

Examination of the Horsham District Local Plan 2023-2040

Hearings: week 1 - April 2026

Written statement from Fenella Maitland-Smith¹, Save West of Ifield

Matter 2: Housing supply and headroom

a. The housing supply trajectory as proposed

No comment.

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

HDC's Matter 2: Housing supply and headroom Topic Paper could do more to explore the reliability of delivery and the robustness of the trajectory.

HDC state that their trajectory can be "relied upon" (paras 14 and 15 of HDC's) but do not explain why. The assumptions behind the trajectory are not acknowledged or explained. The trajectory appears to have been based solely on HDC's "strong track record of delivery" (para 13), and on their recent discussions with developers (para 14).

Of course build-out rates since 2021 have been affected by the constraints of water neutrality, and possibly COVID. So it would be helpful if HDC could be more specific about the period referred to as the "strong track record of delivery". Possibly from 2016 to 2019. But if so, then we note that Help to Buy and low interest rates were stimulating demand both from households and investors during that period. The reference to strong delivery should be clarified.

Looking forwards, there is no discussion of uncertainty in the Plan, nor of the resulting risks to delivery of the trajectory and hence the mitigations needed to manage the risks and uncertainty. Surely HDC should acknowledge the current and possible future economic and market uncertainties that could depress build-out rates?

This is particularly important if there are already local pockets of weakness that should be acknowledged? Table 2 states that only 8% of the 2015 allocation at Mowbray has been completed – why is this? How does its delivery compare to its planned trajectory? And how is the delivery of Kilnwood Vale progressing – is it correct that around 50% has been delivered?

c. The reliability of assumptions about windfalls

No comment.

d. The robustness of the trajectory

Assumptions about the future also include assumed commencement and build-out rates for new allocations such as the West of Ifield. The trajectory may be "based on ongoing engagement with developers through plan preparation" (para 19) but the robustness of developers' projections may be open to question. This is not acknowledged and mitigation not discussed.

For example, the West of Ifield is a challenging site with many outstanding issues to be resolved (statutory consultees to the current application have either objected or identified a significant volume of information missing from the application around how impacts and risks are to be mitigated). Such a challenging site as this, with many outstanding issues, including financial viability, is likely to be delivered late.

HDC could also address how delivery of affordable housing will be ensured in line with policy targets.

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

No comment.

f. Headroom, resilience and the mitigation of risk

Should HDC be expected to propose a level (%) of headroom which they think would be prudent and commensurate with the degree of risk and uncertainty around delivery of the trajectory? In other words, taking into account any

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concerns about reliability and robustness of delivery assumptions, as identified in points a to d above, how much headroom is needed to mitigate the risks to delivery? It seems HDC has not taken this approach.

Table 3 suggests various “growth options” but doesn’t indicate which might be appropriate. For all options the headroom is calculated with reference to the requirement identified in the Topic Paper for Matter 1, which includes meeting 50% of Crawley’s unmet need. Given HDC has stated that this would be challenging, does this suggest that a higher level of headroom is required?

g. Whether the housing requirement should be stepped

No comment.

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

No comment.