



Examination of the  
Horsham District Local Plan 2023-2040

**MATTER 9, ISSUE 1: STRATEGIC SITES**  
**Strategic Policy HA4: Land East of Billingshurst**

**HEARING STATEMENT**

Prepared by Blue Fox Planning Ltd on behalf of:

**Richborough**

Representation Numbers: 1207902, 1211480 and  
1211486

November 2024

## Table of Contents

1. INTRODUCTION	3
2. MATTER 9 – SITES ALLOCATED FOR DEVELOPMENT IN THE PLAN.	5

APPENDIX 1: NETWORK RAIL RESPONSE TO REGULATION 19 CONSULTATION – 1<sup>ST</sup> MARCH  
2024

## 1. Introduction

1.1 This Hearing Statement has been prepared by Blue Fox Planning Ltd on behalf of Richborough. This Statement has been prepared specifically in response to question 11 of Matter 9 (Issue 1) relating to land East of Billingshurst.

1.2 Richborough control two sites within Horsham District, these being:

- Land at Glebe Farm Steyning; and
- Land off Coneyhurst Road, East of Billingshurst

1.3 With regards to **Land at Glebe Farm Steyning**, the Inspector will be aware that this site is included within the Submitted version of the Local Plan under Strategic Policy HA17: Steyning Housing Allocation. Specifically, that Policy states:

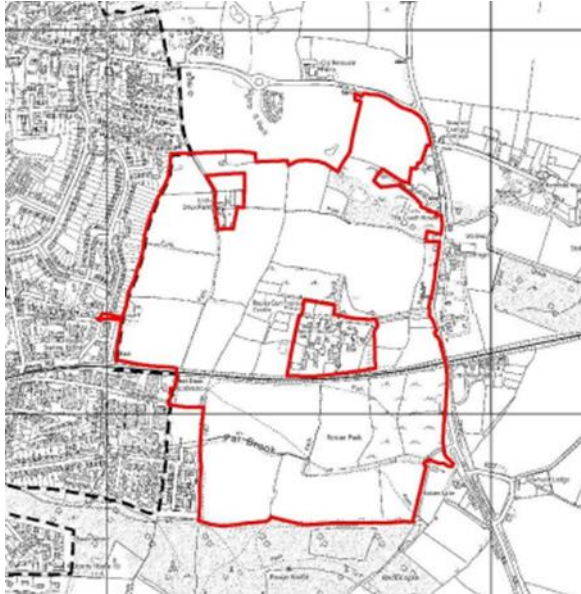
*"1. The following sites are allocated, as shown on the Policies Map, for the provision of at least 265 homes:*

*STE1: Land at Glebe Farm, 14 hectares (265 homes)...*

1.4 Other Hearing Statements produced on behalf of Richborough have explained the current status of the Glebe Farm site including that an outline application was submitted in September 2021 (LPA reference DC/21/2233) and that the Council's Planning Committee South resolved that permission should be granted on 26<sup>th</sup> September 2024.

1.5 Richborough's site at Coneyhurst Road, lies immediately to the south, albeit separated by the railway line, of the HA4 East of Billingshurst allocation. The Inspector's attention is respectfully drawn to the fact that, at Regulation 18 stage, the Local Plan allocated land both sides of the railway; that is to say the current HA4 allocation AND land that is now under Richborough's control. This is illustrated in **Figure 1**, below.

**Figure 1: Land East of Billingshurst (Little Daux) – Regulation 18 Horsham Local Plan, February 2020.**



- 1.6 Following the Regulation 18 stage, the land to the south of the railway was removed from the allocation. We understand that this was because it was not being actively promoted and therefore the Council considered that it may not be available for development. Richborough are now promoting the land and we can confirm that available for development.
- 1.7 We fully respect that, at this stage, the Examination is not considering omission sites. However, if as a result of the discussions on Matters 8 and 9, it is concluded that additional sites need to be identified, we can confirm that Richborough's site East of Billingshurst is available, achievable and deliverable for development.

## 2. Matter 9 – Sites Allocated for Development in the Plan.

**Matter 9, Issue 1 – Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?**

### **Q11. Is Strategic Policy HA4: Land East of Billingshurst sound?**

- 2.1 Our representations at Regulation 19 stage did not object to the proposed allocation of Land East of Billingshurst. Indeed, given our position on the overall housing requirement for the District, as set out in our Matter 8 Statement, we consider that there is a need to identify more sites for development than is currently proposed.
- 2.2 As such, we do not have concerns as to the soundness of this proposed allocation, however, we would respectfully ask the Inspector to consider whether a relatively minor amendment to Strategic Policy HA4 and its reasoned justification would make it more effective.
- 2.3 The Plan, both through Strategic Policy HA4 and its reasoned justification, is clear that development of this site must deliver the necessary infrastructure, facilities and services to meet the needs of the development and the existing community. The site's location close to the railway station also means that it has the potential to contribute significantly to active travel and other sustainable transport options.
- 2.4 Criterion 6 of Strategic Policy HA4 requires that development proposals must be accompanied by a “*comprehensive transport strategy*” to include a “*legible layout which facilitates and supports all modes of sustainable transport, and provides clear and safe linkages throughout the site and to adjacent neighbourhoods, local services, facilities, the railway station, and the countryside*”.
- 2.5 Part f of criterion 6 states that:

*“The development must provide appropriate safety improvements in respect of the railway line and the public right of way crossing in consultation with and agreement from Network Rail and West Sussex County Council. Prior to formal agreement, the layout shall safeguard land adjacent the railway around the existing footpath level crossing to provide the ability for the provision of a future footbridge or underpass to enable safe pedestrian, wheeling and cyclist crossing of the railway. Provision must be phased in accordance with railway safety requirements, and where not provided from the outset designed and land safeguarded to enable ramped wheelchair accessible provision in due course.”*

- 2.6 We fully support the requirement for the development to provide a new railway crossing, however, we are concerned that the policy and its justification are too vague as to when it is to be delivered to be effective.
- 2.7 For example, criterion 6f simply refers to the crossing being provided “*in due course*” whilst paragraph 10.114 is equally imprecise in stating that “*The footbridge should be phased with the development...*”. We believe, however, that the crossing is a critical element of infrastructure which should be provided at the outset of development.
- 2.8 At Regulation 19 stage, Network Rail commented specifically on this allocation and the crossing. A copy of the Network Rail comment can be found at **Appendix 1**. We note that Network Rail proposed additional wording be added at 6f which would amend the final sentence to read:

*“...Prior to formal agreement, the layout shall safeguard land adjacent to the railway around the existing footpath level crossing to provide the ability for the provision of a future footbridge or underpass to enable safe pedestrian, wheeling and cyclist crossing of the railway **and facilitate the closure of the level crossing...**”*

**Appendix 1: Network Rail Response to Regulation 19 Consultation – 1<sup>st</sup> March 2024**

- 2.9 This proposed wording has subsequently been accepted by the Council and included in proposed modification HM091. However, close reading of the Network Rail representation shows that it also stated:
- “... a condition limiting commencement of development is required until the crossing is closed and the alternative crossing is provided.”*
- 2.10 We support Network Rail’s request in this regard and believe that it should be firmly set out in policy HA4 and its reasoned justification.



## **APPENDIX 1**

### **Network Rail Response to Regulation 19 Consultation – 1<sup>st</sup> March 2024**



Network Rail  
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London  
EC4V 3DS

Via email: [localplan@horsham.gov.uk](mailto:localplan@horsham.gov.uk)

01 March 2024

Dear Sir/Madam

## **NETWORK RAIL RESPONSE TO HORSHAM DISTRICT COUNCIL REGULATION 19 CONSULTATION**

Thank you for providing Network Rail the opportunity to make comment on the pre-submission version (Regulation 19) of the Local Plan. It is important that the policies within the Local Plan reflect the aspirations of Network Rail and the wider rail industry as far as possible, and that the Plan provides suitable flexibility to support future growth of the railway for both passenger and freight services. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

In addition, Network Rail is a statutory undertaker responsible for maintaining, operating and developing the main railway network and its associated estate. Our aim is to protect and enhance the railway infrastructure, therefore any proposed development which is near the railway line or could potentially affect Network Rail's specific land interests will also need to be carefully considered.

Network Rail is a statutory consultee for any planning applications proposing development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. It is important that policies within the plan acknowledge the need for the impact of new development to be assessed and mitigated, both on an individual site by site basis, as well as the cumulative impact of multiple site allocations and/or windfall sites brought forward in the Plan period.



The following comments are designed to help strengthen the policies within the Draft Horsham Local Plan and their ability to deliver Network Rail's objectives.

### **Spatial Vision and Objectives**

Network Rail supports the vision of seeking a low carbon economy and the encouragement of non-car based transport. Network Rail also supports the aim of improving the active travel network and public transport and will continue to work with the Council in order to achieve this.

### **Strategic Policy 2: Development Hierarchy**

The settlement hierarchy identifies that Horsham is the main town in Horsham and notes the good rail and bus accessibility. Network Rail would agree with this assessment and there remain further opportunities to secure improvements to rail provision. Horsham station has step free access and is a category A station but does have scope for improvements to car parking and to allow for enhanced passenger flows.

Network Rail also note that Southwater, Billingshurst and Kilnwood Vale are identified as small towns and larger villages. There are significant developments proposed in these three settlements which will see them expand significantly and this assessment may need to be reviewed at future Local Plan reviews.

### **Strategic Policy 4: Horsham Town**

Network Rail supports the reference within the draft Policy to promote high quality transport infrastructure including rail. As noted above, there is scope for further improvements to Horsham station to accommodate existing and future growth. Network Rail would support reference to these improvements being included within the Policy so that financial contributions from development can help to fund these.

### **Strategic Policy 23: Infrastructure Provision**

Network Rail supports the reference in para 3 to the use of planning obligations and the Community Infrastructure Levy as well as planning conditions. The use of Grampian conditions to secure required infrastructure in advance of commencement of development or occupation of dwellings assists providers to ensure this is in place.

Network Rail would encourage reference to the Infrastructure Delivery Plan to be included within the Policy as the key indicator of infrastructure need and funding provision. This will ensure that as development come forward, it takes into account during the course of the determination of the planning application, any known infrastructure funding required. This will also provide the basis for developers to understand additional considerations for the site(s). It should also be mentioned that the IDP is an iterative document that should be kept up-to date regularly to understand delivery and that there is on-going collaboration with infrastructure providers such as Network Rail.

### **Strategic Policy 24: Sustainable Transport**

Network Rail supports the text within para E of the Policy which requires development to maximise rail access and, where necessary, the enhancement of rail station car parking.

### **Strategic Policy 27: Inclusive Communities, Health and Wellbeing**

Network Rail supports the inclusion within para 3 E of the Policy in encouraging the design and layout of development to support active travel and the linkages to public transport hubs.

### **Strategic Policy 37: Housing Delivery**

Network Rail note the dispersal of housing provision including additional housing within previously allocated sites. The additional 2,000 dwellings at land north of Horsham provide scope for securing improvements to Horsham rail station and continue to support modal shift. Additionally, Roffey Road level crossing is located in close proximity to the development area that forms land north of Horsham. This level crossing is identified as a high risk due to the quantum of development being brought forward and anticipated to occur. Network Rail would like to work with the Council and the developers of the site to ascertain a solution to the risk at the crossing in line with the level of development proposed.

### **Strategic Policy HA2: Land West of Ifield**

This site is relatively poorly served by public transport and this is acknowledged in the draft Policy. To enhance this, the Policy at para 8 A) sets out improved walking and cycling routes. This is supported however Network Rail request explicit reference to enhancing links with Ifield station and suggest the following additions (in bold):

*A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority over motorised traffic, and integrated with the existing and wider network (**including improved links to Ifield rail station**) will be delivered and maintained.*

### **Strategic Policy HA3: Land North West of Southwater**

Network Rail support the identification of several improvements to sustainable travel from the draft allocation site to Horsham and Christs Hospital. Network Rail supports the requirement within the Policy at para 7 B iii) for a new station car park and cycle storage at Christs Hospital rail station. Additionally, Network Rail have identified that Christs Hospital would be a priority station for the improvements in access to the station for all users. Inclusion within the Policy of the contribution towards improving access at the rail station would be necessary to accommodate users and ensure fair and equitable access to the rail network because of increasing development.

### **Strategic Policy HA4: Land East of Billingshurst**

Network Rail supports the requirement to provide a comprehensive masterplan for the site with details concerning phasing to be agreed. Network Rail wish to be part of this process given the proximity of the site to the railway and the need for mitigations regarding the level crossing and location in relation to the railway. Network Rail support part f of the Policy which promotes comprehensive sustainable travel improvements as part of the development.

In relation to para 6 of the policy, part a refers to a station car park in the south-west of the draft site allocation. The provision of this car park is not a requirement set by either Network Rail or the Train Operating Company as its location is some distance from Billingshurst station. It is unclear who would use the proposed station car park and how

this would be managed. Network Rail would prefer to see investment in the existing station facilities at Billingshurst, to secure benefits for the wider community.

Para 6 part F sets out the issues concerning the Daux level crossing that is located adjacent to the southern boundary of the site. Network Rail is supportive of the wording included within part F to mitigate the safety concerns of additional usage of the crossing, resulting from development of the draft allocation site. The provision of an alternative means of crossing the railway will allow the continued use of the existing Public Right of Way whilst closing the level crossing and allowing for the safety concerns to be significantly reduced. To reflect this, Network Rail would suggest additional wording as below in bold:

*Prior to formal agreement, the layout shall safeguard land adjacent **to** the railway around the existing footpath level crossing to provide the ability for the provision of a future footbridge or underpass to enable safe pedestrian, wheeling and cyclist crossing of the railway **and facilitate the closure of the level crossing.***

The closure of the crossing, and provision of an alternative means of crossing the railway i.e. a footbridge is necessary to remove the safety risk. During phasing of the development, a condition limiting commencement of development is required until the crossing is closed and the alternative crossing is provided.

Given the proximity of the draft allocation to the railway, the applicant will need to engage with Network Rail's Asset Protection Team (ASPRO) to ensure sufficient boundary fencing and treatments are in place to maintain the safety and security of the railway line.

#### **Strategic Policy HA7: Broadbridge Heath Housing Allocations**

Network Rail have identified improvements required at Horsham rail station and the proximity of BRH1 would justify requesting a financial contribution be secured to help to fund these improvements.

#### **Strategic Policy HA10: Horsham Housing Allocations**

Network Rail have identified improvements required at Horsham rail station and the proximity of HOR1 and HOR2 would justify requesting a financial contribution be secured to help to fund the improvements.

Network Rail supports the inclusion in HOR2 of provision of additional car parking spaces at Warnham rail station and allowing for safe crossing of the railway. Network Rail would like to highlight that where development interacts with the railway then consultation with Network Rail is essential to ensure safety around the railway is maintained.

#### **Strategic Policy HA13: Pulborough Housing Allocations**

There is an identified requirement for improvements to Pulborough station car park as a result on increased development within the immediate area. It would therefore be justified to request a financial contribution be secured towards these improvements as part of this draft allocation. Network Rail would like to highlight that where development interacts with the railway then consultation with Network Rail is essential to ensure safety around the railway is maintained.

## **Infrastructure Delivery Plan**

The IDP notes the eight mainline stations located within the District. The settlement hierarchy sets out the main town (Horsham) and larger villages and the rail provision within this.

For Bewbush level crossing, the current IDP states to works to change this to a footpath and bridleway crossing. Bewbush level crossing is very high risk and the current planning applications at Kilnwood Vale would allow for the crossing to be closed and the diversion of the footpath and bridleway over the new rail crossing. Network Rail suggest the addition of the closure of the crossing as facilitated by the new development. The closure of the crossing and diversion of the route would be essential as it forms a key part of the Kilnwood Vale development.

Christ's Hospital rail station is one of the priority locations for improving access for all within Horsham. Inclusion of this within the IDP will allow for future development to provide financial contributions to help fund these improvements.

Network Rail request that the IDP be updated to reflect the above to ensure the most up-to-date information is provided. The remaining information within the current IDP (dated 2023) is up-to-date and no further amendments, aside from those mentioned above, are required at this point. Network Rail will continue to work with the Council to provide updated information as and when this becomes available, or changes are required.

## **Conclusions**

Network Rail support the direction of the Local Plan and the supportive position of the Council for encouraging public transport and other active modes of travel as well as seeking to safeguard railway safety. Network Rail supports the wording in Policy HA4 which provides for an alternative means of crossing the railway to result in the closure of the level crossing and improvement in safety resulting from this.

Network Rail are keen to work with the Council to ensure that the Local Plan delivers on its aims whilst also ensuring that new development and other sources of funding provide for improved facilities and access for all users to the rail network.

I trust that the above is clear, should you require additional information please do not hesitate to contact me. Network Rail reserve the right to attend the Examination if considered necessary.

Kind regards,

**Craig Hatton MRTPI**  
**Senior Town Planner**