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Horsham Local Plan Sustainability Appraisal (SA)

SA Report Addendum

November 2026

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Quality information

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Non-technical summary

This is the second SA Report (SAR) Addendum published for consultation alongside proposed Main Modifications to the Horsham Local Plan, as submitted in July 2024.

This SAR Addendum presents an appraisal of the Further Main Modifications that are currently published for consultation, and it is important to be clear that the Further Main Modifications that are a focus of the current consultation, and therefore this SAR Addendum, are limited in scope.

The context is that the Further Main Modifications were finalised for consultation following: A) an initial consultation on Main Modifications between 13 July 2026 to 24 August 2026 (with an SA Report Addendum published alongside); B) examination hearing sessions held between 13 October 2026 to 22 October 2026; and C) publication of a Post Hearings Letter from the Planning Inspector tasked with examining the Local Plan on 30th October 2026.

The previous consultation on Main Modifications in July/August 2026 was much broader in scope and accordingly so was the appraisal work presented within the SAR Addendum at that time. In particular, a key focus of that SAR Addendum was presenting an appraisal of the Council's proposed approach to significantly boosting housing land supply over the plan period (and, in turn, the housing requirement) alongside a series of reasonable alternatives.

At the current time there are no reasonable alternatives, and so the aim of this SAR Addendum is simply to present an appraisal of the Further Main Modifications.

This SAR Addendum is structured so as to simply present a discussion of the Further Main Modifications 'in the round' under each element of the SA framework in turn. Specifically, the SA framework consists of a list of 17 sustainability topics, each with an associated objective.

The conclusion of the appraisal is as follows:

> The Further Main Modifications themselves have very limited implications for sustainablity objectives, but it is appropriate to now reach a more favourable conclusion in respect of the Local Plan as a whole (as modified) under the 'Flood risk' topic heading, because the Environment Agency has now been consulted. A small number of the Further Main Modifications give rise to a degree of tension with certain sustainability objectives, most notably in respect of biodiversity and climate change mitigation, but concerns are limited. There is support for additional policy wording in respect of site-specific transport infrastructure requirements. Also, there is generally support for adjustments to policy wording that provide further confidence that sites can viably be delivered in accordance with the Local Plan.

With regards to next steps, the Inspector's recent Post Hearings Letter explains: *"I will submit a report to the Council in due course, which will recommend main modifications required to make the plan sound. I anticipate submitting this no later than January 2027. The examination will remain open until my report is submitted."*

1. Introduction

1.1.1. This is the second SA Report (SAR) Addendum published for consultation alongside proposed Main Modifications to the Horsham Local Plan, as submitted in July 2024.

1.1.2. This SAR Addendum presents an appraisal of the Further Main Modifications that are currently published for consultation, and it is important to be clear that the Further Main Modifications that are a focus of the current consultation, and therefore this SAR Addendum, are limited in scope.

1.1.3. The context is that the Further Main Modifications were finalised for consultation following: A) an initial consultation on Main Modifications between 13 July 2026 to 24 August 2026 (with an SA Report Addendum published alongside); B) examination hearing sessions held between 13 October 2026 to 22 October 2026; and C) publication of a Post Hearings Letter from the Planning Inspector tasked with examining the Local Plan on 30th October 2026.

1.1.4. The previous consultation on Main Modifications in July/August 2026 was much broader in scope and accordingly so was the appraisal work presented within the SAR Addendum at that time. In particular, a key focus of that SAR Addendum was presenting an appraisal of the Council's proposed approach to significantly boosting housing land supply over the plan period (and, in turn, the housing requirement) alongside a series of reasonable alternatives.

1.1.5. At the current time there are no reasonable alternatives, and so the aim of this SAR Addendum is simply to present an appraisal of the Further Main Modifications.[1] It is important for SA work to focus only on 'significant effects', and at the outset it was far from clear that the Further Main Modifications would likely generate significant effects. However, on balance it was considered appropriate to prepare this SAR Addendum to inform the current consultation.

1.1.6. This SAR Addendum is structured under the 'SA framework', which comprises a list of 17 sustainability topics, each with an associated objective. Under each topic the aim is to present an assessment of the Further Main Modifications as a whole (i.e. the aim is not to appraise every Further Main Modification under every topic). Also, each of the topic-specific discussion begins by presenting a contextual discussion of previous conclusions reached in respect of significant effects.

1.1.7. The following sections appraise the Further Main Modifications under each SA framework topic in turn, before a final section presents conclusions.

2. Housing

2.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a significant positive effect but also concluded *"there are clearly matters that warrant ongoing scrutiny through the Examination in Public."* Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters including:

- The housing requirement – should be set above local housing need (LHN) over the plan period so as to provide not only for locally arising needs but also half of Crawley's unmet need and a proportion of unmet need arising from the south coast. Also, it is justified for the housing requirement to be 'stepped' meaning that it increases over time, given the challenge of boosting supply in the early years of the plan period.

[1] The conclusion that there are no reasonable alternatives is considered to be clear cut. At the previous stage reasonable alternatives were considered in respect of the matter at the very heart of the local plan, namely the 'spatial strategy' (i.e. the proposed approach to housing land supply over the plan period), for the reasons set out in Section 2.1 of the July SAR Addendum, but the spatial strategy is not a focus of the current consultation. Also, it can be noted that the 30th October Post Hearings Letter does not serve to highlight any of the matters that are a focus of the current consultation on Further Main Modifications as being of particular significance, such that there might feasibly be a case for exploring reasonable alternatives.

- Spatial strategy – the Inspector's key quote in respect of the spatial strategy is presented below in Section 3, but the key point to note here is that the Inspector states: *"This is an appropriate way to address housing and community needs...."*
- Affordable housing – the Post Hearings Letter finds the proposal to reduce the required level of affordable housing from a headline figure of 45% to 35% is found to be sound. The July SAR Addendum stated: *"There is clear evidence for this approach (the Viability Study, 2026) but there is a need for ongoing consideration of how competing policy objectives / asks with cost implications are being prioritised."*
- Delivery risks – the Post Hearings Letter recognises that there are inevitably some delivery challenges, including relating to timely provision of services and utilities in support of new homes, and a need for significant investment in bridge infrastructure at the Adversane (Kingswood) new settlement. However, overall there is confidence that the housing requirement can be delivered and, more specifically, the Council can maintain a five year housing land supply (as measured against the housing requirement), given: A) the supply 'headroom' over the housing requirement over the early years of the plan period (see Figure 2.1); and B) the potential to boost supply through a new Local Plan. Maintaining a five year housing land supply (also ensuring a score of 75% or higher on the annual Housing Delivery Test) is important from a perspective of avoiding 'evidenced unmet need' (Policy S5(1)(J) in the 2026 NPPF).

2.1.2. With regards to the current Further Main Modifications, none directly have a bearing on the achievement of housing objectives, however several are of note.

2.1.3. Firstly, a table is proposed to be added to the plan that sets out the stepped housing requirement and the proportion of the requirement that provides for unmet needs arising from Crawley, Adur and Worthing. However, this is a consequential change that is a reflection of the approach previously consulted on, as opposed to a substantive proposed change at this stage in the process. The table is shown below as Table 2.1.

2.1.4. Secondly, there are a range of Further Main Modifications that deal with policy requirements that could feasibly lead to a degree of burden on developers. However, there is no reason to conclude that the outcome will be any significant implications for development viability or deliverability, such that there could be a need to compromise on wider objectives or such that there is a risk of timely delivery of sites being impacted.

2.1.5. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

***Figure 2.1**: The housing supply/requirement trajectory*

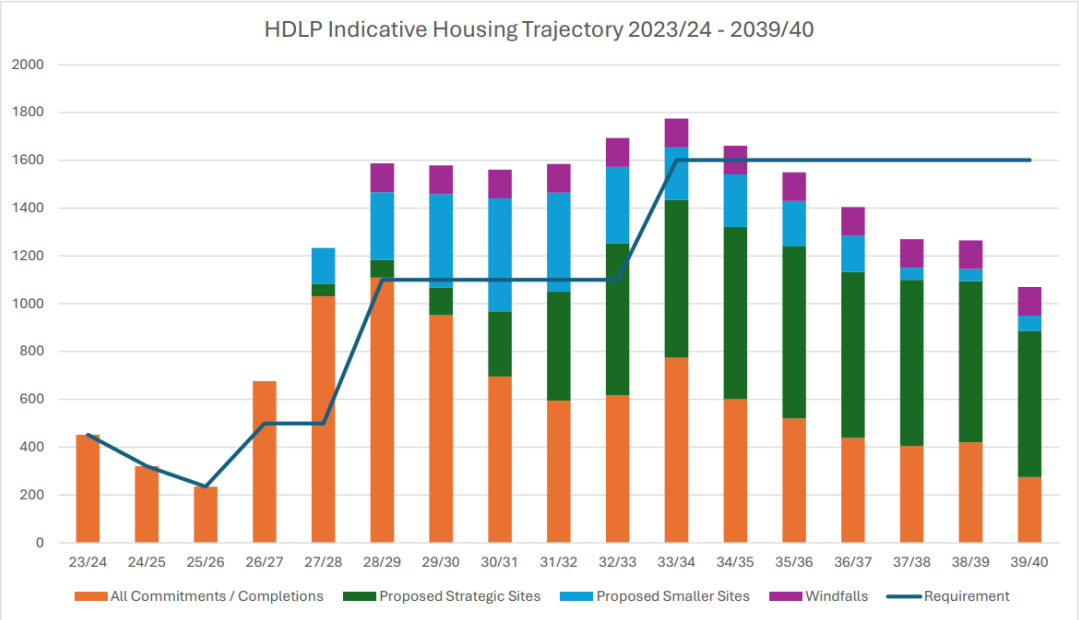


***Table 2.1**: The stepped housing requirement and its apportionment*

Plan Year	Horsham Need	Crawley Need	Adur Need	Worthing Need	Stepped Requirement
2023/24	340	91	8	13	**452**
2024/25	241	64	6	9	**320**
2025/26	177	47	4	7	**235**
2026/27 – 2027/28	375	100	9	15	**499**
2028/29 – 2032/33	827	221	20	32	**1,100**
2033/34 – 2039/40	1,204	321	29	47	**1,601**

3. Access to services and facilities

3.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' positive effect, with a key consideration being that: *"Adversane will deliver three schools including a secondary school, and two other secondary schools are set to be delivered by submission allocations, but access to community infrastructure (with capacity) at villages is a matter for ongoing scrutiny."*

3.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters including:

- Spatial Strategy – *"The plan's spatial strategy… distributes development in a logical way to meet the plan's housing requirement. Taking into account existing large commitments, it concentrates the greatest amounts development in locations with good access to services and facilities, including sites close to Crawley, and smaller amounts of development at the lower tier towns. To help to meet the raised housing requirement, the main modifications seek to create a new freestanding settlement of sufficient size to support its own range of services and facilities. The plan addresses understandable concerns about the need for schools, health and other social facilities by locating most development near to facilities or public transport routes and by including policies that require land and contributions towards the provision or improvement of these facilities where appropriate, thus helping to limit the need to travel… This is an appropriate way to address housing and community needs, movement impacts and climate change… the spatial strategy also makes appropriate use of the existing road network and existing public transport services."*
- West of Ifield – *"There is no doubt that the allocation at Land West of Ifield (Strategic Policy HA2) would change the character of this area, which is largely green and is used for golf and informal recreation. This must be weighed against the advantages of delivering a large amount of much-needed housing and affordable housing, and a range of community facilities, in a highly sustainable location next to Crawley."*
- Adversane – *"The proposed free standing settlement… (Strategic Policy HA(NP1) (MM227) would be large enough to support a range of facilities including primary schools and a secondary school and improved public transport."*
- Billingshurst and Southwater – *"Land East of Billingshurst and Land North West of Southwater (Strategic Policy HA3) are in highly sustainable locations that would make good use of, and support, existing facilities..."*
- Small towns and villages – *"... All the chosen site allocations are logical village extensions with relatively limited impacts and are appropriately located to take advantage of and support facilities in these villages."*

3.1.3. With regards to the current Further Main Modifications:

- Strategic Policy 3 (Settlement Expansion) – new wording specifies that expansion should be *"well related to the settlement boundary and to transport facilities."*
- Strategic Policy 23 (Infrastructure Provision) – considerable new supporting text is added to explain the approach that the Council will take to working proactively with infrastructure providers and other key partner organisations such as the County Council, the NHS and the Environment Agency at the planning application stage.
- Strategic Policy 28 (Community Facilities, Leisure and Recreation) – firstly, there are some proposed clarifications regarding when there is a need for marketing of a facility prior to its loss, with a specific proposal being that marketing is not required where the proposal is to replace a facility. Secondly, policy wording is proposed for deletion that set out specific factors that must be taken into account when reaching a conclusion that continued use of a site as a community facility is no longer feasible. Thirdly, new policy wording is proposed setting out that loss of open space must be preceded by "*an assessment… which clearly shows any open space to be lost is surplus to requirements."*
- HA2 (West of Ifield) – the requirement is now for one 3-form entry primary school instead of two 2-form entry schools, and the requirement is for a 6-form entry secondary school rather than an 8-form entry school. These changes reflect the latest advice from the County Council, accounting for latest data.
- HA4 (East of Billingshurst) – a criterion is amended to state that nursery provision should preferably be combined with or located adjacent to the primary school.
- HA(NP1) (Adversane) – the requirement is now for a 3-form entry primary school, rather than a 2-form entry school capable of being expanded to 3-form entry. However, the proposal is to delete the previous requirement for the school to be delivered at an early phase of development.
- HA9 (Henfield) – a policy criterion is amended to elaborate on what is expected in terms of active travel links. Specifically, the requirement is for links *"across the A281 (east to west) to provide safe access to key community facilities, including the school."*

3.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

4. Inclusive communities

4.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect, with a key consideration being that: *"Given the scale of growth across the new proposed allocations there is a need to flag a risk of community concerns ahead of consultation and subsequent work to consider and action responses. The context is also the urgent need for an up-to-date Local Plan."*

4.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters including:

- Spatial strategy – the Inspector's key quote in respect of the spatial strategy is presented above in Section 3, but the key point to note here is that the Inspector states that: *"This is an appropriate way to address housing and community needs...."*
- Small towns and villages – *"In some of the lower tier small towns and larger villages, the cumulative amount of new development would be relatively large in proportion to the existing built up area. In addition, certain of the proposed site allocations would go beyond or contradict the provisions of neighbourhood plans. However, circumstances have changed since the neighbourhood plans were made. The local plan must identify sufficient land to meet the District's housing requirement to 2040 and the proposed allocations would make an important contribution in this regard. Provided schemes are well designed, a matter that can be addressed at the planning application stage, there*

is no reason why they should harm settlement character. All the chosen site allocations are logical village extensions with relatively limited impacts and are appropriately located to take advantage of and support facilities in these villages.

- Development management policies – *"Ultimately the success of the site allocations and the quality of their delivery will lie in their detailed design, the appropriate provision of social and community facilities and greenspace, and the careful management of their relationship with wildlife, trees, heritage assets, transport and so on. The policies in the plan as a whole, and the policies for the individual site allocations, are designed to ensure that these important issues will be fully addressed at the time of each planning application, when there will be a further rigorous process of scrutiny as well as full public consultation."*

4.1.3. With regards to the current Further Proposed Main Modifications:

- Chapter 7 (Development Quality, Design and Heritage) – new supporting text states: *"Development should therefore include spaces that are safe, secure, inclusive and accessible for all ages and abilities, including groups such as women and girls; and which facilitate and encourage social interactions, play and healthy lifestyles."*
- Strategic Policy 23 (Infrastructure Provision) – new supporting text (discussed above).
- HA4 (Land East of Billingshurst) – there is extensive new text dealing with the matter of delivering a new footbridge over the railway line, which is an important element of the proposed scheme but which will prove costly such that there is a need to confirm expectations including phasing. Also, new text specifies where a site for 5 Gypsy and Traveller pitches should be delivered within development site. This is supported as it provides additional confidence that the pitches will be delivered as anticipated.

4.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

5. Crime

5.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a neutral effect, and did not flag any significant issues or opportunities.

5.1.2. With regards to the current Further Main Modifications, none have any notable direct or indirect implications for the achievement of crime-related objectives.

5.1.3. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

6. Health & wellbeing

6.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' positive effect, with a key consideration being that: *"There is a need for ongoing scrutiny of the optimal locations for delivering new GP surgery capacity."*

6.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters. Whilst the letter does not specifically discuss matters relating to access to health facilities at villages that are assigned growth, the Letter does state in respect of growth at villages: *"All the chosen site allocations… are appropriately located to take advantage of and support facilities in these villages."* Also, in respect of the spatial strategy in general, the letter states: *"The plan addresses understandable concerns about the need for schools, health and other social facilities by locating most development near to facilities or public transport routes and by including policies that require land and contributions towards the provision or improvement of these facilities where appropriate…"*

6.1.3. With regards to the current Further Main Modifications, the key point to note is the extensive new supporting text in respect of Strategic Policy 23 (Infrastructure Provision), as discussed above in Section 3.

6.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

7. Biodiversity

7.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect, with a key consideration being that: *"Constraints are widespread, but there is good potential to avoid and mitigate impacts (site specific policy warrants ongoing scrutiny) and the context is that without an up-to-date Local Plan development will continue under the presumption in favour of sustainable development."* Also, the previous SAR Addendum suggested that *"a more targeted approach might be taken through site-specific policies aimed at ensuring confidence that green/blue infrastructure will be delivered within site boundaries aimed at avoiding biodiversity impacts and delivering well-targeted enhancements."*

7.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters. Several of the quotes presented above are relevant, and a further quote is as follows:

"The allocated sites are almost all on greenfield land because there is very limited scope to use brownfield land in the District to meet housing need. But the plan contains strong policies to avoid substantial harm to heritage assets, designated and valued landscapes, habitats and protected species. Those policies ensure that appropriate studies into, for example, landscape, heritage, ecology or habitats, are carried out at the planning application stage. The plan's policies also require masterplans to be produced for the larger sites, in which these important factors would be considered in the round."

7.1.3. With regards to the current Further Main Modifications:

- Strategic Policy 17 (Green Infrastructure and Biodiversity) – there is additional policy wording relating to internationally designated sites: *"New development for which it is not possible to conclude no adverse effect on the integrity of [the Mens SAC and other internationally designated sites] either alone or in combination with other plans or projects, taking into account any proposed mitigation measures, will not be permitted. Where necessary, such as in response to monitoring and updated evidence, mitigation measures will be required and secured through conditions and/or planning obligations attached to planning permissions."*

  Also, in respect of the Mens SAC specifically, new supporting text states: "*Where development would have likely significant effects on The Mens SAC air quality, mitigation measures will be required to ensure that it will have no adverse effect on the integrity of the area. In designing mitigation measures, regard should be had to…"*

- HA9 (Henfield) – new policy wording seeks to clarify the approach to buffering woodland, with the proposal being to make clear that it is only ancient woodland that needs to be buffered, and that within the buffer zone the following is appropriate: *"vehicular and pedestrian access on existing farm routes where it is demonstrated there will be no loss or deterioration of ancient woodland."*

- HA10 (Horsham) – specifically in respect of HOR3 (Land South of New House Farm; 120 homes), the proposal is to delete the previous requirement that there should be a buffer to the woodland adjacent to the site. Rather the new requirement is that any planning application must be: *"supported by a preliminary ecological appraisal to assess whether proposals will result in any direct or indirect impacts on the Priority Habitat Inventory woodland (The Birches) to the east of the allocation. Where impacts are identified, proposals will need to demonstrate compliance with Strategic Policy 17: Green Infrastructure and Biodiversity."*

- HA(NP1) (Adversane) – there is a new requirement for a wintering bird survey.
- HA4 (Land East of Billingshurst) – the proposal is to remove reference to there being an opportunity to enhance the Local Wildlife Site that is within the site (as the site is not within the control of the site promoter). However, proposed policy wording specifies that the LWS should be appropriately buffered. Also, there are new policy requirements in respect of mitigating impacts on the Mens SAC, including specifying requirements for electric vehicle charging points and bike share infrastructure.

7.1.4. In conclusion, the Further Main Modifications generate a minor degree of tension with biodiversity objectives (because some site-specific policy requirements are proposed to be made less stringent), but do not generate a significant effect. The previous conclusion on reached on the Local Plan still holds true.

8. Landscape

8.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect. However, it explained: *"… this is somewhat marginal given limited sensitivities across the suite of new proposed allocations and recalling the baseline scenario is one whereby growth continues..."*

8.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters. Several of the quotes presented above are relevant, and further quotes are as follows:

- West of Ifield – *"There is no doubt that the allocation at Land West of Ifield (Strategic Policy HA2) would change the character of this area, which is largely green and is used for golf and informal recreation. This must be weighed against the advantages of delivering a large amount of much-needed housing and affordable housing, and a range of community facilities, in a highly sustainable location next to Crawley. I consider that the plan strikes the right balance. The golf course would not be retained, but the site is large enough to provide for significant amounts of open space and recreation. Concerns about heritage and green infrastructure are capable of being addressed adequately through masterplanning and planning applications…"*
- Kilnwood Vale (Strategic Policy HA(NP3), MM235) – *"is a logical extension of existing development near Crawley and its design would take into account a landscape and visual impact assessment owing to its proximity to the National Landscape."*

8.1.3. With regards to the current Further Main Modifications:

- Strategic Policy 19 (Development Quality) – a broad reference to retaining 'landscape belts, trees, hedgerows and watercourses' is proposed to be amended to ensure a clearer focus as follows: *"Retains existing good quality landscape belts, trees, hedgerows and watercourses where they contribute to the character of the landscape."*
- HA(NP3) (Kilnwood Vale) – the policy requirement in respect of landscape is expanded such that it is now proposed to read: *"The layout, density, building heights and any mitigation of landscape impacts have been informed by a landscape-led masterplan and a Landscape and Visual Impact Assessment, responding to the site's proximity to the High Weald National Landscape."*

8.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

9. Historic environment

9.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect. However, it explained: *"… this is somewhat marginal given limited sensitivities across the suite of new proposed allocations and recalling the baseline scenario is one whereby growth continues..."*

9.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters. Several of the quotes presented above are relevant, including quotes presented in respect of: Adversane in Section 3; development management policies in Section 4; environmental impacts in general in Section 7; and West of Ifield in Section 8.

9.1.3. With regards to the current Further Main Modifications, none have any notable direct or indirect implications for the achievement of historic environment objectives.

9.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

10. Soil quality

10.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect. This related to loss of agricultural land, with the context being: "*There is significant higher quality agricultural land in the District but also areas of lower quality land, and the situation is similar across the… sub-region."*

10.1.2. With regards to the current Further Main Modifications, none have any notable direct or indirect implications for the achievement of soil quality objectives.

10.1.3. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

11. Natural resources

11.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a neutral effect, and did not flag any significant issues or opportunities.

11.1.2. With regards to the current Further Main Modifications, notable changes relate to reuse of existing buildings and minimising waste as part of the construction process:

- Supporting text to Strategic Policy 6 (Climate change) – amended to read: *"Existing buildings contain embodied carbon (i.e. carbon that was emitted during the construction process) therefore, proposals should take advantage of opportunities to reuse existing structures and materials."*
- Strategic Policy 8 (Sustainable design and construction) – one of the policy criteria (as previously amended) is amended to read*: "Take advantage of opportunities to reuse existing structures and materials, including the reuse of non-contaminated excavated soil and hardcore within the site."*

11.1.3. Overall, these changes do not give rise to a significant effect, although it can be noted that a previous requirements to "demonstrate how the on-site embedded carbon has been retained" and "minimise" construction waste etc are proposed for deletion.

11.1.4. In conclusion, the Further Main Modifications generate a minor degree of tension with 'natural resources' objectives, but do not generate a significant effect and the previous conclusion on reached on the Local Plan still holds true.

12. Water resources

12.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect, with a key consideration being that: *"There are inherent uncertainties in respect of both water supply and wastewater treatment capacity and there is a need to ensure the associated delivery risk factors in."*

12.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters. Several of the quotes presented above are relevant, and a further quote is as follows:

"Whilst I have noted concerns about the supply of utilities, it is for the statutory undertakers to work with the Council and developers and to organise their programmes and capital investment to support the future planning of the District. The Council have engaged adequately with service providers over the course of plan preparation and during the site selection process. Whilst phasing might be necessary on some sites, I have not read or heard anything in evidence to suggest that the spatial strategy or any of its components is unsound because of a fundamental inability to provide services and utilities."

12.1.3. With regards to the current Further Main Modifications, the key point to note is the extensive new supporting text in respect of Strategic Policy 23 (Infrastructure Provision), as discussed above in Section 3.

12.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

13. Flooding

13.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' negative effect. However, it explained: *"This is a precautionary conclusion ahead of consultation with the Environment Agency."*

13.1.2. The Environment Agency was then consulted on the Main Modifications and the Council's Strategic Flood Risk Assessment (SFRA), and then matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter states that Adversane: *"would have limited landscape impact and low levels of flood risk."* Also, more generally it discusses the importance of implementing development management policies at the planning application stage, and also the importance of masterplanning strategic sites, as discussed above.

13.1.3. With regards to the current Further Main Modifications, the only change of noted is in respect of Strategic Policy 10 (Flooding). Specifically, the proposal is to amend a criterion (as previously amended) to read: *"Development should consider the potential for site specific flood and hydraulic modelling to inform the developability, design and layout of the site."* This change does not have any significant implications for the ability to successfully bring sites forward whilst accounting for flood risk.

13.1.4. In conclusion, the Further Main Modifications do not generate a significant effect. However, in light of the latest evidence base – in particular evidence generated through consultation with the Environment Agency – it is now considered appropriate to reach a more positive conclusion for the Local Plan as a whole, specifically a neutral effect.

14. Transport

14.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a neutral effect on balance, having accounted for a range of positives and negatives. The report explained: *"There is support for the proposed approach in some respects but some of the proposed allocations potentially reflect a need to compromise on transport objectives / vision-led transport planning principles."*

14.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters, including:

- Spatial strategy – the Inspector's key quote in respect of the spatial strategy is presented above in Section 2, but the key point to note here is that the Inspector states that: *"This is an appropriate way to address… movement impacts and climate change… the spatial strategy also makes appropriate use of the existing road network and existing public transport services."*
- Traffic – *"… Road congestion at peak times including school traffic is a fact of life but I am satisfied from the evidence that, accounting for the cumulative effects of development, the road network would operate effectively, subject to the junction mitigation measures and active travel interventions described in the plan and the main modifications."*
- Billingshurst and Southwater – *"Land East of Billingshurst and Land North West of Southwater (Strategic Policy HA3) are in highly sustainable locations that would make good use of, and support, existing facilities, and in the case of Billingshurst, would be very close to a railway station. As regards the footbridge infrastructure required for Land East of Billingshurst, my conclusions are similar to those for Adversane [i.e. there is a degree of delivery uncertainty, but no clear basis to conclude non-deliverability]…"*
- West of Ifield – *"It would be unrealistic for a development of this scale to deliver the whole of the proposed western multi-modal relief road, but the allocation would deliver the central portion. A number of junctions within Crawley are congested, but the transport assessment (HDCJB15b) shows that for the most part, the allocation would not make a significant difference to them. The site would have the positive attribute of being well placed for Crawley and the policy promotes bus and active travel connections into the town. MM191 increases the anticipated number of homes delivered in the plan period from at least 1,600 to 2,500..."*

14.1.3. With regards to the current Further Proposed Main Modifications:

- Strategic Policy 3 (Settlement Expansion) – new wording specifying that expansion should be *"well related to the settlement boundary and to transport facilities."*
- Strategic Policy 23 (Infrastructure Provision) – new supporting text, as discussed.
- Strategic Policy 24 (Sustainable Transport) – the following new supporting text is strongly supported: *"Where the LCWIP networks, both within and outside the District, provide potential links to a development, the applicant should contribute to delivering or improving that part of the network."*
- HA2 (West of Ifield) – there is a new policy requirement as follows: *"Proportional contributions will be sought towards off-site bus, rail station and active travel infrastructure, including in Crawley Borough, as agreed through the Travel Plan."*
- HA(NP1) (Adversane) – new policy wording sets out that priorities for walking and cycling infrastructure include: *"connections to Brinsbury College, Billingshurst train station and along the A29 corridor towards Pulborough."*
- HA(NP1) (Adversane) – policy requirements are adjusted in respect of the A29/A283 mini roundabouts at Pulborough, including with an important new requirement for measures to include a focus on enhancing active travel infrastructure.
- HA(NP1) (Adversane) – the following new requirement is proposed: *"Proportionate contributions towards enhanced public transport and active travel facilities to reduce impacts through the Five Oaks Road/A264 Western arm of the A264/A281 South of Broadbridge Heath Roundabout."*
- HA9 (Henfield) – a policy criterion is amended to elaborate on what is expected in terms of active travel links. Specifically, the requirement is for links *"across the A281 (east to west) to provide safe access to key community facilities, including the school."*
- HA4 (Land East of Billingshurst) – rather than a requirement for a comprehensive transport strategy covering the two parts of the site (north and south of the railway), the new requirement is as follows:

"The proposals must be accompanied by a comprehensive transport strategy, or where demonstrated not to be prejudicial to the comprehensive masterplanning framework of the whole site allocation, two coordinated transport strategies split north and south of the railway that provide a suitably comprehensive approach…"

14.1.4. In conclusion, the Further Main Modifications are broadly supported in terms of transport objectives, but do not generate a significant effect, and the previous conclusion reached on the Local Plan still holds true.

15. Air pollution

15.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a neutral effect on balance, having accounted for a range of positives and negatives. The report explained: *"New allocations are proposed at Storrington, where there is a need to balance constraints to growth with the strategic argument in favour of growth given good links to the south coast towns."*

15.1.2. Matters were then explored through the examination hearings in October 2026, and then whilst the 30th October Post Hearings Letter does not explicitly discuss air quality, it does discuss matters relating to transport and road traffic, as discussed above.

15.1.3. With regards to the current Further Main Modifications, none have direct implications for air quality objectives. However, as discussed, there is support for the Furher Main Modifications in terms of transport objectives, such that there could be indirect benefits in terms of air pollution.

15.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

16. Climate change

16.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a neutral effect on balance, having accounted for a range of positives and negatives. The report explained: *"The proposed strategy involves a strong focus of growth at sites with strong viability credentials that should be well placed to deliver net zero carbon development, but there is much uncertainty and it is difficult to conclude that the spatial strategy reflects a level of ambition that is in line with that required to ensure a district-wide decarbonisation trajectory in line with commitments."*

16.1.2. Matters were then explored through the examination hearings in October 2026, and then the 30th October Post Hearings Letter discusses a range of key matters. Several of the quotes presented above are relevant, in particular the clear conclusion that the spatial strategy *"is an appropriate way to address… movement impacts and climate change."*

16.1.3. With regards to the current Further Main Modifications, the only point to note is the proposal to adjust requirements in respect of reuse of buildings and minimisation of construction waste aimed at minimising embodied carbon emissions, as discussed above under the natural resources topic heading.

16.1.4. In conclusion, the Further Main Modifications generate a minor degree of tension with climate change mitigation objectives, but do not generate a significant effect, and the previous conclusion on reached on the Local Plan still holds true.

17. Economic growth and employment

17.1.1. The previous SAR Addendum (July 2026) concluded that the Local Plan as modified will have a 'moderate or uncertain' positive effect. The report explained: *"As well as providing for employment land needs the proposed modifications reflect a proactive approach to planning for the ongoing success of existing employment areas."*

17.1.2. Matters were then explored through the examination hearings in October 2026, and then whilst the 30th October Post Hearings Letter does not specifically discuss matters relating to employment land or the economy, nor does it flag any concerns. The delivery challenge at Adversane is of note, in that delivery challenges can feasibly lead to pressure to deliver housing in place of employment floorspace; however, there is no reason to suggest a particular concern.

17.1.3. With regards to the current Further Main Modifications, none have any notable direct or indirect implications for economic growth and/or employment objectives.

17.1.4. In conclusion, the Further Main Modifications do not generate a significant effect and the previous conclusion reached on the Local Plan still holds true.

18. Conclusion and next steps

18.1.1. The previous SAR Addendum (July 2026) concluded as follows:

"Having accounted for the proposed approach to boosting supply (and, in turn, the housing requirement), the plan performs very well in terms of housing objectives, and also performs well in terms of certain other socio-economic objectives, for example because proposed allocations would deliver three new secondary schools.

The appraisal does flag a range environmental concerns, but in some cases this is with some uncertainty ahead of consultation and Examination in Public, plus there is uncertainty given that: A) the baseline situation is one whereby growth continues at pace under the presumption in favour of sustainable development; and B) providing for unmet need through through the Local Plan would relieve pressure for growth elsewhere.

There are also some significant proposed adjustments to DM policies, in light of the latest understanding of development viability, which must factor-in strongly in order to ensure sites deliver as expected. In particular, the proposal is to reduce the required level of affordable housing from a headline figure of 45% to 35%, and there are also proposed to be less stringent requirements in respect of net zero development (but it can be argued that this is necessary in light of recent or emerging Government policy).

Finally, a key aspect of the proposed Main Mods is the suite of site specific policies prepared for the new proposed allocations. Again there is a need to strike a balance within viability parameters, and overall limited concerns are raised under the various topic headings, but site specific policies warrant further scrutiny through the consultation and subsequent Examination in Public. This is a view to confidence that sites will deliver on time and more broadly as expected, e.g. with infrastructure delivered alongside homes and with steps taken to address onsite and adjacent constraints."

18.1.2. At the current stage, the Further Main Modifications themselves have very limited implications for sustainablity objectives, but it is appropriate to now reach a more favourable conclusion in respect of the Local Plan as a whole (as modified) under the 'Flood risk' topic heading, because the Environment Agency has now been consulted. A small number of the Further Main Modifications give rise to a degree of tension with certain sustainability objectives, most notably in respect of biodiversity and climate change mitigation, but concerns are limited. There is support for additional policy wording in respect of site-specific transport infrastructure requirements. Also, there is generally support for adjustments to policy wording that provide further confidence that sites can viably be delivered in accordance with the Local Plan.