



Horsham  
District  
Council

# Horsham District Council Regulation 19 Local Plan

## Topic Paper 2: Housing Supply

September 2024

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## Key Policies Covered

### Strategic Policy 37 – Housing Provision

## 1 Introduction

- 1.1 This Topic Paper has been prepared by the Council in response to Questions asked by the Inspector to his Preliminary Matters on Housing Land Supply (23 August 2024) (IDO1).
- 1.2 Policy 37 (Housing Provision) of the Horsham District Local Plan 2023-2040 sets out how the Council seeks to make provision for at least 13,212 homes in the plan period. It proposes a stepped housing trajectory, with a lower delivery of homes in the early part of the plan period, with this rising in the mid – late plan period. The evidence base documents H08a and HO8b provide background as to how this figure was derived, together with a detailed trajectory. This was informed by the most up-to-date housing completions data and evidence provided to us by the development industry available to the Council at the point of plan preparation.
- 1.3 In his letter dated 23 August 2024, the Inspector requested a topic paper on housing supply and requested that it cover:
- i) analysis of total supply over the Plan period;
  - ii) explains how this relates to the Plan’s Spatial Strategy; and that it
  - iii) also explains how any under supply has been accounted for in the Plan, together with justification for the Council’s approach.
- 1.4 In preparing this paper, the Council has taken account of the most up-to-date information and evidence relating to housing completions, together with information from developers on site progress in relation to sites included in the Council’s Local Plan trajectory. In this respect, the Council wrote to developers of sites included in the Housing Trajectory in April 2024 requesting updates on their expected delivery rates. The Council has also finalised site completions data for 1 April 2023 – 31 March 2024, (in conjunction with West Sussex County Council).
- 1.5 The following sections of this paper are structured as follows:
- Section 2 – National Policy Context
  - Section 3 – HDC Spatial Strategy
  - Section 4 – Projected Housing Supply
  - Section 5 – Five Year supply calculation
  - Section 6 – Conclusions and Next Steps

## 2 Policy Context

### National Policy and Planning Guidance

- 2.1 In December 2023, a revised National Planning Policy Framework (NPPF) was published. Paragraph 230 (Annex 1) sets out transitional arrangements for plan-making. The Horsham District Local Plan 2023 – 2040 (HDLP) reached regulation 19 stage (pre-submission) before 19 March 2024. It will therefore be examined under the September 2023 version of the NPPF. For this reason, any references to the NPPF in this topic paper should be assumed to be references to that document unless stated otherwise.
- 2.2 The NPPF and National Planning Practice Guidance (NPPG) make clear that for plan making, local planning authorities are required to assess the level of housing need using the standard method as the starting point for plan making, and as a minimum seek to meet this level of need unless there are exceptional circumstances which justify an alternative approach. (NPPF **paras 60-62**)
- 2.3 In examining local plans, **paragraph 35** of the NPPF requires that plans are positively prepared, justified, effective and consistent with national policy. In the context of housing delivery, this requires the plan to demonstrate how any proposed allocations are deliverable over the Plan period. **Paragraph 68** makes clear the need for local planning authorities to demonstrate an understanding of which sites in their area are available, suitable and viable to help meet this need. This includes the need to identify “specific, deliverable” sites for the first five years of the Plan period as well as “specific, developable sites or broad locations” for years 6-10 and 11-15.
- 2.4 **Paragraph 71** deals with windfall sites, and states that, if relying on an element of windfall sites as part of wider housing supply, there should be evidence that this will be a reliable supply.
- 2.5 **Paragraph 74** requires strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period and to identify, supported by annual updates, a supply of specific, deliverable sites sufficient to provide a minimum of 5 years’ worth of housing against their housing requirement. It requires the supply of sites to include a buffer (moved forward from later in the plan period) of:
- a) 5% to ensure choice and competition in the market for land; or
  - b) 10% where the local planning authority wishes to demonstrate a 5-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - c) 20% where there has been significant under delivery of housing over the previous 3 years, to improve the prospect of achieving the planned supply.
- 2.6 The appropriate buffer is determined by the Housing Delivery Test (HDT), an annual test which measures the number of homes delivered in an area against the requirement. The buffer should ensure there is a realistic prospect of achieving the planned level of housing supply and that there is choice and competition in the market. The minimum buffer for all authorities is 5%.
- 2.7 In defining “deliverable” and “developable” sites, the NPPF (Annex 2) and NPPG provide clear advice which the Council has had regard to in its assessment of housing supply. In identifying a site as **deliverable**, the Council must rely on evidence which demonstrates the sites are:
- “available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years. In particular:*
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless*

*there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 2.8 The NPPG suggests that progress towards reserved matter approval, towards submission of an application, or with site assessment work may be considered sufficient evidence, as would relevant information about viability, infrastructure provisions and ownership constraints.
- 2.9 In order to be considered **developable**, “sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.

### 3 Horsham District Spatial Strategy

- 3.1 The Council has provided a paper which sets out an explanation of how it arrived at an appropriate Spatial Strategy founded on the principles of sustainable development. (Topic Paper [HDC02](#)). It explains that the Council’s starting point for plan making was the standard methodology target (currently 917 homes per annum). In arriving at a spatial strategy for growth, it took account of
- a range of spatial growth options – to inform the broad location of any growth,
  - the outcome of the detailed site assessment process in assessing options for housing allocations,
  - the wider capacity of the market to accommodate growth
  - the impact of the Natural England Position Statement (September 2021) – (CC08), which has significantly impacted on the delivery of housing since its publication.
- 3.2 It was concluded that 13,212 new homes could be delivered in the Plan period. This equates to an annualised target of 777 new homes a year, with a lower target of 480 per year for the first five years (including a 10% buffer) reflective of the lack of pipeline supply sites and permissions. This increases to 901 homes for the rest of the Plan period.
- 3.3 Whilst it is recognised that 777 is below the standard housing need figure of 917 homes per annum, [HDC02](#) provides a summary of the exceptional circumstances that impact the ability of the District to deliver significant levels of growth over the Plan period without conflicting with the requirements for sustainable development in NPPF para 11 footnote 7.

#### Analysis of housing supply over the plan period

- 3.4 The identification of sites for allocation in the HDLP has been informed by both the Strategic Housing Land Availability Analysis or (SHLAA) 2018 (evidence base document H13) and the Site Assessment Report (evidence base document H11, parts A-F). The SHLAA assessment provided an initial high-level assessment as to the suitability and deliverability of the range of potential development sites that had been provided to the Council, including through its “call for sites”. The Council’s Site Assessment Report (SAR) then undertook a more detailed site assessment. Section 2.7 to 2.22 of that document provides further detail in relation to the shortlisting of sites.

## Site Availability and Suitability

- 3.5 In broad terms, the majority of sites have been proposed to the Council or were identified through the Council's own research and can be considered 'available' for development during the Plan period. This is because these sites are being actively promoted through 'Calls for Sites', planning applications, or submitted to Parish Councils as part of the process of neighbourhood plan preparation. However, where specific land availability information is known which may impact on build out rates (such as sole ownership / control by a single landowner, or developer), this has been recorded where relevant.
- 3.6 The broad suitability of sites was informed by the outcome of the criteria-based assessment, the conclusions of which form the main components of document H11. Where sites were assessed as both available and suitable for development, the deliverability of the development was also considered.

## Deliverability and Viability Considerations

- 3.7 It is necessary to ensure that housing development can take place over the whole Plan period up to 2040, with consideration as to whether sites will come forward in the short, medium or longer term. A range of information has informed the assessment of the deliverability and viability of sites as follows:
- **Housing completion data** – monitoring of housing completions is undertaken on an annual basis. As well as providing data on the number of completions in any one calendar year and informing the calculation of a 5 year supply position and the housing delivery test, completions data also provides insight into the ongoing deliverability of larger and strategic sites, which are building out over a number of years. In preparing this paper, the most recent housing completions data for 2023/2024 has become available and has been incorporated into the updated trajectory (see Appendix 4).
  - **Site delivery information provided by site promoters** – HDC has had ongoing engagement with site promoters throughout the process of plan preparation. Data on the expected build-out rates has been requested to help inform the development of the Council's housing trajectory. The most recent request for information was sent in April 2024. Responses provided have been evaluated, with consideration given as to whether proposed timescales were realistic (e.g. in relation to expected progress of planning applications, start dates and projected build-out rates), but have nevertheless informed the most recent trajectory (See Appendices 2 and 3). It should be noted that this information is not always universally available or provided to us by site promoters.
  - **Progress towards a water neutrality solution** – A limited number of sites in the Council's housing trajectory predate the receipt of the Natural England Position Statement and had all necessary conditions in place to enable the continuation of development. All other sites within the trajectory are required to demonstrate water neutrality. The Sussex North Offsetting Water Scheme (SNOWs) has been developed to ensure that policy compliant development sites can access water credits, in order that development can come forward. Notwithstanding this point, some site promoters have sought to find alternative solutions to water neutrality prior to SNOWs becoming operational. Where alternative solutions have been identified and are being progressed by site promoters, this has been documented by the Council.
  - **Planning Application Progress** – The planning application status of sites contained within the Council's trajectory has been recorded, with the relevant planning application references documented where they exist. Certain sites in the trajectory already have detailed (full or reserved matters) permission. Where no permission yet exists, or outline permission only is in place, additional information on the progress towards a detailed planning permission has been recorded.

- **Progress with site assessment work to support a planning application** – In many cases (particularly strategic sites) it is expected that detailed studies will be required in order to support the submission of any planning application. Where known, progress towards the completion of these studies (including records of their submission in support of any planning application) has been recorded.
- **Site Viability** – HDC has undertaken a viability assessment of the Local Plan (Evidence Base Document H12). The assessment has considered the viability of strategic sites, and also those of a number of other site typologies. The outcome of this study has indicated that the sites allocated in the local plan are viable when taking account of the various policy requirements. In the event that specific viability issues are identified for any specific site, provision has been made for this to be documented.
- **Infrastructure provision** – where known, notes have been recorded into the timescale of any infrastructure to support the delivery of the scheme – e.g. whether this is scheduled to take place early / in advance of housing completions. This information has been used to inform the potential timescale of any delivery.

3.8 The details of this information are set out in the revised Local Plan Housing Trajectory 2023-2040 (Appendix 1) of this document. As with all housing trajectories, it provides the position at the point of time that it was completed. Information informing the trajectory, (such as planning application progress) is continually reviewed and updated as part of the Council's ongoing housing monitoring work.



## 4 Projected Housing Supply 2023-2040

- 4.1 **Appendix 1** (Housing Trajectory 2023-2040, as at 27<sup>th</sup> September 2024) provides a comprehensive schedule of planning permissions and other identified sites within Horsham District. Table 1 below sets out the different components of the overall housing land supply for the Plan period (2023-2040). For the avoidance of doubt, the base date of the plan is 1<sup>st</sup> April 2023. This indicates that over the course of the plan period, a total of 13,412 dwellings will be provided.

**Table 1: Total Local Plan Housing Supply over Plan Period (2023-2040)**

Housing Supply (2023-2025)	No. Of Dwellings
Net Completions 1 <sup>st</sup> April 2023-31 <sup>st</sup> March 2024	452
Projected Net Completions 1 <sup>st</sup> April 24- 31 <sup>st</sup> March 25	208
Housing Supply (2025-2040)	No. Of Dwellings
Strategic Sites Categories A and B	3,808
Category A Large Permissions (5+)	347
Neighbourhood Plan Sites Category A	207
Permitted Small Sites (1-4 dwellings)	260
Category B Outline Permissions 10+	682
'Made' Neighbourhood Plan Sites Category B	901
Local Plan - Draft Strategic Allocations	3,325
Local Plan - Smaller Site Allocations	1,782
Windfalls	1,440
<b>TOTAL PROJECTED HOUSING SUPPLY (2025-2040)</b>	<b>12,752</b>
<b>TOTAL HOUSING SUPPLY (2023-204)</b>	<b>13,412</b>

4.2 Taking account of the housing completions for the period 2023-2024, and projected completions for 2024-2025 the dwellings left to be delivered (2025-2040) in the Plan period are grouped into the following categories set out in Table 2. Based on the assessment shown in the table, there are 3,186 homes expected to be delivered in the five year period 2025/26 to 2029/30, with a further 9,566 being completed between 2030/31 and 2039/40. This gives a total of 12,752 dwellings. Further detail on the categorisation of sites in years 1-5 and 6 years plus is set out in the following paragraphs.

**Table 2: Projected Local Plan Housing Supply 2025-2040, Years 1-5 and years 6-15.**

Category	ESTIMATED COMPLETIONS		
	YEARS 1-5 (2025/26- 2029/30)	YEARS 6-15 (2030/31- 2039/40)	YEARS 1-15 (2025-2040)
Strategic Sites Categories A and B	1,481	2,327	3,809
Category A Large Permissions (5+)	347	0	347
Category A Neighbourhood Plans	207	0	207
Permissions (1-4 dwellings)	260	0	260
Category B Outline Permissions 10+	179	503	682
Category B Neighbourhood Plan Sites	62	839	901
Local Plan - Draft Strategic Allocations	350	2975	3325
Local Plan Smaller Site Allocations	60	1,722	1,782
Windfall	240	1,200	1,440
<b>TOTAL</b>	<b>3,186</b>	<b>9,566</b>	<b>12,752</b>

4.3 The sites included in years 1 – 5 of the Local Plan housing trajectory (2025/26 to 2029/30) (Appendix 1) have been subject to a comprehensive consideration of the sites' deliverability, suitability and achievability in line with the requirement outlined in the NPPF (para 68 and Annex A) and as outlined in section 3 above. Other factors that have been taken into account include: engagement with site promoters; working with the Council's Development Management team; and working with West Sussex County Council to finalise dwelling completion and commitment numbers.

4.4 Sites in the trajectory are considered deliverable where they have a realistic prospect of being delivered in the next 5 years. This includes:

**Category A sites:**

- Site allocations in Neighbourhood Plans or Local Plan strategic sites with detailed permission;
- 'Large' Sites with detailed permissions (5 or more homes)
- Sites of fewer than 10 dwellings with outline permission.
- 'Smaller' sites with permission (1-4 homes).

**Category B sites:**

- Site allocations in 'Made' Neighbourhood Plans, Local Plan strategic sites and Local Plan 'Smaller Site' Allocations where there is no permission or only outline permission in place; and
- Sites with outline permission for 10 or more dwellings;

**Other:**

- Windfall development.

4.5 In order to establish which sites fall within Category A, Horsham District Council uses a definition of major / minor development which differs from the nationally described definition set out in Annex 2 of the NPPF. Instead, the threshold is set at 5 or more dwellings, consistent with the way West Sussex County Council has historically monitored housing commencements and completions across all West local authorities. East Sussex also follows this approach.

4.6 Annex 2 of the NPPF defines windfall sites as "sites not specifically identified in the development plan". Paragraph 71 of the NPPF states:

*"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."*

4.7 The Council has carried out analysis of its windfall delivery to support the preparation of the Local Plan. The Horsham District Council Windfall Study (evidence base reference H09) undertook an analysis of past windfall delivery trends over a 10 year period. This work demonstrates that the previous figure of 600 dwellings (or 120 dwellings per year for a 5 year period) remains an appropriate one to use for the Local Plan. A windfall allowance for development within the first 3 years of the plan period immediately following adoption (2025/26-2027/28) has not been included, as many of the sites that come forward within this period have already been captured within the Council's trajectory in the form of commitments and are in effect 'known'. The first 5-year period of the Housing Trajectory 27 September 2024 (2025/26 to 2029/30) therefore includes a figure of 240 dwellings (2 years of windfall supply) for years 4 and 5 (2028/29 and 2029/30). The windfall allowance is then carried across the remaining years of the Plan period. (2030/31 to 2039/40).

## 5 Five Year Housing Supply Calculation

5.1 The base date for the Horsham District Local Plan is 1<sup>st</sup> April 2023. At the time of publication of this Topic Paper, the Council is in year 2 (2024/25) of the new Plan period and therefore, has one year's worth of net housing completions which contribute to the housing target of set out in Strategic Policy 37.

### Net Completions against Targets 2023/24 and 2024/25 and Undersupply

5.2 Net completions for the first 2 years of the new Plan period are set out below in Table 3. Net completions in 2023/24 totalled 452, against a target of 480 – a deficit of 28 dwellings. For the year 2024/25, estimated completions have been used. This projected figure is 208 completions against the 480 dwelling target. This is a deficit of 272 dwellings. This is as a result of the significant impact of “water neutrality” which has slowed the ability of many sites to deliver, and the complexities involved in developing and delivering SNOWs.

5.3 Cumulatively, this gives a projected completions figure of 300 homes below the trajectory figure (660 completions vs 960 target) for the first two years of the Plan period (2023/24-2024/25), which will need to be factored into the remaining years of the Plan period in order to address under-delivery since 2023.

**Table 3: Local Plan Completions 2023/24-2024/25**

Year	Net Completions	Target (Comprising 436 homes and 10% buffer of 44 homes) from Policy 37	Number below target (undersupply)
2023/24	452	480	-28
2024/25	208	480	-272
<b>Total</b>	<b>660</b>	<b>960</b>	<b>-300</b>

5.4 The Council, in assessing how to apportion the undersupply, has considered whether it is appropriate to spread the shortfall of 300 homes over the entire Plan period (known as the ‘Liverpool Method’) or whether to add this to the next five years of the plan period (the ‘Sedgefield’ Method). In doing so, it has taken into account the nature and expected timescales for proposed delivery and the ongoing impact of the requirements for water neutrality.

- 5.5 Much of the proposed development within the Horsham District Local Plan 2023-2040 comprises development on strategic-scale sites. Whilst some of these are existing commitments, others are new allocations. Given the number of strategic scale sites which have come forward in Horsham District over recent years, the Council now has significant experience and understanding of the challenges in bringing forward larger sites which include the complexities involved in securing planning permission, infrastructure delivery and other necessary consents on larger sites which means first completions are more likely to come forward later in the Plan period. This has therefore been a significant factor in developing the housing trajectory, together with the later than projected submission of planning applications for these sites (as set out in paragraph 7.8 in Topic Paper HDC02).
- 5.6 While Land East of Billingshurst (Strategic Policy HA4) is expected to see completions from 2026/27, Land West of Ifield (Strategic Policy HA2) and Land North West of Southwater (Strategic Policy HA3) will not deliver their first homes until later in the Plan period. The later completions on the North West of Southwater site also reflect the fact that build out under the same site promoter on an adjacent site (Land West of Southwater, known as Broadacres) and another site approximately 2 miles away (Highwood, Horsham) are still ongoing, with completions on these sites expected in the six years between 2025/26 and 2030/31).
- 5.7 Section 6 of the Spatial Strategy Topic Paper ([HDC02](#)) provides detail on the impact water neutrality requirements have had on the number of applications permitted and the subsequent supply of homes, including the commitments in the early years of the Plan period. While the number of permissions for 2023/24 has increased against earlier years, this was reflective of the almost doubling in time taken to determine applications in 2023/24 compared with the period before the Water Neutrality Position Statement was issued by Natural England. In addition, while significant progress has been made to establish SNOWS, the scheme is not expected to have an immediate impact on the approval rate, and low completions are expected in the short- to medium term. Therefore, the allocation of the entire undersupply in the short to medium term risks this housing need not being delivered and an inability to demonstrate a five year housing land supply.
- 5.8 This, coupled with the fact that the Council has already proposed a stepped trajectory, means that the Liverpool method is judged to be most reflective of likely supply. It results in an additional 20 units per year to be added across the 15 year period from 2025/26 to 2039/40.

### Buffer to be added to Five Year Supply After Adoption (2025/26-2029/30)

- 5.9 Paragraph 74 of the NPPF sets out the requirements on local authorities to apply a buffer to the supply of specific deliverable sites in specific circumstances. It states that where there has been “significant under delivery of housing”, authorities should include a 20% buffer. This is clarified in footnote 41 to mean that where past delivery has fallen below 85% of the housing requirement. Whilst the Housing Delivery Test measurement for 2023 has yet to be published by Government, Table 4 below provides a projection of the Council’s expected result. This indicates that HDC has delivered 67% of its housing requirement over the years 2020/21, 2021/22 and 2022/23 and, therefore, a 20% buffer will need be applied to the overall housing requirement in the five years’ supply period.

**Table 4: Projected 2023 Housing Delivery Test Results**

	2020-21	2021-22	2022-23	Total
Number of Homes Required	625	1047	911	2583
Number of Homes Delivered	770	571	396	1737
<b>HDT Measurement</b>				<b>67%</b>

## Updates to projected completions from the point of Adoption

- 5.10 As has been outlined in this paper, a detailed assessment of projected delivery rates has been undertaken for the fifteen-year period after adoption. In particular, the impact of water neutrality has been to delay the submission and determination of applications. Therefore, delivery in 2028/2029 and 2029/2029 is lower than envisaged in the trajectory of January 2024 (HO8). Delivery does however increase in the mid to later years of the plan period, particularly from 2030/31 to 2035/36. However, delivery levels still remain within the capacity of the market to accommodate growth.
- 5.11 Whilst it is considered that the level of housing that can be identified in the Local Plan can be delivered over the plan period, to ensure a five-year supply can be demonstrated, a stepped trajectory with a lower target for the first five years from adoption (i.e. 2025/26 to 2029/30 is considered to be necessary) is required. This calculation uses the same initial target of 436 dwellings, which was included in the January 2024 Trajectory (as 480 included the then 10% buffer), and adds a) a 20% buffer and b) an additional 20 dwellings for the undersupply from 2023/24 to 2024/25. This takes the target of 436 dwellings per year for 2025/26 to 2029/30 to 543 dwellings per year. This is a total requirement of 2,716 dwellings in the five year period 2025/26 to 2029/30. An appropriate target for the remainder of the plan period (2030/31 to 2039/40) is calculated to be 950 homes a year (plus a figure of 20 dwellings per year for the undersupply), giving a target of 970 dwellings per year. Section 6 of this paper sets out the expected next steps in this respect.
- 5.12 Table 5 provides a summary of the detail in Appendix 1 on housing delivery in the first 2 years of the Plan period (2023/24 and 2024/25) and the five year period following adoption (2025/26 to 2029/30). Using 2023/24 as a start date, and taking into account the undersupply in years 1 and 2 of the Plan the annual housing target of 436 dwellings is adjusted to include a 20% buffer and uplift of 20 homes per year for the 5 years 2025/26- 2029/30. This gives a Total Annual Housing Target of 543 homes per year for these 5 years between – a total requirement of 2,716 dwellings. The projected supply of dwellings between 2025/26 and 2029/30 is 3,186 homes. This gives a five year supply calculation of  $(3,186/2,716) \times 5 = 5.9$  years.

**Table 5: Supply calculation including net completions from 2023/24**

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Annual Net Target	480	480	543	543	543	543	543
Cumulative Net Housing Requirement	480	960	1,503	2,046	2,589	3,132	3,675
Actual / Predicted Net Completions	452	208	537	642	646	721	640
Cumulative Net Completions	452	660	1,197	1,839	2,485	3,206	3,846
Cumulative Completions Below Housing Requirement	-28	-300	-306	-207	-104	+74	+171
<b>TOTAL HOUSING SUPPLY 2025-26 to 2029 to 2030</b>	<b>3,186</b>						

## 6 Conclusions and Next Steps

- 6.1 A housing trajectory provides a snapshot in time of future housing provision within an authority's area. The Housing Trajectory (January 2024) (Reference HO8) included within the Submission Horsham Local Plan provided a snapshot of delivery in Horsham District based on the position in 2023.
- 6.2 As set out in the introduction to this paper, the Council's predicted housing trajectory has been informed by a number of different factors ranging from the submission and determination of planning applications, housing completions data, and information provided to the Council by the development industry.
- 6.3 There is no evidence to indicate that the level of development that has been identified in the Horsham District Local Plan 2023-2040 cannot be delivered in full over the full plan period. However, the update to the housing trajectory indicates that, at this point in time, it will be necessary for the Inspector to recommend a modification to the submitted Strategic Policy 37 (Housing Provision) to reflect the realities on the ground, to ensure that the Council can demonstrate a five-year housing land supply from the point of plan adoption. The Council would be willing to assist the Inspector in this respect.
- 6.4 Whilst the data in the trajectory therefore provides the most up-to-date position available to the Council as of 27<sup>th</sup> September 2024, it should be noted that there are still some uncertainties with this figure which are not within its direct control. For example, whilst the Council has requested information from developers about their anticipated build-out rates, not all site promoters have submitted this information. It will also be necessary to continue to review the progress of planning applications as they are submitted to the Council and take account of the decisions that are reached. Should updates to existing information, or new information be provided to the Council (or the Inspector) during the Examination period, it is recognised this will need to be reviewed and updates made to the trajectory if appropriate. The Council confirms that it is happy to provide an update to this trajectory if requested, as a result of any relevant new information which may become available.