

Hearing Statement on Strategic Policy HA2 Land West of Ifield

Examination of the Horsham District Local Plan 2023 to 2040

Matter Matter 6a Strategic Policy HA2 Land West of Ifield

Representor The Ifield Society

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Position of the Ifield Society

Revised 25 September 2026

Strategic Policy HA2 is not sound as modified. Horsham District Council has not demonstrated that approximately 2,500 homes can be delivered by 2040 without unacceptable harm, or that the necessary transport, environmental, infrastructure and cross-boundary mitigation can be adequately secured.

1 Introduction and request to the Inspector

1.1 This statement addresses Matter 6a and the Inspector's questions concerning transport, infrastructure, environmental effects, funding, phasing and delivery at Land West of Ifield. It should be read with the Ifield Society's duly made representations and its response to the Main Modifications.

1.2 The Society asks HDC to propose a further Main Modification deleting Policy HA2. If HDC does not do so, the Inspector should find the allocation unsound. If the Council requests recommendations for Main Modifications necessary to make the Plan sound, deletion of HA2 should be recommended. Only if a coherent and deliverable solution is established through the examination should retention be considered, with the Plan-period contribution limited to the amount supported by robust evidence and with binding requirements governing infrastructure, consent, phasing, funding and monitoring.

1.3 Hybrid planning application DC/25/1312 is a separate development-management process. The Society does not ask the Inspector to determine that application. It is, however, the most advanced practical test of the allocation and its statutory-consultee evidence is directly relevant to whether HA2 is justified, effective and deliverable.

1.4 On 16 September 2026 the Inspector declined the Society's adjournment request, explaining that the hearing should proceed, that he would not conclude on soundness

in October and that important later evidence would be considered with an opportunity for comment. The Society will participate and asks that Matter 6a remain open until final material evidence has been fairly tested, with further written comments or a focused hearing if necessary.

2 The soundness tests

2.1 The Plan is being examined against the National Planning Policy Framework applicable to this examination. It must be positively prepared, justified, effective and consistent with national policy. For HA2, the central questions are whether the modified allocation is supported by proportionate evidence and whether there is a reasonable prospect that it can be delivered during the Plan period.

2.2 The principal defect is effectiveness. HA2 depends upon transport and infrastructure in two local planning authority areas, decisions by several public bodies and works requiring separate land rights and consents. Those matters cannot be left as aspirations if the policy and housing trajectory depend upon them.

2.3 Legal and procedural requirements were considered during the April 2026 hearings. The Society does not ask the Inspector to reopen that general determination. The unresolved cross-boundary position is advanced as evidence that HA2 is not justified or effective as modified.

3 The modified housing figure is not supported by equivalent testing

3.1 Main Modification MM183 changes the anticipated Plan-period delivery from approximately 1,600 to approximately 2,500 homes. The additional 900 homes represent an increase of about 56 per cent. That change is strategically important to the housing trajectory and requires evidence addressing the effects and infrastructure needs of the higher figure.

3.2 HDCJB15a, the Council's June 2026 Transport Scenario Testing, inputs only 1,600 West of Ifield dwellings in every scenario. HDCJB15b therefore assesses the effects upon Crawley at 1,600 dwellings, not the approximately 2,500 now attributed to HA2 by MM183.

3.3 The Council should provide transparent, like-for-like testing of the additional 900 dwellings, using the same base year, trip generation, distribution, modal assumptions and mitigation as its preferred Local Plan scenario. Without that reconciliation, the policy and its evidence base refer to materially different levels of development.

4 Transport evidence and National Highways

4.1 HDCJB15b identifies increased congestion at several Crawley junctions under the Preferred Scenario, primarily because of West of Ifield. Its conclusions rely upon

sustainable-transport measures on the Ifield Avenue route and the Crawley Western Multi-Modal Corridor.

4.2 HDCJB15b records no funding or timetable for the southern and eastern sections of the corridor. Those sections would not be delivered during the Plan period through HA2 and would depend upon later development that would itself generate additional traffic. The full strategic corridor is therefore neither funded nor programmed through this allocation.

4.3 Homes England says that the full corridor is unnecessary. By contrast, the July 2023 HDC and CBC Statement of Common Ground records both authorities seeking a clear commitment to it. The Council must establish what infrastructure is essential for approximately 2,500 homes, who will provide it, when it must be operational, how it will be funded and what will happen if an element is delayed or refused.

4.4 National Highways' formal response of 11 September 2026, reference NH/25/12748, states that it is not yet possible to determine whether DC/25/1312 would have an unacceptable impact on the safety, reliability and operational efficiency of the Strategic Road Network. It recommends that planning permission should not be granted before 11 December 2026 while the outstanding matters are addressed.

4.5 Outstanding work concerns trip distribution, M23 Junction 11, modal-share assumptions and agreement with WSCC. These application questions test the same trip generation, modal shift, mitigation and network capacity upon which HA2 depends. HDC should reconcile the application and Plan assumptions and provide the final positions of National Highways, WSCC and CBC.

4.6 HDCJB15b(i), issued on 11 September after the Main Modifications consultation had closed, corrects the names of Crawley junctions in Tables 5.3, 5.6, 6.3 and 6.6. Although the numerical results did not change, the errors obscured the locations of the predicted effects and prevented representors from assessing the corrected geography during the consultation.

4.7 The corrected tables show substantial residual pressure after mitigation. Ifield Drive and Ifield Avenue reaches 110.09 per cent volume-to-capacity in the evening peak, while the A2011 and Crawley Avenue eastbound diverge reaches 111 per cent. At some locations, the result with mitigation is marginally worse than the unmitigated Local Plan scenario. HDC should explain those results, the quality assurance undertaken and the consequences for HA2.

5 Ifield Brook Meadows and the unsecured route

5.1 Ifield Brook Meadows lies within Crawley and is designated Local Green Space. Homes England says that it lies outside the HA2 development area, yet the proposed

walking and cycling connection towards Ifield Station crosses the Meadows. HDC has no jurisdiction to authorise development on that land.

5.2 Crawley Borough Council confirmed on 21 May 2026 that operational development for the route within Crawley requires a separate planning application. HDC subsequently confirmed that the route lies outside the DC/25/1312 red line. No separate application has been identified.

5.3 The Plan relies upon proximity and active-travel access to Ifield Station, but this direct connection has no secured planning permission. Its assumed modal benefit should not be counted unless land rights, design, environmental assessment, funding and a delivery timetable are demonstrated. Policy HA2 must also provide a feasible alternative if CBC refuses permission or the route cannot be delivered without unacceptable harm to the Local Green Space.

5.4 Crawley Borough Council's Green Infrastructure Supplementary Planning Document, May 2026, was adopted on 1 June 2026 and is material to any separate application within Crawley. Paragraphs 6.37 to 6.47 identify the West of Ifield Rural Fringe, including the Local Green Space and Local Wildlife Site, assign medium-to-high landscape value and sensitivity, require its special qualities and high-value features to be protected, and identify potential Local Nature Reserve status.

5.5 Paragraphs 6.48 to 6.51 require substantial weight to be given to harm to the Local Green Space and state that new buildings or infrastructure are inappropriate unless they enhance the value and local significance which make it special.

5.6 A walking and cycling connection might be advanced as an access enhancement, but the SPD does not predetermine that question. No separate application or CBC decision has established that the proposed surfaced and potentially illuminated route would enhance the Local Green Space, avoid unacceptable harm or satisfy Policy GI4. HDC cannot therefore treat the connection or attributed modal shift as secured; HA2 requires a deliverable alternative if permission is refused or the applicable tests cannot be met.

6 The cross boundary governance gap

6.1 The July 2023 HDC and CBC Statement of Common Ground anticipated comprehensive masterplans, a transport strategy satisfactory to both authorities, infrastructure controlled by legal-agreement targets and an outline application supported by both councils. Those outcomes have not been achieved: CBC maintained an in-principle objection to DC/25/1312, while HDC determines the principal application and CBC must determine important off-site works.

6.2 In IDJB09 the Inspector asks how effects outside HDC, including upon Crawley, will be mitigated and funded. No binding arrangement identifies what must be delivered, by

whom, when, with what funding, how performance will be monitored or what follows if mitigation fails.

6.3 The West of Bewbush Joint Area Action Plan is a relevant precedent for joint policy, infrastructure, phasing and monitoring. It does not make a West of Ifield JAAP compulsory, but HDC should explain why weaker governance would be effective for this larger cross-boundary proposal.

6.4 A future JAAP or supplementary document cannot repair an allocation that is unsound when adopted. Essential safeguards must be contained in HA2 or secured arrangements available for examination.

7 Infrastructure environmental constraints and funding

7.1 HA2 depends upon transport, education, healthcare, utilities, wastewater, drainage, community facilities, active travel and the long-term management of green infrastructure. These requirements are integral to delivery and must be reflected in cost, capacity, timing and occupation controls.

7.2 HDCJB19 describes several transport projects as essential but records costs and timescales as undetermined, generally expecting section 106 funding. A legal mechanism does not demonstrate that the package is viable, deliverable or supported by necessary land and consents.

7.3 Treasury business-case approval for early enabling works does not secure off-site permissions, establish all costs or demonstrate timely delivery for approximately 2,500 homes. HDC should identify delivery bodies, funding and occupation triggers for essential facilities and utilities.

7.4 Protected-species and veteran-tree constraints, potential harm to Ifield Court Moat and St Margaret's Church, and flood, drainage, wastewater and water-supply issues require feasible, funded solutions compatible with the trajectory.

7.5 On the evidence presently before the examination, HDC has not demonstrated that development pursuant to HA2 would avoid unacceptable harm, or that its transport, environmental, ecological and infrastructure impacts could be adequately mitigated. This includes the absence of evidence establishing that infrastructure through Ifield Brook Meadows would satisfy Crawley Local Plan Policy GI4 and paragraphs 6.48 to 6.51 of the adopted Green Infrastructure SPD. This does not assume that mitigation is impossible. It identifies the evidential conclusion that must be established before the allocation can be found sound.

8 Delivery trajectory and risk

8.1 HDCJB20 relies upon an applicant-led, overlapping programme totalling 3,000 homes, with no completions during 2027 to 2029 while enabling infrastructure is

constructed. The programme assumes timely planning permission, obligations, land assembly, detailed approvals, procurement, enabling works and off-site consents.

8.2 Public ownership and Homes England's infrastructure role may assist delivery, but they do not remove the critical-path risks. HDC should show what happens to the housing trajectory if planning permission, infrastructure or first occupation is delayed by one, two or three years.

9 Long-standing cross-boundary concerns

9.1 Newspaper reports of 19 December 2001 record exceptional concern about 2,500 homes west of Ifield. They do not determine soundness, but document the long-standing cross-boundary problem. Twenty-five years later, HA2 expects approximately 2,500 homes, the application seeks 3,000 and the wider vision reaches 10,000. Persistent transport, environmental, infrastructure and accountability concerns require current evidence and binding joint governance.

10 Assessment against the soundness tests

Test	Society's position	Reason
Positively prepared	Not demonstrated for HA2	The policy directs housing towards Crawley without resolving the transport, service and environmental consequences arising across the boundary.
Justified	No	MM183 raises delivery to approximately 2,500 homes while the transport evidence tests 1,600. The modified quantum is not supported by a consistent evidence base.
Effective	No	Essential infrastructure, cross-boundary permissions, funding, occupation triggers, monitoring and fallback arrangements are not secured. This is the principal defect.
Consistent with national policy	Not demonstrated	The policy lacks sufficient certainty on sustainable transport, infrastructure, Local Green Space, biodiversity, heritage, flood risk and delivery, including compliance with Crawley Policy GI4 and the adopted Green Infrastructure SPD.

11 Modifications required

11.1 The Society asks that Policy HA2 be deleted unless a sound and deliverable solution is demonstrated through the examination. If it is retained, the following minimum modifications are required:

1. Align the Plan-period contribution with like-for-like evidence. No more than 1,600 dwellings should be attributed to HA2 unless transparent transport, infrastructure and environmental evidence supports approximately 2,500 homes by 2040.
2. Define every essential section of the Crawley Western Multi-Modal Corridor and the associated cross-boundary mitigation, land requirements, funding, delivery bodies and occupation triggers.
3. Require a binding cross-boundary transport and infrastructure delivery plan agreed with CBC and WSCC, with a clear mechanism for monitoring and enforcement.
4. Prevent occupation that depends upon an off-site sustainable-access connection until the necessary consent, land rights, funding and delivery are secured, or an equivalent alternative is approved.
5. Make clear that Policy HA2 does not grant or presume permission for a route through Ifield Brook Meadows and require a deliverable alternative if CBC consent is not obtained.
6. Require any infrastructure affecting Ifield Brook Meadows to demonstrate compliance with Crawley Local Plan Policy GI4 and the protection and enhancement tests in paragraphs 6.48 to 6.51 of Crawley's adopted Green Infrastructure SPD before it is relied upon for access, modal shift or occupation.
7. Insert enforceable education, healthcare, wastewater, drainage, potable-water and community-infrastructure triggers, with identified delivery bodies and funding.
8. Require the development capacity and trajectory to incorporate ecological, heritage, landscape and flood-risk mitigation rather than leaving those matters to later stages.
9. Introduce monitoring and policy-review triggers if permission, infrastructure, first occupation or the annual housing trajectory is delayed.

11.2 The Society supports a Joint Area Action Plan involving HDC, CBC and WSCC. Any future joint plan would improve accountability, but it cannot substitute for the evidence and safeguards required before Policy HA2 is adopted.

12 Conclusion

12.1 The 2001 reports show that the cross-boundary consequences of major development west of Ifield have concerned this community for 25 years. DC/25/1312 and the latest consultee evidence now expose the continuing difference between allocating land and demonstrating that development can be delivered. Policy HA2

depends upon infrastructure, mitigation and cross-boundary decisions that are not wholly within HDC's control and have not been secured.

12.2 The combined position is decisive: MM183 increases anticipated delivery to approximately 2,500 homes; the Local Plan transport work tests 1,600; the corrected tables disclose residual congestion within Crawley; National Highways cannot yet reach a conclusion on the Strategic Road Network; Crawley's adopted Green Infrastructure SPD applies a strong protection and enhancement test to infrastructure within Ifield Brook Meadows; and important corridor sections, permissions and joint-delivery arrangements remain unresolved.

12.3 The October hearing should identify and test these matters, but Matter 6a should remain open until the final material evidence is available and the parties have had a fair opportunity to respond.

12.4 On the present evidence, HDC has not demonstrated that unacceptable harm would be avoided or adequately mitigated. Policy HA2 is therefore not justified or effective. HDC should propose a further Main Modification deleting HA2; otherwise, it should not be found sound.

12.5 If Policy HA2 is retained, its Plan-period contribution should be limited to the amount robustly tested and the policy should contain binding requirements for infrastructure, consent, funding, phasing, monitoring and fallback arrangements. A sound Plan must rest on a reasonable prospect of secured delivery, not an expectation that unresolved matters will be repaired after adoption.

Documents referred to

- IDJB06 Inspector's Guidance Note for the October 2026 hearings.
- IDJB07 Hearings Agenda for the October 2026 sessions, Matter 6a.
- IDJB09 Inspector's questions concerning cross-boundary mitigation and infrastructure funding.
- MMJB01 Schedule of Proposed Main Modifications, including MM183, MM189, MM192, MM194 and MM197 to MM200.
- HDCJB15a Horsham Local Plan Transport Assessment Scenario Testing, June 2026.
- HDCJB15b Horsham Local Plan 2040 Transport Assessment, June 2026.
- HDCJB15b(i) Horsham Local Plan Transport Assessment v4.0 Erratum, 11 September 2026.
- HDCJB19 Horsham District Council Infrastructure Delivery Plan, June 2026.
- HDCJB20 Horsham Housing Delivery Study Update, July 2026.

- HDCJB22 Housing Trajectory and Five Year Housing Land Supply Update, August 2026.
- HDC and CBC Statement of Common Ground, July 2023.
- West of Bewbush Joint Area Action Plan, adopted July 2009.
- Homes England hearing statement M6.04, including its transport position for West of Ifield.
- Hybrid planning application DC/25/1312 and consultation responses.
- National Highways formal response NH/25/12748 concerning DC/25/1312, 11 September 2026.
- CBC Planning Committee report concerning DC/25/1312, 1 December 2025.
- CBC correspondence dated 21 May 2026 and subsequent HDC officer correspondence concerning the separate consenting requirement for works within Crawley.
- Crawley Borough Council, Green Infrastructure Supplementary Planning Document, May 2026, adopted 1 June 2026, particularly paragraphs 6.37 to 6.51 and Local Plan Policy GI4.
- Programme Officer email of 16 September 2026 conveying the Inspector's response to the Society's adjournment request.
- Crawley Observer, Homes Meeting Turns Into Farce, 19 December 2001, and Crawley News, Mass Turnout Halts Meeting, 19 December 2001.