



Hearing Statement: Matter 5a

Horsham District Local Plan 2040 – Examination in Public

Devine Homes

St Michael's House, 111 Bell Street, Reigate, RH2 7LF

Prepared by:

SLR Consulting Limited

3rd Floor, Summit House, 12 Red Lion Square,
London, WC1R 4QH

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Acronyms and Abbreviations

ASN2	Ashington Northern Cluster Site Allocation (450 homes)
BNG	Biodiversity Net Gain
CIL	Community Infrastructure Levy
EiP	Examination in Public
HA5	Housing Allocation 5 (Ashington)
HRA	Habitats Regulations Assessment
NPPF	National Planning Policy Framework
PROW	Public Right of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SLR	SLR Consulting Ltd
SoCG	Statement of Common Ground
SuDS	Sustainable Drainage System(s)
TA	Transport Assessment / Transport Appraisal



1.0 Introduction

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Devine Homes in respect of the Horsham District Local Plan (2023 – 2040) Examination in Public. The statement focuses on questions raised by the Inspector in the published Agenda in relation to the following:
- **Matter 5a:** The Spatial Strategy and site selection
- 1.2 By way of background, Devine Homes controls approximately 11.8ha of land within the new Ashington allocation (site ASN2) which comprises agricultural/grazing fields stretching west off Billingshurst Road (Site Assessment Report Reference SA520 & SA790).
- 1.3 Part of the land (totalling 3.1ha) to the direct west of Billingshurst Road is currently subject to a live planning application¹ submitted by Devine Homes for the development of up to 65 homes.
- 1.4 Devine Homes is an experienced, high-quality housebuilder with interest in sites across Sussex, including examples of many sites in the Horsham district that have either been successfully developed, or have recently been consented. This includes previous major allocations such as land east of Billingshurst (c.500 units) which was promoted and delivered in collaboration with other housebuilders, similar to the Ashington Northern Cluster. Devine Homes prides itself on the quick delivery of high-quality, sustainable developments and is keen to ensure that its good working relationship with the Council continues long into the future.
- 1.5 Devine Homes is in **support** of the proposed Local Plan (as amended by the Main Modifications) and offers its **strong support** for the Spatial Strategy and the new allocation of site ASN2 in Ashington for up to 450 homes.
- 1.6 This statement presents the views of Devine Homes with regard the proposed Spatial Strategy (Matter 5a), confirming overall **support** for the Horsham District Local Plan and its policies and allocations.

¹ Council Reference DC/26/1037



2.0 Matter 5a: The Spatial Strategy and Site Selection

2.1 Matter 5 of the Inspector's Agenda looks to explore views on the Council's proposed Spatial Strategy and site selection. The Inspector poses three questions which we address in turn below:

(i) Spatial distribution: whether the plan's proposed distribution is an appropriate response

2.2 Devine Homes offers its general support for the Council's strategy (as amended through the Main Modifications) to spread development allocations more evenly through the district, and to direct additional growth in appropriate locations within settlements located to the south of Horsham town, including focussed growth at Ashington and Henfield.

2.3 Growth in locations within the southern part of the district (including settlements such as Cowfold, Ashington, Henfield, Partridge Green, and Storrington) ensures that the district's settlements can benefit from sustainable levels of organic growth. A strategy that balances delivery on larger sites with an increase in smaller site allocations across the southern part of the district also enables the faster delivery of homes, and this strategy is supported.

2.4 The decision by the Council to include additional housing allocations in places such as Ashington (ASN2), Cowfold (CW3) and Henfield (HNF2 and HNF3) is welcomed, and will help to address the known housing needs and demands from neighbouring coastal authorities such as Adur and Worthing. The decision to include additional site allocations in these settlements is appropriate, as the level of growth proposed accords with the characteristics and functions of the host settlements as defined in the settlement hierarchy (Strategic Policy 2). Devine Homes supports the findings of the Sustainability Appraisal 2026 which acknowledges that there is merit to further growth in Ashington in particular *"in terms of boosting supply in the south of the District where settlements are in relative proximity to the south coast towns where unmet housing need is a major issue"*.

2.5 The conclusion at Paragraph 2.2.19 of the HDC Sustainability Appraisal Addendum (July 2026) is highlighted in support of the allocation of 450 dwellings at Ashington:

"• 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."

2.6 It is noted however, that the Council has not made any provisions to help meet the needs of Brighton, which is a neighbouring authority under considerable growth constraints. Given the removal of the previous requirement for sites to demonstrate water neutrality, plus the known additional site allocation opportunities that exist within the district (including for example, a highly sustainable site at Land West of London Road in Henfield²) Devine Homes urges the Council to consider increasing the housing requirement within Strategic Policy 37 to include a specific figure to help meet Brighton's housing needs.

2.7 Whilst the stepped trajectory is noted and 6 tier approach unusual, the need to deliver new homes in the short term is pressing. For this reason, Devine Homes is in full support of the 13no. new site allocations, particularly the new allocation in Ashington (ASN2) which reduces the reliance on the longer-term, longer-lead time larger strategic sites to deliver the bulk of housing in Horsham.

2.8 In summary, the proposed allocation and spatial distribution of 13no. additional small to medium-size sites (identified through the latest schedule of Main Modifications) is **supported** as it helps to ensure that housing units can be delivered in the early part of the

² See Devine Homes' representation to the Main Modifications consultation, August 2026



plan period, ensuring that those in need can be housed quickly. The distribution of the allocations in the southern part of the district helps to address the needs of those in the coastal authorities, but it is Devine Homes' opinion that an additional number of homes to ease pressure on the stepped trajectory and account for the needs of Brighton needs to be included, with additional site allocations in existing sustainable settlements (such as Henfield) required to meet this need.

(ii) Constraints: whether the distribution of development is sound

- 2.9 As per the previous section, Devine Homes supports the overall distribution strategy of development proposed in the Local Plan which combines larger strategic sites with smaller sustainable growth within existing settlements.
- 2.10 Devine Homes is of the view that the Council has appropriately considered the key opportunities and constraints in its spatial strategy (such as landscape sensitivities, heritage assets, ecology and habitats, flood risk, and wider infrastructure) and has selected sites in the least sensitive and most sustainable locations. The conclusions of the Council's SA Addendum (July 2026) are largely supported.
- 2.11 Whilst it is acknowledged that some of the proposed site allocations do face some constraints, these can be overcome with appropriate design solutions and mitigation to ensure that no significant or unacceptable harm will occur, and that on balance, the benefits of the additional housing delivery and associated infrastructure far outweighs any harm.

(iii) Housing delivery: whether the ranges of sizes and types of site would ensure that needs are met

- 2.12 Devine Homes supports the proposed mix of site allocations within the Horsham Local Plan and offers specific support for the range, sizes and locations of allocation throughout the district (particularly within the southern part of the district). This provides a balanced and flexible strategy for meeting the identified housing, employment and infrastructure needs over the plan period, both for the Horsham district and needs originating from neighbouring coastal districts.
- 2.13 By allocating a mix of strategic sites, a range of medium-sized sites and smaller developments across different settlements (including Ashington and Henfield); the Local Plan avoids over-reliance on a limited number of large sites while still delivering the scale of growth required to address identified housing needs in Horsham and coastal areas.
- 2.14 The range of sizes and types of housing sites enables growth to be distributed in a manner that reflects the hierarchy and characteristics of the district's existing towns and villages, to ensure growth allows these settlements and their communities to adapt and assimilate.
- 2.15 The variety of site sizes also provides opportunities for a range of different housing products to be delivered, including affordable housing, self-build and specialist accommodation, which supports the creation of sustainable and mixed communities while contributing to the longer-term economic and social objectives of the Local Plan.



3.0 Summary of Matter 5a

- 3.1 Devine Homes supports the Council's proposed spatial strategy and the additional housing allocations introduced through the Main Modifications. It welcomes the more balanced distribution of growth across the district, particularly within settlements in the south of the district such as Ashington and Henfield as this allows sustainable organic growth, supports quicker housing delivery, and helps meet housing needs without placing excessive pressure on infrastructure.
- 3.2 The overall distribution of development is considered to be sound, combining large strategic allocations with smaller and medium-sized sites in sustainable locations. The Council has appropriately taken account of key opportunities and constraints when selecting the proposed site allocations.
- 3.3 Devine Homes supports the allocation of 13no. additional small and medium-sized sites, which reduce reliance on the four large strategic sites and help deliver homes earlier in the plan period. The range of sizes and types of sites proposed provides flexibility, reflects the settlement hierarchy, and allows for a range of products including affordable housing, self-build and specialist accommodation.
- 3.4 Notwithstanding its overall support for the spatial strategy, Devine Homes considers that the Local Plan is not explicit enough in its attempt to address the unmet housing needs of neighbouring Brighton and providing headroom to meet the increased delivery rates required to maintain identified supply. Owing to the immediate availability of additional sustainable development opportunities (including at Land West of London Road in Henfield), Devine Homes calls for an increase to the housing requirement to help meet Brighton's unmet need, with additional allocations found in the south of the district to address this pressing need.





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