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Dear Mr Jason Hawkes,

Planning response to Land West of Ifield planning application DC/25/1312 on behalf of Windsor Developments.

We are writing on behalf of our clients Windsor Development & Ardmore Ltd who own and control a number of parcels of land totalling 17.21 hectares, in close proximity to the red lined application “*Land West of Ifield*” currently under consideration by you as case officer on behalf of Horsham District Council (HDC) under the following application:

DC/25/1312 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.

As part of our assessment process of the application, we have had regard to the significant number of documents submitted by Homes England exceeding 300 submissions, but also have been monitoring and reviewing the statutory consultees responses, as well as many residents objections to the application and those of Horsham’s and WSCC own officers.

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Given the complexity of the application and the emerging additional information, we would like to submit this letter as a holding response, and retain the right to submit further updates as the application evolves. We note that many representations and consultees seek additional time extensions and additional submission from Homes England ahead of any formal decision making, and we will be taking the opportunity to review any such further submissions.

Background:

To assist in context setting, our client has owned land to the East of the application site within the family for many years, and has been promoting an employment led strategic employment allocation through the formal Crawley Borough Council (CBC) Local Plan process.

To assist, we have attached our masterplan as an enclosure, for our 17.21 ha site, which was submitted formally to the CBC and their Inspector, as part of the Local Plan Examination process. Throughout this process, discussions were undertaken with Crawley Borough Council and Gatwick Airport Limited, (GAL). In addition, we have also been engaging with Homes England in regard to their proposals at Land West of Ifield to ensure that there is complementarity to both potential allocations, or any subsequent applications through the Development Management process. Both parties have also engaged in meetings to discuss the Crawley Western Multi Modal Transport Link as per Strategic Policy ST4 of the Crawley Local Plan adopted October 2024.

Our masterplan identifies that our proposals known as "Jersey Farm" can provide 540,372.1m² / 434,563.06ft² sqm of commercial floorspace across Class E, B2 and B8. Whilst the application site is within the current safeguarding for an additional Southern runway, our clients are actively engaged in making further representations to GAL, National Aviation Policy and the Northern Runway DCO to request safeguarding is removed.

In addition, Windsor Development/Ardmore Ltd have made formal representations to local and national policy, and undertaken further transport modelling and submissions in relation to the Crawley Western Multi Modal Transport Link that further safeguards land for a Transport Link between Horsham and Crawley, dissecting both Land West of Ifield and Jersey Farm.

Whilst we do not object in principle to the application, we seek to ensure that the application before HDC, does not prejudice the potential development of Jersey Farm, and that any employment land identified in the Hybrid application, and spatial land use plan submitted by Homes England, aligns with opportunities for growth both at Jersey Farm, but also Manor Royal, as a main employment area.

In addition to these matters of principle, at this time we would like to note the following observations on the current application documents and representations.

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1.EMPLOYMENT AND ECONOMIC DEVELOPMENT STRATEGY (EEDS) : WOI-HPA-DOC-EDS-01 submitted by Homes England dated July 2025 Planning portal dated 13/08/2025

In para 1.4 of the EEDS submitted by Homes England they confirm that the hybrid application submitted covers the development of 3,000 homes at West of Ifield, linked to the construction of some 26,400 sqm of business floorspace and 21,200 sqm employment generating accommodation within the proposed Neighbourhood Centre.

As with our clients proposals the EEDS states that the “*the economic and employment roles of West of Ifield will be fully part of long term regeneration and growth ambitions for both Crawley and Horsham, helping to achieve wider ambitions whilst also complementing other priorities (linked for example to regeneration plans for Manor Royal and Crawley town centre) in a manner that is additional by design*”.

Para 3.2 of the EEDS also confirms that Manor Royal is identified in the CBC Adopted Local “*as a dedicated business hub at Manor Royal, and in March 2025, Crawley Borough Council took possession of an Innovation Centre at Manor Royal. Beyond that, the Local Plan allows for employment-related development of different forms.*” Its also highlights that in the adopted CBC Local Plan, Policy EC3 states specifically “*development that is compatible with the area’s economic function and role in the wider subregion will be permitted where it falls within the business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse intensification, or change of use of the land or buildings*”.

P24 of SQWs EEDS(p24) also states that “*West of Ifield needs to establish a strong link to Manor Royal, from a physical / mobility perspective, and a synergistic one in employment and economic terms. For example, could micro businesses generated within West of Ifield be accommodated on Manor Royal as they grow? Or perhaps West of Ifield might focus on complementary sectoral specialisms? The two sites need to be considered together in complementary/synergistic rather than competing terms*”. We agree that any additional employment generating development allocation or applications needs to be linked physically and with a synergy with both towns as a hub for economic growth.

p27 of the SQW document also states that “*ultimately rapid ‘green’ routes connecting Manor Royal with the West of Ifield community as a whole, will establish a comprehensive / innovative, living and working environment.* “. It is essential that any link between Horsham and Crawley consider development and spatial extensions to Manor Royal allowing sustainability led living and working in close proximity geographically.

SQW’s report offers 2 options for the employment floorspace. Option 2 identifies a more B2/B8 led development which replicates more of the employment generating floorspace identified in Jersey Farm Masterplan, Option 2 illustrates a total breakdown of floorspace to be 26,400 sqm GEA or 20,300 NIA based on the submitted Homes England Masterplan. The report also conforms the intention at this outline stage for a 4900sq ft innovation centre. Again, consideration of how this development at Land West of Ifield ensure complementarity with Manor Royal, its emerging Gatwick Green , and future employment provision aligned with the CWMMLT is essential in any development management considerations by HDC in determining this current hybrid application.

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2. Horsham District Council Policy response (dated 20th November from Matt Bates)

HDCs own Policy team have submitted an extensive policy response, which importantly confirms the assessment context for the application given the Local Plan Review and dated 2015 adopted Local Plan. It confirms “*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.”

Critically it confirms HDC's position in para 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. 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*”.

In September 2025, the Council also endorsed the Shaping Development in Horsham District Planning Advice Note (SDPAN) as a material consideration, in respect of weight applied to the policies in both the adopted and emerging plans. The SDPAN states “*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, 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. ”*

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The Policy Officer document also recognises that as Homes England are the national agency for strategic housing delivery and “ but the allocation “*must take 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.*” We agree that infrastructure delivery for both LPAs as a result of the development is essential including the construction and alignment of any road infrastructure connecting Horsham with the London Road to the South of Manor Royal.

The Policy representation seeks further clarity on the EEDS and the 2 options proposed as we all further information on delivery and monitoring as we will monitor this carefully ahead of any draft recommendation by HDC.

Para 10.27 of the policy submission confirms in regard to walking and cycling that “*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.*” Again, given the key relationship with our client’s site to the East, we will continue to monitor all highways matters as further information and representations are submitted.

3. GAL Representation dated 20th November

Given the location of our clients site and that it is currently within safeguarding, we also have had regard to GALs own representation which also requires any HCA proposals to be considered against policies that safeguard land at the airport for future development to enable growth as set out in the Gatwick Airport Masterplan 2019 (including land to be safeguarded for an additional runway to the south of the airport). “*This is to ensure that the proposals for development will not be incompatible with GAL’s proposals to grow the airport. Whilst the proposals do not physically infringe on land safeguarded for airport growth, it could be incompatible in other ways, for example, when taking into account noise and other environmental considerations, or safeguarding matters associated with the airport’s operation.*”

The representation seeks further engagement and clarification from HDC and Homes England on this matter, but raises concerns over noise., “*The proposed development is contrary to national and local planning policy and guidance on aircraft noise and would be better located elsewhere where future aircraft noise levels associated with future growth at the airport are lower. GAL strongly objects to the proposed development on this basis.*”

GAL also query whether adequate information is available in regard to transport including Crawley Western Multi-Modal Corridor (CWMMC). “*GAL is therefore not in a position to provide meaningful comment on the highways issues given the current level of information and does not consider any decision could be taken without significant further information becoming available.*”

It does however align with our site in regard to the provision of any future Crawley Western Multi-Modal Corridor (CWMMC) and it is critical that this is discussed with our clients as land owners to the East and potential delivery. In their representation GAL state:

"It is noted that the section of the Crawley Western Multi-Modal Corridor (CWMMC) is a small part of a longer corridor of improvement supported by the Crawley Local Plan, specifically a connection east to the A23.Crawley Borough Council has safeguarded land for the eastern extension but it is accepted that this is not required to support the West of Ifield hybrid application.Paragraph 4.2.3 of the Transport Assessment states 'The first phase of a Crawley Western Multi - Modal Corridor (CWMMC) from Charlwood Road will support the Proposed Development but will be designed appropriately to provide a future relief function as part of a full CWMMC, if it is extended to the A23 and A2 64 in the future.' However, the Transport Assessment and associated documents do not make clear how the eastern extension, as proposed in the Crawley Local Plan, will tie into the proposed design for the proposed development and if the design is compatible with, or affects, any of the proposed alignments. GAL would like the Applicant to provide further information on how the proposed junction at Charlwood Road/Ifield Avenue complements the proposals in the Crawley Local Plan for further development of the CWMMC and any future impacts on the junction arrangement and operation over the forecasting period for the development."

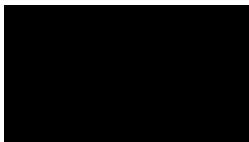
Summary :

The principle of a development at West of Ifield and the potential to co-locate a Homes England development, resulting in a sustainable community at Land West of Ifield through a design, environmental and residential led proposal is supported by our client, however further clarity regarding issues such as connectivity, and employment and transport infrastructure provision is required.

Our clients welcome the opportunity to discuss our proposals located within Crawley Borough Council further with Horsham District Council should this assist any decision making and evidence base assessment.

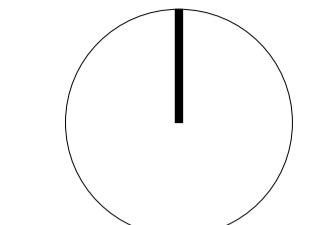
Should you wish us to do so please do not hesitate to contact me.

Yours sincerely



Suzanne Holloway BA (Hons) BTP MRTPI
Partner and LLP Member
For and on behalf of Vail Williams LLP

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