



Planning Inspectorate

Examination of the Horsham District Local Plan 2023-2040

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5 May 2026

Dear Ms Howe

Horsham District Local Plan 2023-2040

Interim conclusions and action points

After the first week of hearings, held from 21 April to 24 April 2026, I am writing to set out my interim conclusions and further action points based on matters covered so far.

My comments on the key issues of the plan period, the housing requirement and housing supply are set out below. These were discussed in the hearings under Matters 1 and 2. Further work or modifications arising from the hearing sessions on Matters 3 and 4 are set out in the Appendix to this letter. All these matters were agreed with the Council during the hearings, which were live streamed. The further work discussed below is necessary to ensure the plan is made sound and can be adopted.

The plan period

The plan's end date of 2040 means that the plan period would expire less than 15 years from the plan's adoption. National policy is that there should be at least 15 years between the adoption of the plan and the end of the plan period. However, a pragmatic approach is needed here in view of the delay to the examination up to this point. The Council have a significant amount of work to do to make the plan sound and capable of adoption. Having to produce further evidence in connection with an extension to the plan period would create an additional burden. In any case, the new local plan regulations require the Council to start work very soon on a new plan, so a strict minimum of 15 years is less critical in these circumstances. It is also helpful that retaining 2040 as the end date will ensure that it coincides with that of the adopted local plan for Crawley and the emerging local plan for Mid Sussex. The plan period will therefore remain 2023 to 2040.

Local housing need and the housing requirement

The plan is being examined under the September 2023 National Planning Policy Framework by virtue of the transitional arrangements set out in the December 2023 and December 2024 National Planning Policy Frameworks. The figure for local housing need will be derived from

the standard method for calculating local housing need (LHN) that was in existence at the time of the September 2023 version of the National Planning Policy Framework (NPPF). Since the LHN calculation is almost 2 years old, it will be updated to take into account the most recent inputs, but it will continue to be based on the standard method calculation that was in place in September 2023. Since the plan's contents are based on the local housing need figure that is derived from that method of calculation it would be unreasonable and inconsistent with the transitional arrangements to seek to apply the later standard method calculation that was introduced in December 2024.

The District's local housing need figure derived from the relevant standard method formula was 911 dwellings per annum (dpa). The downward adjustment of 21 dpa to reflect the anticipated number of homes within the South Downs National Park is supported by reasonable evidence. This gives a local housing need figure for Horsham District's area outside the National Park of 890 dpa for the year 2023/24. The equivalent adjusted figure for 2024/25 is 896 dpa, and for 2025/26, 819 dpa.

Local housing need is represented by these figures, and given that almost two years have passed since the figure of 890 dpa was calculated, it is appropriate to base local housing need from 2025/26 until the end of the plan period on the most recent figure of 819 dpa, with LHN in years one and two of the plan period being 890 dpa and 819 dpa respectively. This gives a total of 14,071 homes over the plan period.

It is agreed that the plan will seek to accommodate half of Crawley's unmet housing need to 2040, as identified in the Crawley Local Plan. The other half will be accommodated by Mid Sussex. Half of Crawley's unmet need amounts to some 3,757 dwellings. The total figure for Horsham, adding the two together, is 17,828 dwellings.

On top of the figure of 17,828 dwellings, the plan's housing requirement will accommodate a realistic and reasonable evidence-based allowance for the south coast's unmet housing need. The Council are liaising with Mid Sussex who are developing a methodology for assessing what an appropriate allowance might be. This work will enable a final figure for the housing requirement to be produced.

The allowances for unmet need will be added to the annualised housing requirement and will be spread evenly across the plan period.

However, a stepped annual housing requirement trajectory will be required, and this is discussed below.

Identifying additional housing sites

The submitted plan falls short of meeting local housing need and does not contain any allowance for unmet need from neighbouring authorities.

The Council will therefore need to identify further housing sites for inclusion in the plan in the interests of soundness. A number of sites had previously been identified but were not carried forward into the plan owing to the water neutrality restriction. The Council will critically reassess known sites using an appropriate methodology (likely based on the methodology recently developed by Mid Sussex) and will identify a range of sites of different sizes, some of which will be capable of delivering in the shorter term to help ramp up delivery, whilst others will deliver longer term. I am mindful of the importance the Council, Andrew Griffith MP and others have placed on the importance of delivering timely infrastructure to serve the new sites.

The sites that are identified should be capable of delivering sufficient homes to meet the finalised housing requirement described above, together with an additional amount of supply headroom which will act as a contingency should any allocated sites fail to deliver at the time or rate predicted. Depending on the size of the allowance for unmet need on the south coast, which is subject to further study, the overall level of housing supply that the Council will need to aim at should be no lower than the high growth scenario that the Council presented in its Topic Paper for Matter 2 (HDCJB05), and may need to be somewhat higher.

Housing delivery rates were low during the first years of the plan period owing to the restrictions imposed by the issue of water neutrality. The restriction has now been lifted but delivery is predicted to remain subdued until new permissions begin to be implemented. This will require a stepped housing trajectory with a substantial rise in the annual average requirement from year 8 of the plan. When the Council has gone through its site reassessment and its re-evaluation of the windfall allowance, and has produced a realistic annual housing supply trajectory, this should be fed back into the design of the stepped housing requirement trajectory.

I am wholly sympathetic to the challenges that the Council face on this subject. A pragmatic approach will be taken to the design of the stepped trajectory to ensure that there is a good prospect that a 5 year housing land supply can be maintained throughout the plan period.

Other matters

The other matters that require the Council's attention following the week of hearings are set out briefly in the Appendix to this letter. These were all agreed with the Council during the hearings.

Future steps

When the Council has gone through the process of site assessment and selection, and any attendant legal requirements, a list of additional sites and areas for growth will be incorporated in the schedule of main modifications. The modifications to the development management policies that I have already agreed with the Council will also be included in the schedule. The schedule of main modifications will be subject to public consultation.

I shall consider the results of that consultation and later this year I shall hold hearings into the spatial strategy, site selection, the strategic sites and certain of the site allocations – those that are already in the submitted plan and those that the Council are proposing to add to the plan, as discussed above. Other site allocations and matters will be dealt with in writing. Two weeks are likely to be needed for the hearings with perhaps one or two extra reserve days and I ask the Council please to liaise with the examination programme officer and with Mid Sussex District Council, whose examination is running in parallel, to identify suitable dates for these hearings.

I am very grateful for the hard work that the Council's team has put in to prepare for the examination and the hearing sessions, and I am also grateful for the assistance of the hearing participants and the quality of the submitted evidence. I fully understand the challenges that the Council face in taking this work forward and will do what I can to provide helpful input where it is needed.

I look forward to working with you through the next stages of the examination.

Jonathan Bore

Inspector

APPENDIX

Detailed action points

Matter 3	Ensure affordable housing requirement takes into account site specific constraints on sites, or infrastructure / access requirements, and potential impacts on viability
Matter 3	Need to consider the extent to which managed products are capable of delivering affordable housing
Matter 3	Review with wording of Policy 38c), which currently implies non-support for sites/proposals which don't meet the criterion.
Matter 3	Change title/associated wording of Policy 42 to reflect industry guidance ("Housing for Older People")
Matter 3	Policy 42 - criterion 1. Review wording to ensure policy does not rule out viable sites which do not meet all criteria - should it instead list as "material considerations".
Matter 3	Policy 42 - consider whether criteria 2 is necessary.
Matter 3	Policy 42 - test policy against different models, or liaise with industry / objectors to address concerns directly.
Matter 3	Remove Policy 40 criterion 4
Matter 3	Review Policy 40 to differentiate between specialist accommodation which already meets necessary standards for intended user and standard dwellings
Matter 3	Policy 40 - revisit guidance and emerging policy as well as evidence base to establish a need which the policy ask reflects - wheelchair accessible standards only applied to social housing
Matter 4	Liaise with Graylands site owners / reps to discuss possibility of allocating more of the site or providing sufficient flexibility for further growth - is it feasible for this plan and will it address issues raised?
Matter 4	Consider whether the link to settlement hierarchy does enough to address the need for sites to be in accessible locations (per NPPF para 83)
Matter 4	Review wording of Policies 29 and 30 to align more with NPPF 2023 and with development management policies in development. Aim for more positive approach, greater degree of flexibility and fewer impediments to addressing changes in the market
Matter 4	Notwithstanding different markets served by HDC and neighbouring authorities such as Crawley Borough Council,

	ensure policies reflect the range of uses likely to be needed in Horsham
Matter 4	Address concerns with sites where existing restrictions means likelihood of vacancies in the coming years, particularly in existing KEA allocations