



Examination of the
Horsham District Local Plan 2023-2040

Matter 6c: Strategic Policy HA4: Land East of Billingshurst (including the proposed southern extension)

HEARING STATEMENT

Prepared by Blue Fox Planning Ltd on behalf of:

Richborough

Site Interest: Land off Coneyhurst Road, south of the railway, forming part of Strategic Policy HA4: Land East of Billingshurst

Representation Numbers: 1207902, 1211480 and 1211486

September 2026

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1. Introduction

- 1.1 This statement responds to Matter 6c of the Inspector's Hearing Agenda (IDJB07), concerning the soundness of Strategic Policy HA4: Land East of Billingshurst, including the proposed southern extension. It should be read alongside Richborough's earlier hearing statements, its August 2026 Proposed Main Modifications Representation and the Joint Position Statement (JPS) agreed between Crest Nicholson, Bellway Homes and Richborough, appended to this statement.
- 1.2 Richborough now controls Land off Coneyhurst Road, south of the railway. At Regulation 18 stage in February 2020, before Richborough acquired an interest in the land, the Council identified land north and south of the railway as the proposed Land East of Billingshurst growth location. The Submitted Plan subsequently retained only the northern land within HA4 for at least 650 homes.
- 1.3 Having subsequently secured control of the southern land, Richborough continued promoting the southern land throughout plan preparation and the examination. Its Matter 1 and 2 statements in April 2026 identified the land as an available, achievable and deliverable opportunity capable of contributing to the additional housing provision required through the examination.
- 1.4 Following the Inspector's post-hearing findings and the Council's reassessment of housing provision, MM226 restores the broad two-parcel growth location, extends HA4 south of the railway and increases its capacity to at least 1,000 homes. Richborough strongly supports those changes.
- 1.5 Richborough controls the southern land and has undertaken capacity, masterplanning, highways, access and ecological work, prepared a Social Infrastructure and Community Audit and commenced technical work concerning the replacement railway crossing. Its local delivery record includes securing outline permission for up to 265 homes at Glebe Farm, Steyning.
- 1.6 The final capacity of the southern land will be established through evidence-led masterplanning. "At least 1,000 homes" is the minimum for HA4 as a whole: it is not a ceiling and does not fix a numerical split between the northern and southern parcels.
- 1.7 Richborough supports a coordinated approach to the planning of HA4. Its focused concern is that the policy must not allow one separately controlled parcel to be delayed by decisions, infrastructure or land controlled exclusively by another party.

2. Matter 6c: Strategic Policy HA4: Land East of Billingshurst (including the proposed southern extension)

i. Transport and movement

Highways Access Arrangements

- 2.1 The northern and southern parcels have different highway-access opportunities and do not depend upon a single vehicular access. The southern land can be accessed independently, subject to detailed design, capacity and safety assessment. The updated Transport Assessment evidence (HDCJB15a–b) assesses the preferred growth strategy and mitigation associated with Billingshurst. Individual and cumulative effects can be assessed through coordinated transport evidence without requiring a single application. The JPS commits the promoters to sharing relevant information and coordinating access, movement and strategic mitigation, with necessary and proportionate measures and financial contributions apportioned through the respective applications.

The footbridge or underpass: funding, phasing and safeguarding

- 2.2 Richborough supports the closure of the existing pedestrian level crossing and its replacement with a safe and accessible pedestrian, wheeling and cycle connection. Network Rail's Main Modifications representation confirms that it considers MM226 sound, supports the additional wording enabling closure and welcomes safeguarding of land for signalling and other requirements.
- 2.3 Criterion 6(f) permits phased delivery of the replacement crossing, requires the necessary land to be safeguarded where fully accessible provision is not delivered initially and requires the crossing to be completed before completion of all dwellings. This recognises that its delivery requires design development, statutory approvals, land arrangements, funding and coordination with Network Rail and West Sussex County Council.
- 2.4 Richborough has appointed a specialist consultant to assess the crossing's location, form, specification, cost and Network Rail land and rights requirements. The JPS commits the promoters to safeguarding the necessary land and agreeing an evidence-based delivery trigger and fair funding arrangements with the relevant bodies.
- 2.5 That trigger may appropriately be linked to the opening of the primary school if the technical evidence demonstrates that this is when the material safety requirement arises. In that event, the replacement crossing should be operational before the school opens or comes into use. The trigger must ultimately be agreed with Network Rail, West Sussex County Council and the Council, having regard to anticipated use of the crossing by development on both parcels.

- 2.6 The IDP's requirement for delivery before commencement is inconsistent with criterion 6(f). Network Rail considers MM226 sound and has **not** requested delivery before commencement or first occupation. The policy should prevail and the IDP should be aligned with the evidence-based, phased approach.
- 2.7 Highwood Group, Billingshurst Parish Council and Trevor Leonard raise concerns about the crossing's cost, lead-in time, statutory processes, Network Rail agreements and delivery trigger. These matters require further work but do not demonstrate that HA4 is undeliverable. Network Rail considers MM226 sound and has not sought delivery before the first dwelling is completed. The JPS provides for an evidence-based trigger, potentially linked to the opening of the primary school, subject to technical evidence and agreement with the relevant authorities. Criterion 6(f) enables the necessary safeguarding and phased delivery.

Integration of sustainable transport

- 2.8 Richborough's Social Infrastructure and Community Audit (SICA) confirms that HA4 is close to Billingshurst railway station and the settlement's established services and facilities. The replacement crossing, pedestrian and cycle network and proposed circular route can improve accessibility for existing and future residents, with detailed connections resolved through coordinated masterplanning.

ii. Design, layout and facilities

Physical integration with Billingshurst and the impact on the village

- 2.9 The enlarged allocation represents a planned extension to an established settlement rather than isolated or dispersed development. The Site Assessment Report Update (HDCJB14a–f) considers the northern and southern parcels individually and together and recommends their allocation as a single comprehensive strategic extension.
- 2.10 The railway physically distinguishes the parcels but does not prevent coordinated movement, landscape, green-infrastructure and community strategies. Detailed layouts can respond separately to each parcel's character, access and constraints.
- 2.11 The southern land adjoins Billingshurst, lies approximately 400 metres from the station and is adjacent to the Daux Road Employment Area. Billingshurst Leisure Centre and The Weald School are approximately 600 metres away, Billingshurst Primary School approximately 750 metres away, and station-area services are within convenient walking distance.

Social and community facilities

- 2.12 The SICA confirms that Billingshurst is a sustainable settlement with established facilities serving the village and surrounding rural area. It identifies pressures relating to healthcare, indoor sports, some playing-pitch typologies, natural and semi-natural greenspace, provision for young people and allotments, but does not identify an evidence-based requirement for standalone strategic community or sports buildings on the southern land.
- 2.13 Strategic provision should therefore be coordinated across HA4, with proportionate contributions towards existing facilities and on-site provision of accessible open space, multifunctional green infrastructure, children's play, informal recreation, sustainable drainage and active-travel connections. The IDP and MM226 provide for a community hub and primary school serving HA4, while the JPS commits the promoters to an Infrastructure Schedule identifying responsibilities, triggers and funding.
- 2.14 West Sussex County Council advises that the education requirement should comprise a one-form-entry primary school expandable to two forms, incorporating SEND provision, with nursery provision adjacent to or combined with it. The school land is north of the railway and outside Richborough's control. The southern land should contribute proportionately but should not depend unreasonably upon another landowner completing the facility. In line with the response received from WSCC Education on Main Modification ref: MM226, Richborough supports the wording for criterion 2d)i) to be reverted to state a 1FE primary school expandable to 2FE.

C2 accommodation & Gypsy and Traveller provision

- 2.15 C2 accommodation could be provided where need, suitability and viability are demonstrated through masterplanning. The policy should not impose an unidentified quantum or location, recognising that value generated predominantly by C3 housing will support HA4's infrastructure. Richborough confirm that, where evidenced and proportionate, C2 can be accommodated within the land under their control.
- 2.16 Richborough supports meeting identified Gypsy and Traveller needs but notes that the pitches were first allocated to Land East of Billingshurst within the northern portion of HA4 in the Regulation 19 Proposed Submission Plan. Criterion 2(a) should therefore retain the pitches within the northern portion of HA4, with their precise location determined through coordinated masterplanning having regard to accessibility, integration, amenity, constraints and delivery.

iii. **Impacts and mitigation**

Landscape and Countryside, Wildlife and Biodiversity & Heritage Assets

- 2.17 The Site Assessment Report Update and Sustainability Appraisal Report Addendum identify landscape, ecological, heritage and archaeological sensitivities but no overriding constraint. MM226 permits separate north/south landscape, ecology and green-infrastructure strategies where comprehensive planning would not be prejudiced. This enables layouts to respond to landscape character, ancient woodland, hedgerows, ecological corridors and heritage assets through appropriate buffers, structural planting, connected green infrastructure and mitigation. The statutory requirement for at least 10% biodiversity net gain will apply; Richborough does not accept that a higher site-specific percentage is necessary for soundness.
- 2.18 The updated HRA and technical note (HDCJB12 and HDCJB12a) conclude that, with plan safeguards and project-level mitigation, the modifications would not adversely affect the integrity of relevant European sites. A coordinated approach to EIA scoping and assessment can address cumulative effects across HA4 while allowing separate applications for the northern and southern parcel.

Climate change mitigation, drainage, flood risk and utilities

- 2.19 The Environment Agency considers MM226 legally compliant and sound. Flood Zones 2 and 3 associated with the Par Brook can be addressed through a sequential layout, sustainable drainage and restoration and enhancement of the watercourse as part of the green and blue infrastructure network.
- 2.20 Southern Water confirms that limited water and wastewater-network capacity is not a constraint where occupation is phased with the necessary reinforcement. The Housing Delivery Study and IDP also identify wastewater-treatment and electricity-network reinforcement, which can be addressed through coordination and appropriate occupation triggers.

iv. **Delivery**

Masterplanning

- 2.21 Richborough supports comprehensive and coordinated planning. It does not support an interpretation of criterion 2 that would require a single masterplan, Design Code, phasing plan or planning application to be agreed before either parcel could progress.

- 2.22 Such an interpretation could create an unnecessary dependency between separate landownerships divided by an operational railway. Development of a suitable scheme on one parcel could be delayed unnecessarily as a consequence.
- 2.23 The policy already recognises the need for a proportionate approach. Criteria 3 and 4 permit separate landscape and ecology and green-infrastructure strategies where the comprehensive planning of HA4 would not be prejudiced. Criterion 6 distinguishes between transport requirements applying to different parts of the allocation, criterion 6(f) permits phased delivery of the railway crossing and criterion 2(d) locates the primary school north of the railway.
- 2.24 As set out in Richborough's Main Modifications Representation, criterion 2 should therefore require an overarching comprehensive masterplanning framework showing the strategic relationships across HA4, while expressly permitting separate masterplans, Design Codes, phasing plans and planning applications where they are consistent with that framework and would not prejudice delivery of the wider allocation.
- 2.25 The JPS provides further assurance. The promoters commit to coordinated masterplanning and EIA scoping, an Infrastructure Schedule, aligned technical evidence where appropriate and continued engagement with the Council, County Council, Network Rail and infrastructure providers. Separate applications are therefore compatible with comprehensive development.

Commencement and build-out rates

- 2.26 The Housing Delivery Study (HDCJB20) concludes that first completions at HA4 in 2029/30 or 2030/31 are realistic and that there is a strong prospect of all 1,000 homes being delivered within the Plan period. Its assumptions are cautious, including a peak delivery rate of approximately 120 dwellings per annum.
- 2.27 The promoters have confirmed a combined programme of 25 completions in 2028/29, 175 in 2029/30, 300 in 2030/31, 325 in 2031/32 and 175 in 2032/33. This would deliver all 1,000 dwellings by 2032/33, demonstrating the ability to deliver the policy minimum without capping HA4's capacity or fixing the distribution between the northern and southern parcels

Funding and Phasing of Infrastructure

- 2.28 The viability update (HDCJB16) confirms that the northern parcel remains viable on the basis of the assessed C3-led development and infrastructure package. It does not separately assess the southern parcel, however, Richborough can confirm that it is viable .

- 2.29 Infrastructure requirements should be identified in a coordinated Infrastructure Schedule, with delivery responsibilities, triggers and fair and reasonable financial contributions secured through the respective planning obligations. This allows infrastructure serving the allocation as a whole to be coordinated without making either parcel dependent upon works or land controlled exclusively by another promoter.

Potential delivery impediments

- 2.30 The evidence identifies a number of matters that require further coordination, but none amounts to a fundamental impediment to the delivery of HA4. The principal matters are the design, land arrangements, funding and a delivery trigger for the replacement railway crossing; coordination between the separate landownerships; the timing and funding of education and other strategic infrastructure; water, wastewater and electricity-network reinforcement; and the fair apportionment of shared infrastructure costs.
- 2.31 The replacement railway crossing requires further technical development and engagement with Network Rail, the Council and West Sussex County Council. Richborough, Crest and Bellway have appointed specialist consultants to assess its location, specification, cost and land or rights requirements. Criterion 6(f) already provides an effective policy mechanism by allowing the necessary land to be safeguarded and the crossing to be delivered on a phased basis before completion of all dwellings. The absence of a concluded design or agreement at the plan-making stage does not demonstrate that the allocation is undeliverable.
- 2.32 Separate ownership of the northern and southern parcels would become a delivery impediment only if criterion 2 were interpreted as requiring every masterplan, Design Code, application or phase to be prepared and agreed jointly. The focused amendment sought by Richborough would remove that risk while retaining an overarching framework for matters that genuinely require coordination.
- 2.33 For example the school land and certain other infrastructure are north of the railway and outside Richborough's control. The southern land should make proportionate contributions but should not depend upon another promoter completing works that are unnecessary for its particular phase.
- 2.34 Southern Water's evidence confirms that limited network capacity is not a constraint to development where occupation is phased to align with reinforcement. The HDS and IDP similarly identify wastewater-treatment and electricity-network reinforcement, but do not conclude that those matters prevent commencement or delivery within the Plan period.

- 2.35 The JPS provides mechanisms for coordinated masterplanning, technical evidence, infrastructure scheduling, phasing and funding. The identified matters are therefore manageable delivery requirements rather than reasons to doubt the allocation's deliverability.

v. Assessment against the Soundness Tests

- 2.36 **Positively prepared.** HA4 will deliver at least 1,000 homes in a sustainable, rail-accessible location, contributing to the District's housing requirement and unmet needs while securing affordable housing, infrastructure, open space and mitigation necessary to support sustainable growth.
- 2.37 **Justified.** The SA Addendum (HDCJB13) accounts for the submitted allocation and additional southern land through different components of its alternatives exercise. The Site Assessment Report Update examines the parcels individually and in combination, while transport, flood-risk, infrastructure, delivery and habitats evidence addresses the modified strategy. Taken together, the evidence provides a proportionate basis for MM226. A compulsory single masterplan, Design Code and phasing plan is not justified given the railway, separate ownerships, different accesses and the policy's acceptance of separate strategies.
- 2.38 **Effective.** The land is available and actively promoted, and the Housing Delivery Study (HDCJB20) identifies a strong prospect of at least 1,000 homes being delivered within the Plan period. The JPS demonstrates effective joint working and establishes mechanisms for coordinated masterplanning, technical evidence, infrastructure scheduling and phasing. Effectiveness requires separate masterplans, applications and programmes where consistent with the overarching framework and not prejudicial to HA4.
- 2.39 **Consistent with national policy.** HA4 directs substantial housing growth to an accessible settlement with a railway station, employment and an established range of services and facilities. It provides for sustainable transport, community infrastructure, a mix of housing, flood-risk management, biodiversity enhancement and climate-resilient development. Subject to the focused amendments sought by Richborough, the policy will enable sustainable development in accordance with the September 2023 National Planning Policy Framework.

vi. Requested modifications and conclusion

- 2.40 Richborough maintains the focused changes requested in its August 2026 Main Modifications Representation. Criterion 2 should be amended to make clear that development will come forward within an overarching comprehensive masterplanning framework, but that separate masterplans, Design Codes, phasing plans and planning applications may be prepared for the land north and south of the

railway where they are consistent with that framework and would not prejudice comprehensive planning or delivery.

- 2.41 “At least 1,000 homes” should remain the minimum for HA4 as a whole, without a ceiling or fixed north/south split.
- 2.42 Criterion 2(a) should be amended to require the five Gypsy and Traveller pitches to be provided at a suitable location within the northern part of the allocation. The policy should also clarify that C2 accommodation will be provided only where a need is demonstrated and its location and delivery are justified.
- 2.43 Criterion 6(f), including its ability to safeguard land and phase the replacement crossing, should be retained. The IDP should be aligned with that wording and should not impose delivery before commencement or first occupation where that is not supported by Network Rail or the technical evidence.
- 2.44 With those amendments, HA4 will provide a clear and effective framework for coordinated strategic development while enabling the separately controlled parcels to progress without unnecessary dependency. The allocation is available, achievable and deliverable, is supported by effective joint working and is capable of delivering at least 1,000 homes and the necessary infrastructure well within the Plan period.



APPENDIX 1

Joint Position Statement

Joint Position Statement

Land East of Billingshurst (Strategic Policy HA4)

Crest Nicholson, Bellway Homes and Richborough

FINAL

25th September 2026

Purpose

This statement has been prepared jointly by Crest Nicholson, Bellway Homes and Richborough ("the Parties"), the promoters of the land comprising the Land East of Billingshurst strategic allocation (Strategic Policy HA4).

The purpose of the statement is to confirm the Parties' shared commitment to the comprehensive and coordinated delivery of the allocation and to provide assurance to Horsham District Council and the Local Plan Inspector that the allocation is capable of being delivered in a timely and effective manner.

Shared Commitment

The Parties are committed to working collaboratively with each other, Horsham District Council, West Sussex County Council, Network Rail, infrastructure providers and other relevant stakeholders to deliver a sustainable and comprehensively planned urban extension to Billingshurst.

The Parties recognise that successful delivery of the allocation requires coordination across the land north and south of the railway and are committed to maintaining a collaborative approach to infrastructure planning, masterplanning and delivery.

The Parties will agree shared joint-working arrangements – to facilitate cooperation, where necessary, including sharing of relevant technical information and studies – in order to advance planning application(s) within the Policy HA4 area.

Strategic Infrastructure

The Parties acknowledge the importance of delivering the infrastructure necessary to support the allocation, including:-

- A new primary school (1FE expandable to 2FE where justified);
- A safe and accessible pedestrian and cycle connection across the railway, potentially including a new bridge (assisting with Network Rail's objectives to close at-grade railway crossings);
- Highway and transport improvements;
- Utilities and energy infrastructure, including any network reinforcement requirements appropriate for an urban extension (rather than a standalone new settlement);
- Community facilities;
- Green infrastructure and public open space; and
- Gypsy and Traveller accommodation in accordance with Policy HA4.
- **C2 older persons' housing**, where a need is demonstrated and the provision is justified, recognising that the delivery of Policy HA4 will be funded predominantly, if not entirely, by the value generated by the C3 housing.

The Parties recognise that some elements will require engagement with statutory bodies and third-party organisations. However, based on work undertaken to date, the Parties are not aware of any infrastructure constraints that would prevent delivery of the allocation.

Coordination and Delivery

The allocation is in separate landownerships and may appropriately come forward through at least two separate planning application(s) reflecting the land interests north and south of the railway.

The Parties consider that separate planning application(s) are fully compatible with the comprehensive development of Policy HA4, provided that development is brought forward within a coordinated framework and under the joint-working arrangements.

Accordingly, the Parties are committed to:

- Coordinated masterplanning;
- Joint consideration of infrastructure requirements, triggers and delivery mechanisms (achieved through the preparation of an Infrastructure Schedule);
- A consistent approach to technical evidence and assessment work where appropriate;
- Coordinated infrastructure phasing; and
- Ongoing engagement with the Council and other stakeholders.

The Parties also recognise the importance of establishing a coordinated strategy for a future railway crossing and will continue to engage with Network Rail, West Sussex County Council and Horsham District Council regarding the identification, design, planning strategy, delivery and funding of an appropriate solution. The land, and appropriate designs may be progressed, on the understanding that the key delivery partner is Network Rail.

The approach advocated to enable any footbridge crossing is:

- Any footbridge, including pedestrian/ connectivity to it – factored on the parameter plans/ Masterplan for approval;
- An evidenced justification for the timing / trigger for any footbridge;
- This may possibly be when the 1FE (expandable to 2FE) primary school is practically complete and open;
- Ahead of this, at an agreed point early in the build, the agreed transfer of dedicated land to Network Rail – to safeguard the land necessary to construct any footbridge;
- This land may become part of railway operational land – terms within the agreed transfer;
- A scheme for the funding of the necessary planning application (under the TCPA 1990) or Transport and Works Act Order (under the Transport and Works Act 1992) will be agreed early in the build – to be advanced by Network Rail;
- The scheme to include any process required (in liaison with West Sussex CC) for any minor diversion to the existing public right of way (to the landings – or to include over the new footbridge);
- Fair and reasonable funding for the design and construction of any footbridge – which will be delivered by Network Rail (as part of an approved programme/ business case – justified by funding, safety and operational reasons).

This process will be further discussed with HDC, WSCC and Network Rail, as part of pre-application on the future planning application(s) – with the necessary obligations / contributions agreed as part of the S106 legal agreement(s). Network Rail's response to the Main Modifications is supportive of any future closure of the present at-grade level crossing.

Technical Evidence

Whilst planning application(s) may be prepared separately, through the joint-working arrangements, the Parties intend to coordinate the preparation and review of strategic evidence where appropriate, including:-

- Transport and movement assessments (including sharing / updating of main access designs on the A272 – which is currently underway);
- Environmental and ecological assessments;
- Coordinated approach to EIA scoping – as a Project – north and south of the railway;

- Flood risk and drainage strategies;
- Utilities and infrastructure assessments (noting approach to energy upgrades – suitable for the scale of development);
- Education provision and school planning; and
- Infrastructure delivery and phasing programmes.

This approach will help ensure that the allocation is planned and delivered as a single strategic development notwithstanding separate planning application(s).

Deliverability and Conclusion

The Parties consider that Strategic Policy HA4 is a deliverable and achievable allocation capable of making a significant contribution towards Horsham District's housing and infrastructure requirements during the plan period.

The Parties are committed to:

- The comprehensive delivery of Policy HA4;
- Collaborative working between the land interests north and south of the railway;
- The coordinated planning, funding and phasing of strategic infrastructure;
- Continued engagement with Horsham District Council and other stakeholders; and
- Ensuring that infrastructure requirements support, rather than unnecessarily delay, delivery.
- The below table sets out Crest, Bellway and Richborough's housing trajectories on the basis that the Local Plan will be adopted in early 2027 and the planning application(s) will follow thereafter.

Year	Crest Land Delivery	Bellway Land Delivery	Richborough Land	Total
2028/29		25		25
2029/30	75	75	25	175
2030/31	75	75	150	300
2031/32	100	75	150	325
2032/33	75	75	25	175
				1,000

The Parties will continue to work together to demonstrate the soundness, deliverability and comprehensive planning of the allocation through the ongoing Local Plan Examination process.

END