

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

Hearing Statement

Matter 5a: The Spatial Strategy and Site Selection

Date of report: September 2026

Representor Number: 1194442

PREPARED FOR



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Document History

Issue	Date	Issued by	Comment
1.0	18/09/2026	HK	Draft
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1. Introduction

- 1.1 This Statement has been prepared by Savills, on behalf of Bellway Homes Limited (Southern Counties (herein referred to as 'Bellway') and Crest Nicholson Strategic Land & Planning (herein referred to as 'Crest'), in response to **Matter 5a concerning The Spatial Strategy and Site Selection**. It draws upon the evidence submitted throughout the Local Plan process, including the Regulation 19 representations, supporting technical evidence, previous Hearing Statements and responses to the Main Modifications consultation.
- 1.2 The purpose of this Statement is not to revisit detailed site-specific matters, which are addressed elsewhere in the Examination process, but rather to consider whether the Local Plan's overall approach to the distribution of development and selection of strategic allocations represents a justified, effective and sustainable strategy consistent with national policy. Bellway and Crest's specific interests are the northern parcel of Strategic Policy HA4.
- 1.3 Bellway and Crest broadly support the Council's decision to focus growth within the District's most sustainable settlements and consider that the allocation strategy provides an appropriate response to the District's development needs. In particular, the strategy recognises the importance of directing growth towards settlements that can accommodate development whilst supporting existing services, infrastructure and public transport networks. The spatial strategy, factoring in the proposed supply of over 20,000 new homes, is now a sound strategy, as per the National Planning Policy Framework (NPPF) (2023).

2. Spatial Distribution

Housing Need

- 2.1 The evidence base demonstrates that Horsham has significant housing needs which must be addressed through the Local Plan. The District also forms part of a wider housing market area where housing pressures remain substantial. The Local Plan therefore needs to maximise opportunities to deliver sustainable development in locations capable of accommodating growth.
- 2.2 In this context, the Council's strategy of allocating a number of larger strategic sites alongside a range of smaller allocations is appropriate. Large strategic allocations are capable of making a meaningful contribution towards housing delivery, affordable housing provision and infrastructure investment. They also provide greater certainty of delivery over the plan period.
- 2.3 Based on present evidence of need and up to date policy, there is arguably a requirement to plan for further development over the long term. This is being addressed as the next Local Plan is already being produced. It is in the interests of sustainable development for the emerging Local Plan to be adopted as soon as possible. The spatial strategy, factoring in the proposed supply of over 20,000 new homes, is now a sound strategy, as per the NPPF (2023).

Settlement Hierarchy

- 2.4 The Local Plan identifies Billingshurst as a second-tier settlement within the District's hierarchy and a key location for future growth. The settlement benefits from a substantial range of services and facilities, together with strategic transport connectivity. Bellway and Crest support the conclusions of HDC's Sustainability Appraisal (SA) Addendum.
- 2.5 The Strategic Polic HA4 allocation directly accords with the settlement hierarchy because it focuses growth in a settlement capable of supporting additional development. The site adjoins the existing built-up area boundary on the western and northern sides and therefore represents a natural extension to the settlement rather than isolated or sporadic countryside development.
- 2.6 The site is enclosed by strong physical boundaries including existing residential development, the railway line, the A272, established vegetation and hedgerow corridors. These features provide clear containment and create a logical extent for future growth. Importantly, development east of Billingshurst builds upon recent growth delivered at Amblehurst Green and represents the continuation of an established pattern of settlement expansion.
- 2.7 Unlike alternative greenfield options around the District, HA4 integrates directly with an existing service centre and therefore reinforces rather than undermines the settlement hierarchy.

Access to Employment, Community Facilities and Reducing the Need to Travel

- 2.8 Billingshurst performs an important service centre function and already contains:
- Primary and secondary schools.
 - Healthcare facilities.
 - Retail services.
 - Community facilities.
 - Employment areas.

- Rail services.

- 2.9 The Site is immediately adjacent to Rosier Business Park, identified as a Key Employment Area within the emerging Local Plan. This provides existing employment opportunities within walking and cycling distance of future residents.
- 2.10 Strategic allocations can also help secure the delivery of new facilities alongside development. This approach allows growth not only to support existing services but also to enhance them. The ability of larger sites to deliver schools, open space, community facilities and employment opportunities represents a significant advantage when compared with smaller isolated sites which may have less capacity to contribute towards wider place-making objectives.

Highway Network

- 2.11 No growth strategy can avoid generating additional travel demand. The key issue is therefore whether development is directed towards locations where impacts can be appropriately managed and mitigated.
- 2.12 The allocated sites are generally focused around settlements with existing road infrastructure and opportunities for improvements through planning obligations and investment. As such, the strategy avoids directing substantial growth towards locations where transport impacts would be inherently difficult to resolve.
- 2.13 The Local Plan is clearly supported by updated transport evidence including the preferred growth scenario and its cumulative effects.

Rail Connectivity

- 2.14 The Council's approach of directing a proportion of growth towards settlements served by rail infrastructure is fully justified. Such locations provide opportunities for sustainable commuting patterns and help support wider climate change objectives.
- 2.15 Billingshurst Railway Station has frequent services to London Victoria, Horsham, Crawley, East Croydon and across the wider network. Land East of Billingshurst (Strategic Policy HA4) is approximately 200m from the Station at its nearest point. Few strategic allocations within Horsham District can demonstrate such close proximity to a railway station.

3. Constraints

Landscape and Countryside

- 3.1 The evidence base demonstrates that the Council has undertaken a comprehensive assessment of landscape impacts and has selected sites capable of accommodating development with appropriate mitigation.

Heritage Assets

- 3.2 The evidence indicates that heritage considerations have formed part of the site selection process and that allocations have been selected on the basis that any impacts can be appropriately mitigated through design, layout and masterplanning.
- 3.3 National policy does not require all change to be avoided. Rather, it requires a balanced assessment of harm and public benefits.

Habitats and Biodiversity

- 3.4 The Council has undertaken extensive ecological assessments through its Habitats Regulations Assessment and supporting evidence base.
- 3.5 The Local Plan Examination should recognise that biodiversity considerations are now addressed through a significantly strengthened national policy and legislative framework, including Biodiversity Net Gain requirements.
- 3.6 The ability to secure meaningful environmental improvements forms an important benefit of larger strategic sites within the plan-led strategy.

Water and Wastewater Infrastructure

- 3.7 Bellway and Crest have consistently highlighted that water supply issues should be addressed through the statutory responsibilities of Southern Water, the Environment Agency and associated regulatory mechanisms.
- 3.8 HDC's Infrastructure Delivery Plan (IDP) confirms ongoing investment in wastewater infrastructure and no evidence demonstrates that utility constraints render the Strategic Allocation HA4 undeliverable.
- 3.9 The Main Modifications process has also provided greater confidence regarding the resolution of issues that previously constrained growth, including matters associated with water infrastructure and environmental mitigation.

4. Housing Delivery

Meeting Different Housing Needs

- 4.1 In respect of C2 provision, Bellway and Crest question the need for C2 provision to be allocated as part of Strategic Policy HA4. There is no explicitly stated quantum or even a range for provision of older persons homes, and therefore, no way of determining whether such a specific need is required to be delivered as part of the HA4 allocation. **At the planning application stage, a case can still be made for a 100% C3 development. For the Plan to be positively prepared and effective, care home provision should be expected to come forward across the district on sites which have been carefully considered by HDC to be appropriate to deliver care home provision.**

Deliverability and Timing

- 4.2 The Council's decision to allocate a number of large strategic sites alongside smaller allocations represents a balanced approach to delivery. Strategic sites can make significant contributions over the medium and long term, whilst smaller allocations and windfalls can assist in maintaining supply in the earlier years of the plan period.
- 4.3 As set out in Bellway and Crest's Matter 2 Hearing Statement (April 2026), on the basis of a start date of the emerging Local Plan of 1st April 2023, Land East of Billingshurst has been included in HDC's trajectory based on delivering residential units from 2032/33 (Y10) until 2039/40 Y17 and will provide at least 650 new residential units during the plan period (likely approximately 700 dwellings). These timeframes vary from those provided by Bellway and Crest to the Council in February 2026 which set out that delivery could potentially start as early as 2028/29 and hence make an earlier contribution to the Council's housing land supply if the emerging Local Plan proceeds, which both Bellway and Crest are supportive of. This contribution is critically important in improving housing supply performance and maintaining a deliverable trajectory throughout the plan period.
- 4.4 Notwithstanding this, the Council's more cautious trajectory is not unsound.
- 4.5 Importantly, the northern parcel promoted by Bellway and Crest can come forward independently of land south of the railway line. This further enhances delivery certainty and flexibility.

5. Conclusion

- 5.1 Bellway and Crest consider that the Council's overall spatial strategy represents an appropriate and sustainable response to the District's development needs. The strategy is positively prepared, justified and consistent with national policy.
- 5.2 The strategy:
- Directs growth towards sustainable settlements;
 - Supports the settlement hierarchy;
 - Makes effective use of existing services and infrastructure;
 - Takes account of environmental constraints;
 - Supports public transport and active travel objectives;
 - Provides opportunities for comprehensive infrastructure delivery; and
 - Includes a range of site sizes capable of delivering housing throughout the plan period.
- 5.3 Viewed in the round, the spatial strategy and site selection process are justified, effective and consistent with national policy, and therefore capable of being found sound at Examination.
- 5.4 From a spatial strategy perspective, Strategic Policy HA4 is precisely the type of sustainable growth location envisaged by national policy. It directs development to an accessible settlement with existing infrastructure, strong public transport connectivity and the capacity to accommodate growth in a planned and comprehensive manner.
- 5.5 Bellway and Crest therefore submit that the allocation of Land East of Billingshurst forms an essential component of a sound Local Plan and provides compelling evidence that the spatial strategy is justified, effective and consistent with national policy.

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