

CPRE Sussex written statement

Examination of the Horsham District Local Plan 2023-2040

Hearings: Tuesday 13 October 2026

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

Transport and movement

The delivery and funding of the new road, railway bridge and roundabout

1. The structural integrity and ownership of a bridge carrying a road over a railway typically rests with the railway operator, primarily Network Rail on the national network, while the local highway authority or National Highways maintains the road surface and upper fabric. Building or altering a bridge over operational rail land requires close coordination and asset protection approval from Network Rail.

2. Has Network Rail's consent been obtained for the proposed road over railway bridge?

3. Have costings been obtained for the delivery of the proposed new road, the rerouting of the existing B2133, the proposed road-over railway bridge and the proposed roundabout?

4. We draw attention to:

4.0.1 New bridge cost over Peterborough rail line doubles, published 2 October 2018:

<https://www.bbc.co.uk/news/uk-england-cambridgeshire-45720890>

"The cost of a new road bridge over a rail line to cut congestion has more than doubled to £30m. Cambridgeshire County Council said the crossing over the Peterborough to Ely rail line was a "bigger job than first imagined. The original estimated cost for the project was £13.6m, but has risen due to civil engineering challenges, contractor's cost increases and higher land prices".

4.0.2 Northumberland Line: Road bridge costs spiral to £30m, published 12 April 2023

<https://www.bbc.co.uk/news/uk-england-tyne-65243820>

Construction costs for a road bridge on a passenger rail line due to reopen in 2024 have trebled to £30.6m, figures have revealed. “The 18-mile Northumberland Line between Newcastle and Ashington is set to be revived six decades after it was shut. The cost for the bridge at Newsham was estimated at just over £11m in 2021 but inflation has been blamed for the rise.

Northumberland County Council cabinet has now commissioned an "urgent" report agreeing a new funding package. The council's decision comes after the Department for Transport declined to provide funding to close the existing crossing and divert the A1061 across a new bridge over the railway”.

The impact on the road system including the A29, Pulborough and ‘the A2133’ – presumably the B2133.

5. Adversane (Kingswood) residents and businesses would need road connections north towards Billingshurst and Horsham and beyond, 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.

5.1. The B2133 runs from the A24 at Ashington, through Goose Green and Broadford Bridge to Adversane, where it crosses the A29 continuing to the A272 west of Billingshurst and onward to the A281 at Alfold Crossways. Between Goose Green and Broadford Bridge the B2133 meets the B2139 linking Coolham, Thakeham and Storrington

5.2 What additional traffic, including HGV movements, would the proposed settlement or small town at Adversane generate on the A29, B2133, A272, B1239 and the wider road network, and what would its impact be?

Sustainable transport and active travel measures and mitigation measures

6. 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 new settlement/small new town must therefore be judged by the journeys it will generate across the wider road network, not simply by the transport measures within the development.

The provision of social and community facilities

Education

7. Has HDC clearly demonstrated:

-the additional secondary capacity required because of existing and already planned development, including East of Billingshurst;

- how much could be accommodated through expansion of The Weald or other measures;
- how much demand for the proposed new school would instead be generated by new homes built in the plan period. HDC anticipates 1425 new homes will be built; or
- when the proposed Adversane (Kingswood) secondary school would actually be required.

7.1 Allocation of land for a secondary school does not ensure that a school will be commissioned and delivered.

7.2 Experience at North Horsham illustrates the complexity and lead time involved in delivering a new secondary school even after the educational requirement has been established. More recent Bedelands Academy experience is particularly instructive.

7.3 In August 2025 WSCC paused the proposed new secondary school notwithstanding safeguarded land and secured capital funding because forecast demand for places had not materialised (WSCC, "Plans for new Burgess Hill secondary school paused", 8 August 2025).

Impacts and mitigation

Wildlife and Biodiversity

8. Land at Adversane (Kingswood) is functionally linked to The Men's Special Area of Conservation (SAC). Habitats used by Barbastelle at Land at Adversane are protected by the Habitats Regulations.

9. The Mens Special Area of Conservation (SAC) supports an important population of barbastelle bats (*Barbastella barbastellus*).

9.1 The SAC is designated under Article 4(4) of Directive 92/43/EEC for the Annex I habitat: Atlantic acidophilous beech forests with *Ilex* and, occasionally, *Taxus* in the shrub layer (*Quercion roburi-petraeae* or *Ilici-Fagenion*), namely beech forests on acid soils.

And for the Annex II species: Barbastelle bat (*Barbastella barbastellus*).

9.2 Natural England/South Downs National Park: Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol advises:

"Barbastelle roosting within the SAC "rely on land outside of the Men SAC's boundaries. Such land which is required to sustain the bats associated with the SAC is referred to as being 'functionally linked' to the SAC'.

Where impacts to such functionally linked land could result in significant effects to the bat populations associated with the SAC, full consideration needs to be undertaken under the Habitats Regulations (in the same way as habitat in the SAC).

Whilst the European protected species legislation protects the bats and their breeding and resting places, it is the effect of the designation of the SAC that protects, through the Habitats Regulations Assessment process, the habitat of the bats outside the SAC”.

10. Land at Adversane lies approximately 4.1 km from The Mens SAC and is within the SAC’s 6.5 km Key Conservation Area.

10.1. Barbastelle activity has been recorded at Land at Adversane by the Ecology Partnership.

10.2. Habitats used there by Barbastelle are therefore protected under the Habitats Regulations.

11. The stated aim of The Ecology Partnership, ‘Ecology Statement in response to HDC Local Plan Policies Kingswood, Adversane’ (March 2020), is “to provide recommendations for a range of ecological enhancements to be included within the master planning, based on the ecology surveys carried out so far”.

11.1 The Ecology Statement advises that Land at Adversane (Kingswood) “supports the annex II species, the barbastelle bat”. And that Barbastelle bats were noted “to be using the southern most wooded landscape – Beeding’s Copse, with the most number of sound recordings captured along this woodland edge. Additional calls were recorded between Steepwood Copse and Steepwood rough (anabat 3) and the small pocket of woodland by the lake” (Ecology Statement paragraph 2.5).

11.2. The Ecology Statement advises that as Barbastelle are known to be using the site, consideration for foraging areas must be made. The Ecology Statement’s recommendations include:

- Avoidance of removal of trees, hedgerows and woodland;
- Avoidance of removal of foraging or commuting habitats;
- Lighting should be designed to avoid woodlands, tree lines and hedgerows;
- Reconnection of severed habitats where possible;
- Enhance existing habitats;
- Provide landscape buffers;

(Ecology Statement paragraph 3.7)

11.3. The Ecology Statement includes an illustrative master plan Figure 2: Illustrative urban structure (dated May 2019 v4.1) (at page 5). The Statement advises that the plan

shows a new town with green infrastructure at its core. This includes, but not limited to, the retention of significant ecological features (ancient woodland and tree lines) and the inclusion of a range of new habitats created through SUDs, wildflower areas, as well as recreational areas including allotments and orchards” (paragraph 3.23).

11.4 The Ecology Statement also advises that consultation with the LPA is required to review the proposed avoidance and enhancement measures and ensure compliance with the Habitats Regulations (paragraph 3.23).

12. Has HDC reviewed the proposed avoidance and enhancement measures? Will the Ecology Statements recommendations be implemented? Will compliance be monitored?

13. CPRE Sussex suggests that the Ecology Statement reveals that the Site and its habitats including Ancient Woodland, hedgerows and water features, are of more than local importance for Barbastelle and the other bat species and wildlife recorded there in terms of species present and connectivity with the wider area.

14. CPRE Sussex recommends that master plans for the scheme be prepared in consultation with the Sussex Wildlife Trust, the Woodland Trust and the RSPB, Sussex Ornithological Society, the Sussex Bat Group and Sussex Branch of Butterfly Conservation.

Delivery

Master planning

15. New settlements can offer advantages through comprehensive planning and coordinated infrastructure, but those advantages depend fundamentally upon selecting the right location and planning it over an appropriate long-term horizon.

16. The allocation was not part of the submitted spatial strategy. It was introduced only at Main Modifications stage following the Inspector's requirement for additional housing.

17. Are there master plans for Land at Adversane (Kingwood), detailing phasing of infrastructure, schools, the ‘new high street’, ‘local retail centres’, a health centre, a hotel, leisure facilities, a library, a community hall, allotments, green space, sports pitches and play areas, and pedestrian and cycle networks, and employment?

18. Allocating Land at Adversane is not simply a decision about accommodating 1,425 homes before 2040. It establishes the location and basic structure of a town whose development will continue well beyond this Plan and may subsequently expand further. The evidence supporting a decision of this permanence should be correspondingly robust. The evidence is not robust.

19. CPRE Sussex recommends that master plans for the scheme be prepared in consultation with the Sussex Wildlife Trust, the Woodland Trust and the RSPB and Sussex Ornithological Society, the Sussex Bat Group and Sussex Branch of Butterfly Conservation.

The funding and phasing of necessary infrastructure and mitigation measures

20. Will this information be provided for the hearing by HDC?

21. How many new homes must be sold during the plan period for the development to be financially viable?

The identification of any potential impediments

22. The number of homes delivered will ultimately depend on market demand and resulting sales. If sales decline, developers are likely to slow the pace of construction.

23. HDC's Housing Delivery Study recognises the potential for overlap between Adversane and other strategic sites around Billingshurst to reduce sales and consequent build-out rates. It concludes that the West sub-area will need completions to remain near the historical peak and stock growth well above historical levels, describing this as challenging (HDCJB20, paras 3.114 and 4.41).

24. MM227 requires a minimum of 35% affordable housing, and HDC's current viability evidence tests the scheme on that basis (MM227; HDCJB16). However, if the number of market houses built and sold or infrastructure costs depart materially from current assumptions, subsequent viability reassessment could place pressure upon affordable housing and other planning critical obligations.

Site capacity, build out rates and the build out period

25. Delivery in the plan period of 1,425 homes is not guaranteed.

25.1 The number of homes delivered will ultimately depend on market demand and resulting sales.

25.2 Sales are influenced by economic and labour market conditions, housing affordability, mortgage availability and buyer confidence.

25.3 If sales decline, developers are likely to slow the pace of construction.

25.4 Buyers able to secure an affordable mortgage, or purchase without one, may prefer new homes elsewhere, for example the strategic developments proposed for Billingshurst.

25.5 Consequently, delivery in the plan period of 1,425 homes at Land at Adversane (Kingswood) is not guaranteed.

Dr Roger F Smith

Trustee CPRE Sussex

25 September 2026