

Examination of the Horsham District Local Plan 2023–2040

Wednesday 14 October 2026

Hearing Statement by CPRE Sussex

Matter 5: The Spatial Strategy and Site Selection Process

Matter 5b: Session for local groups and individual objectors

CPRE Sussex considers that the late-stage modifications have substantially changed the Plan's spatial strategy without adequately demonstrating that the revised distribution of growth is justified or effective. We therefore consider the Plan unsound in its present form.

This statement addresses the District-wide strategy. Detailed objections to individual allocations are covered in separate representations.

1. The strategic question

The Regulation 19 Plan sets out a vision of a District where people can live and work in a high-quality natural environment, with jobs, services, facilities and green spaces close to home. Its spatial objectives include safeguarding settlement character and built heritage, protecting landscape character, reducing the need to travel, supporting the distinct roles of Horsham and its smaller settlements, and providing housing that respects the scale of existing places.

These objectives matter particularly in a predominantly rural District, framed by the South Downs National Park and the High Weald National Landscape. Horsham town is its principal urban centre, while its market towns and villages have distinct identities, services, transport connections and capacities for growth.

A Local Plan should bring housing, employment, transport, infrastructure and environmental protection together. It should shape the District's future, not simply identify land for development.

CPRE Sussex recognises the difficulties caused by the pandemic, water neutrality and the subsequent increase in housing requirements, including the need to accommodate unmet need from neighbouring authorities. The Council has undertaken substantial further work on sustainability, transport, infrastructure and housing delivery.

The question is whether the revised Plan can still deliver its original objectives while accommodating the greatly increased housing requirement.

The Main Modifications add major allocations, including a new settlement at Adversane, to a pattern of growth already shaped by permissions and earlier allocations. These are long-term decisions. A new settlement's location, transport connections, infrastructure and relationship with existing towns will shape the District for decades, potentially well beyond 2040.

The forthcoming Horsham District 2045 Plan and wider Spatial Development Strategy will provide opportunities to consider long-term growth and cross-boundary infrastructure together. The present Plan cannot leave its housing requirement unmet, but neither should irreversible strategic decisions be made principally to close a short-term housing-supply gap.

Across the District, successive planning permissions have already added substantial growth to towns and villages, often without corresponding infrastructure improvements. The cumulative effects on roads, services, settlement character and countryside are now becoming apparent. Opportunities for coordinated access, shared infrastructure and a better overall pattern of development can be lost when adjoining sites are planned separately.

There is also a danger of circular reasoning. Some sites proposed in the emerging Plan have gained permission partly on the strength of their proposed allocation. Once permitted, they become part of the committed housing supply and help shape the revised Plan. The permissions must be recognised, but their existence does not establish that the resulting pattern of growth is the right one for the District.

CPRE Sussex's concern is that the need to assemble sufficient housing capacity has become the principal driver of the revised strategy, while settlement character, accessibility, infrastructure and environmental protection have become less influential in determining where that housing should go.

2. Cumulative growth and settlement capacity

The Council's settlement hierarchy is a useful starting point for deciding where development should go. But a settlement's position in that hierarchy does not establish how much additional growth it can accommodate.

Schools, health services, roads, junctions and sewerage systems all have limits. Settlements in the same tier can have very different capacities for further development.

Henfield illustrates the problem. Around 600 homes are already permitted or allocated but remain unbuilt. The revised Plan proposes a further 450 homes at HNF3. Together, these represent a potential increase of around 40% on the village's existing housing stock of approximately 2,700 homes.

This is growth on a strategic scale, but it has come forward through successive allocations and planning decisions rather than as one coordinated expansion. Each site may be considered acceptable individually; the village will experience their combined effects.

Horsham's own Sustainability Appraisal describes Henfield's growth as notably high, identifies concerns about its cumulative effects on settlement character, and expressly calls for a strategic approach to its expansion from a landscape perspective. It also identifies the need for further assessment of the local road network, including the historic High Street.

Additional households will depend on the same roads, schools, health services and wastewater system as existing residents. Development also reshapes a village and its relationship with the surrounding countryside. Planning sites separately risks losing opportunities for shared infrastructure, coordinated access, connected green spaces and a coherent overall layout.

There is also a wider question about the role of rural settlements. The Plan provides for unmet housing need from neighbouring areas, including the south coast. Yet villages such as Henfield and Ashington lack the employment base, rail connections and range of services available in larger towns. Their growth must be considered alongside where residents will work, how they will travel and what infrastructure they will need.

The same question arises at Pulborough, Storrington, Partridge Green and Small Dole: what will these settlements be like when all their committed and proposed development has been completed? Assessing the acceptability of each site does not, by itself, answer that question.

The natural environment experiences cumulative effects as well. Countryside loss, habitat fragmentation and disruption of wildlife corridors cannot always be addressed through mitigation on individual sites. At Adversane, for example, the relationship between the proposed new settlement and protected barbastelle bat habitats is a strategic consideration, not merely a matter for the design of later development phases.

The Council needs to demonstrate that the combined scale and pattern of growth can be accommodated without undermining the character, functioning and sustainability of the settlements it is intended to support.

3. Consequences of the revised distribution

3.1 Transport and the resilience of the rural road network

The Plan aims to reduce the need to travel and give people greater choice about how they make their journeys. Where development is located determines whether those objectives can be achieved.

Horsham's settlements have very different transport opportunities. Billingshurst has a railway station and secondary school; Southwater has direct access to the A24. Adversane would gain a secondary school but remain dependent on roads and railway stations outside the new settlement. Henfield has no secondary school, railway station or direct dual-carriageway access.

Walking and cycling routes, buses and local facilities are important, but they cannot remove the need for longer journeys to employment, education and services. The proposed distribution must therefore be judged by the journeys it will generate across the wider road network, not simply by the transport measures within each development.

The Council has undertaken District-wide transport modelling, including committed development. CPRE Sussex does not suggest that cumulative traffic has been ignored. Our concern is whether the assessment demonstrates that the combined growth can be accommodated on the roads people will actually use, including during disruption.

Adversane illustrates the issue. Residents and businesses will need connections north towards Billingshurst and Horsham, and south towards Pulborough and the coast. The routes through Pulborough include constrained junctions and the narrow river crossing on the A29, which is vulnerable to flooding. Improvements within Adversane cannot, by themselves, resolve additional pressure at those locations.

There are similar concerns on the A281 and A272 corridors, where development around Henfield and elsewhere adds pressure to junctions and roads through Cowfold and neighbouring villages. Henfield's principal connections are also vulnerable to flooding: the A281 north of the village can close at Mock Bridge, while the A2037 to the south can close at Woods Mill.

The strategic transport model includes smaller settlement allocations, but the evidence does not adequately explain their combined effects at local bottlenecks or how vulnerability to flooding and road closures has been addressed.

These are consequences of the proposed distribution of development, not isolated site-access questions. CPRE Sussex considers that the Council has not yet demonstrated that the revised strategy will reduce the need to travel or that its wider traffic effects can be adequately mitigated.

3.2 Historic settlements

Traffic also affects the District's historic environment. The Sustainability Appraisal Addendum identifies concerns about additional traffic through the historic centres of Henfield and Storrington, and through the Adversane Conservation Area in combination with growth at Billingshurst.

Yet the evidence does not adequately demonstrate how the combined effects of permissions and proposed allocations on listed buildings, Conservation Areas and their settings will be addressed.

Increased traffic through historic centres can also diminish residents' quality of life and visitors' experience of the District's towns and villages, with consequences for tourism and local businesses. These effects must be considered when judging whether the distribution of growth will deliver the Plan's objectives for the historic environment and the quality of its settlements.

3.3 Landscape character and settlement separation

Horsham's countryside, views and distinctive approaches to its towns and villages are important to residents and visitors alike.

The Sustainability Appraisal Addendum recognises widespread landscape constraints and predicts a moderate or uncertain negative effect. It identifies the need to consider Adversane alongside the expansion of Billingshurst, measures to reduce perceived coalescence between Storrington and West Chiltington, and structural landscaping at Kilnwood Vale to maintain separation between settlements.

These measures are welcome. But mitigation at individual allocations does not, by itself, demonstrate that the combined effects of permitted and proposed development will preserve landscape character, important views and meaningful settlement separation.

The Council's own landscape evidence identifies areas of limited capacity for development. The Plan must now accommodate further growth alongside development already permitted in sensitive locations. The question is whether the cumulative change to landscape character and settlement form has been adequately assessed, rather than relying primarily on mitigation at each new allocation.

CPRE Sussex has separately raised concerns about the clarity of the proposed replacement for the settlement-coalescence policy in its representation on MM68. For Matter 5b, our concern is whether the spatial strategy as a whole will maintain the character and openness of countryside gaps and the distinct identities of settlements.

4. Housing need and the resilience of delivery

A Local Plan must do more than identify enough housing land. It must demonstrate that the right homes can be delivered in suitable locations, at the times they are needed.

Failure to deliver housing at the required rate could leave the District unable to demonstrate a five-year housing land supply or meet the Housing Delivery Test. That would weaken the Plan's ability to direct subsequent development to its chosen locations.

4.1 Meeting the needs behind the housing numbers

Almost a quarter of the revised housing requirement—4,641 homes—is intended to contribute towards unmet need from Crawley, Adur and Worthing.

The housing evidence for these authorities identifies substantial need for affordable rented homes, including social rent. The Adur and Worthing assessment recommends greater emphasis on rented affordable housing and provision at social rent levels.

The coastal contribution has been calculated using total dwelling numbers and historic migration patterns. CPRE Sussex considers that the revised strategy has not adequately demonstrated how the affordability and tenure of homes delivered in Horsham will respond to the needs identified in the coastal housing assessment.

Location matters too. Homes in rural parts of Horsham District may be poorly placed to meet the needs of households whose employment, schools, family or support networks are in Crawley or on the coast, particularly those dependent on affordable rented housing and public transport.

Major developments also carry substantial infrastructure costs. If those costs rise or sales and construction slow, there may be pressure on affordable housing and other community benefits.

The Council needs to demonstrate how the location, tenure and affordability of the additional housing will meet the needs relied upon to justify its provision—not simply that the total dwelling number can be achieved.

4.2 Market demand and the delivery timetable

The revised Plan relies on a substantial increase in housing delivery. Much of it is expected from large developments, including Adversane and West of Ifield, which require major infrastructure before homes can be delivered at scale.

The Council has reviewed developers' forecasts and made allowances for the time needed to bring sites forward and build them out. But delivery risks do not arise one at a time. They interact.

A delayed road, junction improvement or wastewater connection can hold up the first homes on a site. Delayed construction can then affect the funding and timing of later infrastructure.

Housing need does not automatically translate into sales and completions at the rates assumed in the Plan's trajectory. The Council's Housing Delivery Study recognises market-absorption risks where major developments overlap, particularly around Billingshurst and Adversane. The Sustainability Appraisal Addendum also identifies concentrations of smaller developments, including at Partridge Green and Henfield, where several sites may come forward within the same local housing market.

CPRE Sussex is not suggesting that these developments cannot be delivered or that individual site trajectories should be fixed now. Our concern is that the evidence does not adequately demonstrate the resilience of the overall timetable if sales or build-out rates are slower than assumed across several sites at once.

The same issue applies to infrastructure-dependent development. Adversane would come forward alongside major growth east of Billingshurst, with both requiring substantial infrastructure and sustained market demand over many years. West of Ifield also depends on major infrastructure being provided early enough to support its housing trajectory.

The Council's housing supply includes a margin above the minimum requirement. But a margin in the total number of homes is not the same as a margin in the number that can be delivered and sold each year. Homes completed towards the end of the Plan period cannot remedy a shortfall when they are needed earlier.

4.3 Water and wastewater infrastructure

Water adds another layer of uncertainty.

CPRE Sussex's representation on MM142 identified a forecast water-supply surplus for Sussex North of just 2.56 million litres a day in 2030/31—around 4% of daily demand. That narrow margin depends on water savings and new infrastructure arriving on time. Yet the water-resource plan used Horsham housing figures prepared before the substantial increase now proposed.

Infrastructure timetables can slip. The restoration of Weir Wood's treatment capacity, for example, has already been delayed by several years. Has the Council demonstrated that water supply will accommodate the revised housing trajectory if further improvements are delayed?

Wastewater presents a separate challenge. Southern Water has identified network improvements needed to serve several major allocations. It has a duty to provide the necessary services, and planning conditions can prevent homes being occupied until adequate capacity is available. But a condition preventing occupation does not deliver the missing infrastructure—or the homes—on time.

Delayed upgrades could postpone occupation and disrupt developers' sales and construction programmes, with consequences for build-out rates.

The question is not simply whether water and wastewater infrastructure must eventually be provided. It is whether the Council has demonstrated that the necessary capacity will be available when the housing trajectory requires it.

Taken together, market demand, infrastructure dependencies and construction programmes raise a fundamental question: is the proposed timetable resilient to

several delays occurring at once, or does it depend on each major element proceeding broadly as anticipated?

5. Conclusion

PRE Sussex considers that the revised spatial strategy has not been adequately justified or shown to be effective in delivering the Plan's objectives and housing requirement. The combined scale and distribution of growth create a significant risk of harm to the District's environment, communities and quality of life. These are not simply questions of whether individual sites can be developed: they concern the long-term consequences of the strategy as a whole.

We ask the Inspector to establish what further assessment is necessary of the cumulative effects of growth, the relationship between housing need and its proposed distribution, and the resilience of the delivery timetable. Where deficiencies are identified, the Council should be required to address them and, where appropriate, propose and consult on further Main Modifications before the Plan is found sound.

If those deficiencies cannot satisfactorily be resolved within this examination, CPRE Sussex's position is that the Council should withdraw the Plan and reconsider its strategy through the Horsham District 2045 plan-making process.

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