

HORSHAM DISTRICT LOCAL PLAN 2023–2040: EXAMINATION IN PUBLIC

WRITTEN HEARING STATEMENT

Submitted on behalf of: Avril Wood

Representor ID: 66630465

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MATTERS OF REGISTRATION

- **EXAMINATION STAGE:** Stage 2 Independent Hearings (October 2026)
 - **HEARING MATTER:** Matter 6: Strategic Site Development (Session 6d: Land at Adversane)
 - **SPECIFIC POLICY OBJECTED TO:** Strategic Policy HA(NP1): Land at Adversane (Kingswood)
 - **LOCAL PLAN REFERENCE:** Main Modification MM227 (Site SA597)
 - **PROPOSED DEVELOPMENT:** 3,200 Residential Dwellings and Associated Infrastructure
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TESTS OF SOUNDNESS CHALLENGE

This statement demonstrates that the strategic allocation of Site SA597 under Policy HA(NP1) fails the baseline tests of Soundness outlined in national planning policy. The allocation is:

1. **Not Justified:** The selection relies on contradictory infrastructure reports, outdated traffic modelling, and localized environmental assessments that are explicitly disproved by data from Statutory Authorities, NHS Sussex, and Natural England.
 2. **Not Viable:** Critical transport links, road networks, and essential connectivity upgrades face physical, structural, and legal constraints that make the project unrealistic to build.
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DOCUMENT PROVISION DECLARATION

- **Word Count Compliance:** The core text of this statement stands at 2,822 words, complying strictly with the 3,000-word limit mandated by the Inspector's Guidance Note.
- **Evidence Referencing:** In accordance with Paragraph 48 of the Guidance Note, all cross-referenced background evidence is clearly identified using unique Examination Library reference codes and page-by-page footnotes. No separate appendices are attached, keeping this submission focused and compact.

MAIN HEARING STATEMENT

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1. INTRODUCTION

- 1.1** This statement challenges the strategic allocation of Site SA597 (3,200 dwellings) introduced by Horsham District Council (hereafter HDC), via the July 2026 Main Modifications. The infrastructure, environmental, economic, and healthcare assessments used by HDC to justify this standalone settlement are contradictory and unsupported by evidence. The allocation fails the National Planning Policy Framework (NPPF) tests of soundness because it is neither justified by evidence nor realistic to build.

2. HIGHWAYS AND ACCESS

- 2.1** The allocation of 3,200 homes directly on the A29 corridor is unrealistic to build due to critical, pre-existing physical constraints formally identified by statutory experts.¹
- 2.2** West Sussex County Council (WSCC), as the Statutory Highways Authority, maintains a holding objection to the inclusion of Site SA597.² WSCC confirms that the severe traffic impacts generated by a 3,200-home settlement cannot be resolved due to two structural bottlenecks sitting approx. 650 metres apart in Pulborough: the A29 Church Hill landslip zone to the south, and Pigeon Gate Bridge to the north. At Pigeon Gate Bridge, acute width constraints routinely prevent large vehicles from passing safely, forcing them to overhang pavements and placing pedestrians at immediate physical risk. At Church Hill, physical width restrictions mean it is highly challenging to safely accommodate two-way traffic alongside a compliant footpath, leading local working groups to prefer a permanent single-lane signal system to secure a safe walking route.³
- 2.3** HDC's Transport Assessment relies on an outdated software model that completely omits the cumulative traffic from approved housing projects at Greendene and New Place Nurseries. Planning officers conceded during public

¹ **HDC's own Strategic Transport Assessment (Regulation 19 Evidence Base, Document Reference: TR01)** previously concluded that "this site is geographically less well connected to the settlements of Horsham, Crawley and the south coast." *The physical geography has not changed since this assessment was published, while network capacity constraints on the A29 and associated rail networks have actively deteriorated.*

² **WSCC Highways Authority Formal Consultation Response to the HDC Local Plan Main Modifications MM227 (August 2026)** maintaining a holding objection based on unmitigable highway safety constraints, topographical boundaries, and active landslip histories at the A29 Church Hill chokepoint in Pulborough.

³ **Pulborough Parish Council Transport and Infrastructure Options (Version 5.0, July 2025, Ref: PUL023/PUL020)**, produced with HDC and WSCC Highways officers, documenting the severe physical width constraints and pedestrian safety risks connecting the Church Hill landslip zone and Pigeon Gate Bridge bottlenecks.

hearings (Matter 6) that they failed to update the software to include these active commitments.⁴

- 2.4** This modelling failure is exposed by the deliberate exclusion of known narrow diversion routes, specifically New Place Road and Rectory Lane, because consultants admitted including them would disrupt the software's calibration. Because New Place Road joins the A29 directly between the Church Hill and Pigeon Gate Bridge pinch points, it acts as the primary release valve for network congestion. Data shows that adjacent approved developments will dump over 136,000 annual vehicle movements onto this unmodelled residential rat-run.⁵ WSCC's demand for emergency traffic monitoring on New Place Road under Policy HA(NP1) Criterion 6f confirms that the statutory authority views this diversion risk as a live, unresolved threat.⁶
- 2.5** HDC's Overview and Scrutiny Committee records show that strategic progression of Site SA597 depends on a complex rail crossing scheme. Predicated on safety to force a level crossing closure, this layout creates a convoluted diversion where B2133 traffic must turn right onto the A29, loop left through the estate, cross a new railway bridge, and twist back northwards. While recent versions attempt to restrict this loop to the boundary edge, the HDC Strategic Site Assessment (Page 10) claims this route would *"form the central thoroughfare of the new settlement,"* justifying local safety concerns. Because Network Rail's policy enforces a mandatory 50% value-share demand for infrastructure access, this crossing introduces an unbudgeted cost, threatening the site's financial viability.
- 2.6** Planning officers conceded that no framework agreement exists with Network Rail to build this bridge.⁷ Because Site SA597 is entirely severed by the railway line, the absence of a confirmed agreement leaves overall site practicality and financial validity unproven. While technical experts are better placed to debate the precise viability calculations, practically, major rail infrastructure challenges, combined with directing thousands of daily vehicle movements into a vulnerable bottleneck, mean the allocation fails fundamental planning requirements for viability and sustainability.

⁴ **HDC Strategic Planning & Scrutiny Records: July 2026 Addendum & Officer Testimonies** confirming officer concessions under Matter 6 examination regarding outdated strategic highway modelling software.

⁵ **Horsham Local Plan 2040 Transport Assessment (Stantec, June 2026), §5.3.4** regarding software network exclusions.

⁶ **Cross-referenced against New Place Farm, Pulborough Transport Assessment (DN/NES/17334-07b, October 2021) — §5.2.3, Table 7, Table 8**, verifying approximately 136,200 annual vehicle movements loaded onto the exact residential link connecting the two A29 pinch points.

⁷ **HDC Overview & Scrutiny Committee Minutes (July 2026)** regarding the absence of a legally binding bridge infrastructure agreement with Network Rail for Site SA597. Cross-referenced against the official **Network Rail Infrastructure Limited Shared Value Policy (April 2022)**, which sets out the mandatory 50% value-share framework for third-party commercial access.

3. SUSTAINABLE TRANSPORT ANALYSIS

- 3.1** HDC's assertion that this site offers viable sustainable travel choices due to its proximity to Billingshurst railway station ignores physical network realities. While Horsham acts as a resilient rail hub, the segment connecting Horsham to the south coast consists of a single line north and a single line south corridor.⁸
- 3.2** This rural branch segment suffers from capacity bottlenecks, regular timetable disruptions, and total line closures. As tracked under Examination Library Code HDCJB13, the Sustainability Appraisal assumes an unrealistic switch from private cars to public transport. Network Rail's current strategy confirms that this branch segment has no strategic funding allocations for upgrades within the active plan period.⁹ Future residents will inevitably default to private vehicles, directly worsening traffic volumes on the A29.¹⁰

4. INFRASTRUCTURE IMPACT (HEALTHCARE)

- 4.1 Health and Wellbeing Assessment Flaws:** The July 2026 Sustainability Appraisal (SA) Addendum (HDCJB13) scores Site SA597 "Favourable" for Health and Wellbeing. This assessment is flawed because it relies almost entirely on a promised on-site GP surgery. A primary care surgery cannot treat acute, life-threatening emergencies, or provide routine secondary hospital care.
- 4.2 Acute Medical Constraints and Social Inequality:** The site is isolated from designated acute medical facilities, creating travel challenges for both emergency care and routine treatments:
- **St Richard's Hospital (Chichester):** Roughly 19 miles southwest via the A29. This route forces emergency and routine travel through the A29/A283 roundabouts, which HDC's own data admits are already operating overcapacity. It is also severely restricted by the Church Hill chokepoint and subject to winter flooding at Swan Corner.¹¹ The river regularly floods this specific section of the road, a fact I can verify, as last December we were forced to make a lengthy detour to reach a hospital appointment, due to the route being impassable.

⁸ **Network Rail Sussex Route Strategy Representations, Representation ID: 13399989** confirming the absence of strategic funding allocations for capacity upgrades on the Arun Valley rural branch segment within the active plan period.

⁹ **Network Rail Technical Transport Reviews (2026)** detailing severe capacity bottlenecks, timetable disruptions, and structural line constraints on the single-line branch corridors serving Billingshurst.

¹⁰ **Horsham Local Plan 2040 Transport Assessment (Stantec, June 2026)**, §6.4.7 and Table 4-2, documenting that Site SA597 tracks the lowest projected car-trip reduction (just 4%) of any strategic site in the district, directly undermining the Sustainability Appraisal's transport assumptions.

¹¹ **Environment Agency Flood Warning Records for the River Arun (Pulborough area)**, confirming severe inundation and extensive flooding historically affecting the A29 corridor at Swan Corner.

- **Worthing Hospital:** Roughly 15 miles south via the rural B2133 and the heavily congested A24 corridor.
- 4.3** Heavy traffic on both the A29 and A24 delays journey times, compromising critical emergency response times¹² and placing an unsustainable burden on residents accessing outpatient appointments, maternity care, and scheduled procedures.
- 4.4 Social Inequality and Accessibility Gaps:** This geographic isolation creates an inequality gap that conflicts with national requirements for inclusive development. Lower-income families, the elderly, and residents without private transport face an insurmountable barrier navigating a 30-to-40-mile round trip on congested rural roads for routine medical care.¹³
- 4.5 Emergency Response Vulnerabilities:** SECamb data confirms that rural Category 2 emergency responses already miss national targets due to distant primary hubs.¹⁴ Adding 3,200 homes will challenge ambulance cover and risk lives across the already-stretched Pulborough and Billingshurst catchment.
- 4.6 Required Baseline Measures Versus Community Benefit:** The proposed on-site GP surgery is a requirement, simply to prevent the collapse of primary care. With the NHS Sussex Integrated Care Board recording patient-to-GP ratios well above national averages, surgery lists are already overcapacity.¹⁵ The allocation provides no additional medical safety net or benefit to the existing community. Labelling a rescue measure as an inherent sustainability 'benefit' is misleading.
- 4.7 Conflict with National Planning Policy Frameworks:** Consequently, HDC's strategic allocation directly conflicts with national planning policies governing public safety, accessible development, and emergency service capacity under both the legacy and newly revised frameworks.¹⁶

¹² **NHS England, Ambulance Quality Indicators and Hospital Handover Data (2025/2026).** Used to verify widespread network constraints and extended offload waiting times at St Richard's and Worthing emergency departments.

¹³ This isolation directly breaches **Paragraph 96(b) of the legacy December 2024 NPPF and Policy CW1(1)(a) of the revised August 2026 Framework**, which strictly mandate that strategic developments must deliver inclusive, safe, and accessible communities that do not undermine the quality of life for vulnerable groups.

¹⁴ **South East Coast Ambulance Service (SECamb), Regional Performance Data (2025/2026).** Used to verify that rural Category 2 emergency response times routinely exceed national target windows across the Pulborough and Billingshurst catchment.

¹⁵ **NHS Sussex Integrated Care Board (ICB) Workforce Data (2025/2026)**, confirming that patient-to-GP ratios across rural Horsham practices consistently exceed national averages, outstripping standard NHS infrastructure planning benchmarks.

¹⁶ The proposal breaches **Paragraph 192** (compromising existing blue-light infrastructure capacity), **Paragraph 116(c)** (failing to guarantee efficient access for emergency vehicles), and **Paragraph 96(c)** (failing to integrate housing with functional health networks) of the **legacy December 2024 NPPF**. It simultaneously fails **Policy PM6** (requiring strategic choices to be supported by proven infrastructure capacity) and **Policy CW1(1)** (mandating secure, reliable transport and health routes rather than speculative assumptions) of the **revised August 2026 NPPF**.

5. EDUCATION PROVISION

- 5.1** HDC states in the July 2026 Addendum (HDCJB13) that the 3,200-home Adversane allocation is justified because it will provide school places where they are most needed. This premise is incorrect and lacks an objective basis.
- 5.2** To justify rejecting alternative development options, HDC's documentation asserts that WSCC identified an immediate, unmet need for school places in the west of the district. This geographic premise is incorrect. The official WSCC 2026 Planning School Places Report explicitly contradicts HDC, showing that school demand is driven by the district's main population and economic hubs.¹⁷ WSCC indicates that new secondary provision will serve the wider Billingshurst, Horsham, and Crawley catchments, meaning a central allocation adjacent to the main Horsham hub would better use existing infrastructure and reduce cross-district school travel.
- 5.3** The proposed secondary school within Site SA597 is not a response to an existing shortage.¹⁸ Instead, it is an on-site rescue measure required to absorb the demand generated mostly by the development itself. Basing a major strategic allocation on a false geographic narrative that is inconsistent with the Education Authority's data, makes this selection unjustified.

6. ECONOMIC VIABILITY

- 6.1** HDC's assumption that Site SA597 will become an economically self-contained community with local employment options is contradicted by current market evidence and recent commercial property decisions in the district:¹⁹
- **The Toat Café Site Precedent:** Located less than a mile south of Site SA597 on the A29, this 6.5-acre site was formally allocated in the Pulborough Neighbourhood Plan²⁰ for commercial and industrial use. However, the market rejected it, attracting no commercial demand.²¹ The landowners were forced to

¹⁷ **West Sussex County Council (WSCC) Planning School Places Document (2026 Update)**, confirming that local secondary school demand is driven by the district's main hubs and population centres, directly disproving HDC's assertions regarding a westward-driven infrastructure shortfall.

¹⁸ **HDC Strategic Site Assessment Background Papers (Document Ref: HDCJB14b)**, detailing HDC's comparative evaluation of alternative strategic options and its baseline justification for rejecting competing locations.

¹⁹ **HDC Employment Land Review (ELR) Updates**, reflecting the low levels of market interest and slow take-up of commercial floor space across the district's rural corridors.

²⁰ **Pulborough Neighbourhood Plan (Made 2021), Commercial and Industrial Allocation Policy**, regarding the exhaustive marketing and subsequent market rejection of the 6.5-acre Toat Café site on the A29. Cross-referenced against **HDC Planning Record and History for the Toat Café Site**, documenting the formal application history and final withdrawal of commercial development proposals.

²¹ **WSCC and HDC Joint Development Brief (The Former Novartis Site, Horsham)**, regarding the 6-acre (25,000m²) dedicated enterprise zone which failed to attract commercial market interest.

abandon commercial development altogether, proving there is no business appetite for this corridor.

- **The Novartis Precedent (Horsham):** HDC and West Sussex County Council designated 6 acres (25,000 m²) of the highly connected urban Novartis brownfield site in Horsham for commercial investment.²² Despite its prime location, the site attracted no commercial market interest and has since been approved for residential development.

6.2 Given that established urban hubs struggle to attract commercial employers, this isolated greenfield site is highly unlikely to achieve economic self-containment. Without practical local employment options, the allocation will operate as a car-dependent commuter settlement, worsening existing traffic pressures on the A29.

7. ENVIRONMENTAL AND LAND IMPACTS

7.1 The July 2026 Habitats Regulations Assessment (HRA) Addendum (HDCJB12)²³ contradicts the environmental protections established in HDC's full 2023 HRA.

7.2 The 2023 HRA treated development at Adversane with caution, due to the risk of harming protected Barbastelle bat foraging lines linked to The Mens SAC and Ebernoe Common SAC. The July 2026 Update reverses this position to conclude there are "no adverse effects", by delaying detailed tracking studies to a future planning application stage. This approach is contrary to the precautionary principle, which requires environmental impacts to be fully understood before a site is allocated in a Local Plan. This delay is also fundamentally incompatible with Natural England's August 2026 consultation response, which reminds HDC that Site MM227 sits directly within a protected Barbastelle Core Sustainance Zone requiring landscape-scale integrity.²⁴

7.3 Furthermore, the updated HRA dismisses this 3,200-home area as unimportant for local birdlife, describing it as a "fragmented field network" (Document HDCJB12a). However, these green spaces provide a buffer feeding directly into the protected Pulborough Brooks (Arun Valley SPA/Ramsar) wetland ecosystem.²⁵ Evaluating these local fields on a standalone basis, fails to adequately address the cumulative "in combination" effects of this allocation alongside concurrent

²² **HDC Planning Permission Ref: DC/18/2687**, confirming the formal conversion and approval of the Novartis commercial enterprise zone into residential development.

²³ **Horsham Local Plan Modifications Habitats Regulations Assessment (Document Ref: HDCJB12)**, tracking HDC's revised environmental protections and its decision to delay detailed wildlife surveys until a later stage.

²⁴ **Natural England Formal Consultation Response (August 2026 Submission)**, confirming Site MM227's location within the protected Barbastelle Core Sustainance Zone and objecting to the deferral of landscape-scale surveys.

²⁵ **Pulborough Brooks & Arun Valley SPA/Ramsar Technical Mapping Document (Ref: HDCJB12a)**, containing HDC's assessment of local greenfield buffers as a fragmented field network.

expansions at Billingshurst; this progressive urbanisation of the rural gap introduces regional landscape-scale fragmentation that threatens both SAC bat populations and the broader SPA wetland ecosystem.

- 7.4 Loss of Unsurveyed, High-Quality Agricultural Land:** The allocation will result in the permanent loss of hundreds of acres of productive greenfield land, provisionally mapped as Grade 3. This conflicts with national planning policy under Paragraph 180(b) legacy December 2024 framework and Policy NE1(1)(b) of the revised August 2026 update (subject to the transitional plan-making criteria set out in 2026 NPPF Annex A)—which requires councils to protect the Best and Most Versatile farmland and prioritise poorer quality land first.
- 7.5** Crucially, neither HDC nor the developer has carried out on-site soil testing to see how much of this land is protected, high-quality farming soil. Allocating a 3,200-home site without this data bypasses local policy and standard national rules. Because HDC has not verified whether this site destroys vital food-producing land, the strategic selection lacks a firm, objective evidence base.

8. CONCLUSION

- 8.1** In conclusion, it is respectfully submitted that Strategic Policy HA(NP1) under Main Modification MM227 does not currently meet the tests of soundness. Due to the critical evidence gaps identified across transport practicalities, agricultural land classification, and landscape-scale ecological impacts, the allocation cannot be considered fully justified or consistent with national policy.
- 8.2** HDC's reliance on deferred survey data, outdated transport models, and localised environmental assessments means that the evidence lacks the required robustness for a strategic allocation of this scale. These systemic issues cannot easily be resolved through minor text modifications.
- 8.3** The Inspector is therefore respectfully invited to conclude that Main Modification MM227 is unsound, and to recommend the deletion of Site SA597. As currently drafted, the plan's missing evidence and rushed decisions leave it open to a formal legal challenge under national regulations.