



Horsham
District
Council

Neighbourhood Planning Workshop

19 June 2025





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Welcome and Introductions

Barbara Childs
Director of Place



Welcome and Introductions

Today's objectives:

- **Understand where we are with the Local Plan**
- **Learn about the key challenges we now face in Planning**
- **Refresh on the requirements for successful neighbourhood planning**
- **Understand what neighbourhood plans will need to do in future**
- **Feed back your thoughts to help inform HDC advice and guidance**

Meeting guidelines

- 1. We will keep as close as possible to the agenda timings, and finish by 5pm.**
- 2. Speakers will run through their presentations with an opportunity for Q & As.**
- 3. If you have a question in a Q & A session, raise your hand. Please let everyone know which parish you are from!**
- 4. There will be a 45 minute breakout session towards the end of the afternoon. This will be the opportunity for more detailed feedback, questions and discussion.**
- 5. Slides and other materials, and responses to key questions raised, will be circulated after the event, together with contact details.**

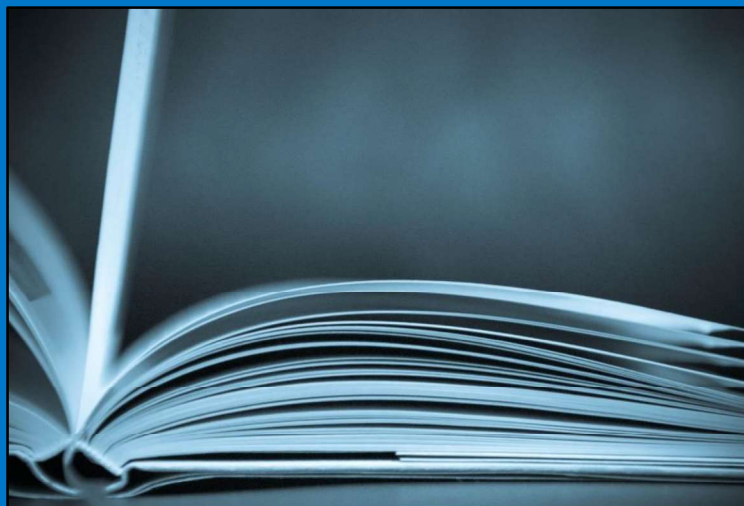


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‘Update on the Local Plan Status’

Catherine Howe

Head of Strategic Planning



Recap on the Local Plan

Publication (Regulation 19)

- Horsham District Local Plan 2023-40 (HDLP) published in January 2024
- Over 1,600 representations received – many parishes made comments. These were submitted to the Inspector with the plan and other documentation in July 2024.
- Content of plan - 777 per year (against a Government target of 911 per year). Impact of water neutrality a key part of the Council's argument as to why lower target set.
- Confirmed a 'settlement hierarchy' with sites allocated to align with this hierarchy

Local Plan Examination

Early stages

- Inspector appointed by the Planning Inspectorate – Luke Fleming
- Hearings scheduled for December 2024 and January 2025

Week 1 of hearings

- Inspector seemed unhappy from outset that water neutrality given as reason for below-target housing delivery
- Strong challenge from developers who did not have sites allocated
- Inspector announced on Day 3 of hearings that he had ‘significant concerns’ over the Duty to Cooperate test, and soundness.
- He cancelled all further hearings and stated he would provide his detailed concerns ‘as soon as possible’

Inspector's interim findings

- Inspector wrote to the Council on 7 April (nearly 4 months after the hearings took place)
- He has recommended that the Council withdraws the Local Plan
- He considers that the Council has failed the legal Duty to Cooperate
- The reasons?
 - the Council did not reconsider whether to allocate an additional strategic site (namely Buck Barn) which claimed to deliver water neutrality, and would increase delivery of housing
 - did not specifically record discussion of evidence relating to this with other authorities and bodies
- The Council strongly disagrees with the Inspector whose reasoning appears ill-informed. It responded in strong terms to the Inspector.
- The Council is considering its next steps

Summary of current position and next steps

- The 'new' HDLP has very limited weight. If withdrawn it would have no weight.
- The currently adopted HDPF will remain the development plan, as well as Made neighbourhood plans – used for decision making
- No 5-year land supply
- The Council is updating the 'Facilitating Appropriate Development' advice note to assist the Council, developers and communities given the delay in an up to date local plan being in place.
- However, the Council and communities will have far less say over how much housing comes forward, and where

And next steps?

- Local Plan review – our LDS indicates this will take place in the Autumn.
- Early days – awaiting Government regs (Autumn?) Watch this space...

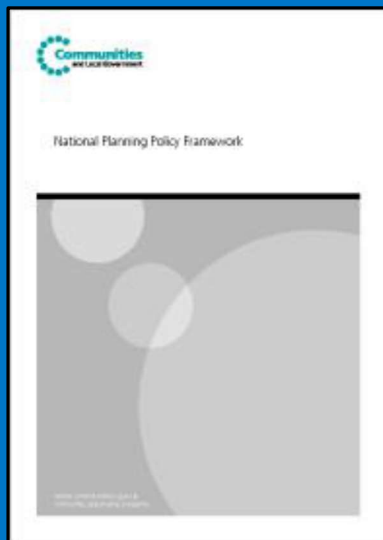


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‘Working under an evolving Planning System’

Matt Bates

Policy Team Leader



National Planning Policy Framework

- NPPF revised in December 2024 following public consultation
- Changes intended to quickly increase housing supply
- Supports Govt target of 1.5 million homes 2024-2029

Key change 1: Increased housing targets

- New 'Standard Housing Method' designed to up overall numbers
 - % increase on housing stock replaces household projections
 - South of England sees greatest increases
 - Horsham District – up from **917** dwellings p.a. to **1,338** p.a. (46% increase)

Key change 2: Local Plans

- Emerging local plans with housing target <80% of Standard Method to be immediately reviewed post-adoption, in order to meet the higher housing numbers

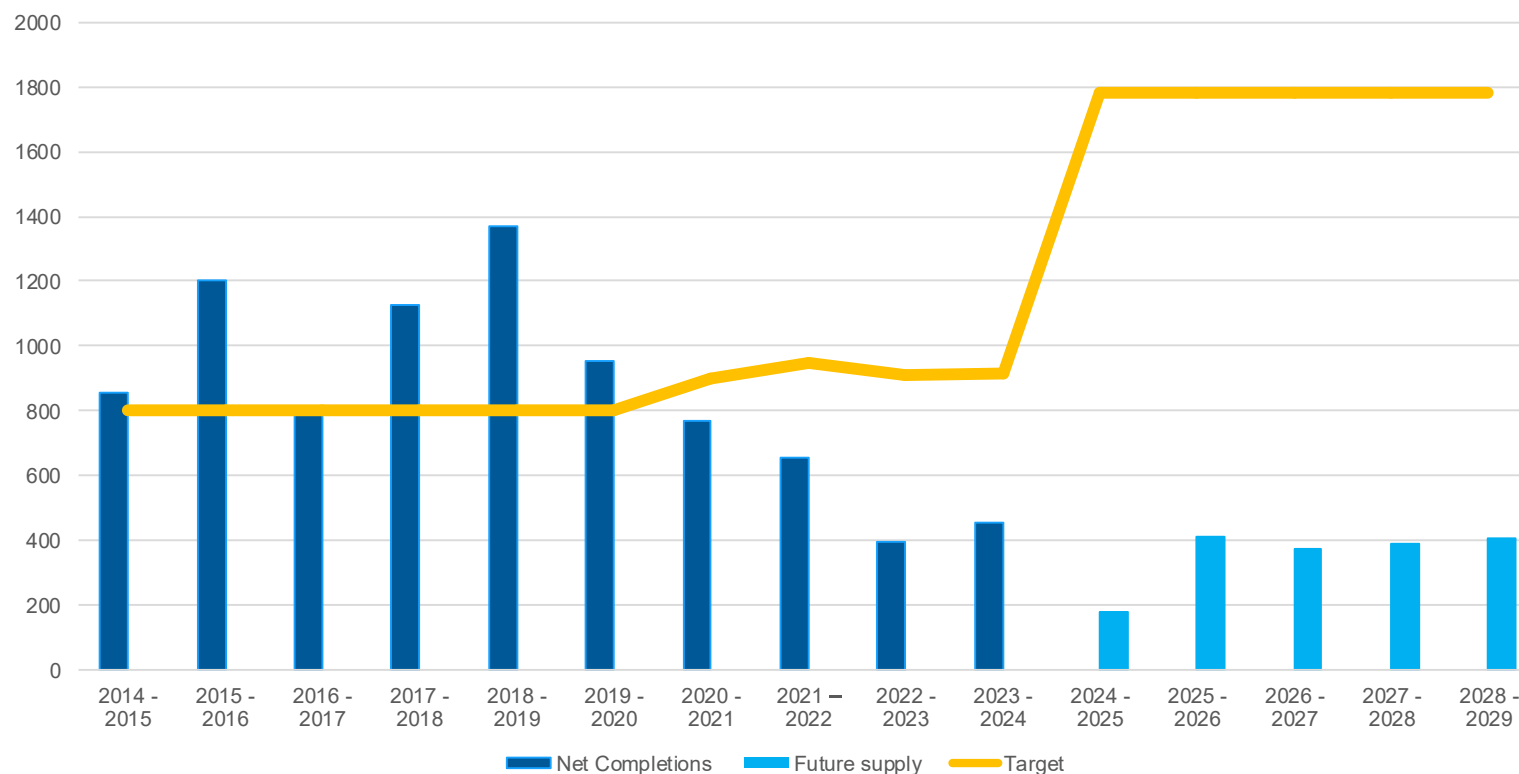
National Planning Policy Framework

What this means for Horsham District

- Our Local Plan is now 10 years old... so in NPPF terms, the housing requirement policies are 'out-of-date'.
- The Government target of 1,338 dwellings p.a. therefore applies.
- We cannot demonstrate a 5 year housing supply and are below 75% in the housing delivery test
- This means that:
 - We are expected to build to the Govt target (1,338) plus an additional 20% 'buffer' (268) – that's 1,607 dwellings p.a. in total
 - The 'presumption in favour of sustainable development' applies (also called the 'tilted balance')
 - As long as we don't meet this target, the Council is expected to approve all speculative development that complies with the NPPF
(and if we don't grant permission, it's quite likely that we'd lose the subsequent appeal)

National Planning Policy Framework

Horsham District Housing Targets vs Delivery Since 2014/2015



Figures taken from the most recently published AMR, updated to reflect the most recent standard methodology figure.

Target from 2024 onwards is the standard method figure + 20% buffer with an adjustment for past underdelivery

Further changes to the planning system

Future local plans

- New regulations for local plan-making promised in Autumn 2025
- Expected to be produced within 30 months, start to finish
- Will be more focused on strategic issues / site allocations (see below...)
- Will be **expected to meet the full 'standard method' housing number**
- As for neighbourhood plans, NPPF states:

“Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”

National development management policies

- Many non-strategic policies no longer in local plans, but published nationally
- Consultation due this year, no details as yet...

Water neutrality

Recap

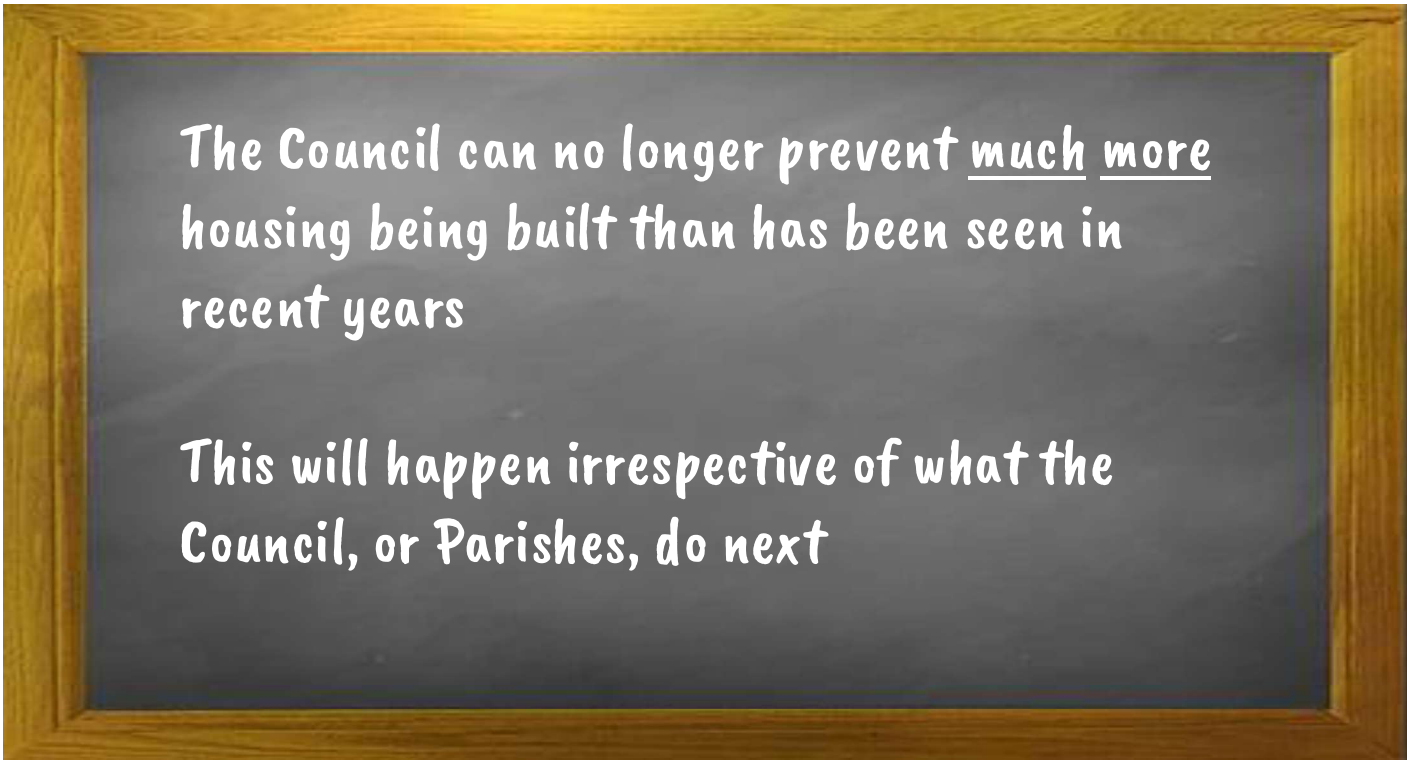
- Natural England Position Statement (Sep 2021) – immediate requirement for water neutrality.
- Big drop in planning applications from that point (and many more refused on water neutrality grounds).
- All of this has, until now, ‘protected’ the District from significant levels of speculative development.

Changes coming

- Southern Water has published its draft new ‘Water Resources Management Plan’ (WRMP).
<https://www.southernwater.co.uk/about-us/our-plans/water-resources-management-plan/>
- This is showing a lot more water is being saved than previously forecast. The savings look to be much greater than future increases in demand from new development.
- Whilst the Position Statement remains for now whilst the WRMP is finalised, we expect it to be withdrawn much sooner than was expected in 2021.

National Planning Policy Framework

In short:



The Council can no longer prevent much more housing being built than has been seen in recent years

This will happen irrespective of what the Council, or Parishes, do next

Devolution and Local Government Reorganisation

Devolution in Sussex

By 2027, it is likely that West Sussex, East Sussex and Brighton will merge together to become a Combined Mayoral Authority:

- A directly elected Mayor, and an elected Assembly, will have strategic planning powers
- Will develop a Spatial Development Strategy – likely to apportion development to lower tier Local Planning Authorities and identify sites for strategic development
- Will also be responsible for transport and economic development across the whole of Sussex

Local Government Reorganisation

By 2028, we expect that district and borough councils will have been replaced by larger unitary authorities (500,000+ populations).

None of this should change the status or remit of neighbourhood plans, which will still be able to set non-strategic policies and site allocations.

(Eventually they will need to conform with new Unitary Local Plans – but this is some way off)



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Andrew Ashcroft Neighbourhood Plan Examiner



Overarching points

- The NP agenda is now well-embedded.
- NPs are a key element of the development plan.
- They need to be relevant and up-to-date.
- The review process is also now well-embedded.
- The basic conditions remain largely unaffected.
- The recent Spending Review announcement will affect funding.
- NPs can be a key element of housing delivery.



NP Reviews – Important elements

- There is no need to review a NP
- However, effectiveness relates to up-to-date.
- PPG on the relationship between an emerging LP and NPs but..
- The timing of a NP review is a matter of local choice.
- The nature of a review affects the need for an examination and a referendum. Or you can opt to replace the Plan.
- Section 38 (5) remains as a timing trump card.



NP Review- Format

- No prescribed format.
- As such, many different presentations come forward.
- Key principle - the review of the plan will replace the made Plan.
- There is an overlap with Modifications Statement.
- Options:
- New Plan + Modification Statement; or
- New Plan + Made Plan with tracked changes; or
- Made Plan with tracked changes.

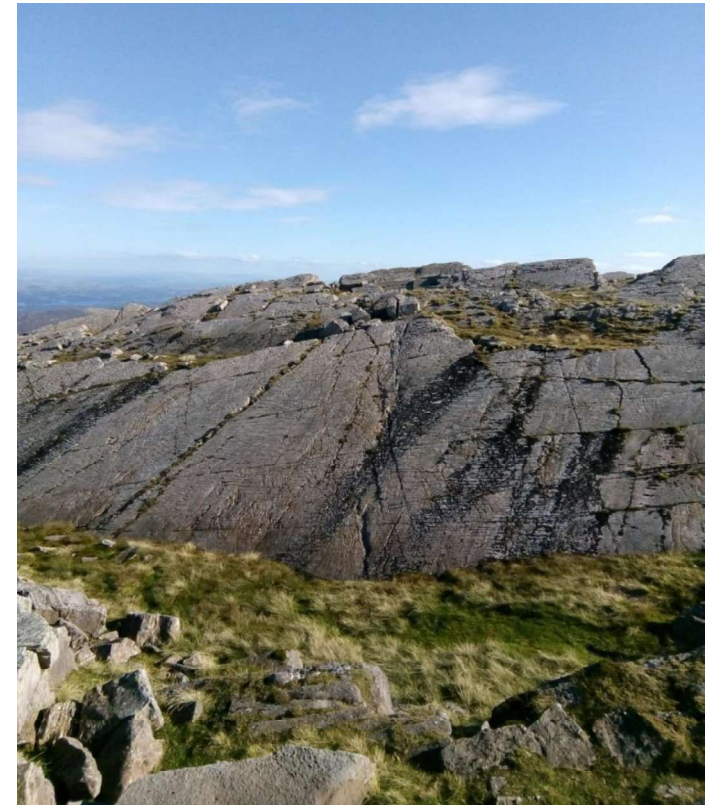
The Basic Conditions

- Remain as the key element of the examination.
- Have regard to national policy (NPPF December 2024).
- General conformity with strategic policies in the development plan.
- Comply with environmental legislation (SEA/HRA).
- Contribute to the local delivery of sustainable development – the economic/social/environmental dimensions.



Key points for examiners

- Evidence, evidence, and evidence.
- Proportionate levels of engagement with the community and the development industry.
- A positive rather than a negative approach
- Distinctive, parish-based policies
- Concise plans supported by technical appendices
- Clear maps
- No need to reinvent the wheel



NP Reviews -Common Issues and Challenges

- Generating interest locally for a review.
- Capacity and timescales (30 months target).
- The relationship between a LP review and NP reviews.
- Issues to be addressed in the Review.
- Site selection (and the Environmental Report)
- The extent of consultation required
- Overlap between LP and NP policies
- Policy wording

Top Tips

- It will be new plan – organise yourselves accordingly.
- Establish a diverse steering group but retain control.
- Engage the community and explain why the Plan is being reviewed.
- Keep in close contact with HDC throughout the process.
- Learn from best practice elsewhere.
- Remember that the goal is local involvement in the planning process.





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Questions

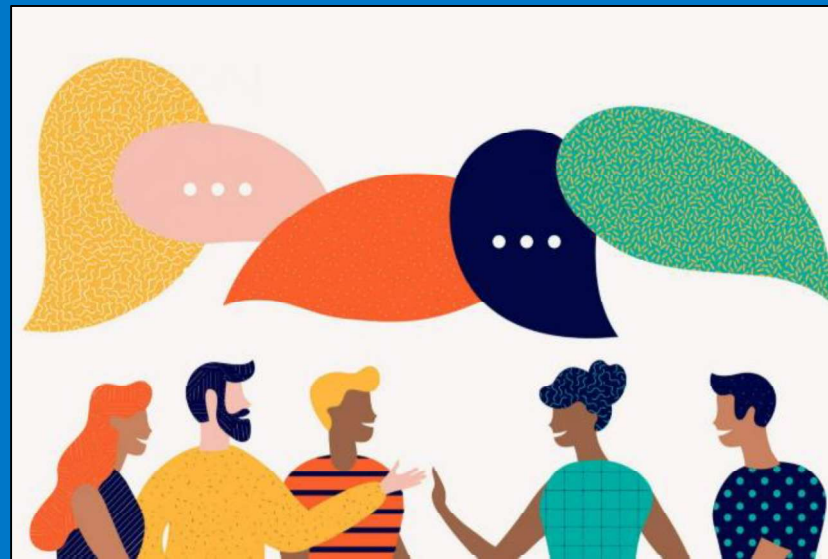




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‘Neighbourhood Planning: Next Steps’

Tal Kleiman – Norman Kwan



Neighbourhood Plan Review – meeting housing needs

- It is common for Neighbourhood Plans to choose to set out housing allocations to meet needs identified in a Local Plan.
- An up-to-date Local Plan would set out an overall housing target for the district and a strategy for how that would be delivered.
- It is possible to prepare a Neighbourhood Plan without an up-to-date Local Plan in place
- NPPF paragraph 70 – *“Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”*
- We want to set out a transparent methodology for providing a requirement figure should it be requested.



Standard Methodology - Indicative Housing Numbers

- Horsham District's standard method derived housing figure is 1,338 (as of May 2025)
- Calculation is in two steps:
 - Step 1: 0.8% of total existing housing stock – $66,392 \times 0.8\% = 531.136$
 - Step 2: $\text{Adjustment factor} = \left(\frac{\text{five year average affordability ratio} - 5}{5} \right) \times 0.95 + 1$
 $((12.998-5)/5) \times 0.95 + 1 = 2.51962$
 - Step 1 x Step 2 = 1,338
- Should a Parish Council/Neighbourhood Forum ask for an indicative figure, our starting point will be a figure based on the standard method distributing on a proportionate basis according to existing dwelling stock
- **CAUTION – indicative tables follow, but should not be seen as the Council's final position...**

Standard Methodology - Indicative Housing Numbers

Parish	Percentage	Annual SM Figure
Ashurst	0.17%	2
Ashington	1.64%	22
Broadbridge H	3.77%	50
Billingshurst	7.16%	96
Bramber	0.55%	7
Cowfold	1.27%	17
Colgate	3.08%	41
Henfield	4.25%	57
Itchingfield	1.09%	15
Lower Beeding	0.74%	10

Parish	Percentage	Annual SM Figure
Nuthurst	1.27%	17
North Horsham	14.74%	197
Pulborough	4.02%	54
Parham	0.16%	2
Rusper	1.30%	17
Rudgwick	1.86%	25
Slinfold	1.50%	20
Shermanbury	0.39%	5
Shipley	0.87%	12
Southwater	7.40%	99

Standard Methodology - Indicative Housing Numbers

Parish	Percentage	Annual SM Figure
Storrington	5.31%	71
Steyning	4.14%	55
Thakeham	1.57%	21
Upper Beeding	2.48%	33
West Chiltington	2.48%	33
West Grinstead	1.90%	25
Woodmancote	0.35%	5
Warnham	1.43%	19
Washington	1.34%	18
Wiston	0.15%	2

Ward	Percentage	Annual SM Figure
Denne	8.35%	112
Forest	7.97%	107
Trafalgar	4.17%	56
Blueprint Total	20.49%	274

Standard Methodology - Indicative Housing Numbers

- Tables should be treated with caution:
 - Standard method figure changes twice per year
 - Doesn't account for commitments
 - Doesn't take account of constraints

Questions – for later workshops

- Should existing commitments reduce the housing numbers for the individual parishes where proposals are located, or should it be taken off the district-wide figure?
 - Should the approach differ depending on whether the commitment is for strategic level development?
- Should an adjustment be made to reduce numbers for areas which have seen high levels of growth?
 - What is considered high? How would housing numbers be reapportioned?
- Should constraints impact the indicative housing numbers?
 - Which constraints? How would housing numbers be reapportioned?

NPPF Paragraph 14

- Recognise that the housing numbers likely much higher than previous Neighbourhood Plans
- Council is very unlikely to have a sufficient housing land supply to disengage 'tilted balance' in short-medium term
- Opportunity exists to get some protection by adopting a plan that meets housing needs
- NPPF Para 14 suggests that the 'presumption in favour' ('tilted balance') **is likely to be outweighed** where:
 - a) the neighbourhood plan became part of the development plan five years or less before the date on which the planning application decision is made; **and**
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement.
- Sandy Lane, Henfield – one of the central reasons for refusal at appeal.
- Protection not absolute – there have been recent appeal decisions elsewhere where approvals still been given despite Neighbourhood Plan meeting the requirements of NPPF para 14
- Council has very low five year supply and the operation of this paragraph in the short term may be challenging given government 'push' for increased housing delivery.

HDC's Legal Duty

- Agreeing and Designating Neighbourhood Plan Areas
- Agreeing and Designating Neighbourhood Forums
- Certifying compliance with the 'basic conditions' and statutory requirements and obligations
- Publicising the Plan, organising the Reg 16 consultation and receiving/processing representations
- Organising and funding an independent examination
- Organising and funding a referendum
- General duty to support
- Duty to 'make' the plan



HDC's Duty to Support

- To advise on technical issues and provide support in key areas such as Sustainability Assessments and Habitat Regulations Assessments
- Work closely with consultants nominated by the Qualifying Bodies,
- Assist and advise on changes to national policy
- Assist and advise on policy drafting,
- Provide healthchecks at strategic milestones throughout the process
- Advise you on which external organisations and statutory bodies you will need to consult



HDC's Duty to Support



- An open and constructive working relationship. HDC has legal duty to support neighbourhood planning,
- Challenging landscape in terms of planning agenda and changes to the local government,
- To work closely together at all levels, both in policy, and in strategic issues of importance,
- To respect each other's views, and where different, after discussion to ensure proper understanding of the reasons for such differences,
- Share the Council's evidence base and advise on potential 'gaps' local groups should address, and
- To minimise duplication of activity wherever possible

What we can't do

- Writing documents (this is your plan!)
- Undertaking survey work (but can comment on questionnaires and methodology if requested)
- Attending every meeting (due to time and resource constraints)
- Attending every consultation event (as above)
- Provide direct financial support





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Workshops



Workshops - Objective

- To hear your views on issues impacting indicative housing calculations
- Provide feedback on how we can 'fine tune' our offer of support
- Raise any other queries / feedback
- Workshop work will feed into Neighbourhood Plan guidance which will be issued to the Qualifying Bodies.
- Email: neighbourhood.planning@horsham.gov.uk



Workshops – Key Questions

- ❑ Should existing commitments reduce the housing numbers for the individual parishes where proposals are located, or should it be taken off the district-wide figure?
 - *Should the approach differ depending on whether the commitment is for strategic level development?*

- ❑ Should an adjustment be made to reduce numbers for areas which have seen high levels of growth?
 - *What is considered high? How would housing numbers be reapportioned?*

- ❑ Should constraints impact the indicative housing numbers?
 - *Which constraints? How would housing numbers be reapportioned?*



Workshops – Breakout Groups

Room	Parish	Officer
Room 3	Ashington	Catherine Howe
	Bramber	Tal Kleiman
	Itchingfield	Clark Gordon
	Rusper	
	Slinfold	
	Storrington	
	Washington	
	Southwater	
Room 6	Wamham	
	Shipley	Julia Hayes
Room 7	Nuthurst	
	West Grinstead	Matt Bates
Room 8	Pulborough	
	Shermanbury	Rebecca Fry
	Billingshurst	
Room 9	Thakeham	
	Rudgwick	Norman Kwan
	Trafalgar	Andrew Ashcroft
	Denne	
	Forest	
	Henfield	
	Upper Beeding	



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Feedback

