



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

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

September 2026

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Strategic Policy HA(NP1): Land at Adversane (Kingswood)

1. For simplification, Strategic Policy HA(NP1): Land at Adversane (Kingswood) is referred to as “the policy” in this hearing statement.
2. At the time of writing this hearing statement, the site is not subject to a live planning application. However, through liaison with the site promoters and as indicated in the evidence base, a planning application is expected by the end of the year.
3. 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 in agreement with the content with each other’s statements.

i. Transport and movement

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

4. The railway bridge and the related highway improvements are integral to the allocation. The site is divided into two sections (a large eastern section and a smaller western section) by the Arun Valley railway line which runs broadly north to south through the land parcel.
5. The railway bridge is a requirement of 6dii of the policy and is expected to be delivered in the initial phase of development. The site promoters have worked with Network Rail and West Sussex County Council (WSCC) on the siting and design of the bridge through the Basic Asset Protection Agreement route.
6. Discussions held between HDC and Network Rail have indicated it is unusual for promoters to have developed the design of a railway bridge in the manner that has occurred ahead of securing a planning permission. This gives the Council further confidence that it would come forward in a timely manner.
7. The railway bridge would form the central part of a road linking the B2133 and A29 that would go through the site. A roundabout on the A29 and an access on the B2133 would be created to enable this per 6di and 6diii of the policy. It is the expectation that the railway bridge and accesses would be created at the first phase of development.
8. As identified in pages 114-116 of the **Infrastructure Delivery Plan (IDP) (HDCJB19)**, the railway bridge is expected to be funded and delivered by the developer. It is recognised that other parties consider that the cost of the bridge to be understated compared to the “around £15 million” expressed in paragraph 3.97 of the **Housing Delivery Study Update (HDCJB20)**. Through liaison with the site promoters, the Council is aware that the projected cost of the bridge may have increased – albeit not to the extent suggested by other parties.
9. Collectively the bridge and road infrastructure would enable the closure of the existing level crossing on the B2133 (6d(iv) of the policy), which is an outcome that Network Rail suggest is necessary for the site to accommodate development. The precise trigger for when the crossing would be closed is something for a planning application to resolve – but the policy framework highlights that this will be required to be confirmed at the application stage as informed by the Local Highway Authority (WSCC) and Network Rail. In recognition that the site promoter/applicant is not in control of the railway crossing, they have suggested (**comment ID /1759**) modified wording to the policy that makes apparent that they can facilitate and enable the closure of the crossing but that they cannot deliver it themselves. HDC accept this and have suggested a further modification to reflect this fact, which is set out in at the end of this hearing statement (Modification reference 9).
10. Connected with the above, HDC recognises that Network Rail, as part of their representations (**comment ID /914**) recommend changing the existing wording that reads “*which is likely to see the*

existing level crossing closed” within paragraph 7 of the supporting text to “*which would facilitate the closure of the existing level crossing*” to remove any ambiguity about this issue. HDC is proposing a further modification to the policy wording as a result (Modification reference 3) and this is set out at the end of this hearing statement.

The impact of the road system including the A29, Pulborough and the A2133

11. As stated above and within the policy (criterion 6d(iv)), it is the expectation that the development would lead to the closure of the existing level crossing. The existing B2133 (Adversane Lane) would therefore be diverted through the new settlement and link with the A29 (Stane Street) via a roundabout at a location south of the existing junction.
12. With regards to the impact on Pulborough, criterion 6d(vi) of the policy currently specifies that improvements would be needed around the mini roundabouts at Pulborough. The **Transport Assessment (HDCJB15b)** notes that the mini roundabouts would be over capacity irrespective of what is proposed in the Local Plan but comment on page 44 that there was “*limited opportunity to provide physical highway mitigation within Pulborough, due to lack of space and constraints created by building located close to the roadside*” and recognised that sustainable measures along the route could provide mitigation.
13. HDC is therefore proposing a further modification to criterion 6d(vi), to clearly specify the policy requirement and this is set out at the end of this hearing statement (Modification reference 10). This aligns with the representation made by the site promoter (**comment ID /1759**). It is proposed that the policy is further amended to recognise that the measures may enhance active travel facilities in the area around the mini roundabouts – which align with WSCC’s representation (**comment ID /1502**).
14. Separately, it is recognised that WSCC in their representation (**comment ID /1487 and /1502**) have suggested that an existing issue caused by a landslip on the A29 at Church Hill, Pulborough needs to be recognised in the policy and have suggested a modification in the form of an additional set of policy criteria (and related wording in the supporting text), if temporary measures (signal controlled one-way movements) were to become permanent, setting requirements relating to this part of the road network.
15. Following further discussions in relation to this matter with WSCC, it is neither HDC’s or WSCC’s view that the current situation (i.e. single traffic flow) represents a showstopper to the proposed allocation. Subsection 5.3 (page 45 and onwards) of the **Transport Assessment (HDCJB15b)** demonstrates that a specific sensitivity test, accounting for the current situation, has been undertaken. The results indicated that some will use less suitable alternative routes and this situation would worsen once development is fully built out.
16. Secondly, the County Council have confirmed with HDC that they are actively working to resolve the situation and revert the highway back to its previous position. It is accepted that precise details and timings are not known at the time of writing this hearing statement.
17. Notwithstanding that HDC do not consider it would be appropriate to introduce the detailed wording suggested by WSCC, it is considered that there is merit in introducing wording within paragraph 7 the supporting text and policy (as a new criterion) to ensure that the current operation of the corridor is taken into account in any transport assessment undertaken by the site promoters as part of the application process and assessed impacts are mitigated and monitored. The modifications are proposed at the end of this hearing statement (Modification references 4 and 12, respectively).
18. In addition, WSCC has requested that a policy criterion is added to highlight that the site should make proportionate contributions to public transport/active travel improvements that reduce impacts through the Five Oaks Road/A264 Western arm of the A264/A281 South of Broadbridge Heath roundabout. This is considered to align with the findings of the Council’s **Transport Assessment (HDCJB15b)** and HDC has recommended a further modification as a new criterion (6vii). This is set out at the end of this hearing statement (Modification reference 11).

Sustainable transport and active travel measures and mitigation measures

19. Sustainable and active travel measures are included within the proposed policy wording to ensure that walking and cycling is encouraged within the development and integrated with the wider transport network (criterion 6a), and that bus services are provided to higher order settlements (criterion 6b). Through liaison with the site promoters and partner bodies, it is expected that these requirements would be realised through the detailed planning application and delivery stages.
20. The site promoters have highlighted that the policy as, currently worded in criterion 6a and supporting text paragraph 6, would suggest that walking and cycling would be prioritised in all instances and that this may not be appropriate on all routes. WSCC identify that the policy wording should reference wheeling and identify that the policy should highlight that connections to be introduced should include those that relate to existing bus stops, Brinsbury College, Billingshurst Rail Station and along the A29 corridor to Pulborough.
21. HDC broadly agree with the above and has suggested further modifications to the supporting text criterion 6a to address these points, and as set out at the end of this hearing statement (Modification references 2 and 7, respectively).
22. It is recognised that the site promoters have requested relatively minor changes to the policy (criterion 6b and related supporting text paragraph 6) to clarify that the site may not necessarily deliver new services but enhanced services (a point also made in the WSCC representation), that bus services may not go direct to Horsham station and that bus access will be prioritised over cars where appropriate. HDC has suggested further modifications to paragraph 6 (Modification reference 2) of the supporting text and criterion 6b (Modification reference 8), and these are set out at the end of this hearing statement.

ii. The provision of social and community facilities

Health

23. Although the site promoters have shown a willingness to provide health care facilities within the site, the provision and timing of such facilities is a matter for the NHS Sussex Integrated Care Board (ICB). The ICB have not indicated that such a facility is necessary within the site. However, the wording of criterion 2f of the policy is sufficiently flexible to ensure that the allocation contributes financially and/or by providing appropriate facilities to ensure that the needs of occupants are met.

Education

24. Criteria 2e(i-v) requires that education provision (land and contributions) is to be delivered throughout the site, as advised by the Local Education Authority (currently WSCC).
25. Criterion 2e(i) currently seeks a 2FE (capable of expansion to a 3FE) primary school to be delivered at an early phase of development. HDC is aware that WSCC have requested a change to this criterion to make clear that a 3FE is required to accommodate needs generated by the development. Further liaison with WSCC suggests that this school may not be required at an early phase of development as identified by the current policy wording.
26. Given the above, HDC is proposing a further modification to criterion 2e(i) (Modification reference 5) to reflect the latest position from WSCC. This is set out at the end of this hearing statement.
27. Criterion 2e(ii) seeks the provision of a second primary school, should the need for it be evidenced. This is considered an appropriate policy safeguard that ensures that needs of new residents for primary education are met should it be required.
28. Criterion 2e(iii) seeks the provision of a 6FE secondary school (capable of expansion to 8FE) within the site. Not only would this meet the needs of new residents but would help address existing

secondary provision capacity issues in the west of the district. The policy provision reflects advice provided by WSCC and liaison with the site promoters recognise the importance of the school's delivery.

29. Criterion 2e(iv) seeks nursery provision to be provided within or separate to the primary schools to be provided to ensure that generated needs are addressed. The Council is aware that WSCC wish for this criterion to be amended (per **Main Modification Comment ID /1502**) to read "suitable nursery provision to be provided in new full-day care settings, located adjacent to, or combined with, primary school sites."
30. It is understood that having nursery provision within or adjacent to primary schools may well be beneficial for the Local Education Authority and that full-day care provision is likely to be preferable for many families. Notwithstanding this, it is felt that the suggested modifications would not be sound. The proposed change would prevent nursery provision coming forward until such a time as a primary school is operational – which would not be desirable if nursery provision could otherwise be provided ahead of this time. It also would also appear to prevent independent nursery proposals from coming forward, which HDC would not seek to restrict.
31. Accordingly, whilst sympathetic to WSCC's position, HDC does not propose to further modify the policy. It is considered that the current wording is suitably flexible whilst still allowing nursery provision to come forward in the manner preferred WSCC.
32. Criterion 2(v) ensures that suitable post-16 provision would be provided but is flexible about the way in which it is delivered. This is considered appropriate and details would be expected to be agreed as part of relevant planning applications with WSCC.

Retail

33. The policy assumes that retail needs generated by the development will be met in the neighbourhood centre and in secondary centres throughout the site. The scale of the retail offer would be proportionate to the size of the settlement and does not intend to compete with the offer in Billingshurst, Pulborough or other settlements further afield.

iii. Impacts and mitigation

Landscape and the countryside

34. Page 3 of the **Strategic Site Assessment (HDCJB14b)** recognises that development of the site has the ability to negatively impact the landscape. It recognised, among other matters, that development has the potential to impact the South Downs National Park. Notwithstanding this, the **Landscape Capacity Study (EN8)** identifies the site as having moderate capacity to accommodate strategic scale development without adverse impacts, subject to suitable design and mitigation measures.
35. Accordingly, part 3 of the policy requires a landscaping strategy to be submitted as part of a planning application and demonstrate that the impact to the landscape from development proposals would be minimised. Criterion 3a highlights the relationship of the site with the South Downs National Park – a policy criterion supported by the South Downs National Park Authority (SDNPA) (per **Main Modification Comment ID /696**).
36. It is considered that the policy framework put forward is sound and ensures that it will help ensure that the design and layout of the scheme is landscape led. Despite this, HDC recognises that part 3 of the policy could be enhanced to require that the scheme is informed by a Landscape and Visual Impact Assessment – as suggested by SDNPA, and this has been proposed as a further modification (Modification reference 6), as set out at the end of this hearing statement.

Wildlife and biodiversity

37. The site assessment (**HDCJB14b**) identified biodiversity assets, including the presence of ancient woodland, within the site. Criterion 3d seeks to address this matter by requiring ancient woodland in the site to be retained as part of any development proposals – which is reiterated in criterion 2gi and 4a. Further, Strategic Policy 17 also ensures that suitable buffers are placed between the ancient woodland and any development.
38. Similarly ecological work already undertaken identified protected species and habitats throughout the site. Whilst development will impact on the existing ecological features, it is considered that the criteria within part 4 of the policy is a sound policy framework to ensure that the development of the site will retain and create ecological assets, assisting in the achievement of at least a 10% Biodiversity Net Gain (BNG).

Heritage assets

39. The site assessment recognises the presence of heritage assets within and around the site, including the Adversane Conservation Area and the Archaeological Notification Area. These are respectively highlighted in criteria 3b and 3e of the policy to mitigate harm to the historic environment and assets, which is considered to be an appropriate policy framework to address this matter.

Climate change mitigation, drainage, flood risk and utilities

40. Part 5 of the policy is consistent with other strategic site policies in the plan and seeks 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 throughout section i of this hearing statement.
41. Drainage, flood risk and utilities have been assessed as part of the site assessment process. It is not considered that a site specific policy is necessary on these matters given that requirements are set out in other parts of the plan. It is recognised that the **IDP (HDCJB19)**, highlights some electricity constraints in the west of the district, but it is acknowledged that, per the site promoter's representation (**Main Modification Comment ID /1759**), that this is not an impediment to the site's delivery and that energy supply has already been secured to enable the first phase of development to come forward with further reinforcement of the network planned.
42. Similarly, though the Council is aware that Southern Water (**Main Modification Comment ID /373**) may wish to impose conditions on an application to limit occupation of the development pursuant to the delivery of water infrastructure. Precise triggers and wording of conditions would be expected to be included, if necessary, after the assessment of a planning application.

iv. Delivery

Masterplanning

43. An indicative masterplan is not included in the policy. The policy expectation is that a comprehensive masterplan is provided at the planning application stage.

The funding and phasing of necessary infrastructure and mitigation measures

44. As is discussed above, the railway bridge, related road access and connections with the A29 and B2133 are expected to come forward as part of the first phase of development. This would be funded and delivered by the site promoters themselves. Together, such measures will facilitate the closure of the existing crossing.
45. Neither the site promoters nor HDC can control when the existing level crossing is closed and such details would be confirmed during the application process in consultation with WSCC and Network Rail – as set out in policy criterion 6d(v). Such information is identified in the **IDP (HDCJB19)** (pages

114-116) and a further modification has been proposed earlier in this hearing statement to clarify that the site promoter cannot control the closure of the crossing.

46. In terms of education, the policy seeks land and contributions from the development of the site as identified in pages 179-181 of the **IDP (HDCJB19)**. The detailed phasing for such provision will be informed by WSCC, as the Local Education Authority, and determined as part of planning applications.

The identification of any potential impediments

47. The policy, as discussed elsewhere in this hearing statement, identifies that development will be reliant on various pieces of infrastructure and improvements to existing infrastructure. The delivery of this infrastructure has been informed by detailed discussions with key infrastructure providers, which will continue as the scheme progresses. It is not considered that there are fundamental delivery impediments to the development of site. It is recognised that development and infrastructure would need to be phased, with precise triggers (e.g. how many homes could be occupied prior to certain pieces of infrastructure coming forward) to be determined at the application stage.

Site capacity, build out rates and the build out period

48. The policy expects that the site would deliver 3,200 homes, of which at least 1,425 homes would be provided within the plan period. It is acknowledged that the site promoters suggest that around 2,000 homes could be supplied within the plan period and the policy does not prevent such a scale of development from coming forward in the period to 2040.
49. Paragraphs 3.95 to 3.115 of the Horsham **Housing Delivery Study Update (HDCJB20)** has considered the information put forward by the site promoter. It considered that it was more realistic to assume that completions would start in 2030/31 (a year later than suggested by the site promoters) and should account for the possibility that delivery rates could be impacted by development of sites in Billingshurst. Accordingly, HDC is of the view that the 1,425 homes identified in the policy as coming forward within the plan period is realistic and thus does not seek to modify the policy wording.

Table 1: Assumed build out rates

	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
Land at Adversane	50	100	125	150	150	150	175	175	175	175

50. It is however acknowledged that paragraph 3 of the supporting text refers to 1,500 homes being delivered within the plan period. This is a drafting error and a further proposed modification (Modification reference 1) has been set out at the end of this hearing statement to address this.

Further Proposed Modifications

51. Further modifications to the policy (MM227) have been suggested above in the hearing statement and are set out in the table below.

Modification Reference Number (within this hearing statement)	Paragraph/ Policy Number	Suggested Change	Reason
1	Paragraph 3	Amend second sentence of paragraph 3 to read: “Given that the site will be a new settlement, the lead in times necessary to bring forward this development, together with delivery of the necessary infrastructure requirements, mean that the level of housing that can be delivered within the plan period is anticipated to be around ~~4,500~~ <u>1,425</u> homes.”	To set out correct delivery expectations.
2	Paragraph 6	Amend paragraph 6 to read: “The site is of a scale which provides an opportunity to achieve a degree of self-containment, with a number of day-to-day journeys being made locally and by sustainable means. A relatively dense form of development will enable this, and it will be important for the development to locate places of work, shops and community facilities to maximise convenience of travel within the site. To promote sustainable and active travel modes, the scheme design will prioritise movement within the site by walking, cycling and wheeling, <u>where appropriate</u> ~~with motor vehicles being required to give way to non-motorised traffic on most routes~~. Walking and cycling routes should seek to include off-road provision and 5km exercise circuits to help promote healthy lifestyles. For longer journeys, direct bus services will be <u>in place</u> ~~established~~ to larger nearby settlements (in particular Billingshurst and Horsham). Bus access will be prioritised over private cars <u>where appropriate</u>. For private car travel, homes and businesses will be designed to facilitate electric vehicle use and ownership as the norm. Land will be safeguarded for a new railway station in order to ensure that opportunities can be taken advantage	To clarify that not sustainable and active travel will be prioritised where appropriate and that bus services will need to be in place but don't necessarily need to be new services.

Modification Reference Number (within this hearing statement)	Paragraph/ Policy Number	Suggested Change	Reason
		of to establish rail service, but the new settlement is not reliant on the delivery of such service.”	
3	Paragraph 7	Amend second sentence of paragraph 7 to read: “This would involve the creation of a new road from the A29 to the B2133, enabled by the creation of a railway bridge and new roundabout, which ~~is likely to see~~ <u>which would facilitate the closure of the</u> existing level crossing ~~closed~~.”	To clarify that the new road and bridge would be expected to facilitate the closure of the existing crossing.
4	Paragraph 7	Insert as the final sentence of paragraph 7: <u>“Development will be expected to assess, mitigate and monitor its highway impacts, taking account of the temporary capacity restriction on the A29 at Church Hill, Pulborough, should the one-way working operation on a section of this corridor still be in effect.”</u>	To make clear that the current operation of the A29 at Church Hill, Pulborough is taken into account when preparing applications.
5	Criterion 2e(i)	Amend criterion 2e(i) to read: “A ~~2 3~~ form entry primary school, ~~capable of expansion to 3 forms of entry,~~ to incorporate a support ~~centres~~ <u>centre</u> for special educational needs (SEND) ~~to be delivered at an early phase of development;~~”	To clarify the size requirements for the primary school.
6	Criterion 3	Amend second sentence of criterion 3 to read: “Prior to any development a site-wide landscaping strategy shall be submitted and agreed, <u>as informed by a Landscape and Visual Impact Assessment.</u>”	To enhance the policy requirement and to ensure that the landscaping strategy is evidenced.
7	Criterion 6a	Amend criterion 6a to read: “A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority <u>where appropriate</u> over motorised traffic,	To clarify that not sustainable and active travel will be prioritised where appropriate

Modification Reference Number (within this hearing statement)	Paragraph/ Policy Number	Suggested Change	Reason
		and integrated with the existing and wider network, will be delivered and maintained, <u>which will include connections to Brinsbury College, Billingshurst train station and along the A29 corridor towards Pulborough</u> "	and highlight specific linkages.
8	Criterion 6b	Amend criterion 6b to read: "A bus strategy to demonstrate the feasibility of new <u>and/or enhanced</u> bus services that can be sustained over the long term and that, as a minimum, provide: i) upfront incentives to new residents to use new and existing bus services; and ii) convenient, frequent ~~and bus~~ <u>and public transport</u> connections to nearby places including Billingshurst (including the train station) and Horsham (~~including the train station~~); "	To clarify hat bus services will need to be in place but don't necessarily need to be new services and to highlight that such services do not need to go to Horsham train station given that Billingshurst train station has services to Horsham.
9	Criterion 6d(iv)	Amend criterion 6d(iv) to read: <u>"Facilitate and enable, through the provision of the railway bridge, the</u> ~~The~~ closure of the existing level crossing on the B2133 to provide safety benefits"	To clarify that the closure of the crossing is related to the delivery of the railway bridge but that the applicants themselves cannot control its closure.
10	Criterion 6d(vi)	Amend criterion d6(vi) to read: <u>"Appropriate measures</u> ~~Improvements~~ around the A29/A283 mini roundabouts at Pulborough to ensure an acceptable traffic flow <u>and enhance active travel facilities</u>"	To clarify policy requirements and that the policy seeks to have benefits for motorised traffic and active travel.
11	NEW – Proposed	Introduce criterion 6d(vii) to read:	To reflect the findings of the

Modification Reference Number (within this hearing statement)	Paragraph/ Policy Number	Suggested Change	Reason
	criterion 6d(vii)	<u>“Proportionate contributions towards enhanced public transport and active travel facilities to reduce impacts through the Five Oaks Road/A264 Western arm of the A264/A281 South of Broadbridge Heath Roundabout.”</u>	transport evidence.
12	NEW – Proposed criterion 7	Introduce criterion 7 to read: <u>“Proposals should take account of the one-way working operation on a section of the A29 at Church Hill, Pulborough, should it still be in effect, in developing its transport strategy and, if necessary, mitigate and monitor assessed temporary impacts on the A29 and surrounding routes, as advised by the Local Highway Authority.”</u>	To make clear that the current operation of the A29 at Church Hill, Pulborough is taken into account when preparing applications.