



Hearing Statement
Matter 1: The Housing Requirement

Horsham Local Plan - Examination in Public

On behalf of Reside Holdings Ltd (Response ID 1194238)

1. Introduction

- 1.1 This Hearing Statement is prepared on behalf of Reside Holdings in relation to the response to 'Matter 1: the housing requirement' and the issues identified in the draft Hearing Agenda, namely:
 - 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.
- 1.2 It is noted that the emerging Horsham Local Plan was submitted in July 2024, therefore by virtue of paragraphs 234 and 235 of the NPPF 2024 and paragraph 230 of the NPPF Dec 2023, the Plan will be examined under the policies contained within the NPPF September 2023.
- 1.3 The Local Plan was submitted under the previous constraints imposed by the requirements for water neutrality, and as submitted, the Local Plan does not make full provision to meet the housing needs of Horsham District. It also made no contribution towards the unmet needs of adjoining authorities.
- 1.4 In October 2025, Natural England (NE) issued a Withdrawal Statement confirming that its previous Water Neutrality Position Statement of September 2021, was withdrawn. The withdrawal of the Water Neutrality restrictions is a significant change in which to consider the housing requirement of the emerging Local Plan and the Council acknowledge (HDCJB01 and HDCJB04: Topic Paper 1: The Housing Requirement) that this means the Council must plan for the full housing needs of Horsham District. Additionally, the Council must give consideration to the unmet housing needs of adjoining housing market areas (HMAs), such as Crawley.
- 1.5 This hearing statement responds to the submitted plan, but also the documentation published since submission, including Topic Papers published in March 2026.

2. Matter 1: the housing requirement

- a. The identification of the appropriate basic local housing need figure for the purposes of the plan; and
- b. The relationship of this figure to the base date of the plan;

- 2.1 The Local Plan was submitted under the previous constraints imposed by the requirements for water neutrality, and as submitted, the Local Plan only provided for 13,212 homes over the plan period and does not make full provision to meet the housing needs of Horsham District. The submitted Local Plan (para 10.4) acknowledged that the calculation of housing need at the point of submission (July 2024) was 911 dwellings per annum (dpa) or 15,487 dwellings across the Plan period, this is acknowledged in Topic Paper 1: the housing requirement.
- 2.2 The submitted Plan also makes no contribution towards the unmet needs of adjoining authorities, nor does it include any headroom for resilience.
- 2.3 Our submissions are made on the basis that the approach as set out in the submitted Local plan is not sound, however, that we recognise that Council concede through their more recent evidence (Topic Paper 1: the housing requirement) that it is not sound and that main modifications are required to increase the housing requirement to meet Horsham District's housing needs in full and half of the unmet needs of Crawley.
- 2.4 We question however, the Council's approach to the housing requirement set out in post-submission documents, which seeks to amend the baseline calculation of local housing need and which is set out in Tables 3 and 4 of the Housing Requirement Topic Paper, summarised below:

Year	Standard Method figure
2023	911dpa
2024	917dpa
2025+	838dpa
Total plan period housing need	14,071

- 2.5 To this end, the Council set out in Topic Paper 1: the Housing Requirement, that the housing need for the plan period is now 14,071 dwellings.

- 2.6 The Council identify that the PPG1 allows local authorities to rely upon the calculation of housing need for a period of 2 years post submission of the plan. The intention of the guidance must be to ensure that the examination process can take place without further debate over the housing requirement if delays occur and further data is released. Instead, as the housing requirement has decreased using the September 2023 NPPF calculation, the Council have adopted the revised figures. This is despite the new calculation of Standard Method, significantly increasing the Council's calculation of housing need (1,338dpa). This approach is not positively prepared and does not reflect the Council's current housing requirement under the Standard Method; this cannot be sound. Whilst the plan is being assessed against the policies contained within the NPPF 2023, one must remember that the calculation relates to people in need of housing and as such, the Council's current position is not positively prepared or effective.
- 2.7 Additionally, we do not support the Council's position in relation to the approach taken to the South Downs National Park (SDNP). The Council state that the SDNP (Applying the Standard Method to the South Downs National Park Area – October 2025) have calculated that 2.3% of homes in Horsham District sit within the SDNP boundary, apportioning this to the standard method calculation for Horsham means that 21dpa can be removed from the calculation of housing need for Horsham District, resulting in a figure of 890dpa. This is not the approach the Council adopted at submission of the Plan.
- 2.8 The PPG2 deals with where strategic policy making authority boundaries do not align with local authority boundaries, such as for National Parks, an alternative approach may be used, but it is not mandated. Indeed it states that where "only a minimal proportion of the existing housing stock of a local authority falls within the National park or Broads Authority area it may be appropriate to continue to use the local housing need figure derived by the standard method for the local authority area".
- 2.9 We would respectfully suggest that the Council are choosing the elements of policy which reduce the calculation of housing need by; recalculating the amount of housing need post submission of the plan, despite the most recent Standard Method calculation suggesting significantly higher housing need, and, at the same time including an apportionment for the SDNP, both of which are approaches that the Council did not take at submission of the plan.
- 2.10 The Council's case (Topic Paper 1) is that the calculation of housing need is 14,071 over the Plan period. However, if one adopts the Council's approach taken on submission of the Plan

¹ PPG ID 2a-008-2024-1212

² Paragraph 014 Ref ID 2a-014-20241212

and assumes the Standard Method baseline of 911dpa across the whole plan period and does not discount for the SDNP area, the total housing requirement for Horsham District is 15,487 dwellings. The alternative scenarios (as partly set out at Table 4 of the Housing Requirement Topic Paper) are set out below:

Year of Plan	SM baseline (HDC assumed figure)	2.3% for SDNPA	HDC need (HDC assumed figure – 2.3% for SDNPA)	S&P position
2023 (1 yr)	911	21	890	911
2024 (1 yr)	917	21	896	911
2025 + (15 yrs)	838	19	819	911
Plan period housing need	14,398	327	14,071	15,487

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

- 2.11 The submitted Local Plan does not account for the unmet housing needs of adjoining authorities. The NPPF requires that unmet housing needs are accommodated where practical do so, this is a soundness requirement (paragraph 35, NPPF Sept 2023), it is also a requirement of the presumption in favour of sustainable development which requires that Local Plans meet the development needs of their area and provide for objectively assessed needs for housing... as well as any needs that cannot be met within neighbouring areas (paragraph 11).
- 2.12 The submitted plan makes no provision for the unmet housing needs of neighbouring authorities, however, we appreciate that the Council felt the constraint of Water Neutrality meant that it was unable to do so. However, NE have withdrawn their Position Statement and we welcome the Council's updated approach to the unmet needs of Crawley Borough Council, as set out in Topic Paper 1: the Housing Requirement.
- 2.13 The total unmet need arising from Crawley, as set out in their adopted plan is 7,505 dwellings. Crawley, Horsham and Mid Sussex have long agreed that they share a strong functional Housing Market Area (HMA), accordingly, historically Mid Sussex and Horsham have taken a shared responsibility for meeting the unmet needs of Crawley, each accommodating approximately half of the unmet need in their respective adopted Local Plans. Furthermore, this is the approach currently being taken through the ongoing Mid Sussex Local Plan EiP.

- 2.14 As such, the starting point should be that Horsham accommodates half of Crawley's unmet need, resulting in an additional requirement of 3,753 dwellings across the plan period, which is accepted by the Council in their recent evidence (Topic Paper 1: the Housing Requirement – paragraph 13). We wholly support the Council's revised position.
- 2.15 It should be noted however, that this position assumes that the emerging Mid Sussex Local Plan, through its EiP, will also accommodate 50% of Crawley's unmet needs. Should Mid Sussex District Council take an alternative approach, lower than 50% of Crawley's unmet needs, Horsham District will need to consider the ability of the Local Plan to accommodate a greater amount of Crawley's unmet housing needs.
- 2.16 We further submit that the Council should be accommodating some of the unmet housing needs arising from the coastal authorities, including Brighton and Hove and Worthing, whose needs are significant and continue to go unmet. This is also the approach being taken in relation to the Mid Sussex Local Plan EiP, where it has been recognised that the Council should also consider the unmet needs arising from the south coast.
- 2.17 At paragraph 11 of the Council's Topic Paper 1, they acknowledge that the Coastal West Sussex HMA is recognised as having unmet housing needs, but that this would be a third priority, a position that Brighton and Hove dispute (Brighton and Hove Statement of Common Ground – DC07) . The Council suggest (paragraph 16 of Topic Paper 1) that the relationship with the Coastal West Sussex and Brighton and East Sussex HMAs is not as clear, however, at Figure 1, there is clear overlap between these HMAs. We would somewhat agree that the relationship to the northern West Sussex HMA is stronger, however, the Council must still give consideration to the ability of the Council to contribute towards these unmet needs, which will otherwise go unmet, there is simply nowhere else that can accommodate these needs.
- 2.18 Worthing has significant unmet needs arising from its plan. The adopted Local Plan 2023 identifies Worthing's housing need at 885dpa but the Plan is only able to deliver 230dpa, a shortfall of 10,488 homes over the plan period. Additionally, Brighton and Hove have a long-standing inability to meet their own housing needs. Whilst it is appreciated that the need for Brighton and Hove is currently unknown, it is very clear that there is significant unmet need arising from the coastal authorities, with no way of this being met if it is not accommodated by adjoining authorities such as Horsham .
- 2.19 We submit that the emerging Local Plan should seek to meet 50% of the unmet needs of Crawley, and a proportion of the unmet needs of the coastal authorities.

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

Paragraph 236 and the '80% threshold'

- 2.20 The Council suggest that consideration should be given to the requirement of the Council to commence a new Local Plan under the new regulations in Summer 2026, this reflects the housing requirement set out in the submitted Local Plan, which is under 80% of the new Standard Method.
- 2.21 At present, the Council proposed a housing requirement of 78% of the new SM requirement of 1,338dpa (paragraph 18 of the Housing Requirement Topic Paper), this would engage paragraph 236 of the NPPF Dec 2024, which would require a new plan immediately on adoption of the emerging Local Plan. This would render the Plan ineffective from the outset, when the Council could go further towards meeting housing needs now, including unmet needs in full, such that the Council would not have to commence an immediate review.
- 2.22 Instead, the Council state that an immediate review is required and therefore it would be pragmatic to consider the extent to which the Council can accommodate Crawley and other unmet housing needs now or whether these should be considered through a Local Plan review. This simply postpones the consideration of unmet housing needs to a future plan, the details and timing of which are unknown and uncertain, particularly in light of Local Government Reorganisation. We therefore submit that if the Council revised the approach to the housing requirement, as set out above, it would be in excess of the 80% threshold and therefore an immediate review would not be required.

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

- 2.23 We set out below, our position in relation to the housing requirement set against the council's own position, set out in Table 6 of Topic Paper 1.
- 2.24 This excludes a contribution towards the unmet needs of the coastal authorities; it is acknowledged that the extent of unmet needs arising from the coastal authorities is so large, which is unlikely to be met by Horsham alone, however, we submit that in addition to the requirement set out above, a contribution should be made to the unmet needs of coastal authorities.

Plan Period	2023-2040 updated (HDC position)	2023-2040 updated (S&P position)
HDC Housing Need (Annual)	1 year at 890 ³ 1 year at 896 15 years at 819	911
HDC Housing Need – Plan period	14,071	15,487
Crawley Unmet Need Contribution – Plan Period	3,757	3,753 ⁴
Total Housing requirement (before including the unmet needs of coastal authorities)	17,828	19,240

³ Assumes a discount of 2.3% for the SDNP.

⁴ Assumes 50% contribution (7,505 / 2)

3. Summary

- 3.1 We broadly welcome the Council's position as set out in Topic Paper 1: the housing requirement, insofar as it recognises that as water neutrality no longer constrains the delivery of new homes, the housing needs of Horsham District should be met in full.
- 3.2 We also welcome the Council's recognition that approximately 50% of Crawley's unmet housing needs should be met (approximately 3,753 dwellings).
- 3.3 However, we submit that the following changes are required in order for the plan to be made sound:
- The local housing need calculation should be 911dpa over the plan period.
 - The Council should accommodate at least half of Crawley's unmet needs (3,753 over the plan period), dependant on the ability of Mid Sussex to accommodate the remaining 50%.
 - A contribution should be made towards the unmet needs of the coastal housing market areas, namely Worthing and Brighton and Hove.
- 3.4 Therefore, to be consistent with national policy, effective over the plan period and positively prepared, **the Council must plan for at least 19,240 dwellings over the plan period in addition to a meaningful contribution towards the unmet housing needs of the coastal authorities.**