



Hearing Statement
Matter 5a: The Spatial Strategy and Site Selection

Horsham Local Plan - Examination in Public

On behalf of Reside Holdings Ltd
(Response IDs 1194238 & 66716833)

1. Introduction

- 1.1 This Hearing Statement is prepared on behalf of Reside Holdings in relation to the response to 'Matter 5: The Spatial Strategy and site selection' and the issues identified in the draft Hearing Agenda, namely:
- Whether the spatial strategy is an appropriate spatial response to housing need in the District (and adjacent districts), with particular regard to the settlement hierarchy and access to appropriate services and facilities;
 - Whether the distribution of development is sound having regard to constraints; and
 - Whether the range of sizes and types of site would meet the different housing needs, and enough homes would come forward at the right time to meet the requirement.
- 1.2 As set out in the Inspectors Guidance Note, the Horsham Local Plan is being examined under the transitional arrangements and as such, the NPPF December 2023.
- 1.3 Following initial hearings earlier this year, the Inspector provided initial findings (IDJB05), in summary requiring:
- Housing needs to be met in full (as calculated at the time of the NPPF 2023);
 - Half of Crawley's unmet needs to be met through the Plan;
 - A contribution to be made to unmet housing needs of the south coast.
- 1.4 The Council consulted on a number of Main Modifications to the Plan in July/August 2026, these included a range of policies to meet housing needs in full, 50% of Crawley's unmet housing need and a modest contribution towards the unmet housing needs of Worthing and Adur. As such, the Council have proposed a number of further site allocations.
- 1.5 This further set of hearings is intended to focus on strategic matters, including the spatial strategy and larger site allocations. On behalf of Reside Holdings, this Hearing Statement addresses the agenda items set out in relation to Matter 5: The Spatial Strategy and site selection and should be read in combination with representations made at Regulation 19 stage, our previous Hearing Statements and representations made in relation to the Main Modifications consultation.

2. Matter 5: The Spatial Strategy and site selection

Spatial distribution: whether the plan's proposed distribution of development is an appropriate spatial response to:

- **housing need in the District and in adjacent districts**
- **the settlement hierarchy and settlement character**
- **access to employment, social and community facilities and the objective of reducing the need to travel**
- **the highway network**
- **the rail network public transport and active travel**

- 2.1 The Local Plan now seeks to meet the District's housing needs in full, as well as 50% of Crawley's unmet need (the remaining 50% being delivered by Mid Sussex) and a small contribution of 52dpa towards the unmet needs of Worthing and Adur. It does not seek to meet the unmet needs of other south coast authorities, despite these unmet needs being significant – the SA Addendum 2026 estimating that this is likely to be in the order of 2,000dpa. As set out in our response to the Main Modifications consultation, we do not believe the Council have gone far enough, and the Council's own evidence base identifies that there is a case for higher growth.
- 2.2 The SA Addendum 2026 considers a number of growth scenarios, including two scenarios (3 and 4) that would include a number of further 'omission' sites, it concludes that there is a need to be 'open to a higher figure. Importantly, those scenarios provide a mechanism for increasing supply in the earlier years of the Plan and adding headroom against delivery risk. This is particularly relevant given the Plan's reliance on large strategic sites and new settlement-scale development, which are inherently dependent upon substantial infrastructure and are expected to make a greater contribution later in the Plan period.
- 2.3 Through the Main Modifications process, HDC have introduced a significant shift in the spatial strategy, introducing a new settlement proposal at Adversane. Whilst we acknowledge that in principle, such opportunities should be explored, we are surprised that the Council has radically changed the spatial strategy at this late stage in the Plan process, when there are other, more sustainable sites opportunities available to the Council for consideration, which are also identified within the SA Addendum and are in accordance with the spatial strategy in the submission version of the Local Plan.

- 2.4 There remain material uncertainties around the identification and delivery of Adversane, including its relative remoteness from existing services and facilities, public transport accessibility and the capacity of the surrounding highway network. Those uncertainties are relevant not only to the merits of the allocation itself, but also to the degree of reliance that can reasonably be placed upon its contribution to the housing trajectory.
- 2.5 The new allocation at Adversane will rely heavily on the settlement of Billingshurst, despite being physically and functionally separated from it. Those needing to utilise the services and facilities in Billingshurst will be reliant on the private car. However, there are sites on the edge of Billingshurst, including land at Hilland Farm, which are immediately adjacent, and well related to, the built-up area and are now surrounded by permitted development. Such sites are within walking distance of the services and facilities within Billingshurst, and future residents have a choice of sustainable transport measures, reducing the need to drive.
- 2.6 Furthermore, it is notable that West Sussex County Council, as the Highways Authority have responded to the Main Modifications, noting that the allocation of Adversane is not sound as it does not currently accord with the transport evidence, particularly a highways safety study. In particular their representation states that enhancements are required at Church Hill in Pulborough, would have proved difficult to design and implement:

“It is recognised that this site will generate additional traffic flow on the A29 route, which is presently constrained by the impact of a serious land movement at Church Hill in Pulborough, and that it has, so far, proved difficult to determine an acceptable design and implementation plan to restore the road corridor to its full two way working in terms of vehicular capacity and pedestrian provisions. Therefore, while this uncertainty remains over the long-term capacity of the A29, additional transport provisions will be required regarding potential impacts at - and on routes avoiding – Pulborough”

- 2.7 As set out in our response to the main modification consultation, we also remain concerned that the land at Adversane requires a new railway crossing. The discussions regarding the viability of the proposed crossing does not appear advanced, this has two challenges. Firstly, as set out in our earlier submissions, there is no certainty that the proposal is deliverable, this is significant and puts at risk the Council’s spatial strategy and associated housing delivery. Secondly, if the proposals are not significantly advanced, it is not possible to say whether this is viable or deliverable, which again puts the delivery of the project at risk or raises a question over the viability of the overall scheme. This is despite other opportunities being available to the Council for identification.

- 2.8 It is clear therefore, that the significant change in the spatial strategy has not been properly thought through or evidenced and therefore it is not sound. Furthermore, the highways implications arising from the development, including the need for a railway crossing, puts at risk the overall delivery of the project but as a minimum, the trajectory proposed by the Council. It will therefore do very little to meet housing needs, particularly in the initial periods of the Local Plan. As such, there is further evidence that a range of small and medium sized sites should be allocated to meet this shortfall. In particular, those identified as omission sites in the SA Addendum could be allocated without significant further work.

Housing delivery: whether the range of sizes and types of site would ensure that:

- **different housing needs and aspirations would be adequately met**
- **enough homes would come forward at the right time during the plan period to meet the housing requirement**

- 2.9 We remain concerned that the Council are relying heavily on large strategic sites to deliver the majority of the housing requirement, our full representations on this matter having been set out in previous Hearing Statements and our main modification representations. We recognise the constraint of water neutrality was largely outside the Council's control, however, it has had the effect of constraining housing delivery for a sustained period, this means that housing needs have not been met for some time, with the Council's latest Housing Delivery Test Result 2025 being only 44%, which can only be described as a significant shortfall. Therefore, there is a need for housing now, in the initial part of the Plan period, not in the latter stages of the Plan and the Council should and could do more to deliver a number of smaller sites, particularly those on the edges of the most sustainable settlements, where positive pre-application engagement has already taken place.

- 2.10 The Inspector's Interim Findings (IDJB05) states that:

The Council will critically reassess known sites using an appropriate methodology (likely based on the methodology recently developed by Mid Sussex) 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.

And

Housing delivery rates were low during the first years of the plan period owing to the restrictions imposed by the issue of water neutrality. The restriction has now been lifted but

delivery is predicted to remain subdued until new permissions begin to be implemented. This will require a stepped housing trajectory with a substantial rise in the annual average requirement from year 8 of the plan.

- 2.11 Despite this, the Council have continued to place significant reliance on large sites, when we believe that more should be done to identify a greater proportion of small and medium sized development, to deliver in the short term.
- 2.12 The submitted Local Plan includes three large strategic site allocations – the land west of Ifield, North West Southwater and East of Billingshurst and proposes further expansion of the land North of Horsham (which remains in the early stages), delivering c.3,000 homes in the plan period, in addition to the existing strategic sites at Kilnwood Vale and North Horsham. Through the Main Modifications, the Council have introduced a new strategic site allocation at Adversane and have proposed the expansion or increase in planned supply from the existing identified strategic sites, totalling a further c.3,300 units from large strategic sites. Furthermore, the Council recognise that the delivery of Adversane is the first time ‘in living history’ that Horsham has delivered a new settlement, it is therefore unknown territory.
- 2.13 We question whether the increase proposed is realistic and deliverable and it places further reliance on a small number of large sites to deliver the housing requirement. Furthermore, the increase in supply from large strategic sites will have no effect on increasing housing land supply in the short or medium term.
- 2.14 There are sites in the District, which have been promoted to the Council, which are medium sized sites, capable of delivering now. As an example, the land at Hilland Farm, Billingshurst, has been subject of positive pre-application discussions, and is ‘application ready’, with a full suite of technical site assessment and public consultation having been undertaken. It is identified as an omission site in the Council’s SA Addendum, yet it has not been allocated, this is despite it being capable of delivering within the short term.
- 2.15 At paragraph 2.3.10 of the SA Addendum it states

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.

- 2.16 Clearly, the SA Addendum recognises that the inclusion of omission sites (Scenarios 3 and 4) would have the benefit of boosting supply in the early part of the plan period and are likely to be more viable and ensure the delivery of the full policy quota of affordable housing. It states that delivery north-east of Billingshurst (a direct reference to the land at Hilland Farm) could be challenging, noting that pylons separate the site from the existing settlement. However, Reside undertook pre-application discussion with HDC in February 2026, and whilst some detailed design comments were raised, it was concluded that the proposal was acceptable in principle. Furthermore, whilst the pylons are between the site and the settlement, this does not act as a barrier, and indeed Billingshurst Business Park and further permitted residential development is to the north of the site, meaning that the land at Hilland Farm is now an 'infill site'.
- 2.17 The SA Addendum does not place any greater weight on the ability of sites to deliver in the short term, despite this being of critical importance to the delivery of new homes, particularly in light of the constraints of water neutrality. The Housing Delivery Study (HDS) 2026 identified that in the first 5 years of the plan, housing completions will average 582 dpa, identifying 'pent-up demand'. Had the Council given greater weight to the need to meet this pent-up demand, then smaller sites including those identified as omission sites through Scenarios 3 and 4, would have scored more highly therefore resulting in their site allocation.
- 2.18 In our view, the plan continues to place too much reliance on large strategic sites with insufficient supply of small and medium sized sites which are capable of being delivered in the short term, to deliver against a shortage in supply over recent years.

3. Summary

- 3.1 We welcome the Council's Main Modifications to the Local Plan insofar as they seek to meet Horsham's housing needs in full and 50% of the unmet needs of Crawley. We also welcome the contribution towards the unmet needs of south coast authorities. However, the central soundness issue remains whether the modified spatial strategy provides a sufficiently balanced and resilient portfolio of sites to ensure that the housing requirement is delivered at the right time.
- 3.2 We are concerned that the Plan continues to place significant reliance on large strategic sites including the introduction of a new settlement proposal. Whilst there is merit in planning for large scale development, these are typically slow to deliver and do not offer choice in the market. This means that housing delivery is towards the latter part of the plan period.
- 3.3 The legacy of water neutrality makes this particularly important. Delivery has been constrained for a sustained period and the Council's evidence anticipates subdued delivery before a substantial step-up later in the Plan period. The Council's own SA identifies additional smaller allocations as a means of boosting early supply, reducing the extent of the stepped trajectory and providing contingency against delivery risk. The SA Addendum supporting the Main Modifications identifies a number of omission sites and recognises that these could contribute towards meeting housing needs in the short term. We therefore submit that these sites should be allocated, providing resilience in planned supply and ensuring that homes are delivered in the early years of the plan.

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