



Ashington Parish Council

Telephone: 07851 009655

Email: clerk@ashingtonpc.org.uk

www.ashingtonpc.org.uk

EXAMINATION OF THE HORSHAM DISTRICT LOCAL PLAN 2023–2040

Hearing statement on behalf of Ashington Parish Council

Matter 6: The Soundness of the Site Allocations

Matter 6g: HA5 Ashington – Site ASN2 only

Representor: Ashington Parish Council

Representor ID: 52234689

Main Modification: MM229

1. Introduction and soundness case

1.1 Ashington Parish Council (“the Parish Council”) objects to Main Modification MM229 insofar as it proposes the allocation of the Ashington Northern Cluster (ASN2), approximately 25 hectares, for 450 homes.

1.2 This statement develops the Parish Council’s original representation on MM229. It does not introduce a materially new case and is confined to the issues identified by the Inspector for Matter 6g.

1.3 In accordance with the Inspector’s announcement of 16 September 2026, the applicable national policy is the **September 2023 National Planning Policy Framework (“NPPF”)**.

1.4 The Parish Council’s objection principally concerns whether ASN2 has been demonstrated to be **justified** and **effective**. Paragraph 35 of the NPPF requires the Plan to represent an appropriate strategy, taking account of reasonable alternatives and based on proportionate evidence, and to be deliverable over the plan period. Paragraph 31 requires policies to be supported by relevant and proportionate evidence.

1.5 The Parish Council accepts that Ashington should make a proportionate contribution to housing delivery and supported the principle of the smaller ASN1 allocation at Regulation 19 stage. Its objection is therefore not to housing growth at Ashington in principle, but to whether an additional 450 homes at ASN2 has been sufficiently justified and whether Policy HA5 provides an effective framework for sustainable delivery.

1.6 The made Ashington Neighbourhood Plan provides for a minimum of 225 homes, ASN1 proposes a further 75 homes, and ASN2 would add 450 homes. The cumulative planned provision is therefore at least 750 homes.

1.7 As set out in the Parish Council's MM229 representation, this represents a substantial increase in the size of Ashington. The relevance of that scale is not the percentage increase in isolation, but whether its cumulative consequences for transport, services, infrastructure, settlement integration and the environment have been adequately assessed and can be effectively mitigated.

1.8 Earlier assessment did not select the Northern Cluster for allocation, because of concerns regarding cumulative effects on infrastructure and services and the scale of development in relation to Ashington. The Parish Council accepts that changed circumstances justify reconsideration of the site. The relevant soundness question is whether the updated evidence now demonstrates that the previously identified constraints have materially changed, been overcome, or can be satisfactorily mitigated.

1.9 The Parish Council does not suggest that detailed scheme design or every infrastructure specification must be determined through the Local Plan. Its concern is that the **strategic requirements upon which the acceptability and deliverability of the allocation depend, and the mechanisms for coordinating and delivering them, must be established with sufficient certainty at plan-making stage.** Detailed implementation may properly follow through subsequent planning applications.

2. Transport and movement

Highway access arrangements

2.1 Paragraph 104 of the NPPF requires transport issues to be considered from the earliest stages of plan-making so that impacts on transport networks can be addressed. Paragraph 110 requires safe and suitable access and appropriate mitigation when sites are assessed for allocation.

2.2 The transport assessment should consider cumulatively the Neighbourhood Plan development, ASN1, ASN2 as a whole, committed development and background traffic growth affecting Rectory Lane, Billingshurst Road, London Road, Church Lane and their connections with the A24.

2.3 The updated Site Assessment indicates that vehicular access may be obtained from Rectory Lane and/or the B2133 as appropriate to individual development

parcels. That does not itself establish a coordinated highway-access strategy for the allocation as a whole.

2.4 Where separate parcels may progress independently, the access hierarchy, relationship between accesses, internal connections, cumulative junction effects, road-safety implications and necessary mitigation should be established at allocation-wide level.

2.5 The current outline applications within ASN2 are referred to only insofar as they illustrate the practical importance of establishing that strategic framework before substantial individual parcels determine the eventual access arrangements.

2.6 Soundness: The Parish Council considers that the evidence and policy do not yet provide sufficient certainty to demonstrate that the highway arrangements for ASN2 are **justified and effective**. If retained, the allocation should be supported by an approved site-wide access and movement strategy.

Integration of sustainable transport

2.7 Paragraph 105 of the NPPF requires significant development to be focused on locations which are, or can be made, sustainable through limiting the need to travel and offering a genuine choice of transport modes, while recognising that opportunities differ between urban and rural areas.

2.8 Ashington has no railway station, GP surgery or secondary school and has limited local employment and public transport. Residents therefore need to travel outside the village for a significant proportion of everyday needs.

2.9 The issue is not whether walking, cycling or public-transport improvements could theoretically be provided, but whether the evidence demonstrates how a further 450 homes can be made sustainable in transport terms and how the necessary measures will be delivered.

2.10 Policy HA5 does not presently identify with sufficient clarity the sustainable-transport measures required specifically for ASN2, their funding, timing or delivery triggers.

2.11 Soundness: Without greater certainty on those matters, the Parish Council considers that the allocation has not yet been demonstrated to be **justified and effective in transport terms**.

3. Design, layout and facilities

Physical integration with Ashington and the impact on the village

3.1 ASN2 would represent a substantial extension to Ashington. Physical adjacency to the existing built-up area does not itself demonstrate successful integration.

3.2 The assessment must consider how development relates to the established village structure, movement patterns, community facilities, countryside edge and access to services.

3.3 The made Ashington Neighbourhood Plan remains relevant evidence of the established settlement strategy. The Parish Council does not contend that it prevents further development. Rather, the scale now proposed requires clear evidence of how ASN2 would integrate successfully with that strategy.

3.4 Paragraphs 126–130 of the NPPF emphasise well-designed places that function effectively, respond to local character and landscape and support local facilities and transport networks.

3.5 For an allocation of this scale and divided into several parcels, those objectives require a coherent site-wide framework before individual parcel layouts become fixed.

3.6 Soundness: The Parish Council considers that successful physical integration depends upon comprehensive masterplanning being established before substantive development of individual parcels. Without that certainty, the effectiveness of the allocation is not demonstrated.

Provision of social and community facilities, open space, sport and recreational facilities

3.7 Paragraph 34 of the NPPF requires plans to set out expected contributions from development, including infrastructure for education, health, transport, flood and water management and green infrastructure.

3.8 The updated evidence identifies opportunities for community facilities, medical provision, open space, sport and recreation. However, identifying potential provision is not the same as demonstrating that necessary infrastructure is deliverable and will be available when required.

3.9 Policy HA5 does not presently establish with sufficient certainty:

- a. what additional education, healthcare and community provision is required;
- b. the scale and location of open-space, sport and recreational provision;
- c. responsibility for delivery;
- d. funding mechanisms; or
- e. the development or occupation thresholds at which provision must be available.

3.10 Ashington has no GP surgery. Education requirements must also be considered against the cumulative growth now proposed, rather than solely the level of development anticipated when the Neighbourhood Plan was prepared.

3.11 Soundness: The Parish Council considers that greater certainty over social, community, recreational and open-space provision is necessary if ASN2 is to be demonstrated to be **effective and deliverable**.

4. Impacts and mitigation

Landscape and the countryside

4.1 ASN2 comprises approximately 25 hectares of countryside outside the existing built-up area.

4.2 The Parish Council does not contend that landscape effects are incapable of mitigation. Its concern is that the necessary landscape principles should be established comprehensively before individual parcels determine the eventual settlement edge.

4.3 A site-wide framework should establish the retention and buffering of important trees and hedgerows, treatment of field boundaries, key views, appropriate density and building heights, green infrastructure and a defensible long-term settlement edge.

4.4 Soundness: Where landscape mitigation is material to the acceptability of ASN2, the mechanisms for securing it at allocation-wide level should be sufficiently clear for the allocation to be effective.

Wildlife and biodiversity

4.5 Paragraphs 174 and 179 of the NPPF require planning policies to protect and enhance the natural environment and wider ecological networks, including wildlife corridors and stepping stones.

4.6 ASN2 contains hedgerows, treelines, ponds, watercourses and other habitats. The relevant issue is therefore wider than the treatment of individual features within separate application boundaries.

4.7 A site-wide ecological framework should establish habitat networks, buffers, corridors, mitigation and strategic green infrastructure before individual layouts are fixed.

4.8 Soundness: Without coordinated assessment and mitigation, separate parcels could individually provide mitigation while cumulatively fragmenting ecological connections. The effectiveness of the allocation therefore depends upon whole-site ecological coordination.

Heritage assets

4.9 ASN2 must also respond appropriately to relevant heritage assets and their settings, including the Church of the Holy Sepulchre and nearby listed buildings.

4.10 The Parish Council does not contend that heritage impacts necessarily prevent development. The cumulative effect of the allocation should, however, inform the location, scale, landscape treatment and form of development before individual parcels are fixed.

4.11 Soundness: Heritage considerations should therefore form part of the allocation-wide masterplanning framework rather than being resolved solely through uncoordinated parcel-level proposals.

Climate change mitigation, drainage, flood risk and utilities

4.12 Paragraphs 159–161 of the NPPF require a sequential, risk-based approach to flood risk, including consideration of all sources of flooding and cumulative effects.

4.13 The evidence identifies surface-water flood risk affecting parts of ASN2. Given the division of the allocation into separate parcels, drainage should be planned comprehensively.

4.14 A site-wide drainage framework should address sustainable drainage, exceedance routes, downstream effects, climate-change allowances, discharge arrangements and long-term maintenance.

4.15 Climate-change mitigation should also be addressed through the strategic layout, including sustainable movement and green infrastructure.

4.16 The Infrastructure Delivery Plan identifies water and wastewater infrastructure relevant to the allocation. Where occupation depends upon network reinforcement or additional capacity, that dependency should be reflected expressly in phasing and occupation triggers.

4.17 Soundness: These constraints may be capable of mitigation, but their resolution depends upon coordinated whole-site planning and infrastructure delivery. The Parish Council considers that the effectiveness of MM229 depends upon those strategic requirements being secured before individual parcels are substantially committed.

5. Delivery

Masterplanning

5.1 Comprehensive masterplanning is central to the soundness of ASN2 because the allocation comprises several development parcels and land interests.

5.2 HDC's own updated evidence recognises the risk that ad hoc development could prejudice comprehensive development, lead to inefficient land use and undermine good placemaking.

5.3 Policy HA5 requires a comprehensive site-wide masterplan. The Parish Council supports that principle. The issue is whether the policy provides sufficient certainty about how and when it will operate.

5.4 HA5 does not establish clearly:

- a. when the masterplan must be approved;
- b. its status and approval mechanism;
- c. whether it must precede substantive permission for individual parcels;
- d. how separate landowners and parcels will be coordinated;
- e. the strategic infrastructure and mitigation it must secure; or
- f. how individual development will be required to comply with it.

5.5 These are not detailed development-management matters. They concern whether the allocation can be comprehensively delivered at all.

5.6 Soundness: Because HDC's evidence identifies comprehensive planning as necessary to avoid piecemeal development, the absence of a sufficiently certain mechanism goes directly to the **effectiveness** of MM229.

Commencement and build-out rates

5.7 The soundness of ASN2 also depends upon realistic assumptions about commencement and build-out within the plan period.

5.8 Multiple parcels may allow parallel delivery, but they may also create dependencies where housing relies upon common access, utilities, drainage, mitigation or infrastructure.

5.9 The delivery assumptions should therefore demonstrate that the required masterplanning and infrastructure can be completed in time to support the assumed commencement and build-out trajectory.

5.10 Soundness: The Parish Council does not assert that the Council's trajectory is necessarily unachievable. It considers that the assumed delivery rate must be supported by evidence showing that the strategic dependencies identified for ASN2 are compatible with that trajectory.

Funding and phasing of infrastructure and mitigation measures

5.11 An ASN2-specific infrastructure delivery and phasing schedule should identify:

- a. strategic transport and access works;
- b. education, healthcare and community provision;

- c. open-space, sport and recreational infrastructure;
- d. drainage, water and wastewater infrastructure;
- e. landscape, ecological and heritage mitigation;
- f. responsibility and funding; and
- g. the development or occupation triggers for delivery.

5.12 This is particularly important where different parcels may be required to contribute towards infrastructure serving the allocation as a whole.

5.13 Soundness: Without clear funding and phasing arrangements, there is a risk that housing is delivered ahead of necessary infrastructure or that strategic requirements fall between individual landowners. That goes directly to whether the allocation is **effective**.

Potential delivery impediments

5.14 The principal potential impediment is coordination of multiple land interests with common infrastructure and mitigation requirements.

5.15 Other dependencies include transport improvements, education provision, utilities capacity, drainage, ecological mitigation and community infrastructure.

5.16 The Parish Council does not suggest that these matters necessarily make ASN2 undeliverable. Its concern is that the Plan must demonstrate how they will be resolved if the allocation is to satisfy the effectiveness test.

5.17 The progression of separate planning applications within ASN2 illustrates why the mechanisms for comprehensive delivery need to be settled before substantial parts of the allocation become independently committed.

5.18 Soundness: Until the masterplanning, infrastructure, phasing and coordination mechanisms are sufficiently certain, the Parish Council considers that effective delivery of the allocation has not been demonstrated.

6. Overall conclusion on soundness

6.1 The Parish Council does not contend that every constraint identified above is incapable of mitigation, nor that detailed development-management matters must be resolved through the Local Plan.

6.2 Its case is that the acceptability and deliverability of ASN2 depend upon a number of **strategic matters**—particularly transport, comprehensive masterplanning, infrastructure, environmental mitigation and phasing—which HDC's own evidence identifies as requiring coordination across the allocation.

Justified

6.3 The Parish Council considers MM229 has not presently been demonstrated to be **justified**. Earlier assessment identified material concerns relating to infrastructure, services, settlement function and cumulative development. Changed circumstances justified reassessment of ASN2, but the relevant question is whether updated proportionate evidence demonstrates that those constraints have materially changed, been overcome or can now be satisfactorily mitigated.

6.4 The Parish Council considers that this has not been demonstrated with sufficient certainty. Important conclusions about the sustainability and suitability of the allocation continue to depend upon future transport planning, masterplanning, infrastructure provision, mitigation and phasing which are not yet sufficiently defined.

Effective

6.5 The Parish Council considers MM229 has not presently been demonstrated to be **effective**. HDC's evidence recognises that comprehensive masterplanning, infrastructure alignment and phased delivery are important to the successful development of ASN2, while HA5 does not sufficiently establish the timing, coordination, responsibilities and mechanisms through which those requirements will be secured across separate development parcels.

Consistent with national policy

6.6 These concerns also engage the requirement for the Plan to be **consistent with national policy**. The September 2023 NPPF requires transport issues to be addressed from the earliest stages of plan-making, significant development to be capable of being made sustainable, infrastructure expectations to be identified, and environmental matters including flood risk and ecological networks to be properly addressed.

6.7 The Parish Council's concern is not that HA5 conflicts with every individual policy requirement, but that it does not yet provide sufficient strategic certainty that those outcomes will be secured in delivering ASN2.

7. Changes sought

7.1 The Parish Council therefore maintains its original requested modification:

Delete ASN2 from Strategic Policy HA5 and make the corresponding alteration to the Policies Map.

7.2 If the Inspector concludes that ASN2 should remain, the Parish Council requests, without prejudice to its primary objection, that HA5 be strengthened to require:

a. approval of a comprehensive site-wide masterplan before substantive permission is granted for individual development parcels;

- b. an allocation-wide transport and movement strategy;
- c. coordinated landscape, biodiversity, heritage and drainage frameworks;
- d. an infrastructure delivery and phasing schedule covering education, healthcare, community, recreational, transport, water and wastewater provision;
- e. clear funding responsibilities and development or occupation triggers;
- f. evidence that commencement and build-out assumptions reflect infrastructure and phasing dependencies; and
- g. proportionate participation by all development parcels so that individual development does not prejudice infrastructure, mitigation or comprehensive delivery of the allocation.

7.3 These safeguards would address some of the Parish Council's concerns regarding effectiveness. They would not alter its primary submission that the evidence has not presently demonstrated that ASN2 at the proposed scale is a justified allocation.

Documents referred to

1. National Planning Policy Framework, September 2023, particularly paragraphs 16, 31, 34, 35, 104, 105, 110, 126–130, 159–161, 174 and 179.
2. Inspector's announcement dated 16 September 2026 concerning the applicable version of the NPPF.
3. Inspector's Guidance Note for the October Hearings.
4. Inspector's Hearing Agenda – Matter 6g.
5. MM229 – Proposed Main Modification to Strategic Policy HA5.
6. HDC Site Assessment Report and subsequent Site Assessment Update – Ashington Northern Cluster.
7. Relevant HDC Transport Assessment and Scenario Testing documents.
8. HDC Infrastructure Delivery Plan.
9. Made Ashington Neighbourhood Plan 2019–2031.
10. Planning applications within ASN2, referred to solely insofar as relevant to comprehensive planning and delivery.