

Horsham District Local Plan Examination: Crawley Borough Council Hearing Statement

September 2026

Matter 6: The soundness of the site allocations

Matter 6h: site HA(NP3): Kilnwood Vale Housing Allocation

- 1.1 Crawley Borough Council (CBC) notes the Kilnwood Vale Housing Allocation was introduced through the Main Modifications Consultation, carried out between July and August 2026. CBC submitted formal representations as part of this public consultation.
- 1.2 The comments made remain standing. This Hearing Statement only provides updates in response to the Inspector's question under Matter 6h: The soundness of the site allocations – site HA(NP3) Kilnwood Vale Housing Allocation.
- 1.3 CBC raises concern that further incremental development is now proposed west of Crawley without a longer term strategic vision for the whole wider area being prepared, as CBC sought at Reg 19 stage in relation to paragraph 10.84 of the HDLP, in accordance with National Planning Policy Framework (NPPF) (September 2023) paragraph 22, which states "*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*". This would also be in line with NPPF (August 2026) Plan-Making Policy PM2 (1) (a) (iii) which requires a vision for the plan area to reflect longer term expectations extending beyond the plan period where appropriate, and PM2 (1) (b) which confirms that Local Plans can cover a longer time period where this would help support the delivery of longer-term infrastructure or strategic development.

i. Transport and movement:

- *highway access arrangements*

- 1.4 The cumulative impacts of this site, along with the developments proposed in Mid Sussex district through the Mid Sussex District Plan have not been fully tested or understood in relation to its impacts on Crawley's infrastructure services and facilities. Whilst the proposed allocation is for 350 dwellings, this site is in addition to the existing Kilnwood Vale neighbourhood (2,500 dwellings) and the proposed strategic allocation of West of Ifield (3,000 dwellings).
- 1.5 The access from this site is anticipated to be from the site to the A264. It is not clear where the site access is intended to be – whether it is to go into the main Kilnwood Vale neighbourhood and use the existing site access or whether there will be a new access utilising the safeguarded area for the link road. This should be clarified in Policy HA(NP3).

- *the integration of sustainable transport*

- 1.6 The introductory paragraphs to the policy reference rail services, which are supported. CBC has been involved in significant work in relation to bringing forward a new railway station at Kilnwood Vale, between Crawley and Horsham stations. Clear evidence of the need for this provision in this location has been provided, and this should continue to form the priority for ensuring Kilnwood Vale forms a genuinely sustainable urban extension to Crawley. Therefore, the delivery of the Kilnwood Vale railway station should be confirmed as the preferred option to secure the sustainability of the site. However, notwithstanding this, the policy requirements should ensure that appropriate bus

services which would meet the anticipated public transport mode share without rail will be provided in the instance that the Kilnwood Vale railway station does not come forward.

- 1.7 Policy HA(NP3) should require the provision of strong pedestrian, cycle and wheeling connections are made into Kilnwood Vale neighbourhood, accessing the neighbourhood centre and public transport services.
- *future provision of the Crawley Western Multi-Modal Corridor (CWMMC)*
- 1.8 The Crawley Borough Local Plan 2023 to 2040 (the 'CBLP') paragraph 12.21 highlights that the need for a Western Link Road for Crawley has been recognised but has not yet come forward despite the development of Kilnwood Vale. The CBLP notes that if further urban extensions are proposed to the west of Crawley the route, design and delivery options for this multi-modal transport link will need to be addressed and achieved.
- 1.9 Paragraph 12.23ii. states that CBC will support urban extensions on or close to the western side of Crawley's administrative borough boundary where the scoping, design and delivery in full of the comprehensive Western Multi-Modal Transport Link (connecting from the A264 to the A23, north of County Oak) is agreed and provided prior to the completion of properties, unless otherwise agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils.
- 1.10 CBLP Policy ST4 provides further details for the section which would extend through Crawley borough and connect with the A23. The supporting text to this policy, paragraph 17.20 confirms that the transport modelling undertaken for the Crawley Borough Local Plan identified a number of junctions within the borough which were already at capacity or require mitigation following new development, without even taking account of either additional development outside of the borough, beyond existing adopted Local Plans, or the growth at Gatwick Airport relating to its Northern Runway Project.
- 1.11 A western multi-modal transport link would provide a new strategic transport route for travel from the west, and from Kilnwood Vale and any new development west of Crawley, enabling a link directly to the A23 north of County Oak serving Manor Royal and Gatwick Airport. This would remove the need for this traffic to come further east into Crawley and travel around all the roundabouts serving Crawley's western neighbourhoods to link with the A23, which will significantly exacerbate existing congestion on a route – known to be increasing at peak times.
- 1.12 A CWMMC link through Kilnwood Vale should have been safeguarded. However, this was 'lost' through the granting of planning permission for development over the safeguarded area, immediately before HDC considered further development to the west of Ifield.
- 1.13 It is not clear how the connection from the West of Ifield site and the A264 to the A23 is to be delivered through just safeguarding of the route. The route through the Kilnwood Vale extension should be accompanied by greater commitment and certainty for the delivery of the Multi-Modal Transport Corridor (CWMMC) as a full link, recognising its importance for any proposed strategic development to the west of Crawley. As a minimum, and assuming the additional Kilnwood Vale housing allocation is delivered prior to the proposed West of Ifield allocation, the development should design in the first part of this CMMC link, to enable delivery of a future connection from the A264 to the subsequent section within West of Ifield as part of the delivery of the proposed West of Ifield scheme.
- 1.14 Furthermore, it is not clear whether the Kilnwood Vale neighbourhood, through the extension, would be connected to the CWMMC link road and the CWMMC link road will

become the main access point on to the A264 for the neighbourhood, or whether the existing access on to the A264 will be retained as well. As above, the policy should require the Kilnwood Vale development to ensure in designing and delivering its access that the CWMMC can be delivered both to link the development to the A264 and so it can be expanded in future to meet the design standards required for the entire CWMMC multi-modal route, linking the A264 and A23. This should be integrated as part of the planned layout of the scheme. This would ensure it is fully considered from the start.

ii. Design, layout and facilities:

- *relationship with Crawley and its housing needs*

- 1.15 As this is an extension to the existing Kilnwood Vale neighbourhood and is in close proximity to Crawley, CBC contend that the site forms part of the urban extension to Crawley governed by the West of Bewbush Joint Area Action Plan. As such the housing mix and affordable housing should reflect the borough's needs, in addition to the Horsham district evidence, as was required through the Joint Area Action Plan. This requirement should be reflected in Policy HA(NP3), just as Policy HA2 requires for West of Ifield (should it be allocated) given its close proximity to Crawley, setting a 40% affordable housing requirement and meeting a blended mix of housing sizes based on evidence for Horsham and Crawley.

iii. Impacts and mitigation:

- *the maintenance of settlement separation*

- 1.16 CBC supports the provision of substantial structural landscaping to the southern and western boundaries to maintain separation and avoid coalescence.
- 1.17 CBC strongly advocates that, should development in this location be accepted, the sense of settlement separation between Horsham and Crawley, and a firm boundary to the development along its western edge must be secured through Policy HA2. CBLP paragraph 12.23iii. requires Crawley's character as a compact town within a countryside setting to be maintained. Furthermore, CBLP paragraph 12.23x. confirms development must be 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.

iv. Delivery:

- *Masterplanning and phasing*

- 1.18 CBC jointly prepared the West of Bewbush Area Action Plan with Horsham District Council due to the direct implications for the borough.
- 1.19 As this is an extension to the existing Kilnwood Vale neighbourhood governed by the Joint Area Action Plan, CBC contend that the site forms part of the same urban extension to Crawley. As such the scheme should reflect the borough's needs, in addition to the Horsham district evidence, as was required through the Joint Area Action Plan. In the absence of any further update to the JAAP, the Masterplan for this site should be agreed with CBC in addition to HDC.