

**Examination of the Horsham District Local Plan 2023-2040**

**Matter 1: Housing Requirement**

Bridgewater Farm, Billingshurst

Vistry

Version: 1

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## **Introduction**

This Hearing Statement has been prepared on behalf of our client Vistry in response to the examination of the Horsham Local Plan 2023-2040, specifically Matter 1, outlined in the draft agenda as relating to the Council's housing requirement.

Vistry previously made representations at Regulation 18 and 19 stages of the Local Plan process, as well as the original Hearings. Vistry have land interests within the Plan area at a site known as Bridgewater Farm, Billingshurst. This Statement should be read in conjunction with Vistry's representations.

Vistry can confirm that they would like to participate in the week 1 Hearing Sessions proposed.

### Vistry Group

Vistry is one of the UK's largest home builders, specialising in mixed-tenure housing and sustainable new communities delivered through a partnerships-led model. The Group has a strong track record of delivery, including a multitude of sites and projects varying in size and scale across the country, supported by new infrastructure, green space, and other facilities.

Early engagement and suitably designed schemes, which are responsive to the local context is at the core of what we do.

Sustainability is central to Vistry's approach, with investment in modern methods of construction, energy-efficient homes and landscape-led design to support long-term environment, social and economic outcomes.

### **a. The identification of the appropriate basic local housing need figure for the purposes of the Plan.**

Our Reg 19 representations confirm there is no justification or evidence to support the decision to plan for a lower number housing need, as is presented in the submission version of the Plan. This, Horsham described, was largely related to water neutrality. This constraint has now been removed by Natural England and so we expect a larger number of homes to now be provided for, together with a proportion of unmet need identified by adjoining LPAs.

Vistry agrees with the revised approach to calculating local housing need as set out in the Housing Topic Paper (March 2026). The standard method should be the starting point for calculating housing need, in line with the NPPF 2023 requirements. The Topic Paper confirms the approach has been updated to reflect the relevant affordability ratios for preceding years and using 2025/2026 as the basis going forward. A proportionately agreed discount has also been applied to account for need arising from Horsham, but located within the South Downs National Park (SDNP).

Paragraph 10 of the Housing Topic Paper provides confirmation that the Council acknowledges and recognises the need to address longer term considerations and the most recent NPPF requirements, including relating to housing number in short order following the Plan's adoption. Vistry strongly recommend and would support the inclusion of a review mechanism within the proposed policy wording to account and allow this to be implemented. This is a similar approach taken by Winchester City Council in their recently adopted (24<sup>th</sup> March 2026) Local Plan, at Policy SP2, with the following wording:

*“The Council will undertake a review of the Local Plan 2040, which will start no later than 6 months after the adoption of the plan. This review will primarily address any changes in the National Planning Policy Framework and the Standard Methodology.”*

Vistry recommend this is taken one step further in the case of Horsham DC and reference to the latest plan-making legislation be made to ensure an efficient and timely review takes place.

### **b. The relationship of this figure to the base date of the Plan**

Vistry acknowledge the approach taken to the base date by Horsham, noting they intend to apply the same methodology as implemented by Mid Sussex in their Local Plan Review. Whilst it is agreed, there should be consistency in calculating housing need, it is not uncommon for adjoining Local Authorities to have different plan periods but still being capable of addressing unmet need across the two areas. Indeed, it is noted that the proposed base date for Mid Sussex' plan is 2021 and therefore differs from Horsham in any case.

In addition, whilst reference is made to aligning the base date with Mid-Sussex, there is no comment referring to the alignment of base dates with Crawley.

Furthermore, the impact of Local Government Reorganisation could influence the connections between existing adjoining authorities, diluting this point. Until this has been confirmed and a Spatial Strategy prepared, Horsham should continue to focus on an appropriate base date for their Plan in

the first instance. This will ensure positive plan making, whilst, as has been mentioned above, still being capable of addressing unmet need across the wider area.

As a minimum and as mentioned in our response to a. above, a strong and effective review mechanism should be included within the policy wording to ensure the preparation of a new Plan addressing the changes in regulations and national policy is capable of being implemented as soon as possible.

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

Whilst it is acknowledged there is a directive to remove the Duty to Cooperate from legislation, there remains a clear policy requirement to achieve collaborative, cross-boundary working with the draft NPPF 2025, to ensure appropriate spatial planning. Vistry are therefore supportive of the proposed approach to include 3,757 homes worth of unmet need from Crawley across the Plan period.

Notwithstanding this, further consideration should be given to meeting more, particularly in Crawley and Mid-Sussex. Whilst this may elongate the Examination process, collaborative working either under the current legislative requirement or under the revised policy directive should be fully explored to ensure best use of land within the plan-making system and ensure the chronic need for housing is properly addressed.

**d. Whether any other factor should influence the housing requirement.**

Vistry consider there to be no other factors influencing the proposed housing requirement. The starting point is the standard methodology for calculating housing need, using 2025 as the base date.

Proposed allocations, windfalls, infill development and other sources of supply detailed within the emerging Local Plan should be updated to reflect delivery in the intervening period to ensure an appropriate number of additional allocations have been included within the housing review process undertaken by Horsham in March 2026.

All other influences such as environmental and other delays to delivery should be accounted for in appropriate capacity testing at this stage of the plan making process to ensure sufficient allocations have been proposed.

**e. The appropriate housing requirement arising from Points a. to d., above.**

On the basis of the above, Vistry are of the review the updated requirement is broadly appropriate, however, requires some additional modification to ensure an effective and efficient Plan. As such the inclusion of a review mechanism is strongly encouraged. This would ensure the following points are captured in a timely manner:

- Housing need is calculated in line with latest regulatory and policy directives.

- Appropriate Plan base dates are included.
- The ability to address unmet need is maximised.