



Horsham  
District  
Council

# Horsham District Council Local Development Scheme

2025 – 2028

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## Introduction

1. The Local Development Scheme (LDS) is the Council’s timetable for preparing its Local Plan. The Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) requires the Council to prepare and maintain an LDS.
2. This iteration of the LDS has been produced at a time when the Levelling Up and Regeneration Act 2023 has triggered a new process for preparing a local plan. The regulations which will govern this process are yet to be produced (they are expected in Autumn 2025). The National Planning Policy Framework (NPPF) published in December 2024 sets out transitional arrangements for local plans currently in preparation, and confirms that plans already submitted to the Secretary of State can continue to be examined under the current regulations: the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
3. However the NPPF also makes clear that if the housing requirement in the plan to be adopted meets less than 80% of local housing need, the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.
4. In connection with planning reforms currently underway, the Government has asked all plan-making authorities to provide to them an updated LDS no later than 06 March 2025. This reflects the Deputy Prime Minister’s intention to make rapid progress towards universal plan coverage.
5. Given these circumstances, the Council has prepared respective timetables for two phases of plan-making. The first timetable sets out the Council’s estimation of timings for the Horsham District Local Plan 2023-2040 which is currently undergoing examination. The second timetable sets out a provisional timetable for a review of the Horsham District Local Plan under forthcoming provisions supporting the Levelling Up and Regeneration Act 2023. These are set out in Tables 2 and 3 of this document.

## Risks and uncertainties

6. Despite the advanced stage of the Horsham District Local Plan, a combination of national planning reforms, forthcoming local government devolution and the recent cancellation of examination hearing sessions means there is very considerable uncertainty as regards the timetables put forward. Table 1 below sets out the key risks, and what impact these may have. Specific mitigation measures are not proposed as all the risk factors are outside the control of the Council.

*Table 1 – Risks to local plan production in Horsham District*

Risk	Outcome if risk is realised
<p>The Local Plan examination has been paused by the Inspector because he has “significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas”. Hence there is a significant risk that, subject to his further consideration, the Inspector will recommend withdrawal of the Plan.</p>	<p>The Local Plan would have to return to an earlier stage and significant work be undertaken. There would remain no up-to-date local plan for the foreseeable future.</p>

Risk	Outcome if risk is realised
<p>A further review of the Local Plan to meet increased housing targets is dependent on updated regulations being published and coming into force, and clarity being provided on the scope of local plans prepared under the new system (given Government's intention to produce National Development Management Policies). Government is advising that the new regulations will come into force in Autumn 2025. Whilst some preparatory work on plan making could be undertaken, a review cannot formally begin until the regulations come into force.</p>	<p>Should the current version of the Plan not be adopted, this will result in there being no up-to-date local plan until a review under the new planning system has been completed, likely to be in 2028 (this being subject to devolution – see row below).</p>
<p>The Devolution White Paper (MHCLG, December 2024) proposes a timetable for the creation of unitary authorities to replace all current lower and upper tier local authorities. The West and East Sussex area together with Brighton and Hove, is confirmed as being in the first phase of these reforms. It is therefore anticipated that the new unitary Councils will be fully in place by 2028. It is not yet clear how a review of the Horsham Plan could be completed before the abolition of the current District Council and replacement with a new unitary authority.</p>	<p>The Council together with its partner authorities will need to determine how best to progress local plan-making under the new structure. It seems likely that a District-level Plan review would be abortive, and there would be a significant time delay to completing a unitary plan due to the need to establish joint working structures.</p>

7. It can be seen from Table 1 that failure to progress the examination of the current iteration of the Local Plan would result in a 'planning vacuum' and no up-to-date local plan coverage for Horsham District until at least 2028. The Council would therefore strongly prefer for the examination to conclude and the Horsham District Local Plan 2023-2040 be adopted. However this can only happen if the Local Plan Inspector ultimately finds the Plan sound. The Council accepts that modifications may need to be made to the Plan to enable this to happen.

## Horsham District Local Plan 2023-2040 timetable

8. Table 2 sets out the stages of production of the Horsham District Local Plan 2023-2040. As the Plan is currently in examination, the timetable is dependent on whether or how the Inspector decides to progress the examination.

Table 2 – Prior and estimated timetable for production of the Horsham District Local Plan 2023-2040

Subject matter: Horsham District Local Plan 2023-2040	
Geographical Area: Horsham District	
Stage of production	When undertaken
Consultation on Issues and Options for Employment, Tourism and Sustainable Rural Development (Regulation 18)	April – May 2018
Consultation on draft Local Plan (Regulation 18)	February – March 2020
Regulation 19 Plan preparation	April 2020 – December 2023
Publication of Regulation 19 Proposed Submission Local Plan and period of representations	January 2024 – March 2024
Submission of the Horsham District Local Plan 2023-2040 (Regulation 22)	26 July 2024
Examination hearings Stage 1	10-12 December 2024
Examination paused by the Inspector	12 December 2024
Examination resumes – further work and further hearings	March – September 2025
Main Modifications consultation	October – November 2025
Receipt of Inspector’s Report	February 2026
Adoption	April 2026



Here currently

## Horsham District Local Plan Review timetable

- As explained above, should the Horsham District Local Plan 2023-40 progress to adoption and have a housing requirement that meets less than 80% of housing need (as defined by the Standard Housing Method – i.e. 1,357 homes per annum), the Council will be expected to begin work on a new plan under the revised plan-making system. The NPPF (paragraph 236) states that this should begin “as soon as the relevant provisions are brought into force in 2025” and is “in order to address the shortfall in housing need”. In the circumstance that the Local Plan does not progress to adoption, and subject to the outcomes of devolution, the Council may similarly need to prepare a new Local Plan under the new system.

10. The Council first considered how a timetable might look for a new local plan in preparing its Response to Action Point 1 and 17 as part of the extant examination. This is published as HDC41<sup>1</sup>. This response includes on page 7 a table titled Timescales for Horsham District, which is based on the Council's understanding of the emerging new system as envisaged in the Levelling Up and Regeneration Act 2023 and accompanying documents.
11. That table is reproduced here as Table 3, and represents the Council's 'best guess' as to how a new Local Plan might progress against the currently understood 'stages' and 'milestones'. It should be stressed that given the current lack of any published regulations or guidelines, the Council has had to make some assumptions – for example, that the new regulations governing local plan-making will come into force in Autumn 2025. The timetable is designed to complete within 30 months, starting from the submission of the Project Initiation Document (Gateway 1).
12. It is clear from the timetable shown in Table 3 that the likely date of submission would be November 2027, and an examination would extend beyond the assumed date of elections for a new unitary authority to be established under the forthcoming Devolution Bill. This means that the new District level plan would be due for adoption at a date later than the formal abolition of the District Council. It is therefore unclear as to whether or how the reviewed District Local Plan could be legally adopted following its preparation.

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<sup>1</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0005/143573/Response-to-Action-Point-1-and-17-Matter-1-Issue-1,-Matter-1-Issue-2,-Matter-2-Issue-1,-Matter-2-Issue-2,-Matter-2-Issue-3-,.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0005/143573/Response-to-Action-Point-1-and-17-Matter-1-Issue-1,-Matter-1-Issue-2,-Matter-2-Issue-1,-Matter-2-Issue-2,-Matter-2-Issue-3-,.pdf)

Table 3 – Timescales for Horsham District Local Plan Review

<b>Subject matter: Horsham District Local Plan Review</b>		
<b>Geographical Area: Horsham District</b>		
<b>Stage of plan making</b>	<b>Time required</b>	<b>Date of commencement / submission</b>
Council to give notice of start of plan-making	n/a	Oct 2025
Scoping and early participation	4 months	Oct 2025
<b>Gateway 1: Project Initiation Document review</b>	<b>n/a</b>	<b>Feb 2026</b>
Plan vision and strategy development (preparation)	3 months	Feb 2026
Mandatory public consultation on plan vision and strategy	8 weeks	May 2026
Analysis of consultation responses on vision and strategy  &  Production of soundness evidence and continuous engagement with Members	8 months	Jul 2026
<b>Gateway 2: Progress and compliance with certain matters</b>	<b>n/a</b>	<b>Mar 2027</b>
Further evidence gathering and engagement following Gateway 2 assessment	3 months	Mar 2027
Mandatory public consultation on final draft plan	6 weeks	Jun/Jul 2027
<b>Gateway 3: Stop/Go assessment (mandatory)</b>	<b>4 weeks</b>	<b>Sep 2027</b>
Submission and Examination	6 months	<b>Nov 2027</b>
Reporting to Council following Inspector's letter	2 months	May 2028
<b>Adoption</b>	<b>n/a</b>	<b>Jul 2028</b>
<i>Total duration from Gateway 1 to Adoption</i>	<i>29 months</i>	

## Summary

13. The Council has considered likely scenarios for progressing plan-making for Horsham District. The two possible scenarios in this document are:
  - A. The Inspector conducting the ongoing Horsham District Local Plan examination decides that the examination can continue, and ultimately finds the Plan sound. This could allow the Council to achieve adoption of the Horsham District Local Plan 2023-2040 by March 2026. A review of the Local Plan would commence around Autumn 2025, most likely in parallel with consultation on Main Modifications. The review could complete at the time of the adoption of the new plan, in/around July 2028, but there will be legal barriers to adoption, and the Plan may be immediately obsolete given the potential abolition of the District Council by that time.
  - B. The Inspector conducting the ongoing Horsham District Local Plan examination concludes that the Plan cannot be found sound / legally compliant. The Council begins informal work on a new Local Plan to be progressed under the new planning system as provided for in the Levelling Up and Regeneration Act 2023. A formal review would then commence around Autumn 2025. The Plan review could complete and be adopted, in/around July 2028, but there will be barriers to legal adoption, and the Plan may be immediately obsolete, given the potential abolition of the District Council by that time.
14. Under Scenario A, up-to-date local plan coverage would be achieved in short order, albeit subject to immediate review, which would in turn take account of the new local housing need figure or an alternative figure for a new unitary council. Under Scenario B, there would be no up-to-date local plan coverage for Horsham District until at least 2028 which would mean a long period with no up-to-date local plan in place. In either scenario future work could be subsumed into a new unitary local plan.