



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 6a: Strategic Policy HA2: Land West of Ifield

September 2026

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Matter 6a: Strategic Policy HA2: Land West of Ifield

i. Transport and Movement

The delivery and funding of the link road, safeguarding and areas of search

1. Policy HA2(2h) states that comprehensive sustainable travel improvements must include a first phase of the link road to connect the A264 at Faygate to the A23 north of Crawley. The supporting text (para 10.100) clarifies that the proposals include the development of a multi-modal route to be delivered within the site, to provide vehicular access into the development and facilitate sustainable transport within and to the site. Para 10.101 then explains that the proposal is unlikely to be able to deliver a full Crawley Western Multi-Modal Corridor (CWMMC) but that other requirements or funding for this route may emerge during the Plan period. An Area of Search (AoS) is therefore identified on the Policies Map, with Policy HA2(9) stating that no development may occur within this AoS that may prejudice the full CWMMC coming forward.
2. As such, the 'middle section' of the CWMMC (from Charlwood Road to the southern extent of the site) is to be delivered within the West of Ifield site by Homes England. A hybrid planning application was submitted to the Council in August 2025 (ref DC/25/1312), which incorporates a full application for the middle section. Homes England has confirmed in their representation that they will directly deliver the Phase 1 section (Comment ID /670). The planning application details how the CWMMC will be delivered in the first phase of development, alongside the construction of the new secondary school and open for use by buses, pedestrians and cyclists before any new home is occupied.
3. There is no confirmed funding for the later phases of the full CWMMC. As is made clear in the Plan text, this is expected to come forward in future as development continues to come forward beyond the Plan period. It should be emphasised that the full CWMMC is not required to mitigate the strategic highways impacts of the Plan. The updated **Horsham Local Plan Transport Assessment (HDCJB15b)** indicates that the highway network will continue to operate effectively on the assumption that the full CWMMC is not delivered within the Plan period.
4. **HDCJB15b** (para 6.5.3) does however indicate that operation of junctions within Crawley identified as requiring mitigation are all likely to benefit from the proposed (full) Crawley Western Multi-modal Corridor (CWMMC), and there would be reductions in congestion on some routes. Evidence suggests that additional network capacity would be required for any future (post-Plan period) strategic development, and that the full CWMMC can provide this. Furthermore, it is established common ground between the Council and Crawley Borough Council that the full CWMMC should be sought (see **Crawley Borough Council Statement of Common Ground (DC04)**). Thus, the Council considers it important to have regard to future impacts and ensure the ability to construct the full CWMMC in future is not prejudiced. This is consistent with para 22 of the (Sep 2023) NPPF which requires strategic policies proposing significant extensions to existing villages and towns to set a vision that looks at least 30 years ahead.
5. **MM189** and **MM200** propose to amend 'safeguarding' to 'area of search' to ensure due flexibility in the precise choice of route which will depend on future circumstances. It is also consistent terminology with the adopted Crawley Local Plan 2023-40.

The impact on the road system including Crawley

6. The Council considers that mitigation of impacts on Crawley's and wider road systems is prerequisite to significant development coming forward. The allocation policy sets out clear expectations to this effect, in parts 2h and 8. This should be read alongside Strategic Policy 24: Sustainable Transport (incorporating main modifications). Both policies make clear that a comprehensive transport assessment and travel plan will be required, with ongoing monitoring, to ensure appropriate mitigation.
7. The **Horsham Local Plan Transport Assessment (HDCJB15b)** includes Crawley within its area of study. The Assessment specifically examines the impacts of the emerging Horsham Local Plan on

Crawley, as shown in the **Erratum to the Transport Assessment (HDCJB15c)** Table 5-3, Table 5-6, Table 6-3 and Table 6-6. The tables show poorly-performing junctions in Crawley at or over capacity without the Local Plan developments (referred to as the '2040 Reference Case'). When compared with '2040 Local Plan Scenario' or '2040 Local Plan with mitigation', there is in most cases little difference when the Local Plan developments are added.

8. Nevertheless, paragraph 6.5.3 of **HDCJB15b** notes that a number of junctions within Crawley are shown to become more congested under with and without mitigation. This is primarily due to the West of Ifield Site. Ifield Avenue in Crawley is specifically mentioned, and sustainable transport measures are suggested as a measure to reduce the need for highway mitigation.
9. The Council is aware of transport model forecast evidence provided in the hybrid planning application which identifies the need to mitigate some junctions in Crawley. In line with Strategic Policies 23 and 24, applicants are, through the application process, Transport Assessment and emerging planning obligations, seeking to demonstrate that suitable provisions can be made to mitigate impacts on those junctions.
10. The Council recognises that it will also be important to ensure the ongoing monitoring of transport impacts. Tailoring of mitigation to fit future circumstances is seen as critical and will involve partnership working between the promoter and the three relevant councils (or any successor council). This will reflect the vision-led approach envisaged in the NPPF Policy TR3(1c) and the advice given in Department for Transport Circular 01/2022: Strategic Road Network and the Delivery of Sustainable Development¹ (paragraph 15 references 'vision and validate', 'decide and provide' and 'monitor and manage').

Sustainable transport and active travel measures and mitigation measures

11. The West of Ifield development provides an outstanding opportunity to achieve high levels of sustainable travel by modes other than private car. The Council has for some years been working with Homes England and has supported the concept and strategy of achieving both high levels of self-containment, and high take-up of non-car modes for sites both within and out of the site. As detailed in the **Site Assessment Report Part B (HDCJB14b)**, the scheme is designed as a '15-minute neighbourhood' whereby all day-to-day services and facilities are within a 15-minute walk or cycle ride for all residents. The proposed Neighbourhood Centre will have an urban nature, and be anchored by the primary school, secondary school, retail and leisure facilities and Mobility Hub all located in proximity to one another. The scheme is also expected to deliver a network of attractive, low- or no-traffic cycle and pedestrian routes providing links through the site and in to Crawley, including direct links to Ifield Station. The scheme also proposes to extend the Crawley Fastway bus service which will serve Crawley Town Centre, Gatwick Airport and Manor Royal Business Park. Priority will be made for Fastway buses including a bus gate at Rusper Road, giving buses more direct access into Crawley than private traffic.
12. The **Local Plan Transport Assessment (HDCJB15b pp32-33)** highlights the various bus priority measures that would support sustainable travel choices in the long term; the on-site measures listed broadly align with the emerging proposals in the planning application. These build on the close relationship of the site with Crawley which already has high-quality bus infrastructure and high bus patronage (which is credited to the success of its Bus Rapid Transit scheme, Fastway). It is close to Ifield Station, which would be improved via funding from the development. As an urban extension, it is also close to the many services, facilities and employment opportunities offered by Crawley and Gatwick, meaning good opportunities for cycling and active travel. Crawley Borough Council is expected to develop its Local Cycling and Walking Infrastructure Plan (LCWIP), and the West of Ifield provides opportunities to extend and develop this network, including funding.

¹ DtF Circular 01/2022 <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>

13. The allocation policy, in part 2h, sets an expectation of comprehensive sustainable travel improvements, high-quality bus service connections and sustainable travel options for first residents. Part 8 of the policy sets out the elements of a comprehensive transport strategy to be submitted, covering walking, cycling, integration with Crawley Fastway rapid transit bus network, electric vehicle provision and a comprehensive Travel Plan and Construction Travel Plan.
14. The CWMMC is being designed to prioritise bus and active travel. This is anticipated to be achieved through segregated bus and cycle lanes, low speed limits, and safe crossings for cyclists and pedestrians (who will have default right-of-way). It is, however, emphasised that the corridor will be designed to a standard which also allows it to accommodate through traffic as part of a future full link road from the A264 to the M23.
15. The Council has noted the WSCC representation on MM199 concerning the policy's sustainable travel criteria. The Council agrees that further clarity on the principle of funding off-site mitigations will improve effectiveness. The following addition to part 8 of the policy is therefore proposed:

8. A comprehensive transport strategy is submitted as part of the masterplan with development to include the following:

...[criteria a-e as modified by MM199]...

Proportional contributions will be sought towards off-site bus, rail station and active travel infrastructure, including in Crawley Borough, as agreed through the Travel Plan.

ii. The delivery of facilities and their funding and phasing, including:

Health, education

16. The policy requirement for schools has changed as a result of updated Census data. On the advice of West Sussex County Council, the Council proposes an amended Main Modification MM194:
 - 2.d)i. ~~two~~ one ~~2~~ 3-form entry primary school to incorporate support centres for special educational needs and disability (SEND)
 - 2.d)ii. ~~an~~ a ~~6~~ 8-form entry expandable to ~~10~~ 8-form entry secondary school, to incorporate special educational needs and disability (SEND)
17. The land for the secondary school forms part of the development site and is owned by Homes England. However, the sponsor for the school, and main delivery body, is the Department for Education. These two bodies have agreed that the secondary school will come forward in the earliest phase of development, with a planning application for the school expected to be submitted by the Department for Education following a positive determination of the Homes England application. It is understood that delivery of the secondary school is a priority for both Government and West Sussex County Council due to a severe shortage of places for Crawley students. Thus, the risk of delay to its delivery is considered minimal. A /
18. The primary school will be on land currently owned by Homes England and is expected to be delivered by West Sussex County Council.
19. Strategic Policy HA2 also requires provision of Special Educational Needs places (SEND) and early-years provision in the form of two new full-day care nurseries. SEND provision is factored into the cost and land budget for the secondary and primary schools, and there is a commitment from Homes England to provide additional funding to meet the further needs of the development. One of the nurseries will be provided as part of the primary school. The other is expected to come forward separately as part of the Neighbourhood Centre, with details on phasing to be determined through the Section 106 Agreement.

20. The allocation policy also requires that the development facilitates the delivery of local healthcare facilities which may include the provision of land, buildings and/or financial contributions. This is also supported in the Infrastructure Delivery Plan (albeit with an alternative option of improving or expanding Crawley surgeries). It is understood that the applicant is committed to providing the building to support this as part of the Neighbourhood Centre. It should be noted that the decision on where to locate new or expanded healthcare ultimately lies with NHS bodies including the NHS Sussex Integrated Care Board.

Retail

21. A Neighbourhood Centre will be provided as part of Phase 2 of the development, which is the first phase of residential development. This will be central to the development (both geographically and conceptually) with the aim of being the heart of the new community. Whilst details will fall to a future reserved matters application, it is expected to include a community centre, local leisure facility, small-format retail, early year nursery and potentially a hotel. These are provided for in the masterplan accompanying the planning application.
22. Regarding retail specifically, Strategic Policy HA2(2c) requires provision of approximately 3,300 sqm of retail space overall, and a medium-size food store. It is noted that the planning application proposes a maximum of 5,200 sqm, including a food store (c. 1,900 sqm), thereby aligning with the policy requirement. The planning application indicates delivery of the neighbourhood centre retail buildings in Phase 2 of development, whilst the Economic and Employment Strategy suggests that phasing of occupation will be linked to need arising from the growing community and market engagement.

Employment

23. Strategic Policy HA2(2d) requires the provision of around 2 hectares of employment floorspace to incorporate an enterprise and innovation centre, offices and other space falling into use classes E(c) and E(g), and also B2/B8 uses (general industry, warehouse and distribution). This will mostly be accommodated in a specific land parcel referred to in the planning application as 'River Valley' (although the enterprise and innovation centre will be located in the neighbourhood centre).
24. The planning application includes an Employment and Economic Development Strategy (EEDS). This sets out Homes England's approach to securing the delivery of a successful and sustainable employment hub. As with retail, the ever-changing nature of different types of employment demand and need requires a flexible onward approach based on partnership working, primarily with the private sector and also involving the local authorities. A framework Marketing Strategy has been appended to the EEDS, which will give foundation to a future full marketing strategy.
25. Indicative phasing has been shown in the EEDS. This shows the Innovation and Enterprise Centre coming forward in Phase 2. The River Valley employment is expected to come forward throughout the development build-out programme.
26. It is understood that Homes England are committed to submitting an Employment Delivery Strategy prior to commencing development on the employment land. This would include serviced employment land and marketing activities to support delivery of employment.

iii. Impacts and mitigation

The character and appearance of the area

27. The Council's main evidence on landscape is the **Landscape Capacity Study (EN08)**. This assessed the overall area as ranging from no/low to moderate-high capacity for development. The most sensitive areas are in the northern part of the site which in any case cannot be developed due to aircraft noise. The least sensitive area, with moderate capacity for development, is the current Ifield Golf Course forming the southern part of the site. The Council's assessment of landscape implications is in the **Site Assessment Report Part B (HDCJB14b)**.

28. The Council considers Strategic Policy HA2 to be a strong framework for ensuring the character and appearance of the area is respected, and where possible enhanced. Paragraph 10.95 highlights the landscape and heritage sensitivities and main features. The policy requires a comprehensive design code as prerequisite to development. Criterion 3 details key requirements of a landscape-led approach with main features for consideration highlighted.
29. The Council is aware of concerns regarding settlement coalescence, both in respect of nearby villages such as Rusper, and with the town of Horsham. Policy criterion 3(d) stresses the aim of maintaining the sense of settlement separation between Horsham and Crawley and achieving a strong natural landscaping on the western boundary of the site to provide a firm boundary to the development.
30. The Council has been heavily involved in work undertaken by Homes England to address the complex landscape and character sensitivities on this site. It is noted that the Masterplan submitted with the planning application is responsive to the physical landscape and is informed by a Landscape Visual Impact Assessment. Landscape and heritage assets have been considered as part of the Environment Impact Assessment as reported in the Environmental Statement. Mitigations identified include protecting and enhancing Ifield Brook Meadows, enhancing the character of the River Mole corridor by creating a linear park, protecting key views – particularly from the high ridge of land on the southern part of the golf course – and providing landscape connectors to provide a reference of the past to future development.
31. In summary, the policy will ensure that proposals coming forward are landscape-led, with a range of impacts on character considered. Whilst a development of this scale will inevitably have a significant impact on the area's character, the Council is confident that, by ensuring the policy criteria are met, the change in character can be managed effectively and long-term enhancements and benefits can be achieved – such as extensive new parkland and active management of the landscape going forward.

[Access to open space, including the closure of the golf course](#)

32. Strategic Policy HA2(g) requires provision of formal and informal open space, sport and recreation provision to meet the needs of the community. In addition, the provision of appropriate mitigation for loss of the Ifield Golf Club will be required.
33. The masterplan accompanying the planning application shows provision of the following to be delivered over the course of development build-out:
 - Multi-functional green space (e.g. parkland) - 74.6 hectares
 - Allotments - 1.3 hectares
 - Playgrounds and youth areas - 0.65 hectares
 - Grass football pitches - 7 pitches of varying sizes (2 Adult)
 - Artificial Grass Pitch - football - 1 full-size pitch
 - Artificial Grass Pitch – Multi-use Games Area - 1 pitch
 - Cricket pitch - 1 pitch with 7 wickets
 - Tennis and padel - 3 tennis courts, 2 padel courts
 - Secondary school open space - 6.9 hectares
34. Based on the details given in the planning application and its open space standards, the Council has calculated that a total minimum provision of c. 33 hectares of open space of various types will be required for the proposed 3,000 home development. This is against a total provision of c.99 hectares included in the hybrid planning application masterplan. Multi-functional greenspace is particularly well provided for, as the whole northern part of the site forming the River Mole corridor – essentially the part of the site lying within the area subject to greater aircraft noise – is given over to public parkland (with the proposed CWMMC running through it as an integrated landscape feature).
35. The open space provision is fixed in the parameter plans accompanying the planning application. The details of provision will be determined through reserved matters applications across the build-out period.

36. The closure of Ifield Golf Course is planned to be April 2027. There is consensus that the golf course is not, in planning terms, considered 'surplus to requirements'. Without mitigation, this would lead to a significant impact on the golfing community. There is therefore, a need to mitigate its loss, as set out in the allocation policy part 2(g). This is considered to be consistent with the requirements of NPPF paragraph 99 (Sep 2023), and Policy HC7 in the new Aug 2026 NPPF, which sets out the tests applied to the loss of recreational land and facilities.
37. The planning application includes a suite of documents collectively called the 'Golf Course Assessment'. The applicant has set out how it considers the provision of on-site leisure and sports facilities over and above what would normally be required demonstrates that alternative sports and recreational provision outweighs the loss of the current use. As well as the provisions listed in paragraph 33 above, the application proposes leisure centre facilities to incorporate 4-6 court halls, a swimming pool, 2-3 studios and a small health and fitness studio, although these (once built) would be marketed to external providers.
38. Furthermore, the applicant proposes to make a substantial financial contribution to other existing golf facilities within a reasonable distance to effectively create more capacity. This is intended to provide both for 'traditional' golfers (e.g. by extending the length of playing season through drainage improvements), and for those seeking more informal, affordable and accessible forms of golf such as short courses, 'adventure golf', enhanced practice facilities and golf simulators. It is therefore considered that provision of this information demonstrates that the policy is operating effectively, and that there is good prospect that mitigation can be achieved through the measures such as those included in the hybrid planning application.

Wildlife and biodiversity

39. The Council's assessment of impacts on biodiversity matters is set out in the **Site Assessment Report Part B (HDCJB14b)**. The site has a number of sensitive biodiversity assets and species-rich habitats. Of particular note are Ifield Brook Meadows, lying adjacent to the east of the site, Ifield Mill Stream Ancient Woodland, watercourses including the River Mole and Ifield Brook, and Hyde Hill Wood. House Copse SSSI lies some 650 metres south of the southern boundary. There is a breeding population of the rare Bechstein's Bat, with roosts present in and close to the site.
40. Strategic Policy HA2 therefore sets a clear framework for ensuring that development is designed sensitively in a way that protects the most sensitive habitats and minimises disruption to the protected and priority species present. Part 4 of the policy requires that proposals must provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Net Gain Plan, to demonstrate how net biodiversity gain (BNG) will be achieved on the site (the BNG target is revised from 12% to 10% to align with the new (Aug 2026) NPPF). The policy criteria specify a non-exhaustive list of key mitigations that are expected.
41. The Council is confident that the promoters of the site have worked diligently to ensure that impacts are mitigated as far as possible. The planning application includes a detailed Environmental Statement setting out the measures to be taken. The application also includes a Biodiversity Net Gain report detailing how an overall 10% BNG improvement can be achieved.
42. Significant work has been undertaken in partnership with Natural England to ensure the extent of built development is responsive to the roosting and foraging habits of the Bechstein's bats. Natural England has responded to the planning application consultation, noting its support for the parameter plans prepared by Homes England which secure buffers and the potential for (high-quality habitat to help mitigate the effects of development on the Hyde Hill Wood maternity colony. Whilst some detailed measures remain to be agreed, Natural England is supportive of the overall approach.

The setting of heritage assets

43. Analysis of impacts is set out in the **Site Assessment Report Part B (HDCJB14b)**. The setting of heritage assets has been a strong consideration in the Council's input into site masterplanning to reflect the emerging allocation policy. Part 3(c) of the policy requires that particular attention is given

to preserving and enhancing such assets, including the Ifield Conservation Area, the Grade I listed St Margaret's Church, and Ifield Court Scheduled Ancient Monument.

44. The Council has worked with Homes England to ensure that the masterplan now forming the basis for the planning application maintains a 'viewing corridor' through the development towards St Margaret's Church (which forms the dominant element of the conservation area). It is acknowledged that there will be a significant change in the way that the church and conservation area are perceived due to the presence of new development in relative proximity. The historic context and significance would continue to be experienced albeit there would be harmful impacts.
45. In considering planning applications, harm should be weighed against the public benefits arising from the scheme as described in HE6, paragraph 4 of the NPPF including cumulative impacts. It is noted that the Environmental Statement accompanying the current planning application includes a chapter addressing assessment of cultural heritage impacts. It is however considered that the policy framework provides the necessary provisions to enable the assessment of these impacts as part of this process, and that with mitigation factored in, impacts on heritage assets do not present a 'showstopper' to development.

Climate change mitigation, drainage, flood risk and utilities

Climate change mitigation

46. The **Site Assessment Report (HDCJB14b)** outlines the promoter's vision and approach to climate mitigation and energy, which the Council broadly supports. Key elements are the 15-minute neighbourhood design concept, provision of sustainable travel opportunities and on-site energy generation. An Energy Statement has been submitted in the planning application which considers how standards would be met with regards to energy sources and consumption and the technology supporting this. There is reliance on decarbonisation of the National Grid by 2050 in line with the Government's statutory net zero target.

Drainage and flood risk

47. As recorded in the **Site Assessment Report (HDCJB14b)**, the majority of the site lies within Flood Zone 1 with some land parcels in Flood Zones 2 and 3. The masterplan submitted with the planning application does not conclude development on any area of land classified as Flood Zone 2 or 3. Surface water flooding is present however this is considered to be mitigable by means of Sustainable Drainage Systems.
48. Under prevailing national policy at the time of submission, a **Sequential Test and Exceptions Test (CC04b)** has been undertaken in relation to the site allocations. These were updated in June 2026 to incorporate the main modifications – see the **Flood Risk Sequential and Exception Tests, HDCJB17**. The West of Ifield site is one of five proposed site allocations found through the sequential test to not be sequentially preferred when compared with alternatives, therefore requiring further assessment via an exceptions test as set out in NPPF (Sep 2023) paragraph 169. The outcome of this is set out in **HDCJB17** in **Appendix 3**. In summary, this finds that:
 - a) *the development would provide wider sustainability benefits to the community that outweigh the flood risk. This is because it significantly increases the supply of housing, is sustainably located adjacent to Crawley, provides a range of facilities within a neighbourhood community, and provides multi-modal access with active travel and bus links.*
 - b) *the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This takes into account that the masterplan doesn't include development in flood risk areas (and has been informed by site-specific flood risk assessment), will be expected to be supported by hydraulic modelling of the Upper Rover Mole, and can incorporate sustainable drainage systems.*

49. The Council can confirm that the measures outlined in (b) above are being undertaken for the planning application and have informed the proposed development.

Utilities

50. The **Infrastructure Delivery Plan (IDP) (HDCJB19)** notes that the Crawley Sewage Treatment Works were upgraded in 2024, at a cost of more than £34million. Nonetheless, Thames Water has highlighted that upgrades to both the wastewater network and sewerage treatment infrastructure will be required to support the proposed developments in the northern part of the district and particularly in relation to the Land West of Ifield development. Thames Water's response to the planning application indicates that the required capacity upgrades can be achieved through suitable conditions attached to any planning permission, to ensure development phasing to correspond to these upgrades.
51. With regards electricity supply, the **IDP (HDCJB19)** does not, on the basis of evidence from the supplier UK Power Networks, identify any site-specific barriers to development. It does however identify the need to reinforce the network at Bolney Grid substation (which is well to the south of the site) as a result of the cumulative impact of various developments and will form part of the supplier's business plan. The planning application includes a 'Utilities Report' that identifies specific works required to provide the capacity for the West of Ifield site relevant to the promoter's application for connection. The site will also provide a new primary sub-station. Overall, the Council is not aware of any concern regarding electricity supply to the site provided appropriate phasing is agreed through the development management process.

iv. Delivery

Masterplanning

52. The West of Ifield proposal has been developed over recent years with the input of the Council and Crawley Borough Council (which has input without prejudice to their objection in principle to the development). The concept is based around four 'character areas' plus a 'sports hub':
- **Neighbourhood Centre** – mixed use urban area and community hub.
 - **Hillside and Woodlands** – residential quarter led by landscape features: a ridge-line to the north, and ancient woodland to the south.
 - **The Meadows** – residential area defined by its centrepiece, Meadows Park, with the western part adjacent to the CWMMC to be more urban, and the eastern section lower in density and responding to the Ifield Brook and Ifield Meadows (a Local Nature Reserve).
 - **River Valley** – the employment area (albeit with a mix of uses), with a more urban and commercial character.
 - **The Grove Sports Hub** – outdoor sports pitches and clubhouse.
53. There is currently understood to be four main development phases which are broadly as follows:
- **First phase:** Crawley West Multi-Modal Corridor 'middle section' (currently at full application stage), and the new secondary school (subject to forthcoming separate application and Department for Education project timelines).
 - **Second phase:** Hillside and Woodlands residential quarter (currently Ifield Golf Course), the Neighbourhood Centre and The Grove Sports Hub.
 - **Third phase:** Southern parcels of The Meadows residential quarter and River Valley employment area.
 - **Fourth phase:** Northern part of The Meadows residential quarter.

54. The Planning and Affordable Housing Statement accompanying the planning application provides more details on the above. This will continue to evolve through subsequent reserved matters applications.

Commencement and build out rates

55. Details of the anticipated build-out of housing is detailed in the Council's Hearing Statement provided in response to **Matter 5: The Spatial Strategy and site selection**. The trajectory reflects the assumptions set out in the **Housing Delivery Report (HDCJB20)** which in paragraph 3.42 notes that the timetable provided by Homes England (HDCJB20 Table 3.5) has potential to slip from first delivery in 2029-30 to 2030-31.

56. Thus the delivery is anticipated to be as follows:

- Year 1: 2030-31 50 dwellings
- Year 2: 2031-32 150 dwellings
- Years 3-4: 2032-33 to 2033-34 250 dwellings p/a
- Years 5-10: 2034-35 to 2039-40 300 dwellings p/a

57. The delivery of 2,500 dwellings over a 10-year period is a greater rate of delivery than other strategic sites. This is supported by the analysis undertaken by Iceni Projects as reported in the **Housing Delivery Report (HDCJB20)** which recognises that Homes England has a range of mechanisms to accelerate housing delivery including diversification of housebuilders and financing, use of Modern Methods of Construction (MMC), and simplified procurement for housebuilders and contractors. The following excerpt from **HDCJB20** offers a summary of Iceni's further rationale (paragraph 3.46):

It is Iceni's view that the site is essentially an urban extension to Crawley, which is one of the larger towns in the region, a key economic node (with an expanding airport) and one which is underbounded (resulting in unmet need). The site is highly accessible to key employment locations including Manor Royal, Gatwick Airport and Crawley Town Centre. The intended early delivery of infrastructure, including both the multi-modal corridor and secondary school should help to support the pace of delivery (including through enabling the opening up of a range of development parcels). Crawley's affordability position (which is better than in other locations in Sussex) combined with the 40% affordable housing provision envisaged should also help to support the pace of absorption of homes.

Funding and phasing of infrastructure and mitigation measures

58. The timing of the phasing of both infrastructure and housing will become clearer at the point when the hybrid planning application is determined. This is now expected to be in late 2026 or early 2027.
59. Much of the 'big ticket' infrastructure will be delivered in the early phases of development when no or few homes have been occupied, to ensure they are available to the new community at or close to the outset. In particular, there is a commitment from the promoter, and detailed in the planning application, to deliver the Crawley Western Multi-Modal Corridor middle section to the point where it is being used by buses, cyclists and pedestrians prior to occupation of any new dwelling. The delivery of junction improvements in Crawley, off-site cycle routes/improvements, Ifield Station improvements, the Local Leisure Facility, Sports Hub and (if supported by NHS bodies) the Primary Healthcare facility is expected to be phased as appropriate to housing delivery, with details to be agreed through planning obligations and conditions. Land for the primary school is expected to be transferred at nil cost to the Local Education Authority and is due to be included in the first phase of development. The secondary school is to be provided by the Department for Education and, subject to the DfE project timeline, is expected to be built and operational early on in the development.

60. There are other mitigation measures which will be undertaken in accordance with the relevant strategies. For example, the Umbrella Travel Plan is proposed as a 'living document' which will provide a basis for developing sustainable accessibility and encourage the use of non-car modes – essentially helping to mitigate the impact of the development on local roads. It forms a framework for more detailed travel plans which will come forward with the various phases of development through reserved matters planning applications.
61. Similarly, the Phase 1 Ecological Mitigation Strategy details the required mitigation for ecological features of importance for the detailed design of phase 1 highways infrastructure. Other mitigation plans include the Surface Water Drainage Strategy, Outline Veteran Tree Compensation Strategy, Air Quality Emissions Mitigation Strategy, and a Biodiversity Net Gain Plan (to be secured by condition). A comprehensive Environmental Statement has been submitted with the planning application which makes recommendations on a range of environmental mitigations which will form the basis for conditions attached to any planning application.

Potential delivery impediments

62. The West of Ifield development is not without its complexities. There are environmental constraints that will require careful further consideration throughout the phasing of the development, however the submission of a comprehensive Environmental Statement as part of the planning application goes some way to mitigating related risks. As with any development at this scale, there are inevitable risks around market forces, in particular concerning the changing housing market and volatile macroeconomic conditions which are outside the control of both the Council and the promoter.
63. However, key to minimising delivery risks is the fact that the promoter/landowner and master developer is Homes England. As the Government's regeneration and development agency, they are uniquely placed to accelerate delivery of homes on the sites they control. It is understood that Homes England has secured commitment to full funding from the Treasury to fund the CWMMC, drainage and land compensation. Clearly this significantly de-risks forward funding of works necessary ahead of housing delivery.

Further Proposed Modifications

64. As set out in this statement, in light of representations received the Council is proposing some further changes to Main Modifications that have been consulted upon (document **MMJB01**). In relation to West of Ifield and Strategic Policy HA2, these are shown in the table below.

Paragraph/ Policy Number	Suggested Change	Reason
HA2(2)	Amend Criterion 2 sub-criteria d(i) and d(ii) (as originally modified by MM194) to read: <i>2.d)i. ~~two~~ <u>one</u> 2 3-form entry primary school to incorporate support centres for special educational needs and disability (SEND)</i> <i>2.d)ii. ~~an 8~~ <u>a</u> 6-form entry expandable to ~~10~~ 8-form entry secondary school, to incorporate special educational needs and disability (SEND)</i>	To reflect updated advice from West Sussex County Council (arising from updated Census data).
HA2(8)	Amend Criterion 8 (as originally modified by MM199) to include a new concluding sentence to follow sub-criteria a to e: <i>8. A comprehensive transport strategy is submitted as part of the masterplan with development to include the following:</i> <i>...[criteria a-e as modified by MM199]...</i> <u><i>Proportional contributions will be sought towards off-site bus, rail station and active travel infrastructure, including in Crawley Borough, as agreed through the Travel Plan.</i></u>	To make that contributions will be sought towards off-site mitigation measures. (WSCC representation)