

Horsham Local Plan EIP

Matter 2: Housing Supply and Headroom

a. The housing supply trajectory as proposed.

1. The trajectory in Appendix the Topic Paper to Matter 2 (HDCJB05a) indicates that the Council 15,430 homes to be delivered over the plan period. This is a surplus of 750 homes against the needs of Horsham as calculated in the Matter 1 Topic Paper (HDCJB04) but a shortfall of 2,398 homes when the unmet housing needs of Crawley are included in the Council's housing requirement.

b. The reliability of housing delivery assumptions / allowance for non-delivery.

2. No comment.

c. The reliability of assumptions about windfalls.

3. The evidence in HO9 indicates that windfall development in Horsham has averaged around 158 homes per annum. Table 2 of HO9 shows that these windfalls (98 dwellings) were on small sites with 60 homes coming forward on sites of 10 or more homes. HBF are concerned that there can be no certainty that developments on larger sites in particular will continue to come forward at the same rate across the plan period. It is notable that 40% of the larger sites came forward on greenfield sites and it is questionable that once the plan is adopted such sites will be a regular part of windfall. It is also notable that windfall on larger sites includes two years (2017/18 and 2018/19) where windfall on PDL sites was above 100 dwellings. Outside of those years windfall on such sites was just 15 homes with three of those years.
4. HBF recognises that some sites are likely to come forward on larger sites but given the erratic nature of supply it should not be relied upon within the housing trajectory. HBF would suggest that the windfall requirement reflect past delivery rates from sites of 1 to 9 dwellings only.
5. Windfalls are included in the trajectory from 2028/29. On the basis that the trajectory includes commitments up to February of this year and the Council expect some of those commitments to deliver post 2028/29 HBF would suggest not including any windfall until 2029/30 to ensure no

double counting. As the very least windfall in 2028/29 should be reduced.

d. The robustness of the trajectory.

6. Our concerns regarding the robustness of the assessment are set out above.

e. Maintaining adequate housing land supply including a rolling 5 year supply.

7. Using the Sedgefield method for assessing five year land supply the Council will not have a five year land supply from the date adoption, assuming this is in the 2026/27 against their own housing needs. On adoption HBF estimate the Council will have a 4.97 year land supply. However, this is without a buffer, which is not required by the NPPF23 against which this plan is being examined. In reality on adoption Council will be required to have a 20% buffer on the basis of paragraph 78c of NPPF24 as housing requirement will be less than 80% of the 1,338 dpa they would be expected to plan for under the current Framework. With a 20% buffer the Council would not be able to show a five year land supply against their own needs until 2030/31.

8. While the Council have provided estimates in Table 3 of their Matter 2 Topic Paper as to the potential supply to address unmet housing needs of Crawley no annualised trajectory has been provided and it is therefore not possible to provide any comment at this stage.

f. Headroom, resilience and the mitigation of risk.

9. To ensure that the plan is both positively prepared and effective the Council must be able to demonstrate that needs are meeting full over the plan period and that the plan is deliverable. A key part of this is ensuring there is some contingency land supply in recognition that development rarely comes forward as expected – especially on larger more complex sites. As to the level of contingency required there are no hard and fast rules to the level of headroom that will ensure needs are met in full. HBF recommend that the minimum required is 10% but this should be closer to 20% for where there is a reliance on strategic sites. HBF would also recommend that this flexibility is not solely at the end of the plan period.

10. On the basis of the trajectory in Appendix 1 to the Topic Paper, the risk for this local plan is that supply is insufficient in the early years of the plan and that any delays in larger sites coming forward will leave the Council without a five year land supply. In order for the plan to be considered effective and positively prepared it must look to allocate more small and medium sized sites that provide flexibility and contingency early in the plan period.

g. Whether the housing requirement should be stepped.

11. A stepped housing requirement should only be used as a last resort. In the first instance plans should look to ensure that housing supply supports the delivery of a flat housing requirement across the plan period. Where plans cannot show sufficient supply in the early years of the plan this will require the Council to identify smaller sites that could boost supply in those early years rather than seek to remedy the failing through a stepped requirement. Only after such an exercise has been carried out should a stepped trajectory be considered appropriate.

h. Whether additional housing allocations are required, and if so, of what kind / size / timing.

12. HBF consider it necessary for additional sites to be allocated in order to address half of the identified unmet needs in the neighbouring area of Crawley with further allocations required to address some of the identified unmet needs arising in Brighton and Hove, Worthing and Mole Valley. On basis of the trajectory and the shortfalls in the early years of the plan the Council should look to allocate small and medium sized sites in the first instance in order to boost supply in the short term before consider additional strategic sites that will deliver towards the end of the plan period.

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