



# Our Place Sustainable Development Ltd

## Matter 5: The Spatial Strategy and site selection

### Introduction

This statement has been prepared on behalf of Our Place Sustainable Development Limited ('Our Place'). It follows the Inspector's Notes IDJB06 (Inspector's Guidance Note October Hearings) and IDJB07 (Inspector's Hearing Agenda Weeks 2 and 3 October Hearings) and considers the soundness of the Horsham District Council's ('HDC' or 'the Council') spatial strategy and site selection for meeting its identified housing requirement as set out in the Council's proposed Main Modifications contained in documents MMJB01 – MMJB03e.

Our Place is the promoter of Land at Adversane (Kingswood) and has also submitted a hearing statement under Matter 6d which contains a detailed response on the soundness of that strategic site allocation. Our Place considers that the Council's approach to its spatial strategy and selection of sites forms part of a positively prepared strategy for meeting its identified housing needs, including unmet needs from adjoining areas, while distributing growth in a way that is supported by the Council's evidence base and is capable of being delivered with the necessary infrastructure and mitigation. Our Place therefore considers the plan sound consistent with the tests in the National Planning Policy Framework ('NPPF') September 2023.

### i. Spatial distribution

- 1.1 Our Place supports the modifications to Strategic Policy 37, in particular the addition of limb (d) which inserts an allocation for Land at Adversane for 3,200 homes of which at least 1,425 will be delivered within the plan period. Those policy amendments are considered sound in accordance with the NPPF paragraph 35 tests. In the case of Strategic Policy HA(NP1): Land at Adversane, Our Place considers this to be deliverable for the reasons set out in its Matter 6d Hearing Statement and its main modifications consultation response.<sup>1</sup>
- 1.2 The draft plan's approach to the spatial distribution of development is sound being positively prepared to meet identified housing needs, is justified by proportionate evidence on settlement sustainability, infrastructure, transport, environmental constraints and delivery, is effective in allocating sites capable of contributing throughout the plan period, and consistent with national policy in planning for large-scale development as part of a sustainable strategy (NPPF paragraph 73). The strategy is evidenced by a Sustainability Appraisal Report – Addendum (July 2026, HDCJB13) which considers the relative merits of the growth scenarios and the site selection options and finds that the Council's chosen strategy performs very well in achieving housing delivery in a sustainable and infrastructure-led way.
- 1.3 Our Place recognises that the spatial strategy had previously suggested allocating Land at Buck Barn for approximately 3,000 homes, and that the Sustainability Appraisal at that time supported the decision to do so. The draft plan's current spatial strategy now allocates Land at Adversane for 3,200 homes, of which at least 1,425 would be delivered within the plan

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<sup>1</sup> Comment ID 1759.



period. This is based on updated assessment that has used updated and new information that provides greater certainty in the merits and deliverability of Land at Adversane as a strategic site allocation, provided through a preapplication process Our Place has undertaken with HDC and WSCC officers on technical and masterplanning matters. That technical information has been considered as part of the updated Sustainability Appraisal Report – Addendum (July 2026, HDCJB13) and also the Site Assessment Report Update (June 2026, HDCJB14), in which a sound judgement has been reached that, on balance, allocating Land at Adversane provides the best opportunity to deliver the greatest public benefits in meeting the District’s needs for housing, education, community facilities and infrastructure.

### ***Housing need in the District and in adjacent districts***

- 1.4 The total identified housing requirement of 18,712 is a combination of the District’s own objectively assessed needs (14,071 dwellings), a contribution towards Crawley’s unmet need (3,757 dwellings) and a contribution towards Adur and Worthing’s unmet needs (884 dwellings). The latter is a new feature of the housing requirement for which Our Place agrees there is a “*very clear case*” and that has implications for the spatial strategy.<sup>2</sup>
- 1.5 Housing delivery in the District has traditionally been heavily weighted towards the north.<sup>3</sup> Strategic Policy 37 continues this through allocating new land in the north of the District and by intensifying existing allocations around Horsham and Southwater. Significant housing growth has also been allowed on appeal to the northeast of Southwater which further weights growth towards the north and centre of the District.<sup>4</sup> Those allocations and permitted developments will play an important role in contributing towards the housing needs of the north and centre of the District and also towards the unmet needs of Crawley Borough Council and are supported in that regard.
- 1.6 The spatial strategy now, however, positively seeks to rebalance the delivery of housing in the District by allocating Land at Adversane as a new settlement. This will help meet the needs of the District generally, especially those arising from the south of the District which have historically been underserved, and of those unmet needs arising from coastal West Sussex that have been made part of the District’s housing requirement. The allocation of Land at Adversane lies close to the boundary of the coastal West Sussex housing market area and has strong road and rail links to it, thereby making its allocation a sound way of addressing those needs.

### ***The settlement hierarchy and settlement character***

- 1.7 The majority of allocations listed in Strategic Policy 37 are extensions to existing settlements. That approach is generally sound, particularly where it makes effective use of existing services and facilities and represents sustainable urban extensions. Such opportunities are, however, limited and have been broadly exhausted through the site selection process. The Site Assessment Report (HDCJB14b) considers and discounts numerous sites that represent unsustainable expansion that would be poorly related to the existing settlement, altering and undermining its character and putting infrastructure under pressure.<sup>5</sup>

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<sup>2</sup> SA Report Addendum (July 2026, HDCJB13), paragraph 2.3.8.

<sup>3</sup> SA Report Addendum (July 2026, HDCJB13), paragraph 2.2.10.

<sup>4</sup> Planning permission reference DC/23/1178, appeal reference APP/Z3825/W/24/3355546.

<sup>5</sup> The reasons cited against West of Billingshurst (SA744 / SA668 / SA225) are evidence of this.



- 1.8 The allocation of Land at Adversane addresses this by adding a compact new settlement to the overall spatial strategy, enabling growth to be planned alongside new infrastructure, services and community facilities from the outset, rather than being added incrementally to existing towns and villages. The allocation of Land at Adversane relieves pressure on existing settlements to continue accommodating further growth and helps protect their character. Our Place therefore considers the plan's approach to settlement hierarchy and character to be well evidenced and positively prepared.

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

- 1.9 Our Place agrees with the importance placed on ensuring development can be supported by these types of facilities and of delivering them alongside housing to reduce the need to travel long distances to meet everyday needs.
- 1.10 Our Place considers the plan's approach generally sound in this regard, though notes there is a limit to the extent that urban extensions can remain sustainable without overstretching existing facilities and/or stretching the journey times to those facilities.<sup>6</sup> Our Place also notes the importance of those sites that cannot directly deliver or accommodate infrastructure necessary to meet their needs financially contributing towards such through section 106 and/or CIL payments. The Infrastructure Delivery Plan (HDCJB19) represents a decent starting point for this but will need to be reviewed over the plan period.
- 1.11 Strategic Policy HA(NP1) requires that Land at Adversane includes (amongst other things) three schools, sports facilities, a community hall and library, employment spaces and a neighbourhood centre with retail and food and beverage opportunities. In short, everything that is needed to create a sustainable community in accordance with NPPF paragraph 73(b). The allocation of Land at Adversane for 3,200 new homes provides the critical mass to support a sustainable range of employment, social and community facilities, ensuring that these facilities are deliverable. This will help ease pressure on existing settlements, and ensure that infrastructure and facilities are delivered in a manner that reduces the need to travel by delivering homes alongside the facilities needed to support them.
- 1.12 The Council's evidence notes that through allocating Land at Adversane, education facilities would be delivered in a location (the Billingshurst area) where the need for such is greatest and would be able to address an identified deficit in capacity.<sup>7</sup> Those needs cannot be met through education provision elsewhere in the District, at least not without relying on pupils travelling long distances in an unsustainable way. It also allows for a school to be delivered where there is already a post-16 education presence in the form of Brinsbury College, providing synergies and the opportunity for that college to develop and expand in line with the college owner's aspirations. The Council are therefore taking a positive and proactive approach to meeting the need for school places in accordance with NPPF paragraph 95.

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<sup>6</sup> The Sustainability Appraisal Report Addendum (HDCJB13) notes at paragraphs 2.3.15-17 the risk that further urban expansions could represent piecemeal development that is not properly supported by infrastructure delivery to ensure they remain sustainable.

<sup>7</sup> Site Assessment Report Update - Part B: Strategic Site Assessment (HDCJB14b), page 8.



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

- 1.13 Our Place considers the plan's spatial strategy sound with regard to promoting sustainable transport and avoiding unacceptable impacts to the highway network.
- 1.14 The Horsham Transport Study (June 2026, HDCJB15b) highlights that the north of the District has the greatest number of overcapacity junctions.<sup>8</sup> These are mostly clustered in and around Horsham but extend south down the A24 with pinch points around the A272/A24 junctions, where the Study identifies that highways mitigation is required in the local plan scenario.<sup>9</sup> This is without any assumed housing growth in that exact area. The spatial strategy reduces the need for additional highways mitigation that may not be deliverable by focussing development in locations that are or can be made sustainable through improvements to active travel and public transport provision rather than direct highways mitigation. The strategy will therefore help achieve cross cutting goals of reducing congestion and emissions, and improving air quality and public health in accordance with NPPF paragraph 105. On this basis, the Transport Study finds that impacts on the highway network can be mitigated to an acceptable level.
- 1.15 The allocation of Land at Adversane will have benefits for the rail network in at least a few ways: The Site will be supported by increased frequency buses between it and Billingshurst station, offering the opportunity to utilise land within the Site as a park and ride to help relieve parking stress in and around the station itself; the Site is capable of (though importantly not reliant on) delivering a new railway station, providing considerable benefits to connectivity and further helping relieve pressure on Billingshurst and Pulborough stations; and delivery of a bridge over the railway will allow for the closure of the Adversane level crossing, thereby improving the reliability and safety of this part of the line.

### **ii. Constraints**

- 1.16 The spatial strategy is considered sound with regard to the various constraints listed here.

### ***Landscape and countryside***

- 1.17 The benefits of delivering a new settlement in the District are clear though Our Place recognises that doing so involves the loss of open countryside. The local plan's approach however achieves this in an evidence-based way that mitigates the impact of this loss by locating the new settlement at Land at Adversane. The Site is not in landscape designated for its value and is relatively well enclosed in long and medium range views by existing tree belts. For that reason, the significant majority of the Site is assessed as having a moderate-high capacity for housing development in the Landscape Capacity Study (EN08).<sup>10</sup> Land at Adversane is practically unique in that regard. The Council's evidence also notes that the allocation mitigates loss of countryside by designating it to deliver 3,200 homes in a compact new settlement.<sup>11</sup> Alternatives considered by the Council were notably less efficient, requiring more land to deliver as many or fewer homes.

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<sup>8</sup> Horsham Transport Study (June 2026, HDCJB15b), Figure 5-1.

<sup>9</sup> Horsham Transport Study (June 2026, HDCJB15b), Tables 5-1 to Table 5-6 and paragraph 5.2.31. and 5.2.33.

<sup>10</sup> Landscape Capacity Study (May 2021, EN08), Zone 4a.

<sup>11</sup> Site Assessment Report Update - Part B: Strategic Site Assessment (HDCJB14b), page 14.



### ***Heritage assets and their settings***

- 1.18 The District benefits from a strong range of heritage assets that help define and contribute to its character. The spatial strategy appropriately allocates land for development away from the most sensitive of those heritage assets, including away from its Registered Parks and Gardens where it may be less feasible to appropriately and sufficiently mitigate harms to those heritage assets and their settings.

### ***Habitats and biodiversity***

- 1.19 The District is home to numerous internationally designated habitat sites, including The Mens SAC, the Arun Valley SPA/SAC/Ramsar sites and the Ebernoe Common SAC. The Habitats Regulations Assessment (July 2026, HDCJB12) finds that there would be no adverse effect on the integrity of internationally designated sites within the District as a result of the local plan growth either alone or in combination with other plans and projects.<sup>12</sup> This demonstrates that the plan is both sound and legally compliant with respect to the Council's duties under The Conservation of Habitats and Species Regulations 2017.
- 1.20 Whilst not subject to formal ecological designations, the ecological value of the Knepp Estate is rightly treasured and its protection and role in achieving District-wide wildlife corridors given appropriate regard and justifiable weight by the Council in its site selection process and chosen spatial strategy.

### ***Flood risk and climate change mitigation***

- 1.21 The Council has provided an updated Flood Risk Sequential and Exception Test (June 2026, HDCJB17) that Our Place considers represents a sound basis for determining the optimal spatial strategy with regard to climate change. It makes clear that flood risk was considered from the outset of the site selection process and has informed the Spatial Strategy.
- 1.22 The sequential test has been applied to Land at Adversane, which is within Flood Zone 1, and finds the test is passed, representing a sound and sustainable approach to meeting housing needs where risk of flooding is lowest, in accordance with the sequential approach set out in the NPPF. The Council's Strategic Site Assessment (HDCJB14b) finds Land at Adversane to perform favourably with regard to flood risk and climate change mitigation – it is the only strategic site to be found so.
- 1.23 A key component of climate change mitigation is reducing the need to regularly travel long distances to meet daily needs. The allocation of Land at Adversane to deliver a compact new settlement addresses that by achieving a form of development where every day needs can be met onsite and by shorter journeys that can be done by walking or cycling.

### ***Services including water and sewerage***

- 1.24 The NPPF requires strategic policies to align growth with infrastructure and to make provision for water, wastewater, energy and digital infrastructure. Paragraph 73 and footnote 37 recognise that larger-scale development will need supporting infrastructure and that requirements may be kept under review as delivery progresses. In other words, it is not

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<sup>12</sup> Horsham Local Plan Modifications Habitat Regulations Assessment (July 2026, HDCJB12), paragraphs 6.39, 7.5 and 7.12-13.



necessary for the plan to only allocate sites that are already fully serviced or that have fully identified infrastructure and phasing plans. Rather, the Council's Infrastructure Delivery Plan ('IDP') (2026, HDCJB19) provides a reasonable and proportionate basis for demonstrating that the plan's spatial strategy is deliverable and can be supported by infrastructure over time. This will form part of the evidence base used by utilities providers in preparing their plans for necessary upgrades and reinforcements.

### iii. Housing delivery

1.25 Our Place considers the Council's approach to housing delivery to be generally sound.

#### ***Whether the range of sizes and types of site would ensure that different housing needs and aspirations would be adequately met***

1.26 The Council has allocated a sufficient mix of sites, including small, medium and large that will be able to contribute towards housing delivery throughout the plan period. As recognised in NPPF paragraph 73 the supply of a large number of homes can be best achieved through planning for larger scale development, which the Council has achieved by allocating larger sites, including a new settlement on Land at Adversane.

1.27 Table 9 of the draft plan sets out the appropriate strategic mix of home sizes based on tenure, which is evidenced by the Northern West Sussex Strategic Housing Market Assessment (November 2019, H01).<sup>13</sup> The benefit of a strategic-scale allocation such as Kingswood is that it provides the opportunity to provide a range of housing types and tenures to meet a diverse mix of housing needs, including a policy-compliant level of affordable housing which Our Place is committed to delivering. The Site can provide a mix of characters and types, ranging from smaller properties and apartments suitable for first time buyers to later living housing. Strategic sites also have the capability to contribute towards meeting the housing needs of the gypsy and traveller population.

1.28 The Financial Viability Assessment (HDCJB16) evidences that strategic sites can achieve 35% provision of affordable housing, compared to 10% for brownfield sites. Strategic sites can therefore balance both scale and affordable housing delivery, meaning that they represent the best means of addressing the District's considerable needs for affordable housing (assessed as being 554 dwellings per annum).<sup>14</sup>

#### ***Whether the range of sizes and types of site would ensure that enough homes would come forward at the right time during the plan period to meet the housing requirement***

1.29 The Council has justifiably adopted a stepped trajectory whereby the housing requirement steps up in tranches, requiring an average of 1,601 dwellings per annum for years 11-17 of the plan. This reflects the historic issues caused by water neutrality in the District which has stifled supply in recent years.<sup>15</sup> This does though defer the bulk of the housing requirement to the later years in the plan period. It is appropriate, therefore, that the Council has chosen to allocate a new strategic site at Land at Adversane, which will be able to consistently deliver

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<sup>13</sup> Northern West Sussex Strategic Housing Market Assessment (November 2019, H01), Table 71.

<sup>14</sup> HDC Housing Needs Topic Paper (HDCJB07), paragraph 18.

<sup>15</sup> As evidenced by the Council's current housing land supply position, assessed in the Council's most recent Annual Monitoring Report as being 1.7 years.



large numbers of homes each year in the middle and later years of the plan period when the small and middle sized allocations have been fully built out.