

Horsham Local Plan Sustainability Appraisal (SA)

SA Report Addendum

July 2026

Quality information

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Non-technical summary

This SA Report Addendum aims to present an appraisal not only of the proposed Main Modifications to the Horsham Local Plan that are currently published for consultation, but also 'reasonable alternatives', specifically in the form of reasonable alternative 'growth scenarios'.¹

Reasonable alternative (RA) growth scenarios are considered first in Section 2, with the aim of explaining a story over time, namely: 1) work was completed to define growth scenarios (Section 2.2); 2) the growth scenarios were subjected to appraisal (Section 2.3); and then 3) the Council decided the preferred approach for consultation in light of the appraisal (Section 2.4). Section 3 of the report then presents an appraisal of the proposed Main Modifications as a whole.

Focusing on the RA growth scenarios (Section 2), these are presented below in Table A. Scenario 1 is the proposed approach to boosting housing land supply that is currently the focus of consultation, and then Scenarios 2 to 6 are alternative approaches considered 'reasonable' in that they warrant being a focus of appraisal and consultation alongside Scenario 1.

Scenario 1 involves: A) a baseline housing supply that includes supply from allocations in the submission version of the Local Plan (as modified); B) a proposed new settlement at Adversane (south of Billingshurst), which would deliver 1,425 homes in the plan period (to 2040) and around 3,200 homes in total; and C) additional supply of 2,424 homes from a suite or proposed new non-strategic allocations. The other scenarios are then as follows:

- Scenario 2 – as per Scenario 1 but replace Adversane with a new settlement at Buck Barn.
- Scenario 3 – as per Scenario 1 but add additional non-strategic sites.
- Scenario 4 – as per Scenario 2 but add additional non-strategic sites.
- Scenario 5 – as per Scenario 2 but add a strategic site west of Billingshurst.
- Scenario 6 – as per Scenario 1 but add Buck Barn.

Table A: The RA growth scenarios (constants greyed-out)

Scenario	1 Adversane	2 Buck Barn	3 Adversane Non-strat.	4 Buck Barn Non-strat.	5 Buck Barn W. B'hurst	6 Adversane Buck Barn
Completions & commitments	10,618	10,618	10,618	10,618	10,618	10,618
Windfall	1,440	1,440	1,440	1,440	1,440	1,440
Submission allocations	5,018	5,018	5,018	5,018	5,018	5,018
Adversane	1,425	0	1,425			1,425
Buck Barn	0	1,500		1,500	1,500	1,500
West of Billingshurst	0	0	0		1,000	
New non-strategic sites	2,414	2,414	2,814	2,814	2,414	2,414
Total homes	20,915	20,990	21,315	21,390	21,990	22,415
% above LHN (14,071)	49%	49%	51%	52%	56%	59%

¹ The SA process is understood from the SEA Regulations (2004) and the key expectation, as understood from the Regulations, is that a draft plan should be published for consultation alongside a report that appraises "the plan and reasonable alternatives".

With regards to the final row in Table A, it can be noted that under Scenario 1 the total housing land supply over the plan period of 20,915 homes is 49% higher than local housing need (LHN), which is 14,071 homes as understood from the Government's standard method. In turn, under Scenario 1 the housing requirement, which is the number of homes that the Council commits to delivering, would be set significantly above LHN. Specifically, the proposal under Scenario 1 is to set the housing requirement at 18,712 homes such that provision is made for 4,641 homes unmet need from elsewhere (18,712 - 14,071). More specifically, the plan would provide for half of Crawley's unmet need plus a modest proportion of the unmet need arising from the south coast towns. Finally, with regards to the difference between the identified supply (20,915 homes) and the proposed housing requirement (18,712 homes), this is with a view to ensuring a robust supply 'headroom' as a contingency for unforeseen delivery issues. It is very important that the housing requirement is delivered in practice (specifically, there is a need to maintain a rolling 'five year housing land supply') so as to avoid the presumption in favour of sustainable development. In particular, a robust headroom is crucially important over the early years of the plan period, recognising that there will be the potential to boost supply through a new local plan in due course.

With regards to the growth scenarios appraisal presented in Section 2.3, this essentially aims to communicate the pros and cons of the six scenarios, and does not aim to reach a conclusion on which scenario performs best overall. The appraisal serves to highlight Scenario 1 (the emerging proposed approach), Scenario 2 (which sees Adversane replaced with Buck Barn) and Scenario 6 (the emerging proposed approach plus Buck Barn) as *potentially* performing well overall, but reaching a definitive conclusion involves assigning weight to each of the pros and cons, which the appraisal does not seek to do. With regards to Scenario 5, which sees support for Buck Barn alongside strategic growth to the West of Billingshurst, the appraisal finds there to be limited case to be made for this approach in the context of the current Local Plan, but moving forward ongoing consideration might be given to exploring options for strategic growth to the west of Billingshurst (acknowledging that Billingshurst has seen significant growth over recent years and is set to see high growth over the plan period, and there are infrastructure capacity concerns). With regards to Scenarios 3 and 4, there is a strategic case for further boosting supply from non-strategic sites (including with a view to minimising delivery risk / ensuring the housing requirement is delivered), but it is a challenge to identify specific further non-strategic sites for potential allocation, given the constraints to growth that exist across the various settlements in the District.

Section 2.4 presents HDC officers' response to the appraisal, which amounts to an explanation of why Scenario 1 is 'justified', meaning that it is appropriate strategy, taking into account the reasonable alternatives. In short, the Council favours Adversane over Buck Barn on balance, and does not favour further boosting supply from additional non-strategic allocations.

With regards to the appraisal of the proposed Main Mods as a whole (Section 3), this concludes:

Having accounted for the proposed approach to boosting supply / 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 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 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, 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.

1. Introduction

- 1.1.1. This Sustainability Appraisal (SA) Report Addendum published as part of the SA process for the emerging Horsham Local Plan.
- 1.1.2. The Horsham Local Plan aims to establish a strategy for growth and change across the District up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. The SA Report Addendum is published alongside proposed Main Modifications (Main Mods) to the version of the Local Plan previously submitted in July 2024.
- 1.1.4. The aim is to present an appraisal of the proposed Main Mods alongside 'reasonable alternatives' order to inform representations and subsequent plan finalisation.
- 1.1.5. This SA Report Addendum is presented across three sections:
 - Part 1 – discusses work to explore **reasonable alternatives**.
 - Part 2 – presents an appraisal of the current **Main Mods**.
 - Part 3 – discusses **next steps**.

1.2. Background

- 1.2.1. The Inspector overseeing the Horsham Local Plan Examination in Public (EiP) wrote to the Council on 5th May 2026 setting out, amongst other things:

“The submitted plan falls short of meeting local housing need and does not contain any allowance for unmet need from neighbouring authorities. The Council will therefore need to identify further housing sites for inclusion in the plan in the interests of soundness. A number of sites had previously been identified but were not carried forward into the plan owing to the water neutrality restriction. The Council will critically reassess known sites using an appropriate methodology... and will identify a range of sites of different sizes, some of which will be capable of delivering in the shorter term to help ramp up delivery, whilst others will deliver longer term. I am mindful of the importance the Council, Andrew Griffith MP and others have placed on the importance of delivering timely infrastructure to serve the new sites.”
- 1.2.2. It follows that a key focus of the Main Mods is the allocation of additional sites in order to significantly boost housing land supply to 2040 and, in turn, enable a significant boost to the housing requirement, which is the number of homes that the Council commits to delivering (in the knowledge that under-delivery leads to punitive measures).² In turn, the allocation of additional sites must be a key focus of reasonable alternatives.

2. Reasonable alternatives

2.1. Introduction

- 2.1.1. The legal requirement is to define reasonable alternatives (RAs) accounting for “the objectives and geographical scope of the plan” and there is also a requirement to ensure that the appraisal allows for meaningful conclusions on differential ‘significant effects’.
- 2.1.2. In short, this means a focus on RAs that go to the very heart of the plan, and it can also be noted that the legal requirement to appraise and consult upon on “the plan and reasonable alternatives” suggests a need to essentially consider alternative plans. This all suggests a need to focus on alternative key diagrams, or ‘**growth scenarios**’.

² NPPF para 11 sets out that the presumption in favour of sustainable development (or ‘tilted balance’) applies where a Council cannot demonstrate ‘five year housing land supply’ (5YHLS) of deliverable sites as measured against the housing requirement.

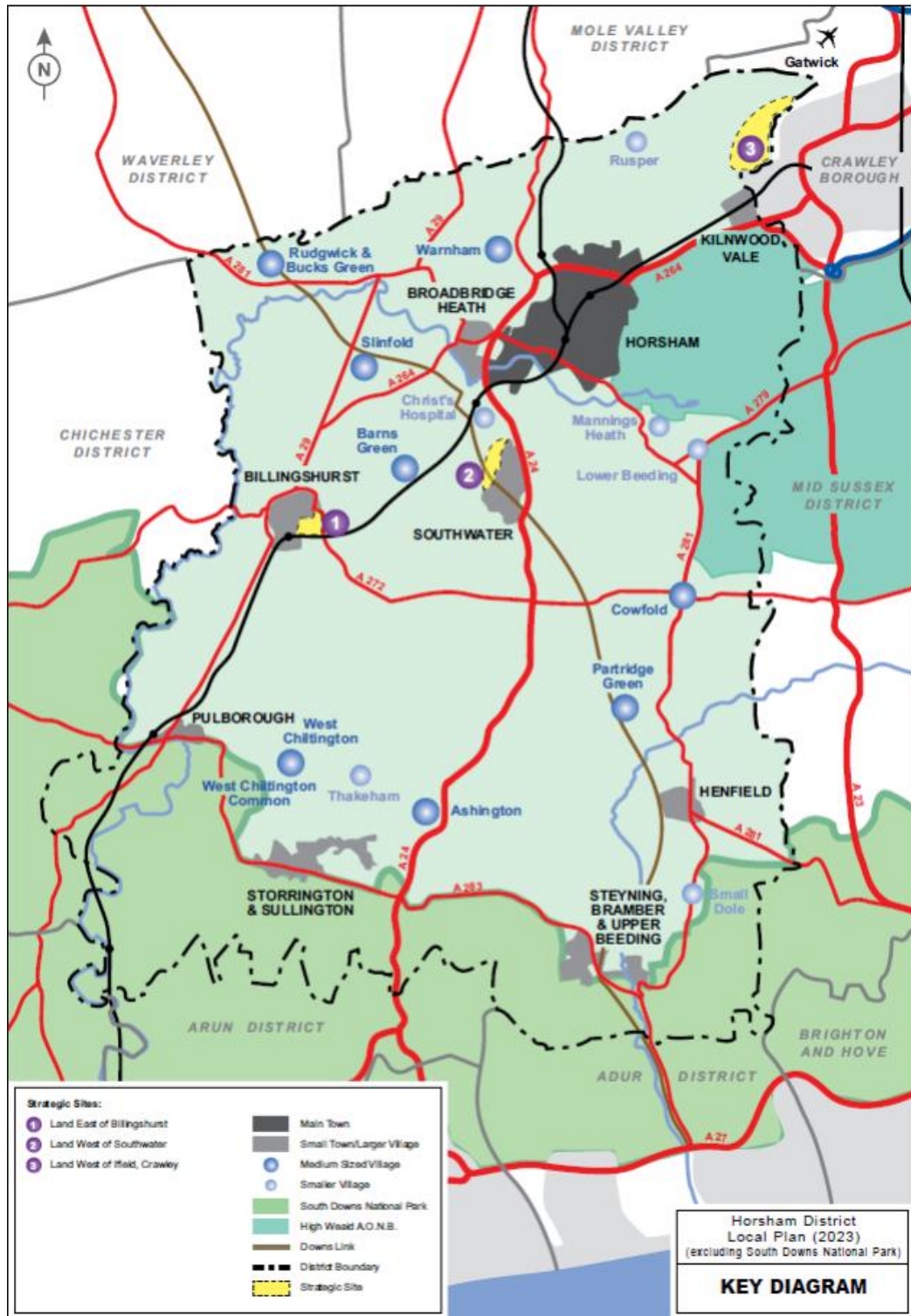
2.2. Defining growth scenarios

- 2.2.1. A key point to note is that the focus is on defining growth scenarios specifically defined as alternative approaches to boosting supply / the housing requirement via new allocations', i.e. such that the existing allocations within the Submission Local Plan can reasonably be assumed as a constant across all RA growth scenarios. That is not to say that existing allocations are a fait accompli, but the Inspector has given a clear direction that a focus of the current Main Mods consultation is on new allocations.
- 2.2.2. In turn, the first step is to establish a 'baseline' of supply from: A) sites that have been completed since the start of the plan period in 2023 ('completions'); B) sites either with planning permission or an allocation in a 'made' neighbourhood plan as of 1st April 2026 ('commitments'); C) a windfall assumption; and D) the submission allocations that do not have planning permission (a number had been permitted by 1st April 2026).
- 2.2.3. Specifically, the baseline supply totals **17,076 homes**, which breaks down as:
- Completions and commitments – 10,618 homes³
 - Windfall – 1,440 homes
 - Submission allocations – 5,018 homes⁴
- 2.2.4. Having established the baseline supply, the next step is to consider broadly how many homes may need to be provided for through new allocations (Main Mods) in order to enable a sufficient 'boost' to the housing requirement (see discussion above).
- 2.2.5. With regards to the housing requirement, *broad strategic* considerations are as follows:
- Local Housing Need (LHN) is 14,071 homes in total over the 17 year plan period, as understood from the Government's standard method. Whilst the Submission Local Plan proposed a requirement set below LHN, at this stage it is clear that any growth scenario involving a housing requirement set below LHN is 'unreasonable'.
 - At this stage it is clear that the housing requirement must be set above LHN such that there is provision for half of Crawley's unmet housing need, namely 3,757 homes.
 - Also, there is a strong case for additionally contributing proportionately to the unmet need from the constrained south coast local authorities, which has been estimated at 2,000 homes *per annum*, although this includes authorities relatively poorly linked to Horsham District (i.e. better linked to neighbouring authorities). The emerging proposed approach is to additionally boost the housing requirement in order to make provision for 884 homes unmet need from the south coast (52 homes per annum); however, there is a need to remain open to a higher figure.
- 2.2.6. On the basis of these bullet points the emerging proposed approach is to set the housing requirement at **18,712 homes** (14,071 + 3,757 + 884).
- 2.2.7. In turn there is a need for *at least* $18,712 - 17,076 =$ **1,636 homes** supply from new allocations in order to enable the housing requirement to be set at 18,712 homes.⁵
- 2.2.8. However, it is acknowledged that there are arguments for higher growth, most notably in respect of unmet need from the south coast, such that there is a need to remain open to higher growth scenarios, subject to consideration of spatial strategy and supply options.
- 2.2.9. Next there is a need to discuss **broad spatial strategy** considerations that must factor-in as part of work to consider new supply options, and context is provided by the Key Diagram from the Submission Local Plan, which is presented below as Figure 2.1.

³ Including three existing strategic committed sites: Kilnwood Vale; Land West of Southwater; and Land North of Horsham.

⁴ Some adjustments are made to site capacities and one allocation for 12 homes at Rusper is proposed to be deleted.

⁵ This is an 'at least' figure because a supply headroom over-and-above the housing requirement can be called for as a contingency for unforeseen delivery issues, i.e. to ensure that the requirement is delivered year-on-year (at least in the early years of the plan period). Specifically, there is a need to ensure that the Council can maintain a rolling five year housing land supply (5YHLS), as measured against the requirement (and accounting for the need to provide for a 5% or 20% 'buffer'), and also pass the annual Housing Delivery Test (HDT), over the early years of the plan period ahead of a new local plan.

Figure 2.1: The Submission Local Plan Key Diagram

2.2.10. Key points to note include:

- The settlement hierarchy – when considering new supply there is a clear case for directing growth broadly in line with the settlement hierarchy, e.g. with a good proportion of growth directed to Horsham and the eight small towns / larger villages. However, there is also scope to depart from the settlement hierarchy, on the basis of planning/sustainability objectives and, in this regard, and immediate point to note is that three of the small towns / larger villages are constrained on account of being located adjacent to the South Downs National Park (also, for two of them, major flood zones associated with the River Adur (Pulborough) and River Arun (Steypning)).

- Strategic growth locations – the Submission Local Plan allocates three strategic sites, which are shown on the Key Diagram, and there is strong support for allocating at least one new strategic site at the current time, i.e. as part of the overall package of sites to deliver a supply boost / enable a boost to the housing requirement. As part of this, a key aim is to direct growth to locations well placed to deliver new and upgraded infrastructure alongside new homes (see the Inspector’s quote above, at para 1.2.1).
- Smaller sites – there is a need to ensure that a good proportion of the new supply comes from smaller sites, particularly in light of the Inspector’s specifically having stated the need for *“a range of sites of different sizes, some of which will be capable of delivering in the shorter term to help ramp up delivery.”* Further considerations are: A) a diverse mix of geographically dispersed smaller greenfield sites also helps to ensure a robust housing supply trajectory, i.e. one whereby there is minimal risk of the Council failing to deliver on its committed housing requirement due to unforeseen delivery issues; B) smaller greenfield sites can tend to benefit from stronger development viability, such that they are well placed to deliver affordable housing alongside delivering on wider policy requirements (including in respect of infrastructure); and C) the NPPF states support for smaller sites including because they are suited to delivery by SME housebuilders and can allow “opportunities for villages to grow and thrive”.
- Broad distribution – the submission Key Diagram shows strategic allocations concentrated in the north of the District at higher order settlements (including Crawley). It is also important to note that the committed North Horsham strategic urban extension is shown as included within the settlement boundary for Horsham.

It remains the case that there is a strategic case for limiting growth in the south of the District (or, more specifically, the south of the plan area, recognising that the far south of the District falls within the South Downs National Park, such that it falls outside of the plan area), because this is a more rural area with limited transport connectivity. However, the latest situation is that there is also a case for boosting the proportion of the total Local Plan supply within the south of the District at locations that are relatively well linked to the south coast towns, given a need to provide for a proportion of south coast unmet need. The Inspector’s letter of May 2026 stated: *“... the plan’s housing requirement will accommodate a realistic and reasonable evidence-based allowance for the south coast’s unmet housing need. The Council are liaising with Mid Sussex who are developing a methodology for assessing what an appropriate allowance might be. This work will enable a final figure for the housing requirement to be produced.”*

- 2.2.11. Having discussed ‘top down’ strategic factors with a bearing on growth scenarios (development needs, wider objectives, broad spatial strategy), next there is a need to give ‘bottom up’ consideration to the various potential sources of new supply that are the building blocks for growth scenarios, and a starting point is **strategic site options**.
- 2.2.12. Aside from the three submission allocations shown in Figure 2.1 (West of Ifield; North West of Southwater; and East of Billingshurst) several other strategic site options were considered in detail over the course of the plan-making / SA process prior to submission but not included in the plan (‘omission sites’).⁶ Specifically, sites were appraised within the SA Reports submitted alongside the Local Plan (examination documents SD03a/b)⁷ and also within Part B of the submitted Site Assessment Report (document H11).
- 2.2.13. As an initial point, one of the previously considered sites now has planning permission (the Horsham Golf and Fitness site located to the north of Southwater; it is discussed further below for context), and two further sites are now not considered to reach the threshold of a ‘strategic site’ (Land West of Kilnwood Vale and the ‘Northern Cluster’ at Ashington; they are discussed further below as non-strategic site options).
- 2.2.14. The following bullet points consider the remaining strategic sites appraised within the previous SA Reports that were ultimately not allocated within the Submission Local Plan:

⁶ Only sites previously considered prior to submission are now being considered for potential additional allocation.

⁷ For context, the SA Report Update that was prepared in house and that was published alongside the Local Plan in 2023 (and then submitted in 2024; examination document SD03a) was an update to an SA Report prepared by LUC in 2021 (examination document SD03b). The two reports examined the same set of 12 strategic site options (see Section 4.3 of SD03a).

- Site SA597: Adversane – is an emerging proposed allocation at the current time (Main Mods) and, in turn, naturally warrants being **progressed** to the growth scenarios. The site is located in the south west of the District, and would relate closely to Billingshurst, delivering a new settlement of ~3,200 homes alongside other uses including linked to adjacent Chichester College, Brinsbury. Billingshurst Station would be ~4km by road, and land would be safeguarded for a possible new station in the future. The site has limited constraints in some regards, and a benefit is that the site promoter is in control of the land and has undertaken extensive work to establish what could be delivered. Indeed, there are a range of ambitious proposals, albeit there is an acknowledgement that proposals are subject to change. A key benefit would be the provision of a new secondary school, which would help to meet an existing shortfall in this part of the District. However, the site is challenging in transport terms, with Horsham ~18km by road and because the B2133 – a rural road feeding onto narrow minor roads – would serve as a link to the south coast. Also, there is a need to carefully consider the effects of a new settlement here in combination with urban extensions to Billingshurst.
- SA716: Buck Barn – would deliver a new settlement of ~3,300 homes to the south of Southwater adjacent to the junction of the A24 and the A272. It clearly warrants being **progressed** to the growth scenarios for testing, including recognising that it was identified as a proposed allocation in 2021 before being removed from the plan prior to publication and submission, including but not necessarily solely on account of the issue of water neutrality issue, which is no longer an issue. Proposals for the site are well-advanced and there is an established vision including 50% greenspace, although the corollary is a less compact built form with implications for walkability and land take. The site benefits from access onto the A24, which is a key route and links to the south coast towns, but there is no rail connectivity. There are also distinct constraints to growth in part of the District, including a high density / network of ancient woodlands and the nearby Knepp Estate. Furthermore, given that a new secondary school is also proposed as part of the North West Southwater submission allocation, the proposed new secondary school would not be well located for meeting unmet educational needs (at least compared to Adversane, given a clearer need in the Billingshurst area).
- Site SA744 (includes SA225/SA668): West of Billingshurst – would deliver an urban extension of ~1,000 homes and on balance warrants being **progressed** to the growth scenarios. The proposal is to deliver significant enhancements to community infrastructure and greenspace, but a clear issue is that the site does not relate well to the settlement edge, in that it is separated by the A29, which is a bypass that opened in 1999, and there is also landscape sensitivity. Furthermore, the site would not deliver a secondary school, and there is a need to caution against an overly high growth strategy for Billingshurst. Finally, whilst this site warrants being progressed to the growth scenarios it is considered reasonable to *rule out* a scenario involving this site's allocation in combination with Adversane (also accounting for committed growth at Billingshurst and the East Billingshurst submission strategic allocation). High growth in the Billingshurst area and along the A29 would be a concern (including noting the Pulborough Conservation Area to the south) and there would be delivery risks.
- Site SA459/SA674/SA846: East of Kingsfold – would deliver a new settlement of ~2,000 homes to the north of Horsham. There is a railway line, and the proposal is to deliver a new station, but there is considerable delivery uncertainty. The railway line also creates severance and would be a source of noise pollution, plus noise pollution relating to Gatwick is a consideration. Also, an issue is proximity to North Horsham, which is a major strategic urban extension where the current proposal is to support an additional 500 homes, including aimed at supporting delivery. Further considerations are: A) there is landscape sensitivity relating to the valley of Boldings Brook; B) as a smaller new settlement there is more limited potential to deliver a mix of uses and infrastructure; C) whilst the proposal is to deliver significant employment land, noting adjacent existing employment land, road connectivity could be a challenge; and D) there is less confidence around deliverability relative to the other strategic site options. In conclusion, this site is **ruled out** on balance, i.e. not progressed to the growth scenarios, because the three sites discussed above are sequentially preferable and there is no strategic case for allocating this site *in addition to* two of these sites (recalling that Adversane and West of Billingshurst are mutually exclusive).

- Site SA414: North East of Henfield – the proposal here (known as ‘Mayfields New Town’) was for a large new settlement to deliver perhaps 7,000 homes alongside significant employment land, but this option is **ruled out** because the site is no longer available within the plan period. There is relative proximity to Brighton, but a key issue is the lack of railway connectivity in this area, and road connectivity is also challenging including as most trips would be to and from the south coast via the historic centre of Henfield. As such, what would be called for is a cross-border scheme in collaboration with Mid Sussex District, which achieves good road connectivity via the A23. However, progressing any such scheme would be a major undertaking, such that allocating a new settlement here is not a realistic option for the current Local Plan (noting the context of impending local government reorganisation and devolution which will significantly change geographies for local plan-making). Finally, there is a need to note the context of other options for additional allocation at Henfield, discussed below.
 - Site SA394: Rookwood– is **ruled out** as it is no longer available given that corporately the Council, as landowner, has resolved to keep its use as a golf course for the foreseeable future. Whilst it was presented as an option at the Reg 18 stage in 2021, it had been ruled out as unavailable by 2023. The site is located on the edge of Horsham, and benefits from being well-contained by the A24, but there are onsite and adjacent constraints relating to Boldings Brook, a large Local Wildlife Site / Local Nature Reserve, numerous ancient trees and woodland priority habitat. As Council-owned land that relates well to Horsham it warrants ongoing consideration; however, it is a challenging site for strategic growth and not an option for the current Local Plan.
- 2.2.15. In summary, in addition to Adversane, which is an emerging proposed allocation at the current time, there is also a need to explore two other strategic site options across the reasonable growth scenarios, namely Buck Barn and West of Billingshurst.
- 2.2.16. The next matter for consideration is then **non-strategic sites** that should feature within the reasonable growth scenarios, and a starting point is the list of non-strategic sites that are emerging proposed ‘new’ allocations at the current time (Main Mods).
- 2.2.17. In total there are 18 such sites and the following bullet points provide an overview, with settlements discussed in descending order of growth quantum proposed:
- Horsham – firstly, the proposal is to support an additional 500 homes within the existing committed North Horsham strategic allocation, to make best use of the site and noting that delivery is now expected to progress at pace (the site has delivered extensive early infrastructure).⁸ Secondly, a site for 120 homes is proposed to the east of Horsham that falls within the High Weald National Landscape (NL), and where there is a pending planning application ([DC/26/0671](#)). Whilst the submission plan does not propose any allocations in the NL, this site has limited landscape sensitivity and there is containment such that there are limited concerns regarding development creep (it previously formed part of a planning application for 473 homes across a wider site). It can deliver early and is in proximity to a proposed business park at North Horsham.
 - Henfield – two adjacent sites to the east of the village are proposed for 450 homes and 191 homes respectively, although the latter site was recently granted planning permission at appeal ([DC/24/1932](#)). There is one submission allocation for 50 homes (there is currently a planning application; [DC/23/0189](#)), and there are also four existing neighbourhood plan allocations, including: A) a site to the east for 25 homes and a significant area of open space / sports pitches that is now proposed to be extended to deliver the new proposed 450 home allocation; and B) a site to the north that recently received a resolution to grant planning permission for 235 homes ([DC/21/2013](#)).
 - Ashington – a cluster of sites to the north west of the village is proposed to deliver 450 homes, having previously been appraised as a strategic site option within the submission SA Reports (‘the Ashington cluster’). Adjacent to the south is a PDL site under construction for 74 homes and a submission allocation for 75 homes (where there is a pending planning application for 74 homes; [DC/25/1327](#)), and then further to the south is site for 152 homes with a resolution to grant permission ([DC/23/0406](#)).

⁸ This 500 homes additional supply is counted within the 10,618 homes completions and commitments figure introduced above.

- Billingshurst – firstly, the proposal is to extend the East of Billingshurst strategic allocation to the south to include a 350 home site separated from the existing East of Billingshurst site by the railway.⁹ The site is well contained and benefits from a single land owner, but there are constraints in the form of adjacent ancient woodland, a stream corridor running through the centre of the site and a network of hedgerows, plus there would only be active travel access directly into Billingshurst (with road access to the east). It is anticipated that a larger East of Billingshurst allocation could deliver a new footbridge over the railway to replace the existing level crossing.

Secondly, the proposal is to allocate a site for 80 homes that is located adjacent to the north of the East of Billingshurst submission allocation. Land adjacent to the north of the site has planning permission for 83 homes ([DC/20/2607](#)) such that the site would round off the settlement edge in combination with East of Billingshurst. The site is subject to limited constraint; however, again it is important to reiterate a need to consider the in-combination effects of growth locations at (and around) Billingshurst in terms of infrastructure capacity, including secondary schools.

- Kilnwood Vale – is a new community at the edge of Crawley, and the proposal now is to deliver an additional 350 homes. This was previously appraised as a strategic site option, and a clear benefit is good links to Crawley, the strategic road network and a rail station. Constraint relating to the adjacent High Weald NL is limited; however, a potential concern is ongoing westward sprawl, and there is also a need to consider proximity to the West of Ifield submission allocation for 3,000 homes.
- Cowfold – the proposal is to allocate a site for 100 homes to the east of the village (there was previously an application for 110 homes; [DC/18/2745](#)), which is in addition to two submission allocations for a total of 70 homes to the north west of the village (one of which now has planning permission for 35 homes; [DC/24/0982](#)), plus there is a permitted site to the north of the village for 35 homes ([DC/22/1815](#)). Cowfold is a rural village but reasonably well linked by road and bus, and the new proposed allocation relates reasonably well to the village and the A272, and is quite well contained.
- Southwater – the proposal is to allocate one site for 100 homes to the south of the settlement, which would somewhat round-off the settlement edge given a recently constructed site for 193 homes to the east and a site with planning permission for 93 homes (up to 100% affordable housing) to the west ([DC/21/2180](#)), although there is a need to consider impacts to an adjacent stream / ancient woodland corridor. There is also the context of a permitted site for 100 homes to the west ([DC/20/0695](#)) and there is a pending planning application for 82 homes to the south ([DC/25/0102](#)). As well as growth to the south of Southwater, the context is: A) recent and ongoing growth to the west, following an allocation in the 2015 Local Plan; B) the Horsham Golf and Fitness site to the north, which was previously appraised as a strategic site option but is now permitted for 800 homes; and C) the submission strategic allocation for 1,000 homes to the north west (there is now a planning application; [DC/26/0366](#)).
- Storrington and Sullington – firstly, a site is proposed for 50 homes to the north of the village that would somewhat round-off the settlement edge, and it can be noted that this site was presented as a potential allocation at the Regulation 18 stage (2020). The site benefits from proximity to the village centre, but there are landscape sensitivities, including noting the River Stour at the southern edge of the site. There was previously a refused planning application for 160 homes ([DC/17/1430](#)). Secondly, a site is proposed for 30 homes to the south of the village and adjacent to the South Downs National Park (SDNP). The site has been the subject of two past applications refused at appeal, and there is now a pending application that is at appeal ([DC/24/1196](#)). Thirdly, the eastern part of an existing allocation to the north of the village is now proposed for an additional 50 homes, because the western part of the submission allocation has permission for 62 homes ([DC/24/2006](#)) whilst the submission allocation envisaged 70 homes in total.¹⁰

⁹ The site has been promoted for 500 homes, but the Site Assessment Report (2026) to account for constraints and ensure a 'landscape led' scheme to include green/blue infrastructure, particularly along the stream corridor. Also, it is noted that the site promoter has stated that they are open to exploring the provision of some Gypsy and Traveller pitches.

¹⁰ This 50 homes additional supply is counted within the 2,464 homes supply from submission allocations (introduced above).

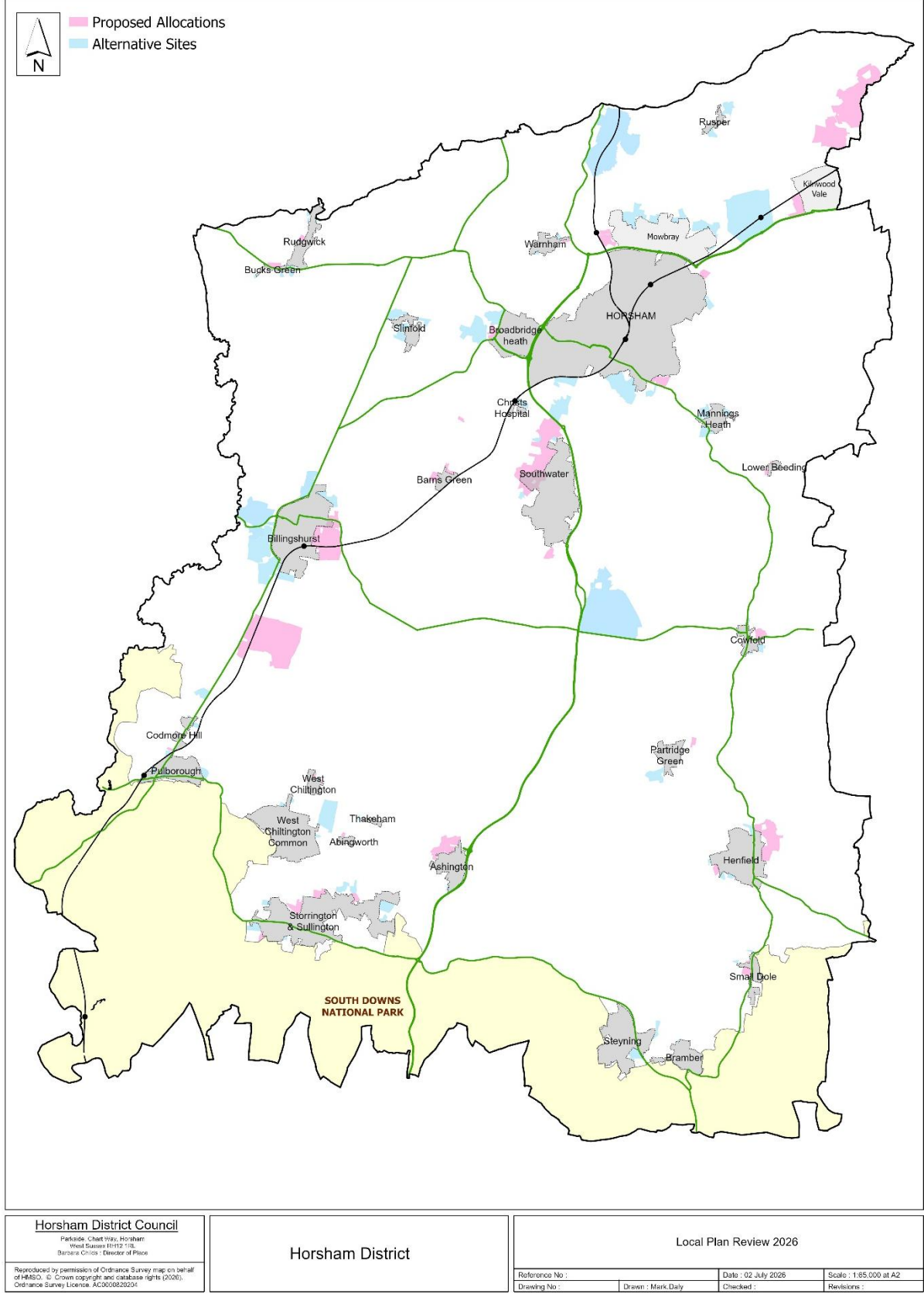
For context, there is also a second submission allocation for 55 homes, and there are also a number of other sites around the edge of the village recently constructed, under construction, permitted or with pending planning applications, including a site to the south that falls within the SDNP and has permission for 78 homes.

- Partridge Green – there are three submission allocations for a total of 255 homes (two of which now have planning permission) and the proposal is to extend one of these to deliver an additional 80 homes, such that there would be a significant concentration of growth across three sites to the north east of the village. The proposed site would expand the north east growth area eastwards as far as a bridleway / former lane that should then form a defensible boundary. For context, there is also a pending planning application for 101 homes to the south west of the village ([DC/25/1922](#)).
 - Lower Beeding – is a fourth tier settlement, but there is a primary school, and the village has reasonable links by road to Horsham and Crawley. The proposal is to allocate two sites for a total of 28 homes, which are adjacent sites located to the south west of the village, and which somewhat represent infill (there is a pending application for 24 homes on one of the sites; [DC/26/0640](#)). There are two submission allocations to the north of the village for a total of 37 homes (one is now permitted for 30 homes; [DC/24/1763](#)) and there is also a nearby site under construction for 22 homes.
 - Rudgwick and Bucks Green – the proposal is to allocate a site for 15 homes that benefits from being very well contained but there is biodiversity sensitivity given an adjacent ancient woodland / stream corridor and also noting a surface water flood channel passing through the centre of the site. There is also heritage constraint noting a series of adjacent listed buildings. For context, there are two adjacent submission allocations where the proposal is now to support 96 homes in line with recent planning permissions (the larger site has a resolution to grant permission for 90 homes; [DC/25/1269](#)) in contrast to the proposal at submission for a total of 66 homes.
 - Barns Green – the proposal is to allocate a site for 10 homes that relates well to the village built form and is well contained by a mature hedgerow. Also, it can be noted that there was previously a refused application for 63 homes ([DC/15/0029](#)). For context, there are two adjacent submission allocations for a total of 75 homes, and one of these is now the subject of an application for 68 homes ([DC/25/2057](#)).
 - Small Dole – is a fourth tier settlement without a primary school, but the village is located in the south of the District and there is direct access onto an A-road. The proposal is to allocate one site for 10 homes, which is located adjacent to a recently constructed site for five homes, and where there is currently a pending application for 9 homes ([DC/26/0638](#)). The site includes an element of PDL and relates very well to the built form of the village, and there is a strong case for ensuring a scheme that delivers 10 homes such that there is a requirement to deliver affordable housing. The Submission Local Plan allocates one site for 40 homes, where there is now a pending application for 45 homes ([DC/25/1019](#)), and it can also be noted that to the north of the current proposed allocation for 10 homes is an area of land that has recently been the subject of several planning applications (currently there is a pending application for 9 homes; [DC/25/0849](#)). Finally, it can be noted that Small Dole is in proximity to key viewpoints along the scarp slope of the South Downs, most notably Edburton Hill.
- 2.2.18. Having discussed the 18 sites that are new proposed non-strategic allocations (Main Mods), the question is whether any warrant being progressed to the RA growth scenarios as a 'variable' or, alternatively, whether all can be progressed as a 'constant'.
- 2.2.19. On balance, the conclusion is that all can reasonably be progressed as a **constant**, in light of the discussion presented above, but also more broadly because there is considered to be limited case for questioning the officer-led site selection process in respect of non-strategic sites. Summary considerations to support this conclusion are:
- Henfield – there is a degree of concern in respect of a somewhat piecemeal high growth strategy, but there is a strategic case for growth as Henfield is a second tier settlement in the south of the District not located adjacent to the SDNP.

- Ashington – is a third tier settlement but benefits from being well linked to the south coast via the A24, and there is a logic to the proposed large new allocation.
 - Kilnwood Vale – this is overall considered to be a strongly performing option but there is a need to guard against the risk of ongoing westwards sprawl along the A264.
 - Horsham – the new proposed site is within the High Weald NL but there is nonetheless considered to be a clear case for allocation. It is also grade 1 agricultural land.
 - Cowfold – whilst there is limited strategic case for additional growth the new proposed allocation is considered to perform well in site-specific terms.
 - Southwater – is a second tier settlement well linked to Horsham, located on A24 and with a nearby rail station, but there is a need to guard against problematic high growth. The proposed allocation is somewhat constrained, but mitigation can be envisaged.
 - Billingshurst – there is a logic to ensuring a more comprehensive approach to the east, but there is a need to carefully consider overall growth strategy for Billingshurst.
 - Storrington and Sullington – there is a strategic case for growth as this is a second tier settlement located in the south of the District, but there are constraints to growth. The two new proposed allocations are constrained, but mitigation can be envisaged.
 - Partridge Green – there is limited strategic case for growth, but the proposed allocation appears to be a fairly logical extension to a submission allocation (now permitted).
 - Lower Beeding – is a fourth tier settlement but there is a primary school, and the two proposed allocations are modest in scale and appear to give rise to limited concerns.
 - Rudgwick and Bucks Green – the proposed allocation is modest in scale and well contained / relates well to the village, although there are some significant constraints.
 - Barns Green – the proposed allocation appears to give rise to limited concerns. The village is in proximity to higher order settlements albeit connected by minor roads.
 - Small Dole – is a fourth tier settlement without a primary school, and there is a need to consider growth strategy, but the village benefits from links to the south coast towns.
- 2.2.20. Having discussed strategic site options and the emerging proposed non-strategic allocations, the final site options to consider are those non-strategic sites that are *not* proposed for allocation at the current time ('omission sites').
- 2.2.21. There is a clear strategic case for testing the possibility of higher growth from non-strategic sites as a **variable** across the RA growth scenarios.
- 2.2.22. However, it is difficult to pinpoint specific sites for testing, from the selection of sites assessed in Part D of the Site Assessment Report (as updated in June 2026).
- 2.2.23. There is a need for a proportionate approach to identifying a package of sites for testing, and the approach taken was to examine each settlement in turn, giving consideration to: A) spatial strategy considerations (e.g. the settlement hierarchy, the strategic case for boosting supply in the south of the District, and settlement-specific spatial strategy factors e.g. relating to infrastructure); B) the supply of homes that the settlement is set to see over the plan period from commitments, submission allocations and new proposed allocations (as discussed above) also mindful of possible additional supply from pending planning applications; and C) the merits of the available omission sites, including in terms of deliverability (although as a pragmatic step the focus was primarily on larger sites); before D) reaching a conclusion on whether there is a reasonable scenario involving allocation of one or more non-strategic omission sites. Figure 2.1 shows all omission sites (including strategic omission sites that have already been discussed above), labelling these as 'alternative sites',¹¹ alongside the emerging proposed allocations (submission and Main Mods) that have already been introduced above.

¹¹ 'Omission sites' is perhaps a more accurate term because 'alternative sites' may imply a mutually exclusive choice.

Figure 2.1: Proposed allocations (submission + Main Mods) and omission sites



2.2.24. The conclusion reached that it is appropriate to test a package of 6 non-strategic omission sites to deliver a total of 400 homes. Specifically, the non-strategic omission sites for testing are as follows (N.B. these are *indicative* sites for SA purposes):

- SA565 (Land at Hilland Farm, Billingshurst (100 homes) – located at a second tier settlement and well contained by permitted sites to the north and south and woodland to the east. However, this is a complex site and broad area, as the west of the site has planning permission for employment land, whilst to the north is: A) a permitted employment site where there is now a pending application to ‘re-masterplan’ to deliver a mixed use scheme (DC/25/1697); and B) a site recently granted at appeal for 125 homes (DC/24/0749). Also, a row of large pylons adjacent to the east of Hilland Road create a challenge in terms of effectively integrating with the settlement edge.
- SA894 (Land West of London Road, Henfield; 30 homes) – on the one hand there is limited strategic case for higher growth at Henfield given the risk of problematic high growth. However, on the other hand, there is a strategic case for considering higher growth given road links to the south coast towns. The site in question could somewhat round-off the settlement edge given a permitted site to the west and the new proposed allocation for 450 homes to the east (as discussed above); however there is a need to account for a significant surface water flood channel (the site capacity reflects this).
- SA088 (Land north of Forest Road, Horsham; 20 homes) – this site is located in the High Weald NL, and there was previously a refused application for 20 homes. It sits within a broad landscape area to the east of Horsham identified as having ‘no/low’ capacity for medium or large-scale housing, but it would deliver a small scheme that might relate reasonably well to the settlement edge and be well-contained. There is a strategic case for testing at least one non-strategic omission site at Horsham.
- SA129 (Land at Christ’s Hospital, west of Southwater; 150 homes) – Chris’s Hospital is a fourth tier settlement without a primary school but the site in question is adjacent to a rail station with a good service (half hourly in both directions), and there is also bus connectivity to nearby Horsham. The site is promoted as being able to deliver an expanded station car park, but the latest situation is that this is set to be delivered in any case by the North West Southwater submission allocation. There are constraints including an adjacent ancient woodland (designated as a Local Wildlife Site) onsite Tree Protection Orders (TPOs) and a footpath that passes centrally through the site. The site benefits from strong containment, but it is difficult to envisage a scale of growth that enables delivery of a primary school or community hub for the village.
- SA486 (Land adjacent to Clay Lane, Storrington and Sullington; 50 homes) – there is a strategic case for testing higher growth given proximity to the south coast towns. However, there are constraints to growth at the village, and there is a need to factor in potential in-combination challenges associated with recent completions, commitments, submission allocations and new proposed allocations. The site forms part of the final area of land to the south west of the village that falls outside of the SDNP, and previously there was a proposal for comprehensive growth within this parcel of land. However, the situation now is that the eastern part of the wider parcel (which relates best to the village edge) is a new proposed allocation for 30 homes, and the southern part of the wider parcel no longer available. In turn, the assumption is a 50 home scheme to the south of Chapel Lane and east of Clay Lane, but Clay Lane is the boundary with the SDNP, and the South Downs scarp slope is prominent in the landscape (a footpath passes through the site. Also, access appears to be challenging, and there is a need to consider that traffic passing through the historic village centre, where there is a designated air quality management area (AQMA).
- SA499 (Land to the rear of Fairlands, Storrington and Sullington; 50 homes) – there is an adjacent submission allocation and there has been recent growth nearby, such that there is a concern regarding ongoing sub-optimal development creep, but the site benefits from proximity to a primary school and there are relatively limited SDNP concerns. Also, there is some potential to access the A24 via Rock Road, thereby avoiding the village centre, but from Rock Road there is only a left turn onto the A24.

2.2.25. Having now discussed all categories of supply, Table 2.1 presents a summary.

Table 2.1: Summary of constants and variables

Supply component	Constant or variable	Comments
Completions & commitments	Constant	10,618 homes
Windfall	Constant	1,440 homes
Submission allocations (as adjusted by proposed Main Mods)	Constant	5,018 homes
New strategic allocations	Variable	Three sites hence 6 feasible combinations.
New non-strategic allocations	Variable	Two scenarios: 1) the emerging proposed allocations; and 2) additional allocation of the indicative package of six omission sites.

2.2.26. The final task is to combine constants and variables to form reasonable alternative (RA) growth scenarios for appraisal and consultation.

2.2.27. A starting point is the emerging proposed approach, which involves allocation of Adversane new settlement (1,425 homes in the plan period) plus 18 non-strategic allocations for a total of ~2,414 homes. In combination with supply from completions, commitments, windfall and submission allocations the total local plan supply would be 20,915 homes, i.e. a figure 49% higher than LHN, such that the housing requirement could be set well above LHN so as to make provision for half of Crawley's unmet need and a modest proportion of the unmet need arising from the south coast (the proposed approach is to set the requirement at 18,712 homes). This is **Scenario 1**.

2.2.28. Next is a scenario as per Scenario 1 but with Adversane replaced by Buck Barn, which would also deliver around 1,500 homes in the plan period. This is **Scenario 2**.

2.2.29. Next there are two scenarios involving additional allocation of the indicative package of 6 non-strategic omission sites, namely:

- **Scenario 3** = Scenario 1 plus the indicative package of non-strategic omission sites
- **Scenario 4** = Scenario 2 plus the indicative package of non-strategic omission sites

2.2.30. Next there is a need to consider West of Billingshurst and, on balance, it is considered reasonable to only test the possibility of allocating West of Billingshurst so as to deliver higher growth, i.e. it is reasonable to assume it would only be allocated *in addition* to another new strategic allocation. Furthermore, and as discussed, it is reasonable to rule out the possibility of allocating West of Billingshurst in addition to Adversane. As such, **Scenario 5** involves Scenario 2 plus additional allocation of West of Billingshurst.

2.2.31. Finally, **Scenario 6** sees high growth via allocation of both Adversane and Buck Barn.

2.2.32. These six RA growth scenarios are set out in Table 2.2. Final points to note are:

- Whilst there are other site combinations there is not necessarily a need to appraise on every feasible site combination in order to 'tease out' the key issues and impacts, and there is a need to minimise the number of scenarios aimed at effective consultation.
- Work to define growth scenarios was out of necessity undertaken in May / June 2026 in parallel with wider site selection and evidence gathering workstreams including work by officers to update the Site Assessment Report. This is a methodological limitation.
- Defining growth scenarios must be a proportionate exercise and ultimately it is considered that the requirement to present "*an outline of the reasons for selecting the reasonable alternatives*" [SEA Regulations; emphasis added] has been met.

Table 2.2: The RA growth scenarios (constants greyed-out)

Scenario	1 Adversane	2 Buck Barn	3 Adversane Non-strat.	4 Buck Barn Non-strat.	5 Buck Barn W. B'hurst	6 Adversane Buck Barn
Completions & commitments	10,618	10,618	10,618	10,618	10,618	10,618
Windfall	1,440	1,440	1,440	1,440	1,440	1,440
Submission allocations	5,018	5,018	5,018	5,018	5,018	5,018
Adversane	1,425	0	1,425			1,425
Buck Barn	0	1,500		1,500	1,500	1,500
West of Billingshurst	0	0	0		1,000	
New non-strategic sites	2,414	2,414	2,814	2,814	2,414	2,414
Total homes	20,915	20,990	21,315	21,390	21,990	22,415
% above LHN (14,071)	49%	49%	51%	52%	56%	59%

2.3. Growth scenarios appraisal

- 2.3.1. Set out below is an appraisal of the six growth scenarios under the 'SA framework', which primarily comprises a list of 17 sustainability topics.¹²
- 2.3.2. The appraisal is summarised in a 'matrix' with a column for each of the SA topics and a row for each of the scenarios, where each row aims to:
- 1) rank the scenarios in order of performance;¹³ and then
 - 2) categorise performance in terms of 'significant effects' on a red/amber/green scale.¹⁴
- 2.3.3. The aim is essentially to communicate the pros and cons of each of the scenarios, in both relative and absolute terms, and, in turn, to communicate that there are no easy options and a decision must be made regarding which scenario is preferred on balance.
- 2.3.4. The appraisal serves to highlight Scenario 1 (the emerging proposed approach), Scenario 2 (which sees Adversane replaced with Buck Barn) and Scenario 6 (the emerging proposed approach plus Buck Barn) as potentially performing well overall, having accounted for both the order of preference under the various topic headings and predicted effects. However, it is important to be clear that the appraisal does not *necessarily* lead to a conclusion that any of these three scenarios performs best overall, because: A) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and there is little reason to suggest equal weight); and B) the topic specific appraisal conclusions are open for debate (indeed an aim is to spark debate).

¹² Each of the topics is associated with an 'objective', as explained further in Section 3 of this report. The SA framework was established via a process of 'scoping' and further information on the SA scope is presented in the submission SA Report.

¹³ Within each row a star indicates the best performing scenario(s). Also, "=" is used where it is not possible to differentiate with confidence, and "?" is used where it is not possible to differentiate and there is a highly level of uncertainty at this stage.

¹⁴ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- 2.3.5. For example, any interested party, when considering the overall merits of the scenarios, might choose to give weight to 'housing' and, having done so, conclude an overall preference for Scenario 3 or Scenario 4 (which involve allocation of an indicative set of six non-strategic omission sites), perhaps alongside a view that the appraisal overplays the disbenefits of these scenarios and also underplays the disbenefits of Scenario 6. Furthermore, boosting supply from small sites could assist with a robust housing land supply such that there is greater confidence in being able to maintain a five year housing land supply over the coming years and, in turn, a reduced risk of facing the presumption in favour of sustainable development, with positive implications for many objectives.

Table 2.3: Growth scenarios summary appraisal

	Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
Housing	5	4	3	2	2	★1
Access to services and facilities	★1	2	3	3	4	2
Inclusive communities	=	=	=	=	=	=
Crime	=	=	=	=	=	=
Health & wellbeing	2	★1	2	★1	2	★1
Biodiversity	=	=	=	=	=	=
Landscape	★1	★1	2	2	2	★1
Historic environment	★1	★1	2	2	2	★1
Soil quality	2	2	3	3	★1	★1
Natural resources	=	=	=	=	=	=
Water resources	?	?	?	?	?	?
Flooding	=	=	=	=	=	=
Transport	2	★1	2	2	3	4
Air pollution	★1	★1	2	2	★1	★1
Climate change	=	=	=	=	=	=
Economic growth	5	4	3	2	3	★1
Employment	=	=	=	=	=	=

- 2.3.6. Having presented a summary of the appraisal, set out below is a more detailed appraisal of the RA growth scenarios under each of the sustainability topics in turn.
- 2.3.7. With regards to appraisal methodology, further points to note are as follows:
- Variables – each of the appraisal narratives begins with a discussion of the factors that allow for differentiation between the scenarios, i.e. a discussion of the ‘variables’.
 - Constants – having discussed the variables, each narrative then considers the 16 new proposed allocations that are held constant across the scenarios, i.e. such that they do not have a bearing on conclusions reached in terms of the differential performance of the scenarios but do have a bearing on predicted ‘significant effects’.
 - Significant effects – each appraisal narrative ends with a discussion of significant effects, but it should be noted that concluding on significant effects is challenging and subjective. Each discussion begins by recording the conclusion reached on significant effects in respect of the local plan as a whole at the point of submission, but two points to note are: 1) this conclusion accounted for development management (DM) policies (area-wide and site-specific), whilst the current appraisal of growth scenarios aims to keep assumptions regarding DM policies to a minimum; and 2) at the current time significant effects might be predicted in respect of the local plan as a whole and/or main modifications (the latter being the current focus of consultation). On balance, significant effects are predicted for the plan as a whole (as modified), recognising that main mods under consideration at the current time go to the very heart of the plan.
 - Evidence – the appraisal below makes extensive reference to the submission version of the Site Assessment Report (SAR), but there are also some references to the updated SAR (2026), which was completed in late June 2026. Other evidence base studies were also completed in late June and have factored-in as far as possible.

Housing

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
5	4	3	2	2	1

- 2.3.8. Whilst there is little or no case for providing for more than 50% of Crawley’s unmet housing need (given the potential for Mid Sussex to also make a significant contribution), there is a clear strategic case for higher growth so as to provide for a higher proportion of the very extensive unmet need arising from the south coast towns.
- 2.3.9. Whilst there is no clear evidential basis for apportioning unmet need from the south coast towns across the local authorities to north, there is reason to suggest that Horsham and Mid Sussex are better placed than other authorities – see Box 2.1 (which considers unmet need across Sussex as a whole in order to provide context, although it should be noted that Horsham does not link at all well to coastal East Sussex). Also, there is likely unmet need from Surrey, but this is a less pressing issue for Horsham.
- 2.3.10. As well as total growth quantum, the order of preference reflects a view that:
- There is a case for Buck Barn over Adversane because Buck Barn relates better to the south coast towns via the A24. This was point was clearly acknowledged in the Site Assessment Report (SAR) at the time of submission.¹⁵

¹⁵ In respect of Buck Barn the submission SAR stated: “Locationally the site is situated centrally within the District on A24 and A272. The A24 is the only dual carriageway in the District and provides road links to Horsham, Crawley and the south coast... It is considered that the central location of the site... may provide good opportunity for homes to be delivered that meet the needs of the District as well as being directly connected to the road to the South coast by the A24.” In respect of Adversane, the SAR stated: “... this site is geographically less well connected to the settlements of Horsham, Crawley and the south coast and the site therefore performs less well in terms of how it can meet District and wider sub regional requirements.”

- There is limited 'housing' case for higher growth at Billingshurst (Scenario 5). Also, whilst the West of Billingshurst site promoter suggests early delivery (initially with the northern part of the site coming forward for around 300 homes), the updated SAR (2026) explains: *"The Council's evidence on housing delivery indicates that market capacity in this part of the District would make timely delivery of more than one strategic site in the area challenging... Viability information has been provided to the Council. This indicates that development could be delivered... More detail would be required to support any allocation for there to be sufficient certainty regarding delivery."*
 - All three of the 'variable' strategic sites could deliver Gypsy and Traveller pitches, which is a very important consideration given high need and limited supply options. Also, the proposed southern extension to the submission East of Billingshurst allocation, which is a 'constant' across the growth scenarios, could potentially deliver new pitches. The Submission Local Plan explains that *"the identified Gypsy and Traveller needs for the first 10 years of the Plan and for Travelling Showpeople, can be met through the regularisation or intensification of existing sites, and through the allocation of new sites"*; however, there is also a need to consider further need to 2040, plus an update to the Gypsy and Traveller Accommodation Needs Assessment (GTAA, 2025) identified slightly increased need over the first five years (2 pitches). A further consideration is possible unmet need, but it is not clear this is a significant factor.
 - There is a clear case for boosting supply in the earlier years of the plan period via additional smaller allocations (Scenarios 3 & 4), with a view to a less stepped housing requirement and/or increased supply headroom over the requirement (as a contingency for delivery issues / to ensure that the requirement is delivered and the council can maintain a 5YHLS). Also, the indicatively shortlisted non-strategic omission sites are mostly sites likely to benefit from strong development viability such that they would be well-placed to deliver the full policy quota of affordable housing. Not all of these sites are being actively promoted though (e.g. north of Storrington) and delivery at the site north east of Billingshurst could be challenging, including noting pylons that separate the site from the existing settlement edge.
- 2.3.11. With regards to the 18 new proposed allocations that are a 'constant' across the growth scenarios: A) there is merit to the proposed approach in terms of boosting supply in the south of the District, particularly at Henfield and Ashington, but also at Storrington, Cowfold, Partridge Green and Small Dole; B) there is also one new proposed allocation at the eastern edge of Horsham (within the National Landscape) that is well-linked to Crawley; C) the updated SAR (2026) states three of the sites (one permitted) have been proposed to deliver 45% affordable housing; and D) several have pending planning applications which is an indication of the potential to deliver early.
- 2.3.12. Also, it is important to note that the focus is primarily on greenfield sites, including in higher viability areas (notably Henfield and Ashington), as understood from the Viability Study (2026). The Study explains in respect of brownfield sites: *"some are shown to be viable with a reduced affordable housing contribution of 10%."* It also states: *"We recommend that flexibility is allowed within policies for sites and developments which have been shown to be less viable, including exclusively flatted developments on brownfield sites, older persons housing and build-to-rent accommodation."*¹⁶
- 2.3.13. With regards to significant effects, at submission the conclusion was that the plan would give rise to a minor positive effect, but a much more positive conclusion can be reached at this stage. The proposal is to set the housing requirement at 25% above LHN over the plan period, albeit with a heavily stepped requirement. The total plan period supply is then significantly higher which gives confidence in the ability to deliver the housing requirement in practice.¹⁷ The Housing Delivery Study (2026) considers the requirement (albeit only from a market capacity perspective) to be *"challenging but deliverable."*

¹⁶ In contrast, with regards to the proposed strategic allocations (including submission sites) the Viability Assessment concludes that these are viable having considered: *"... the cumulative impact of the updated policy costs, as well as 35% affordable housing (except for West of Ifield at 40%), S106 contributions, on-site infrastructure costs and CIL contributions."*

¹⁷ Specifically, there is a need to maintain a rolling five year housing land supply (accounting for the need to apply a 5% or 20% buffer as part of the calculation) in order to avoid the presumption in favour of sustainable development. A supply 'headroom' aimed at ensuring a rolling 5YHLS is particularly important in the early years of the plan period, i.e. ahead of a new local plan.

Box 2.1: Local plan-making across Sussex and unmet need risk

- Adur – the adopted plan generates significant unmet need, and the review is at an early stage, with no evidence published to date of relevance to unmet need risk.
- Arun – a consultation document in 2024 raised the distinct possibility of generating unmet need: *“This annualised local housing need figure is just **a starting point** and is not a housing target. A housing target will not be known and identified... until key evidence has been collected on Arun’s ability to accommodate housing and other development, supported by infrastructure that is deliverable and viable... and without adversely affecting the built and natural environment or being vulnerable to climate change impacts (e.g. flood risk).”*
- Brighton – the adopted plan ends in 2030 and provides for 660 dpa in the context of housing need at the time of 1,506 dpa and now understood to be ~2,500 dpa. The Inspector’s Report explained: *“Formal requests were sent to other Councils... No positive responses were forthcoming, mainly because other authorities are finding it difficult to meet their own needs.”* An ‘Issues’ consultation document (2024) discussed potential supply for 670 dpa.
- Chichester – the submitted plan generated unmet need, but modifications were then made as part of the Examination in Public such that the adopted housing requirement is set at LHN. Issues though are: A) a short plan period; B) plan period supply below the requirement (it will be boosted through a follow-on plan); and C) supply being dependent on A27 mitigation.
- Crawley – the Inspector’s Report explains: *“Whilst it will be for each authority to ultimately determine precisely how much housing development it can sustainably accommodate within the suitable land available, the cautiousness of [neighbouring] authorities to assist addressing the unmet housing need does not represent a failure... on Crawley’s part.”*
- Eastbourne – a recent draft plan proposed a requirement set at ~42% LHN.
- Hastings – a recent draft plan proposed a requirement set at ~27% LHN.
- Lewes – a recent draft plan identifies 8,568 homes supply with LHN being 15,002 homes.
- Mid Sussex – is now committed to providing for significant unmet need. However, previously the submitted local plan was criticised by the Inspector at the time for a lack of constructive engagement in respect of unmet need, with the context being that whilst there have been sub-regional groups tasked with considering unmet need these have been ineffective.
- Rother – a recent draft plan identifies 8,427 homes supply with LHN being 15,504 homes.
- South Downs National Park – a complicating factor here is that the Proposed Submission Local plan states that LHN is 323 dpa whilst an ‘apportionment study’ that considers how to apportion standard method LHN suggests an LHN figure of 1,048 dpa.
- Wealden – a recent draft plan proposes between 8,000 and 10,000 homes unmet need, depending on whether there is support for a challenging strategic site at Uckfield. The Council points to landscape, biodiversity, flood risk and transport constraints as reasons for generating unmet need, and acknowledges that the proposal to generate unmet need is in the context of very significant unmet need being generated or proposed by neighbouring south coast authorities, namely Brighton, Eastbourne, Hastings, Lewes and Rother.
- Worthing – the Inspector’s Report for the adopted local plan explains: *“Concerns were raised that a failure to agree a solution to housing need in Worthing, and the remainder of the West Sussex area, is a sign of collective failure of the Duty... However, while a solution to the... problem has not been reached, the Council has still sought to address the issue...”*

Access to services and facilities

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
1	2	3	3	4	2

- 2.3.14. School capacity is a key issue for consideration here, with there being a need to direct growth to locations where there is existing capacity (indeed, nationally it is the case that some schools can be under capacity such that they are at risk of closure, given declining birth rates) or where new capacity can be delivered alongside new homes (either a new school or expansion of an existing school where this is a possibility). The Infrastructure Delivery Plan (IDP, 2026) explains: *“According to WSCC, pupil numbers are rising and are likely to continue to do so across the county as a result of population and demographic changes along with the timing, size, tenure and location of new housing.”*
- 2.3.15. In light of these introductory points, the order of preference reflects a view a view that:
- Whilst both new settlements would deliver a secondary school, there is a strong preference for Adversane because there is a significant need for new secondary school capacity in this part of the District, whilst there is less case for a new school at Buck Barn because a new school is set to be delivered by North West Southwater.¹⁸ Furthermore, Adversane is linked with Brinsbury College which provides post-16 education, together with vocational links with the existing businesses. There is an opportunity for this to be expanded, and the college has expressed this aspiration.
 - There is a significant concern with higher growth at Billingshurst in the absence of a new settlement at Adversane (Scenario 5), given the secondary school capacity issues affecting the town, plus the site could set a precedent for further piecemeal expansion to the west of Billingshurst with opportunities missed to plan comprehensively so as to deliver a new secondary school.¹⁹
 - There are some schools capacity concerns in respect of the indicatively shortlisted non-strategic omission sites (Scenarios 3 and 4), most notably at Christ's Hospital, which would see ~150 homes despite the village not benefiting from a primary school.
- 2.3.16. With regards to the 18 new proposed allocations that are a 'constant' across the growth scenarios, there are no firm proposals to directly deliver new primary school capacity, but the submission SAR stated this as a possibility at the Ashington Northern Cluster. Specifically, it stated that land could be made available for a school (and other non-housing uses) alongside 450 homes. However, the latest situation is that there is land safeguarded in the neighbourhood plan to expand the existing school site to the south.
- 2.3.17. Henfield is then another key settlement for consideration, where two adjacent new proposed allocations (one now permitted) would deliver 641 homes (and the permitted site was originally submitted as a much larger site, such that there is a risk of future piecemeal expansion) without delivering a new primary school. However, there are not known to be capacity issues at the village school, or at least issues that cannot be addressed via expansion. For context, it is also noted that the promoters of the non-permitted site previously proposed a larger scheme to include land for a primary school.
- 2.3.18. Final considerations are: A) Small Dole does not benefit from a primary school (but the proposed site is small); B) several sites would increase pressure on the Weald School and Sixth Form at Billingshurst; and C) at Storrington the larger new proposed allocation benefits from relative proximity to the village centre (a tier 2 settlement).

¹⁸ The updated SAR (2026) states in respect of Buck Barn: *“The site promoters have indicated that they could build the education facilities if required.”*

¹⁹ It can be noted that understanding at the current time is that the West of Billingshurst landowner is unwilling to work in collaboration with adjacent landowners to the west of Billingshurst in order to deliver a larger more comprehensive scheme.

- 2.3.19. With regards to significant effects, at submission the conclusion was ‘mixed effects’, but it is now appropriate to predict a ‘moderate or uncertain’ positive effect for those scenarios that would deliver a third secondary school (the North West of Southwater and West of Ifield submission allocations would also deliver a secondary school).
- 2.3.20. This conclusion factors-in some concerns with the 18 constant new proposed allocations, including in respect of secondary school capacity at Billingshurst under those scenarios involving Adversane, recognising that a new secondary school would take time to deliver. At the time of submission the matter of secondary school capacity at Billingshurst was a significant factor that led to sites being rejected that are now proposed for allocation, with the submission SAR stating the following for all omission sites at Billingshurst (N.B. the assumption at the time was that there would not be a new secondary delivered at Adversane): “... *given the quantum of development planned for Billingshurst, and the need to ensure comprehensive infrastructure provision / enhancements to existing facilities and the cumulative impact of additional smaller scale development, the Council considers it would be inappropriate to allocate further sites for development in the settlement. As such, it is not proposed that the site be allocated.*”

Inclusive communities

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.21. It is difficult to meaningfully and confidently differentiate between the growth scenarios in respect of sustainability objectives relating to inclusive communities. At the point of submission the SA Report concluded that the plan as a whole would give rise to a significant positive effect partly because the proposal at the time was *not* to allocate a contentious new settlement; however, at this stage it is very difficult to suggest particular concerns with either of the new settlement options, recognising that in the absence of a new settlement there would be major pressure for expansion of existing settlements (and, indeed, the plan would likely struggle to progress to adoption, such that settlement expansions would be likely to continue to come forward at ‘speculative’ sites under the presumption in favour of sustainable development). Furthermore, there is a need to acknowledge that higher growth in Horsham District would relieve pressure to deliver sub-optimal schemes in neighbouring areas within the sub-region.
- 2.3.22. Further considerations are:
- The promoters of both new settlement options have undertaken a considerable amount of work to develop scheme proposals, such that there is confidence in the ability to viably deliver high quality new communities. See further discussion below.
 - West of Billingshurst would deliver benefits to the town in terms of upgrades to sports and leisure facilities and a new country park, and separation of the site from the wider settlement by the A29 dual carriage way could mean that the scheme is seen as somewhat separate from Billingshurst, although the corollary is that the new community would risk being poorly integrated with Billingshurst.
 - The *variable* non-strategic sites mostly give rise to limited concerns in terms of impacts to existing communities, with the primary consideration likely in respect of developing Christ’s Hospital as a ‘sustainable’ settlement. *Additional* growth at Henfield is somewhat a cause for concern but the site is small and well-contained.
 - Across the package of 18 *constant* new proposed non-strategic sites it is important to recognise that numerous were rejected at the submission stage due partly due to concerns around impacting village “fabric”, including accounting for the cumulative impact of growth across sites. The clearest concern is in respect of growth at Henfield, with the submission SAR stating several times that: “*Henfield cannot be expected to take an unlimited quantum of development.*”

- One constant new proposed allocation of note is Ashington, where the updated SAR (2026) explains: *“It is considered that ‘ad-hoc’ development of individual parcels coming forward without regard to neighbouring land parcels could prejudice the wider comprehensive development of the area and may be an inefficient use of land and undermine well designed places and placemaking.”*
- Also, at Partridge Green the SAR stated that the new proposed allocation would need to be delivered as “part of a comprehensive proposal with SA433” but the latter site now has permission.

2.3.23. Overall, it is not possible to meaningfully and confidently differentiate between the growth scenarios. With regards to significant effects, whilst the Submission Local Plan is thought to generate relatively limit concerns amongst local communities, there is a need to flag a risk with the new proposed strategy under all scenarios ahead of consultation and subsequent work to consider and action responses.

Crime

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

2.3.24. It is difficult to meaningfully comment on the merits of the growth scenarios in respect of sustainability objectives relating to crime. The SA Report at submission concluded a minor positive effect for the plan as a whole, but it is not clear to what extent this was a factor of spatial strategy / sites, as opposed to DM policies. At this point objectives relating to crime are not considered to be a significant factor with a bearing on the appraisal, although views to the contrary are welcomed. One factor could be the importance of providing for unmet housing needs arising from urban areas in the subregion where overcrowding is an issue and one that may correlate with crime rates.

Health & wellbeing

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
2	★1	2	★1	2	★1

2.3.25. The first point to note is that all three of the strategic site options have the potential to deliver a healthcare facility, although this might only be a small-scale or outreach facility in the case of West of Billingshurst, and in all three cases there is inherent uncertainty regarding delivery as it would be contingent on future decision-making by the NHS Integrated Care Board. Further points regarding the three strategic sites are as follows:

- Adversane – the submission SAR concluded *“a clear commitment to promotion of healthy lifestyles and provision of local healthcare”* and identified the potential for a *“compact” new settlement supportive of walking and cycling*. However, relative to Buck Barn the scheme vision performed less well in terms of integrating green / blue infrastructure, open space and community facilities aimed at a *“cohesive community”*.
- Buck Barn – whilst the submission SAR scored Buck Barn on a par with Adversane under the ‘Health’ heading, it scored Buck Barn much more favourably under ‘Leisure / Recreation / Community Facilities’. It described a *“strong and clear vision”* including:

“The site promoters state one of their core principles is to create a sense of place by introducing and enhancing the ability to use the green space around them. It has set out specific provisions of outdoor and indoor recreational facilities and spaces. These are four areas of allotments; a country park for informal recreation and nature exploration; a central village green/cricket pitch/football pitch; further football pitches in the northern part of the site; multicourts (MUGAs) for outdoor sports; four playgrounds, and two skate park/ball court/bike track areas. A village hall, further neighbourhood hall and indoor sports hall are proposed. Around 50% of the site area is proposed as green infrastructure including a linear park following the river and a country park area alongside the Downs Link strategic cycle route.

... The emerging masterplan also proposes a pedestrian/cycle ‘river corridor’, woodland walk paths, and enhancement of existing public rights of way, including improved connections from the site to the Downs Link strategic leisure route.

... A community hub is also proposed to be provided in partnership with the Plunkett Foundation, to accommodate a community shop, community café, and... community workspaces. Other hub features have been indicated as light-touch laboratory space, gym, private nursery, healthcare provision/pharmacy, pub/hotel and library.”

It might also be suggested that this distinct offer could compliment the different but also distinctive offer at recently permitted Horsham Golf and Fitness site to the north.

- West of Billingshurst – the submission SAR concluded a neutral effect under ‘Health’ (compared to a favourable effect for Adversane and Buck Barn) and a favourable effect under ‘Leisure / Recreation / Community Facilities’ (compared to a neutral effect for Adversane and a very favourable effect for Buck Barn) but an unfavourable effect under ‘Development quality’ (compared to favourable for Adversane and very favourable for Buck Barn). Explanation provided within the SAR included:

“The Northern parcel is relatively separate from the southern parcels and from the existing settlement. The homes could therefore lack any cohesive community core.”

“The site would provide a new country park... including 40 allotments and a community orchard. A new leisure centre including a gym, indoor tennis court, padel court and a new 3G playing field on the parcel at Hilland Roundabout... would be provided to extend the offer at Jubilee Fields. It is noted that this has support within the existing community. A community hub is proposed in the Country Park. These facilities would provide benefits for the new and existing communities... However, the scale of development is such that there would be continued reliance on existing community networks and the existing village centre facilities in Billingshurst and given the development form and relationship with the existing village, there may be limited ability for the development to achieve a cohesive community with a clear sense of place.”

“Although geographically close to Billingshurst, the A29 presents a significant physical barrier in terms of accessing wider community facilities by active travel (i.e. walking, wheeling and cycling), with poor permeability with the existing settlement resulting (only a single bridge crossing for non-motorised users would provide a direct link from the larger southern residential parcels to the rest of the village). Limited work has been undertaken and provided as to how existing bus services could access the new development, however there is low certainty as to whether this would be achieved. A potential mobility hub and car clubs are suggested but no detail is provided as to how this could operate successfully. Access to the railway station, particularly by active travel modes, is sub-optimal and would also need to be significantly enhanced.”

- 2.3.26. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), it is difficult to suggest significant health issues / opportunities, but one point of note is in respect of possible growth to the north east of Billingshurst. Specifically, growth here would complete expansion of the settlement as far as a series of woodlands such that, in turn, there might be a green infrastructure opportunity to explore (there appears to be limited accessibility across the wooded landscape to the north east of Billingshurst).
- 2.3.27. With regards to the 18 new new proposed allocations that are held constant across the growth scenarios, points to note include:

- Henfield is proposed for notably high growth and has an existing medical centre.
- Ashington – is proposed high growth and does not have a medical facility. However, the proposed scheme, if delivered comprehensively, has the potential to deliver a multi-functional community space that could potentially incorporate a small medical facility, plus the scheme has the potential to deliver wider community and sports facilities allotments and multifunctional green /open space.
- Cowfold, Partridge Green and Rudgwick – are third tier settlements that benefit from a GP surgery, but the submission SAR stated limited or no capacity at Cowfold.
- Small Dole and Lower Beeding – are both fourth tier settlements without a GP surgery.
- Barns Green – the small proposed allocation could deliver high quality greenspace.
- Kilnwood Vale – it is noted that the existing Kilnwood Vale scheme originally made provision for a new health centre, but NHS Sussex Integrated Care Board (ICB), formerly the Clinical Commissioning Group (CCG), has confirmed this is no longer considered a suitable location. The updated SAR (2026) explains:

“Importantly, the site would not place undue strain on new infrastructure provision, but rather would help sustain the delivery and ongoing viability of committed infrastructure within Kilnwood Vale. Additional population would support the viability of the planned neighbourhood centre, public transport services, and community facilities, ensuring critical mass is achieved in line with the original strategic vision.”

- 2.3.28. Finally, with regards to the proposal to deliver an additional 500 homes within the committed North Horsham strategic site, there are not understood to be any major tensions with masterplanning objectives, e.g. in respect of greenspace, but this is a matter that warrants further investigation.
- 2.3.29. With regards to significant effects, at submission the conclusion was that the plan would give rise to a minor positive effect, and this informs a view that all of the growth scenarios would have a ‘moderate or uncertain’ positive effect. The strategic sites all represent a degree of opportunity (particularly Buck Barn) and there are limited concerns regarding new non-strategic allocations under any of the scenarios. It is important to emphasise the challenge in respect of planning for health infrastructure, with the IDP (2026) explaining:

“Horsham and Mid Sussex CCG’s representation on the Regulation 18 consultation commented that the Local Plan could result in between 15,000 and 19,000 new dwellings in the District, which could equate to 37,500 to 47,500 new patients... In order to accommodate this increase, they have advised that existing GP practice buildings will require “meaningful alterations”.”

Biodiversity

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.30. It is difficult to differentiate between the three strategic site options, with all three rated ‘unfavourable’ by the SAR at the time of submission. However, it can also be noted that the submitted SA Reports conclude a preference for Buck Barn.

- 2.3.31. Perhaps a primary consideration is that Adversane and West of Billingshurst are located in the west of the District, which is broadly an area of constraint, particularly relating to the Mens SAC, around which there is a 12km Bat Sustenance Zone, but also noting the Upper River Arun SSSI. However, whilst Buck Barn is distant from internationally and nationally designated sites, this is nonetheless a broadly sensitive area associated with a high density of woodlands, including ancient woodlands, and a network of river and stream corridors associated with the upper reaches of the River Adur.
- 2.3.32. The following bullet points further consider analysis from the submission SAR:
- Adversane – whilst relatively close to the Mens SAC, functional links with the SAC are potentially limited or can likely be mitigated. There is limited onsite and adjacent constraint, and the constraints that exist (woodlands and stream corridors) are towards the edge of the site suggesting good potential for avoidance/mitigation (and drawing upon these features for containment).
 - Buck Barn – the submission SAR stated:
“The site has a number of ecological sensitivities. There is an area of ancient woodland on the western edge of the site (alongside the A24), and most of the ‘Downs Link, Nutham Wood & Greatsteeds Farm Meadow’ Local Wildlife Site falls within the site boundaries... The site is also close to the Knepp Estate, albeit separated by the A24. This land is an area that has been part of a rewilding project... now recognised as an important location for biodiversity and nature conservation. It also supports rare Barbastelle and Bechstein bat species.
Overall, it is considered that there are significant issues with regards biodiversity... However, this is balanced against the degree of willingness by the promoter to fully understand these sensitivities and promotion of a scheme that actively seeks to protect and enhance these assets. In particular, it is important that the integrity of ancient woodlands is protected, bearing in mind recreational pressures and the potential for fragmentation... Subject to further development of the masterplan, it is considered that there is reasonable to good prospect of the impacts being mitigated.”
 - West of Billingshurst – as well as relative proximity to the Mens SAC the Upper Arun SSSI is located in very close proximity to the site. The SAR concluded: *“The site promoter’s evidence highlights that these could be adversely impacted [and] biodiversity enhancements could be provided [but] there is very limited information to evidence that impacts could be satisfactorily mitigated.”*
- 2.3.33. Overall, at this stage it is not possible to differentiate between the merits of the sites, but it is acknowledged that weight might be given to the opportunity to deliver significant onsite green and blue infrastructure enhancements at Buck Barn.
- 2.3.34. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), most of these sites are subject to a degree of biodiversity constraint, in particular:
- Chirst’s Hospital – the site here is adjacent to an important ecological corridor associated with a stream and an ancient woodland that is a Local Wildlife Site (LWS).
 - Billingshurst – as discussed there would be a need to consider the integrity of adjacent and nearby woodlands, although the two closest woodlands are not ancient woodland (one is shown on [historic mapping](#) whilst the other is not).
 - Storrington – development of the site to the west would mean that the settlement envelops a wooded stream corridor (although not shown to be associated with any priority habitat) and Parham Park SSSI is approximately 400m to the west of the site.
- 2.3.35. With regards to the 18 new new proposed allocations that are held constant across the growth scenarios, as an initial point it should be noted that several of the settlements in question fall within the Mens SAC Bat Sustenance Zone (Ashington, Billingshurst, Rudgwick, Southwater and Storrington. Sites with wider constraint then include:

- Southwater – there is a need to carefully consider further growth to the south of the settlement given a significant ancient woodland that follows a stream corridor, and given the very high ancient woodland coverage across the wider landscape in this part of the District. Also, it is important to note that the site was previously promoted as part of a wider site that would extend further south, and there is a pending planning application on that part of the site to the south that is now not proposed for allocation.
- Rudgwick – is a linear settlement associated with raised land between two stream corridors, both of which are associated with ancient woodland. The proposed extension abuts ancient woodland and there is also a wooded surface water channel running through the centre of site – linking to the adjacent ancient woodland / stream corridor – that is associated with a historic field boundary (see [historic mapping](#)).
- Barns Green – the site is closely associated with an ancient woodland running along a stream corridor, plus there is a historic field / property boundary along the southern edge of the site associated with trees covered by a Tree Preservation Order (TPO). However, this has informed the site capacity (10 homes).
- Billingshurst – attention focuses on the proposed southern extension to the East of Billingshurst strategic allocation. Specifically, development of this parcel of land would extend the settlement edge as far as a large ancient woodland, and increase the risk of the woodland being somewhat enveloped in the future (noting a site with planning permission to the south of the woodland). Furthermore, a stream corridor runs through the centre of the site, there is a network of historic field boundaries and there is a need to recall the relative proximity of Billingshurst to the Mens SAC. However, sensitivities have factored into site capacity (350 homes compared to the proposal for 500 homes).
- Henfield – much of the site lies within an area of very high potential in the emerging Local Nature Recovery Network, especially at the northern part of this site – Cutlers Brook – which has been identified as an area for possible biodiversity enhancement.

2.3.36. In conclusion, it is not possible to confidently differentiate between the growth scenarios, but at this stage it is considered appropriate to predict a 'moderate or uncertain' negative effect for all scenarios ahead of consultation with key partner and stakeholder organisations (at the time of submission the conclusion was that the plan would give rise to mixed effects). Whilst there is a case for preferring lower growth scenarios / flagging a concern with higher growth, there is also a need to recall that higher growth in Horsham would help to relieve pressure elsewhere within a constrained sub-region.

2.3.37. Finally, the following is a summary of the Habitats Regulations Assessment (2026):

- The Mens SAC – traffic and resulting air quality along the A272 is the primary HRA consideration for the local plan, but the HRA concludes: *“there is a high likelihood that the existing traffic-related air quality mitigation strategy will remain adequate to address the effect of traffic growth due to Horsham Local Plan.”* Another consideration is loss of functionally linked land (Barbastelle Bat), but the HRA concludes: *“while 28 allocated sites (including existing allocations) fall within the relevant zone around the SPA and support suitable habitat for barbastelle bat, the policy approach to delivering mitigation that was identified in the submitted Local Plan can cover these sites.”*
- Arun Valley SAC/SPA/Ramsar site – in respect of water levels, the HRA explains: “... this is no longer a concern, with a strategic solution having been identified by stakeholders including Southern Water and government.” In respect of the loss of functionally linked land (Bewick Swan), the HRA concludes: *“... while 17 allocated sites (including existing allocations) fall within the relevant zone around the SPA and support suitable habitat for Bewick Swan, the policy approach to delivering mitigation that was identified in the submitted Local Plan can cover these sites.”*

Landscape

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
		2	2	2	

- 2.3.38. Beginning with the three strategic sites, an immediate point to note is that the submission SAR concluded ‘very unfavourable’ for West of Billingshurst, particularly because: *“The presence of the Country Park, and the proposed sports pitches mean that the built form of the development would take place on two separate land parcels... This would result in a dispersed and non-cohesive settlement form. In addition, the proposed masterplan shows the southern parcel of land would primarily deliver housing away from the A29 thus further from the existing settlement. This will therefore give rise to a development which lacks any clear relationship with [Billingshurst].”*
- 2.3.39. It is also considered appropriate to flag a concern regarding future development creep to the south, i.e. a risk that West of Billingshurst in turn leads to sub-optimal piecemeal western expansion of Billingshurst. Taking a step back, from a landscape perspective a comprehensive approach to growth west of Billingshurst might involve expansion bounded: to the north by Eaton Copse and its associated stream corridor (also noting a distinct hill), which is the southern extent of a distinctly wooded landscape; to the west by Lordings Road and associated heritage assets (with the River Arun beyond); and to the south by Brockhurst Brook, which is a significant green/blue corridor linking to the River Arun and the northern extent of a distinctly wooded landscape to the south of Billingshurst (also associated with a sewage treatment works and a long distance path).
- 2.3.40. With regards to Adversane versus Buck Barn, at this stage it is considered appropriate to conclude that they perform broadly on a par in landscape terms:
- Adversane – the majority of the site has ‘moderate’ capacity, and whilst there is lower capacity at the northern extent of the site (in proximity to Adversane, which is an attractive historic hamlet appreciated from, albeit also influenced by, the A29), and at the southern extent of the site (in proximity to the South Downs National Park, SDNP, noting a distinct hill to the east of the River Arun, albeit seemingly not accessible), these sensitivities can likely be addressed to a good extent through masterplanning.
 - Buck Barn – some parcels have ‘no/low’ capacity, whilst other parcels have ‘moderate’ or ‘high’ capacity, with sensitivities mainly in the north of the site including noting an attractive lane, heritage assets, footpaths and the gap to Southwater. There is clear potential to draw upon landscape features (topography, woodland, streams, heritage assets, the Downs Link) to frame growth, and overall the potential for a well-contained new settlement can be envisaged. However, growth is proposed in the north.
- 2.3.41. It is also important to note that at Adversane the proposal is for a significantly more compact new settlement, relative to Buck Barn, leading to a more efficient use of land.
- 2.3.42. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), all of these sites are subject to a notable degree of landscape constraint:
- Storrington – the parcel of land under consideration to the west of the village is adjacent to the SDNP and has ‘no / low’ capacity, but the current assumption is a modest scheme that could relate reasonably well to the settlement edge (but there could be pressure for future development of the remaining part of the parcel). There are clear views across the site towards the South Downs escarpment (around 2km distant), a footpath passes through the site that links the village with countryside to the west, and adjacent Clay Lane (the SDNP boundary) is a rural lane associated with heritage assets and views of the escarpment. Access might need to be achieved from Clay Lane, such that a scheme would ‘face away’ from the village.

The following quote from the submission SAR is also of note: *“The prominent southern edge of Storrington hold attractive views of the South Downs and the intervisibility between the urban edge of Storrington and the national park is an important characteristic in this location.”*

Moving on to the shortlisted site to the north, this is less sensitive but the submission SAR nonetheless raised a concern. A concern would also be ongoing piecemeal expansion in this area (noting recent and proposed growth), and there is also a need to consider traffic through the Heath Common area, which is an area of common land / former common land associated with a characteristic low density built form.

- SA088 (Land north of Forest Road, Horsham; 20 homes) – this site is located in the High Weald NL, and there was previously a refused application for 20 homes, but it relates reasonably well to the settlement edge and is quite well contained. Onsite mature trees could limit development capacity. The updated SAR (2026) explains that the site falls within an area that: *“... provides a ‘very important, well defined wooded edge to the existing urban area of Horsham’. Development in this location would therefore adversely impact the rural and well treed approach to the town...”*
- SA129 (Land at Christ's Hospital, west of Southwater; 150 homes) – there is low-moderate capacity for medium scale housing and the Landscape Capacity Study states: *“... the parkland landscape, historic buildings and their distinctive setting, together with its wider importance within the District results in a landscape which is highly sensitive to large-scale development”*.
- SA565 (Land at Hilland Farm, Billingshurst (100 homes) – there is low-moderate capacity but given adjacent permitted sites the potential for a carefully designed scheme to perhaps ‘complete’ the expansion of Billingshurst in this direction might be envisaged, drawing upon adjacent woodlands for containment.
- SA894 (Land West of London Road, Henfield; 30 homes) – there is low-moderate capacity but the site could somewhat round-off the settlement edge given a permitted site to the west and the new proposed allocation for 450 homes to the east. The site would be framed by stream corridors to both the west and the east.

2.3.43. With regards to the 18 new new proposed allocations that are held constant across the growth scenarios, a number were ruled out prior to submission partly on landscape grounds, with quotes from the submission SAR including [emphasis added]:

- Henfield – *“A large extension proposed here would have a very significant adverse impact on the settlement character and form. The majority of the site falls within Local Landscape Character Assessment 2021 which identifies **no/low capacity** for change to accommodate large-scale development such as that proposed.”*
- Southwater – *“The Landscape Capacity Study (2021) assesses that the site has **[no/low] capacity** (Area 26) to accommodate development.”*
- East of Billingshurst extension – *“Development in this location would extend the built form of development further to the southeast. The Landscape Capacity Study (2021) assesses the area to have **[no/low] capacity** for development.”*

N.B. this conclusion is of note, but the site benefits from good containment.

- Storrington – *“Previous planning history in relation to this site has cited landscape impact resulting from development as being negative and would have a detrimental impact on local character.”*
- Lower Beeding – *“... visible on the approach to the village from the west... The lack of integration with the fabric of the village would also need to be addressed and mitigated... development would also alter the settlement form of the village urbanising the development pattern west through ribbon development along Sandygate Lane.”²⁰*

²⁰ The updated SAR (2026) states in respect of the two adjacent sites: *“When considered together, the sites have the potential to form a logical and well-contained extension to the village. A comprehensive approach would enable a coherent layout, including a single point of access...”* However, it is noted that there is a pending planning application on one of the sites.

- Partridge Green – “... a comprehensive scheme comprising of SA637 and SA433 would be seen to extend the settlement form into the open countryside along Shermanbury Road in a somewhat detached extension of the settlement.”

2.3.44. Further considerations are:

- At Small Dole there is considerable SDNP setting sensitivity but the proposed new allocation gives rise to limited concerns, including because it is PDL and: “*The site is well related to the existing settlement form and the horticultural buildings link the site to the existing built form - there is residential development on two sides.*” However, there is a need to consider the possibility of future growth to the north of the site.
- With regards to Land West of Kilnwood Vale (350 homes), the conclusion at submission was that landscape impacts are limited notwithstanding the adjacent National Landscape, but there is a wider concern regarding the westward sprawl of Crawley towards Faygate (where there is a rail station) with Horsham beyond.
- At Storrington the proposal is to intensify an existing submission allocation, with the updated SAR (2026) explaining: “*Taking account of both identified heritage and landscape matters it is considered that any development of this site would need to be focused on the southern part of the parcel, together with the provision of substantial green infrastructure and open space to the north, would ensure a soft transition... and retain the separate identity of Storrington and West Chilington, in accordance with the Green Gap objective of the made neighbourhood plan.*”

2.3.45. In conclusion, whilst there are inherent concerns with higher growth within a District associated with widespread constraint, there is also a need to acknowledge sensitivities across the wider sub-region such that, on balance, there is support for Scenario 6 as allocation of two new settlements would relieve pressure for settlement expansion.

2.3.46. With regards to significant effects, the conclusion at submission was that the plan would give rise to mixed effects, but there is now a clear need to flag a concern ahead of consultation. There is a case for predicting a significant negative effect for the worst performing scenarios, including recognising landscape sensitivities affecting numerous settlement expansion options (including a clear sensitivity relating to the setting of the SDNP); however, on balance a ‘moderate or uncertain’ negative effect is predicted.

Historic environment

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
		2	2	2	

2.3.47. The submission SAR concluded ‘unfavourable’ for all three of the strategic sites in terms of ‘Archaeology / Cultural Heritage’, and the SA Report at the time of submission similarly predicted negative effects for all three sites. Taking the sites in turn:

- Adversane – there are limited sensitivities other than in respect of the Adversane Conservation Area at the north west extent of the site, which is associated with an historic crossroads (now the A29 and the B2133). There is good potential to buffer the conservation area, and it is understood that there would be no need for junction upgrades within the conservation area, but increased traffic is a clear issue, including recognising the in-combination effect with growth at Billingshurst.
- Buck Barn – the north of the site is sensitive given a series of listed buildings, most notably Tuckman’s Farm, which is likely appreciated from an adjacent footpath. The other farm onsite is not listed but is shown on [historic mapping](#), which also shows a footpath through the site as a lane, and a largely unchanged network of woodlands and field boundaries. A further consideration is the risk of future development creep to the south of the A272, where there is a major cluster of assets at Park Farm.

- West of Billingshurst – the key issue is avoiding impacts to Lordings Road to the west, which is a rural lane associated with a series of listed buildings. There is a public house here that is linked to Billingshurst by a footpath that passes through the site.
- 2.3.48. Finally, it is noted that Adversane is within an Archaeological Notification Area.
- 2.3.49. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), four of these sites are subject to limited constraint, but in respect of the other two:
- Storrington – there is a series of listed buildings in the vicinity of the site to the west, which – in combination with clear views of the South Downs escarpment, Clay Lane as a historic land and green/blue infrastructure including a footpath and a stream – likely serve to demarcate the edge of the village and the transition to the South Downs, including noting Grade II* Parham Registered Park and Garden to the west.
- Also, there is a need to consider traffic through the historic village centre (which is also a consideration for the other shortlisted omission site to the north of the village).
- Chirst's Hospital – the submission SAR explained: *"There are no listed buildings on site, or within the immediate vicinity of the site. The site is however close to Christ's Hospital School and the wider setting of these buildings would need to be considered... It is not considered that there is potential on site for a substantial new housing scheme... given the potential impacts on... 8 [trees with a TPO]. In addition, there is a public right of way... traversing the site from east to west."*
- 2.3.50. With regards to the 18 new new proposed allocations that are held constant across the growth scenarios, several are subject to a degree of constraint, perhaps most notably:
- Rudgwick – the site is located behind eight residential properties of which five are Grade II listed. There are also numerous listed buildings to the north, and overall there is a clear case for maintaining the historic 'frontage' built form in this area.
 - Cowfold – whilst there are no onsite or adjacent/nearby listed buildings, the site lies within the setting of the Cowfold Conservation Area (which includes a Grade I church).
 - Henfield – the proposed expansion area to the east of the village is distant from listed assets, but a clear concern is traffic through the historic village centre, where there is a high density of listed buildings. The following is also a notable quote from the submission SAR: *"... the scale of development proposed would have a negative impact on the... character of the village. Further clarification also is sought on access arrangements and providing an adequate, safe vehicular access via the existing housing development located to the west of the site rather than Furners Lane which is single width and contributes towards the setting of the Henfield Conservation Area."*
 - Storrington – with regards to the smaller new proposed allocation to the west, the updated SAR (2026) explains: *"The site lies adjacent to Cobb Court, a grade II listed building. Development in this location has the potential to significantly impact on the setting of this building, and any proposal would need to take this into account."* The site has a long planning history and is currently the subject of an ongoing appeal.
- 2.3.51. In conclusion, the situation is very similar to that discussed under 'Landscape'. When considering the merits of directing growth to two new settlements associated with relatively limited historic constraint there is also a need to recognise that the Council has committed to immediately preparing a new Local Plan that will need to make provision for a significantly higher local housing need (LHN) figure.
- 2.3.52. As a final consideration, it is important to note that the current proposal is to delete one of the submission allocations, namely a site for 12 homes at Rusper on historic environment grounds. The outcome of a recent planning appeal established that the level of development that could be achieved on this site without harm to the adjacent historic designations limits the value in retaining this site as an allocation.

Soil quality

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
2	2	3	3	1	1

- 2.3.53. All three of the strategic site options comprise land shown by the recently published nationally available agricultural land classification (ALC) dataset to be grade 2b quality land, i.e. land that is not 'best and most versatile' (BMV), where BMV land is grade 1, grade 2 or grade 3a. Detailed survey data is available only for part of West of Billingshurst, which finds the land surveyed to be grade 2b quality.
- 2.3.54. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), most do not comprise BMV land according to the new ALC dataset, but the two sites at Storrington are both shown to comprise grade 2 quality land and are in agricultural use.
- 2.3.55. With regards to the 18 new proposed allocations that are held constant across the growth scenarios, two of the sites are shown to comprise grade 1 quality land by the new ALC dataset, namely sites to the east of Horsham (the previous dataset had suggested grade 4) and to the north of Storrington. Also, the site to the east of Henfield that recently gained permission at appeal is shown to be grade 2 quality (whilst the larger site adjacent to the north is shown as grade 3b quality). The large new proposed site at Ashington is notably shown to comprise grade 4 quality land.
- 2.3.56. In conclusion, once again there is support for a strategy involving focusing growth at strategic sites subject to limited constraint in the local and sub-regional context.
- 2.3.57. With regards to significant effects, whilst at submission the conclusion was that the plan would give rise to mixed effects, it is now considered appropriate to predict a 'moderate or uncertain' negative effect for all but the best performing scenarios, recognising that there would be loss of BMV quality land that is arguably 'significant', including some loss of grade 1 quality land. In light of the new ALC dataset it is difficult to conclude that Horsham is a lower constraint district in the sub-regional context.

Natural resources

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.58. It is difficult to suggest significant issues for consideration under this heading that are not better considered under other headings (notably issues relating to soils resources, as discussed above, and water resources, as discussed below). Much of the District is covered by a Minerals Safeguarding Area (MSA) for brick clay, but it is difficult to conclude that this is a significant constraint given the extent of the MSA.
- 2.3.59. With regards to significant effects, at submission the conclusion was that the plan would give rise to mixed effects and, at the current time, a neutral effect is predicted.

Water resources

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
?	?	?	?	?	?

- 2.3.60. The need for water neutrality was a key issue at submission, with a view to avoiding impacting water levels and in turn impacts to the water environment and associated sites of international and national importance for biodiversity. There is no longer a need for water neutrality given an agreed solution in respect of supplying water to the area; however, ahead of consultation with the environment agency and the water company it is still reasonable to flag the risk of the local plan boosting supply leading to a 'moderate or uncertain' negative effect. As part of this, it is acknowledged that planning for water supply is highly challenging given the need to align with Water Resource Management Plans prepared by water companies, and that constrained water supply has risen up the agenda further since the time of submission, including with issues affecting Kent and Hampshire. Whilst site promoters have, over recent years, undertaken work to demonstrate the potential to achieve water neutrality, the latest situation is that in most cases these past proposals have been withdrawn (recognising that measures aimed at achieving water neutrality come at a cost). Indeed, it is notable that many developers with permitted sites have applied to remove conditions relating to water neutrality.
- 2.3.61. There are also inherent uncertainties regarding capacity at wastewater treatment works (where capacity issues can lead to a risk of water pollution), and recognising that capacity upgrades take time and come at a cost. The submission SAR explained: *"The Gatwick Sub-Region Water Cycle Study [2020] reports that large-scale development by Billingshurst and by Crawley (most notably the sites allocated at West of Ifield and East of Billingshurst...) could have implications with regard to capacity at existing wastewater treatment works (WwTW) infrastructure."*
- 2.3.62. Recent evidence comes from the IDP (2026), with key quotes as follows:
- "The Sussex North Water Neutrality Study Part C summarises how an Offsetting Scheme will be operated, financed and governed. The scheme is expected to be significant in both its scale and its complexity..."*
- "... early engagement between developers, the Council and the water companies is essential to ensure that sewerage capacity can be provided without unnecessary delays to development. Phasing of development sites needs careful consideration and early engagement to ensure that additional capacity is provided prior to occupation."*
- "Thames Water has highlighted that upgrades to both the wastewater network and sewerage treatment infrastructure will be required to support the proposed development in the northern part of the district and particularly in relation to the Land West of Ifield development. Between 18 months and 3 years is usually required for planning and delivery of upgrades, and ten years for... major treatment works."*
- "Southern Water has indicated reinforcement works to wastewater infrastructure will be required in order to support the development proposed... A number of sites have limited existing local sewerage capacity... and some will need to take account of existing local sewerage treatment works. Whilst not all of these works will be funded by developer contributions the work will need to be factored into the... phasing/delivery of some sites."*
- "Upgrade works to Crawley Sewage Treatment Works were completed in 2024, at a cost of more than £34 million. The upgrade has improve its ability to treat volumes of incoming sewage, reducing the need for discharges in wet weather."*
- "There are plans to upgrade Billingshurst Wastewater Treatment Works in the 2020-2025 investment period and this upgrade is expected to cater for the currently projected population increases up to 2035."*

Flooding

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.63. The submission SAR favoured Adversane and flagged a concern with West of Billingshurst. However, at this stage it is considered appropriate to highlight a large area of surface water flood risk within the Adversane site, including affecting the area proposed for a primary school, whilst at West of Billingshurst it would likely be possible to masterplan the site so as to avoid development in areas affected by flood risk. At all of the sites there would be potential to design-in high quality sustainable drainage systems (SuDS) and downstream flood risk is not a clear concern at any of the sites.
- 2.3.64. With regards to the non-strategic sites that feature as new proposed allocations across the growth scenarios, most are subject to limited flood risk constraint, in that the sites could be masterplanned with flood risk in mind (green/blue infrastructure and SuDS) without hindering the achievement of wider objectives or the site becoming unviable. However, flood risk is an important consideration for four of the new proposed allocations that are a 'constant':
- East of Billingshurst extension – a fluvial flood zone passes through the centre of the site and there is significant downstream flood risk affecting existing properties. The promoters have undertaken some exploratory work and are proposing a water meadow approach as a high quality Sustainable Drainage System.
 - Rudgwick – the submission SAR explains: *"A drain crosses the site east west through the woodland strip in the centre of the site, the layout of the scheme may need to take this into account... a Drainage Statement would be required."*
 - Ashington – the site is strongly associated with the Lancing Brook, but it seems likely that streams / surface water flood zones intersecting and adjacent to the site could be effectively integrated as part of a green and blue infrastructure strategy.
- 2.3.65. In conclusion, whilst there is a case for supporting higher growth given that most of the sites that are a variable across the growth scenarios are subject to limited flood risk, on balance it is considered appropriate to rank the scenarios broadly on a par.
- 2.3.66. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect. However at this stage it is considered appropriate to predict a 'moderate or uncertain' negative effect ahead of consulting the Environment Agency.
- 2.3.67. Finally, with regards to Sequential and Exceptions Tests Report (2026), this identifies five sites as an exception test, and having undertaken the testing concludes: *"The SFRA Update (2024) (CC04) sets out a range of mitigation measures which will need to be adhered to in future site-specific flood risk assessment along with master-planning, where relevant, and development of the site, and will need to be reflected in HDLP policies... All 5 proposed allocations have satisfied both requirements of the Exceptions Test, subject to adhering to the mitigation measures outlined which reflect both the site assessments and the overarching or, where appropriate, the site specific... policies."*
- 2.3.68. The five sites are as follows:
- HNF3 (Land East of Henfield) – this is a new proposed allocation (Main Mods), but the flood zone is at the very northern extent of the site such that there is clearly good potential to deliver the land at risk as green / blue infrastructure.
 - HOR1 (Land at Hornbrook Farm, Brighton Road, Horsham) – this is a submission allocation. The flood zone is notably associated with the current settlement edge.

- HA2 (Land West of Ifield, Rusper) – this is a submission allocation. It is a large strategic site strongly associated with the confluence of the River Mole and Ifield Brook. As a strategic site there is good potential to plan to avoid flood risk and deliver a green / blue infrastructure strategy that integrates the river corridors.
- STO1 (Land South of Northlands Lane, Storrington) – this is part of an existing allocation now proposed to deliver additional homes. Flood risk affects the northern edge of the site, which is also sensitive in landscape terms, such that there is clear potential to avoid or minimise homes in the flood risk zone (groundwater flood risk).
- STO5 (Land at Bax Close, Storrington) – this is a new proposed allocation (also the subject of an ongoing appeal). The report concludes: *“The site’s risk level reflects that there is a risk of groundwater flooding on 90.3% of the site... A Flood Risk Assessment should be provided as part of any application to demonstrate what measures will be taken to address this and ensure that development, directed away from the higher risk areas, will not increase flood risk off-site.”*

Transport

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
2	 1	2	2	3	4

2.3.69. The submission SAR concluded a preference for Buck Barn and flagged a significant concern with West of Billingshurst. Quotes from the submission SAR include:

- Adversane:
 - “Whilst the promoters seek to safeguard land to allow for the creation of a railway station for the new settlement, there is no prospect of this being deliverable within the plan period, due to the need to upgrade the line to the north...”
 - “There may also be potential for new bus services and links to Billingshurst railway station, and opportunity for new bus services to significantly reduce private car trips. However, the exploration of these opportunities appears to be limited at this stage... The vision ensures that bus stops would be within 400m of all residents.”
 - “Mitigation measures with a cost estimated at £40million have been costed into the proposals... A new road would be created from a new roundabout on the A29 that would link to the B2133 in the north-eastern part of the site. This would form the central thoroughfare of the new settlement and would involve the creation of a bridge over the existing railway line. This re-routing would allow the current B2133/railway line level crossing to be shut, providing safety benefits as well as a more consistent flow of traffic. Network Rail have indicated support for this outcome and have agreed, in principle, the location of the bridge.”²¹
 - “There remain uncertainties as to the extent that the proposed upgrades at Pulborough will provide the necessary mitigation that meets WSCC requirements.”
 - “Whilst... much detailed consideration of transport impacts has taken place, there remain concerns that the rates of trip internalisation are overly ambitious...”
- Buck Barn:
 - “Access to the site would be obtained from the A272 and the promoters have indicated that they would provide enhancements to the A24; this could include a major upgrade to the Buck Barn crossroads to create a ‘hamburger’ roundabout or ‘through-about’, and a new junction at or near the B2135 Steyning Road to allow traffic to safely access the northbound carriageway of the A24. It is proposed to enhance and extend bus services to Southwater, Horsham, Crawley and Brighton.”

²¹ Recent communication with Network Rail suggests that some development could come forward ahead of a railway bridge.

- “The site does not have direct access to a railway station. The promoters are however proposing good quality bus services to the major employment centres of Horsham, Crawley, Worthing and Brighton... It is suggested that road space changes, and improvements to junctions on main roads to improve bus priority, could secure the attractiveness and feasibility of such services.”
- “There is the potential impact on Cowfold village centre...” [discussed below]
- “Overall, the assessment... is balanced between the site promoter’s forward-thinking approach to sustainable travel on the one hand (albeit the take-up of such opportunities is uncertain), and the significant challenge of how to realistically and effectively achieve required mitigation measures at Cowfold...”

- West of Billingshurst:

- “In geographic terms, the land is not too distant from railway station. Existing bus stops enjoying a regular daily service (bus 100, hourly Monday-Saturday) are located in the village centre and railway station respectively, both up to a 20-25 minute walk for would-be future residents. Again, some limited information has been submitted to the Council as to how existing bus services could be enhanced to access the new development. Given the land is not located close to the existing bus 100 route, this may be difficult to achieve. A potential mobility hub and car clubs are suggested but no detail is provided as to how this could operate successfully. Access to the railway station would not appear convenient by walking or cycling and would also need to be significantly enhanced. Taking into account the presence of the A29 Billingshurst bypass and lack of direct (‘straight-line’) walking or cycling routes, the effective distance from the site to the railway station is considerable and may encourage additional car journeys to the station. The impact of this on the station car park will require further detailed investigation.”
- “Due to the significant challenges... stemming from the presence of the A29 bypass, and limited information provided to the Council in relation to transport assessment and mitigation, a very unfavourable impact is concluded at this stage.”

2.3.70. A further consideration is then recent transport modelling (June 2026), which flags a concern with a scenario involving allocation of both Adversane and Buck Barn:

“Overall, Scenario C represents the worst-performing scenario overall, as it combines the Adversane and Buck Barn developments. This results in the most widespread increases in demand, leading to higher junction V/C ratios, increased delays, and greater pressure on key corridors including the A29/A283, A24/A272, and within Horsham town centre. The cumulative nature of development in this scenario amplifies existing constraints and leads to more extensive network stress.

In contrast, Scenario A [Adversane only] performs best overall, as its impacts are more localised and primarily concentrated around the A29/A283 corridor and Horsham. While it does increase pressure at certain junctions, particularly those already operating close to capacity, the effects are more contained and less widespread across the network.

Scenario B [Buck Barn] and Scenario D [Adversane and West of Billingshurst] fall between these two extremes, with more corridor-specific or geographically focused impacts, but neither reaching the combined level of stress observed in Scenario C.”

2.3.71. With regards to the indicative shortlisted non-strategic omission sites (Scenarios 3 & 4), there is a ‘transport’ case to be made for several of these sites, including the site adjacent to Christ’s Hospital Station (notwithstanding the very low wider offer at village). Also, at Horsham the site within the NL benefits from good transport accessibility, with a bus stop located directly on Forest Road, served by several routes including services connecting Horsham, Crawley and wider destinations such as Gatwick Airport. At Storrington there is a need to consider traffic through the village centre and this is also the case at Henfield although the site in question here is modest in scale.

- 2.3.72. With regards to the 18 new proposed allocations that are held constant across the growth scenarios, there is a need to question the proposed increased proportion of growth allocated to lower order settlements, and several of the sites are challenging:
- Henfield – there is a need to carefully consider the transport merits of the proposed high growth strategy for Henfield, albeit the village benefits from hourly bus services to Brighton, Steyning, Horsham and Burgess Hill (also stopping at smaller settlements). Amongst other things, the submission SAR explained: *“Further assessment is required to ensure the local road network including the High Street could accommodate additional growth alongside the Neighbourhood Plan allocations...”*
 - East of Billingshurst extension – the submission SAR explained: *“The village centre and its facilities are approximately 2km away. However, the site lies within walking distance of the train station and the corresponding services and facilities which lie close to it, including shops, recreation ground and secondary school... The primary vehicular access would be taken off the A272 through the creation of a new Eastern Gateway. The site would offer cycle / pedestrian connections directly into the southern part of the village including pedestrianised green links.”* There is a need to confirm access proposals; however, it is understood that a benefit of the proposed extension (to the south of the railway) would be to deliver a new pedestrian footbridge over the railway in place of the current pedestrian level-crossing.
 - Billingshurst – *“The site has access onto the A272, but this does not have a pavement linking the site to the village centre for pedestrians. The site is within walking distance of bus services but via a road with no pavement.”* This issue could be addressed.
 - Southwater – *“access issues (i.e. whether access could be provided from the Mulberry Fields development to the immediate north) present uncertainty over whether development can be implemented or deliverable.”* This issue has been resolved.
 - Horsham – there is support for an intensified North Horsham scheme, albeit the scheme is no longer able to deliver a new rail station. The new proposed allocation to the east (within the NL) performs well in transport terms, with access from Crawley Road and an opportunity to improve connectivity with investment in infrastructure.
- 2.3.73. In conclusion, in line with the analysis from the submission SAR it is considered appropriate to conclude a preference for Buck Barn over Adversane in transport terms, although this is marginal noting that Adversane: A) is favoured by the transport modelling that has been completed to date (which would need to be followed by more detailed modelling as part of any planning application); B) would be a more compact settlement supportive of trip internalisation (it has been suggested that 80% of residents could be within a five minute walk of the village centre); C) is ~4km from a rail station and could be well linked by a new bus service (likely to be viable, but there are inherent uncertainties); and D) would safeguard land for a possible future rail station (which would need to follow line upgrades). Buck Barn is located on the A24 and in relative proximity to Horsham and Crawley, and transport appears to be at the heart of the scheme vision (subject to further scrutiny of what can be viability achieved and when). There would be good potential to cycle to Southwater whilst the potential to deliver upgrades to allow cycling from Adversane to Billingshurst are less clear.
- 2.3.74. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect. However at this stage it is considered appropriate to flag a ‘moderate or uncertain’ negative effect for Scenario 6 as a high growth scenario that would involve directing growth to two new settlements without rail connectivity. Also, there is a need to acknowledge that future local plan-making will be undertaken in the context of LGR and devolution such that there will be good potential to consider potential new settlements options from a perspective of supporting transport objectives.

Air pollution

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
		2	2		

- 2.3.75. At the time of submission a key issue was understood to be the Cowfold air quality management area (AQMA) located along the A272 to the east of Buck Barn. For example, the submission SAR explained:

“A range of [mitigation] measures have been explored. These included looking at increasing capacity on the A24 route to ‘draw’ traffic away from the A272; restrict the southern access to the site to bus and emergency vehicle access only; ‘gating’ traffic through Cowfold to relocate traffic queues to outside the village, or prioritising traffic flow on the A272 through Cowfold through changing the road layout in the village...”

- 2.3.76. However, the AQMA was recently revoked, such that there are reduced concerns from an air quality perspective. Nonetheless, traffic through Cowfold does remain a significant issue in the context of a potential new settlement at Buck Barn.
- 2.3.77. With regards to Adversane and West of Billingshurst there are no concerns regarding impacts to an AQMA, but there is a need to consider traffic through Pulborough.
- 2.3.78. Another consideration for all three strategic sites is then noise pollution from adjacent A-roads and, in the case of Adversane, an adjacent railway line. At Adversane there is a need to scrutinise the proposal for a focus of growth between the A29 and the railway line, and also the proposed locations of the two schools in terms of noise pollution.
- 2.3.79. With regards to the non-strategic sites that feature across the growth scenarios, the key consideration is the village centre AQMA at Storrington. Whilst noting that the draft Horsham District Air Quality Action Plan envisages the AQMA being revoked before 2030, it remains an area which suffers traffic congestion. Under Scenarios 3 and 4 numerous sites (submission allocations and new allocations) would lead to traffic through the AQMA (although at least one would have an alternative route to the A24).
- 2.3.80. With regards to significant effects, at submission the conclusion was that the plan would give rise to a “minor positive effect”. At this stage a neutral effect is predicted across the growth scenarios but there are some notable issues warranting further scrutiny.

Climate change

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

- 2.3.81. Focusing on per capita built environment decarbonisation (as transport is a focus of discussion elsewhere), at both of the new settlement options there is likely to be good potential to deliver net zero carbon development (in operation) and to a high standard, which primarily means delivered in line with the energy hierarchy. Any new settlement would likely be an ‘exemplar’ that is scrutinised from a decarbonisation perspective, albeit there would be competing masterplanning, design and infrastructure priorities. In particular, in respect of Buck Barn the submission SAR explained that the site promoter indicates considerable ambition (albeit proposals are always subject to change):²²

²² The updated SAR (2026) explains: “The most recent vision document is silent on exact proposals for net zero carbon.”

“The site promoter has set out a strong vision to achieve sustainable construction and has stated that all homes would be net zero carbon emissions over their lifetime, and would be carbon neutral in production.”

- 2.3.82. With regards to the non-strategic sites that feature across the growth scenarios, the key point to note is that the majority are likely to be associated with strong development viability (including given limited infrastructure dependencies relative to strategic sites) such that they are well-placed to deliver net zero development (in operation) without having to compromise on wider objectives, including affordable housing-related.
- 2.3.83. Having said this, it is noted that the proposal now (Main Mods) is to amend the development management (DM) policy relating to affordable housing such that there is a reduced requirement to deliver affordable housing on viability grounds.
- 2.3.84. Finally, with regards to climate change adaptation, the key issue here is over-heating risk (as flood risk is discussed above). There is limited potential to differentiate between the scenarios, but it can be noted that there is a case for supporting sites well placed to deliver onsite green infrastructure and which would involve retaining existing mature trees. As discussed, at Buck Barn there is an opportunity to deliver a new settlement that integrates closely with extensive green infrastructure.
- 2.3.85. In conclusion, there is a case for concluding support for higher growth given quite good potential for net zero developments, but on balance it is not possible to differentiate between the scenarios with confidence, including acknowledging the need to factor in transport decarbonisation alongside built environment decarbonisation.
- 2.3.86. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect, and a neutral effect is predicted at this stage. The Council has set a net zero target date in line with the national 2050 target, and it is difficult to conclude whether the proposed approach to growth is a positive or a negative in terms of influencing the decarbonisation trajectory required to achieve this target. Also, lower provision for unmet needs in Horsham could potentially lead to increased pressure for provision elsewhere at locations more distant from the source of the unmet need, with negative implications for transport and, in turn, decarbonisation objectives.

Economic growth

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
5	4	3	2	3	1

- 2.3.87. Employment land needs would be provided for under all scenarios, and the two new settlement options would deliver well-located new employment opportunities (including noting Brinsbury College adjacent to Adversane, and Buck Barn's position on the A24). Latest understanding is that Buck Barn would deliver more employment land than Adversane, namely 30,000 sqm compared to 12,000 sqm.
- 2.3.88. Overall, the order of preference reflects: A) support for new settlements that can deliver employment land/opportunities; B) support for growth well linked to sub-regional centres and the growth-constrained south coast (i.e. such that on balance there is a preference for Buck Barn over Adversane); and C) limited case for growth at Billingshurst.
- 2.3.89. With regards to significant effects, at submission the conclusion was that the plan would give rise to a significant positive effect. However, at this stage it is appropriate to predict a 'moderate or uncertain' positive effect, including because the matter of providing for sub-regional unmet needs has risen and continues to rise up the agenda.

Employment

Scenario 1 Adversane	Scenario 2 Buck Barn	Scenario 3 Adversane Non-strat.	Scenario 4 Buck Barn Non-strat.	Scenario 5 Buck Barn W. B'hurst	Scenario 6 Adversane Buck Barn
=	=	=	=	=	=

2.3.90. It is difficult to meaningfully comment on the merits of the growth scenarios over-and-above the comments made above under 'economic growth'. Focusing on the three strategic sites (none of the non-strategic sites would deliver significant new employment land, although there may be an opportunity to explore in respect of the option of a new allocation to the north east of Billingshurst, which is a variable across the scenarios):

- Adversane – the SAR concluded: *“The promoters seek to achieve the Council’s aspiration for one job per home. Although not wholly met they have identified where space for around 2,450 jobs would be provided... This includes the development of Kingswood Works, an office/industrial area to be located adjacent to the A29 on the west of the site. This area already has an unimplemented permission for such uses (but would need to be amended in order to bring in access for the rest of the site)... Overall favourable impacts are concluded.”* However, the latest situation is that the Kingswood Works will no longer come forward as part of the Adversane masterplan.
- Buck Barn – the SAR concluded: *“... there is the potential to achieve the aspiration of one job per home from both the new employment land and design of homes that takes into account increases in flexible home working and the opportunities presented by the employment and community uses on the site. Overall, it is considered that there would be favourable impacts arising from the development of this site.”*
- West of Billingshurst – *“Land at Platts roundabout, which forms the eastern entrance to the site has permission for a petrol filling station... with outline permission for 4,627sq.m of... employment space – this area is proposed as an employment / retail hub as part of the proposals. Some of this has commenced and a further outline application has been permitted. No new land is proposed as part of the scheme... Billingshurst has a number of existing employment sites and new employment land is being constructed on land opposite the northern parcel of this site...”*

2.3.91. With regards to significant effects, at submission the conclusion was that the plan would give rise to a mixed effect, and at this stage a neutral effect is predicted.

2.4. The preferred growth scenario

2.4.1. Officers provided the following text to explain why **Scenario 1** is 'justified':

The Council has considered carefully the options for delivering on a housing supply of at least 20,100 homes in line with the Local Plan Inspector’s letter dated 05 May 2026. It has taken account of updated evidence on infrastructure delivery, transport impacts, estimated rates of delivery and viability, and has updated its site assessment work in line with discussions held in examination hearings. It has, on balance, been concluded that a strategy which carries forward the submission plan spatial strategy, but also includes a new settlement development on land at Adversane together with additional small to medium site allocations aligning with the established settlement hierarchy, provides the best opportunity for sustainable and deliverable achievement of the required housing growth. This takes particular account of discussions with the local education authority, West Sussex County Council, which has highlighted the need for substantial expansion of secondary school education in the west part of the District. This can only be achieved through the allocation of a new strategic scale development at Adversane. Evidence has shown this to be a deliverable option whereby impacts can be mitigated, and which will bring wider placemaking and public benefits.

3. Appraisal of the main modifications

Introduction

- 3.1.1. The aim here is to present an appraisal of the proposed main modifications (Main Mods) that are currently published for consultation.
- 3.1.2. At the heart of the Main Mods is the proposed approach to boosting housing land supply, i.e. growth scenario 1 as appraised above, but there are also wider Main Mods to factor-in as part of the appraisal presented here.
- 3.1.3. Specifically, the focus here is a schedule of 264 Main Mods, but the aim is not to appraise each and every one of these in turn, because the focus must be on the *significant effects* of the Main Mods as a whole.
- 3.1.4. Numerous of the Main Mods give rise to little in the way of notable substantive implications, let alone significant effects (in isolation or in combination), for example because they involve factual updates, points of clarification, editorial changes (including moving text from one part of the plan to another) or necessary changes to align with national policy. Main Mods of this nature need not be a focus of appraisal.
- 3.1.5. In short, the focus is on Main Mods that reflect the outcome of a significant policy choice and, as a means of understanding the specific Main Mods that warrant being a focus, account can be taken of the summary presented in the 6th of July 2026 Cabinet Report:
 - Plan context – the Cabinet Report explains that: *“Many of [the Main Mods] are more factual in nature and reflect the changed context of the plan.”* In particular, a key contextual change is in respect of *“the changed position in relation to water neutrality”*, which is not a change that necessitates appraisal, because there is no policy choice.
 - Air quality – the Cabinet Report explains: *“The Council has undertaken a Habitat Regulations Assessment (HRA) to consider what if any impacts the plan... would have on the integrity on sites designated as Special Areas for Conservation (SAC’s) and Special Protection Areas (SPAs). It identifies that there may be potential in the latter part of the plan period for increased traffic flows to adversely impact the protected Mens woodland as a result of ammonia pollution. Updated modelling has taken place to consider the potential impact of further housing allocations. The technical note [HRA] set out in the Council’s evidence base confirms that the transport mitigation package proposed remains fit for purpose to mitigate this impact. Amendments to the supporting text have been proposed explaining that the Council will undertake further monitoring of vehicle journeys during the plan period.”* This is a matter that warrants discussion within the appraisal below, but there is little in the way of policy choice.
 - Economic development – the Cabinet Report explains: *“In addition to factual updates to reflect the interrelationship between the level of employment floor space required in light of the increased housing requirements, key proposed amendments have focussed around ensuring the policies provide businesses with sufficient flexibility, including clarification on business and commercial activities known as ‘E’ use classes, and have greater alignment with the positive approach in the NPPF. They also focus on ensuring sites are in accessible locations and policies have fewer restrictions to help minimise vacancies especially within the designated Key Employment Areas, reflect the range of business uses likely to be needed in Horsham District, and secure an increase in the employment land allocation at Graylands Estate.”* This is partly around aligning with national policy, but overall this is a matter that warrants appraisal.
 - Affordable housing & plan viability – this is a key matter that warrants being a focus of appraisal, as when establishing development management policy decisions must be made in respect of how to balance competing policy objectives within development viability parameters. Development viability is challenging nationally at the current time (albeit this can change over a plan period), and there is a need to avoid a situation whereby site allocations cannot deliver in line with the committed trajectory, or are not able to deliver in line with the approach envisaged in the Local Plan.

The decision made, in light of a recent Viability Study (2026), is to reduce requirements on developers in respect of providing affordable housing, with the headline being a new proposal (MM155) to reduce the requirement for affordable housing on non-strategic greenfield sites from 45% to 35% (also older persons accommodation is now excluded from providing or making a contribution to affordable housing). However, in theory there is the possibility of ‘flexing’ on wider policy requirements in order to create viability headroom that might then enable additional affordable housing. In this regard, the Viability Study (2026) explains:

“Those policy requirements that will have a direct cost to development have been reflected in the appraisals, including...: Biodiversity net gain; Accessibility standards; Water efficiency; Affordable housing; Infrastructure & developer contributions.”

- Housing requirement and housing supply – this is the key matter at the very heart of the Main Mods that warrants being a key focus of appraisal. Specifically, under each sustainability topic a key aim is to present a concise statement on the merits of growth scenario 1 as appraised in Section 2 (minimising repetition). Alongside this, an aim is to appraise proposed site-specific policies, as when preparing site-specific policies there is a need to make decisions in respect of how to balance competing objectives.

- 3.1.6. In summary, under each sustainability topic the aim is to appraise the Main Mods as a whole with a strict focus on significant effects. Finally, it should be noted that whilst a primary focus is on the proposed Main Mods, because it is only Main Mods that are the focus of consultation, the conclusions on significant effects also factor in wider aspects of the submission plan, i.e. reflect the plan as proposed to be modified.

Housing

Provide affordable, sustainable and decent housing to meet local needs.

- 3.1.7. The appraisal in Section 2 concludes a significant positive effect for growth scenario 1, but finds that there is a strong case to be made for alternative scenarios that would deliver higher growth, including scenarios with a stronger focus on non-strategic sites. It also finds that, from a housing perspective, there is a ‘housing’ case to be made for supporting a new settlement at Buck Barn in place of Adversane, because Buck Barn is better related to the key centres of population including the south coast towns.

- 3.1.8. Further key points to note from the appraisal in Section 2:

- The proposal to set the housing requirement significantly above local housing need over the plan period is very proactive, and there is also a robust supply ‘headroom’ over-and-above the housing requirement (to ensure the housing requirement can be delivered, with this particularly important in the early years of the plan period), but the proposal is for a heavily stepped requirement, such that there is a case for allocating additional smaller greenfield sites that might deliver earlier in the plan period.
- New proposed allocations are primarily greenfield sites, which is suggestive of stronger development viability and, in turn, greater ability to deliver on multiple policy asks, and some site promoters have suggested the possibility of delivering affordable housing at a rate over-and-above the policy requirement. There is also a good focus on sites in parts of the District where development viability is highest (as understood from the Viability Study, 2026), including Ashington and Henfield.
- There is merit to the proposed approach in terms of boosting supply in the south of the District where settlements are in relative proximity to the south coast towns where unmet need housing need is a major issue. In particular, there is a focus of growth at Henfield and Ashington, but also Storrington, Cowfold, Partridge Green and Small Dole. Also, there is support for one new proposed allocation at the eastern edge of Horsham (within the National Landscape) that is well-linked to Crawley.
- Several sites have pending planning applications, suggestive of early delivery.

- The proposal is to provide for locally arising Gypsy and Traveller accommodation needs in full, with a proposed modification to supporting text to the plan explaining: *“As of 1 June 2026, the Council had approved 35 pitches since the Gypsy and Traveller Accommodation Assessment had been conducted. Additional allocations collectively totalling 74 (net) pitches are also made, which are a mix of regularising or intensifying existing sites and through the allocation of new sites. Taken together, this amounts to 109 pitches, which ensures that assessed needs are met for both those who meet the planning definition and for ‘undetermined’ households in their entirety throughout the plan period, with a small headroom to ensure resilience in supply.”* Unmet need is a significant issue across the sub-region, but needs can be locally specific and there is no evidence to suggest a clear case for unmet needs being provided for in Horsham.²³

3.1.9. With regards to wider proposed modifications:

- As discussed, MM155 is a key modification that reduces requirements on developers in respect of affordable housing provision. 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.
- MM39 is an important proposed modification to Policy 3 (Settlement Expansion). Specifically, it proposes to delete the requirement that the expansion of existing settlements will only be supported where the site is allocated in the Local Plan or in a Neighbourhood Plan, and a similar change is also made to Policy 14 (Countryside Protection). This is with a view to aligning with the Draft NPPF (2025), and is supported in housing terms because it is supportive of windfall development, but this approach warrants scrutiny (subject to the final NPPF) with a view to a suitably plan led approach to growth under a scenario whereby the plan is being successfully implemented and the Council can demonstrate a five year housing land supply.
- MM38 relates to neighbourhood planning and is also of note. Specifically, new supporting text explains: *“... this plan is able to meet its own identified housing requirements in full, together with an additional quantum to help address unmet housing requirements elsewhere ... As this local plan meets identified housing need requirements, it is not considered that additional housing targets need to be ascribed to Neighbourhood Plan areas ... It is however recognised that local communities may wish to identify additional development sites through allocations in a review of their Neighbourhood Plans. This will help deliver further headroom for the plan period...”*

3.1.10. In conclusion, a **significant positive effect** is predicted, but there are clearly matters that warrant ongoing scrutiny through the Examination in Public.

Access to services and facilities

Maintain and improve access to centres of services and facilities including health centres and education

- #### 3.1.11. The appraisal in Section 2 concludes a ‘moderate or uncertain’ positive effect for growth scenario 1 and finds that it is the best performing of the scenarios appraised, particularly because it would involve a very strong focus on strategic allocations that are well-placed to deliver new school capacity (particularly secondary school capacity) alongside new homes, including with a view to addressing known capacity issues at Billingshurst.
- #### 3.1.12. Further key points to note from the appraisal in Section 2:
- Billingshurst and Henfield are second tier settlements set to see high growth over the plan period and where access to community infrastructure with capacity is a key issue.
 - With regards to primary school capacity there are not known to be any particular issues, in light of the IDP (2026), but this warrants ongoing scrutiny.
 - There are inherent uncertainties in respect of access to GP surgeries with capacity.

²³ For example, the Maidstone Local Plan (2024) generates in excess of 500 pitches unmet need and the follow-on local plan tasked with providing for these needs was recently withdrawn.

3.1.13. With regards to wider proposed modifications:

- At the West of Ifield submission strategic allocation there are new additional requirements in respect of delivering new schools capacity (MM194), with the following explanation: *“To reflect WSCC evidence that the provision of two primary schools, and also the provision of a 10-form entry secondary school, may be necessary in the longer term depending on precise mix of housing types and changing demographics.”*

3.1.14. In conclusion, a **‘moderate or uncertain’ positive effect** is predicted. 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.

Inclusive communities

Encourage social inclusion, strengthen community cohesion and a respect for diversity

3.1.15. The appraisal in Section 2 concludes a ‘moderate or uncertain’ negative effect for growth scenario 1 but finds it to perform on a par with the alternative scenarios. This reflects an understanding that the new proposed allocations will generate concerns amongst existing communities, with a particular concern in respect of high growth at Henfield.

3.1.16. Further key points to note from the appraisal in Section 2:

- There is confidence in the ability to deliver a high quality scheme at Adversane, but there remain matters for ongoing scrutiny including traffic through Pulborough.
- There is a need for ongoing consideration of the cumulative impacts of growth at a number of second and third tier settlements. It can also be noted that there are pending planning applications that are not proposed for allocation, which highlights the importance of progressing the plan to adoption as soon as possible.

3.1.17. With regards to wider proposed modifications:

- The proposal is to merge Policy 19 (Development Quality) and Policy 20 (Development Principles). This is considered likely to be appropriate from a perspective of ensuring concise policy, but the new detailed policy wording warrants ongoing scrutiny.
- Masterplans are proposed to be removed from the plan. On the one hand this is appropriate in terms of not wishing to unduly constrain the delivery of complex sites; however, the effect is to reduce certainty regarding what will come forward.
- At Ashington there is a requirement that development accords with a comprehensive site wide masterplan to *“ensure a co-ordinated approach to development across the entirety of the allocation and deliver an integrated and sustainable settlement form.”*
- At Lower Beeding there is a requirement for a “comprehensive development” across the two sites, including aimed at infrastructure delivery, but one of the sites is currently the subject of a pending planning application, which could create a challenge.

3.1.18. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. 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.

Crime

Support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced.

3.1.19. The appraisal in Section 2 concludes a neutral effect for growth scenario 1 and finds it to perform on a par with the alternative scenarios, explaining: *“It is difficult to meaningfully comment on the merits of the growth scenarios...”*

3.1.20. None of the wider proposed modifications are considered to give rise to significant implications for objectives relating to crime, and so a **neutral effect** is predicted.

Health & wellbeing

Improve public health and wellbeing and reduce health inequalities

- 3.1.21. The appraisal in Section 2 concludes a 'moderate or uncertain' positive effect for growth scenario 1 but finds that there is a case for alternative scenarios that see Adversane replaced with Buck Barn, because the latter scheme concept reflects a distinct vision focused on with green, community and active travel infrastructure. However, this conclusion is marginal, including because Adversane would involve a notably more compact new settlement supportive of walking and cycling to access the village centre.
- 3.1.22. Further key points to note from the appraisal in Section 2:
- Adversane is overall supported although there are inherent uncertainties in terms of delivering a new GP surgery and because it would be a compact new settlement supportive of walking and cycling, although there would be somewhat limited onsite greenspace (at least relative to the Buck Barn proposal) and it is not clear that there will be the potential to deliver a cycle link to Billingshurst.
 - Access to a GP surgery varies considerably across the suite of proposed allocations.
 - The proposed extension to Kilnwood Vale would support delivery of community infrastructure within Kilnwood Vale, although not necessarily a GP surgery.
- 3.1.23. With regards to wider proposed modifications, a number have modest positive implications but these are considered to be of limited significance. One point to note is proposed requirements for green / open space and facilities for sports and recreation:
- At Adversane the requirement is: *"Provision shall include (but not be limited to): i) a network of paths, integrating with existing public rights of way ii) accessible natural green space, including the retention of ancient and mature woodland; iii) allotments and community orchards; and iv) a sports hub consisting of 3G and grass pitches for a variety of sports, including football and cricket, with changing rooms, a pavilion..."*
 - At Barns Green the new proposed allocation must utilise the southern section of the site for open space and recreation.
 - At Partridge Green the requirement is that: *"Development is focused on the southern half of the site. The northern proportion of the site should be utilised for public open space and recreation use to aid the transition to the wider open countryside..."*
- 3.1.24. In conclusion, a **'moderate or uncertain' positive effect** is predicted. There is a need for ongoing scrutiny of the optimal locations for delivering new GP surgery capacity.

Biodiversity

Conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest

- 3.1.25. The appraisal in Section 2 concludes a 'moderate or uncertain' negative effect for growth scenario 1 but finds it to perform on a par with the alternative scenarios. There are widespread constraints to growth across the District, but lower growth in Horsham would risk pressure for higher growth elsewhere within a constrained sub-region.
- 3.1.26. Further key points to note from the appraisal in Section 2:
- Whilst Adversane is relatively close to the Mens SAC, functional links with the SAC are potentially limited or can likely be mitigated. There is limited onsite and adjacent constraint, and the constraints that exist (woodlands and stream corridors) are towards the edge of the site suggesting good potential for avoidance/mitigation.
 - A number of the other new proposed allocations are subject to significant or notable biodiversity constraint, perhaps most notably the proposed site south of Southwater.
- 3.1.27. With regards to wider proposed modifications:

- The key point to note is the proposal to reduce the requirement for biodiversity net gain (BNG) from 12% to 10%, where 10% is the national minimum requirement. This will assist with development viability, although only marginally.
 - There are also a number of wider proposed changes to policy text relating to biodiversity but of limited significance.
 - With regards to site-specific policies, whilst there are numerous references to ensuring a 15m buffer to ancient woodlands, this is a requirement that might alternatively be set out in a district-wide DM policy. In turn, the question is whether 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.
- 3.1.28. In conclusion, a **'moderate or uncertain' negative effect** is predicted. 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.

Landscape

Conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place

- 3.1.29. The appraisal in Section 2 concludes a 'moderate or uncertain' negative effect for growth scenario 1 but finds it to be the equal best-performing of the alternative scenarios. Again, whilst there are wide-spread constraints to growth across the District, it is also important to acknowledge that lower growth in Horsham would risk pressure for higher growth elsewhere within a constrained sub-region, and there is support for a focus of growth at Adversane where landscape constraint is relatively limited.
- 3.1.30. Further key points to note from the appraisal in Section 2:
- With regards to Adversane, the majority of the site has 'moderate' capacity, and whilst there is lower capacity at the northern and southern extents of the site, these sensitivities can likely be addressed to a good extent through masterplanning. It is also important to note the proposal for a distinctly compact new settlement.
 - A number of the new proposed non-strategic allocations were previously rejected partly or largely on the basis of landscape sensitivities. From a landscape perspective there is certainly a need to ensure a strategic approach to the expansion of Henfield.
- 3.1.31. With regards to wider proposed modifications:
- The proposal is to delete Policy 15 (Settlement Coalescence) and in Policy 13 (The Natural Environment and Landscape Character) the proposal is to replace the requirement to maintain settlement separation with a requirement to avoid "coalescence where it would erode that character and sense of place".
 - Policy wording is updated to reflect the duty to have regard to furthering the two purposes of the South Downs National Park, namely to conserve and enhance its natural beauty, wildlife and cultural heritage and to promote the opportunities for public understanding and enjoyment of its special qualities. In particular, within Policy 11 (Environmental Protection) there is a new requirement to "avoid adverse impacts on and protect the integrity of" the South Downs International Dark Sky Reserve.
 - With regards to site specific policies, there is a notable requirement for all proposed allocations at Storrington to submit a Landscape and Visual Impact Assessment (LVIA) as part of forthcoming planning applications, reflecting sensitivities including the SDNP.
 - At Storrington there is also the following targeted requirement: *"For STO1, STO3 and STO4 incorporate appropriate landscape buffers and boundary treatments to reduce any perceived settlement coalescence between Storrington and West Chiltington..."*

- At Kilnwood Vale there is also a targeted requirement for: “... *substantial structural landscaping along the southern and western boundaries... protect the setting of the High Weald; and maintain separation between Crawley, Horsham and Faygate...*”
- Similarly for the site west of Storrington (subject of a planning application): “Any proposal should be design and landscape-led with regard given to the setting of the South Downs National Park. The layout, density and form of development must provide a sensitive transition to the open countryside.”

- 3.1.32. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. 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.

Historic environment

Conserve and/or enhance the qualities, fabric, setting and accessibility of the District’s historic environment.

- 3.1.33. The appraisal in Section 2 concludes a ‘moderate or uncertain’ negative effect for growth scenario 1 but finds it to be the equal best-performing of the alternative scenarios. Whilst Adversane is subject to distinct and potentially significant constraint, in the form of the adjacent Adversane Conservation Area, there is good potential for mitigation and the alternative scenarios appraised would also involve sites subject to constraint.
- 3.1.34. Further key points to note from the appraisal in Section 2:
- At Adversane there are limited sensitivities other than in respect of the adjacent conservation area, and there is good potential to minimise impacts.
 - A number of the proposed non-strategic allocations are subject to a degree of constraint, perhaps most notably the proposed site at Rudgwick.
 - A submission site at Rusper is proposed for deletion on historic environment grounds.
- 3.1.35. With regards to wider proposed modifications:
- The proposal is to make a number of adjustments to Policy 21 (Heritage) but overall the proposed changes are of limited significance.
 - With regards to site specific policies, for numerous sites there is a requirement to have regard to specified historic environment assets / sensitivities, but policies are not prescriptive in terms of how this should be achieved, e.g. via targeted greenspace. The exception is Rudgwick: “*Regard should be given to the setting of designated heritage assets. Any proposal should implement a sensitively designed layout, incorporating lower densities, strategic planting, and separation distances.*”
- 3.1.36. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted. However, this is somewhat marginal given limited sensitivities across the suite of new proposed allocations and recalling the baseline scenario is one whereby growth continues at pace.

Soil quality

Make efficient use of the District’s land resources through the re-use of previously developed land and conserve its soils.

- 3.1.37. The appraisal in Section 2 concludes a ‘moderate or uncertain’ negative effect for growth scenario 1, because there would be a significant loss of best and most versatile (BMV) agricultural land, but suggests a case for higher growth scenarios that would involve a stronger focus on strategic allocations that are unlikely to comprise best and most versatile (BMV) agricultural land and recognising that the effect of higher growth in Horsham would be to reduce pressure for growth elsewhere in a constrained sub-region.
- 3.1.38. Further key points to note from the appraisal in Section 2:
- Adversane is provisionally understood to comprise grade 2b quality land (not BMV).

- The large proposed allocation at Ashington is provisionally grade 4 quality.
- Two new proposed sites (Horsham and Storrington) are provisionally grade 1 quality.

3.1.39. With regards to wider proposed modifications there are no significant implications.

3.1.40. In conclusion, a **'moderate or uncertain' negative effect** is predicted. There is significant higher quality agricultural land in the District but also areas of lower quality land, and the situation is similar across across the wider sub-region.

Natural resources

Conserve natural resources, including mineral resources in the District

3.1.41. The appraisal in Section 2 concludes a neutral negative effect for growth scenario 1 and finds the alternative scenarios to perform on a par, explaining: *"It is difficult to suggest significant issues for consideration under this heading that are not better considered under other headings... Much of the District is covered by a Minerals Safeguarding Area (MSA) for brick clay, but it is difficult to conclude that this is a significant constraint given the extent of the MSA."*

3.1.42. None of the wider proposed modifications are considered to give rise to significant implications for natural resources objectives, and so a **neutral effect** is predicted.

Water resources

Achieve sustainable water resource management and promote the quality of the District's waters.

3.1.43. The appraisal in Section 2 concludes a 'moderate or uncertain' negative effect for growth scenario 1 and is unable to reach a conclusion on whether the alternative scenarios perform any better or worse. There are inherent uncertainties in respect of both water supply and wastewater treatment, as is typically the case in the context of local plan-making in the constrained south of England.

3.1.44. None of the new proposed allocations are known to give rise to particular concerns in respect of water supply or wastewater treatment, but there is a need for ongoing scrutiny following consultation with the water companies and the Environment Agency.

3.1.45. With regards to wider proposed modifications:

- The key point to note is the proposal to re-write Policy 9 (Water Efficiency), with the new proposal to require developments to be designed so as to ensure no more than 110 litres of water use per person per day, which is in contrast to the requirement for 85 litres per person per day in the submission version of the policy. This change will assist with development viability but warrants ongoing scrutiny, notwithstanding that there is no longer a requirement to demonstrate water neutrality. Consideration might be given to a requirement of 100 litres per person per day, albeit acknowledging that the costs involved could have knock on implications for wider objectives.

3.1.46. In conclusion, a **'moderate or uncertain' negative effect** is predicted. 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.

Flooding

Manage and reduce the risk of flooding

3.1.47. The appraisal in Section 2 concludes a 'moderate or uncertain' negative effect for growth scenario 1 but the alternative scenarios perform on a par. A number of the submission and new proposed allocations are subject to a degree of flood risk, and whilst in most cases there is clear potential to avoid or address flood risk in practice, it is appropriate to flag a degree of residual risk ahead of consultation with the Environment Agency.

3.1.48. Further key points to note from the appraisal in Section 2:

- Adversane is subject to a degree of surface water flood risk but overall there is understood to be good potential to avoid issues and perhaps achieve a betterment.
- Several of the new proposed non-strategic allocations are subject to a degree of flood risk but the Council has examined in detail the potential to avoid/mitigate this risk. The site west of Storrington is notably subject to extensive groundwater flood risk.

3.1.49. With regards to wider proposed modifications the key point to note is a proposal to re-write Policy 10 (Flooding) but the proposed changes are of limited significance.

3.1.50. In conclusion, a **'moderate or uncertain' negative effect** is predicted. This is a precautionary conclusion ahead of consultation with the Environment Agency.

Transport

Reduce congestion and the need to travel by private vehicle in the District

3.1.51. The appraisal in Section 2 concludes a neutral effect for growth scenario 1 and concludes that, whilst there is a strong case to be made against the higher growth scenarios appraised, there is a transport case to be made for supporting Buck Barn in place of Adversane. This reflects the location of Buck Barn on the A24 and in relative proximity to key sub-regional centres; however, this conclusion is marginal including because Adversane would involve a notably more compact new settlement and there would be good proximity and connectivity to the railway station at Billingshurst.

3.1.52. Further key points to note from the appraisal in Section 2:

- Adversane is shown to perform reasonably well through transport modelling, but there will be a need for further work to consider detailed road links and junctions, including within Pulborough. The site benefits from relative proximity to a rail station, it is expected that a new bus service can be delivered, and as a compact new settlement there will be good potential for trip internalisation, but there is no clear proposal for a cycle link to Billingshurst. The proposal is also to deliver a new and improved junction linking the A29 and the B2133 that will allow for the current level crossing to be closed and, finally, the proposal is to safeguard land for a possible future rail station.
- There is a need to carefully consider the transport merits of the proposed high growth strategy for Henfield, albeit the village benefits from hourly bus services to Brighton, Steyning, Horsham and Burgess Hill (also stopping at smaller settlements). Traffic passing through the historic high street is also an important consideration.
- Cowfold and Partridge Green are notable as rural third tier settlements proposed for significant growth, although Cowfold benefits from linking to two A-roads.

3.1.53. With regards to wider proposed modifications:

- Travel plans are a requirement for some allocations, and there is a new requirement any travel plans to include a monitoring framework and review mechanism.
- New supporting text is proposed to state: *"Where the LCWIP [Local Cycling and Walking Infrastructure Plan] networks provide potential links to a development, the applicant should contribute to delivering or improving that part of the network."*
- The following is a notable requirement at Adversane: *"Measures which can help address not just the impacts of the development itself, but also address wider congestion issues on the A29 corridor would also be expected. This includes at the Pulborough mini-roundabouts at Church Hill where the A29 and A283 meet."*
- There are targeted requirements for a number of sites, for example at: Southwater (*"... safe, direct pedestrian and cycle connections back into Southwater village"*); Kilnwood Vale (*"... land is safeguarded to facilitate the future provision of the Crawley Western Multi-Modal Corridor as shown on the Policies Map"*); and Storrington (*"... supported by a travel plan... improvements to bus, cycling and pedestrian infrastructure"*).

- 3.1.54. In conclusion, a **neutral effect** is predicted. 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.

Air pollution

Limit air pollution in the District and ensure lasting improvements in air quality

- 3.1.55. The appraisal in Section 2 concludes a neutral effect for growth scenario 1 and finds that it is equal best performing. The alternative scenarios that perform less well are those where (it is assumed) there would be additional non-strategic allocations at Storrington.
- 3.1.56. Further key points to note from the appraisal in Section 2:
- The key issue is growth at Storrington, where there is a designated AQMA.
 - Another consideration is noise pollution as a masterplanning issue at Adversane.
- 3.1.57. With regards to wider proposed modifications:
- Policy 11 (Environmental Protection) is proposed to be strengthened to such that the requirement is to “ensure no unacceptable impacts” resulting from air pollution.
 - In respect of the key issue of air pollution affecting the Mens SAC, new text explains:
“The Horsham and Chichester Local Plans Air Quality Strategy (AECOM, September 2024) sets out actions to ensure there is no adverse effect on the integrity of The Mens SAC, especially from ammonia pollution. The Council will monitor emissions on the A272 at the Mens SAC. Horsham and Chichester District Councils will use Automatic Number Plate Recognition (ANPR) monitoring on the A272, passing The Mens SAC, to track how many ultra-low emission vehicles (ULEVs) are being used over time. Should it become evident through monitoring that emissions arising from vehicle movements from proposed developments, individually or in combination, are likely without mitigation to affect the integrity of the SAC, the Council will seek mitigation measures through conditions and/or planning obligations attached to planning permissions. This will be in addition to the mitigation measures already specified in the Local Plan in respect of development East of Billingshurst. The councils will also keep working with Natural England and other groups to explore other mitigation options.”
 - At Kilnwood Vale there is a requirement for: *“Mitigation of noise impacts arising from the A264, railway line and aircraft operations including through layout, orientation, and design measures.”*
- 3.1.58. In conclusion, a **neutral effect** is predicted. 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.

Climate change

Minimise contribution to climate change and adapt to unavoidable climate change

- 3.1.59. The appraisal in Section 2 concludes a neutral effect for growth scenario 1 and finds the alternative scenarios to perform on a par. 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.
- 3.1.60. Further key points to note from the appraisal in Section 2:
- The proposed strategy of focusing growth at strategic sites and non-strategic sites likely to benefit from strong development viability should afford the opportunity to take an ambitious approach to built environment decarbonisation, i.e. for standards to be achieved that go beyond the minimum requirements set out in Building Regulations.

3.1.61. With regards to wider proposed modifications:

- There are significant changes to DM policy that remove the emphasis on developers aiming to go further than minimum national requirements in terms of built environment decarbonisation. This reflects the direction of travel in the Draft NPPF (2025), but over recent years it has been common practice for Local Plans (emerging or adopted) to require net zero carbon developments (and to specify how net zero carbon is achieved, in terms of taking steps in accordance with the energy hierarchy).
- In particular, it is notable that the requirement for the four submission strategic allocations to deliver net zero carbon development is proposed to be deleted. Whilst this may be necessary on viability grounds, including recognising that strategic schemes can face viability challenges due to the costs of infrastructure delivery, strategic scale schemes can be masterplanned and designed with energy infrastructure in mind that is supportive of built environment decarbonisation.
- At Adversane supporting text states: *“All stages and elements of the development will be designed to achieve zero-carbon living...”*
- The proposal is to remove the requirement for applicants to submit a Sustainability Statement. Whilst this may be appropriate, there is a need to ensure that those who scrutinise applications can easily access information on energy/carbon performance.

3.1.62. In conclusion, a **neutral effect** is predicted. The Council has set a net zero target date in line with the national 2050 target, and it is difficult to conclude whether the Main Mods are a positive or a negative in terms of achieving the required decarbonisation trajectory.

Economic growth and employment (merged topics)

Facilitate a sustainable and growing economy; Deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District

3.1.63. The appraisal in Section 2 concludes a ‘moderate or uncertain’ positive effect for growth scenario 1 but finds that there is a case to be made for supporting Buck Barn, either in place of Adversane or in combination, as it could deliver well-located employment land.

3.1.64. Further key points to note from the appraisal in Section 2:

- Adversane can deliver well targeted new employment land, but this will be fairly small scale and of limited significance. There would, however, be a good synergy with education and skills development objectives given adjacent Brinsbury College.
- Other sites will not deliver significant employment land but there is support for boosting housing delivery in the District with a view to supporting the sub-regional economy.

3.1.65. With regards to wider proposed modifications:

- There are a range of proposed modifications, which are summarised above as focusing on: A) ensuring the policies provide businesses with sufficient flexibility, including clarification on business and commercial activities known as ‘E’ use classes, and have greater alignment with the positive approach in the NPPF; B) ensuring sites are in accessible locations and policies have fewer restrictions to help minimise vacancies especially within the designated Key Employment Areas; C) reflecting the range of business uses likely to be needed in Horsham District (there is a need for sites that allow flexibility to move between employment use classes); and D) securing an increase in the employment land allocation at Graylands Estate.

3.1.66. In conclusion, a **‘moderate or uncertain’ positive effect** is predicted. 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.

Appraisal conclusion

- 3.1.67. 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.
- 3.1.68. 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 the Local Plan would relieve pressure for growth elsewhere.
- 3.1.69. 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).
- 3.1.70. 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.

4. Next steps

- 4.1.1. Following consultation on Main Modifications the intention is to hold further hearing sessions, overseen by the appointed Planning Inspector. Subsequently the Inspector may be in a position to report on the soundness and legal compliance of the Local Plan or, alternatively, there could be a need for a further consultation.

