

Horsham Local Plan EIP

Matter 1: The Housing Requirement

a. The identification of the appropriate basic local housing need figure for the purposes of the plan

1. HBF agree that the plan period should commence from 2023/24 as this reflects the year in which the assessment of need took place. We note that the Council are proposing to use the needs calculation for 2023/24 and 2024/25 on the Local Housing Needs Assessment for that period and then use the most recent assessment across the remaining plan period. This is based on the inspector's comments from the Mid Sussex Local Plan, and the Council are proposing the same approach for consistency. HBF agree with the assessment of needs undertaken but it is our contention that the housing need across the plan period should be 911 dwellings per annum – the LHNA at the point of submission.
2. HBF also note that the plan period ends in 2039/40 and as such the plan looks ahead for 13 years from the point of adoption rather than the 15 years required by paragraph 22 of the NPPF. The plan period should therefore be extended by 2 years to 2041/42.
3. With regard to housing needs in that part of the District covered by the South Downs National Park Authority (SDNPA) the Council have chosen to reduce their needs to reflect the approach taken in assessing needs in the National Park. This approach is still to be tested at examination so cannot be considered a definitive position. However, until a final decision is reached as to the soundness of the SDNPA assessment of housing need HBF considers it to be an appropriate way forward.

b. The relationship of this figure to the base date of the plan

4. As set out above HBF agree with the base date for the plan being 2023/24 but question whether the assessment of need should be amended as is being proposed by the Council. The expectation on submission is that the housing need can be relied upon for two years from submission and as such should be 911 dpa across the plan period. However, given the delay in the examination HBF recognises that the pragmatic position proposed by the inspector at Mid Sussex may be appropriate in these circumstances.

c. The amount of unmet housing need from nearby districts to be accommodated

5. As the Council acknowledge in their Matter 1 Topic Paper (HDCJB04) the unmet needs for Crawley are 7,505 homes over the plan period 2023 to 2040. As for other neighbouring areas there are unmet needs not only in Brighton and Hove but also Worthing where there is an identified shortfall of over 14,000 homes. It is also likely that both Adur and Arun will struggle to meet needs in full given their constraints however these are still to be clarified. However, it should be noted that Arun's adopted local plan is out of date and that over the next five years they have a shortfall against assessed housing needs 1,655 dwellings, which suggests they may struggle to deliver 1,476 homes per annum required by the latest standard method.

6. With regard to unmet needs in these coastal areas the Council suggest in paragraph 16 that the link between Horsham and other areas on the south coast is not as clear. However, it should be noted that there is evidence of relatively strong migration patterns between Horsham and the coastal areas to the south of the District. Data from the most recent migration figures published by ONS show that areas such as Brighton and Hove, Worthing and Arun are key destinations for people moving from Horsham. Horsham is also a key area for people moving from those areas. It may not be as strong as the link to Crawley or Mid Sussex, but they indicate that the needs of these areas could reasonably be met in Horsham.

Table 1: Top 10 LPAs - migration from Horsham 2024

LPA	People
Mid Sussex	568
Arun	537
Brighton and Hove	369
Crawley	362
Chichester	388
Worthing	341
Adur	173
Waverley	167
Reigate and Bansted	135
Mole Valley	134

Source: ONS Internal migration estimates (June 2024)

Table 2: Top 10 LPAs - migration to Horsham 2024

LPA	People
Crawley	880
Mid Sussex	568
Brighton and Hove	539
Reigate and Banstead	321
Worthing	316
Chichester	305
Mole Valley	281
Arun	265
Croydon	245
Adur	211

Source: ONS Internal migration estimates (June 2024)

7. In addition to those areas to the south of Horsham with unmet needs the Council do not appear to have taken into account the shortfalls arising in Mole Valley to the north of Horsham. The Mole Valley Local Plan was adopted in 2024 and over the plan period 2020 to 2039 identified a substantial shortfall of 2,359 homes. As with the authorities to the south of Horsham while the migratory links are not as strong as with Crawley and Mid Sussex, but they are not insignificant and indicate that providing homes in Horsham would be an appropriate strategy to meet some of the housing needs that cannot be met in Mole Valley itself.

d. Whether any other factor should influence the housing requirement

8. The key factor in determining the housing requirement in Horsham is the standard method and any unmet needs in neighbouring areas that should be planned for.

e. The appropriate housing requirement arising from a. to d.

9. The Council should be looking to plan for their own needs over the plan period 2023/24 to 2041/42. Added to this should be half of Crawley's unmet needs and at least some of the unmet needs arising in Brighton, Worthing and Mole Valley. Clearly it is not possible given the scale of the unmet needs for any one authority to meet the needs of these authorities in their entirety, but a reasonable contribution will need to be provided for.

Mark Behrendt

Regional Planning Manager – SE and

