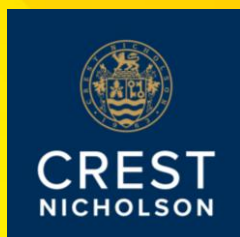


Crest Nicholson Plc

Hearing Statement Matter 5a

September 2026

On Behalf of:



savills

Contents

1.	Introduction.....	2
2.	Response to Inspectors Matters	3
	i. Spatial distribution: whether the plan's proposed distribution of development is an appropriate spatial response to:.....	3
	ii. Constraints: whether the distribution of development is sound having regard to: .	4
	iii. Housing delivery: whether the range of sizes and types of site would ensure that:	5
3.	Conclusion.....	7
	Contact	8

1. Introduction

- 1.1 This Hearing Statement has prepared by Savills, on behalf of Crest Nicholson Plc (hereafter referred to as 'Crest') in response to the Inspector's 'Matters, Issues and Questions' (07/09/2026) with specific regard to Matter 5a "The Spatial Strategy and Site Selection".
- 1.2 Crest sets out in its Regulation 19 representations that the Strategic Development Location (SDL) now known as Kilnwood Vale (KV) was allocated in 2009. Hybrid planning permission for the new neighbourhood was granted in October 2011. It now comprises a community with circa 1,400 homes built and/or occupied alongside a new primary school, parks, open spaces and transport infrastructure. KV is included in the settlement hierarchy within the draft Horsham District Local Plan (HDLP) as a 'Small town/Large village'.
- 1.3 Crest has actively and positively promoted 'Land West of Kilnwood Vale' (LWKV) for circa 10 years. Crest strongly welcomes Horsham District Council's (HDC) decision to allocate LWKV for approximately 350 dwellings under Main Modification MM235 of the emerging HDLP.
- 1.4 LWKV represents a sustainable, deliverable and well-related extension to the existing KV community and can make a meaningful contribution towards meeting housing needs within both Horsham, and Crawley.
- 1.5 Crest has already robustly responded to the evidence base that underpins the proposed spatial distribution of development across the District within its Regulation 19 Represent, so will seek to directly comment on the matters raised by the Inspector in this hearing statement.

2. Response to Inspector's Matters

i. Spatial distribution: whether the plan's proposed distribution of development is an appropriate spatial response to:

Housing need in the district and in adjacent districts

- 2.1 The Plan seeks to accommodate half of Crawley's unmet housing need to 2040 (3,757 dwellings). Paragraph 4.16 of the Draft Local Plan recognises that land around Crawley has been considered as a location for development, given the town's role in driving the wider sub-regional economy and providing employment opportunities.
- 2.2 The Council's evidence base supports this approach. The Housing Delivery Study identifies a "clear relationship" between the areas around Horsham and Crawley, specifically identifying Kilnwood Vale in this context (paragraph 4.26). This provides further support for the role of development in the Horsham area in helping to address Crawley's unmet housing need.
- 2.3 In this context, Crest agrees with Main Modification MM28, which updates the Plan to recognise that allocations can help deliver unmet housing needs close to where they have arisen, including Crawley.
- 2.4 Crest agrees that the Local Plan responds appropriately to housing need in the district and in adjacent districts.

The settlement hierarchy and settlement character

- 2.5 Kilnwood Vale is identified as the Tier 2 of the Settlement Hierarchy, under "Small Towns and Larger Villages". Crest supports the recognition of Kilnwood Vale as a Tier 2 settlement, as it sits squarely within the description as set out in Table 3 of the Draft Local Plan.
- 2.6 The allocation of Land West of Kilnwood Vale (MM235/Policy KV1) directly accords with the direction of development established through the settlement hierarchy. The site forms a logical extension to the existing Kilnwood Vale neighbourhood, which is identified within HDC's proposed settlement hierarchy as a sustainable location. The established community, together with existing and consented facilities, means that the allocation would build on an existing sustainable pattern of development rather than establishing a new settlement location.

Access to employment, social and community facilities and the objective of reducing the need to travel

- 2.7 HDC's assessment of LWKV (ref. SA291) notes that it is adjacent to Kilnwood Vale, which is now "well advanced", with approximately 1,318 homes delivered. It also notes that the Neighbourhood Centre (DC/23/1694), comprising retail uses, a community centre, a pub, elderly care units and 111 flats is due to commence in 2026. Crest confirms that this assessment remains accurate and that construction of the Neighbourhood Centre has now commenced.
- 2.8 LWKV will benefit from its proximity to these existing and emerging facilities. Crest has appointed transport consultants to exploring options for active travel connections such as cycle ways, bus routes and pedestrian links between KV and LWKV to ensure that future residents can readily access the Neighbourhood Centre, and the wider social and community infrastructure within KV, including primary school, parks and open spaces.

The highway network, rail network, public transport and active travel

- 2.9 These three aspects have been considered together, as Crest considers that the rail and highway network, together with wider public transport, are fundamental to delivering a holistic transport strategy to ensure that the spatial strategy responds appropriately to all modes and provides suitable mitigation.
- 2.10 In respect of LWKV, it is Crest's view that the proposed distribution of development represents an appropriate spatial response to rail, highway, public transport and active travel considerations. LWKV is well located to integrate with the existing transport network, being immediately adjacent to the A264, within a 15-minute walk of Faygate Station and within a five-minute walk of bus stops served by Metrobus, including the Fastway express service, which provides up to 10 buses per hour during peak periods. These connections provide access to Horsham, Crawley, Gatwick Airport and, via onward rail connections, London and further afield.
- 2.11 It should be noted that Network Rail considers that a railway station at Kilnwood Vale is no longer feasible, as any new stations on this section of the line will "*significantly compromise performance on the Thameslink network*"¹. However, Crest still considers that, combined with the social facilities provided within Kilnwood Vale and the active travel opportunities available within the site as well as a number of bus links, including frequent Fastway services, Kilnwood Vale remains well connected and represents a sustainable location for development.
- 2.12 The availability of these sustainable transport options to LWKV, alongside opportunities for active travel connections, will provide alternatives to private car travel and help reduce pressure on the highway network. The allocation of LWKV therefore represents a sustainable and integrated spatial response to the transport requirements of the proposed development.
- 2.13 Crest agrees that the spatial strategy across the district responds and mitigates the highway and rail network, public transport and active travel opportunities.

ii. Constraints: whether the distribution of development is sound having regard to:

Landscape and countryside

- 2.14 Regarding LWKV, the proposed distribution of development is sound having regard to landscape and countryside considerations, and its Landscape sensitivity has been assessed through the Council's evidence base. The Landscape Capacity Study (2021) identifies the area as having no/low capacity and recognises the potential impact on the setting of the High Weald National Landscape.
- 2.15 However, these constraints can be appropriately addressed through the detailed masterplanning and design of LWKV, including strategic planting, landscape buffers and measures to maintain separation between settlements.
- 2.16 It is also noted that HDC has included a 'Area of Search' for the CWMMC, which currently is shown as within the developable area of LWKV. Crest has objected to this current alignment but agrees with the principle of the CWMMC and has suggested that it be located to the west of the developable area with access onto the A264 safeguarded within the 'dog-leg' of the allocation. On this basis, the CWMMC alongside appropriate buffer planting will provide a permanent buffer to limit the possibility for coalescence between settlements.
- 2.17 Crest agrees with the Council's assessment within the Site Assessment Report Update (June 2026) that LWKV's role as an extension to the existing Kilnwood Vale allocation also provides an

¹ HDC's Infrastructure Delivery Plan 2026 (page 34)

opportunity to integrate development sensitively within the existing landscape and settlement pattern.

Heritage assets and their settings

- 2.18 Heritage matters have been considered in determining the suitability of the allocated sites. The evidence indicates that the allocations have been identified having regard to the potential heritage effects, with the expectation that any impacts can be addressed through the detailed design and masterplanning of development.

Habitats and biodiversity

- 2.19 The Council's ecological evidence base, including the Habitats Regulations Assessment, provides a detailed assessment of biodiversity considerations.
- 2.20 Biodiversity is now subject to a strengthened national policy and legislative framework, including mandatory Biodiversity Net Gain (BNG). The NPPF also now states at PM13, that relevant national standards should be adapted where appropriate.
- 2.21 Sites, including LWKV, will provide opportunities to secure wider, meaningful environmental enhancements as part of thier delivery.

Services including water and sewerage

- 2.22 Crest has consistently stated that water companies have a duty to supply water to persons who demand them under Section 37 of the Water Industry Act (WIA) 1991.
- 2.23 Section 37 of the WIA 1991 also requires water companies to prepare Water Resources Management Plans (WRMP) and that these must forecast a water company's supply and demand over at least the statutory minimum period of 25 years.
- 2.24 The Infrastructure Delivery Plan confirms ongoing investment in wastewater infrastructure, and Crest has an established relationship with the water companies following the build out of Kilnwood Vale.
- 2.25 It should also be noted that Thames Water has not raised an objection to LWKV; it has confirmed the automatic right to connect to the public sewer as per the WIA and encouraged the developer to discuss proposals early to allow it to undertake a review of the network and identify any upgrade, if required. Crest has a good working relationship with Thames Water following engagement on the KV site since 2019, and looks forward to continuing engage on LWKV.
- 2.26 Policy DM7 of the NPPF also states that decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively. As such, it is right to assume that those statutory undertakers responsible for water supply are fulfilling their statutory duties under the water regime.

iii. Housing delivery: whether the range of sizes and types of site would ensure that:

Different housing needs and aspirations would be adequately met

- 2.27 Crest welcomes HDCs ref. MM152 which sets out that 35% of affordable homes is targeted on non-strategic greenfield sites, taking into account the updated Local Plan Viability Assessment (June 2026). It concluded that an increase to 40% affordable would begin to change the outcomes of some typologies, and in turn bring into question whether the majority of unconsented land is viable.

- 2.28 Crest considers that 35% is a more realistic target over the plan period, subject to viability. Current market conditions are demonstrable of the difficulties in making schemes viable but this needs to be balanced against the need to target for the delivery of affordable homes to meet local housing needs.

Enough homes would come forward at the right time during the plan period to meet the housing requirement

- 2.29 Crest supports the HDC's decision to allocate a mix of large strategic sites and smaller sites, allowing a balanced approach to be provided to housing delivery across the plan period.
- 2.30 As Figure 1 of the Indicative Housing Trajectory (August 2026) shows, existing commitments underpin delivery in the early years (2023/24–2027/28), with smaller sites making a steady contribution from 2028/29 onwards.
- 2.31 This provides continued delivery while the larger strategic sites build towards their peak contribution from the early 2030s. The mix of site sizes and types also reduces reliance on any one site or delivery route and provides some resilience if individual strategic sites experience delays.

3. Conclusion

- 3.1 Crest considers that the Council's overall spatial strategy represents an appropriate and sustainable response to the District's development needs.
- 3.2 Crest supports HDCs spatial strategy, which seeks to provide for a balanced approach to growth, directing development towards sustainable locations, making best use of existing services and infrastructure, and responding to environmental constraints, while supporting public transport and active travel. It also recognises the benefits of a diverse mix of smaller allocations in addition to strategic allocations in improving deliverability and maintaining a continual housing supply.
- 3.3 Crest considers that LWKV fits this type of development exactly. LWKV benefits from a strong delivery trajectory and will benefit from existing social and green infrastructure within the wider KV neighbourhood, making it well placed to support the Council's objectives for sustainable growth. It also presents the opportunity to improve links to Faygate station to the west, which could improve accessibility for future residents of LWKV as well as the wider KV neighbourhood.
- 3.4 The removal of water neutrality constraints and the ongoing delivery of key infrastructure at Kilnwood Vale further strengthens the justification for the allocation and addresses previous concerns that resulted in LWKV being omitted from the January 2024 Regulation 19 Local Plan.
- 3.5 Crest therefore considers that the spatial strategy has the potential to be found sound, supported by the allocation of additional sites such as LWKV.

Contact

Sarah Beuden
Director

+44 (0) 23 8071 3961
+44 (0) 7812 965 308
sbeuden@savills.com

Becky Rayner
Senior Planner

+44 (0) 23 8071 3923
+44 (0) 7816 184 117
becky.rayner@savills.com

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

The Savills logo, consisting of the word "savills" in a lowercase, sans-serif font, with the 's' in a darker shade of red than the rest of the word. It is positioned within a light yellow rectangular box.