



Homes
England

The Housing and Regeneration Agency

West of Ifield, Crawley **Planning Statement (incl. Affordable Housing Statement)**

WOI-HPA-DOC-PS-01
Version 1 - Planning submission

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1. Introduction

1.1 Purpose of the Document

- 1.1.1 This Planning Statement has been prepared by Prior + Partners on behalf of Homes England (the "Applicant") as part of a Hybrid Planning Application ("the HPA" or "the Application") for the development of West of Ifield (the "Proposed Development"). The area subject to the Proposed Development ("the Application Site" or "the Site") is shown on the submitted Planning Application Boundary Plan (drawing ref. **WOI-HPA-PLAN-PAB-01**).
- 1.1.2 The Application is submitted to Horsham District Council (HDC) as the determining local planning authority (LPA) under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 1.1.3 The Proposed Development seeks to deliver a mixed-use neighbourhood that creates value and benefit to local communities, including the delivery of the first phase of the Crawley Western Multi Modal Corridor (CWMMC) to facilitate the early delivery of a secondary school to meet an immediate need identified by West Sussex County Council (WSCC).
- 1.1.4 The Site was proposed as a draft strategic site allocation in the Horsham Local Plan 2023 – 2040 and is supported by a significant amount of HDC evidence demonstrating the Site is suitable and capable of delivering development of scale.
- 1.1.5 Importantly, the HPA responds to the acute need for housing in HDC and is uniquely located to assist in playing an integral part of the future growth for both Horsham and Crawley.
- 1.1.6 According to HDC's latest evidence base, HDC are unable to demonstrate a five year housing land supply of deliverable housing (confirmed to equate to a 1-year supply of new homes between 2024 and 2029 in HDC's latest Authority Monitoring Report (April 2025)) and scored 65% in the latest Housing Delivery Test (below the minimum requirements set out in national policy). On this basis, the adopted housing policies within HDC's development plan are considered out-of-date and the presumption in favour of sustainable residential development is engaged (Paragraph 11 of the National Planning Policy Framework (2024)).
- 1.1.7 Paragraph 11 states:

"Plans and decisions should apply a presumption in favour of sustainable development.

...

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date [footnote 8], granting permission unless:

 - i. the application of policies in this Framework that protect areas or assets of particular importance [footnote 7] provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination [footnote 9]."*
- 1.1.8 The purpose of this Planning Statement is to demonstrate that the Proposed Development accords with the aims and objectives of national planning policy and the development plan, and is acceptable having regard to material planning considerations, when considered as a whole. As set out further within this Planning

Statement, the Proposed Development offers clear public benefits which outweigh any potential harm caused.

- 1.1.9 Whilst it is acknowledged that the Site is located within the Countryside as per HDC's adopted Horsham District Planning Framework (HDPF) (2015) (which this HPA is being determined under), the emerging evidence base supporting the emerging Horsham District Local Plan Regulation 19 version (dated January 2024) demonstrates that HDC considered the Site to be suitable to deliver a comprehensive new neighbourhood for up to 3,000 homes, representing a strategic opportunity to deliver sustainable residential-led mixed-use development, as illustrated in the proposed draft strategic site allocation Policy HA2. Details on the planning policy approach taken with this application is set out in Chapter 6.
- 1.1.10 The Proposed Development further seeks to deliver key enabling infrastructure to address identified unmet need for secondary school provision in Crawley and simultaneously deliver a mixed-use place that creates value and benefit to local communities.
- 1.1.11 As part of the preparation of this HPA, the vision and objectives for the Site has been shaped through extensive and ongoing engagement between the Applicant, HDC, Crawley Borough Council (CBC) (as the adjacent administrative authority) and WSCC. Extensive engagement has also been undertaken with the public, key stakeholders, infrastructure providers and delivery partners on the proposals to ensure that the potential impacts of the proposals are understood, appropriate mitigation is identified and a credible route to delivery is identified. Further details on the pre-application engagement are set out in Chapter 5, the Environmental Statement, prepared by Ramboll, and the Statement of Community Involvement, prepared by Pillory Barn.

1.2 Background to Homes England and the West of Ifield Scheme

- 1.2.1 The Applicant, Homes England, is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities & Local Government, and the government's Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change.
- 1.2.2 Homes England intention is to act as master developer to accelerate the delivery of key infrastructure, facilitate housing delivery in an efficient and effective manner, achieving significant social, economic and environmental benefits to the existing communities.
- 1.2.3 By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities.
- 1.2.4 As set out in Homes England's new Strategic Plan 2023-28, their mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home.
- 1.2.5 A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places to create distinctive places and spaces that are designed for people to use and thrive. Homes England also recognise that mixed-use regeneration to deliver housing alongside employment, retail and leisure space helps to create vibrant and successful places.
- 1.2.6 West of Ifield has a unique position to contribute to wider development needs and sub-regional growth priorities – in particular the continued economic growth of the Gatwick Diamond and housing needs across the wider Northern West Sussex Housing Market Area.
- 1.2.7 The majority of the Site was acquired initially in support of Crawley's New Town aspirations, with more recent acquisitions focused on housing delivery and delivering a sustainable extension to the Crawley conurbation. This demonstrates that the Proposed Development was always intended to be a new neighbourhood adjacent to Crawley.

1.2.8 The Site has been promoted for development by a consortium of landowners for a number of years prior to the Application and was previously considered as part of the previous Horsham District Planning Framework (HDPF) (2015) preparation where it was accepted that the Site is located in a relatively sustainable position and that there were no insurmountable issues to its delivery. However, the Site was not brought forward in the HDPF (2015) due to timings of delivery as a substantial part of the Site was previously owned by Ifield Golf and Country Club. HDC agreed that it would be appropriate to re-consider the Site in the next iteration of the local plan. Therefore, following the adoption of the HDPF (2015), Homes England has undertaken a significant programme of detailed design and technical work (including during the preparation of a subsequent Horsham District Local Plan 2023 – 2040) alongside land assembly so that issues identified are adequately addressed and to ensure there is now the necessary certainty needed to take forward the Proposed Development in a way that supports Homes England’s mission.

1.2.9 As set out above, the site-specific vision and objectives for the Site have been shaped through extensive and ongoing engagement. This collaborative approach has ensured that there has been a collective understanding of the opportunities and constraints across the site and the wider area and how the site can best meet development needs and mitigate any impacts, as well as ensure consistency across available evidence.

1.2.10 Some examples of how this collaborative approach has positively influenced sustainable outcomes for both the Site and for realising benefits for the wider area include adopting a ‘decide and provide’ approach to the overarching transport strategy (see Chapter 7.8 and the Transport Assessment) which will achieve a greater modal shift towards more active and sustainable travel modes; the landscape-led approach to masterplan design (see Chapter 7.5, the Design and Access Statement and Site Wide Design Code); preparation of an overarching economic strategy that aligns with local economic objectives (see Chapter 7.4 and the Employment and Economic Development Strategy); pro-active engagement with infrastructure providers, and requirement for the Site to fully integrate with the neighbouring Crawley neighbourhoods.

1.2.11 Whilst the Site is not allocated for development, it was proposed as a draft strategic site allocation under Policy HA2 of the Horsham Local Plan 2023 – 2040, which has been recommended by the Inspector to be withdrawn. Extensive work has been undertaken by both Homes England and HDC to demonstrate that it is a suitable site to deliver a sustainable neighbourhood. Given the acute need for housing within HDC, the Application is submitted ahead of a draft site allocation to deliver much needed housing, affordable housing and family housing for HDC.

1.3 Summary of the Proposals

1.3.1 This HPA takes a hybrid format, seeking consent in outline for the overall site with detailed consent to enable early delivery of necessary infrastructure for the Secondary School (where there is an immediate need), including the delivery of the first phase of the Crawley Western Multi-Modal Corridor (CWMMC).

1.3.2 Given the large-scale nature of the HPA, it is envisaged that it will be delivered over a number of years (up to 2041). The Application and subsequent planning permission will be required to be flexible and allow for futureproofing through subsequent applications as far as is appropriate.

1.3.3 The Description of Development set out in Chapter 4 but in summary, the Proposed Development will include the following aspects:

- Up to 3,000 new homes (Class C2 and C3) comprising a mix of housing types and sizes (including all affordable homes as M4(2) compliant and 2.5% custom/self-build plots), which are anticipated to be delivered by 2041;
- 35% affordable housing to a blended housing mix to help meet Horsham and Crawley’s housing need;
- Up to 15 Gypsy and Traveller pitches;

- A significant employment area (across Class E, Class B2 and B8), which will generate long-term economic benefits;
- A new Neighbourhood Centre, with community space, indoor leisure, retail (including a new foodstore), creche, health facilities and an 80-bed hotel;
- A 3 form-entry (FE) Primary School, with an Early Years Nursery and student support centre, and a 6-8FE Secondary School, including Sixth Form;
- Delivery of the necessary infrastructure required for the Secondary School within the first phase of the Proposed Development to meet immediate need;
- A landscape-led development, including the retention, protection and enhancement of highly valued landscape and ecological features, supporting local nature recovery objectives;
- Formal and informal open space and recreation provision, including three neighbourhood parks, amenity open space, play provision, and allotments and grow spaces;
- Wide range of sports and recreation facilities to meet the demand generated from the Proposed Development as well as to address wider needs / deficiencies in the local area in excess of this;
- A minimum of 10% biodiversity net gain;
- Comprehensive sustainable transport strategy, including integrated transport network to mitigate the proposals own impact;
- Delivery of Phase 1 of the CWMMC, with a segregated bus lane, and investment in other sustainable and active travel opportunities;
- Prioritisation of walking and cycling, fostering active lifestyles and supporting the creation of '15-minute neighbourhoods'; and
- Comprehensive surface water drainage, including Sustainable Urban Drainage Systems (SuDS).

1.4 Structure of the Document

1.4.1 This Planning Statement is structured as follows:

- 1) **Introduction and Purpose of the Document** – This chapter sets out the purpose of the Planning Statement.
- 2) **Structure of the Application** – This chapter provides an overview and purpose of the documents submitted as part of the HPA.
- 3) **The Application Site Context and Surroundings** – This chapter provides a description of the Site and its context.
- 4) **Proposed Development** – This chapter outlines out the Description of Development for which planning permission is sought.
- 5) **Consultation and Engagement** – This chapter provides a summary of the consultation and engagement which has been carried out in advance of the submission of the HPA.
- 6) **Planning Policy Context** – This chapter identifies the relevant national and local policy context for the Proposed Development.
- 7) **Planning Assessment** – This chapter outlines how the Proposed Development responds on a thematic basis to the planning policy context outlined in Chapter 6.

- 8) **Summary and Conclusions** – This chapter provides a summary, demonstrating that the Proposed Development should be approved.

2. Structure of the Application

2.1 Introduction

- 2.1.1 Due to the scale and nature of the Proposed Development, the Applicant has voluntarily agreed to undertake an Environmental Impact Assessment (EIA).
- 2.1.2 EIA is a process that is required to be followed for certain public and private development projects to ensure that the decision-maker, when deciding whether to grant planning permission, does so with full knowledge of the project's likely significant effects and takes this into account in the decision-making process. The EIA process also sets out consultation, publication and notification requirements to ensure that members of the public and statutory consultees are given appropriate opportunities to participate in decision making procedures.
- 2.1.3 A request for a Scoping Opinion (supported by a Scoping Report) was submitted to HDC on 21 May 2024 which amended the previous Scoping Opinion made under EIA/23/0007. The Scoping Report can be viewed via HDCs planning portal under reference EIA/24/0003.
- 2.1.4 As a result, an Environmental Statement has been prepared to fulfil the requirements of the Scoping Opinion, in compliance with Regulation 18(4)(a) of the Environmental Impact Regulations and is submitted under this HPA.
- 2.1.5 Further details of the EIA process are set out in the accompanying Environment Statement, prepared by Ramboll.
- 2.1.6 The HPA comprises a number of documents which have been scoped with HDC during pre-application, meet all national requirements for 'Major' development and have regard to the local validation lists for Horsham¹ and West Sussex² (although the application is not submitted to WSCC for determination).
- 2.1.7 Please note, significant engagement has also been undertaken with CBC during the preparation of this HPA, however, the application is not submitted to CBC for determination as the Site boundary is located solely within HDC. Further details on engagement are set out in Chapter 5 of this Planning Statement and the accompanying Environmental Statement.
- 2.1.8 This results in a series of plans and documents which can be summarised as follows and are detailed below:
 - **Application forms, Certificates and drawings for approval for the HPA** – provide statutory planning application forms being submitted to the LPA and also provides the list of drawings for approval which cover both the detailed and outline element of the planning application.
 - **Full (Phase 1) planning application drawings for approval** – provide full details for the early stage infrastructure relevant only to the detailed element of the proposal.
 - **Full (Phase 1) planning application documents for information** – provide supporting information and detail on the detail element of the Proposed Development, however these matters are also covered in documents prepared for the outline element of the Proposed Development.
 - **Outline planning application (OPA) Development Parameters** – provide the description of development and parameters for which approval is sought. Future Reserved Matters Applications (RMAs) would be required to demonstrate compliance with these parameters.

¹ Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0004/79159/Local-Validation-List.pdf (Accessed 17/07/2025)

² Available at: <http://www2.westsussex.gov.uk/forms/BCD47locallist.pdf> (Accessed 17/07/2025)

- **Documents for information and illustration** - provide supporting information and detail on the way in which the application has been developed, plans and frameworks to guide implementation, as well as illustrative material that demonstrates one way in which development could be brought forward within the outline area.
- **Technical assessments and strategies** - provide details in regard to technical assessment and strategies that have informed the impact assessments, proposed mitigation and proposed infrastructure.

2.2 Application Forms, Certificates and Drawings for Approval for the HPA

2.2.1 The HPA is submitted with a series of statutory application forms, schedules and notices providing information about the proposals and details of landownership notices.

Application forms and Certificates

2.2.2 The application form outlines the Proposed Development, and the Certificates confirm the land ownership or agricultural holdings in respect of the Site.

Community Infrastructure Levy (CIL) Form (WOI-HPA-DOC-CIL-01)

2.2.3 The CIL form outlines the estimated CIL contributions using outline land use parameters and is expected to be refined at the RMA stage.

Site Location Plan (WOI-HPA-PLAN-LOC-01)

2.2.4 This plan shows where the Site sits in relation to its surroundings.

Planning Application Boundary (Red Line) Plan (WOI-HPA-PLAN-PAB-01)

2.2.5 This plan shows the extent of the West of Ifield HPA boundary (the red line), including elements applied for in detail and those in outline. This drawing will also reflect the extent of land within the control of the Applicant close or adjacent to the Site (the blue line).

Building Demolition/ Retention Plan (WOI-HPA-PLAN-DEM-01)

2.2.6 This plan identifies the existing buildings to be demolished or retained as part of the Proposed Development.

Landscape Retention Plan (WOI-HPA-PLAN-LRP-01)

2.2.7 This plan identifies the existing landscape features to be retained as part of the Proposed Development.

Public Right of Way Amendment Plan (WOI-HPA-PLAN-PROW-01)

2.2.8 This plan identifies Public Rights of Way (PRoW) that are to be amended as part of the Proposed Development. This is subject to a subsequent modification process which will capture the proposed PRoW diversion.

2.3 Detailed Planning Application Drawings for Approval

2.3.1 A set of planning drawings have been prepared by Arcadis to provide details of the detailed element of the Proposed Development for which full planning permission is sought. A Drawing Register for the detailed drawings is enclosed at **Appendix A**.

2.4 Detailed Planning Application Documents for Information

2.4.1 The following documents have been submitted for the detailed element of the Proposed Development:

- Phase 1 Landscape & Ecological Management Plan (ref. 10051123-ARC-300-1A-TR-LA-00001)
- Phase 1 Outline Construction Environmental Management Plan (ref. 10051123-ARC-XXX-ZZ-TR-CM-00001)

- Phase 1 Construction Traffic Management Plan (ref. 10051123-ARC-XXX-ZZ-TR-TP-0001)
- Phase 1 Ecological Mitigation Strategy (ref. 10051123-ARC-XXX-ZZ-TR-EC-00004)
- Phase 1 Surface Water SUDS & Foul Drainage Design Report (ref. 10051123-ARC-050-ZZ-TR-CE-00002)
- Phase 1 Utilities Report (ref. 10051123-ARC-051-ZZ-TR-ZZ-00001)
- Phase 1 Earthworks Strategy (ref. 10051123-ARC-060-ZZ-TR-CE-00001)
- Phase 1 Flood Risk Assessment Addendum with Hydraulic Modelling Report (ref. 10051123-ARC-260-ZZ-TR-ZZ-002)
- Phase 1 Biodiversity Net Gain Assessment (ref. 10051123-ARC-XXX-ZZ-TR-EC-00002)

2.5 Outline Planning Application Development Parameters and Drawings for Approval

2.5.1 A set of documents, drawings and Parameter Plans provide details of the Proposed Development for which outline planning permission is sought. The planning permission will include conditions requiring RMAs to be in accordance with the OPA Parameters and comprise the following key documents.

Site Wide Design Code (WOI-HPA-DOC-SWDC-01)

2.5.2 The Site Wide Design Code provides key controls, requirements and guidance to inform detailed design proposals at the RMAs. The Design Code is key to securing high quality development and shaping the way in which the Site evolves over time. The Site Wide Design Code builds on the design principles in the Design and Access Statement (DAS) and will be conditioned to ensure RMAs are brought forward in conformity with the Site Wide Design Code. Detailed Design Codes for a neighbourhood or phase are anticipated to be brought forward as part of the RMAs (where applicable) and are approved prior to the RMAs being granted. The requirement for Detailed Design Codes is expected to exclude particular elements, such as enabling infrastructure works and individual elements such as pavilions or key community buildings.

Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01)

2.5.3 The principal purpose of the Development Specification and Parameter Plan Framework (DSPPF) is to provide clarity to the LPAs and other stakeholders on what elements of the proposals are to be "fixed" as part of the outline element of the HPA. The DSPPF sets out the description of development, parameters and development floorspace schedule for which outline planning permission is sought. The EIA process, reported in the Environmental Statement (see below) accompanying the HPA, has assessed the Proposed Development within these defined parameters and identified the likely significant effects of the Proposed Development on the environment.

2.5.4 The Parameter Plans submitted with the OPA identify elements of the scheme which are fixed in order to ensure environmental impacts are properly assessed, in accordance with established practice and case law. Some of the parameters are defined within identified limits of deviation in order to provide flexibility as the scheme is to be developed. The Parameter Plans are as follows:

- **Landscape and Public Realm Parameter Plan (WOI-HPA-PLAN-PP01-01)**

This parameter plan identifies the areas for strategic green infrastructure alongside the location of the neighbourhood centre public square.

- **Movement and Access Parameter Plan (WOI-HPA-PLAN-PP02-01)**

This parameter plan identifies the proposed location of the principal pedestrian/cycle routes and highways connections, including those which are applied for in detail for context and those to be covered through RMAs.

- **Land Use Parameter Plan (WOI-HPA-PLAN-PP03-01)**

This parameter plan identifies the distribution of uses across the Site.

- **Building Heights Parameter Plan (WOI-HPA-PLAN-PP04-01)**

This parameter plan identifies the maximum building heights permitted across the Development.

2.6 Planning Application Drawings for Information and Illustrative Purposes

2.6.1 The HPA is accompanied by a series of plans submitted to support the HPA. These are set out below.

Existing Levels Plan (WOI-HPA-PLAN-LEV-01)

2.6.2 This plan outlines the existing topographical features of the Site.

Illustrative Masterplan (WOI-HPA-PLAN-IM-01)

2.6.3 The Illustrative Masterplan provides an example of one approach that could be adopted to deliver the outline elements of the Proposed Development in accordance with the Parameter Plans, DSPPF and Site Wide Design Code.

2.7 Planning Application Supporting Documents and Technical Assessments

2.7.1 The HPA is accompanied by a number of supporting documents and technical assessments.

Planning Statement, including Affordable Housing Statement (WOI-HPA-DOC-PS-01)

2.7.2 This Planning Statement outlines how the HPA has responded to national and local planning policy, details of the Proposed Development (such as the affordable housing proposals) and why planning permission should be granted.

Design and Access Statement (WOI-HPA-DOC-DAS-01)

2.7.3 The DAS establishes a series of design principles across the Application Site setting out the vision for the Proposed Development, demonstrating its design evolution as well as providing details of access, scale, character, use and landscape. Illustrative examples of how these principles could be implemented are included within the DAS; however, it should be noted that these are for illustrative purposes only and are not for approval. The DAS has informed the preparation of the Design Code, which is submitted for approval. In addition, this document appraises the development against the Building for a Healthy Life principles.

Draft Heads of Terms for a Section 106 agreement (WOI-HPA-DOC-HOT-01)

2.7.4 The Section 106 Heads of Terms are provided alongside the HPA to explain the package of obligations that could be secured by way of a Section 106 Agreement. The draft Heads of Terms include the proposed obligations that the Applicant is willing to be bound by, in order to meet the needs generated by the Proposed Development. The mitigation package offered within this HPA has been subject to detailed pre-application engagement between the Applicant, HDC and WSCC.

Statement of Community Involvement (WOI-HPA-DOC-SCI-01)

2.7.5 Describes the pre-application engagement process including summaries of the feedback received, highlights amendments made to the Proposed Development as a result of feedback, and information on events held with the public and key stakeholders.

Health Impact Assessment (WOI-HPA-DOC-HIA-01)

2.7.6 This Assessment demonstrates how the Proposed Development has been planned and designed with health and wellbeing objectives in mind and how this has informed the design development of the proposals.

Transport Assessment (WOI-HPA-DOC-TA-01)

2.7.7 This Assessment sets out transport impacts relating to the Proposed Development. It identifies the measures to deal with the anticipated transport impacts of the scheme and to improve accessibility and

safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

Framework Travel Plan (WOI-HPA-DOC-FTP-01)

2.7.8 The Framework Travel Plan is submitted that identifies the specific required outcomes, targets and measures, and sets out clear future monitoring and management arrangements all of which are proportionate to the Proposed Development. The Framework Travel Plan sets explicit outcomes, rather than just identify the processes to be followed, such as encouraging active travel or supporting the use of low emission vehicles. It addresses all journeys resulting from the Proposed Development by anyone who may need to visit or stay and accords with wider strategies for transport in the area. It will guide future Travel Plans submitted as part of RMAs and it is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Flood Risk Assessment (WOI-HPA-DOC-FRA-01)

2.7.9 The Assessment reviews the risk of flooding, particularly in relation to the residential and commercial aspects of the Proposed Development. The methodology and scoping for the Flood Risk Assessment (FRA) has been agreed with the LPA and documents how the proposals are safe and do not increase flood risk locally.

Surface Water Drainage Statement (WOI-HPA-DOC-SWDS-01)

2.7.10 This Statement sets out how surface water will be managed through sustainable drainage systems. It is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Water Neutrality Statement (WOI-HPA-DOC-WNS-01)

2.7.11 This Statement outlines the estimated water consumption rates for the Proposed Development along with demand reduction measures and solutions proposed which would make the Proposed Development water-neutral. It is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA, with detailed strategies to be provided at the RMA stage.

Sustainability Statement (WOI-HPA-DOC-SUS-01):

2.7.12 This Statement describes the approach that has been taken to sustainability during the design process and considers the extent to which development proposals accord with the principles of sustainable development.

Retail Impact Assessment (WOI-HPA-DOC-RIA-01)

2.7.13 This Assessment outlines that the retail offer will not impact surrounding centres and is proportional to the development proposals. It is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Energy Statement (WOI-HPA-DOC-ENE-01)

2.7.14 This Statement outlines the project commitments regarding energy, including fabric energy efficiency standards, the incorporation of renewable and low carbon technologies, as well as opportunities to increase energy efficiency through site layout, building design and energy supply. It is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Utilities Statement (WOI-HPA-DOC-UTI-01)

2.7.15 This Statement outlines and assesses the existing utility networks in relation to the Site and identifies necessary utility infrastructure upgrade / reinforcement works and potential points of connections.

Arboricultural Impact Assessment (WOI-HPA-DOC-AIA-01)

2.7.16 This Assessment includes a Tree Survey, which records all relevant information about trees on or adjacent to the Site and assesses the impact that the Proposed Development has on the trees, hedgerows and other arboricultural features and how this will be mitigated via an Arboricultural Impact Plan. It is expected that

this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Phase 1 Ground Conditions Assessment (WOI-HPA-DOC-GCA1-01)

2.7.17 This Assessment details the existing Site's ground conditions and environmental setting and identifies how this may influence development. This document relates to the area within the Site boundary and will inform any future investigations required at subsequent stages.

Outline Construction Environmental Management Plan (WOI-HPA-DOC-OCEMP-01)

2.7.18 This document sets out principles for how the construction stage will be managed to reduce impact on local receptors. It is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Minerals Resource Assessment (WOI-HPA-DOC-MRA-01)

2.7.19 This Assessment considers the potential to extract mineral resources as part of the construction stage.

Biodiversity Net Gain Report (WOI-HPA-DOC-BNG-01)

2.7.20 This Report outlines the project's commitment to a minimum of 10% increase in biodiversity and an outline strategy for achieving this. It is expected that this document will form the basis of a planning condition to be added on the grant of planning permission for the HPA.

Employment and Economic Development Strategy (WOI-HPA-DOC-EDS-01):

2.7.21 This Strategy outlines the estimated job creation as a result of the Proposed Development.

Golf Course Assessment (WOI-HPA-DOC-GOL-01)

2.7.22 This is an assessment submitted in line with paragraph 104 of the National Planning Policy Framework (2024).

Water Framework Directive Assessment (WOI-HPA-DOC-WFDA-01)

2.7.23 This Assessment outlines the three Water Framework Directive designated water bodies present on-site that have potential to be affected by the Proposed Development and assesses the impact and mitigation measures required.

Lighting Impact Assessment (WOI-HPA-DOC-LIA-01)

2.7.24 This Assessment sets out the potential lighting effects on sensitive receptors as a result of the proposed lighting of the Proposed Development.

Outline Operational Waste Management Strategy (WOI-HPA-DOC-OOWMS-01)

2.7.25 This outline strategy is to ensure that the waste generated during the completed development stage of the Proposed Development is effectively managed in line with the waste hierarchy and relevant policy requirements.

Outline Site Waste Management Plan (WOI-HPA-DOC-OSWMP-01)

2.7.26 This report has been prepared to identify high level waste objectives and set the direction for the detailed Site Waste Management Plan to be produced by the demolition and construction contractor for management of construction and demolition waste associated with the Proposed Development.

Habitats Regulation Assessment (WOI-HPA-DOC-HRA1-01 and WOI-HPA-DOC-HRA2-01)

2.7.27 This Stage 1 Habitats Regulation Assessment (HRA) assesses the implications of the proposals for the qualifying features of the European site or sites, in view of the site's conservation objectives and identifies way to avoid or minimise any effects. A Shadow HRA also accompanies the HPA.

Non-Technical Summary (WOI-HPA-DOC-ESNTS-01):

2.7.28 This document is a summary of the full Environmental Statement, addressing the likely significant positive or negative effects that the Proposed Development may have on the environment, together consisting of the natural, social and economic aspects.

Environmental Statement (WOI-HPA-DOC-ESV1-01)

2.7.29 The Environmental Statement contains a number of chapters which assess the environmental impact of the Proposed Development and its likely significant beneficial and adverse effects. The Environmental Statement, scoped with HDC as part of pre-submission engagement, identifies and explains the likely impact, alongside the mitigation incorporated into the proposals for the following areas:

- Chapter 6: Agriculture and Soils
- Chapter 7: Air Quality
- Chapter 8: Biodiversity
- Chapter 9: Climate Change
- Chapter 10: Cultural Heritage
- Chapter 11: Landscape and Visual Impact
- Chapter 12: Noise and Vibration:
- Chapter 13: Socio Economic and Health
- Chapter 14: Water Environment and Flood Risk
- Chapter 15: Traffic and Transport

Volume 2: Appendices (WOI-HPA-DOC-ESV2-01):

2.7.30 This document includes the relevant appendices relied upon as part of Volume 1.

3. The Application Site Context and Surroundings

2.1 Introduction

3.1.1 The redline boundary plan shown at **Appendix B** is provided to clearly mark the limits of the planning application, separating out the areas applied for in detail and those applied for in outline. A description of wider context and location, the boundary and site characteristics are described as follows.

3.2 Site Location and Context

3.2.1 The Site falls within the administrative area of HDC.

3.2.2 The Site is located south of Charlwood Road, beyond which lies Gatwick Airport.

3.2.3 The surrounding area is occupied by agricultural land uses, light industrial, commercial and residential land uses. The M23 motorway, which connects London with the south of England, is located approximately 3.7km to the south-east. Land to the west and south-west is predominantly in agricultural use with small holdings and villages present further west, for example, the villages of Lambs Green and Rusper. Land uses to the north are also predominantly agricultural/rural, with the key exception being Gatwick airport, which is located approximately 1km to the north-east, beyond which lies the town of Horley. Land adjacent to the north-west of the site boundary is occupied by ancient woodland and few farmlands beyond. An extensive network of public footpaths provides for pedestrian access and recreation across the rural area, both within and the outside the Site, and this includes good connections with the urban area.

3.3 Application Site Boundary

3.3.1 The northern boundary of the Site abuts Charlwood Road, Ifield Avenue, Bonnets Lane, and Ifield Green. Ifield Wood and Cophall Wood are directly adjacent to the Site's north-west. The River Mole and woodland along the river run along the Site's north-eastern boundary before joining the Site along the eastern boundary. The Site is also bounded by various land uses to the north, north-east, and north-west, including Stanford House, Standford Bridge, the Da Vinci Gatwick hotel, Sri Guru Singh Sabha Ifield Green, and residential houses.

3.3.2 The Site's eastern boundary abuts Ifield Village (although entirely within HDC), which is the historic core of Ifield and is centred around the Church of St. Margaret and a public house.

3.3.3 Outside the red line boundary, to the east of the Site, is Ifield Meadow, which adjoins a wooded area and extends into an area of ancient woodland. Ifield Brook Wood and Meadows is designated as a Local Wildlife Site (LWS) and a Site of Nature Conservation Importance (SNCI). Within the LWS and SNCI lies Ifield Mill Stream and Ifield Brook that flow from south to north across the eastern part of the site and to which a number of smaller tributaries and drainage channels are connected. Small woodland blocks are located alongside sections of the River Mole and Ifield Brook. The eastern boundary runs along the Ifield Brook until it feeds into the River Mole in the north and reaches 'The Maples' residential estate in the south.

3.3.4 Beyond the Ifield Brook is the Ifield Conservation Area and Rusper Road Playing Fields. The area adjacent to the eastern boundary and beyond is mostly residential in land-use, with the closest buildings located along Rusper Road. The Parish Church of St. Margaret, a listed building, is located approximately 180m to the east of the Site.

3.3.5 The Site's southern boundary adjoins the rear boundaries of residential properties that front onto Rusper Road. These properties have a mix of boundary treatments, ranging from relatively open low picket fences

to more substantial fencing with tree and hedge screening. Rusper Road bisects the Site for a short section near the golf course, where the Site is bounded by Peverel Road and Hyde Hill Brook along the south-eastern boundary, beyond which is Ifield West with residential land-use. The south-western edge of the boundary beyond Hyde Hill Brook is predominantly occupied by ancient and semi-natural woodland.

3.3.6 The Site's western boundary is characterised by woodland, understorey vegetation, and agricultural land. It is adjacent to farmland, associated farm buildings, and isolated residential properties. Beyond this, the surrounding land includes scattered farmhouses and individual houses, including an intermittent array of houses along Ifield Wood, a rural lane located approximately 200m to the north-west at the nearest point.

3.4 Application Site Description

3.4.1 The Site is located outside of a defined settlement boundary.

3.4.2 The Site is predominantly occupied by a mixture of arable and pastoral fields and includes the Ifield Golf Course and Country Club (hereafter referred to as the 'golf course') in the south. Part of the site includes a former garden nursery with significant hard standing. There are small number of existing buildings located within the Site, including four dwellings, which are identified for demolition.

3.4.3 Current access to the site is via Charlwood Road in the north and Rusper Road to the south.

3.4.4 The vast majority of the Site is within category of Flood Zone 1 (< 0.1% annual chance of flooding), with areas of Flood Zone 2 (0.1% annual chance of flooding) and Flood Zone 3 (1% annual chance of flooding) associated with the Ifield Brook, which runs in a northerly direction within the east side of the Site, and the River Mole, which runs through the northern portion of the Site, running in a south-west to north-east direction.

3.4.5 The Site topography is generally low-lying, with ridges to the south and west. The first of these ridges passes through the southern part of the Site in an approximate east-west alignment and this rises up from 76m above ordnance datum (AOD) in the south-west to approximately 85m AOD at Hyde Hill. The second ridge is located approximately 1km to the north-west at Russ Hill. It is orientated in an approximate south-west to north-east alignment which rises up from 68m AOD on Site and extends up to 100m AOD at Russ Hill. The low-lying land between these two ridges lies at approximately 60-70m AOD and is dissected by the narrow watercourses of Ifield Brook and the River Mole.

3.4.6 Whilst there are no statutory ecological or landscape designations on the Site, it has biodiversity value due to the presence of notable habitats, including trees, tree groups, semi-natural grassland areas and hedgerow, as well as the potential to support protected and notable species.

3.4.7 There is a discrete off-site parcel of land that is situated within the northern portion of the Site. This northern 'island' comprises the Ifield Court Hotel (covering an area of approximately 1ha), a medieval moat at Ifield Court, classified as a scheduled monument and some agricultural buildings.

3.4.8 There are no statutory listed buildings within the Site, however there are a number of listed buildings located outside of the site along Rectory Lane to the east of the Site, the Old Pound Cottage along Rusper Road, and Ifield Court to the north of the Site is a Scheduled Monument.

3.4.9 There are a number of residential properties and agricultural buildings (some within the Applicant's ownership) and a hotel at Ifield Court, these, however, are outside of the red line boundary.

3.4.10 There are no Tree Preservation Orders (TPOs) on the Site.

3.5 Relevant Planning History

3.5.1 It is considered that there are no directly relevant planning applications submitted within the application boundary or adjacent to it such that it would influence the determination of the HPA.

3.5.2 A list of cumulative schemes has been identified as part of the EIA and are detailed within the submitted Environmental Statement.

3.6 Relationship to Nearby Strategic Schemes

Gatwick Airport

3.6.1 Land around Gatwick Airport is currently safeguarded to allow for the future expansion of the airport if necessary. Most of this safeguarded area is located within the administrative boundary of Crawley Borough, but a small area in the far north east of the HDC administrative area and to the north of the Site.

3.6.2 Aerodrome safeguarding is also a legal requirement set out by the International Civil Aviation Organisation (ICAO). Legal requirements are embedded into the Town & Country Planning process through the DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes, Technical Sites & Military Explosives Storage Areas: The Town & Country Planning (Safeguarded Aerodromes, Technical Sites & Military Explosive Storage Areas) Direction 2002. It seeks to ensure the continued safe operation of airport related activity when new development proposals close to aerodromes come forward.

3.6.3 In July 2023, London Gatwick Airport³ submitted a Development Consent Order (DCO) to the Planning Inspectorate (PINS) for their Northern Runway Project (NRP). Due to the scope of proposals, the application is being advanced under a DCO as it is classified as a Nationally Significant Infrastructure Project. Proposals are focused to bring the existing northern runway into routine operation, rather than for emergency and maintenance use only. This runway is parallel to the main runway and is currently restricted under a planning condition for use as a standby/emergency runway. Routine use of the northern runway alongside the existing main runway would provide a dual runway operation at Gatwick Airport.

3.6.4 No new flight paths would be created as a result of the NRP. The NRP includes the development of a range of infrastructure and facilities, largely within the confines of the existing airport boundary, as well as major road enhancements to improve access to the airport. Collectively, the NRP proposals include:

- Alterations to the existing northern runway, including repositioning its centreline 12 metres further north to enable dual runway operations;
- Reconfiguration of taxiways;
- Pier and stand amendments (including a proposed new pier);
- Reconfiguration of other airfield facilities;
- Extensions to the North and South Terminals;
- Provision of additional hotels and office space;
- Provision of reconfigured car parking, including new surface and multi-storey car parks;
- Surface access (highway) improvements;
- Reconfiguration of existing utilities, including surface water, foul drainage and power; and
- Landscape / ecological planting and environmental mitigation.

3.6.5 The project also includes new commitments to a noise envelope, a Carbon Action Plan, a sustainable transport strategy and biodiversity enhancements.

3.6.6 The application was accepted for detailed examination by the Planning Inspectorate, which concluded on 27 August 2024. The Inspector issued a minded to approve letter in February 2025. The statutory decision

³ Available at: <https://www.gatwickairport.com/business-community/future-plans/northern-runway/> (accessed 17/07/2025)

deadline for a decision on the application has been extended to 27 October 2025 to allow time to gather further information on several matters.

4. Proposed Development

4.1 Description of Development

4.1.1 This HPA includes an element applied for in detail and an element applied for in outline with all matters reserved. It is anticipated that the outline planning element would include conditions requiring RMAs to be submitted in accordance with the DSPPF, Parameter Plans, and the Site Wide Design Code which are submitted within this HPA for approval.

4.1.2 The Description of Development for the Proposed Development is as follows:

Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising:

A full element covering enabling infrastructure including the Crawley Western Multi-modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside

An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage and distribution (Class B8), hotel (Class C1) community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (Sui Generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition.

This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.

4.2 Full (Detailed) Element

4.2.1 The full element comprises Phase 1 of the Proposed Development and will include the infrastructure required for the delivery of the secondary school, including the first phase of the CWMMC. The outline Parameter Plans, submitted with this HPA, safeguard land for the future expansion of the CWMMC towards the A264, should this be progressed.

4.2.2 The CWMMC is a new road with a dedicated bus lane and regular traffic lane in each direction, to form a connection from Charlwood Road to the east and the primary access route to the Proposed Development. This will be a critical transportation artery and extends for approximately 2.5km. The CWMMC is designed to accommodate various modes of transportation, including vehicular traffic, buses, cyclists and pedestrians, reflecting a commitment to multi-modal solutions.

4.2.3 In addition, a primary street is proposed which will form a spine road, incorporating primary and secondary street connections, together with parking and loading bays, street lighting and fixtures. Active travel provision will also be incorporated including dedicated cycle ways and footways within the primary street.

4.2.4 The public transport element will comprise Mobility Hubs and provision for bus transport, with bus stops, car club bays and bus priority through a bus-only connection to Rusper Road in the east.

4.2.5 Further details of Phase 1 are set out below and illustrated within Chapter 8 of the DAS:

- New bridge crossing of the River Mole;

- Site clearance and enabling works, including utilities diversions;
- Utilities, surface and foul drainage infrastructure to service the planned development plots in the outline element of the Proposed Development;
- Landscape works, incorporating sustainable urban drainage corridors, flood mitigation features, ecological mitigation and enhancement, noise mitigation (including noise bund) and soft landscaping; and
- Local amendments to existing PRoWs (although subject to a separate application).

4.3 Outline Element

4.3.1 Whilst early enabling infrastructure is the only matter for which detailed approval is sought at this stage, given the nature of the Site and its ambitions, the outline proposals are supported by an appropriate level of design work and careful thought has been given to ensuring that a suitable design can be achieved in the future for the Proposed Development.

4.3.2 The outline element seeks approved for a phased, mixed-use residential-led development laid out in four character areas:

- **Neighbourhood Centre:** This Character Area will play an important role in establishing the identity of the new community as a whole and represents the heart of the development. A mix of uses will be considered acceptable in this location including Class C1, C2, C3, F1, F2, E and *sui generis*.
- **Hillside and Woodlands:** This Character Area is situated to the south of the Neighbourhood Centre, and will comprise residential uses falling under Class C2, C3 and *sui generis*.
- **The Meadows:** This Character Area is defined by its centrepiece, Meadows Park, and will comprise residential uses falling under Class C2, C3 and *sui generis*.
- **River Valley:** This Character Area is the employment area, and will comprise uses falling under Class E, B2 and B8 uses. Part of this Character Area will be a flexible employment and residential zone where Classes C1, C2, C3, E and *sui generis* will be acceptable.

4.3.3 The Proposed Development seeks to deliver up to 3,000 homes comprising a range of flats and houses, of which 35% will be affordable. Allowance has also been made within the Proposed Development for the potential delivery of specialist accommodation to suit older persons, up to 15 Gypsy and Traveller pitches, and Custom and Self-Build housing.

4.3.4 The new community will be supported by a new Neighbourhood Centre and an employment, along with public open space and multi-functional green space, with sports and recreation provision.

4.3.5 The Neighbourhood Centre is proposed centrally within the built development and includes minimum commitments to a health centre, community centre, early year nursery and a local leisure facility, alongside smaller scale centre uses such as retail, and potentially a hotel. Community facilities are also proposed, including a Primary School and Secondary School (including Sixth Form).

4.3.6 In addition, employment uses are proposed, including flexible office and innovation space, across the Neighbourhood Centre and the River Valley character areas alongside general industrial and logistics space in the latter. Further details are set out below and in the DAS.

4.3.7 The DSPPF defines the type and quantum of development that can be brought forward at RMAs stage, whilst the Site Wide Design Code provides mandatory and suggested design guidance to inform those RMAs. Together, the DSPPF and Site Wide Design Code are the two “control documents” that will regulate how the Proposed Development can be brought forward Based on the parameters set out in these control documents, an Illustrative Masterplan is also submitted with the HPA and explained within the DAS.

4.3.8 Details of the Parameter Plans are set out below.

Land Use

4.3.9 The Land Use Parameter Plan identifies the distribution of uses across the outline area and sets out the extent of the developable area within which built development will be delivered. Each of the land uses will be subject to the floorspace cap set out in the DSPPF, with the Land Use Table summarised below in Table 3.1 and detailed at **Appendix C**.

4.3.10 Maximum total floorspace are set out below for each non-residential use class as market demand and requirements for certain use classes are unknown at this stage.

Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace (GEA) to be enforced as part of S106 (where relevant)
Class E - Commercial, Business and Service	Up to 40,130sqm	E(a) Display or retail sale of goods, other than hot food	A maximum of 5,200sqm can be provided for Class E(a) uses
		E(b) Sale of food and drink for consumption (mostly) on the premises	
		E(c) Provision of: <ul style="list-style-type: none"> (i) Financial services, (ii) Professional services (other than health or medical services), or (iii) Other appropriate services in a commercial, business or service locality 	
		Class E(d)- indoor sport, recreation or fitness	A minimum of 3,400sqm provided as a Local Leisure Centre
		Class E(e) - Provision of medical or health services	A minimum of 1,500sqm to be provided for healthcare-related uses
		Class E(f) - Creche, day nursery or day centre	A minimum of 1,100sqm to be provided as a private early years facility
		E (g) Uses which can be carried out in a residential area without detriment to its amenity: <ul style="list-style-type: none"> (i) Offices to carry out any operational or administrative functions, (ii) Research and development of products or processes (iii) Industrial processes 	

Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace (GEA) to be enforced as part of S106 (where relevant)
Class B2- General industrial	Up to 5,200sqm	N/A	
Class B8- Storage or distribution	Up to 7,200sqm	N/A	
Class C1- Hotels	Up to 80 beds	N/A	
Class C2/C3 - Residential institutions / Dwellings houses	Up to 3,000 homes	N/A	
Sui Generis – Gypsy and Traveller pitches	Up to 15 pitches	N/A	
F1 – Learning and Non-residential institutions	Up to 11.75ha	3 form entry (FE) Primary School including 1 x Early Years Nursery and Student Support Centre.	A minimum site of 2.4ha to be provided
		6 FE expandable to 8 FE Secondary School including sixth form	A minimum site of 9.29ha to be provided
Class F2 - Local community	Up to 1,200sqm	Class F2(b)- Halls or meeting places for the principal use of the local community	A minimum of 600sqm to be provided for community uses

Table 3.1 Land Use Proposals

- 4.3.11 The Neighbourhood Centre will play an important role in establishing the identity of the new community as a whole, and will represent the heart of the development, serving as the core area that brings together various uses.
- 4.3.12 The area identified as the Mixed Use Neighbourhood Centre allows for the delivery of residential, commercial and community uses. These will have the flexibility to be located anywhere within the identified zone and minimum sizes of certain uses (for example, medical centre uses or community uses) are to be enforced through the Section 106 Agreement to ensure their delivery.
- 4.3.13 Given the more specific locational requirements associated with their provision, a specific area identified on the Land Use Parameter Plan for residential use (Class C2 and C3) is also considered to be an appropriate location for gypsy and traveller pitches, subject to the prevailing site requirements outlined within the Site Wide Design Code.
- 4.3.14 The precise alignment of built development could deviate from the land use boundaries once the final alignment of streets is fixed through the RMAs (in accordance with street sections design contained in the

Site Wide Design Code). Notwithstanding the flexibility allowed for in the Movement and Access Parameter Plan in relation to the alignment of the movement corridors, the retention of efficient residential and commercial development plots on either side of these movement corridors will be a main consideration at detailed design stage.

4.3.15 On-plot landscaping and infrastructure of non-strategic nature (e.g. secondary and tertiary streets and plot access) can be delivered within or outside the land use boundaries shown on the Land Use Parameter Plan, subject to other stipulations of the Landscape and Public Realm Parameter Plan and Movement and Access Parameter Plan.

4.3.16 It should be noted that the current preferred planning approach for the Secondary School is the submission of a RMA and therefore allowances for a Secondary School are included within this outline. Whilst typically detailed planning permission is often sought through the RMA process, given the extant need for the Secondary School to meet existing unmet need, it is possible that the detailed design of the Secondary School will be sought for approval through a drop-in planning application. This is to facilitate early delivery of the Secondary School to address capacity issues in existing schools. This has been thoroughly assessed and is considered in principle to be severable without impacting the ability to build out the remaining areas of the Proposed Development.

Landscape and Public Realm

4.3.17 The Landscape and Public Realm Parameter Plan identifies the minimum areas to be delivered for strategic green infrastructure across the outline area.

4.3.18 Within the Site, in areas of proposed landscape, the following purposes are acceptable (unless otherwise indicated): open land, formal and informal recreation, landscaping, surface water balancing and other water features, ancillary facilities for sports provision (including pavilion buildings) and for water abstraction (including treatment works), sustainable drainage systems, nature conservation, woodland, hedgerows, pedestrian and cycle routes within the green corridors, utility and maintenance corridors.

4.3.19 Areas of on-plot green infrastructure (i.e. not of Strategic Green Infrastructure) may also be delivered within the areas identified for development, subject to approval at RMA stage. It is also anticipated that green infrastructure corridors should continue across areas identified on the Movement and Access Parameter Plan.

4.3.20 The area identified on that parameter plan for the potential future expansion of the CWMMC is also included as an area of Green Infrastructure on this plan as it is expected to be appropriately greened in the interim and will be replaced by any future application which seeks to extend this corridor.

4.3.21 The Parameter Plan also illustrates the location of the school playing fields to influence the landscape-led nature of the proposals.

Strategic Green Infrastructure

4.3.22 These commitments identify minimum areas for Natural and Semi Natural Green Space and Parks and Gardens which must be delivered on the Site (across both the detailed and outline elements). This is summarised below and detailed within the DSPPF.

Typology *	Minimum (Ha) as part of the West of Ifield Green Infrastructure Strategy	Of which, is provided in the detailed element (ha)	Of which, is provided in the outline element (ha)
Natural and Semi Natural Green Space	72.5ha **	13.4ha	59.1ha
Parks and Gardens	26ha ***	0ha	26ha

* As shown on the Landscape and Public Realm Parameter Plan (ref. WOI-HPA-PLAN-PP01-01).

** This figure includes the approximately 11ha which has been identified on the parameter plan for nature conservation purposes and will not be publicly accessible. The total figure of natural and semi-natural green space also includes the specified ecological buffers and other assets which may (as identified at the RMA stage) have potential access restrictions for ecological benefit.

*** This figure includes 6.9ha in the proposed Secondary school boundary, as shown on the Parameter Plan.

Green Infrastructure to be secured at the RMA stage

4.3.23 In addition to the Strategic Green Infrastructure (specific for the outline area in the DSPPF as the remaining element of the overall Green Infrastructure Strategy), future RMAs will need to deliver other typologies of Additional Green Infrastructure as part of or in addition to the Strategic Green Infrastructure areas. These are identified on a per resident basis to ensure future provision meets identified needs. The method for estimating the number of residents associated with each RMA will be set out within the Section 106 and have been calculated in the submission IDP. Please note, these requirements can be delivered as part of other green infrastructure proposals (notably Parks and Gardens or Connective Green Infrastructure), where consistent with its function.

4.3.24 Broad locations are identified for these uses on the Parameter Plan although the precise form and design will be established through the RMAs at a later date, in accordance with the Parameter Plans and the Site Wide Design Code.

Typology	Minimum requirements (sqm) per resident *
Amenity Green Space	5.8sqm per resident
Allotment	1.8sqm per resident
Grass Pitches and/ or Artificial Pitches / Multi-Use Games Area (MUGAs)	Up to 7sqm per resident if using Grass pitches, or 1.5sqm if using artificial pitches/ MUGAs, although a combination of both is preferred.
Tennis & Multi Courts	0.75sqm per resident
LEAP/ LLAP/ NEAP	A total of 0.5sqm per resident across all provision.
Youth areas and Facilities	0.4sqm per resident

* Open space, play & sports provision has been calculated against the HDC Open Space, Sport & Recreation Review June 2021 Study, ensuring compliance with the latest standards.

Movement and Access Parameter Plan

4.3.25 The Movement and Access Parameter Plan shows how the vehicular accesses, public transport corridors and areas for pedestrian and cycle movements are structured within the Site.

Road and Street Network

4.3.26 The precise form and design of the road and street network will be established through the RMAs at a later date. The design of the streets is envisaged to be informed by technical requirements and subject to the design requirements outlined in the Site Wide Design Code. Further connections can be made in addition to the ones drawn where not in conflict with other controls within the Parameter Plans.

Stopping Up Order

4.3.27 To deliver the proposed Transport Strategy, a separate 'Stopping Up' Order will be sought. This will enable the downgrading of part of Rusper Road to serve as a public transport, pedestrian and cycle link only. This is set out in plain terms in the appendix to the Transport Assessment.

PRoW

4.3.28 Please also see separate Public Right of Way Amendment Plan which identifies the areas where existing PRoWs will need to be amended as part of the Proposed Development (either as a result of the full element or as part of the future RMAs). This will be subject to a separate modification process.

Building Heights

4.3.29 The Building Heights Parameter Plan establishes the maximum allowable building heights across the outline area. The maximum building heights have been informed by iterative testing completed and documented within the Landscape and Visual Impact Assessment, which is submitted alongside this HPA.

4.3.30 Heights shown are in metres Above Ordinance Datum (AOD) from existing site levels, plus an additional allowance of +/-300mm to allow for earth modelling during detailed design. As also identified on the drawing key, there is an additional allowance of +1,100mm should be allowed for above the maximum height level to accommodate lift overruns and roof top plant.

4.3.31 These defined building heights allow for architectural expression in respect of the vertical form of the proposed development plots, whilst ensuring that the height of buildings are appropriate to their surrounding context. The maximum heights should be read as a maximum envelope within which cuts and setbacks can be incorporated where appropriate in order to respond to the context and help ensure that the development is not uniform and has the flexibility to deliver varied rood heights and appearance.

4.3.32 Although not fixed as part of this Parameter Plan and further outlined in the Site Wide Design Code, the 10-14m limit is broadly equivalent to two storeys or three storeys, the 14-18m limit as three to four storeys and 18-20m to four or five storeys.

4.4 Delivery of the Proposed Development

4.4.1 This HPA is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.

4.4.2 Given that the proposals are for a large-scale development, it is anticipated that the Proposed Development will be delivered over a number of years and as such, requires flexibility and allowance for future-proofing for appropriate subsequent application to come forward in alternative formats which are similarly acceptable in planning terms.

4.4.3 Summarised below is an outline of indicative phasing across the Site as set out in the DAS as envisaged at the time of submission.

4.4.4 It is noted that the latter phases, however, could come forward in an alternative arrangement which would meet the vision and principles of the submission HPA. The submission documents, notably the Environmental Statement, consider which elements of the proposed development are severable and others which are not. In the case of the latter, this would likely need to be replicated in a subsequent application to ensure that the embedded mitigation of this HPA still applies. This process has been completed to ensure that this HPA, as the de facto parent permission, would not be subject to unnecessary risk resulting from any emerging Hillside issues and to demonstrate that explicit severability has been thoroughly considered from the outset.

Indicative Phasing

Phase 1	<p>This phase will deliver the necessary infrastructure required for the Proposed Development including:</p> <ul style="list-style-type: none"> • CWMMC • Primary Road • Rusper Road Bus Improvement (to be kept open to allow access to the school until CWMMC opens) • 6 FE expandable to 8 FE Secondary School • Substation • Water treatment works • Pumping station
Phase 2	<p>This phase will deliver the following:</p> <ul style="list-style-type: none"> • 1,249 new homes • Neighbourhood Centre activation uses, including 16,128sqm of commercial (Class E) floorspace • 634sqm of community floorspace • 80-bed hotel • Ridge Square • River Valley Park • Market Square • Enhance / update existing PRoWs within the Site • The Meadows Green Link • Green Amenity Spaces • Realignment of Rusper Road (in order to reduce potential rat running from the Site to Ifield and villages located to the northwest of the Site)
Phase 3	<p>This phase will deliver the following:</p> <ul style="list-style-type: none"> • 713 new homes • 8,558sqm of commercial (Class E) floorspace • 12,400sqm of employment (Class B2 and B8) floorspace • The Grove Sports Hub • Ridgeway Park • Green Amenity Spaces • The Meadows Green Link

	<ul style="list-style-type: none"> • Ifield Brook Meadows
Phase 4	<p>This phase will deliver the following:</p> <ul style="list-style-type: none"> • 764 new homes • 5,450sqm of commercial (Class E) floorspace • Green Amenity Spaces • The Meadows Park • Ifield Brook Meadows
Phase 5	<p>This phase will deliver the following:</p> <ul style="list-style-type: none"> • 274 new homes • The Meadows Park • Green Amenity Spaces • Ifield Brook Meadows • Sports Pitches

4.4.5 Subject to the approval and any conditions placed on the grant of permission for the HPA, construction is estimated to commence in 2027, with initial occupation of the Secondary School targeted in 2028, and then homes in 2029 and continuing until 2041.

5. Consultation and Engagement

5.1 Introduction

- 5.1.1 This Chapter provides a summary of the extensive consultation and engagement process that has informed the design process and has taken place at the pre-application stage and that has informed the Proposed Development.
- 5.1.2 As part of the preparation of the Application, and in addition to pre-application discussion, Homes England has undertaken extensive engagement on its proposals with the local community to seek their involvement and views on the emerging proposal, infrastructure providers and delivery partners and stakeholders to ensure that the potential impacts of the proposals are understood, appropriate mitigation identified and a credible route to delivery is identified.
- 5.1.3 A detailed summary of the consultation and engagement undertaken can be found in the submitted Statement of Community Involvement, although a summary of the consultation and engagement undertaken is detailed below.

5.2 Public Consultation

- 5.2.1 The HPA has been developed through a comprehensive engagement strategy which has followed key milestones as described below. The consultation strategy has been informed by guidance set out in HDC's Statement of Community Involvement.
- 5.2.2 Extensive public engagement activity has been essential to the development (particularly given its scale) and the preparation of the HPA, and feedback has been received from the public, Parish Council, local Councillors, local organisations and businesses and local residents.
- 5.2.3 A website has been created by Commonplace to support the engagement activities:
<https://westofifield.commonplace.is/>
- 5.2.4 Details of the engagement timeline are set out below.

Stage 1: 2019 to 2020 Engagement

- 5.2.5 The first round of engagement with the local community and key stakeholders took place in 2019 to 2020 and was the first step towards ongoing engagement with the public to introduce the vision for West of Ifield, understand the Site and establish key principles to inform the masterplan development.
- 5.2.6 Meetings were held with Colgate and Rusper Parish Council to understand initial thoughts of the proposals and outline the consultation events. Letters were also sent to all HDC and CBC Councillors and local residents inviting them to the first West of Ifield public engagement events in January 2020.
- 5.2.7 Due to COVID-19 pandemic, face to face engagement was to be avoided by Government advice and as such, alternative methods of engagement were undertaken by publishing online material and online meetings with stakeholders. All feedback was collected and a consultation summary report was prepared which is appended in the accompanying Statement of Community Involvement.
- 5.2.8 In April 2020, a 'Your Questions Answered' document was published to ensure transparency throughout the process and to demonstrate regard to feedback received.
- 5.2.9 A virtual public presentation was held in December 2020 and provided an opportunity for the community to hear more about the feedback received during the consultation events in January 2020, how this feedback informed the next stages of design, progress made to date and any future comments.

Stage 2: 2021 Engagement

5.2.10 The next round of engagement involved further meetings with Colgate Parish Council and Rusper Parish Council in April and July 2021, along with stakeholder engagement event where local councillors, businesses and residents were invited to online workshops (due to COVID-19 pandemic).

Stage 3: 2022 Engagement

5.2.11 The third round of consultation events to help inform the proposals took place in October and November 2022. The consultation comprised in-person engagement events and online webinars, explaining the Proposed Development and record feedback from the public, including those living on Rusper Road.

5.2.12 Key feedback from the third round of consultation events is summarised below:

- Several responses and attendees recognised the need for housing locally, the need for more affordable housing and the importance of different types of high-quality homes;
- There was general support for new development to provide supporting community and social infrastructure, and the concept of a '15-minute neighbourhood';
- There is a need for school places, health facilities and road infrastructure to support a large-scale development;
- Some agreed that there would be a need for the CWMMC, however, some questioned the timing and delivery of the infrastructure;
- Concern raised on the design of the neighbourhoods and the design code, with a strong desire for high-quality design;
- Support for a healthy environment;
- Concern raised that 10% biodiversity net gain will not be achieved;
- Many felt that the project should be environmentally responsible and queried what measures would be put in place to ensure long-term sustainability and initiatives for 'zero carbon' targets.
- Rusper Road residents raised concern about increased journey times and overall workability of the proposed layout;
- Support towards the move to more sustainable modes of transport; and
- Concern on flood risk.

Stage 4: Final Scheme Exhibition (Spring 2025)

5.2.13 A public exhibition event was held on 30th April 2025. This event demonstrated the changes made to the Proposed Development following comments received to date ('You Said, We Did') ahead of submission, including:

- An overview of the phase 1 detailed application, including the enabling works and delivery of the CWMMC;
- Reduced scale of development to south of golf course;
- Enhanced landscape buffers / protection measures on site boundaries;
- Additional flood modelling has been undertaken, liaising with the Environment Agency and the Lead Local Flood Authority;

- Progressed a Water Neutrality Strategy capable of making the proposals water neutral;
- Refined the social infrastructure phasing and commitments, notably regarding education and healthcare;
- Drafted a sports strategy to inform masterplan development;
- Reviewed on-site employment and non-residential uses proposed; and
- Validated on-site biodiversity net gain.

5.2.14 The above consultation can be viewed online⁴ has resulted in a layout that is underpinned by robust design principles, is responsive to the Site and its context, and is shaped by the comments and concerns raised by the local community and key stakeholders. The design evolution is outlined in Chapter 4 of the DAS whilst a detailed summary of the consultation and engagement undertaken can be found in the submitted Statement of Community Involvement.

5.3 Engagement with HDC, CBC and WSCC

5.3.1 A key element of engagement has been a series of pre-application meetings, allowing HDC, CBC (as the adjacent administrative authority) and WSCC to provide feedback on the development of the proposals and to verify technical information, methodologies and approaches submitted.

5.3.2 Further details on engagement with HDC, CBC and WSCC are set out in the accompanying Statement of Community Involvement and the Environmental Statement.

5.4 Other Consultees

5.4.1 A fuller list of statutory consultees and other organisations consulted on is contained within both the Statement of Community Involvement and the Environmental Statement. Since 2020, there has been ongoing liaison with key stakeholders, a summary of which is set out below:

- WSCC Highways – Agreed approach to modelling and review of draft Heads of Terms;
- Natural England – Agreed approach on extent of developable area to promote ecological function;
- Environment Agency – Liaison on proposed approach to baseline flood risk;
- Lead Local Flood Authority – Liaison on proposed approach on proposed drainage strategy;
- Thames Water – Liaison to understand constraints on foul water capacity and wider cumulative impacts (which has resulted in areas of the masterplan being safeguarded to enable future expansion of the sewer network), and understanding of phasing limitations linked with upgrades to Crawley Waste Water Treatment Works;
- Historic England – Agreed approach on cultural heritage assessment;
- Gatwick Airport – Early engagement to understand development limitations and liaison on noise contours;
- Sports England, England Golf and other national sporting associations – Liaison on the impact of closing the Ifield Golf Course and Country Club and appropriate mitigation to ensure any loss of this facility accords with national policy and provides betterment for golf, sports and recreation more widely within the locality;

⁴ <https://westofield.commonplace.is/> (accessed 17/07/2025)

- WSCC Education – Agreed approach on education provision (including signed Statement of Common Ground between Homes England, WSCC and HDC);
- WSCC Minerals and Waste – Agreed approach to Minerals Resource Assessment
- Department of Education – Liaison on the early delivery of a new secondary school on-site, approved under the free schools programme. Heads of Terms have been agreed and the required approvals in place to secure the land needed for the proposed Secondary School;
- Network Rail / Govia Thameslink – Liaison on station improvements at Ifield station;
- Metrobus – Early engagement to inform bus strategy planning and determine necessary levels of subsidy in support of overarching transport strategy;
- NHS Sussex Integrated Care Board – Liaison on future impacts on health provision and opportunities to accommodate new provision as part of the scheme to meet needs arising from the Proposed Development and the wider area as part of a wider accommodation strategy; and
- Gypsy and Traveller community – Liaison with Friends, Families and Travellers Group to understand community requirements and accommodation preferences.

5.5 Representations to Planning Policy

5.5.1 The Site has been promoted for development and was previously considered during the preparation of the now adopted HDPF (2015) where it was accepted that the Site is in a relatively sustainable location.

5.5.2 Whilst the Site was not taken forward as part of the adopted HDPF (2015), Homes England have continued to promote the Site for development and have engaged with HDC during the preparation of the Horsham District Local Plan 2023 - 2040. The emerging local plan sought to include a strategic site allocation (Policy HA2) for the Site, demonstrating that upon submission to Examination, HDC considered the site allocation to be 'sound'.

5.5.3 As part of the preparation of the new local plan, the Applicant has fully engaged with HDC's plan making process and has submitted representations at multiple stages of the emerging Local Plan, including Hearing Statements in November 2024.

5.5.4 However, the Examination of the Horsham District Local Plan has been cancelled, and at the point of submission, it is expected that the Horsham District Local Plan 2023 – 2040 will be withdrawn. Further details are set out in Chapter 6.

5.5.5 To note, the Applicant has also engaged with the plan-making process of the now adopted Crawley Borough Local Plan (2024), due to its location adjacent to the CBC administrative boundary.

6. Relevant Planning Policy Context

6.1 Introduction

- 6.1.1 This Chapter summarises the relevant planning policy context for the Proposed Development at national and local levels, and considers the statutory development plan policies, as well as other material considerations which are relevant to the HPA.
- 6.1.2 The policy context is set out under the following headings:
 - Statutory Development Plan Policy; and
 - Material Planning Considerations.
- 6.1.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires HDC and CBC to determine any application in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 6.1.4 This Chapter of the Planning Statement covers the planning policy context of the Proposed Development, such as key policy documents or material considerations, with **Appendix D** provided as a reference point that includes key policies for the determination of this HPA.

6.2 Statutory Development Plan Policy

- 6.2.1 The Site lies within the administrative area of HDC. Therefore, for this HPA, the statutory development plan comprises the following:
 - Horsham District Planning Framework (adopted in November 2015);
 - The Rusper Neighbourhood Plan (made in June 2021);
 - The West Sussex Joint Minerals Local Plan (adopted in July 2018) (Partial Review March 2021 and confirmed up to date in 2023); and
 - West Sussex Waste Local Plan (adopted in April 2014, and confirmed as up to date in 2024).
- 6.2.2 Details of the adopted development plan are set out below.

HDC Planning Framework (adopted in November 2015)

- 6.2.3 The statutory development plan for Horsham is the Horsham District Planning Framework (HDPF, 2015), which is the overarching planning document and sets out the spatial strategy for the District. This Plan remains statutory as the emerging Local Plan has not yet been adopted to formally supersede it.
- 6.2.4 Whilst the HDPF covers the plan period until 2031, it is nearly 10 years old, is overdue a review, and therefore, some of the local policies are not up-to-date nor in line with current national policy. In particular, this relates to Policy 15 'Housing Provision' which sets the housing target for the Plan period. As a result, of HDC being unable to demonstrate a five year housing land supply and a poor housing delivery rate against the Housing Delivery Test, the presumption in favour of sustainable residential development ('titled balance') is engaged. Therefore, whilst significant weight is applied to the HDPF (2015), no weight is applied to its housing supply policies.

The Rusper Neighbourhood Plan (made in June 2021)

- 6.2.5 The Neighbourhood Plan Area for Rusper covers the whole of the Parish of Rusper. On 23 June 2021, HDC resolved at Full Council that Rusper Parish Neighbourhood Plan to 2031, (incorporating the Examiners modifications and all modifications as per the HDC Decision Statement), should be 'made' and become part of the Development Plan for Horsham District Council for the Parish of Rusper. The purpose of the Rusper

Neighbourhood Plan is to set out a series of planning policies that will be used to determine planning applications in the area during the period to 2031, the same as the end of the plan period for the adopted HDC Planning Framework (2015) which was prepared in conformity with.

The West Sussex Joint Minerals Local Plan (adopted in July 2018) (Partial Review March 2021 and confirmed up to date in 2023)

6.2.6 WSCC worked in partnership with the South Downs National Park Authority to produce the West Sussex Joint Minerals Local Plan. It was formally adopted by both authorities in July 2018. Following a Soft Sand Review of the Plan, formal revisions were adopted in March 2021. The Minerals Local Plan was subject to a 5 year review in 2023 and the outcome of that assessment is that the plan remains relevant and effective; therefore, no formal review is required at this time (in whole or in part).

6.2.7 It sets out four key areas which will help shape the future of minerals activities in West Sussex including a vision and strategic objectives for sustainable minerals development, 10 policies to achieve the strategic objectives for minerals development in West Sussex (Policies M1-M10), 15 development management policies to ensure no unacceptable harm to the environment, economy or communities of West Sussex (policies 12-26) and four site allocations to help meet the need for soft sand and brick making clay (policy M11).

West Sussex Waste Local Plan (adopted in 2014, and confirmed up to date in 2024)

6.2.8 WSCC worked in partnership with the South Downs National Park Authority to produce the West Sussex Waste Local Plan. Formally adopted by both authorities in April 2014, the plan covers the period to 2031. The Waste Local Plan was subject to a 5-year review in 2019, as required by national policy. The outcome of the review undertaken in 2024 was that the plan remains relevant and effective; therefore no update is required at this time.

6.2.9 The plan sets out four key areas which will help shape the future of waste management waste in West Sussex including a vision and strategic objectives for sustainable waste management, nine policies to achieve the strategic objectives for the management of different waste types (Policies 1-9), 13 development management policies to ensure no unacceptable harm to the environment, economy or communities of West Sussex (Policies 11-23) and six site allocations to help us meet the need for new facilities (Policy 10).

6.3 Material Planning Considerations

6.3.1 When assessing the merits of this HPA, material planning considerations should be taken into account. These include (but are not limited to) the following:

- The National Planning Policy Framework (2024);
- The National Planning Practice Guidance (PPG) (as amended);
- HDC Facilitating Appropriate Development (October 2022); and
- Emerging evidence base from the Horsham District Local Plan 2023 – 2040.

National Planning Policy Framework (2024) and the National Planning Practice Guidance (PPG) (as amended)

6.3.2 The revised National Planning Policy Framework (NPPF) was published in December 2024 and constitutes guidance for local planning authorities as a material consideration in determining planning applications. It sets out the Government's economic, environmental and social planning policies for England and articulates the Government's commitment to a plan-led system where local planning authorities should approve development proposals that accord with the development plan without delay. There are a number of policies contained within the NPPF which are relevant to the Proposed Development and have been key considerations in the design process.

6.3.3 The NPPF sets out three overarching objectives to achieving sustainable development. These are independent but should be sought to be achieved in mutually supportive ways. The objectives are:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

6.3.4 At the heart of the NPPF is a presumption in favour of sustainable development that should run through both place-making and decision-taking. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development on the basis of the following:

- Approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:
 - The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particularly regard to key policies for directly development to sustainable locations, making effective use of land, securing well-designed places, and providing affordable homes, individually or in combination.

6.3.5 Footnote 8 defines out-of-date development plans as situations where the local planning authority cannot demonstrate a five year housing land supply, or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

6.3.6 Chapter 5 sets out the Government's objective of significantly boosting the supply of homes and that it is important that a sufficient amount and variety of land comes forward where it is needed, which addresses specific housing requirements.

6.3.7 Paragraph 77 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed, and supported by the necessary infrastructure and facilities.

6.3.8 Chapter 6 supports the building of a strong, competitive economy, stating that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

6.3.9 Chapter 7 seeks to ensure the vitality of town centres. Paragraphs 91 to 94 requires local planning authorities to apply a sequential test to planning application for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan, along with a retail impact assessment (if there is no locally set threshold, the default threshold is 2,500sqm of gross floorspace).

6.3.10 Chapter 8 seeks to promote healthy and safe communities, requiring planning policies and decisions to promote social interaction, are safe and accessible, and enable and support healthy lives. Planning decision should ensure an integrated approach to considering the location of housing, economic uses, and community facilities and services.

6.3.11 Paragraph 100 highlights that it is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Paragraph 101 applied significant weight on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

6.3.12 Paragraph 103 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change.

6.3.13 Paragraph 104 protects existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, stating that they should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

6.3.14 Chapter 9 requires transport issues to be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. Paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

6.3.15 Chapter 10 seeks to support high quality communications stating that planning policies and decisions should support the expansion of electronic communications networks.

6.3.16 Chapter 11 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improvement the environment and ensuring safe and healthy living conditions.

6.3.17 Chapter 12 aims to achieve well-designed places stating that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

6.3.18 Chapter 14 aims to meet the challenges of climate change, flooding and coastal change, stating that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change.

6.3.19 Chapter 15 seeks to conserve and enhance the natural environment by protected and enhancing valued landscaped, sites of biodiversity or geological value and soils; recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; minimising impacts

on and providing net gains for biodiversity; preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- 6.3.20 Chapter 16 seeks to conserve and enhance the history environment. Paragraph 207 states that in determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.3.21 Chapter 17 highlights that it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.
- 6.3.22 The NPPF is also supported by the national PPG. This provides further guidance on various planning matters relevant to the HPA and such guidance carries equal weight to the NPPF.

HDC Facilitating Appropriate Development (October 2022)

- 6.3.23 HDC have produced the Facilitating Appropriate Development document to set out the Council's aspirations and their position on the weight that can be given to current and emerging policy within the context of current legislation, national policy and guidance.
- 6.3.24 Whilst this has not been subject to consultation or examination it provides further guidance and direction around HDC's expectation for submitted planning applications and how the LPA will consider planning applications as they are received.
- 6.3.25 Through HDC's document Facilitating Appropriate Development (October 2022), HDC have provided further guidance and direction around HDC's expectation for submitted planning applications and how the LPA will consider planning applications as they are received. While this confirmed (as of October 2022) that the policy requirements of the HDPF will be expected to be complied with on most matters, it also recognises the significant time that has passed since adoption of the HDPF. The document, therefore, provides guidance on the approach to current expectations that were being explored under the emerging Local Plan such as biodiversity net gain and water neutrality which differ from the adopted HDPF.

Horsham District Local Plan 2023 – 2040 and Emerging Evidence Base

- 6.3.26 HDC have been preparing a new Horsham District Local Plan 2023 – 2040 (HDLP) which will set out planning policies and proposals to guide development in the District up to 2040.
- 6.3.27 In July 2024, HDC formally submitted the 'Horsham District Local Plan 2023 – 2040 Regulation 19' document (dated January 2024) and supporting documents and evidence base to the Planning Inspectorate for Examination, which included a strategic site allocation for the Site (Strategic Policy HA2 'Land West of Ifield') which allocated the Site for a comprehensive new neighbourhood to deliver approximately 3,000 new homes, of which at least 1,600 new homes will be delivered in the Plan period (i.e. up to 2040).
- 6.3.28 The Examination hearings commenced in December 2024, however, early into the process, the Inspector cancelled the remaining sessions and issued an Interim Findings Report recommending that HDC withdraw the Plan entirely. The Inspector raised significant concerns that HDC had failed to meet the legal "duty to cooperate" with neighbouring authorities and issues with HDC's water neutrality strategy. The Applicant understands that HDC strongly disagree with the Inspector's recommendation.
- 6.3.29 Paragraph 49 of the NPPF (2024) states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - "a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*

- b) *The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) *The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."*

6.3.30 At the time of writing, the Inspector has recommended the Horsham District Local Plan 2023 – 2040 to be withdrawn, and therefore, it is expected that the Horsham District Local Plan 2023 – 2040 will be withdrawn ahead of the determination of this HPA given the stage that the Plan has reached, the concerns raised by the Inspector, and the level and content of the objections received against the Plan / policies.

6.3.31 Therefore, although subject to formal withdrawal which is subject to Council approval, limited, if any, weight is applied to the policies set out in the Horsham District Local Plan 2023 – 2040 Regulation 19 document.

6.3.32 However, the Applicant considers that certain elements of the evidence base prepared in support of the Horsham District Local Plan 2023 – 2040, particularly those demonstrating need, constitute material planning considerations in the determination of this HPA. Where relevant, these elements are referenced throughout this Planning Statement and the accompanying submission documents. This approach is supported by HDC's Inspector's Letter: Frequently Asked Questions (April 2025) which confirms that HDC will continue to attribute weight to up-to-date elements of its evidence base and advises (in paragraph 95) that HDC "*could utilise much of the good and comprehensive work already undertaken before components of the evidence base become out of date*". These references are detailed in the relevant submission documents and Chapter 7 below.

6.4 Weight for Determining the Planning Application

6.4.1 In summary, the following weight should be applied by the relevant decision maker to the adopted development plan policies when determining the HPA at Land West of Ifield:

- HDPF (2015) – significant weight except for the housing supply policies which are considered out-of-date and other policies which are not aligned with national policy (please refer to Paragraph 11 of the NPPF (2024));
- Rusper Road Neighbourhood Plan (2021) – significant weight, as this forms part of development plan;
- West Sussex County Council Joint Minerals Local Plan (2018, revisions in 2021, reviewed in 2023) and Waste Local Plan (2014, reviewed 2024) – significant weight

6.4.2 In addition, the following material considerations apply when the relevant decision maker is determining the HPA at Land West of Ifield:

- NPPF (2024) – this document represents up-to-date government planning policy and must be taken into account where it is relevant to the planning application. In particular, the NPPF establishes that, at the time of submission, there is a presumption in favour of sustainable development in place for application within HDC;
- The PPG (as amended) – this document complements national planning policy set out in the NPPF and explains, clarifies or elucidates the policies in the NPPF to which it relates to;
- HDC Facilitating Appropriate Development (2022) – this document sets out an interim position for how HDC will approach policy matters, which have developed at the national level subsequent to the adoption of the current Local Plan, such as the Environment Act. It, therefore, provides an indication for how HDC will apply policies and weight to adopted policy documents (namely not the document itself) and has been considered in this Planning Statement.

- Emerging Horsham District Local Plan – notwithstanding that limited, if any, weight can be applied to the emerging plan, elements of supporting evidence base provide evidence of up-to-date need which acts as a material consideration. This position is reinforced from the Inspector's Interim Findings letter (dated 4 April 2025), which states (when recommending HDC withdraw the emerging local plan and recommence preparation) "*In doing so the Council could utilise much of the good and comprehensive work already undertaken before components of the evidence base become out of date*".

7. Planning Assessment

7.1 Introduction and Structure

7.1.1 This Chapter identifies key planning considerations, assesses the Proposed Development against the development plan policy and other material considerations and provides planning justification as to why planning permission should be granted.

7.1.2 This Chapter should be read together with the DSPPF, Parameter Plans, Site Wide Design Code, DAS, Environmental Statement and other supporting technical documentation accompanying this HPA. Referenced throughout the Chapter, these supporting documents provide further details on how the Proposed Development will be delivered and the principles that have influenced the design of proposals.

7.1.3 The planning assessment chapter of the Planning Statement follows the structure below in response to policy provisions:

- Principle of Development
- Residential Type, Mix and Tenure (incl. Affordable Housing Statement)
- Employment Type and Quantum (incl. Retail)
- Design and Massing
- Open Space, Play and Sports
- Social Infrastructure
- Transport and Movement
- Walking and Cycling
- Car Parking and Electric Vehicle Parking
- Water Resources and Flooding
- Landscape Visual Impact and Townscape
- Heritage and Historic Environment
- Ecology, Trees, Landscaping and Biodiversity
- Environmental Protection (Air Quality, Noise/Vibration, Lighting, Land Contamination)
- Sustainability and Energy
- Utilities
- Maintenance and Management Approach

7.2 Principle of Development

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 1 'Sustainable Development'
- Strategic Policy 2 'Strategic Development'
- Strategic Policy 4 'Settlement Expansion'
- Strategic Policy 15 'Housing Provision'
- Strategic Policy 26 'Countryside Protection'
- Strategic Policy 27 'Settlement Coalescence'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

HDC's Authority Monitoring Report (April 2025)

Housing Delivery Test (2024)

Planning Policy Assessment

Site Location within the Countryside

7.2.1 Strategic Policy 2 sets out the spatial strategy for Horsham from 2011 to 2031, which seeks to focus development in and around existing settlements and identifies strategic development sites for housing and employment. Whilst the Proposed Development is strategic in nature, Land West of Ifield is not an identified strategic development site in the adopted Local Plan and falls outside of a specific allocation.

7.2.2 The Site is currently located outside of defined settlement boundaries, and is therefore defined as within the Countryside, where development is not typically supported.

7.2.3 Therefore, this HPA is a large-scale greenfield application and in principle, it has been considered under the wider policies concerning the Countryside and development outside of the defined settlement boundaries.

7.2.4 At a principle level, Strategic Policy 2 steers development towards sustainable locations and larger areas of existing settlements. The NPPF (2024) also seeks to focus larger scale development, such as new settlements, in locations which are well-located, and are or can be made sustainable.

7.2.5 Strategic Policy 4 supports the growth of settlements in order to meet the identified local housing, employment and community needs. Outside of built-up area boundaries, the expansion of settlements will be supported where the site is allocated and adjoins an existing settlement; the level of expansion is appropriate; it is demonstrated to meet an identified housing and/or employment need; the impact does not prejudice long-term development; and is contained within an existing defensible boundary, with landscape and townscape character features maintained and enhanced.

7.2.6 Strategic Policy 26 seeks to protect the Countryside against inappropriate development. Strategic Policy 27 protects landscapes and seeks to restrict development between settlements.

7.2.7 The Site is located adjacent to the existing settlement Crawley and its urban form, and is not in an isolated location within the Countryside, and is well located to existing services and facilities. It also provides a substantial amount of social infrastructure. Therefore, whilst not allocated, the Proposed Development,

which should be considered a new settlement in its own right, will be a sustainable development, in a sustainable location, which will meet the day-to-day needs of future residents and existing residents of Horsham and Crawley.

- 7.2.8 Indeed, the evidence base of the emerging Local Plan recognises the suitability of the Site to deliver a comprehensive new neighbourhood that would incorporate the necessary infrastructure, services and facilities for approximately 3,000 new homes.
- 7.2.9 As explained in Chapter 6, the Examination of the emerging Horsham District Local Plan 2023 – 2040 is currently on pause due to concerns raised by the Inspector who has recommended that HDC withdraw the emerging Local Plan. The concerns raised by the Inspector related to the overall quantum of need provided in the spatial strategy, however, no comment has been provided on the individual site allocations (and suitability of these sites for development) during the Examination. Therefore, the baseline position taken within this HPA is that HDC believe the Site is suitable for development, and the emerging allocation Policy HA2 was considered 'sound' by HDC at the point of submission to Examination.
- 7.2.10 On this basis, the emerging evidence base and the draft strategic site allocation Policy HA2 within the Regulation 19 version of the Local Plan has been used as a key design driver for the Proposed Development. This reflects an up-to-date indication of the HDC's aspirations for the local area and long-term spatial strategy.
- 7.2.11 Significant evidence base been produced by HDC has also validated the capacity of the Site to support development. The emerging evidence base demonstrates that the Site has been through a robust consideration process and was deemed an appropriate location for large-scale development by HDC and would assist in meeting the future development needs for Horsham and Crawley.
- 7.2.12 Suitability for development has been tested through the Council's Strategic Housing and Employment Land Availability Assessment (2018). The draft allocation itself has been undergone a series of assessments by HDC to meet the statutory requirements, including a Sustainability Appraisal (alongside other reasonable alternatives), a Strategic Environmental Appraisal, Habitat Regulations Assessment and Equalities Impact Assessment.
- 7.2.13 In addition, the proposals are landscape-led and the scale, function and land uses of the Proposed Development has been discussed extensively with HDC, CBC and WSCC officers and has been subject to extensive public consultation.
- 7.2.14 The Site will provide strategic-scale development in a sustainable location, located adjacent to an existing settlement, which is appropriate for the settlement type and purpose.
- 7.2.15 On the basis that the housing policies in the HDPF (2015) are out-of-date (see below), the current settlement boundaries are also out of date, wider policies seeking to steer development or otherwise limit areas of growth to allocations need to be considered in this context. Greenfield sites outside settlement boundaries will need to come forward in HDC if housing needs are to be met, and consequently a degree of landscape harm, coalescence and conflict with Policies 25, 27 and 27 will need to be considered in this context and should not constrain sustainable development. This is set out by an Inspector in the recent appeal decision ref. 3355546 at Horsham Golf Club (dated 11th July 2025).
- 7.2.16 Further details on the proposed green infrastructure, sensitive lighting, transport movements, and consideration of landscape and townscape are set out further within this Chapter.

Housing Need

- 7.2.17 The NPPF (2024) sets out the Government's objective of significantly boosting the supply of homes, stating that it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed.
- 7.2.18 Increasing the District's housing stock is a key strategic objective of HDC.

- 7.2.19 Adopted Policy 15 'Housing Provision' of the HDPF (2015) seeks to deliver at least 16,000 homes and associated infrastructure within the period 2011 to 2031, at an average of 800 homes per annum.
- 7.2.20 However, the District has a poor rate of housing delivery and the Council's latest Authority Monitoring Report (April 2025) states that the Council can only demonstrate a 1 year housing supply (this does not take into account the emerging site allocations in the draft Local Plan). In addition, Horsham scored 62% in the latest Housing Delivery Test (December 2024). As such, and given the Council's Framework is considered out of date and there is a presumption in favour of sustainable residential development.
- 7.2.21 Indeed, under the new National Planning Policy Framework (2024) and planning reforms, the Government is proposing a new method for determining housing need. For Horsham, the proposed method generates a need figure of 1,294 homes to be delivered per year, which is a 41% increase to the existing target (excluding any consideration of unmet need arising in Crawley).
- 7.2.22 Whilst the exact figure is subject to a moment in time assessment, it is clearly demonstrable there is an acute need for housing within the District.
- 7.2.23 Therefore, in line with Paragraph 11 of the NPPF (2024), there is a presumption in favour of sustainable residential development, and the 'titled balance' is triggered.
- 7.2.24 Importantly, the Site does not comprise any protected areas or assets of particular importance to provide 'strong' reasons for refusal, and the Proposed Development will provide significant public benefits (for example affordable housing, education provision and public open space) in a sustainable location, making an effective use of land and securing well-designed places, in line with paragraph 11(d) of the NPPF (2024).

Indicative Phasing

- 7.2.25 The Proposed Development seeks to deliver up to 3,000 new homes across the Site, which will be a significant contribution to HDC's housing supply.
- 7.2.26 The submitted Illustrative Masterplan outlines one way in which 3,000 new homes along with associated amenities, schools and non-residential uses could be achieved within the areas identified on the Land Use Parameter Plan, with indicative phasing outlined in the Design and Access Statement and Chapter 5 of this Planning Statement.

Necessary Infrastructure for Secondary School (Phase 1)

- 7.2.27 There is no adopted HDC local planning policy basis for the delivery of the CWMMC and other infrastructure proposed within Phase 1. However, there is a strong regional, sub-regional and local-level aspiration for delivering a new strategic transport corridor to the west of Crawley, comprising an integrated, multi-modal corridor between the A2643 and the A23. Indeed, the West Sussex Local Transport Plan acknowledges the CWMMC as a medium term (2027 – 2032) active travel priority.
- 7.2.28 This is captured in the Crawley Borough Local Plan (2024) which considers it appropriate to identify an area of search within Crawley for a potential full Western Multi-Modal Transport Link, in partnership with WSCL, as a result of the potential levels of development, which will need to connect to a route corridor in HDC.
- 7.2.29 The delivery of the first phase of the CWMMC is considered necessary to form part of Phase 1 of the Proposed Development to facilitate the construction and operational traffic for the new Secondary School, to which there is an immediate need.
- 7.2.30 Therefore, this HPA seeks detailed planning permission for the necessary infrastructure required to facilitate the prompt delivery of the Secondary School.
- 7.2.31 Further details on the sustainable transport measures proposed are set out in Chapter 7.7.

Prematurity

7.2.32 In accordance with Paragraphs 50 and 51 of the NPPF (2024), the Proposed Development should not be considered premature.

7.2.33 Whilst the Proposed Development is substantial, proposing up to 3,000 new homes, it does not undermine the plan-making process. Limited, if any, weight has been afforded to the Horsham District Local Plan 2023 – 2040 Regulation 19 document, which although no yet formally withdrawn, is expected during the determination of this HPA. Furthermore, a revised Draft Local Plan is not anticipated to be submitted for Examination in the near future. As such, granting planning permission for the Proposed Development would not predetermine decisions regarding scale, location or phasing of new development.

7.2.34 This HPA is submitted in accordance with the adopted statutory development plan and is supported by this Planning Statement and accompanying documents, which demonstrates its acceptability in planning terms and with regard to material consideration.

7.2.35 Furthermore and in the alternative, this HPA does not meet the criteria set out in paragraph 50 of the NPPF (2024) that would justify refusal on the grounds of prematurity. Given the next iteration of the Draft Local Plan is unlikely to be submitted for Examination before this HPA is determined, there is no basis to conclude that granting planning permission would prejudice the emerging Plan. Accordingly, refusal on prematurity grounds would not be justified.

Summary

7.2.36 On this basis, whilst the Proposed Development seeks to deliver development within the Countryside, the most important policy for determining this HPA (Strategic Policy 15) is considered out-of-date. As such, policies which seek to restrict or otherwise direct areas of growth must be read in this context. In accordance with paragraph 11 of the NPPF (2024), planning permission should therefore be granted unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In this case, the Proposed Development delivers clear and substantial benefits that outweigh any potential harm.

7.3 Residential Type, Mix and Tenure (incl. Affordable Housing Statement requirements)

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 16 'Meeting Local Housing Needs'
- Policy 18 'Retirement Housing and Specialist Care'
- Strategic Policy 23 'Gypsy and Traveller Accommodation'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

Planning Policy Assessment

7.3.1 The Proposed Development seeks to deliver up to 3,000 new homes falling within Class C2 and C3, along with a Class C1 hotel (up to 80 beds) and up to 15 Gypsy and Traveller pitches (*sui generis*).

7.3.2 The Land Use Parameter Plan identifies locations for these residential land uses within the Site.

7.3.3 The overall mix, including the overall percentage and tenure of affordable housing, will comprise an opportunity to deliver a broad mix of different types of housing.

7.3.4 To ensure policy compliance at RMA stage, the Site Wide Design Code sets out design parameters for the proposed housing. All homes will meet the minimum gross internal floor areas for new residential homes that are set out within the Nationally Described Space Standards (2015). In addition, all affordable homes will be accessible and adaptable (M4(2) compliant) homes), unless otherwise proven in subsequent RMAs.

Housing Mix

7.3.5 Strategic Policy 16 of the HDPF states that the appropriate mix of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and viability of the schemes.

7.3.6 The Proposed Development seeks to deliver diverse housing in a way that best meets local needs. However, a more nuanced approach is proposed in relation to the proposed housing mix, particularly due to the Site's unique relationship with CBC.

7.3.7 The proposed housing mix is based on a blend mix from HDC and CBC, and has been discussed and agreed during pre-application discussions.

7.3.8 Indeed, the residential element of the Proposed Development is subject to future RMAs. The market and affordable housing mix, type and tenure within the Proposed Development will be refined as the development is built out over a number of years, responding to identified need at that time. Flexibility is necessary to enable the homes to be determined with reference to the detailed designs of individual block layouts, their floorspace efficiencies and appropriate sizes at the time homes are applied for at the RMA stage. The proposed illustrative housing mix is a blended rate from HDC and CBC's respective evidence base documents and set out below.

7.3.9 The following housing mix is proposed:

Type	Flat		House			Total
	1-bed	2-bed	2-bed	3-bed	4-bed +	
No. of Homes (%)	15%	20%	9%	36%	20%	100%
	35%		65%			

7.3.10 Further detail on the assumed housing mix and how this has informed the proposals can be found in the accompanying Infrastructure Delivery Plan.

Tenure

7.3.11 The provision of affordable homes reflects the aims of the NPPF (2024) to deliver a wide choice of high-quality homes, create inclusive and mixed communities and deliver a wider range of tenures.

7.3.12 Strategic Policy 16 of the HDPP identifies that HDC has a target of 35% affordable housing for residential developments of 15 homes or more or on sites over 0.5ha. The policy states that HDC's preferred option is for affordable housing to be provided on-site. Where it can be demonstrated that on-site provision is not suitable, a financial contribution will be sought

7.3.13 The Proposed Development seeks to deliver up to 3,000 homes, of which 35% (1,050 homes) will be provided as affordable homes in line with the policy requirement.

7.3.14 It is anticipated that a Registered Provider will be engaged to deliver and manage the affordable homes in partnership with HDC. Detailed discussions regarding the delivery mechanism, location and tenure mix will be undertaken at the RMA Stage, once overarching principles of affordable housing provision have been agreed with HDC.

7.3.15 The provision of affordable housing will be secured by the Section 106 Agreement.

Custom and Self Build

7.3.16 There is no current policy requirement to deliver Custom and Self Build housing, however, the Proposed Development seeks to deliver 2.5% of the proposed housing as Custom and Self Build typologies which will be accessible to those registered on HDC's Self and Custom Build Register of Interest.

7.3.17 According to the HDC's website⁵, as of 31 March 2025, there are 166 entries on HDC's Self and Custom Build Register of Interest, of which 118 are HDC residents and 48 are outside of HDC.

7.3.18 Therefore, the delivery of 2.5% custom and self build plots will make a meaningful and significant contribution to the demand within the district.

7.3.19 The Applicant anticipates that a planning condition will be attached to the outline planning permission element requiring the preparation and implementation of a Custom and Self Build Marketing Strategy. This strategy will set out the approach to the phased delivery of custom and self-build plots, ensuring alignment with the overall development timeline and policy objectives.

Specialist Housing

7.3.20 The Proposed Development includes flexibility for Class C2 development to be provided as part of the Land Use Parameter Plan.

⁵ <https://www.horsham.gov.uk/planning/planning-policy/self-build-and-custom-build-homes> (accessed: 17/07/2025)

7.3.21 Policy 18 of the HDPF states that proposals for development which provide retirement housing and specialist care will be encouraged and supported where it is accessible by foot or by public transport to local shops and amenities.

7.3.22 The delivery and design of Class C2 specialist housing will be confirmed at RMA stage.

Gypsy and Traveller Pitches

7.3.23 Whilst the Site is not allocated for use as a Gypsy and Traveller site, the Proposed Development includes the provision of up to 15 gypsy and traveller pitches within the Site, which may be located within the flexible zone identified on the Land Use Parameter Plan.

7.3.24 Strategic Policy 23 of the HDPF sets out a range of criteria to be considered when determining planning applications for Gypsies, Travellers and Travelling Showpeople.

7.3.25 The Illustrative Masterplan demonstrates one potential approach to delivering the Gypsy and Traveller pitches on a single site within the red line boundary. However, a number of alternative locations (totalling up to 15 pitches) could be considered within the flexible zone highlighted on the Land Use Parameter Plan allowing for adaptability in response to site-specific considerations.

7.3.26 The Applicant's commitments to this provision is secured through the Draft Heads of Terms which adopts a cascade approach to delivery, recognising the practical challenges associated with securing an end user. Further details are set out within the Draft Heads of Terms submitted alongside this application.

7.3.27 It is noted that the final location, design and total number of the Gypsy and Traveller pitches will be confirmed at RMA stage and will only be required to comply with the requirements set out within Strategic Policy 23, unless otherwise justified through the subsequent RMA submission.

Summary

7.3.28 On this basis, the Proposed Development accords with Strategic Policies 16 and 23 and Policy 18 of the HDPF (2015) and national policy on residential standards.

7.4 Employment Type and Quantum, including Retail and Tourism

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 7 'Economic Growth'
- Policy 9 'Employment Development'
- Policy 11 'Tourism and Cultural Facilities'
- Policy 13 'Town Centre Uses'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

Retail Commercial Leisure and Town Centre Neighbourhood Needs Assessment (Crawley Borough Council, 2020)

Planning Policy Assessment

7.4.1 The Proposed Development seeks to deliver employment floorspace, along with a new Neighbourhood Centre comprising retail uses and a hotel (up to 80-beds). Details are set out below.

Employment

7.4.2 Strategic Policy 7 of the HDPF states that HDC are seeking to achieve sustainable employment growth within the Plan period (2031).

7.4.3 Whilst the Site is not allocated for employment uses, the Proposed Development seeks to deliver employment uses falling under Class E, B2 and B8 within the River Valley Character Area and Class E uses in the Neighbourhood Centre. The River Valley Character Area is conveniently situated near the local centre, benefitting from easy access via the CWMMC.

7.4.4 The vision for employment at West of Ifield is to meet the needs of the Proposed Development, contribute to sustainable community, be a catalyst for wider regeneration, and complement Manor Royal and Crawley town centre in a manner that is additional by design.

7.4.5 The proposed employment uses has taken into account a number of key factors and design parameters that will ensure that it is strategically located and able to establish a working environment that will appeal to businesses and employees alike, including:

- A location that provides immediate access to the proposed CWMMC, and ultimately giving very easy access to Manor Royal Business District;
- Proximity to the proposed Neighbourhood Centre, via an easy walk or public transport;
- Proximity to residential communities, with the opportunity to create a mixed use 'hub' (commercial and residential use) around the main access to the employment zone;
- The potential to create an attractive and sustainable environment, with the site bounded by a Green Corridor to the south, a neighbourhood park and sports hub to the west and significant accessible green space to the north.

7.4.6 The flexibility of the plots in the types of employment land uses allows the land to adapt to market changes. In addition, Plots RV1 and RV2 are flexible employment / residential zones where either land use can be brought forward to promote a live-work environment.

7.4.7 The HPA will secure up to 5,200sqm of Class B2 floorspace and up to 7,200sqm of Class B8 floorspace along with Class E, which will be refined at RMA stage. The flexible Class E, Class B2 and Class B8 plots allows for provision of a range of business accommodation, which complement each other and encourage success of businesses. Maximum floorspace figures will be secured as it is unknown at this stage the floorspace required to meet market demand.

7.4.8 An Employment and Economic Development Strategy has been prepared by SQW in support of the HPA to demonstrate the phased delivery of an appropriate number and diversity of jobs to ensure a balance between population and job growth, and promote economic growth and prosperity for local communities. The Employment and Economic Development Strategy is defined around the following core elements:

- Making provision for enterprise and innovation;
- Designing in provision for a range of flexible, business accommodation;
- Developing an integrated Neighbourhood Centre;
- Developing a strategy for accommodating working from home.

7.4.9 The objectives behind the Employment and Economic Development Strategy for West of Ifield as are follows:

- Provides a wide range of flexible, different sized and specified floorspace that potentially changes over the years (given that delivery is probably going to span 10+ years), and needs to accommodate a mix of users
- Includes the flexibility to grow the floorspace internally (via mezzanine floors, etc.) as requirements change / grow; and
- Enables development to be programmed in a number of phases, whilst providing the flexibility / mix required.

7.4.10 In order to ensure the component parts of the EEDS are delivered, a number of strategies will be secured, including:

- Working with the local authorities and other stakeholders to ensure that the EEDS reflects the current economic and market conditions, the position with regard to competing / complementary development projects in the area (and in the pipeline), and the needs of businesses in the area;
- The development of a Marketing Strategy to be linked to the EEDS, and to provide an action plan and programme of activities; and
- The development of a Local Employment Strategy, to ensure that local people are able to participate fully in employment opportunities linked to West of Ifield, both during its construction and as employment provision comes forward.

7.4.11 The Applicant is committed to implementing the EEDS and undertake a review every two years in dialogue with HDC and CBC to ensure that it continues to be relevant and appropriate. Further details are set out in the EEDS, which accompanies this application.

Jobs

7.4.12 As set out within Chapter 13 of the Environmental Statement, it is anticipated that the construction of the Proposed Development will generate an average of 1,369 FTE jobs, and a range of 1,352 to 1,396 FTE jobs for the Completed Development stage.

Design Requirements

7.4.13 The Building Heights Parameter Plan sets out the design requirements for the proposed employment uses at the River Valley Character Area. They reflect a maximum of up to 10m with the potential for up to 16m in plots RV2 and RV3 along the CWMMC frontage, with a maximum of 20m in RV1.

7.4.14 **The Neighbourhood Centre and Retail**
The Proposed Development seeks to deliver a new Neighbourhood Centre located centrally within the Site, as illustrated on the Land Use Parameter Plan and the Illustrative Masterplan, and will comprise a mix of uses including Class E, F1, F2 and *sui generis* along with residential uses (Class C2 and C3) and hotel use (Class C1).

7.4.15 The Neighbourhood Centre is intended to provide the focus for the new community. The central hub will not only provide essential amenities and services for residents but will also foster a sense of community and connection. It will include a range of local facilities to meet day-to-day needs of the community, including shops, services, leisure and community infrastructure, including health. It will feature appropriately sized commercial units as well as key services to ensure that it has the vitality and viability to remain successful over the lifetime of the Proposed Development and positively contribute to the creation of a sustainable new community.

7.4.16 The Proposed Development seeks to secure a maximum of 5,200sqm of Class E(a) floorspace, including a food store.

7.4.17 Given that the Proposed Development includes over 2,500sqm of retail uses outside of a defined town centre, in line with national and local planning policy, the HPA is supported by a Retail Impact Assessment has been prepared by Montagu Evans in support of this HPA, on the basis that main town centre uses are proposed outside existing town centres.

7.4.18 A retail sequential assessment has been undertaken to review sites that can accommodate the development as a whole within and edge of Crawley Town Centre and Broadfield Neighbourhood Centre. The Proposed Development cannot be disaggregated and all the uses are integral to the character and function of the whole mixed-use scheme. There is a clear location specific need for the proposed retail floorspace to form part of, or to be located close to the proposed residential and other community uses. No sites were considered to have the capacity of accommodating the development proposals and as such the sequential test, set out in Paragraphs 91-93 of the NPPF (2024), is passed.

7.4.19 The scale and nature of retail provision within the Proposed Development, particularly the foodstore, is at a level to cater for daily needs of the residents within this application and will complement but not compete with existing town centre. It is important to note that the retail element of the Proposed Development will not only help to create a sustainable neighbourhood, but will also benefit the wider Ifield and Bewbush residential areas. Therefore, both existing and new residents will be able to take advantage of the services within the Proposed Development. It is also considered that expenditure by new residents may also extend to Crawley, contributing to its vitality and viability.

7.4.20 The main conclusions of the Retail Impact Assessment are as follows:

- The residential element of the Proposed Development will create enough expenditure to support the proposed comparison retail floorspace, and most of the proposed convenience retail floorspace.
- The latest Crawley Retail Study (2020) identifies a significant need for additional comparison and convenience floorspace by 2035, and whilst the location is just order the border in HDC, the Proposed Development can help to meet this need in a sustainable location.

- As a worst case scenario, it is considered that 95% of trade will be diverted from stores within Crawley, however the Proposed Development would not lead to an impact on any designated centre that could be considered as 'significant'.

7.4.21 The Retail Impact Assessment concludes that the Proposed Development will not have a 'significant adverse impact' on the vitality and viability of the defined centre, or any planned investments.

Hotel

7.4.22 The Proposed Development also seeks to deliver a hotel comprising up to 80 rooms.

7.4.23 Hotels are a main town centre use, as defined in the NPPF (2024), and therefore, its location within the Neighbourhood Centre and the River Valley is considered appropriate, and will provide accommodation for visitors and business visitors, in line with Policy 11 of the HDLP (2015).

7.4.24 Details of the hotel will be refined at RMA stage.

Summary

7.4.25 On this basis, the Proposed Development aligns with Strategic Policy 7 and Policies 9, 11 and 13 of the HDPF (2015), and national policy on economic growth and retail.

7.5 Design and Massing

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 32 'The Quality of New Development'
- Policy 33 'Development Principles'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

Planning Policy Assessment

7.5.1 Paragraph 131 of the NPPF (2024) outlines the fundamental importance of the creation of high-quality buildings and places and what the planning and development process should achieve. Good design is considered a key aspect of sustainable development and creating better places in which to work and live.

7.5.2 Strategic Policy 32 of the HDPF (2015) requires all development to be high-quality and incorporate inclusive design. Policy 33 sets out development principles to ensure developments are of a high quality, well designed and take into account the existing character of the areas.

7.5.3 Phase 1 of the Proposed Development relates to the delivery of access, roads (including the CWMMC and the Primary Street) and other infrastructure for the wider Site, along with high-quality landscaping. The design of the Phase 1 infrastructure supports the place making goals of the Proposed Development, in line with the Site Wide Design Code.

7.5.4 The design of the CWMMC has evolved following discussions with WSCC. The CWMMC is surrounded by proposed landscaping which will embed the road into the existing landscape through sustainable design approaches including the implementation of SuDS and native planting.

7.5.5 The design of the Primary Street, which will be the central artery in the Proposed Development and lead to the secondary school, aligns with the standards set out in the Manual for Streets and the WSCC highways adoptable design guidelines. These standards ensure that the road is not only functional but also safe and accessible for all users. The street incorporates SuDS and green infrastructure to improve the visual appearance of the proposed road infrastructure.

7.5.6 In terms of the wider development, as set out within the DAS, the masterplan has been thoughtfully structured into four distinct character areas, comprising a range of appropriate densities, building heights and typologies, to create a strong sense of place. Each character area boasts a unique mix of uses, building typologies, landscape features, and well-connected multi-modal transportation network. These areas will form distinctive communities, each with its own identity and character. The four areas are:

- **Neighbourhood Centre:** This Character Area will play an important role in establishing the identity of the new community as a whole and represents the heart of the development. It is envisaged as a mixed-use urban area. The Character Area is split into three sub-character areas: Local Centre, Urban Living, and Primary and Secondary School.
- **Hillside and Woodlands:** This Character Area is situated to the south of the Neighbourhood Centre, and is characterised by a ridge-line to the north and ancient woodland to the site. Housing will generally be lower density compared to the Neighbourhood Centre.

- **The Meadows:** This Character Area is defined by its centrepiece, Meadows Park, and will offer a diverse range of housing options to accommodate a variety of lifestyles and needs.
- **River Valley:** This Character Area is predominantly the employment area, home to businesses within the Community, with mixed-use residential and employment uses located along the CWMCC frontage.

7.5.7 The HPA is supported by a Site Wide Design Code which sets out a set of design 'rules' which will inform future detail design. The Site Wide Design Code is submitted for approval and it is anticipated that this document will form the basis of a planning condition on the grant of planning permission for the HPA, requiring that subsequent Detailed Design Codes for a neighbourhood or phase are brought forward as part of the RMAs (where applicable) and are approved prior to the RMAs being granted. The requirement for Detailed Design Codes is expected to exclude particular elements, such as enabling infrastructure works and individual elements such as pavilions or key community buildings.

7.5.8 Each subsequent Detailed Design Code will prescribe, at a greater level of resolution than the Site Wide Design Code, how the details approved through Site Wide Design Code are to be applied in that area.

7.5.9 The Site Wide Design Code will ensure that the scale, massing and appearance of the Proposed Development is of a high standard of design and layout, in line with Policy 33 of the HDPF, and ensures that the Proposed Development relates sympathetically to the wider surroundings and landscape. Materials, finishes and landscaping will be confirmed in subsequent RMAs and Detailed Design Codes.

7.5.10 Each RMA will need to demonstrate compliance with the Site Wide Design Code and the Detailed Design Code where relevant. This approach is appropriate for a strategic site of this size which is to be built out over a number of years.

7.5.11 The Illustrative Masterplan has been prepared to represent one way in which the Proposed Development could come forward within the parameters set by the approved 'control' documents of the DSPPF and the Site Wide Design Code. The Illustrative Masterplan has been an iterative process used as part of engagement with stakeholders. The Illustrative Masterplan has, therefore, been shaped and adjusted to reflect extensive feedback received during the engagement process.

7.5.12 In addition, a Building Heights Parameter Plan is submitted alongside the application for approval which identifies the maximum building heights for the Proposed Development across the Site. Taller heights are allowed for within the central part of the Site where the Neighbourhood Centre is proposed, with lower building heights located closer towards the boundary of the Site. Further details of building heights are set out in the Site Wide Design Code and their comprehensive testing set out in Chapter 11 of the Environmental Statement and relevant appendices.

7.5.13 For further details of the design and massing of the outline element of the Proposed Development, please refer to the DAS and the Site Wide Design Code.

Summary

7.5.14 On this basis, the Proposed Development accords with Strategic Policy 32 and Policy 33 of the HDPF (2015) and national policy on design.

7.6 Open Space, Play and Sports

Relevant Statutory Development Plan Policy

HDPE (2015)

- Policy 43 'Community Facilities, Leisure and Recreation'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

HDC Sport, Open Space and Recreation Study (2021)

Planning Policy Assessment

7.6.1 The NPPF (2024) states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

7.6.2 Policy 43 of the HDPE (2015) states that the provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Sport, Open Space and Recreation Study (June 2021) and other relevant studies, or contribute to the provision of Green Infrastructure.

7.6.3 The Proposed Development is landscape-led and, as such, the proposals seek to incorporate formal and informal open space, sport and recreation provision to meet the needs of the new community. The overall Green Infrastructure strategy of the HPA is delivered through a combination of detailed proposals within the detailed element, other areas secured as part of the outline parameter plans, with a final set of commitments to open space standards and design within the outline element via planning conditions and the Site Wide Design Code.

Loss of Ifield Golf Course

7.6.4 This element of the Planning Statement provides the validation requirement for the Open Space Assessment, in tandem with the information provided within the Golf Course Assessment and associated annexes including the Golf Needs Assessment (Part A), the Sports Strategy (Part B), Potential Golf Investments Report (Part C) (redacted) and the NPPF Paragraph 103 Assessment (July 2024) (Part D) to support the Applicant's representations to the emerging Horsham District Local Plan 2023 - 2040.

7.6.5 An element of the Site was previously owned by Ifield Golf and Country Club (a private members club) which subsequently sold the grounds to the Applicant.

7.6.6 Whilst the Applicant now owns the land and has led the preparation of the Proposed Development, at the writing, the Site is currently operated as an 18-hole golf facility under lease to Ifield Golf and Country Club. The Proposed Development will result in the loss of the existing golf course facility. It is noted that Ifield Golf and Country Club was previously part of a consortium promoting the site for redevelopment prior to its acquisition by the Applicant.

7.6.7 Paragraph 104 of the NPPF (2024) restricts development on existing open spaces, sports and recreational buildings, including playfields, unless the following can be demonstrated within the planning application:

"a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

7.6.8 Policy 43 of the HDCPF (2015) also protects existing community, leisure and recreational facilities, stating that proposals that would result in the loss of sites and premises for such uses will be resisted, unless equally usable facilities can be conveniently provided nearby. The policy states that it will be necessary to demonstrate that continued use of a community facility or service is no longer feasible. However, Policy 42 goes on to state that where it cannot be demonstrated that such a loss is surplus to requirements, a loss may be considered acceptable provided that:

- a. An alternative facility of equivalent or better quality and scale to meet community needs is available, or will be provided at an equally accessible location within the vicinity; or
- b. A significant enhancement to the nature and quality of an existing facility will result from the redevelopment for alternative uses on an appropriate proportion of the site.

7.6.9 Paragraph 104 of the NPPF (2024) reflects the longstanding national approach to protecting existing open space and recreation and, therefore, is considered in turn below.

7.6.10 The HPA is supported by a Golf Course Assessment that has been prepared following a request by HDC during pre-application discussions, and has been informed by evidence and guidance prepared by Sport England and England Golf. The Assessment and associated annexes considers the loss of the Ifield Golf and Country Club, provides an overview of the supply and demand position before exploring different mitigation options and delivery options to demonstrate that there are a number of realistic options for mitigating the loss of Ifield Golf and Country Club, in line with national policy requirements.

7.6.11 The assessment of Paragraph 104 is set out below.

7.6.12 It is important to note that the approach to Paragraph 104 has been informed by case law. This has determined that it is not a requirement that all three limbs of Paragraph 104 are met; namely the exceptions are treated as alternatives via the use of 'or'. The policy also does not establish a sequential approach, i.e. there is no requirement to demonstrate that part (b) cannot be met before considering part (c). In addition, the policy does not establish a hierachal approach and the exceptions should be treated as alternatives of equal weight or value.

7.6.13 In short, only one circumstance outlined in paragraph 104 needs to be met for a proposal to be considered policy compliant. Furthermore, if compliance with the policy is achieved, there is no adverse impact to weigh in a planning balance in determination. Although considered further below, in this scenario alternatively there may be a beneficial impact of the replacement provision under limb B and C to be considered.

7.6.14 Whilst for completeness, all three parts of Paragraph 104 have been considered, the submission documents demonstrate that a comprehensive mitigation package, which is achievable, to deliver alternative sports and recreation on-site and secure golf-specific mitigation as a financial contribution within the Section 106 Agreement. The benefits of this mitigation package is considered to outweigh the loss of the Ifield Golf and Country Club, in line with limb (c) of the NPPF (2024).

7.6.15 This is set out in turn below.

Assessment of Paragraph 104*Supply and Demand for Golfing Facilities*

7.6.16 Limb (a) requires the following to be demonstrated:

"a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;

7.6.17 A Golf Needs Assessment (GNA) has been undertaken as part of the Golf Course Assessment , which has assesses the golf supply and demand within the Ifield Golf and Country Club catchment area (20-minute drive). It has done this to understand the role the current provision provides in terms of offer and 'niche' in the golfing community. It is important to note that there is no prescribed means of carrying out a Golf Needs Assessment. However, the methodology (as explained within that document) follows best practice and has been discussed with England Golf, although it is noted there is no fixed methodology for approaching this.

7.6.18 The GNA identified that there are a range and variety of golf facilities within the catchment that are at a good standard in terms of overall quality, and there is spare capacity for new members (albeit at higher pricing than Ifield Golf Course). The GNA concludes that in the event of Ifield Golf and Country Club closing, and in combination with other potential closures (notwithstanding these are yet to be approved) there will be a negative impact on golf supply within the catchment, taking the overall provision within the catchment slightly below the County average. However, it is considered that the greatest impact will be on the existing members of Ifield Golf and Country Club rather than the broader golfing community.

7.6.19 Therefore, whilst there is a relatively good level of provision of golf facilities in the catchment area, it cannot be concluded that there is surplus to the requirement. This assessment applies regardless of the decision by the Ifield Golf and Country Club's decision to sell the land beneath the course.

7.6.20 Furthermore, it is acknowledged that recently an appeal (ref. 3355546) has been allowed at Horsham Golf Club which would result in the closure of the existing golf facility for residential-led mixed-use development, including a sports and leisure hub. The GNA has considered the potential impacts of both Horsham Golf Club and Ifield Golf and Country Club and concludes that the proposed mitigation can still accommodate the displaced members of Ifield Golf and Country Club if both Horsham Golf Club and Ifield Golf and Country Club are both lost.

7.6.21 As a result, limb (a) is not relied upon to demonstrate acceptability of the loss of the Ifield Golf and Country Club in line with Paragraph 104 of the NPPF (2024).

Providing Equivalent or Better Provision in a Suitable Location

7.6.22 Limb (b) requires the following to be demonstrated:

"b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;"

7.6.23 Under limb (b) the Proposed Development is not required to deliver a like-for-like or quantitative replacement golf facility to mitigate the loss of Ifield Golf and Country Club. Case law, and most recently the Gately Golf Club appeal decision (ref. 3349825), has determined that equivalent or better provision referred to in Paragraph 104 limb (b) is more open to a professional planning judgement and does not require a like-for-like replacement both in terms of sporting activities (i.e. golf for golf) or the amount of land.

7.6.24 Instead, through the GNA work and validated through discussions with Sports England and England Golf, it has been considered more appropriate to offset the loss of Ifield Golf and Country Club through a broader mitigation package comprising qualitative and quantitative improvements at other golfing facilities within the 20-minute drive catchment to increase attractiveness to displaced members and increase utilisation of existing facilities. This is considered to mitigate the current role that Ifield Golf and Country club provided within the existing provision.

7.6.25 The GNA has reviewed a number of existing golf facilities within the catchment for opportunities for further investment and improvements. This has identified that there is a limited 'leisure and recreational' offer within a number of existing golf facilities, and an opportunity to increase capacity and quality of provision for 'regular golfers'.

7.6.26 Tilgate Forest Golf Centre, Rookwood Golf Course and Goffs Park Pitch & Putt have been identified as candidates to implement the proposed mitigation package, including the following:

- Improve the golf infrastructure at Tilgate Forest Golf Centre, to realise the course potential for traditional golfers;
- Continue to diversify the leisure and recreational offer at Tilgate Forest Golf Centre to attract new golfers;
- Support ongoing course improvements at Rookwood Golf Course alongside consideration of widening the offer to deliver more entry level participation; and
- Improvements to the leisure offer at Goffs Park Pitch & Putt.

7.6.27 The preparation of the golf-led off-site mitigation package has been led through discussions with Sports England and England Golf. However, it is recognised that the mitigation package will need to be secured by an obligation in the Section 106 Agreement to enforce an off-site funding contribution towards the delivery of the proposed off-site improvements at the relevant phase.

7.6.28 As part of preparing this planning application, work has been undertaken (see Part C (redacted) of the Golf Course Assessment) to define a comprehensive mitigation package and to assess the effectiveness, feasibility and deliverability of the proposed mitigation measures. This has informed discussions around the future mitigation package to be secured through the Section 106 Agreement. An initial assessment has also been undertaken to determine whether planning permission would be required to lawfully implement the proposed mitigation works. The deliverability of these measures is supported by the fact that the relevant land is owned by a Local Authority and further underpinned by detailed feasibility work and costings undertaken in collaboration with the owner and facility operators. Accordingly, there is a high degree of confidence that the existing facility can be replaced, in accordance with the requirements of limb b ensuring compliance with relevant planning policy.

7.6.29 Therefore, the Golf Course Assessment and relevant Annexes demonstrate that off-site improvements can be secured to deliver meaningful investment towards the betterment of existing golf facilities within the catchment area which will offset the loss of the Ifield Golf and Country Club. This proposal would, therefore, meet the requirements of limb (b) of Paragraph 104 of the NPPF (2024). This Applicant welcomes discussions with HDC on this matter post-submission to ensure the Section 106 Agreement captures this proposed mitigation.

Alternative Sports and Recreation Provision

7.6.30 Limb (c) requires the following to be demonstrated:

"c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

7.6.31 This limb does not require golf to form part of the provision (notably via reference to 'alternative') although golf-specific mitigation would also contribute to the wider assessment of the additional recreation provision.

7.6.32 As demonstrated in the Design and Access Statement and the DSPPF, the Proposed Development seeks to incorporate a wider range of sports and recreation provision, including a Local Leisure Facility including swimming pool, outdoor sports provision, indicatively including football pitches, cricket squares, artificial grass pitches, padel and tennis courts, alongside provision for hockey (further details set out in the Sports Strategy, prepared by Sports Planning Consultants and summarised in Table 7.1 below), providing a significant increase and diversification of new sport opportunities on the Site than currently exist.

7.6.33 The proposed range of facilities seek to accommodate in excess of the policy requirements for sports and recreation provision generated by the Proposed Development.

7.6.34 The Proposed Development can make a meaningful contribution to the mix of sporting provision in the area, diversifying and creating new sporting opportunities. There is also an opportunity for the new provision to be designed in conjunction with future users and relevant sporting bodies to ensure it responds to the local needs and is designed to be required standards. Purpose built facilities can also be designed flexibly to adapt to future demand changes.

7.6.35 By providing facilities in excess of generated demand and informed by assessment of local facilities, it will make a positive contribution to addressing sports deficits within the wider area and will be more accessible for the local population. Indeed, these facilities would not be for exclusive use by new residents and therefore it is reasonable to consider that they would also benefit existing residents and enhance overall accessibility to formal sport provision to those living close to the site.

7.6.36 A key indicator of accessibility is cost and the ability for the local population to access the facility on a regular basis. The variety of sport provided for will reduce the 'cost point of entry' for sport compared to the existing golf course and comparatively high membership fees. In addition, it is estimated that the Proposed Development will generate 10 times more annual visits than Ifield Golf and Country Club, catering to wider (and younger) demographic.

7.6.37 Furthermore, the intention of the policy wording is broad, covering "sports and recreation" in its entirety. It is therefore reasonable to consider both in their widest sense – for example, "recreation" can be both active and passive, and it would include access to open spaces, play equipment, walking and allotments.

7.6.38 At present, the wider Site comprises very limited formal recreation provision as there is no permitted access to the Site beyond the PRoWs. The Proposed Development seeks to deliver a wider range of facilities and recreation provision which will cater for a broader demographic and a number will be free of charge (e.g. playing fields, play facilities, bike trails, Ridgeway Park and River Valley Park), as well as be more accessible and inclusive for the existing and future local population. Therefore, the proposed recreation provision will be more accessible than existing and is a significant public benefit of the Proposed Development for both existing and future residents.

7.6.39 At a minimum, the delivery of the proposed sports and recreation provision on-site will be secured through the following mechanisms:

- The DSPPF and embedded Parameter Plans include locations for identified formal sports provision set out in the Sports and Recreation Strategy, as well as minimum commitments to areas of landscape,

green infrastructure and active mode connections, as well as community and recreational infrastructure;

- Illustrative testing has demonstrated the proposed provision is feasible and can be delivered within the areas identified
- The Sports and Recreation Strategy to be conditioned and require a phase-specific sports strategy details to be submitted as part of RMA stage, to show how areas for sport (in an arrangement validated as considering up to date local need) will be laid out and meet identified needs at the point of submission, including liaison with providers to ensure long term management and maintenance, and ultimate success, of the provided facilities; and
- A minimum floorspace commitment for a Local Leisure Facility (3,400sqm) to be secured via the Section 106 Agreement.

7.6.40 Therefore, the benefits of the proposed sports and recreation provision (including active travel opportunities) clearly outweigh the loss of the Ifield Golf and Country Club, in line with limb (c) of Paragraph 104 of the NPPF (2024). The Proposed Development will make a significant and positive contribution to the wider strategic sporting and recreational needs, improving overall accessibility for the wider population ad a number of sports. When compared to the current sporting and recreational provision on site, the benefits of the proposed provision significantly and demonstrably outweigh the loss of the golf facility.

7.6.41 In the alternative to the above position that proposal meets the test set out in limb b, it is also demonstrated that Limb C is satisfied and can be secured via a combination on conditions and obligations on the outline element of the proposed development.

7.6.42 Indeed, it is worth noting that the release of the golf facility for residential-led mixed-use development has been considered extensively by HDC during the preparation of the Horsham District Local Plan 2023 – 2040 and appropriate on the basis of HDC's consideration that draft Policy HA2 was considered 'sound' at the point of submission for Examination.

Conclusion

7.6.43 In summary, the following conclusions can be drawn from the Golf Course Assessment:

- As set out in the Golf Needs Assessment element of the GCA, there is a quantitative under-provision, but that this is only part of the picture, and that a more holistic approach to addressing societal recreational needs is warranted;;
- Even if IGC cannot be definitely be determined as surplus to requirements, this would not justify refusal of a planning application;
- 'Like for like' replacement of golfing facilities is not required or considered appropriate or most effective to mitigate the loss of the Ifield Golf and Country Club;
- A package of golf-led off-site mitigation will improve and enhance existing golf facilities within the catchment area, in turn providing better provision in terms of accessibility to user groups, quantity and quality, meaning that limb (b) can be met in isolation and can be secured in the Section 106 Agreement. These measures have also been shown to be deliverable to an extent proportional to the staged and outline nature of the development;
- The Proposed Development delivers an extensive range of sports and recreational provision on-site, increasing accessibility for formal and informal provision which caters to wider demographic (both in terms of existing and future residents), meaning that limb (c) can be met in isolation and can be secured in the Section 106 Agreement;
- To address Paragraph 104, the Applicant proposes a combined mitigation package, which is achievable, to deliver sports and recreation on-site and secure golf-specific off-site mitigation as a

financial contribution within the Section 106 Agreement. The benefits of this mitigation package is considered to outweigh the loss of the Ifield Golf and Country Club.

7.6.44 Whilst engagement has been undertaken with Sports England and England Golf, the decision maker (in this case HDC) is responsible for determining if the Proposed Development delivers a better or equivalent sports and recreation package as this is a planning judgement. This has been recently explored in the recent approval for development on the Maidenhead Golf Course (under application reference 24/00091/OUT).

7.6.45 On this basis, the Proposed Development is in accordance with Paragraph 104 of the NPPF (2024).

Proposed Open Space and Accessible Green Space

7.6.46 The approach to masterplanning of the Proposed Development has been landscape-led and the Masterplan response reflects a commitment to the creation of a place that is true to its West Sussex context.

7.6.47 The Masterplan provides a significant amount of public open space, delivering a rich and diverse patchwork of parks, woodland, play areas, habitats, ponds, and orchards for the benefit of the community and the natural environment. Variety and interest has been built into the Masterplan, creating excitement and legibility in the urban and landscape fabric. High quality design will be ensured through the delivery of a Site Wide Design Code at the strategic and local level.

7.6.48 The green infrastructure will include natural and semi-natural green space, parks and gardens and connective green infrastructure, as well amenity green space, allotments, grass pitches, artificial pitches, Multi-Use Games Areas (MUGAs), tennis and multi-courts.

7.6.49 The overprovision in quantitative terms outlined within the DSPPF demonstrates creating a strong, attractive recreational infrastructure in a walkable, vibrant and social landscape that enhances the natural environment and ensures a climate resilient approach.

7.6.50 As the Site currently has no authorised access beyond the PRoWs, the new green infrastructure will provide significant amenity benefits to new and existing residents, as well as delivering a range of other benefits including, but not limited to: biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.

Proposed Sports and Play Provision

7.6.51 The area for formal recreation, informal open space, sports provision and play areas are shown on the Landscape Parameter Plan and outlined in more detail within the DAS. The sports pitch provision will be allocated in the Grove Sports Hub. This location has been determined to be accessible via the key movement corridors.

7.6.52 The area is of a size and scale to accommodate a number of different types of pitches depending on the local and emerging community needs which will be determined through future discussion with Sports England and confirmed at RMA stage. The impact of lighting and associated mitigation has been tested to allow for it, should they be chosen for such activities that require lighting, to be used all year round.

7.6.53 Play spaces form a key part of the multi-functional green infrastructure strategy with formal provision supplemented by additional more natural play integrated into the development outside formal, delineated areas to help integrate activity into the everyday. The Proposed Development's design (at the outline stage) accords with Sport England's Active Design Principles and the play spaces will be informed by a strategy for play, based on Play England's 'Design Principles for Successful Play', submitted post-outline approval. This is a mandatory design element in the Site Wide Design Code.

7.6.54 A Sport and Recreation Strategy (Table 7.1 below) has been prepared by Sports Planning Consultants to identify the minimum on-site sports and recreation facilities required for the masterplan.

7.6.55 The minimum requirements and the proposed facilities within the Illustrative Masterplan are set out below, demonstrating that the proposals go above and beyond the requirements generated from the Proposed Development to allow for the demand from the existing local population to be met, and future needs.

Facility Type	Summary Requirements	Facility Provided in the Illustrative Masterplan	Compliance
Sports Hall	2-court hall to meet demand from the Proposed Development. Potential extension of sports hall to meet identified wider deficiencies and improve functionality for sports where deficiencies have been identified.	4- to 6-court hall	Yes. Delivering over and above the requirement from the Proposed Development to address wider needs.
Swimming Pools	0.33 pools to meet demand from the Proposed Development insufficient to require on site provision. Wider deficiencies in pools (equivalent to 1 pool), land West of Ifield located in area of deficiency On-site pool represents added value and meets identified need.	1 swimming pool	Yes.
Studios	No clear quantitative guidance Studios required in line with population growth.	2 to 3 studios	Yes. Delivering over and above the requirement from the Proposed Development.
Health and Fitness	No clear quantitative requirement – infrastructure can meet additional demand. The Site is in area of deficiency in accessibility terms. Commercial benefits to offering small health and fitness studio.	Small health and fitness studio	Yes. Delivering over and above the requirement from the Proposed Development to address wider needs.
Grass Football	2 adult football pitches, 3 youth football pitches and 2 mini soccer pitches will	2 adult football pitches, 3 youth football pitches and 2 mini soccer pitches.	Yes.

	<p>be generated by the Proposed Development.</p> <p>Wider unmet demand is also evident, but capacity increases to be met through 3G and qualitative improvements.</p>		
3G Artificial Grass Pitches	<p>0.38 artificial grass pitches required by the Proposed Development.</p> <p>Wider deficiency suggest that a 3G pitch on-site would significantly reduce existing widespread deficiencies.</p>	3G artificial grass pitch.	Yes.
Cricket	<p>1.94 cricket pitches required by the Proposed Development.</p> <p>Significant deficiencies in cricket provision in the wider area.</p>	2 grass cricket squares.	Yes.
Tennis	<p>On-site requirement for 2 courts generated by the Proposed Development.</p> <p>Wider deficiencies suggest sustainable hub of 3 courts and 2 padel courts should be provided to meet need.</p>	2 tennis courts and 2 padel courts.	Yes. Delivering over and above the requirement from the Proposed Development to address wider needs.
Sand-based Artificial Grass Pitch	<p>No on-site requirement generated by the Proposed Development.</p> <p>Wider benefits of providing facility from curricular / hockey need.</p>	Sand-based artificial grass pitch	Yes. Delivering over and above the requirement from the Proposed Development to address wider needs.

Table 7.1 Sports and Recreation Strategy

7.6.56 The delivering of the minimum requirements for sports and recreation provision as set out above will be secured via a planning obligation, notably a requirement to submit a phase specific sports strategy which aligns with the space commitments and meets identified local need.

7.6.57 The management and maintenance of the sports facilities will be refined at secured at RMA stage.

Proposed Children's Play Facilities

7.6.58 Areas for children's playground and landscaped areas of play are incorporated into the proposals, as illustrated in the Landscape and Public Realm Parameter Plan and the DAS. Detailed design and phasing will be secured at RMA stage.

Proposed School Facilities

7.6.59 Dual use agreements will be pursued for the sports facilities provided as part of the school provision, allowing community use of these areas, potentially at certain times. This can help ensure maintenance

throughout the lifetime of these facilities, although this must take into account WSCC's requirements and safeguarding obligations.

Proposed Minimum Open Space Commitments

7.6.60 The Proposed Development seeks to deliver a range of high-quality open space typologies across the Site to meet the needs of both future residents, existing local residents and the wider area.

7.6.61 As demonstrated in Table 7.2 below, the Proposed Development commitments to open space exceeds the minimum open space standards set out within HDC's Sport, Open Space and Recreation Study (2021). The Illustrative Masterplan, which has been submitted alongside this application and illustrates one way in which to build out the Parameter Plans and proposed mitigation measures, significantly exceeds the minimum requirements.

7.6.62 The Proposed Development incorporates the following:

Typology and Sub-typology	Area per resident (sqm)	Estimated requirement (based on population of 6,725) in ha	Commitments within HPA (ha)	Provision within Illustrative Masterplan (ha)
TOTAL MINIMUM OPEN SPACE STANDARD	46.6	31.34	A minimum commitment is secured in the Parameter Plans	Accessible space within the HPA identified at this stage as approximately 79ha within the wider 105ha shown on the approval plans and Landscape and Public Realm Parameter Plan
Of which:				
Allotments	1.8	1.21	Commitment to meet standard at RMA	1.3
Multi-Functional Greenspace	Total	43.9	29.52	As below
	<i>Natural & Semi-natural Greenspace</i>	24.3	16.34	Commitment set out in the Parameter Plans
	<i>Amenity greenspace</i>	5.8	3.9	Commitment to meet standard at RMA
	<i>Parks & gardens (includes outdoor sports*)</i>	13.8	9.28	Commitment set out in the Parameter Plans
Children and young people	Total	0.9	0.6	Commitment to meet standard at RMA
	<i>Children (playgrounds / landscaped areas of play)</i>	0.5	0.33	Commitment to meet standard at RMA
	<i>Youth areas and facilities (skate parks / bike tracks / open access ball courts – delivering appropriate provision for all genders)</i>	0.4	0.27	Commitment to meet standard at RMA

Outdoor sports	<i>Grass Pitches and Artificial Pitches</i>	<i>See the Sport England Sport's Playing Pitch Calculator and also the: Council's Playing Pitch Strategy, FA Horsham Local Football Facility Plan, Council's Open Space, Sports and Recreation Review</i>	Commitment to meet standard at RMA	3.14	
	<i>Tennis</i>		Commitment to meet standard at RMA	0.54	
	<i>Bowling</i>		Commitment to meet standard at RMA	-	
Additional Green infrastructure types not included within above categories:			<ul style="list-style-type: none"> 11.2ha: Area identified specifically for nature conservation and management on the Landscape and Public Realm Parameter Plan. 8.23ha: Areas within the Ecology buffers (as identified at the outline stage) on the Landscape and Public Realm Parameter Plan, protected via the Landscape Retention Plan or otherwise considered too small (at the Illustrative stage) to contribute to publicly accessible open space. 6.9ha: Secondary School open space. Public access to this area will be explored through a Community Use Agreement 		
Indoor facilities	Additional built facilities	Area per resident (sqm)	Estimated requirement (based on population of 6,725) in sqm	Commitments within HPA (sqm)	Provision within Illustrative Masterplan (sqm)
	<i>Community Halls or similar</i>	0.055	369.88	<i>Minimum of 600 (excluding health centre)</i>	600
	<i>Indoor Sports facilities</i>	<i>See the Sport England Sports Facility Calculator and also the Council's Built Sport Facility Strategy</i>	N/A	<i>Minimum of 3,400</i>	3,400

Table 7.2 Minimum Open Space Commitments

Summary

7.6.63 Whilst the Proposed Development will result in the loss of the existing Ifield Golf Course facility, the proposals inclusively incorporate and propose to deliver open space, sports and recreation services and facilities to meet the needs of the Proposed Development's population, mitigating and clearly outweighing this loss.

7.6.64 On this basis, the Proposed Development accords with Policy 43 of the HDPF (2015) and national policy on open space and recreation, in particular paragraph 104 of the NPPF (2024).

7.7 Social Infrastructure

Relevant Statutory Development Plan Policy

HDPE (2015)

- Strategic Policy 39 'Infrastructure Provision'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

Horsham District Council's Infrastructure Delivery Plan (2024)

Crawley Borough Council's Infrastructure Delivery Plan (2023)

Planning Policy Assessment

7.7.1 The NPPF (2024) aims to achieve healthy, inclusive and safe places and beautiful buildings, which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.

7.7.2 Strategic Policy 39 of the HDPE (2015) covers the provision and delivery of infrastructure more generally. The Policy states that the release of land for development will be dependent on their being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from more development, or suitable necessary mitigation arrangements for the improvement of the infrastructure, services and community facilities required for use by the development being provided. Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected.

7.7.3 The Proposed Development seeks to promote health and wellbeing and encourage social interaction. Therefore, a number of community and social infrastructure facilities are proposed within the outline parameters. These are set out in turn below.

The Neighbourhood Centre

7.7.4 At the heart of the Proposed Development is the Neighbourhood Centre which plays an important role, serving as the core area that brings together various community facilities, urban living spaces, primary and secondary schools, and the Grove Sports Hub.

7.7.5 The Neighbourhood Centre will comprise a mix of uses to promote social interaction and incorporates street layouts that allow for easy and legible pedestrian and cycle connections within the Neighbourhood Centre and the wider Development. Active frontages will create interest and activity and also add natural surveillance.

Education

7.7.6 The Land Use Parameter Plan illustrates the location of the education uses within Plots NC10 and NC11 in the Neighbourhood Centre Character Area.

7.7.7 The Proposed Development includes up to 11.75ha of land for education provision which includes associated sports fields and ancillary areas for education uses. This total area, provided by WSCC as the Local Education Authority, is based on the combined area for a 3-FE Primary School, including 1x Early Years Nursery and Student Support Centre on a site of 2.4ha and an additional area (minimum of 9.29ha) identified for a potential Secondary School facility of up to 6FE expandable to 8FE, including a sixth form.

7.7.8 The education provision proposed has been informed through extensive discussion with WSCC, and a Statement of Common Ground (dated 20th November 2024) has been signed between the Applicant, WSCC and HDC, which sets out the details of the current and future cooperation, and the joint working relationships of the parties. It has been agreed between the Applicant, WSCC and HDC that the education needs should be based on the blended housing mix specific for the Proposed Development, set out in Chapter 7.3.

7.7.9 Further information on this, including supporting modelling and population projections, is covered in the Infrastructure Delivery Plan (IDP) submitted alongside this HPA.

7.7.10 However, ultimately, both primary and secondary forms of provision exceed the provision required to mitigate the impact of the development and, therefore, will provide additional surplus capacity to address existing capacity issues and also provide for nearby developments who will make financial contributions to the delivery of the education provision.

7.7.11 From discussions with WSCC and the Department for Education, it is clear that there is significant need for the Secondary School to come forward as soon as possible, to meet existing unmet needs.

7.7.12 Indeed, as set out in the IDP, there is one existing secondary school in the Inner Impact Area that is already operating at 98% capacity and four secondary schools in the Outer Impact Area that are also operating at or close to maximum capacity.

7.7.13 This is evidenced in CBC's Infrastructure Plan (May 2023) which states that a site for 6-8 FE secondary school is required to meet existing demand. The Crawley Borough Local Plan (2024) does acknowledge that discussions are ongoing with CBC, WSCC and neighbouring authorities to consider secondary school provision to meet CBC's needs as part of a strategic development close to Crawley. The Proposed Development will assist with meeting this immediate need.

7.7.14 Further to this, WSCC's latest Planning School Places (June 2025) sets out that a new secondary free school (now known as Meadowbrook Secondary) is required in Crawley and this was agreed by the Secretary of State in Education in Spring 2017 to enter the Free School Programme. The Planning School Places (2025) states that the only suitable site is likely to be West of Ifield.

7.7.15 Therefore, timings for the education facilities is a key consideration and the preliminary phasing strategy for the Proposed Development is set out within the DAS. Phase 1 of the Proposed Development relates to the necessary infrastructure associated with the delivery of the Secondary School.

7.7.16 This HPA has been prepared to facilitate a pursuant RMA for the Secondary School. Whilst typically detailed planning permission is often sought through the RMA process, given the requirements for early delivery of the Secondary School to be on-site to meet current unmet need (and be capable of open to serve pupils in the local area for the school year), it is possible that the detailed design of the Secondary School will be sought for approval through a parallel planning process; namely a 'drop-in' full planning application sitting alongside this HPA. This has been considered specifically in the submission of the HPA and is considered in principle to be severable without impacting the ability to build out the remaining areas of the application.

7.7.17 The Applicant worked closely with the Department for Education to ensure the HPA development parameters do not prejudice the design requirements of the school in order to facilitate a full planning application if deemed necessary by the Department for Education.

7.7.18 The education provision and delivery approach will be secured through the Section 106 Agreement.

Health

7.7.19 The Applicant has undertaken regular dialogue with the NHS Integrated Care Board (ICB) over a prolonged period. The ICB have been undertaking a review of primary and secondary health services within the wider area, known as "The Crawley Health Plan". As part of this, the Crawley programme is seeking to focus on the development of neighbourhood teams, streamlining access, and help people to stay healthy, as well as manage the pressures associated with increases in population associated with housing development over the next 15 years.

7.7.20 On this basis, the ICB have identified the need for primary care services as part of the Proposed Development.

7.7.21 Throughout the discussions with the ICB, a series of options were formulated to provide adequate mitigation for the size of the Proposed Development. This included the opening of a new facility to meet the needs of the Proposed Development; a much larger facility to meet more strategic needs; or a payment to reinforce existing provision offsite to improve services provided such that they could cater for the increased need as part of the HPA. The ICB welcome the opportunity to locate within close proximity to other health, community and leisure facilities which can support a healthy lifestyle by residents.

7.7.22 Following engagement, the Proposed Development has been designed with sufficient flexibility to provide a facility on site by allowing for a health facility and committing to a minimum on-site size. The floorspace, in excess of identified demand generated by the Proposed Development, is intended to allow the ICB to have the option to commission a bigger facility than is required simply to meet the healthcare requirements arising from the Development. The nature of this health facility, should it be pursued, is expected to be outlined and delivered in the Neighbourhood Centre or River Valley Character area, as illustrated in the Land Use Parameter Plan with the location, size and form of provision to be determined at RMA stage.

7.7.23 The commitment to provide a primary healthcare facility is set out within the Draft Heads of Terms.

Community

7.7.24 The Applicant support the development of local services and community facilities to meet local needs and to promote social wellbeing, interests, interaction and healthy inclusive communities.

7.7.25 As a result, the HPA has sufficient flexibility to meet these aspirations and beyond, and the applied for floor space could be split into a number of community facilities, depending on their final proposed use and the management arrangement associated with them is appropriate. The intention is that any form of provision should focus on being multi-functional community facilities which serve a variety of community members and uses, potentially including library functions or a wider blue light facility.

7.7.26 As part of the community uses, the Proposed Development seeks to deliver a minimum of 3,400sqm of Class E floorspace to be provided as a Local Leisure Centre and a minimum of 600sqm for Class F2 uses.

7.7.27 Given the above, it is considered that the Proposed Development will result in significant community benefits, and responds to the NPPF's guidance to create integrated, healthy and sustainable communities.

7.7.28 The DAS outlines how the Illustrative Masterplan depicts a Neighbourhood Centre anticipated to provide the greatest concentration of community facilities alongside the traditional retail offer, complemented by associated facilities in the River Valley Character Area.

7.7.29 Drawing on the assessment set out above, the Proposed Development is considered to be compliant with development plan policies and material considerations.

7.7.30 Details of the proposed sports and recreation facilities are set out in Chapter 7.6 of this Planning Statement.

Summary

7.7.31 On this basis, the Proposed Development accords with Policy 39 of the HDPF (2015) and national policy on social infrastructure.

7.8 Transport and Movement

Relevant Statutory Development Plan Policy

HDPE (2015)

- Policy 40 'Sustainable Transport'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

Horsham Transport Study Review (2023)

Horsham Transport Study Addendum – Technical Note (2024)

Horsham District Council's Infrastructure Delivery Plan (2025)

Crawley Transport Strategy: New Directions for Crawley (2020)

Crawley Borough Council's Infrastructure Delivery Plan (2023)

West Sussex Transport Plan 2022 to 2036

Planning Policy Assessment

7.8.1 The NPPF (2024) outlines that transport policies have an important role to play in facilitating sustainable development, but also contributing to wider sustainability and healthy objectives. In considering developments that generate significant amounts of movements, local authorities should seek to ensure they are located where the need to travel will be minimised, and the use of sustainable transport modes can be maximised.

7.8.2 Policy 40 of the HDPE (2015) sets out HDC's commitment to developing an integrated community connected by sustainable transport system, and in order to manage anticipated growth, proposals which promote an improved and integrated transport network will be supported.

7.8.3 In determining planning applications, the NPPF (2024) at paragraph 116 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts on the road network would be severe.

7.8.4 The Proposed Development seeks to deliver the necessary transport infrastructure required for the residential and non-residential uses. Majority of this HPA is applied for in outline, therefore, the Movement and Access Parameter Plan illustrates how the vehicular accesses, public transport corridors and areas for pedestrian and cycle movements are structured within the Site.

7.8.5 However, the detailed proposals include the first phase of the CWMMC as well as the proposed Primary and Secondary Streets that are required ahead of the delivery of the Secondary School. These are applied for in detail and comprise Phase 1 of the Proposed Development.

7.8.6 The CWMMC is a strategic priority and ambition within the WSCC Transport Plan 2022 to 2036 and is set out within HDC's Infrastructure Delivery Plan (2024) demonstrating support to bring forward its delivery.

7.8.7 The first phase (the middle section) of the CWMMC is proposed within this HPA to connect Charlwood Road through to the middle of the Site, with a connection to Rusper Road, and responds to the strong regional, sub-regional and local policy basis for delivering a new strategic transport corridor to the west of Crawley.

7.8.8 The proposed CWMMC focuses on an integrated transport provision offer which supports a shift towards active and sustainable travel, in line with Policy 40 of the HDPF (2015), as well as better placemaking. The CWMMC accounts for bus priority, future proofing for traffic growth and provides connectivity for non-vehicular modes of transport, and is designed appropriately to provide a future relief function if it is extended to the A23 and A264 in the future.

7.8.9 The following principles have been established in relation to the CWMMC:

- Single carriageway with a continuous bus lane in each direction;
- Segregated wide cycleways separate from footways with priority at junctions;
- Segregated footways, minimum 2m and widening in the Neighbourhood Centre; and
- Varying speeds, including 20mph through the Neighbourhood Centre and 30mph elsewhere.

7.8.10 The principles align with the aspirations set out in the Crawley Borough Local Plan (2024) under Policy ST4 which seeks to safeguard a search corridor for the road and promotes a route design which accounts for bus priority, future proofing for traffic growth and connectivity for non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside. Futureproofing has been incorporated within the outline element of the Proposed Development to safeguard land for expansion of the CWMMC.

7.8.11 A Transport Assessment has been prepared by Steer in support of this Application. The Transport Assessment provides the transport strategy which accompanies the Proposed Development and the assessment of associated travel demand. The Applicant has set an ambitious transport strategy that aims to ensure that West of Ifield is sustainable, flexible and inclusive.

7.8.12 Whilst accommodating vehicle ownership and use, the transport strategy seeks to capitalise on changing attitudes and policy towards sustainable transport and draws upon best practice and government guidance to promote active travel and reduce dependency on private cars. It ensures that a range of sustainable transport options are available to all users of the Site by providing suitable infrastructure and support from the outset, where 'good' habits can be established from day one.

7.8.13 The masterplan layout has been designed to prioritise and enable active travel first and public transport. As well as ensuring the physical layout and provision of facilities and encouraging active travel, the Applicant is committed to delivering a package of sustainable transport measures that further encourage non-car based travel.

7.8.14 The Transport Assessment summarises that, in terms of transport, the Proposed Development will deliver a sustainable new community which will maximise the opportunity for people to walk and cycle locally to travel to jobs, to study, to play and shop. The Proposed Development has been designed to enhance connections to Crawley enabling access to Ifield train station and will in turn provide new local employment and facilities to existing residents. The surrounding villages will also benefit from significant investment in cycling and public transport provision and provide opportunities for further investment in such provision.

7.8.15 The Transport Assessment concludes that with the design of the masterplan and the associated Travel Plan measures put in place, beyond some localised potential junction mitigation, the Proposed Development can be supported within the local highway network.

Movements

7.8.16 Given the scale of the Proposed Development, engagement with HDC, CBC and WSCC has been undertaken and the transport modelling has been scoped, refined and agreed as part of the pre-application process.

- 7.8.17 Details on the proposed trip generation are set out within the Transport Assessment, with Chapter 15 of the Environmental Statement outlining the likely transport effects to arise from the demolition and construction and completed development stages of the Proposed Development.
- 7.8.18 The construction effects are considered to be temporary and concentrated during the construction phase of the Proposed Development only. The construction vehicle trip generation assessment indicates that the peak construction years will occur in 2033 to 2035, with a total of 648 one-way and 1,295 two-way trips anticipated to be associated with the construction of the Proposed Development. Of these, 95 are two-way HGV trips. Overall, none of the seven highway links reviewed have been assessed as experiencing a significant adverse residual effect.
- 7.8.19 For the completed development stage, the projected internal and external trip rates and generation per proposed residential and non-residential land use within the Proposed Development has been assessed and further details are set out in the Transport Assessment, prepared by Steer.
- 7.8.20 Overall, it is considered that a number of highway receptors have been assessed to have a significant adverse effect from the Proposed Development. For all of these, highway receptor mitigation packages are proposed to reduce the effects, unless no mitigation is determined necessary by HDC and WSCC.
- 7.8.21 For further details on transport effects, please refer to the Transport Assessment, and Chapter 15 and relevant appendices in the Environmental Statement.

Access

- 7.8.22 Primary access to the Site will be taken from the east via a new signalised junction between Charlwood Road / Bonnets Lane / Ifield Avenue / Ifield Green / CWMMC. Access to the site from the south will only be available to pedestrians, cyclists and buses through the proposed bus gate at the entry to the existing Ifield Golf and Country Club.
- 7.8.23 It is proposed to stop-up Rusper Road where it crosses CWMMC for all vehicular traffic. Pedestrian and cycle access will be maintained in a north/south direction.
- 7.8.24 Stopping-up Rusper Road will allow for the Rusper Road environment to the north / south of this point will be quieter and will be 'access only' to existing premises. This will significantly enhance the cycling facilities to the south, providing a much lower trafficked route towards Ifield Station, for example. In addition, stopping-up Rusper Road will enable the southern part of Rusper Road (between the existing golf course and Hyde Drive) to become a cycle street, with access only for buses, pedestrians and cyclists.
- 7.8.25 For further details, please refer to the Rusper Road Stopping Up Note has been prepared by Steer in support of this HPA to provide a summary of the options considered to date regarding the stopping up of Rusper Road.
- 7.8.26 Pedestrian and cycle connectivity is provided through multiple east-west routes between the Site and the existing network of pedestrian routes.

Public Transport Strategy

- 7.8.27 Travel by public transport is a key element of the transport strategy.
- 7.8.28 The Applicant is committed to delivering a sustainable development, including funding a significant bus service prior to occupation of the first home. This will provide a high frequency bus service to Ifield Station, Crawley, Manor Royal Business District and Gatwick Airport, linking residents of West of Ifield with both employment and onward public transport options by rail / bus interchange. A second bus route, delivered later in the scheme build out, will deliver faster connections to Manor Royal and Gatwick Airport, as well as County Oak retail park. By providing bus links (and cycle links) from mobility hubs within West of Ifield to key facilities and interchanges such as the rail stations at Ifield, Crawley, Three Bridges and Gatwick Airport, there are a range of options available to residents and employees of the Proposed Development to travel by public transport.

- 7.8.29 The bus strategy has been developed in discussions with Metrobus, and input from WSCC and HDC. The strategy comprises two "Fastway" services which will serve the site and provide connections to the wider area.
- 7.8.30 In addition, the draft Heads of Terms sets out a commitment on improving facilities at Ifield Station. Early feasibility work has identified potential to improve waiting facilities, cycle storage opportunities and public realm.

Servicing, Refuse and Fire Tender Access

- 7.8.31 The Proposed Development masterplan layout accommodates servicing, refuse and fire tender access throughout. Further details will be set out at subsequent RMA applications.

Framework Travel Plan

- 7.8.32 The Application is accompanied by a Framework Travel Plan (FTP), prepared by Steer, which identifies initial targets, the suggested approach to the implementation, management, monitoring and review mechanisms for residential and applicable non-residential uses. The overarching aim of the FTP is to influence residents and staff to travel by active modes and public transport wherever possible in order to maximise benefits to public health and minimise the impacts of the Proposed Development.
- 7.8.33 The FTP is intended to be a living document which will be refined and developed to be relevant to and meet the requirements of the future residents and employees.

Off-Site Mitigation Measures

- 7.8.34 In addition to the measures set out in the Framework Travel Plan to support non-car modes, mitigation is proposed to ensure that the Proposed Development is sustainable and the impact on the surrounding neighbourhoods is minimised.
- 7.8.35 Further details are set out in the Transport Assessment and Draft Heads of Terms.

Summary

- 7.8.36 On this basis, the Proposed Development is in accordance with Policy 40 of the HDPF (2015), relevant material considerations, and national policy on sustainable transport.
- 7.8.37 The impacts upon the local highway network have been adequately assessed in the Transport Assessment and suitable mitigation has been identified. WSCC as the Highways Authority has considered the cross-boundary issue related to HDC and CBC, and has agreed that the impacts have been sufficient assessed and the Proposed Development can be provided without any significant impacts that meets the 'severity' threshold set out in the NPPF (2024).
- 7.8.38 The Proposed Development is therefore acceptable in transport and highways terms and in line with paragraph 116 of the NPPF, the development should not be refused on highway grounds.

7.9 Walking and Cycling

Relevant Statutory Development Plan Policy

HDPF (2015)

- Policy 40 'Sustainable Transport'
- Policy 41 'Parking'

The Rusper Neighbourhood Plan (Made June 2021)

- Policy RUS6: Walking, Cycling and Equestrian Routes

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

WSCC's Guidance on Parking at New Developments (2020)

Planning Policy Assessment

7.9.1 The provision of safe walking and cycling facilities is a priority within the Proposed Development.

7.9.2 A full Active Travel England (ATE) audit has been completed by Steer and accompanies this HPA to ensure that the Proposed Development embeds high quality, safe and inclusive active travel infrastructure for all users.

7.9.3 Chapter 8 of the NPPF (2024) promotes healthy and safe communities and requires proposals to design street layouts that allow for easy, legible and clear pedestrian and cycle connections within and between neighbourhoods and active street frontages.

7.9.4 Paragraph 117 of the NPPF (2024) requires proposals to give priority first to pedestrian and cycle movements and second priority to facilitating access to high quality public transport.

7.9.5 Policy 40 of the HDPF (2015) requires proposals to integrate with the wider network of routes, including PRoWs and cycle paths to encourage sustainable transport modes, deliver better local bus and rail services, minimise the distance people need to travel, and minimise conflicts between traffic, cyclists and pedestrians.

7.9.6 The Rusper Neighbourhood Plan also prioritises walking and cycling. Policy RUS6 of the Rusper Neighbourhood Plan (2021) states that proposals will be supported provided that, where appropriate to their location, they have regard to the following principles:

"i. if the proposal adjoins a public footpath or bridleway, the development must have regard to maintaining the functionality and rural character of the footpath or bridleway, unless this cannot satisfactorily be achieved, in which case the route must be diverted in a way that remains safe and convenient for users;

ii. if a proposal lies in a location that enables a new pedestrian, cycle link and/or bridleway to be created to join an existing public footpath or bridleway, that the layout and access arrangements of the scheme allow for such an improvement, provided the development avoids or minimises the loss of mature trees and hedgerows and use materials that are consistent with a rural location; and

iii. access to the Parish by walking, cycling and riding can already be satisfactorily achieved."

7.9.7 A legible and permeable form is proposed that creates vibrant walkable neighbourhoods with clear centres. Following consistent feedback on the importance of limiting car usage, focus was placed on walking, cycling and public transport in the Proposed Development. Accordingly, the movement strategy was refined so that the street network makes it easier to walk and cycle to facilities within Proposed Development and Crawley, discouraging cars users driving within Proposed Development. A network of cycle and pedestrian routes will support active travel and movements throughout, making walking and cycling to key destinations within the Site the most attractive option.

7.9.8 As illustrated by the Movement and Access Parameter Plan, the existing PRoWs are incorporated within the Proposed Development.

7.9.9 As the Site will be removed from agricultural use, access to parkland along the existing network of PRoWs adds a multifunctional aspect to the green space by including opportunity for formal and informal play space through new and existing corridors for different levels of movement through green spaces. Currently, the majority of the site is not permitted for public access outside of the PROWs.

7.9.10 The network includes emphasis on connecting destinations but also about the journeys themselves, with different uses appropriate to the range and type of open space provided. For example, the green infrastructure strategy has also been informed by historic assets on Site, incorporating key heritage trails, notably integrating a new Country Park arrangement into the Proposed Development whilst remaining respectful of advice for the asset to remain in situ.

7.9.11 To encourage active travel, throughout the Proposed Development there will be a mix of varying scale, multi-functional activity spaces which aim to provide a social place for neighbours to come together. They will be within walking distance from work and homes and will deliver a mix of active and productive landscapes.

7.9.12 A full Active Travel England audit has been completed for the Proposed Development to ensure that high quality, safe and inclusive active travel infrastructure for all users is embedded into the design. The audit is included as part of the appendix of the Transport Assessment.

7.9.13 To note, amendments to the existing PRoWs will be required as illustrated within the Public Right of Way Plan and this will be subject to a separate application.

Off-Site Pedestrian/Cycle Link through Ifield Brook Meadows

7.9.14 In addition, a proposed pedestrian / cycle route is proposed outside of the application boundary through Ifield Brook Meadows to connect the Site to Rusper Road.

7.9.15 The proposed off-site pedestrian/cycle link through Ifield Meadows is within CBC's administrative boundary and form part of the off-site mitigation package for the Proposed Development.

7.9.16 Ifield Meadows is within the Applicant's ownership, as shown in the Land Ownership Plan, and therefore its delivery will be secured via a specific Section 106 obligation in association with the HPA.

Cycle Parking

7.9.17 To encourage cycling within and outside of the Site, the Proposed Development seeks to provide cycle parking for both residential and non-residential uses.

7.9.18 The cycle parking standards required by HDC are set out within WSCC's Guidance on Parking at New Developments (dated September 2020).

7.9.19 The minimum cycle parking standards as set out by WSCC will be met through communal and personal, secure, cycle parking provision, with provision for electric bikes within this. The wider ambition to provide a higher provision of one cycle parking space per bedroom will be met either by integrated parking within the individual plots or by the addition of shared storage solutions, either as courtyard cycle parking facilities or

other shared cycle parking solutions, either as courtyard cycle parking facilities or other shared cycle parking solutions.

7.9.20 Cycle parking will also be provided in the public realm, in the Neighbourhood Centre and at transport and mobility hubs. Cycle parking in the public realm will be accessible for different types of cycles and users, and will complement or enhance the surrounding public realm. Long-stay cycle parking for non-residential uses will be located within the floorspace of each non-residential use.

7.9.21 Cycle parking for non-standard cycles will also be provided within the public realm of the site for non-residential land uses in line with local policy and guidance.

7.9.22 Opportunities to safeguard for Ebikes are also being considered within the design of the masterplan.

7.9.23 The level of cycle parking will be determined at RMA stage based on the above minimum requirements.

7.9.24 The minimum residential cycle parking requirements for the Proposed Development will be as follows:

Type	Dwelling Size	Provision Per Unit
House	1-bed and 2-bed	1 space
	3+ bed	2 spaces
Flats	1-bed and 2-bed	0.5 spaces

7.9.25 The minimum non-residential cycle parking requirements for the Proposed Development will be as follows:

Use Class /Type	Staff Spaces	Visitor Spaces
Class E – Commercial, Business and Services – Shops and Retail	1 space per 100sqm	1 space per 100sqm
Class E – Commercial, Business and Services - Business	1 space per 150sqm	1 space per 500sqm
Class E – Assembly and Leisure	1 space per 150sqm	Site specific assessment based on travel plan and needs
Class B2 – General Industrial	1 space per 200sqm	1 space per 500sqm
Class B8 – Storage	1 space per 500sqm	1 space per 1,000sqm
Class F1 – Non-Residential Institutions	Site specific assessment based on travel plan and needs	
Class F2 – Community Hall	1 space per 100sqm	1 space per 100sqm
Class C1 Hotel	1 space per 8 car parking spaces	
Healthcare	1 space per 100sqm	1 space per 500sqm
Creche	1 space per 100sqm	1 space per 250sqm

Summary

7.9.26 On this basis, the Proposed Development accords with Policies 40 and 41 of the HDPF (2015), WSCC's Guidance on Parking for New Development (2020) and national policy on transport modes and cycle parking.

7.10 Car Parking and Electric Vehicle Parking

Relevant Statutory Development Plan Policy

HDPF (2015)

- Policy 41 'Parking'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

WSCC's Guidance on Parking at New Developments (2020)

Planning Policy Assessment

Residential Parking Provision

7.10.1 The Proposed Development seeks to provide an appropriate and sufficient level of car parking for both residential and non-residential uses proposed. HDC's parking standards are set out within WSCC's Guidance on Parking at New Developments (dated September 2020).

7.10.2 Given that this is an OPA, the details of the proposed car parking will be refined at RMA stage. However, it is anticipated that the Proposed Development will incorporate car parking levels that are below WSCC parking standards. These will be linked to specific housing types and are intended to be reduced in a phased manner.

7.10.3 Within WSCC's guidance, there is acceptance that the ratios can be applied flexibly to reflect aspirations for sustainable development. Therefore, in line with transport and movement principles of West of Ifield, a 10% reduction is proposed as the starting point for car parking provision. A 30% reduction is then recommended for subsequent RMAs, which is considered an achievable aspiration to further reduce car dominance, and parking design will provide flexibility to accommodate a further decrease in demand.

7.10.4 The proposed parking provision for the development aims to balance the anticipated demand for parking by future residents whilst implementing reduced levels of car parking in line with the modal shift associated with the proposals, and prioritise walking and cycling. This is considered appropriate as this will link to the delivery of infrastructure and services, to technological change and behavioural change.

7.10.5 The indicative proposed car parking provision for residential and non-residential land uses within the Proposed Development is set out below.

Number of Bedrooms	Number of Habitable Rooms	Parking Requirements – Parking Behaviour Zone 3 (WSCC)	Proposed Car Parking Provision – 10% Reduction	Proposed Car Parking Provision – 30% Reduction
1	1 to 3	0.9	0.8	0.6
2	4	1.3	1.2	0.9
3	5 to 6	1.8	1.6	1.3
4+	7+	2.5	2.3	1.8

7.10.6 Based on the above, the equates to the following parking provision based on the illustrative masterplan housing mix:

Number of Bedrooms	Number of Homes	Proposed Car Parking Spaces – 10% Reduction	Proposed Car Parking Spaces – 30% Reduction
1	450	360	270
2	886	1,062	797
3	1,071	1,714	1,392
4+	593	1,364	1,067
Total	3,000	4,501	3,527

7.10.7 Overall, the provision as a 10% reduction equates to an average of 1.5 spaces per home and the provision as a 30% reduction equates to an average of 1.18 spaces per home. As each RMA comes forward, the parking levels will be determined on a plot-by-plot basis through consideration of the policies at the time, the latest Travel Plan monitoring and any enhancements in technology.

7.10.8 Parking is anticipated to be delivered via a number of parking layouts, including:

- Allocated parking – per home;
- Unallocated parking – generally used by anyone;
- Parking courts and groups parking – can be controlled by design with controlled access or ANPR technology;
- On-street parking – these will be maintained by WSCC.

7.10.9 In addition, the proposed reduction to WSCC parking standards will be supported by a comprehensive car club to reduce the need for car ownership. The Proposed Development seeks to deliver up to 20 car club bays through the Site and this commitment is set out in the draft Heads of Terms.

Non-Residential Parking Provision

7.10.10 WSCC's Guidance on Parking at New Developments (2020) also sets out initial guidance on the quantum of non-residential car parking to be provided by land use, but acknowledges that a site-specific assessment is more appropriate to "balance operational needs, space requirements, efficient use of land and cost attributed to providing parking and where relevant, attracting/retaining staff".

7.10.11 On the basis that a high level of trip internalisation is forecast for the Proposed Development, facilitated by active travel opportunities and the non-residential uses will also be easily accessible to non-West of Ifield residents given its proximity to existing local neighbourhoods.

7.10.12 Given the anticipated build-out period, and expected changes in car ownership over the build period, it is anticipated that the legacy parking rates will be introduced in lien with changes in parking services and demand for parking spaces. The exact dates and triggers will be determined through the monitor and manage monitoring which will be undertaken as part of understanding how vehicular trip rates respond to changes in mode share.

7.10.13 The maximum non-residential car parking requirements for the Proposed Development, based on WSCC's Guidance on Parking at New Developments (2020), will be as follows:

Use Class	WSCC's Vehicular Parking Requirements	Proposed Car Parking Provision - 'Interim'	Proposed Car Parking Provision - 'Legacy'
Class B2 – General Industrial	1 space per 40sqm	1 space per 50sqm	1 space per 60sqm
Class B8 – Storage	1 space per 100sqm	1 space per 130sqm	1 space per 150sqm
Class E – Commercial, Business and Services – Shops and Retail	1 space per 14sqm	1 space per 25sqm	1 space per 40sqm
Class E – Commercial, Business and Services – Business	1 space per 30sqm	1 space per 40sqm	1 space per 50sqm
Class E – Commercial, Business and Services – Assembly and Leisure	1 space per 22sqm	1 space per 25sqm	1 space per 30sqm
Class F1	Site-specific assessment based on travel plan and needs		
Class F2 – Community Hall	1 space per 14sqm	1 space per 35sqm	1 space per 50sqm
Class C1 – Hotel	1 space per bedroom	1 space per 0.9 ratio bedroom	1 space per 0.8 ratio bedroom
Healthcare	1 space per 18sqm	1 space per 30sqm	1 space per 40sqm
Creche	1 space per 18sqm	1 space per 30sqm	1 space per 40sqm

7.10.14 No specific parking standards are currently provided for the Primary School and Secondary School. Site-specific parking standards for staff associated for the school will be determined at RMA stage. No parking will be provided for parents.

7.10.15 Majority of the non-residential parking will be provided as a high proportion of unallocated parking to facilitate future reductions in line with the legacy ratio targets, or via leasehold arrangements for short durations.

7.10.16 Whilst the above provide a useful reference point, further detailed plot testing to ascertain the appropriate level of car parking at specific locations will be carried out at RMA stage, with reference to the development's specific land use, associated trip rates, mode shares and forecast job projections.

Electric Vehicle Parking

7.10.17 In terms of electric vehicle parking standards, WSCC's Guidance requires proposals to provide a minimum of 20% of all parking spaces as 'active' charging points with ducting provided at all remaining spaces where appropriate to provide 'passive' provision.

7.10.18 Whilst electric vehicle charging points will be provided in line with the standards relevant at the time of the RMA application, the current requirements are as follows:

- Every residential home should have access to a charger;
- For non-residential / non mixed use – there will need to be at least one space per building + 20% with passive provision (i.e. cable routing provided);
- Within mixed use areas, it is a combination of both.

7.10.19 It is proposed that fast charging facilities will be provided at strategic locations through the Proposed Development.

Summary

7.10.20 On this basis, the Proposed Development is in accordance with Policy 41 of the HDPF (2015), WSCC's Guidance on Parking at New Developments (2020) and national policy on parking.

7.11 Water Resources and Flooding

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 35 'Climate Change'
- Strategic Policy 38 'Flooding'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

National Planning Practice Guidance (as amended)

Natural England's Position Statement (September 2024)

Horsham Strategic Flood Risk Assessment (2020, update 2024)

Planning Policy Assessment

Flooding

7.11.1 Whilst the vast majority of the West of Ifield Site is within category of Flood Zone 1 (< 0.1% annual chance of flooding), there are areas located in Flood Zone 2 (0.1% annual chance of flooding) and Flood Zone 3 (1% annual chance of flooding) associated with the Ifield Brook, which runs in a northerly direction within the east side of the Site, and the River Mole, which runs through the northern portion of the Site, running in a south-west to north-east direction.

7.11.2 In addition, there is a surface water drain along the northern edge of Rusper Road through the centre of the Site and a network of surface water drains within the golf course in the south. The drains in the golf course are partially open channels and partially culverted. These appear to then be partially culverted beneath property towards the Rusper Road drain.

7.11.3 It has been reported by the public that areas within the golf course in the south of the Site also experience periods of saturation or standing water following heavy rain, due to the clay nature of soils in these areas. Whilst this suggests that some of the existing drains may not have capacity to accommodate extreme rainfall events, there was observed to be flow into the downstream Rusper Road drain such that there is active functioning drainage connectivity. It is noted that surface water ponding within the golf course does not necessarily present a flood risk to the Proposed Development as these drains are to be replaced by new surface water drainage infrastructure; the design of which offers an opportunity to reduce such flood risks.

7.11.4 Strategic Policy 38 of the HDPF (2015) requires development proposals to follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere.

7.11.5 A site-specific Flood Risk Assessment (FRA) has been prepared by Ramboll in support of this application and sets out the baseline such as surface water and groundwater flood risk, historical flooding, drainage infrastructure, foul water infrastructure and surface water infrastructure on the Site. This includes site specific flood modelling, which was scoped and agreed with the Environment Agency.

7.11.6 Whilst areas of fluvial Flood Zones 2 and 3 are present in the Site, and there have been three historical fluvial flooding events in parts of the Site, none of the proposed residential, employment, schools, CWMMC nor playing pitches and allotments are proposed to be in locations affected by fluvial flooding events. Therefore, fluvial flood risk is not considered to affect the majority of the Proposed Development.

7.11.7 The CWMMC would cross the River Mole and as a result, this part of the Proposed Development has been subject to site-specific modelling carried out by Arcadis, which demonstrates that the CWMMC is proposed to be raised sufficiently above the predicted flood levels and Flood Compensation Areas.

7.11.8 Whilst the latest EA flood mapping shows a potential area of flooding related to the Rusper Road drain, crossing the Site from west to east and then to the north, it is considered an erroneous designation and evidence has been provided in the FRA that this potential flood risk is associated with overland pluvial (surface water) flows and not fluvial risk.

7.11.9 When considered appropriately as pluvial flood risk, much of the Site in proximity to the Rusper Road drain presence a change of Very Low to Low surface water flooding.

7.11.10 Based on the findings of the FRA and in consideration of the recommendations made, it is concluded that the change in fluvial flood risk would be appropriately managed by the design of the Proposed Development.

7.11.11 Although the Site was proposed as a draft allocation in the emerging Horsham District Local Plan 2023 – 2040, this has now been recommended for withdrawal by the Inspector. At the point of submission, it is anticipated that the Horsham District Local Plan 2023 – 2040 will be withdrawn before the determination of this HPA. Whilst HDC has stated (see HDC's Inspector's Letter: Frequently Asked Questions (April 2025)) that their view is that the evidence base remains valid, the Strategic Flood Risk Assessment (2020, updated 2024), which was prepared to support the emerging Local Plan, is considered to no longer outweigh the need for a site-specific sequential / exception test at West of Ifield.

7.11.12 On this basis, in line with paragraphs 173 to 179 of the NPPF (2024) and the PPG 'Flood Risk and Coastal Change', the Applicant considers a robust approach is to prepare a site-specific sequential test / exception test. The scope has been agreed with HDC.

7.11.13 The Proposed Development would provide wider sustainability benefits to the community, and the design and mitigation strategy described in the FRA demonstrates that the Proposed Development would be safe for its lifetime and would reduce flood risk overall.

Drainage

7.11.14 Strategic Policy 35 requires developments to be designed so that they can adapt to impacts of climate change, reducing vulnerability, particularly in terms of flood risk, water supply and changes to the District's landscape.

7.11.15 Strategic Policy 38 of the HDPF (2015) requires new development to incorporate measures such as SuDS to help manage flood risk.

7.11.16 A Site-Wide Surface Water Drainage Statement has been prepared by Ramboll in support of this HPA. The site-wide drainage strategy has been developed in accordance with national and local planning policy and concludes the following:

- SuDS techniques such as detention ponds, swales, filter trenches and below ground tanks have been considered viable for the Proposed Development and have been integrated within the proposals.
- The proposed drainage system is capable of managing runoff from all rainfall events up to and including the critical duration of a 1 in 100-year storm event plus 40% allowable for climate change.
- Both foul and surface water drainage strategies discharge via gravity for the majority of the site. Allowances have been made for areas which cannot achieve connection to outfalls via gravity with a provision of a pump station. This is based on the current levels strategy.

- The main on plot drainage will utilise sustainable drainage systems whilst individual plots within the masterplan (residential, commercial and schools) are allocated a specific role in managing their catchment attenuation.
- Surface water collected from vehicular and delivery areas will be treated with a petrol interceptor as appropriate and in accordance with best practice to provide treatment for contaminants to a quality suitable for discharging to a surface water course.

7.11.17 The proposed drainage within Phase 1 of the Proposed Development have been applied for in detail. For further information, please refer to the accompanying drainage drawings (see Appendix A for Drawing Register) and the Phase 1 Surface Water SuDS and Foul Drainage Design Report, which has been prepared by Arcadis.

Water Neutrality

7.11.18 Horsham District lies within the Sussex North Water Resource Zone (WRZ), which is an area of serious water stress.

7.11.19 On 14 September 2021, Natural England published their Position Statement which advised that any new development must not add to the negative impact on wildlife sites in the Arun Valley as a result of water abstraction for drinking water. In short, this means that any new development coming forward must be “water neutral”.

7.11.20 The location of the Site means that it is possible to abstract water from an aquifer (the Upper Tunbridge Wells Sand Formation that is hydraulically and hydrologically disconnected from the Sussex North WRZ. Any water abstracted from on-site borehole(s) and treated will partially or fully reduce the development’s potable demand on the Sussex North WRZ.

7.11.21 A feasibility study has been undertaken to assessment viability of the proposed water neutrality strategy, which was followed by the development of test boreholes and pump testing to confirm the yield and quality of water that may be abstracted from the Upper Tunbridge Wells Sand Formation. Existing water quality data indicate that water abstracted from the borehole(s) will require a certain level of treatment to comply with the wholesomeness requirements of the Private Water Supplies (England) Regulations 2016 (as amended).

7.11.22 A Water Neutrality Statement has been prepared by WSP in support of this HPA to demonstrate how the Proposed Development will achieve water neutrality within the Sussex North WRZ. The approach maximises the use of on-site water resources and aligns with best practice in sustainable development principles and water neutrality.

7.11.23 The proposed water neutrality strategy will offset the entire demand from the Proposed Development. On this basis, the Proposed Development will not increase water abstraction from the Sussex North WRZ, it will achieve water neutrality.

7.11.24 To note, the Kilnwood Vale appeal decision (appeal ref. 3333968) tests the current Water Neutrality position statement, and sets a precedent for securing water neutrality on a residential site within HDC via a pre-occupation condition. Subject to wording, the Applicant agrees in principle to a pre-occupation condition to secure a water neutrality strategy at West of Ifield, in line with the strategies set out in the Water Neutrality Statement.

Water Framework Directive Assessment

7.11.25 A Water Framework Directive Assessment has been undertaken by Ramboll in support of the HPA as there are three Water Framework Directive designated water bodies present on-site that have the potential to be affected by the Proposed Development. The three water bodies include Ifield Brook, Baldhorns Brook and

Mole Upstream of Horley.

7.11.26 The Water Framework Directive Assessment concludes that with the implementation of design measures, such as inclusion of SuDS, in addition to environmental management during construction, the Proposed Development would not have any adverse impact on the surface water bodies within and adjacent to the Site.

Summary

7.11.27 On this basis, the Proposed Development is in accordance with Strategic Policies 35 and 38 of the HDPF (2015), national policy on flood risk and drainage, and Natural England's Position Statement (September 2024).

7.12 Landscape Visual Impact and Townscape

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 25 'The Natural Environment and Landscape Character'

The Rusper Neighbourhood Plan (Made June 2021)

- Policy RUS3: Design

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

Horsham District Landscape Character Assessment (2003)

Horsham District Landscape Capacity Assessment (2021)

Planning Policy Assessment

7.12.1 Chapter 15 of the NPPF (2024) seeks to protect and enhance valued landscapes. At paragraph 135, the NPPF (2024) states that developments should ensure that they are sympathetic to the local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

7.12.2 HDC seeks to maintain and where appropriate enhance the beauty and amenity of both the natural and built-up areas of the District. Strategic Policy 25 of the HDPF (2015) states that the Council will support development proposals which protects, conserves and enhances the landscape and townscape character, and maintains and enhances the green infrastructure network and the existing network of geological sites and biodiversity.

7.12.3 Policy RUS3 of the Rusper Neighbourhood Plan states that proposals should satisfactorily take into account the retention of key views out to the countryside.

7.12.4 The Site is located within the low lying land adjoining Ifield Brook Wood and Meadows with built development beyond, at the west of Ifield. The edge of Ifield is characterised by a high coverage of trees and woodland which restricts clear views out from the built-up area. However, in some locations along PRoWs or country lanes, the Site can be seen above the tree rural foreground.

7.12.5 Chapter 11 of the Environmental Statement provides an assessment of the likely significant effects of the Proposed Development on landscape as an environmental resource and on people's views. The scope and methodology has been reviewed by HDC and Natural England during the preparation of the Environmental Statement.

7.12.6 36 viewpoints have been identified and used within the assessment, which were selected in consultation with HDC. The viewpoints selected do not intend to illustrate every possible location from where there might be a view of the Proposed Development, but rather present a selection of representative, specific and illustrative views about the Proposed Development's likely landscape and visual effects.

7.12.7 During demolition and construction works, it is anticipated that there would be significant adverse effects on the character of the landscape within the Site. In many cases, this would be temporary, although there would be some longer term effects from construction activities, such as vegetation removal. It is concluded that due to the retention of many of the existing trees and hedgerow, the effects on the individual landscape would not be significant. In terms of the views, it is anticipated that there would be significant adverse effects experienced by receptors both within and close to the Site, including those living along

Rusper Road. There would not, however, be a significant effect on views from Ifield Village Conservation Area, Ifield Green Recreation Ground, Ifield Brook Wood and Meadows and the build-up area of Ifield to the east of the site. Again, the vegetation retained within the Site will heavily filter views.

- 7.12.8 In short, it is considered that the demolition and construction works would result in some significant effects for landscape and visual, however, the effects are contained to the immediate Site and receptors in close proximity.
- 7.12.9 During the completed development stage, there would be significant adverse effects on the landscape within the Site, although due to the retention of many of the existing trees and hedgerows, and the retention of 50% of the Site as open space, the effects on individual landscape elements within the Site is considered to be not significant. Over time, with the maturing of the landscape proposals, the level of adverse effect would reduce slightly. At completion, there would be significant adverse effects on the views experienced by receptors, in particular those along Rusper Road, Lower Barn and the properties within the Maple development. Again, over time and the maturing of the proposed landscaping, the adverse effect would reduce. There would not, however, be a significant effect on views from Ifield Village Conservation Area, Ifield Green Recreation Ground, Ifield Brook Wood and Meadows and the built up area of Ifield.
- 7.12.10 In short, it is considered that the completed Proposed Development would result in some significant effects for landscape and visuals. However, these effects are constrained to receptors within and immediately adjacent the Site and for a Proposed Development of this scale are limited.
- 7.12.11 Indeed, the existing settlement boundaries set out in the HDPF (2015) need to be considered in the context that the adopted housing policies are out-of-date. This is set by an Inspector in the recent appeal decision ref 3355546 at Horsham Golf Club who considered the impact on landscaping to be outweighed by the need for homes in HDC.
- 7.12.12 To note the presence of the noise bund will subtly change the landform adjacent to the CWMMC, however, planting is proposed to soften its appearance. Further details of the noise bund are set out in the Design and Access Statement.
- 7.12.13 For further details on effects on landscape visual impact and townscape, please refer to Chapter 11 and relevant appendices of the Environmental Statement.

Summary

- 7.12.14 On this basis, the Proposed Development is in accordance with Strategic Policy 25 of the HDPF (2015), Policy RUS5 of the Rusper Neighbourhood Plan, and national policy on landscape and visual impact.

7.13 Heritage and Historic Environment

Relevant Statutory Development Plan Policy

HDPL (2015)

- Policy 34 'Cultural and Heritage Assets'

Relevant Material Planning Considerations

National Planning Policy Framework (2024)

Ifield Village Conservation Area Statement (2018)

Planning Policy Assessment

7.13.1 There are no designated heritage assets within the Site. However, there are a number of designated heritage assets located outside of the Site, including Ifield Village Conservation Area, the Scheduled Medieval moated site at Ifield Court, the Scheduled moated site at Ewhurst Place, Grade I Listed Parish Church of St Margaret and Grade II Listed Old Pound Cottage. Further details of the designated heritage assets and their significance located within 1km of the site are set out in Appendix 10.1 of the Environmental Statement.

7.13.2 Section 16 of the NPPF (2024) seeks to conserve and enhance the historic environment. Paragraph 212 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

7.13.3 Policy 34 of the HDPL (2015) requires development to sustain and enhance the historic environment, including preserving building forms and their settings, securing viable and sustainable future for heritage assets through continued preservation, and retaining and improving the setting of heritage assets. In addition Policy 34 requires proposals to ensure appropriate archaeological research, investigation, recording and reporting.

7.13.4 Chapter 10 of the Environmental Statement outlines the likely cultural heritage effects to arise from the demolition, construction and completed development stages of the Proposed Development. The scope and methodology has been reviewed by HDC and Historic England during the preparation of the Environmental Statement.

7.13.5 As part of the preparation of Chapter 10, a Statement of Significance and Impact Assessment (Appendix 10.4 of the Environmental Statement) has been undertaken. In particular, the Medieval moated site at Ifield Court was identified as having a high heritage significance and it is considered that the effects of construction and operation of the CWMMC (which at its closest point would be 15m from the Scheduled Monument), would reduce the extent of the monument's rural isolation and introduce a new source of noise. As a result, it is considered that the Proposed Development would have a moderate effect on the heritage asset. In addition, the Grade I Parish Church of St Margaret is also considered to have high heritage significance and, whilst located over 135m from the boundary of the Proposed Development, the Site would be visible. Therefore, it is considered that the construction and operation of the Proposed Development would change the wider setting of the Parish Church of St Margaret. This change, however, is not viewed as detrimental to the significance of the heritage asset and viewing corridors within the Site have preserved views of the Church from PRoWs.

7.13.6 Chapter 10 of the ES concludes that the Proposed Development will result in a moderate adverse impact on the heritage significance of the identified sensitive receptors during demolition and construction stage, which is considered as a significant effect. On completion, on the basis that no further groundworks are anticipated, there would be no further direct impacts on heritage assets within the Proposed Development.

- 7.13.7 It should be noted that the Proposed Development does include embedded mitigation in the form of design and landscape planting to promote a visual sense of openness. In addition, the proposal to replace Ifield Medieval Park with natural and semi-natural green space featuring mature tree planting and species-diverse grassland would have an ameliorating effect over time on the impact to the asset's setting stemming from the construction and demolition stage.
- 7.13.8 For further details on effects on cultural heritage, please refer to Chapter 10 and relevant appendices of the Environmental Statement.

Summary

- 7.13.9 On this basis, the Proposed Development accords with Policy 34 of the HDPP (2015), Ifield Village Conservation Area Statement (2018) and national policy on heritage.

7.14 Ecology, Trees, Landscaping and Biodiversity

Relevant Statutory Development Plan Policy

HDPF (2015)

- Policy 31 'Green Infrastructure and Biodiversity'

The Rusper Neighbourhood Plan (Made June 2021)

- Policy RUS5 'Green Infrastructure and Biodiversity'

Relevant Material Planning considerations

National Planning Policy Framework (2024)

Horsham Nature Recovery Network Report (2021)

HDC's Green Infrastructure Strategy and Guide (2024)

Planning Policy Assessment

Ecology and Habitats

7.14.1 The ecologically sensitive areas of the Site within the application boundary have largely been conserved and will be enhanced through careful management (please refer to Chapter 8 Appendices of the Environmental Statement for further details). In the order of 60% of the Proposed Development area will be dedicated to the enhancement and improvement for wildlife and biodiversity.

7.14.2 Chapter 8 of the Environmental Statement outlines the likely biodiversity effects to arise from the demolition and construction and the completed development stages of the Proposed Development. The scope and methodology has been reviewed by HDC, Natural England and the Environment Agency during the preparation of the Environmental Statement.

7.14.3 A significant number of ecological surveys have been undertaken and are ongoing by qualified specialists by desk-top and field surveys to establish the baseline condition over a number of years. Further details of the surveys undertaken are set out in Chapter 8.

7.14.4 The ecological surveys have informed the design process, ensuring some mitigation, such as avoidance of sensitive areas or retention of habitats has been included in the overall scheme design. In most cases the inclusion of further mitigation measures (notably through a Construction and Environmental Management Plan) is considered sufficient to reduce the significance of the impacts to a minor or negligible effect.

7.14.5 During demolition and construction works, it is considered the effects on biodiversity are likely to arise as a result of loss of habitat, construction traffic movement, disturbance and pollution, which would result in a major effect on habitats. It is considered this stage will result in a minor effect up to local level for some bats, including Bechstein's bats. Overall, it is considered that the demolition of the existing buildings and construction of the Proposed Development would result in an adverse, but not significant, effect on biodiversity and identified receptors, but would give rise to short-term significant effects on biodiversity, due to the loss of the veteran tree (discussed further below with regards to Paragraph 193 of the NPPF (2024)).

7.14.6 Following completion of the development, effects on biodiversity are likely to arise as a result of increased disturbance and visitor pressure, loss of habitat connectivity, and road traffic accidents. This would result in minor effects for some bats and negligible effects for all other ecological receptors, including Bechstein's bats. This is the same for both detailed design component and outline design elements. Overall, it is considered that the completed Proposed Development would result in a beneficial effect on habitats on-site due to the landscape-led proposals and a biodiversity net gain in habitats can be made.

7.14.7 For further details on effects on biodiversity, please refer to Chapter 8 and relevant appendices of the Environmental Statement.

7.14.8 Paragraph 195 of the NPPF (2024) states that the presumption in favour of sustainable development does not apply where the proposals is likely to have a significant effect on a habitat site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

7.14.9 A number of designated National Site Network sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) and Ramsar sites are located within the Zone of Influence of the Proposed Development. As such, the HPA is supported by a Stage 1 Screening Habitats Regulation Assessment, prepared by Ramboll, and a Shadow Habitats Regulation Assessment, prepared by WSP.

7.14.10 The following sites are reviewed to assess the implications from the Proposed Development:

- Mole Gap to Reigate Escarpment SAC
- The Mens SAC
- Ebernoe Common SAC
- Arun Valley SAC
- Arun Valley Ramsar Site
- Arun Valley SPA

7.14.11 The implications of the Proposed Development on these designated sites have been considered due to their proximity to the Site, the potential existence of effect pathways between them, and through consultation with Natural England.

7.14.12 The Stage 1 HRA (Screening) considers it unlikely the Proposed Development would result in significant adverse effects on the Mole Gape to Reigate Escarpment SAC, The Mens SAC and Eberone Common SAC and their qualifying features. Therefore, additional assessment or mitigation for these designated sites is not required. However, likely significant effects at Arun Valley SAC, SPA and Ramsar Site cannot be ruled out at the Screening assessment stage, and it is therefore recommended that an Appropriate Assessment is undertaken.

7.14.13 The Appropriate Assessment needs to be completed and provided by HDC and agreed with Natural England. To assist HDC, a Shadow Stage 2 HRA (Appropriate Assessment) has been prepared by WSP to assist HDC in determining whether the proposals, either alone or in combination with other projects or plans, will result in any adverse effects on the integrity of the site as defined by the conservation objectives and status of the site.

7.14.14 The Shadow Stage 2 HRA concludes that when enacted as a package, the proposed measures set out within the Water Neutrality Statement (see Chapter 7.11) will ensure that the water demand from the Proposed Development will be reduced to zero and, as such, no adverse effects on the integrity of the Arun Valley SAC, SPA and Ramsar site resulting from water abstraction are anticipated.

Trees and Landscaping

7.14.15 National and local planning policy seek to protect existing trees and landscaping. Paragraph 136 of the NPPF (2024) highlights that trees make an important contribution to the character and quality of urban environments. Policy 31 of the HDPF (2015) states that proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.

7.14.16 There are a total of 502 individual trees as well as tree groups, hedgerows and woodlands across the Site, the vast majority of which will be retained, as identified in the Landscape Retention Plan. However, some of the existing trees will be lost as a result of the Proposed Development, including a veteran tree.

7.14.17 An Arboricultural Impact Assessment has been prepared by Tim Moya Associates in support of this planning application. The AIA has assessed the proposed impacts of the Proposed Development on a worst-case scenario basis and has identified that the removal of 71 individual trees, 43 tree groups, 30 woodland areas and 17 hedgerows will or may be required.

7.14.18 To note, the outline element of the Proposed Development includes Parameter Plans which have been designed to allow flexibility during the detailed design stage. This means that the road corridors that have been allowed for within the Parameter Plans through the Site are, in many cases, potentially wider than they will actually be and as such, the tree loss detailed should be understood as being a worst case scenario with the actual tree loss to be detailed in RMAs. The emphasis at the RMA stage will be to retain trees where possible and feasible.

7.14.19 Future RMAs will identify the trees that are required to be removed to facilitate development on that plot / phase, and an appropriate RMA specific mitigation package will be prepared and approved with HDC. The mitigation package could include necessary tree protection and no-dig areas, pruning works, additional planting.

7.14.20 There are a total of 4 veteran trees located within the Site.

7.14.21 Paragraph 193 of the NPPF (2024) states that development resulting in the loss of deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and then separately a suitable compensation strategy exists.

7.14.22 The retention of the veteran trees was a significant consideration in the alignment of the CWMCC, however, the loss of one veteran tree is unavoidable to facilitate the construction of the CWMCC (see T368 in the Arboricultural Impact Assessment). In some of the alternative design options, an additional number of veteran trees would be impacted and therefore the lowest impact scenario (i.e. the loss of one veteran tree) has been progressed.

7.14.23 The DAS Chapter 8 sets out a consideration of the reasonable alternative arrangements for the CWMCC which would meet the same project objectives as that embedded in the proposed development. This demonstrates that there was no alternative design which would avoid the loss of this veteran tree.

7.14.24 In order to mitigate this specific loss, the following suitable package is proposed, to be captured by a combination of detailed drawing and associated management control:

- Extensive tree and woodland planting, including those of the same species as the lost veteran tree, is proposed within proximity of the location of T368 which can be managed to become veteran trees in the future;
- Newly created planting to mimic the conditions provide by the veteran trees to support the species were reliant upon the tree;
- Creation of vertical 'stacks' of the veteran tree and relocated within the Site to decompose naturally and add invertebrate habitat;
- Collection of seeds and cuttings from the veteran tree to propagate new trees would ensure their genetic legacy continues; and
- Screening barriers to protect existing veteran trees from dust and pollution during construction of the Proposed Development.

7.14.25 This is considered within the submission document to be a suitable compensation strategy, in line with the PPG (Paragraph: 034 Reference ID: 8-034-20190721). Given the strategic nature of the scheme and the public benefits, it is considered that wholly exceptional reasons exist which justify the loss of this veteran tree and which clearly outweigh the loss of this habitat.

7.14.26 Furthermore, a wider landscaping strategy is proposed within the Proposed Development. Detailed designs are provided for Phase 1 and will be secured by condition. Details for the outline element of the Proposed Development will be secured at RMA stage.

7.14.27 Policy 31 of the HDPF (2015) states that proposals will be supported which make a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological network.

7.14.28 The existing mature landscape is the Site's greatest asset, providing the opportunity to create a development with its own unique character, where masterplanning and space creation can be guided by valuable existing ecological and cultural features.

7.14.29 Soft landscaping is a key element of the Phase 1 development to deliver sustainable and enjoyable public realm, as well as soften the appearance of the noise bund to the north of the CWMMC to integrate this feature into the wider landscape. Plants have been selected to enhance biodiversity, provide shade, improve air quality, and create settings that propose healthy and wellbeing. Trees have been strategically placed along the CWMMC and Primary and Secondary Streets to soften the road infrastructure and future buildings, as well as add greenery and colour to the hard surface landscape.

7.14.30 For the outline element of the proposals, the Landscape and Public Realm Parameter sets out the proposed landscaping and open space typologies to be secured in subsequent RMAs, including natural and semi-natural open space, neighbourhood parks and gardens, allotments and food growing spaces, amenity open space, play provision and outdoor sports provision.

7.14.31 High quality landscaping will be incorporated into the Proposed Development for ecological, visual and amenity functions which provide a transition from the edge of the development to the rural countryside and sensitive ecological features.

7.14.32 Three Neighbourhood Parks are proposed in strategic locations across the Site, providing recreational uses and facilities to all residents. The character of each park is unique, providing a focal point for the neighbourhood, and is based on the existing landscape character and features of each area.

7.14.33 The Site's mature landscape features and character will be complemented and enhanced by new planting in all landscaped spaces. This new planting will bring nature into all areas of the Proposed Development, ensuring that urban space are green and biodiverse.

7.14.34 Planting will also play an important role in the Proposed Development as part of the SuDS network. Native species, sympathetic to the local character will be prioritised. The proposed planting schedule will be sympathetic to the existing species profile of the area whilst seeking to enhance diversity to provide resilience to climate changes, pests and diseases. Where replacement trees are planted, they will be of the appropriate species to contribute to an overall Masterplan which aims to limit the visual impact on the local landscape.

7.14.35 In order to restrict public access within the Hyde Hill Woods, a strip of "thorny" planting will be proposed within the overall buffer to prevent increased recreational pressure on the woodland as part of the mitigation strategy for bats (and specifically maternity colonies of Bechstein's using Hyde Hill Woods).

7.14.36 In addition, the Site Wide Design Code includes principles specifically for horticulture, ecology and trees which will provide a framework to guide the development of detailed schemes and aid the determination of the future RMAs. The retained landscape features and new planting will create a framework for the provision of enhanced biodiversity, plan for climate change and biosecurity and future management and maintenance.

Nature Recovery Network

7.14.37 The Proposed Development seeks to deliver strategically connected network of open space to create an interconnected landscape and series of habitats to allow species to move freely from place to place. These wildlife corridors will aim to connect to Wilder Horsham District's Nature Recovery Network, which enriches the natural environment for the District. Further details are set out in the Chapter 6 of the DAS and Chapter 3 of the Site Wide Design Code.

Biodiversity Net Gain

7.14.38 Strategic Policy 25 of the HDPF (2015) supports proposals will ensure no net loss of wider biodiversity and provides net gains in biodiversity where possible.

7.14.39 The Environment Act 2021 requires a minimum of 10% biodiversity net gain for development proposals. In line with this requirement, the Proposed Development seeks to deliver a minimum of 10% net gain in biodiversity within the Site.

7.14.40 The Biodiversity Net Gain Assessment Report has been prepared by Ramboll in support of this planning application, using the Statutory Biodiversity Metric of July 2024 and an outlines a strategy for achieving this.

7.14.41 According to the Biodiversity Net Gain Assessment Report, the assessment has found that it is possible to deliver a minimum of 10% net gain in biodiversity site-wide for area-based habitats, 10% net gain in hedgerows and 10% net gain in watercourses.

7.14.42 Further details on the delivery of the biodiversity net gain will be set out at RMA stage.

Landscape Management

7.14.43 In addition, it is anticipated that a Landscape Environmental Management Plan will be required and will cover all areas of green infrastructure with regular reviews of usage alongside specifications for the management of habitats and new planting and will provide operational mitigation measures.

7.14.44 To ensure new residents are aware of the ecological importance of areas of green space both within and beyond the Proposed Development, information packs will be supplied to new occupiers to provide background information on nearby designated Sites, describing areas of ecological interest within the Site and provide guidelines about the use of these areas. This document will be informed by the principles in the Environmental Statement Main Report and will need to be read in conjunction with the biodiversity mitigation proposed.

7.14.45 Please also see the Management and Maintenance Chapter of this Planning Statement, where this is covered in more detail.

Summary

7.14.46 On this basis, the Proposed Development is in accordance with Strategic Policy 25 and Policy 31 of the HDPF (2015), Policy RUS5 of the Rusper Neighbourhood Plan (2021) and national policy on ecology, biodiversity and landscaping.

7.15 Environmental Protection (Air Quality, Noise/Vibration, Lighting, Land Contamination, and Soils and Agricultural Land)

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 24 'Environmental Protection'

The Rusper Neighbourhood Plan (Made June 2021)

- Policy RUS10 'Dark Skies'

The West Sussex Joint Minerals Local Plan (July 2018) (Partial Review March 2021)

- Policy Mg 'Safeguarding Minerals'

Relevant Material Planning considerations

National Planning Policy Framework (2024)

Air Quality and Emissions Mitigation Guidance for Sussex (2021)

West Sussex Breathing Better: Air Quality Plan (2020)

Noise Policy Statement for England (2010)

Planning Noise Advice Document: Sussex (2023)

Planning Policy Assessment

7.15.1 Chapter 15 of the NPPF (2024) states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.

7.15.2 The HDPF (2015) seeks to maintain, and where necessary improve, the quality of the environment in the District. Strategic Policy 24 states that development will be expected to minimise exposure to and the emissions of pollutants including noise, odour, air and light pollution.

7.15.3 In addition to Strategic Policy 24 of the HDPF (2015), Policy RUS10 of the Rusper Neighbourhood Plan (2021) requires all development to be designed to minimise the occurrence of light pollution, and energy efficient forms of lighting should be incorporated into proposals that reduce light scatter and comply with current guidelines.

7.15.4 The Proposed Development seeks to mitigate any adverse impact on the environment in line with national and local planning policy. Further details are set out within the Environmental Statement and are summarised below.

Air Quality

7.15.5 The Site is not located within an Air Quality Management Area. However, the Proposed Development will result in an increase in road traffic during construction and operation, and an increase in dust during the construction stage, and such will result in an increase in air pollution.

7.15.6 Chapter 7 of the Environmental Statement outlines the likely air quality effects to arise from the demolition and construction and the completed development stages of the Proposed Development. The scope and methodology has been reviewed by HDC, CBC and Gatwick Airport Limited during the preparation of the Environmental Statement.

- 7.15.7 Chapter 7 identifies that the Site is located in an area with numerous sensitive receptors, including members of the public and ecological receptors.
- 7.15.8 During demolition and construction works, there is the potential that emissions of dust arising from the Site could result in a loss of amenity due to dust deposition, and human health impacts due to increased particulate matter concentrations at nearby properties, as well as on-Site occupants of completed phases. With the implementation of suitable mitigation measures set out within the Phase 1 Outline Construction Management Plan, prepared by Arcadis, and the Outline Construction and Environmental Management Plan, prepared by Ramboll, both of which accompany this HPA, it is anticipated that the dust impacts would be appropriately mitigated. The proposals to minimise dust emissions is in accordance with the Institute of Air Quality Management guidance.
- 7.15.9 During the completed development stage, concentrations of air pollution has been predicted for a number of worst-case locations where existing properties are located. However, the predicted concentrations would be well below the relevant National Air Quality Objectives at all of the existing human health receptor locations and therefore, air pollution effects from the anticipated road traffic is expected to not be significant.
- 7.15.10 An Air Quality Emissions Mitigation Statement has been prepared by Ramboll and accompanies this HPA. The Emissions Mitigation Statement presents the findings of the calculated air quality damage costs from the Proposed Development. It concludes that given the scale of active travel mode measures proposed (set out the Draft Heads of Terms), it is anticipated that the total costs for transport-related measures will vastly exceed the emissions and damages costs. If for any reason, under a mechanism outlined in the Section 106 agreement, the eligible mitigation measures did not exceed the calculated damage costs then the Applicant would be required to pay the balance of these costs.
- 7.15.11 For further details on effects on biodiversity, please refer to Chapter 7 and relevant appendices of the Environmental Statement.

Noise/Vibration

- 7.15.12 The existing baseline noise conditions at the Site are characterised by road and air traffic noise, given its located near to London Gatwick Airport.
- 7.15.13 The Proposed Development will result in an increase in road traffic during the construction and operation (including the CWMMC), and, given its mixed-use nature, increase the sensitive receptors (new homes and education provision) located on the Site.
- 7.15.14 Noise barriers and bunds have been embedded into the design of the Proposed Development specifically regarding the CWMMC. The requirement for a noise bund and the design of the noise bund has been discussed with HDC during pre-application stage. A 3.5m grass bund (with a gap) is proposed to mitigate the north of the CWMMC to reduce the noise impact on the area. In order to be in keeping with the country park character, the grass bund flows into the existing landscape to minimise visual impact and to maintain the open character of this particular area. Groups of trees, scattered single trees and small woodland parcels are proposed on and around the bund, creating filtered views of the bund and road from sensitive receptors in the area.
- 7.15.15 Further details and the design evolution of the proposed bund are set out in the DAS, which accompanies this HPA.
- 7.15.16 Chapter 12 of the Environmental Statement outlines the likely noise and vibration effects to arise from the demolition and construction and the completed development stages of the Proposed Development. The scope and methodology has been reviewed by HDC, CBC and London Gatwick Airport and Gatwick Airport Limited during the preparation of the Environmental Statement.
- 7.15.17 Noise prediction modelling has been completed to account for the future predicted road traffic noise levels with the completed development and cumulative schemes in place. Road traffic noise has been assessed

alongside the potential future aircraft noise contours associated with the proposed second southern runway at Gatwick Airport, which is pending determination, as a worse case basis.

- 7.15.18 During demolition and construction works, there is the potential for temporary adverse effects on vibration, however these are unlikely to be significant due to the expected duration and if prior notice is given to receptors that are likely to be affected. Implementing appropriate mitigation measures at RMA stage will reduce the temporary vibration effects. In addition, it is considered that demolition and construction traffic is not expected to give rise to significant effects at any receptor location.
- 7.15.19 In order to assess noise and vibration effects at the completed development stage, a site suitability assessment has been undertaken for permanent residential uses, Gypsy and Traveller pitches and non-residential uses.
- 7.15.20 As a result, noise contours have been a key consideration in the masterplan layout, including the locations of more sensitive receptors such as Gypsy and Traveller pitches and dwellings. These are considered in the Environmental Statement in more detail.
- 7.15.21 As set out in Chapter 3.2.2 of the Site Wide Design Code, residential dwellings and private gardens would not be placed within the Site areas that sit within the 60 dB(A) Leq,16hour contour that is applicable at the time of the reserved matters planning application.
- 7.15.22 Changes in road traffic noise levels are not expected to result in significant adverse effects at any receptor in the short term and long term.
- 7.15.23 For further details on effects on noise and vibration, please refer to Chapter 12 and relevant appendices of the Environmental Statement.

Lighting

- 7.15.24 The Proposed Development will require lighting during construction and operation to ensure safety, security and wayfinding.
- 7.15.25 A Lighting Impact Assessment has been prepared by DFL-UK in support of this HPA. The Lighting Impact Assessment has undertaken an external lighting strategy which proposes good practice and outlines a guidance approach to apply to the lighting design of the Proposed Development. It has been utilised for the detailed design of Phase 1 and will be used for the outline element in subsequent RMAs. The strategy outlines a minimally obtrusive approach to lighting to ensure sensitively to both the local environment and human receptors.
- 7.15.26 Potential effects resulting from artificial lighting during construction can be mitigated through a range of design and control measures, including the use of shields and hoods on luminaires, appropriate timing of working hours and operation of security lighting, as well as consideration of the orientation of luminaires, and the avoidance of 'over-lighting'. The Lighting Impact Assessment concludes that following the implementation of mitigation measures proposed, the residual effects are assessed to be minor adverse (as worst case), and the level of lighting is not likely to be obtrusive in nature.
- 7.15.27 Full details of the external Lighting Strategy for Demolition and Construction have been set out in the Phase 1 Outline Construction Environmental Management Plan and the Outline Construction Environmental Management Plan.
- 7.15.28 In short, any adverse impacts of lighting can be avoided by detailed development control. Due to the outline nature of the Development the lighting assessment is qualitative at this stage and no preliminary lighting design information has been prepared to be submitted with the HPA. However, further lighting design details will be conditioned to any planning permission and submitted as part of future RMA.
- 7.15.29 Careful consideration will be given to the height and type of street, amenity including sports and building lighting and the hours of usage to reduce night-time effects. Planting should be used to help filter the

lighting, reducing its visual impact in the wider landscape. Within the wider Landscape strategy, the types of lighting used will be directed by the Site Wide Design Code and more comprehensive lighting is likely to be associated with providing the minimum level of lighting to complete activities safely, prevent crime, and to meet highway safety standards.

Land Contamination

7.15.30 The Phase 1 Ground Condition Assessment has been prepared by Ramboll to identify the existing ground conditions and environmental setting of the Site and to assess how these may influence the opportunities, and present constraints, to future development.

7.15.31 The Phase 1 Ground Condition Assessment confirms that the Site is currently occupied by predominantly agricultural land, and has remained mostly unchanged since 1920, with the surrounding area utilised for predominantly residential and agricultural purposes. In terms of contaminant linkages, it is confirmed that there is a moderate to low risk of contamination from the Site's current use as agricultural land and golf course. The potential off-Site contamination relating to the off-Site agricultural uses may also be capable of affecting adjacent areas of the Proposed Development, however, the Assessment does not expect the concentrations of contaminants (if present) to pose a significant risk.

7.15.32 The Phase 1 Ground Condition Assessment concludes that the identified potential sources of contamination appear to be relatively limited in extent and would be relatively manageable. However, it is likely that additional work will be required which can be undertaken as part of RMA stage.

Minerals Resource

7.15.33 The Site is located within the Weald Clay Formation Minerals Consultation Area. The Site does not fall within an area which encroaches on an existing mineral development.

7.15.34 Policy M9 of the Minerals and Waste Local Plan (2018, revised 2021) seeks to safeguard existing mineral resources through the identification of mineral safeguarding areas. Development that would prevent or otherwise hinder the possible future working of the mineral would not normally be permitted unless it can be shown that the site (such as this one) has been included within the plan making process.

7.15.35 A Minerals Resource Assessment has been prepared by Ramboll in support of this planning application, following engagement with WSCC. The Minerals Resource Assessment identifies the presence of Weald Clay Formation at the Site along with some areas of overlying superficial deposits near the rivers and streams on and within the vicinity of the Site.

7.15.36 The Minerals Resource Assessment concludes that it will not be feasible to extract the Clay on site given the size and location of the Site, the excessive costs associated, the cost of geotechnical mitigation, the ecological / hydrological impacts on Site and nearby sensitive receptors, and the potential increase in bird hazard risk at Gatwick Airport.

Soils and Agricultural land

7.15.37 Paragraph 187 of the NPPF (2024) seeks to protect and enhance valued landscapes, sites of biodiversity or geological value and soils (in the manner commensurate with their statutory status or identified quality in the development plan).

7.15.38 Approximately 90ha of the total area of the Site is ALC Subgrade 3b (medium sensitivity) and the remainder is non-agricultural land (low sensitivity). This is outside of the NPPF (2024) definition of best and most versatile (BMV) land.

7.15.39 Chapter 6 of the Environmental Statement outlines the likely significant effects to arise from the demolition and construction and the completed Proposed Development on soil and agricultural land

quality. The scope and methodology has been reviewed by HDC and Natural England during the preparation of the Environmental Statement.

- 7.15.40 During demolition and construction, the quality and quantity of soil resources would be identified as part of a Soil Management Plan and a detailed Construction and Environmental Management Plan, which will be secured as part of RMA stage. By protecting soil resources in this way, the significance of the effects of the Proposed Development on soil resources would be negligible – minor. However, there is the potential to permanently change the land use of approximately 40.2ha of Subgrade 3b agricultural land from agricultural production to a platform for built development, and as such, it is considered the Proposed Development would give rise to significant adverse effects on agriculture.
- 7.15.41 It is considered there are no significant additional effects on soil and agriculture once the Proposed Development is constructed.
- 7.15.42 For further details on the effects on soil and agriculture, please refer to Chapter 6 and relevant appendices in the Environmental Statement.
- 7.15.43 Whilst the Environmental Statement considers a significant adverse effect on agriculture, this is based on the scale of development proposed and the quantum of land required, rather than the impact on specific resources or the quality of the soil. The Site does not comprise BMV agricultural land and as such will not result in the loss in the highest quality of agricultural land. Instead, the Proposed Development seeks the loss of areas of poorer quality land. It is considered that the benefits of the proposal, including the provision of housing in HDC in the context of undersupply, outweigh harm caused.

Summary

- 7.15.44 On this basis, the Proposed Development accords with Strategic Policy 24 of the HDPP (2015), Policy RUS10 of the Ruster Neighbourhood Plan (2021), the West Sussex Joint Minerals Local Plan and national policy on environmental protection, including air quality, noise/vibration, light pollution, minerals and soils.

7.16 Sustainability and Energy

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 35 'Climate Change'
- Strategic Policy 36 'Appropriate Energy Use'
- Policy 37 'Sustainable Construction'

Relevant Material Planning considerations

National Planning Policy Framework (2024)

Planning Policy Assessment

7.16.1 Paragraph 157 of the NPPF (2024) states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts and should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

7.16.2 Strategic Policy 35 of the HDPF (2015) states that development will be supported where it makes a clear contribution to mitigating and adapting to the impacts of climate change and to meeting the District's carbon reduction targets. Strategic Policy 36 of the HDPF (2015) requires all development to contribute to clean, efficient energy in compliance with the energy hierarchy.

7.16.3 The Proposed Development has been designed with sustainability in mind..

7.16.4 In line with adopted policy, this HPA is supported by an Energy Strategy, prepared by Ramboll, which demonstrate that a number of scenarios have been examined for potential low carbon energy resources and technology.

7.16.5 In line with the policy requirements set out in Strategic Policy 36, the Site is not located in a Heat Priority Area nor is it a strategic development location, which are defined in Strategic Policy 2 of the HDPF (2015) as North of Horsham Town, West of Southwater, South of Billingshurst, and the former Novartis site. Therefore, it is understood that the Proposed Development is not expected to connect to district heating networks.

7.16.6 The three scenarios considered within the Energy Strategy are as follows:

- Scenario 1: Direct electric heating and on-site solar PV to deliver 10% of buildings' electricity demand;
- Scenario 2: Individual ASHPs on property level, with on-site solar PV to deliver 10% of buildings' energy demand;
- Scenario 3: Individual ASHPs on building level with communal heating for flats, with on-site solar PV to deliver 10% of buildings' energy demand.

7.16.7 The choice of scenario will be refined at a later stage once the design has been developed. On the basis that the Proposed Development will be delivered over a number of years, with initial occupation of the Secondary School targeted in 2028 and the occupation of first homes in 2029, no preferred solution has been chosen at this stage.

7.16.8 However, at the point of submission, the Proposed Development commits to a minimum of equivalence to the Future Homes Standards, to ensure homes are “zero carbon ready”, above the standards set out in the current Building Regulations. BREEAM accreditation will be sought for the non-residential uses.

7.16.9 A more detailed feasibility of the scenarios will be undertaken to determine the preferred solution. Therefore, subject to wording, the Applicant agrees to the principle of a prior to occupation condition requiring the submission of a site-wide energy strategy.

7.16.10 Policy 37 of the HDPP (2015) states that proposals must seek to improve the sustainability of development and incorporate sustainable design measures which are appropriate to the type of development and location.

7.16.11 In terms of water usage, the Proposed Development with Policy 37 and limit water use to a maximum of 110 litres per person per day.

7.16.12 The Sustainability Statement, prepared by Third Revolution Projects, has undertaken a third part review of the Proposed Development to assess the credentials and improve design.

7.16.13 Sustainability and responsible design have been a consistent thread through the evolution of the HPA and a suite of appropriate design responses from the strategic level down to the plot and building fabric have been included in the proposals. The HPA will seek to influence individual behaviour and choices made to encourage sustainability.

7.16.14 Seven sustainability themes have been developed in discussions with HDC to suit the characteristics of the Proposed Development and are as follows:

- A “15-minute community” where most needs are no more than a short walk or bike ride from home;
- A rich mix of housing typologies, low carbon and flexibility to adapt;
- A highly accessible place in which walking and cycling are the norm, where mobility is inclusive, sustainable transport priorities, and there is no need to own a car;
- The development will deliver a low carbon and future-proofed Energy Strategy;
- A smart place strategy with high-capacity telecoms to facilitate low carbon energy and transport, a 15-minute community, and economic growth;
- Build climate resilience and support health and wellbeing through multifunctional landscapes and infrastructure;
- The economic strategy should respond to the rapidly changing local, national and global context and deliver benefits to the wider local economy.

7.16.15 The Sustainability Statement provides further details on the criteria and objectives of the sustainability themes and assesses the Proposed Development against such criteria. Overall, the proposals demonstrate a high-level of performance across the sustainability themes and deliver strongly against local planning policy. The design will be further refined at RMA stage where the proposals will continually seek to score well against the seven sustainability themes.

7.16.16 As outlined in the previous chapters of this Planning Statement, evidence of a climate change sensitive approach is clear in the transport strategy; how water and flood risk is managed; how biodiversity is retained and enhanced through the wider green infrastructure strategy; the outline energy strategy; and down to the provision and co-location of key facilities (notably community facilities, retail, education, residential and employment) at West of Ifield.

7.16.17 Indeed, at this stage, the Applicant is committed to the minimum Future Homes Standards to ensure homes are “zero carbon ready”, above the standards set out in the current Building Regulations.

Summary

7.16.18 On this basis, the Proposed Development accords with Strategic Policies 35, 36 and Policy 37 of the HDPP (2015) and national policy on energy and sustainability.

7.17 Utilities

Relevant Statutory Development Plan Policy

HDPF (2015)

- Strategic Policy 39 'Infrastructure Provision'

Relevant Material Planning considerations

National Planning Policy Framework (2024)

Planning Policy Assessment

7.17.1 Chapter 10 of the NPPF supports high quality communications, stating that advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing.

7.17.2 Strategic Policy 39 of the HDPF (2015) states that the release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development, or suitable necessary mitigation arrangements for the improvement of infrastructure, services and community facilities caused by development being provided.

7.17.3 In support of this HPA, a Utilities Statement has been prepared by Ramboll to provide a high-level review of the existing utility apparatus which may be affected due to the Proposed Development. The Utilities Statement has identified that at this stage, there are no Major Transmission apparatus that will be affected by the Proposed Development, however there is distribution apparatus which will be affected, including electricity (UKPN). The Utilities Statement also noted that there is no existing telecoms apparatus within the site, and no gas, sewers or potable water apparatus will be directly affected by the Proposed Development.

7.17.4 The Proposed Development will deliver the necessary infrastructure required for the large-scale residential-led development. The Utilities Statement sets out a number of proposed utilities required and confirms that new points of connection requests have been submitted to statutory providers. Further details on the proposed utilities for the Proposed Development and points of connection will be refined at RMA stage.

7.17.5 To note, waste water treatment will be managed through the existing network utilising the Crawley Waste Water Treatment Works (WwTW). The Applicant has undertaken early and continued engagement with Thames Water to ensure that proposed scheme forms part of their long term modelling and included within their long term Asset Management Plans so that the necessary upgrades can be delivered alongside other development within the catchment area. As part of this process, the Applicant has ensured that a robust assessment of future demand has been captured which has included a sensitivity around overall development capacity, phasing and not making and allowance for any reductions resulting from achieving water neutrality across the scheme. Discussions with Thames Water has confirmed sufficient capacity within the Crawley WwTW and identified a number of capacity improvements to the strategic foul water network to meet future demand from Ifield and other development from across north Horsham and Crawley area. Where upgrades are required within the vicinity of the scheme, sufficient space has been protected within the layout to ensure upgrades can be delivered in a timely manner.

Summary

7.17.6 On this basis, the Proposed Development complies with Strategic Policy 39 of the HDPF (2015) and national policy on utilities and infrastructure.

7.18 Management and Maintenance Approach

Relevant Material Planning considerations

National Planning Policy Framework (2024)

Planning Policy Assessment

7.18.1 The Applicant is committed to making sure the assets at Land West of Ifield are maintained and managed in perpetuity for the future benefit of the community.

7.18.2 The stewardship of key assets is key to realising new community aspirations and is a key part of the development plan and local aspirations raised during consultation. The Town and Country Planning Association outline that "*the stewardship task goes beyond the management of green space to cover the broadest range of community assets, including the active and positive management of everything from arts provision to commercial estates and utility companies. Putting local people at the heart of this process can generate increased local support, creativity, and entrepreneurialism*".

7.18.3 The Applicant has developed an initial vision that will underpin the long-term stewardship arrangements for West of Ifield. The vision proposes a holistic approach, focusing on both the need to manage and maintain a range of community assets that will be delivered on-site, alongside a community development role. The purpose of the latter is to create a positive and inclusive place for both new and existing residents. The vision also highlights the aspiration for the long-term stewardship arrangements to be financially viable, this is essential to enable the long-term stewardship activities to be implemented successfully and in perpetuity.

7.18.4 Suitable arrangements will clearly vary from place to place and project to project and will depend on the final function of the stewardship body, the assets that they want to and are able to manage, and the types of finance and legal arrangements needed to ensure their provision. Given the complexities, options and collective 'buy-in' demanded, it is critical that design details are further explored and understood before stewardship arrangements are fixed and it is clear that stewardship is an ongoing process, remaining key during detailed design considerations following the initial permission and as the Development grows.

7.18.5 As a response at the outline stage, the Applicant has reviewed a number of options of appropriate governance arrangements. To guide the successful implementation of long-term stewardship, a number of objectives have been identified, including:

1. Financially robust and sustainable from the outset, utilising a mix of capital and revenue funding streams. The governance arrangements will seek to ensure financial arrangements are equitable in perpetuity;
2. Resident-facing structure will creates a positive 'lived experience' by being simple to understand and facilitating engagement to highlight and address issues and opportunities for improvements.
3. Management and provision, for present and future generations, of a range of assets and facilities for community uses and activities.
4. Robust structure and framework that ensures stakeholders with an interest in long-term stewardship at the West of Ifield can proportionately be involved in the establishment and future operation.
5. Effective immediately (or has an initial interim status) but is flexible to respond to future within the scheme.
6. Support placekeeping and placemaking.

7.18.6 There are various approaches to long-term stewardship. The appropriateness of these for the West of Ifield scheme will depend on the proposed uses, as well as the definition and guiding principles that underpin the long-term stewardship arrangements.

7.18.7 It is anticipated that the establishment of a site-specific model will form an important part of the long-term stewardship proposals for the West of Ifield scheme. However, this will be confirmed as the design progresses. It is likely that the following land uses will be considered appropriate to form part of a community-led stewardship arrangement:

- Open space, sports provision and recreation (e.g. County park, allotments, play areas, sports facilities and playing pitches) – a range of organisations, including district or parish councils, management companies, stakeholder with an interest in long-term stewardship, or a bespoke long-term stewardship vehicle;
- Community centre and uses (e.g. Public Square and the Local Leisure Centre) – a range of organisations including district or parish councils; stakeholder with an interest in long-term stewardship or a bespoke long-term stewardship vehicle;
- Shared spaces, including highways – a range of organisations depending on whether the assets are adopted.

7.18.8 The current OPA has set out the overall amount and types of development proposed and the broad/key locations. More detailed plans will be brought forward at the RMA stage which will set out the nature of the buildings, roads, and open spaces. In producing those plans, the Developer will continue to engage with stakeholders and the local community to understand the views and perceptions of both current and future potential residents.

7.18.9 It is anticipated that detail on the preferred long-term stewardship approach(es) will be secured through the Section 106 Agreement. This will fix the agreed management structure and the financial support provided by the Applicant. Input from local and national stakeholders is feeding into this process to ensure that the preferred approach(es) are robust and implementable.

8. Planning Assessment Summary and Conclusions

- 8.1.1 This Planning Statement, together with the full suite of supporting application documents submitted in support of the HPA, demonstrates a robust case in favour of the Proposed Development when assessed against the development plan as a whole.
- 8.1.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals for new development to be determined in accordance with the development plan unless material consideration indicates otherwise. This Planning Statement confirms that the Proposed Development complies with the aims and objectives of relevant planning policy and is acceptable having regard to other material planning considerations.
- 8.1.3 This HPA seeks to meet the acute need for housing within HDC and, as demonstrated throughout this Planning Statement and the supporting documents, there are significant and lasting social, health and economic benefits as a result of the scale of housing and employment to be delivered.
- 8.1.4 The Applicant has sought to enable early delivery of infrastructure, through the preparation of a hybrid planning application, which seeks full planning permission for the initial development phase of the CWMMC, with the remainder of the site in outline.
- 8.1.5 The design approach is the result of extensive community and stakeholder engagement which has guided principles and the details being applied for across all elements of the application. The HPA enables social infrastructure and complementary land uses, notably schools, to ensure that it becomes a desirable, vibrant, diverse and inclusive place to live and work that encourages community interactions and the creation of community.
- 8.1.6 A key consideration in the determination of this HPA is that HDC is currently unable to demonstrate a five year housing land supply. As a result, the presumption in favour of residential sustainable development is as set out in Paragraph 11(d) of the NPPF (2024) is engaged.
- 8.1.7 Furthermore, the HPA is submitted with a full suite of both technical drawings and reports for the detailed element (Phase 1) of the Proposed Development, parameter plans and documents (some of which are site-wide) for the outline element of the Proposed Development, and an Environmental Statement, which has comprehensively identified and assessed the likely effects arising from the demolition and construction stage and operational stage of the Proposed Development.
- 8.1.8 As evidenced through this Planning Statement and accompanying submission documents, the Proposed Development delivers the following significant public benefits:
 - Up to 3,000 new homes delivering much needed housing (including family housing) in the district where only one year of housing supply can currently be identified;
 - Policy compliant affordable housing which will make a significant contribution to the district and will assist in creating a mixed and balanced community;
 - A Primary School (with Early Years facilities) and Secondary School (including Sixth Form) providing school places which will exceed the demand generated from the Proposed Development and address existing unmet need ;

- Significant amount of high-quality open space, delivering rich and diverse open space typologies benefiting both existing and local residents, visitors and biodiversity (including a minimum 10% biodiversity net gain on Site);
- Employment opportunities during the construction (circa 1,369 jobs) and operation (circa 1,352 FTE jobs) of the Proposed Development, including flexible Class E, Class B2 and B8 floorspace available in a location with strategic links to Manor Royal Business District and Gatwick Airport;
- Supporting social infrastructure, including sports and recreation, health and community facilities, a Local Leisure facility, and a mixed-use Neighbourhood Centre to meet the day-to-day needs of the community;
- A package of transport measures, including LCWIPs and improvements to Ifield station, which will enable behavioural change and the use of modes other than the private car as does the approach to car parking provision over time; and
- Early delivery of Phase 1 of the CWMMC and safeguarding for future extension.

8.1.9 All remaining matters of detailed design and layout for the outline element of the Proposed Development will be further determined at RMA stage. The Parameter Plans, informed and supported by significant evidence base, establish controls for the structural elements of West of Ifield. This includes which parts of the Site would be appropriate for different land uses, where green infrastructure will be located and what the maximum building heights can be in certain areas.

8.1.10 The control of the design of the development is mandated through the Site Wide Design Code which will ensure the appropriate level of control for RMAs including sustainable building standards and infrastructure design. The proposals, supported by an Illustrative Masterplan which outlines how the Development could come forward within those parameters, appropriately respond to the ambitions of the emerging Local Plan.

8.1.11 Indeed, whilst limited, if any, weight will be applied to the emerging Horsham District Local Plan 2023 – 2040 for the determination of this HPA, the evidence base (prepared and submitted by HDC) and the draft site allocation Policy HA2 demonstrates HDC's aspiration for the Site to come forward and were of the view that draft Policy HA2 was 'sound' when the Local Plan was submitted for Examination.

8.1.12 The draft policy has been used as a design driver for this HPA. The Proposed Development seeks to deliver the necessary infrastructure, services and facilities to facilitate the delivery of up to 3,000 new homes within HDC. The HPA is submitted with a comprehensive, landscape-led masterplan, a Site Wide Design Code and Phasing Strategy demonstrating the Applicants commitment to delivering a sustainable development.

8.1.13 In light of HDC's current position of being unable to demonstrate a five year housing land supply, it is considered that very substantial weight should be given to the delivery of up to 3,000 new homes, including at least 1,050 affordable homes.

8.1.14 This Planning Statement has demonstrated that the Proposed Development will deliver substantial benefits and has been assessed against the relevant extant planning policies. In light of this, it is respectfully requested that hybrid planning permission be granted without delay, subject to agreeing a package of measures to be secured through a Section 106 Agreement alongside appropriate planning conditions.

Appendix A: Drawing Register

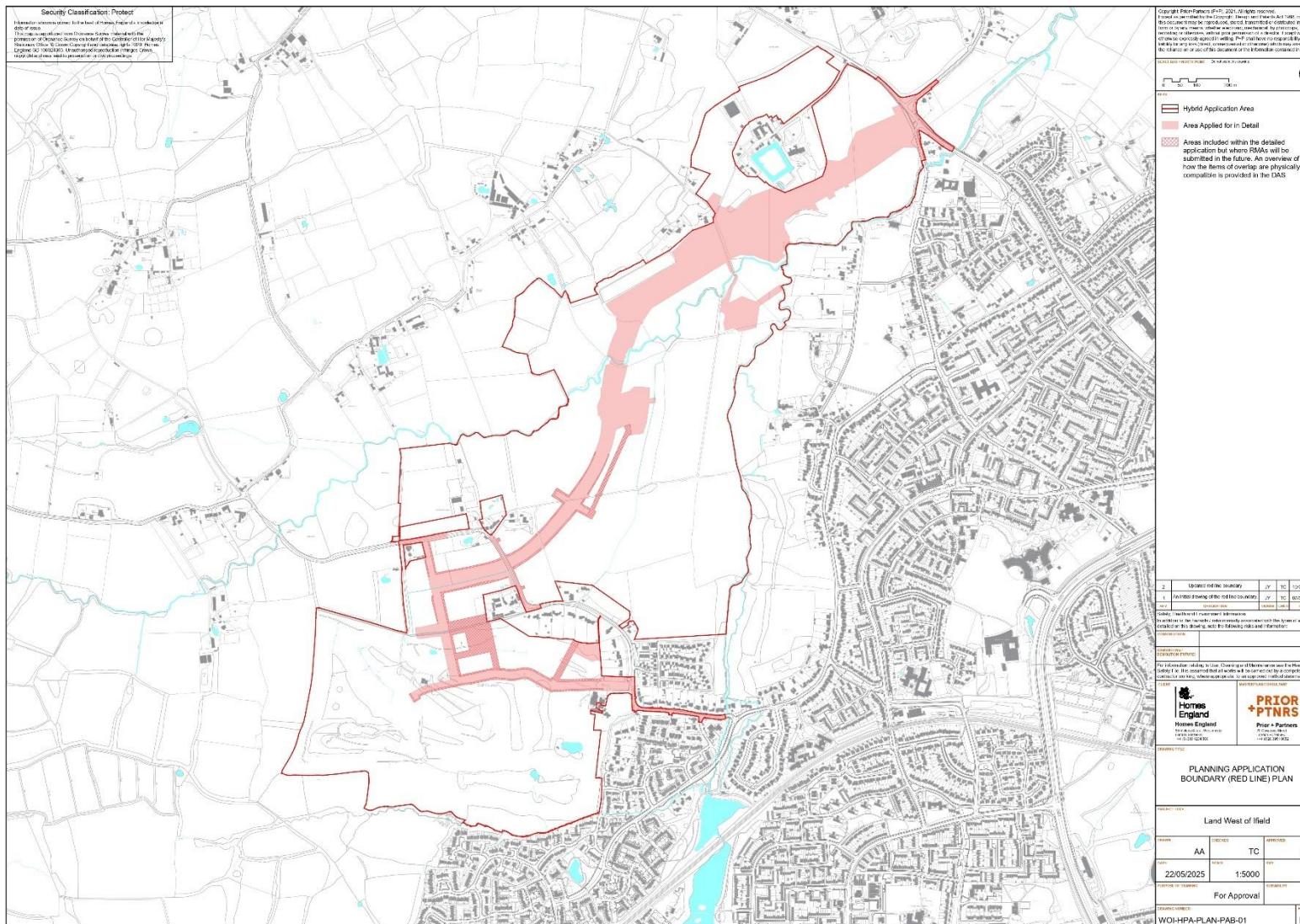
The following list of drawings have been submitted for the detailed element and the outline element.

Element of the Application	Drawing Title	Drawing Reference
Hybrid	Site Location Plan	WOI-HPA-PLAN-LOC-01
	Landownership (Blue Line) Plan	WOI-HPA-PLAN-BLU-01
	Planning Application Boundary	WOI-HPA-PLAN-PAB-01
	Building Demolition / Retention Plan	WOI-HPA-PLAN-DEM-01
	Landscape Retention Plan	WOI-HPA-PLAN-LRP-01
	Public Right of Way Amendment Plan	WOI-HPA-PLAN-PROW-01
	Existing Levels Plan	WOI-HPA-PLAN-LEV-01
	Illustrative Masterplan	WOI-HPA-PLAN-IM-01
Detailed	Phase 1A Drainage Layout Overview	10051123-ARC-050-1A-DR-CE-00001
	Phase 1A Detention Basin 1 General Arrangement	10051123-ARC-050-1A-DR-DE-00005
	Phase 1A Detention Basin 1 Cross Sections	10051123-ARC-050-1A-DR-DE-00006
	Phase 1A Drainage Layout Sheet 3	10051123-ARC-050-1A-DR-DE-00013
	Phase 1A Drainage Layout Sheet 4	10051123-ARC-050-1A-DR-DE-00014
	Phase 1A Drainage Layout Sheet 6	10051123-ARC-050-1A-DR-DE-00016
	Phase 1A Drainage Layout Sheet 7	10051123-ARC-050-1A-DR-DE-00017
	Phase 1A Drainage Layout Sheet 8	10051123-ARC-050-1A-DR-DE-00018
	Phase 1A Foul Water Drainage Overview	10051123-ARC-050-1A-DR-DE-00030
	Phase 1A Foul Water Drainage Sheet 1	10051123-ARC-050-1A-DR-DE-00031
	Phase 1A Foul Water Drainage Sheet 2	10051123-ARC-050-1A-DR-DE-00032
	Phase 1A Foul Water Drainage Sheet 3	10051123-ARC-050-1A-DR-DE-00033
	Phase 1A Foul Water Drainage Sheet 4	10051123-ARC-050-1A-DR-DE-00034
	Phase 1A Foul Water Drainage Sheet 5	10051123-ARC-050-1A-DR-DE-00035
	Phase 1A Proposed Utilities	10051123-ARC-051-1A-DR-CE-00001
	Phase 1A General Arrangement Overview	10051123-ARC-070-1A-DR-CE-00001
	Phase 1A General Arrangement Sheet 3	10051123-ARC-070-1A-DR-CE-00004
	Phase 1A General Arrangement Sheet 6	10051123-ARC-070-1A-DR-CE-00007

	Phase 1A General Arrangement Sheet 7	10051123-ARC-070-1A-DR-CE-00008
	Phase 1A General Arrangement Sheet 8	10051123-ARC-070-1A-DR-CE-00009
	Phase 1A Overall Vehicle Tracking Layout	10051123-ARC-070-1A-DR-CE-00017
	Phase 1A Vehicle Tracking Paths Sheet 1	10051123-ARC-070-1A-DR-CE-00018
	Phase 1A Vehicle Tracking Paths Sheet 2	10051123-ARC-070-1A-DR-CE-00019
	Phase 1A Carriageway Long Sections Sheet 1	10051123-ARC-071-1A-DR-CE-00001
	Phase 1A Carriageway Long Sections Sheet 2	10051123-ARC-071-1A-DR-CE-00002
	Phase 1A Carriageway Long Sections Sheet 3	10051123-ARC-071-1A-DR-CE-00003
	Phase 1A Carriageway Long Sections Sheet 4	10051123-ARC-071-1A-DR-CE-00004
	Phase 1A Highway Typical Cross Sections Sheet 1	10051123-ARC-072-1A-DR-CE-00001
	Phase 1A Highway Typical Cross Sections Sheet 2	10051123-ARC-072-1A-DR-CE-00002
	Phase 1A Typical Urban Rain Garden Section	10051123-ARC-072-1A-DS-CE-00001
	Phase 1A Landscape Typologies Plan Sheet 1	10051123-ARC-300-1A-DR-LA-00001
	Phase 1B General Arrangement Sheet 1	10051123-ARC-010-1B-DR-HE-00001
	Phase 1B General Arrangement Sheet 2	10051123-ARC-010-1B-DR-HE-00002
	Phase 1B General Arrangement Sheet 3	10051123-ARC-010-1B-DR-HE-00003
	Phase 1B General Arrangement Sheet 4	10051123-ARC-010-1B-DR-HE-00004
	Phase 1B General Arrangement Sheet 5	10051123-ARC-010-1B-DR-HE-00005
	Phase 1B General Arrangement Sheet 6	10051123-ARC-010-1B-DR-HE-00006
	Phase 1B General Arrangement Sheet 7	10051123-ARC-010-1B-DR-HE-00007
	Phase 1B Flood Compensation Area	10051123-ARC-010-1B-DR-HE-00008
	Phase 1B Surface Water Drainage Strategy Sheet 1	10051123-ARC-050-1B-DR-DE-00001
	Phase 1B Surface Water Drainage Strategy Sheet 2	10051123-ARC-050-1B-DR-DE-00002
	Phase 1B Surface Water Drainage Strategy Sheet 3	10051123-ARC-050-1B-DR-DE-00003
	Phase 1B Surface Water Drainage Strategy Sheet 4	10051123-ARC-050-1B-DR-DE-00004
	Phase 1B Proposed SUDS Cross Sections Sheet 1	10051123-ARC-050-1B-DR-DE-00005
	Phase 1B Detention Basin 1 General Arrangement	10051123-ARC-050-1B-DR-DE-00006
	Phase 1B Detention Basin 1 Cross Sections	10051123-ARC-050-1B-DR-DE-00007
	Phase 1B Detention Basin 2 General Arrangement	10051123-ARC-050-1B-DR-DE-00008
	Phase 1B Detention Basin 2 Cross Sections	10051123-ARC-050-1B-DR-DE-00009

	Phase 1B Detention Basin 3 & 4 General Arrangement	10051123-ARC-050-1B-DR-DE-00016
	Phase 1B Detention Basin 3 Cross Sections	10051123-ARC-050-1B-DR-DE-00017
	Phase 1B Detention Basin 4 Cross Sections	10051123-ARC-050-1B-DR-DE-00018
	Phase 1B Highway Long Section Sheet 1	10051123-ARC-071-1B-DR-HE-00001
	Phase 1B Highway Long Section Sheet 2	10051123-ARC-071-1B-DR-HE-00002
	Phase 1B Highway Long Section Sheet 3	10051123-ARC-071-1B-DR-HE-00003
	Phase 1B Highway Long Section Sheet 4	10051123-ARC-071-1B-DR-HE-00004
	Phase 1B Highway Long Section Sheet 5	10051123-ARC-071-1B-DR-HE-00005
	Phase 1B Highway Long Section Sheet 6	10051123-ARC-071-1B-DR-HE-00006
	Phase 1B Typical Cross Section 1	10051123-ARC-072-1B-DR-HE-00201
	Phase 1B Typical Cross Section 2	10051123-ARC-072-1B-DR-HE-00202
	Phase 1B River Mole Overbridge GA 1	10051123-ARC-160-1B-DR-SE-00001
	Phase 1B River Mole Overbridge GA 2	10051123-ARC-160-1B-DR-SE-00002
	Phase 1B Landscape Typologies Plan 1	10051123-ARC-300-1B-DR-LA-00001
	Phase 1B Landscape Typologies Plan 2	10051123-ARC-300-1B-DR-LA-00002
	Phase 1B Highway Swept Path Analysis Sheet 1 of 8	10051123-ARC-070-1B-DR-HE-00011
	Phase 1B Highway Swept Path Analysis Sheet 2 of 8	10051123-ARC-070-1B-DR-HE-00012
	Phase 1B Highway Swept Path Analysis Sheet 3 of 8	10051123-ARC-070-1B-DR-HE-00013
	Phase 1B Highway Swept Path Analysis Sheet 4 of 8	10051123-ARC-070-1B-DR-HE-00014
	Phase 1B Highway Swept Path Analysis Sheet 5 of 8	10051123-ARC-070-1B-DR-HE-00015
	Phase 1B Highway Swept Path Analysis Sheet 6 of 8	10051123-ARC-070-1B-DR-HE-00016
	Phase 1B Highway Swept Path Analysis Sheet 7 of 8	10051123-ARC-070-1B-DR-HE-00017
	Phase 1B Highway Swept Path Analysis Sheet 8 of 8	10051123-ARC-070-1B-DR-HE-00018
	Phase 1A Additional Key	10051123-ARC-XXX-1A-DR-CE-00002
	Phase 1B Highway Key Plan and Legend	10051123-ARC-XXX-1B-DR-HE-00001
	Phase 1 Temporary Access and Compound Areas	10051123-ARC-260-ZZ-DR-HE-00003
Outline	Landscape and Public Realm Parameter Plan	WOI-HPA-PLAN-PP01-01
	Movement and Access Parameter Plan	WOI-HPA-PLAN-PP02-01
	Land Use Parameter Plan	WOI-HPA-PLAN-PP03-01
	Building Heights Parameter Plan	WOI-HPA-PLAN-PP04-01

Appendix B: Red Line Boundary



Appendix C: Land Use Table

The Land Use table represents the total land uses which can come forward as part of future RMAs and phases of the HPA.

Proposed uses				Acceptable in the following Character Areas:			
Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace (GEA) enforced as part of S106 (where relevant)	Neighbourhood Centre	River Valley	The Meadows	Hillside and Woodland
Commercial							
Class E - Commercial, Business and Service	Up to 40,130 sqm	E(a) Display or retail sale of goods, other than hot food	A maximum of 5,200 can be provided for Class E(a) uses	Yes	Yes	No	No
		E(b) Sale of food and drink for consumption (mostly) on the premises		Yes	Yes	No	No
		E(c) Provision of: (i) Financial services, (ii) Professional services (other than health or medical services), or (iii) Other appropriate services in a commercial, business or service locality		Yes	Yes	No	No
		Class E(d) - indoor sport, recreation or fitness	Minimum of 3,400 sqm provided as a Local Leisure Facility	Yes	No	No	No
		Class E(e) - Provision of medical or health services	Minimum of 1,500 sqm to be provided for healthcare-related uses	Yes	Yes	No	No
		Class E(f) - Creche, day nursery or day centre	Minimum of 1,100 sqm to be provided as a private early years facility	Yes	Yes	No	No

HOMES ENGLAND

Proposed uses			
Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace (GEA) enforced as part of S106 (where relevant)
		<p>E (g) Uses which can be carried out in a residential area without detriment to its amenity:</p> <ul style="list-style-type: none"> (i) Offices to carry out any operational or administrative functions, (ii) Research and development of products or processes (iii) Industrial processes 	
Class B2 - General industrial	Up to 5,200 sqm	N/A	
Class B8 – Storage or distribution	Up to 7,200sqm	N/A	

Acceptable in the following Character Areas:			
Neighbourhood Centre	River Valley	The Meadows	Hillside and Woodland
Yes	Yes	No	No
No	Yes	No	No
No	Yes	No	No

Proposed uses			
Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace enforced as part of S106 (where relevant)
Residential			
Class C1 - Hotels	Up to 80 beds	N/A	
Class C2/C3 - Residential institutions / Dwellinghouses	Up to 3,000 homes	N/A	

Acceptable in the following Character Areas:			
Neighbourhood Centre	River Valley	Meadow View	Hillside and Woodland
Yes	Yes	No	Yes
Yes	Yes	Yes	Yes

HOMES ENGLAND

Proposed uses			
Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace enforced as part of S106 (where relevant)
Sui Generis - Gypsy and Traveller pitches	Up to 15 pitches	N/A	

Acceptable in the following Character Areas:			
Neighbourhood Centre	River Valley	Meadow View	Hillside and Woodland
No	No	Yes	No

Proposed uses			
Use class	Max Total Sqm (GEA) / homes / ha	Sub class (where relevant)	Minimum or maximum floorspace enforced as part of S106 (where relevant)
Education and community use			
Class F1 - Learning and Non-residential institutions	Up to 11.75 ha	3 FE Primary School in Plot Q1 including 1 x Early Years Nursery and Student Support Centre.	A minimum site of 2.4ha to be provided
		6 FE expandable to 8 FE Secondary School including sixth form	A minimum site of 9.29 ha to be provided
Class F2 - Local community	Up to 1,200 sqm	Class F2(b)- Halls or meeting places for the principal use of the local community	Minimum of 600 sqm to be provided for community uses

Acceptable in the following Character Areas:			
Neighbourhood centre	River Valley	Meadow view	Hillside and Woodland
Yes	No	No	No
Yes	No	No	No
Yes	No	No	No

Appendix D: Validation Requirements

The Planning Application comprises a number of documents which have been scoped with HDC during pre application, meet all national requirements for 'Major' development and have regard to the Local validation lists for Horsham⁶, and West Sussex⁷ (although the application is not submitted to WSCC for determination they are a key stakeholder).

This **Appendix D** provides a summary of validation requirements across the LPAs and records how requirements have been considered.

Relevant Validation List	Document and identified requirements	Applicant response
HDC	A completed application form and the correct fee.	The Applicant has completed all required forms and paid the correct fee.
HDC / WSCC	A location and site plan	This is submitted under drawing reference WOI-HPA-PLAN-LOC-01.
HDC	The ownership certificate / Notices of all owners of the application site / An agricultural land declaration	All ownership certificates and notices have been issued.
HDC	Design and Access Statement	This is submitted under document reference WOI-HPA-DOC-DAS-01.
HDC	Affordable Housing Statement	This is submitted as part of the Planning Statement under document reference WOI-HPA-DOC-PS-01.
HDC / WSCC	Air Quality Assessment / Emissions / Mitigation Statement / Odours Assessment	This is submitted as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.
HDC / WSCC	Arboricultural Statement/Tree Survey	This is submitted under document reference WOI-HPA-DOC-AIA-01.
HDC	Biodiversity Net Gain Impact Assessment	This is submitted under document reference WOI-HPA-DOC-BNG-01.
HDC / WSCC	Biodiversity Survey and Report Ecological Impact Assessment (EIA) Report and supporting survey data or, where there would be	This is submitted as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.

⁶ Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0004/79159/Local-Validation-List.pdf (Accessed 17/07/2025)

⁷ Available at: <http://www2.westsussex.gov.uk/forms/BCD47locallist.pdf> (Accessed 17/07/2025)

	no significant biodiversity implications, a Preliminary Ecological Appraisal (PEA) Report.	
HDC	Community Infrastructure Levy – Additional Information Requirement Form	This is submitted under document reference WOI-HPA-DOC-CIL-01.
HDC	Daylight/Sunlight Assessment	A full Daylight / Sunlight Assessment was agreed not required as the potential for significant adverse impact upon the current levels of daylight/sunlight will be considered at the RMA stage when details on layout will be available. Principles on the approach are however covered within the submitted Site Wide Design Code under document reference WOI-HPA-DOC-SWDC-01.
HDC	Retail Impact Statement Sequential Assessment / Town Centre First Impact Assessment	This is submitted under document reference WOI-HPA-DOC-RIA-01.
HDC	Economic Statement	This is submitted under document reference WOI-HPA-DOC-EDS-01.
HDC	Energy Statement Sustainability/ Energy Efficiency Statement	This Energy Statement submitted under document reference WOI-HPA-DOC-ENE-01 and the Sustainability Statement is submitted under document reference WOI-HPA-DOC-SUS-01.
HDC	Environmental Impact Assessment	This is submitted under document reference WOI-OPA-DOC-ESV1-01. The methodology of the Environmental Statement was agreed through a scoping opinion (LPA ref. EIA/24/0003).
HDC	Essential Rural Workers Statement	This document is not required to be submitted as the development proposals do not constitute qualifying development i.e. the proposals do not propose dwellings specific for rural workers.
HDC	Financial Viability Appraisal / Assessment	At the point of submission of the HPA, the Applicant has proactively engaged with the LPAs and WSCC on all Section 106 requirements and submitted draft Heads of Terms (under document ref. WOI-HPA-DOC-HOT-01). On this basis, an FVA is not submitted or considered required.
HDC	Water Neutrality Statement	This is submitted under document reference WOI-HPA-DOC-WNS-01.
HDC / WSCC	Heritage Environment Record (HER) Search Heritage Impact Assessment (HIA) and Archaeological Desk-based Assessment	This is submitted as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.

HDC / WSCC	Land Contamination Assessment	Requirements are addressed by the Phase 1 Ground conditions assessment submitted under document reference WOI-HPA-DOC-GCA1-01.
HDC / WSCC	Landscape Impact Assessment / Landscape Visual Impact Assessment	This is submitted as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.
HDC	Lighting Assessment	This is submitted as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.
HDC	Marketing Information	This is not considered required for this planning application, given its nature and scale of employment and community uses proposed.
HDC / WSCC	Minerals Resource Assessment	This has been submitted under document reference WOI-HPA-DOC-MRA-01.
HDC / WSCC	Noise Impact Assessment	This is submitted as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.
HDC	Open Space Assessment	This is submitted as a Golf Course Assessment under document reference WOI-HPA-DOC-GOL-01.
HDC / WSCC	Planning Statement	This is submitted under document reference WOI-HPA-DOC-PS-01.
HDC	Statement of Community Involvement	This is submitted under document reference WOI-HPA-DOC-SOC-01.
HDC	Structural Statement and Survey	This document is not required to be submitted as the development proposals do not constitute qualifying development (i.e. no buildings are proposed in detail).
HDC / WSCC	Surface Water Drainage Statement Flood Risk Assessment	This is submitted under documents referenced (WOI-HPA-DOC-FRA-01) and WOI-HPA-DOC-SWDS-01. Information is also included as part of the Environmental Statement under document reference WOI-HPA-DOC-ESV1-01.
HDC	Telecommunication Development – Supplementary Information	The HPA does not propose mast or antennae development by mobile phone operators and therefore this document is not required.

HDC / WSCC	Transport Assessment / Transport Statement	This is submitted under document reference WOI-HPA-DOC-TA-01.
HDC	Travel Plan Mobility Strategy	This is submitted as a Framework Travel Plan under document reference WOI-HPA-DOC-FTP-01.
HDC	Utilities / Services Strategy / Assessment	This is submitted under document reference WOI-OPA-DOC-UTI-01.
HDC	Ventilation / Extraction Statement	The potential for adverse impact resulting from ventilation requires an understanding of matters which remain reserved, and MEP details will be considered at the RMA stage when further details will be available. This document is therefore not required.
HDC / WSCC	Other plans (Elevations, Floor plans, sections, roof plans, advert details)	Please refer to the drawing register that is submitted as part of this HPA.
WSCC	Planning Obligations Instruction Form	This is submitted under document reference WOI-HPA-DOC-HOT-01.
WSCC	Safety Audit / Stage 1 Road Safety Audit	Requirements are included within submitted Transport Assessment under document reference WOI-OPA-DOC-TA-01.
WSCC	Alternative Sites Assessment	The Application is not for minerals and waste development and this document is therefore not required.
WSCC	Dust Assessment	This is submitted as part of the Environmental Statement (Chapter 6) under document reference WOI-HPA-DOC-ESV1-01.
WSCC	Hydrological / Hydrogeological Assessment	The Application is not for qualifying development or in a qualifying location and therefore this document is not required.
WSCC	Need Statement	This is addressed within the Planning Statement submitted under document reference WOI-HPA-DOC-PS-01.
WSCC	Recovery v. Disposal Statement	The Application is not for qualifying development and therefore this document is not required.
WSCC	Working and/or Restoration and Aftercare Scheme	The Application is not for qualifying development and therefore this document is not required..