

PULBOROUGH PARISH COUNCIL

**Minutes of the Extraordinary Full Council Meeting held at the Parish Council Chambers,
Village Hall, Swan View, Lower Street, Pulborough, RH20 2BF, Monday,**

18th August at 6:00 pm.

Councillors present: Cllrs Sharon Curd (Chair) Jilly Marcuson, Jennie Esdaile, Ian Hare, Elizabeth Hunt, Andrew Perry, Frank Riddle.

Officers: Oliver Last (Clerk),

Also Present: David Hurst

Members of the Public: 2

The Chair welcomed everyone and gave a safety announcement.

FC039. Apologies for Absence

Apologies were received from Cllrs Lauren Bailey, Paul Clarke, Jonathan Campbell, Ruth Court, Andrada Labuschagne and Lissette Trembling.

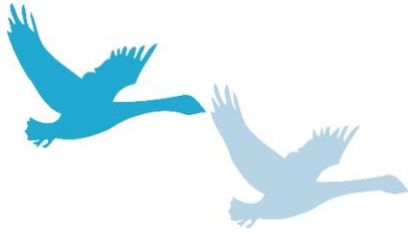
FC040. Declarations of interest

No declarations were received.

FC041. Public forum and questions

The Chair reminded the public that only questions and statements relating to items on this agenda will be allowed. Public participation shall not exceed 15 minutes, and a member of the public shall not speak for more than three minutes. During discussions of sensitive or confidential matters, the public will still be excluded.

A member of the public, who has been involved in objections to the Adversane proposals, addressed the Council and expressed serious concern about the impact on local infrastructure. They stated that the effect on Pulborough would be significant, particularly in relation to traffic, congestion and pollution. It was suggested that the A283 highway junction represents a major constraint, as there is insufficient space for it to be made to work effectively. Concern was also expressed that it is being assumed West Sussex County Council will resolve the traffic issues, despite the scale of the proposed development.



The member of the public also highlighted concerns regarding Pigeon Gate Bridge, particularly for pedestrians. It was noted that the proposed pedestrian bridge, including a “kink” in its alignment, may be poorly designed and could direct users the wrong way. The member of the public indicated that objections will be made in relation to both the highway junction and the pedestrian bridge.

FC042. Minutes of the Council meeting held on 13th July 2026

To approve the minutes of the Full Council meeting held on [13th July 2026](#) as a true and accurate record of the meeting.

FC043. Horsham District Local Plan Modifications

The Chair asked whether all councillors had read the papers supplied by the Clerk and provided a summary of the matter for consideration.

The Council considered the Horsham District Local Plan Main Modifications consultation, with particular reference to MM227, which proposes a new settlement for land at Adversane-Kingswood. Members noted that the consultation response is to be submitted via an online form and that this was the Parish Council’s opportunity to comment formally on the implications of the proposed development for Pulborough parish.

Members discussed the scale of development proposed, noting that the figures of 3,200 dwellings overall and 1,500 dwellings within the plan period represented a substantial level of growth. The Council considered whether the proposal was compatible with local priorities, including infrastructure, the environment, heritage, employment, transport and traffic, flood risk, and community facilities.

Particular concern was raised regarding deliverability. Members questioned whether sufficient evidence had been provided to demonstrate that the required infrastructure, including schools, utilities, transport improvements, open space, and community facilities, could be delivered in step with housing growth. It was felt that stronger wording should be sought to ensure that infrastructure is provided ahead of, or at least alongside, development, rather than after occupation has begun.

Transport impact was also discussed in detail. Members noted that the proposed development would be focused around the A29 and B2133 junction at Adversane and questioned whether this junction and the surrounding road network could safely accommodate the additional traffic generated by a settlement of this scale. Concern was expressed that the proposal would worsen existing congestion, safety, and connectivity issues, and that there was insufficient evidence to show that local roads and junctions could support the movement likely to arise.



Members also considered the principle of infrastructure first. It was felt that schools, shops, community facilities, sports provision, and open space should be delivered early in the development process, and that infrastructure delivery should be tied to clearly defined housing occupation thresholds.

Employment provision was another area of concern. Members noted that MM227 expects jobs to be delivered through an economic strategy, but questioned what this would mean in practical terms for Pulborough and surrounding communities. It was considered important that local employment opportunities be created in order to reduce unsustainable commuting patterns and limit additional pressure on the road network.

Landscape and rural character were also discussed. The proposal was described by Horsham as a completely new settlement and future small town, and members considered the impact this would have on the rural setting of Adversane and the wider countryside. The Council expressed concern about the loss of countryside, the weakening of wildlife corridors, and the risk of coalescence with surrounding settlements. Members also noted concerns about the potential effect on farmland, local character, and the wider landscape.

Additional concerns were raised in relation to drainage, water, and sewerage capacity. Members referred to existing sewer storm overflow issues and questioned whether water supply, sewage treatment, and surface water drainage arrangements were sufficient to support the proposed level of growth. The Council also noted concerns regarding surface water run-off and long-term maintenance arrangements.

Members further commented on the effect of the proposal on local services, including schools, healthcare capacity, and nearby transport infrastructure. Concerns were expressed about the wider implications for business rates, commuting patterns, electricity supply, and the ability of statutory services to absorb the additional demand created by a settlement of this scale.

The Clerk was instructed to draft a reply¹ to Horsham District Council setting out the reasons for the Council's objection and to circulate the draft to all councillors before submitting the final version to Horsham District Council.

It was **resolved** that the Council does not support the Horsham District Local Plan Main Modifications insofar as they affect Pulborough, with particular objection to MM227. The Council considers that the proposed new settlement at Adversane-Kingswood is not supported by sufficient evidence to demonstrate that the necessary transport and infrastructure capacity exists to support development of this scale. The Council further considers that the development would generate additional traffic which the local road

¹ The Council's response is appended at the end of these minutes



network is not capable of supporting, and that there is insufficient evidence to show that the surrounding roads, junctions and local transport infrastructure can safely accommodate the level of movement likely to be created. In addition, the Council notes a lack of evidence to demonstrate that water supply, sewerage capacity and surface water drainage, including surface water run-off arrangements, are adequate to support the proposed growth.

FC044. Stage 2 Consultation Community Governance Review

The Chair referred to the initial consultation undertaken earlier in the summer and explained that Horsham District Council had now developed draft recommendations, which included proposed changes to a number of parish boundaries and other arrangements across Horsham District.

Members were advised that the Council was being asked to confirm its position of “no change” and, if it wished, to comment on the Community Governance Review.

The Chair noted that a short response form had been attached to the agenda and invited members to indicate whether they had any comments to make.

It was **resolved** that Pulborough Parish Council confirms its position of “no change” in relation to the draft recommendations arising from the Community Governance Review and authorises the Chair, in consultation with the Clerk, to complete and submit the response form on behalf of the Council

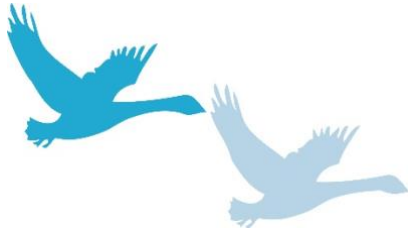
FC045. New Place Farm 106 Agreement

The Clerk reported that an email had been received formally making the offer, in accordance with Schedule 4, Paragraph 2.1 of the Section 106 Agreement relating to New Place Farm, Pulborough. The Council considered the proposal in detail and noted the assets offered for transfer, namely the Pump Track, Countryside Park, LEAP, and associated open spaces and infrastructure, together with the commuted sum for future maintenance.

The Clerk explained the importance of Members noting the liabilities associated with taking on these assets, including the ongoing responsibility for their future upkeep and maintenance. The Clerk also emphasised the importance of retaining the commuted sum offered for use over the coming years to meet maintenance costs, and that the funds should not be spent on unrelated purposes.

It was **resolved** that Pulborough Parish Council accept ownership of the assets offered under the Agreement. All were in favour.

6:59pm.



Appendix:

Pulborough Parish Council Response to Horsham District Local Plan Main Modifications Consultation – August 2026

To: Strategic Planning, Horsham District Council

This submission has been prepared following two separate meetings with the master planner, consideration of information supplied by Horsham District Council, feedback from local community groups, and an extraordinary full council meeting.

The document has been compiled with the assistance of AI to ensure clarity and completeness.

Pulborough Parish Council welcomes the opportunity to comment on the proposed Main Modifications to the Horsham District Local Plan 2023–2040.

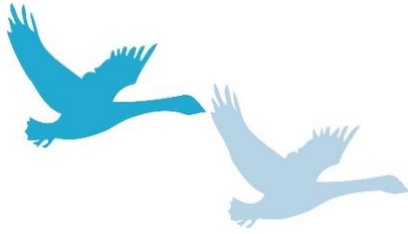
This representation is made with particular reference to Main Modification MM227 (the proposed new settlement at Adversane–Kingswood) and the implications for Pulborough parish.

The Council has considered the consultation documents, and at an extraordinary full council meeting, has resolved to **object** to the Horsham District Local Plan Main Modifications.

1. Summary and Principle of Objection

Pulborough Parish Council objects to the inclusion of MM227, which introduces a new strategic housing allocation at Adversane–Kingswood, at a late stage in the plan-making process. Our view is this has been done without the necessary evidence or certainty over infrastructure delivery and housing delivery assumptions required for a sound Local Plan. The Council is concerned that allocating the Adversane–Kingswood site is neither justified nor sustainable due to insufficient evidence that demonstrates it is the most appropriate option, taking into account reasonable alternatives and the requirements for infrastructure, environmental protection, and community needs.

The National Planning Policy Framework requires that Local Plans are “sound,” meaning they must be based on robust evidence, and be deliverable and consistent with national policy. By including a major new settlement without clear evidence that it can be delivered sustainably and with the necessary supporting infrastructure, the plan



risks failing these tests. If the plan is not justified or sustainable, the Planning Inspector may find it “unsound,” which means it cannot be adopted in its current form.

2. Lack of Evidence, Precedent, and Plan-Making Process

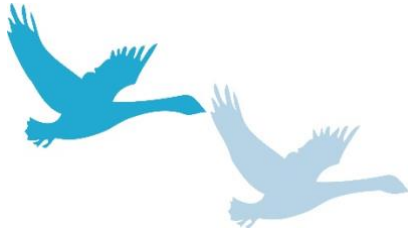
The Adversane-Kingswood site has not previously been included in the Local Plan due to longstanding concerns over deliverability, infrastructure, and market absorption. The sudden preference for Adversane-Kingswood is not supported by new evidence or a transparent comparative assessment. The National Planning Policy Framework (NPPF, para. 22) and Planning Practice Guidance require that new settlements be planned with a vision looking at least 30 years ahead, not retrofitted into a plan with a short time horizon and limited scrutiny of cumulative effects. The current approach risks undermining the integrity of the plan-making process and fails to provide the robust evidence base required for sound decision-making.

3. Traffic and Transport

Pulborough already experiences significant and well-documented transport challenges. The A29, which runs through the parish, is a critical north-south route for both local and regional traffic. At peak times, the A29 suffers severe congestion, particularly at the roundabouts of the Billingshurst bypass and further north towards Horsham. Within Pulborough itself, congestion is exacerbated by a series of pinch points: Pigeon Gate Bridge (which is under consideration for single-lane working), the traffic lights at Tesco, Church Hill, and the double roundabout at Swan Corner. These constraints already result in delays and safety concerns for residents and through traffic alike.

The B2133, while not passing through Pulborough parish, is a key feeder route connecting the A24 and carrying traffic towards Guildford. The current offset crossroads at Adversane will be further complicated by the intended bridge over the railway, which will need to be constructed before housing is built. This design will require westbound B2133 traffic to dogleg south, then west to cross the railway, and then join a new roundabout on the A29 before turning north to Billingshurst. This arrangement is likely to introduce further delays and complexity, rather than resolving existing issues.

No consideration for the inclusion of the traffic relating to the 160+ houses at New Place Farm in Pulborough has been given, which will result in yet more people using the A29 as a route north and south to employment centres. No allowance appears to have been made in the transport modelling for the extra vehicle movements generated by this new site. The Neighbourhood Plan survey, though now 12 years old, showed that 30% of employed people living in Pulborough commuted northwards to Horsham, Crawley, Gatwick, Guildford, or London. The failure to consider the combined effects of



both the Adversane–Kingswood proposal and ongoing developments within Pulborough undermines the credibility of the transport assessment and risks underestimating the true scale of traffic and infrastructure challenges facing the parish.

Public transport provision in Pulborough is already limited. Rail services, while valued, are operating at or near capacity during peak periods, and there is little evidence that additional capacity can be provided in the short to medium term. Bus services are infrequent and do not offer a realistic alternative for many journeys, particularly for those travelling to employment, education, or healthcare facilities outside the immediate area. Active travel options, such as walking and cycling, are constrained by the rural nature of the area, the lack of continuous safe routes, and the distances involved.

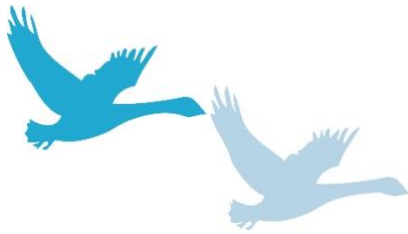
The proposed development at Adversane–Kingswood would generate a substantial increase in vehicle movements—estimated at 12,800 additional journeys per day (based on 3,200 homes, two cars per household, and two journeys per car per day, as referenced in the Bigstand response)—placing further pressure on an already overstretched network. Rather than addressing Pulborough’s existing transport issues, the proposed development would exacerbate them. Increased traffic would likely lead to longer journey times, greater congestion, and heightened road safety risks for all users, including pedestrians and cyclists. The additional demand on rail and bus services would further strain limited capacity, while the lack of realistic alternatives to car travel would entrench car dependency, contrary to the principles of sustainable development.

The Council is also concerned about the impact of additional retail provision at Adversane on existing businesses in Pulborough. It has been reported that a major supermarket has already expressed interest in locating at Adversane, which could have significant implications for the viability of current retail premises in the parish.

In summary, the proposed development fails to address the longstanding transport challenges faced by Pulborough and instead risks making them significantly worse. The Council urges the Inspector to consider the cumulative and site-specific impacts on the local transport network and to require robust, evidence-based solutions before any allocation is confirmed.

4. Infrastructure, Deliverability, and Phasing

The Council notes additional concerns, including the adequacy of NHS provision, the impact on local schools, electricity and water supplies, and the rationale for approving a project previously turned down.



There is a lack of clarity as to how the necessary health and education infrastructure will be funded and delivered in step with housing growth, and whether the local NHS Integrated Care Board is even committed to providing new primary healthcare facilities at Adversane-Kingswood, risking future reliance on already stretched services in Billingshurst and Pulborough.

The allocation is justified on the basis of providing a new secondary school, yet there is no guarantee of funding, timing, or delivery. The policy wording does not require the school to be delivered at a specific stage, risking housing delivery ahead of essential infrastructure.

There is insufficient capacity in the local electricity network, with upgrades likely to take years and no clear evidence of funding or deliverability.

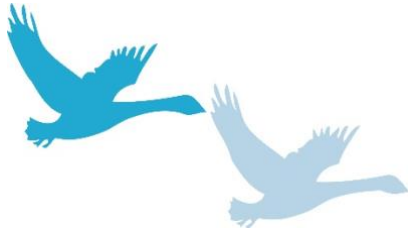
No details have been provided on required improvements to wastewater treatment or water supply, both of which are already under great pressure in the area. The Inspector should require clear evidence that these infrastructure elements can be delivered in step with development.

The Council also queries the position of West Sussex County Council on these matters, particularly in relation to school place planning, highways, and the delivery of essential utilities. These unresolved issues further undermine confidence in the deliverability and sustainability of the proposed allocation.

In addition, the deliverability of the new settlement is entirely dependent on the provision of a new railway bridge at Adversane Lane, a “hard constraint” recognised by all parties. There is no public evidence that this bridge is technically feasible, forward funded, or deliverable within the plan period. Without it, the allocation cannot be considered sound.

5. Environmental, Landscape, and Heritage Impacts

The Council is concerned about the impact of the proposed new settlement on the rural setting of Adversane and the wider countryside. The allocation would result in one of the largest losses of open countryside in the district, permanently altering the rural character and landscape of the A29 corridor. This brings with it significant risks to biodiversity, mature trees, ecological corridors, local wildlife, habitats, and countryside, and could irrevocably damage the setting of the South Downs National Park. Our understanding is that the damaging effect on the countryside is a principal concern associated with another potential development site, and we would argue that this same issue applies equally to the Adversane–Kingswood proposal. The



environmental harm posed by this allocation is substantial and should be given significant weight in the Inspector's consideration.

The Council is particularly concerned that the policy wording does not secure the necessary landscape buffers or protections for the rural setting, nor does it address the requirements of the made Neighbourhood Plans or the South Downs National Park.

It is also clear that the significant risks to the Adversane Conservation Area have not been adequately assessed, including taking into account the profound impacts on listed buildings and archaeology,

6. Landscape, Rural Character, and Settlement Coalescence (Strategic Policy 13, 14, 15, 17)

The loss of the strategic countryside gap between Billingshurst and Pulborough would undoubtedly lead to coalescence of settlements, creating a large and sprawling urban area.

The Council considers that it is vital that the policy wording should be strengthened to secure meaningful landscape and ecological mitigation, and to ensure that the distinct identities of local rural communities are preserved.

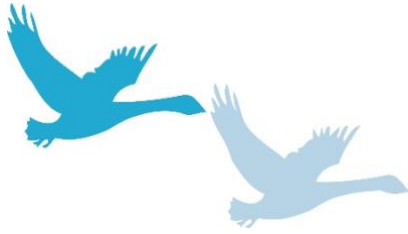
7. Employment and Community Sustainability

While MM227 refers to the provision of jobs through an economic strategy, the scale and timing of retail development is unclear, risking the development evolving into a self-contained and dormitory settlement.

Also, if there are insufficient local employment opportunities this will result in unsustainable commuting patterns, undermining community sustainability and increasing pressure on local transport infrastructure.

The Council seeks greater clarity and stronger policy commitments to ensure that employment provision is genuinely integrated with the phased housing delivery, and that a new development supports a balanced and sustainable local economy rather than functioning primarily as a dormitory settlement.

8. Policy References and Soundness



The Council's objections are grounded in the following policies and national guidance:

- NPPF para. 22: Requirement for long-term vision for new settlements.
- Strategic Policy 2: Development Hierarchy
- Strategic Policy 3: Settlement Expansion
- Strategic Policy 10: Flooding
- Strategic Policy 11: Environmental Protection
- Strategic Policy 13: The Natural Environment and Landscape Character
- Strategic Policy 14: Countryside Protection
- Strategic Policy 15: Settlement Coalescence
- Strategic Policy 17: Green Infrastructure and Biodiversity
- Strategic Policy 23: Infrastructure Provision
- Strategic Policy 24: Sustainable Transport

9. Conclusion and Formal Objection

For the reasons set out above, Pulborough Parish Council **objects** to the Horsham District Local Plan Main Modifications insofar as they affect Pulborough, with particular objection to MM227.

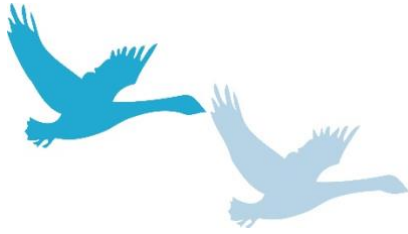
The Council considers that the proposed new settlement at Adversane–Kingswood is not supported by sufficient evidence to demonstrate that the necessary transport and infrastructure capacity exists to underpin the needs of a development at this scale.

The Council is concerned that the development would generate additional traffic which the local road network is not capable of supporting, and that there is insufficient evidence to show that the surrounding roads, junctions, and local transport infrastructure can safely accommodate the level of movement likely to be created.

Additionally, the Council notes a lack of evidence to demonstrate that water supply, sewerage capacity and surface water drainage, including surface water run-off arrangements, are adequate to support the proposed growth without detriment to Pulborough.

The Council requests that these concerns are fully considered by the Inspector and that further evidence is sought before any decision is made to proceed with the proposed Main Modifications.

The Council also requests that, should the Inspector proceed, the policy wording be amended to require infrastructure delivery (including the railway bridge and secondary school) ahead of or in step with housing development, and to ensure compliance with



**PULBOROUGH
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Working together for a better future

the made Neighbourhood Plans and the requirements of the South Downs National Park.

Yours sincerely,

Oliver Last
Clerk and Responsible Financial Officer to Pulborough Parish Council