



Campaign to Protect  
Rural England, Sussex Branch CIO  
Brownings Farm, Blackboys,  
East Sussex, TN22 5HG  
**Tel** 01825 890975  
**e-mail** info@cpresussex.org.uk  
www.cpresussex.org.uk

Horsham District Local Plan 2019-36  
Public Consultation (Regulation 18)

CPRE Sussex response, objecting to:

## **POLICY 14 – HOUSING PROVISION: Housing Number Options**

**Which of the housing options above do you think the Council should set as our housing number?"**

CPRE Sussex disagrees with each of the Housing Number Options given in the table at paragraph 6.14, for the reasons explained below.

1. We disagree with HDC's understanding that it must add a 5% buffer to the 965 homes per year Standard-Method-calculated minimum annual local housing need.

1.1 Neither the NPPF nor the Guidance require the addition of a buffer, 5% or otherwise, to Standard Method calculated 'minimum annual local housing need'.

1.2 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.

1.3 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.

1.4 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.

1.5 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.

1.6 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. According to the Table, page 52, paragraph 6.14, the district's minimum annual local housing need of 965 houses per year, plus the 5% buffer (48.25 houses per year), totals 1,000

per year. This is incorrect because  $965 + 48.25 = 1,013.25$  houses per year. However, as detailed above, the required buffer for the first five years of the plan refers to available sites and is not an increase to the housing need. Therefore, the district's minimum annual local housing need remains at 965 houses per year.

3. The third 'option' in the Table at page 52 includes an unmet housing need of 'around 400 house per year'.

3.1 However, paragraphs 6.8 and 6.9 indicate that under the Duty to Cooperate, the 'unmet housing need' of other local planning authorities, allocated to/accepted by HDC might well be considerably more than "around 400 homes each year". This has huge ramifications for Horsham District. Clarification is needed and until this is available, any subsequent analysis based on housing need is meaningless and should not be undertaken.

4. At paragraph 6.14, it is stated that "Horsham District has an objectively assessed 'local housing need' of 965 homes per year". This is potentially misleading as the Objectively Assessed Need (OAN) was superseded by the Standard Method in 2018. Therefore, the sentence in paragraph 6.14 should read "Horsham District's minimum annual local housing need is 965 homes per year".

**If you think the number should be different to the above what level of growth do you think we should provide. What evidence do you have for this?**

1. It is CPRE Sussex's view that given present unprecedented circumstance and resultant uncertainties around the economy and future growth, in consequence of the Covid-19 pandemic, it would be sensible for the Council to resist the offloading of houses from other local authorities, and to retain the existing target of 800 houses per year for the time being.

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.**

3. 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.

4. Office for National Statistics – Subnational Population Projections show a substantial decline for the decade from 2018, relative to those published 2012, 2014 and 2016:  
[Office for National Statistics – Subnational population projections](#)

**What do you consider to be the challenges to this Council in bringing forward the increase in housing development to meet the Government's unprecedented change in housing growth?**

1. CPRE Sussex asks that because of present exceptional and unprecedented circumstance caused by Covid-19, and resultant future uncertainties, the Council resist the offloading of houses from other local authorities, and press for the retention of the existing target (800 houses pa) as an interim measure, for the reasons explained below.

2. A major challenge to this council is and will continue to be the reality, 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”.

2.1. 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 At paragraph 6.16, it is stated that because the Council does not have direct control over housing delivery rates it will be necessary “to consider whether there will be sufficient market demand for very significant levels of housing delivery either in the district as a whole, or in / around particular villages and towns”.

2.4 The Council acknowledges at paragraph 6.15 that the level of housing ‘growth’ for the district is unprecedented. Accordingly, given present unprecedented circumstance and resultant uncertainties it would be sensible for the Council to resist the offloading of houses from other local authorities, and press for the retention of the existing target for the time being, as an interim measure.

2.5 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.**

2.6 CPRE Sussex therefore asks that because of present exceptional and unprecedented circumstance and resultant future uncertainties the Council resist the offloading of houses from other local authorities, and press for the retention of the existing target (800 houses pa), as an interim measure.

Dr R F Smith

For and on behalf of CPRE Sussex

26 March 2019