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**Our Ref:** CR/2023/3002/EIA  
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FAO Jason Hawkes

Dear Jason

**TOWN AND COUNTRY PLANNING ACTS**

**LOCATION: LAND WEST OF IFIELD**

**PROPOSAL: REQUEST FROM HORSHAM DISTRICT COUNCIL TO CRAWLEY BOROUGH COUNCIL FOR COMMENTS ON THE SUBMITTED ENVIRONMENTAL IMPACT ASSESSMENT SCOPING OPINION FOR DEVELOPMENT ON LAND WEST OF IFIELD (HDC REF EIA/23/0007)**

I write with reference to your letter dated 19<sup>th</sup> October seeking the views of Crawley Borough Council (CBC) on the information to be included in the Environmental Statement (ES) that would be submitted by Homes England to accompany any planning application for development on land 'West of Ifield'.

CBC note that the applicants have requested an update on the Scoping Opinion issued by HDC on 20<sup>th</sup> November 2020 in the light of a revised planning strategy, delays to the Local Plan review and in respect of challenges with regard to Water Neutrality.

Having reviewed the document, there are no references within the Scoping report to the issue of Water Neutrality. This is surprising given the impact of the increased water demand from a development of this scale on the Arun Valley SAC, Arun Valley SPA and Arun Valley Ramsar sites, which are all within the Sussex North Water Supply Zone, and given the requirement to address this matter to ensure compliance with the Habitat Regulations. CBC would expect to see this matter fully scoped into the Environmental Statement.

CBC note that the red edged site boundary has been reduced (reference figure 2.1) and has sought to exclude all land within the borough boundary with the exception of a linear east to west route from Ifield Brook, across Ifield Meadows, to Rusper Road at its junction with Rudgwick Road. This is disappointing as it suggests that the applicants are seeking to avoid a cross boundary planning application involving the Borough Council, despite the fact that the applicant's land holding does extend into the borough. Notwithstanding this, it is considered that the proposed development would have very significant impacts for Crawley and its residents and, while the applicants appear to be seeking to minimise development within the borough, substantial weight should be afforded to the comments made by CBC in this response as the directly impacted neighbouring authority.

CBC provided a very detailed response to the original Scoping request back in October 2020. Unfortunately, due to work pressures including the imminent Local Plan examination and ongoing Gatwick Northern Runway DCO commitments, the key officers who have previously been involved in this project have not had the time to review the proposal to the same level of detail given the limited time

constraints for responding to such a request. This response therefore addresses only high level information and key omissions. Reference should also be made to the Council's previous response.

### Site Context

CBC still has serious concerns that the Scoping report does not explain accurately or address the context of the development in the wider area. The removal of the applicants' land (effectively moving the red edge away from the borough boundary) does not negate the need to acknowledge and thoroughly understand the context of the development site and its relationship to the borough boundary and, in particular, in relation to Ifield neighbourhood and Ifield West. The new development would either abut and /or need to connect into these areas of Crawley at the southern and eastern edge of the site. The previous comments made in Part 2 of the previous **CBC Scoping Response** therefore remain relevant please see link:

<https://planningregister.crawley.gov.uk/Planning/Display/CR/2020/3002/EIA#SupportingDocumentsTab>

Further information on the importance of the understanding of site context is also set out in policies CL2, CL3, CL4 and CL5 in the emerging Local Plan (pages 44- 55) [1. Submission Crawley Borough Local Plan 2024-2040 May 2023.pdf](#)

### The proposed development

CBC welcome the applicant's revised approach to submitting a hybrid application which will detail the principal elements in 'outline' and seek full planning permission for the enabling infrastructure works. Delivery of the infrastructure to support any development of this scale and magnitude is key, given the existing pressures on Crawley's highway infrastructure and the obvious environmental constraints of the site, such as the River Mole and its floodplain. It is still not clear whether the entire route of the proposed Crawley western corridor would be included as part of the full application or whether it would just be the key junctions at the north (Charlwood Road) and south (Rusper Road). The proposed wording of the hybrid application (para 3.1.4) is ambiguous and the extent of phases 1a and 1b are not clear from the report or accompanying plan. CBC wish to reiterate that it is vital that there is certainty that all key elements of the road and transport infrastructure are capable of being comprehensively delivered at the earliest stages of any development, to avoid traffic and congestion within neighbourhoods such as Ifield and to ensure active travel options and bus routes to serve the site are established at the earliest opportunity.

### Transport

The CBC position is that if development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Multi-Modal Transport Link (connecting from the A264 to the A23, north of County Oak (draft Local Plan Policy ST4) should be 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. Furthermore, CBC wish to ensure that the junction design future proofs this infrastructure and that the development does not impede the wider delivery of this transport link. The comments in respect of cycling and active travel remain relevant and were highlighted in Part 14 of the previous CBC Scoping response. Similarly an effective reliable high quality bus service to/from Crawley, including Manor Royal and Gatwick, should be integral to transport strategy and the appropriate infrastructure designed into the enabling infrastructure works.

### Heritage

It is noted on table 9.2 that a number of points raised by the CBC Heritage Advisor are considered by the applicants to be landscape matters and it is accepted that there is clearly some overlap between these subject areas. CBC would wish to ensure that the points raised are transferred between the chapters and appropriately addressed in the scoping report.

### Cumulative impacts

The Gatwick Northern Runway DCO is for up to 80.2 million passengers per annum, not 74 million as quoted. Further details are available here:

<https://infrastructure.planninginspectorate.gov.uk/projects/South%20East/Gatwick-Airport-Northern-Runway> .

Other cumulative impacts that should be included are detailed. However, the list provided is quite out of date with some developments now constructed and newer proposals omitted. This list should be reviewed separately by the applicant.

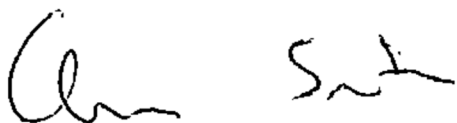
#### Timing and Local Plan review

Reference should be made to the policies of the Draft Crawley Borough Local Plan 2024-2040, which has been submitted for examination and for which the hearings commence on 21 November. These policies are considered to have increasing weight, have not been referenced in many chapters of the Scoping Report and must be considered. A link to this document is here:

<https://crawley.gov.uk/sites/default/files/2023-05/1.%20Submission%20Crawley%20Borough%20Local%20Plan%202024-2040%20May%202023.pdf>

CBC note reference in paragraph 1.5.4 to an HDC document 'Facilitating Appropriate Development.' It is unclear whether the applicants intend to rely upon this to progress an application prior to the Regulation 19 consultation and outcome of the Horsham Local Plan review. While the timing of the planning application is not explicitly stated, CBC has serious concerns about the progression of any planning application ahead of the adoption of the new Horsham District Local Plan. If allocated, a development of such as scale must take into account the detailed policy requirements (if allocated by HDC) and the consultation responses received as part of the Local Plan process, along with any modifications made during Examination. Until the outcome of the HDC Local Plan process is known, any application would be premature as it could not be certain that it would comply in detail the policies relevant for any future allocation.

Yours faithfully



Clem Smith  
Head of Economy and Planning Services