area like Horsham District from building more homes for social rent. If HDC tried to set an ambitious total for social housing, the plan would fail inspection because it would be deemed to be setting unreasonable financial demands on housebuilders.

And now I come to the problems created by Water Neutrality which have made growing our community so difficult. The result is that over the last few years HDC went from being an exemplary council in housebuilding to one of the worst in the country.

The injustice for is that 4 years from Sept 2021, Horsham District Council was faced with the impossible task of obeying two entirely contradictory laws. One law said Horsham District must build at least 900 houses a year. The other law insisted we're not allowed to build any houses at all if they used more water.

But only one of those laws was admissible in planning hearings. Horsham District has been punished for not meeting a target it's not allowed to meet. It's been literally against the law for us to obey the law.

As a result, the 'titled balance' under Paragraph 11d of the NPPF continues to apply. Horsham District has been vulnerable to multiple speculative applications. Most notable of these is the Horsham Golf & Fitness site for 800 houses between Horsham and Southwater.

This site is in direct contradiction of Horsham's planning strategy. It's got no school or facilities, it's the wrong side of the A24, and it compromises the roll-out of sites that are in the plan to the west of Southwater. Across the district, we have so many large sites that are very close together. We're consenting new sites next to existing permissions which have failed to complete build out over as much as a decade. There's no doubt that a further extensive round of permissions will have a serious impact on the build out rate, whatever optimistic noises developers may make today.

Horsham's continued status operating under the titled balance is undermining the entire Local Plan strategy. I have raised this with the Minister on many occasions. He accepts the argument in principle but has been unwilling to intervene directly in something that only affects a single planning area. In my view, he has significantly under-estimated the damage it is doing to forming a coherent development strategy.

None of this is Horsham's fault. I hope these circumstances will be taken into account in setting a new housebuilding target for the district. We are once again being asked to take on a very significant quota to cover Crawley's unmet needs. I know that there is also pressure for HDC to take on a further quota for the south coast, despite it being very separate economically. As I have outline earlier, I believe that locking in the high land prices that underlie all the current applications will not benefit Horsham's affordability in the long run, which after all is the key objective.

In particular, I strongly support the Council's strategy for a stepped target. Restarting building from such a low base after Water Neutrality is going to be slow. It will take years to regain momentum. A high target in the early years would condemn HDC to almost certain failure. In turn, this would deny local residents the whole appeal of plan led development, which is to give them some kind of agency in the future of their own district.

I will always support the need for maximum public consent. In the end, I believe it leads to better homes and better living places.

Best wishes,

A handwritten signature in black ink that reads "John Milne". The signature is written in a cursive, flowing style with a large loop at the end of the name.

John Milne MP
Member of Parliament for Horsham