

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?

Q5. Should Policies HA2-HA4 explicitly state whether or not a masterplan will be required as part of any planning application and whether such masterplans should include details of the phasing of development based on the development constraints and infrastructure provision?

- 9.1.1 Crawley Borough Council (CBC) believes that any strategic development adjacent to Crawley, including the proposed Strategic Site of West of Ifield, should be supported by comprehensive Masterplanning, undertaken based on existing character area assessment and infrastructure needs evidence. This should ensure that issues including flood risk, biodiversity net gain, carbon neutrality, air quality and noise impact and water neutrality are comprehensively addressed ahead of any development taking place. The Masterplan should be character-led to align with the National Planning Policy Framework (NPPF) and the 10 characteristics of the National Design Guide (NDG). This will identify townscape as well as landscape elements which form an area's character, including movement routes and nodes, boundaries, character areas, landmarks and topography. Some of these character components may not be nationally designated assets but are locally very important and valued.
- 9.1.2 The Crawley Borough Local Plan 2023 to 2040 (CBLP), October 2024: [Crawley Borough Local Plan 2023 to 2040.pdf](#), paragraph 12.19, highlights that developments adjacent to the borough should be laid out and designed to be reflective of their location as part of Crawley and should not result in harm to the setting of the master planned New Town nor result in urban sprawl nor unplanned merging of settlements. They should protect the setting of Crawley's existing neighbourhoods at the edge of the countryside. Paragraph 12.22 suggests that, where appropriate, Joint Area Action Plans would provide the most robust way to ensure Crawley's needs and concerns are fully addressed and proposals should be supported by a comprehensive Masterplan agreed by the relevant authorities.

Q7. Where do the neighbourhood centres sit in terms of the retail hierarchy set out in Strategic Policy 35 of the Plan? Will proposals for new neighbourhood centres need to be supported by retail impact assessment? If so, should this be specified in the relevant policies?

- 9.1.3 The CBLP, paragraph 12.23vi and vii, confirms that housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by CBC where it can be shown that... "vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents" and "vii. The development helps address unmet development needs arising from Crawley, including in relation to ... complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements".
- 9.1.4 However, as set out in CBC's response to Matter 7, Issue 2, Question 5c, the CBLP sets a local threshold for retail impact assessment of 500 metres square for impacts on Crawley Town Centre and expects any retail of this scale proposed at West of Ifield, should it be allocated, to undertake this testing.

- 9.1.5 In addition, due to its proximity adjacent to the existing neighbourhoods of Crawley, retail impact testing should also be assessed in terms of potential impacts on the existing Neighbourhood Centres of Ifield, Ifield West and Bewbush. This ensures CBLP Strategic Policy CL1: Neighbourhood Principle “*b. ensuring the neighbourhood centres remain the focal point for the local community, providing facilities that meet their day-to-day needs within walking distance*” is maintained by complementary and supportive provision in any new neighbourhood centre and is not undermined.

Q9. Is Strategic Policy HA2: Land West of Ifield sound?

- 9.1.6 CBLP paragraph 12.18 confirms that “*Well planned urban extensions which provide comprehensive, sustainable new neighbourhoods with local facilities and services, relate well to their rural landscape character and protect the setting of Crawley’s neighbourhoods could form an important way to meet Crawley’s housing needs. Therefore, the Local Plan acknowledges that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough*”. Joint working has been long established in recognition of this. Policy H1 commits CBC to continuing “*to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley*”.
- 9.1.7 Notwithstanding this, by Full Council decision, the position of CBC is to strongly oppose Homes England’s proposals on West of Ifield. This is reflected in the latest signed Statement of Common Ground (SoCG) between CBC and Horsham District Council (HDC), Document DC.04, paragraph 7.2, which states that “*The parties recognise that CBC submitted an in-principle objection to the WoC proposal as part of HDC’s Regulation 18 consultation and that CBC’s current formal position as reflected in their representation to the Regulation 19 HDLP is that it strongly opposes Homes England’s proposals, including their “West of Ifield” proposals*”.
- 9.1.8 CBC believes that this location is extremely sensitive in the setting of Crawley as a compact town in a countryside setting. It offers Crawley residents one of the best opportunities to access the wider West Sussex countryside. The north-eastern edge of the proposed site, long Ifield Brook within Crawley, is a Local Wildlife Site and a sensitive and highly valued Local Green Space site (see paragraphs 9.1.26-9.1.29 below). The Strategic Site is located adjacent to the Ifield Village Conservation Area and makes up the wider setting of the Grade I Listed Church, with views across the site. Furthermore, the site within and adjacent to the Ifield area is subject to flooding and, in its northern section, noise levels associated with Gatwick Airport. CBC believes these are critical issues which are contrary to the NPPF, in relation to heritage, landscape, amenity, noise, flooding, biodiversity. Therefore, the location is inappropriate, given the impact on residents in the western side of Crawley and on the important heritage and environmental assets in this area.
- 9.1.9 In addition, Crawley as a borough is already at, or over, capacity in terms of infrastructure services and facilities, including in relation to the local road network, education, health services, and sports facilities. CBC is not yet assured that sufficient mitigation of these impacts will be secured from the new development.
- 9.1.10 In considering the soundness of the CBLP, the Inspectors’ concluded in their Final Report, paragraphs 58 and 59, that they “*consider the Plan is justified in setting out the*

position of Crawley Borough Council, as a local planning authority, with regards to development 'At Crawley'... ..given any strategic growth on the edge of Crawley would give rise to impacts on Crawley it is justified that the submitted Plan sets out content on "Urban Extensions at Crawley" including Crawley-centric considerations" and "...the Plan articulates what would be required for Crawley to support adjacent growth proposals... ..they comprise reasonable expectations for sustainable development given the immediate impact of wider growth 'At Crawley', particularly on matters such as character and infrastructure, would be keenly experienced by communities in Crawley..."

9.1.11 Without prejudice to CBC's outstanding objection in principle to the proposed allocation of the Strategic Site to the west of Ifield, as set out in Document DC.04: CBC and HDC SoCG, July 2024, paragraph 7.3, the councils agree a number of matters to be pursued in discussions with the site promoter should Policy HA2 be adopted as part of the HDLP.

b) Does this allocation accord with the Plan's vision and objectives?

9.1.12 CBC is concerned that this allocation does not sufficiently address matters relating to the Climate emergency and Climate Change. It has not taken the opportunity to achieve moderate compact development, gentle average densities on the developable sites within the overall allocation area, subject to existing character assessment. For consistency with new development in the existing neighbourhoods of Crawley, new neighbourhood development should maximise the most efficient use of land and design this in from the start. This would also support viable sustainable public transport infrastructure that can realistically achieve a sustainable mode share of at least 40% of all journeys.

9.1.13 CBC believes that, should this allocation be maintained in the HDLP, the policy should require character assessments to establish a comprehensive evidence base to protect and improve what is valued. CBC believes that the NPPF is clear that this should be based on effective community engagement and proposals should reflect local aspirations for the development of their area.

9.1.14 As proposed, the policy supporting the allocation is unsound as it does not itself set out a clear design vision and expectations. It hasn't ensured that plans have been developed with local communities and are grounded in an understanding and evaluation of each area's defining characteristics. On this basis, it hasn't met the NPPF requirement to prepare design guides or codes consistent with the principles set out in the NDG and National Model Design Code (NMDC), and which reflect local character and design preferences.

d) Is the allocation consistent with paragraph 99 of the NPPF, particularly with regard to the loss of Ifield Golf Course?

9.1.15 CBC supports the requirement to ensure appropriate mitigation for the loss of Ifield Golf Course (IGC). This course was included in the golf assessment for Crawley set out the Crawley Playing Pitch Strategy Stage C, 2021 ([PPS Stage C needs assessment March 2021.pdf \(crawley.gov.uk\)](#)) and the Crawley Playing Pitch Strategy Stage D, 2021 ([PPS Stage D strategy action plan March 2021.pdf \(crawley.gov.uk\)](#)).

9.1.16 CBC considers that any assessment in relation to IGC should take into account Crawley, due to it being the closest town to the facility. HDC Document IO3 acknowledges this in paragraph 2.48, reporting that Ifield Golf & Country Club

accommodates considerable demand from Crawley due its location. Critically, paragraph 2.48 recognises that Crawley has one of the lowest rates of provision in the South East region. Therefore, the loss of the IGC will have an impact on golf provision serving Crawley.

- 9.1.17 CBC maintains that it is not possible to conclude that the golf course is surplus to golf requirements. It is necessary to understand what of form replacement is being provided to mitigate the loss of IGC, to ensure this it is possible to mitigate its loss appropriately and sufficiently within a reasonable catchment. Both councils need to be satisfied that the loss is able to be mitigated appropriately.

e) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?

Sustainable Transport

- 9.1.18 CBC is concerned that any strategic development proposed and delivered immediately adjacent to Crawley should not have any impacts on the already congested local road network in the borough. CBC strongly supports the requirements for a comprehensive transport strategy should West of Ifield continue to be allocated in the HDLP.
- 9.1.19 The CBLP, paragraph 12.23iii and 12.23x, confirms that housing development through urban extensions on or close to Crawley’s administrative borough boundaries will be supported by CBC where it can be shown that... *“i. Cumulative infrastructure needs are clearly identified and programmed for delivery in coordination with new development, and the proposal would not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of traffic and transport...”* and *“viii. Linkages are maintained from Crawley’s neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links (public transport, cycling and walking routes) into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option...”*.
- 9.1.20 The CBLP does not allocate any strategic-scale residential development; assumptions about modal shift built into the CBC transport modelling are based on the expectation of Travel Plan measures and an overall programme of improvements to sustainable/public transport, rather than bespoke development-specific mitigations which are identified at this stage. The [Crawley Transport Study \(June 2022\)](#) assumes an average reduction of 9% in car trips from new sites, together with a 5% reduction in all car trips within the borough (paragraphs 6.6.1 to 6.7.3). CBC considers that West of Ifield, as a new strategic development, provides an opportunity to deliver a bespoke package of wider transport mitigations and on-site facilities that would go significantly beyond these targets. On this basis (envisaging measures including a ‘high quality bus corridor’) Scenario 3 of the CBC Study models West of Ifield on the basis of a 12% reduction in trips between the development and key zones within Crawley (paragraphs 6.8.1 to 6.8.3).
- 9.1.21 CBC supports the prioritisation of walking and cycling routes within the allocation policy. However, it is also important for these to be usable and useful routes when connecting into and through Crawley towards key destination points.
- 9.1.22 CBC’s detailed response in relating to transport and the Crawley Western Multi-Modal Transport Link is set out in its Written Statement to Matter 6.

h) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?

9.1.23 The CBLP, paragraph 12.23iii and 12.23x, confirms that housing development through urban extensions on or close to Crawley’s administrative borough boundaries will be supported by CBC where it can be shown that... *“iii. Crawley’s character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport is maintained...”* and *“x. Development has been designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate...”*.

9.1.24 As set out in paragraph 9.1.1, the need for a comprehensive character-led masterplan is critical to ensure heritage, biodiversity and landscape are fully addressed, alongside other key issues such as movement routes. These character assets may not all be nationally designated but are valued by local residents.

9.1.25 CBC supports:

- the assessment of the rural site character and key features within the area, including the ancient woodland, Local Green Space, Ifield Village Conservation Area and Grade I Listed St. Margaret’s Church;
- the principles that any development in this location must respect the rural and natural environment and local heritage and be brought forward in a sensitive way which generates net biodiversity gain, effectively mitigates any adverse impacts on protected species and delivers green infrastructure that is functionally linked to the surrounding environment;
- the principle that development would also need to ensure that access to the wider countryside for existing residents of Crawley is retained.

Ifield Brook Wood and Meadows Local Wildlife Site and Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space

9.1.26 CBC strongly supports the requirement to conserve and enhance Ifield Brook Wood and Meadows Local Wildlife Site and Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space (the LGS) and for ensuring an appropriate buffer, should West of Ifield continue to be allocated in the HDLP. However, CBC is concerned that without clearer understanding of the context and the purposes of the two Ifield Brook Meadows designations, this requirement may be ineffective. CBC suggests that Ifield Brook Meadows and Rusper Road Local Green Space, and the importance of the area to the setting of Crawley, and as open countryside for residents on west side of Crawley is clarified. Also, the correct names for the two designations should be included in Policy HA2.

9.1.27 CBC objects to development of the fields to the western side of the borough along Ifield Brook. The LGS is a designated Local Green Space site, rather than a Local Greenspace. CBLP Policy GI4: Ifield Brook Meadows and Rusper Road Playing Fields confirms that: *“This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, visual amenity, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area”*... and that it *“...will be safeguarded from development other than in very special circumstances or where the development is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife”*.

- 9.1.28 Part of the value of this LGS is the tranquillity and access to the Sussex countryside beyond that the wider setting offers – including the historic rural setting of the Ifield Village Conservation Area and the Sussex countryside beyond Ifield Brook. Strategic development would significantly and negatively impact on this setting and the experience of the Local Green Space.
- 9.1.29 Should development be considered in this location, regard must be had to the impacts on the important values of the area. Design; building layouts and heights; landscaping; maintaining adequate, meaningful and effective buffer zones; and retaining linkages from Crawley’s administrative boundary going into the countryside on the Horsham district side, will be essential. Development must not rely on urbanised access through the Local Green Space, harming the natural character of the area.

j) Have the impacts on Crawley been adequately assessed and mitigated?

Comprehensive Urban Extensions and future potential growth to the West of Crawley

- 9.1.30 CBC believes the only way to fully assess and mitigate the impacts on Crawley is to establish a 30-year vision, clearly defining the land between Crawley and the settlements in Horsham, including Horsham town, in order to understand the long-term intentions, beyond the Plan period, for locations “at Crawley”. CBC’s response to this is set out in more detail in CBC’s Written Statement for Matter 2, Issue 1, Question 2.

Housing Mix and Affordable Housing

- 9.1.31 CBC sets out its position in relation to housing mix and affordable housing for any proposals for strategic development on Crawley’s administrative boundaries in its Written Statement to Matter 8.

k) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?

- 9.1.32 See CBC’s responses to Matter 6, Infrastructure and Transport.