



Examination of the Horsham District Local Plan 2023-2040

Matter 5 (5a): The Spatial Strategy and site selection

- i. **Spatial distribution: whether the plan's proposed distribution of development is an appropriate spatial response to:**
- **housing need in the District and in adjacent districts**
 - **the settlement hierarchy and settlement character**
 - **access to employment, social and community facilities and the objective of reducing the need to travel**
 - **the highway network**
 - **the rail network**
 - **public transport and active travel**
- 1.1 The Local Plan evidence identifies a substantial housing requirement within Horsham District, including the need to accommodate significant unmet needs from neighbouring authorities. The Horsham District Local Plan Sustainability Appraisal Update (SA Update) (December 2023) assessed alternative growth scenarios, spatial strategies and strategic site options and concluded that concentrating a proportion of growth in sustainable urban extensions adjoining larger settlements, including Crawley, performs far more favourably than dispersing equivalent development across smaller settlements.
- 1.2 The Council's assessment of reasonable alternatives demonstrates that strategic allocations adjoining existing urban areas are better able to deliver housing, infrastructure and sustainable transport improvements in a coordinated and comprehensive manner, thereby promoting sustainable development. In that context, Land West of Ifield performs particularly strongly due to its relationship with the large settlement of Crawley, accessibility to employment opportunities and capacity to support strategic infrastructure alongside housing delivery. The allocation therefore represents an appropriate and justified component of the Plan's spatial distribution strategy.
- 1.3 In relation to the settlement hierarchy, West of Ifield adjoins Crawley, the principal employment centre within the Northern West Sussex Housing Market Area and the Gatwick Diamond and is consistent with Strategic Policy 2 and the Plan's objective of directing growth to sustainable locations. Given Crawley's significant economic role within the North West Sussex Housing Market Area, and limited capacity for growth within its own tightly constrained administrative boundary, it is sensible and appropriate for





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the Plan to direct a proportion of development to sustainable locations adjoining the urban area. This approach aligns closely with paragraph 2.32 of the *Crawley Borough Local Plan 2023-2040*¹.

- 1.4 The Council's assessment of reasonable alternatives demonstrates that the site's proximity to Crawley town centre, Manor Royal and Gatwick Airport provides a significant advantage over alternative strategic locations in the district. The relationship between HA2 and Gatwick Airport is also recognised in the *Environmental Statement Appendix 17.9.3: Assessment of Population and Housing Effects*², which identifies that future employment growth associated with the airport will be met through planned housing provision in surrounding Local Plans. When considering wider sustainable travel objectives, there is further strong justification for locating large scale, strategic allocations in areas that are well connected to major employment areas. The allocation therefore plainly assists in aligning housing growth with one of the South East's most significant employment centres and represents a clear advantage when compared with most other locations further removed from the principal economic drivers within the northern part of the District.
- 1.5 The allocation is also capable of delivering employment floorspace, schools, healthcare provision, a local centre, recreation facilities and strategic green infrastructure, creating a sustainable mixed-use community. In transport terms, the evidence demonstrates that impacts can be appropriately mitigated through improvements secured by the allocation, including delivery of the middle phase of the Crawley Western Link Road. This infrastructure is identified as "critical" within the Horsham Infrastructure Delivery Plan³. The West Sussex Transport Plan 2022-2036⁴ identifies it a medium term (2027-32) active travel priority. It is also identified as a strategic intervention as part of the TfSE Strategic Investment Plan (N10)⁵; Mitigation also includes enhanced bus services, improvements to Ifield railway station and comprehensive walking and cycling connections identified through the Local Cycling and Walking Infrastructure Plan (LCWIP). The NPPF requires development not to be prevented on transport grounds, unless impacts would be 'severe'. The evidence clearly indicates that this threshold would not be exceeded following appropriate mitigation. The allocation's ability to support strategic infrastructure investment is a key advantage of development at this scale.
- 1.6 West of Ifield benefits from a level of accessibility not available at most alternative strategic locations. The site is located close to and will support upgrades to Ifield railway station and the Crawley Fastway bus network, identified within the South East Transport Strategy 2025⁶ as key priorities, providing direct connections to Crawley, Gatwick Airport, London and the wider South East. The SA Update recognised the benefits of concentrating development in locations where sustainable transport modes can realistically compete with private car use, supporting wider objectives relating to modal shift, carbon reduction and healthier travel choices. By integrating new active travel infrastructure with existing urban networks, the allocation supports national and local objectives to reduce carbon

¹ [Crawley borough Local Plan 2023 to 2040.pdf](#) paragraph 2.32

² [Environmental Statement Appendix 17.9.3: Assessment of Population and Housing Effects](#)

³ [Horsham District Council Infrastructure Delivery Plan 2026](#) Page 101

⁴ [West Sussex Transport Plan 2022-2036](#) Page 43

⁵ [Strategic Investment Plan - evidence base - Transport for the South East](#)

⁶ [TfSE Framework Template](#) Page 75





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emissions, improve health outcomes and encourage modal shift, as well as bringing wider benefits to the existing population.

1.7 Whilst environmental and landscape considerations have been identified through the SA Update and the Site Assessment Report Update (June 2026), the evidence base concludes that they can be readily addressed through masterplanning, green infrastructure, biodiversity enhancement and other mitigation measures. The Council has therefore rightly concluded that the sustainability, housing delivery and infrastructure benefits of the allocation justify its inclusion within the preferred spatial strategy.

1.8 Accordingly, having regard to the Local Plan evidence base, SA Update and site selection process, Homes England supports the proposed spatial strategy. Land West of Ifield represents a sustainable and deliverable opportunity for strategic growth, near Crawley's unmet need, major employment centres, public transport and services. Its ability to deliver significant housing and supporting infrastructure in a comprehensive manner demonstrates that its inclusion within the Plan's spatial distribution strategy is justified, effective and consistent with national policy.

ii. **Constraints: whether the distribution of development is sound having regard to**

- **landscape and countryside**
- **heritage assets and their settings**
- **habitats and biodiversity**
- **flood risk and climate change mitigation**
- **services including water and sewerage**

2.1 Homes England considers that the proposed distribution of development, including the allocation of Land West of Ifield (Policy HA2), is justified, effective and consistent with national policy when assessed against the environmental and infrastructure constraints identified through the Local Plan evidence base.

2.2 The allocation has been subject to extensive assessment through the Council's site selection process and supporting evidence, including the SA Update, Horsham District Local Plan Sustainability Appraisal Addendum (July 2026), Strategic Housing and Economic Land Availability Assessment (SHELAA), Strategic Flood Risk Assessment (SFRA), Habitats Regulations Assessment (HRA) and other technical studies. Collectively, this evidence has demonstrated that whilst the West of Ifield site, is subject to some environmental and infrastructure constraints, these do not preclude development and can be appropriately managed through policy requirements, masterplanning and mitigation measures.

2.3 Furthermore, extensive engagement has taken place with Natural England, Historic England, Environment Agency, the Local Lead Flood Authority, Thames Water and Southern Water regarding masterplanning of the site. Whilst statutory consultees have identified matters requiring mitigation and further consideration through the masterplanning and planning application process, the evidence before the examination does not identify any constraint that would prevent delivery of the allocation.





▪ Landscape and Countryside

2.4 The Site Assessment Report Update (June 2026) and the SA Update considered landscape sensitivity and countryside impacts as part of the evaluation of strategic growth options. The SA Update assessed alternative spatial strategies and concluded that directing growth towards strategic urban extensions adjoining existing settlements can perform favourably in sustainability terms through their ability to deliver housing, infrastructure and sustainable transport opportunities in integrated locations.

2.5 The allocation's location adjacent to Crawley enables development to be comprehensively planned with significant green infrastructure, landscape buffers and retention of important landscape features. These requirements are incorporated within Policy HA2 and are capable of mitigating landscape effects whilst maintaining the distinct identity of nearby settlements.

Whilst landscape effects have been identified through the assessment process, the evidence base does not conclude that these impacts are such that allocation should be ruled out.

▪ Heritage Assets and their Settings

2.6 Potential effects on heritage assets and their settings have been assessed through the SA Update and the Site Assessment Report Update (June 2026) and supporting heritage evidence.

2.7 The Site Assessment Report Update (June 2026) identifies heritage as an important consideration in the assessment of strategic site allocations but does not conclude that heritage constraints prevent development of the site. Instead, any effects will be addressed through careful masterplanning, layout, design and the incorporation of appropriate mitigation measures secured through future planning applications. The evidence therefore demonstrates that heritage considerations have been appropriately considered and do not undermine the suitability of the allocation. The evidence demonstrates that heritage considerations have informed the site's assessment and allocation. Whilst impacts on heritage assets and their settings require careful consideration; the evidence does not conclude that they are such that allocation should be ruled out. Rather, these matters will be addressed through the design process, including the disposition of development parcels, landscaping, buffers and the treatment of key views.

▪ Habitats and Biodiversity

2.8 The Habitats Regulations Assessment (HRA) (updated June 2026) and the SA Update considered the ecological implications of growth options across the District. The evidence demonstrates that impacts on habitats and biodiversity will be addressed through strategic green infrastructure, habitat creation, ecological mitigation and biodiversity enhancement measures. The Local Nature Recovery Strategy (LNRS) has informed ecological enhancement and mitigation as part of the masterplan.

2.9 Policy HA2 provides opportunities to secure biodiversity enhancements at a strategic scale through the delivery of green corridors, accessible natural greenspace and habitat creation. The scale of development allows ecological considerations to be addressed comprehensively through a masterplanned approach, ensuring biodiversity objectives are integrated into the development from the outset. This approach is consistent with the findings of the SA Update and the objectives of the Habitats Regulations Assessment (HRA) and facilitates compliance with the objectives of the Nature Recovery Network.





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2.10 The proposals also provide significant new recreational opportunities within the Site together with enhanced green links between the Ifield Brook Wood and Meadows Local Wildlife Site, retained habitats and newly created habitats, thereby helping to reduce recreational pressure on nearby designated sites.

- **Flood Risk and Climate Change Mitigation**

2.11 Flood risk has been fully assessed through the SFRA prepared in support of the Local Plan. The evidence demonstrates that development can be directed towards areas at lowest risk of flooding and supported by Sustainable Drainage Systems (SuDS) and other surface water management measures. The evidence base therefore demonstrates that the allocation is capable of being delivered without increasing flood risk elsewhere. In addition to this, site specific hydraulic modelling has been completed, in consultation with the Environment Agency.

2.12 The Council's assessment of reasonable alternatives demonstrates the sustainability benefits associated with locating development adjacent to Crawley, where residents can access employment, services, public transport and active travel networks. This supports reduced reliance on private car travel and contributes towards wider climate change mitigation objectives. Furthermore, the scale of the allocation provides opportunities for energy-efficient development, extensive green infrastructure and climate resilience measures to be incorporated from the outset.

- **Services including water and sewerage**

2.13 Water supply and wastewater infrastructure requirements have been considered through the Local Plan process and the supporting Infrastructure Delivery Plan (updated June 2026). The Council's assessment of reasonable alternatives highlights the importance of aligning growth with infrastructure provision, and the evidence base demonstrates that necessary water and wastewater infrastructure can be planned and delivered alongside development. Whilst upgrades may be required, neither the evidence base nor engagement with statutory undertakers identifies any constraint that would prevent delivery of the allocations within the plan period. The evidence base, alongside engagement with District Network Operators (DNOs) has not identified any major risk on power reservation to enable development.

2.14 Larger scale allocations, such as HA2 also enables infrastructure improvements to be planned and delivered comprehensively, ensuring that adequate utilities and services are provided as development comes forward. Accordingly, water supply and sewerage infrastructure do not undermine the soundness or deliverability of the allocation.

2.15 The principal constraints affecting allocations, including HA2 have been robustly assessed through the Sustainability Appraisal (SA), Strategic Housing and Economic Land Availability Assessment (SHELAA), Strategic Flood Risk Assessment (SFRA) and Habitats Regulations Assessment (HRA). These assessments informed both the site selection process and the Council's preferred spatial strategy and conclude that landscape, heritage, biodiversity and infrastructure considerations can be appropriately addressed through Policy HA2, strategic masterplanning and the planning application process. In particular:

- The **SA Update** identifies the sustainability benefits of strategic growth adjoining Crawley, including access to employment, services and sustainable transport.





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- The **SHELAA** confirms the site is suitable, available and capable of accommodating strategic development.
- The **SFRA** demonstrates that flood risk can be appropriately managed through site design and sustainable drainage measures.
- The **HRA** identifies mitigation measures capable of addressing potential ecological impacts.

2.16 Taken together, the evidence demonstrates that the identified constraints do not render the spatial strategy or HA2 unsuitable for allocation. Rather, they are capable of being effectively managed through the requirements set out in Strategic and Site Specific policy requirements.

iii. **Housing delivery: whether the range of sizes and types of site would ensure that:**

- **different housing needs and aspirations would be adequately met**
- **enough homes would come forward at the right time during the plan period to meet the housing requirement**

3.1 The Council's spatial strategy relies on a combination of strategic and non-strategic allocations. Strategic sites such as West of Ifield are essential because they provide a significant and resilient source of housing supply over the longer term, offering greater certainty of delivery than reliance on smaller allocations and windfall development. Homes England's experience of delivering large-scale residential and mixed-use developments nationally demonstrates the important role such allocations play in maintaining housing supply, supporting phased infrastructure provision and accommodating multiple delivery outlets.

3.2 The Sustainability Appraisal (SA) identified significant advantages associated with strategic-scale development, including the ability to deliver substantial numbers of homes in sustainable locations supported by infrastructure investment, and recognised strategic allocations as an important component of a deliverable housing strategy. The Strategic Housing and Economic Land Availability Assessment (SHELAA) confirms that West of Ifield is suitable and available for development, whilst the submission of Hybrid Planning Application DC/25/1312 provides further evidence of Homes England's commitment to bringing the site forward. The target housing mix has also been updated to reflect changing needs, including increased demand for family-sized accommodation in response to Crawley's over-supply of smaller homes.

3.3 Homes England considers that Policy HA2 makes a critical contribution to the soundness of the Horsham Local Plan by providing a strategic, flexible and deliverable site capable of meeting a broad range of housing needs throughout the plan period. The allocation can accommodate affordable housing, family housing, homes for older people, accessible and adaptable homes, self and custom build, build-to-rent and market housing. Delivery across multiple phases, parcels, developers and tenures will broaden market absorption, increase consumer choice and support a sustained rate of housing delivery. Accordingly, Policy HA2 strengthens the resilience of the Plan's housing supply and supports delivery of the District's housing requirement throughout the plan period.





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3.4 The allocation forms part of the Council's preferred spatial strategy, which was assessed through the Sustainability Appraisal and reviewed through the Sustainability Appraisal Addendum (July 2026). Those assessments considered reasonable alternatives and recognised the important role of strategic allocations in delivering substantial housing growth in sustainable locations. In that context, West of Ifield performs particularly strongly due to its accessibility, relationship with Crawley and capacity to support comprehensive infrastructure delivery.

3.5 Policy HA2 represents one of the most significant and sustainable opportunities for housing growth within Horsham District. Its location adjacent to Crawley, with access to major employment areas, rail services, public transport and community facilities, underpins its suitability as a strategic allocation and its ability to make a substantial contribution towards meeting the District's housing requirement.

3.6 Without allocation HA2 being included as part of the spatial strategy, the Plan would become increasingly reliant upon smaller allocations and windfall development, reducing certainty of delivery and increasing risk to the housing trajectory. The scale of the allocation enables delivery across multiple phases, parcels and outlets, providing flexibility and resilience within the housing supply. Homes England therefore considers that Policy HA2 materially strengthens the effectiveness, deliverability and robustness of the Local Plan and is essential to maintaining a flexible and reliable supply of housing throughout the plan period. Its inclusion is therefore justified by the evidence base, effective in supporting delivery of the housing requirement and consistent with national policy.

▪ Conclusion

4.1 Homes England supports the Council's spatial strategy and site selection and considers that the evidence base provides a robust analysis of reasonable alternatives. As part of this strategy, Policy HA2 is considered a fundamental component of the Plan's housing delivery strategy. The allocation is of sufficient scale and flexibility to:

- Deliver a broad range of housing sizes, types and tenures.
- Meet identified housing needs and aspirations across different sectors of the community.
- Support the provision of affordable housing and specialist housing needs.
- Enable delivery by multiple housebuilders and across multiple phases.
- Provide a significant and reliable contribution to housing supply throughout the plan period.
- Strengthen the robustness and deliverability of the Plan's overall housing trajectory.

4.2 Having regard to the Horsham District Local Plan Sustainability Appraisal Update (December 2023), the Horsham Local Plan Sustainability Appraisal Addendum (July 2026), the Site Assessment Report Update (June 2026), the Strategic Housing and Economic Land Availability Assessment and the Horsham District Local Plan 2023-2040 (January 2024), Homes England considers that the spatial strategy and site selection will ensure that different housing needs and aspirations are adequately met and that sufficient homes come forward at the right time to support delivery of the District's housing requirement.

4.3 The allocation of land West of Ifield is therefore strongly supported.

