

# **Horsham Local Plan Sustainability Appraisal (SA)**

## **SA Report Addendum Non-technical Summary (Draft)**

June 2026

## Quality information

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# 1. Introduction

- 1.1.1. This is the Non-technical Summary (NTS) of the Sustainability Appraisal (SA) Report Addendum published as part of the SA process for the emerging Horsham Local Plan.
- 1.1.2. The Horsham Local Plan aims to establish a strategy for growth and change across the District up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. The SA Report Addendum is published alongside proposed Main Modifications (Main Mods) to the Horsham Local Plan as previously submitted in July 2024. The aim is to present an appraisal of the proposed Main Mods alongside ‘reasonable alternatives’ order to inform representations and subsequent plan finalisation.
- 1.1.4. The SA Report Addendum is presented in three Parts:
- Part 1 – discusses past work including appraisal of **reasonable alternatives**.
  - Part 2 – presents an appraisal of the current **Main Mods**.
  - Part 3 – discusses **next steps**.
- 1.1.5. The structure of the SA Report Addendum is reflected in the structure of this NTS.

## 1.2. Background

- 1.2.1. The Inspector overseeing the Horsham Local Plan Examination in Public (EiP) wrote to the Council on 5<sup>th</sup> May 2026 setting out, amongst other things:

*“The submitted plan falls short of meeting local housing need and does not contain any allowance for unmet need from neighbouring authorities. The Council will therefore need to identify further housing sites for inclusion in the plan in the interests of soundness. A number of sites had previously been identified but were not carried forward into the plan owing to the water neutrality restriction. The Council will critically reassess known sites using an appropriate methodology... and will identify a range of sites of different sizes, some of which will be capable of delivering in the shorter term to help ramp up delivery, whilst others will deliver longer term. I am mindful of the importance the Council, Andrew Griffith MP and others have placed on the importance of delivering timely infrastructure to serve the new sites.”*

- 1.2.2. It follows that a key focus of the Main Mods is the allocation of additional sites in order to significantly boost housing land supply to 2040 and, in turn, enable a significant boost to the housing requirement, which is the number of homes that the Council commits to delivering (in the knowledge that under-delivery leads to punitive measures).<sup>1</sup> In turn, the allocation of additional sites must be a key focus of reasonable alternatives.

# 2. Reasonable alternatives

## 2.1. Introduction

- 2.1.1. The legal requirement is to define reasonable alternatives (RAs) accounting for “the objectives and geographical scope of the plan” and there is also a requirement to ensure that the appraisal allows for meaningful conclusions on differential ‘significant effects’. In short, this means a focus on RAs that go to the very heart of the plan, and it can also be noted that the legal requirement to appraise and consult upon on “the plan and reasonable alternatives” suggests a need to essentially consider alternative plans. This all suggests a need to focus on alternative key diagrams, or **‘growth scenarios’**.

<sup>1</sup> NPPF para 11 sets out that the presumption in favour of sustainable development (or ‘tilted balance’) applies where a Council cannot demonstrate ‘five year housing land supply’ (5YHLS) of deliverable sites as measured against the housing requirement.

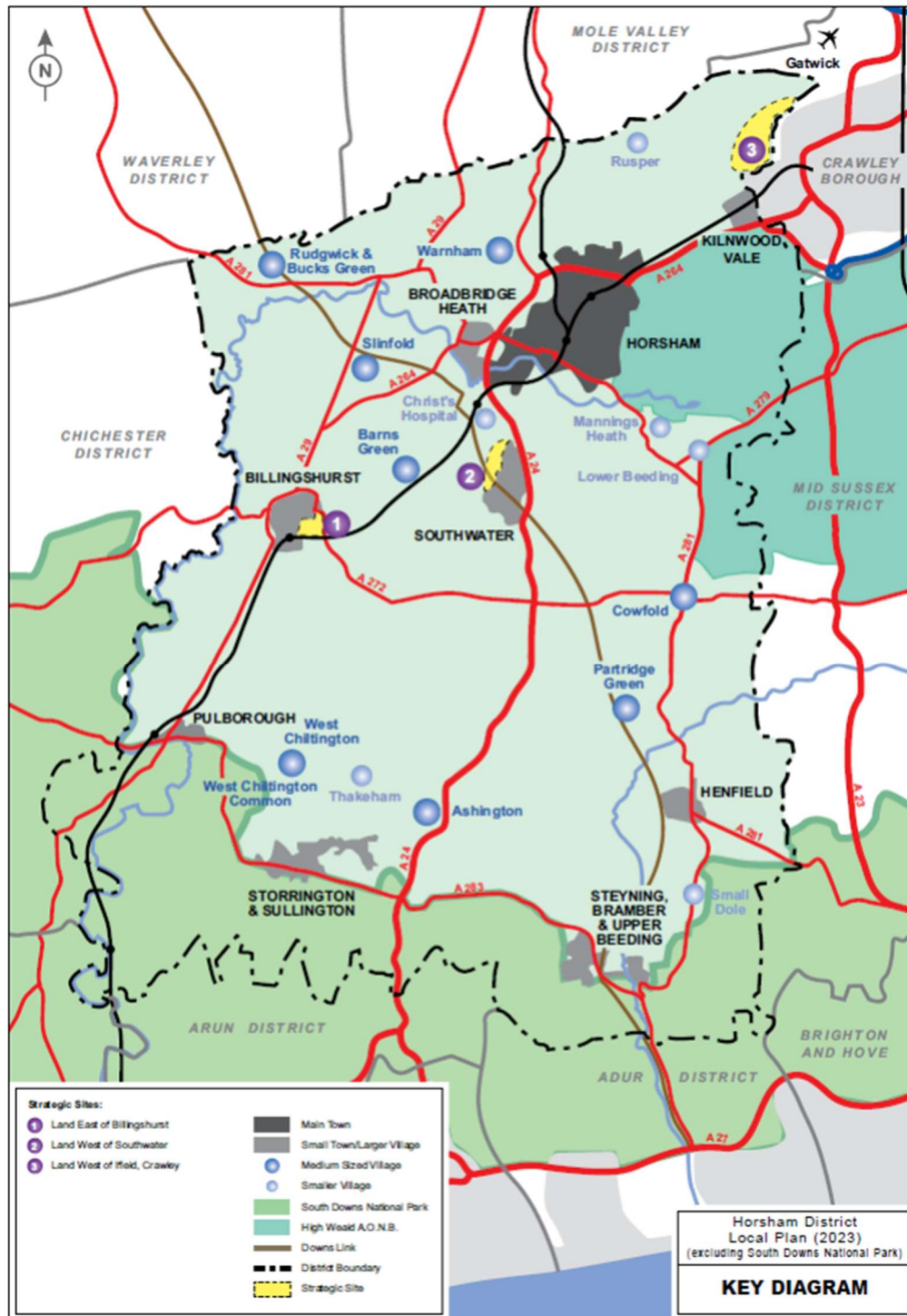
## 2.2. Defining growth scenarios

- 2.2.1. A key point to note is that the focus is on defining growth scenarios specifically defined as alternative approaches to boosting supply / the housing requirement via new allocations', i.e. such that the existing allocations within the Submission Local Plan can reasonably be assumed as a constant across all RA growth scenarios. That is not to say that existing allocations are a fait accompli, but the Inspector has given a clear direction that a focus of the current Main Mods consultation is on new allocations.
- 2.2.2. In turn, the first step is to establish the 'baseline' of supply from: A) sites that have been completed since the start of the plan period in 2023 ('completions'); B) sites either with planning permission or an allocation in a 'made' neighbourhood plan as of 1<sup>st</sup> April 2026 ('commitments'); C) a windfall assumption; and D) the submission allocations that do not have planning permission (a number had been permitted by 1<sup>st</sup> April 2026).
- 2.2.3. Specifically, the baseline supply totals **16,751 homes**, which breaks down as:
- Completions and commitments – 10,578 homes
  - Windfall – 1,440 homes
  - Submission allocations as modified – 4,733 homes<sup>2</sup>
- N.B.** these figures are correct as of the time of writing but are subject to change, as detailed technical work regarding delivery is ongoing and acknowledging that figures are subject to change in light of the ongoing examination in public.
- 2.2.4. Having established the baseline supply, the next step is to consider broadly how many homes may need to be provided for through new allocations (Main Mods) in order to enable a sufficient 'boost' to the housing requirement (see discussion above).
- 2.2.5. With regards to the housing requirement, *broad strategic* considerations are as follows:
- Local Housing Need (LHN) is 14,071 homes in total over the 17 year plan period, as understood from the Government's standard method. Whilst the Submission Local Plan proposed a requirement set below LHN, at this stage it is clear that any growth scenario involving a housing requirement set below LHN is 'unreasonable'.
  - At this stage it is clear that the housing requirement must be set above LHN such that there is provision for half of Crawley's unmet housing need, namely 3,757 homes.
  - Also, there is a strong case for additionally contributing proportionately to the unmet need from the constrained south coast local authorities, which has been estimated at 2,000 homes *per annum*, although this includes authorities relatively poorly linked to Horsham District (i.e. better linked to neighbouring authorities). The emerging proposed approach is to additionally boost the housing requirement in order to make provision for 884 homes unmet need from the south coast (52 homes per annum); however, there is a need to remain open to a higher figure.
- 2.2.6. On the basis of these bullet points the emerging proposed approach is to set the housing requirement at **18,712 homes** (14,071 + 3,757 + 884). However, it is acknowledged that there are arguments for higher growth, most notably in respect of unmet need from the south coast, such that there is a need to remain open to possible higher growth scenarios, subject to consideration of spatial strategy and supply options.
- 2.2.7. In turn there is a need for *at least* 18,712 – 16,751 = **1,961 homes** supply from new allocations in order to enable the housing requirement to be set at 18,712 homes.

<sup>2</sup> It should be noted that some adjustments are proposed to be made to submission allocations, most notably in respect of Land East of Billingshurst. Specifically, the site is allocated for 650 homes in the Submission Local Plan, but the proposal now (Main Mods) is to extend the allocation to the south such that the total allocation delivers 1,000 homes of which 890 to be delivered in the plan period. This proposal warrants scrutiny but for the purposes of defining RA growth scenarios it is reasonable to assume the extended Land East of Billingshurst site (north and south of railway) as a 'constant' across all scenarios. To be clear, the figure of 4,733 homes from submission allocations reflects the latest proposed position, including 890 homes from East of Billingshurst. Whilst a 'constant' across the RA growth scenarios, proposed adjustments to submission allocations are a focus 'proposed modifications' appraisal that is presented subsequent to the appraisal of growth scenarios.

2.2.8. Next there is a need to discuss **broad spatial strategy** considerations that must factor-in as part of work to consider new supply options, and context is provided by the Key Diagram from the Submission Local Plan, which is presented below as Figure 2.1.

**Figure 2.1: The Submission Local Plan Key Diagram**



2.2.9. Key points to note include:

- The settlement hierarchy – when considering new supply there is a clear case for directing growth broadly in line with the settlement hierarchy, e.g. with a good proportion of growth directed to Horsham and the eight small towns / larger villages. However, there is also scope to depart from the settlement hierarchy, on the basis of planning/sustainability objectives and, in this regard, and immediate point to note is that three of the small towns / larger villages are constrained on account of being located adjacent to the South Downs National Park (also, for two of them, major flood zones associated with the River Adur (Pulborough) and River Arun (Steyning)).

- Strategic growth locations – the Submission Local Plan allocates three strategic sites, which are shown on the Key Diagram, and there is strong support for allocating at least one new strategic site at the current time, i.e. as part of the overall package of sites to deliver a supply boost / enable a boost to the housing requirement. As part of this, a key aim is to direct growth to locations well placed to deliver new and upgraded infrastructure alongside new homes (see the Inspector’s quote above, at para 1.2.1).
- Smaller sites – there is a need to ensure that a good proportion of the new supply comes from smaller sites, particularly in light of the Inspector’s quote specifically stating the need for *“a range of sites of different sizes, some of which will be capable of delivering in the shorter term to help ramp up delivery.”* Further considerations are: A) a diverse mix of geographically dispersed smaller greenfield sites also helps to ensure a robust housing supply trajectory, i.e. one whereby there is minimal risk of the Council failing to deliver on its committed housing requirement due to unforeseen delivery issues; B) smaller greenfield sites can tend to benefit from stronger development viability, such that they are well placed to deliver affordable housing alongside delivering on wider policy requirements (including in respect of infrastructure); and C) the NPPF states support for smaller sites including because they are suited to delivery by SME housebuilders and can allow *“opportunities for villages to grow and thrive”*.
- Broad distribution – the submission Key Diagram shows strategic allocations concentrated in the north of the District at higher order settlements (including Crawley). It is also important to note that the committed North Horsham strategic urban extension is shown as included within the settlement boundary for Horsham. It remains the case that there is a strategic case for limiting growth in the south of the District (or, more specifically, the south of the plan area, recognising that the far south of the District falls within the South Downs National Park, such that it falls outside of the plan area), because this is a more rural area with limited transport connectivity. However, the latest situation is that there is also a case for boosting the proportion of the total Local Plan supply within the south of the District at locations that are relatively well linked to the south coast towns, given a need to provide for a proportion of south coast unmet need. The Inspector’s letter of May 2026 stated: *“... the plan’s housing requirement will accommodate a realistic and reasonable evidence-based allowance for the south coast’s unmet housing need. The Council are liaising with Mid Sussex who are developing a methodology for assessing what an appropriate allowance might be. This work will enable a final figure for the housing requirement to be produced.”*

- 2.2.10. Having discussed ‘top down’ strategic factors with a bearing on growth scenarios (development needs, wider objectives, broad spatial strategy), next there is a need to give ‘bottom up’ consideration to the various potential sources of new supply that are the building blocks for growth scenarios, and a starting point is **strategic site options**.
- 2.2.11. Aside from the three submission allocations (West of Ifield (Crawley); North West Southwater; and East Billingshurst) several other strategic site options were considered in detail over the course of the plan-making / SA process prior to submission but not included in the plan (‘omission sites’).<sup>3</sup> Specifically, sites were appraised within the SA Reports submitted alongside the Local Plan (examination documents SD03a/b)<sup>4</sup> and also within Part D of the submitted Site Assessment Report (document H11).
- 2.2.12. As an initial point, one of the previously considered sites now has planning permission (the Horsham Golf and Fitness site located to the north of Southwater; it is discussed further below for context), and two further sites are now not considered to reach the threshold of a ‘strategic site’ (Land West of Kilnwood Vale and the ‘Northern Cluster’ at Ashington; they are discussed further below as non-strategic site options).
- 2.2.13. The following bullet points consider the remaining strategic sites appraised within the

<sup>3</sup> Only sites previously considered prior to submission are now being considered for potential additional allocation, i.e. the Council has not undertaken a specific call for sites in order to inform the current task of allocating additional sites.

<sup>4</sup> For context, the SA Report Update that was prepared in house and that was published alongside the Local Plan in 2023 and then submitted alongside the Local Plan in 2024 (examination document SD03a) was an update to an SA Report that was prepared by LUC in 2021 (examination document SD03a). The two reports examined the same set of 12 strategic site options (see Section 4.3 of SD03a).

previous SA Reports that were ultimately not allocated within the Submission Local Plan:

- Site SA597: Adversane – is an emerging proposed allocation at the current time (Main Mods) and, in turn, naturally warrants being **progressed** to the growth scenarios.

The site is located in the south west of the District, and would relate closely to Billingshurst, delivering a new settlement of around 3,200 homes alongside uses linked to Chichester College, Brinsbury. There is a railway line here and there is an “aspiration” to deliver a new station, although this would likely be in the longer term and there is delivery uncertainty around any new station. The site has limited constraints in some regards, and a benefit is that the site promoter is in control of the land and has undertaken extensive work to establish what could be delivered. Indeed, there are a range of ambitious proposals, albeit there is an acknowledgement that proposals are subject to change. A key benefit would be the provision of a new secondary school, which would help to meet an existing shortfall in this part of the District. However, the site is challenging in transport terms, with Horsham ~18km by road and because the B2133 – a rural road feeding onto narrow minor roads – would serve as a link to the south coast. Also, there is a need to carefully consider the effects of a new settlement here in combination with urban extensions to Billingshurst.

- SA716: Buck Barn – would deliver a new settlement of around 3,300 homes to the south of Southwater adjacent to the junction of the A24 and the A272. It clearly warrants being **progressed** to the growth scenarios for testing, including recognising that it was identified as a proposed allocation in 2021 before being removed from the plan prior to publication and submission, including but not necessarily solely on account of the issue of water neutrality issue that was a major issue at the time but is no longer an issue. Proposals for the site are well-advanced by the site promoter, and the site benefits from access onto the A24, which links to the south coast towns. However, there are constraints to growth in this area, including noting a high density / network of ancient woodlands and the nearby Knepp Estate, and there is no rail connectivity. Furthermore, given that a new secondary school is also proposed as part of the submission plan strategic allocation north-west of Southwater approximately 5km to the north, the inclusion of a new secondary school as part of this development would not be well located for meeting unmet educational needs in the District.
- Site SA744 (includes SA225/SA668): West of Billingshurst – would deliver an urban extension of around 1,000 homes and on balance warrants being **progressed** to the growth scenarios. The proposal is to deliver significant enhancements to community infrastructure and greenspace, but a clear issue is that the site does not relate well to the settlement edge, in that it is separated by the A29, which is a bypass that opened in 1999, and there is also landscape sensitivity. Furthermore, the site would not deliver a secondary school, and there is a need to caution against an overly growth strategy for Billingshurst. Finally, whilst this site warrants being progressed to the growth scenarios it is considered reasonable to *rule out* a scenario involving this site’s allocation in combination with Adversane (also accounting for committed growth at Billingshurst and the East of Billingshurst submission allocation). High growth in the Billingshurst area and along the A29 would be a concern (including noting the Pulborough Conservation Area to the south) and there would be delivery risks.
- Site SA459/SA674/SA846: East of Kingsfold – would deliver a new settlement of around 2,000 homes to the north of Horsham. There is a railway line, and the proposal is to deliver a new station, but there is considerable delivery uncertainty. Also, an issue is proximity to North Horsham, which is a major strategic urban extension where the current proposal is to support additional homes, including via a series of extensions to the committed site, including aimed at supporting delivery. Further considerations are: A) there is landscape sensitivity relating to the valley of Boldings Brook; B) as a smaller new settlement there is more limited potential to deliver a mix of uses and infrastructure; C) whilst the proposal is to deliver significant employment land, noting adjacent existing employment land, road connectivity could be a challenge; and D) there is less confidence around deliverability relative to the other strategic site options.

In conclusion, this site is **ruled out** on balance, i.e. not progressed to the growth scenarios, because the three sites discussed above are sequentially preferable and

there is no strategic case for allocating this site *in addition to* two of these sites (recalling that Adversane and West of Billingshurst are mutually exclusive).

- Site SA414: North East of Henfield – the proposal here (known as ‘Mayfields New Town’) was for a large new settlement to deliver perhaps 7,000 homes alongside significant employment land, but this option is **ruled out** because the site is no longer available within the plan period. There is relative proximity to Brighton, but a key issue is the lack of railway connectivity in this area, and road connectivity is also challenging including as most trips would be to and from the south coast via the historic centre of Henfield. As such, what would be called for is a cross-border scheme in collaboration with Mid Sussex District, which achieves good road connectivity via the A23. However, progressing any such scheme would be a major undertaking, such that allocating a new settlement here is not a realistic option for the current Local Plan (noting the context of impending local government reorganisation and devolution which will significantly change geographies for local plan-making). Finally, there is a need to note the context of other options for additional allocation at Henfield, discussed below.
- Site SA394: Rookwood– is **ruled out** as it is no longer available given that corporately the Council, as landowner, has resolved to keep its use as a golf course for the foreseeable future. Whilst it was presented as an option at the Reg 18 stage in 2021, it had been ruled out as unavailable by 2023. The site is located on the edge of Horsham, and benefits from being well-contained by the A24, but there are onsite and adjacent constraints relating to Boldings Brook, a large Local Wildlife Site / Local Nature Reserve, numerous ancient trees and woodland priority habitat. As Council-owned land that relates well to Horsham it warrants ongoing consideration; however, it is a challenging site for strategic growth and not an option for the current Local Plan.

- 2.2.14. In summary, in addition to Adversane, which is an emerging proposed allocation at the current time, there is also a need to explore two other strategic site options across the reasonable growth scenarios, namely Buck Barn and West of Billingshurst.
- 2.2.15. The next matter for consideration is then **non-strategic sites** that should feature within the reasonable growth scenarios, and a starting point is the list of non-strategic sites that are emerging proposed ‘new’ allocations at the current time (Main Mods).
- 2.2.16. In total there are 16 such sites and the following bullet points provide an overview, with settlements discussed in descending order of growth quantum proposed:
- Henfield – two adjacent sites to the east of the village are proposed for 450 homes and 191 homes respectively, although the latter site was recently granted planning permission at appeal ([DC/24/1932](#)). There is one submission allocation for 50 homes (there is currently a planning application; [DC/23/0189](#)), and there are also four existing neighbourhood plan allocations, including: A) a site to the east for 25 homes and a significant area of open space / sports pitches that is now proposed to be extended to deliver the new proposed 450 home allocation; and B) a site to the north that recently received a resolution to grant planning permission for 235 homes ([DC/21/2013](#)).
  - Ashington – a cluster of sites to the north west of the village is proposed to deliver 450 homes, having previously been appraised as a strategic site option within the submission SA Reports (‘the Ashington cluster’). Adjacent to the south is a PDL site under construction for 74 homes and a submission allocation for 75 homes (where there is a pending planning application for 74 homes; [DC/25/1327](#)), and then further to the south is site for 152 homes with a resolution to grant permission ([DC/23/0406](#)).
  - Kilnwood Vale – is a new community at the edge of Crawley, and the proposal now is to deliver an additional 350 homes. This was previously appraised as a strategic site option, and a clear benefit is good links to Crawley, the strategic road network and a rail station. Constraint relating to the adjacent High Weald National Landscape is limited; however, a potential concern is ongoing westward sprawl, and there is also a need to consider proximity to the West of Ifield submission allocation for 3,000 homes.

- Horsham – a site for 120 homes is proposed to the east of Horsham that falls within the National Landscape (NL), and where there is a pending planning application ([DC/26/0671](#)). Whilst the submission plan does not propose any allocations in the NL, this site is considered to have relatively limited landscape sensitivity and to be relatively well-contained such that there are limited concerns regarding future development creep (it previously formed part of a planning application for 473 homes across a wider site). Also, North Horsham will deliver a business park nearby.
- Cowfold – the proposal is to allocate a site for 100 homes to the east of the village (there was previously an application for 110 homes; [DC/18/2745](#)), which is in addition to two submission allocations for a total of 70 homes to the north west of the village (one of which now has planning permission for 35 homes; [DC/24/0982](#)), plus there is a permitted site to the north of the village for 35 homes ([DC/22/1815](#)). Cowfold is a rural village but reasonably well linked by road, and the new proposed allocation relates reasonably well to the village and the A272, and is quite well contained.
- Southwater – the proposal is to allocate one site for 100 homes to the south of the settlement, which would somewhat round-off the settlement edge given a recently constructed site for 193 homes to the east and a site with planning permission for 93 homes (up to 100% affordable housing) to the west ([DC/21/2180](#)), although there is a need to consider impacts to an adjacent stream / ancient woodland corridor. There is also the context of a permitted site for 100 homes to the west ([DC/20/0695](#)) and there is a pending planning application for 82 homes to the south ([DC/25/0102](#)). As well as growth to the south of Southwater, the context is: A) recent and ongoing growth to the west, following an allocation in the 2015 Local Plan; B) the Horsham Golf and Fitness site to the north, which was previously appraised as a strategic site option but is now permitted for 800 homes; and C) the submission strategic allocation for 1,000 homes to the north west (there is now a planning application; [DC/26/0366](#)).
- Billingshurst – as well as the proposal to extend the East of Billingshurst strategic allocation to the south which has been discussed above,<sup>5</sup> the proposal is to allocate one site for 100 homes which is located adjacent to the north of East of Billingshurst. Land adjacent to the north of the site has planning permission for 83 homes ([DC/20/2607](#)) such that the site would round off or even infill the settlement edge assuming East of Billingshurst comes forward. The site benefits from access onto the A272 and appears to be subject to limited constraint; however, again it is important to reiterate a need to consider the in-combination effects of growth locations at (and around) Billingshurst in terms of infrastructure capacity, including secondary schools.
- Storrington and Sullington – the proposal is to allocate two new sites for a total of 80 homes, and the context is two submission allocations for a total of 125 homes (half of the site to the west (STO1) now has permission for 62 homes; [DC/24/2006](#)). There are also a number of other sites around the edge of the village recently constructed, under construction, permitted or with pending planning applications, including a site to the south that falls within the South Downs National Park (SDNP) and has permission for 78 homes. The larger of the two proposed allocations (50 homes) would somewhat round-off the settlement edge, and it can be noted that this site was presented as a potential allocation at the Regulation 18 stage (2020); however, there are landscape sensitivities, including noting the River Stor at the southern edge of the site. There was previously a refused planning application for 160 homes ([DC/17/1430](#)). The smaller site (30 homes) is located to the south of the village and adjacent to the SDNP. The site has been the subject of two past applications that went to appeal and were refused, and there is now a pending application at appeal ([DC/24/1196](#)).

<sup>5</sup> The proposal is to expand East of Billingshurst to the south to include Site SA757 (Land off Coneyhurst Road). This is a 23 ha site separated from the existing East of Billingshurst site by the railway, but the proposal is to deliver a new footbridge over the railway to replace the current level crossing. The site is well contained and benefits from a single land owner, but there are constraints in the form of adjacent ancient woodland, a stream corridor running through the centre of the site and a network of mature hedgerows, plus direct road access into Billingshurst is via an existing housing estate.

- Partridge Green – there are three submission allocations for a total of 255 homes (two of which now have planning permission) and the proposal is to extend one of these to deliver an additional 80 homes, such that there would be a significant concentration of growth across three sites to the north east of the village. The proposed site would expand the north east growth area eastwards as far as a bridleway / former lane that should then form a defensible boundary. For context, there is also a pending planning application for 101 homes to the south west of the village ([DC/25/1922](#)).
- Lower Beeding – is a fourth tier settlement, but there is a primary school, and the village has reasonable links by road to Horsham and Crawley. The proposal is to allocate two sites for a total of 28 homes, which are adjacent sites located to the south west of the village, and which somewhat represent infill (there is a pending application for 24 homes on one of the sites; [DC/26/0640](#)). There are two submission allocations to the north of the village for a total of 37 homes (one is now permitted for 30 homes; [DC/24/1763](#)) and there is also a nearby site under construction for 22 homes.
- Rudgwick and Bucks Green – the proposal is to allocate a site for 15 homes that benefits from being very well contained but there is biodiversity sensitivity given an adjacent ancient woodland / stream corridor and also noting a surface water flood channel passing through the centre of the site. There is also heritage constraint noting a series of adjacent listed buildings. For context, there are two adjacent submission allocations where the proposal is now to support 96 homes in line with recent planning permissions (the larger site has a resolution to grant permission for 90 homes; [DC/25/1269](#)) in contrast to the proposal at submission for a total of 66 homes.
- Barns Green – the proposal is to allocate a site for 10 homes that relates well to the village built form and is well contained by a mature hedgerow. Also, it can be noted that there was previously a refused application for 63 homes ([DC/15/0029](#)). For context, there are two adjacent submission allocations for a total of 75 homes, and one of these is now the subject of an application for 68 homes ([DC/25/2057](#)).
- Small Dole – is a fourth tier settlement without a primary school, but the village is located in the south of the District and there is direct access onto an A-road. The proposal is to allocate one site for 10 homes, which is located adjacent to a recently constructed site for five homes, and where there is currently a pending application for 9 homes ([DC/26/0638](#)). The site includes an element of PDL and relates very well to the built form of the village, and there is a strong case for ensuring a scheme that delivers 10 homes such that there is a requirement to deliver affordable housing. The Submission Local Plan allocates one site for 40 homes, where there is now a pending application for 45 homes ([DC/25/1019](#)), and it can also be noted that to the north of the current proposed allocation for 10 homes is an area of land that has recently been the subject of several planning applications (currently there is a pending application for 9 homes; [DC/25/0849](#)). Finally, it can be noted that Small Dole is in proximity to key viewpoints along the scarp slope of the South Downs, most notably Edburton Hill.

2.2.17. Having discussed the 16 sites that are new proposed non-strategic allocations (Main Mods), the question is whether any warrant being progressed to the RA growth scenarios as a 'variable' or, alternatively, whether all can be progressed as a 'constant'.

2.2.18. On balance, the conclusion is that all can reasonably be progressed as a **constant**, in light of the discussion presented above, but also more broadly because there is considered to be limited case for questioning the officer-led site selection process in respect of non-strategic sites. Summary considerations to support this conclusion are:

- Henfield – there is a degree of concern in respect of a somewhat piecemeal high growth strategy, but there is a strategic case for growth as Henfield is a second tier settlement in the south of the District not located adjacent to the SDNP.
- Ashington – is a third tier settlement but benefits from being well linked to the south coast via the A24, and there is a logic to the proposed large new allocation.
- Kilnwood Vale – this is overall considered to be a strongly performing option but there is a need to guard against the risk of ongoing westwards sprawl along the A264.

- Horsham – the proposed site is within the High Weald NL but there is nonetheless considered to be a clear case for allocation. It is also grade 1 agricultural land.
  - Cowfold – whilst there is limited strategic case for additional growth the new proposed allocation is considered to perform well in site-specific terms.
  - Southwater – is a second tier settlement well linked to Horsham, located on A24 and with a nearby rail station, but there is a need to guard against problematic high growth. The proposed allocation is somewhat constrained, but mitigation can be envisaged.
  - Billingshurst – the proposed allocation is considered to be a strongly performing site, but there is a need to carefully consider overall growth strategy for Billingshurst.
  - Storrington and Sullington – there is a strategic case for growth as this is a second tier settlement located in the south of the District, but there are constraints to growth. The two proposed allocations are somewhat constrained, but mitigation can be envisaged.
  - Partridge Green – there is limited strategic case for growth, but the proposed allocation appears to be a fairly logical extension to a submission allocation (now permitted).
  - Lower Beeding – is a fourth tier settlement but there is a primary school, and the two proposed allocations are modest in scale and appear to give rise to limited concerns.
  - Rudgwick and Bucks Green – the proposed allocation is modest in scale and well contained / relates well to the village, although there are some significant constraints.
  - Barns Green – the proposed allocation appears to give rise to limited concerns. The village is in proximity to higher order settlements albeit connected by minor roads.
  - Small Dole – is a fourth tier settlement without a primary school, and there is a need to consider growth strategy, but the village benefits from links to the south coast towns.
- 2.2.19. Having discussed strategic site options and the emerging proposed non-strategic allocations, the final site options to consider are those non-strategic sites that are *not* proposed for allocation at the current time ('omission sites').
- 2.2.20. Numerous such sites are assessed in Part D of the Site Assessment Report (the report is being updated at the time of writing), and whilst it is difficult to pinpoint specific sites for testing, there is a clear strategic case for testing the possibility of higher growth from non-strategic sites as a **variable** across the RA growth scenarios.
- 2.2.21. There is a need for a proportionate approach to identifying a package of sites for testing, and the approach taken in the main report is to discuss each settlement in turn, giving consideration to commitments and submission allocations alongside new proposed allocations before reaching a conclusion on whether there is a reasonable scenario involving allocation of one or more non-strategic omission sites.
- 2.2.22. The conclusion reached that it is appropriate to test a package of 6 sites to deliver a total of 400 homes. Specifically, the non-strategic omission sites for testing are as follows (N.B. it is important to reiterate that these are *indicative* sites for SA purposes):
- SA565 (Land at Hilland Farm, Billingshurst (100 homes) – well contained by permitted sites to the north and south and woodland to the east. This is a complex site and broad area, as the west of the site has planning permission for employment land, whilst to the north is: A) a permitted employment site where there is now a pending application to 're-masterplan' to deliver a mixed use scheme ([DC/25/1697](#)); and B) a site recently granted at appeal for 125 homes ([DC/24/0749](#))
  - SA894 (Land West of London Road, Henfield; 30 homes) – on the one hand there is limited strategic case for higher growth at Henfield given the risk of problematic high growth. However, on the other hand, there is a strategic case for considering higher growth given road links to the south coast towns. The site in question could somewhat round-off the settlement edge given a permitted site to the west and the new proposed allocation for 450 homes to the east (as discussed above); however there is a need to account for a significant surface water flood channel (the site capacity reflects this).

- SA088 (Land north of Forest Road, Horsham; 20 homes) – this site is located in the NL, and there was previously a refused application for 20 homes, but it relates reasonably well to the settlement edge and is quite well contained. In strategic terms, it is considered appropriate to test at least one non-strategic omission site at Horsham.
- SA129 (Land at Christ's Hospital, west of Southwater; 150 homes) – Chris's Hospital is a fourth tier settlement without a primary school but the site in question is adjacent to a rail station with a good service (half hourly in both directions). The site is promoted as being able to deliver an expanded station car park, but the latest situation is that this is set to be delivered in any case by the North West Southwater submission allocation.
- SA486 (Land adjacent to Clay Lane, Storrington and Sullington; 50 homes) – there is a strategic case for testing higher growth at Storrington and Sullington given proximity to the south coast towns, but there are constraints to growth at the village. The site in question forms part of the final area of land to the south west of the village that falls outside of the SDNP, and previously there was a proposal for comprehensive growth within this parcel of land. However, the situation now is that eastern part of the wider parcel (which relates best to the village edge) is a new proposed allocation for 30 homes, and the southern part of the wider parcel no longer available. In turn, the assumption is a 50 home scheme to the south of Chapel Lane and east of Clay Lane, but the SDNP is adjacent and access appears to be challenging. Also, there is a need to consider that traffic from the site would pass through the constrained village centre.
- SA499 (Land to the rear of Fairlands, Storrington and Sullington; 50 homes) – there is an adjacent submission allocation and there has been recent growth nearby, such that there is a concern regarding ongoing sub-optimal development creep, but the site benefits from proximity to a primary school and there are relatively limited SDNP concerns. Also, there is some potential to access the A24 via Rock Road, thereby avoiding the village centre, but from Rock Road there is only a left turn onto the A24.

2.2.23. Having now discussed all categories of supply, Table 2.1 presents a summary.

**Table 2.1: Summary of constants and variables (N.B. figures subject to change)**

Supply component	Constant or variable	Comments
Completions & commitments	Constant	10,578 homes
Windfall	Constant	1,440 homes
Submission allocations (as adjusted by proposed Main Mods)	Constant	4,733 homes
New strategic allocations	Variable	Three sites hence several potential combinations.
New non-strategic allocations	Variable	Two scenarios: 1) the emerging proposed allocations; and 2) additional allocation of the indicative package of six omission sites.

2.2.24. The final task is to combine constants and variables to form reasonable alternative (RA) growth scenarios for appraisal and consultation.

2.2.25. A starting point is the emerging proposed approach, which involves allocation of Adversane new settlement (1,500 homes in the plan period) plus 16 non-strategic allocations for a total of ~2,064 homes. In combination with supply from completions, commitments, windfall and submission allocations the total local plan supply would be 20,135 homes, i.e. a figure 43% higher than LHN, such that the housing requirement could be set well above LHN so as to make provision for half of Crawley's unmet need and a modest proportion of the unmet need arising from the south coast (the proposed approach is to set the requirement at 18,712 homes). This is **Scenario 1**.

- 2.2.26. Next is a scenario as per Scenario 1 but with Adversane replaced by Buck Barn, which would also deliver around 1,500 homes in the plan period. This is **Scenario 2**.
- 2.2.27. Next there are two scenarios involving additional allocation of the indicative package of 6 non-strategic omission sites, namely:
- **Scenario 3** = Scenario 1 plus the indicative package of non-strategic omission sites
  - **Scenario 4** = Scenario 2 plus the indicative package of non-strategic omission sites
- 2.2.28. Next there is a need to consider West of Billingshurst and, on balance, it is considered reasonable to only test the possibility of allocating West of Billingshurst so as to deliver higher growth, i.e. it is reasonable to assume it would only be allocated *in addition* to another new strategic allocation. Furthermore, and as discussed, it is reasonable to rule out the possibility of allocating West of Billingshurst in addition to Adversane. As such, **Scenario 5** involves Scenario 2 plus additional allocation of West of Billingshurst.
- 2.2.29. Finally, **Scenario 6** see high growth via allocation of both Adversane and Buck Barn.
- 2.2.30. These six RA growth scenarios are set out in Table 2.2. Final points to note are:
- The precise figures in Table 2.2 are subject to change prior to publication.
  - The scenarios differ to those that have been subject to transport modelling because scenarios for transport modelling were (necessarily) defined early in the process.
  - Whilst there are other site combinations there is no requirement to appraise and consult on every feasible site combination and there is a clear need to minimise the number of scenarios with a view to an accessible and even engaging appraisal.
  - Work to define growth scenarios was out of necessity undertaken in May / June 2026 in parallel with wider site selection and evidence gathering workstreams including work by officers to update the Site Assessment Report. This is a methodological limitation.
  - Defining growth scenarios must be a proportionate exercise and ultimately it is considered that the requirement to present “*an outline of the reasons for selecting the reasonable alternatives*” [SEA Regulations; emphasis added] has been met.

**Table 2.2: The RA growth scenarios (constants greyed-out)**

Scenario	1 Adversane	2 Buck Barn	3 Adversane Non-strat.	4 Buck Barn Non-strat.	5 Buck Barn W. B'hurst	6 Adversane Buck Barn
Completions & commitments	10,578	10,578	10,578	10,578	10,578	10,578
Windfall	1,440	1,440	1,440	1,440	1,440	1,440
Submission allocations	4,733	4,733	4,733	4,733	4,733	4,733
Adversane	<b>1,500</b>	0	<b>1,500</b>			<b>1,500</b>
Buck Barn	0	<b>1,500</b>		<b>1,500</b>	<b>1,500</b>	<b>1,500</b>
West of Billingshurst	0	0	0		<b>1,000</b>	
New non-strategic sites	2,064	2,064	<b>2,464</b>	<b>2,464</b>	2,064	2,064
<b>Total homes</b>	<b>20,315</b>	<b>20,315</b>	<b>20,715</b>	<b>20,715</b>	<b>21,315</b>	<b>21,815</b>
<b>% above LHN (14,071)</b>	<b>44%</b>	<b>44%</b>	<b>47%</b>	<b>47%</b>	<b>51%</b>	<b>55%</b>

## 2.3. Growth scenarios appraisal

2.3.1. Set out below is an appraisal of the six growth scenarios under the 'SA framework', which primarily comprises a list of 17 sustainability topics. The appraisal is summarised in a 'matrix' with a column for each of the SA topics and a row for each of the scenarios, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence, and "?" used where there is uncertainty at this stage); and then **2)** categorise performance in terms of 'significant effects' on a red/amber/green scale.<sup>6</sup>


**Table 2.3: Growth scenarios summary appraisal**

	Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
Housing	5	4	3	2	2	★1
Access to services and facilities	★1	2	3	3	4	2
Inclusive communities	=	=	=	=	=	=
Crime	=	=	=	=	=	=
Health & wellbeing	2	★1	2	★1	2	★1
Biodiversity	=	=	=	=	=	=
Landscape	★1	★1	2	2	2	★1
Historic environment	★1	★1	2	2	2	★1
Soil quality	2	2	3	3	★1	★1
Natural resources	=	=	=	=	=	=
Water resources	?	?	?	?	?	?
Flooding	=	=	=	=	=	=
Transport	2	★1	2	2	3	4
Air pollution	★1	★1	2	2	★1	★1
Climate change	=	=	=	=	=	=
Economic growth	5	4	3	2	3	★1
Employment	=	=	=	=	=	=

<sup>6</sup> Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

- 2.3.2. The appraisal serves to highlight Scenario 1 (the emerging proposed approach), Scenario 2 (which sees Adversane replaced with Buck Barn) and Scenario 6 (the emerging proposed approach plus Buck Barn, i.e. high growth) as potentially performing well overall, having accounted for both the order of preference under the various topic headings and predicted effects. However, it is important to be clear that the appraisal does not *necessarily* lead to a conclusion that any of these three scenarios perform best overall, because: A) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and there is little reason to suggest equal weight); and B) the topic specific appraisal conclusions are open for debate (indeed an aim is to spark debate).
- 2.3.3. For example, the Council (or any interested party) might choose to give weight to 'housing' and, having done so, reach a conclusion that there is overall a preference for Scenario 3 or Scenario 4 (which involve allocation of indicative non-strategic omission sites), perhaps alongside a view that the appraisal overplays the disbenefits of these scenarios and underplays the disbenefits of Scenario 6. Furthermore, boosting supply from small sites could assist with a robust housing land supply such that there is greater confidence in being able to maintain a five year housing land supply (5YHLS) over the coming years and, in turn, a reduced risk of the Council facing the presumption in favour of sustainable development, with positive implications for many objectives.
- 2.3.4. Having made these overarching remarks, set out below is an explanation of the conclusion reached under each of the sustainability topic headings. With regards to appraisal methodology, further points to note are as follows:
- Variables – each of the appraisal narratives begins with a discussion of the factors that allow for differentiation between the scenarios, i.e. a discussion of the 'variables'.
  - Constants – having discussed the variables, each narrative then considers the 16 new proposed allocations that are held constant across the scenarios, i.e. such that they do not have a bearing on conclusions reached in terms of the differential performance of the scenarios but do have a bearing on predicted 'significant effects'.
  - Significant effects – each appraisal narrative ends with a discussion of significant effects, but it should be noted that concluding on significant effects is challenging and highly subjective. Each discussion begins by recording the conclusion reached on significant effects in respect of the local plan as a whole at the point of submission, but two points to note are: 1) this conclusion accounted for development management (DM) policies (area-wide and site-specific), whilst the current appraisal of growth scenarios aims to keep assumptions regarding DM policies to a minimum; and 2) at the current time there is a need to consider the significant effects of both the local plan as a whole and also proposed/potential main modifications (as it is only main modifications that are open for consultation at the current time). See further discussion of significant effects below under each of the specific topic headings.
  - Limitations – the appraisal below is in draft and will need to be updated to ensure it reflects the latest evidence and understanding. In particular, it should be noted that the appraisal below draws on the Site Assessment Report (SAR) as it stood at the point of submission, whilst the final appraisal for consultation will need to reflect work to update the SAR that is ongoing at the time of writing. Another source of evidence that has not yet factored-in is the Infrastructure Delivery Plan. Transport modelling results did, however, become available just in time to inform the appraisal below.

## Housing

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
5	4	3	2	2	1 

- 2.3.5. Whilst there is little or no case for providing for more than 50% of Crawley's unmet housing need (given the potential for Mid Sussex to also make a significant contribution), there is a clear strategic case for higher growth so as to provide for a higher proportion of the very extensive unmet need arising from the south coast towns.
- 2.3.6. Whilst there is no clear evidential basis for apportioning unmet need from the south coast towns across the local authorities to north, there is reason to suggest that Horsham and Mid Sussex are better placed than other authorities – see Box 2.1 (which considers unmet need across Sussex as a whole in order to provide context, although it should be noted that Horsham does not link at all well to coastal East Sussex). Also, there is likely unmet need from Surrey, but this is a less pressing issue for Horsham.
- 2.3.7. As well as total growth quantum, the order of preference reflects a view a view that:
- There is a case for Buck Barn over Adversane because Buck Barn relates better to the south coast towns via the A24. This was point was clearly acknowledged in the Site Assessment Report (SAR) at the time of submission.<sup>7</sup>
  - There is limited 'housing' case for higher growth at Billingshurst (Scenario 5). Also, whilst the West of Billingshurst site promoter suggests early delivery (initially with the northern part of the site coming forward for around 300 homes), the SAR at the time of submission concluded the need for further work to resolve issues such that: *"It is therefore not considered that significant levels of development would not come forward until much later in the plan period once these issues have been resolved."* Also, the SAR explained that market capacity could affect timing of delivery."
  - All three of the variable strategic sites could deliver Gypsy and Traveller pitches, which is a very important consideration given high need and limited supply options. The Submission Local Plan explains that *"the identified Gypsy and Traveller needs for the first 10 years of the Plan and for Travelling Showpeople, can be met through the regularisation or intensification of existing sites, and through the allocation of new sites"*; however, there is also a need to consider further need to 2040, plus an update to the Gypsy and Traveller Accommodation Needs Assessment (GTAA, 2025) identified slightly increased need over the first ten years (2 pitches). A further consideration is possible unmet need, but it is not clear this is a significant factor.
  - There is a clear case for boosting supply in the earlier years of the plan period via additional smaller allocations (Scenarios 3 & 4), with a view to a less stepped housing requirement and/or increased supply headroom over the requirement (as a contingency for delivery issues / to ensure that the requirement is delivered and the council can maintain a 5YHLS. Also, the indicatively shortlisted non-strategic omission sites are mostly sites likely to benefit from strong development viability such that they would be well-placed to deliver the full policy quota of affordable housing. Not all of these sites are being actively promoted though, e.g. north of Storrington.

<sup>7</sup> In respect of Buck Barn the SAR stated: *"Locationally the site is situated centrally within the District on A24 and A272. The A24 is the only dual carriageway in the District and provides road links to Horsham, Crawley and the south coast... It is considered that the central location of the site... may provide good opportunity for homes to be delivered that meet the needs of the District as well as being directly connected to the road to the South coast by the A24."* In respect of Adversane, the SAR stated: *"... this site is geographically less well connected to the settlements of Horsham, Crawley and the south coast and the site therefore performs less well in terms of how it can meet District and wider sub regional requirements."*

- 2.3.8. With regards to the 16 new proposed allocations that are a 'constant' across the growth scenarios, overall there is merit to the proposed approach in 'housing' terms because there would be a particular boost to supply in the south of the District, most notably to Henfield and Ashington but also to Storrington, Cowfold, Partridge Green and Small Dole. There is also one new proposed allocation at the eastern edge of Horsham that is well-linked to Crawley, and this site is within the High Weald National Landscape.
- 2.3.9. With regards to significant effects, at submission the conclusion was that the plan would give rise to a minor positive effect. However, at this stage it is clearly appropriate to predict a significant positive effect across all of the growth scenarios.

**Box 2.1: Local plan-making across Sussex and unmet need risk**

- Adur – the adopted plan generates significant unmet need, and the review is at an early stage, with no evidence published to date of relevance to unmet need risk.
- Arun – a consultation document in 2024 raised the distinct possibility of generating unmet need: *“This annualised local housing need figure is just **a starting point** and is not a housing target. A housing target will not be known and identified... until key evidence has been collected on Arun’s ability to accommodate housing and other development, supported by infrastructure that is deliverable and viable... and without adversely affecting the built and natural environment or being vulnerable to climate change impacts (e.g. flood risk).”*
- Brighton – the adopted plan ends in 2030 and provides for 660 dpa in the context of housing need at the time of 1,506 dpa and now understood to be ~2,500 dpa. The Inspector’s Report explained: *“Formal requests were sent to other Councils... No positive responses were forthcoming, mainly because other authorities are finding it difficult to meet their own needs.”* An ‘Issues’ consultation document (2024) discussed potential supply for 670 dpa.
- Chichester – the submitted plan generated unmet need, but modifications were then made as part of the Examination in Public such that the adopted housing requirement is set at LHN. Issues though are: A) a short plan period; B) plan period supply below the requirement (it will be boosted through a follow-on plan); and C) supply being dependent on A27 mitigation.
- Crawley – the Inspector’s Report explains: *“Whilst it will be for each authority to ultimately determine precisely how much housing development it can sustainably accommodate within the suitable land available, the cautiousness of [neighbouring] authorities to assist addressing the unmet housing need does not represent a failure... on Crawley’s part.”*
- Eastbourne – a recent draft plan proposed a requirement set at ~42% LHN.
- Hastings – a recent draft plan proposed a requirement set at ~27% LHN.
- Lewes – a recent draft plan identifies 8,568 homes supply with LHN being 15,002 homes.
- Mid Sussex – is now committed to providing for significant unmet need. However, previously the submitted local plan was criticised by the Inspector at the time for a lack of constructive engagement in respect of unmet need, with the context being that whilst there have been sub-regional groups tasked with considering unmet need these have been ineffective.
- Rother – a recent draft plan identifies 8,427 homes supply with LHN being 15,504 homes.
- South Downs National Park – a complicating factor here is that the Proposed Submission Local plan states that LHN is 323 dpa whilst an ‘apportionment study’ that considers how to apportion standard method LHN suggests an LHN figure of 1,048 dpa.
- Wealden – a recent draft plan proposes between 8,000 and 10,000 homes unmet need, depending on whether there is support for a challenging strategic site at Uckfield. The Council points to landscape, biodiversity, flood risk and transport constraints as reasons for generating unmet need, and acknowledges that the proposal to generate unmet need is in the context of very significant unmet need being generated or proposed by neighbouring south coast authorities, namely Brighton, Eastbourne, Hastings, Lewes and Rother.
- Worthing – the Inspector’s Report for the adopted local plan explains: *“Concerns were raised that a failure to agree a solution to housing need in Worthing, and the remainder of the West Sussex area, is a sign of collective failure of the Duty... However, while a solution to the... problem has not been reached, the Council has still sought to address the issue...”*

## Access to services and facilities

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
1	2	3	3	4	2

- 2.3.10. School capacity is a key issue for consideration here, with there being a need to direct growth to locations where there is existing capacity (indeed some village schools can be under capacity such that they are at risk of closure, given declining birth rates) or where new capacity can be delivered alongside new homes (either a new school or expansion of an existing school where this is a possibility).
- 2.3.11. In light of these introductory points, the order of preference reflects a view a view that:
- Whilst both new settlements would deliver a secondary school, there is a strong preference for Adversane because there is a significant need for new secondary school capacity in this part of the District, whilst there is no clear case for a new school at Buck Barn because a new school is set to be delivered by North West Southwater. Furthermore, Adversane is linked with Brinsbury College which provides post-16 education, together with vocational links with the existing businesses. There is an opportunity for this to be expanded, and the college has expressed this aspiration.
  - There is a significant concern with higher growth at Billingshurst in the absence of a new settlement at Adversane (Scenario 5), given the secondary school capacity issues affecting the town, plus the site could set a precedent for further piecemeal expansion to the west of Billingshurst with opportunities missed to plan comprehensively so as to deliver a new secondary school.<sup>8</sup>
  - There are some schools capacity concerns in respect of the indicatively shortlisted non-strategic omission sites (Scenarios 3 and 4), most notably at Christ's Hospital, which would see ~150 homes despite the village not benefitting from a primary school.
- 2.3.12. With regards to the 16 new proposed allocations that are a 'constant' across the growth scenarios, there are no firm proposals to directly deliver new primary school capacity, but the submission SAR stated this as a possibility at the Ashington Northern Cluster. Specifically, it stated that land would be made available for a school (and other non-housing uses) alongside 450 homes. However, the latest situation is that there is land safeguarded in the neighbourhood plan to expand the existing school site to the south.
- 2.3.13. Henfield is then another key settlement for consideration, where two adjacent new proposed allocations (one now permitted) would deliver 641 homes (and the permitted site was originally submitted as a much larger site, such that there is a risk of future piecemeal expansion) without delivering a new primary school. However, there are not known to be capacity issues at the existing village school, or at least issues that cannot be addressed via expansion. For context, it is also noted that the promoters of the northern site (proposed for 450 homes) previously proposed an 800 home scheme to include land for a primary school.
- 2.3.14. Final considerations are: A) Small Dole does not benefit from a primary school (but the proposed site is small); and B) several sites would increase pressure on the Weald School and Sixth Form at Billingshurst.
- 2.3.15. With regards to significant effects, at submission the conclusion was that the plan would give rise to mixed effects, but it is now appropriate to predict a 'moderate or uncertain' positive effect for those scenarios that would deliver new secondary school capacity.

<sup>8</sup> It can be noted that understanding at the current time is that the West of Billingshurst landowner is unwilling to work in collaboration with adjacent landowners to the west of Billingshurst in order to deliver a larger more comprehensive scheme.

- 2.3.16. This conclusion factors-in some concerns with the 16 constant proposed allocations, including in respect of secondary school capacity at Billingshurst under those scenarios involving Adversane, recognising that a new secondary school would take time to deliver. At the time of submission the matter of secondary school capacity at Billingshurst was a significant factor that led to sites being rejected that are now proposed for allocation, with the submission SAR stating the following for all omission sites at Bilingshurst (N.B. the assumption at the time was that there would not be a new secondary delivered at Adversane): “... given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impact of additional smaller scale development, the Council considers it would be inappropriate to allocate further sites for development in the settlement. As such, it is not proposed that the site be allocated.”

### Inclusive communities

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.17. It is difficult to meaningfully and confidently differentiate between the growth scenarios in respect of sustainability objectives relating to inclusive communities. At the point of submission the SA Report concluded that the plan as a whole would give rise to a significant positive effect partly because the proposal at the time was *not* to allocate a contentious new settlement; however, at this stage it is very difficult to suggest particular concerns with either of the new settlement options, recognising that in the absence of a new settlement there would be major pressure for expansion of existing settlements (and, indeed, the plan would likely struggle to progress to adoption, such that settlement expansions would be likely to continue to come forward at ‘speculative’ sites under the presumption in favour of sustainable development). Furthermore, there is a need to acknowledge that higher growth in Horsham District would relieve pressure to deliver sub-optimal schemes in neighbouring areas within the sub-region.

- 2.3.18. Further considerations are:

- The promoters of both new settlement options have undertaken a considerable amount of work to develop scheme proposals, such that there is confidence in the ability to viably deliver high quality new communities. See further discussion below.
- West of Billingshurst would deliver benefits to the town in terms of upgrades to sports and leisure facilities and a new country park, and separation of the site from the wider settlement by the A29 dual carriage way could mean that the scheme is seen as somewhat separate from Billingshurst, although the corollary is that the new community would risk being poorly integrated with Billingshurst.
- The *variable* non-strategic sites mostly give rise to limited concerns in terms of impacts to existing communities, with the primary consideration likely in respect of developing Christ’s Hospital as a ‘sustainable’ settlement. *Additional* growth at Henfield is somewhat a cause for concern but the site is small and well-contained.
- Across the package of 16 *constant* non-strategic sites it is important to recognise that numerous were rejected at the submission stage due partly due to concerns around impacting village “fabric”, including accounting for the cumulative impact of growth across sites. The clearest concern is in respect of growth at Henfield, with the submission SAR stating several times that: “*Henfield cannot be expected to take an unlimited quantum of development.*” Also, at Partridge Green the SAR stated that the new proposed allocation would need to be delivered “part of a comprehensive proposal with SA433” but the latter site now has permission.

- 2.3.19. Overall, it is not possible to meaningfully and confidently differentiate between the growth scenarios. With regards to significant effects, whilst the Submission Local Plan is thought to generate relatively limited concerns amongst local communities, there is a need to flag a risk with the new proposed strategy under all scenarios ahead of consultation and subsequent work to consider and potentially action responses.

### Crime

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.20. It is difficult to meaningfully comment on the merits of the growth scenarios in respect of sustainability objectives relating to crime. The SA Report at submission concluded a minor positive effect for the plan as a whole, but it is not clear to what extent this was a factor of spatial strategy / sites, as opposed to DM policies. At this point objectives relating to crime are not considered to be a significant factor with a bearing on the appraisal, although views to the contrary are welcomed. One factor could be the importance of providing for unmet housing needs arising from urban areas in the subregion where overcrowding is an issue and one that may correlate with crime rates.

### Health & wellbeing

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
2	1	2	1	2	1

- 2.3.21. The first point to note is that all three of the strategic site options have the potential to deliver a healthcare facility, although this might only be a small-scale or outreach facility in the case of West of Billingshurst, and in all three cases there is inherent uncertainty regarding delivery as it would be contingent on future decision-making by the NHS Integrated Care Board. Further points regarding the three strategic sites are as follows:

- Adversane – the submission SAR concluded “a clear commitment to promotion of healthy lifestyles and provision of local healthcare” and identified the potential for a “compact” new settlement supportive of walking and cycling. However, relative to Buck Barn the scheme vision performed less well in terms of integrating green / blue infrastructure, open space and community facilities aimed at a “cohesive community”.
- Buck Barn – whilst the submission SAR scored Buck Barn on a par with Adversane under the ‘Health’ heading, it scored Buck Barn much more favourably under ‘Leisure / Recreation / Community Facilities’. It described a “strong and clear vision” including:
 

“The site promoters state one of their core principles is to create a sense of place by introducing and enhancing the ability to use the green space around them. It has set out specific provisions of outdoor and indoor recreational facilities and spaces. These are four areas of allotments; a country park for informal recreation and nature exploration; a central village green/cricket pitch/football pitch; further football pitches in the northern part of the site; multicourts (MUGAs) for outdoor sports; four playgrounds, and two skate park/ball court/bike track areas. A village hall, further neighbourhood hall and indoor sports hall are proposed. Around 50% of the site area is proposed as green infrastructure including a linear park following the river and a country park area alongside the Downs Link strategic cycle route.

*... The emerging masterplan also proposes a pedestrian/cycle 'river corridor', woodland walk paths, and enhancement of existing public rights of way, including improved connections from the site to the Downs Link strategic leisure route.*

*... A community hub is also proposed to be provided in partnership with the Plunkett Foundation, to accommodate a community shop, community café, and... community workspaces. Other hub features have been indicated as light-touch laboratory space, gym, private nursery, healthcare provision/pharmacy, pub/hotel and library."*

It might also be suggested that this distinct offer could compliment the different but also distinctive offer at recently permitted Horsham Golf and Fitness site to the north.

- West of Billingshurst – the submission SAR concluded a neutral effect under 'Health' (compared to a favourable effect for Adversane and Buck Barn) and a favourable effect under 'Leisure / Recreation / Community Facilities' (compared to a neutral effect for Adversane and a very favourable effect for Buck Barn) but an unfavourable effect under 'Development quality' (compared to favourable for Adversane and very favourable for Buck Barn). Explanation provided within the SAR included:

*"The Northern parcel is relatively separate from the southern parcels and from the existing settlement. The homes could therefore lack any cohesive community core."*

*"The site would provide a new country park between the western and northern parts of the main part of the site (SA744) north of the A272, including 40 allotments and a community orchard. A new leisure centre including a gym, indoor tennis court, padel court and a new 3G playing field on the parcel at Hilland Roundabout (SA688) would be provided to extend the offer at Jubilee Fields. It is noted that this has support within the existing community. A community hub is proposed in the Country Park. These facilities would provide benefits for the new and existing communities in Billingshurst. However, the scale of development is such that there would be continued reliance on existing community networks and the existing village centre facilities in Billingshurst and given the development form and relationship with the existing village, there may be limited ability for the development to achieve a cohesive community with a clear sense of place."*

*"Although geographically close to Billingshurst, the A29 presents a significant physical barrier in terms of accessing wider community facilities by active travel (i.e. walking, wheeling and cycling), with poor permeability with the existing settlement resulting (only a single bridge crossing for non-motorised users would provide a direct link from the larger southern residential parcels to the rest of the village). Limited work has been undertaken and provided as to how existing bus services could access the new development, however there is low certainty as to whether this would be achieved. A potential mobility hub and car clubs are suggested but no detail is provided as to how this could operate successfully. Access to the railway station, particularly by active travel modes, is sub-optimal and would also need to be significantly enhanced."*

- 2.3.22. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), it is difficult to suggest significant health issues / opportunities, but one point of note is in respect of possible growth to the north east of Billingshurst. Specifically, growth here would complete expansion of the settlement as far as a series of woodlands such that, in turn, there might be a green infrastructure opportunity to explore (there appears to be limited accessibility across the wooded landscape to the north east of Billingshurst).
- 2.3.23. With regards to the 16 new new proposed allocations that are held constant across the growth scenarios, points to note include:
- Henfield is proposed for notably high growth and has an existing medical centre.
  - Ashington – is proposed high growth and does not have a medical facility. However, the proposed scheme, if delivered comprehensively, has the potential to deliver a multi-functional community space that could potentially incorporate a small medical facility, plus the scheme has the potential to deliver wider community and sports facilities allotments and multifunctional green /open space.

- Cowfold, Partridge Green and Rudgwick – are third tier settlements that benefit from a GP surgery, but the submission SAR stated limited or no capacity at Cowfold.
- Small Dole and Lower Beeding – are both fourth tier settlements without a GP surgery.

2.3.24. With regards to significant effects, at submission the conclusion was that the plan would give rise to a minor positive effect, and this informs a view that all of the growth scenarios would have a 'moderate or uncertain' positive effect. The strategic sites all represent a degree of opportunity (particularly Buck Barn) and there are limited concerns regarding new non-strategic allocations under any of the scenarios.

## Biodiversity

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

2.3.25. It is difficult to differentiate between the three strategic site options, with all three rated 'unfavourable' by the SAR at the time of submission. However, it can also be noted that the submitted SA Reports conclude a preference for Buck Barn.

2.3.26. Perhaps a primary consideration is that Adversane and West of Billingshurst are located in the west of the District, which is broadly an area of constraint, particularly relating to the Mens SAC, around which there is a 12km Bat Sustainance Zone, but also noting the Upper River Arun SSSI. However, whilst Buck Barn is distant from internationally and nationally designated sites, this is nonetheless a broadly sensitive area associated with a high density of woodlands, including ancient woodlands, and a network of river and stream corridors associated with the upper reaches of the River Adur.

2.3.27. The following bullet points further consider analysis from the submission SAR:

- Adversane – whilst relatively close to the Mens SAC, functional links with the SAC are potentially limited (subject to ongoing Habitats Regulations Assessment, HRA). There is limited onsite and adjacent constraint, and the constraints that exist (woodlands and stream corridors) are towards the edge of the site suggesting good potential for avoidance/mitigation (and drawing upon these features for containment).
- Buck Barn – the submission SAR stated:

*“The site has a number of ecological sensitivities. There is an area of ancient woodland on the western edge of the site (alongside the A24), and most of the ‘Downs Link, Nutham Wood & Greatsteeds Farm Meadow’ Local Wildlife Site falls within the site boundaries... The site is also close to the Knepp Estate, albeit separated by the A24. This land is an area that has been part of a rewilding project... now recognised as an important location for biodiversity and nature conservation. It also supports rare Barbastelle and Bechstein bat species.*

*Overall, it is considered that there are significant issues with regards biodiversity... However, this is balanced against the degree of willingness by the promoter to fully understand these sensitivities and promotion of a scheme that actively seeks to protect and enhance these assets. In particular, it is important that the integrity of ancient woodlands is protected, bearing in mind recreational pressures and the potential for fragmentation... Subject to further development of the masterplan, it is considered that there is reasonable to good prospect of the impacts being mitigated.”*

- West of Billingshurst – as well as relative proximity to the Mens SAC the Upper Arun SSSI is located in very close proximity to the site. The SAR concluded: *“The site promoter’s evidence highlights that these could be adversely impacted [and] biodiversity enhancements could be provided [but] there is very limited information to evidence that impacts could be satisfactorily mitigated.”*

- 2.3.28. Overall, at this stage it is not possible to differentiate between the merits of the sites, but it is acknowledged that weight might be given to the opportunity to deliver significant onsite green and blue infrastructure enhancements at Buck Barn.
- 2.3.29. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), most of these sites are subject to a degree of biodiversity constraint, in particular:
- Chirst's Hospital – the site here is adjacent to an important ecological corridor associated with a stream and an ancient woodland that is a Local Wildlife Site (LWS).
  - Billingshurst – as discussed there would be a need to consider the integrity of adjacent and nearby woodlands, although the two closest woodlands are not ancient woodland (one is shown on [historic mapping](#) whilst the other is not).
  - Storrington – development of the site to the west would mean that the settlement envelops a wooded stream corridor (although not shown to be associated with any priority habitat) and Parham Park SSSI is approximately 400m to the west of the site.
- 2.3.30. With regards to the 16 new proposed allocations that are held constant across the growth scenarios, as an initial point it should be noted that several of the settlements in question fall within the Mens SAC Bat Sustainance Zone (Ashington, Billingshurst, Rudgwick, Southwater and Storrington). Sites with wider constraint then include:
- Southwater – there is a need to carefully consider further growth to the south of the settlement given a significant ancient woodland that follows a stream corridor, and given the very high ancient woodland coverage across the wider landscape in this part of the District. Also, it is important to note that the site was previously promoted as part of a wider site that would extend further south, and there is a pending planning application on that part of the site to the south that is now not proposed for allocation.
  - Rudgwick – is a linear settlement associated with raised land between two stream corridors, both of which are associated with ancient woodland. The proposed extension abuts ancient woodland and there is also a wooded surface water channel running through the centre of site – linking to the adjacent ancient woodland / stream corridor – that is associated with a historic field boundary (see [historic mapping](#)).
  - Barns Green – the site is closely associated with an ancient woodland running along a stream corridor, plus there is a historic field / property boundary along the southern edge of the site associated with trees covered by a Tree Preservation Order (TPO). However, this has informed the site capacity (10 homes).
  - Billingshurst – attention focuses on the proposed southern extension to the East of Billingshurst strategic allocation (not counted as one of the 16 proposed new allocations). Specifically, development of this parcel of land would extend the settlement edge as far as a large ancient woodland, and increase the risk of the woodland being somewhat enveloped in the future (noting a site with planning permission to the south of the woodland). Furthermore, a stream corridor runs through the centre of the site, there is a network of historic field boundaries and there is a need to recall the relative proximity of Billingshurst to the Mens SAC.
- 2.3.31. In conclusion, it is not possible to confidently differentiate between the growth scenarios, but at this stage it is considered appropriate to predict a 'moderate or uncertain' negative effect for all scenarios ahead of consultation with key partner and stakeholder organisations (at the time of submission the conclusion was that the plan would give rise to mixed effects). Whilst there is a case for preferring lower growth scenarios / flagging a concern with higher growth, there is also a need to recall that higher growth in Horsham would help to relieve pressure elsewhere within a constrained sub-region.

## Landscape

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
★ 1	★ 1	2	2	2	★ 1

- 2.3.32. Beginning with the three strategic sites, an immediate point to note is that the submission SAR concluded 'very unfavourable' for West of Billingshurst, particularly because: *"The presence of the Country Park, and the proposed sports pitches mean that the built form of the development would take place on two separate land parcels... This would result in a dispersed and non-cohesive settlement form. In addition, the proposed masterplan shows the southern parcel of land would primarily deliver housing away from the A29 thus further from the existing settlement. This will therefore give rise to a development which lacks any clear relationship with [Billingshurst]."*
- 2.3.33. It is also considered appropriate to flag a concern regarding future development creep to the south, i.e. a risk that West of Billingshurst in turn leads to sub-optimal piecemeal western expansion of Billingshurst. Taking a step back, from a landscape perspective a comprehensive approach to growth west of Billingshurst might involve expansion bounded: to the north by Eaton Copse and its associated stream corridor (also noting a distinct hill to the south of the copse), which is the southern extent of a distinctly wooded landscape to the north of Billingshurst; to the west by Lordings Road and associated heritage assets (with the River Arun beyond); and to the south by Brockhurst Brook, which is a significant green/blue corridor linking to the River Arun and the northern extent of a distinctly wooded landscape to the south of Billingshurst (also associated with a sewage treatment works and a long distance path).
- 2.3.34. With regards to Adversane versus Buck Barn, at this stage it is considered appropriate to conclude that they perform broadly on a par in landscape terms:
- Adversane – the majority of the site has 'moderate' capacity, and whilst there is lower capacity at the northern extent of the site (in proximity to Adverane, which is an attractive historic hamlet appreciated from, albeit also influenced by, the A29), and at the southern extend of the site (in proximity to the South Downs National Park, SDNP, noting a distinct hill to the east of the River Arun, albeit seemingly not accessible), these sensitivities can likely be addressed to a good extent through masterplanning.
  - Buck Barn – some parcels have 'no/low' capacity, whilst other parcels have 'moderate' or 'high' capacity, with sensitivities mainly in the north of the site including noting an attractive lane, heritage assets, footpaths and the gap to Southwater. There is clear potential to draw upon landscape features (topography, woodland, streams, heritage assets, the Downs Link) to frame growth, and overall the potential for a well-contained new settlement can be envisaged. However, growth is proposed in the north.
- 2.3.35. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), all of these sites are subject to a notable degree of landscape constraint:
- Storrington – the parcel of land under consideration to the west of the village is adjacent to the SDNP and has 'no / low' capacity, but the current assumption is a modest scheme that could relate reasonably well to the settlement edge (but there could be pressure for future development of the remaining part of the parcel). There are clear views across the site towards the South Downs escarpment (around 2km distant), a footpath passes through the site that links the village with countryside to the west, and adjacent Clay Lane (the SDNP boundary) is a rural lane associated with heritage assets and views of the escarpment. Access might need to be achieved from Clay Lane, such that a scheme would 'face away' from the village.

The following quote from the submission SAR is also of note: *“The prominent southern edge of Storrington hold attractive views of the South Downs and the intervisibility between the urban edge of Storrington and the national park is an important characteristic in this location.”*

Moving on to the shortlisted site to the north, this is less sensitive but the submission SAR nonetheless raised a concern. A concern would also be ongoing piecemeal expansion in this area (noting recent and proposed growth), and there is also a need to consider traffic through the Heath Common area, which is an area of common land / former common land associated with a characteristic low density built form.

- SA088 (Land north of Forest Road, Horsham; 20 homes) – this site is located in the High Weald NL, and there was previously a refused application for 20 homes, but it relates reasonably well to the settlement edge and is quite well contained. Onsite mature trees might limit capacity could limit development capacity.
- SA129 (Land at Christ's Hospital, west of Southwater; 150 homes) – there is low-moderate capacity for medium scale housing and the Landscape Capacity Study states: “... the parkland landscape, historic buildings and their distinctive setting, together with its wider importance within the District results in a landscape which is highly sensitive to large-scale development”.
- SA565 (Land at Hilland Farm, Billingshurst (100 homes) – there is low-moderate capacity but given adjacent permitted sites the potential for a carefully designed scheme to perhaps ‘complete’ the expansion of Billingshurst in this direction might be envisaged, drawing upon adjacent woodlands for containment.
- SA894 (Land West of London Road, Henfield; 30 homes) – there is low-moderate capacity but the site could somewhat round-off the settlement edge given a permitted site to the west and the new proposed allocation for 450 homes to the east. The site would be framed by stream corridors to both the west and the east.

2.3.36. With regards to the 16 new new proposed allocations that are held constant across the growth scenarios, a number were ruled out prior to submission partly on landscape grounds, with quotes from the submission SAR including:

- Henfield – *“A large extension proposed here would have a very significant adverse impact on the settlement character and form. The majority of the site falls within Local Landscape Character Assessment 2021 which identifies no/low capacity for change to accommodate large-scale development such as that proposed.”*
- Storrington – *“Previous planning history in relation to this site has cited landscape impact resulting from development as being negative and would have a detrimental impact on local character.”*
- East of Billingshurst extension – *“Development in this location would extend the built form of development further to the southeast. The Landscape Capacity Study (2021) assesses the area to have no or very limited capacity for development.”*
- Lower Beeding – *“... visible on the approach to the village from the west... The lack of integration with the fabric of the village would also need to be addressed and mitigated... development would also alter the settlement form of the village urbanising the development pattern west through ribbon development along Sandygate Lane.”*
- Partridge Green – *“... a comprehensive scheme comprising of SA637 and SA433 would be seen to extend the settlement form into the open countryside along Shermanbury Road in a somewhat detached extension of the settlement.”*

2.3.37. Also, at Small Dole there is considerable SDNP setting sensitivity but the proposed new allocation gives rise to limited concerns, including because: *“The site is well related to the existing settlement form and the horticultural buildings link the site to the existing built form - there is residential development on two sides.”*

- 2.3.38. Finally, with regards to Land West of Kilnwood Vale (350 homes), the conclusion at submission was that landscape impacts are limited notwithstanding the adjacent National Landscape, but there is a wider concern regarding the westward sprawl of Crawley towards Faygate (where there is a rail station) with Horsham beyond.
- 2.3.39. In conclusion, whilst there are inherent concerns with higher growth with a District associated with widespread constraint, there is also a need to acknowledge sensitivities across the wider sub-region such that, on balance, there is support for Scenario 6 as allocation of two new settlements would relieve pressure for settlement expansion.
- 2.3.40. With regards to significant effects, the conclusion at submission was that the plan would give rise to mixed effects, but there is now a clear need to flag a concern ahead of consultation. There is a case for predicting a significant negative effect for the worst performing scenarios, including recognising landscape sensitivities affecting numerous settlement expansion options (including a clear sensitivity relating to the setting of the SDNP), but on balance a 'moderate or uncertain' negative effect is predicted.

### Historic environment

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
★ 1	★ 1	2	2	2	★ 1

- 2.3.41. The submission SAR concluded 'unfavourable' for all three of the strategic sites in terms of 'Archaeology / Cultural Heritage', and the SA Report at the time of submission similarly predicted negative effects for all three sites. Taking the sites in turn:
- Adversane – there are limited sensitivities other than in respect of the Adversane Conservation Area at the north west extent of the site, which is associated with an historic crossroads (now the A29 and the B2133). There is good potential to buffer the conservation area, and it is understood that there would be no need for junction upgrades within the conservation area, but increased traffic is a clear issue, including recognising the incombination effect with growth at Billingshurst.
  - Buck Barn – the north of the site is sensitive given a series of listed buildings, most notably Tuckman's Farm, which is likely appreciated from an adjacent footpath. The other farm onsite is not listed but is shown on [historic mapping](#), and the historic mapping also shows a footpath through the site as a lane. The network of woodlands and field boundaries is largely unchanged from that shown on historic mapping, and a further consideration is the possibility of future development creep to the south of the A272, where there is a major cluster of assets at Park Farm.
  - West of Billingshurst – the key issue is avoiding impacts to Lordings Road to the west, which is a rural lane associated with a series of listed buildings. There is a public house here that is linked to Billingshurst by a footpath that passes through the site.
- 2.3.42. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), four of these sites are subject to limited constraint, but in respect of the other two:
- Storrington – there is a series of listed buildings in the vicinity of the site to the west, which – in combination with clear views of the South Downs escarpment, Clay Lane as a historic land and green/blue infrastructure including a footpath and a stream – likely serve to demarcate the edge of the village and the transition to the South Downs, including noting Grade II\* Parham Registered Park and Garden to the west.
- Also, there is a need to consider traffic through the historic village centre (which is also a consideration for the other shortlisted omission site to the north of the village).

- Chirst's Hospital – the submission SAR explained: *“There are no listed buildings on site, or within the immediate vicinity of the site. The site is however close to Christ's Hospital School and the wider setting of these buildings would need to be considered... It is not considered that there is potential on site for a substantial new housing scheme... given the potential impacts on... 8 [trees with a TPO]. In addition, there is a public right of way... traversing the site from east to west.”*

2.3.43. With regards to the 16 new proposed allocations that are held constant across the growth scenarios, several are subject to a degree of constraint, perhaps most notably:

- Rudgwick – the site is located behind eight residential properties of which five are Grade II listed. There are also numerous listed buildings to the north, and overall there is a clear case for maintaining the historic 'frontage' built form in this area.
- Cowfold – whilst there are no onsite or adjacent/nearby listed buildings, the site lies within the setting of the Cowfold Conservation Area (which includes a Grade I church).
- Henfield – the proposed expansion area to the east of the village is distant from listed assets, but a clear concern is traffic through the historic village centre, where there is a high density of listed buildings. The following is also a notable quote from the submission SAR: *“... the scale of development proposed would have a negative impact on the... character of the village. Further clarification also is sought on access arrangements and providing an adequate, safe vehicular access via the existing housing development located to the west of the site rather than Furners Lane which is single width and contributes towards the setting of the Henfield Conservation Area.”*

2.3.44. In conclusion, the situation is very similar to that discussed under 'Landscape'. When considering the merits of directing growth to two new settlements associated with relatively limited historic constraint there is also a need to recognise that the Council has committed to immediately preparing a new Local Plan that will need to make provision for a significantly higher local housing need (LHN) figure.

### Soil quality

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
2	2	3	3	★1	★1

2.3.45. All three of the strategic site options comprise land shown by the recently published nationally available agricultural land classification (ALC) dataset to be grade 2b quality land, i.e. land that is not 'best and most versatile' (BMV), where BMV land is grade 1, grade 2 or grade 3a. Detailed survey data is available only for part of West of Billinghamurst, which finds the land surveyed to be grade 2b quality.

2.3.46. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), most do not comprise BMV land according to the new ALC dataset, but the two sites at Storrington are both shown to comprise grade 2 quality land and are in agricultural use.

2.3.47. With regards to the 16 new proposed allocations that are held constant across the growth scenarios, two of the sites are shown to comprise grade 1 quality land by the new ALC dataset, namely sites to the east of Horsham (the previous dataset had suggested grade 4) and to the north of Storrington. Also, the site to the east of Henfield that recently gained permission at appeal is shown to be grade 2 quality (whilst the larger site adjacent to the north is shown as grade 3b quality). The large new proposed site at Ashington is notably shown to comprise grade 4 quality land.

2.3.48. In conclusion, again (as per the discussion above under 'landscape' and 'historic environment') there is support for a strategy involving focusing growth at strategic sites subject to limited constraint in the local and sub-regional context.

- 2.3.49. With regards to significant effects, whilst at submission the conclusion was that the plan would give rise to mixed effects, it is now considered appropriate to predict a ‘moderate or uncertain’ effect for all but the best performing scenarios, including recognising that there would be loss of BMV quality land that is arguably ‘significant’, including some loss of grade 1 quality land. In light of the new ALC dataset it is difficult to conclude that Horsham District is a lower constraint District in the sub-regional context.

### Natural resources

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.50. It is difficult to suggest significant issues for consideration under this heading that are not better considered under other headings (notably issues relating to soils resources, as discussed above, and water resources, as discussed below). Much of the District is covered by a Minerals Safeguarding Area (MSA) for brick clay, but it is difficult to conclude that this is a significant constraint given the extent of the MSA.
- 2.3.51. With regards to significant effects, at submission the conclusion was that the plan would give rise to mixed effects and, at the current time, a neutral effect is predicted.

### Water resources

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
?	?	?	?	?	?


- 2.3.52. The need for water neutrality was a key issue at submission, with a view to avoiding impacting water levels and in turn impacts to the water environment and associated sites of international and national importance for biodiversity. There is no longer a need for water neutrality given an agreed solution in respect of supplying water to the area; however, ahead of consultation with the environment agency and the water company it is still reasonable to flag the risk of the local plan boosting supply leading to a ‘moderate or uncertain’ negative effect. As part of this, it is acknowledged that planning for water supply is highly challenging given the need to align with Water Resource Management Plans prepared by water companies, and that constrained water supply has risen up the agenda further since the time of submission, including with issues affecting Kent and Hampshire. Whilst site promoters have over recent years undertaken work to demonstrate the potential to achieve water neutrality, the latest situation is that in most cases these past proposals have been withdrawn (recognising that measures aimed at achieving water neutrality come at a cost). Indeed, it is notable that many developers with permitted sites have applied to remove conditions relating to water neutrality.
- 2.3.53. Finally, there are also uncertainties regarding capacity at wastewater treatment works (where capacity issues can lead to a risk of water pollution), and recognising that capacity upgrades take time and come at a cost. The submission SAR explained: “*The Gatwick Sub-Region Water Cycle Study [2020] reports that large-scale development by Billingshurst and by Crawley (most notably the sites allocated at West of Ifield and East of Billingshurst...) could have implications with regard to capacity at existing wastewater treatment works (WwTW) infrastructure.*” This issue is considered in the Council’s Infrastructure Delivery Plan, which will be factored-in ahead of publication.

## Flooding

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.54. The submission SAR favoured Adversane and flagged a concern with West of Billingshurst. However, at this stage it is considered appropriate to highlight a large area of surface water flood risk within the Adversane site, including affecting the area proposed for a primary school, whilst at West of Billingshurst it would likely be possible to masterplan the site so as to avoid development in areas affected by flood risk. At all of the sites there would be potential to design-in high quality sustainable drainage systems (SuDS) and downstream flood risk is not a clear concern at any of the sites.
- 2.3.55. With regards to the non-strategic sites that feature across the growth scenarios, most are subject to limited flood risk constraint, in that the sites could be masterplanned with flood risk in mind (green/blue infrastructure and SuDS) without hindering the achievement of wider objectives or the site becoming unviable. However, flood risk is an important consideration for four of the sites that are a 'contant' across the scenarios:
- East of Billingshurst extension – a fluvial flood zone passes through the centre of the site and there is significant downstream flood risk affecting existing properties.
  - Rudgwick – The SAR explains: *“A drain crosses the site east west through the woodland strip in the centre of the site, the layout of the scheme may need to take this into account... a Drainage Statement would be required.”*
  - Ashington – the site is strongly associated with the Lancing Brook, but it seems likely that streams / surface water flood zones intersecting and adjacent to the site could be effectively integrated as part of a green and blue infrastructure strategy.
- 2.3.56. In conclusion, whilst there is a case for supporting higher growth given that most of the sites that are a variable across the growth scenarios are subject to limited flood risk, on balance it is considered appropriate to rank the scenarios broadly on a par.
- 2.3.57. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect. However at this stage it is considered appropriate to predict a 'moderate or uncertain' negative effect ahead of consulting the Environment Agency.

## Transport





Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
2	 1	2	2	3	4

- 2.3.58. The submission SAR concluded a preference for Buck Barn and flagged a significant concern with West of Billingshurst. Quotes from the submission SAR include:
- Adversane:
    - “Whilst the promoters seek to safeguard land to allow for the creation of a railway station for the new settlement, there is no prospect of this being deliverable within the plan period, due to the need to upgrade the line to the north before additional stations can be provided.”

- “There may also be potential for new bus services and links to Billingshurst railway station, and opportunity for new bus services to significantly reduce private car trips. However, the exploration of these opportunities appears to be limited at this stage... The vision ensures that bus stops would be within 400m of all residents.”
  - “Mitigation measures with a cost estimated at £40million have been costed into the proposals... A new road would be created from a new roundabout on the A29 that would link to the B2133 in the north-eastern part of the site. This would form the central thoroughfare of the new settlement and would involve the creation of a bridge over the existing railway line. This re-routing would allow the current B2133/railway line level crossing to be shut, providing safety benefits as well as a more consistent flow of traffic. Network Rail have indicated support for this outcome and have agreed, in principle, the location of the bridge.”
  - “There remain uncertainties as to the extent that the proposed upgrades at Pulborough will provide the necessary mitigation that meets WSCC requirements.”
  - “Whilst it is clear that much detailed consideration of transport impacts has taken place, there remain concerns that the rates of trip internalisation are overly ambitious... This together with the uncertainties of road mitigation lead to a conclusion of unfavourable impacts at this stage.”
- Buck Barn:
    - “Access to the site would be obtained from the A272 and the promoters have indicated that they would provide enhancements to the A24; this could include a major upgrade to the Buck Barn crossroads to create a ‘hamburger’ roundabout or ‘through-about’, and a new junction at or near the B2135 Steyning Road to allow traffic to safely access the northbound carriageway of the A24. It is proposed to enhance and extend bus services to Southwater, Horsham, Crawley and Brighton.”
    - “The site does not have direct access to a railway station. The promoters are however proposing good quality bus services to the major employment centres of Horsham, Crawley, Worthing and Brighton, with interchange opportunities for accessing Gatwick Airport. It is suggested that road space changes, and improvements to junctions on main roads to improve bus priority, could secure the attractiveness and feasibility of such services.”
    - “There is the potential impact on Cowfold village centre...” [discussed below]
    - “Overall, the assessment... is balanced between the site promotor’s forward-thinking approach to sustainable travel on the one hand (albeit the take-up of such opportunities is uncertain), and the significant challenge of how to realistically and effectively achieve required mitigation measures at Cowfold...”
  - West of Billingshurst:
    - “In geographic terms, the land is not too distant from railway station. Existing bus stops enjoying a regular daily service (bus 100, hourly Monday-Saturday) are located in the village centre and railway station respectively, both up to a 20-25 minute walk for would-be future residents. Again, some limited information has been submitted to the Council as to how existing bus services could be enhanced to access the new development. Given the land is not located close to the existing bus 100 route, this may be difficult to achieve. A potential mobility hub and car clubs are suggested but no detail is provided as to how this could operate successfully. Access to the railway station would not appear convenient by walking or cycling and would also need to be significantly enhanced. Taking into account the presence of the A29 Billingshurst bypass and lack of direct (‘straight-line’) walking or cycling routes, the effective distance from the site to the railway station is considerable and may encourage additional car journeys to the station. The impact of this on the station car park will require further detailed investigation.”
    - “Due to the significant challenges... stemming from the presence of the A29 bypass, and limited information provided to the Council in relation to transport assessment and mitigation, a very unfavourable impact is concluded at this stage.”

- 2.3.59. A further consideration is then recent transport modelling (June 2026), which flags a concern with a scenario involving allocation of both Adversane and Buck Barn:
- “Increases in delay, [volume to capacity] ratios, and throughput are observed across both the A29/A283 and A24 corridors, as well as within Horsham town centre. The cumulative effect of both developments leads to more widespread and pronounced impacts [relative to scenarios involving allocation of just one of the two sites].”*
- 2.3.60. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), there is a ‘transport’ case to be made for several of these sites, including the site adjacent to Christ’s Hospital Station (notwithstanding the very low wider offer at village). At Storrington there is a need to consider traffic through the village centre and this is also the case at Henfield although the site in question here is modest in scale.
- 2.3.61. With regards to the 16 new proposed allocations that are held constant across the growth scenarios, there is a need to question the new proposed increased proportion of growth allocated to lower order settlements, and several of the sites are challenging:
- Henfield – there is a need to carefully consider the transport merits of the proposed high growth strategy for Henfield, albeit the village benefits from hourly bus services to Brighton, Steyning, Horsham and Burgess Hill (also stopping at smaller settlements). Amongst other things, the submission SAR explained: *“Further assessment is required to ensure the local road network including the High Street could accommodate additional growth alongside the Neighbourhood Plan allocations...”*
  - East of Billingshurst extension – the submission SAR explained: *“The village centre and its facilities are approximately 2km away. However, the site lies within walking distance of the train station and the corresponding services and facilities which lie close to it, including shops, recreation ground and secondary school. A bus service to Horsham is also within walking distance. The primary vehicular access would be taken off the A272 through the creation of a new Eastern Gateway. The site would offer cycle / pedestrian connections directly into the southern part of the village including pedestrianised green links.”* There is a need to confirm access proposals; however, it is understood that a benefit of the proposed extension (to the south of the railway) would be to deliver a new pedestrian footbridge over the railway in place of the current pedestrian level-crossing.
  - Billingshurst – *“The site has access onto the A272, but this does not have a pavement linking the site to the village centre for pedestrians. The site is within walking distance of bus services but via a road with no pavement.”* This issue could be addressed.
  - Southwater – *“access issues (i.e. whether access could be provided from the Mulberry Fields development to the immediate north) present uncertainty over whether development can be implemented or deliverable.”* This issue may be resolved.
- 2.3.62. In conclusion, there does appear to be a preference for Buck Barn over Adversane in transport terms, notwithstanding the possibility of delivering a new rail station at Adversane in the longer term, and acknowledging that this appraisal is undertaken with limited account taken of latest evidence around detailed site-specific proposals. Buck Barn is located on the A24 and in relative proximity to Horsham and Crawley, and it does appear that transport is at the heart of the scheme vision (subject to further scrutiny of what can be viability achieved and when). However, there is considerable uncertainty noting that the recent transport modelling favours Adversane.
- 2.3.63. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect. However at this stage it is considered appropriate to flag a ‘moderate or uncertain’ negative effect for Scenario 6 as a high growth scenario that would involve directing growth to two new settlements without rail connectivity. Also, there is a need to acknowledge that that future local plan-making will be undertaken in the context of LGR and devolution such that there will be good potential to consider potential new settlements options from a perspective of supporting transport objectives.

## Air pollution

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
		2	2		

2.3.64. At the time of submission a key issue was understood to be the Cowfold air quality management area (AQMA) located along the A272 to the east of Buck Barn. For example, the submission SAR explained:

*“A range of [mitigation] measures have been explored. These included looking at increasing capacity on the A24 route to ‘draw’ traffic away from the A272; restrict the southern access to the site to bus and emergency vehicle access only; ‘gating’ traffic through Cowfold to relocate traffic queues to outside the village, or prioritising traffic flow on the A272 through Cowfold through changing the road layout in the village...”*

2.3.65. However, the AQMA was recently revoked, such that there are reduced concerns from an air quality perspective. Nonetheless, traffic through Cowfold does remain a significant issue in the context of a potential new settlement at Buck Barn.

2.3.66. With regards to Adversane and West of Billingshurst there are no concerns regarding impacts to an AQMA, but there is a need to consider traffic through Pulborough.

2.3.67. Another consideration for all three strategic sites is then noise pollution from adjacent A-roads and, in the case of Adversane, an adjacent railway line. At Adversane there is a need to scrutinise the proposal for a focus of growth between the A29 and the railway line, and also the proposed locations of the two schools in terms of noise pollution.

2.3.68. With regards to the non-strategic sites that feature across the growth scenarios, the key consideration is the village centre AQMA at Storrington. Whilst noting that the draft Horsham District Air Quality Action Plan envisages the AQMA being revoked before 2030, it remains an area which suffers regular traffic congestion and air quality remains a concern. Under Scenarios 3 and 4 there could be a total of three new allocations at Storrington that would all lead to traffic through the AQMA (although one of the sites would have an alternative route the A24).

2.3.69. With regards to significant effects, at submission the conclusion was that the plan would give rise to a “minor positive effect”. At this stage a neutral effect is predicted across the growth scenarios but there are some notable issues warranting further scrutiny.

## Climate change

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

2.3.70. Focusing on per capita built environment decarbonisation (recognising that transport decarbonisation, whilst a key issue for any local plan, links very closely to the discussion of transport issues/opportunities presented under other topic headings), at both of the new settlement options there is likely to be good potential to deliver net zero carbon development (in operation) and to a high standard, which primarily means delivered in line with the energy hierarchy. Any new settlement would likely be an ‘exemplar’ that is scrutinised from a decarbonisation perspective, albeit there would be competing masterplanning, design and infrastructure priorities. In particular, in respect of Buck Barn the submission SAR explained that the site promoter indicates considerable ambition (albeit proposals are always subject to change):

*“The site promoter has set out a strong vision to achieve sustainable construction and has stated that all homes would be net zero carbon emissions over their lifetime, and would be carbon neutral in production.”*

- 2.3.71. With regards to the non-strategic sites that feature across the growth scenarios, the key point to note is that the majority are likely to be associated with strong development viability (including given limited infrastructure dependencies relative to strategic sites) such that they are well-placed to deliver net zero development (in operation) without having to compromise on wider objectives, including affordable housing-related.
- 2.3.72. In conclusion, there is a case for concluding support for higher growth given quite good potential for net zero developments, but on balance it is not possible to differentiate between the scenarios with confidence, including acknowledging the need to factor in transport decarbonisation alongside built environment decarbonisation.
- 2.3.73. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect, and a neutral effect is predicted at this stage. The Council has set a net zero target date in line with the national 2050 target, and it is difficult to conclude whether the proposed approach to growth is a positive or a negative in terms of influencing the decarbonisation trajectory required to achieve this target. Also, lower provision for unmet needs in Horsham could potentially lead to increased pressure for provision elsewhere at locations more distant from the source of the unmet need.

### Economic growth

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
5	4	3	2	3	1

- 2.3.74. Employment land needs would be provided for under all scenarios, and the two new settlement options would deliver well-located new employment opportunities (including noting Brinsbury College adjacent to Adversane, and Buck Barn's position on the A24).
- 2.3.75. The order of preference reflects: A) support for new settlements that can deliver employment land/opportunities; B) support for growth well linked to sub-regional centres and the growth-constrained south coast (i.e. such that on balance there is a preference for Buck Barn over Adversane); and C) limited case for growth at Billingshurst.
- 2.3.76. With regards to significant effects, at submission the conclusion was that the plan would give rise to a significant positive effect. However, at this stage it is appropriate to predict a 'moderate or uncertain' positive effect, including because the matter of providing for sub-regional unmet needs has risen and continues to rise up the agenda.

### Employment

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.77. It is difficult to meaningfully comment on the merits of the growth scenarios over-and-above the comments made above under 'economic growth'. Focusing on the three strategic sites (none of the non-strategic sites would deliver significant new employment land, although there may be an opportunity to explore in respect of the option of a new allocation to the north east of Billingshurst, which is a variable across the scenarios):

- Adversane – the SAR concluded: *“The promoters seek to achieve the Council’s aspiration for one job per home. Although not wholly met they have identified where space for around 2,450 jobs would be provided... This includes the development of Kingswood Works, an office/industrial area to be located adjacent to the A29 on the west of the site. This area already has an unimplemented permission for such uses (but would need to be amended in order to bring in access for the rest of the site)... Overall favourable impacts are concluded.”* However, the latest situation is that the Kingswood Works will no longer come forward as part of the Adversane masterplan with a smaller area instead identified for employment uses.
- Buck Barn – the SAR concluded: *“... there is the potential to achieve the aspiration of one job per home from both the new employment land and design of homes that takes into account increases in flexible home working and the opportunities presented by the employment and community uses on the site. Overall, it is considered that there would be favourable impacts arising from the development of this site.”*
- West of Billingshurst – *“Land at Platts roundabout, which forms the eastern entrance to the site has permission for a petrol filling station and convenience store with outline permission for 4,627sq.m of B class use employment space – this area is proposed as an employment / retail hub as part of the proposals. Some of this has commenced and a further outline application has been permitted. No new land is proposed as part of the scheme... Billingshurst has a number of existing employment sites and new employment land is being constructed on land opposite the northern parcel of this site... Overall, the impact is therefore assessed as neutral.”*

2.3.78. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect, and at this stage a neutral effect is predicted.

## 2.4. The preferred growth scenario

2.4.1. Officers provided the following text to explain why Scenario 1 is ‘justified’:

*The Council has considered carefully the options for delivering on a housing supply of at least 20,100 homes in line with the Local Plan Inspector’s letter dated 05 May 2026. It has taken account of updated evidence on infrastructure delivery, transport impacts, estimated rates of delivery and viability, and has updated its site assessment work in line with discussions held in examination hearings. It has, on balance, been concluded that a strategy which carries forward the submission plan spatial strategy, but also includes a new settlement development on land at Adversane together with additional small to medium site allocations aligning with the established settlement hierarchy, provides the best opportunity for sustainable and deliverable achievement of the required housing growth. This takes particular account of discussions with the local education authority, West Sussex County Council, which has highlighted the need for substantial expansion of secondary school education in the west part of the District. This can only be achieved through the allocation of a new strategic scale development at Adversane. Evidence has shown this to be a deliverable option whereby impacts can be mitigated, and which will bring wider placemaking and public benefits.*

### 3. Appraisal of the main modifications

An appraisal of the proposed modifications as a whole will be completed ahead of publication, essentially building upon the appraisal of growth scenario 1, including factoring-in proposed policies for specific sites. At the current time the growth scenarios appraisal is key information to inform elected member deliberation and decision-making.

### 4. Next steps

- 4.1.1. Following consultation on Main Modifications the intention is to hold further hearing sessions, overseen by the appointed Planning Inspector. Subsequently the Inspector may be in a position to report on the soundness and legal compliance of the Local Plan or, alternatively, there could be a need for a further consultation.

