



Examination of Horsham Local Plan Update 2023-2040

Written Statement – Matter 1

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1 Introduction

1.1 Introduction

- 1.1.1 Stantec is instructed by Miller Homes Limited (“Miller Homes”) to submit this Written Statement in response to Matter 1 (Housing Requirement) arising from the Inspector’s Matters and Questions.
- 1.1.2 Miller Homes has a land interest at Lyons Road, Horsham (SHELAA Reference SA492). These representations are made in the context of that interest; however, in accordance with the Inspector’s Guidance Note, they do not seek to promote any specific site for allocation. Instead, they focus on the soundness of the Plan in relation to the housing requirement.
- 1.1.3 This statement should be read alongside the representations submitted by Miller Homes in respect of Matters 2 and 3, which address housing supply, delivery, and the approach to meeting housing needs.
- 1.1.4 This Written Statement addresses the questions raised by the Inspector in relation to:
- 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 the above
- 1.1.5 In responding to these matters, the focus of this statement is on whether the proposed housing requirement is justified, effective, and consistent with national policy.

1.2 Summary of Position

- 1.2.1 It is respectfully submitted that the Plan, as drafted, is unsound in respect of its housing requirement. In particular, the proposed requirement:
- Does not maximise housing delivery “as far as possible”
 - Appears to be derived from a constraint-led approach rather than an objective assessment of need
 - Relies on uncertain delivery assumptions
 - Fails to provide sufficient flexibility or contingency



2 Matter 1

2.1.1 The following sections respond to the Inspector's questions in turn, having regard to the requirements of the National Planning Policy Framework.

2.2 a) The Identification of the Appropriate Basic Local Housing Need Figure for the purposes of the plan

2.2.1 The Plan's starting point for housing need is derived from the standard method. While this provides an appropriate baseline, the issue is not the calculation itself, but how it has been applied.

2.2.2 The evidence suggests that the resulting housing requirement has been adjusted downward in practice through the application of constraints and delivery assumptions.

2.2.3 The Council's own evidence indicates that the proposed requirement is influenced by delivery constraints rather than representing a clear uplift from the standard method as a minimum baseline. This risks undermining the role of the standard method as a minimum starting point.

2.2.4 National policy is clear that the standard method should be used as a baseline, with plans seeking to significantly boost the supply of housing. In this case, the approach taken does not demonstrate that housing delivery has been maximised.

2.2.5 For these reasons, the approach is not positively prepared, as it does not seek to maximise housing delivery as required by national policy.

2.3 b) The Relationship of this Figure to the Base Date of the Plan

2.3.1 There is limited evidence to demonstrate that the housing requirement has been appropriately aligned with the base date of the plan and the latest available evidence.

2.3.2 In particular, it is not clear that the Plan fully reflects changes in housing need over time, updated delivery constraints and current market conditions.

2.3.3 A sound approach should ensure that the housing requirement is based on up-to-date and relevant evidence. Without this, there is a risk that the requirement does not accurately reflect current needs or realistic delivery conditions.

2.3.4 As such, the housing requirement is not justified, as it is not based on up-to-date and proportionate evidence.

2.4 c) The Amount of Unmet Housing Need from Nearby Districts to be Accommodated

2.4.1 The Plan proposes to accommodate a proportion of unmet need arising from Crawley. However, only a partial contribution is proposed, and there is limited justification for this approach.



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- 2.4.2 The NPPF requires that unmet housing needs should be addressed in full as far as possible. In this case, there is no clear explanation as to why only part of the unmet need is being accommodated and there is no robust evidence demonstrating that higher levels of provision are not achievable. The evidence does not clearly demonstrate that higher levels of provision have been tested or that all reasonable options for accommodating unmet need have been explored.
- 2.4.3 Furthermore, unmet needs from other authorities within the wider Housing Market Area are not addressed. This suggests that the Plan has not maximised its contribution to meeting identified housing needs.
- 2.4.4 For these reasons, the Plan is not positively prepared and is not consistent with national policy, which requires unmet needs to be addressed in full as far as possible.

2.5 d) Whether Any Other Factor Should Influence the Housing Requirement

- 2.5.1 The Council places significant weight on constraints, including water neutrality, infrastructure limitations and site delivery assumptions. This is reflected in the proposed housing requirement and associated trajectory, which indicate that delivery is constrained by these factors and does not fully align with the level of identified need.
- 2.5.2 In particular, the evidence base acknowledges limitations arising from environmental constraints and the availability and deliverability of sites. The trajectory demonstrates reliance on a relatively limited pipeline of sites and identifies challenges in maintaining delivery across the plan period.
- 2.5.3 While these are relevant considerations, there is a concern that they have been used to limit housing provision, rather than to inform how delivery could be achieved. The approach appears to be constraint-led, rather than seeking solutions to overcome those constraints.
- 2.5.4 In addition, the Plan does not provide sufficient flexibility to respond to changing circumstances. Given the acknowledged uncertainties in delivery, greater flexibility is required to ensure that housing needs can be met over the plan period. This should include a broader range of site types, sites capable of early delivery and sites able to adapt to different forms of residential use.
- 2.5.5 As such, the approach is not justified and not positively prepared, as it does not demonstrate that all reasonable options to maximise delivery have been explored.

2.6 e) The Appropriate Housing Requirement Arising from a–d

- 2.6.1 Drawing the above points together, the proposed housing requirement is not justified or effective.
- 2.6.2 It is based on:
- A constrained interpretation of housing need
 - A limited approach to unmet need
 - Optimistic assumptions regarding delivery
 - Insufficient flexibility and contingency



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- 2.6.3 This is reflected in the Council's trajectory, which shows challenges in maintaining delivery and reliance on a limited number of sites.
- 2.6.4 As a result, it does not represent a positively prepared strategy, is not justified by proportionate evidence, is not effective in ensuring delivery, and is not consistent with national policy.



3 Conclusion and Recommended Modifications

3.1 Conclusion

- 3.1.1 The Council’s proposed housing requirement is not sufficiently robust or flexible to ensure delivery across the plan period.
- 3.1.2 The reliance on constraints, combined with a limited approach to unmet need and a lack of flexibility, results in a housing requirement that does not maximise delivery or provide confidence in its effectiveness.
- 3.1.3 The Plan should therefore be revised to ensure that it is positively prepared, justified, effective, and consistent with national policy

3.2 Recommended Modifications

- 3.2.1 To ensure soundness, the Council should:
- Reassess the housing requirement to ensure it maximises delivery in accordance with national policy
 - Reconsider the level of unmet need to be accommodated, ensuring that needs are met in full as far as possible
 - Adopt a more flexible approach to housing land supply, including a broader range of deliverable sites
- 3.2.2 This should include sites capable of contributing to general housing provision, particularly where they are available, deliverable, and able to respond to changing circumstances over the plan period.

