



Our Place Sustainable Development Ltd

Matter 6d: Strategic Policy HA(NP1): Land at Adversane (Kingswood) (MM227)

Introduction

This statement is prepared on behalf of Our Place Sustainable Development Limited ('Our Place'). It responds to the Inspector's Notes IDJB06 and IDJB07, and addresses the soundness of the proposed allocation of Land at Adversane, also known as Kingswood, through the addition of Strategic Policy HA(NP1) ('the draft policy') via MM227. As set out in its representations,¹ Our Place supports the modifications and the justification for the site allocation (with a few exceptions) and responds to the Inspector's questions.

As per Our Place's previous submissions, a hybrid planning application (part outline and part full) is being prepared for Kingswood for up to 3,200 dwellings including supporting uses and infrastructure. The full element comprises detailed proposals for 314 homes, the A29 roundabout, the railway bridge and the link road to the B2133. Submission is planned for December 2026. To inform the application, Our Place has engaged with officers at Horsham District Council ('HDC' or 'the Council'),² West Sussex County Council ('WSCC') and statutory consultees. Feasibility work, assessments and progress on engagement validates and reinforces the soundness of the allocation of Land at Adversane for a new settlement.

i. Transport and movement

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

- 1.1 Part 6dii requires the construction of a railway bridge to provide access into the new settlement. This policy requirement is justified, deliverable and has been agreed in principle with Network Rail. Our Place has undertaken significant bridge design work, supported by construction consultant specialists INVUU, with regular ongoing engagement with both Network Rail (through a Basic Asset Protection Agreement) and WSCC representatives; meetings have taken place throughout 2026, including 5 meetings over summer 2026.
- 1.2 The design of the railway bridge has been progressed to 'Approval in Principle' ('AIP') stage. A draft Approval in Principle ('AIP') pack was shared with WSCC for review on 18th September 2026 with formal submission expected to be made by the end of September. Network Rail endorsement of the AIP pack will run in parallel. Final endorsement is anticipated in early November 2026. This is a significant milestone, especially one to have achieved at this early stage of the project.
- 1.3 The detailed bridge design has been costed by a third party, with highways, ramps and approach, commuted sums for ongoing maintenance, and a prudent allowance for shared

¹ Comment ID 1759.

² A Planning Performance Agreement is in place with HDC.



value all captured within the Viability Study Update (HDCJB16).³ Our Place has tested the bridge's delivery against various alternative scenarios (higher infrastructure costs, slower sales rates, delayed 3rd party approvals etc.) and found that the bridge remains viable and deliverable.

- 1.4 The bridge would be funded via a combination of development finance, shareholder loans and land receipts. The results of the Viability Study Update comfortably show that the scheme is able to achieve the delivery of the bridge whilst also meeting affordable housing requirements, CIL payments and other section 106 contributions.⁴
- 1.5 The precise trigger for the railway bridge becoming operational is a matter that will be agreed with WSCC and Network Rail through the determination of the planning application. Our Place has assumed early delivery of the bridge as part of the development phasing and is confident that this can be achieved having developed a realistic bridge and roads programme including conservative allowance for Network Rail approvals.⁵
- 1.6 The requirement for the A29 roundabout in the draft policy (6di) is also considered to be justified. The design of the A29 roundabout and the new link road to Adversane Lane (B2133) has been developed with WSCC commensurate to what is needed to support a detailed planning application. The design meets relevant standards including appropriate consideration of DMRB (associated with the A29 roundabout), the WSCC local design guide and Manual for Streets. WSCC has indicated that it is content with the principles of the design and anticipate reviewing the design during the planning determination period.
- 1.7 The roundabout is planned as the primary vehicular access into the Site and has been designed to accommodate the anticipated traffic flows. The only land that is required to deliver the roundabout is public highway land or land under the control of Our Place.
- 1.8 The proposed link road between the A29 and the B2133 has been designed to accommodate the modelled traffic flows that will use it with Kingswood fully built out. Those traffic flows have also been assessed by noise and air quality experts on behalf of Our Place to ensure that the link road can be successfully delivered alongside new housing.

The impact on the road system including the A29, Pulborough and the B2133⁶

- 1.9 Our Place considers that the allocation is justified in transport terms. The Horsham Local Plan 2040 Transport Assessment (HDCJB15b, June 2026) ('the Transport Study') shows there are only three relevant junctions that may require some mitigation because of the allocation. These are the Five Oaks Roundabout, the Stane Street/New Road Roundabout, and the A283/A29 South Roundabout in Pulborough. For all three the Study concludes that sustainable transport mitigation measures will be sufficient to avoid unacceptable impacts as a result of the development, such as improved public transport services and/or improvements to the active travel network.

³ The Housing Delivery Study (HDCJB20) states the estimated cost as being around £15m. Our Place clarifies that this is the anticipated cost of the bridge itself, but not of the total anticipated cost of delivering the bridge, which has been factored into the FVA calculations.

⁴ Viability Study Update (June 2026, HDCJB16), paragraph 8.75.

⁵ See paragraph 4.17 of Our Place's main modifications consultation response.

⁶ The Inspector's agenda refers to the A2133 though this is assumed to be a typographical error, and should refer to the B2133 (Adversane Lane) that runs along the northern boundary of the Site.



- 1.10 Part 6 of the draft policy sets out multiple expectations that cumulatively equate to a requirement for a comprehensive transport strategy for the Site. The policy itself will therefore ensure that impacts on these junctions will be adequately mitigated.
- 1.11 The Pulborough Neighbourhood Plan includes plans to deliver an active travel connection between Pulborough and Billingshurst by upgrading parts of the existing public rights of way network between the two settlements.⁷ Parts of that network run through the Kingswood site. Kingswood can contribute towards delivering that route by upgrading the parts of the public rights of way network that run through the site and positive engagement has already been undertaken with relevant community groups.
- 1.12 West Sussex County Council has submitted a consultation response in regard to MM227 (comment ID 1507) that in Our Place's view would make the policy less effective and with requirements that are not justified. Our Place has the following comments:
- 1.12.1 WSCC has requested an addition to criterion 6(d)(vi) of the draft policy to deliver improvements to the mini roundabout in Pulborough to include reference to enhancing active travel facilities. The Transport Study notes that *"A283/A29 Pulborough Roundabouts (35) - The junctions are shown to be overcapacity in the Reference Case and only get slightly worse ~2.5% in the AM peak only with the Local Plan development. There is limited opportunity to provide physical highway mitigation within Pulborough, due to lack of space and constraints created by building located close to the roadside. Sustainable measures along the corridor could be potential mitigation. No further mitigation required."*⁸ This request from WSCC is therefore not justified or necessary and should not be included in the final policy wording. Our Place therefore reiterates its suggested amendment to part 6(d)(vi) as set out in its main modifications consultation response.
- 1.12.2 WSCC has requested a new limb (f) is added to part 6 of the policy that amounts to a requirement for Kingswood to resolve an issue that predates the development by several years and arises from a legal dispute between a private landowner and WSCC regarding the landslip at Church Hill, Pulborough and that has not been evidenced as being reasonably related to the proposals. The Transport Study's (HDCJB15b) Pulborough Sensitivity Test modelled a scenario in which the Church Hill signals remain in place. It found that resulting diversions *"do not cause any additional capacity related issues"* and that *"the Local Plan flow differences do not differ greatly from the Reference Case flow differences."*⁹ Imposing such a requirement would therefore be contrary to the tests for planning obligations¹⁰ and fails to be justified as a policy requirement. There is no justification for the 150 unit trigger and Our Place has agreed with WSCC through a Transport Assessment Scoping exercise that the application transport assessment will review phasing of development and run the core test with no shuttle signals but to undertake a sensitivity test with the shuttle signals (the same approach taken in the HDC Transport Study).

⁷ Pulborough Neighbourhood Plan 2015-2031, page 51. Cycleway 2.

⁸ HDC Local Plan Transport Study, paragraph 5.2.23

⁹ HDC Local Plan Transport Study, paragraph 5.3.

¹⁰ necessary to make the development acceptable in planning terms; directly related to the development; and, fairly and reasonably related in scale and kind to the development



Sustainable transport and active travel measures and mitigation measures

- 1.13 Part 6 of the draft policy requires a comprehensive transport strategy that will include elements such as a cycling and walking strategy that will prioritise movement of people over vehicles and a bus strategy that will link Kingswood with other nearby settlements. Through the preapplication engagement it has carried out with HDC and WSCC, Our Place is confident that these ambitions can be achieved and delivered, which would include:
- a rerouted bus service that will loop through the site, with bus stops placed such that all homes will be within a 5 minute walk of a stop providing 4 buses per hour to Billingshurst station as well as buses to Pulborough station;
 - public transport connections to Horsham approximately every 20 minutes when bus and rail services are considered together;
 - extensive network of cycle paths and footways within the Site;
 - safe and secure cycle parking provided for all homes and within the public realm;
 - an enhanced sustainable transport connection between the Site and Billingshurst station; and
 - a mix of uses within the Site that will aid internalisation of trips, including schools, commercial premises, community facilities and town centre uses.
- 1.14 Our Place has engaged with WSCC, Metrobus and Compass Travel to understand their operations and explore options for redirecting bus services through the Site and increasing their frequency.¹¹ That consultation exercise has informed the bus strategy for the Site, which will provide services to Pulborough, Billingshurst and Horsham.
- 1.15 An active travel connection between the Site and Billingshurst station will be provided via Marringdean Road, on which Our Place has been engaging with HDC, WSCC and Active Travel England officers.

ii. The provision of social and community facilities

Health

- 1.16 Part 2(f) of the draft policy requires health care provision through land, buildings and/or financial contributions. Our Place has allowed for either route in its feasibility work, but prefers to deliver a facility within the neighbourhood centre in consultation with the Integrated Care Board, helping internalise trips and serve the elderly persons accommodation within the Site.

¹¹ Compass Travel operates the 100 service that runs along Stane Street adjacent to the Site. The meeting included consideration of how the 100 bus route could serve the site in different phases, and how the masterplan could be designed to improve phased bus access. The existing patronage patterns on the route were also discussed which helped to inform the bus options for the site.



Education

- 1.17 Our Place broadly supports the requirements of part 2 of the policy which is justified in the evidence base.
- 1.18 Our Place has identified land within the Site sufficient to deliver all three schools to the required capacity and is committed to safeguarding the land for such. For the secondary school that means land for up to an 8FE secondary school to ensure that it can accommodate needs both from within the Site and more widely within the Billingshurst catchment area. That also includes onsite SEND provision which will be incorporated within each school site.
- 1.19 The school locations have been identified having regard to County Council guidance and the anticipated development phasing. Our Place has closely engaged with HDC and WSCC officers. An accompanied site visit was undertaken with WSCC in early September 2026 to survey the proposed school locations.
- 1.20 The secondary school would be adjacent to Stane Street, from where it can be readily accessed and brought forward at an early stage to help address the existing capacity deficit in the Billingshurst area (as it is not dependent on new infrastructure being delivered to access it).
- 1.21 Delivering a secondary school at Kingswood will create significant public benefits. The only secondary school within the Billingshurst area is The Weald School in Billingshurst, which is also only one of two secondary schools in the District south of Horsham. The Weald School is operating beyond capacity and is unable to expand sufficiently.¹² Delivering a secondary school of up to 8FE at Kingswood, where it can address existing capacity deficit and help accommodate the needs driven by the growth of Billingshurst itself, will be a significant public benefit that cannot be achieved elsewhere in the District. An associated benefit is that a school at Kingswood can mitigate peak hour congestion in Billingshurst by capturing school trips coming from the south of the District that would otherwise continue north into Billingshurst itself.
- 1.22 Legislative changes earlier this year mean that local authorities are now more empowered to play a central role in leading the establishment of new schools, *“supporting a more locally led, transparent, and needs-based system, ensuring provision aligns closely with community requirements, demographic change, and education priorities.”*¹³ Our Place is confident, therefore, that through continued engagement with WSCC, the education provision requirements set out in the draft policy can be delivered and significant public benefits achieved.
- 1.23 Its representations to the Main Modifications (2eii) seek to clarify that the additional 2 form of entry should be reviewed based on evidenced need from the site to ensure that it meets local needs rather than more distant ones which would require primary school children to travel longer distances.
- 1.24 Our Place does not agree with the proposed amendment to criterion 2e(i) of the draft policy as suggested by WSCC in their main modifications response.¹⁴ It remains effective and justified

¹² West Sussex County Council, Planning School Places 2026, page 74.

¹³ West Sussex County Council, Planning School Places 2026, page 7.

¹⁴ Comment ID 1507.



to deliver the first primary school as a 2FE primary school that is capable of expansion to 3FE as per the wording shown in MM227.

Retail

- 1.25 Our Place supports the approach in part 2b and c of the policy to have a primary neighbourhood centre to meet community, retail and employment needs and secondary centres to meet more local need. These centres are critically important for placemaking and enables the development to provide jobs, community facilities and amenities whilst also helping to internalise trips. Further details of the amount of each use and the character of the centres can be defined at the planning application stage.
- 1.26 The provision of retail uses within Kingswood would be targeted at meeting the local needs of new residents and complementing rather than competing with existing retail uses in Billingshurst and Pulborough.

iii. Impacts and mitigation

Landscape and the countryside

- 1.27 The Site is not in an area designated for its landscape value and has been assessed by the Council as having a moderate-high capacity for large scale housing development.¹⁵
- 1.28 Our Place has conducted a zone of theoretical visibility study¹⁶ that shows the Site is well contained by landscape features such as mature trees and hedgerows both within and outside the Site, which will be protected and supported as required by part 3 of the draft policy.
- 1.29 Part 3(c) of the draft policy requires that public rights of way are maintained and increased. Both public rights of way that run through the Site will be retained and the only works proposed to them would be enhancement works to ensure that they are of suitable quality for their intended use. The development of the Site will considerably increase the amount of publicly accessible open space.

Woodland and trees

- 1.30 Our Place has carried out a full arboricultural survey of the Site. Parts 3(d) and 4(a) of the draft Strategic Policy HA(NP1) requires ancient woodland within the Site to be retained and protected. The emerging masterplan achieves this, including a 30m undeveloped buffer to the ancient woodland, with the only works carried out to the ancient woodland being ecological enhancements to improve the quality of these habitats. All veteran trees can be retained and protected.

Ecology, wildlife and biodiversity

- 1.31 There are no statutory or non-statutory nature conservation sites within or adjacent to the Site. The closest internationally designated site is The Mens SAC, 2.5km west of the Site. The

¹⁵ Landscape Capacity Study (EN08), Zone 4a, parcel 45.

¹⁶ This formed part of the Scoping Opinion Request that was submitted to Horsham District Council under reference EIA/26/0005.



qualifying feature of The Mens SAC is its barbastelle bat population. Kingswood falls within the core bat sustenance zone (6.5km radius).

- 1.32 A suite of ecology surveys has been carried out for Kingswood in accordance with a scope agreed with HDC, which has identified the likely bat foraging routes through the Site. Policies 4 and 17 of the draft Local Plan provide the policy protection against unacceptable impacts to green infrastructure and ecology.
- 1.33 The Habitats Regulations Assessment (HDCJB12) concludes that the Horsham Local Plan will avoid adverse effects on the integrity of The Mens SAC through bat habitat mitigation that is *“well established and routinely implemented through the planning process”*; the conclusion is not reliant on mitigation that would be challenging to achieve.
- 1.34 Regarding air quality effects on The Mens SAC, policy protection is afforded through part 6(e) of draft policy which requires that all car parking spaces within the Site have charging points. This policy safeguard will ensure that air quality effects on the integrity of The Mens SAC are not adverse and are in line with the mitigation strategy of encouraging the take up of electric vehicles.
- 1.35 The draft policy requires the delivery of 10% biodiversity net gain. This follows the statutory provision, which will be followed at Kingswood. A biodiversity baseline survey has been conducted and based on the emerging proposals it will be possible to achieve 10% net gain in biodiversity.

Heritage assets

- 1.36 There are no designated heritage assets within the Site. The closest designated asset is Adversane Conservation Area and its associated Grade II listed buildings as the principal built heritage receptors.
- 1.37 The Site includes an Archaeological Notification Area and archaeological work has already been undertaken, including desk-based assessment, HER review, site walkover and geophysical survey of accessible areas. This has identified potential for undesigned archaeology but no evidence to date of remains likely to require preservation in situ. WSCC has agreed that further assessment can be completed post-grant of outline planning permission.
- 1.38 Development can be set back from Adversane Conservation Area to provide a landscape buffer at the north-western edge of the Site.¹⁷ Existing trees, hedgerows and woodland can also be retained and enhanced wherever practicable as part of the wider green infrastructure framework. This will filter views of new built form and provide a sensitive transition between Adversane and the new settlement. The Site's capacity has been assessed with these mitigation measures factored in.

Climate change mitigation, drainage and flood risk

- 1.39 Homes at Kingswood will be delivered to enable the transition to net zero in accordance with part 5 of the draft policy through a gas-free heating strategy coupled with onsite energy generation via rooftop solar panels.

¹⁷ Sustainability Appraisal Report Addendum (July 2026, HDCJB13), paragraph 2.3.47.



- 1.40 The Site is entirely within Flood Zone 1, with some surface water flood risk that has been further modelled and scoped with the Lead Local Flood Authority. There is an opportunity for betterment through a comprehensive SuDS network to manage flows and avoid increasing flood risk on or beyond the Site.

Utilities

- 1.41 There is no evidence to suggest that utility constraints would prevent Kingswood from contributing the anticipated minimum of 1,425 homes within the plan period. Detailed utility due diligence has informed the emerging masterplan, phasing strategy and planning application for Kingswood. This work has considered electricity, potable water, wastewater and telecommunications infrastructure, drawing on statutory undertaker engagement, utility asset records, capacity assessments and connection offers.
- 1.42 A formal electricity connection solution of over 6MVA has been identified; more than sufficient to support the first phase of development (c.300 homes) by factor of around 5. Further capacity can be identified and delivered through a phasing and infrastructure delivery plan.
- 1.43 Southern Water has confirmed to Our Place that there is adequate existing potable water network capacity to support an assessed initial phase of approximately 400 homes providing a sufficient delivery window while the detailed scope, trigger and programme for strategic reinforcement are progressed through Southern Water's design process.
- 1.44 For wastewater, an indicative point of connection, on-site foul drainage strategy, pumping station provision, rising mains and an off-site connection concept have been identified.
- 1.45 Existing operator infrastructure is recorded within and around the site and full-fibre infrastructure can be incorporated within the primary utility and highway corridors and extended progressively alongside each phase of development.

iv. Delivery

Masterplanning

- 1.46 Our Place has progressed a comprehensive, robust and deliverable masterplan for the Site in consultation with both HDC and WSCC officers. That work is well advanced, with Our Place seeking to submit a hybrid planning application in December 2026. That application will be supported by a comprehensive Design Code for the whole site and an Illustrative Masterplan that demonstrates how the Site could be built out in a high quality and sustainable manner (as required by part 2 of the draft policy). The design of the first phase has been progressed with delivery partners in mind. Early collaboration has taken place with potential delivery partners, which has informed the Illustrative Masterplan and the sitewide Design Code to ensure that the requirements are deliverable and market-facing. Similarly, infrastructure proposals, such as the bridge, have been designed in collaboration with qualified consultants who have a track record of delivery in this area.

The funding and phasing of necessary infrastructure and mitigation measures

- 1.47 Our Place currently assumes that all infrastructure is funded through development financing, shareholder loans and land and sales receipts. Our Place has provided for appropriate allowance for section 106 financial contributions and CIL payments in line with policy, as well



as factoring in a policy compliant level of affordable housing delivery. The assumed timing of infrastructure delivery has been underpinned by preapplication discussion with HDC and WSCC officers, which will be progressed during the determination of the planning application.

The identification of any potential impediments

- 1.48 Our Place does not consider there to be any fundamental impediment to the build-out of the Site. As with any strategic allocation, infrastructure enhancements and upgrades will need to be identified, secured and phased alongside development. The evidence demonstrates that those requirements are capable of being managed through the planning application, phasing strategy and infrastructure delivery mechanisms.

Site capacity, build out rates and the build out period

- 1.49 The Site's capacity reflects the work that Our Place has undertaken with HDC officers through the preparation of a planning application and is reflective of the embedded mitigation with regard to retention of existing green infrastructure and set backs from Adversane. The site capacity is therefore well justified and deliverable.
- 1.50 Our Place considers that delivering a minimum of 1,425 dwellings within the plan period is highly achievable and represents a conservative view of what should be possible. Our Place's own development trajectory suggests that closer to 2,000 dwellings can be delivered in this timeframe. Our Place has sought to mitigate lead-in time by preparing a planning application early (due for submission before the end of 2026), including a detailed component within the planning application, and working with delivery partners on the design of that detailed component to ensure it is market-facing and deliverable. Interest in delivering phase 1 has been expressed by a number of different partners.
- 1.51 The Council have determined that the minimum figure is achievable with regard to local market absorption, including with the build out East of Billingshurst.¹⁸ With 35% of the housing at Kingswood being affordable, only circa 84 properties need to be sold each year to achieve the required minimum. That would require only two outlets achieving sales at or below what Iceni have determined to be the local benchmark. In reality, a project like Kingswood will have several outlets operating, highlighting the achievability of the housing delivery target.¹⁹
- 1.52 It is anticipated that build-out will commence in 2029 and be complete in 2047, meaning that Kingswood can make a contribution towards meeting the housing requirement beyond the current plan period.

¹⁸ Housing Delivery Study (July 2026, HDCJB20), paragraph 3.115.

¹⁹ West of Ifield, a smaller scheme than Kingswood, is expected to have 5-6 outlets operating. Housing Delivery Study, paragraph 3.49.