

Crest Nicholson Strategic Land and Planning

Horsham Local Plan Examination

Hearing Statement (Matter 2: Housing Supply and Headroom)

Date of report: April 2026

Response ID: 1197217

PREPARED FOR



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Matter 2: Housing Supply and Headroom

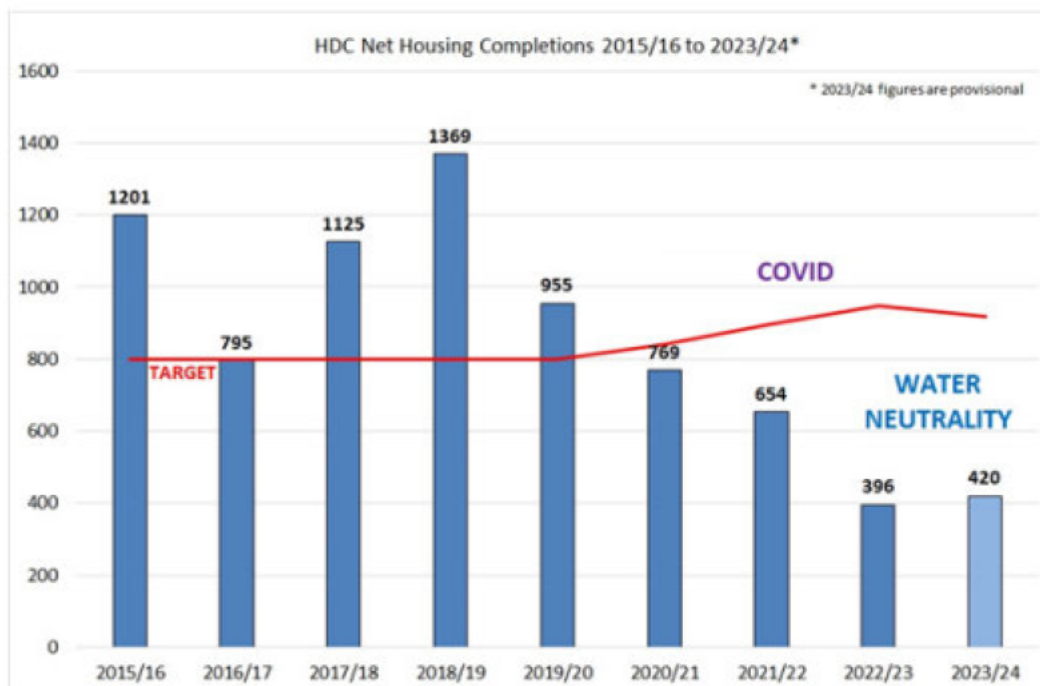
- 1.1 This Hearing Statement is submitted by Savills Planning on behalf of Crest Nicholson Strategic Land and Planning (herein after ‘Crest’) in relation to its land interest at Land West of Kilnwood Vale in response Matter 2 (Housing Supply and Headroom). The statement expands upon Crest’s Regulation 19 representations and Hearing Statements submitted for the Examination in Public Hearings in December 2024.
- 1.2 In accordance with the Inspectors Guidance Notes (IDJB02) this Statement responds to the matters identified in the Draft Hearings Agenda (IDJB03 v2). Each issue is covered in turn below.
- a. The housing supply trajectory as proposed.**
- 1.3 Crest do not wish to provide comment on Matter 2, Issue (a).
- b. The reliability of housing delivery assumptions / allowance for non-delivery**
- 1.4 Crest do not wish to provide comment on Matter 2, Issue (b).
- c. The reliability of assumptions about windfalls**
- 1.5 Crest do not wish to provide comment on Matter 2, Issue (c).
- d. The robustness of the trajectory**
- 1.6 Please see response to Matter 2, Issue (g).
- e. Maintaining adequate housing land supply including a rolling 5 year supply**
- 1.7 Please see response to Matter 2, Issue (g).
- f. Headroom, resilience and the mitigation of risk**
- 1.8 Please see response to Matter 2, Issue (g).
- g. Whether the housing requirement should be stepped**
- 1.9 HDC remain of the view that a stepped trajectory will be necessary, reflecting the legacy impact of water neutrality on the rate that development will come forward in the early years of the plan. HDC cite the reduction in permissions and the relative delay in determining applications and the resultant impact on the pipeline of permissions in comparison with what has historically been permitted.
- 1.10 The Council’s own analysis indicates that it takes a major development (10+ dwellings) on average 3.5 years from full permission to completion of the first dwelling , therefore the shortfall in completions will persist due to the reduction in permissions granted since September 2021.

Table 1: Proposed Indicative Stepped Trajectory

	Year 1	Year 2	Year 3	Years 4-7	Years 8-17
Requirement	452	320	470	734	1365
Comment	Completions	Completions	Forecast	x 4 years	x 10 years

- 1.11 To the Council's mind, the stepped trajectory will also reflect the fact that significant proportion of the homes in the submitted plan – and likely many homes of any new allocations – will come from sites that are strategic in scale and will therefore take several years to secure detailed planning permission and begin delivering.
- 1.12 Crest do not dispute that large outline consents often have a long-lead in time and some acknowledgement of this would be appropriate within the Council's trajectory. However, a blanket application of this 3.5 year period to all major applications (10+ units) is reductive and serves to oversimplify the huge variance seen across different site sizes and development typologies.
- 1.13 It is acknowledged that Natural England's (NE) moratorium had a hugely damaging impact on the District's housing land supply. However, the withdrawal of the Position Statement in October 2025 allows HDC to issue implementable planning consents, unhindered by Grampian water neutrality conditions and allows for those applications [previously issued with water neutrality conditions to seek their removal.
- 1.14 For example, on the Kilnwood Vale Strategic Development, Crest Nicholson successfully secured S73 consents on 3 no. Reserved Matters Consents to remove the Water neutrality conditions following the withdrawal of the Position Statement., effectively, freeing up the delivery of **460 dwellings** in the immediate term.
- 1.15 Crest have a further 722 units on Kilnwood Vale that are the subject of live Reserved Matters Applications, alongside a full planning application for a further 115 dwellings in the latter stages of S106 negotiations. Collectively, Kilnwood Vale alone could deliver **1,182 homes** in the coming years.
- 1.16 Prior to Water Neutrality HDC had a strong record of historic housing delivery. Since the adoption of the Horsham District Planning Framework (HDPF) housing delivery rates in Horsham District were consistently higher than the identified target between 2015/16 and 2019/20 (see Fig. 1). The Council regularly exceeded Housing Delivery Test targets.

Figure 1: Historic Net Housing Completions (taken from HDC Housing Delivery Test April 2025)



- 1.17 It can be seen from Figure 1 that where Horsham are not impeded by Covid and Water Neutrality, delivery rates within the District are very strong. Crest would implore HDC to plan positively for growth in the District and seek to match their previous delivery rates.
- 1.18 Delivery in line with the stepped trajectory over the first 7 years of the plan would lead to a cumulative shortfall of 2,192 dwellings against the District’s Objectively Assessed Need (910 dpa) – see Table 2.

Table 2: Cumulative Undersupply (First 7 years of HDLP)

Year	1	2	3	4	5	6	7
HDC Stepped Trajectory	452	320	470	734	734	734	734
Objectively Assessed Need	910	910	910	910	910	910	910
Annual Difference	-458	-590	-440	-176	-176	-176	-176
Cumulative Difference	-458	-1048	-1488	-1664	-1840	-2016	-2192

- 1.19 It can be seen that HDC are giving themselves a mountain to climb in the latter stages of the Local Plan. The Council’s Housing Trajectory assumes that this deficit will be compensated by Strategic Scale allocations in the second phase of the Local Plan.
- 1.20 The inclusion of a stepped trajectory risks rendering the plan unsound, as it is not positively prepared, nor consistent with national policy. The remedy would be to spread the LHN (which itself should be higher as explained in response to Matter 1) evenly over the plan period.
- 1.21 Indeed, as detailed in the Housing Topic Paper (Paragraph 22), there are 3,558 units in the Council’s trajectory with full planning permission. Delivery on these consented sites should be prioritised and incentivised to bolster housing completions in the first half of the plan.
- 1.22 It is noteworthy that in respect to the Wiltshire Local Plan the Inspector’s noted the following

*“Turning to the proposal to include a stepped housing requirement in the Plan as submitted, we consider that it is **neither positively prepared nor justified**. Whilst we note that the HRA indicates that a stepped trajectory should be considered, no clear evidence has been provided to justify at what level the step might be set at or its duration. Furthermore, the level of the step does not appear to have been subject to SA. Evidence was also provided during the hearings that the step was lower than current rates of housing delivery in the County. We are therefore concerned that it is not justified and would **serve to unnecessarily delay meeting identified housing needs**. In reaching this view, we note that there has not been a significant change in the level of the proposed housing requirement in the Plan when annualised and compared with the Wiltshire Core Strategy (document DP/01). Moreover, the housing trajectory provided in the submitted Plan does not seemingly correspond with a reliance upon strategic sites that would have phased delivery, nor is a majority of housing to be delivered later in the Plan period.”*

[Post Stage 2 hearings letter dated 22 December 2025 – Savills emphasis]

Soundness implications:

- ❖ **Positively Prepared** – Plans should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs
- ❖ **Justified** – The justification (based largely on Water Neutrality) is unjustified

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

- 1.23 The Council recognises that it will need to consider allocating additional sites in order to seek to:
- Meet its own housing need in full
 - Meet the unmet need arising from neighbouring authorities, and
 - Provide a level of “headroom” to ensure the plan’s supply of housing will meet the housing requirement over the lifetime of the plan and that a five-year housing land supply will be maintained.
- 1.24 The Council intends to test three broad options for growth, based on both the allocation of additional smaller sites (to help boost supply in the short to medium term) and the consideration of additional strategic sites to help increase supply from the mid to longer term (see Table 3).
- 1.25 Crest would strongly encourage HDC to consider the Medium and High Growth Options with a greater spread of small to medium size sites deliverable in the short to medium term.
- 1.26 As shown in table 3, the Low Growth Option does not provide for any element of headroom (-28 units). Crest strongly recommend that a buffer should be included due to the implications of non-implementation on housing delivery. Savills Research confirm that approximately 25% of planning consents granted nationally over the past 10 years have not been implemented, therefore including a buffer of a **minimum of 10%** would help to ensure that identified housing need is actually delivered. The threat of non-delivery under the HDLP as drafted is significant as HDC are reliant on a small number of larger strategic sites earmarked for the latter stages of the plan period.

Table 3: HDC Housing requirement and growth options

Plan Period	2023-2040
HDC Housing Need (less SDNPA) - Annual	1 yr at 890 1 yr at 896 15 yrs at 819
HDC Housing Need - Plan Period	14,071
Unmet Need Contribution - Plan Period	3,757
Housing Requirement	17,828
Low growth option	17,800
Headroom	-28
Headroom %	0%
Medium growth option	19,300
Headroom	1,472
Headroom %	8%
High growth option	20,100
Headroom	2,272
Headroom %	13%

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