

View Comment

Document Section [▶ Draft Horsham District Local Plan 2019-...](#)
[▶ Housing \(Key Questions\)](#)
[▶ Policy 14 - Housing Provision \(Key Ques...](#)
[▶ Policy 14 - Housing Provision](#)

Comment ID /3171

Respondent [Campaign to Protect Rural Engl...](#)

Response Date 28 Mar 2020

Current Status Awaiting Processing

Response Type OBJECT

What is the nature of this comment?

Object

Summary Neither the NPPF nor the Guidance require the addition of a buffer, 5% or otherwise, to Standard Method calculated 'minimum annual local housing need. Because of Covid-19, a global recession more severe than the financial crisis in 2008-09 is now in prospect. How long the impact will last is uncertain. As is permitted by The Standard Method, MHCLG Guidance paragraph 003 Reference ID: 2a-003-20190220, an alternative approach to establishing the District's housing need is warranted.

Comment 1. MCHLG 'Guidance: Housing and economic needs assessment, Guides councils in how to assess their housing needs' does not require the addition of a buffer to the Standard-Method-calculated minimum annual local housing need.

1.1 NPPF para. 67 requires a buffer to be added to the first five years of the plan for the purpose of identifying sufficient sites. It does not require that this buffered total be delivered, but is a means to ensure a better probability that the required housing need is delivered from the enhanced number of sites.

1.2 In addition, NPPF para.73 indicates that the buffer is moved forward from later years in the plan period, confirming that the housing need total is not increased by the buffer, but is a pulling forward of sites.

1.3 The buffer is to ensure that there are sufficient sites available to deliver the first five years of housing need; it is not to require that houses in addition to the need are delivered. It should not be confused with the buffer required for five year housing land supply.

1.4 Neither the NPPF nor the Guidance require the addition of a buffer, 5% or otherwise, to Standard Method calculated 'minimum annual local housing need'. Accordingly, Horsham District's minimum local housing need, amounting to 17,310 (965 x 18) homes over the plan period should not be increased by a buffer.

2. The Standard Method, paragraph 003 Reference ID: 2a-003-20190220, advises that the use of the standard method for strategic policy making purposes is NOT mandatory, "if it is felt that circumstances warrant an alternative approach". This advice is caveated with the statement that "There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances" (MCHLG 'Guidance: Housing and economic needs assessment, Guides councils in how to assess their housing needs'). **Our country is experiencing exceptional unprecedented circumstances.**

2.1 It is recognised at paragraph 6.16, that "the Council does not have any direct control over housing delivery rates", and that there is "no guarantee that there will not be issues outside our control (such as a national economic downturn) which would limit the delivery of homes".

2.2 A UK and global down turn was in prospect before the advent of Covid-19, which is spreading at an exponential rate, threatening a recession more severe than the financial crisis in 2008-09. How long the resulting impact will last is uncertain.

2.3 Office for National Statistics – Subnational Population Projections show a substantial decline for the decade from 2018, relative to those published 2012, 2014 and 2016:

3. An alternative approach to establishing the District's housing need is warranted, and the open-ended off-loading of other authorities unmet need should be resisted.

Proposed Change -Remove the buffer.

-As is permitted by The Standard Method, Guidance paragraph 003 Reference ID: 2a-003-20190220, adopt an alternative approach to

establishing its housing need: the retention of the existing HDPF target.

-In collaboration with other local authorities HDC should seek the suspension of inflexible 5 year housing requirements, and the Housing Delivery Test.

Attachments



[CPRE Sussex objection policy14](#)

[HousingProvisionHousingNumberOptions.pdf](#)