



Horsham  
District  
Council

# Horsham District Local Plan Examination

## Matters, Issues and Questions

Matter 6b: Strategic Policy HA3: Land North West  
of Southwater

September 2026

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## Strategic Policy HA3: Land North West of Southwater

1. For simplification, Strategic Policy HA3: Land North West of Southwater is referred to as “the policy” in this hearing statement.
2. The site is subject to a live outline application DC/26/0366, which seeks approval for the quantum of development identified in the policy. It is expected that the application will be determined at Planning Committee in late 2026 / early 2027. Where relevant, this hearing statement refers to information submitted as part of the application.
3. Part of the site already benefits from an allocation in the Southwater Neighbourhood Plan (SNP). Of relevance, Policy SNP2, allocates some of the southern part of the site for 422-450 homes (including 72 C2 homes), while Policy SNP3 safeguards land for a secondary school on a portion of the eastern part of the site abutting Worthing Road. Where relevant, the hearing statement refers to these SNP policies.
4. Though a Statement of Common Ground has not been signed between the site promoters and the Council, both parties have liaised during the production of the hearing statements on this matter and are broadly aligned except where indicated.

### i. Transport and movement

#### Highway access arrangements

5. As set out in the policy criterion 7c(iii) (as modified by MM217), at least four new accesses to the development are required to distribute traffic evenly across the development. This includes a new link road between the site and Worthing Road, as specified by the policy criterion 7c(i) (as modified by MM215).
6. The current application is in outline, with the exception of highway access. The proposals are consistent with the policy approach with four access points to the highway, with a further access point for the gypsy and traveller provision.
7. In terms of other road improvements (not including to the Hop Oast Roundabout which is discussed elsewhere in this statement), these are largely identified elsewhere in 7c of the policy and relate to those that are recognised as necessary to create a sustainable development.
8. It is recognised that the County Council has requested additional policy criteria in response to the Main Modification consultation (**Main Modification Comment ID /1592**). The Council is of the view that these are unnecessary as the policy already specifies that improvements would be needed to other A24 junctions as required by West Sussex County Council (criterion 7cii). In addition, Strategic Policy 24 (criterion 3) requires that applications for major development are supported by transport work that needs to address assessed significant impacts on the highways network.

#### The integration of sustainable transport including the completion of the Downs Link and the relationship to the railway stations at Christ's Hospital and Horsham

9. It is the Council's view that the aspirations that informed the policy wording of criterion 7 (inclusive of MM213-MM219) remains appropriate, has (and continues to) inform the evolution of the application and ultimately will enable a sustainable scheme to be delivered.
10. A section of the Downs Link is located within the southern part of the site and enhancements to it is specified in 7b(i) of the policy. The development of the site would increase linkages to the Downs Link, increase surveillance along of the route and increase connectivity between the site and the railway station at Christ's Hospital.

11. At the northern part of the site, a road access is required per policy criterion 7b(ii) to connect the site to Two Mile Ash Road. This will enable connectivity between the site and the railway station. This remains a fundamental part of the proposal and will have benefits for both existing and new residents.
12. Policy criterion 7b(ii) also sets out a requirement for the provision of a new footway and cycleway along Station Road between the site and the railway station, subject to the availability of sufficient highway land. This is being explored through the planning application and negotiations are ongoing. If it is established that the footway cannot be progressed due to land constraints, specific measures could be introduced to improve sustainable travel connectivity along Station Road. Ultimately, the intention of the policy is to improve sustainable movements between the site and the railway station, and this is capable of being achieved.
13. The site allocation includes a parcel of land adjacent to the existing car park at Christ's Hospital for the potential creation of a new car park. Ultimately, the delivery of car parking is dependent on need and negotiations on alternative active travel measures at the station site to be secured in the event that this need is not sufficiently evidenced are continuing as part of the planning application with relevant bodies on this point. Increased cycle storage is considered necessary given the increased population that the proposed development would bring, as well as the improved sustainable transport measures.
14. The wording of 7b(iv) of the policy seeks that options to explore bus services between the site and the station are explored, which has been assessed as part of the application.

## **ii. Design, layout and facilities**

### Physical integration with Southwater and the impact on the village

15. The site is situated immediately north west of the village, abutting the existing built form and Worthing Road in various places along this boundary. It is also immediately north of the Broadacres development, which is being built out by the same developers promoting this site. When developed, the site will form part of a wider strategic scale expansion of Southwater and the built up area boundary has been amended to reflect this on the policies map.
16. In terms of impact on Southwater, the **Strategic Site Assessment (HDCJB14b)** noted a number of positive impacts, primarily due to the provision of education, community and recreation facilities that the wider community could benefit from. Further it noted, as described in more detail in paragraphs above, that the development of the site would increase linkages to Christ's Hospital Station.

### The nature and purpose of the neighbourhood centre and its relationship with Lintot Square

17. The policy sets out in clause 2b (as modified by MM208) that a "neighbourhood centre should be provided, offering appropriate uses, such as leisure, sports facilities, and retail whilst retaining Lintot Square as the primary centre of Southwater."
18. In keeping with the policy provision, the purpose of the neighbourhood centre is to provide everyday facilities to residents of the new development rather than to act as a retail/community hub for Southwater as a whole – which is the role that Lintot Square performs, and would continue to do so after the development was built. A retail impact assessment was submitted as part of the application reinforcing that the provision would not undermine the function of Lintot Square.

### The provision of social and community facilities including the location of the school

19. The allocation identifies two schools, a one form of entry (FE) primary school expandable to two FE and a six FE secondary school expandable to eight FE, based on advice provided by West Sussex County Council, as the Local Education Authority.
20. The location of the primary school is not identified within the policy or other parts of the development plan. However, the Southwater Neighbourhood Plan Policy SNP3 does seek to safeguard a specific

location for a secondary school. The Local Plan does not seek to undermine the Parish Council's wishes and therefore, as stated in paragraph 10.104 (as modified by MM204), desires the secondary school to come forward on the safeguarded land.

21. Notwithstanding the above, it is recognised that planning permission is being sought which includes the school being sited in a different location – to the safeguarded land's northwest. This departure from the development plan is ultimately a matter to be considered when determining the application. From a strategic perspective, the provision of the school would have a positive impact no matter where in the site it is placed and it is not contended that the locating of the school elsewhere than on the safeguarded site would result in the allocation, as a whole, being incapable of being achieved.
22. Social and community facilities are a requirement of the policy – for instance in criterion 2b and 2e and are included to ensure that needs generated by the development of the site are met, whilst also providing facilities that can be used by other residents in Southwater.

### iii. Impacts and mitigation

#### Landscape and the countryside

23. The boundaries of the site allocation have been drawn to reduce landscape impact and reflect the findings of the **Landscape Capacity Study (EN8)**. Additionally, the promoter of the site no longer seeks development of land parcels assessed to have significant landscape impacts and this has been recognised in the **Strategic Site Assessment (HDCJB14b)**.
24. Among other matters, part 3 of the policy identifies that the development landscape-led and highlights key features to be taken into account when developing an application to lessen harmful impacts to the landscape and the wider countryside. This is considered a suitable policy framework to assess the impacts and any mitigation measures in relation to development proposals on this site.

#### Wildlife and biodiversity

25. Part 4 of the policy highlights ecological assets and that proposals for this site must consider as part of an application. This includes specific protections for identified areas of Ancient Woodland, together with the retention and creation of new habitats, and support to deliver priorities identified in Nature Recovery network. The requirements have been informed by the Council's **Strategic Site Assessment (HDCJB14b)**. This is considered a suitable framework to assess the impacts of development on such assets that would help provide the necessary mitigations and enhancement of potential biodiversity impacts.
26. Per MM211, the Council is no longer seeking through the policy a Biodiversity Net Gain (BNG) of 12%. Instead, a 10% BNG is now proposed to be sought, according with legislation and other parts of the plan.

#### Heritage Assets

27. Part 6 of the policy highlights heritage assets within and around the site, reflecting the site assessment work. In particular, the policy identifies Great House Farm (Grade II\*) as being important when considering development on the site, given that it is surrounded by the allocation site. This is considered to be a suitable policy safeguard to ensure that any development proposals consider this historic asset and enable the special interest of the building to be retained.

#### Climate change mitigation, drainage, flood risk, and utilities

28. Part 5 of the policy has been modified by MM212 to align with national policy and no longer sets out detailed requirements of the built form to address climate change, albeit still expects the application to support the transition to net zero. This includes reducing the need to travel, and increasing choice and access to sustainable transport methods as discussed in previous sections of this hearing statement.

29. With drainage, flood risk and utilities, this has been assessed as part of the site assessment work and is not considered that a site specific policy is necessary given that requirements are set out in other parts of the plan. The details would be expected to be supplied as part of any application, which has occurred. There have been no indications from providers that would suggest that utilities cannot be provided to the site.

#### iv. Delivery

##### Masterplanning

30. It is proposed that the indicative masterplan for the site should be removed from the policy, as indicated by MM204 and MM205. The policy expectation is that a comprehensive masterplan is provided at the planning application stage. This has occurred as part of the submission of the planning application for this site.

##### Commencement and build out rates

31. The policy expects that 950 homes are to be delivered within the plan period, with commencement in 2028 and delivery beginning in Q4 2029. It is recognised that the expected date of determination of the planning application has slipped slightly, but it is not considered that this is likely to have a major impact on the delivery rates envisaged.
32. Paragraphs 3.52-3.68 of the Horsham **Housing Delivery Study Update (HDCJB20)** assessed the build out rates assumptions carried forward into the trajectory and judged them to be reasonable taking into account the different options available for the developers to pursue and historic rates of delivery on other sites. The build out rates assumed in the trajectory for this site is shown in Table 1 below.

*Table 1: Assumed build out rates*

|                                      | 29/30 | 30/31 | 31/32 | 32/33 | 33/34 | 34/35 | 35/36 | 36/37 | 37/38 | 38/39 | 39/40 |
|--------------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| <b>Land North West of Southwater</b> | 40    | 70    | 80    | 90    | 90    | 100   | 100   | 100   | 100   | 100   | 80    |

##### Funding and phasing of infrastructure and mitigation measures

33. The development will need to bring forward a range of infrastructure (both on and off-site) and particular pieces of infrastructure are identified within the policy.
34. It is considered that there are two particularly critical pieces of infrastructure that are fundamental to bringing forward development of the site; the secondary school, and improvements to Hop Oast Roundabout. These infrastructure items are highlighted in the **Infrastructure Delivery Plan (IDP) (HDCJB19)** on pages 173-174 and 108-109, respectively.
35. In terms of the secondary school, criterion 2d requires that land and contributions would be required as advised by the Local Education Authority (WSCC). The IDP specifies that the main source of funding would be expected to be S106. The supporting text to the policy states that that expectation is that the school will be delivered in an early development phase.
36. There are ongoing discussions as part of the application, including with WSCC and the site promoter/applicant, regarding the details of when exactly the secondary school would be needed, taking account of projected capacity in existing schools – but it remains the Council's understanding that the secondary school is likely to be required in an early phase of the development. Similarly,

discussions continue on funding mechanisms. It is considered that the policy framework is already operating effectively in facilitating such discussions.

37. In relation to the improvements to the Hop Oast Roundabout, the **Local Plan Transport Assessment (HDCJB15b)** identifies the need for improvements as part of the development. This is expressed in 7c(ii) of the policy (as modified by MM216) and the IDP specifies the main source of funding would be expected to be S106.
38. As with the secondary school, there are ongoing discussions as part of the application to confirm details in relation to the details, timing and funding of such improvements. It is considered that the policy framework has been similarly effective in facilitating such discussions.
39. The Council recognises that the County Council has requested a modification to the policy to insert “*including sustainable transport mitigation of bus safety measures*” in response to the Main Modifications consultation (**Comment ID /1935**). The Council considers this to be unnecessary given that the policy seeks improvements to be sought in consultation with, and as required by West Sussex County Council in any case.

#### [Potential delivery impediments](#)

40. It is not considered that there are fundamental delivery impediments to the development of the site as per the policy requirements. It is recognised that the site is subject to a live application, and to which discussions are ongoing in relation to specific matters as described above. This is to be expected in a proposal of this scale and nature.

## Further Proposed Modifications

41. The Council has read all representations received on this policy, including that from the site promoter e.g. comment ID /1840. The Council does consider it necessary to make further modifications to the policy to clarify the amount of C2 and C3 homes expected to come forward from the development.

| Paragraph/ Policy Number | Suggested Change                                                                                                                                                                                                                                                                                                                                                                                                                                              | Reason                                                                              |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| HA3 2a                   | <p><b>Amend Criterion 2a (as originally modified by MM206) to read:</b></p> <p>Approximately 1000 homes (<del>C2 and C3</del> use classes), <u>with</u> a minimum 35% of <del>which will</del> <u>general occupation homes to</u> be affordable <u>homes</u>, together with provision for young families, older people, <del>and</del> the provision of a permanent Gypsy and Traveller site of 5 pitches <u>and approximately 80 C2 use class units.</u></p> | To make it clear the amount of C2 and C3 uses expected to come forward on the site. |