



To All Councillors,

You are summoned to an Extraordinary Meeting of Billingshurst Parish Council on **Wednesday 19 August 2026 at 6.30pm** at the Billingshurst Centre.

Members of the public are welcome to attend this meeting and speak for a maximum of three minutes about an item on the agenda for this meeting during the Public Session at the discretion of the Chairman. They must give their name.

AT THIS MEETING, IF ANY MEMBER OF THE PUBLIC WOULD LIKE TO SPEAK, PLEASE CONTACT THE CLERK IN ADVANCE TO RESERVE A 3-MINUTE SPEAKING SLOT.

G.C. Burt
Clerk to the Council

12 August 2026

Please note that all supporting papers can be found on the Councils' website.

A G E N D A

1. Chairman's Announcements.
2. Apologies for Absence.
3. To Receive Declarations of Interest and consider any requests for a dispensation.
4. Approval of the Minutes of the Meeting held on 1 July 2026. (Previously sent)

Adjournment for

5. Public Session (Members of the Public may speak for up to 3 minutes at the discretion of the Chairman). They must give their name.
6. To receive comments from Horsham District Cllrs for Billingshurst, Cllrs Mark Baynham and John Trollope on HDC's Proposed Modifications to the HD Draft Local Plan. (15 Mins + questions)

Resume Meeting

7. To consider making a response to Horsham District Council's Proposed Modifications to the HD Draft Local Plan. Suggested response, based on existing Parish Council position – attached Appendix A.
9. **Date of Next (Ordinary) Meeting – 2 September 2026**

Members of the public should be aware that being present at a meeting of the Council or one of its Committees or Sub-Committees will be deemed as the person having given consent to being recorded (photograph, film or audio recording) at the meeting, by any person present.

APPENDIX A

BILLINGSHURST PARISH COUNCIL

19 AUGUST 2026

PROPOSED MODIFICATIONS TO THE HORSHAM DISTRICT LOCAL PLAN

REPORT BY CLERK TO THE COUNCIL

FOR DECISION

Background

In Spring 2020, having taken professional planning advice, the Parish Council resolved to object to three strategic sites proposed by promoters at:

Land to the East of Billingshurst.

Land to the West of Billingshurst.

Land South of Adversane.

These were being promoted to Horsham District Council in the hope that they would be chosen and allocated by HDC as Strategic Sites in its new Local Plan.

The Council considered that the parish had taken more than its fair share of new housing in the past, often with little by way of benefit to the area in terms of new infrastructure and services etc.

Early in 2021, HDC announced its preference for new Strategic Site allocations and only included Land to the East of Billingshurst, within the parish, albeit with the parcel to the south of the railway line excluded for landscape reasons, which was a point that the Parish Council had previously argued.

At Regulation 18 stage of the Horsham District Local Plan, the Parish Council considered the matter on 21 November 2021.

Its Local Plan Working Party had received presentations from sponsors of developments to the West of Billingshurst (Highwood) and East of Billingshurst (Bellway). The sponsor of the development south of Adversane had failed to respond/attend.

Despite the recommendation of the Working Party in following the advice of its own planning consultant (plus Council officers) to support East of Billingshurst, the Council resolved to instead support West of Billingshurst, largely due to the additional benefits that Cllrs felt would accrue to the whole community, even though West would deliver 1,000 homes as opposed to the 650 to the East.

The Council was lobbied by a number of local groups, who wanted it to show favour to development to the west, over that to the east. These groups were not 'pro' development but could see that the community would gain many more benefit from the west development, compared to the east. The Council agreed that if Billingshurst had to take a development to

the east, or west, that west would be a better option out of the two for this reason. At the time, many councillors had the view that it was likely that HDC would ultimately allow both developments, if not then, but at some point in the future, therefore it was felt important to take the opportunity of increased community benefits, while that offer existed.

The Council simultaneously entered into a legal agreement with the Highwood Group to give landlord's consent to improve sporting facilities at Jubilee Fields, in the event it should receive planning consent for its development.

However, some Cllrs felt uncomfortable with the apparent dichotomy of the Council on the one hand opposing all new large developments, but at the same time entering into a legal agreement with the same regarding the delivery of infrastructure.

To this end the Council subsequently agreed the following position statement:

Billingshurst Parish Council is opposed to large scale developments being constructed within the Parish. However, when developers are exploring options, the Council is ready and willing to work with developers for the benefit of the community as they make their application. Therefore, BPC will support West of Billingshurst in so far as we will work with the developer of West as a landowner for what BPC can gain on behalf of the community, but as a Council remain formally opposed to large scale development in the community.

Bellway, the developer of East of Billingshurst, did ask the Parish Council if it would meet to discuss a masterplan for its site, and when the Council said *yes* but it would have to be in public, (in accordance with its Protocol on Pre-Application Meetings with Developers) the developer withdrew the invitation.

It is worth noting that Highwood, the developer for the West has regularly engaged with the Parish Council and Community, usually in public.

Horsham District Council's initial Draft Local Plan, proposed a strategic housing allocation to the East of Billingshurst, and embarked upon Regulation 19 consultation, which asks if their proposals are *Legally Compliant and Sound etc*

The Council resolved to challenge the Plan on the grounds that it is not legal and sound, as it had, *inter alia*, failed to acknowledge the legal agreement made between the Parish Council and BSRA which guaranteed the delivery of community facilities, plus inconsistent and possibly biased scoring of the East of Billingshurst site which the District was favouring over the West of Billingshurst site.

The Plan then went to Examination in the Winter of 2024-25 but was halted for reasons well documented elsewhere. The Examination restarted with a new inspector earlier this year.

Proposed Modifications to the Horsham District Local Plan.

In order to meet uplifted housing delivery targets set by Government, the District Council is now inviting comments on Proposed Modifications to the Horsham District Local Plan.

Three proposals affect the Parish of Billingshurst:

- a. Extension of existing development: Land at Old Reservoir Farm comprising 80 homes. (HDC says small sites are required to maintain continuity of supply pending delivery at larger sites.)
- b. Extension of the draft allocation at East of Billingshurst of 650 homes to now include land south of the railway line, previously excluded, for a further 350 homes making 1,000 homes.
- c. A brand-new settlement South of Adversane of 3,200 homes. Much of this proposal once built will actually be in West Chiltington Parish. However, Officers believe this will have the most impact upon Billingshurst so believe it appropriate that this Council comments.
(Note vehicular distances from Adversane Beacon to: Billingshurst Railway Station 1.7 miles; Swan Corner Pulborough 3.7 miles; West Chiltington Queens Head crossroads 3.9 miles.)

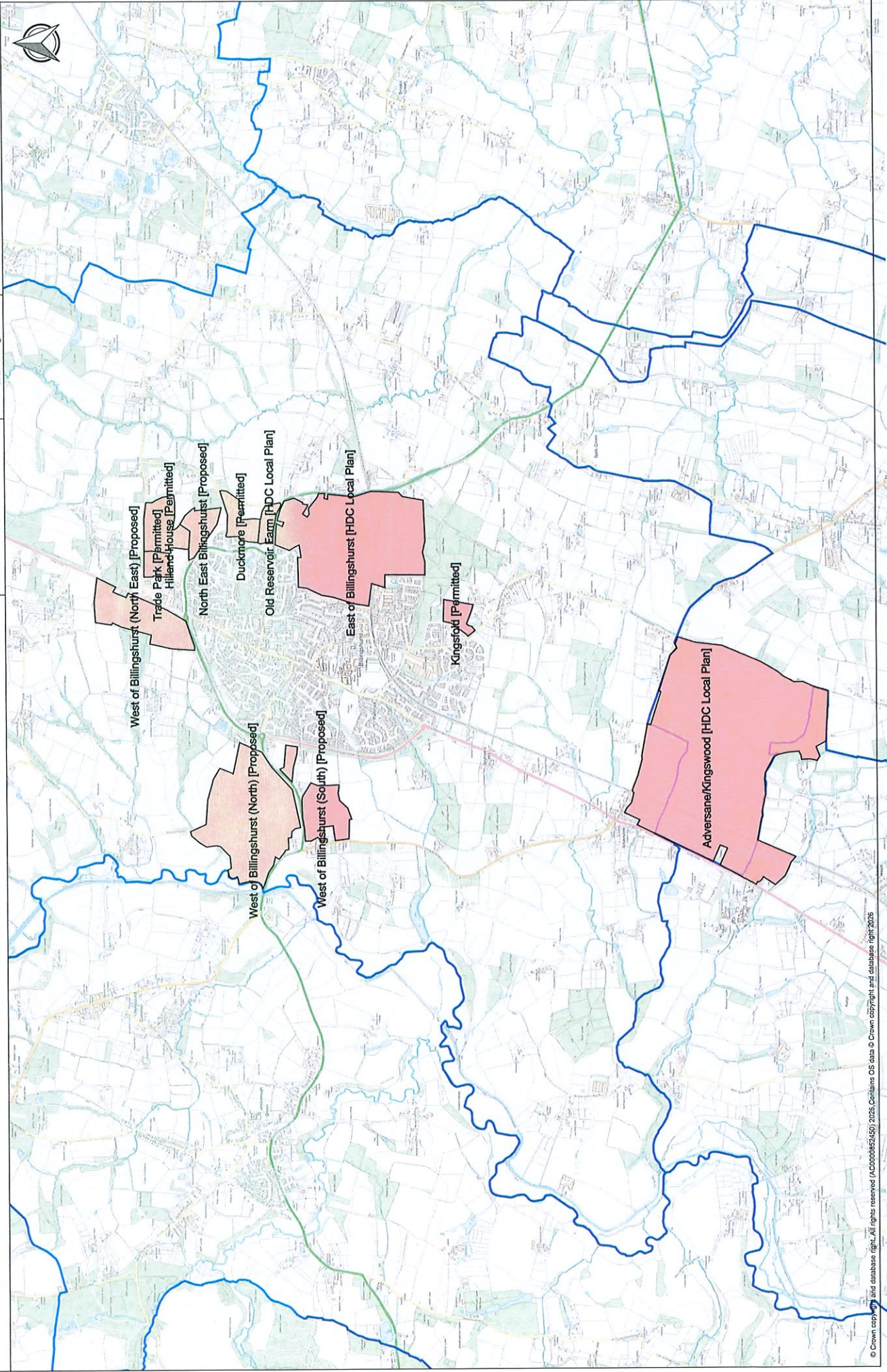
Attached maps for information

All new sites proposed.

Parish boundaries across South Adversane + distances to nearest village centres.

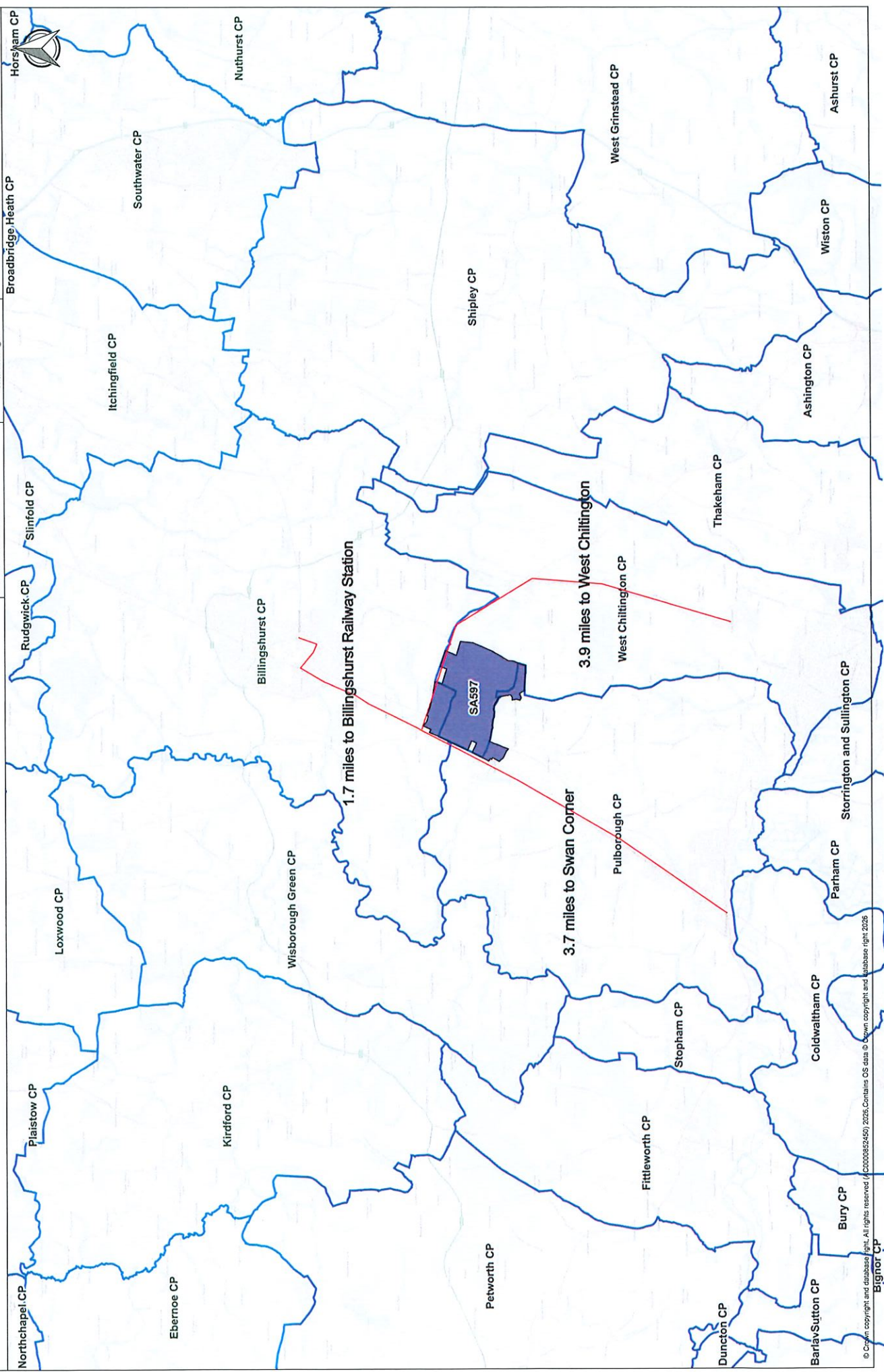
Flood risk across South Adversane.

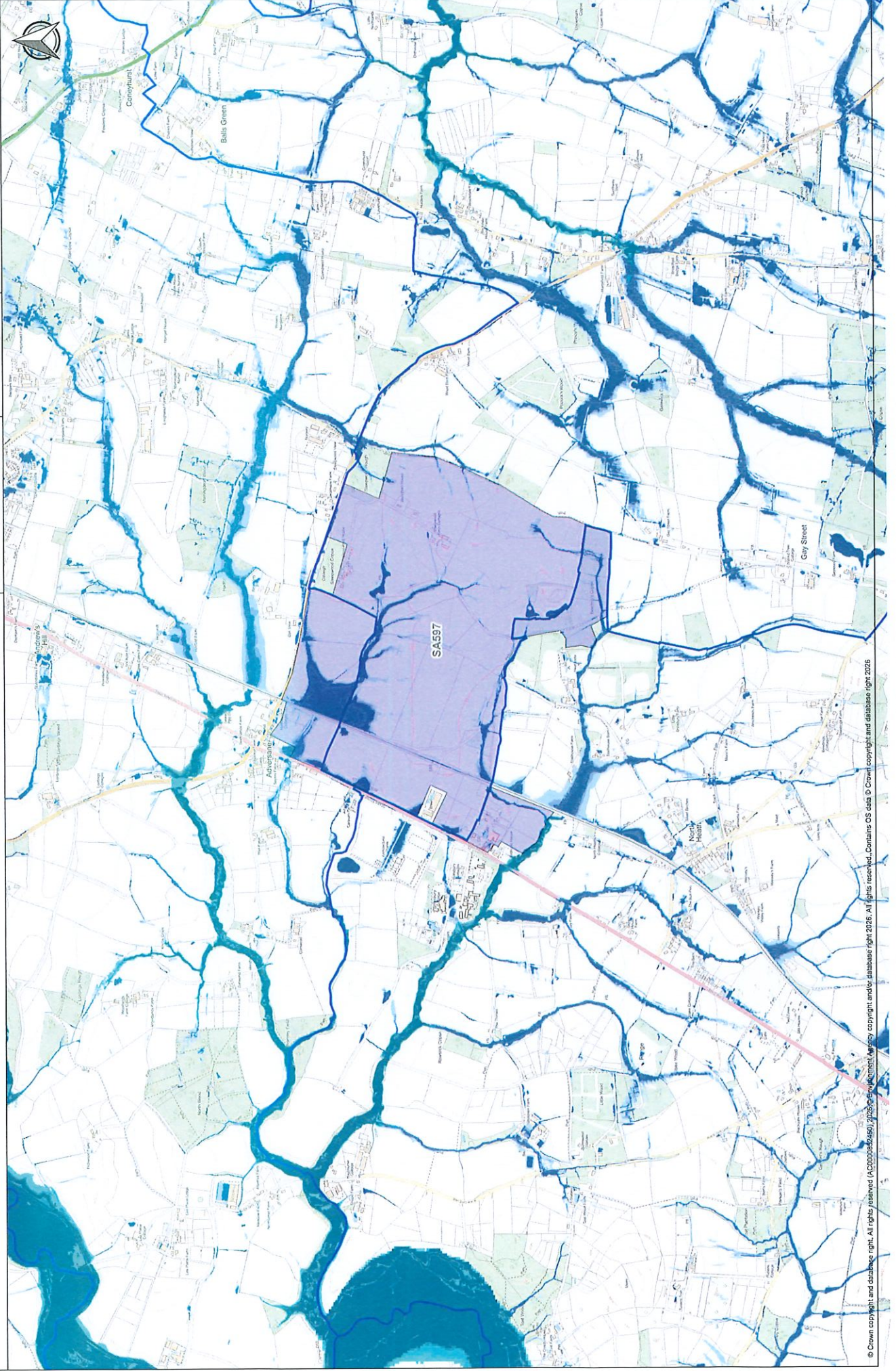
Given that this Council is against all major new housing development in the parish, (although would prefer West of Billingshurst if a site is required) the Council is invited to consider the following draft objections which I have restricted to the two largest of the 3 proposals.



Billingshurst
 Author: R. Plant
 Date: 27/07/2026
 0 200 400 600 1000m
 Scale: 1:50000 @ A3
PARISH ONLINE

Author: R. Plant
Date: 27/07/2026





HORSHAM DISTRICT LOCAL PLAN EXAMINATION SCHEDULE OF SUGGESTED MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN 2023-2040

REPRESENTATION ON BEHALF OF BILLINGSHURST PARISH COUNCIL

Relating to the following Suggested Main Modifications:

- MM29 – Chapter 4, Para 4.16 – Strategic Sites, Land at Adversane (Kingswood)
- MM30 – Chapter 4, Para 4.17 – Strategic Sites, Land at Adversane (Kingswood)
- MM35 – Chapter 4, Figure 3 – Horsham District Key Diagram
- MM145 – Chapter 10, Para 10.26 – Housing Provision
- MM147 – Chapter 10, Strategic Policy 37 – Housing Provision
- MM223 – Chapter 10, Para 10.114 – Land East of Billingshurst (supporting text to Strategic Policy HA4)
- MM226 – Chapter 10, Strategic Policy HA4 – Land East of Billingshurst (relating to full policy wording as set out at Appendix 2 of Main Modifications)
- MM227 – Chapter 10, New Strategic Policy HA(NP1) and supporting text – Land at Adversane (Kingswood) (as set out at Appendix 2 of Main Modifications)
- MM231 – Chapter 10, New Additional Strategic Policy HA(NP2) and supporting text – Billingshurst Housing Allocation for BL1 Land at Old Reservoir – 80 Homes

1. Introduction

1.1 This representation is submitted by Nova Planning Limited on behalf of Billingshurst Parish Council (hereafter referred to as "BPC") in respect of the Horsham District Local Plan Examination Schedule of Suggested Main Modifications to the Submission Local Plan 2023-2040. This representation focuses on the Suggested Main Modifications which directly affect Billingshurst Parish.

1.2 BPC is generally opposed to large-scale development within its administrative area. However, BPC recognises the overriding need to provide additional housing to meet the increased requirement for Horsham District and acknowledges that this may necessitate the identification of one or more strategic sites within or affecting Billingshurst Parish. Against this background, the Suggested Main Modifications consultation document (July 2026) identifies three proposed strategic allocations within or affecting the Parish as follows:

- Strategic Policy HA4 – Land East of Billingshurst: 1,000 dwellings (amended as part of the Suggested Main Modifications to include previously excluded land to the south of the railway line and increased from 650 dwellings previously proposed in the Regulation 19 Plan);
- Strategic Policy HA(NP1) – Land at Adversane (Kingswood): a new settlement including 3,200 dwellings located between Billingshurst and Pulborough (located primarily within West Chiltington Parish but within the southern edge of Billingshurst Parish);
- Strategic Policy HA(NP2) – Land at Old Reservoir, Billingshurst: 80 dwellings located immediately to the north of Land East of Billingshurst (Strategic Policy HA4).

- 1.3 Despite these three proposed strategic sites being identified in the emerging Local Plan, BPC's strong preference remains for Land West of Billingshurst to be allocated as the primary expansion of Billingshurst. BPC's position is based on the evidence that Land West of Billingshurst is the option that has most clearly demonstrated its deliverability and is capable of providing a sustainable extension to Billingshurst. BPC is supportive of the extensive services and facilities to be offered to the local community as part of the Land West of Billingshurst proposals, including care provision, a community centre, nursery/pre-school in addition to a primary school, retail space, sports facilities, a country park and public open space. Land East of Billingshurst may be a logical broad location for growth, but it raises significant deliverability concerns which are identified in this representation. BPC has consistently submitted representations confirming this preferred hierarchy at all stages in the preparation of the emerging Local Plan and has provided clear and consistent justification in support of this approach. In May 2023, BPC first released the following Position Statement:

"Billingshurst Parish Council is opposed to large scale developments being constructed within the Parish. However, when developers are exploring options, the Council is ready and willing to work with developers for the benefit of the community as they make their application. Therefore, BPC will support West of Billingshurst in so far as we will work with the developer of West as a landowner for what BPC can gain on behalf of the community, but as a Council remain formally opposed to large scale development in the community."

- 1.4 Despite the above, Horsham District Council (hereafter referred to as 'HDC') has continued to identify Land East of Billingshurst as the primary strategic allocation extending the settlement as part of the emerging Local Plan. BPC remain frustrated that despite clearly stating their preferred option to allocate Land West of Billingshurst, this has not been taken into account as part of the Submission Local Plan (January 2024), during the Examination or as part of the current Suggested Main Modifications stage.
- 1.5 In addition, as well as ignoring BPC's preference to allocate Land West of Billingshurst, HDC's Suggested Main Modifications now include a substantial shift in the spatial strategy for Horsham District with the introduction of Land at Adversane as a new settlement partially located within Billingshurst Parish. Given its location, this proposed new allocation is of significant interest to BPC and represents its least preferred option for a strategic site within the Parish for the reasons explained later in this representation.
- 1.6 BPC also has procedural concerns in relation to the introduction of such a large allocation at this late stage in the preparation of the emerging Local Plan, resulting in insufficient time for consultation or the preparation of robust evidence to justify the proposed changes to the Spatial Strategy. Accordingly, this representation focuses on an assessment of the updated evidence base that has been prepared by HDC in support of the Suggested Main Modifications insofar as they relate to Billingshurst Parish, with cross-references to the previous evidence base where relevant. The representation then assesses the key Suggested Main Modifications applicable to Billingshurst Parish in the context of the review of the updated evidence base.
- 1.7 For the avoidance of doubt, this representation is framed on the basis of the overall level of growth proposed by HDC through the Suggested Main Modifications. BPC does not accept that the distribution of that growth has been properly justified, but recognises that the current consultation is concerned with

whether the Suggested Main Modifications would make the Plan sound. The representations below therefore assess whether, assuming the overall level of growth now advanced by HDC, the proposed spatial distribution and strategic allocations affecting Billingshurst Parish are justified, effective and represent the most appropriate strategy when assessed against reasonable alternatives.

- 1.8 BPC concludes that the Suggested Main Modifications have not been properly justified and that the associated policies have not been demonstrated to be effective. The emerging Local Plan should therefore not be considered sound unless the identified deficiencies in the evidence base, site selection process, infrastructure assumptions and policy wording are addressed

2. Assessment of the 2026 Updated Evidence Base

Horsham Local Plan Sustainability Appraisal (SA) Report Addendum – July 2026

- 2.1 The SA Report Addendum sets out an appraisal of HDC's preferred Spatial Strategy proposed in the Suggested Main Modifications, as well as the reasonable alternative 'growth scenarios'. Paragraph 2.2.1 of the SA Report Addendum states that it is appropriate for the existing allocations within the Submission Local Plan to be assumed as a constant across all of the reasonable alternative growth scenarios that are considered and that whilst they are not a fait accompli, "...the Inspector has given a clear direction that a focus of the current Main Mods consultation is on new allocations". BPC does not agree with this assumption as the first Local Plan Inspector cancelled any further Examination Hearings in December 2024 before the soundness of the Submission allocations was considered and they were not discussed in detail as part of the second set of Examination Hearings in April 2026. It cannot therefore be assumed that the Submission allocations were concluded to be sound by the Inspector.
- 2.2 In addition to the above, the Submission allocations are in any event directly affected by the Suggested Main Modifications, including the proposed allocation for Land East of Billingshurst (MM226 – Strategic Policy HA4), which has been amended to include the previously excluded land south of the railway line to provide an additional 350 dwellings. This significantly increases the proposed allocation from 650 dwellings to 1,000 dwellings in total. In light of this, and given the extent of additional growth now being proposed via the Suggested Main Modifications, all growth scenarios should be reviewed afresh as part of the current stage, including removing the Submission allocations from some scenarios. The decision to not re-engage with Land East of Billingshurst and the other Submission allocations as part of the SA Report Addendum is not valid and these should not be considered as a constant where they are now proposed to be significantly amended as in the case of Land East of Billingshurst. Instead, all proposed allocations (at whichever stage of the Plan they were introduced), including Land East of Billingshurst, should be assessed or re-assessed at the current Suggested Main Modifications stage to confirm that they are sound. For the reasons stated in this representation, BPC has significant concerns with the soundness of some of the proposed allocations within the Suggested Main Modifications, including Land East of Billingshurst and Land at Adversane.
- 2.3 Having regard to the six growth scenarios tested as part of the SA Report Addendum, all six assume the allocation of Land East of Billingshurst (together with the other Submission allocations along with other sources of supply). Only Scenario 5 includes Land West of Billingshurst, and this strategic site is only considered in combination with a new settlement at Buck Barn. BPC notes the statement at Paragraph

2.2.32 of the SA Report Addendum that “...there is not necessarily a need to appraise on every feasible site combination...and there is a need to minimise the number of scenarios aimed at effective consultation...”. However, in order to be robust and sufficiently justify the preferred growth scenario to be taken forward in the emerging Local Plan, additional scenarios should be assessed including those which consider Land West of Billingshurst in place of Land East of Billingshurst, particularly given they are now comparable in terms of the quantum of development they deliver. Otherwise, the current situation whereby all six assessed growth scenarios within the SA carry forward the Submission allocations, including Land East of Billingshurst, has the effect of skewing the outcomes of the SA in favour of what can only be assumed to be a pre-determined outcome, contrary to how a SA should correctly be undertaken.

- 2.4 The SA must provide a robust assessment of reasonable alternatives. Where a materially different option has not been assessed, or where comparable alternatives are assessed inconsistently without clear justification, there is a risk that the appraisal does not provide a robust and proportionate basis for selecting the preferred strategy.
- 2.5 In particular, at Paragraphs 2.2.14 and 2.2.30 of the SA Report Addendum, the option of allocating Land West of Billingshurst in combination with Land at Adversane is ruled out on the basis that high growth in the Billingshurst area and along the A29 would be a concern and that there would be delivery risks. BPC understands and agrees that the level of growth associated with allocating Land East of Billingshurst, Land West of Billingshurst and Land at Adversane within the same Plan period would be excessive. However, that does not justify the selection of Land at Adversane in preference to Buck Barn, nor does it justify retaining Land East of Billingshurst as a fait accompli extension of Billingshurst given the deliverability issues outlined in this representation and the availability of a more sustainable alternative at Land West of Billingshurst where no such deliverability issues exist.
- 2.6 HDC has not demonstrated, on the basis of proportionate evidence, that Land at Adversane represents the most appropriate new settlement option when compared with Buck Barn. In BPC's view, Buck Barn would achieve a more balanced spatial strategy by distributing strategic growth away from the Billingshurst area and reducing the concentration of large-scale allocations within and around Billingshurst Parish. This is particularly important given that the Suggested Main Modifications already propose a strategic urban extension at Land East of Billingshurst and an additional strategic allocation at Land at Old Reservoir, Billingshurst. By contrast, the Land at Adversane option would cluster a very substantial proportion of the District's additional growth along the A29 corridor and within the functional catchment of Billingshurst, placing disproportionate pressure on the settlement, its infrastructure and surrounding rural communities.
- 2.7 HDC's own SA commentary (including Paragraph 2.3.10) recognises that there is a planning case for Buck Barn as an alternative new settlement option, including because it is better related to the key centres of population and the south coast towns. That relationship is significant because a new settlement should contribute to a coherent District-wide spatial strategy rather than compounding growth pressures in one part of the District. In BPC's view, Buck Barn would provide a better distribution of strategic growth, would avoid the cumulative concentration of development around Billingshurst, and would reduce the extent to which the Plan relies on multiple major allocations affecting the same parish and infrastructure corridor.

- 2.8 For these reasons, BPC considers that HDC has not demonstrated that Land at Adversane is a better or more appropriate alternative strategic option than Buck Barn. If the objective is to meet the overall level of growth identified in the Suggested Main Modifications, that growth should be distributed in a manner which is proportionate, balanced and capable of being supported by infrastructure. On that basis, Buck Barn is a more sustainable and justified alternative to Land at Adversane, which in BPC's view should be identified as a strategic allocation in combination with Land West of Billingshurst. This would result in a similar level of growth as Scenario 1 and Scenario 2 of the SA, but in BPC's view would result in a more appropriate distribution of growth having regard to impacts on Billingshurst Parish. BPC's preference for allocating Buck Barn over Land at Adversane is set out in more detail in the comparative analysis of HDC's Site Assessment Report Update in the sub-section below.
- 2.9 However, if HDC continues to pursue Land at Adversane as its preferred new settlement option, then in combination with this BPC considers Land West of Billingshurst a more sustainable alternative to Land East of Billingshurst. This should be assessed as a reasonable alternative because it would maintain the overall level of growth being advanced through the Suggested Main Modifications, whilst removing deliverability issues and better justifying a Billingshurst extension than the currently proposed enlarged allocation at Land East of Billingshurst.
- 2.10 This is not a case for adding further growth at Billingshurst in addition to the growth proposed at Land at Adversane. Rather, it is BPC's position that, if Land at Adversane is selected as part of the overall growth strategy, Land West of Billingshurst should replace Land East of Billingshurst as the strategic extension to Billingshurst. The reasons for that preference are set out in the comparative analysis of HDC's Site Assessment Report Update in the sub-section below, including the relative deliverability of the western option, its landscape-led structure, the ability to provide comprehensive community, leisure and green infrastructure, and the unresolved infrastructure and viability risks associated with the eastern option.
- 2.11 Having regard to the remainder of the SA Report Addendum, the final part of this sub-section responds to comments made in the report in relation to Land West of Billingshurst and Buck Barn, focusing on categories where these sites are given a lower rating than their comparable strategic sites without reasonable justification.
- 2.12 Paragraph 2.3.15 of the SA Report Addendum states a "strong preference" for Land at Adversane over Buck Barn because there is a significant need for new secondary school capacity in this part of the District and because a new secondary school is proposed as part of the North West Southwater allocation. Whilst the ideal to distribute secondary school provision is acknowledged by BPC, this should not be the determining factor in allocating Land at Adversane rather than Buck Barn when weighed against the assessment of the other key considerations discussed in the 'Site Assessment' sub-section below. At secondary school age, it is commonplace for children to travel by bus to school so if Buck Barn were identified as a new settlement instead of Land at Adversane, developer contributions from Land West of Billingshurst (or Land East of Billingshurst) could support the delivery of a new secondary school as part of that new settlement and/or developer contributions could support a new secondary school proposed as part of the North West Southwater allocation. If Land at Adversane is allocated as the new settlement option, the distance from Billingshurst (circa 2 miles) is likely to mean that children from Billingshurst (including any new allocation at West or East Billingshurst) will still need to travel by

bus (or car) to a secondary school on this site, as would be the case with Buck Barn. In BPC's view, the shorter distance / journey time associated with a secondary school on Land at Adversane is not sufficient justification for selecting this option for a new settlement over Buck Barn, but does appear to be the primary reason given by HDC in the evidence base.

- 2.13 Paragraph 2.3.15 of the SA Report Addendum also criticises Land West of Billingshurst in relation to the potential adverse impact on secondary school provision. However, any such impact would also arise from an allocation at Land East of Billingshurst and the two proposals should therefore be assessed equally against this criterion. In either case, secondary school provision could be addressed through developer contributions towards expanding existing secondary school capacity in Billingshurst. Alternatively, if Land at Adversane is allocated as currently proposed, developer contributions could support the delivery of a new secondary school as part of this new settlement (or at Buck Barn as an alternative). Accordingly, the need for mitigation does not distinguish the two sites east and west of Billingshurst and should not justify a materially different appraisal outcome. Overall, in BPC's view there is a solution to secondary school provision with any combination of the potential allocations, such that Land at Adversane and Buck Barn should be assessed equally against this criterion, and Land West of Billingshurst and Land East of Billingshurst should be considered comparable to each other as well.
- 2.14 Paragraph 2.3.25 of the SA Report Addendum criticises Land West of Billingshurst on the basis that it may only provide a small-scale or outreach healthcare facility compared to potential on Land at Adversane and Buck Barn to provide a full healthcare facility. However, the SA Report Addendum goes on to note (including at Paragraph 3.1.22) that in all three cases there is inherent uncertainty regarding delivery as it would be contingent on future decision-making by the NHS Integrated Care Board. Nevertheless, due to the differences in the size of Land West of Billingshurst compared to Land at Adversane or Buck Barn, it is not reasonable to compare the level of healthcare provision proposed at the former with these two much larger strategic sites. It is instead more reasonable to compare Land West of Billingshurst and Land East of Billingshurst in terms of their relative sizes and it is noted that there is no requirement for healthcare provision within the policy wording for the Land East of Billingshurst allocation, such that there should similarly be no expectation for healthcare provision at Land West of Billingshurst. Despite this, Land West of Billingshurst can provide a small-scale or outreach healthcare facility, whereas nothing has been included as part of any proposals suggested for Land East of Billingshurst to date. The latter is therefore less favourable than Land to the West of Billingshurst in relation to healthcare provision.
- 2.15 Comparing Land at Adversane with Buck Barn in relation to healthcare provision, Paragraph 2.3.25 of the SA Report Addendum confirms that Land at Adversane *"...performed less well than Buck Barn in terms of integrating green/blue infrastructure, open space and community facilities aimed at a 'cohesive community'"* and that Buck Barn scores *"...much more favourably under 'Leisure/Recreation/Community Facilities'".* This is discussed in more detail in the comparative analysis of HDC's Site Assessment Report Update in the sub-section below.
- 2.16 Paragraph 2.3.40 of the SA Report Addendum confirms that Land at Adversane and Buck Barn perform comparably in landscape terms. Paragraph 2.3.41 states that Land at Adversane would be a more compact new settlement in terms of land area, resulting in a more efficient use of land, but in BPC's view this difference of approximately 75 hectares is not significant enough in the context of the size of a new

settlement to be a key driver in determining the preferred location. For various technical/environmental/ownership reasons, the ultimate area of land available for development at Adversane or Buck Barn is still subject to change in the future.

- 2.17 Paragraph 2.3.73 of the SA Report Addendum states “...a preference for Buck Barn over Adversane in transport terms, although this is marginal...”, but then goes on to list the transport-related benefits of Adversane. The paragraph concludes “Buck Barn is located on the A24 and in relative proximity to Horsham and Crawley, and transport appears to be at the heart of the scheme vision...There would be good potential to cycle to Southwater whilst the potential to deliver upgrades to allow cycling to Adversane from Billingshurst are less clear.” It is unclear to BPC why these conclusions in relation to transport matters have not been given greater weight in determining the preferred location for a new settlement compared to matters such as secondary school provision.
- 2.18 Further to the above, BPC has significant concerns with the allocation of a new settlement on Land at Adversane, particularly in relation to transport impacts on the village of Billingshurst and its surrounding road network. The close proximity of Land at Adversane to Billingshurst (circa 2 miles) will result in new residents travelling to Billingshurst, especially before the services and facilities proposed as part of the new settlement are delivered. Whilst solutions such as a park-and-ride facility to Billingshurst Station have been suggested, the existing road network in the village centre does not have the capacity (road width) to support such a service with additional large vehicles creating traffic congestion. The proposal to close the B2133 Adversane Lane at the level crossing and divert traffic through the new settlement towards Billingshurst centre is inappropriate, with this road carrying considerable volumes of HGV traffic unsuitable to pass through a new residential-led community. The proposals will result in increased traffic in both directions along Marringdean Road which is also unsuitable for HGV traffic. BPC agrees with the conclusions at Paragraph 2.3.69 of the SA Report Addendum in relation to the poor pedestrian/cycle links between Billingshurst and Adversane, including the narrow width of the existing footpath along the A29/Stane Street and the intermittent footpath along Marringdean Road.
- 2.19 Paragraph 2.3.69 of the SA Report Addendum also suggests there are significant transport concerns with an allocation at Land West of Billingshurst due to its separation from the settlement by the A29, a lack of direct walking or cycling routes and the distance of the site from railway station encouraging additional car journeys. Instead, BPC notes that no reference is made to the existing at-grade bridges and pedestrian/cycle connections from Land West of Billingshurst to the village centre which provide easy and quick travel between the two and BPC understands that a new traffic-light controlled crossing over the A29 is included as part of the proposals. It is also noted that a range of on-site services and facilities are included as part of the proposals for Land West of Billingshurst, therefore reducing the need for off-site travel. In comparison, the existing railway line separates the northern and southern areas of Land East of Billingshurst, which will result in the intensified use of the existing uncontrolled crossing without a bridge. These matters are discussed in further detail in the sub-sections below, including the viability and deliverability concerns relating to the infrastructure associated with Land East of Billingshurst. Accordingly, Land West of Billingshurst should not be concluded as inferior to Land East of Billingshurst in relation to transport.
- 2.20 Paragraph 2.3.87 of the SA Report Addendum confirms that both Land at Adversane and Buck Barn would deliver well-located employment opportunities, but that Buck Barn would deliver significantly

more employment land than Land at Adversane (30,000 sqm compared to 12,000 sqm). Paragraph 2.3.88 also confirms a preference for Buck Barn over Land at Adversane in terms of supporting economic growth that is well-linked to sub-regional centres and the growth-constrained south coast. It is BPC's view that economic/employment benefits such as these should be given as much weight in determining the preferred location for a new settlement as matters such as secondary school provision.

- 2.21 Paragraph 2.3.88 of the SA Report Addendum also states there is a limited case for economic growth via employment land at Billingshurst, but this includes the whole settlement and is therefore equally true of both the sites to the west and east of Billingshurst. In support of Land West of Billingshurst, Paragraph 2.3.90 acknowledges that the proposals include employment opportunities created by the petrol filling station and retail use(s) including a convenience food store. The proposals for this site also include a care home, community centre and pre-school/nursery, as well as the primary school, all of which will create employment. BPC also notes that this site is located in close proximity to several existing employment opportunities on the western and northern sides of Billingshurst Trade & Business Park (via Stane Street) and to the south-west of Platts Roundabout.

Horsham District Council Site Assessment Report Update – June 2026

- 2.22 The Site Assessment Report Update provides a thematic comparison of strategic options, including landscape, biodiversity, housing, education, transport, leisure and community facilities, employment, retail, viability and development quality. While that approach provides a logical framework for comparison, the conclusions reached are only robust if the evidence has been applied consistently and proportionately across all reasonable alternatives. In respect of Billingshurst, BPC considers that the assessment does not fairly or reasonably assess the relative merits, risks and deliverability of Land West of Billingshurst compared to Land East of Billingshurst nor Land at Adversane compared to Buck Barn. The following text considers each of these comparisons in turn.
- 2.23 In particular, the assessment understates the benefits of Land West of Billingshurst, especially in relation to landscape-led design, community infrastructure, leisure and recreation provision, placemaking and the ability to deliver a comprehensive and sustainable neighbourhood. Conversely, it gives insufficient scrutiny to unresolved uncertainties associated with Land East of Billingshurst, including the requirement for new railway crossing infrastructure, associated viability implications and delivery risk.
- 2.24 The landscape assessment accepts that Land East of Billingshurst may have a lower landscape impact than Land West of Billingshurst, but it gives insufficient recognition to the landscape-led approach that could be delivered to the west of the settlement despite confirming that the Landscape Capacity Study 2021 indicates the site has some capacity for development. The western option is capable of incorporating substantial green infrastructure, public open space, habitat creation, recreational routes and a significant country park as an integral part of the development strategy. A more dispersed form of development is therefore not necessarily a weakness; it can be an outcome of a genuinely landscape-led approach which seeks to retain landscape character and integrate development with green infrastructure. BPC therefore considers that the assessment overstates the landscape harm associated with Land West of Billingshurst.

- 2.25 The assessment is also inconsistent in its treatment of education. Land West of Billingshurst is assessed as 'very unfavourable' on the basis that cumulative development at Billingshurst would create additional secondary school demand. However, that is not a site-specific criticism and would apply equally to Land East of Billingshurst. Land East of Billingshurst is nevertheless assessed more favourably despite relying on future provision and financial contributions. The need for additional secondary education capacity is a consequence of cumulative growth at Billingshurst rather than a distinguishing characteristic of either strategic option. Accordingly, it should not justify materially different appraisal outcomes. BPC also notes that, when comparing the 2023 Site Assessment Report with the 2026 Update, it is not clear why Land West of Billingshurst is now assessed as 'very unfavourable' in relation to education, compared to 'unfavourable' in 2023, with the wording associated with these assessments largely similar in both documents. In terms of primary education, the assessment of Land East of Billingshurst affords weight to the proposals including land for a primary school. However, no similar acknowledgement is given in the assessment of Land West of Billingshurst which also proposes to provide 2.2ha for a 2FE school, as well as an additional 0.2ha for pre-school provision. Land West of Billingshurst should therefore be given the same rating as Land East of Billingshurst (or better when the pre-school provision is also accounted for).
- 2.26 In relation to transport, the assessment places substantial weight on the separation of Land West of Billingshurst from the existing village centre and the presence of the A29, but does not give equivalent weight to the ability of a strategic allocation to provide a new neighbourhood with its own local centre, community facilities, education provision, retail, employment, mobility and leisure infrastructure. BPC accepts that parts of Land East of Billingshurst benefit from proximity to the existing settlement, but other parts of the site are separated from the village centre by the industrial estate as well as the railway line, and access to the village centre will depend on railway crossing infrastructure which has not yet been designed, agreed with Network Rail or clearly costed. This matter is discussed in further detail in the viability sub-section and Section 3 below. No consideration appears to be given to the fact that proximity to the village centre will vary across both sites, with some parts much closer than others. The assessment appears to assume successful delivery of infrastructure for Land East of Billingshurst while treating the spatial separation of Land West of Billingshurst by the A29 as a more definitive constraint. A strategy that provides its own local centre, employment, retail, education, community facilities and leisure infrastructure should not be assessed solely by reference to its distance from the existing village centre. BPC also notes that no reference is made to the existing at-grade bridges and pedestrian/cycle connections from Land West of Billingshurst to the village centre, which provide easy and quick travel between the two, and BPC understands that a new traffic-light controlled crossing over the A29 is included as part of the proposals.
- 2.27 The leisure, recreation and community facilities assessment also fails to recognise the qualitative difference between the strategic options. Land West of Billingshurst is capable of providing a wider and more comprehensive package of community, sport, recreation and green infrastructure than is reflected in the assessment. These facilities would not simply mitigate the impacts of development; they would form part of the structure of a sustainable neighbourhood and would deliver benefits for both new and existing residents. The assessment gives insufficient weight to these wider placemaking benefits. The assessment for Buck Barn rates this site 'very positive' in this category, with the list of facilities this site is proposing not dissimilar to those proposed at Land West of Billingshurst. It is therefore unclear why the latter is not given a more positive assessment in this category as well, particularly given it is much smaller than Buck Barn and is offering a significant level of leisure / recreation / community facilities.

- 2.28 The assessment of "Development Quality" appears largely to repeat conclusions already reached under the preceding assessment themes. This risks double-counting perceived disadvantages associated with Land West of Billingshurst, rather than providing an independent assessment of placemaking quality. The assessment should instead focus upon the quality of the proposed neighbourhood, including landscape-led design, green infrastructure, community facilities and the creation of a sustainable mixed-use settlement. Accordingly, the assessment gives disproportionate weight to matters already considered elsewhere.
- 2.29 Turning to Land at Adversane and Buck Barn, the key categories where BPC questions the assessment of the two potential new settlements are education, leisure/recreation/community facilities, transport and other infrastructure.
- 2.30 BPC's position in relation to the assessment of secondary school provision in particular is discussed in detail in the previous sub-section and it remains unclear why the locational preference for a secondary school on Land at Adversane should outweigh any other adverse impacts associated with the allocation of this new settlement and/or the benefits associated with the allocation of a new settlement at Buck Barn. For the reasons set out above, suitable secondary school provision is achievable with either new settlement such that they should be assessed as equal. Even if Land at Adversane continues to be given a 'very positive' assessment and Buck Barn remains 'favourable', this difference of one in the scale of ratings in the Site Assessment Report Update appears to only be based on the locational preference for a secondary school on Land at Adversane. This is not sufficient to be the determining factor in identifying the preferred location for a new settlement when the conclusions of the other categories in the assessment are taken into account, as discussed below.
- 2.31 In comparison, Buck Barn is assessed as 'very positive' in relation to leisure/recreation/community facilities, compared to only 'neutral' for Land at Adversane (a difference of two in the scale of ratings). The reasons given for this include a more limited provision of open space on Land at Adversane.
- 2.32 In relation to transport, both new settlement options are assessed as 'neutral' but, given the conclusions set out in the SA Report Addendum (as discussed in the sub-section above), it is unclear why they are assessed as equal and why Buck Barn is not given a more positive assessment. Similarly, both new settlement options are assessed as 'favourable' in relation to 'economy', contrary to the conclusions of the SA Report Addendum (as discussed in the sub-section above). Greater weight should be given to the significantly higher level of employment floorspace provision proposed at Buck Barn.
- 2.33 The final category where the two new settlement options are assessed differently is in relation to 'other infrastructure', with Land at Adversane being 'unfavourable' and Buck Barn being 'neutral'. The assessment identifies a need for local upgrades to the electricity network for Land at Adversane including short-term fixes to enable delivery of the early phases and possibly a major capital scheme for reinforcement works that would take "several years to complete" to serve the whole site. Water and sewerage upgrades are also likely to be required. Uncertainties relating to the deliverability and viability of these utility upgrades result in the 'unfavourable' assessment for Land at Adversane. No such issues are identified for Buck Barn with sufficient capacity identified for this potential new settlement.

Insufficient weight has been given to these issues in identifying Land at Adversane as the preferred location for a new settlement.

- 2.34 All the above inconsistencies have the effect of skewing the outcomes of the Site Assessment Report Update in favour of what can only be assumed to be a pre-determined outcome in allocating Land at Adversane and Land East of Billingshurst, and is contrary to how the assessment should correctly be undertaken.

Horsham District Council Local Plan Viability Assessment Main Report – Redacted – June 2026

- 2.35 The Local Plan Viability Assessment does not provide sufficient clarity as to whether the bridge or underpass required by the modified Strategic Policy HA4 has been specifically costed within the appraisal for Land East of Billingshurst. The assessment includes general infrastructure and abnormal cost allowances, but it does not disaggregate those allowances to show whether, or to what extent, the railway crossing works are included. The fact that it has not yet been determined whether the solution requires a bridge or an underpass also raises deliverability and viability concerns, as the costs and constraints associated with each option are likely to be considerably different. This lack of certainty also confirms that there is no agreement in place with Network Rail.
- 2.36 That lack of clarity is significant. The modified policy requires the existing level crossing to be closed and replaced by a fully accessible bridge or underpass. That infrastructure is central to the acceptability and deliverability of the allocation, yet the evidence does not demonstrate that a feasible engineering solution has been identified, that Network Rail requirements are understood, that delivery constraints and costs have been assessed, or that the allocation can still meet the other policy obligations, including affordable housing, education, transport, community, ecological and open space requirements. Until these key deliverability and viability matters have been addressed through proportionate evidence, HDC has not shown that Strategic Policy HA4 is capable of being delivered within the Plan period.
- 2.37 The Planning Practice Guidance on Viability states that viability assessments should ensure that policies are realistic and that the cumulative cost of all relevant policies will not undermine plan deliverability. HDC has not demonstrated that the cumulative cost of Strategic Policy HA4, including the now mandatory railway bridge or underpass, has been assessed on that basis.
- 2.38 This omission goes directly to soundness. The allocation is not justified if it is preferred without proportionate evidence on a principal infrastructure dependency, and it is not effective if that infrastructure has not been shown to be deliverable, fundable and capable of timely delivery. In contrast, the evidence in respect of Land West of Billingshurst identifies the principal infrastructure requirements associated with that option and indicates that these can be accommodated as part of a viable strategic proposal.
- 2.39 The above assessment affects the Suggested Main Modifications listed at the beginning of this representation and the issues identified with the evidence base results in the associated draft policies and supporting text (also listed above) being flawed for the reasons provided. It is therefore concluded that the preferred Growth Scenario and associated Strategic Site Allocations have not been properly justified and are not effective, such that the emerging Plan should not be considered sound.

3. Assessment of the Suggested Main Modifications relating to the Proposed Strategic Allocations Policies affecting Billingshurst Parish Council

Strategic Policy H4 – Land East of Billingshurst

- 3.1 BPC does not support the allocation of Land East of Billingshurst. However, in the event that Strategic Policy HA4 is carried forward, BPC considers that the policy wording and supporting text must be amended to ensure that the allocation is justified, effective and deliverable. The Suggested Main Modifications do not currently achieve this.
- 3.2 MM223 does not resolve BPC's concerns regarding the railway crossing. The proposed wording of the policy allows for either a bridge or an underpass. For the reasons set out above in relation to viability and deliverability, this should not be left as an option, and instead the most appropriate solution should be determined prior to the adoption of the policy and confirmed in its wording to ensure that it is effective and justified.
- 3.4 The proposed delivery trigger for the bridge/underpass is ineffective as the wording of the policy only requires land to be safeguarded and for provision to be phased "as necessary" in accordance with railway safety requirements. The supporting text to the policy states that a footbridge or underpass is necessary to address public safety risks arising from the additional housing proposed. These provisions are therefore inconsistent. If the crossing is necessary to make the development safe and acceptable, these requirements arise from first occupation. The trigger for its delivery needs to be agreed and specified from the outset, and not deferred to a later stage, otherwise as currently worded it presents a significant public safety concern.
- 3.5 The proposed delivery trigger also allows the provision of ramped wheelchair access to be delayed until the completion of all dwellings (i.e. in conjunction with the 1,000th dwelling). Most commercial developers will avoid building the final dwelling to avoid triggering the requirement to construct the ramped wheelchair access and gain back the land associated with this. If the infrastructure is required to provide accessibility for all users, this requirement arises from first occupation and not only at completion of the final dwelling as currently worded. The proposed delivery trigger for the ramped wheelchair access therefore needs to be amended, otherwise as currently worded it presents a significant accessibility issue.
- 3.6 MM226 similarly defers rather than resolves the key deliverability questions. The modified policy requires a comprehensive masterplan and related strategies to be agreed at a later stage, but a strategic allocation of this scale should be supported at plan-making stage by clear evidence that the principal infrastructure requirements are capable of being delivered and funded without undermining the objectives of the allocation. The most significant unresolved issue remains the railway crossing, because the policy requires closure of the existing level crossing and provision of a replacement bridge or underpass without confirming the engineering solution, Network Rail requirements, cost, programme or viability implications.
- 3.7 The modifications also intensify rather than remove viability concerns. The expanded allocation is expected to deliver 1,000 homes, 35% affordable housing, education provision, a community hub,

employment floorspace, open space and recreation facilities, sustainable transport measures, station car parking, railway crossing infrastructure and ecological mitigation. In the absence of a clearly identified and evidenced bridge or underpass cost, it cannot be concluded that Strategic Policy HA4 is capable of delivering both the required infrastructure and policy-compliant affordable housing.

Strategic Policy HA(NP1): Land at Adversane (Kingswood)

- 3.8 BPC does not support the allocation of Land at Adversane. However, in the event that Strategic Policy HA(NP1) is carried forward, BPC considers that the policy wording and supporting text must be amended to ensure that the allocation is justified, effective and deliverable. The Suggested Main Modifications do not currently achieve this.
- 3.9 MM227 does not adequately address BPC's concerns with the allocation of a new settlement at Adversane, particularly in relation to transport matters. The supporting text and proposed wording at Section 6 of the policy defers the submission of a comprehensive transport strategy and refers to other highway and transport schemes being identified "as necessary" to mitigate traffic and access impacts. In BPC's view, a new settlement cannot be allocated without a comprehensive transport strategy being fully set out in the policy wording from the outset. If a new settlement is to be allocated on Land at Adversane, BPC considers it essential for all highway and transport schemes necessary to mitigate the level of growth proposed to be identified and agreed at the plan-making stage in order to ensure the policy is fully justified. This should include addressing BPC's transport-related concerns with allocating Land at Adversane as set out earlier in this representation.
- 3.10 This draft policy also requires a comprehensive masterplan and related strategies to be agreed at a later stage, but, as with Land East of Billingshurst, a new settlement allocation should be supported at plan-making stage by clear evidence that the principal infrastructure requirements are capable of being delivered and funded without undermining the objectives of the allocation. Similarly, with this allocation, a key unresolved issue is the railway crossing, with the policy requiring closure of the existing level crossing and provision of a replacement bridge or underpass without confirming the engineering solution, Network Rail requirements, cost, programme or viability implications. This again has the effect of deferring rather than resolving key deliverability questions associated with the allocation of this proposed new settlement.

4 Conclusion

- 4.4 HDC has not demonstrated, on the basis of proportionate evidence, that the proposed new settlement at Adversane represents the most appropriate strategic option when compared with Buck Barn. Nor has it demonstrated why the enlarged allocation at Land East of Billingshurst should be preferred to Land West of Billingshurst. The Sustainability Appraisal has not consistently assessed these reasonable alternatives, with the result that HDC has not shown that its preferred spatial strategy represents the most appropriate strategy when assessed against the reasonable alternatives. Accordingly, the Plan is not justified.
- 4.5 The assessment of Land East of Billingshurst does not adequately resolve the infrastructure, viability and phasing risks associated with Strategic Policy HA4. In particular, the reliance on an unconfirmed railway

bridge or underpass is a fundamental weakness in the evidence supporting the allocation. Unless further evidence is provided to demonstrate that the expanded allocation, including the railway crossing infrastructure and associated mitigation, is deliverable and viable within the Plan period, HDC has not demonstrated that Strategic Policy HA4 is effective. Accordingly, the modified policy cannot be found sound. For the reasons set out above, the same conclusion is drawn in relation to Strategic Policy HA(NP1) – Land at Adversane (Kingswood).