

CPRE SUSSEX RESPONSE TO MM227

Strategic Policy HA(NP1): Land at Adversane (Kingswood)

Summary

MM227 is unsound because HDC has not demonstrated, through proportionate evidence and adequate consideration of reasonable alternatives, that the late introduction of a stand-alone new settlement, envisaged 'as fully fledged small town' of at least 3,200 homes at Adversane, in close proximity to the existing small town of Billingshurst, represents a justified and effective long-term spatial strategy.

Only 1,425 of the proposed 3,200 homes are expected within the plan period. Most of the settlement, and any subsequent expansion, would therefore be delivered through future plans. Yet the fundamental decision to establish the settlement and its basic spatial structure would be made through a Main Modification introduced late in the examination, as an 'additional allocation to ensure the plan can meet increased housing targets following the withdrawal of water neutrality'.

The implications should be considered over three timescales:

- **Short term:** Adversane provides little assistance with HDC's immediate housing-delivery difficulties and five-year supply.
- **Medium term:** delivery depends upon an interdependent programme of housing sales, infrastructure, schools, utilities, employment and community facilities, with consequences for viability and affordable housing if assumptions are not achieved.
- **Long term:** establishing Adversane commits the District to a new settlement whose majority would be built after 2040 and whose potential future expansion has not been strategically assessed through the Plan now being examined.

HDC's Sustainability Appraisal does not establish Adversane as clearly superior overall to Buck Barn. Indeed, the SA expressly states that its appraisal "does not aim to reach a conclusion on which scenario performs best overall" and identifies both the Adversane and Buck Barn scenarios as potentially performing well overall (HDCJB13, Non-Technical Summary, p. ii; paras 2.3.3-2.3.4). It concludes that Buck Barn is marginally preferable in transport terms (para 2.3.73) and also records a preference for Buck Barn over Adversane under economic growth (para 2.3.88). Other considerations favour Adversane, while on several objectives the alternatives cannot clearly be differentiated.

1. An exceptionally consequential decision made exceptionally late

Adversane is not a conventional additional housing allocation. MM227 would establish the first new settlement in Horsham District in living memory, comprising at least 3,200 homes together with employment, schools, shops, healthcare, community facilities and major transport and utility infrastructure.

The allocation was not part of the submitted spatial strategy. It was introduced only at Main Modifications stage following the Inspector's requirement for additional housing.

New settlements can offer advantages through comprehensive planning and coordinated infrastructure, but those advantages depend fundamentally upon **selecting the right location and planning it over an appropriate long-term horizon.**

This is therefore not simply a decision about accommodating 1,425 homes before 2040. It establishes the location and basic structure of a town whose development will continue well beyond this Plan and may subsequently expand further. The evidence supporting a decision of this permanence should be correspondingly robust.

2. Short term: Adversane does little to address Horsham's immediate delivery problem

HDC's housing strategy must recover from exceptionally low recent delivery and establish and maintain a reliable housing pipeline.

Adversane provides little assistance during the period of greatest vulnerability. HDC's Housing Delivery Study considers initial completions in 2030/31 more realistic than the promoter's trajectory and concludes, on a more cautious basis, that 1,425 homes could be delivered by 2040 (HDCJB20, paras 3.114-3.115).

This should be considered alongside CPRE Sussex's representation on MM142. The Plan identifies a minimum housing requirement of 18,712 homes and proposed supply of 20,915, providing numerical headroom of 2,203 homes. Adversane's 1,425 plan-period contribution represents approximately 65% of that headroom (MM142 and MM227).

This is particularly significant because HDC's own SA states that "a robust headroom is crucially important over the early years of the plan period", whereas Adversane is not expected to begin delivering until 2030/31 (HDCJB13, Non-Technical Summary, p. ii; HDCJB20, para 3.115).

Without Adversane, the proposed supply would still amount to approximately 19,490 homes—778 above the minimum requirement. Adversane is therefore important principally as contingency against under-delivery, rather than because its contribution is indispensable to meeting the underlying requirement.

There is an inherent weakness in concentrating most of the Plan's numerical contingency against delay and slippage in a new strategic site which itself has a long lead-in and substantial delivery dependencies.

As set out in our MM142 representation, HDC should demonstrate whether greater resilience could be obtained through earlier delivery from established allocations and through a more diversified portfolio of deliverable sites.

3. Medium term: delivery depends upon interdependent assumptions

Recent HDC studies provide additional evidence on a number of infrastructure issues. The remaining soundness concern is the **combined sequencing and interdependence** of the proposed settlement.

Successful delivery depends upon sufficient housing completions and sales to support infrastructure; timely transport and utility provision; schools and community facilities being available at appropriate stages; employment and commercial development creating a genuinely mixed settlement; and sustainable transport assumptions being realised.

HDC's Housing Delivery Study recognises the potential for overlap between Adversane and other strategic sites around Billingshurst to reduce build-out rates. It concludes that the West sub-area will need completions to remain near the historical peak and stock growth well above historical levels, describing this as challenging (HDCJB20, paras 3.114 and 4.41).

The sustainability benefits claimed for a new settlement depend upon these components progressing together. Delay or under-performance in one may affect the viability and effectiveness of others.

Affordable housing

MM227 requires a minimum 35% affordable housing, and HDC's current viability evidence tests the scheme on that basis (MM227; HDCJB16).

However, this forms part of a development model extending over many years and carrying substantial infrastructure costs. If the number of houses built and sold or infrastructure costs depart materially from current assumptions, subsequent viability reassessment could place pressure upon affordable housing and other planning obligations.

Even a relatively small percentage reduction across 3,200 homes could result in the loss of a substantial number of affordable homes.

HDC should demonstrate that the delivery model is sufficiently resilient to maintain the promised affordable housing alongside the infrastructure required to create a

sustainable settlement. Any viability-review mechanism should also allow obligations reduced during adverse conditions to be recovered if viability subsequently improves.

4. The basis for selecting Adversane has not been adequately justified

Comparison with reasonable alternatives is fundamental to determining whether Adversane represents the appropriate strategy. Buck Barn is relevant for this purpose without CPRE Sussex needing to advocate its allocation.

HDC's Sustainability Appraisal does not establish Adversane as clearly superior overall to Buck Barn. Indeed, the SA expressly states that its appraisal 'does not aim to reach a conclusion on which scenario performs best overall' and identifies both the Adversane and Buck Barn scenarios as potentially performing well overall (HDCJB13, Non-Technical Summary, p. ii; paras 2.3.3-2.3.4). It concludes that Buck Barn is marginally preferable in transport terms (para 2.3.73) and also records a preference for Buck Barn over Adversane under economic growth (para 2.3.88). Other considerations favour Adversane, including its more compact form and secondary-school provision.

The reasonable-alternatives appraisal therefore does not itself reveal an overriding sustainability or deliverability advantage explaining the selection of Adversane. HDC nevertheless favours Adversane "on balance" (HDCJB13, Non-Technical Summary, p. ii and section 2.4). A particularly important factor in that choice is secondary-school provision.

The secondary-school justification

Secondary-school provision is a significant factor in HDC's preference for Adversane. The SA states that, whilst both Adversane and Buck Barn would deliver a secondary school, there is a "strong preference for Adversane" under the school-capacity objective because HDC considers there to be significant need for additional secondary capacity in this part of the District (HDCJB13, paras 2.3.14-2.3.20, particularly para 2.3.15).

However, WSCC's published school-place evidence does not demonstrate that a new secondary school at Adversane is required to meet an independently existing deficit. The Weald has already expanded from nine to ten forms of entry and WSCC states that another form of entry "may be required as more houses are built and occupied" (WSCC, Planning School Places 2025, Horsham District commentary - Billingshurst).

HDC has not clearly demonstrated:

- the additional secondary capacity required because of existing and already planned development, including East of Billingshurst;
- how much could be accommodated through expansion of The Weald or other measures;

- how much demand for the proposed new school would instead be generated by Adversane's own 3,200 homes; or
- when the Adversane secondary school would actually be required.

Without that analysis there is a risk of circular reasoning: **Adversane is preferred because it provides a secondary school, while much of the demand supporting that school may arise because Adversane itself is proposed.**

If school provision is the principal strategic advantage distinguishing Adversane from reasonable alternatives, that distinction must be demonstrated rather than assumed.

Delivery of the school is not assured

Allocation of land for a secondary school does not itself ensure that a school will be commissioned and delivered.

WSCC must be satisfied that forecast pupil demand justifies provision, while delivery may additionally require Department for Education involvement, an appropriate academy or other provider, capital funding, land transfer and coordination with development phasing.

Experience at North Horsham illustrates the complexity and lead time involved in delivering a new secondary school even after the educational requirement has been established. The more recent Bedelands Academy experience is particularly instructive: in August 2025 WSCC paused the proposed new secondary school notwithstanding safeguarded land and secured capital funding because forecast demand for places had not materialised (WSCC, "Plans for new Burgess Hill secondary school paused", 8 August 2025).

Equivalent evidence has not been identified establishing the commissioning, funding and delivery route for the proposed Adversane school or demonstrating when it would open.

It is therefore unsafe to attach decisive weight to the school as a benefit distinguishing Adversane from reasonable alternatives without demonstrating **both its need and its deliverability**.

5. Environmental constraints reinforce the need for robust strategic assessment

HDC's recent studies have addressed some of the environmental and infrastructure concerns raised during earlier consideration of Adversane. Nevertheless, the Council's own evidence continues to identify sensitivities relating to landscape and rural character, settlement pattern, the setting of the South Downs National Park, potential coalescence, heritage assets and the Adversane Conservation Area.

These matters are relevant cumulatively. Adversane is not an obviously unconstrained strategic location whose advantages clearly outweigh reasonable alternatives.

Two issues are addressed more fully in **separate CPRE Sussex representations**:

Water resources: CPRE Sussex's separate representation on MM142 addresses water neutrality and the adequacy of the Plan's water-resource evidence, including the implications of the substantially increased housing strategy and long-term water availability in Sussex North. Those arguments are not repeated here but are relevant to a major new settlement extending beyond the present plan period.

Barbastelle bats/Mens SAC: A separate CPRE Sussex representation addresses Barbastelle bats and functional connectivity associated with the Mens SAC. That detailed ecological case is not repeated here but remains relevant to the environmental assessment of Adversane and any future expansion.

6. Long term: the decision extends far beyond the Plan being examined

Only 1,425 of the proposed 3,200 homes are expected by 2040. **Most of the town would therefore be delivered under future plans rather than the Local Plan which establishes it.**

Once the initial settlement, roads, utilities, schools and other infrastructure are established, the strategic decision will in practical terms be irreversible and future expansion considerably easier.

Yet this examination cannot comprehensively determine the vision for what Adversane should ultimately become, how large it should grow, how it should relate to Billingshurst and surrounding settlements, or what strategic transport, education, water and other infrastructure might be required over subsequent decades.

These questions assume greater importance because the planning framework itself is changing. A new Horsham District 2045 Plan is commencing. Local government reorganisation will replace existing structures, while the emerging Sussex Strategic Authority and Spatial Development Strategy will provide mechanisms for considering housing, infrastructure and growth across a wider geography.

Those other processes are better suited to determining **whether Sussex needs a new settlement, where it should be located, what strategic purpose it should serve and how its infrastructure and long-term expansion should be planned.**

There is no demonstrated strategic advantage in making that effectively irreversible decision now through a late Main Modification to a plan ending in 2040.

Overall conclusion

The issue is not whether Adversane could eventually become a successful new settlement, but whether HDC has demonstrated that the decision to establish it **now** is justified and effective.

In the **short term**, Adversane contributes little when Horsham most urgently needs reliable housing delivery and five-year supply.

In the **medium term**, delivery depends upon interrelated assumptions concerning market absorption, infrastructure funding, utilities, schools, employment and sustainable transport, with potential consequences for affordable housing and other public benefits if those assumptions fail.

In the **long term**, most of the settlement would be built after the present Plan ends, while its future scale and strategic role would be determined within a substantially different planning framework.

HDC's reasonable-alternatives evidence does not establish Adversane as clearly superior to Buck Barn, while the principal apparent discriminator—secondary-school provision—has not been demonstrated either to require an Adversane new settlement or to have a sufficiently certain delivery route.

Taken together, the evidence does not justify committing the District now to its first new settlement in living memory.

CPRE Sussex asks

CPRE Sussex asks the Inspector to:

1. **Delete MM227 unless HDC can demonstrate that Adversane is justified and effective through evidence proportionate to a strategic decision of this scale and permanence.**
2. **Require HDC to demonstrate why Adversane represents the appropriate strategy when compared with reasonable alternatives**, including Buck Barn, rather than merely demonstrating that Adversane is capable of development.
3. **Require HDC and WSCC to substantiate the secondary-school justification**, distinguishing demand generated by existing and already planned development from that created by Adversane itself, assessing the potential expansion of The Weald, and demonstrating a credible commissioning, funding and delivery programme for the proposed new school.
4. **Require a robust delivery and infrastructure programme** demonstrating realistic first-completion and build-out rates and the timing, funding and dependencies of essential infrastructure, together with mechanisms protecting affordable housing and other public benefits if viability changes.

5. **Require Adversane to be assessed cumulatively with East of Billingshurst and other western-area development**, including market absorption, education, transport and infrastructure implications.
6. **Require HDC to demonstrate why approximately 65% of the Plan's numerical housing contingency should depend upon this single long-lead strategic site**, and whether earlier delivery from established allocations and a more diversified portfolio would provide greater resilience.
7. **If these matters cannot be satisfactorily resolved through the present examination, defer the decision on a new settlement to Horsham District 2045 and the emerging Sussex strategic planning framework**, where its location, strategic role, infrastructure requirements and potential long-term expansion can be assessed comprehensively.

SUSTAINABILITY APPRAISAL (SA)

CPRE Sussex considers that the Sustainability Appraisal does not adequately demonstrate that Adversane is the most appropriate strategic choice when considered against reasonable alternatives.

The SA itself does not determine that Adversane performs best overall. It states that the appraisal "does not aim to reach a conclusion on which scenario performs best overall" and identifies both Scenario 1 (Adversane) and Scenario 2 (Buck Barn) as potentially performing well overall (HDCJB13, Non-Technical Summary, p. ii). Buck Barn is marginally preferred in transport terms (para 2.3.73) and is also preferred over Adversane under economic growth (para 2.3.88), while other considerations favour Adversane and several objectives do not clearly differentiate between them.

The school-capacity assessment is particularly important because the SA identifies a "strong preference for Adversane" over Buck Barn on this objective (HDCJB13, para 2.3.15). However, the published school-place evidence does not demonstrate that a new school at Adversane is necessary to meet an independently existing deficit. Expansion of The Weald remains a possible response to housing-generated demand, while much of the demand supporting a new Adversane school would arise from Adversane itself. Nor has a sufficiently certain commissioning and delivery route for the new school been demonstrated.

This is particularly important because Adversane was introduced only at Main Modifications stage and the SA reasonable-alternatives work was undertaken alongside the late site-selection exercise. For an effectively irreversible decision to establish a new settlement of at least 3,200 homes, most of which would be delivered beyond

2040, CPRE Sussex considers that the SA does not provide sufficiently robust evidence that Adversane represents the appropriate long-term strategy.

HABITATS REGULATIONS ASSESSMENT (HRA)

CPRE Sussex has submitted a **separate representation addressing the Habitats Regulations Assessment and, in particular, Barbastelle bats and functional connectivity associated with the Mens SAC**. That detailed case should be read alongside our objection to MM227.

For the purposes of Adversane, the important point is that the relationship with the Mens SAC and the maintenance of functionally linked habitat and movement routes remain material considerations in determining the suitability, form and potential future expansion of a major new settlement.

Recent HDC evidence provides further assessment of these issues and identifies potential avoidance and mitigation measures. However, the effectiveness of avoidance and mitigation will depend upon the eventual masterplan, development form and long-term protection of the relevant ecological network.

Given that most of the proposed 3,200-home settlement would be delivered beyond the present plan period, and that its establishment may facilitate subsequent expansion, the HRA must provide a sufficiently robust basis not merely for the initial allocation but for the development strategy which MM227 establishes.

POLICIES MAP

If MM227 is deleted or deferred, the corresponding Adversane allocation should also be removed from the Policies Map.