

Horsham District Council's response to Inspector's question IDJB11

Monday 19 October 2026

- 1 The Inspector has raised a question about secondary school capacity in the Billingshurst school planning area, and whether there would be sufficient capacity to accommodate commitments and growth proposed in the Horsham District Local Plan (HDLP) without the Adversane allocation. This statement has been submitted by Horsham District Council (HDC), with input from and agreed by West Sussex County Council (WSCC) as the local education authority (LEA).
- 2 There are three secondary school planning areas in Horsham District: Billingshurst, Horsham and Steyning/Storrington. The Weald school is the only secondary school within the Billingshurst school planning area. WSCC's Planning School Places (PSP) 2026 uses year 7 intake to assess school place capacity for transitioning-planning between primary and secondary schools. It is therefore not an appropriate measure to assess school place capacity when planning for housing development.
- 3 The next nearest schools after The Weald are, as the crow flies, approximately:
 - 7 miles to Tanbridge House
 - 8 miles to The Forest Millais
 - 9 miles to Steyning Grammar
 - 12 miles to Midhurst Rother College
- 4 The PSP document indicates that The Weald has no surplus year 7 capacity between 2026 and 2034 taking into account existing commitments (at the time of data prepared for the published PSP in 2025) as shown in the Billingshurst Secondary forecast table on page 74 of the PSP 2026 in the Billingshurst school planning area. The PSP document indicates there would then be capacity after this date¹. This capacity is however limited given that a minimum 5% surplus is generally recommended to ensure sufficient flexibility within the school system. National Audit Office report on Capital Funding for new school places published in 2013 states:

"It considered that on average 5 per cent was the bare minimum needed for authorities to meet their statutory duty with operational flexibility, while enabling parents to have some choice of schools".

¹ (10% in 2034 and 15% in 2035)

- 5 As set out in hearings into Matters 5a and 5b, the Council's starting point for the Main Modifications has been to identify sites in addition to submission sites in order to meet the higher housing requirement, rather than a wholesale change to the spatial strategy. This includes 650 units at Land East of Billingshurst and other smaller site allocations in the Billingshurst school planning area.
- 6 In preparing the Main Modifications, the Council engaged with WSCC, as the LEA, regarding the potential education infrastructure implications of meeting a housing requirement of 20,100 dwellings or more. WSCC were invited to comment on development scenarios, in order to ensure any proposed development would be mitigated appropriately. The outcome of these discussions has led Horsham District Council to conclude that a scenario involving this level of growth would *in planning policy terms*, necessitate provision equivalent to three additional secondary schools in the District to provide sufficient certainty of school places for children locally during the plan period, taking account of the need for flexibility to accommodate all forms of additional growth (e.g. windfall development) during the plan period, and a need to ensure families have a genuinely local choice of schools.
- 7 West of Ifield and Land North West of Southwater, as site allocations in the Submission HDLP, each propose to deliver a secondary school and so the HDC has considered that a third secondary school would be necessary to support the proposed Main Modifications which meet or exceed the supply figure set out above.
- 8 Further development east of Billingshurst, on land south of the railway line, has the potential to add a further 350 units to the Plan's housing supply. However, engagement with the LEA indicated that further growth in the Billingshurst school planning area, including further allocations on the edge of Billingshurst and the addition of smaller sites, would generate the need for further secondary school places at The Weald, where scope for further expansion beyond the current 10 forms of entry has not been demonstrated and is at best limited. HDC has, therefore, considered that without an additional school in the Billingshurst area the LEA could object to future development which would otherwise be acceptable in planning terms.
- 9 The Council's position is, therefore, that the allocation of Land at Adversane addresses the demand for secondary school places generated by the new settlement itself, but also helps address future capacity issues arising from Local Plan growth in the school planning area which includes one of the District's most sustainable settlements. The WSCC's response to Inspector's Question Ref IDJB11 sets out that factoring in other allocations in the emerging local plan (but excluding Adversane), current capacity and existing housing commitments, the advised 5% capacity buffer is reached in 2035/2036 and this buffer continues to decrease to the end of the plan period and the planning area is considered to be full.
- 10 The allocation of a strategic site as an alternative to Adversane would require further strategic modelling by WSCC in order to consider any change in overall strategy of development and their impacts on

school place planning, rather than a like-for-like replacement of the proposed homes and secondary school provision. WSCC has previously advised the Council when invited to comment on development scenarios, with the locations and level of development proposed, they would not support three secondary schools being delivered all within close proximity to Horsham particularly on both Land North West of Southwater and on the omission site, Land at Buck Barn. This arrangement would also likely involve students from the Billingshurst School Planning Area being bussed to schools out of the Billingshurst School Planning Area.

- 11 Beyond the advice of the WSCC there are wider planning considerations which the Council has taken into account when considering the potential location of an additional school. In particular, there are clear educational synergies in locating a new secondary school close to the existing educational facility at Brinsbury College.