



Examination of the
Horsham District Local Plan 2023-2040

MATTER 5: THE SPATIAL STRATEGY AND SITE SELECTION

HEARING STATEMENT

Prepared by Blue Fox Planning Ltd on behalf of:

Richborough

Representation Numbers: 1207902, 1211480 and
1211486

September 2026



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1. Introduction

- 1.1 This statement responds to Matter 5 of the Inspector's hearing agenda (IDJB07). Paragraph 20 of the Inspector's Guidance Note (IDJB06) confirms that the spatial-strategy hearings will consider the proposed distribution of development in relation to housing need, the settlement hierarchy, transport networks, access to employment, social and community facilities, the environment and deliverability. This statement addresses those matters under the three corresponding headings in the hearing agenda: spatial distribution, constraints and housing delivery.
- 1.2 The statement should be read alongside Richborough's earlier examination statements and its August 2026 representations on the proposed Main Modifications. It is intentionally focused on the spatial strategy. Matters specific to the detailed soundness and delivery of Strategic Policy HA4 are addressed separately under Matter 6c.
- 1.3 Richborough supports the proposed spatial strategy, including the enlarged Land East of Billingshurst allocation in MM226. The strategy is a positive and proportionate response to the Inspector's preliminary findings, the removal of the former water-neutrality constraint and the need to provide for local housing need, a share of Crawley's unmet need and a reasonable contribution towards unmet need arising from the south coast.
- 1.4 Richborough controls Land off Coneyhurst Road, south of the railway, which MM226 proposes to include within the enlarged HA4 allocation. As promoter of the additional land, Richborough is directly able to assist the examination of whether the proposed distribution of development is justified, effective and deliverable.
- 1.5 The Main Modifications provide a diversified supply comprising strategic allocations, smaller and medium-sized sites, existing commitments and windfalls. That is important both spatially and for delivery. It directs substantial growth towards higher-order settlements capable of supporting homes, services and infrastructure, while avoiding excessive reliance on a single site, settlement or delivery source.
- 1.6 Billingshurst makes an appropriate contribution within that wider strategy. It is a second-tier settlement with a railway station, employment, shops, schools and community facilities and is better placed to accommodate strategic growth than many lower-order rural settlements. The increased provision at Billingshurst strengthens the supply and resilience of the Plan while supporting a planned and sustainable pattern of development.
- 1.7 Richborough does not invite the Inspector to compare HA4 with omission sites. The Guidance Note (IDJB06) confirms that such comparisons will not form part of the hearings. Nor does this statement seek to reopen the housing requirement or stepped trajectory. The relevant question is whether the proposed distribution, including the

additional land at Billingshurst, is an appropriate and sound strategy. Richborough considers that it is.

- 1.8 The applicable national policy is the September 2023 NPPF. Paragraph 35 requires the Plan to be positively prepared, justified, effective and consistent with national policy. Those tests inform the submissions below. The test of justification is whether this is an appropriate strategy, taking account of reasonable alternatives and based on proportionate evidence; it does not require proof that no alternative could be pursued.

2. MATTER 5: The Spatial Strategy and site selection

Matter 5a: Session for site promoters / developers / agents

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

Housing need in the District and in adjacent districts

- 2.1 The Sustainability Appraisal Addendum (SA Addendum) (HDCJB13) explains that the proposed requirement of 18,712 homes comprises local housing need of 14,071 homes, 3,757 homes representing half of Crawley's unmet need and 884 homes towards unmet need from the south coast. The proposed supply of 20,915 homes provides necessary headroom above that requirement. This is a positively prepared response to the Inspector's letter of 5 May 2026 and provides contingency against unforeseen delay.
- 2.2 The Main Modifications increase provision across a range of sustainable settlements and broaden the portfolio of allocated sites. The additional growth at Billingshurst forms an important component of that response. It is supported by actively promoted and available land and is capable of contributing within the Plan period. The detailed capacity, masterplanning and infrastructure arrangements for HA4 are addressed under Matter 6c.

The settlement hierarchy and settlement character

- 2.3 The SA Addendum identifies a clear case for directing a significant proportion of growth to Horsham and the District's small towns and larger villages. Billingshurst is a second-tier settlement with an important service-centre role, established employment, education, community facilities and rail connections. It is therefore better equipped than lower-order rural settlements to accommodate strategic growth. The increased provision at Billingshurst forms part of a wider District-wide strategy that directs development towards the more sustainable settlements, supports the delivery of homes and infrastructure and reduces reliance on dispersed development in less accessible locations. The detailed form and delivery of Strategic Policy HA4 are addressed separately under Matter 6c.
- 2.4 Expansion east of Billingshurst is consistent with the settlement hierarchy and represents a planned extension rather than dispersed development. The enlarged allocation also restores the broad two-parcel growth location identified by the Council at Regulation 18 stage in February 2020. The southern land is therefore not a newly identified or untested development option but has formed part of the Council's strategic consideration of growth east of Billingshurst throughout the Plan process. The Site Assessment Report Update (HDCJB14b) assesses the land north and south of

the railway together. It records the southern parcel as approximately 23.5 hectares, bounded by the railway and in part by the A272, with the existing settlement to the west and ancient woodland to the south. The SA Addendum describes the southern parcel as well contained and under single ownership, while recognising environmental features and constraints that must inform its layout.

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

- 2.5 Billingshurst provides established employment, retail, education, health, leisure and community facilities. Development at HA4 can support and enhance those services and secure new facilities required by the policy, including education and community infrastructure.
- 2.6 Billingshurst benefits from an established railway station, and HA4 is particularly well placed to secure opportunities for walking, wheeling, cycling and public-transport improvements. These characteristics support a genuine choice of travel modes and reinforce the suitability of the selected eastern growth location. Detailed access, active-travel and railway-crossing arrangements relating to HA4 are addressed under Matter 6c.

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

- 2.7 The proposed distribution responds appropriately to the differing transport characteristics of the District by directing substantial growth towards settlements with stronger connections to employment, services and public transport. Billingshurst benefits from access to the A272 and an established railway station and therefore has stronger strategic connectivity than many lower-order rural settlements.
- 2.8 The updated transport evidence assesses the preferred growth scenario and its cumulative effects. The Main Modifications also provide for site-specific mitigation, sustainable-transport improvements and active-travel connections. These measures demonstrate that the transport implications of the proposed distribution can be appropriately addressed through strategic infrastructure planning and the development-management process. Detailed access, crossing and infrastructure-apportionment matters relating to HA4 are addressed under Matter 6c.
- 2.9 The Main Modifications representations provide further support for the strategy. Bellway and Crest support the increased housing provision and recognise Billingshurst's rail accessibility, while Network Rail considers MM226 sound. Objectors promoting Land West of Billingshurst challenge the comparative assessment and railway-crossing requirements. However, the SA tests six growth scenarios, the Site Assessment considers the northern and southern HA4 parcels both individually and together, and the Inspector has excluded detailed omission-site comparisons from

these hearings. Those objections do not demonstrate that the selected distribution falls outside the range of reasonable planning judgments available to the Council.

ii. **Constraints: whether the distribution of development is sound having regard to:**
landscape and countryside • heritage assets and their settings • habitats and biodiversity • flood risk and climate change mitigation • services including water and sewerage

- 2.10 Horsham District is subject to significant and overlapping environmental and infrastructure constraints. A sound spatial strategy cannot avoid every effect; it must reflect an appraisal of reasonable alternatives, direct growth towards suitable and sustainable locations and provide an effective framework for avoiding, reducing and mitigating adverse effects.
- 2.11 The SA Addendum undertakes that strategic assessment. It considers the reasonable growth scenarios and identifies both their contribution to housing provision and their potential effects on landscape, heritage, biodiversity, flood risk, climate change and infrastructure. The preferred distribution performs strongly against the housing objectives while recognising where site-specific assessment and mitigation will be required.
- 2.12 The distribution directs substantial growth towards existing higher-order settlements while avoiding reliance on less accessible and more dispersed locations. Landscape, heritage and ecological sensitivities have informed the selection and assessment of the proposed allocations. The Site Assessment Report Update, HRA and supporting environmental evidence do not identify an overriding constraint that prevents the proposed distribution from being delivered, subject to the safeguards contained in the Plan and project-level assessment.
- 2.13 Flood risk has been considered through the SA and the Council's Flood Risk Sequential and Exception Tests. The proposed distribution does not depend upon development being located within areas at greatest risk where sequential layouts and appropriate mitigation can be achieved. The Environment Agency considers the relevant Main Modifications legally compliant and sound, while identifying matters to be addressed through policy, layout and mitigation.
- 2.14 Infrastructure evidence similarly demonstrates that water, wastewater and energy requirements can be accommodated through coordinated reinforcement and appropriate phasing. Water neutrality no longer prevents the Plan from meeting identified needs, while Southern Water confirms that limited network capacity is not itself a constraint where occupation is aligned with the necessary improvements.
- 2.15 The recognition of constraints, together with the policy requirements and infrastructure mechanisms available to address them, supports rather than undermines the spatial strategy. The evidence demonstrates that the proposed

distribution has been selected with an appropriate understanding of its effects and is capable of being delivered with proportionate mitigation. The detailed environmental, flood-risk, utility and infrastructure considerations relating to HA4 are addressed under Matter 6c.

iii. **Housing delivery: whether the range of sizes and types of site would ensure that: different housing needs and aspirations would be adequately met • enough homes would come forward at the right time during the plan period to meet the housing requirement.**

- 2.16 The proposed portfolio comprises strategic allocations, smaller and medium-sized sites, existing commitments and windfall development. This diversity supports delivery throughout the Plan period: smaller sites and commitments can contribute earlier, while strategic sites provide sustained housing delivery and the infrastructure necessary to support longer-term growth. The strategy therefore avoids excessive reliance on a single site, settlement or type of development.
- 2.17 The range and scale of the proposed sites also provide flexibility to meet different housing needs and aspirations. Plan policies require an appropriate mix of market and affordable housing and provision responsive to families, older people and Gypsy and Traveller needs. Detailed tenure, type and location will properly be determined through site-specific masterplanning and planning applications.
- 2.18 The Housing Delivery Study assesses the anticipated commencement and build-out of the strategic allocations and supports the Council's trajectory. Its assumptions are appropriately cautious, allowing for planning lead-in times, infrastructure delivery and market absorption. The availability of multiple sites and delivery outlets provides resilience if individual schemes progress more slowly or quickly than anticipated.
- 2.19 HA4 provides a specific example of the resilience offered by the proposed portfolio. The Housing Delivery Study identifies a strong prospect of at least 1,000 homes being delivered at HA4 within the Plan period, while the promoters' combined programme anticipates delivery of the policy minimum by 2032/33. The Joint Position Statement confirms active promotion, coordinated delivery planning and the ability of the separate land interests to progress within an overarching framework. The promoters' programme therefore provides headroom against the Council's more cautious trajectory without fixing the ultimate capacity or distribution between parcels.
- 2.20 The evidence identifies infrastructure and utility requirements associated with the strategic allocations but does not demonstrate that these prevent delivery within the Plan period. The IDP, Housing Delivery Study, statutory-consultee representations and promoter evidence provide mechanisms for coordinating reinforcement, mitigation, funding and delivery triggers. Detailed matters concerning HA4's crossing, infrastructure apportionment, separate applications and masterplanning arrangements are addressed under Matter 6c.

- 2.21 Taken as a whole, the portfolio provides a credible balance between early delivery, sustained strategic growth, market choice and infrastructure provision. It is sufficiently varied and flexible to meet different housing needs and to deliver the housing requirement throughout the Plan period.

iv. Assessment against the soundness tests

- 2.22 **Positively prepared.** The strategy seeks to meet the District's identified housing need, a substantial share of Crawley's unmet need and a contribution towards unmet need arising from the south coast, with appropriate headroom. It directs growth towards the more sustainable settlements and aligns housing delivery with the transport, education, utility and community infrastructure identified through the evidence base.
- 2.23 **Justified.** The SA Addendum assesses reasonable growth scenarios and the Site Assessment Report Update considers the suitability of the additional and amended allocations. Taken together with the transport, infrastructure, environmental and delivery evidence, this provides a proportionate basis for the selected distribution. The preference of some representors for alternative omission sites does not demonstrate that the Council's chosen strategy falls outside the range of reasonable planning judgments available to it.
- 2.24 **Effective.** The strategy comprises a diverse portfolio of strategic allocations, smaller and medium-sized sites, commitments and windfall development. The Housing Delivery Study assesses their anticipated commencement and build-out and supports delivery of the housing requirement within the Plan period. HA4 provides additional resilience: its promoters' combined programme anticipates delivery of at least 1,000 homes by 2032/33, while the Joint Position Statement demonstrates coordinated delivery planning and effective joint working.
- 2.25 **Consistent with national policy.** The strategy directs planned growth towards settlements with access to employment, services, public transport and existing infrastructure, while providing for active travel, housing choice, environmental mitigation and necessary infrastructure. It therefore promotes a sustainable pattern of development in accordance with the September 2023 NPPF.
- 2.26 The proposed spatial distribution and site-selection approach meet the four tests of soundness in paragraph 35 of the September 2023 NPPF. The focused policy and delivery matters relating specifically to HA4 are addressed separately under Matter 6c.