



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 5a) and b): The Spatial Strategy and site selection

Questions i - iii

September 2026

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The Spatial Strategy and site selection

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

1. The Plan's spatial strategy successfully responds to the District's evidenced housing need, and housing need arising in adjoining districts and boroughs. It is sympathetic to the existing pattern of development in the District and responds to the need for a step change in growth during the life of the Plan to deliver the required level of growth sustainably.
2. The housing need the plan seeks to address has been established as follows, and is a combination of the District's own need and an element of unmet need arising in adjacent district and boroughs:

Table 1: Housing need to be met by the Plan

Authority area	Housing Need
Horsham District	14,071
Crawley Borough	3,757
Worthing Borough Council	548
Adur District Council	339
Total Housing Need (Requirement)	18,712

3. Broadly, the spatial strategy results in development coming forward in the subareas of the District as shown in Table 2 below. These subareas have been defined and assessed in the **Housing Delivery Study (HDCJB20)** as having their own economic and market characteristics and varying capacity to absorb housing growth. Essentially, the 'North' includes the corridor Crawley-Horsham-Southwater extended into the rural central area; the 'South' includes the settlements Storrington, Steyning, Upper Beeding, Henfield, Ashington and nearby smaller villages, and the 'West' comprises Billingshurst, Pulborough and West Chiltington (see **HDCJB20** paragraph 4.13 for more detail). The distribution of growth across these subareas is key to ensuring the Plan can deliver the number of homes required in the Plan period.

Table 2: Proposed housing supply by subarea

Area of district	Plan site supply	Supply from other commitments	Total plan period supply
North	5,281	7,226	12,507
South	1,531	1,809	3,357

West	2,545	812	3,340
Undefined (windfall, smaller sites)	0	1,711	1,711
All District	9,357	11,588	20,915

4. Early work on the spatial strategy and sustainability appraisal examined a range of potential growth scenarios, exploring how these could be delivered sustainably. In addition to the consideration of the function of different subareas, the evidence base work on settlements, such as settlement sustainability have reinforced the approach to settlement hierarchy set out under the second section of this document (from paragraph 18). These have been assessed through the Council's sustainability appraisal, which has tested high-level strategies and strategic sites against sustainability objectives ('SA objectives'). These have focused on both the development quantum, and spatial strategy options. Outcomes are set out in **Sustainability Appraisal (SA) (SD03a-d)** and the **Sustainability Appraisal (HDCJB13)**, the latter of which has assessed both the modification sites and the impact on the Plan altogether, including on the Plan's ability to provide affordable and sustainable housing that meets local needs. In particular, Section 2 of **HDCJB13** sets out a number of considerations relating to market absorption and wider sustainability as well as settlement and site specific issues which have fed into the resulting spatial strategy. Having regard to this evidence has ensured that the sites selected for allocation respond to the identified level of need arising both within and beyond the District, provide for that need in a sustainable manner through appropriate site selection, and support a strategy that is deliverable over the plan period.
5. The relationship between the key strategic site allocations and how they meet identified housing needs is summarised in the following paragraphs:

Land West of Ifield

6. The North sub-area of Horsham district is assessed in the **Housing Delivery Study (HDCJB20)** as being capable of accommodating a significant level of growth in part because of its connections to Gatwick, Crawley and London and the associated high levels of economic activity and likely growth. Icen's study has also considered how delivery of sites in the North subarea could dovetail with likely growth arising from the Crawley Local Plan, picking up where growth in Crawley itself begins to tail off and responding to the significant level of unmet need in the Borough.
7. The strategic allocation Land West of Ifield is located in the north-east of the district, physically adjoining Crawley. The site will therefore make a significant contribution towards the housing needs arising in Crawley Borough Council very close to where the need is generated. Further commentary on how specific housing needs are met is covered in section iii of this document. Whilst it is recognised that CBC has an in-principle objection to the proposal, there has been ongoing engagement with officers at Crawley Borough Council to understand the issues which Crawley borough faces and therefore ensure the allocation meets needs generated by Crawley Borough.
8. Furthermore, evidence from the earlier sustainability appraisal work recognise that in sustainability terms, the best performing urban extension sites (disregarding those no longer available) are West of Ifield and West of Southwater because of their close proximity to the main centres of population which are also of most importance for economic growth for the area at Crawley and Horsham town (see **SD03b** paragraph 5.48).

Land North East of Southwater

9. Southwater is classified as one of the Small Towns and Larger Villages in Strategic Policy 2: Development Hierarchy, meaning it is one of the most sustainable settlements in the District (as discussed further in paragraphs 18 to 26 of this statement). It sits in the North subarea, meaning there is relatively strong market capacity to absorb housing growth, and it is close to the main settlement of Horsham with good transport links. Discussions with the Education Authority indicated development of this scale (c. 1000 homes) would generate the need for secondary education provision and this would also help to meet wider education needs in this area of the District. As mentioned, the site is one of two urban extension sites identified through sustainability appraisal as the best performing in sustainability terms.

Land East of Billingshurst

10. Strategic development is proposed at Land East of Billingshurst. The northern parcel (650 units) was included in the submitted Plan, and a further 350 units have been proposed for allocation through Main Modifications on a land parcel to the south of the railway line. As discussed further in paragraphs 18 to 26, Billingshurst is classified as a Small Town/Large Village and is one of the most sustainable settlements in the district. Billingshurst is within the West subarea. Delivery in this area is expected to come forward more slowly than in the northern sub area of the District but is still identified as having potential and being necessary to deliver development which meets the needs of the District and adjoining areas.

Land at Adversane

11. Land at Adversane would come forward as a new settlement. This allocation is considered necessary to meet the scale of growth necessary to meet the Plan's housing requirement. Like East of Billingshurst, the site is within the West subarea. The site offers the only opportunity to deliver education infrastructure needed in this area of the District in order to meet growth both on site and in the Billingshurst area. It is considered that Adversane is, therefore, key to delivering the increase in growth required to meet the District's housing and other identified needs in full and to address unmet need elsewhere.

Smaller site allocations

12. While a significant proportion of the housing supply will come from strategic scale sites, a key component of the spatial strategy is the smaller sites which are focused on sustainable settlements. In terms of meeting the housing requirement in the right locations, the distribution of sites has taken into account which settlements have capacity to accommodate higher levels of growth to meet needs both within and outside of the District; settlements where some growth would help sustain or enhance the character and success of the settlement and smaller settlements nearby, and those where more limited development can be delivered sympathetically in order to meet local needs. This includes allocations within the southernmost section of the district, which would have a role in meeting identified housing needs from the south coast.
13. The increase in housing requirement following the reopening of the Local Plan examination, and the Council seeking to address unmet need in both Crawley to the north and the south coast, has made it necessary to revise the Site Assessment process particularly in respect of smaller site allocations. **(HDCJB14a-f)**. This has resulted in an increase in site allocations across the District, but focused on the south and the north subareas, as shown in Table 1.

Table 3: Homes from new smaller site allocations

Area of District	No. of homes from new smaller site allocations
North	723
South	1,261
West	80

14. In the north of the District, Kilnwood Vale is a new community adjoining the edge of Crawley. The original scheme was an allocation in the Joint Area Action Plan between Crawley Borough Council and HDC and was approved in 2011 for 2,500 homes. Development to the south of the railway line is largely complete with the final phase underway. Development north of the railway line is due to commence in 2029. The Plan proposes an extension to the existing Kilnwood Vale site and a planning application for this site is understood to be in preparation for submission in late 2026. The development will, along with the allocation West of Ifield, respond to the housing needs arising in Crawley, through a reiteration in policy that the scheme should reflect the Neighbourhood Principle of development in Crawley and should integrate with Crawley more widely.

Existing large-scale commitments

15. In establishing the rates of delivery likely through the plan period, it is important to take account of existing allocations and committed development which will contribute to the overall supply. In addition to the Submission and Main Modification site allocations there is significant committed development in the form of the Mowbray (Land North of Horsham) development, a site allocation in the previous local plan. The site has outline permission for up to 2,750 homes, and the HDLP makes provision for densification on this site (500 units). The development at Kilnwood Vale has been discussed in paragraph 14.
16. The trajectory is based on a suite of evidence which indicates the spatial distribution of sites and the mix of strategic scale and small sites would deliver sufficient homes in the plan period to meet the housing requirement and also provide a buffer / headroom for resilience. The **Housing Delivery Study (HDCJB20)** includes analysis of housing delivery in the District's subareas and this has been fed back into the trajectory and site selection work to shape assumptions about:
- The ability of sub-areas to accommodate varying levels of development,
 - The ability of different site combinations to deliver sustainable development, taking account of other concerns like infrastructure,
 - The number of smaller and larger sites that will be required to bring forward development.
17. The spatial approach taken ensures that the District will be able to accommodate a significant level of growth in the Plan period, with an additional element of headroom in the supply trajectory to ensure any uncertainty or delay is mitigated and the Plan remains effective. The approach to allocating sites for development is grounded in a robust assessment of the existing development pattern, a clear and

justified strategy for accommodating growth in and on the edge of existing settlements, and the allocation of a new settlement which can be delivered sustainably.

the settlement hierarchy and settlement character

18. In general terms, it is accepted that the most sustainable development is on sites which are located close to employment opportunities and have a good range of local services and facilities such as shops, schools, doctors' surgeries and recreational facilities, and are supported by having good opportunities for active travel as well as access to and by public transport. The first phase of the sustainability appraisal work (**SD03a-d**) found that retaining the existing settlement hierarchy together with additional urban extensions performed best against the sustainability objectives but recognised that in a higher growth scenario it may still be necessary to deliver some growth in the form of a new settlement.
19. Development in Horsham District has traditionally focused on smaller scale development adjoining existing villages and towns and larger scale urban extensions to deliver more strategic levels of growth. This has been delivered through a development hierarchy. Policy 3 of the current local plan (known as the **Horsham District Planning Framework**) sets out a settlement hierarchy in order to deliver the most sustainable patterns of growth whilst retaining the overall characteristics of individual towns and villages.
20. The existing hierarchy was therefore subject to a review to consider whether this remained fit for purpose and to provide a more detailed basis on which to make recommendations as to where site allocations would be most appropriate. The **Settlement Sustainability Assessment 2022 (EN07)** provides a summary of the results, with full details presented in Appendix 2 of that document.
21. The assessment considered how different settlements in the district are currently 'performing' in terms of their sustainability. It took account of a range of characteristics from each settlement, including population statistics, employment sites, school provision, retail, transport and presence of a wide range of other community facilities. The Council sought input from parish councils to ensure that this information was as accurate and incorporated local knowledge. The outcome of this work shows that whilst there is variation in the characteristics of each settlement, they can be grouped into settlements which have broadly similar levels of services / facilities and therefore ability to accommodate new growth.
22. The outcome of this study concluded that in broad terms, Horsham town remains the most sustainable settlement in the district. It offers the widest range of services and facilities, alongside a range of employment opportunities. Other settlements (classified as Smaller Towns/ Larger villages), including Southwater and Billingshurst were also found to continue to perform well against a range of sustainability criteria. These settlements act as hubs for day-to-day services for other surrounding smaller settlements. These were therefore assessed as being able to accommodate or absorb a higher level of growth than other smaller settlements.
23. Other smaller settlements were assessed as being able to accommodate some additional development to help ensure existing services and facilities remain viable in the future. The study did however identify that the district contains some smaller hamlets which are currently classified countryside, which risked artificially restricting a limited amount of development that would help these settlements retain their character and function. The local plan therefore proposes to introduce a category of 'secondary settlements' to reflect the smallest settlements capable of accommodating very limited levels of growth. The process of identification of Secondary Settlements is set out within **EN02: Secondary Settlement Boundary Review**.

24. It is therefore considered that the outcome from this study supports the development of Strategic Policy 2 – Development Hierarchy. The policy seeks to direct development towards the most sustainable locations and ensure that the level of growth which takes place is appropriate to the scale of a particular settlement. There are six different classifications of settlement in Table 3 of the policy wording. These are: Main Town, Small Towns and Larger Villages, Medium Villages, Smaller Villages, Secondary Settlements and Unclassified settlements. Each is accompanied by a description of the settlement characteristics and function.
25. The primary focus of Strategic Policy 2 is the level of development within existing settlements, whereas the focus of Strategic Policy 3: Settlement Expansion is to set out principles used in the growth of settlements beyond their existing boundaries. This policy also draws on the outcome of **EN07**, with allocations that meet the identified local needs of these settlements, provide an appropriate level of housing, and maintain the viability of local schools, shops and facilities appropriate to their scale. In addition, the proximity and access to a range of services and facilities were considered on an individual site by site basis as part of the site assessment process. (**H11** and **HDCJB14 a-f**).
26. As a point of clarification, new settlements have not, been assigned a settlement category at this stage. Subsequent plan reviews would need to consider the extent to which planned services or facilities have been delivered within new developments, and what future categorisation of the related settlements may be appropriate on this basis.

[access to employment, social and community facilities and the objective of reducing the need to travel](#)

27. The approach the Council has taken in relation to consideration of social and community facilities is set out in paragraphs 18 to 26. The spatial location of new development has also taken account of feedback from key infrastructure providers in terms of additional provision which may be required to support growth. Specific infrastructure delivery requirements are identified in the Council's **Infrastructure Delivery Plan (IDP) (HDCJB19)**. This is discussed in further detail in paragraphs 54 to 67. With regards to healthcare, page 46 of **HDCJB19** also highlights that a new GP surgery is planned at North Horsham (Mowbray) with CIL funds now committed to its delivery. This facility will meet needs from the site, wider north Horsham and the Crawley area, therefore helping to support additional growth in the northern section of the district.
28. With regard to employment, HDC's **Matter 4 Employment Paper** (March 2026) (**HDCJB09**) signposts the key evidence to show the plan's proposed distribution of development is an appropriate spatial response to access to employment. **HDCJB09** paragraphs 3 to 9 highlight that Horsham, Crawley and Mid Sussex operate as a broad functional economic market area with a high concentration of employment within the District's main town of Horsham. Paragraphs 27 to 33 of **HDCJB09** sets out the approach to the allocation of sites and meeting employment needs which seeks to support meeting needs for the District taking account of the District's relationship with the wider FEMA. Proposed **Main Modification MM110** makes clear that 20 hectares of employment land is being allocated such that 40% lies within strategic site allocations, 55% enables existing industrial estates to expand in three separate locations across the District (all on the edge of existing or proposed settlement boundaries) and 5%, on the edge of Southwater, helps to make efficient use of land encircled by the A24 and main northern access road to Southwater. The suggested **Main Modification MM111** makes clear village and town centres will continue to be the focus for the delivery of non industrial/storage/office employment sectors, particularly those falling with Use Class E.

29. Appendix A provides a map of Horsham District which shows key road and rail links together with settlement locations and the principal environmental designations. There are no strategic road networks in the district; the nearest are the A23 which runs north-south through Mid Sussex District to the east, and the A27 which runs east west along the south coast. Within Horsham District the principal north-south routes are the A24, which links between Surrey to the north around the western edge of Horsham and the east of Southwater and Ashington linking the A27 at Worthing in the south, and the A29 which also links between Surrey and the A27 coastal route nearer Littlehampton and Chichester. Horsham is linked to settlements in the south-east of the District by the A281. Horsham and Crawley are connected by road via the A264. The main east west route through the District is the A272. This route through the central part of the district links Haywards Heath (Mid Sussex) in the east and Petworth (Chichester district) in the west. Settlements in the south of the district (between Steyning in the east to Pulborough in the west) are connected east - west by the A283.
30. Whilst development seeks to internalise travel as far as possible (by locating development close to existing or new facilities), it is recognised that there will be some requirement for travel between settlements in the district and beyond. The spatial strategy has taken account of these factors when considering potential allocations. This includes intensification of land north of Horsham which has good potential for bus travel into Crawley and links to the A264 and A24, whilst land West of Ifield is well located for bus and active travel into Crawley (and, via Crawley's rail stations, beyond) as well as for both the A23 and A264. Additional development close to the A24 includes the strategic development at Southwater together with a smaller allocation at Ashington. This puts them on the route for the commercial bus service 23 to Horsham and Crawley and, looking southwards, to Worthing. In addition, development is proposed on or close to the A29 at Billingshurst and Adversane.
31. Turning to strategic impacts on the highway, the Council has undertaken the Horsham Transport Study which is based on a traffic forecasting model – this has been updated to consider the additional sites and development allocated through the main modifications (see **Horsham Local Plan Transport Assessment – HDCJB15b**) and was prepared with detailed input from West Sussex County Council as local highway authority. This study has shown that the overall impact of the Local Plan at Main Modifications stage is now of lesser magnitude than was found to be the case when an earlier study was published in 2022, despite there being significantly more development now proposed. This is thought to be due in part to effects that the COVID-19 pandemic had on traffic levels, resulting in there being very little overall growth in traffic between 2019 and 2025.
32. The outcome of the revised transport is that with Local Plan developments, the road network will continue to operate effectively provided mitigation measures are put in place. It will however require 'big-ticket' physical mitigation at some junctions on the A24. These include the Hop Oast roundabout, Buck Barn crossroads and Washington Roundabout (the supporting text to Policy 24: Sustainable Transport makes clear that improvements to these will be supported through developer funding). The study recognises that development will increase congestion at other junctions on the road network but concludes that these can be mitigated through a combination of re-phasing traffic light priorities and implementing robust sustainable transport measures in new developments, including enhancements to bus services and good provision of active travel measures. All necessary strategic mitigations as identified in **HDCJB15b** are included in the **IDP (HDCJB19)**.
33. Impacts on the Strategic Road Network (i.e. the M23/A23 in Mid Sussex) were found to be minimal, and recommendations on how to address impacts have not changed since the submission version of the Plan. Appendix B to this statement is a response from National Highways that was submitted after

the main modifications consultation deadline, which usefully records that National Highways have supported a number of the main modifications consulted upon, and have not objected.

[the rail network](#) and [public transport and active travel](#)

34. As rail services, other forms of public transport and active travel are closely interconnected, the Council is responding to these matters comprehensively. **EN07, Appendix 3** provides detail of rail and bus services serving settlements and has considered the availability of other community led transport services. The outcomes from this study have informed the Council's settlement hierarchy and the location of larger strategic allocations, seeking to focus development close to existing provision, and which are accessible by active travel links. Allocation policies also set requirements to ensure that development is designed to prioritise active travel and journeys by public transport.
35. In general terms larger settlements in the district have the most frequent bus services with transport connectively more limited in rural areas. Horsham, Southwater and Billingshurst all have regular services, providing a basis for strategic allocations in these locations. Although outside HDC's administrative area, Crawley has a well served (Fastway) bus service which links to the West of Ifield development could be attained. This is discussed in further detail in Matter 6a – West of Ifield.
36. Horsham District has two railway lines. The Arun Valley line extends out from London via Crawley, Ifield to Horsham, through Christ's Hospital, Billingshurst and Pulborough to the south coast. The Sutton and Mole Valley line runs north from Horsham, through to Warnham, to Dorking and eventually connects to South West London. The Arun Valley line is the primary rail link in terms of the locations it serves, the frequency of service and speed of travel. West of Ifield is close to Ifield railway station, with developments (including intensification at North Horsham) close to Littlehaven Station and Horsham Station in Horsham town. Although Southwater does not have direct access to a station, it is close to Christ's Hospital (and can be accessed via the active travel route along the South Downs Link) and stations in Horsham town. Developments at Billingshurst and Adversane are also located on the railway within good proximity to a railway station which alongside access to bus services has been an important factor in the allocation of the Adversane site.

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

37. Map 1 set out in Appendix 1 shows the extent of Horsham District, with the main existing settlements, road and rail links and key environmental designations identified within National Planning Policy Framework (NPPF) para 11 footnote 7 (excluding heritage designations which are not visible at this map resolution). Overall, the district is relatively unconstrained in terms of the distribution of environmental designations defined in NPPF (September 2023) footnote 7. In addition to these designations, there is recognition that land which is, undesignated remain of importance, particularly in terms of the environmental services that they provide (including climate change mitigation and adaptation) along with potential for nature restoration in conjunction with the Local Nature Recovery Strategy. This has therefore provided an important context to the formation of the overall spatial strategy.

[landscape and countryside](#)

38. There are two principal landscape designations which impact Horsham District. The South Downs National Park runs broadly east west through the southernmost section of the District. Plan making in this area is the responsibility of the South Downs National Park Authority. Many of the settlements in the south of the district directly adjoin the national park boundary. Any expansion of settlements into the national park would therefore be a matter for the park authority (or neighbourhood plans) to determine. Notwithstanding this practical point, the national park designation remained an important

consideration in the identification of locations for growth, to ensuring that setting of the park and its purposes can be retained. This therefore provides some limitations to the extent to which development allocations can be made in the southmost section of the District.

39. The second landscape designation is the High Weald National Landscape (Area of Outstanding Natural Beauty / AONB) which covers significant parts of West Sussex, East Sussex and Kent. The westernmost portion of this designation is situated in the north eastern section of the District, adjoining Horsham town and extending eastward from south of the A264 and towards Mannings Heath. Small areas of the designation are also located around Lower Beeding. The NPPF (para 176 and 177) attaches great weight to the importance of these landscapes, and in general terms the Council has therefore not allocated development within this designation. Notwithstanding this, given the high need for housing and the sustainable nature of Horsham town, consideration was given as to whether any proposed sites within the AONB close to this settlement may be suitable for allocation. This is discussed further in the hearing statement relating to **Matter 6i: HA10 Horsham: site HOR3 only**.
40. In addition to the presence of national designations, the distribution of development also takes account of the wider landscape capacity as evidenced in **EN08 – Landscape Capacity Study**, and **EN05 – Landscape Character Assessment**. These documents recognise that development and change will occur, but seek to ensure that it does so in a way that takes account of the ability of the landscape to accommodate change, and ensure that the character of the landscape is considered and reflected in the layout and design of development that comes forward. These principles have fed into the requirement for landscape led development across policies and allocations within the plan.

[heritage assets and their settings](#)

41. Horsham District has a rich cultural heritage. Many settlements date back to the Saxon and medieval periods. Many towns and villages have a historic core and there are 1,845 listed buildings located across the District.
42. Recognising the potential for development to impact on heritage assets, Horsham District Council has undertaken a **Cultural Heritage Assessment (document EN09)**. This has considered the impact of potential development on a range of development types (housing, strategic sites, employment and Gypsies and Travellers). The purpose of the study was to establish and identify designated and undesignated heritage assets and identify where their significance may be altered by proposed development. Further consideration of heritage impacts was undertaken as part of the more detailed site assessment process (**documents HDCJB14 and H11**).
43. As heritage assets are distributed across the District, it is recognised that most strategic scale development will have a degree of impact on these designations. The study identified requirements for detailed site assessments to be undertaken in order to mitigate potential harms. These assessments confirmed that no heritage asset will be directly affected by development and no cases of substantial harm will arise. It is considered possible to balance the need for development and the public benefit arising from this, whilst preserving the historic settlement character, form and individual assets and mitigate those instances where indirect and less than substantial harm will arise.

[habitats and biodiversity](#)

44. Within Horsham District, most biodiversity constraints are on an individual basis, geographically relatively small in scale. There is however a significant network of ancient woodland, particularly in the northern section of the District. The presence and significance of biodiversity designations has been taken into account as part of the Council's site assessment work (**documents HDCJB14 and**

H11) and is supported by the Habitat Regulation Assessments, which has been updated to take account of the proposed modifications (**HDC12 and 12a**).

45. The plan does not identify land for built development on sites designated as important for nature conservation. Given the dispersed nature of environmental designations, some allocations do adjoin or have designations within their red line. In such instances necessary mitigations (such as 15m buffers on ancient woodland) have been put in place and where relevant are discussed further in respective site specific hearing statements. The plan is also supported by the Council's Green Infrastructure Strategy (**EN03**) which sets priorities for safeguarding existing habitats and biodiversity and creating connections to new habitats.
46. In recognition of the biodiversity crisis, Horsham District Council has set up the Wilder Horsham District Partnership with the Sussex Wildlife Trust. Prior to the formal Local Nature Recovery Strategy process, this partnership produced a district level Nature Recovery Network. Although not a constraint to growth, this document was an important consideration in understanding the significant opportunities for biodiversity and ecosystem services within the district and to ensure that allocations reflect this potential as appropriate. Since submission of the plan, work on the Sussex wide Local Nature Recovery Network has progressed, drawing on many of the principles established in the district wide nature recovery network. Horsham District was a 'supporting authority' as part of this process which has now concluded with the publication of the final strategy <https://www.sussexnaturerecovery.org.uk/publications>. Opportunities for nature recovery will therefore continue to be an important consideration when considering the potential for additional allocations.

flood risk and climate change mitigation

47. There are three main river catchments in Horsham District, the Rivers Arun, Adur and Mole. (See Map 1). The river catchments are not contiguous with local authority administrative boundaries, and work to understand flood risk has been undertaken jointly with neighbouring Local Planning Authorities where required, as well as advice from the Environment Agency.
48. A stand-alone **Strategic Flood Risk Assessment (CC03)** for the Adur and Arun River catchments was published in January 2020. It was informed by other relevant SFRA's in different parts of these river catchments. Together with Crawley Borough Council, Mid Sussex District Council and Reigate and Banstead District Council, the Council also commissioned an **Upper Mole Valley Strategic Flood Risk Assessment (CC06)** in September 2020. Subsequent changes in national planning policy, which included the risk of flooding from all sources, updated guidance on climate change allowances, and improvements in available flood mapping and modelling datasets, led the council to commission further updates to inform policy development: the **Strategic Flood Risk Assessment Update (CC04)** and the **Upper Mole Valley Strategic Flood Risk Assessment Update (CC07)**. Most recently the Council has undertaken an updated Flood Risk sequential and Exception Test (**HDCJB17**).
49. **HDCJB17** has considered the impact of a range of types of flooding on sites proposed for allocation and a number of alternatives. The results of the sequential test are summarised in paragraphs 4.10 to 4.26. Of the 40 proposed allocation sites, 35 were found to be sequentially preferable on the basis of the current or future risk of flooding. Where those sites do have some risk of flooding, it is a requirement for the site to be developed in a manner which accords with national policy requirements and proposed policies in the Local Plan (particularly Strategic Policy 10) relating to flooding. This has also been covered in site specific allocation policies, where appropriate.
50. Five proposed site allocations were identified in the sequential test as requiring further assessment, as they have broader parts of their area at risk of flooding. These sites were assessed against

reasonable alternatives and were subject to the exceptions test, the results of which are set out in section 5 of **HDCJB17**. All 5 proposed allocations have satisfied both requirements of the Exceptions Test, subject to adhering to the mitigation measures outlined which reflect both the site assessments and the overarching or, where appropriate, the site specific Local Plan policies. The Council has therefore struck an appropriate balance between the consideration of flood risk and meeting identified development requirements.

51. It should be noted that land in the south eastern corner of Horsham district (near Steyning) and the south west around Pulborough is particularly at risk of river flooding, which in addition to the South Downs National Park designation further limits the potential for expansion of some southern settlements.
52. There is a legal requirement placed upon the Council to take account of climate change. The Council has also declared a Climate and Ecological Emergency and is committed to the development and implementation of a range of measures that work towards a zero carbon target, to achieving net zero carbon emissions by 2050, and for its own operations to be carbon neutral by 2030. Impacts of climate change both in terms of mitigation and adaptation are directly addressed in Strategic Policies 6 to 9 (and their respective proposed modifications). Such considerations are relevant to all developments across the district.
53. One of the key sources of climate change emissions in Horsham District is transport. Therefore, the Council's spatial strategy approach seeks to minimise the need to travel, ensure trips can be as short as possible, and have options for sustainable travel and active transport as described in earlier sections of this paper and in more detail in the matter 6 hearing statements.

[services including water and sewerage](#)

54. Throughout the preparation of the Plan the Council has sought to engage openly and constructively with infrastructure providers, including water providers and sewerage undertakers, other utilities providers, the Education Authority, NHS, organisations responsible for bus and rail provision and infrastructure as well as leisure and open space. This began at the Issues and Options stage with a research phase and initial discussions to establish how the structure, organisation and funding of each stakeholder would interact with the plan making process and the nature and frequency of engagement that would ensure the spatial strategy can be delivered sustainably.
55. Progressive iterations of the spatial strategy, including combinations of strategic sites under assessment which have presented variations in spatial distribution across the district have been shared with infrastructure providers to allow the Council to build a picture of where infrastructure is likely to present a constraint to development or, in contrast, where infrastructure coming forward alongside development has the potential to address current or future constraints. This outcome of this engagement is set in the **IDP (HDCJB19)**.
56. Policy 23: Infrastructure Provision establishes the expectation that infrastructure should be timed to support associated development as it comes forward, and that this may require early engagement by the developer and phasing and implementation plans on relevant proposals. No infrastructure capacity constraints have been identified that would constitute an absolute impediment to delivery of the spatial strategy and distribution of development as a whole. In this context, the Council is confident that the Plan, spatial strategy and the underpinning evidence base is sound. Further detail on key topic areas is set out below.

Water supply, wastewater and sewerage

57. The Council is cognisant of the responsibility that sits with statutory undertakers, which have their own legal duties and powers conferred in legislation outside the planning system. Policy DM7 of the most recently published NPPF, under which decision makers are now operating, makes clear that planning decisions around land use should not seek to duplicate the operation of other regulatory regimes. The Council has, therefore, in the absence of any evidence to the contrary, assumed that infrastructure providers will operate in accordance with these regulatory regimes and any capacity issues can be resolved through these statutory duties. This will take the form of onsite reinforcement or larger scale projects which may need to be funded through the 5-year business planning process.
58. Notwithstanding the constraint that water neutrality temporarily placed on development, engagement with Southern Water (who are responsible for water supply across the District) in the early phases of plan preparation suggested no immediate or unresolvable issues with water supply in the District as a result of the spatial distribution or strategy. Subsequent engagement, and the increase in the amount of development expected in the Plan period, has resulted in some site-specific capacity issues which can be addressed through the New Infrastructure Charge to developers.
59. Southern Water have made clear in their representations that the limited capacity of some areas to accommodate development is not a constraint to development and have suggested additional policy criterion be added to the relevant site allocations policies. Whilst this is noted the Council considers this to be a duplication of wording included within Policy 23 and is therefore of the view that this addition is not required for soundness.

Electricity

60. Electricity supply is overseen by two operators – Scottish and Southern Electricity Networks (SSEN) own and operate the transmission network in the west of the District and UK Power Networks (UKPN) in the east. UKPN have consistently raised that reinforcements at Bolney Grid Supply Point will be required to support large scale development in the District, though is related to the scale of development as opposed to the spatial strategy itself and ongoing engagement and sharing of development trajectories and likely build out rates with UKPN feeds into their own long terms network planning.
61. The location of the Adversane site allocation means the developer may choose to connect to the UKPN or the SSEN network. If they were to connect to the SSEN network upgrades may be required, but these could be phased with development, and early engagement would mean this work need not delay the progress of any development. Policy 23 encourages early engagement by developers with infrastructure providers. Overall, there are no constraints introduced by the electricity network which mean the spatial strategy is not sound.

Education

62. As with other providers, the Council has shared possible development scenarios with West Sussex County Council (WSCC) as the Education Authority in order to understand the constraints and opportunities associated with varying combinations of strategic sites. The outcome of this engagement has fed into the Council's spatial strategy.
63. The Education Authority have communicated current capacity concerns with secondary school provision, noting that there are existing schools nearing or close to capacity and significant demand arising from local plan development placing additional burden. New primary schools are expected to be located within housing developments, where these are large enough to support a new school, and

their intake and catchment areas are smaller than for Secondary schools. Secondary schools take in pupils from a wider catchment and can be located less centrally than primary schools, and while there should be sustainable access it is accepted that pupils may travel longer distances.

64. WSCC's Planning School Places 2026¹ document concludes that there is some limited capacity in primary schools in the school planning areas. Expansion and new provision is planned at a primary level to accommodate background population growth, and the document indicates that there is scope for further expansion in places. As set out in the **IDP (HDCJB19)** WSCC have indicated there will need to be further expansion and new provision, including three new secondary schools to meet the needs arising from development proposed through the Local Plan. The nature of the intake for secondary schools means there is more need for these to be located strategically, ensuring their locations respond to population and demand, and existing provision.
65. WSCC have raised concern with future capacity and capability for expansion of secondary schools in the Billingshurst area. The existing secondary school in Billingshurst is at capacity with no scope for expansion, so development at Adversane with an additional secondary school being provided on site would meet the demand of the new strategic site HA(NP1) itself but also help address the demand arising from growth in and around Billingshurst. This has been a significant factor in the preference of the Adversane site over other potential strategic allocations.
66. There are similar existing capacity concerns with schooling in Crawley Borough and in the Southwater area, where there have been instances of children not being allocated a secondary school place within the District. While there have been adjustments made to secondary school provision to maximise capacity, i.e. the recent change of the remaining single sex school in Horsham to co-educational, large unplanned permissions in the area have added to concerns about future capacity. In response to this, strategic site allocations West of Ifield (HA2) and Land North West of Southwater (HA3) present a significant benefit, both proposing secondary schools which would provide future security around school places.
67. The provision of the Land at Adversane strategic allocation which delivers a secondary school would therefore assist in meeting existing and future needs in the western section of the district and limit school commuting distances.

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

different housing needs and aspirations would be adequately met

68. It is recognised that the NPPF expects small and medium size sites to make a significant contribution to meeting the housing requirements, and recognises the role of neighbourhood plans in allocating such sites. Table 4 below summarises the distribution of allocated sites by size / number of homes – this shows that whilst many larger sites are needed to meet the district-wide requirement, there are also 37 smaller sites of 100 or less homes being allocated.
69. Table 5 shows the further smaller sites of 100 dwellings or less which have been allocated in neighbourhood plans – a total of 28.
70. It should be borne in mind that it is the strategic scale and larger sites that will make the greatest contribution to meeting affordable housing need and providing a range of housing types and sizes.

¹ <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/education-children-and-families-policies-and-reports/planning-school-places/>

Table 4: Sites proposed for allocation in the Local Plan by size and number of homes

Site yield (number of dwellings)	Number of sites	Number of dwellings on these sites
<10	4	27
10 to 50	21	573
51 to 100	12	902
101-999	9	2,379
1,000+	4	8,244
Total	50	12,125

Table 5: Sites allocated in neighbourhood plans by size and number of homes

Site yield (number of dwellings)	Number of sites	Number of dwellings on these sites
<10	6	42
10 to 50	18	422
51 to 100	4	296
101-999	4	1,025
1,000+	0	0
Total	32	1,785

71. It is also recognised that national policy seeks to steer development to previously developed land (brownfield sites). Horsham is a predominantly rural district, and there are therefore relatively few opportunities for brownfield development. Where such developments do come forward, they are normally located within established settlement boundaries representing the built-up area. As set out earlier in this statement, Strategic Policy 2: Development Hierarchy provides a positive framework for bringing forward brownfield land within the built-up area boundaries (BUABs), whilst Strategic Policy 3: Expansion of Existing Settlements (incorporating modifications) will also allow any appropriate edge-of-settlement brownfield sites to come forward.
72. Similarly, Strategic Policy 2 provides a permissive framework for sites generally to come forward within defined BUABs. There are 44 settlements listed in the policy that have a BUAB, providing wide opportunity for small sites within settlements to come forward.
73. Community-led and specialist types of housing and sites (rural exception sites for meeting parish level needs, Community Land Trusts, accessible homes) were considered in Week 1 of hearings with the Council's evidence set out in the **Housing Needs Topic Paper (HDCJB07)**. Similarly, Week 1 considered the Council's approach to dwelling mix in respect of different sizes of homes.

74. Following the reopening of the examination, the Council undertook a comprehensive programme of works to allow it to identify suitable sites which could form additional site allocations. This primarily involved revisiting earlier site assessment work (**CD01** and **H11**) to establish where smaller sites discounted under the initial site assessment methodology may have capacity for development. This included consideration where the planning context had changed (because of permissions granted on adjoining sites in the interim period) or where they had previously been excluded solely on constraints where mitigation measures are available. As well as updating its site assessment work, the Council refreshed other elements of the plan's evidence base, namely:
- Habitat Regulations Assessment (**HDCJB12** and **HDCJB12a**)
 - Sustainability Appraisal (**HDCJB13**)
 - Transport Assessment and Transport Scenario Testing (**HDCJB15a** and **HDCJB15b**)
 - Viability Study (**HDCJB16**)
 - Flood Risk Sequential and Exception Tests (**HDCJB17**)
 - Infrastructure Delivery Plan (**HDCJB19**)
 - Housing Delivery Study (**HDCJB20**)
75. The Council also wrote to the promoters of all sites within the submission trajectory (see Appendix C), as well as sites considered to have potential for allocation, to request updated information on anticipated planning permission and delivery timescales, build out rates, infrastructure provision and phasing of housing in relation to large infrastructure projects. This work has been undertaken in an iterative manner, with early outputs of the work being relayed back to the officers and consultants undertaking other pieces of work. In turn, these outputs have fed back into the housing trajectory, which has been kept constantly under review, to ensure assumptions about supply remain realistic and respond to any identified constraints which have been made evident through updates to the evidence base. To this effect, the delivery trajectory will ensure a sufficient number of homes will come forward by 2040 to meet the Plan's housing requirement.
76. The **Housing Delivery Study (HDCJB20)** is a key piece of the Council's evidence base in respect of the spatial strategy and the ability of the housing market and the District's subareas to accommodate development at the scale proposed. The strategy is tested not just against the housing requirement, or the capacity of different geographical areas of the District to absorb development (as discussed earlier in this statement), but also takes into account the range of housing products which enable different pools of housing demand to be accessed simultaneously, improving resilience. The spatial strategy does not place reliance on a single form or scale of site, combining strategic scale allocations with smaller settlement sites. It also concludes that product differentiation is key in helping the strategic sites to achieve the rate of delivery in the trajectory as different products address different market demands. This reduces the reliance on a single area of the market and also supports sustained delivery when the market is less able to absorb large scale open market housing. Paragraph 5.18 of **HDCJB20** concludes that affordable housing, different forms of retirement housing, build-to-rent and self/custom build are sectors capable of supporting housing delivery alongside market housing, providing the necessary resilience during market fluctuations.

Stepped Requirement

77. The overall requirement is based on Horsham's own local housing need, and an appropriate contribution towards unmet need in Crawley Borough and the south coast and is set at 18,712. Supply in the plan period is expected to be 20,915 – this provides enough homes to meet the requirement and a robust headroom of 2,203 homes in the plan period, a 12% uplift on the requirement, which will provide enough of a buffer to ensure the requirement can be met.
78. The Council has previously set out the need for a stepped requirement (**HDCJB05, HDCJB22**) which reflects the lag in commitments in the short term as a result of restrictions relating to water neutrality, and number of strategic sites which form part of the trajectory.
79. In his post-hearings letter (**IDJB05**) the Inspector made clear that the Council's work on housing supply should inform the stepped housing requirement, in order to ensure that a five-year housing land supply is maintained through the plan period. The Council has proposed the following stepped requirement through the Main Modifications process:

Table 6: Stepped requirement and unmet need contributions by year

Plan Year	Horsham Need	Crawley Need	Adur Need	Worthing Need	Stepped Requirement
2023/24	340	91	8	13	452
2024/25	241	64	6	9	320
2025/26	177	47	4	7	235
2026/27 – 2027/28	375	100	9	15	499
2028/29 – 2032/33	827	221	20	32	1,100
2033/34 – 2039/40	1,204	321	29	47	1,601

80. This approach uses supply assumptions to establish a stepped housing requirement. The annual requirement is then divided in line with each authority's proportion of the total need contribution (75% Horsham, 20% Crawley, 2% Adur and 3% Worthing). Applying these proportions to each year's requirement generates an annual distribution that maintains the agreed overall contribution to unmet need across the plan period, while also accounting for the stepped pattern of housing delivery expected over time.

Housing Supply

Completions

81. In the first three years of the Plan, there have been 1,007 completions, set out in Table 7:

Table 7: Completions to date

2023/24	2024/25	2025/26	Total
452	320	235	1,007

Commitments

82. At the start of June 2026 there are 9,111 commitments in the supply of sites, comprising sites with planning permission, or allocations in the current Horsham District Planning Framework or made Neighbourhood Plans.

Submission Sites and Main Modifications

83. The result of the work carried out following the first set of hearings has been the identification of a further 16 settlement allocations, 1 new strategic site and an extension to an existing proposed strategic scale allocation. Full detail of the housing supply position is provided in Appendix D and summarised in Table 8 below:

Table 8: Supply from site allocations

Site Allocation Type	Total Allocation	Supply in Plan Period
Strategic – Submission Sites	5,194	4,600
Strategic – Main Modifications	3,550	1,775
Settlement – Submission Sites	918	918
Settlement – Main Modifications	2,064	2,064

Windfalls

84. The Council's approach to assessing an appropriate windfall allowance is set out in **HO9**, and **HDCJB05** proposes an updated plan period figure to reflect the need for a rolling three-year period with no windfall supply to in order to avoid double counting with permissions. Using the annual figure of 120 homes per annum, this gives a supply of 1,440 windfall units to 2040.

Supply to Meet Requirement

85. The total plan requirement is 18,712. The Council set out to demonstrate a deliverable supply of no less than 20,100 units (the "high growth" scenario referred to in post-hearings correspondence **IDJB05**). The total supply shown in Table 9 below is 20,915 units in the plan period. This provides a headroom over and above the requirement of 2,203 units (12% of the total supply) by way of contingency to allow for under-delivery, thus achieving what the **SA Report Addendum (HDCJB13)** concludes is a "robust" headroom.

Table 9: Requirement v Supply

Plan Period	2023 - 2040
Housing Requirement	

Horsham Local Housing Need	14,071
Crawley Borough Unmet Need Contribution	3,757
Adur Unmet Need Contribution	340
Worthing Unmet Need Contribution	544
Total HDLP Housing Requirement	18,712
Housing Supply	
Completions 23/24 - 25/26	1,007
Commitments (permissions and existing allocations)	9,111
Total Committed Supply	10,118
HDLP Submission Site Allocations	5,518
Main Modification Site Allocations	3,839
Windfalls	1,440
Total HDLP Supply	20,915
Headroom	
Headroom Supply	2,203
Headroom % of Total Requirement	12%

86. The headroom represents the equivalent of an additional 3 years of the annualised supply of strategic HDLP site allocations and 2 years annualised supply of smaller sites, looking forward 14 years (2025/26 – 2039-40) from the year of adoption, as shown in Table 10 below. There is also a small allowance for delay in delivery of committed sites.

Table 10: Headroom equivalent to supply

Supply Source	Supply in Remaining Plan Period (2026/27 onwards)	Annualised Supply	Indicative Contingency	Equivalent Headroom
Strategic Site Allocations	6,375	455	3 years	1,366
Settlement Site Allocations	2,982	213	2 years	426
Commitments	9,111	651	0.5 year	651
Total	18,468	1,319	-	2,117

87. The Council considers the figure of 12% (2,203 units) to be an appropriate allowance for headroom. This figure takes account of the following elements:

- the Council's historically strong housing delivery performance (shown in Table 11) prior to Natural England's Position Statement,
- the legacy impact of water neutrality on delivery rate and supply certainty early in the plan period,
- market volatility and the higher risk of delay associated with strategic sites which make up 30% of supply in the plan period.

88. The Council has been clear that maintaining a five-year supply on adoption of the plan and as the plan progresses is vitally important to ensure the success of the plan and its policies that will shape development.
89. The Council is aware that the recently published update to the NPPF (policies S3-S5 in particular) introduces policies intended to support the positive consideration of the delivery of sustainable development in certain locations and circumstances. The principle of taking a positive approach to suitable development opportunities beyond existing settlement boundaries is already reflected in the Council's approach through the **Shaping Development in Horsham District Planning Advice Note (SDPAN)**. Accordingly, the NPPF changes do not themselves represent an immediate or significant change in the local planning context or the Council's approach to the consideration of development opportunities.

Table 11: Historic Housing Performance in Horsham District

Year	HDT Result	Over/Under Supply
2018	141%	+509
2019	148%	+664
2020	155%	+633
2021 - NE Position Statement Sept 2021	147%	+487
2022	98%	+83
2023	62%	-265
2024	53%	-737
2025	44%	-1,302

90. Assumptions about strategic site supply have been based on site-by-site analysis, using conversations with and information provided by site promoters, evidence of deliverability obtained through the **Housing Delivery Study (HDCJB20)** and the Council's own knowledge about how sites of different scales and in different locations tend to be delivered. Therefore, these are based on the most up to date information about the sites.

Five-Year Housing Land Supply

91. The projected five-year housing land supply is key to demonstrating that these homes will come forward at the right time in order to meet the housing requirement as the plan period progresses. In Table 6, the Council sets out the proposed stepped trajectory which should apply in the plan period.

Taking into account the projected supply set out above the Council will be able to demonstrate a five-year housing supply, shown in Table 12.

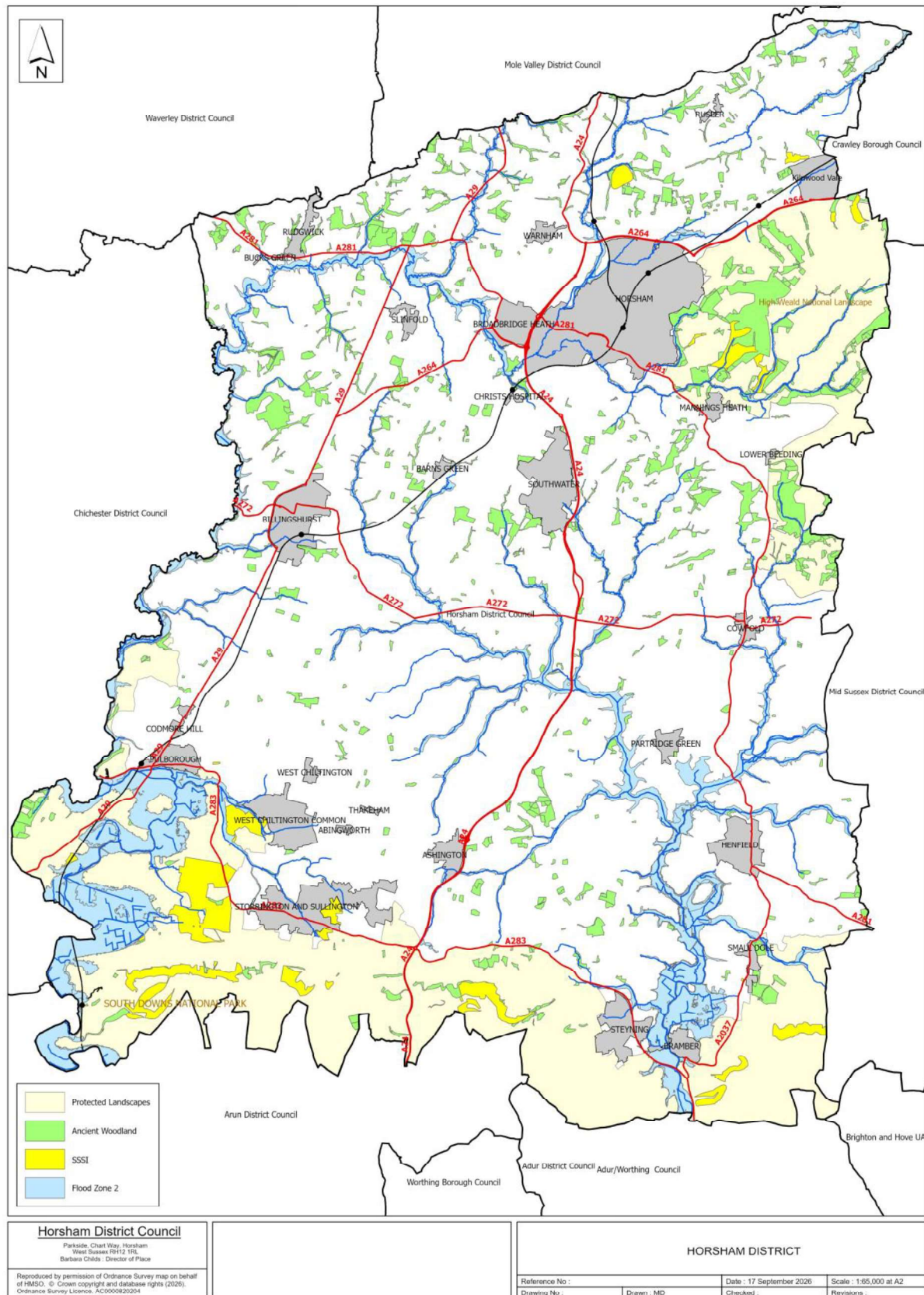
Table 12: Rolling requirement and supply

Year	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36
Annual requirement	4,298	4,899	5,500	6,001	6,502	7,003	7,504	8,005	8,005	8,005
Rolling 5yr requirement + 5% buffer	4,513	5,144	5,775	6,301	6,827	7,353	7,879	8,405	8,405	8,405
Rolling 5 yr supply	6,636	7,545	8,005	8,192	8,274	8,263	8,082	7,659	7,150	6,559
Yrs supply	7.4	7.3	6.9	6.5	6.1	5.6	5.1	4.6	4.3	3.9

92. The most recent Housing Delivery Test (HDT) was updated on 17 August 2026, and under the delivery results for 2024/2025 the Council is subject to the presumption in favour of sustainable development. Paragraphs 16 -18 of the Housing Delivery Test rulebook explain that local planning authorities may collaborate with MHCLG to have previous Housing Delivery Test results recalculated and the Council is actively pursuing this to ensure the Plan requirement from 2023/24 onwards is reflected in Horsham's HDT target. The adopted plan requirement will also mean paragraph 9(c) of the 2026 NPPF will not be engaged (as the annual requirement of 1,101 is 83% of the most up to date local housing need figure of 1,329). On this basis, and the backdating of the plan's requirement to 2023/24 to meet delivery meaning there is no shortfall, the Council considers a 5% buffer to be appropriate when calculating the five-year housing land supply.

Appendix A

Map of Horsham District showing key road and rail links, environmental designations and settlements



Appendix B

National Highways Main Modifications response

From: Nigel De Wit [REDACTED]
Sent: 24 August 2026 12:51
To: Matt.Bates; Strategic Planning
Cc: Planning SE; Mike Howell; JONES Derek; MORTON Hazel
Subject: Horsham District Local Plan - Main Modifications Consultation - NH response 24/08/26

Follow Up Flag: Follow up
Flag Status: Completed

Your ref: Horsham District Local Plan - Main Modifications Consultation

Our ref: NH/26/17053

Dear Matt,

Thank you for your email of 10 July 2026 inviting National Highways to respond to the consultation on the Horsham District Local Plan Main Modifications.

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A23 and the M23.

We understand that today (24 August 2026) is the last day of the consultation period. However, we did not appreciate that the deadline for submitting responses was midday.

We have therefore set out below our responses to the consultation.

We have no comments on legal compliance or the Sustainability Appraisal.

We recognise that these comments have been submitted after midday but we trust you will accept the submission and consider the points we have made:

Main Modification MM90

National Highways welcome the insertion of the monitor and manage approach to deliver transport infrastructure.

The A23/M23 is a finite resource and any meaningful improvement would be of a strategic scale for which the government has no current plans. Coupled with the transport vision for the plan and Horsham District Council's commitment to a monitor and manage approach, the plan as proposed to be modified will ensure that the Strategic Road Network (SRN – in this case the A23 and the M23) continues to function as a safe and efficient strategic route for as long as possible through sustainable transport policy and initiatives, minimising the need for travel on the SRN.

The monitor and manage strategy would need to be linked to the modal share targets in Travel Plans submitted in support of applications when they come forward, ensuring the vision-led approaches that underpin the assessments of the proposals are kept on track and delivered.

In the case of the Horsham Local Plan, the key section of interest to National Highways is adjacent to Hickstead, between the A2300 and B2118 junctions. Monitoring should include traffic

flow and accident severity/frequency over this specific section of the SRN. We would utilise monitoring data to feed into route strategies and where necessary, to promote the A23/M23 corridor for inclusion in future government Road Investment Strategies (RIS) programmes.

Main Modification MM90 makes the Local Plan sound by ensuring it is consistent with national policy, in this instance the Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development (December 2022).

Main Modification MM94

National Highways support the inclusion of a monitoring framework for Travel Plans. This can help ensure the vision-led approach that underpins the Transport Assessment is kept on track and is delivered.

Main Modification MM94 makes the Local Plan sound by ensuring it is effective and consistent with national policy, in this instance the Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development (December 2022).

Main Modification MM96

National Highways support the additional text requiring applicants to contribute to delivering or improving part of the local cycling and walking infrastructure. This can help manage down the traffic demands of developments which can help manage down the impacts on the Strategic Road Network (SRN).

Main Modification MM96 makes the Local Plan sound by ensuring it is effective and consistent with national policy, in this instance the Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development (December 2022).

Main Modification MM98

National Highways support the amended text because it can ensure applicants fully explore the potential for bus travel and infrastructure to serve developments. This can help manage down the traffic demands of developments which can help manage down the impacts on the Strategic Road Network (SRN).

Main Modification MM98 makes the Local Plan sound by ensuring it is effective and consistent with national policy, in this instance the Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development (December 2022).

We would be grateful if you could confirm receipt and acceptance of National Highways' response to the consultation on the Horsham Local Plan Main Modifications.

Should you or any others have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.

Kind regards,

Nigel De Wit MRTPI, Spatial Planner
South East Region, Operations Directorate
National Highways

Web: <http://www.nationalhighways.gov.uk>

For information about our engagement with the planning system please visit
<https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

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Appendix C

Letter sent to site promoters

Our ref:

Your ref:

Date:

Dear Sir/Madam

Re: SAXXX Name of Site

As you will be aware, the Examination Hearings for the Horsham District Local Plan 2023-2040 were paused by the government appointed planning inspector in December 2024. The inspector subsequently recommended that the plan be withdrawn in April 2025. Since then, there have been changes to Government policy and the removal of Natural England's position statement regarding Water Neutrality as has been communicated in correspondence with the planning inspector. The examination of the Local Plan therefore remains live and the latest news relating to the examination can be found on our webpage.

<https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Latest-News-from-Local-Plan-Examination>

The Council has sought information from stakeholders at various stages of the Local Plan preparation process, relating to delivery timescales and infrastructure requirement. Given the passage of time since the plan was submitted for examination in July 2024, we are continuing to assess the availability and deliverability of sites put forward to us.

We therefore are writing to you in relation to **SAXXX Name of Site** to update our evidence forming the basis of our assessment of the deliverability and potential build out trajectory of the site to inform further stages of the Local Plan Examination process.

We would therefore be grateful if you would review and answer the questions below and provide any directly relevant updated evidence to us on a non-prejudicial basis.

For any information which you send to us please could you quote our SHELAA reference number (i.e. 'SAXxx') if there is one and the site address. We will also require your contact details and the role of your organisation in relation to the site (i.e. developer / promoter).

I would be grateful if you could provide us with a response no later than **Friday 30 January 2026**. If you would like to discuss any of these points in more detail, please contact the Strategic Planning department on Strategic.Planning@horsham.gov.uk or telephone 01403 215398.

Yours sincerely,

Catherine Howe
Head of Strategic Planning

Questionnaire

1. Planning status and anticipated planning application timescales

- 1.1. For your site, when do you anticipate that a planning application/s would be submitted for housing or mixed-use development? If relevant, please refer to any planning performance agreement which may be in place, or any pre-application advice that you have received from Horsham Council. Please complete **Appendix 1**, as appropriate, with relevant dates/information.
- 1.2. Have there been any planning permissions already granted for any part of the site, or has there been any planning application submitted recently? Give details, including, where applicable, reasons why any permission has not yet been implemented.
- 1.3. What type of application is anticipated at this stage (e.g. full / outline / hybrid). For outline applications, provide an indication of when it is anticipated that detailed applications will be submitted. Also please indicate the timescales of any subsequent Reserved Matters or Discharge of Conditions applications.
- 1.4. For larger scale schemes please provide your anticipated phasing for these applications.

2. Anticipated delivery intentions, anticipated start and build out rates

- 2.1. When do you envisage the first completions to be? Please provide estimated annual completions in the "Projected Annual Completions Table" enclosed at **Appendix 2** below. An indication of tenure type (market / affordable / other) would be helpful.
- 2.2. If you are promoting a larger phased development proposal (i.e. involving more than one planning application) please give the estimated timings of the commencement of each phase and the anticipated build out in each period.
- 2.3. How do you envisage meeting your anticipated delivery rates on a consistent basis over the plan period?
- 2.4. Please provide information about whether you anticipate acting as a master developer and how many other building companies may be present on site at any one time.
- 2.5. If possible, give evidence of your delivery record, particularly on sites with similar characteristics to the site(s) you are promoting to us now, i.e. evidence of successful delivery of new housing on other sites, including rates of delivery.

3. Site ownership

- 3.1. How many landowners are there within the site being promoted for development?
- 3.2. Are there existing agreements in place with all landowners?
- 3.3. If agreements are not yet in place with all landowners, outline when it is anticipated that this may be finalised.
- 3.4. Outline if there are any other legal or ownership matters which may impact on delivery that are not covered by the above points (e.g. outstanding leasing arrangements)?

4. Infrastructure provision

- 4.1. What major infrastructure works do you anticipate would be required to support development on your site? (For example, major improvements/additions to existing highway network, schools, employment, water/sewerage treatment works, electricity substations, both on and off the site.)
- 4.2. Outline your detailed analysis to determine the location, specification and phasing of any key infrastructure. This should include anticipated timescales and where known, the amount of housing which could be delivered before or after the provision of this infrastructure.
- 4.3. Please provide information about any bids you have made, or may make, for infrastructure projects in relation to the site.

5. Water Neutrality

- 5.1. Please indicate the impact that the removal of the Water Neutrality requirement would have on your delivery timescales (i.e. would it advance or delay delivery and by how much)

Appendix 1 Submission of Application(s) – Key Dates

SA:

Date/ Other Information	Process
XX	PPA Process/ Pre-Application discussions
XX	Type of Application/ Submission Date of Application(s) (please indicate indicative dates for both outline and reserved matters, if relevant)
XX	Determination Process/ Resolution to Grant
XX	Pre-Commencement Conditions Discharged
XX	Start on Site

Appendix 2 Projected Annual Completions

SA:

Financial Year (1 st April – 31 st March)	Estimated Number of Completions			
	Total	Market	Affordable	Other
2025/26				
2026/27				
2027/28				
2028/29				
2029/30				
2030/31				
2031/32				
2032/33				
2033/34				
2034/35				
2035/36				
2036/37				
2037/38				
2038/39				
2039/40				
2040/41				
2041/42				
2042/43				
2043/44				
2044/45				
Any future years as required				
TOTAL SITE DELIVERY				

Appendix D

Indicative Local Plan Trajectory

Local Plan Trajectory - June 2026

Local Plan Trajectory - June 2026				Assumed adoption																	
Plan Period Total Supply		23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40			
		Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17			
Category	Site Name																				
DETAILED PERMISSIONS																					
Category A Strategic Sites		Site Total	Outstanding Commitment	Plan Period Supply																	
A	Land North of Horsham RM Area 1	193	0	114	73	41															
A	Land North of Horsham RM Area 2	197	108	182		24	65	93													
A	Land North of Horsham RM Area 7	221	221	221				80	80	61											
A	Land North of Horsham RM Areas 5 & 6	206	206	204					50	50	50	54									
A	Highwood, Land East A24 Worthing Road Southern Site Phase 1	208	44	44	12			26	6												
A	Highwood, Land East A24 Worthing Road Southern Site Phase 2	300	300	300				40	51	60	60	60	29								
A	Land West of Southwater (Broadacres) Phases 3.2 & 4	199	143	199	39			50	50	50	10										
A	Sub-phase 6A Kilnwood Vale Crawley Road	168	0	74	57	17															
A	Kilnwood Vale Phase 3 D, E, F, G	280	280	280				45	93	60	60	22									
A	Kilnwood Vale Neighbourhood Centre	148	148	148					20	100	28										
A	Kilnwood Vale Sub Phase 3H	69	69	69						20	49										
A	Land South of Marringdean Acres, Marringdean Road Billingshurst	51	0	34	17	17															
Category A Strategic Sites Total		2,240	1,519	1,869	198	99	65	334	350	381	228	185	29	0	0	0	0	0			

[illegible]

				Plan Period Total Supply	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
					Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17
A	Greenacres Hurston Lane Storrington*	6	1	5	-1		6														
A	Old Clayton Boarding Kennels, Storrington	41	41	41				41													
A	Lloyds Bank TSB 37 High Street Steyning	5	0	5		5															
A	Former B&W Building Elm Grove Lane Steyning	9	9	9						9											
A	Threals Farm, Thakeham	5	0	5		5															
A	Ventura House 15 St Leonards Road Horsham*	5	0	4	-1		5														
A	Page Court Livingstone Road Horsham	48	0	48		48															
A	Blakers Yard, Dial Post	12	4	12		2	6	4													
A	Maple Farm Marches Road Warnham Horsham	5	5	5					5												
A	Smith and Western 37 North Parade Horsham	20	0	20			20														
A	Land South of East Street Rusper West Sussex	6	6	6				6													
A	Croft House, High Street, Henfield	7	7	7							7										
A	Rascals Farm Shipley Road Southwater	96	96	96				20	30	30	16										
A	Land at Duckmoor, Billingshurst	83	83	83				20	40	23											
A	Land North of Downsview Avenue, Storrington	62	56	62			6	20	-30	6											
A	Land North of Rushfields High Bar Lane	25	25	25					25												
A	Land West of Stream House/North of High Bar Lane	28	28	28								10	18								
A	Field West of Cowfold, North of A272	35	35	35							25	10									
A	Fields West of Cowfold, South of A272/Field West of Cowfold, South of A272, West of Little Potters	35	35	35					25	10											
A	Land at Brook Hill	35	35	35				7	25	3											
A	Fairfield Cottages Cowfold	8	8	8				8													
A	Land North of Cowfold Road, Coolham	9	9	9					9												
A	Land West of Smock Alley, South of Little Haglands	14	14	14						5	9										
A	The Lamb Inn Lambs Green Rusper	6	6	6				6													
A	Ransoms, Station Road	8	0	8			8														
A	St Crispins Church Church Place Pulborough	6	6	6				6													
A	Woodfords Shipley Road Southwater	73	73	73					36	37											
A	Land at Glayde Farm, West of Church Lane	30	30	30	0	0					10	20									
Category A Large Permissions (5+) Total				1,441	1,106	1,431															
					103	97	122	174	357	193	132	40	68	90	55	0	0	0	0	0	0

OUTLINE PERMISSIONS

Category B Strategic Sites		Site Total	Outstanding Commitment	Plan Period Supply
B	Land North of Horsham RM Area 10	170	170	170
B	Land North of Horsham - All other phases	1,763	1,763	1,620
B	Land West of Southwater (Broadacres) Phase 5	94	94	94
B	Kilnwood Vale Sub Phase 6B	116	116	116
B	Kilnwood Vale - Phase 4	341	341	341
B	Kilnwood Vale Phase 5	381	381	381
B	Horsham Golf Park	800	800	800
Category B Strategic Sites Total		3,665	3,665	3,522

Plan Period Total Supply	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
	Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17

							70	100									
							60	60	130	130	160	160	180	180	180	180	200
						40	54										
								52	64								
											125	125	91				
														125	125	131	
									50	75	100	100	100	100	100	100	75
0	0	0	0	0	0	40	184	212	244	285	385	385	371	405	405	411	275

				Plan Period Total Supply	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
					Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17
Category B Outline Permissions (10+)		Site Total	Outstanding Commitment	Plan Period Supply																	
B	Former Novartis Site, Horsham Phase 1 & 2	206	206	206										20	50	53	55	28			
B	Former Novartis Site, Horsham Phase 3	244	244	244								20	45	45	45	55	34				
B	Land at New Place Farm, Pulborough	160	160	160				20	50	40	50										
B	Hilland House, New Road, Billingshurst	125	125	125											20	50	50	5			
B	Land to the north of Melton Drive	62	62	62					40	22											
B	Greendene, Stane Street Codmore Hill	70	70	70					24	24	22										
B	Land to the South of Furze Common	28	28	28				14	14												
B	Land at Campsfield, Linfield Close	82	82	82					41	41											
B	Billingshurst Business Park (Mixed use phase / Phase 2)	102	102	102							20	30	40	12							
B	South of Lower Broadbridge Farm	133	133	133						76	57										
B	Land North of the Rosary (West of Church Road)	81	81	81						32	49										
B	Land North of the Rise	55	55	55							10	20	15	10							
B	Land at Dunstons Farm	120	120	120								20	40	30	30						
B	The Former Pig Farm	6	6	6						4	2										
B	Land north of East Street	18	18	18						18											
B	Land at Glebe Farm	265	265	265						20	45	45	45	45	45	20					
B	Land at 508967 124469, Marringdean Road, Billingshurst	79	79	79					20	30	29										
Category B Outline Permissions (10+) Total		1,836	1,836	1,836	0	0	0	34	189	327	294	145	157	150	190	178	139	33	0	0	0

				Plan Period Total Supply	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40				
					Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17				
Made Neighbourhood Plan Category B Sites				Site Total	Outstanding Commitment	Plan Period Supply																			
B	Land West of Ashington School, Ashington	152	152	152					20	30	30	30	22	20											
B	A- Land North of Parsonage Farm, Henfield	235	235	235						40	40	40	40	35	30	10									
B	B- Land East of Wantley Hill, Henfield	25	25	25										10	15										
B	C- Land West of Backsettown, off Fumers Lane, Henfield	29	29	29						15	14														
B	D - Land South of the Bowls Club (off Fumers Mead), Henfield	9	9	9				9																	
B	Land at Saxtons Farm, Monks Gate	6	6	6										6											
B	Land behind White Horse, Maplehurst	3	3	3								3													
B	Land off Station Approach	18	18	18										18											
B	Land off Glebelands	20	20	20									10	10											
B	Land at Harwoods Garage	15	15	15						15															
B	Harwoods Car Park	9	9	9								9													
B	East of Hayes Lane, Slinfold	38	38	38					15	23															
B	Ravenscroft Allotment Site, Storrington	78	78	78							30	28	20												
B	Land at Old Mill Drive, Storrington (The Diamond)	20	20	20											20										
B	Land at the Post Office Depot, High Street Storrington	10	10	10													10								
B	Thakeham Tiles, Rock Road Storrington	108	108	108										40	40	28									
B	Land East of Pound Lane Upper Beeding	35	35	35										10	25										
B	Oxcroft Farm, Small Dole	28	28	28								4	5	14	5										
B	Land at Greenfields, Henfield Road, Upper Beeding	10	10	10										10											
B	Riverside Caravan Park, Upper Beeding	9	9	9											9										
B	North of Freeman Road, Warnham	59	59	59					31	19										9					
Made Neighbourhood Plan Category B Sites Total				916	916	916			0	0	0	9	66	142	114	114	97	173	144	38	10	0	0	9	0

				Plan Period Total Supply	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
					Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17
B	Land west of Shoreham Road	40	40	40						25	15										
B	Land South of Northlands Lane (other half of STO1)	50	50	50							20	30									
B	Land at Rock Road	55	55	55												10	20	25			
B	Land South of Bell Road	20	20	20									5	15							
B	Land at Hatches Estate	15	15	15						5	10										
Main Modification	Land South of New House Farm	120	120	120								30	50	40							
Main Modification	Land East of Henfield	450	450	450								50	70	65	65	65	65	70			
Main Modification	Land at Bax Close	30	30	30						20	10										
Main Modification	Land at Cedar Cottage	20	20	20					12	8											
Main Modification	Old Reservoir Farm	80	80	80							20	40	20								
Main Modification	Land rear of Two Mile Ash Road Barns Green	10	10	10						5	5										
Main Modification	Land at Dunstons	80	80	80									15	25	25	15					
Main Modification	Highdown Nurseries, off Shoreham Road	10	10	10					10												
Main Modification	Land to the West of Church Street	15	15	15					15												
Main Modification	Land South of Hogs Wood, Shipley	100	100	100							50	50									
Main Modification	Land off Fryern Road	50	50	50					15	20	15										
Main Modification	Land at Sandygate	8	8	8					3	5											
Main Modification	Land East of Cowfold	100	100	100					10	20	20	20	20	10							
Main Modification	Land north of Fummers Lane	191	191	191						10	25	25	25	25	25	25	25	6			
Main Modification	West of Kilnwood Vale	350	350	350							10	70	60	60	60	60	30				
Main Modification	Northern Cluster - Ashington Giebe Land	450	450	450								25	35	35	45	45	50	50	50	50	65
Submission Local Plan Draft Settlement Allocations Total		2,982	2,982	2,982	0	0	0	0	151	283	392	475	415	320	220	220	190	151	50	50	65

			Plan Period Total Supply	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
				Comps	Comps	Comps	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Y12	Y13	Y14	Y15	Y16	Y17
Local Plan Supply																				
Completions to Date			1,007	452	320	235	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Commitments (Made Allocations/ Permissions)			9,111	0	0	0	676	1,032	1109	952	696	595	618	774	601	520	438	405	420	275
Strategic Site Allocations			6,375	0	0	0	0	50	75	115	270	455	635	660	720	720	695	695	675	610
Smaller Site Allocations			2,962	0	0	0	0	151	283	392	475	415	320	220	220	190	151	50	50	65
Windfalls			1,440	0	0	0	0	0	120	120	120	120	120	120	120	120	120	120	120	120
Total HDC Supply			20,915	452	320	235	676	1,233	1,587	1,579	1,561	1,585	1,693	1,774	1,661	1,550	1,404	1,270	1,265	1,070
Local Plan Requirement	Requirement	Requirement %																		
HDC	14,071	75%	14,071	340	241	177	375	375	827	827	827	827	827	1,204	1,204	1,204	1,204	1,204	1,204	1,204
CBC	3,757	20%	3,754	91	64	47	100	100	221	221	221	221	221	321	321	321	321	321	321	321
Adur	340	2%	339	8	6	4	9	9	20	20	20	20	20	29	29	29	29	29	29	29
Worthing	544	3%	548	13	9	7	15	15	32	32	32	32	32	47	47	47	47	47	47	47
Requirement	18,712	100%	18,712	452	320	235	499	499	1,100	1,100	1,100	1,100	1,100	1,601	1,601	1,601	1,601	1,601	1,601	1,601
Annual Proposed Requirement			18,712	452	320	235	499	499	1,100	1,100	1,100	1,100	1,100	1,601	1,601	1,601	1,601	1,601	1,601	1,601
Supply Headroom			2,203	0	0	0	177	734	487	479	461	485	593	173	60	-51	-197	-331	-336	-531
Supply Headroom %			12%	0%	0%	0%	35%	147%	44%	44%	42%	44%	54%	11%	4%	-3%	-12%	-21%	-21%	-33%
Annualised Supply				1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230	1,230
Annualised Requirement				1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101	1,101
Rolling Requirement				452	772	1,007	1,506	2,005	3,105	4,205	5,305	6,405	7,505	9,106	10,707	12,308	13,909	15,510	17,111	18,712
5YHLS																				
Rolling 5YHLS Target				3,433	4,298	4,899	5,500	6,001	6,502	7,003	7,504	8,005	8,005	8,005	8,005	-	-	-	-	-
Rolling 5YHLS Target + 5% Buffer				3,605	4,513	5,144	5,775	6,301	6,827	7,353	7,879	8,405	8,405	8,405	8,405	-	-	-	-	-
Rolling 5YHLS Supply				5,310	6,636	7,545	8,005	8,192	8,274	8,263	8,082	7,859	7,150	6,559	-	-	-	-	-	-
Rolling 5YHLS				7.4	7.4	7.3	6.9	6.5	6.1	5.6	5.1	4.6	4.3	3.9	-	-	-	-	-	-