



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land West of Ifield, Charlwood Road, Ifield
<b>DESCRIPTION:</b>	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 for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.
<b>REFERENCE:</b>	DC/25/1312
<b>RECOMMENDATION:</b>	<u>Advice</u> / <u>No Objection</u> / <u>Objection</u> / <u>More Information</u> / <u>Modification</u> / <u>Refusal</u>

## **SUMMARY OF COMMENTS & RECOMMENDATION:**

The hybrid application is to be assessed against the adopted Horsham District Planning Framework 2015 (HDPF) which is to be considered in the context of the presumption in favour of sustainable development ('tilted balance') applying. An important material consideration is the Horsham District Local Plan 2023-40 which is the emerging Local Plan (eLP), albeit limited weight is applied to its policies given the current pause in the eLP's examination and uncertainty over its progress.

Notwithstanding the eLP's paused status, eLP Strategic Policy HA2: Land West of Ifield is (along with the rest of the eLP) the Council's endorsed framework for assessing the application. The eLP allocation of Land West of Ifield signifies support in principle for the application. All criteria in Policy HA2 are underpinned by the evidence prepared to support the eLP ahead of its submission which itself is a material consideration which has informed this response.

The application proposals broadly align with most of the criteria in Policy HA2. However, the Policy Team has identified shortcomings in the evidence provided in support of the application which require full address before the application can be considered fully compliant with the development plan. The eLP is also an important material consideration, and if the applicant is placing reliance on the draft allocation within the eLP, equivalent weight should be given to meeting the criteria within the draft allocation policy.

The Policy Team **recommendation** is that further submissions should be requested from the applicant to demonstrate full compliance with the adopted and emerging development plan. The response below sets out the Policy Team's main concerns based on the HDPF and, where relevant, the equivalent eLP policies. The recommended further submissions, and also suggested conditions or legal clauses, are listed in the **Annex**.

## **MAIN COMMENTS:**

### **1. Status of the Local Plan**

- 1.1** The Horsham District Local Plan (HDPF) was adopted by the Council in 2015 and is therefore now over 5 years old.
- 1.2** Horsham District Council has reviewed the HDPF and prepared the draft Horsham District Local Plan 2023-2040 which achieved formal Council endorsement and was submitted to the Secretary of State for formal examination in July 2024 (referred to hereafter as the 'emerging Local Plan' or 'eLP'). The eLP sets out planning policies and proposals intended to guide development in the district, excluding the South Downs National Park, up to 2040. Examination hearings commenced in December 2024, but the remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024. In April 2025 the Council received the Inspector's Interim Findings Letter which has recommended that the Plan be withdrawn, due to his view that the Council has failed to satisfactorily comply with the legal Duty to Co-operate.

**1.3** In his Interim Findings Letter (paragraph 95), the Inspector indicated that in relation to its evidence base “*the Council could utilise much of the good and comprehensive work already undertaken*” to commence work on a new Local Plan. There is therefore no reason to think that relevant sections of the local plan evidence could not equally be a material consideration in determining planning applications, including when considering whether HDPF policies are out-of-date, albeit the decision-maker will need to determine weight given to adopted and emerging policies and the Council’s evidence base.

**1.4** There is nothing in the Inspector’s letter to suggest that there were any concerns over the proposed employment or housing allocations in the eLP including strategic allocation policies. The Inspector’s stated concerns more broadly related to whether sufficient housing was being planned for overall and whether more sites could have been delivered over the Plan period.

**1.5** Notwithstanding the Inspector’s letter, the eLP remains the Council’s own agreed policy position, and has been subject to two periods of representation or comment. The Council wrote to the Inspector on 11 November 2025 to request re-opening of the examination hearings in light of recent circumstantial changes that have a direct impact on his findings with respect to the Duty to Cooperate. Furthermore, a key purpose of the eLP was to provide a strategy for the delivery of housing and employment development within Horsham District. It sought to contribute towards the Government’s aim of boosting housing growth. The housing policies and allocations in the eLP have sought to address this need. Therefore, in certain circumstances it may be reasonable to attach some limited weight to the site-specific policies or other policies seeking to maximise the delivery of housing / affordable housing and meet employment needs. The eLP remains a material consideration, albeit of limited weight, as a Council approved spatial strategy, unless it is withdrawn. No decision to do so has been taken.

## **2. Rusper Neighbourhood Plan**

**2.1** The Rusper Neighbourhood Plan 2018-31 (RNP) was made by the Council on 23 June 2021. The application site falls within the Neighbourhood Plan Area. Regard should therefore be had to the RNP Vision, Objectives and Land Use Policies insofar as matters on the character and design preferences affecting the wider Parish area are considered.

**2.2** The RNP does not allocate sites for development and therefore does not directly contribute to meeting local housing needs, hence NPPF paragraph 14 is disengaged and the RNP does not weigh against the ‘tilted balance’. It is considered that the RNP will have very limited weight in considering the principle of the West of Ifield development.

## **3. Principle of development**

**3.1** The key HDPF policies which relate to the principle and locations of development are Strategic Policies 2, 3 and 4. Strategic Policy 2: Strategic Development, which provides the framework for growth patterns across the District. Parts 5 and 6 of this policy are relevant, as they support in principle the sustainable development of settlements whilst retaining existing settlement patterns. The policy also supports

managing development around the edges of existing settlements to prevent settlement merging and protect rural character and landscape. Strategic Policy 3: Development Hierarchy recognises that main towns are able to meet the majority of its own needs and many of those in smaller settlements. Strategic Policy 4: Settlement Expansion supports development in principle provided five criteria are met.

**3.2** It is recognised that Horsham District Council does not have a five-year housing land supply as framed in NPPF paragraph 11. In addition, the Council is not currently meeting the housing delivery test as described in the NPPF. It is therefore accepted that the 'presumption in favour of sustainable development' (or 'tilted balance') is engaged, which sets the expectation that planning permission will be granted unless either NPPF para 11(d) criteria (i) or (ii) apply. Within this context, in September 2025, the Council endorsed the Shaping Development in Horsham District Planning Advice Note (SDPAN). The purpose of the document is to support sustainable development that both delivers the development to meet identified needs and ensures that other objectives are met. The document is intended to provide clarity as to the Council's approach and provide guidance to those who engage with the planning system in Horsham District. The case officer is advised to have regard to the SDPAN as a material consideration, in respect of weight applied to the policies in both the adopted and emerging plans. Attention is in particular drawn to the sections 'Sites identified within the emerging Horsham District Local Plan 2023-40', which advises positive weight is given to draft site allocations in the eLP and the evidence supporting them, and to 'Local Sustainability and Scale' which sets a framework for positive consideration of suitable sites.

**3.3** The Emerging Local Plan (eLP) allocated a number of employment and housing sites which reflected evidence in the Site Assessment Report, which forms part of the key evidence base in the selection and allocation of sites in the emerging Local Plan. The West of Ifield site assessment is found in Part B of that report (reference SA101). The concluding officer recommendation states:

*"Taking account of the location of the site close to both Crawley and Horsham, this site is well located in terms of its ability to significantly address Horsham District's housing need, and further address pressing educational needs for both Horsham District and Crawley. Urban extensions have also been identified in the Council's Sustainability Appraisal as performing reasonably well in their ability to deliver sustainable development."*

*Homes England is the national agency for strategic housing delivery and there is potential to help secure infrastructure investment required to accelerate housing delivery. The site is therefore considered suitable for allocation. However, any scheme must be carefully designed to deliver high quality development that minimises landscape, biodiversity and other environmental impacts and takes account of its relationship on the edge of Crawley. The development will also need to deliver very high rates of sustainable travel and contribute towards the delivery of a wider multimodal western link."*

**3.4** The eLP duly proposes allocation of the site as Strategic Policy HA2: Land West of Ifield. The draft allocation indicates the Council's support in principle for the development in this location. The policy is therefore considered to attract material

weight. Policy HA2 is referred to throughout the remainder of this consultation response.

**3.5** In addition to the allocation of HA2, the eLP includes Strategic Policy HA1: Strategic Site Development Principles, which aims to secure vibrant and successful new communities at the strategic sites. The eLP further includes Strategic Policy 2: Development Hierarchy, this sets out a Settlement Hierarchy which recognises that a 'main town' meets the majority of its own needs and many of those in smaller settlements. Strategic Policy 3: Settlement Expansion supports the expansion of existing settlements where six criteria are met. These eLP policies are also relevant.

**3.6** Given the proposed development will form an extension to the Crawley built-up area, and in light of the tilted balance being engaged, it is considered that it sufficiently meets the criteria of both HDPF Strategic Policy 2 and eLP Strategic Policy 3. It also meets the criteria of the SDPAN paragraph 5.7 (positive consideration of sites identified in the eLP) and paragraph 5.12 (criteria for positively considering unallocated sites). In policy terms it is therefore considered in principle to be an appropriate location for development.

#### **4. Economic development and retail**

##### *Economic development – employment*

**4.1** HDPF Strategic Policy 7: Economic Growth seeks sustainable employment development in the District. Of relevance to this proposal is the expectation of accommodating small, start-up and move-on businesses, and encouraging home working. It should be recognised that the evidence underpinning this policy is now somewhat dated, and more recent evidence is more material (see below).

**4.2** The eLP includes an equivalent policy, Strategic Policy 29: new Employment which seeks to allocate employment land to accommodate development falling within B2, B8 and E(g) Use Classes. This includes within the Strategic Allocation HA2, with the allocation policy – HA2.2(d) – requiring around 2.0 ha. of employment floorspace to incorporate an enterprise and innovation centre, and to include:

- i. non-retail and restaurant E class employment uses (offices, research, professional services and light industrial);
- ii. B2/B8 uses (general industry and warehouse/distribution; and
- iii. provision for improved home working facilities and desk space units within the development.

**4.3** In this context, having reviewed the information submitted with the application, the following advice and requests for further information and modification of submission materials is given:

- a. The proposals as set out in the Parameter Plans and detailed in the Draft Design Code for the Neighbourhood Centre are generally supported. The provision of an Innovation Centre is supported as being central to achieving the vision for the site – noting this will come forward in the early phases, there should be robust conditions applied to ensure timely submission and

implementation of the proposed Innovation Strategy, which will inform the exact nature of the Innovation Centre.

- b. There seems to be over-reliance on multi-storey, mixed-use blocks for employment and provision near residential. Given current evidence on the need for viability and flexibility of employment units alongside the clear market-driven need for more use class B provision locally, single storey industrial type, plus flexible buildings that can be subdivided into small units (or vice versa) should be the focus. In comparison, what appears to be proposed is significant provision of office-type space and higher-density multi-storey blocks, up to 20m in height, across much of parcels R1, R2 and R3. The viability and flexibility of the applicant's offer for businesses versus single storey industrial units is therefore questioned and raises a concern that the approach could result in employment failing to be delivered.
- c. Concern is also raised over the Land Use Parameter Plan proposal to identify parcels RV1 and RV2 as mixed employment/residential. This has potential to unduly constrain the development and operation of industrial and warehousing uses due to conflicts with residential amenity, and could dilute the potential for employers to locate in the area and remain viable. To address concerns, consideration should be given to the Parameter Plan being amended to remove residential uses from RV1 and RV2. Alternatively, the Economic Employment and Development Strategy (EEDS) and other relevant documents will need amending to clarify on intended uses and explain/illustrate how land use constraints and conflicts will be convincingly dealt with.
- d. The EEDS, particularly Option 1, is not currently aligned with local planning guidance or economic needs. It is of particular concern that Option 1 would not deliver any B2 or B8 development, however Option 2 is also potentially too reliant on office-type uses likely to be better suited to the Neighbourhood Centre.
- e. Notwithstanding the above, the Planning Statement (p26) states that 12,600 sqm of B2/B8 floorspace is expected to be delivered in Phase 3, together with 8,558 sqm of E uses. This significantly departs from EEDS Option 1, and is not quite consistent with EEDS Option 2 (which envisages 12,400 sqm of B2/B8 and 18,900 sqm of E uses including the Innovation Centre). The quanta of various uses need clarifying. It is noted that there is proposed to be a review of the EEDS every 2 years, to be secured in a S106 Agreement – this is supported but must be worded such that the core economic strategy (which should focus on start-ups, B2 and B8 for parcels RV1, RV2 and RV3) is not diluted.
- f. Throughout the EEDS, reference is made to provision for use classes E, B2 and B8 in parcels RV1, RV2 and RV3. Use class E includes a range of commercial uses including retail, which should not be permitted in parcels RV1, RV2 and RV3. Therefore, the EEDS should be amended to refer only to B2, B8 and E(g) uses with regards RV1, RV2 and RV3, to make clear that out-of-town retail is not inadvertently permitted to locate in these parcels.
- g. It is noted that the EEDS (para 7.5) sees a hotel or other class C institutions as potentially part of proposals for parcels RV1 and 2, although this does not appear in the dHoT therefore it is presumably not a use upon which the delivery of the strategy depends. It is further noted that there is also potential

for an 80 bedroom hotel as part of the Neighbourhood Centre, as such the need for two hotels in close proximity is queried. If reference relating to parcels RV1 and 2 is retained, it should be clarified that the hotel use will not be classed as 'employment' but as 'employment generating' for purposes of assessment against HDPF and eLP policies.

- h. Proposals for apprenticeships and local college engagement in construction phases via an Employment and Skills Plan are welcomed, however it is recommended that more details are provided as to how these will be realised.
- i. It is requested that the approach to monitoring and implementation makes clearer how the marketing, innovation and local employment strategies will be implemented and monitored, including how employment occupiers will be incentivised to locate here given it is not an existing area with proven market links.

**4.4 In summary**, whilst broadly supporting the proposals for the Neighbourhood Centre, the Policy Team queries whether the Land Use and Building Heights Parameter Plans for parcels RV1, RV2 and RV3 are appropriate. There is concern that neither mixed-use involving residential, nor high-density building formats, are conducive to successful delivery of the types of employment use that are needed and clarification on how these formats can respond to market demands is requested. Shortcomings to the EEDS have also been identified, again leading to a concern that the approach may lead to delivery issues. It is recommended that the parameter plans and the EEDS are amended to reflect these concerns.

#### *Retail*

**4.5** The HDPF includes Strategic Policy 12: Vitality and Viability of Existing Retail Centres. The policy seeks to implement a 'town centre first' strategy, whereby only exceptionally will town centre uses such as retail be permitted outside of town centre locations. The HDPF was adopted before it was known that the application site would be proposed as an allocation, hence there is no new retail centre allocated west of Crawley. However, the precedence of the North of Horsham allocation in the HDPF, which includes a local retail centre, demonstrates that local retail provision for large-scale developments will be expected.

**4.6** The eLP includes Strategic Policy 35: Town Centre Hierarchy. It requires that a full and detailed retail impact assessment is undertaken for out-of-centre retail proposals of 500 sqm of more. The policy should be given some, albeit limited, weight as it broadly reflects the approach set out in the NPPF.

**4.7** The NPPF similarly requires that a sequential test should be applied (essentially 'town centre first') (paragraphs 91-93) and that an impact assessment is undertaken for retail and leisure development outside town centres (paragraph 94).

**4.8** In the eLP, Strategic Policy HA2 2(c) includes within the draft allocation approximately 3,300 sqm of retail space to cater for day-to-day shopping and service needs delivered as part of the Neighbourhood Centre and/or secondary neighbourhood centre and a medium size food store.

**4.9** The proposal contained in this application is for a maximum 5,200 sqm of retail uses all of which will be located in the Neighbourhood Centre. This would break down to a 1,900 sqm convenience foodstore, and 3,300 sqm of comparison (local) shops. These would complement the leisure, health, office and childcare services also to be located in the Neighbourhood Centre. This is compliant with Policy HA2.

**4.10** To ensure compliance with the NPPF, the applicant has undertaken a retail impact assessment. This is underpinned by the assumption that the site functions as an urban extension to Crawley. It includes a sequential test, which focuses primarily on the Crawley urban area (i.e. Crawley town centre and existing nearby neighbourhood centres). Outside of Crawley Town, the only centre included was Rusper village. The views of Crawley Borough Council in terms of the retail impact on the town will therefore be important to factor in in this respect.

**4.11** The assessment concludes no significant impacts on existing retail centres, reflecting that the offer proposed supports sustainable residential growth within the application site and is tailored to local need, thus minimising wider impact. It is also noted that the Crawley Retail Study (2020) identified “significant need for additional convenience floorspace within the Borough” which the proposal may help to address.

**4.12** The Policy Team considers the assessment to be sufficiently robust. Rusper village has only a local convenience shop which serves the local village and has no wider strategic function or impact and is unlikely to be significantly affected. Horsham Town centre is considered, and the outcome of the assessment is not disputed with regards Horsham centre or other centres in the District. It will be for Crawley Borough Council to consider whether the assessment fairly considers impacts on retail centres within Crawley (HDC Policy Team is reasonably satisfied that these will not be significant). The case officer may wish to question why the assessment omitted to assess impacts on the M&S foodstore at Faygate Roundabout BP service station.

## **5. Housing and Gypsy and Traveller accommodation**

### *Housing mix (size and tenure including affordable housing)*

**5.1** HDPF Strategic Policy 16: Meeting Local Housing Needs is premised on achieving a mix of housing sizes, types and tenures to meet the needs of the district's communities. It requires residential developments 35% of dwellings to be affordable, with the supporting text clarifying that the tenure split target is 70% social/affordable rented and 30% intermediate/shared ownership.

**5.2** The eLP includes Strategic Policy 38: Meeting Local Housing Needs which specifies that a mix of housing sizes and types should be provided to meet needs as evidenced in the latest Strategic Housing Market Assessment (SHMA). It also supports development of self-build homes. Also in the eLP, Strategic Policy 39: Affordable Housing provides a specific affordable housing target for the West of Ifield strategic sites of 40% – the supporting text states the reason for the higher target as the particular housing needs evidenced in the Crawley Borough Local Plan 2024-2040 and a legacy of public land ownership.

**5.3** Having regard to the policy framework, the following clarifications are requested:

a. The Planning Statement (para 7.3.9) sets out a proposed blended housing mix to be applied across all development phases. This reflects the housing mix arrived at by blending the 2019 SHMA recommended mix for Crawley and Horsham, albeit without providing the full breakdown as applied to different tenures.

	Rented affordable housing	Affordable home ownership	Open market housing
1 bedroom home	32%	25%	7%
2 bedroom home	30%	38%	28%
3 bedroom home	28%	27%	40%
4 bedroom home	10%	10%	25%
Total	100%	100%	100%

**Blended housing mix for Horsham and Crawley (derived from SHMA)**

The applicant's Infrastructure Delivery Plan sets out in Figure 5.1 a blended mix in percentage terms expressed as percentage of all homes to be provided. This corresponds with the blended mix derived from the SHMA shown in the table above on the basis that the affordable housing element is 35% of the total. However, as explained below, the affordable homes target should be 40% of the total. Figure 5.2 in the Infrastructure Delivery Plan similarly gives an illustrative housing mix based on 35% of all homes being affordable as opposed to a 40% affordable housing quota. Therefore, Figures 5.1 and 5.2, which are presented as illustrative, should be recalculated to reflect the 40%/60% split instead of the 35%/65% split. This recalculated illustrative mix should then be reflected in the Section 106 agreement.

b. The draft Heads of Terms (dHoT) states that the development will provide for the delivery of 35% Affordable Housing, of which 70% will be Social and Affordable Rented and the remaining 30% in intermediate forms such as Shared Ownership. This conflicts with eLP Policy 39 part 1(c) and eLP Policy HA2 part 2(a) which require a minimum 40%, in recognition of the affordable housing requirements in both Horsham District and Crawley. It is acknowledged that the eLP has limited weight, however weight should also be given to evidence underpinning the eLP's preparation. The eLP Viability Appraisal Addendum (November 2024) is published in the examination library as document HDC15 and concludes that even with 40% affordable housing required, the residual land value reflects a sufficient uplift on land value therefore the development remains viable and deliverable (see HDC15 Table 1). Considering the above, the following is advised:

i. The Council's policy position is that 40% AH is required on this site, and this is supported by the Council's evidence on need and viability,

and equivalent evidence underpinning the adopted Crawley Borough Local Plan. Therefore, the dHoT should be amended to include a requirement of 40%, consistent with the eLP and also with the Crawley Borough Local Plan (Strategic Policy H5).

- ii. The dHoT should also clarify that all reserved matters applications involving residential will be required to deliver the requisite AH target, of which (for all phases) 70% will be social and affordable rented and the remaining 30% in intermediate form. It should further say that AH for all phases will be required to come forward at the same pace as the market housing (i.e. not be left until later in the build period).
- iii. The inclusion of a commitment to cap affordable rented rent at the Local Housing Allowance is supported.
- iv. An amendment to the dHoT may be necessary to reflect that the Council has agreed with Crawley Borough Council that account should be taken of the affordable housing needs from Crawley Borough. The councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision, and it is expected that the councils will work with the applicant to include the details of what's agreed in the S106 Agreement.

*Specialist housing*

**5.4** HDPF Policy 18: Retirement Housing and Specialist Care encourages provision of these types of development in appropriate locations. The eLP Policy 42 and its supporting text also recognises the importance of such provision. eLP Strategic Policy HA2 part 2(a) requires provision of homes for older people.

**5.5** The Planning Statement states that the delivery and design of Class C2 specialist housing will be confirmed at the RM stage. It is urged that a clearer commitment to such provision at the outline application stage is made, to include extra-care and other independent living provision as per evidenced needs. The approximate number of such homes, land area to be set aside, and the distribution of these between development phases, should be stated. It is suggested that this is stipulated in the S106 Agreement. Further advice should be sought from WSCC on this matter.

**5.6** The commitment for all homes to meet the Nationally Described Space Standards, and for all affordable homes to comply with Category M4(2) of Building Regulations Approved Document M (adaptable homes) is supported. Whilst acknowledging there is no adopted policy requirement to do so, the provision of 5% of the affordable housing provision should ideally be provided as Category M4(3) i.e. be fully wheelchair accessible. The need for this has been documented in the Northern West Sussex Strategic Housing Market Assessment.

*Self-build and custom-build housing*

**5.7** There is no specific policy within the HDPF requiring custom- and self-build housing (CSB). The eLP Policy 38: Meeting Local Housing Needs seeks provision of CSB in accordance with the latest demand on the Council's Self- and Custom-Build Register. There is also support in the NPPF and Planning Practice Guidance for CSB. As of April 2025, there were 118 residents of Horsham District and 48 non-residents on the register. The Planning Statement (paras 7.3.16 to 7.3.19) suggests 2.5% of

residential plots will initially be sought for CSB across phases, and a CSB Marketing Strategy will be secured by condition. This approach is supported.

#### *Gypsy & Traveller Accommodation*

**5.8** HDPF Policy 22: Gypsy and Traveller Sites is the adopted policy for providing Gypsy and Traveller sites. In addition to allocations, the policy outlined that objectively assessed needs would be identified in a Site Allocations DPD. Such a DPD was not ultimately progressed, as work instead began on a comprehensive local plan review which is now the eLP. However the principles remain material: in particular, (d) supports the allocation of sites in strategic development sites or stand-alone allocations, and (e) and (f) recognise the role of publicly owned land to be developed to meet Gypsy, Traveller and Travelling Showpeople needs. Part 3 also states that the Council will work with neighbouring authorities to make appropriate provision to meet the requirements for Gypsies and Travellers. HDPF Policy 23: Gypsy and Traveller Accommodation sets out criteria to inform the location and design of sites.

**5.9** The eLP includes Strategic Policy 43: Gypsy, Traveller and Travelling Showpeople Accommodation. The policy sought to allocate sites towards meeting identified need. One of these allocations is for 15 pitches at Land West of Ifield. This is confirmed in Strategic Policy HA2.2(a).

**5.10** The position on current need is as follows. 50 Gypsy and Traveller pitches are identified as being needed for the first five years of the eLP (2023-2028). Against this need, the current pipeline supply in Horsham District (based on recent permissions) is 12 pitches. There therefore remains a significant unmet need.

**5.11** It is therefore welcomed that the Planning Statement confirms the provision of Gypsy and Traveller (G&T) pitches, and that one way of providing this is shown on the illustrative masterplan. It is also welcomed that there has been liaison with Friends, Families and Travellers Group on this provision, although the outcome of this engagement appears to not be reported. Notwithstanding this, Policy Team has the following outstanding concerns for further address:

- a. The Draft Heads of Terms proposes two alternative cascade approaches for delivering the G&T pitches, both involving time-limited windows for agreement with, respectively, a Registered Provider or WSCC, and the identified site(s) reverting to standard residential uses if no partner can be secured and off-site contributions being made. Neither of these options are acceptable, as they depend entirely on the involvement of third parties, and do not allow the option of a private buyer/provider (for example, a Gypsy or Traveller community). It is further unclear how (should it come to it) a commuted sum intended for off-site provision could be used to secure the delivery of pitches given the applicant has not identified any such alternative site, which they would need to purchase to ensure delivery.
- b. The land use parameter plan, which is definitive, identifies an area of search for the provision of G&T, which entirely overlaps with standard residential use and is spread across two land parcels (M7 and M8). Without much stronger assurance on point 1 above, this does not give any certainty of delivery. The Policy Team suggests this makes the risk of non-delivery is unacceptably high given that developers will need to fully understand planning requirements

and liabilities when purchasing their land. Consideration should be given to resubmission of the land use parameter plan to identify a specific site, consistent with the illustrative parameter plan, to provide certainty.

- c. It is noted that all documentation refers to provision of 'up to' 15 G&T pitches. Given the unmet needs identified, this qualification is not satisfactory. It is requested that relevant conditions and legal agreement clauses refer to either '15 pitches' or 'at least 15 pitches'. If the applicant considers that 15 is too high a number for a single site, they have the option within identified parameters to provide more than one site.
- d. The Design Code (section 3.2.1) lists provision of G&T site(s) as 'Reserved for Future Design Stages'. This is inconsistent with section 3.2.5 which specifies it as an outline/hybrid planning application coding. This should be corrected/clarified to make clear that the requirement applies at outline application stage.

## **6. Environment, nature, landscape, design and heritage**

### *Environment, nature, landscape and heritage*

- 6.1** The relevant HDPF policies are considered to be Strategic Policy 24: Environmental Protection; Strategic Policy 25: The Natural Environment and Landscape Character; Strategic Policy 26: Countryside Protection; Policy 31: Green Infrastructure and Biodiversity; Strategic Policy 32: The Quality of New Development; Policy 33: Development Principles, and Policy 34: Cultural and Heritage Assets.
- 6.2** The relevant eLP policies are considered to be Strategic Policy 11: Environmental Protection; Strategic Policy 12: Air Quality; Strategic Policy 13: The Natural Environment and Landscape Character; Strategic Policy 14: Countryside Protection; Strategic Policy 17: Green Infrastructure and Biodiversity; Strategic Policy 19: Development Quality; Strategic Policy 20: Development Principles, and Strategic Policy 21: Heritage Assets and Managing Change within the Historic Environment.
- 6.3** The Policy Team notes that the illustrative masterplan and parameter plans broadly reflect the vision for a landscape-led development, with a significant portion of the site dedicated to nature enhancement. The case officer will be aware of the requirement of the Environment Act 2021 whereby developments must achieve a minimum 10% net gain in biodiversity. Attention is also drawn to the eLP Strategic Policy HA1 which expects a minimum 12% biodiversity net gain on strategic sites.
- 6.4** It is anticipated that comprehensive comments on these aspects of the development will be provided by the Council's specialist officers: the Landscape Officer, the Ecology Officer, a Conservation Officer and an Environmental Protection Officer. The Policy Team do not therefore propose to comment on these aspects of the proposals. It is noted that the applicant has worked with Natural England towards mitigating impacts on the Bechstein Bat population known to inhabit the area, and it will be for Natural England to comment on whether all such requirements are likely to have been met. It is also noted that the proximity of the site to Gatwick Airport will necessitate appropriate noise impact mitigation, to take account of both existing airport operations and future conditions following implementation of the Gatwick Northern Runway DCO.

## *Design*

**6.5** The Policy Team overall supports the Design Code subject to some matters of detail. Such matters have been separately discussed with the Case Officer.

## **7. Climate change**

**7.1** HDPF Policies 35, 36 and 37 form a suite of policies concerned with climate change, appropriate energy use and sustainable construction. These are not repeated in detail, as it is recognised that technologies and best practice have moved on since adoption of the HDPF. However, Policy Team would highlight that an overarching 'energy hierarchy' (as set out in Policy 36) should be observed, summarised as the 1- 'lean' (less energy use), 2- 'clean' (supply energy efficiently) and 3- 'green' (use renewable energy) hierarchy.

**7.2** In the eLP Strategic policies 6, 7 and 8 provides a similar policy framework, including the lean/clean/green hierarchy. Key requirements are the submission of a Sustainability Statement (Policy 6) and an Energy Statement (Policy 7).

**7.3** Having regard to these policies, the approach proposed by the applicant is broadly supported. A commitment is made to achieving the Future Homes Standard which is welcomed and should be secured by condition. A sustainability statement is included in the application which recognises elements that will need to be addressed at reserved matters stages. An energy statement is also submitted which sets expectations for increasing energy efficiency throughout site layout, building design and energy supply. Full regard should be had to these matters at reserved matters stages.

**7.4** Homes England have committed to 1/ a detailed technical feasibility study, 2/ economic and financial modelling and 3/ concept design of a preferred option, and agree to the principle of a prior to occupation condition of a site-wide energy statement. It is suggested that these could be confirmed through appropriate conditions.

**7.5 In summary**, the Policy Team is content with the approach taken subject to further development of an energy strategy based on the energy statement and following further work on options being considered. Conditions will ensure these are followed through at reserved matters stages.

## **8. Water neutrality**

**8.1** The eLP includes Strategic Policy 9: Water Neutrality. This policy was introduced as a result of the Natural England Position Statement issued in September 2021 ('NEPS') which explained that it could not be concluded that abstraction by Southern Water at Hardham on the River Arun was not having an impact on the internationally protected Arun Valley sites.

**8.2** However, as the case officer will be aware, the NEPS was withdrawn by Natural England on 31 October 2025. At the time of writing, the Council is reviewing the

evidence provided in support Natural England's update position and will soon set out further advice on the matter which will in turn inform decision-making. In this circumstance, it is advised that eLP Strategic Policy 9 is given very limited weight.

## **9. Infrastructure**

**9.1** HDPF Policy 39 is the Council's adopted policy on infrastructure provision and seeks to secure enhancements to local infrastructure in time to serve development phases in a timely manner. The eLP Policy 23 closely reflects the adopted policy. In the eLP, Strategic Policy HA2: Land West of Ifield sets out several infrastructure requirements.

**9.2** The submitted Infrastructure Delivery Plan (IDP) sets out infrastructure requirements and phasing. Policy Team has the following concerns:

- a. The assessment only appears to extend to a 5km radius whereas the impact of the development is likely to extend beyond this, for example relating to hospitals, specialist education needs, sporting facilities, etc.
- b. There does not appear to be reference to impacts (or lack thereof) on the strategic road network which would likely be outside the 5km radius. This should, for avoidance of doubt, be included.
- c. With regards education provision, it is noted that the applicant proposes one 3-form entry primary school and one 6-form entry secondary school expandable to 8-form entry. This does conflict with Policy HA2 part 2(e) as proposed to be modified and evidence supporting the eLP which requires two 2-form entry primary schools and a minimum 8-form entry secondary school expandable to 10-form entry. The Policy Team is aware that more recent discussions with WSCC as Local Education Authority may have led to agreement to just one school, provided the proposed housing mix is maintained through the reserved matters stages. This position is therefore considered to be potentially acceptable, provided there is proof of agreement between the applicant and WSCC on this matter. WSCC should, as suggested in the applicant's IDP, be consulted on the appropriate phasing of primary provision, and whether there is adequate capacity in existing provision to accommodate early phases.
- d. It is not always clear whether the full range of community infrastructure has been assessed. Whilst libraries, community halls have been included, facilities with a variety of potential uses, e.g. swimming, hockey and MUGAs are not clearly defined, and there is no consideration of existing allotment provision. Full consideration of Green Infrastructure requirements, and the extent to which they are met, should be based on advice from the Council's Leisure and Culture Team.
- e. Para 4.7 confirms that a GP premises will be required and para 6.8 suggests the need for ongoing engagement with the Integrated Care Board (ICB). We are unclear whether this will be standalone with land expected to be provided on site, or whether this would be through enhancement elsewhere. How the NHS expect this will need to be achieved should be made clear. The Council's previous engagement with the ICB indicated an onsite facility may

be appropriate or contributions to expansion of existing Crawley facilities may be more appropriate. Ongoing engagement will be necessary to ensure conditions and the S106 agreement are fit-for-purpose in this respect.

- f. There are concerns on para 6.7. Proposals for the Local Leisure Centre need to set out more detail around what would form part of this facility. HDC Leisure and Culture team should be consulted on the detail of this arrangement. It cannot be assumed that local authority provision will be made as the Councils have contractual obligations with their operators. Offsite delivery is not supported. School facilities should be in addition to other sports and leisure provision on site to meet the need generated by the development.
- g. Proposals for development phasing is broadly supported. Providers of infrastructure will need to confirm feasibility of delivery as envisaged, for example it may be more appropriate to provide early mitigation at existing local GP surgeries rather than provide a premises which remains unoccupied for a time. A concern is however raised that the delivery of most of the sports pitches will be in later phases – it is not clear how the c.2,700 homes delivered by that point will be provided for.

**9.3** Notwithstanding the above, the IDP appears to include all infrastructure set out in Policy HA2, albeit some concerns remain as to whether the provision and delivery of some sport and leisure facilities is sufficient. Comments on particular types of infrastructure are set out elsewhere in this representation and are not repeated further.

**9.4** Policy HA2 part 10 states that close liaison with water treatment utilities companies must be undertaken, including clear agreements on the phasing of development, to ensure that a new or expanded Wastewater Treatment Works (WwTW) is provided to provide timely additional capacity for the sewerage network. There does not appear to be submitted evidence of this, therefore appropriate conditioning will be required to ensure that the necessary works are undertaken.

## **10. Transport and movement**

**10.1** HDPF Strategic Policy 40: Sustainable Transport sets out that development proposals which promote an improved and integrated transport network, with a rebalancing in favour of non-car modes, will be supported. The policy then sets out several policy criteria variably requiring minimisation of travel and encouraging or requiring delivery of walking, cycling and public transport measures. HDPF Policy 41 sets out principles for parking (for cycles and cars) but does not set out specific standards.

**10.2** In the eLP, Strategic Policy 24: Sustainable Transport sets out similar criteria albeit in more detail. It references the need to demonstrate home working capabilities, to prioritise walking and cycling including well designed routes, quality provision for bus travel, and to fully explore opportunities for rail travel. The policy references key design guides. It also requires development of this scale to be accompanied by a transport assessment and Travel Plan. Also, Policy 25: Parking seeks well-designed parking for cars (including Electric Vehicles) and cycles, with

reference to currently adopted standards i.e. WSCC Guidance on New Parking Developments.

**10.3** The eLP Strategic Policy HA2: Land West of Ifield further sets out the Council's policy on the site. The supporting text to the policy expects the development to be served by extended high quality and high frequency Fastway bus services, and to integrate with the wider urban form of Crawley. The key criterion in the policy requires submission of a comprehensive transport strategy, submitted as part of the masterplan, to cover walking and cycling priority, the Crawley West Multi-modal route, extensions to Fastway, electric vehicle use, and a comprehensive Travel Plan and Construction Travel Plan.

#### *General*

**10.4** Broadly, the illustrative masterplan proposals and movement parameter plan align well with the policy framework outlined above. It is noted and welcomed that these reflect the vision to achieve a 15-minute neighbourhood and provide sustainable transport links to/from destinations outside the site. It provides a strong basis to 'bake in' sustainable travel habits, by largely demonstrating directness and convenience for non-car modes and exploiting opportunities to extend Fastway bus services to serve the whole of the new development.

**10.5** However, it is questioned whether the application includes a *comprehensive transport strategy* as required by eLP Policy HA2 part 8. Whilst HA2 does not have the weight of adopted policy, it provides criteria to enable the Council to properly assess the proposal against NPPF requirements and therefore conflicts are not immaterial. It would also help articulate how the various travel modes integrate to enable smooth interchanges. Specific criteria that do not seem to have been met are:

- a) A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority over motorised traffic, and integrated with the existing and wider network will be delivered and maintained; and
- b) A comprehensive Travel Plan and Construction Travel Plan to be agreed by the Council and Local Highway Authority is submitted, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy.

**10.6** On review of the Transport Assessment and other submission documents, there are areas of concern regarding details that, if unresolved, could present policy conflicts. The following advice and requests for further information and modification of submission materials is given (paragraph references relate to the Transport Assessment unless otherwise stated):

#### *Cycling and walking*

**10.7** As mentioned above, it would be helpful for the purposes of assessing the proposals to have received a comprehensive walking and cycling strategy. Whilst most of the information that might be expected in this may be in other documents (the Transport Assessment (TA), Umbrella Travel Plan and Design Code), the case officer may wish to request these such that the suite of measures can be assessed

as a whole and referred to in a condition and the S106 Agreement. Alternatively, the strategy could itself be secured by condition or legal agreement.

**10.8** The provision of sufficient, high quality cycle parking is of critical importance. The Umbrella Travel Plan (UTP) para 5.13 sets out that provision will exceed WSCC guidance which is welcomed, and any outline permission should be conditioned to specifically require adherence to this (as there is no guarantee of the UTP being implemented as currently envisaged). Also, confirmation should be sought that at least some cycle parking will be covered (weatherproof) in association with all non-residential uses as this is generally not specified in the Design Code.

**10.9** Whilst the internal active travel routes are in line with earlier discussions, there is limited information on delivery of improvements to routes outside the site – whilst funding is identified for specific route improvements outside the site, there are no preliminary feasibility or design proposals, and little steer on delivery of these. It is noted that the primary pedestrian/cycle route (dark green on the parameter plan) does not seem to continue past the site boundary – this will need correcting to show the whole route. It is also noted there is no provision for the cycle route between the site and Mowbray / Horsham Town; clarification as to how this has been considered should be given.

#### *Car parking*

**10.10** A proposed 10-30% reduction in the WSCC residential adopted car parking standards, with scope for further reductions at reserved matters stage and on-street unallocated parking, is supported in principle. The use of unallocated street parking is supported as a flexible and space-efficient means of achieving well designed parking. Conditions should be considered to ensure appropriate parking design, and restrictions as appropriate both in terms of car-free type restrictions and parking enforcement, are carried through to reserved matters applications.

**10.11** EV parking is proposed as 1 space per dwelling, this is supported albeit flexibility to increase this requirement, potentially for all spaces to be EV-ready, may be needed at reserved matters stage depending on future EV take-up. Noting that on-street unallocated parking is proposed, clarification should be sought as to how much street EV charging will be required at reserved matters stage, including additional provision for visitor EVs.

**10.12** The intention to reduce non-residential parking from adopted standards, with potential to limit leases to employers to 5 years (with the idea that provision can reduce over time), is supported in principle. However, it should be clarified whether there are safeguards to ensure prospective employers are not disincentivised to locate in the area due to lack of parking, and to maintain viability of businesses.

#### *Buses*

**10.13** The strategy for providing high frequency bus services to key destinations through development of the Fastway network (Chapter 6) is supported. However, there is limited information on how the delivery of these as envisaged in the strategy can be assured. Para 6.25 of the TA states:

*“...it is proposed that the bus strategy would be secured through a Level of Service agreement included within the S106 agreement. This LoS agreement will set out*

*minimum requirements for the service and key destinations which should be served. Funding for bus services by Homes England will be subject to approval of the Full Business Case by HM Treasury.”*

**10.14** It is not clear where the draft costings are for achieving the bus strategy. It is also concerning that the funding is subject to HM Treasury approval as this gives no assurance that adequate funding will be forthcoming. Further information and assurance should be sought on these matters, along with a Statement of Common Ground with Metrobus to provide assurance of the commitment of Metrobus to implement the suggested strategy.

**10.15** The feasibility of a local ‘town’ bus service should be considered, which goes into the new residential estates, for future occupants with mobility issues or who would find it difficult to walk the whole distance to one of the bus stops currently proposed. This could provide just local access the new neighbourhood centre and connect with Fastway services. This could be important from an equalities perspective. It is suggested that provision is made for this within the Section 106 Agreement.

#### *Rail*

**10.16** Improvements to Ifield Station are supported (para 6.30). However the Feasibility Study referred to does not appear to be available, hence further information may be needed on costings. Evidence of discussion and agreements reached with the station operator should also be sought to corroborate the extent of agreement to the delivery of these measures.

#### *Travel Plan*

**10.17** It is questioned whether the Umbrella Travel Plan (UTP) is sufficiently comprehensive. The principles set out seem appropriate, however measures may not be precise enough to be reflected in an enforceable set of legal undertakings.

**10.18** It is noted that the UTP is presented as a ‘living document’ therefore discussion and ultimately agreement to a firm set of actions will come at a later stage. It is urged that a more developed Framework Travel Plan is secured by condition, such that due consideration can be given to the details.

**10.19** It appears that no actual mode share targets are included in the UTP, rather this is deferred to reserved matters stages (UTP para 4.6). This should be challenged, as the UTP may otherwise lack effectiveness. It is however stated that interim targets will be based on the mode shares used in the TA to calculate trip generation, which assume high non-car mode shares and low car mode shares compared with the norm. Whilst supported as an aspiration, there should be a robustly enforceable monitoring regime and contingency measures embedded in the legal agreement to ensure appropriate actions should these targets not be achieved.

**10.20** It is questioned whether the Travel Plan Coordinator will have sufficient time to maintain momentum on the basis of a 1 day a month work pattern, given the list of tasks/challenges in achieving the mode share targets (as set out in para 7.7). It is suggested that further discussion should be held on this point when agreeing the details of the relevant S106 clause.

**10.21** It is noted that the Construction Traffic Management Plan in effect incorporates a Construction Travel Plan for Phase 1. This has not been reviewed by the Policy Team; advice from WSCC should be sought.

#### *Transport modelling*

**10.22** The TA states (para 9.10) that:

*“...it can be concluded that the transport modelling completed for the emerging Local Plan 2039 in the Horsham District outlines that the WoI development will not result in a residual negative impact on the operation of local junctions to the Site.”*

**10.23** This statement is incorrect. As set out in Section 6.5 of the Horsham Transport Study that was prepared to support the emerging HDLP 2023-40, the model output indicated a number of junctions within Crawley increasing in congestion (both mitigated and unmitigated), primarily due to the West of Ifield site. It also suggested that sustainable transport mitigation on the Ifield Avenue route may reduce the need for physical highway mitigation.

**10.24** It is not clear how key junctions and movement corridors are impacted beyond any technically ‘severe’ impact and how off-site mitigations are meant to work as a whole. Concern also remains over how a significant increase in traffic on Ifield Avenue (the main off-site access into Crawley) can be managed. The Policy Team requests that a non-technical summary of the Transport Assessment which provides a clear narrative of the transport modelling should be submitted to the Council, to clearly explain what the local highways impacts are in terms of flow increases, and put forward a coordinated package of physical measures to mitigate the increases in traffic on local roads.

**10.25** To expand, it has not been possible to assess the degree of change arising from the development on this and other links. This is because whilst LinSig and Junction 9 modelling outcomes have been reported, this does not make transparent the actual increases in traffic expected on local roads from the development (or the cumulative increases when other traffic growth is considered). It is only from this information that wider environmental and potential safety impacts arising from greater traffic flows can be assessed, and appropriate strategies then considered – in particular, sustainable transport mitigation measures on the Ifield Avenue corridor as recommended by the Horsham Transport Study. As well as Ifield Avenue, there is insufficient attention given to changes to traffic flow on Rusper Road to the west of the site and Ifield Wood and Charlwood Road north of the new CWMMC junction.

**10.26** Subject to the above, consideration should be given to conformity with NPPF paras 109(a) & (b) and 115(a) & (b) which make explicit that achieving good access for sustainable modes should extend beyond the site boundary and into the wider area, and NPPF para 117, which makes clear that applications for development should *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, as well as facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.*

**10.27** On this basis, it may be necessary to secure upgrades to pedestrian and cycle priority beyond the application site boundary, for example improvements to pedestrian crossings, air quality monitoring, environmental-driven changes to road

design, public realm improvements, etc. Specific measures should be agreed in light of the further evidence requested, in consultation with WSCC and Crawley Borough Council, and included in legal agreements.

**10.28** Furthermore, mitigations thus far proposed are based not on a worst-case scenario but on a 'decide and provide' basis that assumes significant reductions on typical modal shares. If, on presentation of clearer analysis, it is agreed that mitigation is not necessary on some or all of these routes, clear mechanisms should be in place whereby future monitoring of traffic flows triggers potential further off-site mitigation measures to be delivered by the master developer (Homes England) or a reserved matters applicant. This could be provided for in S106 and S278 agreements.

## **11. Healthy Communities inc. open space, leisure & sport – loss of golf course**

**11.1** The application proposal would result in the loss of Ifield Golf Course (IGC), which is a mature landscaped 18 hole golf course in active use. Ifield Golf Club, which holds the leasehold currently and manages the course, has a membership exceeding 500.

**11.2** HDPF Policy 43: Community Facilities, Leisure and Recreation sets out the adopted policy on the loss of leisure facilities. It states in part 3 that loss of sites currently or last used for the provision of community facilities/leisure/cultural activities will be resisted unless equally usable facilities can be provided nearby. Where it cannot be demonstrated that the loss is surplus to requirements, either

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

**11.3** Similarly, eLP Policy 28: Community Facilities and Uses set out criteria to HDPF Policy 43, with additional references to replacement facilities having appropriate capacity, or the use of the site as a community facility or service no longer being feasible.

**11.4** Policy 43(3) and the equivalent eLP Policy 28 align closely with NPPF paragraph 104, which again seeks to resist loss of these facilities unless exceptions criteria are met. NPPF para 104 states that such development must meet any one of three policy limbs to be acceptable:

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

**11.5** The eLP site allocation policy HA2 2(g) states that the provision of appropriate mitigation for loss of Ifield Golf facilities will be required in the absence of site-specific evidence demonstrating the surrounding area has capacity to accommodate its loss.

**11.6** A study 'Golf Supply and Demand Assessment' (dated Feb 2021) and subsequent Update (dated Dec 2022) were undertaken by KKP Consultants on behalf of the Council to support the preparation of the eLP. This provides the context for further work undertaken by the applicant and have also informed the responses that follow.

**11.7** The policy comments that follow are ordered to correspond to the three limbs of NPPF paragraph 104, but are also intended to cover the local policy framework as described above.

*Paragraph 104(a) – whether the golf course is surplus to requirements*

**11.8** The applicant's evidence is presented as the 'Golf Needs Assessment' (June 2025). This acknowledges that IGC "is not deemed surplus to requirements" however it concludes that "the overall position is considered marginal" which is given as justification for not warranting a full replacement 18 hole golf course. The Policy Team agrees with the applicant's conclusion that the golf course is not surplus to requirements, but does not agree that an argument of marginality, which is itself questioned, lessens the onus on the applicant to demonstrate that limbs (b) and (c) are met.

**11.9** Notwithstanding common agreement that limb (a) is not met, the Policy Team has assessed the quality of the evidence and raises the following concerns:

- a. England Golf's 'Regular Golfer Demand' (RGD) tool has been used to assess surplus/deficit, firstly for the district / borough areas (Horsham and Crawley), and then within a 20-minute catchment area measures from IGC. RGD provides an index in respect of England Golf's regular participation measure of twice per year (a score of 100 means there is a balance between supply and demand, below means a potential surplus in supply, above means a potential deficit in supply). Crawley Borough's RGD index is stated to currently be 394 and Horsham's is stated to be 90 rising to 108 if IGC is closed. However, an assessment to reflect closure of both IGC and the Horsham Golf & Fitness (HG&F) 18-hole course on the same basis has not been undertaken; such an assessment would logically give an output much greater than 100 for both Horsham and Crawley (i.e. show a clear deficit).
- b. For the 20-minute catchment area, the RGD methodology appears to be different to that used for the district and borough areas – it uses a twice in a 28-day period measure – and does not therefore accord with England Golf's approach. Even on this basis, the supply/demand balance is such that a surplus of provision within the catchment does not exist (para 1.164).
- c. In addition to this the ratio of courses in the core 20-minute catchment would, at best, be 0.48 per 1,000 population after closure of both IGC and the 18-

hole course at HG&F (para 1.164), which is lower than both the county and national average.

- d. Furthermore, the evidence on whether there is capacity at existing clubs/courses within the catchment is unsubstantiated. Paragraphs 1.98 to 1.119 of the GNA gives commentary on capacity and availability at other courses within the 20-minute catchment, reporting that there is an absence of waiting lists at most if not all courses (the status of waiting lists is listed for each in Table 2.12). It then states (paragraph 1.119) that it is not unreasonable to assume that those active IGC members seeking to continue to play could be accommodated at courses in the core 20-minute catchment and wider afield. These statements do not appear to be supported by any club membership figures nor any statements from the clubs referred to. It cannot be assumed that having no waiting list means that there is significant further capacity for new members. Further evidence is requested on this point or, alternatively, the assumption of surplus capacity at other clubs should be revoked.
- e. It is also of concern that most of the analysis of supply versus demand includes the HG&F course as one of the 18 hole 'standard golf course' alternatives. It is recognised that recent planning decisions relating to golfing facilities have changed since studies have been undertaken. However, there is insufficient reference in the GNA to the future closure of the 18-hole Horsham Golf & Fitness (HG&F) course following the granting of permission on appeal for alternative uses on that site. The 8-paragraph analysis that is given to take account of the closure (paras 1.163 to 1.170) does not appear to sufficiently acknowledge the combined impact. The report needs updating such that it is underpinned by an up-to-date baseline (whereby Horsham Golf & Fitness will be reduced to a 6 or 9-hole short format golf course and/or nine hole pitch and putt golf course once the extant permission is enacted).

**11.10** Overall, the Policy Team notes there are shortcomings in the methodology used in the GNA Part A such it does not present a precise and accurate picture of the supply versus demand position. It is agreed that golfing needs are changing, which will affect the nature of appropriate mitigation should IGC be lost, however this is not relevant to the test of *clearly showing the open space, buildings or land to be surplus to requirements*, rather it is a consideration for NPPF paragraph 104 limb (b) which is covered below. It is therefore requested that the GNA Part A is resubmitted to address these shortcomings and is clear on what the like-for-like deficit would be.

*Paragraph 104(b) – whether there is replacement by equivalent or better provision in terms of quantity and quality in a suitable location*

**11.11** As mentioned previously, it is already established that IGC is not surplus to requirements; furthermore, it has not been clearly demonstrated that there is any significant capacity within the 20-minute drivetime catchment to accommodate displaced members from IGC. Therefore, it falls to assessing the proposals against NPPF para 104 limbs (b) and (c). The main evidence paper supporting the application is Part C of the GNA – 'Potential Golf Investments Following the Closure of Ifield Golf Course' (FMG Consultancy), to which the following comments refer. Considering limb (b):

- a. The **first consideration** is whether mitigation at Tilgate and Rookwood means sufficient capacity can be provided for displaced IGC golfers (indicative of 'quantity'). Whilst such mitigation measures are considered acceptable in principle;
  - i. On current evidence, it is not sufficiently clear what the existing and potential future capacity at Tilgate is. The assumption that 20,000 rounds are played each year at Tilgate is an estimate based on a constraint of poor drainage and resulting days closed due to flooding/waterlogging or under winter restrictions. This needs to be verified by the course operators. Furthermore, the GNA estimate of improved drainage increasing this capacity to 35,000 rounds per annum is not sufficiently evidenced – the figures used to calculate this estimate (Part C of the GNA Appendix A part 5) are not clearly explained, unsourced and therefore appear unsubstantiated.
  - ii. The GNA assumes that 38,000 rounds per annum is the target for golf courses and this appears to be relied upon as a means of identifying additional capacity at Rookwood (currently c.33,000 rounds per annum). However, no data source is provided to verify this, and it is noted that part C of the GNA at Appendix A part 5 indicates 36,000 per year is just below the average for a proprietary course in UK. It also does not follow that the theoretical headroom quoted can in reality translate into the Rookwood course increasing their capacity within a reasonable timescale; this will depend on the specifications of the course and should, at minimum, be corroborated by the course operator.
  - iii. Overall, when assuming absolute capacity, even if the assumed additional 15,000 rounds per annum at Tilgate and 5,000 rounds per annum at Rookwood were realised by virtue of course enhancements, it appears that this is still some 15,000 rounds per annum short of what would be 'lost' at IGC. On current evidence, it is unclear how this degree of shortfall can be met elsewhere.

**11.12 In summary**, it is considered the applicant must submit further evidence to demonstrate that sufficient new capacity can be achieved at Tilgate Park and Rookwood golf courses to absorb the displaced need arising from IGC on its closure.

- b. The **second consideration** is whether the proposed mitigations are capable of achieving equivalence of quality and being delivered in the manner envisaged. The Policy Team cannot offer informed comment on the quality or effectiveness of mitigations proposed, but it seems remiss for the FMG report to not include any technical details to demonstrate feasibility and effectiveness of measures. It is also strongly urged that the applicant evidences corroboration of the suggested packages from the respective course operators and/or seeks comment from HDC's Parks and Countryside team. In terms of delivery, the following points are made:
  - i. The GNA Part D ('NPPF Para 103 Assessment DRAFT', July 2024) infers that the public ownership of Tilgate and Rookwood effectively offers a guarantee of improvements being delivered. Both courses are operated by contracted specialist operators, and whilst the applicant's consultant has had discussions with those operators, in neither case is there any evidence of any firm strategy or timetable of improvements having been agreed. It must also be recognised that local authority responsibility for estate management is separate from

its planning function, and public interest / duty of achieving best value would need to be demonstrated by the respective councils.

- ii. A commitment from the applicant to provide funding via S106 is welcome, but there remains significant risk of the funds remaining unspent whilst there is no agreement with the respective operators and landowners, and given the cost schedules are preliminary and may change. Clarification is needed as to the legal mechanisms for securing future funding and works for Tilgate and Rookwood given they are owned by local authorities and in the absence of planning permissions for these works.

**11.13 In summary**, it is considered the applicant must submit evidence of agreements reached with the respective operators and landowners, including preliminary programmes for the planned mitigations at Tilgate and Rookwood, to ensure these mitigations can be well progressed ahead of the closure of IGC. An alternative means of assurance would be the submission of planning applications for the works necessary for the agreed suite of mitigation measures. The further submissions should also include evidence of the effectiveness of measures proposed, to include appropriately detailed technical reports to demonstrate effectiveness and feasibility, and corroboration of this from the course operators or landowners.

- c. The **third consideration** is whether, as argued by the applicant in light of the Mapledurham judgement (GNA Part D, paragraph 4.2 and Annex B), combining partial offsetting of quantitative loss with qualitative off-site enhancements is sufficient to demonstrate that the application meets the requirements of NPPF 104(b). Evidence presented in the GNA on the changing nature of golfing needs, relating to changing demographics and the 'golfing journey', is in broad terms not disputed. However, the feasibility of delivering the planned off-site mitigations has not been demonstrated. If this evidence gap is resolved, and sufficient off-site mitigation aimed at attracting significant numbers of new golfers can be demonstrated, there is scope for limb (b) to be met.

*Paragraph 104(c) – development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use*

**11.14** The applicant has advanced the argument that provision of open space, leisure and sports facilities over and above policy requirements together with off-site mitigation at Tilgate and Rookwood sufficiently offsets the lack of full like-for-like replacement of the golf course. However, the development of the golf course will be residential led, with most of the on-site sports and recreation forming part of the outline application intended to meet primarily the needs of the development whilst providing some wider benefits. Whilst agreeing that the wider benefits aspect may be material to the planning balance, the Policy Team is concerned that these benefits may have been overstated, and that the evidence for this is not, as stands, sufficient. The following points explain this further:

- a. It is agreed that provision of natural and semi natural green space, parks and gardens, other multifunctional green space and provision for young children is likely to be surpassed (albeit there are separate concerns that the illustrative masterplan shows NEAPS in close proximity to LEAPS). It is not however

clear the extent of overprovision, for example whether residential amenity space such as landscaping and verges has been counted (it shouldn't be). There are also concerns over the useability of some of the space in respect of flood risk, for example in the Mole Valley Park where flooding and wildlife protection may limit public accessibility.

- b. With regards formal sports pitches, we are unclear on the details of provision and delivery. The application does not appear to include the Sports and Recreation Strategy which is referred to in various other documentation. Notwithstanding, illustrative proposals (see GNA Part B, Table 2) do indicate provision of many such facilities against baseline requirements, but there is concern that some of this provision double-counts playing pitches due to assumed dual community/school use (an assumption generally rejected by education providers and constrains daytime access) (see Table 2 rows for grass football, 3G AGP, cricket, tennis and sand-based AGP). Furthermore, the draft Section 106 Heads of Terms states that specifications for and delivery of the sports hub are to be determined at reserved matters stage which poses a risk of non-delivery. There is also little information regarding provision and delivery of The Meadows sports hub – presumably because this relates to later phases, nevertheless if this forms part of the offset relating to the loss of IGC, more information and assurance of what is to be provided should be sought.
- c. The GNA Part B (see Table 3/paragraph 5.32, Table 5/paragraph 5.46 and paragraph 5.52) implies that a Local Leisure Facility of c. 3,400sqm will be provided which, illustratively, will contain:
  - 4-6 court sports hall;
  - a 4 lane swimming pool;
  - 40-50 health and fitness stations; and
  - 3 studios.
- d. It is agreed that this facility would help meet the future needs of those seeking less physically demanding sports (for example older people). However, the facilities specified are not included in the application description. It is also noted that the Infrastructure and Delivery Plan (section 6.1, p.49) gives a firm commitment to new playing pitches and a club house with changing rooms at the Grove Sports Hub, but not so with regards the local leisure facility in the Neighbourhood Centre, given it states "*Contribution and parameters to deliver a Leisure Centre within the Neighbourhood Centre. and there are no firm commitments to deliver with other references to provision at the school.*" Section 6.7 (Table 6.8) does clarify that the Local Leisure Facility is proposed to be delivered by the applicant, but also proposes a cascade mechanism for its delivery which may, if no willing operator is found, lead to providing a financial contribution towards an existing facility or off-site local development proposal, with the land reverting to general E class uses. Hence there is no guarantee, as stands, that the facility will be delivered.

**11.15 In summary**, clarification is required on the matters highlighted above before a final assessment can be made on the degree of weight to be given to the golf mitigation proposals and on-site overprovision of sports and leisure in respect of NPPF paragraph 104. It is noted that the applicant concludes that limb (c) is entirely met as it provides on-site sports and leisure provision for a greater range and number of people than the facility it replaces. Separate advice may be needed as to whether it is correct to interpret limb (c) in this manner given the development is residential led where much of the provision is to meet the generated demands of the

development. Should it be concluded that the proposal can count as 'alternative sports and recreational provision', it would fall to a weighing of the evidence of timely delivery to determine whether limb (c) is then complied with. However, the Policy Team highlights an overstating of the applicant's evidence which would uphold a judgement of limb (c) compliance. A much more thorough and evidence-based analysis, with supporting data and transparent calculations, and demonstrating a clear delivery path, should be sought before an informed judgement can be made. If the applicant achieves this, legal guarantees of delivery alongside development phases should be included in the legal agreement.

## **12. Healthy Communities inc. open space, leisure & sport – other issues**

**12.1** The proposals provide significant amounts of open space, leisure and sports facilities as shown on the land use parameter plan. These are being assessed against the HDPF Strategic Policy 42: Inclusive Communities and Policy 43: Community Facilities, Leisure and Recreation. Also material are eLP Strategic Policy 27: Inclusive Communities, Health and Wellbeing and Policy 28: Community Facilities and Uses. Weight should also be ascribed to the Council's Open Space, Sport and Recreation Review (June 2021) which supports the eLP.

**12.2** It is anticipated that detailed advice will be provided by the Leisure and Culture Team to consider the provision proposed in the context of the Sports England Sports Facility and Playing Pitch Calculators. This will be important to understand as the overprovision of sports, leisure and recreation facilities has been cited by the applicant as part justification for the loss of Ifield Golf Course.

### **Extent of policy comments**

**12.3** The comments provided by Policy Team are intended to highlight concerns of a strategic nature or in some cases to identify specific technical points as appropriate. They are not intended as exhaustive, such that there are points of detail that remain of concern but are not included as they are not critical to determining the application or to drafting conditions and legal clauses. It is also recognised that other specialist officers or organisations are best placed to comment on matters aligned to their specialisms and Policy Team's comments should not be seen as cutting across those.

#### **ANY RECOMMENDED CONDITIONS:**

See attached **Annex**.

<b>NAME:</b>	Matt Bates
<b>DEPARTMENT:</b>	Planning Policy
<b>DATE:</b>	20 Nov 2025

## Annex

It is recommended that the following additional information is requested:

Parameter plans:

- (i) Revise employment specifications (parcels RV1,2,3) to lower building heights.
- (ii) Remove residential elements from parcel (alternatively, provide further information on mitigation to ensure flexible business operations).
- (iii) Identify a specific Gypsy and Traveller site consistent with the illustrative masterplan.
- (iv) Amend movement parameter plan to show continuation of primary pedestrian/cycle route beyond site boundary.

Design code:

- (v) Amend design code s.3.2.1 to include provision of a Gypsy and Traveller site as outline/hybrid application coding (not delegated to reserved matters).
- (vi) See other suggested amendments to the design code to improve clarity and prospects of delivery.

Economic and Employment Development Strategy (EEDS):

- (vii) Amend to limit E uses to only E(g) with specific exclusion of other E uses. (Apply a condition to reinforce.)
- (viii) Amend to increase indicative B2/B8 uses and reduce offices.
- (ix) Justify potential hotel within parcels R1,2,3 including evidence of demand.
- (x) Amend approach to monitoring to clarify requirements for marketing, innovation and local employment occupiers.

Infrastructure Delivery Plan:

- (xi) Submit proof of agreement reached with WSCC with regards appropriate schools provision (further amends to parameter plans and other documents may be required if WSCC have not agreed to the proposed strategy).
- (xii) Information to demonstrate willingness of Integrated Health Board to provide a surgery/health centre on the site and to set out contingency arrangements should this not be achieved.
- (xiii) Amend to include firm commitment to providing a Local Leisure Centre within the Neighbourhood Centre, and remove references to a cascade mechanism allowing for developer contributions in lieu of on-site delivery.

Transport Assessment

- (i) Submit non-technical addendum to explain local highway impacts (flow increases) and coordinated package of physical measures to mitigate off-site traffic increases.
- (ii) Amend (or supplementary evidence) to clarify arrangements for on-street EV parking provision and clarify on details of short leases of parking to employers.
- (iii) Provide information on draft costings of achieving bus strategy (funding and implementation to be secured in S106).
- (iv) Submit Ifield Station Improvements Feasibility Study if not already done so.

## Ifield Golf Course

- (v) Revise Golf Needs Assessment to address shortcomings highlighted in Policy Team response, to include a clear and enforceable delivery strategy for on-site and off-site mitigation of golf course loss.

It is recommended that the following are attached to any planning permission as conditions and/or secured in the Section 106 legal agreement (these should be reflected as relevant in the draft Heads of Terms):

- a. Require submission of an Innovation Strategy (to provide the framework for the Innovation Centre), with mechanism to ensure timely delivery and monitoring.
- b. Limit development in use class E to E(g) uses only.
- c. Require that the local leisure facility to be provided on-site. (Remove references to a cascade mechanism allowing for developer contributions in lieu of on-site delivery.)
- d. Include requirement for 40% of homes to be affordable of which 70% affordable or social rented and 30% shared ownership or low cost home ownership.
- e. Include an amended indicative housing mix to reflect a 60%/40% split in market/affordable housing.
- f. Requirement for on-site Gypsy and Traveller provision (min 15 pitches) which should be tied to delivery by a specific trigger (e.g. no more than 1,000 homes occupied). There should be no option for off-site delivery.
- g. Comprehensive site-wide energy statement as detailed in the application.
- h. Requirement for local leisure centre and sports hubs to be delivered at appropriate phases with no option for off-site delivery.
- i. Submission of a walking and cycling strategy to include details of off-site delivery of route improvements including to Horsham Town.
- j. Submission of a better developed Travel Plan which includes firm modal targets and contingencies.
- k. Linked to the Transport Assessment and Travel Plan, a monitoring framework for traffic and mode share, and trigger measurement for further off-site improvements should impacts be greater than planned for under 'decide and provide'.
- l. Funding for bus strategy/improvements based on agreed costings and Metrobus confirmed input/agreement.