

22nd September 2026

By email: programmeofficer@horsham.gov.uk

Dear Inspector,

Matter 6d – Land at Adversane (MM227)

CBRE is instructed by Wain Estates (**Respondent ID: 1192387**) in respect of their land interest at Kingsfold (Brookvale Garden Village). The site is assessed through the Council's evidence base as one of the alternative strategic sites and within the Draft Plan has the status of an omission site.

There is some overlap between Matter 5a (Spatial Strategy) and Matter 6d (Adversane) given that Adversane forms a significant spatial component of the Draft Plan.

Q6d(i) Transport and Movement

The updated Transport Assessment (**ID-HDCJ15b**) states that a 12% internalization rate has been used to inform the strategic sites. The justification for this is that 12% was accepted as the figure accepted by the Planning Inspectorate at the planning application stage of the Mowbray (North of Horsham Development).

As we have set out in previous submissions, the north of the district has a very different economic profile to the south of the district, as visually seen in the north's synergies with the heart of the Gatwick Diamond. The greater economic potential of the north of Horsham reflects past and current trends but, significantly in the context of a local plan to guide the future, future trends. This is captured in the Housing Delivery Study Update (**ID-HDCJB20**), as stated:

"It is also noted that Gatwick's £2.2 billion expansion, which would allow routine use of the northern as well as main southern runway, was approved in September 2025 and is expected to be fully operational by the early 2030s. As well as direct employment on-site, this is likely to facilitate economic development nearby, which would support higher rates of housing growth in Crawley and surrounds."

From the Main Modifications consultation we are unaware of any evidence that has been provided to inform that the proposed 11,400 sqm of employment space proposed in the allocation at Adversane will be forthcoming (in order to help achieve the necessary levels of trip internalization). Such a position is heightened by the fact that a further 17,540 sqm of supply is proposed at Land West of Southwater (SA119) and Land East of Billingshurst (SA118) both of which are located close to the site.

From our reading of the Draft Site Allocation for Adversane there is a requirement to produce "an economic and employment strategy..., to demonstrate the phased delivery of an appropriate number and diversity of jobs to ensure a balance between population and jobs growth, and promote economic growth and prosperity for local communities." In light of the concerns flagged in the evidence with respect to market absorption rates as well as queries over the trip internalization rate, this is evidence that should not come after the adoption of the plan. The outcome of such a report is a key consideration as to whether or not it is justified to allocate it for development.

There is currently a lack of evidence to support assumptions around the assumed increase in bus services in the south of the district. We note from the updated Highways Evidence (**HBCJB15b**) that both Adversane and East of Billingshurst will create significant pressure upon the Five Oaks Roundabout.

The Highways Evidence states that due to the land constraints surrounding the junction there is limited scope for widening the junction or altering the junction to a signalised arrangement.

In the absence of physical mitigation, improvements to the bus service are identified to mitigate this identified impact. We have not seen within the evidence base evidence to justify that bus operators have been engaged in the opportunity to service this route. Given that it relates to an area of the highways network that would be placed under stress, it is a key item to understand and a key informant for what an appropriate distribution of development is. This issue takes on even greater consideration and focus given the potential transport impacts (through air quality) associated with development in the south of Horsham and its proximity to the Mens SAC. The Strategic Sites Assessment (**HDCJB14b**) provides no confidence that the highways matters identified can be mitigated. As stated by the Council:

“There remain uncertainties as to the extent that the proposed upgrades at Pulborough will provide the necessary mitigation that meets WSCC requirements.”

The current response of WSCC should be explored through the Hearings.

Q6d (iii) Impacts and Mitigation

Landscape and Countryside

The presence of the South Downs National Park is a major constraint affecting the south of Horsham. The Strategic Sites Assessment (**HDCJB14b**) notes in respect of Adversane that *“The site has potential to impact on the setting of the South Downs National Park and care would need to be taken to mitigate against any harmful views into and out of the South Downs National Park.”* It is well acknowledged that development both within and affecting the setting of a National Park is one of the hardest policy tests to overcome in planning. The NPPF (2023) is clear that *“The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”* There is no clear distinguishment in the Strategic Sites Report as to how this elevated level of constraint has informed the Council’s decision making process.

Coupled with Land East of Billingshurst, Adversane is the only site of all the strategic sites assessed that is noted as being “tranquil”. Paragraph 174(b) of the NPPF (2023) does afford a level of protection to countryside locations that may not formally be identified within a landscape designation. As stated:

“planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

This assessment of the site further heightens the landscape harm associated by developing it however this is not reflected in the way in which the assessment of the site is undertaken (relative to other options considered).

Ecology and Biodiversity

In respect of Paragraph 175 of the NPPF (2023) plans should *“distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”* The south of Horsham is more environmentally sensitive and the allocation of Adversane as a location for major growth is inconsistent with the NPPF (2023) in this regard. The Strategic Sites Assessment (**HDCJB14b**) notes the proximity of the site to the Mens Woodland (identified as being of international importance) to the proposed allocation of Adversane.

The Habitats Regulation Assessment (HRA) notes that “a substantial proportion of Horsham District lies within 12km of the Mens SAC and Ebernoe Common SAC, including settlements such as Billingshurst, Pulborough, West Chiltington and Storrington. GIS analysis confirms that a large number of allocations fall within these zones. Developments within built-up areas is unlikely to adversely affect bat populations. However, greenfield development could result in adverse effects through the loss or fragmentation of foraging habitat and commuting routes, particularly linear features such as hedgerows, treelines and watercourses 55. Impacts may also arise from increased lighting if not appropriately controlled.” Land at Adversane is just 4.1km from the SAC.

There are significantly different ecological constraints associated with Adversane compared to the other strategic sites. Yet despite this difference they are all assessed with the same blanket approach as being “unfavorable” for the purpose of the Strategic Sites Assessment. The consequence of this when considering an assessment against the NPPF (2023) is that the onus in the NPPF (2023) to seek to allocate sites with the least environmental value does not carry through.

Q6d (iv) Delivery

We note that in respect of Adversane the HDC commented as follows as part of the December 2023 (Reg 19 Stage) **(ID-H11)** assessment of the site (in which it was dismissed for allocation):

“In light of the officer recommendation to allocate Land East of Billingshurst, and evidence that the two sites combined would represent an unachievable development trajectory in the submarket area, the level of housing this site would contribute to meeting housing needs over the plan period would be lower than suggested by the site promoters. This would therefore impact on the Council’s ability to meet housing needs, which are already constrained as a consequence of the need for the new local plan to be water neutral. The site is therefore not recommended for development.”

The Council in the update to the Strategic Sites Report **(ID-HDCJB14b)** claims that this has been addressed through the Horsham Housing Delivery Study **(ID-HDCJB20)** produced by Iceni. However, when reviewing for the relevant sub housing market area in the Iceni work it is noted:

“The high delivery period from 2032-2040 during which both strategic sites are delivery at their maximum rate [referring to Adversane and Land East of Billingshurst] would see a growth rate of 2.7% pa which is ambitious. There are feasibly some potential market capacity risks to sustaining this pace of delivery over the middle and latter parts of the plan period in a local market which is less well connected to larger employment centres than some other locations. This emphasises the importance of the delivery of employment space to help to support local demand; and to strategies for product differentiation to help to provide for a range of different markets – including build-to-rent, affordable housing and retirement living.”

It continues to state:

“It is clear that the West sub-area will need to see housing completions increase to and remain at levels near the historical peak, and for stock growth levels to be well above their historical level. This is again noted to be challenging, and to underline the need for housing development to be accompanied by economic drivers in the form of employment space.”

The updated evidence provided by Iceni continues to highlight risks of market absorption in the sub-market area. The evidence does not justify the allocation of Adversane given the challenges of delivery/market absorption in this sub-housing market area. The hope that these issues can be overcome rests upon economic drivers being forthcoming. For the reasons set out below under the “Trip Internalisation Rates” we have significant reservations that the assumed level of economic growth will be forthcoming.

Conversely, the Iceni evidence points to a growth rate for Crawley and the north sub-area of 1.1% per annum which is below that achieved across Horsham District in recent years at 1.7% and the sub-area’s average of 1.8% in recent years. This would indicate better capacity for the market to deliver to the north of Horsham (as opposed to the south).

We would welcome confirmation on this response to Matter 6d having been received.

Yours Sincerely,

Adam Kindred

SENIOR DIRECTOR
CBRE LIMITED ON BEHALF OF WAIN ESTATES LIMITED