

FAO: Jonathan Bore

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By email: programmeofficer@horsham.gov.uk

Dear Inspector,

Matter 2 – Housing Supply and Headroom

CBRE is instructed by Wain Estates (**Respondent ID: 1192387**) in respect of their land interest at Kingsfold (Brookvale Garden Village). The site is assessed through the Council's evidence base as one of the alternative strategic sites and within the Draft Plan has the status of an omission site. The application is currently the subject of an EIA Scoping Request with Horsham District Council (HDC) (REF: EIA/24/0006).

Q2a. The housing supply trajectory as proposed

There are 3,260 dwellings proposed to be delivered across the strategic site allocations in the submission local plan which will come forward before 2040.

The two most significant contributors to this are the Land West of Ifield (1,600) and Land Northwest of Southwater. Both of these schemes are the subject of live planning applications having been validated in August 2025 and March 2026 respectively.

Work undertaken by Lichfields¹ has indicated that on average it takes 6.6 years from validation for schemes of 1,000 units or more to deliver their first unit. Such delivery timescales can be paralleled to the North Horsham development in Horsham. This was validated in August 2016 and, as of March 2026, has completed 211 of the units (8%). Whilst for a few years this would have been protracted by the District Wide Water Neutrality issues it does indicate a circa 6-7 year period to first occupation.

Against the evidence (both at the micro level and macro level) we would suggest that completions before 2030/2031 for Land West of Ifield and Land Northwest of Southwater would seem ambitious and should be updated accordingly. This is highlighted below.

¹ https://lichfields.uk/media/w3wjmw0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf



PROPOSED STRATEGIC ALLOCATIONS

Submission Local Plan Draft Strategic Allocations

B	Land West of Mild	1500	1,500							80	100	140	160	150	150	150	150	150	150	150
B	Land West of Southwater	1,044	950							40	70	80	100	100	100	100	100	100	100	60
B	Land East of Billingshurst	650	650										55	70	75	90	90	90	90	90
B	Land North of Horsham - intensification	50	50																	60
Submission Local Plan Draft Strategic Allocations Total		3,354	3,260	0	0	0	0	0	0	120	170	220	315	330	335	350	350	350	350	370

Q2b. The reliability of housing delivery assumptions/ allowance for non-delivery.

From the Council's Topic Paper (**HDCJB05**) it is unclear if or how a lapse rate/non-delivery rate has been applied to the assumptions that the Council is making. Paragraph 14 of the document refers to inputs having been "sense checked" but it is unclear what is meant by this and whether or not it means that a lapse rate has been applied to individual sites?

Paragraph 16 of the same document states:

"Historically, Horsham District Council (and other West Sussex authorities) have used a completion co-efficient rate from West Sussex County Council (WSCC) to estimate the percentage of HDC planning permissions of between 1 and 4 dwellings that are completed. Historically this figure has been in the region of 60% i.e. of all applications for 1-4 dwellings that are granted planning permission by HDC, about 60% are completed, while 40%, for a number of different reasons, are not completed."

Whilst the point that not all permissions are built is referenced there is no obvious application for how this is reflected in the robustness of the housing trajectory. To be deliverable and developable there needs to be a realistic and reasonable prospect around the assumptions. Given the evidence from Horsham at Paragraph 16 a non-delivery rate should be applied to ensure that the proposed supply is not artificially inflated.

Assuming that Horsham have not applied any discount in light of the evidence the trajectory will need to be updated to include a non-implementation rate to ensure that the proposed trajectory remains justified.

Q2c. The reliability of the assumptions about windfall.

We have no specific comments to make in respect to Q2c save for those points made above in respect to Q2a and Q2b which inevitably overlap.

Q2d. The robustness of the trajectory.

We have no specific comments to make in respect to Q2d save for those points made above in respect to Q2a and Q2b which inevitably overlap.

Q2e. Maintaining adequate housing land supply include a rolling 5 year supply.

We have no specific comments to make in respect to Q2e.

Q2f. Headroom, resilience and the mitigation of risk.

If our understanding of the approach to non-implementation is correct it will be important for soundness to ensure that there is appropriate contingency in the housing supply to ensure that any non-implementation does not result in the plan delivering below the objectively assessed need for the area.

Q2g. Whether the housing requirement should be stepped.

We fully agree with the Council that, in light of the issues created by Water Neutrality, there are sound reasons for a stepped trajectory. The proposed approach will require the identification of additional strategic sites to seek to meet this need that arises in the back-end of the plan period. Brookvale Garden Village is well placed to respond to this need.

The PPG is clear on the circumstances in which a stepped trajectory should be used. As stated:

“A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.”

It is clear that the approach and level of the stepping is a pragmatic response to the issues faced by Horsham.

Q2g. Whether additional housing allocations are required, and if so, what kind/size/timing.

As set out in Paragraph 32 of the Council’s Topic Paper (HDCJB05) it is encouraging that work to assess sites and potential developing scenarios is proceeding at pace. We agree with the Council that in respect of the nature/scale will be varied but given the scale of the shortfall that exists, a large strategic site in the control of a sole promoter would give deliverability reassurance. Without specific reference to omission sites, the Council has assessed and collated evidence on a number of strategic sites during the previous consultation periods for the emerging local plan and these represent an obvious starting point in looking at finding additional units.

In broad terms, given that a figure of 3,757 of the overall housing need comes from the unmet need of Crawley, it makes sense that this need would spatially be located as close to the area in which the need is originating as possible (i.e. to the North of Horsham). As set out in previous submissions, there are also economic and spatial benefits in concentrating housing development within the core of the Gatwick Diamin. This is not set out in detail for the purpose of Q2g but will be elaborated upon in future session.

Yours Sincerely,

Adam Kindred

SENIOR DIRECTOR
CBRE LIMITED ON BEHALF OF WAIN ESTATES LIMITED