

**Crest Nicholson Strategic Land & Planning and
Bellway Homes Limited (Southern Counties)**

Local Plan Examination

Matter 3 Homes To Meet The Needs of All The Community | Hearing Statement

Date of report: 10th April 2026

Representor Number: 1194442

PREPARED FOR



Matter 3: Homes To Meet The Needs Of All The Community

Inspector's Key Considerations for Matter 3

- a. The identified level of affordable housing need*
- b. Whether the proportion of affordable housing sought from each site is appropriate*
- c. Whether the mix of homes is appropriate*
- d. The plan's approach towards self-build and custom housing*
- e. The plan's approach towards homes for older people*
- f. Accessibility policy*
- g. Provision for gypsies, travellers and travelling showpeople*

- 1.1 This statement is submitted by Savills Planning on behalf of Crest Nicholson Strategic Land & Planning (herein referred to as 'Crest') and Bellway Homes Limited (Southern Counties) (herein referred to as 'Bellway') in relation to their land interest Land East of Billingshurst which is a draft strategic allocation (draft Policy HA4). This statement is in response to Matter 3 (Homes to meet the needs of all the community) and focuses on criteria a-f listed above. No comments are made in respect of criteria g. The statement expands upon previous representations submitted by Savills, on behalf of Bellway and Crest, including the Regulation 19 representations in March 2024 and the previous Matter 8 Hearing Statement submitted to Horsham District Council (HDC) in November 2024.
- 1.2 Since it was confirmed in February that an initial set of Hearing Sessions will proceed for HDC's Local Plan under the new examining Inspector Jonathan Bore, Topic Papers and evidence base documents have been made available by HDC. Those of the most relevance to Matter 3 are listed below and have been reviewed by Savills to inform this Statement:
 - Matter 3 Housing Needs Topic Paper (v2) (HDCJB07)
 - West Sussex County Council Extra Care Housing Market Position Statement – Future need for extra care (HDCJB07)
 - West Sussex County Council Extra Care Housing Market Position Statement – Older people's bed-cased care
 - Viability Assessment (H12) (November 2023) and Viability Assessment Addendum (HDC15) (November 2024)
- 1.3 It is important to recognise that the emerging Local Plan is to be examined under the 2023 National Planning Policy Framework (NPPF) however, the Local Plan will be implemented under the draft NPPF (2025) once this is formal national policy later in 2026.
- 1.4 Bellway and Crest's Matter 2 Statement provides a general comment and introduction to Allocation HA4 and also the relevance of the emerging NPPF (2025).

1.5 The comments below are directed specifically to Matter 3 and seek to ensure that the housing needs across the District are accurately represented and that the relevant policies within the emerging Local Plan are effective, flexible and deliverable, consistent with national policy.

a. The identified level of affordable housing need

1.6 Bellway and Crest recognise the conclusions in the Matter 3 Topic Paper that affordable housing need in Horsham remains high. There is a net affordable housing need of 554dpa, equating to 61% of Local Housing Need of 911dpa (applicable to the emerging Local Plan) and the pressure on demand for affordable housing is evidenced by the latest housing register figures (755 households in March 2026) and acute shortages of larger affordable homes. Bellway and Crest remain supportive of emerging Policy 38 (Housing Need) and Policy 39 (Affordable Housing) noting the flexibility offered on housing mix in affordable homes provision.

1.7 However, both the Council's Strategic Housing Market Assessment (SHMA) (2019) and Social Rented Housing and First Homes Study (SRFHS) (2022) are out of date now. Therefore they pre-date significant economic and cost related changes that are in place today and have a direct knock on effect for the types of homes being delivered.

1.8 To support the delivery of affordable housing in respect of the strategic allocations, it is considered that having CIL zero rated for the allocations would strengthen the ability to deliver affordable housing in line with policy. Therefore, it is advised that HDC's new CIL Charging Schedule is prepared promptly to align with the emerging Local Plan.

1.9 In addition, Bellway and Crest's Regulation 19 representations cited concern with emerging policies SP6-8 related to Climate Change and SP17 Biodiversity Net Gain, these additional requirements, above national standards / policy may have viability implications – which might impact on the proportion of affordable housing (noting that for the time-being at least, CIL is fixed). The focus on achieving 35% affordable housing should be considered in judging the robustness of other policies – notably in light of emerging NPPF (2025).

1.10 Overall, affordable housing need is clearly demonstrated however, delivery expectations need to remain realistic over the Local Plan period.

b. Whether the proportion of affordable housing sought from each site is appropriate

1.11 Bellway and Crest are supportive of the 35% affordable housing requirement for the strategic allocations and the fact that it is differentiated from the requirement for non-strategic greenfield sites (45%) – which is not supported, but which is also not relevant re: Allocation HA4. This is important for strategic sites which are subject to significant upfront infrastructure costs, longer build-out periods and as a result of this can be exposed to market fluctuations. HDC's viability testing also confirms that the strategic sites can deliver 35% affordable housing – though as a note of caution, it is not considered that this study sufficiently accounted for other infrastructure costs and financial contributions that the emerging strategic allocations are required to make, in line with their present emerging policy requirements (i.e. emerging policies SP6-8 and SP17). Furthermore, the Council's evidence base to inform affordable housing requirements does not account for Build Cost Inflation, Housing Standards Review and Building Safety Levy which adds an additional costs for both PDL and greenfield sites. Hence – flexibility in the application of the affordable housing requirement is likely to be essential.

1.12 It is crucial that the policies in the emerging Local Plan enable viability review mechanisms, allow for tenure rebalancing, particularly where social rented provision impacts delivery and avoid 'front-loading'

affordable housing requirements that could impact the early phases of delivery on the strategic allocations.

- 1.13 Overall, the strategic affordable housing targets are broadly sound however, their effectiveness depends on a degree of flexibility and ongoing viability testing.

c. Whether the mix of homes is appropriate

- 1.14 As set out above, the Council's SHMA (2019) is significantly out of date and therefore further studies are required to ensure housing mix is accurately reflective of the latest market needs across the District. This is particularly relevant for the market housing which should be led by the market. Emerging Strategic Policy 38 does partially allow for appropriate site-specific variation on the basis of character, density, viability and local evidence, which is effective and welcome.
- 1.15 However, a more robust approach would be to make clear that the broad housing mix in Table 9 of the emerging Local Plan is indicative, and a broad target. In addition, to be justified, consideration should be given to any relevant updates to the table, to reflect any relevant updated evidence. As evidence base, a SHMA should be regularly reviewed.
- 1.16 It is therefore considered that the Council could further amend the emerging policy, or supporting text, to make clear that housing mix targets are guidance as opposed to rigid quotas and that market absorption and changing household formation are material considerations for the strategic allocations coming forward. This would assist with generating value from development, to ensure, for example, infrastructure is provided, and the 35% affordable housing target is achievable.

d. The plan's approach towards self-build and custom housing

- 1.17 Bellway and Crest support the proportionate and demand led approach for self-build and custom housing that has been adopted by the Council. As set out in the Matter 3 Topic Paper, evidence shows that there are declining annual registrations alongside a strong recent supply (85 plots permitted since 2015).
- 1.18 The emerging strategic allocations, including Land East of Billingshurst, are well placed to deliver some serviced plots within the later phases and respond to up-to-date demand at the planning application stage. Though, a proportionate approach is required – as there are pressing (arguably more pressing) needs for market and affordable homes. This is confirmed as the self / custom build register shows that there are only 178 entries on the register, of which only 127 are HDC residents – which needs to be considered in context.
- 1.19 It is considered that the Inspector should confirm that no fixed percentage is required and flexibility remains to respond to register trends over time.

e. The plan's approach towards homes for older people

- 1.20 Bellway and Crest have outlined concerns in the Regulation 19 representations that Allocation HA4 is for C3 and C2 (approximately 650 dwellings). C2 uses are not promoted, though a proportion of C3 dwellings would be adaptable for older persons.
- 1.21 As set out in the Matter 3 Topic Paper, evidence does support increased provision for older persons with 610 units of sheltered/retirement housing needed and 563 extra-care units required over 2021-2038. Though, in the context of the plan period overall all, it remains a small proportion (5-8%).
- 1.22 The emerging strategic allocations offer the ability to make a contribution to this need as well as integration with services, open space and public transport which aligns with West Sussex County

Council's (WSCC) priority to shift away from institutional care settings. Though, the sound approach would be to make specific allocations for C2 uses.

- 1.23 As a separate issue, and assuming reference to C2 remains in allocation policies, such as HA4, in respect of viability, the Council's viability evidence does confirm that extra-care housing cannot viably support affordable housing requirements in most cases. Thus there are concerns that emerging Policy 42 (Retirement Housing and Specialist Care) should not be required to comply with emerging Policy 39 (Affordable Housing) as currently worded.
- 1.24 Overall, noting this is an issue which will be discussed later in the Examination Hearings (re: Allocation HA4) Bellway and Crest would like reference to C2 removed from the policy – instead the emphasis should be on a proportion of the C3 homes being adaptable or available for older persons.

f. Accessibility policy

- 1.25 Bellway and Crest recognise the requirement for M4(2) as the baseline standard with 5% M4(3) on sites of 20+ dwellings where the evidence exists. The scale of the emerging strategic allocations allows for the efficient delivery of accessible homes and integrated layout planning.
- 1.26 Bellway and Crest also note that the new draft NPPF (2025) is proposing a national policy approach to M4(2) and M4(3) – policy HO5.

Conclusions

- 1.27 Overall, Bellway and Crest consider that the emerging Local Plan is broadly sound, justified and positively prepared in relation to housing needs. The emerging strategic allocations are essential to delivery and capable of accommodating a range of needs with access to local facilities and sustainable transport methods.
- 1.28 The soundness of the relevant policies within the emerging Local Plan depend on policy flexibility, viability realism, avoidance of overly rigid requirements at the application stage and up to date evidence such as the SHMA.

END

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