

Further Written Statement

Matter 5 – The Spatial Strategy and Site Selection

Matter 5a – Session for Site Promoters / Developers / Agents

- 1.1 This written statement has been prepared on behalf of Wates Developments Limited (Wates) ahead of the hearing session scheduled for Tuesday 13 October 2026. Wates have been involved in the Council's emerging Local Plan process for a number of years, having made representations at every stage of the process.
- 1.2 Since the initial hearing sessions were held in December 2024, Wates have secured planning permission (or a resolution to grant) for new residential development on three sites¹ within the District for 186 new homes, two of which are proposed for allocation within the emerging Local Plan². Wates therefore have a proven track record for housing delivery within the District.
- 1.3 It is acknowledged that the discussion topics for the 13 October hearing session are purposely limited to spatial distribution matters. In light of this, our further comments are limited to the approach taken by the Council in respect of the spatial distribution of development around Horsham and to the north of Southwater.

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***
- the settlement hierarchy and settlement character***
- access to employment, social and community facilities and the objective of reducing the need to travel***
- the highway network***
- the rail network***
- public transport and active travel***

- 1.4 Given the northern part of the District includes Horsham, the District's main town, and a number of smaller towns, such as Southwater, means that a spatial strategy that focuses the majority of new development within this part of the District is inherently appropriate. As is set out within the Council's Housing Delivery Study Update, July 2026 (ref: HDCJB16), the north part of the District has the greatest concentration of people, employment and existing services and infrastructure and greater wider accessibility to employment opportunities; and therefore, the area where a higher delivery rate in relative terms could be expected to be sustained (para 4.14).

¹ Land east of Marringdean Road, Billingshurst (79 homes), Land west of Shoreham Road, Small Dole (45 homes) & Land north of Melton Drive, Storrington (62 homes).

² Land west of Shoreham Road, Small Dole (Strategic Policy: HA16 (SMD1)) & Land north of Melton Drive, Storrington (Strategic Policy: HA18 (STO1))

- 1.5 The close proximity and transport connections to Crawley provides further reason for focusing development in this area in order to meet unmet needs from Crawley (221 homes pa, 3,757 homes in total). Notwithstanding existing proposed allocations at Horsham, the draft Local Plan only proposes one allocation to the south of the town (ref: HOR1). In accepting that growth is appropriate to the south of Horsham but by only proposing a single allocation fails to optimise housing delivery around the largest town in the District in an area where the greatest need exists. As such for this reason and those that we set out below, we do not consider that this approach is justified.
- 1.6 There are a number of second tier settlements in close proximity to Horsham including Southwater, to the south. The concentration of higher order settlements in a relatively small part of the District provides an appropriate area for future growth given the range of employment, social and community facilities on offer in both Horsham and Southwater. Furthermore, the consented development at Horsham Golf Club (ref: DC/23/1178), north of Southwater, has changed the settlement pattern as the settlement edge of Southwater (as per the 2026 NPPF definition) now extends north of the A24, which will lead to greater semi-urban influences across this area (which already exist by virtue of the existing Park & Ride, service station and depot). The absence of any allocations north of the A24 limits the scale of future development in an area that is in close proximity and heavily influenced by higher order settlements. As such, we consider that the spatial approach fails to maximise the opportunities to reduce the need to travel.
- 1.7 In terms of the highway network, the area around Horsham benefits from good access to the strategic road network (via the A24/A264) along with the wider network more generally, e.g. Worthing Road (B2237) which provides a direct north/south link between Southwater and Horsham. This level of connectivity provides further justification for focusing development in this part of the District. We note that the Horsham Transport Study (ref: HDCJB15b) identifies the A24 / B2237 Hop Oast Roundabout as requiring mitigation with a signalisation scheme (potentially also including bus priority measures) having been prepared and costed (paragraphs 6.3.4 – 6.3.6). Implementation of this scheme, which additional development could ensure delivery of, would have the effect of increasing the capacity of this junction such that it would not represent a constraint to further development (Tables 6.1 & 6.4).
- 1.8 In addition to proximity to the road network, the area to the north of Southwater has excellent public transport connectivity given the Horsham park and ride and level of service provided by bus routes 23 and 98 (the latter having its service pattern enhanced to every 15 minutes as a result of development at Horsham Golf Club). In the context of Horsham being a largely rural District, this level of public transport service is exceptional given that as a result of this level of service, the area is situated close to two railway stations (Horsham and Christs Hospital which are typically served by up to 4 trains per hour in each direction towards London and the south coast). The overall accessibility of this part of the District was underlined by the conclusions of the Inspector of the Horsham Golf Club development who reached a view that the site was in a sustainable location³. As part of this development, a range of active travel improvements have been secured including footway widening, lighting and new crossings along Worthing Road between the Park and Ride and Horsham town centre.

³ Paragraph 38 and 39, PINS Appeal Decision ref: [3355546](#)

1.9 It is evident that this part of the District has excellent connectivity to the road network together with high-quality public transport services which exists in few other parts of the District. The proposed distribution of development, by failing to locate additional development in this highly accessible location, would not be consistent with national policy as it would be contrary to achieving sustainable development (as per paragraph 8 of the NPPF)

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 sewage***

1.10 In terms of landscape, land to the east of Horsham is constrained by the High Weald National Landscape, the boundary of which is immediately to the east of the existing built-up edge and south of the A264. To date, no development was proposed in this area however the Main Modifications include an additional allocation for 120 homes wholly within the National Landscape (ref: HOR3).

1.11 The Council's updated Site Assessment Report (p22, HDCJB14c) acknowledges the need for exceptional circumstances to be demonstrated (as per paragraph 177 of the NPPF (September 2023)) which the report states has been met by the very significant need for housing in the District. Notwithstanding this, paragraph 177b requires the scope for developing outside the designated area to be assessed. It is not apparent that this has been undertaken or any conclusions reached on whether this growth can be met outside of the designated area.

1.12 In light of the above, we consider that the less constrained nature of land to the south of Horsham which is largely free of countryside / landscape constraints, and indeed is subject to very limited environmental constraints, provides a potential alternative location of growth outside of any protected landscape. On this basis, the spatial approach of locating development east of Horsham is not justified nor consistent with national policy.

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***

1.13 The Council's updated Housing Trajectory and Five Year Housing Land Supply Update (August 2026, ref: HDCJB22) states that the Council is able to demonstrate a 5 year supply on adoption. The trajectory sets out delivery in the initial years which will largely come from existing commitments, albeit no detailed trajectory has yet been published.

1.14 The trajectory sets out that delivery is expected to increase from c230 homes in 2025/26 to nearly 1,600 homes in 2028/29 (the requirement being 1,100 homes in that year). It should be noted that housing completions in 2025/26 are now anticipated to be less than half of that assumed by the Council in April 2026 (470 homes as set out in Table 2, HDCJB05). Notwithstanding this, it is evident

that water neutrality issues have impacted upon past delivery but even accounting for this, achieving an increase of c700% increase in housing delivery in the space of 3 years and maintaining it for the following 7 years will be challenging.

- 1.15 In the absence of detailed information, it is not possible to examine the assumptions that sit behind this trajectory however it is apparent that from 2028/29 onwards, delivery from smaller sites will be key for the Council in demonstrating a rolling 5 year housing land supply. The geographical spread of smaller sites is relatively even across the District and so as a result, future growth in the north of the District is disproportionately skewed towards strategic sites which are typically expected to be delivered later in the plan period. This is particularly the case at Southwater where the vast majority of new residential development is expected to come forward at the HA3 strategic site (and Horsham Golf Course which is also significant in scale) meaning that delivery in this part of the District is likely to be limited at a time when a significant increase in housing delivery is required.
- 1.16 The north of the District is expected by the Council's own evidence to sustain the highest delivery rate and that this is where the greatest need exists (given unmet needs from Crawley). In order to deliver the required level of housing, a greater mix of sites in the north is therefore necessary to ensure sufficient supply early in the Plan period and a robust buffer (avoiding delivery rates which are significantly lower than envisaged as is the case in 2025/26). In light of all of this, we consider it necessary for additional smaller sites to be allocated to ensure an effective strategy that delivers enough new homes at the right time.