Horsham District Council

Horsham District Local Plan Examination

Land East of Billingshurst (HA4)

November 2026

Document Reference:

HDCJB45

Strategic Policy HA4: Land East of Billingshurst

1. At the Local Plan Hearing sessions in October 2026, Local Plan Inspector, Jonathan Bore, asked Horsham District Council and the site promoters the Land East of Billingshurst to provide an agreed statement that gives clarity on the delivery of shared infrastructure across both sites. Supporting text/policy amendments were to be amended accordingly. Clarity on the phasing and delivery of the railway bridge and on the trajectory was also sought. This paper therefore forms the agreed statement, acknowledging there remains some dispute over the amendments to be made to the supporting text and policy.

2. Officers from Horsham District Council engaged the promoters via email correspondence. This engagement resulted in the production of Table 2 overleaf.

3. The Council therefore intends to put forward the amendments in Table 2 as further main modifications, or minor modifications as appropriate, to the Local Plan (as amended by MM220-MM226).

4. The promoters and Horsham District Council agreed that other than the proposed modifications, it is considered the delivery of infrastructure and respective triggers are best placed to be determined at the planning application stage taking into account detailed matters, latest standards and best practice, as well as Strategic Policy 23 (as amended).

5. The promoters also confirmed they agree with the Council's trajectory provided in it's Matter 5 Hearing Statement which is provided in Table 1 below for ease of reference. This takes into account market capacity, the delivery of the Adversane allocation, and the coordination of the overall masterplan and infrastructure. It shows completions starting in 2030/31 which is considered to be more appropriate, and the more conservative 120 maximum a year with a flatter curve is considered reasonable. All development would be complete within the Local Plan period.

Table 1: Housing trajectory for Strategic Allocation East of Billingshurst.

		27/28	**28/29**	**29/30**	**30/31**	**31/32**	**32/33**	**33/34**	**34/35**	**35/36**	**36/37**	**37/38**	**38/39**	**39/40**
		Y5	**Y6**	**Y7**	**Y8**	**Y9**	**Y10**	**Y11**	**Y12**	**Y13**	**Y14**	**Y15**	**Y16**	**Y17**
Land East of Billingshurst - HDC	**1000**				50	75	120	120	120	120	120	120	100	55

Table 2: Table setting out agreed, or otherwise, approach to clarify the delivery of shared infrastructure across both sites within the Strategic Allocation: Land East of Billingshurst.

The proposed new modifications are shown in bold. Previously consulted upon modifications are not shown in bold. (Inserted text is underlined, deletions are shown struck through):

Crest, Bellway and Richborough reserve the right to comment on all aspects of the emerging plan including the Further Main Modifications Consultation scheduled for 17th November 2026 to 5th January 2027.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
Para 10.110	**Amend paragraph, primarily to reflect the removal of Wilden's Meadow LWS from the allocation boundary on the policies map, so that it reads:** "Development of the site will form a landscape led urban extension adjacent the existing village and connect to the current expansion of the village north of the A272. The site will provide ~~650~~ **at least** 1,000 new homes during the plan period to 2040. ~~Although not set within a wider 30 year vision,~~ ~~o~~Once complete, the site will provide family housing (including affordable homes), a new primary school, footpath safety improvements over the railway, ~~a~~ new station car park(s), public open space including a playing field, employment and community facilities. There is also the opportunity to ~~conserve and enhance the Local Wildlife Site within the~~	**Richborough**: seek inclusion of "at least" before 1,000 new homes; **and** removal of "on-site" (re BNG). This is sought for consistency with policy wording. **Crest and Bellway:** seek the removal of provision of station car parking sites (plural).	**Minor Modification** (NB the hectarage in para 10.109 will also be amended to reflect removal of Wilden's Meadow LWS [c. 3ha] as well as the addition of the land south of the railway. This will supersede modification MM220.) RE "at least" – included as sought by Richborough on basis it is consistent with criterion 1 of the policy. Re "on-site" (re BNG) - included for consistency as reflects longstanding text in opening para of policy criterion 4. RE station car parks – the Hearing actions do not seek the removal of any infrastructure from the policy requirements. The Council refers to station car parks to take account of the generated needs of development within the Billingshurst area and the opportunity presented by the split site.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	~~eastern part of the site,~~ ~~and~~ provide a minimum ~~12~~ 10% biodiversity net gain **on-site and appropriately buffer the adjacent Ancient Woodland and Local Wildlife Sites (Wilden's Meadow and Rosier Wood which is also Ancient Woodland).**"		
Para 10.112	**Amend final sentence, to make clear in which parcel the Gypsy & Traveller pitches will be delivered, so that it reads:** "This includes the provision of a gypsy and traveller site accommodating at least five pitches **within the parcel north of the railway** and provision of all necessary ancillary space and facilities."	**Crest and Bellway:** have no comments on this change. **Richborough:** support the change made by HDC to incorporate "within the parcel north of the railway" and have no further comments.	**Minor Modification** To provide clarity on the delivery of shared infrastructure.
Para 10.113	**Amend third sentence, to make clear in which parcel the primary school will be delivered, so that it reads:** "~~**The masterplan for this site identifies land**~~ **North of the railway is to provide land** for a primary school that must at least meet the minimum recommended education space requirements for a two-form entry primary school with SEND and early years provision (e.g. 2.2 hectares)."	**Crest and Bellway:** made a representation on the policy text in respect of 1FE expandable to 2FE primary school. Paragraph 10.5 is no longer consistent with the policy at criterion 2d). **Richborough:** support this change and have no further comments.	**Minor Modification** To provide clarity on the delivery of shared infrastructure. The land required for a 1FE expandable to 2FE primary school is the same as that required for a 2FE primary school, and the text is as submitted.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
Para 10.114	**Amend seventh sentence, as amended by MM223, to include the occupation of the school as one link to the railway bridge provision, so that it reads:** "~~and~~ It should be wheelchair friendly before all dwellings are complete **or the occupation of the primary school, whichever is the earliest.** "	**Crest and Bellway**: seek the deletion of "public safety risks" *(in MM223)* as not evidenced it is directly linked to residential. If retained seek amendment to "probable public safety risks ~~that arise solely from the provision of additional housing within this development as identified by Network Rail~~ arising from both the population increase from the new residential and the delivery of the new primary school". **Richborough:** on the basis it has not been proved, request Crest's suggestion be amended to "possible public safety risks ~~that arise solely from the provision of additional housing within this development as identified by Network Rail~~ arising from the population increase from the development of the site." **Richborough:** do not agree with the use of the word Probable this is felt to be too strong a word choice, the use of this words essentially states that the safety risks exist. We think use of the word possible is better as the safety risks have not been proven. **Richborough:** sought the inclusion of "the	Reference to "public risks" is within unaltered submission text. The wording the promoters seek to change was subject to public consultation prior to the Hearing. There was no direction at the Hearing for a need to alter the amendment or its reference to "public safety risks". This is not a matter arising from the Hearing Actions. The Council consider the text to be appropriate and reasonable, it reflects objectors concerns and the need for similar provision within other developments in Sussex.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
		occupation of" the primary school.	
Para 10.118	**Amend to insert a sentence at the end, to indicate where C2 accommodation is likely to come forward, so that it reads:** "**It is recognised the majority of infrastructure is coming forward on the northern parcel so the provision of C2 accommodation may only come forward within the southern parcel.**"	**Richborough**: sought the deletion of "in a location with good links to the facilities at the railway station and to those to be provided in the northern parcel." which the Council had originally included at the end. **Richborough:** support this change and have no further comments. **Crest and Bellway** support this change.	The Council has deleted the proposed text requested by Richborough. It is considered this is appropriately covered by Policy 42, as amended by MM168, and policy HO9 of the latest NPPF.
HA4: **criterion 2 (opening para)**	**Amend opening paragraph of criterion 2 to read:** "Development will be in accordance with a comprehensive masterplan**ning framework for the whole site allocation,** to be agreed with the Council**,** which clearly ~~**shows**~~ **identifies** the key **infrastructure and land use** elements of development **and the strategic relationships between land north and south of the railway. Separate masterplans, ~~a comprehensive site-wide~~** Design Code**s, ~~a clear~~** phasing **and implementation** plan**s,** and ~~**a**~~ **planning applications may be**	**Crest and Bellway** support this change. **Richborough:** raised a grammatical matter/query to ensure the "a" was struck through so it reads "and planning applications".	

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	prepared and brought forward for the land north and south of the railway where it is demonstrated that they are coordinated and consistent with the overarching masterplanning framework and would not prejudice the comprehensive planning or delivery of the wider allocation, including the provision of a railway bridge/underpass. The development of the whole site allocation ~~**and**~~ will provide the following:"		
HA4: criterion 2.a	**Amend criterion 2.a to read:** "In the period to 2040, at least ~~650~~ 1,000 residential units (C2 and C3 Use Class), a minimum 35% of which will be affordable, together with provision for young families, older people, and**, to the north of the railway,** the provision of a permanent Gypsy and Traveller site of 5 pitches."	**Crest and Bellway:** have no comments on this change. **Richborough:** support this change and have no further comments.	
HA4: **criterion 2.b**	**Amend criterion 2.b to read:** "A community hub shall be delivered **north of the railway** providing facilities such as a community hall, a shop, and a café facility, and designed to create a	**Crest and Bellway:** have no comments on this change. **Richborough:** have no comments on this change.	

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	focus and sense of place within the new community, and to facilitate social inclusion and integration."		
HA4: criterion 2.d	Amendments to criterion 2.d are proposed as detailed in the Council's Hearing Statement to accord with WSCC education requirements. These amendments are not directly related to Actions. They read: "Provision of ~~L~~land to the north of the railway and contributions to meet the education provision standards advised by the Local Education Authority (or any future updates) as follows: i. ~~*a one two form of entry primary school, expandable to two forms of entry (design and land provision to meet or exceed recommended minimum to accord with best practice)*~~ 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 for special educational needs (SEND); and~~	**Crest and Bellway:** seek clarity that the southern parcel will also provide contributions. **Richborough:** are happy to agree to this change and / or the change suggested by the council in further notes to include from the wider allocation respectively.	The Council consider that the reference to contributions comes after the reference to "the north of the railway" it does not therefore just relate to the northern parcel. In addition to this, policy 23 would apply (as amended). The Actions do not suggest an amendment to this is necessary. The wording is also consistent with other strategic allocations. However, if critical that agreement is reached this could be explored. For example, it could read "and contributions from the wider allocation respectively…"

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	~~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."		
HA4: **criterion 2.e**	Amend criterion 2.e to replace 'in accordance with' to 'having regard to' as directed by the Inspector (does not relate to the Actions set specifically for HA4). Also an amendment to replace "comprehensive" with "coordinated" as sought by Charlie Collins at the Hearings. So that it reads: "Formal and informal open space, sport and recreation provision shall be provided to meet the needs of the new community ~~**in accordance with**~~ **having regard to** standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021 (or any subsequent updates). Informal open space provision must be designed in a ~~**comprehensive**~~ **coordinated** manner across both parcels of land ~~for all~~ and shall include (but not limited to):"	**Crest and Bellway:** support this change. **Richborough:** agree and have no comments on this change.	The potential change from "comprehensive" to "coordinated" was raised in the Hearings.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
HA4: **criterion 3 (opening para)**	**Amend second sentence of the opening paragraph of criterion 3 to read:** "Prior to any development a site-wide landscaping strategy shall be submitted and agreed or where demonstrated not to be prejudicial to the comprehensive masterplanning **framework for the whole site allocation ~~of the land~~**, two strategies split north and south of the railway."	**Crest and Bellway:** have no comments on this change. **Richborough:** agree and have no comments on this change	
HA4: **criterion 4 (opening para); and 4.a**	**Amend the opening paragraph of criterion 4 and criterion 4.a to read:** "Proposals must provide a comprehensive Ecology and Green Infrastructure Strategy, or where demonstrated not to be prejudicial to the comprehensive masterplanning **framework of the whole site allocation ~~of the land~~**, two strategies split north and south of the railway, incorporating a Biodiversity Net Gain Plan, to demonstrate how a minimum ~~12~~ 10% net biodiversity gain will be achieved on the site, and in particular demonstrate: How the **ancient woodland and** Local Wildlife Site**s** (**Rosier**	**Crest and Bellway:** have no comments on this change. **Richborough:** agree and have no comments on this change	NB: enhancement can be done off-site via buffer provision.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	Wood and Wilden's Meadow) shall be conserved and enhanced**, such as, the provision of appropriate buffers** ~~*north of the railway*~~;"		
HA4: **criterion 5**	**Amend criterion 5 to insert "(s)" at the end of masterplan to reflect there may be more than one masterplan.**	**Crest and Bellway**: have no comments on this change.	**Minor Modification**
HA4: **criterion 6**	**Amend the opening paragraph of criterion 6 to read:** "The proposals must be accompanied by a ~~**comprehensive**~~ transport strategy **which demonstrates it is in accordance with the agreed comprehensive masterplanning framework and a coordinated approach,** with development to include a legible layout which facilitates and supports all modes of sustainable transport including active travel, and provides clear and safe linkages throughout the site and to adjacent neighbourhoods, local services, facilities, the railway station, and the countryside. Proposals should include:"	**Crest and Bellway:** have no comments on this change. **Richborough:** agree and have no comments on this change.	
HA4: **criterion 6.f**	**Amend criterion 6.f to read:** "The development must provide appropriate safety improvements in	**Richborough**: request the removal of "at a point to be agreed" or request that the word "either" is placed within the final sentence for	The Council consider the policy and supporting text as amended by MM223 and MM226 made clear provision was to be

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	respect of the railway line and the public right of way crossing in consultation with and agreement from Network Rail, ~~and~~ West Sussex County Council and the Council so that the level crossing is closed and replaced with a bridge or underpass within the site. The replacement crossing must enable, **and ultimately provide,** safe pedestrian, wheeling and cycle access over the railway **and, in accordance with a phasing and implementation plan to be agreed with the Council, shall be coordinated with the occupation of development which shall be determined at application stage**. Prior to formal agreement, the layout shall safeguard land adjacent the railway ~~around the existing footpath level crossing~~ as appropriate to address network rail signalling and other requirements to provide ~~the ability~~ for the provision of a ~~future~~ footbridge or underpass ~~to enable safe pedestrian, wheeling and cyclist crossing of the railway~~. Provision must be phased in accordance with **public and** railway safety requirements, and where not provided from the outset designed and	clarity. So that it reads "..at a point to be agreed either prior to occupation or…" **Crest and Bellway:** Main Modification representations were focused on the Policy HA4 and made no comment on the wording at 6f. re the footbridge. They object to the introduction of the term *'public and' railway safety* – which is more significant, and may infer that the situation has been evidenced now by either Network Rail or the Promoter - which on the subject on railway safety it has not. **Crest/ Bellway:** are content to leave it to the application stage.	phased with development and provided before / prior to the completion of all dwellings. It never stated "upon completion" (*for the reasons raised by the objectors to the allocation where the final dwelling is not provided nor the bridge*). The inclusion of 'public *safety*' reflects the previously consulted upon modification MM223 *(see para 10.114 above)*. The Council consider the text to be appropriate and reasonable, it reflects objectors concerns and the need for provision within other developments in Sussex.

Para / Policy number	Proposed HDC modification	Promoter response (Agree / disagree / suggested further amends)	Further notes
	land safeguarded to enable ramped wheelchair accessible provision **in** ~~due course~~ **accordance with a phasing plan to be agreed by the Council so that provision is in place at a point to be agreed prior to completion of all dwellings or occupation of the primary school whichever is the earliest.** "		
HA4: **criterion 6.g**	**Amend criterion 6.g to read:** "A comprehensive Travel Plan and a Construction Travel Plan **which demonstrate they are in accordance with the agreed comprehensive masterplanning framework and a coordinated approach,** to be agreed by the Council and Local Highway Authority is submitted, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy, and which must include a monitoring framework and review mechanism to ensure the ongoing effectiveness of measures proposed. Electric vehicle charging points must be provided for all car parking spaces to mitigate air quality impacts on The Mens SAC ~~W~~woodland."	**Crest and Bellway:** have no comments on this change. **Richborough:** agree and have no comments on this change.	