

**Examination Statement
2026
Matter 1 – Housing Requirement**

Horsham Local Plan

Representations on behalf of Taylor Wimpey Strategic Land, a
division of Taylor Wimpey UK Ltd

ID 1199259

10 April 2026

Lucid
Planning

Contents

1. Introduction	1
2. Response to Matter 1 Housing Requirement	3

1. Introduction

- 1.1 This Statement has been prepared by Lucid Planning on behalf of our Client, Taylor Wimpey Strategic Land, a division of Taylor Wimpey UK Ltd (TW), who has an interest in the land east of London Road, Henfield (SHELAA Ref SA693). This Statement is prepared in response to the Inspectors' Matters, Issues and Questions.
- 1.2 Representations have been made on behalf of our Client throughout the production of the emerging Local Plan and these representations expand upon earlier representations. While efforts have been made not to duplicate the content of previous representations, this Statement draws on previous responses where necessary.
- 1.3 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 These representations respond to the Inspectors' 2026 MIQs but do not necessarily respond to all questions raised under this Matter but focuses on those questions of particular relevance to our Client's interests.
- 1.5 These representations have been considered in the context of the relevant NPPF that the District Plan is being examined under - NPPF September 2023 - and tests of 'soundness' as set out at paragraph 35 of that NPPF. This requires that a Local Plan be:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2. Response to Matter 1 – The Housing Requirement

- a. The identification of the appropriate basic local housing need figure for the purposes of the plan**
- b. The relationship of this figure to the base date of the plan**
- c. The amount of unmet housing need from nearby districts to be accommodated**
- d. Whether any other factor should influence the housing requirement**
- e. The appropriate housing requirement arising from a. to d**

Introduction

- 2.1 It is accepted that the Minister of State for Housing and Planning has removed the Duty to Cooperate for emerging plans coming forward under the current system. However, these representations should be read alongside TW's previous representations to the Horsham District Council (HDC) Local Plan Examination (ID 1199259).

A. Appropriate Basic Local Housing Need Figure

- 2.2 TW agrees with the approach HDC has taken to establish a housing need for the plan period as it has taken a consistent approach to that advocated at the Mid Sussex Local Plan Examination, and therefore is necessarily consistent.
- 2.3 It is noted, however, that HDC propose to reduce its annual requirement from 911 to 890 to reflect updated evidence (reported in HDC letter to the inspector of 11 February 2026) on housing need in the South Downs National Park Authority. For consistency, however, TW consider the housing need across the plan period should be 911 dwellings per annum as this is the LHNA at the point of submission, in accordance with the PPG.
- 2.4 The Local Plan was submitted for Examination in July 2024. The PPG states that the calculated housing need can generally be relied upon for a period of two years from the time of submission; which means the LHN should be recalculated in three months from these hearings (April 2026). This needs to be taken into account when considering the LHN.

B. Base Date and Plan Period

- 2.5 The submitted Horsham District Local Plan covers the period to 2040 and as such the plan looks ahead for 13 years from the point of adoption. Paragraph 22 of the September 2023 NPPF, however, requires strategic policies to look ahead over a **minimum** 15 year period **from adoption**. The plan period should therefore be extended by 2 years to 2041/42 as a minimum.
- 2.6 HDC has set out that the new planning regulations published in March 2026 require the Council to commence plan making under the new regulations with effect from June this year. The Council suggests this new plan will need to consider housing allocations in the longer term and therefore presents an opportunity to address longer term considerations and the most recent NPPF requirements including those relating to housing numbers in short order. Consequently, HDC do not consider any review of the base date is necessary.
- 2.7 This is, however, just exacerbating the issue of **existing** unmet housing need, and pushing it forward by several years. There is scope to increase the housing requirement for Horsham district now, and that opportunity should be taken in this local plan, particularly given the impact of water neutrality on housing supply in the area.
- 2.8 While national policy emphasises the importance of up-to-date Local Plans, the imperative for timely adoption does not displace the requirement for a plan to be positively prepared and justified.

Horsham District's Housing Requirement

- 2.9 To be positively prepared and justified, the Local Plan must fully meet Horsham district's own housing requirement of at least 17,309 new homes, not 14,071 as set out in the HDC Housing Topic Paper.

Year of Plan	SM Baseline	Minimum Total HDC Need
2023-2025	3 x 911	2,733
2026-2042	16 x 911	14,576
Plan Period Housing Need		17,309

C. Unmet Need from Neighbouring Authorities

- 2.10 Paragraph 11 of the Council’s Housing Topic Paper March 2026 states that Horsham would seek first to meet its own need in full, after which meeting wider housing need from the North West Sussex Housing Market Area (NWS-HMA) would be its priority. Coastal West Sussex HMA would be the third priority.
- 2.11 Table 5 then sets out the position of Crawley, Horsham and Mid Sussex (The NWS-HMA) discounting the ‘headroom’ of 1693 identified by Mid Sussex during its Examination; however, the figures are conflated.
- 2.12 A positively prepared plan should clearly state:
- Housing Requirement = Horsham LHN + Defined Allowance for Unmet Need
 - Supply Headroom = Additional contingency above that figure.
- 2.13 This is clarified in the Inspector’s Post Hearing Letter to Mid Sussex, where he defines ‘headroom’ as a theoretical excess of housing supply over housing requirement when setting out that Mid Sussex are going to give consideration for it.
- 2.14 The unmet need for Crawley is 7505. Mid Sussex agreed at its Examination to accommodate 50% of that need, leaving 3753 dwellings to be accommodated by HDC, as set out in paragraph 13 of the HDC Housing Topic Paper.

- 2.15 HMAs and FEMAs acknowledge the strong relationship that towns/districts have with one another. The south of Horsham district is well related to and has good connectivity with Coastal West Sussex and Brighton and East Sussex towns as demonstrated by the HMA and FEMA boundaries. Unmet need in these authority areas is substantial:
- 14,160 dwellings (885 homes per annum) in Worthing, as set out in the *2023 adopted* Worthing Local Plan and the 2024 Worthing/HDC Statement of Common Ground
 - The Brighton & Hove SHLAA Update of October 2024 clearly sets out that it has identified a land supply of 11,500 (670 dpa) up to 2041; however, the December 2024 LHN figure is 2498 dpa, leaving an unmet need of 1828 dpa or 27,420 over the plan period.
 - The exact figures of other authorities in the Coastal West Sussex HMA have not yet been specified, but the Coastal West Sussex authorities (which include Brighton & Hove and Worthing) submitted evidence to the original Mid Sussex Examination in 2024, stating an unmet need of 30,000 homes up to 2050, which given the figure above is clearly increasing.
- 2.16 The physical and planning designation restrictions, and the consequential inability of Coastal West Sussex (Adur, Worthing, Arun and Chichester) and Brighton and East Sussex authorities to deliver their own housing, and a growing unmet need, has been known for well over 10 years. The Coastal West Sussex & Greater Brighton Strategic Planning Board (which also includes Lewes) expanded in 2015/2016 to include Horsham and Mid Sussex, seeking assistance to primarily address housing delivery issues. Unmet housing need in this part of the country is not a new or temporary phenomenon.
- 2.17 These are not just numbers; these are families without homes. This equates to c100,000 people that will not be provided homes.
- 2.18 In addition, it should be noted that the figures above do not address the Government's proposed new standard methodology figures, which without exception, increase the required number of homes in each authority.

- 2.19 Horsham is a very large, and relatively unconstrained district in terms of planning constraints. TW is concerned that HDC has not looked to maximise the effectiveness of plan making, particularly when considering the substantial - and growing - unmet housing need of the Coastal West Sussex and Brighton and East Sussex authorities. The Worthing unmet need is known - 14,160 dwellings (885 homes per annum) – and must be addressed, at least in part.
- 2.20 Not that Worthing has any other neighbours that can assist in the Coastal West Sussex HMA, but on the basis that HDC has taken 50% of the specified Crawley unmet need, it is not unreasonable to suggest that Horsham could take 50% of the Worthing specified need, i.e. c7000 homes. If that is still considered too much, bearing in mind both Crawley and Worthing have set their unmet need in adopted Local Plans, HDC could take an equivalent amount to Crawley, c3750 dwellings.
- 2.21 This still leaves Worthing with a substantial known unmet need, and Brighton & Hove and the other HMA authorities without assistance, but that figure could make a significant contribution to unmet need in the Coastal West Sussex and Brighton and East Sussex HMAs, and in fact would be the first to address this overwhelming - and growing - issue.
- 2.22 Not addressing at least some of this unmet need will only exacerbate the housing crisis in this part of the south east, making it more difficult for local people to afford a home that meets their needs.
- 2.23 Planning to address at least some of this unmet need should not wait until HDC starts the next Local Plan, later this year. This will only exacerbate the issue of **existing** unmet housing need, and push it forward by several years. There is scope to increase the housing requirement for Horsham district now, and that opportunity should be taken in this local plan, particularly given the impact of water neutrality on housing supply in the area.

2.24 While national policy emphasises the importance of up-to-date Local Plans, the imperative for timely adoption does not displace the requirement for a plan to be positively prepared and justified.

2.25 The next plan can help address the remaining unmet need in the HMAs.

D. Other Factors Influence the Housing Requirement

National Context and Emerging Housing Pressures

2.26 It is acknowledged that the Plan is examined under the pre-2024 standard method. However, the revised 2024 methodology increases Local Housing Need figures across both relevant Housing Market Areas:

	Pre-December 2024 LHN	December 2024 LHN
Mid Sussex	1039	1356
Horsham	917	1357
Crawley	476	654
Brighton & Hove	2319	2498
Worthing	322	871

2.27 Although these figures do not apply formally to this Plan, they are highly material to the strategic context in which it will operate. They demonstrate that housing pressures across the sub-region are increasing rather than stabilising.

2.28 Deferring resolution of identified unmet need to a future plan cycle or to local government reorganisation risks prolonging an already significant housing shortfall across the sub-region.

E. The Appropriate Housing Requirement Arising from A. to D.

2.29 To conclude, TW consider the following is an appropriate housing requirement for HDC:

Plan Period	2023-2042
A./B. HDC LHN minimum, 15 post adoption Plan period	17,309
C. Crawley 50% Unmet Need Contribution	3,753
C. Worthing 26% unmet Need Contribution	3,750
E. Total Housing Requirement	24,812
Annualised Requirement	1,654 dpa

2.30 This figure does indicate what a substantial issue unmet housing need is in this area, but without these adjustments, the housing requirement does not make sufficient provision for new homes and cannot be said to be positively prepared, justified, effective or consistent with national policy.

2.31 It is worth noting that HDC's previous build rates, pre-water neutrality, consistently exceeded its specified housing requirement. For example against an average requirement of 800 dpa set out in the adopted Horsham District Planning Framework (November 2015) completions were as follows:

- 1,201 in 2015/16
- 1,125 in 2017/18
- 1,369 in 2018/19
- 955 in 2019/20

2.32 This demonstrates that given the size of the district, the variety of settlement typologies, the lack of planning constraints and demand for housing, that setting

a reasonable housing requirement that meets its own and neighbouring unmet need in both HMAs is feasible.

2.33 This requirement, when annualised, would eventually achieve 124% of the December 2024 housing requirement of 1,338, more than meeting the required 80%, meaning that paragraph 236 of the December 2024 NPPF is engaged, and not deferring housing delivery to meet existing need as well as future need to the next local plan cycle.

2.34 This would also significantly improve meeting the need for affordable housing and allow a lower percentage of affordable housing to be applied to non-strategic greenfield sites, in particular whilst still providing for more vulnerable Horsham residents.