

Horsham District Local Plan Examination: Crawley Borough Council Hearing Statement

September 2026

Matter 6: The soundness of the site allocations

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

- 1.1 Crawley Borough Council (CBC) submitted representations (Response #1194005 [Crawley Borough Council Response - Horsham District Local Plan 2023 - 2040 \(Regulation 19\)](#)) to the submission draft Horsham District Local Plan (HDLP) Regulation 19 consultation (March 2024). Representations were made through Examination Hearing Statements (April 2026) and as part of the formal Main Modifications consultation (August 2026). These comments, which set out CBC's objection to the West of Ifield (Wol) allocation, remain.
- 1.2 This Hearing Statement provides CBC's response to the Inspector's questions under Matter 6a.

i. Transport and movement:

- *the delivery and funding of the link road, safeguarding and areas of search*
- 1.3 The [Crawley Borough Local Plan 2023 to 2040](#) ('CBLP') paragraph 12.21 highlights the need for a Crawley Western Multi-Modal Corridor Link (CWMMC). This has not come forward despite the development of Kilnwood Vale. The CBLP recognises that if urban extensions are proposed to the west of Crawley, including development Wol, then the route, design and delivery options for this multi-modal transport link will need to be addressed.
 - 1.4 CBLP paragraph 12.23ii. states CBC will support urban extensions on or close to the western side of Crawley's borough boundary where the scoping, design and delivery of the comprehensive CWMMC (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.
 - 1.5 CBLP Policy ST4 provides details for the section which would extend through Crawley borough. The supporting text to this policy, paragraph 17.20, confirms the CBLP transport modelling identified a number of junctions within the borough which are at capacity or require mitigation following new development. This was neither factoring in additional development outside of the borough, beyond adopted Local Plans, nor the Northern Runway Project growth at Gatwick Airport.
 - 1.6 A full CWMMC link would provide a new strategic route for travel from the west, from Kilnwood Vale and any new development west of Crawley to link to the A23 north of County Oak, serving Manor Royal and Gatwick Airport. This would remove the need for traffic to come east into Crawley via Crawley's western neighbourhoods to link with the A23, a route which is congested at peak times.
 - 1.7 The [Horsham Local Plan Transport Assessment 2040](#) (TA) confirms junctions within Crawley identified as requiring mitigation would all benefit from the proposed CWMMC with a reduction of traffic and congestion along the A2220 Horsham Road, the A23 Crawley Avenue and Ifield Avenue. However, it is noted there is currently no funding or timeline for the southern and eastern sections the CWMMC. Therefore, this will not be realised within the Plan period through the Wol allocation within the Plan, as drafted. It

would only come forward should extensive further phases to Wol be progressed, which will generate their own traffic reducing the net relief effect (paragraph 6.5.3).

- 1.8 The CWMMC scheme is a medium-term priority in the West Sussex Transport Plan (2022 to 2036) which coincides with the proposed delivery of Wol. Therefore, CBC believes, if development Wol is allocated, the HDLP should provide commitment and certainty for the delivery of the CWMMC as a full link, recognising its importance for any proposed strategic development to the west of Crawley. The HDLP should establish a requirement for the developer of the proposed Strategic Site to source funding for the CWMMC and deliver it in order to prevent all traffic coming in through Crawley's neighbourhood and already congested junctions.

- *the impact on the road system including Crawley*

- 1.9 The TA confirms Crawley borough is included in the Fully Modelled Area, and includes the area to the east of Crawley which is subject to the proposed Strategic Development at Crabtree Park and to the south including Pease Pottage. However, it is understood the numbers and locations of additional development allocations proposed in this area through the emerging Mid Sussex District Plan are not included (Figure 3-1, paragraph 3.3.16).
- 1.10 The TA confirms roads on the western side of Crawley are among those with the largest flow increases. Some flow decreases are seen on the A264 between Crawley and Horsham due to the HDLP development causing congestion at some of the junctions diverting traffic elsewhere.
- 1.11 Congestion increases at a number of Crawley's junctions within the Preferred Scenario, primarily due to the Wol Site (paragraph 6.51, Figure 5-3, Table 5-3, Table 5-6, Table 6-3, Table 6-6). No mitigation is proposed to these junctions, yet there are additional impacts arising from the HDLP developments which is a significant concern to CBC.
- 1.12 The [Horsham Local Plan Transport Scenario Testing](#) (Reference HDCJB15a) identifies Wol in all scenarios. The testing confirms even in Scenario A there are some effects which extend beyond the district boundary. A significant number of the junctions impacted by a volume over capacity ratio exceeding 100 in the Reference Case and increasing over 5% fall within Crawley borough. This continues to be exacerbated with the subsequent scenarios.

Impacts on the Strategic Road Network (A23/M23 junctions)

- 1.13 The TA confirms notable increases in merge flows, with the M23 Junction 9 South Bound merge in the PM peak reporting approximately 30% increase. However, it confirms the current layout at Junction 9 on all merges and diverges is sufficient to facilitate traffic arising from the HDLP. Some mitigations including changing signal timings are required for M23 Junctions 10 and 11.
- 1.14 The TA confirms the A23 is already over capacity within the Reference Case model due to the amount of additional traffic being added from south coast towns travelling north towards the M25 and London, as well as growth from Mid Sussex and Crawley.
- 1.15 The merge-diverge assessments show a number of locations, including M23 Junction 11 Pease Pottage southbound, where the current layouts are not sufficient to accommodate the forecast growth. However, it is suggested the Reference Case traffic growth causes the issues. The outcomes of this should be discussed further with National Highways to ensure mitigation is secured. This mitigation should be secured before the site is progressed.

- *sustainable transport and active travel measures and mitigation measures*

- 1.16 The sustainable and active travel measures indicated for Wol, set out in the TA are noted and welcomed. These are considered to be essential to minimise the impacts of traffic on the local transport network within Crawley borough.
- 1.17 This modal share assumes a high percentage car trip reduction of 12% to 15% from Wol to Crawley Town Centre (Table 4-2). The largest additional reduction on trips from sustainable measures is seen from the Wol site due to the trips within the zone having a shorter distance (predominately to and from Crawley).
- 1.18 Therefore, Policy HA2 must ensure the delivery of high quality, high-priority bus provision, and strong active travel connections continuing beyond the edge of the development to destinations including Crawley Town Centre, Manor Royal and Gatwick Airport. These are critical to ensure the modal share anticipated by the TA is met. Monitor and Manage must be in place to ensure alternative action can be taken if this is proven otherwise. CBC request to be involved in these decisions.

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

- *health, education*

- 1.19 Notwithstanding CBC's in-principle objection to strategic development at Wol, should the allocation be accepted through the HDLP Examination, the importance of early delivery of the education facilities, particularly the secondary school in order to meet the evidenced unmet needs for Crawley residents is highlighted and should be required by HA2.
- 1.20 Similarly, should strategic development in this location be accepted, early delivery of a sufficient quantum of health-care facilities should be secured through the policy. CBLP paragraph 12.23vii. confirms the council would support development which helps address unmet development needs arising from Crawley, including in relation to health needs. Experiences with both Kilnwood Vale in Horsham and Forge Wood in Crawley left the borough with insufficient health facilities. Neither of these new neighbourhoods delivered new health provision, despite their respective planned proposals including facilities.

- *retail*

- 1.21 CBC confirms any strategic development allocated immediately adjacent to Crawley's borough boundaries through a sound local plan should follow Crawley New Town neighbourhood principle, whereby each neighbourhood centre provides its own local shops in a dedicated neighbourhood parade, alongside facilities and services supporting the day-to-day needs of its residents (CBLP paragraph 12.23 vi). The neighbourhood principle is a key aspect in defining Crawley's character, as recognised in CBLP Strategic Policy CL1. Should Wol come forward as an urban extension to Crawley, Policy HA2 should require it to be delivered in full accordance with Crawley New Town neighbourhood principles with a defined neighbourhood centre.
- 1.22 The retail floorspace proposed should be of an appropriate scale and function to provide a local neighbourhood offer and should not result in significant adverse impacts on Crawley's town centre and nearby neighbourhood centres, community and social facilities. CBC notes the quantum of retail floorspace (3,300sqm) proposed in Policy HA2 is broadly in-line with that of Crawley's neighbourhood centres. However, the neighbourhood centre should not include capacity beyond that necessary to meet the day-to-day needs of residents where it would have a negative impact on the Crawley's western neighbourhood centres or Crawley Town Centre.

- *employment*

- 1.23 CBC confirms it doesn't have any unmet employment development needs. Should the proposed Wol allocation be found to be sound, the principle of the urban extension providing a quantum of business floorspace is supported. The Crawley/Horsham Statement of Common Ground (DC04), paragraph 5.8, confirms the approaches taken to employment growth in the respective CBLP and emerging HDLP provide a complementary role in ensuring economic growth is maximised and a variety of opportunities are provided within the NWS Functional Economic Area for existing businesses, business growth, business start-up and labour supply.

iii. Impacts and mitigation:

- *the character and appearance of the area*

- 1.24 CBC maintains its strong objection to the site at Wol being developed. This location is extremely sensitive in the setting of Crawley as a compact town in a countryside setting. CBC maintains this location is inappropriate for strategic development. Development located immediately west of Ifield Brook, only securing the buffer to the ancient woodland, would be significantly urbanising and visually intrusive due to the flat topography, existing lengthy visual distances and countryside views across the area.
- 1.25 The land within Crawley along Ifield Brook is a sensitive, highly valued Local Green Space "Ifield Brook Meadows and Rusper Road Playing Fields", designated in CBLP Policy GI4. CBC is concerned development allocated immediately west of Ifield Brook will be significantly harmful to the purposes of the site's designations.
- 1.26 Policy GI4 confirms: "This area is designated due to its value to the local community and local significance in its function as an area for enjoyment of recreation, visual amenity, tranquillity, wildlife, heritage, and highly accessible countryside close to the urban area"... and it "...will be safeguarded from development other than in very special circumstances or where the development is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife".
- 1.27 Part of the value of the Local Green Space is the tranquillity and rural setting it provides to the historic Ifield Village Conservation Area, and the access it gives to the Sussex countryside beyond Ifield Brook. Strategic development would significantly and negatively impact on these values. Therefore, CBC strongly objects to development of the fields to the western side of the borough beyond Ifield Brook.
- 1.28 Should development be considered in this location, it is essential Policy HA2 requires the important values of the area and the impacts on it to be considered in determining design, building layouts and heights, landscaping, buffer zones and linkages. This should include a substantial buffer to the western side of Ifield Brook of the same width as Ifield Brook Meadows to the east, allowing the fields to maintain the countryside setting. In addition, it would be essential that strategic development would not rely on urbanised access through the Local Green Space, harming the natural character of the area.
- 1.29 CBC strongly advocates, 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.

- *access to open space, including the closure of the golf course*

Ifield Golf Course Closure

- 1.30 CBC is concerned an allocation in this location would result in the loss of golf facilities without fully understanding how these would be replaced and compensated for.
- 1.31 Ifield Golf Course (IGC) forms part of the provision for Crawley residents, identified within the Crawley Playing Pitch Strategy. It cannot be considered to be surplus to requirements. On this basis, CBC strongly maintains Policy HA2 should secure appropriate mitigation for the loss of IGC, and provision of higher order golf facilities suitable for the local population and members of IGC, should Wol continue to be allocated in the HDLP.

Access to the countryside

- 1.32 This location is a critical, valued and unique area for Crawley connecting the neighbourhoods within the west of the borough and from the town centre out into the countryside, both physically and visually. It offers Crawley residents one of the best opportunities to access the wider West Sussex countryside. Proposed development in this location would have a significantly detrimental impact on this resource, and should it continue to be progressed, Policy HA2 should ensure any design must mitigate against such negative impact.
- 1.33 CBLP Paragraph 12.23viii. confirms the council will support development where linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active travel and visual links).
- 1.34 Therefore, should Wol continue to be allocated in the HDLP, Policy HA2 should require a network of nature paths and Rights of Way throughout the development and accessing the wider countryside beyond to be maintained, integrating with existing public rights of way.

- *wildlife and biodiversity*

- 1.35 Within Crawley, Ifield Brook Meadows is a designated Local Wildlife Site. CBLP paragraph 12.23xii. confirms development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity. This should be reflected in Policy HA2.

- *the setting of heritage assets*

- 1.36 Critical heritage assets in this location include Ifield Village Conservation Area, the Grade I Listed St Margaret's Church and its wider setting, Ifield Court (Scheduled Ancient Monument) and historic field patterns. The proposed Wol site is located immediately adjacent to Ifield Village Conservation Area and provides the wider historic rural setting and context for the Village and the Grade I Listed Church. Proposed development in this location would have a significantly detrimental impact on this resource, and any design, should it continue to be progressed, must be required through Policy HA2 to mitigate against such negative impact. Critically, CBC strongly objects to significant development of the fields immediately west of the borough's boundaries close to the Listed Church.
- 1.37 CBLP paragraph 12.23 ix. requires a landscape character, setting and heritage appraisal to be undertaken to ensure development is planned to ensure key landscape features, heritage assets, character areas, areas of tranquillity and settings are protected, and the

way they can be experienced is enhanced. Policy HA2 should require such an appraisal as, without a comprehensive heritage and character assessment clearly understanding and setting out the design and capacity constraints of this location, the negative impacts of such development could not be fully understood nor mitigated against. The policy requirements should be fully implemented, including a sufficient degree of mitigation.

- *climate change mitigation, drainage, flood risk and utilities*

- 1.38 CBLP paragraph 12.23i confirms development proposals must not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of flooding and drainage.
- 1.39 The Wol site, as well as adjacent land within Crawley, is subject to flooding. Policy HA2 should require development to demonstrate it will reduce the potential for flood events in the area, should Wol continue to be allocated in the HDLP.

iv. Delivery:

- *masterplanning*

- 1.40 CBLP paragraph 12.22 confirms: "...Development should only come forward through a Plan-Led process, supported by clear cross-boundary and site-specific Local Plan policies. Where appropriate, Joint Area Action Plans would provide the most robust way to ensure Crawley's needs and concerns are fully addressed. Proposals should be supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council)".
- 1.41 In the absence of a JAAP/Supplementary Plan being required, CBC requests that the policy confirms the Masterplan for this site would be subject to CBC's consideration and agreement in addition to HDC. Such a Masterplan should be agreed before any outline planning consent is granted.

- *funding and phasing of infrastructure and mitigation measures*

- 1.42 CBC maintains its significant concern about the high level of uncertainty surrounding the prospects of delivering the CWMMC as a full link – concern which is exacerbated by the complete absence of commitments to any improvements to the already at capacity junctions within Crawley borough.
- 1.43 In light of this, it is considered critical that the sustainable transport and active travel measures, used to determine the modal shares included in the Horsham TA, are brought forward as a matter of urgency ahead of any occupation within the site, should it be allocated.