The Housing and Regeneration Agency

Homes England

West of Ifield, Crawley
Retail Impact Assessment

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

July 2025

HOMES ENGLAND
WEST OF IFIELD

RETAIL ASSESSMENT

JUNE 2025

THIS IS THE CONTENTS

1.0 INTRODUCTION

1.1 This Retail Assessment (the 'Statement') has been prepared by Montagu Evans LLP in support of an application (the 'Application') submitted to Horsham District Council (the 'Council') on behalf of Homes England (the 'Applicant'), for the development of the site known as West of Ifield (the 'Site').

1.2 The Application comprises a strategic development of up to 3,000 residential units, alongside a range of supporting uses, including schools, a hotel, community uses, a new road network and cycleways, employment, and retail ('the Proposed Development').

1.3 The Proposed Development will create four new neighbourhoods, each accommodating different uses, including a 'Neighbourhood Centre' where the majority of the retail and community uses will be located.

1.4 The Site falls within the Horsham District Council Local Authority area, although it immediately abuts the Crawley Borough Council Local Authority boundary. Whilst the Site falls outside of Crawley Borough, the proposals will, in effect, act as an urban extension to Crawley.

1.5 The description of development for the Application 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 or 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 accompanied by an Environmental Statement.*
>
> *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.*

1.6 The full element of the application seeks approval for the enabling infrastructure, including the secondary school and access routes. The outline element of the Application reserves all matters for later approval. All remaining matters relating to scale, layout, appearance and landscaping will be reserved and subject to subsequent reserved matters applications at a later date.

1.7 A full explanation of the Proposed Development is contained within the Planning Statement. However, in summary, it will deliver the following:

'Full' Element

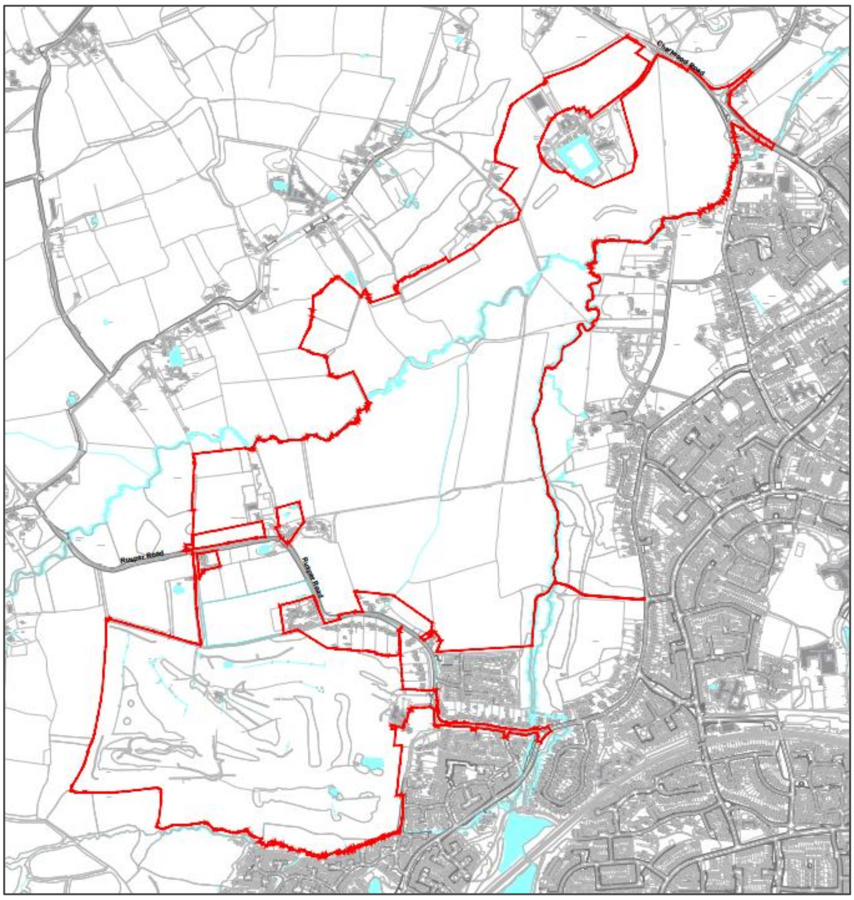
- Delivery of the first phase of the Crawley Western Multi-Modal Corridor, a new road with a dedicated bus lane and regular traffic lane in each direction, to form a connection from Charlwood Road to the east and the primary access route to the development.
- A primary street forming a spine road incorporating primary and secondary street connections, together with parking and loading bays, street lighting and fixtures.
- Active travel provision with dedicated cycle ways and footways within the primary street.
- 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.
- 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.
- Landscape works incorporating sustainable urban drainage system (SuDS) corridors, flood mitigation features, ecological mitigation and enhancement, noise mitigation (including noise bund) and soft landscaping.
- Local amendments to existing public rights of way.

'Outline' Element

- Phased mixed use development of up to 3,000 homes, including a range of flats and houses, of which 35% will be affordable.
- Neighbourhood Centre and associated community facilities, including a primary and secondary school, and minimum commitments to health centre, community centre, early year nursery and Local Leisure facility, alongside small scale centre uses including retail and potential hotel.
- Employment uses including flexible office and innovation space, alongside general industrial and logistics space across the neighbourhood centre and in the River Valley character area.
- Allowances for the potential delivery of specialist accommodation to suit older persons, as well as up to 15 gypsy and traveller pitches and commitments to Custom and Self build housing.
- Public open space and multifunctional green space with allotments, sports pitches, including a new sports hub, recreation, amenity green space play and ancillary facilities, retained landscape features, a minimum of 10% net gain in biodiversity, and strategic green space commitments.
- Allowances for key infrastructure and utilities, notably to achieve water neutrality including water treatment works and abstraction boreholes.
- The prioritisation of more sustainable travel modes and facilitated active mode connections, including an off-site pedestrian and cycle link across the Meadows, off-site improvements to connect to Ifield station via public transport and cycle links, and through safeguarded expansion to multi-modal corridor provided under the detailed element.

1.8 An extract from the Site Location Plan, which shows the location of the Site in relation to the urban area of Crawley is provided at Figure 1.1 below.

Figure 1.1 – Extract from Site Location Plan



1.9 This Statement provides an assessment against the relevant planning policy tests with regards to the retail elements of the Proposed Development. It identifies key retail policies at national and local level which are relevant to the consideration of the Application and provides an assessment of the proposals against these key policies. The acceptability of other community uses is addressed in the accompanying Planning Statement.

1.10 The rest of this Statement is structured as follows:

2. **The Proposed Development and Site Context** – This Section provides an overview of the retail uses proposed by the application**.** It also considers the context of the Site within the wider retail landscape, providing an overview of the existing retail provision within the catchment area of the Proposed Development.

3. **Planning Policy Framework** – Here we set out the relevant planning policy which will need to be considered when assessing the level and type of retail floorspace associated with the development proposals. At a national level this includes the National Planning Policy Framework (NPPF) and associated Practice Guidance, while at a local level, policies from the Horsham District Planning Framework have been considered.

4. **The Sequential Test** – This section considers the application of the sequential test in respect of the proposed retail floorspace, and identifies whether there are any more centrally located sites which are both available and suitable;

5. **The Impact Assessment** – This section analyses the potential impact of the retail floorspace on the allocated centres within the wider catchment area; and

6. **Summary and Conclusion** - This section summarises the key issues considered in the Statement and provides the conclusions of the assessment.

1.11 This Statement concludes that the Proposed Development will not lead to any impacts on existing centres or on planned investment to a level which could be considered to be 'significantly adverse', this being the key policy test. It also concludes that the Site is the most sequentially preferable location for the proposed retail floorspace.

1.12 The primary role of the proposed commercial and community uses, including the proposed retail floorspace, is to support wider residential development, helping to create a sustainable neighbourhood. The scale of the retail floorspace has been specially designed to ensure that it meets that need arising from the residential development, while at the same time limiting the potential impact on existing provision within the wider area. It therefore follows that the Proposed Development is entirely acceptable in relation to retail planning policy and should be supported.

2.0 THE PROPOSED DEVELOPMENT AND SITE CONTEXT

THE PROPOSED DEVELOPMENT

2.1 The Proposed Development proposes the comprehensive redevelopment of the Site to deliver a residential-led scheme. The proposals include the provision of up to 3,000 residential units, comprising a mix of flats, maisonettes and houses. Although the Site is located within Horsham District, it will in effect act as an urban extension to Crawley.

2.2 The Site comprises a number of parcels of land, both to the north and south of Rusper Road, immediately to the west of Ifield. Much of the land to the south of Rusper Road currently comprises the Ifield Golf Course, while the land to the north is mostly open fields. The Site falls within the administrative boundary of the Horsham District Local Authority area, with the majority of it also falling within the Rusper Parish Council area. The Site immediately abuts the Crawley Borough Council Local Authority area.

2.3 The Site is located close to the A264, which provides good road links to central Horsham and Crawley, in addition to direct access to the A24, A23 and M23. The Site benefits from good public transport accessibility from existing bus services within Ifield, including Ifield Mill, Caspey Road and Shipley Road bus stops. Ifield is also the closest railway station to the Site, being located approximately 0.9 km to the east of the Site boundary.

2.4 In addition to the primary residential uses, the Proposed Development also includes the following supporting uses (indicative floorspace in GEA):

- Up to 40,130 sq. m of Class E uses, including:
    - Maximum of 5,200 Class E(a) Retail, including a foodstore of 1,900 sq. m;
    - Minimum of 3,400 sq. m Class E(d) Leisure Facility;
    - Minimum of 1,500 sq. m Class (e) Health Centre;
    - Minimum 1,100 sq. m Class E(f) Creche;
    - Class E(b) Restaurant / Café (no minimum area proposed);
    - Class E(c) Financial Services (no minimum area proposed);
    - 4,900 sq. m Class E(G) Office / Innovation Centre;
- A new 3FE Primary School in Plot Q1 including an Early Years Nursery and Student Support Centre;
- A new 6-8 FE Secondary School including sixth form;
- Up to 5,200 sq. m Class B(2) General Industrial;
- Up to 1,200 sq. m Class F2(b) Community Centre;

- Up to 7,200 sq. m Class B8 Storage or Distribution;
- Up to 80 bed Class C1 Hotel; and
- Up to 15 Gypsy & Traveller pitches.

2.5 The Proposed Development will be formed of four areas, Hillside & Woodlands, Neighbourhood Centre, The Meadows and River Valley. Hillside & Woodlands and the Meadows and will predominantly be residential, while the Neighbourhood Centre and River Valley will comprise predominantly commercial uses.

2.6 The new Neighbourhood Centre will encompass a mix of retail and commercial uses with the intention of meeting the day-to-day needs of the residents, including a foodstore, smaller retail units as well as other employment and community uses, small-scale residential units and associated car parking. The proposed Primary and Secondary Schools will also sit adjacent to the Neighbourhood Centre, and the proposed Crawley Western Multi-Modal Corridor ('CWMMC') and bus route will run through this area.

2.7 **Table 2.1** below sets out the quantum of retail uses currently proposed:

Table 2.1 – Proposed Retail Uses (Use Class E)

Use	Total GEA sq. m (up to figure)
Convenience Retail (Foodstore)	1,900
Comparison Retail (Local Shops)	3,300
TOTAL	**5,200**

2.8 In addition to the proposed retail uses, it is also anticipated that the Neighbourhood Centre could also accommodate the supporting commercial uses set out in **Table 2.2** below.

Table 2.2 – Other Commercial and Community Uses within Neighbourhood Centre

Use	Total GEA sq. m (up to figure)
Leisure Facility (Use Class E)	3,400
Creche	1,100
Health Centre (Use Class E)	1,528
Community (Use Class F(2))	634
Innovation	4,900

Hotel	4,400

2.9 A further 14,008 sq. m GEA of Class E floorspace could be brought forward in River Valley, although the maximum Class E(a) retail floorspace of 5,200 sq. m across the Site will not be exceeded,

2.10 This Statement focusses predominantly on the proposed retail floorspace as set out in Table 2.2 above. However, it will also be relevant to consider the supporting leisure facilities to be provided in the Neighbourhood Centre.

2.11 As noted above, the figures set out in Tables 2.1 and 2.2 are maximum GEA figures. In this Statement we will make an assumption about GIA, net sales areas and the potential split between comparison and convenience floorspace of the units to understand their likely turnover. This is set out in more detail within the supporting Retail Impact Tables at **Appendix 1**.

2.12 At this stage the end occupiers of the retail uses are not known. As such, when undertaking the assessment, an assumption on the potential end-users has been made to establish the likely turnover of the floorspace.

2.13 In order to understand how the Proposed Development will sit and interact with the wider area, in the remainder of the Section we identify the existing retail provision within the Catchment Area of the Development to help to establish where trade to the proposed retail floorspace might be diverted from existing stores. This will assist in understanding whether any diversion is likely to lead to a significant adverse impact on any existing allocated centres, which is explored in more detail in Section 5.

SITE CONTEXT AND EXISTING RETAIL PROVISON

2.14 The Site is located to the west of Crawley Town Centre. The Site is located within the Horsham Local Authority Area, with Horsham Town Centre located approximately 8km (a 16-minute drive) from the Site. It sits on the eastern edge of the Crawley urban area, with the surrounding areas to the west, north and south providing a more rural setting, with a lower population and few retail facilities. Crawley Town Centre is located approximately 4km to the east (a 9-minute drive). As such, when understanding where trade to the proposed retail uses might be drawn from, this will focus predominantly on stores and centres within the Crawley urban area, rather than Horsham.

2.15 The primary role of the proposed retail provision is to meet the day-to-day needs of the new residential development. However, it is likely that there will be in and out-flow of trade from the Site to surrounding stores and centres. This will be the case for both comparison and convenience goods. The proposed foodstore in particular will draw from a wider area than just the Site and therefore has the potential to impact upon shopping habits outside of site boundary of the Proposed Development.

2.16 Although the proposed comparison floorspace is likely to comprise small scale units to support the day-to-day needs of the Masterplan population only, it is inevitable that some trade will also be drawn in from outside even for these uses, due to linked trips with the other educational or community uses. As such, it will also be necessarily to consider the potential effects of the comparison floorspace on the wider retail provision as well.

2.17 Crawley has a structured hierarchy of centres, with Crawley Town Centre sitting at the top, providing the main centre for retail and leisure services within the Borough. This is supported by a total of 16 Neighbourhood Centres spread around the Borough, which are much smaller in scale and are designed to meet the day-to-day needs of the local population.

2.18 Given the relatively local nature of type and scale of floorspace proposed, the Catchment Area within Crawley is also likely to be quite localised, focussed on stores and centres close to the Site, predominantly on the western side of Crawley. As such, in this Section we focus on the Neighbourhood Centres which are close enough that the proposed retail floorspace could have an impact on their trade.

2.19 We also consider the impacts on Crawley Town Centre as well as existing out-of-centre provision across the Borough, most of which can be accessed quickly via the A23 Crawley Avenue.

2.20 Regarding centres within Horsham, only Rusper Village is located close enough to potentially be affected by the proposed retail floorspace.

2.21 Below we provide an overview of the role and function of the relevant centres and existing retail provision within what is the Primary Catchment Area to the Site. All of the centres identified below are set out on a map at **Appendix 2** of this Statement.

2.22 The information relating to Crawley Town Centre and the supporting Neighbourhood Parades is based upon a site visit and survey of each of the centres, undertaken by Montagu Evans in February 2025, and updates the information from the Crawley Borough Council '*Retail Commercial Leisure & Town Centre Neighbourhood Needs Assessment'* (2020) (the 'Retail Study').

CRAWLEY TOWN CENTRE

2.23 Crawley Town Centre is the main retail centre and leisure destination within Crawley Borough. It is also a key shopping destination for people living in the wider sub-region.

2.24 Crawley Town Centre accommodates a wide range of shops, entertainment, recreational uses, cafés, restaurants and bars. The Town Centre is broadly defined by Crawley Leisure Park and Town Hall in the north, Pegler Way in the west, Crawley Train Station in the south, and Crawley College in the east.

2.25 At the time of the survey, Cawley Town Centre had a total of 380 units. The Town Centre's convenience provision comprises an Iceland supermarket located on Queens Square within the Town Centre, with an Asda Superstore located on Peglar Way on the edge of the Town Centre boundary. A number of smaller independent convenience stores are also located within the Town Centre.

2.26 It is noted that the existing convenience provision has recently reduced significantly following the closure of Marks and Spencer in November 2024, Sainsbury's in 2021 and Morrisons in 2019.

2.27 The Town Centre has a strong comparison goods offer and has the highest market share across most categories of comparison goods within the Borough. A notable amount of the comparison goods offer is contained within the County Mall Shopping Centre, which accommodates over 90 shops, with occupiers including Primark, Next, B&M and Boots. It also has an 1,800-space car park, which provides one of the main town centre car parks. Other national retailers in the Town Centre includes Decathlon, Poundland, TK Maxx and New Look.

2.28 Crawley has seen the loss of a number of a number of comparison retailers over recent years due companies entering administration, such as Debenhams, Topshop and Dorothy Perkins, as well as the closure of Marks and Spencer, although the comparison goods offering remains strong.

2.29 This is reflected in the low vacancy rates in the town centre. At the time of the survey in February 2025, the proportion of vacant units in Crawley was 8.89%. This is significantly below the UK average for 2024 of 19.6%. [1]

[1] *Figure taken from Retail Planner Briefing Note 22 (March 2025)*

2.30 Policy TC3 of the adopted Crawley Local Plan (October 2024) identifies a total of seven 'Key Opportunity Sites' within Crawley Town Centre allocated for redevelopment to provide either main town centre uses or mixed-use development:

- Telford Place, Three Bridges;
- Crawley Station and Car Parks;
- County Buildings;
- Land North of the Boulevard;
- Crawley College;
- Cross Keys; and
- Former MOKA Nightclub.

2.31 Crawley Town Centre is widely accessible by a variety of modes of transport. It is well served by public transport with a number of bus stops served by a range of services. Crawley train station is located within the Town Centre boundary, offering frequent trains to London Victoria and London Bridge, via Gatwick Airport. Crawley Town Centre also features a good level of car parking provision, including around 4,000 spaces, within the Town Hall and Orchard Street multi-storey car parks, and at Crawley Hospital, Crawley Library and Tilgate Park.

2.32 More information is provided in the detailed Health Check of Crawley Town Centre and associated Goad Plan attached at **Appendix 3.**

NEIGHBOURHOOD CENTRES

2.33 As noted above, Crawley Town Centre is supported by 16 smaller Neighbourhood Centres. However, it is unlikely that all of these will be affected by the development proposals, for example those to the east of the Town Centre. As such, in this section we focus on the 14 centres closest to the Site which have the potential to be affected by the Proposed Development. A summary of each centre is provided below.

IFIELD

2.34 Ifield Neighbourhood Centre is located to the north-west of Crawley Town Centre, circa 1.3 km east of the boundary of the Site. The centre is located within the Ifield residential area and is designed to meet the day-to-day convenience needs of the local community.

2.35 The centre comprises a linear retail parade providing a mix of retail and services, including three convenience stores occupied by Morrisons Daily, a Co-Op and a Best-One, as well a number of health and beauty salons, takeaways / restaurants and a bookmaker. At the time of the site visit, all units were occupied.

2.36 The centre is attractively landscaped, with a wide pavement providing public seating areas and a community noticeboard.

2.37 The centre has good accessibility via public transport, with the 'Ifield Parade' bus stop located directly adjacent to the main retail parade, offering frequent bus services to Crawley Town Centre and Gatwick North Terminal. There is also a dedicated car park to the east, as well as on-street parking.

IFIELD WEST

2.38 Ifield West, also referred to as 'Dobbins Place', is located west of Crawley Town Centre, approximately 0.2km to the south of the Site, and is the closest designated centre to the Site. It lies within the residential neighbourhood area of Ifield West.

2.39 It is comprised of a single Tesco Express convenience store and a community centre. There are currently no vacant units.

2.40 The centre has a dedicated car parking area, and is served by Bus Route 2, which connects the centre to Ifield, Crawley Town Centre and Tailgate.

2.41 Given that Tesco Express is the single retail unit within the centre, it meets a very localised convenience need only.

SOUTHGATE

2.42 Southgate Neighbourhood Centre is situated between Southgate Avenue and Brighton Road, to the south of Crawley Town Centre, circa 3.5km south-east of the Site boundary.

2.43 The centre comprises a total of 13 no. units, in a mix of retail and service uses, including 2 no. takeaway / restaurants, a laundrette, a tanning studio and healthcare services. The convenience retail provision comprises a Best-One convenience store. The Downsman pub is situated on the edge of the centre. At the time of the site visit there was one vacant unit within the centre.

2.44 There is a dedicated car park to the front of the units, and cycle parking is also provided. The centre is served by Bus Route 1, which connects the centre to Crawley Town Centre and Broadfield.

2.45 The surrounding area is extensively landscaped, creating an attractive public realm, with seating areas provided. The centre is designed to meet the day-to-day needs of the local Southgate population, and it is considered that it performs this function well.

TILGATE

2.46 Tilgate is located to the south of Crawley Town Centre, circa 4 km south east of the Site boundary.

2.47 It is a comparably large centre compared to others in the Borough and includes a total of 19 units in a mix of with retail and service uses. The convenience provision includes a Co-Op foodstore and a number of smaller independent convenience stores as well as a Morrisons Daily located on the edge of the centre at the Shell Petrol Station. At the time of the site visit there were no vacant units.

2.48 The centre accommodates a number of comparison goods retail units along the shopping parade including a pet shop and a party store in addition to a pharmacy, a dry cleaners, several newsagents and off-licences and a hairdressers. To the west of the centre is the Grasshopper Pub the Shell petrol station.

2.49 The centre has a dedicated parking to the front of the units and provide a number of cycle parking stands. The closest bus stops to the centre are on Ashdown Drive to the south, which are served by Bus Route 2 as well as school buses 610 and 693.

2.50 Tilgate has attractive landscaping and dedicated seating aeras, contributing to the overall environmental quality.

2.51 Despite its size, the scale and nature of the individual units suggest that the centre is designed to serve the convenience needs of the local community only.

FURNACE GREEN

2.52 Furnace Green is located to the south east of Crawley Town Centre, circa 4.3 km south east of the Site boundary.

2.53 It comprises of 11 units, which include a range of retail and services uses, including a Budgens and Best-One convenience stores. The centre also includes a pharmacy, newsagents and a hot food takeaway. There is a is also a public house. At the time of the site visit there were two vacant units.

2.54 The centre is served by Bus Route 2 as well as school buses 610 and 693. Dedicated parking is provided to the font of the units and there are also areas of attractive landscaping and seating provision. Toilet facilities are also provided.

WEST GREEN

2.55 West Green is located to the north west of Crawley Town Centre, circa 2 km east of the Site boundary.

It includes a shopping parade comprising of 7 units, including an independent convenience store, a pharmacy, takeaway uses and The Apple Tree Pub. At the time of the site visit there were no vacant units

2.56 Dedicated parking and cycle parking stands are provided to the front of the units, and the centre provides a variety of public realm features, including seating, bins, and some landscaping. The centre is served by Bus Routes 2 and 3, as well as school bus service 603.

2.57 The centre is comparatively smaller than the other Neighbourhood Centres and is designed to meet a localised convenience need only.

NORTHGATE

2.58 Northgate is located to the north of Crawley Town Centre, circa 3.4 km east of the Site boundary. It comprises of a shopping parade accommodating a range of retail and service uses, including a number of takeaways, a bakery, hairdressers, bookmakers and the Black Dog pub. The convenience provision comprises a single independent convenience store. A BP petrol station is located just to the north of the centre. At the time of the site visit there were no vacant units

2.59 The centre has a dedicated car park with several cycle parking stands. Whilst the car park features landscaping, the main retail parade does not provide any landscaping. The centre is served by Bus Route 100, which connects it to Crawley Town Centre, Three Bridges, Maidenbower, Gatwick, Horley and Redhill.

2.60 Northgate is a small Neighbourhood Centre, serving the day-to-day convenience needs of the local community.

LANGLEY GREEN

2.61 Langley Green is located to the north of Crawley Town Centre, approximately 2.5 km east of the Site boundary.

2.62 It is a medium sized L-shaped centre, with an internal dedicated car park. The centre accommodates a range of convenience retailers, including a Co-Op foodstore and an off-licence. It also includes a number of takeaway uses, a laundrette, pharmacy a pub and a post office. At the time of the site visit there were no vacant units

2.63 The centre provides a good level of landscaping, decorative seating boxes and lighting posts. Pedestrian footfall was high at the time of the site visit. The centre is served by Bus Routes 4, 5 and 200, which connects it to Crawley Town Centre, Pound Hill, Three Bridges and Gatwick.

GOSSOPS GREEN

2.64 Gossops Green is located west of Crawley Town Centre, approximately 1 km from the site boundary.

2.65 The centre offers a mix of retail and service uses, including a Morrisons Daily convenience store and two off-licences. There is also a pharmacy, a barbers, a bookmaker and a number of takeaways, as well as The Windmill public house. At the time of the site visit there was one vacant unit.

2.66 There is a small, dedicated parking area. The centre is served by Bus Routes 3 and 200, as well as school roues 603 and 692, connecting the centre to the wider residential areas as well as Crawley Town Centre, Ifield, Bewbush, Horsham and Gatwick.

2.67 The centre is well-maintained, featuring grassed areas, seating, and an overall welcoming environment, and meets the day-to-day convenience needs of the local residential population.

BEWBUSH

2.68 Bewbush is located to the west of Crawley Town Centre, circa 1.3 km south of the Site boundary.

2.69 The centre has a mix of retail and service uses, including a Co-Op foodstore and Morrisons Daily convenience stores. There is also a pharmacy and a post-office. At the time of the site visit there were no vacant units.

2.70 Bewbush is located directly adjacent to the Bewbush Academy, the Bewbush Community Centre and a nursery. The centre includes a large dedicated large car parking area, which features shrubbery and tree planting, helping to contribute to the overall environmental quality.

2.71 The Centre is served by number of buses, connecting the centre to the wider residential areas as well as Crawley Town Centre, Horsham, Gatwick and Three Bridges.

2.72 Bewbush is a small Neighbourhood Centre, serving the day-to-day convenience needs of the local community.

BROADFIELD

2.73 Broadfield is located to the north of Crawley Town Centre, approximately 3.4 km east of the boundary of the Site boundary.

2.74 The centre comprises of a pedestrianised shopping area, consisting of a mix of comparison and convenience goods retailers. Retailers include Iceland, Poundland, and a Premier convenience store, along with a newsagent, a hardware store, a post office and a pharmacy. It also includes a number of takeaways and a bookmaker. The parade provides a large car park, which was well used at the time of the site visit.

2.75 An Esso petrol filling station is situated on the edge of the centre. To the east, Broadfield Library and Broadfield Community Centre offer community services and amenities. The Grand Bay pub is located on the western edge of the centre. At the time of the site visit there were no vacant units.

2.76 The centre is served by a number of bus routes connecting it to the surrounding areas, including Crawley Town Centre, the Manor Royal Industrial Estate, Gatwick Airport, and Three Bridges. Cycle parking is also provided within the Centre.

2.77 During the site visit, the overall perception of safety within the town centre was positive. Tree planting and shrubbery within the car parking area helps contribute to the overall environmental quality.

2.78 Broadfield is one of the larger centres within Cralwey, with a number of larger floorplates units than other smaller local parades. It therefore has the ability to draw trade from a wider area than the immediate local residential area as demonstrated by the large, dedicated car park to the front of the Iceland and Poundland units. However, the majority of trade is still expected to come from the wider Broadfield area, which comprises large residential area to the south of Crawley.

DOWNLAND DRIVE

2.79 Downland Drive comprises of a single Tesco Express convenience store, located to the north of Crawley Town Centre, circa 2.4 km east of the boundary of the Site boundary. Given that Tesco is the only unit in the centre, there were no vacant units at the time of the site visit.

2.80 There is a small amount of dedicated car parking, as well as cycle stands and seating. The Centre provides fully ramped access. The centre is served by Bus Route 1, which connects it to Crawley Town Centre and Broadfield.

2.81 Given the scale of the centre, there is limited landscaping, however the general upkeep of the surrounding area was perceived to be adequate.

2.82 As the centre only accommodates a single convenience store, it meets a very localised need.

RUSPER, HORSHAM

2.83 Rusper is located within Horsham District Council to the north of Horsham Town Centre, situated approximately 3 km west of the Site boundary.

2.84 The Centre comprises a mix of community facilities and retail services. It includes the Star Inn, the Plough and Attic Rooms pubs, alongside a small convenience store which includes a post office. As the centre only accommodates a single convenience store, it meets a very localised need.

2.85 Accessibility by public transport is limited. The centre is served by one bus stop which provides services south to Horsham Town Centre. The Star Inn pub has a reasonably sized car park providing parking for private vehicles.

2.86 The environmental quality of the centre is good with lots of tree cover, grassed areas, planting and seating areas.

2.87 Rusper is a small centre, serving the day-to-day convenience needs of the local community.

OUT-OF-CENTRE PROVISION

2.88 In addition to the allocated centres identified above, there are also a number of out-of-centre retail locations across Crawley which have the potential to be affected by the development proposals. Although not given the same level of protection under the NPPF and Development Plan policy as the Town and Neighbourhood Centres, it is necessary to identify these to understand if any trade is likely to be diverted from these stores to the proposed retail floorspace at the Site.

- **Acorn Retail Park** – the Retail Park is located to the north of Crawley Town Centre, situated approximately 3.5km north east of the Site boundary. It has a total of three units, including an Aldi foodstore and an M&S Food Hall alongside Smyths Toys;

- **County Oak Retail Park** – the Retail Park is situated directly south of Acorn Retail Park, located circa 3.5km north east of the Site boundary. It accommodates a number of national retailers including B&M, Boots, Currys PC World, Halfords, Harvey's, Hobbycraft, Wren Kitchens, Next and TX Maxx.

- **London Road Retail Park** - London Road Retail Park is situated north of Crawley Town Centre, located circa 2.8km from the Site, and accommodates B&Q, Matalan and Carpetright (soon to be Tapi);

- **Sainsbury's / The Range, Crawley Avenue** - Sainsbury's and the Range are located adjacent to the London Road Retail Park, approximately 2.8km east of the Site along Crawley Avenue. The site also accommodates a Sainsbury's Petrol Filing Station and a McDonald's drive-thru restaurant;

- **Lidl /Iceland, Hazelwick Avenue** – Both Lidl and Iceland supermarkets located on Hazelwick Avenue, close to Three Bridges, some 5.7 km to the east of the Site, and east of the Town Centre. Although located on the opposite side of Crawley to the Site, due to their proximity to the wider road network, they are only an eight-minute drive from the Site, and are likely to draw trade from across the wider Crawley area; and

- **Tesco Extra, Hazelwick Avenue** – the Tesco Extra store is located further north along Hazelwick Avenue from the Lidl and Iceland stores, approximately 5.6km from the Site, again an eight-minute drive. The Crawley Retail Study (2020) confirms that the store is a major draw in the wider area for both convenience and comparison goods shopping and therefore draws from right across the wider Crawley area.

SUMMARY OF EXISTING RETAIL PROVISION

2.89 In this section we have identified the key stores and centres which have the potential to be affected by the proposed retail floorspace associated with the Proposed Development. In addition to Crawley Town Centre and the out-of-centre retail provision across Crawley Borough, we have also identified which of the 16 designated Neighbourhood Centres have the potential to be impacted upon.

2.90 It is clear that these Neighbourhood Centres perform strongly, with only four vacant units being identified across the 13 centres set out above. They provide a range of retail services and are very much designed to meet the day to day needs of the local resident population, rather than provide a main retail offer.

2.91 Although it is also evident that the retail provision within Crawley Town Centre has suffered in previous years, with the closure of Morrisons, Sainsbury's and Marks & Spencer store, the town continues to have a low vacancy rate and strong comparison goods offering, demonstrating the key role it plays as a sub-regional centre.

3.0 PLANNING POLICY FRAMEWORK

3.1 Here we set out details of the planning policy framework relevant to the proposals. At a national level this comprises the National Planning Policy Framework and associated Planning Practice Guidance. At a local level this comprises the policies within the Horsham District Planning Framework.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

3.2 The National Planning Policy Framework (NPPF) (December 2024, updated February 2025) states that the purpose of the planning system is to contribute to the achievement of sustainable development - performing economic, social and environmental roles. The three roles are interdependent and need to be mutually supported.

3.3 **Paragraphs 7-14** confirm that at the heart of the NPPF is a presumption in favour of sustainable development. The planning system should therefore promote sustainable development solutions.

3.4 **Paragraphs 85-89** state 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. Planning decisions should also recognise the specific locational requirement of different sectors.

3.5 **Paragraphs 90-95** of the NPPF seek to ensure the vitality of town centres and requires that planning policy should provide a framework to assess proposals for main town centre uses, such as retail, which cannot be accommodated in or adjacent to town centres. **Paragraph 91** requires proposals to demonstrate compliance with the sequential test, and paragraph 89 to demonstrate that the proposals will not have a significantly adverse impact on any designated local centres.

3.6 Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan, for example an out-of-centre site allocated for retail development. That is to say that main town centre uses should be located in allocated town centres, then in edge of centre locations and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

3.7 Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, and the sequential test should be considered in light of the latest NPPF policy, which confirms that when considering availability, it is necessary to consider sites which may become available within a reasonable period.

3.8 Details of how this policy should be applied are contained in the NPPF Planning Practice Guidance 2019 as well as relevant Secretary of State decisions. The supporting Planning Practice Guidance (PPG) confirms that the application of the sequential test should be proportionate and appropriate for the given proposal.

3.9 With regards to retail impact, the PPG confirms:

> *The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider: the scale of proposals relative to town centres*

- *the existing viability and vitality of town centres;*

- *cumulative effects of recent developments;*
- *whether local town centres are vulnerable;*
- *likely effects of development on any town centre strategy; and*
- *impact on any other planned investment*

As a guiding principle impact should be assessed on a like-for-like [our emphasis] basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities. Conditions may be attached to appropriately control the impact of a particular use.

3.10 Given that the Proposed Development includes the provision of more than 2,500 sq. m of retail and other town centre floorspace, an impact assessment is expected to be required to support the application, considering the criteria set out above.

3.11 **Paragraph 98** of the NPPF seeks to promote healthy and safe communities, and sets out that policies and decisions should plan positively for the provision of community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, and other local services to enhance the sustainability of communities and residential environments.

HORSHAM DISTRICT COUNCIL POLICY

Adopted Development Plan

3.12 The statutory Development Plan for Horsham District Council currently consists of the following:

- Horsham District Planning Framework (November 2015); and
- Horsham District Planning Framework Policies Map (2015).

3.13 The Horsham District Planning Framework (the 'HDPF') is the overarching planning document for Horsham District outside the South Downs National Park (SDNP).

3.14 **Strategic Policy 12** of the HDPF discusses the vitality and viability of existing retail centres in the district and sets out to establish a hierarchy for town and village centres, including:

- Primary centre: Horsham Town Centre;
- Secondary centres: Billingshurst, Henfield, Pulborough, Southwater, Steyning and Storrington; and
- Tertiary centres and outlying small retail units: smaller village centres and shops.

3.15 The Policy confirms the hierarchy of retail centres will be supported and enhanced through a series of measures, including by maintaining a diverse range and choice of suitable uses including retail, leisure, entertainment, sports and recreation, arts, culture, business and commercial uses as well as residential uses.

3.16 **Strategic Policy 6** relates to retail development and other main town centre uses and states:

Any proposed development for main town centre uses which on its own or which cumulatively reaches a threshold of an additional 2,500sq m will need to demonstrate that it will not have an adverse impact on the vitality and viability of Horsham town centre. This should include an assessment of the impact on existing, committed and planned public and private investment in the Town Centre.

3.17 **Strategic Policy 13** relates to proposals for town centre uses including new retail and change of use. With regards to new retail floorspace in out-of-centre locations, the policy confirms that:

> *Proposals for main town centre uses, including new retail warehouses, superstores, extensions to existing retail units, recreation, leisure and entertainment uses should be located in town centres and at an appropriate scale in village centres in accordance with the Council's Town Centre First strategy. Proposals for main town centre uses outside the defined town and village centres will be permitted only when a sequential test has been applied.*

3.18 **Policy 43** of the HDPF relates to Community Facilities, Leisure and Recreation. The policy confirms 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 and other relevant studies, or contribute to the provision of Green Infrastructure. In addition to supporting facilities or services located in accordance with the Development Hierarchy and Strategic Development locations, sites located outside built-up areas will be supported where this is the only practicable option and where a suitable site well-related to an existing settlement exists.

Emerging Planning Policy

3.19 The Council is in the process of preparing a new Local Plan (the 'Emerging Local Plan'). In July 2024, HDC formally submitted the Horsham District Local Plan 2023 – 2040 and supporting documents to the Planning Inspectorate for Examination.

3.20 The Inspector raised significant concerns about the soundness and legal compliance of the Local Plan, and on 4th April 2025, the Inspector recommended that the draft Local Plan should be withdrawn.

3.21 At the time of writing, it is expected that the Horsham District Local Plan 2023-2040 will be withdrawn, 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.

3.22 Therefore, although subject to formal withdrawal which requires HDC's sign off, limited, if any, weight is applied to the Horsham District Local Plan 2023-2040 Regulation 19 document.

Evidence Base

3.23 Although the Emerging Local Plan hold limited to no weight, the Evidence Base retains some weight.

3.24 The Horsham Town Retail & Leisure Study (2017) was undertaken to build upon and update previous evidence to support the implementation of the HDPF. It remains the most up-to-date Retail & Leisure study published by the Council.

3.25 The Study examines the retail performance of Horsham Town Centre in the context of the retail network across the wider sub-region and the influence of key competing strategic centres on the current and future role of the town centre.

3.26 The study identifies a retail catchment area for the District (defined by survey zones) that extends north east out of the District to include Dorking to the north and Haywards Heath to the east. To the south it extends to include Shoreham-by-sea, and in the west, it extends to include a number of small towns including Loxwood.

3.27 In relation to convenience goods the Study reviewed the expenditure growth, shopping patterns and the performance of existing convenience goods floorspace to identify the need for additional convenience goods floorspace. The baseline capacity projections identified capacity for new convenience goods floorspace by virtue of population and expenditure growth. The analysis highlighted the strength in the performance of foodstores and Town Centre comparison goods floorspace, all of which is overtrading, and identified a need for 7,556 sq. m net of convenience goods floorspace by 2026 rising to 8,022 sq. m net by 2031.

3.28 However, the Retail Study focusses predominantly on Horsham Town Centre, rather than the wider network of centres across the District as a whole. As such, while it is useful in understanding existing shopping patterns in the wider area, including the Masterplan area, its focus is very much on Horsham rather than identifying need for additional retail in other parts of the District.

4.0 THE SEQUENTIAL TEST

4.1 This section of the Statement assesses the Proposed Development against the provisions of Paragraph 91 of the NPPF and Strategic Policy 13 of the Horsham Local Plan, which both require a sequential assessment to be undertaken for planning applications for main town centre uses which are not in an existing centre or in accordance with an up-to-date development plan.

4.2 As set out previously in this Statement, the Site is not located in an existing centre, and is not currently allocated for retail use, so it is therefore considered to be out-of-centre for all purposes of the retail assessment.

4.3 However, the Proposed Development seeks to create a comprehensive new residential neighbourhood, complete with the necessary infrastructure, services, and facilities to support the proposed residential uses. This infrastructure, including the proposed retail uses are a key part of the overall residential neighbourhood. Nonetheless, national and local policy dictates that the planning application must be accompanied by a sequential assessment to consider whether there are any more centrally located sites capable of accommodating the Proposed Development. We have therefore undertaken a sequential assessment for robustness.

4.4 It is important to note that the retail element of the Proposed Development, specifically the foodstore, will not only help to create a sustainable neighbourhood, but will also benefit the wider Ifield and Bewbush residential areas. The latest Crawley Retail Study (2020) has identified a significant need for additional convenience floorspace within the Borough, and although located just over the border in Horsham, the Proposed Development can help to meet this need in a sustainable location. It is therefore clear that there is a location-specific need, as the proposed retail offer in this location will help to support the viability of the residential uses, which cannot be achieved if these elements are disaggregated from the main residential development.

SCOPE OF THE SEQUENTIAL TEST

4.5 The PPG provides a checklist of matters for Local Planning Authorities to consider when determining applications for town centre uses in out-of-centre locations. These are as follows:

- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered;
- Where the proposal would be located in an edge-of centre or out-of-centre location, has preference been given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly;
- Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal; and
- If there are no suitable sequentially preferable locations, the sequential test is passed.

4.6 It follows that applying the sequential approach should have regard to the need, both as regards the consumer and operator, which will be met by the development. It is not an academic exercise divorced from the commercial realities of what it is that developers and landlords are seeking to supply in response to market demand. For it to have meaning, the sequential approach must be applied in a way that allows the identified need to be fully met. Applicants and local planning authorities are to demonstrate flexibility in terms of format and scale of the developments.

4.7 The PPG advises that applicants and planning authorities should consider what contribution more central sites are able to make individually to accommodate the proposal. This should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.

4.8 There have been a series of court and appeal decisions which explain the correct application of national policy relating to the sequential test. The Supreme Court in Tesco Stores v Dundee City Council [2012] UKSC 13, 21 March 2012, considered how the sequential test should be applied. It concluded that:

> *"…it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre"*

4.9 The Supreme Court was clear that a developer or retailer should not be required to materially change a development to operate in an artificial world. At Paragraph 38 of the transcript, Lord Hope states:

> *"The whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for which is something less than that sought by the developer…" "But these (*sequential assessment*) criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so".*

4.10 It is not the intention of the policy to require a developer to materially alter the proposal so it can be accommodated by an alternative site.

4.11 The Court provided further analysis in Zurich Assurance Limited (t/a Threadneedle Property Investments) V North Lincolnshire Council and Simons Developments [2012] EWHC 3708 (Admin). In the judgement, Justice Hickinbottom concluded that: *"It is also important to mark that developers, and planning authorities, work in the real world. Working in the real world, the [planning] committee were entitled (and, indeed, bound) to take into account the evidence… Marks and Spencer would not locate to Scunthorpe town centre in the event that this application for the site was refused."*

4.12 The Judgement is explicit in that it requires decision makers to take into consideration the commercial requirements and objectives of operators, developers and the wider commercial sector. Of particular relevance from the Zurich case was the acceptance that, should planning permission not be granted for the proposed development, the tenant would not occupy any of the sites that had been identified as alternatives. This accords with the principal objective of the sequential approach which is to direct development to defined centres in the first instance.

4.13 In Aldergate Properties Ltd v Mansfield District Council, the application of the policies in respect of suitability and availability, and the requirements for applicants to demonstrate 'flexibility' were considered. The Judgement states:

> *"In my judgement, "suitable" and "available" generally mean "suitable" and "available" for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in [what was then paragraph 24 of the NPPF 2012], and excludes, generally, the identity or personal or corporate attitudes of an individual retailers".*

4.14 The NPPF requires applicants to consider sequential sites that are 'available' which is defined as including sites due to become available within a 'reasonable period'. A 'reasonable period' is not defined by the NPPF or PPG but is considered to be 'reasonable' having regard for the requirement the development is intended to meet and the relevant local context.

4.15 In the Scotch Corner Secretary of State Decision in December 2016 (APP/V2723/V/15/3132873 & APP/V2723/V/16/3143678) the Inspector found:

> *"In carrying out the sequential test it is acknowledged that whilst [what was then paragraph 24 of the NPPF 2012] indicates that applicants should demonstrate flexibility on issues such as format and scale,* ***it does not require the applicant to disaggregate the scheme****. The sequential test seeks to see* ***if the application, i.e. what is proposed,*** *can be accommodated on a town centre site or on sequentially preferable sites…" (IR paragraph 11.7)*

4.16 On 1 October 2018, the Secretary of State has issued his decision in respect of development at Cribbs Causeway (APP/P0119/V/17/3170627). In that decision, the requirement for 'disaggregation' is specifically considered within the context that an explicit requirement was not re-introduced in the revised NPPF.

> *In the Tollgate Village case the Inspector did consider that there was scope for disaggregating the proposals and spreading them onto different sites, even though ultimately such sites were found not to be available.* ***However, the findings here were case specific and it is noted that they were not specifically endorsed by the Secretary of State in his decision. As a general principle an approach that involves disaggregation does not seem to me to fit well with the Aldergate Properties or Warners Retail judgements referred to above.***

4.17 In December 2014, the Communities and Local Government Committee assessed the operation of the NPPF and discussed whether disaggregation should be re-introduced into the application of the sequential approach. This was rejected by the Government and not seen as necessary, given the established policy and requirement to demonstrate 'flexibility'. The requirement to disaggregate a specific development was seen to go beyond the requirements of this policy.

4.18 It is therefore clear that there is no requirement to disaggregate a proposal into its smaller constituent parts when applying the sequential test, and when considering sequential sites, these need to be suitable for the development broadly proposed, and not an alternative hypothetical version of the proposal.

4.19 Based on the above, it is the case that:

- A site should be 'suitable' and 'available' to accommodate the full development as proposed having regard to the requirement for 'flexibility'. It is not the requirement of policy for a development to be materially altered to fit onto a more central site; and
- There is no policy requirement to consider the 'disaggregation' of a single development scheme into constituent parts.

4.20 It is clear that there is little scope to disaggregate constituent parts of the Proposed Development. All the uses are integral to the character and function of the whole mixed-use scheme and therefore cannot be disaggregated.

4.21 The Site as a whole has a site area of approximately 172 hectares. With this in mind and taking account of the Case Law set out above, the sequential test should focus on sites capable of accommodating the floorspace associated with the proposed development i.e., 172 hectares. The retail, food and beverage (F&B) and other town centre uses associated with the Proposed Development extend to a much smaller area, with a total area of 40,130 sq. m for all class E commercial uses, and a maximum of circa 5,200 sq. m (gross GEA) proposed for retail. As clearly set out above, the purpose of this floorspace is to support the remainder of the Proposed Development to help to create a sustainable community and is therefore integral to the viability of the development as a whole.

4.22 The proposed retail and other commercial and leisure uses are intended to complement the wider development and will predominantly serve the incoming residential population. Many of the trips generated to the retail provision, and turnover associated with these uses, will be derived from occupants of the proposed residential properties and users of the proposed commercial and community uses.

4.23 As such, it is neither viable nor practical to disaggregate these uses from the wider application proposals. Seeking to locate these uses elsewhere would not meet the specific customer need created by the wider uses at the Site. It therefore follows that the sequential test should focus on sites capable of accommodating the development as a whole.

4.24 Notwithstanding this, there is a requirement for both Local Authorities and developers to apply a degree of flexibility when considering the sequential test. With this in mind, in this Section we do consider opportunities for the proposed retail floorspace in isolation from the rest of the development, where appropriate, taking account of any additional space required for car parking and servicing arrangements.

4.25 Given the Site's location in the context of the wider area, the following centres have been considered as part of the sequential test in this instance are:

- Crawley Town Centre; and
- Broadfield Neighbourhood Centre.

4.26 The above locations are the only centres of a scale to potentially accommodate the development. We consider both locations in turn below.

ASSESSMENT OF ALTERNATIVE SITES

CRAWLEY TOWN CENTRE

4.27 The site visit from February 2025 identified that that there are a number of vacant units within Crawley Town Centre, spread across the centre as a whole, with the largest vacancy being the former Debenhams unit in County Mall at 3,150 sq. m across three levels.

4.28 Although vacant, the unit does not appear to be advertised as being available to let. In any event, the unit would not provide sufficient floorspace for the retail uses associated with the development, nor would the layout across three floors within a covered shopping centre be suitable for the type of retail proposed by the application.

4.29 As set out in detail above, the purpose of the retail floorspace is to help create a sustainable neighbourhood for the residential uses coming forward at part of the wider development. By locating the floorspace in Crawley Town Centre, away from the rest of the development, this clear location-specific need would not be met.

4.30 Therefore, notwithstanding the fact that the unit is not currently being marketed and does not provide sufficient floorspace, it would also not be appropriate to locate the floorspace within the Town Centre, away from the rest of the development. The unit can therefore be discounted for the purposes of the sequential test. It therefore follows that there are no suitable units available to accommodate the Proposed Development in Crawley Town Centre

4.31 In terms of development sites, the adopted Crawley Local Plan 2023 – 2040 identifies the seven 'Town Centre Key Opportunity Sites' areas which will help to enhance town centre vitality and viability and help to meet the economic and housing needs of the borough, as noted in Section 3. These are set out below.

- **Telford Place, Three Bridges** – measures approximately 0.55 ha, has been identified as an area for mixed use, residential led scheme, delivering approximately 300 new homes and 370 sq. m of commercial floorspace. It was previously used as a temporary car park.

- **Crawley Station and Car Park** – measures approximately 0.9 ha, has been identified as an area that could establish a new gateway to the Town Centre, providing high quality living space and new commercial space;

- **County Buildings** – measures approximately 1.04 ha, has been identified as an area that could create a new self-contained town centre quarter, promoting mixed use development including a mix of commercial (offices) and residential uses. The Council aim to use 75% of the site for housing and 25% for offices;

- **Land North of the Boulevard** – measures approximately 1.23 ha and has been identified as an area that could establish a new gateway to the Town Centre, providing high quality living space and new commercial space. Planning permission was approved on the site in February 2019 for the demolition of the existing council offices and civic hall and the erection of a new town hall, offices and public square, along with 182 units of residential units including commercial space;

- **Crawley College** - comprises the existing College facility and it has been identified by the Council as an area that could be utilised for mixed use development with a priority for education;

- **Cross Keys** – comprises an arrangement of intertwined small sites which traverse the block created by the High Street in the west and The Broadway in the east, Pegler Way in the south and Board Walk in the north. Cross Keys connects High Street with The Broadway in a zig zag fashion. The Council's vision is to establish the area as a vibrant part of the Town Centre though the activation of unused areas; and

- **Former MOKA Nightclub** - measures approximately 1.04 ha, has been identified for a residential led mixed use development delivering up to 650 sq. m of ground floor commercial floorspace, split between 2 to 4 units.

4.32 Given the scale of development proposed by this Planning Application, none of the sites are large enough to accommodate either the development, or the retail floorspace in isolation, even before taking account of the associated parking and servicing arrangements. Further, in line with the above, by separating the proposed retail floorspace from the rest of the development, the location specific need to create a sustainable neighbourhood, with retail provision to meet the day-to-day needs of residents will not be met.

4.33 Additionally, the Council's vision for each of the seven sites identified above differ considerably to that proposed by the application proposal. Crucially it is not envisioned that any of the sites will accommodate the level of retail floorspace proposed by the Development.

4.34 It therefore follows that there are no vacant units or potential development sites either in or on the edge of Crawley Town Centre capable of accommodating the development proposals. We therefore conclude that the sequential test is passed in respect of Crawley Town Centre.

BROADFIELD NEIGHBOURHOOD CENTRE

4.35 Broadfield Neighbourhood Centre is located to the north of Crawley Town Centre, circa 3.4km east of the boundary of the Site. The site visit from February 2025 identified no vacant units within Broadfield Neighbourhood Centre.

4.36 Additionally, there are no potential development sites either within or on the edge of Broadfield Neighbourhood Centre that would be capable of accommodating the Proposed Development. Therefore, we conclude that the sequential test is passed in respect of Broadfield Neighbourhood Centre.

SUMMARY OF SEQUENTIAL ASSESSMENT

4.37 The sequential assessment has considered whether there are any more centrally located sites that are available and capable of accommodating the development proposals as a whole.

4.38 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. It therefore follows that the application site is the most sequentially preferable location for the Proposed Development.

4.39 This assessment concludes that the application site is the most sequentially preferable site to accommodate the Proposed Development, and it accords with the adopted Strategic Policy 13 of the Horsham District Local Plan and Paragraph 91 of the NPPF.

5.0 THE IMPACT ASSESSMENT

INTRODUCTION

5.1 **Paragraph 94** of the NPPF states that when assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the national default threshold is 2,500 sq. m.

5.2 Policy 6 of the adopted Horsham District Local Plan sets a threshold of 2,500 sq. m. However, as the planning application proposes up to 5,200 sq. m GEA of retail floorspace, an impact assessment is required in any event to be submitted alongside the application in line with local and national planning policy.

5.3 Paragraph 94 of the NPPF confirms that impact assessments should include an assessment of:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

5.4 The Planning Practice Guidance (PPG) sets out a checklist for applying the impact test[2], and notes that the following steps need be taken:

- establish the state of existing centres and the nature of current shopping patterns (base year);
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;
- examine the ‘no development’ scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal’s turnover and trade draw* (drawing on information from comparable schemes, the operator’s benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw);
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact);
- set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues; and

[2] Paragraph: 018 Reference ID: 2b-018-20190722

- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences for the vitality and viability of existing town centres.

5.5 The PPG confirms that a judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. Where evidence shows that there would be no likely significant impact on a town centre from an edge-of-centre or out-of-centre proposal, the local planning authority must then consider all other material considerations in determining the application, as it would for any other development.

5.6 The design year for impact testing will need to be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after the opening of each phase of a new retail development, but it may take longer for some developments to become established. Based on the target development timeline, we have taken the Design Year as 2033. We have also included a Horizon Year of 2036 which assess the impact once the development has had an opportunity to establish itself, as well as 2041, once the Proposed Development has been completed.

5.7 In this Section, we have considered how much expenditure for both convenience (food) and comparison (non-food) will be generated as a result of the wider residential development. We then set out the anticipated turnover of the proposed retail uses, taking account of the planned phasing of the development over the period up to 2041.

5.8 The full retail tables referred to in this section are contained in **Appendix 1** of this Statement.

RETAIL EXPENDITURE GENERATED BY THE DEVELOPMENT PROPOSALS

5.9 The Proposed Development will deliver approximately 3,000 residential units, with a mix of terraced, semi-detached, garden maisonettes, upper duplex and apartments. They will range in size from one-bed flats to 4+ bed houses.

5.10 For the purposes of this Report, we have assumed a total population of 6,725 by the end of the development in 2041.

5.11 Taking account of the anticipated population, it is possible to understand how much retail expenditure will be generated by the development. There will also be spend associated with the other uses, such as the schools and employment which are likely to be used by those travelling in from outside. However, to be robust for the purposes of this assessment, we have assumed retail spend linked to the residential population only.

5.12 The Site falls within Zone 1B of the Crawley Retail Study Area, which covers most of the urban area of Crawley, save for the Town Centre, which is in Zone 1A. The majority of Horsham Borough falls within Zone 5. Although located within Horsham, given that the Site will effectively act as an urban extension to Crawley, we have adopted the per capita expenditure figures for Zone 1A and 1B for the purposes of this Report.

5.13 Table 5.1 below sets out the anticipated comparison and convenience expenditure likely to be generated by the residential uses up to 2041. This assumes that approximately 17% of the 3,000 units will have been completed and occupied by 2033, with 50% of the units being completed and occupied by 2036, and 100% of the units being completed and occupied by 2041, in line with the planned development programme.

Table 5.1 – Estimated Total Retail Expenditure Generated the Development (Inc. SFT) (£m)

Type	2033 (17%)	2036 (50%)	2041 (100%)
Comparison Goods	£5.84	£18.91	£43.01
Convenience Goods	£2.11	£6.29	£12.46
Total Expenditure	**£7.95**	**£25.21**	**£55.47**

5.14 This shows that, by 2036, the residential uses that have been completed and occupied could generate approximately £25.21m of expenditure for convenience and comparison goods. Please note that this is a simplistic view, being the level of turnover that the Masterplan area could support arising from the development of the residential units, assuming no in or outflow of trade. However, it is useful in understanding the level of floorspace which could be supported by the residential without impacting the wider shopping patterns.

5.15 This expenditure would be in addition to the identified capacity for additional convenience and comparison goods floorspace set out in the Crawley Retail Study, as noted earlier in this Report. Based on the findings of the Study, this would bring the total amount of surplus expenditure for convenience goods within Crawley to £82.8m by 2035 and for comparison goods to £273.2m. This is in addition to any need identified in Horsham District itself.

ESTIMATED TURNOVER OF RETAIL FLOORSPACE

5.16 As set out in Section 2, the supporting application documents set the quantum of Class E Retail and other supporting town centre uses which are expected to be provided within the Proposed Development. This Statement focuses primarily on the planning policy implications of the proposed retail uses contained in the foodstore and the local shops.

5.17 **Tables 5.2 and 5.3** below set out the anticipated convenience and comparison turnover of the proposed retail floorspace up to 2041. This assumes that all of the retail floorspace associated with the Proposed Development will have been delivered by the end of 2033.

Table 5.2 – Estimated Turnover of Convenience Goods Floorspace

Use	Size (sq. m) (GEA)	Size (sq. m) (GIA)	Net Sales (sq. m)	Convenience Floorspace		Sales Density	Turnover (£m)		
				%	sq. m		2033	2036	2041
Convenience Retail (Foodstore)	1,900	1,805	1,264	72.5%	916	12,968	£11.97	£12.01	£12.07
Comparison Retail (Local Shops)	3,300	3,135	2,508	15%	376	8,000	£2.72	£2.73	£2.74
TOTAL	**5,200**	**4,940**	**3,772**	**-**	**1,292**	-	**£14.70**	**£14.74**	**£14.81**

Table 5.3 – Estimated Turnover of Comparison Goods Floorspace

Use	Size (sq. m) (GEA)	Size (sq. m) (GIA)	Net Sales (sq. m)	Convenience Floorspace		Sales Density	Turnover (£m)		
				%	sq. m		2033	2036	2041
Convenience Retail (Foodstore)	1,900	1,805	1,264	15%	190	12,968	£2.48	£2.49	£2.50
Comparison Retail (Local Shops)	3,300	3,135	2,508	50%	1,254	6,500	£10.31	£11.10	£12.56
TOTAL	**5,200**	**4,940**	**3,772**	**-**	**1,444**	**-**	**£12.79**	**£13.59**	**£15.05**

5.18 **Tables 5.2** above shows that the retail floorspace of the development could have a convenience turnover of approximately **£14.74m** at 2036, the majority of which will be associated with the foodstore. The sales density assumptions for the foodstore have been based on an average of six food stores (Aldi, Lidl, Sainsbury's, Morrisons, Tesco and Asda), taken from Global Data 2024.

5.19 **Tables 5.3** shows that the retail floorspace of the development could also have a comparison goods turnover of **£13.59m** at 2036, the majority of which is associated with the local shops. It also sets out the anticipated breakdown of the proposed local shops. The assumptions relating to the anticipated net sales are and proportion of convenience and comparison floorspace for the foodstore and convenience store are based on figures contained in the Crawley Retail Study and the floorspace has a net to gross ratio of 70%.

5.20 In terms of the local shops, a gross to net ratio of 80% has been adopted. It is also assumed that only 15% of the floorspace is likely to be for convenience goods, for example a newsagent, butcher, bakery etc. It is estimated that a further 50% of the floorspace could be used for the sale of comparison goods. The remaining 35% will be used for ancillary retail services, such as hairdressers and beauty salons, and other supporting uses.

5.21 It is also important to note that the turnover of the retail floorspace as a whole is far below the identified need for retail floorspace within Crawley, as recognised by the Crawley Retail Study. Although there is no longer a policy requirement to demonstrate the need for a development, this confirms that there is more than sufficient expenditure to support the development, both identified through the Retail Study in addition to the expenditure generated by the Proposed Development, without a significant adverse impact on the current trading performance of existing stores.

5.22 Notwithstanding the above, in accordance with Paragraph 94 of the NPPF and adopted Strategic Policy 6 of the Horsham Local Plan, it is necessary to consider the potential diversion of trade from the existing stores and centres identified in Section 2 and assess whether any diversion could lead to an impact that could be considered to be 'significant'.

5.23 For the purposes of this Statement, we have assumed that most of the trade to the proposed retail floorspace will be diverted from the existing stores in the wider area, based upon their current trading performance. This is a robust approach and therefore assumes that the majority of those who will be living in the proposed residential would otherwise be living in the wider Crawley area, using existing local facilities.

5.24 At the time of the Household Survey for the Crawley Retail Study, the former Morrisons, Sainsbury's and Marks & Spencer stores in the Crawley Town Centre were still trading and therefore attracted a turnover from the total available expenditure. Following the closure of these stores this expenditure will have been redistributed to stores in the wider area, most likely to the larger foodstore including Asda on Peglar Way, Sainsbury's at Crawley Avenue and Tesco Extra at Hazelwick Avenue, as well as the other Town Centre convenience stores. For the purposes of this Statement, we have therefore made an assumption about the redistribution of the expenditure from these former stores in Crawley Town Centre to stores in the wider area.

5.25 Due to the phased delivery of the residential units, it is anticipated that the trade draw to both the comparison and convenience floorspace will change over time as more new residents move to the area from outside of the catchment, as well as passing trade from the community uses which form part of the Proposed Development.

5.26 In order to present this, the impact tables have assessed two scenarios in regard to the trade diversion of both comparison and convenience floorspace. **Scenario 1** considers that just up to 5% of the turnover of both comparison and convenience floorspace would be diverted from stores outside of the catchment area across the entire assessment period. In terms of convenience diversion, this equates to £0.73m in 2033 and rises to £0.74m in 2036, and £0.74m in 2041. In terms of comparison, this equates to approximately £0.64m in 2033 and rises to £0.68m in 2036 and £0.75m in 2041.

5.27 **Scenario 2** takes a more realistic approach by considering the phasing of residential units. This scenario suggests that in 2033 up to 10% of the turnover will be diverted from stores outside the catchment area, with the figure increasing to up to 25% in 2036, and to 50% in 2041. This projection aligns with the expected delivery of residential units, with 17% of units anticipated to be delivered by 2033 and 50% by 2036 and 100% by 2041. This assumes that some, although not all, of new residents at the Site will have moved in from outside the immediate Crawley area. In terms of convenience diversion, this equates to £1.47m in 2033 and rises to £3.69m in 2036 and £7.41m in 2041. In terms of comparison diversion, this equates to approximately £1.28m in 2033 and rises to £3.40m in 2036 and £7.52m in 2041.

5.28 **Table 5.4** below sets out the potential impact on existing stores and centres as a result of trade diversion to the proposed convenience floorspace at **Scenario 1.** The tables only include stores where it is expected that trade could be diverted from. The full tables are included at Tables 7, 9 and 11 of **Appendix 1**. The rates of diversion have been based on the assumption that the majority of trade to the proposed foodstore will be diverted from similar type stores, including the Sainsbury's store on Crawley Avenue, Aldi at the Acorn Retail Park and Asda on Peglar Way, and to a lesser extent the Tesco Extra and Lidl stores on Hazelwick Avenue.

Table 5.4 – Convenience Impact at 2033, 2036 & 20241 – 'Scenario 1'

Store / Centre	£ Diversion 2033	£ Diversion 2036	£ Diversion 2041	Impact 2033	Impact 2036	Impact 2041
Iceland, The Pavilion Centre, Queens Square, Crawley	£0.26	£0.26	£0.26	4.88%	4.79%	4.63%
Co-op, Bewbush	£0.11	£0.11	£0.11	4.48%	4.40%	4.26%
Iceland, Broadfield Barton, Crawley	£0.11	£0.11	£0.11	3.22%	3.16%	3.06%
Tesco Express, Ifield	£0.11	£0.11	£0.11	3.97%	3.89%	3.77%
Co-op, Langley Parade	£0.11	£0.11	£0.11	1.20%	1.18%	1.14%
Asda, Pegler Way, Crawley	£3.09	£3.10	£3.11	5.02%	4.92%	4.77%
Aldi, Acorn Retail Park, Betts Way	£2.20	£2.21	£2.22	7.13%	6.99%	6.77%

Iceland, Haslett Avenue	£0.11	£0.11	£0.11	4.13%	4.05%	3.92%
Lidl, Hazelwick Avenue, Crawley	£0.73	£0.74	£0.74	3.53%	3.47%	3.35%
Marks & Spencer Foodhall, Betts Way	£0.15	£0.15	£0.15	2.09%	2.05%	1.99%
Sainsbury's Superstore, Crawley Avenue	£3.60	£3.61	£3.63	5.47%	5.36%	5.19%
Tesco Express, Betts Way	£0.15	£0.15	£0.15	1.91%	1.87%	1.81%
Tesco Express, Downland Drive	£0.15	£0.15	£0.15	3.35%	3.29%	3.18%
Tesco Extra, Hazelwick Avenue,	£2.94	£2.95	£2.96	2.89%	2.83%	2.74%
Other, Zone 1b	£0.15	£0.15	£0.15	3.27%	3.21%	3.11%
Outside Crawley Zones 1a and 1b	£0.73	£0.74	£0.74			
TOTAL	**£14.70**	**£14.74**	**£14.81**			

5.29 With the exception Iceland in Crawley Town Centre and Asda, which is located on the edge of Crawley Town Centre, all of the other stores are located out-of-centre and are therefore afforded no policy protection in terms of diversion of trade. All of the main foodstores are also trading well above their company benchmark turnover, as evidenced by **Table 6** of Appendix 1.

5.30 We have assumed that some trade could be diverted from Neighbourhood Centres located close to the Site. Given the relatively small turnover of the existing convenience stores in these centres, any diversion of trade has the potential to give rise to a high impact in percentage terms. However, it is important to consider the impact on these stores in the wider context of the Neighbourhood Centre and the other retail and community uses they provide. As such, a direct impact of up to 10% on a single store in these centres may not give rise to a significant adverse impact when considering the overall function of a centre as a whole, and their relative health as identified earlier in this Statement.

5.31 **Table 5.4** confirms that the convenience floorspace could lead to a 4.40% direct impact on the convenience turnover of the Co-Op store at Bewbush, a 3.89% direct impact on the Tesco Express in Ifield, and a 3.29% direct impact on the Tesco Express at Downland Drive at 2036.

5.32 In **Scenario 2,** which is shown at Table 8, 10 and 12 of **Appendix 1**, and is considered a more realistic scenario, shows that convenience floorspace could lead to a much lower direct impact of 2.93% on the convenience turnover of the Co-Op store at Bewbush, a 2.59% direct impact on the Tesco Express in Ifield, and a 2.47% direct impact on the Tesco Express at Download Drive at 2036.

5.33 **Table 5.5** below sets out the anticipated trade diversion and subsequent impact related to the proposed comparison floorspace at **Scenario 1**. Much of this floorspace relates to the local shops as well as the comparison floorspace within the foodstore, and therefore trade will most likely be diverted from similar retailers. The type of comparison retailers associated with the smaller format units is not yet known, so we have assumed that these will be a mix of typical town centre retailer and those that may be found in smaller centres.

Table 5.5 – Comparison Impact at 2033, 2036 and 2041 – 'Scenario 1'

Store / Centre	£ Diversion 2033	£ Diversion 2036	£ Diversion 2041	Impact 2033	Impact 2036	Impact 2041
Crawley Town Centre	£2.56	£2.72	£3.01	0.47%	0.45%	0.42%
Broadfield Local Centre	£0.03	£0.03	£0.04	3.98%	3.83%	3.60%
Asda, Pegler Way,	£1.66	£1.77	£1.96	7.91%	7.61%	7.15%
Acorn Retail Park	£1.28	£1.36	£1.51	1.96%	1.88%	1.77%

County Oak Retail Park	£1.73	£1.83	£2.03	0.52%	0.50%	0.47%
Lidl, Hazelwick Avenue,	£0.35	£0.37	£0.41	9.06%	8.72%	8.19%
Sainsbury's Superstore, Crawley Avenue	£2.69	£2.85	£3.16	11.13%	10.71%	10.06%
Tesco Extra, Hazelwick Avenue	£1.60	£1.70	£1.88	8.13%	7.82%	7.34%
Other, Zone 1B	£0.26	£0.27	£0.30	2.69%	2.59%	2.43%
Outside Crawley Zones 1a and 1b	£0.64	£0.68	£0.75			
TOTAL	**£12.79**	**£13.59**	**£15.05**			

5.34 The impact on the comparison turnover of Crawley Town Centre is likely to be negligible, at just 0.45% at 2036. The highest comparison impacts are likely to be on the out of centre Sainsbury's store on Crawley Avenue (10.71%), the Asda store on the edge of Crawley Town Centre (7.91%), the out of centre Lidl store at Hazelwick Avenue (9.06%) and the Tesco Extra store at Hazelwick Avenue (8.13%), all of which are currently overtrading. It should be noted that these stores do not have any protection in policy terms.

5.35 In **Scenario 2,** the impact on the comparison turnover of Crawley Town Centre is less than Scenario 1 at just 0.31% at 2036. The impact on the out of centre Sainsburys store on Crawley Avenue (9.18%), the Asda store on the edge of Crawley Town Centre (4.69%), the out of centre Lidl store at Hazelwick Avenue (6.34%) and the Tesco Extra store at Hazelwick Avenue (7.66%) are also less than Scenario 1.

5.36 **Table 5.6** below sets out the potential impact on the centres identified in **Tables 5.4 and 5.5** above in terms of each centre as a whole, including all convenience and comparison floorspace, but excluding any retail services or other ancillary uses.

5.37 The current turnover of the centres is derived from the Household Survey undertaken to support the Crawley Retail Study. It is important to note that these types of surveys tend to underestimate the turnover of smaller stores and centres. For example, the Household Survey does not attribute any expenditure to any stores at Bewbush, Ifield or Langley apart from the Co-Op stores, despite the fact that they all provide other convenience and comparison uses. In fact, of all the Neighbourhood Centres which could be affected by the proposed development, the Retail Study only provides a comparison turnover for Broadfield, which is itself is likely to be an underestimation given the rage of shops in the centre. As such, it is important to recognise the potential impact on these centres has the potential to be overestimated as a result.

Table 5.6 – Combined Impact at 2033, 2036 and 2041- Scenario 1

Destination	Impact 2033	% of 2025 Turnover	Impact 2036	% of 2025 Turnover	Impact 2041	% of 2025 Turnover
Crawley Town Centre	0.51%	128.48%	0.49%	141.82%	0.46%	167.22%
Bewbush Neighbourhood Centre	4.50%	101.60%	4.40%	104.02%	4.26%	108.17%
Broadfield Barton, Crawley	3.37%	106.40%	3.30%	110.56%	3.18%	118.11%
Ifield, Crawley	3.97%	102.16%	3.89%	104.58%	3.77%	108.72%
Langley Parade, Crawley	1.21%	104.32%	1.18%	107.53%	1.14%	111.69%
Tilgate Parade, Crawley	0.00%	107.15%	0.00%	109.94%	0.00%	114.82%
Downland Drive, Crawley	3.35%	102.81%	3.29%	105.23%	3.18%	109.38%

5.38 **Table 5.6** shows that at 2033 under Scenario 1, the proposed retail floorspace could result in up to a 4.50% direct impact on the turnover of Bewbush Neighbourhood Centre and 3.97% on Ifield. However, as noted above the total turnover of these centres is likely to have been underestimated by the findings of the household survey. It is also important to recognise the role the anticipated growth in expenditure is likely to play, with all centres trading above their 2025 turnovers at 2033. The impact under Scenario 2 is less, as set out in **Tables 21a, 21b and 21c** of Appendix 1 and summarised in **Table 5.7** below. This confirms that he potential impact under this more realistic scenario are much lower.

Table 5.7 – Combined Impact at 2033, 2036 and 2041- Scenario 2

Destination	Impact 2033	% of 2025 Turnover	Impact 2036	% of 2025 Turnover	Impact 2041	% of 2025 Turnover
Crawley Town Centre	0.52%	128.47%	0.34%	142.04%	0.30%	167.49%
Bewbush Neighbourhood Centre	4.48%	101.61%	2.93%	105.62%	1.70%	111.05%
Broadfield Barton, Crawley	3.06%	106.16%	2.46%	111.52%	1.75%	119.85%
Ifield, Crawley	3.97%	102.16%	2.59%	105.99%	1.51%	111.27%
Langley Parade, Crawley	1.20%	105.11%	0.78%	107.95%	0.46%	112.46%
Tilgate Parade, Crawley	0.00%	107.15%	0.00%	109.94%	0.00%	114.82%
Downland Drive, Crawley	3.35%	102.81%	2.47%	106.12%	1.59%	111.18%

5.39 **Tables 5.6 and 5.7** clearly demonstrate that the potential impact from the development on the existing centres, including Crawley Town Centre, is likely to be negligible. The potential impact of the Neighbourhood Centres also needs to be considered in light of their overall health, as assessed in Section 2 of this Statement, which concludes that all of the centres are performing their role well and are generally in good health.

5.40 The largest impact in could be on Bewbush, with a direct impact in a single year of 4.50% at 2033, decreasing to 4.40% by 2036 and to 4.26% in 2041 at Scenario 1. In Scenario 2, this direct impact in a single year would decrease from 4.48% in 2033 to 2.93% in 2036 and to 1.70% in 2041. However, the impact also needs to be considered in the wider context of the other services it provides which have not been attributed a monetary value within the Retail Study, for example retail services and community uses. Bewbush for example accommodates a range of educational and community uses, including a children and family centre, a nursery and a school, which will continue to drive footfall in the centre.

5.41 Further, although the growth rates used in the retail assessment assume a certain amount of population growth, it does not take into account the population growth associated with the Proposed Development. It is also important to note that the purpose of the new Neighbourhood Centre will be to support the new population moving into the Proposed Development, creating a sustainable neighbourhood, rather than to divert trade from other Neighbourhood Centres and stores in the wider area.

5.42 As identified earlier in the Report, all the proposed comparison floorspace and most of the convenience floorspace can be fully supported in terms of their proposed turnover by those living within the Proposed Development. As such, the impact on other stores and centres within the wider area in reality is likely to be minimal. Although trade to both the foodstore and local shops will inevitably draw some trade from beyond the immediate area, in the same way, spend generated from the Proposed Development will also be spent elsewhere, creating a positive benefit of the development.

5.43 Taking this into account, we conclude that the retail element of the development will not lead to a significant adverse impact on the town centre vitality and viability of any centre. With this in mind and given that the expenditure generated by the Development is more than sufficient to support the floorspace, the development will not impact on the ability for any existing, planned or proposed floorspace to come forward.

5.44 We therefore conclude that the development complies with Paragraphs 90-95 of the NPPF and Strategic Policy 6 of the Horsham Local Plan.

OTHER COMMERCIAL USES

5.45 The primary focus of this Statement is to assess the acceptability of the retail floorspace associated with the Proposed Development, namely the convenience and comparison floorspace contained within the foodstore and the local shops. However, both the Paragraph 94 of the NPPF and Strategic Policy 6 of the Horsham Local Plan are concerned the impact of leisure uses in addition to retail.

5.46 The Proposed Development includes a range of other uses within the proposed Neighbourhood Centre, including café and restaurant uses within Class E. Up to 40,130 sq. m of Class E commercial, business and service floorspace is proposed across the Site as a whole, including retail, food and beverage uses, leisure, health services, an early years facility and other commercial uses. All of this floorspace has been designed to be of a scale to support the residential development and will therefore not impact upon existing facilities in the wider area.

5.47 In terms of the proposed café and restaurant uses, currently, no minimum area is proposed. However, it is anticipated that this floorspace will be spread over a number of units and will be designed to meet the day-to-day needs of the immediate residential population as well as those using other services in the Neighbourhood Centre, including the schools, the health centre the community centre and the leisure facility. They will therefore not compete with existing facilities in the nearby Neighbourhood Centres or Crawley Town Centre which serve a different catchment and need and will therefore not lead to a significant adverse impact on any centre.

IMPACT OF THE PROPOSAL ON EXISTING, COMMITTED AND PLANNED PUBLIC AND PRIVATE INVESTMENT

5.48 In the context of the NPPF, it is also important to consider what impact proposals will have on any existing, committed or planned public and private investments within defined centres.

5.49 With regard to the Proposed Developments impact on existing investment, i.e. investment already made, this is addressed through our quantitative impact assessment, which is set out above in relation to the impact on town centre vitality and viability. The quantitative impact assessment demonstrates that the level of trade diversion from any defined centre is minimal and not at a level that could be considered to impact on existing investment significantly adversely in the centres.

5.50 In regard to committed and planned public and private sector investment, the Crawley Local Plan identifies seven Key Opportunity Sites within Crawley Town Centre for redevelopment to enhance town centre vitality and viability, and which have the potential to meet the economic and housing need within the Borough, as follows:

- Telford Place, Three Bridges;
- Crawley Station and Car Parks;
- County Buildings;

- Land North of the Boulevard;
- Crawley College (mixed use development with priority for education);
- Cross Keys; and
- Former MOKA nightclub

5.51 The adopted Crawley Local Plan confirms that on these sites, development will be supported where it is for either main town centre uses, or mixed-use development for residential and main town centre uses and/or town centre neighbourhood facilities. The scale and type of development anticipated for these sites differs considerably from what is proposed at West of Ifield. Further, although some additional retail floorspace of proposed, it is not of the scale associated with the Proposed Development.

5.52 The quantitative impact assessment has demonstrated that the Proposed Development will not lead to a significant diversion of trade from the Town Centre. It therefore follows that the Proposed Development will not lead to a significant adverse impact on the ability for the above sites to come forward for development in due course.

5.53 As demonstrated previously in this Section, the Proposed Development will not lead to a level of trade diversion from Crawley Town Centre which could impact on the ability for these sites to come forward. It follows that the proposals will not lead to an adverse impact on any existing or future investment.

CONCLUSION ON IMPACT

5.54 The impact assessment confirms that the Proposed Development will not have a ‘significant adverse impact’ on the vitality and viability of any defined centre, or on any planned investments. We therefore conclude that the Proposed Development satisfies the requirements of the impact assessment, and it follows that the proposals accord with Paragraph 94 of the NPPF and Policy 6 of the adopted Horsham District Local Plan.

6.0 SUMMARY AND CONCLUSIONS

6.1 This Retail Assessment has been prepared in support of an application for that seeks development will provide a strategic development of approximately 3,000 residential units alongside a range of supporting uses, including schools, community uses, a new road network and cycleways, employment and retail.

6.2 The Proposed Development aims to create a comprehensive new residential neighbourhood, with the necessary infrastructure, services, and facilities to support the residential uses. The proposed retail floorspace is a key part of the overall masterplan and is intended to serve and support the overall development. The retail units will comprise a mid-sized foodstore alongside small scale local shops to support the day-to-day needs of those living and working at the Site.

6.3 Given the location of the application site in the wider context, this Statement has assessed the impact of the Proposed Development on Crawley Town Centre, alongside a range of Neighbourhood Centres located close to the Site. It has also considered whether any more sequentially preferable sites are available and suitable to accommodate the proposals.

6.4 The sequential assessment undertaken in support of this application concludes that the application site is the most sequentially preferable site to accommodate the Proposed Development and accords with Strategic Policy 13 of the Horsham District Local Plan and Paragraph 91 of the NPPF.

6.5 In regard to Retail Impact, we have considered where the trade to the new retail floorspace forming part of the Proposed Development is likely to be diverted from, and the resultant impact on nearby existing stores and centres. Given the relationship with the Site and the network of centres within Crawley Borough, it is anticipated that the majority of trade will be diverted with from stores within Crawley, rather than from Horsham District.

6.6 The main conclusions of the Retail 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. In addition, the Crawley Retail Study identifies a significant need for additional comparison and convenience goods floorspace by 2036, in addition to any identified need for additional floorspace within Horsham;

- Scenario 1 of the assessment has considered a robust approach in that 95% of trade will be diverted from stores within Crawley, with 5% coming from elsewhere. This is based on the robust assumption that the vast majority of those using the new floorspace would otherwise have been using stores within the local area. It is however considered that Scenario 2 is more realistic, in that more trade will be diverted from stores outside the immediate catchment area, thus reducing any perceived impact on existing stores and centres within the catchment area. Scenario 1 should therefore be viewed as 'worst case';

- Under Scenario 1, the Proposed Development would not lead to an impact on any designated centre that could be considered 'significant'. Under Scenario 2, which is considered a more realistic scenario, the potential impact experienced on the designated centres would be reduced further. The development will also result in no impact on planned investment; and

- The sequential assessment concludes that the application site is the most sequentially preferable site to accommodate the Proposed Development and accords with Strategic Policy 13 of the Horsham District Local Plan, and Paragraph 91 of the NPPF.

6.7 Accordingly, we conclude that the application fully accords with both national and local retail planning policy and should therefore be considered favourably by Horsham District Council.

APPENDIX 01
IFIELD RETAIL TABLES

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 1 - Estimated Population

Residential Units	Total Population
3,000	6,725

NOTES
1- Residential Units and Total Population taken from Crib Sheet document.

Table 2 - Estimated Retail Expenditure Per Capita - based on Zone 1B including SFT

	2033	2036	2041
Comparison Goods	5,208	5,625	6,395
Convenience Goods	1,883	1,871	1,853

Notes
1. Application Site falls with Study Zone 1B of the Crawley Retail Study 2020. Anticipated Expenditure assumed to be as Zone 1B as set out In Tables 1, 7a and 7b of Appendix D of the Retail Study
2. All figures include SFT
3. Figures taken from Retail Study. Grown in accodance with Tables 1a and 1b of Experian Retail Planner Briefing Note 22 (March 2025)

Table 3a -Estimated Total Retail Expenditure Generated by Development - Including SFT

	2033	2036	2041
Comparison Expenditure	£35.03	£37.83	£43.01
Convenience Goods	£12.66	£12.58	£12.46
Total Expenditure	£47.69	£50.41	£55.47

Notes
1. Does not include phasing of development

Table 3b -Estimated Total Retail Expenditure Generated by Development - Exclduing SFT

	2033	2036	2041
Comparison Expenditure	£25.60	£27.27	£30.41
Convenience Goods	£9.25	£9.07	£8.81
Total Expenditure	**£34.86**	**£36.35**	**£39.22**

Notes
1. Does not include phasing of development

Table 4a -Estimated Total Retail Expenditure Generated by Development Phased - Includuing SFT

	2033 (17%)	2036 (50%)	2041 (100%)
Comparison Expenditure	£5.84	£18.91	£43.01
Convenience Goods	£2.11	£6.29	£12.46
Total Expenditure	**£7.95**	**£25.21**	**£55.47**

1. Includes phasing of development

Table 4b -Estimated Total Retail Expenditure Generated by Development Phased - Exclduing SFT

	2033 (17%)	2036 (50%)	2041 (100%)
Comparison Expenditure	£4.27	£13.64	£30.41
Convenience Goods	£1.54	£4.54	£8.81
Total Expenditure	**£5.81**	**£18.17**	**£39.22**

1. Includes phasing of development

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 5a - Estimated Turnover of Retail Floorspace - Convenience Goods

Use	Size (sq. m) (GEA)	Size (sq. m) (GIA)	Net Sales (sq. m)	Convenience Floorspace		Sales Density	Turnover (£m)		
				%	sq. m		2033	2036	2041
Convenience Retail (Foodstore)	1,900	1,805	1,264	72.50%	916	12,968	£11.97	£12.01	£12.07
Comparison Retail (Local Shops)	3,300	3,135	2,508	15.00%	376	8,000	£2.72	£2.73	£2.74
TOTAL	**5,200**	**4,940**	**3,772**		**1,292**		**£14.70**	**£14.74**	**£14.81**

Notes:

1. Sales Density of Foodstore assumed to be average of Aldi, Lidl. Sainsbury's, Morrisons, Tesco and Asda at 2023. Sales densities taken from Global Data 2024. 2024 Figiure.
2. Sales Density of Local Shops assumed to be £8,000 per sq. m at 2021 in line with Table 6c of Appendix D of Crawley Retail Study
3. % of convenience floorspace based on Table 5 of Appendix D of Crawley Retail Study 2020
4. Montagu Evans estimate for % of net sales based on Table 5 of Appendix D of Crawley Retail Study 2020
5. Grown from 2020 to 2041 in accordance with growth in sales efficiency as set out in Table 3a of the Experian Retail Planner Briefing Note 22 (March 2025)

Table 5b - Estimated Turnover of Retail Floorspace - Comparison Goods

Use	Size (sq. m) (GEA)	Size (sq. m) (GIA)	Net Sales (sq. m)	Comparison Floorspace		Sales Density	Turnover (£m)		
				%	sq. m		2033	2036	2041
Convenience Retail (Foodstore)	1,900	1,805	1,264	15.0%	190	12,968	£2.48	£2.49	£2.50
Comparison Retail (Local Shops)	3,300	3,135	2,508	50.0%	1,254	6,500	£10.31	£11.10	£12.56
TOTAL	**5,200**	**4,940**	**3,772**		**1,444**		**£12.79**	**£13.59**	**£15.05**

Notes:

1. Assumes 35% of Local shops will be retail services and ancillary retail uses not selling convenience or comparison goods
2. Sales efficiency of Local Shops grown in accordance with growth in sales efficiency as set out in Table 3a of the Experian Retail Planner Briefing Note 22 (March 2025)
3. Growth in Sales efficiency taken as convenience growth for comparison element of foodstore
4. Sales Density of Local Shops assumed to be be £6,500 per sq. m at 2021 in line with Table 26c of Appendix D of Crawley Retail Study

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 6: Turnover of Convenience Stores - 2033, 2036 and 2041

Destination	Gross Floorspace (sq. m)	Net Sales Area (sq. m)	Net area (sq. m) %	Net Convenience Sales Area (sq. m)	% Net Convenience	Sales Density (£ per sq. m)	Benchmark Turnover (£m)	Survey Derived Turnover 2020 (£m)	Market Share	Adjusted Market Share Following Store Closures (£m)	Adjusted Survey Derived Turnover 2020 Following Store Closures (£m)	Survey Derived Turnover 2033 (£m)	Survey Derived Turnover 2036 (£m)	Survey Derived Turnover 2041 (£m)
Zone 1a														
Crawley Town Centre														
Iceland, The Pavilion Centre, Queens Square, Crawley	608	313	51.48%	298	95.21%	6,663	£2.00	£3.80	1.16%	1.50%	£4.93	£5.27	£5.39	£5.60
Other Zone 1A							£0.20	£0.20	0.06%	0.14%	£0.46	£0.49	£0.50	£0.52
Zone 1b														
Neighbourhood Centres														
Co-op, Bewbush	967	582	60.19%	524	90.03%	10,514	£5.50	£2.10	0.64%	0.70%	£2.30	£2.46	£2.51	£2.61
Iceland, Broadfield Barton, Crawley	893	446	49.94%	426	95.52%	6,663	£2.80	£3.20	0.97%	0.97%	£3.20	£3.42	£3.50	£3.63
Tesco Express, Ifield	364	254	69.78%	229	90.16%	13,401	£3.10	£2.60	0.79%	0.79%	£2.60	£2.78	£2.84	£2.95
Co-op, Langley Parade	446	279	62.56%	252	90.32%	10,514	£2.60	£8.60	2.62%	2.62%	£8.60	£9.19	£9.40	£9.76
Co-op, Maidenbower Drive	265	159	60.00%	143	89.94%	10,514	£1.50	£5.30	1.61%	1.61%	£5.30	£5.66	£5.79	£6.01
Co-op, Tilgate Parade, Crawley	379	243	64.12%	219	90.12%	10,514	£2.30	£6.00	1.83%	1.83%	£6.00	£6.41	£6.56	£6.81
Co-op, Pound Hill Parade	216	102	47.22%	92	90.20%	10,514	£1.00	£0.80	0.24%	0.24%	£0.80	£0.85	£0.87	£0.91
Tesco Express, Peterhouse Parade	420	293	69.76%	264	90.10%	13,401	£3.50	£6.20	1.89%	1.89%	£6.20	£6.63	£6.78	£7.04
Edge of Centre														
Asda, Pegler Way, Crawley	8,345	5,193	62.23%	3,213	61.87%	13,268	£42.60	£39.00	11.86%	17.50%	£57.52	£61.47	£62.87	£65.28
Out of Centre														
Aldi, Acorn Retail Park, Betts Way	1,517	1,136	74.88%	991	87.24%	10,517	£10.40	£27.80	8.46%	8.80%	£28.93	£30.91	£31.62	£32.83
Iceland, Haslett Avenue	449	224	49.89%	214	95.54%	6,663	£1.40	£2.50	0.76%	0.76%	£2.50	£2.67	£2.73	£2.84
Lidl, Hazelwick Avenue, Crawley	948	678	71.52%	543	80.09%	9,814	£5.30	£17.30	5.26%	5.92%	£19.46	£20.79	£21.27	£22.08
Marks & Spencer Foodhall, Betts Way	1,456	873	59.96%	799	91.52%	10,176	£8.10	£4.40	1.34%	2.00%	£6.57	£7.03	£7.19	£7.46
Sainsbury's Superstore, Crawley Avenue	9,956	6,137	61.64%	4,204	68.50%	11,356	£47.70	£50.90	15.49%	18.74%	£61.60	£65.83	£67.33	£69.91
Tesco Express, Betts Way	389	272	69.92%	244	89.71%	13,401	£3.30	£7.20	2.19%	2.19%	£7.20	£7.69	£7.87	£8.17
Tesco Express, Downland Drive	273	191	69.96%	172	90.05%	13,401	£2.30	£4.10	1.25%	1.25%	£4.10	£4.38	£4.48	£4.65
Tesco Express, Tomlin Court	406	253	62.32%	227	89.72%	13,401	£3.00	£0.90	0.27%	0.27%	£0.90	£0.96	£0.98	£1.02
Tesco Extra, Hazelwick Avenue, Crawley	10,631	8,908	83.79%	5,755	64.60%	13,401	£77.10	£85.50	26.01%	29.00%	£95.32	£101.86	£104.19	£108.18
Other, Zone 1b	-	-		-		-	£4.20	£4.20	1.28%	1.28%	£4.20	£4.49	£4.59	£4.77
TOTAL							**£291.10**	**£328.70**	**100.00%**	**100.00%**	**£328.69**	**£351.25**	**£359.26**	**£373.02**

NOTES:

1. Benchmark Turnover and Survey Derived Market shares taken from Table 5 of Appendix D of the Crawley Retail Study 2020 (Scenario 2 population growth)
2. Turnover of stores grown in accordance with anticipated growth in population and expenditure for Crawley as set out in Table 2a of Appendix D of the Crawley Retail Study 2020 (Scenario 2 population growth) and is adjusted based on the Experian Retail Planner Briefing Note 22 (March 2025)
3. Market shares for Marks & Spencer, Morrisons and Sainsbury's have been redistributed following store closures.
4. Assumes same Population and Expenditure growth per annum between 2035 and 2041 as between 2030-2035

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 7: Convenience goods Diversion - 2033 (All floorspace) - Scenario 1

Destination	Survey Derived Turnover 2033 (£m)	Diversion 2033		Post- Diversion Turnover 2033 (£m)	Impact 2033
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Iceland, The Pavilion Centre, Queens Square, Crawley	£5.27	1.75%	£0.26	£5.01	4.88%
Other Zone 1A	£0.49		£0.00	£0.49	0.00%
Zone 1b					
Neighbourhood Centres					
Co-op, Bewbush	£2.46	0.75%	£0.11	£2.35	4.48%
Iceland, Broadfield Barton, Crawley	£3.42	0.75%	£0.11	£3.31	3.22%
Tesco Express, Ifield	£2.78	0.75%	£0.11	£2.67	3.97%
Co-op, Langley Parade	£9.19	0.75%	£0.11	£9.08	1.20%
Co-op, Maidenbower Drive	£5.66		£0.00	£5.66	0.00%
Co-op, Tilgate Parade, Crawley	£6.41		£0.00	£6.41	0.00%
Co-op, Pound Hill Parade	£0.85		£0.00	£0.85	0.00%
Tesco Express, Peterhouse Parade	£6.63		£0.00	£6.63	0.00%
Edge of Centre					
Asda, Pegler Way, Crawley	£61.47	21.00%	£3.09	£58.38	5.02%
Out of Centre					
Aldi, Acorn Retail Park, Betts Way	£30.91	15.00%	£2.20	£28.71	7.13%
Iceland, Haslett Avenue	£2.67	0.75%	£0.11	£2.56	4.13%
Lidl, Hazelwick Avenue, Crawley	£20.79	5.00%	£0.73	£20.06	3.53%
Marks & Spencer Foodhall, Betts Way	£7.03	1.00%	£0.15	£6.88	2.09%
Sainsbury's Superstore, Crawley Avenue	£65.83	24.50%	£3.60	£62.22	5.47%
Tesco Express, Betts Way	£7.69	1.00%	£0.15	£7.55	1.91%
Tesco Express, Downland Drive	£4.38	1.00%	£0.15	£4.23	3.35%
Tesco Express, Tomlin Court	£0.96	0.00%	£0.00	£0.96	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	£101.86	20.00%	£2.94	£98.92	2.89%
Other, Zone 1b	£4.49	1.00%	£0.15	£4.34	3.27%
Outside Crawley Zones 1a and 1b		5.00%	£0.73		
TOTAL	**£351.25**	**100.00%**	**£14.70**	**£337.29**	

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 8: Convenience goods Diversion - 2033 (All floorspace) - Scenario 2

Destination	Survey Derived Turnover 2033 (£m)	Diversion 2033		Post- Diversion Turnover 2033 (£m)	Impact 2033
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Iceland, The Pavilion Centre, Queens Square, Crawley	£5.27	1.75%	£0.26	£5.01	4.88%
Other Zone 1A	£0.49		£0.00	£0.49	0.00%
Zone 1b					
Neighbourhood Centres					
Co-op, Bewbush	£2.46	0.75%	£0.11	£2.35	4.48%
Iceland, Broadfield Barton, Crawley	£3.42	0.75%	£0.11	£3.31	3.22%
Tesco Express, Ifield	£2.78	0.75%	£0.11	£2.67	3.97%
Co-op, Langley Parade	£9.19	0.75%	£0.11	£9.08	1.20%
Co-op, Maidenbower Drive	£5.66		£0.00	£5.66	0.00%
Co-op, Tilgate Parade, Crawley	£6.41		£0.00	£6.41	0.00%
Co-op, Pound Hill Parade	£0.85		£0.00	£0.85	0.00%
Tesco Express, Peterhouse Parade	£6.63		£0.00	£6.63	0.00%
Edge of Centre					
Asda, Pegler Way, Crawley	£61.47	19.50%	£2.87	£58.60	4.66%
Out of Centre					
Aldi, Acorn Retail Park, Betts Way	£30.91	14.00%	£2.06	£28.85	6.66%
Iceland, Haslett Avenue	£2.67	0.75%	£0.11	£2.56	4.13%
Lidl, Hazelwick Avenue, Crawley	£20.79	5.00%	£0.73	£20.06	3.53%
Marks & Spencer Foodhall, Betts Way	£7.03	1.00%	£0.15	£6.88	2.09%
Sainsbury's Superstore, Crawley Avenue	£65.83	23.00%	£3.38	£62.45	5.14%
Tesco Express, Betts Way	£7.69	1.00%	£0.15	£7.55	1.91%
Tesco Express, Downland Drive	£4.38	1.00%	£0.15	£4.23	3.35%
Tesco Express, Tomlin Court	£0.96	0.00%	£0.00	£0.96	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	£101.86	19.00%	£2.79	£99.07	2.74%
Other, Zone 1b	£4.49	1.00%	£0.15	£4.34	3.27%
Outside Crawley Zones 1a and 1b		10.00%	£1.47		
TOTAL	**£351.25**	**100.00%**	**£14.70**	**£338.02**	

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 9: Convenience goods Diversion - 2036 (All floorspace) - Scenario 1

Destination	Survey Derived Turnover 2036 (£m)	Diversion 2036		Post- Diversion Turnover 2036 (£m)	Impact 2036
Zone 1a		**% Diversion**	**£ Diversion**		**% Diversion**
Iceland, The Pavilion Centre, Queens Square, Crawley	£5.39	1.75%	£0.26	£5.13	4.79%
Other Zone 1A	£0.50		£0.00	£0.50	0.00%
Zone 1b					
Neighbourhood Centres					
Co-op, Bewbush	£2.51	0.75%	£0.11	£2.40	4.40%
Iceland, Broadfield Barton, Crawley	£3.50	0.75%	£0.11	£3.39	3.16%
Tesco Express, Ifield	£2.84	0.75%	£0.11	£2.73	3.89%
Co-op, Langley Parade	£9.40	0.75%	£0.11	£9.29	1.18%
Co-op, Maidenbower Drive	£5.79		£0.00	£5.79	0.00%
Co-op, Tilgate Parade, Crawley	£6.56		£0.00	£6.56	0.00%
Co-op, Pound Hill Parade	£0.87		£0.00	£0.87	0.00%
Tesco Express, Peterhouse Parade	£6.78		£0.00	£6.78	0.00%
Edge of Centre					
Asda, Pegler Way, Crawley	£62.87	21.00%	£3.10	£59.78	4.92%
Out of Centre					
Aldi, Acorn Retail Park, Betts Way	£31.62	15.00%	£2.21	£29.40	6.99%
Iceland, Haslett Avenue	£2.73	0.75%	£0.11	£2.62	4.05%
Lidl, Hazelwick Avenue, Crawley	£21.27	5.00%	£0.74	£20.53	3.47%
Marks & Spencer Foodhall, Betts Way	£7.19	1.00%	£0.15	£7.04	2.05%
Sainsbury's Superstore, Crawley Avenue	£67.33	24.50%	£3.61	£63.72	5.36%
Tesco Express, Betts Way	£7.87	1.00%	£0.15	£7.72	1.87%
Tesco Express, Downland Drive	£4.48	1.00%	£0.15	£4.33	3.29%
Tesco Express, Tomlin Court	£0.98	0.00%	£0.00	£0.98	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	£104.19	20.00%	£2.95	£101.24	2.83%
Other, Zone 1b	£4.59	1.00%	£0.15	£4.44	3.21%
Outside Crawley Zones 1a and 1b		5.00%	£0.74		
TOTAL	**£359.26**	**100.00%**	**£14.74**	**£345.26**	

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 10: Convenience goods Diversion - 2036 (All floorspace) - Scenario 2

Destination	Survey Derived Turnover 2036 (£m)	Diversion 2036		Post- Diversion Turnover 2036 (£m)	Impact 2036
Zone 1a		**% Diversion**	**£ Diversion**		**% Diversion**
Iceland, The Pavilion Centre, Queens Square, Crawley	£5.39	1.50%	£0.22	£5.17	4.10%
Other Zone 1A	£0.50		£0.00	£0.50	0.00%
Zone 1b					
Neighbourhood Centres					
Co-op, Bewbush	£2.51	0.50%	£0.07	£2.44	2.93%
Iceland, Broadfield Barton, Crawley	£3.50	0.50%	£0.07	£3.42	2.11%
Tesco Express, Ifield	£2.84	0.50%	£0.07	£2.77	2.59%
Co-op, Langley Parade	£9.40	0.50%	£0.07	£9.33	0.78%
Co-op, Maidenbower Drive	£5.79		£0.00	£5.79	0.00%
Co-op, Tilgate Parade, Crawley	£6.56		£0.00	£6.56	0.00%
Co-op, Pound Hill Parade	£0.87		£0.00	£0.87	0.00%
Tesco Express, Peterhouse Parade	£6.78		£0.00	£6.78	0.00%
Edge of Centre					
Asda, Pegler Way, Crawley	£62.87	15.00%	£2.21	£60.66	3.52%
Out of Centre					
Aldi, Acorn Retail Park, Betts Way	£31.62	11.00%	£1.62	£29.99	5.13%
Iceland, Haslett Avenue	£2.73	0.50%	£0.07	£2.66	2.70%
Lidl, Hazelwick Avenue, Crawley	£21.27	4.00%	£0.59	£20.68	2.77%
Marks & Spencer Foodhall, Betts Way	£7.19	0.75%	£0.11	£7.07	1.54%
Sainsbury's Superstore, Crawley Avenue	£67.33	20.00%	£2.95	£64.38	4.38%
Tesco Express, Betts Way	£7.87	0.75%	£0.11	£7.76	1.40%
Tesco Express, Downland Drive	£4.48	0.75%	£0.11	£4.37	2.47%
Tesco Express, Tomlin Court	£0.98		£0.00	£0.98	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	£104.19	17.00%	£2.51	£101.68	2.41%
Other, Zone 1b	£4.59	1.75%	£0.26	£4.33	5.62%
Outside Crawley Zones 1a and 1b		25.00%	£3.69		
TOTAL	**£359.26**	**100.00%**	**£14.74**	**£348.20**	

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 11: Convenience goods Diversion - 2041 (All floorspace) - Scenario 1

Destination	Survey Derived Turnover 2041 (£m)	Diversion 2041		Post- Diversion Turnover 2041 (£m)	Impact 2041
Zone 1a		**% Diversion**	**£ Diversion**		**% Diversion**
Iceland, The Pavilion Centre, Queens Square, Crawley	£5.60	1.75%	£0.26	£5.34	4.63%
Other Zone 1A	£0.52		£0.00	£0.52	0.00%
Zone 1b					
Neighbourhood Centres					
Co-op, Bewbush	£2.61	0.75%	£0.11	£2.50	4.26%
Iceland, Broadfield Barton, Crawley	£3.63	0.75%	£0.11	£3.52	3.06%
Tesco Express, Ifield	£2.95	0.75%	£0.11	£2.84	3.77%
Co-op, Langley Parade	£9.76	0.75%	£0.11	£9.65	1.14%
Co-op, Maidenbower Drive	£6.01		£0.00	£6.01	0.00%
Co-op, Tilgate Parade, Crawley	£6.81		£0.00	£6.81	0.00%
Co-op, Pound Hill Parade	£0.91		£0.00	£0.91	0.00%
Tesco Express, Peterhouse Parade	£7.04		£0.00	£7.04	0.00%
Edge of Centre					
Asda, Pegler Way, Crawley	£65.28	21.00%	£3.11	£62.17	4.77%
Out of Centre					
Aldi, Acorn Retail Park, Betts Way	£32.83	15.00%	£2.22	£30.60	6.77%
Iceland, Haslett Avenue	£2.84	0.75%	£0.11	£2.73	3.92%
Lidl, Hazelwick Avenue, Crawley	£22.08	5.00%	£0.74	£21.34	3.35%
Marks & Spencer Foodhall, Betts Way	£7.46	1.00%	£0.15	£7.31	1.99%
Sainsbury's Superstore, Crawley Avenue	£69.91	24.50%	£3.63	£66.28	5.19%
Tesco Express, Betts Way	£8.17	1.00%	£0.15	£8.02	1.81%
Tesco Express, Downland Drive	£4.65	1.00%	£0.15	£4.50	3.18%
Tesco Express, Tomlin Court	£1.02	0.00%	£0.00	£1.02	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	£108.18	20.00%	£2.96	£105.21	2.74%
Other, Zone 1b	£4.77	1.00%	£0.15	£4.62	3.11%
Outside Crawley Zones 1a and 1b		5.00%	£0.74		
TOTAL	**£373.02**	**100.00%**	**£14.81**	**£358.95**	

Appendix 1 - Retal Assessment

Table 12: Convenience goods Diversion - 2041 (All floorspace) - Scenario 2

Destination	Survey Derived Turnover 2041 (£m)	Diversion 2041		Post- Diversion Turnover 2041 (£m)	Impact 2041
Zone 1a		**% Diversion**	**£ Diversion**		**% Diversion**
Iceland, The Pavilion Centre, Queens Square, Crawley	£5.60	0.75%	£0.11	£5.48	1.99%
Other Zone 1A	£0.52		£0.00	£0.52	0.00%
Zone 1b					
Neighbourhood Centres					
Co-op, Bewbush	£2.61	0.30%	£0.04	£2.57	1.70%
Iceland, Broadfield Barton, Crawley	£3.63	0.30%	£0.04	£3.59	1.22%
Tesco Express, Ifield	£2.95	0.30%	£0.04	£2.91	1.51%
Co-op, Langley Parade	£9.76	0.30%	£0.04	£9.72	0.46%
Co-op, Maidenbower Drive	£6.01		£0.00	£6.01	0.00%
Co-op, Tilgate Parade, Crawley	£6.81		£0.00	£6.81	0.00%
Co-op, Pound Hill Parade	£0.91		£0.00	£0.91	0.00%
Tesco Express, Peterhouse Parade	£7.04		£0.00	£7.04	0.00%
Edge of Centre					
Asda, Pegler Way, Crawley	£65.28	10.00%	£1.48	£63.80	2.27%
Out of Centre					
Aldi, Acorn Retail Park, Betts Way	£32.83	7.00%	£1.04	£31.79	3.16%
Iceland, Haslett Avenue	£2.84	0.30%	£0.04	£2.79	1.57%
Lidl, Hazelwick Avenue, Crawley	£22.08	2.50%	£0.37	£21.71	1.68%
Marks & Spencer Foodhall, Betts Way	£7.46	0.50%	£0.07	£7.39	0.99%
Sainsbury's Superstore, Crawley Avenue	£69.91	12.00%	£1.78	£68.13	2.54%
Tesco Express, Betts Way	£8.17	0.50%	£0.07	£8.10	0.91%
Tesco Express, Downland Drive	£4.65	0.50%	£0.07	£4.58	1.59%
Tesco Express, Tomlin Court	£1.02		£0.00	£1.02	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	£108.18	13.75%	£2.04	£106.14	1.88%
Other, Zone 1b	£4.77	1.00%	£0.15	£4.62	3.11%
Outside Crawley Zones 1a and 1b		50.00%	£7.41		
TOTAL	**£373.02**	**100.00%**	**£14.81**	**£365.61**	

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 13: Turnover of Comparison Stores - 2033, 2036 and 2041

Destination	Survery Derived Turnover 2020 (£m)	Market Share	Adjusted Market Share Following Store Closures (£m)	Adjusted Survey Derived Turnover 2020 Following Store Closures (£m)	Survery Dervived Turnover 2033 (£m)	Survery Dervived Turnover 2036 (£m)	Survery Dervived Turnover 2041 (£m)
Zone 1a							
Crawley Town Centre	405.40	49.25%	49.40%	406.63	£543.99	£600.81	£709.01
Zone 1b							
Broadfield Local Centre	0.60	0.07%	0.07%	0.60	£0.80	£0.89	£1.05
Maidenbower Local Centre	0.40	0.05%	0.05%	0.40	£0.54	£0.59	£0.70
Three Bridges Local Centre	0.80	0.10%	0.10%	0.80	£1.07	£1.18	£1.39
Tilgate Local Centre	0.20	0.02%	0.02%	0.20	£0.27	£0.30	£0.35
Asda, Pegler Way, Crawley	15.70	1.91%	1.91%	15.70	£21.00	£23.20	£27.37
B&Q, London Road, Crawley	26.60	3.23%	3.23%	26.60	£35.58	£39.30	£46.38
Carpetright, London Road, Crawley	7.40	0.90%	0.90%	7.40	£9.90	£10.93	£12.90
Denvale Trade Park	7.40	0.90%	0.90%	7.40	£9.90	£10.93	£12.90
Homebase, Crawley Avenue, Crawley	10.20	1.24%	1.24%	10.20	£13.65	£15.07	£17.78
Pets Corner, Spindle Way, Crawley	0.00	0.00%	0.00%	0.00	£0.00	£0.00	£0.00
Acorn Retail Park	48.80	5.93%	5.93%	48.80	£65.28	£72.10	£85.09
Copthorne Village Centre	0.20	0.02%	0.02%	0.20	£0.27	£0.30	£0.35
County Oak Retail Park	247.80	30.11%	30.11%	247.80	£331.50	£366.13	£432.06
Crawley Garden Centre, Copthorne	1.20	0.15%	0.15%	1.20	£1.61	£1.77	£2.09
Haskins Garden Centre, West Park Road	1.10	0.13%	0.13%	1.10	£1.47	£1.63	£1.92
Lidl, Hazelwick Avenue, Crawley	2.90	0.35%	0.35%	2.90	£3.88	£4.28	£5.06
Oakwood Industrial Park, Gatwick Road	2.90	0.35%	0.35%	2.90	£3.88	£4.28	£5.06
Sainsbury's Superstore, Crawley Avenue	16.30	1.98%	2.19%	18.03	£24.11	£26.63	£31.43
Squire's Garden Centre, Horsham Road	1.00	0.12%	0.12%	1.00	£1.34	£1.48	£1.74
Tesco Extra, Hazelwick Avenue, Crawley	14.70	1.79%	1.79%	14.70	£19.67	£21.72	£25.63
Wickes, Betts Way, Crawley	1.40	0.17%	0.17%	1.40	£1.87	£2.07	£2.44
Other, Zone 1B	7.10	0.86%	0.86%	7.10	£9.50	£10.49	£12.38
Total Crawley	**823.10**	**100.00%**	**100.00%**	**823.06**	**1101.07**	**1216.09**	**1435.08**

NOTES -

1. Total Turnover includes inflow from beyond Study Area
2. Turnover of stores grown in accordance with anticipated growth in population and expenditure for Crawley as set out in Table 2a of Appendix D of the Crawley Retail Study 2020 (Scenario 2 population growth) and is adjusted based on the Experian Retail Planner Briefing Note 22 (March 2025)
3. Market shares for Sainsbury's have been redistributed following store closure.
4. Assumes same Population and Expenditure growth per annum between 2035 and 2041 as between 2030-2035

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 14 - Comparison Goods Diversion - 2033 - Scenario 1

Destination	Survey Derived Turnover 2033 (£m)	Diversion 2033		Post- Diversion Turnover 2033 (£m)	Impact 2033
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Crawley Town Centre	543.99	20.00%	£2.56	£541.43	0.47%
Zone 1b					
Broadfield Local Centre	0.80	0.25%	£0.03	£0.77	3.98%
Maidenbower Local Centre	0.54	0.00%	£0.00	£0.54	0.00%
Three Bridges Local Centre	1.07	0.00%	£0.00	£1.07	0.00%
Tilgate Local Centre	0.27	0.00%	£0.00	£0.27	0.00%
Asda, Pegler Way, Crawley	21.00	13.00%	£1.66	£19.34	7.91%
B&Q, London Road, Crawley	35.58	0.00%	£0.00	£35.58	0.00%
Carpetright, London Road, Crawley	9.90	0.00%	£0.00	£9.90	0.00%
Denvale Trade Park	9.90	0.00%	£0.00	£9.90	0.00%
Homebase, Crawley Avenue, Crawley	13.65	0.00%	£0.00	£13.65	0.00%
Pets Corner, Spindle Way, Crawley	0.00	0.00%	£0.00	£0.00	0.00%
Acorn Retail Park	65.28	10.00%	£1.28	£64.00	1.96%
Copthorne Village Centre	0.27	0.00%	£0.00	£0.27	0.00%
County Oak Retail Park	331.50	13.50%	£1.73	£329.78	0.52%
Crawley Garden Centre, Copthorne	1.61	0.00%	£0.00	£1.61	0.00%
Haskins Garden Centre, West Park Road	1.47	0.00%	£0.00	£1.47	0.00%
Lidl, Hazelwick Avenue, Crawley	3.88	2.75%	£0.35	£3.53	9.06%
Oakwood Industrial Park, Gatwick Road	3.88	0.00%	£0.00	£3.88	0.00%
Sainsbury's Superstore, Crawley Avenue	24.11	21.00%	£2.69	£21.43	11.13%
Squire's Garden Centre, Horsham Road	1.34	0.00%	£0.00	£1.34	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	19.67	12.50%	£1.60	£18.07	8.13%
Wickes, Betts Way, Crawley	1.87	0.00%	£0.00	£1.87	0.00%
Other, Zone 1B	9.50	2.00%	£0.26	£9.24	2.69%
Outside Crawley Zones 1a and 1b		5.00%	£0.64		
Total	**1101.07**	**100.00%**	**£12.79**	**1088.93**	

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 15 - Comparison Goods Diversion - 2033 - Scenario 2

Destination	Survey Derived Turnover 2033 (£m)	Diversion 2033		Post- Diversion Turnover 2033 (£m)	Impact 2033
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Crawley Town Centre	543.99	20.50%	£2.62	£541.37	0.48%
Zone 1b					
Broadfield Local Centre	0.80	0.15%	£0.02	£0.78	2.39%
Maidenbower Local Centre	0.54	0.00%	£0.00	£0.54	0.00%
Three Bridges Local Centre	1.07	0.00%	£0.00	£1.07	0.00%
Tilgate Local Centre	0.27	0.00%	£0.00	£0.27	0.00%
Asda, Pegler Way, Crawley	21.00	11.00%	£1.41	£19.60	6.70%
B&Q, London Road, Crawley	35.58	0.00%	£0.00	£35.58	0.00%
Carpetright, London Road, Crawley	9.90	0.00%	£0.00	£9.90	0.00%
Denvale Trade Park	9.90	0.00%	£0.00	£9.90	0.00%
Homebase, Crawley Avenue, Crawley	13.65	0.00%	£0.00	£13.65	0.00%
Pets Corner, Spindle Way, Crawley	0.00	0.00%	£0.00	£0.00	0.00%
Acorn Retail Park	65.28	10.00%	£1.28	£64.00	1.96%
Copthorne Village Centre	0.27	0.00%	£0.00	£0.27	0.00%
County Oak Retail Park	331.50	13.50%	£1.73	£329.78	0.52%
Crawley Garden Centre, Copthorne	1.61	0.00%	£0.00	£1.61	0.00%
Haskins Garden Centre, West Park Road	1.47	0.00%	£0.00	£1.47	0.00%
Lidl, Hazelwick Avenue, Crawley	3.88	2.00%	£0.26	£3.62	6.59%
Oakwood Industrial Park, Gatwick Road	3.88	0.00%	£0.00	£3.88	0.00%
Sainsbury's Superstore, Crawley Avenue	24.11	19.00%	£2.43	£21.69	10.07%
Squire's Garden Centre, Horsham Road	1.34	0.00%	£0.00	£1.34	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	19.67	11.85%	£1.52	£18.15	7.70%
Wickes, Betts Way, Crawley	1.87	0.00%	£0.00	£1.87	0.00%
Other, Zone 1B	9.50	2.00%	£0.26	£9.24	2.69%
Outside Crawley Zones 1a and 1b		10.00%	£1.28		
Total	**1101.07**	**100.00%**	**£12.79**	**1089.57**	

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 16 - Comparison Goods Diversion - 2036 - Scenario 1

Destination	Survey Derived Turnover 2036 (£m)	Diversion 2036		Post- Diversion Turnover 2036 (£m)	Impact 2036
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Crawley Town Centre	600.81	20.00%	£2.72	£598.09	0.45%
Zone 1b					
Broadfield Local Centre	0.89	0.25%	£0.03	£0.85	3.83%
Maidenbower Local Centre	0.59	0.00%	£0.00	£0.59	0.00%
Three Bridges Local Centre	1.18	0.00%	£0.00	£1.18	0.00%
Tilgate Local Centre	0.30	0.00%	£0.00	£0.30	0.00%
Asda, Pegler Way, Crawley	23.20	13.00%	£1.77	£21.43	7.61%
B&Q, London Road, Crawley	39.30	0.00%	£0.00	£39.30	0.00%
Carpetright, London Road, Crawley	10.93	0.00%	£0.00	£10.93	0.00%
Denvale Trade Park	10.93	0.00%	£0.00	£10.93	0.00%
Homebase, Crawley Avenue, Crawley	15.07	0.00%	£0.00	£15.07	0.00%
Pets Corner, Spindle Way, Crawley	0.00	0.00%	£0.00	£0.00	0.00%
Acorn Retail Park	72.10	10.00%	£1.36	£70.74	1.88%
Copthorne Village Centre	0.30	0.00%	£0.00	£0.30	0.00%
County Oak Retail Park	366.13	13.50%	£1.83	£364.29	0.50%
Crawley Garden Centre, Copthorne	1.77	0.00%	£0.00	£1.77	0.00%
Haskins Garden Centre, West Park Road	1.63	0.00%	£0.00	£1.63	0.00%
Lidl, Hazelwick Avenue, Crawley	4.28	2.75%	£0.37	£3.91	8.72%
Oakwood Industrial Park, Gatwick Road	4.28	0.00%	£0.00	£4.28	0.00%
Sainsbury's Superstore, Crawley Avenue	26.63	21.00%	£2.85	£23.78	10.71%
Squire's Garden Centre, Horsham Road	1.48	0.00%	£0.00	£1.48	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	21.72	12.50%	£1.70	£20.02	7.82%
Wickes, Betts Way, Crawley	2.07	0.00%	£0.00	£2.07	0.00%
Other, Zone 1B	10.49	2.00%	£0.27	£10.22	2.59%
Outside Crawley Zones 1a and 1b		5.00%	£0.68		
Total	**1216.09**	**100.00%**	**£13.59**	**1203.18**	

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 17 - Comparison Goods Diversion - 2036 - Scenario 2

Destination	Survey Derived Turnover 2036 (£m)	Diversion 2036		Post- Diversion Turnover 2036 (£m)	Impact 2036
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Crawley Town Centre	600.81	13.50%	£1.83	£598.98	0.31%
Zone 1b					
Broadfield Local Centre	0.89	0.25%	£0.03	£0.85	3.83%
Maidenbower Local Centre	0.59	0.00%	£0.00	£0.59	0.00%
Three Bridges Local Centre	1.18	0.00%	£0.00	£1.18	0.00%
Tilgate Local Centre	0.30	0.00%	£0.00	£0.30	0.00%
Asda, Pegler Way, Crawley	23.20	8.00%	£1.09	£22.11	4.69%
B&Q, London Road, Crawley	39.30	0.00%	£0.00	£39.30	0.00%
Carpetright, London Road, Crawley	10.93	0.00%	£0.00	£10.93	0.00%
Denvale Trade Park	10.93	0.00%	£0.00	£10.93	0.00%
Homebase, Crawley Avenue, Crawley	15.07	0.00%	£0.00	£15.07	0.00%
Pets Corner, Spindle Way, Crawley	0.00	0.00%	£0.00	£0.00	0.00%
Acorn Retail Park	72.10	8.00%	£1.09	£71.02	1.51%
Copthorne Village Centre	0.30	0.00%	£0.00	£0.30	0.00%
County Oak Retail Park	366.13	11.00%	£1.49	£364.63	0.41%
Crawley Garden Centre, Copthorne	1.77	0.00%	£0.00	£1.77	0.00%
Haskins Garden Centre, West Park Road	1.63	0.00%	£0.00	£1.63	0.00%
Lidl, Hazelwick Avenue, Crawley	4.28	2.00%	£0.27	£4.01	6.34%
Oakwood Industrial Park, Gatwick Road	4.28	0.00%	£0.00	£4.28	0.00%
Sainsbury's Superstore, Crawley Avenue	26.63	18.00%	£2.45	£24.19	9.18%
Squire's Garden Centre, Horsham Road	1.48	0.00%	£0.00	£1.48	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	21.72	12.25%	£1.66	£20.06	7.66%
Wickes, Betts Way, Crawley	2.07	0.00%	£0.00	£2.07	0.00%
Other, Zone 1B	10.49	2.00%	£0.27	£10.22	2.59%
Outside Crawley Zones 1a and 1b		25.00%	£3.40		
Total	**1216.09**	**100.00%**	**£13.59**	**1205.90**	

Table 18 - Comparison Goods Diversion - 2041 - Scenario 1

Destination	Survey Derived Turnover 2041 (£m)	Diversion 2041		Post- Diversion Turnover 2041 (£m)	Impact 2041
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Crawley Town Centre	709.01	20.00%	£3.01	£706.00	0.42%
Zone 1b					
Broadfield Local Centre	1.05	0.25%	£0.04	£1.01	3.60%
Maidenbower Local Centre	0.70	0.00%	£0.00	£0.70	0.00%
Three Bridges Local Centre	1.39	0.00%	£0.00	£1.39	0.00%
Tilgate Local Centre	0.35	0.00%	£0.00	£0.35	0.00%
Asda, Pegler Way, Crawley	27.37	13.00%	£1.96	£25.42	7.15%
B&Q, London Road, Crawley	46.38	0.00%	£0.00	£46.38	0.00%
Carpetright, London Road, Crawley	12.90	0.00%	£0.00	£12.90	0.00%
Denvale Trade Park	12.90	0.00%	£0.00	£12.90	0.00%
Homebase, Crawley Avenue, Crawley	17.78	0.00%	£0.00	£17.78	0.00%
Pets Corner, Spindle Way, Crawley	0.00	0.00%	£0.00	£0.00	0.00%
Acorn Retail Park	85.09	10.00%	£1.51	£83.58	1.77%
Copthorne Village Centre	0.35	0.00%	£0.00	£0.35	0.00%
County Oak Retail Park	432.06	13.50%	£2.03	£430.03	0.47%
Crawley Garden Centre, Copthorne	2.09	0.00%	£0.00	£2.09	0.00%
Haskins Garden Centre, West Park Road	1.92	0.00%	£0.00	£1.92	0.00%
Lidl, Hazelwick Avenue, Crawley	5.06	2.75%	£0.41	£4.64	8.19%
Oakwood Industrial Park, Gatwick Road	5.06	0.00%	£0.00	£5.06	0.00%
Sainsbury's Superstore, Crawley Avenue	31.43	21.00%	£3.16	£28.27	10.06%
Squire's Garden Centre, Horsham Road	1.74	0.00%	£0.00	£1.74	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	25.63	12.50%	£1.88	£23.75	7.34%
Wickes, Betts Way, Crawley	2.44	0.00%	£0.00	£2.44	0.00%
Other, Zone 1B	12.38	2.00%	£0.30	£12.08	2.43%
Outside Crawley Zones 1a and 1b		5.00%	£0.75		
Total	**1435.08**	**100.00%**	**£15.05**	**1420.78**	

Homes England
Land West of Ifield

Appendix 1 - Retail Assessment

Table 19 - Comparison Goods Diversion - 2041 - Scenario 2

Destination	Survey Derived Turnover 2041 (£m)	Diversion 2041		Post- Diversion Turnover 2041 (£m)	Impact 2041
Zone 1a		**% Diversion**	**£ Diversion**		**%**
Crawley Town Centre	709.01	13.50%	£2.03	£706.97	0.29%
Zone 1b					
Broadfield Local Centre	1.05	0.25%	£0.04	£1.01	3.60%
Maidenbower Local Centre	0.70	0.00%	£0.00	£0.70	0.00%
Three Bridges Local Centre	1.39	0.00%	£0.00	£1.39	0.00%
Tilgate Local Centre	0.35	0.00%	£0.00	£0.35	0.00%
Asda, Pegler Way, Crawley	27.37	8.00%	£1.20	£26.17	4.40%
B&Q, London Road, Crawley	46.38	0.00%	£0.00	£46.38	0.00%
Carpetright, London Road, Crawley	12.90	0.00%	£0.00	£12.90	0.00%
Denvale Trade Park	12.90	0.00%	£0.00	£12.90	0.00%
Homebase, Crawley Avenue, Crawley	17.78	0.00%	£0.00	£17.78	0.00%
Pets Corner, Spindle Way, Crawley	0.00	0.00%	£0.00	£0.00	0.00%
Acorn Retail Park	85.09	8.00%	£1.20	£83.88	1.42%
Copthorne Village Centre	0.35	0.00%	£0.00	£0.35	0.00%
County Oak Retail Park	432.06	11.00%	£1.66	£430.41	0.38%
Crawley Garden Centre, Copthorne	2.09	0.00%	£0.00	£2.09	0.00%
Haskins Garden Centre, West Park Road	1.92	0.00%	£0.00	£1.92	0.00%
Lidl, Hazelwick Avenue, Crawley	5.06	2.00%	£0.30	£4.76	5.95%
Oakwood Industrial Park, Gatwick Road	5.06	0.00%	£0.00	£5.06	0.00%
Sainsbury's Superstore, Crawley Avenue	31.43	18.00%	£2.71	£28.72	8.62%
Squire's Garden Centre, Horsham Road	1.74	0.00%	£0.00	£1.74	0.00%
Tesco Extra, Hazelwick Avenue, Crawley	25.63	12.25%	£1.84	£23.79	7.20%
Wickes, Betts Way, Crawley	2.44	0.00%	£0.00	£2.44	0.00%
Other, Zone 1B	12.38	2.00%	£0.30	£12.08	2.43%
Outside Crawley Zones 1a and 1b		50.00%	£7.53		
Total	**1435.08**	**125.00%**	**£18.82**	**1423.79**	

Homes England
Land West of Ifield

Appendix 1 - Retal Assessment

Table 20a - Total Impact on Key Centres 2033 - Scenario 1

Destination	Pre-Development Turnover 2025	Pre-Development Turnover 2033	Diversion 2033 (£m)	Post- Diversion Turnover 2033 (£m)	Impact 2033	% of 2025 Turnover
Crawley Town Centre	425.69	549.75	2.81	£546.93	0.51%	128.48%
Bewbush Neighbourhood Centre	2.31	2.46	0.11	£2.35	4.50%	101.60%
Broadfield Barton, Crawley	3.83	4.22	0.14	£4.08	3.37%	106.40%
Ifield, Crawley	2.61	2.78	0.11	£2.67	3.97%	102.16%
Langley Parade, Langley Green, Crawley	8.64	9.12	0.11	£9.01	1.21%	104.31%
Tilgate Parade, Crawley	6.23	6.68	0.00	£6.68	0.00%	107.15%
Downland Drive, Crawley	4.12	4.38	0.15	£4.23	3.35%	102.81%

Notes:
1. Convenience floorspace figure only for Bewbush, Ifield, Langley Parade and Downland Drive

Table 20b - Total Impact on Key Centres 2036 - Scenario 1

Destination	Pre-Development Turnover 2025	Pre-Development TurnoverTurnover 2036	Diversion 2036 (£m)	Post- Diversion Turnover 2036 (£m)	Impact 2036	% of 2025 Turnover
Crawley Town Centre	425.69	606.70	2.98	£603.73	0.49%	141.82%
Bewbush Neighbourhood Centre	2.31	2.51	0.11	£2.40	4.40%	104.02%
Broadfield Barton, Crawley	3.83	4.38	0.14	£4.24	3.30%	110.56%
Ifield, Crawley	2.61	2.84	0.11	£2.73	3.89%	104.58%
Langley Parade, Langley Green, Crawley	8.64	9.40	0.11	£9.29	1.18%	107.53%
Tilgate Parade, Crawley	6.23	6.85	0.00	£6.85	0.00%	109.94%
Downland Drive, Crawley	4.12	4.48	0.15	£4.33	3.29%	105.23%

Notes:
1. Convenience floorspace figure only for Bewbush, Ifield, Langley Parade and Downland Drive

Table 20c - Total Impact on Key Centres 2041 - Scenario 1

Destination	Pre-Development Turnover 2025	Pre-Development TurnoverTurnover 2041	Diversion 2041 (£m)	Post- Diversion Turnover 2041 (£m)	Impact 2041	% of 2025 Turnover
Crawley Town Centre	425.69	715.12	3.27	£711.85	0.46%	167.22%
Bewbush Neighbourhood Centre	2.31	2.61	0.11	£2.50	4.26%	108.17%
Broadfield Barton, Crawley	3.83	4.68	0.15	£4.53	3.18%	118.11%
Ifield, Crawley	2.61	2.95	0.11	£2.84	3.77%	108.72%
Langley Parade, Langley Green, Crawley	8.64	9.76	0.11	£9.65	1.14%	111.69%
Tilgate Parade, Crawley	6.23	7.16	0.00	£7.16	0.00%	114.82%
Downland Drive, Crawley	4.12	4.65	0.15	£4.50	3.18%	109.38%

Notes:
1. Convenience floorspace figure only for Bewbush, Ifield, Langley Parade and Downland Drive

Appendix 1 - Retal Assessment

Table 21a - Total Impact on Key Centres 2033 - Scenario 2

Destination	Pre-Development Turnover 2025	Pre-Development Turnover 2033	Diversion 2033 (£m)	Post- Diversion Turnover 2033 (£m)	Impact 2033	% of 2025 Turnover
Crawley Town Centre	425.69	549.75	2.88	£546.87	0.52%	128.47%
Bewbush Neighbourhood Centre	2.31	2.46	0.11	£2.35	4.48%	101.61%
Broadfield Barton, Crawley	3.83	4.22	0.13	£4.09	3.06%	106.74%
Ifield, Crawley	2.61	2.78	0.11	£2.67	3.97%	102.16%
Langley Parade, Langley Green, Crawley	8.64	9.19	0.11	£9.08	1.20%	105.11%
Tilgate Parade, Crawley	6.23	6.68	0.00	£6.68	0.00%	107.15%
Downland Drive, Crawley	4.12	4.38	0.15	£4.23	3.35%	102.81%

Notes:
1. Convenience floorspace figure only for Bewbush, Ifield, Langley Parade and Downland Drive

Table 21b - Total Impact on Key Centres 2036 - Scenario 2

Destination	Pre-Development Turnover 2025	Pre-Development TurnoverTurnover 2036	Diversion 2036 (£m)	Post- Diversion Turnover 2036 (£m)	Impact 2036	% of 2025 Turnover
Crawley Town Centre	425.69	606.70	2.06	£604.65	0.34%	142.04%
Bewbush Neighbourhood Centre	2.31	2.51	0.07	£2.44	2.93%	105.62%
Broadfield Barton, Crawley	3.83	4.38	0.11	£4.28	2.46%	111.52%
Ifield, Crawley	2.61	2.84	0.07	£2.77	2.59%	105.99%
Langley Parade, Langley Green, Crawley	8.64	9.40	0.07	£9.33	0.78%	107.95%
Tilgate Parade, Crawley	6.23	6.85	0.00	£6.85	0.00%	109.94%
Downland Drive, Crawley	4.12	4.48	0.11	£4.37	2.47%	106.12%

Notes:
1. Convenience floorspace figure only for Bewbush, Ifield, Langley Parade and Downland Drive

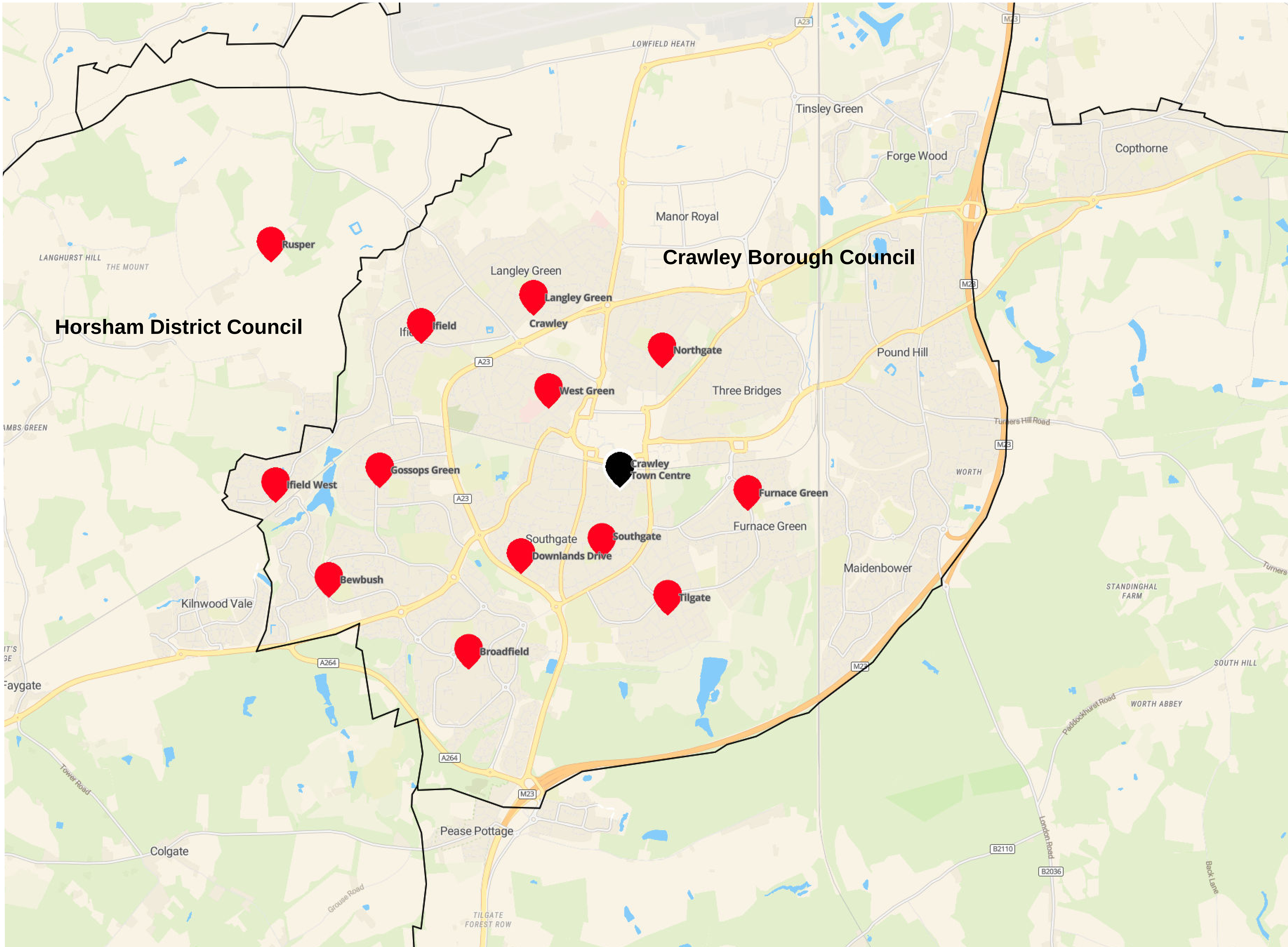
Table 21c - Total Impact on Key Centres 2041 - Scenario 2

Destination	Pre-Development Turnover 2025	Pre-Development TurnoverTurnover 2041	Diversion 2041 (£m)	Post- Diversion Turnover 2041 (£m)	Impact 2041	% of 2025 Turnover
Crawley Town Centre	425.69	715.12	2.14	£712.98	0.30%	167.49%
Bewbush Neighbourhood Centre	2.31	2.61	0.04	£2.57	1.70%	111.05%
Broadfield Barton, Crawley	3.83	4.68	0.08	£4.60	1.75%	119.85%
Ifield, Crawley	2.61	2.95	0.04	£2.91	1.51%	111.27%
Langley Parade, Langley Green, Crawley	8.64	9.76	0.04	£9.72	0.46%	112.46%
Tilgate Parade, Crawley	6.23	7.16	0.00	£7.16	0.00%	114.82%
Downland Drive, Crawley	4.12	4.65	0.07	£4.58	1.59%	111.18%

Notes:
1. Convenience floorspace figure only for Bewbush, Ifield, Langley Parade and Downland Drive

APPENDIX 02
EXISTING RETAIL PROVISION IN CRAWLEY

APPENDIX 2 - EXISTING RETAIL PROVISION IN CRAWLEY



APRIL 2025

APPENDIX 03

EXISTING HEALTH CHECK AND GOAD PLAN OF CRAWLEY TOWN CENTRE

HEALTH CHECK ASSESSMENT

CENTRE:	**CRAWLEY TOWN CENTRE**
DATE UNDERTAKEN:	**26 FEBRUARY 2025**

Image 1.0: Map of Crawley Town Centre (Source: Google Maps)

1.	**Diversity Of Uses & Retailer Representation**
	Crawley Town Centre is the main retail centre and leisure destination within Crawley Borough. It is also a key shopping destination for people living in the wider sub-region.

	It accommodates a wide range of shops, entertainment, recreational uses, cafés, restaurants and bars. The Town Centre is broadly defined by Crawley Leisure Park and Town Hall in the north, Pegler Way in the west, Crawley Train Station in the south, and Crawley College in the east. The Town Centre's convenience provision comprises an Iceland supermarket located on Queens Square, with an Asda Superstore located on Peglar Way on the edge of the Town Centre boundary. A number of smaller independent convenience stores are also located within the Town Centre. The Town Centre has a strong comparison goods offer and has the highest market share across most categories of comparison goods within the Borough. A notable amount of the comparison goods offer is contained within the County Mall Shopping Centre, which accommodates over 90 shops, with occupiers including Primark, Next, B&M and Boots. It also has an 1,800-space car park, which provides one of the main town centre car parks. Other national retailers in the Town Centre include Decathlon, Poundland, TK Maxx and New Look.
2.	**Vacant Units**
	At the time of the survey, Cawley Town Centre had a total of 380 units, with a vacancy rate of 8.89%. This represents a decrease since the date of the 2020 Retail Study, when the vacancy rate was 10.80%. The vacancy rate in the Town Centre is significantly below the UK average for 2024 of 19.6%. The vacancy rate reduction since the 2020 Retail Study demonstrates that the Centre has improved over this period, despite the effects of Covid, and the closure of national retailers including Debenhams, which had previously comprised an anchor tenant within in the Town Centre. It should be recognised that some level of vacancy within centres is beneficial, as it allows for 'churn' as the market changes and evolves.
3.	**Commercial Yields**
	This information was not available from the latest PMA PROMIS Report from March 2025.
4.	**Customers' Experience and Behaviour**
	The Household Telephone Survey, conducted to inform the 2020 Retail Study, revealed that Crawley Town Centre's customers appreciate the variety and selection of shops, as well as its convenient proximity to home and work. When asked what would encourage them to visit the Town Centre more frequently, respondents highlighted the need for a broader range of shops, more affordable parking, and an improved overall environment.
5.	**Retailer Representation and Intentions To Change Representation**
	Crawley Town Centre has seen some notable change to its retailer representation in recent years, with the convenience provision reducing following the closure of Marks and Spencer in November 2024, Sainsbury's in 2021 and Morrisons in 2019. Crawley has also seen the loss of a number of a number of comparison retailers over recent years due companies entering administration, such as Debenhams and Topshop, as well as the closure of Marks and Spencer, although the comparison goods offering remains strong. Whilst a number of retailers have vacated the Town Centre in recent years, several new retailers have occupied units, such as Poundstretcher in January 2024.

6.	**Commercial Rents**
	According to the latest PMA PROMIS Report from March 2025, the estimated Prime Zone A retail rent for Crawley Town Centre stood at £65 per sq. ft.
7.	**Pedestrian Flows**
	At the time of the site visit, pedestrian flows were highest around the County Mall Shopping Centre, within Queens Square and on The Martletts. Memorial Gardens also experienced high levels of footfall. Footfall decreased notably towards the edges of the centre, including along High Street and Peglar Way.
8.	**Accessibility**
	Crawley Town Centre is widely accessible by a variety of modes of transport. The centre is well served by public transport with a high number of bus stops served by a range of services. There is a dedicated bus station, catering for the bus routes servicing the Town Centre. Crawley train station is located within the Town Centre boundary, offering frequent trains to London Victoria and London Bridge, via Three Bridges and Gatwick Airport, to Horsham via Ifield and Littlehaven, as well as the south coast. Crawley Town Centre has a good level of car parking provision, including around 4,000 spaces, within the Town Hall and Orchard St multi-storey car parks, and at County Mall Shopping Centre, Crawley Hospital, Crawley Library and Tilgate Park. Large parts of the Town Centre are pedestrianised which maximises permeability. These areas are also highly accessible for those with limited mobility. The Town Centre is also served by a series of cycle routes, and there is dedicated cycle parking provided throughout.
9.	**Perception of Safety**
	At the time of the site visit, the general perception of safety within the Town Centre was high. CCTV surveillance and regular police patrols were observed during the site visit, with limited vandalism and other indications of anti-social behaviour observed. The latest data from police.uk dated December 2024 confirms that 124 crimes were reported in the Town Centre that month, including 27 incidents of shop lifting and 15 incidents of 'other theft'. The most reported type of crime was violence and sexual offences, of which there were 36 incidents reported.
10.	**Environmental Quality**
	At the time of the site visit Crawley Town Centre was well-maintained, with clean streets, landscaping, and public seating enhancing its overall environment. Pedestrianised areas such as Queens Square provide attractive spaces for shoppers and visitors. Investment in urban greening, including trees and flowerbeds, contributes to air quality and visual appeal. Ongoing efforts to improve safety within public spaces, such as increased street lighting and policing, assist in making the Town Centre a welcoming destination. The Town Centre appeared clean during the site visit, with ongoing maintenance and signs of regeneration projects, which help to sustain a high standard of environmental quality. As shown on image 1.0 below, Queens Square has recently been refurbished with new seating and fountains.

	 *Image 2.0: Queens Square*
11	**Balance Between Independent and Multiple Stores**
	Crawley Town Centre has a reasonable mix of national multiples and independent businesses. National providers include Decathlon, Poundland, TK Maxx and New Look, although it has limited high-end provision and independent retailers. Independent retailers are generally located in the secondary streets and areas. Occupiers include Mabu Leather, The Boulevard Florist and James Stephen Jewellers. There are a number of food and beverage uses in the Town Centre, including national providers such as Costa Coffee, Subway, Prezzo, McDonald's and Pizza Express. There is also a number of independent food, beverage and public house providers, such as Crow Café, Tamashah Indian Restaurant, Tukuaz Restaurant, Octopus Bar and The Old Punchbowl.
12.	**Evidence of Barriers to New Businesses Opening & Existing Businesses Expanding**
	At the time of the site visit, a number of vacant units were identified which could accommodate new businesses. However, the majority of these are small scale, being below 100 sq. m in size. However, there are a number of medium sized vacant units, between 300-500 sq. m, which could accommodate new or expanded businesses. The largest vacant unit, the former Debenhams, would be too large for many businesses to occupy, and would therefore need to be subject to a comprehensive re-modelling, which would have associated costs and timing implications.
13.	**Opening Hours & Evening / Night Time Economy**
	The majority of the services within the Town Centre, including shopping, cafes and restaurants, are limited to daytime / early evening hours. County Mall Shopping Centre has late night shopping until 8pm on Thursdays, alongside a number of the other retailers in the Town Centre. However, Crawley Town Centre is considered to have a good evening and night-time economy, offering a range of dining, entertainment, and other leisure uses. It has a variety of restaurants, pubs, and late-night venues which cater to different demographics. The Town Centre's night-time economy is supported by good transport links, including late-night bus services.

GOAD MAP OF CRAWLEY TOWN CENTRE

50 metres

SITE VISIT UNDERTAKEN ON 26 FEBRUARY 2025

Experian Goad Plan Created: 01/04/2025
Created By: Montagu Evans

For more information on our products and services:
www.experian.co.uk/goad | goad.sales@uk.experian.com | 0845 601 6011

MONTAGU EVANS

70 ST MARY AXE
LONDON
EC3A 8BE