

Examination of the Horsham District Local Plan

Statement on behalf of Highwood Group

Representation Number(s): 1194363, 1194366, 1194369

Matter 6d – Strategic Policy HA(NP1): Land at Adversane
(Kingswood) (MM227)

September 2026

Contents

1.	Introduction	3
2.	Response to Issues and Questions for Matter 6d – Strategic Policy HA(NP1): Land at Adversane (Kingswood) (MM227)	5

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Client
Highwood Group

Our reference
HIGS3003

September 2026

1. Introduction

- 1.1 This statement is submitted on behalf of Highwood Group, who have interests in the assessed reasonable alternative growth option west of Billinghamurst (See Regulation 19. Representations: [Document F](#)).
- 1.2 The statement responds to the Inspectors' Issues and Questions for Matter 6d – Strategic Policy HA(NP1): Land at Adversane (Kingswood) (MM227).
- 1.3 Section 20(2) of the PCPA states that the LPA must not submit their Local Plan unless they think it is ready for independent examination. Paragraph 1.2 of the [Procedure Guide for Local Plan Examinations](#) elaborates, stating:

'Having considered the Regulation 19 consultation responses, the LPA should only submit a plan if they consider it to be sound Before submission, the LPA must do all it can to resolve any substantive concerns about the soundness or legal compliance of the plan, including any raised by statutory undertakers and government agencies. (our emphasis).

- 1.4 Paragraph 1.4-1.5 of the same document set out the procedure to follow if the LPA wished to make changes to remedy issues of soundness prior to formal submission of the Regulation 19 Plan in 2024. Our client submitted representations to the Regulation 19 consultation stage at that time, detailing significant issues pertaining to the plan's soundness, and respectfully invited Horsham District Council to remedy such issues prior to formal submission.
- 1.5 The Council opted not to pursue this option, and proceeded to examination late in 2024. However, before such matters of soundness could be examined, the Inspector presiding over the Examination of the plan called a halt to proceedings, recommending the withdrawal of the plan on grounds the DtC had not been met. In addition, the Inspector highlighted that whilst sessions regarding matters of soundness would not therefore proceed, he felt compelled to assert at paragraph 91 of his [interim findings](#), that he nevertheless had:

'significant soundness concerns in relation to the Plan's housing requirements and spatial strategy based on the discussions held at the hearing sessions and all the evidence before the Examination at this time.'

- 1.6 As set out in our client's [representations](#) to the latest modifications consultation, the concerns raised at [Regulation 19 stage](#), on issues pertaining to the plan's soundness, have not in their view been overcome through the latest modifications to the plan and its evidence base. Our client asserts the SA and site selection evidence base the Council seek to rely upon to justify the plan's strategy is an appropriate one, continues to be flawed.
- 1.7 As we set out at length in our representations at Regulation 19 and Modifications consultation stages, and seek to highlight in this Statement, rather than an objective assessment of reasonable alternatives, there is clear evidence to suggest a pre-determined outcome was in mind in drafting the SA from the outset.

- 1.8 Our client continues to assert the reliance in such a flawed evidence base, contrary to national guidance, does not satisfy the 'justified' test of soundness in the version of the Framework relevant to this legacy plan.
- 1.9 Our client also highlights valid deliverability concerns with two particular policy outcomes selected in light of this SA process, specifically in relation to policy sites HA4 and HA(NP1), which calls into question whether such policies meet the Effective test of soundness set out in the Framework.
- 1.10 HDC have acknowledged the current plan at examination is a legacy plan that is not meeting the actual need for homes, particularly affordable homes, as calculated using the current standard method in the Framework (Aug 2026). Whilst HDC are seeking to remedy this through an immediate and parallel review of the plan, this could take some years to adopt. There are also continued uncertainties around LGR, and one cannot rule out the risk of potential further planning reforms if a new government were to be elected in 2029.
- 1.11 A great deal of weight appears to be placed on the certainty that the Local Plan review is underway and will address matters the current legacy plan ran out of time to address. However, as highlighted, given the aforementioned context, it is imperative the plan is rendered sound prior to adoption, and makes every effort to allocate suitable and deliverable sites to help meet as much of the unmet need as possible during this transition period.
- 1.12 Our client continues to request a fair and objective reassessment be undertaken of the reasonable alternatives capable of assisting HDC in this pursuit, and for this to be consulted upon, and used to inform a final democratic decision on a preferred, justified and effective spatial strategy for the emerging Local Plan. HDC have instead arguably sought to prioritise speed over precision, with the outcome that the resultant plan remains unsound. Our client requests the evidence base be updated following an objective reassessment of reasonable alternatives, and a further round of modifications consulted upon to remedy such concerns prior to adoption.
- 1.13 Accordingly, we have examined the Inspector's questions for Matter 6d and provide responses to those we wish to contribute to debate on. We have also respectfully requested the opportunity to participate in the forthcoming hearing sessions to assist the Inspector further on such matters.

2. Response to Issues and Questions for Matter 6d – Strategic Policy HA(NP1): Land at Adversane (Kingswood) (MM227)

Question 1. Transport and Movement

- 2.1 As set out in our client's consultation [response to MM227](#) and critique of the SA [in relation to MM147](#), we have concerns with the weight HDC have given to the site's sustainability credentials throughout the SA process, versus reasonable alternatives.
- 2.2 The scoring of this site in the Site Assessment Update Report (HDC, June 2026) as 'neutral' in transport terms significantly underplays the impacts of a development in such an isolated location in our view. It is also noteworthy that this score has been updated from 'unfavourable' in HDC's 2023 Site Assessment Report ([page 21-22 refers](#)), with no clear reasoning why this is the case.
- 2.3 The spatial strategy decision to opt for a free-standing settlement at Adversane, before making best use of more sustainable extensions to existing upper tier settlements is not justified by the evidence base in our client's opinion. Nor is this policy likely to be effective given the uncertainties surrounding this sites viability and deliverability.
- 2.4 The new settlement is not of sufficient scale to be self-contained and will rely on trips to Billingshurst for key services and facilities for many years. It has been identified that a number of road junctions will be at capacity should the development come forward, requiring mitigation and upgrades, as the B2133 is wholly unsuitable for a development of this size. Mitigation of such impacts is largely contingent on delivering a new rail bridge over the Arun Valley Railway Line and closure of an existing level crossing.
- 2.5 The closing of the level crossing would necessitate the redirection of significant existing traffic, including HGVs through the new development (inc. those associated with the industrial site north of Adversane Lane), which may have significant implications for the capacity, design, character and layout of the site. We understand at a presentation to Billingshurst Parish Council on the 1st of July 2026, the site promoters indicated the closure of this crossing was not their preferred strategy for such reasons. Further clarity is needed on this for avoidance of doubt.
- 2.6 There is also a lack of evidence on the legal rights to deliver such a bridge with Network Rail, or the funding and phasing implications of this for the viability and deliverability of the site. As set out in Document A accompanying [our clients representations to MM227](#), the provision of the bridge will require several steps including agreements with Network Rail, design, planning and construction approvals as well as the actual construction programme itself.
- 2.7 This will involve a significant and lengthy lead in time to deliver in its own right, even putting aside the need for phasing and associated other infrastructure lead in times. Paul Basham Associates anticipate the provision of such a bridge could be at least 5-8 years once rights to proceed and funding are in place based on experience. In the interim, significant reliance would be placed on the existing road network and car-based trips to

Billingshurst. To date there has been no evidence of a formal agreement between the promoters and Network Rail regarding this crucial piece of infrastructure for the site. The provision of a road bridge, as part of a significant infrastructure package that includes upgrades to the road network and the access points into the site, also raises questions with regards to the viability of the site.

- 2.8 The road bridge is estimated to cost £15 million (according to the Housing Delivery Study Update - HDCJB20 [Para. 3.97]), albeit no reference is made to additional shared value payments that may need to be paid to Network Rail to secure the right to build this. As set out in the document accompanying our clients' representations to MM227 (Document A), Paul Basham Associates indicate that this cost could be anywhere in the region of £10-40 million, excluding any shared value payments to Network Rail for rights to construct on their land. This sensitivity analysis is key, as viability and delivery run to the heart of whether the policy is effective. The absence of evidence of land agreements with Network Rail, and the associated implications of any shared value from this on the viability, funding and deliverability of such a critical piece of infrastructure, calls into question the policies effectiveness.

- 2.9 Whilst this site may well be a reasonable strategic option to explore through the review Local Plan, the evidence base does not currently support its inclusion in the current plan at the expense of more sustainable reasonable alternatives (West of Billingshurst comprising one such example). This was the stated case as recently as 2024, as set out in the summary table at page 119 of the [SA](#) accompanying the submitted HDC Regulation 19 Local Plan (SD03a). HDC commented in that table:

'No significant change to the Council's sustainability appraisal conclusions. It was not recommended for allocation in 2021, and this remains the case.'

- 2.10 Indeed, the [Site Assessment Report \(HDC, 2023 \[H11\]\)](#) undertaken in support of the submitted Regulation 19 Plan in 2024, concluded (page 21/22):

'Concern is raised that private vehicle usage will be higher than predicted and this is shared by West Sussex County Council (WSCC), as Highways Authority. This together with the uncertainties of road mitigation lead to a conclusion of unfavourable impacts at this stage. (our emphasis).'

- 2.11 By contrast, there are reasonable alternatives abutting and within a comfortable walk of Billingshurst village centre. The Site Assessment Update Report (June 2026) scoring for transport and West of Billingshurst as 'very unfavourable', in contrast to the 'neutral' score for Adversane is contested.

- 2.12 By any reasonable objective assessment, West Billingshurst ought to have scored at least equal and not worse than the Adversane new settlement, arguably better given it is within walking distance of the village centre and provides significant on-site education, retail, community, sports and recreation facilities that will reduce the need to travel. This is importantly both for existing residents abutting the scheme and future residents, providing a greater and more immediate benefit than likely to be accrued over significantly more years at Adversane. This was further supported in submissions to HDC through the EIA Scoping process for the West Billingshurst planning application, with regards to the transport impacts of Land West of Billingshurst.

- 2.13 As set out in our submissions to Matter 5a and 6c, our client asserts the comparative assessments undertaken by HDC in the Site Assessment Update Report (June 2026) lacks objectivity, and demonstrates a pattern that serves to support a predetermined outcome. This appears motivated by speed of production factors, as opposed to genuine concerns regarding the suitability of reasonable alternatives such as West Billingshurst. The output fails to justify MM227 as an appropriate strategy versus reasonable alternatives, and lacks evidence to demonstrate such a policy will be effective.
- 2.14 The SA and Site Assessment evidence base should be updated, and a meaningful comparison undertaken of reasonable alternatives to Policy HA4 and HA (NP1) in light. This objective assessment process, and the views of the community via a further modification consultation, should then inform the preferred site (s) for inclusion in the plan.

Question 3. Impacts & Mitigation

- 2.15 For brevity and avoidance of duplication, see response to question 1 and our client's representations to MM147 (Q5), specifically the summary table relating to the critique of the Site Assessment Update Report (HDC, June 2026). There remain site specific uncertainties that need to be bottomed out to deduce if the policy is effective, as set out in response to question 1 above.

Question 4: Delivery

- 2.16 For brevity and avoidance of duplication, see response to question 1 and our client's representations to MM147 (Q5), specifically the summary table relating to the critique of the Site Assessment Update Report (HDC, June 2026). There remain site specific uncertainties that need to be bottomed out to deduce if the policy is effective, as set out in response to question 1 above.

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