

Matter 2 – Plan Period, Vision, Objectives and the Spatial Strategy

Matter 2, Issue 1 – Is the context and Plan period clear and would the strategic policies of the Plan look ahead over a minimum of 15 years from adoption?

Q2. Paragraph 1.2 of the Plan says the Plan considers a longer term context up to 30 years for strategic scale development. Which specific parts or policies of the Plan specifically considers this longer term context e.g. the “Strategic Site Allocations” and is the Plan effective in this regard?

- 2.1.1 Paragraph 4.3 of the Horsham District Local Plan (HDLP) recognises that “*some strategic allocations in this plan will build out beyond the plan period*” and states that “*the context of these sites within a 30 year vision has been considered as part of the preparation of this plan.*” However, for the Strategic Site allocation to the west of Ifield, paragraph 10.84 of the HDLP argues that the uncertainties regarding water neutrality and the outcome of the Development Consent Order proposals to expand Gatwick mean that a longer term vision for this area cannot be considered until a subsequent Local Plan review.
- 2.1.2 Crawley Borough Council (CBC) has raised concern that this continues to leave ambiguity as to whether or not a larger scheme would come forward in subsequent plans. CBC believes that the potential scale of growth in this area, with 10,000 homes being promoted, means it is critical to understand the long-term intentions for this wider area, beyond the Plan period. Further development in any part of Horsham district will be affected by water neutrality, not just that located close to Crawley’s boundary, and the additional land promoted for the remainder of the 10,000 dwellings would be further south of the proposed West of Ifield site and, therefore, less impacted by any future plans at Gatwick Airport. Therefore, additional development in Horsham district in the future, beyond the current proposed plan period, cannot be realistically ruled out completely, and so it is difficult to understand why a longer term (30-year+) vision for this area should not be established through this current Plan.
- 2.1.3 If there is still the possibility that further large scale development could come forward in this area, then any development proposed now through the HDLP 2023 – 2040 should take into account the associated full potential infrastructure needs and ensure it is designed in such a way as to not prevent strategic infrastructure needs being provided in a holistic and appropriate manner and enable infrastructure needs to be considered on a comprehensive basis.
- 2.1.4 Some critical infrastructure would only be viable on a significant scale (of 10,000 dwellings), but incremental development will not deliver these. This includes the Kilnwood Vale rail station, adequate health provision including a health centre, and the full Crawley Western Multi-Modal Link Corridor (see CBC’s Written Statement on Matter 6, Issue 1, Question 2). Previous experience for all of these in relation to the requirements of Kilnwood Vale neighbourhood has shown that once the neighbourhood is allowed and built as a standalone scheme it is no longer possible to secure them. Should this HDLP be adopted solely considering the implications of 3,000 dwellings at West of Ifield, these may not alone trigger the provision of such significant infrastructure and the opportunity for them to be properly planned in at the start will be lost.
- 2.1.5 It is also necessary to ensure the purpose of land between the towns can be clearly defined for the longer term, through a 30-year vision, to ensure there are defensible,

logical and character-led boundaries. CBC's concerns regarding the need for existing character assessment is set out in its Written Statement to Matter 9.

- 2.1.6 As part of CBC's response to the HDLP Regulation 18 consultation, CBC confirmed that, should the site be allocated, CBC considers it critical that the allocation and the map should refer to the whole of the wider site, not just West of Ifield. This maintained that: *"this is the case even if only the first phase "West of Ifield" is to be brought forward within this Plan period. It is essential that any development in this location is considered in its entirety as it significantly impacts on how the long term planning for infrastructure is considered. This Plan can state clearly how much of the overall 10,000 (and phase one: 3,000) dwellings would be brought forward within this Plan period without ignoring the wider strategic scheme. It would then be possible to put into place the opportunity for proper long-term strategic planning, potentially through joint plans, for the remainder of the site, outside the first phase allocation. Any smaller development, part-neighbourhood or smaller incremental development or isolated scheme, should not be allocated or supported until a full masterplan has been prepared. This is to ensure the proposals come forward comprehensively and can be supported by sufficient infrastructure delivered up front and in advance, which recognises the larger scheme rather than otherwise only seeking to mitigate each phase, and resulting in an unsustainable, less satisfactory outcome"*.
- 2.1.7 On this basis, clarity regarding the relationship of the allocation to the wider 10,000 dwellings series of urban extensions to the west of Crawley (of which the 3,000 dwellings proposed at the West of Ifield forms the first phase, i.e. not including Kilnwood Vale neighbourhood) is strongly requested at this stage, particularly in light of the new national government's clear steer on New Towns and large urban extensions and clarification on whether the 10,000 is being promoted to the New Towns Taskforce is sought.
- 2.1.8 CBC maintains that paragraph 10.84 should also acknowledge impacts on Crawley of any further expansion to the west of the borough, or otherwise, and need for collaboration with CBC. This should not just be a HDC decision.
- 2.1.9 Alternatively, this HDLP should confirm that development beyond Kilnwood Vale and the current proposal of West of Ifield is not acceptable, not part of the longer-term Vision, and development should be designed to ensure the development edge boundaries are clear and not breached by incremental or further strategic development.

Matter 2, Issue 3 – Whether the Spatial Strategy and overarching policies for growth and change are justified, effective, consistent with national policy and positively prepared?

Q3. Is Strategic Policy 2: Development Hierarchy sound?

e) What is the relationship between settlement types, settlement boundaries and the sites allocated in the Plan? Has land West of Ifield allocated in the Plan adjoining Crawley been dealt with effectively in the settlement hierarchy?

- 2.3.1 Notwithstanding CBC's outstanding objection in principle to the proposed allocation of the Strategic Site to the west of Ifield, it acknowledges that delivery of homes in new neighbourhoods in close proximity to Crawley is an appropriate way to meet the needs of the emerging households from within Crawley's existing population, and joint working has been long established in recognition of this. This is confirmed in the recently adopted Crawley Borough Local Plan 2023 to 2040 (CBLP), October 2024, paragraph 230: [Crawley Borough Local Plan 2023 to 2040.pdf](#). 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”.

- 2.3.2 Specifically, CBLP paragraphs 12.17-12.23, sets out CBC’s position in relation to such new proposals. 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”.
- 2.3.3 Critically, Crawley was established as a New Town in 1947, masterplanned on a neighbourhood-by-neighbourhood basis. The neighbourhoods are a key feature of Crawley’s character; with each of the town’s 13 neighbourhoods having been designed to ensure sufficient facilities and services are in place to support the day-to-day needs of residents. The neighbourhood principle is still relevant today, with the two new neighbourhoods being built at Forge Wood, north east of Pound Hill, and Kilnwood Vale, to the west of Crawley. Crawley’s character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport should be maintained through any proposed new urban extensions on its boundary.

Q4. Is Strategic Policy 3: Settlement Expansion sound?

d) Is it clear how a decision maker should react to the term “defensible boundary”?

- 2.3.4 Please see response to Matter 4, Issue 2, Question 3 regarding the importance of ensuring a clearly defined urban edge for any strategic development west of Crawley.

Matter 2, Issue 4 – Whether the strategy and overarching policies for growth and change in Horsham Town and Broadbridge Heath are justified, effective, consistent with national policy and positively prepared?

Q2. Is Strategic Policy 5: Broadbridge Heath Quadrant sound?

a) Is the relationship with the economic development policies clear? Is the threshold for retail impact assessment justified and is the policy robust with regard to its approach to impact on Crawley Town Centre?

- 2.4.1 In its formal representation to the Horsham District Plan Regulation 19 consultation, CBC suggested that Strategic Policy 5 should give consideration to impacts on Crawley Town Centre. This recommendation has not been included in the schedule of Suggested Modifications (November 2024), Document SD14, and the policy continues to only refer to impacts on the vitality and viability of Horsham Town Centre.
- 2.4.2 Broadbridge Heath falls within the catchment area for Crawley Town Centre. This has been established in the evidence which supported the CBLP 2023 to 2040: the Crawley Town Centre Retail, Commercial Leisure & Town Centre Neighbourhood Needs Assessment, 2020: <https://crawley.gov.uk/sites/default/files/documents/PUB354608.pdf> paragraphs 2.1 to 2.8, pages 7 to 9, refers). The CBLP refers, in paragraph 11.42, to matters of impact

on the Town Centre, Neighbourhood Parades and other centres within the retail catchment.

- 2.4.3 Given the retail/leisure focus at Broadbridge Heath, and for consistency with the CBLP, CBC believes that Strategic Policy 5, Part 6 should be amended to also refer to impact on: other centres within the catchment area.
- 2.4.4 This is considered necessary for soundness, in order to comply with the National Planning Policy Framework (NPPF), paragraph 90, which sets out that impact assessments should include assessment of impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.
- 2.4.5 Impacts on Crawley Town Centre and Neighbourhood Centres is further picked up in CBC's Written Statements to Matter 7 and Matter 9.