



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 6c: Strategic Policy HA4: Land East of Billingshurst (including the proposed southern extension)

Questions i – iv

September 2026

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Issue: The soundness of the site allocations - the following covers Strategic Policy HA4: Land East of Billingshurst (including the proposed southern extension

1. Strategic Policy HA4: Land East of Billingshurst comprises, by virtue of suggested main modification MM226, two parcels of land; one north and the other south of the railway. For the purposes of this Hearing Statement these will be referred to as the northern parcel and the southern parcel respectively and Strategic Policy HA4 is abbreviated to HA4. In addition to this, the term “reasonable walking distance” used in this Hearing Statement applies the Annex B, NPPF 2026 definition of around 800 metres, or around 10 minutes’ walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away. However, it should be noted that people may be prepared to walk further to key services and facilities.
2. The Council considers the allocation site can be delivered viably within the Local Plan period, no “showstopping” issues have come to light. The policies within the plan provide the necessary and proportionate framework within which to do this appropriately and in accordance with legislation and the NPPF. Further to this, the following sets out the Council’s response on the matters raised.

Question i: Transport and movement:

i.1: Highways access arrangements

3. Primary vehicular access is expected to be off the A272 for both parcels with a road layout designed to enable a two way through bus route within both parcels. The primary access to the northern parcel will be off the A272 (also known as Coneyhurst Road). The suggested main modification MM226 seeks to amend criterion 6.b to make clear the northern parcel should have a two-way vehicular through route off the A272 to the north and east of the site. The northern access would be via the recently constructed Amblehurst Green development and the eastern would be via an improved link to Rosier Business Park. The criterion makes clear this should be implemented before or alongside development to an agreed programme of delivery. This reflects discussions with the promoters and key stakeholders, including West Sussex County Council in respect of both highways and education.
4. The policy makes clear in criterion 6.e that provision must be made within the new road layout for a secondary pedestrian, wheeling and cycle access, and if required emergency vehicles access via Brooker’s Road which lies to the west of the northern parcel. In addition, there are three existing public rights of way (PROW) which link the site to the settlement of Billingshurst. One PROW links to Broomfield Drive to the west, which facilitates access to the train station and existing schools as well as the settlement centre. Another PROW links to the A272, which facilitates access to the settlement centre. The other PROW crosses the railway line, which is subject to improvement by a bridge/underpass by virtue of the policy (HA4.6.f), which facilitates access from the north to the south side of the railway station and a couple of employment sites (Gillmans and Daux Road Industrial Estates) as well as Lower Station Road recreation ground. The latter provides a key route between the two parcels and a connection from the south to the proposed primary school and settlement centre.
5. The proposed modification MM226 includes the expansion of the strategic allocation to the south of the railway. The policy amendments are not explicit about highway access and arrangement to this parcel. Criterion 6 makes clear a comprehensive transport strategy must accompany any respective application. There is suitable prospective vehicular access, and access arrangements will be confirmed through the development management process. Pedestrian access to Daux Road already exists via the public right of way (no. 1933) and this road would provide pedestrian access and cycle links to the existing settlement of Billingshurst and its train station.

i.2: The footbridge or underpass: funding, the phasing and safeguarding

6. In addition to the framework set within criteria 1, 2.f, 5, and 6.f of the allocation policy (HA4) all relevant topic specific policies of the Local Plan should be taken into account. These include Strategic Policy 23:

Infrastructure Provision (SP23), Strategic Policy 24: Sustainable Transport (SP24), Strategic Policy HA1: Strategic Site Development Principles and Strategic Policy 19: Development Quality. SP23 sets a framework to ensure the necessary infrastructure provision is put in place at the right time and secured through planning permission by obligation, condition or through the community infrastructure Levy. It also sets a framework and requirement for a Phasing and Implementation Strategy where relevant, such as this allocation. This enables appropriate triggers to be set at planning application stage as applicable to the scheme/proposals sought in recognition that large developments can come forward in a multitude of ways (e.g. comprehensive or split site, outline, full or hybrid where the detailed part could fall anywhere within the site). In addition to this, the need and standards applicable to infrastructure requirements can change. It is not therefore considered appropriate to be prescriptive in the policy in respect of triggers.

7. All the site promoters are aware of the policy requirement for a suitable fully accessible replacement of the existing level railway crossing either with a bridge or underpass (see representations ID 906 and ID 1923). The promoters of both the northern parcel and the southern parcel have confirmed they have dedicated and safeguarded land for the provision of a bridge (or underpass). All parties anticipate a bridge will be provided; however, the policy retains flexibility to ensure appropriate replacement for the level crossing can be provided based on any updated evidence submitted with an application. There are currently no clearly itemised railway bridge/underpass costings however all parties are aware of estimated costs which are in the millions, based on examples elsewhere and advice from Network Rail. The **Horsham Local Plan Viability Update (June 2026) (HDCJB16)** took into account policy requirements and abnormal costs, such as the railway bridge/underpass provision, and found the allocation site to be viable.
8. The Council notes some representations question scheme viability given the additional cost of the rail crossing. The **Horsham Local Plan Viability Update (June 2026) (HDCJB16)** makes clear in paragraph 8.19 that their assessment is limited to the information submitted in support of the northern parcel. This is because the southern site in its own right is not strategic in scale (**HDCJB16** paragraph 8.39). Paragraph 8.19 of **HDCJB16** does however make clear that an indicative appraisal of the wider site boundary, including the southern parcel, was undertaken. Paragraph 8.31 of **HDCJB16** does make clear that a higher allowance has been used to help ensure 'abnormal costs' are taken into account, in line with the Viability PPG, and discussions between the consultant and scheme promoters have included consideration of the crossing amongst other things. Critically, paragraphs 8.32, 8.34, 8.35, and 8.166 and its summary table 8.2 of **HDCJB16**, show the East of Billingshurst site based on 650 homes to be the most viable of all the strategic site allocations assuming a combined allowance for S106 contributions, on-site infrastructure and CIL. This has concluded an uplift in land value of 35.42 times existing use value (EUV) for just the northern parcel or 34.71 times EUV when the southern parcel is included.
9. Network Rail have indicated a bridge is technically feasible within the allocation site but have raised a potential need for its location to be 20 metres to the east of the existing level crossing to avoid conflict with existing signalling equipment. The negotiations with Network Rail and the section 106 contributions cannot be finalised until the land is allocated and/or the site has planning permission securing details and phasing of development. This is not an unprecedented infrastructure requirement and there are at least three other sites within West Sussex, including one in Horsham District, which have or are in the process of delivering a railway footbridge/underpass. For example, an outline development was permitted in 2023 for 170 dwellings at a site in Pulborough which secured via s106 the delivery of a footbridge, to replace a level crossing, prior to the occupation of no more than 51 dwellings. The bridge is on track to be delivered Spring/Summer 2027.
10. In conclusion, the Council considers that the Local Plan policy sets out a suitable framework within which active travel principles can be met and a suitable solution to Network Rail's representations and public safety can be addressed within future planning applications, which the Council considers to be proportionate and sound. As explained, viability and deliverability of the necessary active travel connections have been fully considered.

i.3: The integration of sustainable transport

11. The allocation lies on the eastern boundary of the settlement of Billingshurst with safe links to existing public transport, both bus and a well-connected train station, which lies within a reasonable walking distance to much of the site. In addition, the settlement centre and/or shops and facilities near the station also lie within a reasonable walking distance to much of the site which helps to reduce reliance on private vehicles.
12. The allocation policy (HA4) provides a framework to ensure sustainable transport is appropriately integrated within any future scheme particularly criteria 1, 2.f, 5, and 6, including the submission of a comprehensive transport strategy at application stage. In addition to this, all relevant topic specific policies of the Local Plan should be taken into account which includes Strategic Policy 23: Infrastructure Provision and Strategic Policy 24: Sustainable Transport (SP24). SP24 makes clear sustainable transport includes walking, cycling, wheeling and buses. In respect of SP24.d, criterion 6.c of the allocating policy (HA4) makes clear that, as a large new development it should be feasible to make provision for bus travel/infrastructure, and expects the road layout to be designed to enable a two way through bus route within both parcels, in accordance with bus operators' guidance and requirements. This is to facilitate the delivery of bus transport over the life of the development, subject to discussions with local bus operators.
13. The main current bus operator in the area, Compass, has indicated that it is good to see new bus routes to serve new housing development, however regard has to be given to the impacts upon journey times and costs. The indication is that existing bus stops are able to serve much, if not all, of the allocated development. It is recognised that as development proceeds, including within the Adversane allocation, bus demand may increase. The policy wording therefore helps to ensure that the road layout is able to accommodate future changes in demand for and viability of new bus routes.
14. In respect of the sustainable transport offer, the Council's **Settlement Sustainability Review Assessment (EN07)** particularly its Appendix 2 (December 2022, updated July 2024) provides information on bus services and frequency (as applicable in 2024). The most frequent service within Billingshurst remains the Compass bus 100 which operates hourly through the day until late afternoon/early evening Monday-Saturdays between Burgess Hill and Horsham town centre and its bus station (travel between Billingshurst and Horsham town takes around 35 minutes). It goes via, and links, a number of the settlements in Horsham District such as Slinfold, Broadbridge Heath, Billingshurst, Adversane, Pulborough, Storrington, Washington, Steyning, Upper Beeding, Henfield. Much of the site would be within a 10 minute walk (800 metres) of this service.
15. The development allocation is also well located to Billingshurst train station which operates a twice hourly daytime service to London Victoria via Horsham and Crawley, and to the coast (Bognor Regis). Access to the train station can be obtained from the northern parcel via the public right of way to Bromfield Drive which links to Brooker's Road, and from the southern parcel via the right of way to Daux Road. The site allocation is considered to align with policy S5.1.h of the latest [NPPF \(2026\)](#) which supports housing and mixed-use development within reasonable walking distance of a well-connected station, where it is physically well-related to the station or settlement within which the station is located.

Question ii: Design, layout and facilities

ii.1: Physical integration with Billingshurst and the impact on the village

16. As raised above in answer to i.3, the allocation lies on the eastern boundary of the settlement of Billingshurst with safe links, and within a reasonable walking distance to existing public transport, the settlement centre and/or shops and facilities near the station. It forms a natural extension to the settlement and to the recent urban extension, of Amblehurst Green to the north. It mirrors the existing settlement in that it lies either side of the railway line, which cuts through the southern half of the settlement with pedestrian and/or vehicular crossings connecting the community north and south of the railway. This highlights how important the retention and upgrading of the rail crossing within the site for delivering safe connectivity between the north and south of the railway. The policy therefore recognises the importance of the existing public rights of way, including the public railway crossing (PROW 1933),

within the site and their connections, and provides a framework to enable their retention and enhancement.

17. There are trees on the boundary between the site and the urban edge of the existing settlement but there are some views through and footpaths that link the site to the existing housing. Development will provide better links between Rosier Business Park and the settlement, and it will provide public open space and a primary school, which help with both the physical and social integration with Billingshurst. The policy particularly criterion 6.d, seeks to ensure that safe pedestrian and dedicated off-road cycle routes through and around the site are provided, including an alternative to the A272. It will also provide links to the school and community hub, and safe covered cycle parking.
18. The policy also sets an appropriate framework to ensure the design and layout helps to visually integrate with the existing settlement by way of requiring a comprehensive masterplan and site-wide Design Code. Topic specific policies in the Local Plan, such as Strategic Policy HA1 and Strategic Policy 19 as modified, also seek the incorporation of character areas which respect the existing settlement and enhance the landscape qualities of the area, and the design of development to take account of the character, appearance and needs of the site and surrounding area to which it should relate sympathetically.

ii.2 The provision of social and community including the community hub

19. The topic specific policies of the Local Plan make clear development must address the additional necessary social and community infrastructure (such as, Strategic Policy 23, Strategic Policy 27, Policy 28, and Strategic Policy HA1). The **Infrastructure Delivery Plan (HDCJB19)** also provides the latest information on the infrastructure that is likely to be required to support development set out in the Local Plan and how it is expected to be delivered. Criteria 1, 2.b, 2.d, 2.e of HA4 set out some key expectations in this respect within the allocation.
20. As detailed in the **Site Assessment Report Part B (HDCJB14b)**, a primary school is to be secured within the northern parcel. The allocation, as modified by MM226, identifies the need to provide land to enable provision of a two form entry primary school with SEND and early years. This reflects the land area required for the primary school is the same irrespective of approach to construction. WSCC have confirmed that, in accordance with current standards and approach to construction, the allocation should seek land and contributions for the provision of a one form entry primary school, expandable to two forms of entry to incorporate a special support centre for special educational needs (SEND). They also advise of a preference for the early years to be adjacent or combined with the primary school. It is proposed that this is reflected in a minor amendment to MM226 (in examination document **MMJB01**) so that criterion 2.d of HA4 reads as follows, which is also presented at the end of this statement for ease of reference (amendments reflect the ultimate change to the submitted local plan policy):
 1. d) Provision of Land to the north of the railway and contributions to meet the education provision standards advise by the Local Education Authority (or any future updates) as follows:
 - i) a one form entry primary school, expandable to two forms of entry (design and land provision to meet or exceed recommended minimum to accord with best practice), to incorporate a special support centre for special educational needs (SEND); and
 - ii) provision of special educational needs (SEND)
 - iii) early years facilities suitable nursery provision to be provided in new full-day care settings, preferably located adjacent to, or combined with, the primary school site.
21. As identified on page 189 of the **Infrastructure Delivery Plan (HDCJB19)** the Health and social care generated needs of the allocation are expected to be addressed through the reconfiguration and expansion of the Billingshurst GP surgery via CIL.
22. The allocation seeks to ensure the development meets its generated open space requirements and sets out some of the expectations. Policy 28: Community Facilities and Uses provides further information on the open space, sport and recreation standards and expectations with regard to how they should be met. These are supported by the **Open Space, Sport and Recreation Review (I04)**. Its Appendix One sets out the generated open space requirements for the potential strategic allocations as in 2021, which

includes Land East of Billingshurst. Since 2021 the East of Billingshurst allocation has increased from 650 to 1,000 dwellings which means the figures presented for West of Billingshurst and Land at Kingsfold are more representative of the current HA4 allocation for 1,000 dwellings. These show the allocation would generate a minimum demand for 11.18 hectares of open space which the policy framework expects to be delivered on-site or appropriately mitigated for off-site by virtue of HA4, Strategic Policy 23 and Policy 28.

23. The allocation seeks the provision of a community hub to help create a focus and sense of place within the new community and includes examples of what this may include such as a community hall, a shop, and a café facility. The Council has engaged with Billingshurst Community Partnership and regard given to how, if at all, the allocation could help address identified community wishes. The policy is not specific, rather it provides flexibility, because such needs can change. In addition to this, any provision will need to be viably managed and maintained which can limit some types of provision that do not form part of a commercial enterprise, especially when community groups are often limited in the rents they are able to pay. The community hub location will seek to complement access arrangements to the primary school, for example, any community hub car parking may also be able to form a school drop off area. The policy sets an appropriate framework to help ensure community services and facilities are provided to help address the needs of the future occupants and facilitate social inclusion and integration with the existing community.

Question iii: Impacts and mitigation:

iii.1: Landscape and the countryside

24. The topic specific policies of the Local Plan, as modified, make clear development must be appropriate to the landscape and countryside setting (such as, Strategic Policy 11, Strategic Policy 13, Strategic Policy 19 and Strategic Policy HA1). Strategic Policy HA1 makes clear strategic sites must have a landscape-led design and layout, which responds to, and complements, positive landscape characteristics and qualities of the site and surrounding area. It seeks the provision of strong landscape buffers to any open countryside. Criteria 3 and 4 of HA4 set out some key expectations in this respect for the allocation to ensure impacts can be appropriately mitigated. This includes regard to the retention of trees and hedgerows, the protection of the north-eastern field and its borders, and the provision of landscape buffers.
25. The **Site Assessment Report Part B (HDCJB14b)**, informed by the Council's **Landscape Capacity Assessment (EN08)**, concludes that development would have adverse landscape effects but that these can be appropriately mitigated through a landscape-led approach. The site is therefore not considered undeliverable on landscape grounds.
26. The northern parcel has a greater capacity for development due to its relationship with the existing settlement edge, whereas the southern parcel is more sensitive to development because of its more unspoilt rural and wooded character, and landscape condition and value, and therefore requires a more restrained approach.
27. Development proposals will need to be informed by a Landscape and Visual Impact Assessment and respond to the landscape character of the area, having regard to the **Horsham District Landscape Character Assessment (2003) (EN05)**. Appropriate mitigation is expected to include a robust green infrastructure framework, protection of trees and hedgerows, structural planting, integrated SuDS, sensitive lighting, landscape buffers and sensitive edge treatment.
28. These mitigation measures can be secured, in accordance with policy, through parameter plans, design coding, phasing and detailed landscape assessment at the planning application stage, so that residual adverse landscape and visual effects are reduced to an acceptable level.

iii.2: Wildlife and biodiversity

29. The topic specific policies of the Local Plan, as modified, make clear development must seek to protect wildlife and deliver biodiversity net gains as applicable (such as, Strategic Policy 12, Strategic Policy 13,

Strategic Policy 17, Strategic Policy 19 and Strategic Policy HA1). In particular Strategic Policy 17 (SP17), as modified, sets out the expectations in this respect including how development should retain priority habitats and trees and provide an appropriate buffer around woodland. It makes clear such buffers must be at least 15m around Ancient Woodland, this would include the Ancient Woodland to the south of the southern parcel (commonly called Rosier Wood) which is also a designated Local Wildlife Site. SP17 seeks to ensure biodiversity net gains are delivered on-site unless it is not practicable.

30. SP17 also guides how development can contribute to the West Sussex Local Nature Recovery Strategy (LNRS), which sets out priorities and measures to optimise nature recovery opportunities. This includes protecting core areas, including Local Wildlife Sites, and to enhance them by taking opportunities to expand their habitat and to join them up. SP17 makes clear proposals shouldn't result in any loss, degradation or harmful impacts to core areas of the LNRS, such as Wilden's Meadow and Rosier Wood Local Wildlife Sites within the allocation site, unless it can be demonstrated that new opportunities will be provided that appropriately mitigate and/or compensate for the respective harm and protects the ecosystem services.
31. Criteria 3, 4 and 6.d of HA4 set out some key expectations in this respect for the allocation. They require proposals to provide a comprehensive Ecology and Green Infrastructure Strategy. The allocation takes into account the need to retain trees and hedgerows and any felling / removal will be expected to demonstrate no adverse impact upon the foraging of bats, particularly from The Mens SAC) or any other protected or notable species. That development must deliver a minimum of 10% biodiversity net gain (BNG), in accordance with the mandatory minimum requirement. Proposals will be expected to show how Wilden's Meadow Local Wildlife Site within the site will be conserved and enhanced, which reflects that it forms part of the core area of the LNRS. To comply with policy requirements, it is expected that an appropriate easement will be necessary in respect of the watercourse present in the southern parcel (10m is recommended) and a River Condition Assessment will be required for BNG.

iii.3: Heritage Assets

32. The topic specific policies of the Local Plan, as modified, make clear development must seek to protect heritage assets as applicable (such as, Strategic Policy 19 and Strategic Policy 21.). The setting of heritage assets has been a strong consideration in determining the housing number for the site. Criterion 3.d of HA4 highlights the key visible heritage assets within or near the site. This includes three listed buildings, one encircled by the northern parcel of the allocation site and one within Rosier Business Park, and a listed building near the southern parcel and the PRoW level railway crossing which HA4 seeks to be replaced by a bridge or underpass.
33. Analysis of impacts is set out in the **Site Assessment Report Part B (HDCJB14b)** and the Council's **Cultural Heritage Assessment (EN09)** (pages 24-32) assesses up to a radius of 1km from the boundary of the northern parcel allocated in the Submitted Local Plan. It is not considered there are any further heritage assets that may be affected as a result of including the southern parcel. **EN09** reflects there are no listed buildings within the developable area of the allocation, this remains true for the expansion area to the south of the railway. It also reflects that the site lies near Billingshurst conservation area to the north west of the site and within an Archaeological Notification Area, which also applies to the land south of the railway. It also flags consideration should be given as to whether there would be a source of Horsham Stone within the site that could be quarried prior to development, however, with regard to this point it should be noted the site only lies within a mineral safeguarding area for brick clay (weald clay) and not Horsham Stone. The key considerations identified in **EN09**, especially in respect of the three listed buildings detailed above, include the quantum of development particularly around the listed buildings and rural character of their setting, development height and site lines/views (including possible views to the church tower), as well as interaction between Billingshurst conservation area and the development and creation of a sense of place using traditional materials and reflecting the scale of traditional dwellings.
34. Any assessment of the impact upon the Listed Great Daux Farmhouse, to the west of the southern parcel, from a stepped and/or an accessible bridge over the railway would need to consider the effect on the asset and its significance and weigh this against the public benefits resulting from the proposal in

accordance with the latest NPPF. HDC's Conservation Officers have advised that there are no foreseen heritage reasons as to why a suitably designed bridge could not come forward.

iii.4: Climate change mitigation, drainage, flood risk and utilities

35. In addition to the framework set within criteria 1, 2.f, 5, and 6.f of the allocation policy (HA4) all relevant topic specific policies, as modified, of the Local Plan should be taken into account (such as Strategic Policy 6, Strategic Policy 7, Strategic Policy 8 and Strategic Policy 10). It is also acknowledged the Future Homes Standard and the Building Regulations provide national standards and requirements that help deliver climate change mitigation which would apply to the allocation development.
36. As recorded in the **Site Assessment Report (HDCJB14b)**, the majority of the site lies within Flood Zone 1 with some land parcels within the southern parcel in Flood Zones 2 and 3 (which runs centrally east to west through the site) and small areas of surface water flood risk dotted around both sites. It is considered there is sufficient developable land outside of Flood Zone 2 and 3 to meet the housing allocation requirements applying the sequential approach, subject to appropriate mitigation for access.
37. Nevertheless, under prevailing national policy at the time of submission, a **Sequential Test and Exceptions Test** have been undertaken in relation to the site allocations. These were updated in June 2026 to incorporate the main modifications – see **HDCJB17**. The southern parcel is referenced (SA757) in HDCJB17 however there is an error in the Flood Zone 2 and 3 percentage figures presented. These have therefore been re-run and presented at the end of this Hearing Statement.
38. The need for an exception test depends on the potential vulnerability of the site and the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3 of the September 2023 NPPF. To demonstrate the Exception Test can be passed (where applicable), it will be necessary to provide evidence that the development can provide sustainability benefits which outweigh the risk of flooding and produce a Flood Risk Assessment which demonstrates that the users of the development will be safe for their lifetime, taking into account the vulnerability of the users without making flood risk worse elsewhere, and reducing flood risk offsite where possible. The appendix to this statement, therefore, sets out the updated exceptions test for the site to confirm that the tests are met.

Question iv: Delivery:

iv.1: Masterplanning

39. An indicative site layout masterplan for the northern parcel has been removed from the policy, as indicated by MM225, MM246 and MM247. The promoters have worked up their own indicative masterplans but these may need to evolve to take into account the minimum density expectations within reasonable walking distance of a well-connected station (35dph) as per policy L3 of the latest NPPF (August 2026), and which will be applicable for the consideration of any planning application.
40. The wording in the suggested modification MM226 provides clarity over ensuring development both north and south will need to be phased with the provision of the railway bridge/underpass and school. The policy requirement is that a comprehensive masterplan is provided at the planning application stage to show how key elements of the allocation will be delivered, phased and designed. It does recognise that elements could be split north and south of the railway provided the comprehensive masterplanning of the land is not prejudiced. The Council recognises that the promoters of the southern parcel seek an amendment to this policy requirement and suggest it be amended to a requirement for a comprehensive masterplanning framework with separate masterplans, Design Codes, phasing plans and planning applications for the north and south land parcels.
41. The Council considers the MM226 policy wording to be appropriate especially when at application stage other relevant material considerations are to be taken into account so if an alternative approach can meet the expectations it is unlikely to prejudice the submission. Indeed, it is understood that all the promoters are willing to enter into a joint consortium and will potentially prepare a joint infrastructure report signed by all parties. Such an approach is likely to be material to any application that may come forward for just the northern parcel or southern parcel.

iv.2: Commencement and build out rates

42. The policy expects the whole allocation to be delivered within the plan period.
43. Paragraphs 3.69-3.80 of the **Horsham Housing Delivery Study Update (HDCJB20)** assessed the build out rates assumptions and timetable suggested by the developers, which indicated completions commencing in 2028/29 and build out of the site by 2032/33. It suggests that a more cautious build-out rate assumptions should be adopted, where first completions occur in 2029/30 or 2030/31, nevertheless it concludes there is a strong prospect that the full 1,000 homes could be delivered within the plan period. Table 1 below sets out the trajectory in **HDCJB20** as advised by Crest and Bellway who confirm in their representations to the suggested main modifications (**Main Modification Comment ID /906**) that they remain committed to this delivery timeframe but do not object to the suggested slightly later delivery timeframe (eg completions starting 2029/30 or 2030/31 meaning build out of the allocation in 2033/34 or 2034/35). The southern parcel is expected to come forward in the medium-term.

Table 1: Assumed build out rates for East of Billingshurst set out in HDCJB20 as advised by the developers for the northern parcel

Year	Crest	Bellway	Total
2028/29		25	25
2029/30	75	75	150
2030/31	75	75	150
2031/32	100	75	175
2032/33	75	75	150
Total	325	325	650

44. Even if the more cautious delivery timeframe is applied the allocation is viable and deliverable within the plan period (by 2040).

iv.3: Funding and phasing of infrastructure and mitigation measures

45. Negotiations are ongoing in relation to the funding and phasing of key infrastructure and this continues to evolve. The **Horsham Housing Delivery Study Update (HDCJB20)** sets out some information in respect of this based on developer information which is informed by key stakeholders.
46. Paragraph 3.71 of **HDCJB20** advises that much of the infrastructure can be addressed by provision on site (secured by condition and/or section 106) or through a s278 agreement with WSCC to support off-site highway works. In addition to this CIL will also apply.
47. Paragraph 3.72 of **HDCJB20** highlights site enabling works will be undertaken at an early stage within the northern parcel, which includes the provision of access from the A272 to the southern part of the northern parcel to enable a serviced plot for the primary school as part of the first phase of development. HA4 requires that the developers will provide serviced land and a commensurate financial contribution towards the primary school places generated by their development. This will enable WSCC to build the school concurrently, and phased appropriately, with the build out of housing. To comply with SP23, financial contributions should be secured as appropriate to address the generated demand for secondary school places.
48. Paragraph 3.73 of **HDCJB20** assesses the electricity network in the west of the District around the Billingshurst area and indicates reinforcement works shouldn't result in significant delays for initial phases of residential development in this part of the District. It is considered that upon adoption the Local Plan, the network operator SSEN will have clear parameters to which to work to in respect of more substantial reinforcement/capacity works which will help reduce electricity capacity issues causing delays. Indeed, some infrastructure falls within statutory providers control and their duty to ensure a level of service is provided within reasonable timeframes.

49. Paragraph 3.74 of **HDCJB20** raises the need for a bridge over (or underpass of) the railway. It is required by HA4 that the developers must provide this, and as such will be expected to pay all the necessary costs needed to deliver the bridge/underpass to minimise public safety risks and that Network Rail would apply for any PRoW diversion needed, build the bridge, and maintain the bridge (if it is not adopted by WSCC). The trigger and phasing of the bridge will depend upon how the allocation comes forward. The expectation is for early delivery in order to minimise safety issues from increased use of the crossing from leisure use etc. For example, similar to a recent proposal in Pulborough discussed above, delivery of the bridge prior to occupation of no more than 51 dwellings. Thus, the trigger and phasing will be subject to negotiation at planning application stage.

iv.4: Potential delivery impediments

50. All infrastructure necessary to support development that is delivered by a third party has the potential to form an impediment where development phases are linked to the delivery of respective infrastructure. The Council seeks to minimise such issues through engagement with statutory providers particular in respect of the Infrastructure Delivery Plan which is a live document and subject to regular updates (latest version June 2026 – examination document ref: **HDCJB19**). In this respect, there are a few potential delivery impediments but none are considered to be showstoppers nor likely to impede the build out of the allocation to the extent that its delivery is not within the Local Plan period.
51. Paragraphs 3.69-3.80 of the **Horsham Housing Delivery Study Update (HDCJB20)** set out many of the key potential delivery impediments which have been considered in response to iv.3 above. The replacement of the level railway crossing is not unprecedented but not commonly required and has understandably given rise to concerns over its delivery and impact on the timeframe of development.
52. Paragraph 3.74 of **HDCJB20** highlights the replacement of the crossing with a bridge/underpass is technically feasible, Network Rail is supportive, and that financial contributions have been factored into the Plan's viability analysis. The Council acknowledges that representations raise Network Rail have a Shared Value Programme/charge air rights (e.g. seek monies linked to the size of a development that seeks or requires infrastructure over the railway separate to the capital cost of construction of the infrastructure). A level crossing already exists and the bridge/underpass infrastructure is in response to railway safety. Network Rail have indicated any such costs, if sought, would not undermine the delivery of the development. It is understood that a commuted sum for management and maintenance would be required by Network Rail if this were to fall to them. Anecdotally the lifespan of a bridge is 30-50 years which means maintenance charges should be comparatively low compared with shorter lifespan infrastructure, especially when current maintenance requirements of the level crossing are taken into account.
53. As raised in response to i.2 and iv.3 above, the Council has secured a similar footbridge which is on track to be delivered within four years of outline planning permission being granted. Unlike that application, the developers of the East of Billingshurst allocation have prior knowledge of the need to deliver a bridge. Similar to the primary school, all necessary permissions for and the delivery of the bridge can take place concurrently with that for the build out of the allocation. Given the evidence outlined, the Council is confident that the delivery of a bridge (or underpass) over the railway will not form an impediment to delivery of the allocation.

Further Proposed Modifications

54. The following table sets out the suggested modification put forward within this Hearing Statement.

Paragraph / Policy Number	Suggested Change	Reason
Strategic Policy HA4	Amend Criterion 2.d (as originally modified by MM226) to read: d) <u>Provision of land to the north of the railway</u> and contributions to meet the education provision standards advise by the Local Education Authority (or any future updates) as follows: i) a one form entry primary school, expandable to two forms of entry (design and land provision to meet or exceed recommended minimum to accord with best practice), <u>to incorporate a special support centre for special educational needs (SEND); and</u> ii) ~~provision of special educational needs (SEND)~~ iii) ~~early years facilities~~ <u>suitable nursery provision to be provided in new full-day care settings, preferably located adjacent to, or combined with, the primary school site.</u>	To reflect the local educational authority requirements.

APPENDIX

Exception Test for the Southern Parcel of the Land East of Billingshurst (SA757)

1. An Exception Test is required for 'more vulnerable' development, including residential development, 'essential infrastructure' and 'highly vulnerable' development. To demonstrate the Exception Test can be passed (where applicable), it will be necessary to provide evidence that the development can provide sustainability benefits which outweigh the risk of flooding and produce a Flood Risk Assessment which demonstrates that the users of the development will be safe for their lifetime, taking into account the vulnerability of the users without making flood risk worse elsewhere, and reducing flood risk offsite where possible.

Table 2: Flood Risk - Land East of Billingshurst: North of the Railway (SA118), South of the Railway (SA757) and combined (SA118 & SA757)

Site	Risk Ranking	Vulnerability	Flood Zone 1	Flood Zone 2	Flood Zone 3	Proportion of Site within 1000 year RoFSW (%)	Proportion of Site within 100 year RoFSW (%)	Proportion of Site within 30 year RoFSW (%)
SA118 North of the Railway	7	More Vulnerable	100%	0.00%	0%	5.07%	1.84%	1.13%
SA757 South of the Railway	1	More Vulnerable	94.98%	4.18%	5.11%	20.16%	6.61%	1.69%
SA118 & SA757 Combined	1	More Vulnerable	98.29%	1.40%	1.71%	11.80%	4.05%	2.51%

Assessment against NPPF (paragraph 163 of Sept 2023 / para 169 of Dec 2023)

2. To pass the exception test it should be demonstrated that both the following can be satisfied:
 - a) The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall.

a) *The development would provide wider sustainability benefits to the community that outweigh the flood risk:*
3. The delivery of the site will increase the supply of housing in the district, including affordable housing, thereby contributing to the housing requirement and addressing the housing need which has been identified in the District Plan to 2040.
4. The proposal is for an urban extension to deliver primarily residential adjacent to Billingshurst, which is a second tier settlement, a small town/large village, as defined in Strategic Policy 2 of the Local Plan. As such it is one of the most sustainable settlements in the District, providing access to a good range of services, facilities, strong community networks, local employment and public transport, including a railway station. A large proportion of the site lies within 800 metres of a well-connected train station (as defined in NPPF, 2026). The development of the site for residential or mixed-use development, on the

basis of its location, is strongly supported in policy S5.h of the latest NPPF (August 2026) under which an application would be considered against.

5. On this basis, the site's sustainability is considered to outweigh the flood risk, particularly given that the areas of the sites in Flood Zones 2 and 3 could be excluded from residential development and appropriate mitigation could be provided for access.

b) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall:

6. The majority of the site lies within Flood Zone 1, however a strip running west to east in the middle of the site which, overall, is considered to have less development potential than land either side within the site, is within Flood Zones 2 and 3.
7. As part of the site is located in Flood Zone 3, it will be necessary to assess the development under design flood conditions and provide appropriate mitigation in accordance with the guidance set out in the SFRA and the advice of the EA. The assessment will also need to account for the risk of flooding from surface water. Development in flow paths should be avoided. A surface water drainage strategy should be provided which utilises Sustainable Drainage Systems to reduce the rate of discharge to greenfield runoff rates in accordance with the guidance set out in the SFRA and advice of the LLFA (WSCC). The drainage strategy should address any isolated patches of surface water flooding on site. No development should be located in Future Flood Zone 3b unless a reduced Flood Zone 3b extent can otherwise be demonstrated through modelling.

Figure 1 Land East of Billingshurst

