

Mid Sussex District Plan Examination: Inspector's Matters and Issues

Crawley Borough Council Hearing Statement

February 2026

Matter 7: Site Allocations

Policy DPSC2 Crabbet Park.

- 1.1 Crawley Borough Council (CBC) submitted formal representations to the submission draft Mid Sussex District Plan (MSDP) Regulation 19 consultation on 23 February 2024. The comments made at that point remain standing. This Hearing Statement seeks only to provide factual updates on progress since then.

National Planning Policy

- 1.2 National Planning Policy Framework 2024 (NPPF) paragraph 27c is of relevance: *“Once the matters which require collaboration have been identified, strategic policy-making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that: ...*

c) any allocation or designation which cuts across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities”.

- 1.3 The draft consultation NPPF, whilst not published in its final form, provides an indication of the direction of travel for the current government. Draft Policy PM10(2) confirms that *“Plan-making authorities should ensure their plan policies align as fully as possible with those of other bodies where there are strategic interdependencies across boundaries, including neighbouring and other relevant nearby plan-making authorities. In doing so they should take into account the relevant infrastructure and investment plans of infrastructure providers and authorities”.*

Crawley Borough Local Plan

- 1.4 The [Crawley Borough Local Plan 2023 to 2040](#) (the ‘CBLP’) was adopted by Full Council on 16 October 2024. It is acknowledged that the CBLP is not the Local Plan for the administrative area in which the Crabbet Park allocation lies. However, the impacts from a strategic development in this location, immediately adjacent to the borough boundaries, will impact on Crawley’s character as a compact New Town in a countryside setting, important designations and infrastructure capacity within the borough. Therefore, there are some CBLP policies which are directly relevant to the proposal. These include:

- Strategic Policy SD1: Presumption in Favour of Sustainable Development
- Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing
- Strategic Policy CL1: Neighbourhood Principle
- Policy CL7: Important and Valued Landscape and Views
- Policy OS1: Open Space, Sport and Recreation
- Policy OS2: Provision of Open Space and Recreational Facilities
- Policy OS3: Rights of Way and Access to the Countryside
- Strategic Policy IN1: Infrastructure Provision
- Policy EC12: Neighbourhood Centres
- Policy TC5: Town Centre First
- Strategic Policy H1: Housing Provision

- Strategic Policy H4: Future Housing Mix
- Strategic Policy H5: Affordable Housing
- Policy EP5: Air Quality
- Policy ST3: Improving Rail Stations

1.5 The adopted and up-to-date CBLP anticipated strategic urban extensions may come forward outside its boundaries and sets out an indication of what CBC would expect from developments close to its boundary.

CBLP Urban Extensions ‘At Crawley’

1.6 The CBLP (paragraph 12.18) confirms that:

“Well planned urban extensions which provide comprehensive, sustainable new neighbourhoods with local facilities and services, relate well to their rural landscape character and protect the setting of Crawley’s neighbourhoods could form an important way to meet Crawley’s housing needs. Therefore, the Local Plan acknowledges that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough. This work will need to test whether this approach is agreed as a sustainable location in the context of the wider Housing Market Area and travel to work area, and whether the existing infrastructure and environmental constraints can be resolved”.

1.7 CBLP paragraph 12.19 states that:

“In these cases, developments should be laid out and designed to be reflective of their location as part of Crawley and should not result in harm to the setting of the master planned New Town nor result in urban sprawl nor unplanned merging of settlements. They should protect the setting of Crawley’s existing neighbourhoods at the edge of the countryside. New development, by its very nature, will always have a significant impact on the sense of place, space and open setting of an area, both perceived and tangible. Careful analysis is therefore required to assess whether certain elements of landscape structure, form, or character are a major component of or contributor to an established, recognised and enjoyed rural landscape setting. Not all areas have the same capacity to accommodate change without harm to the landscape setting. For example, where wide tracts of non-enclosed open fields or grassland exist, there is very limited capacity for change to the rural setting without impacting on the character of the area, and the setting of the areas adjacent to it. The proportion, scale and extent of these areas provides a sense of space and far reaching and expansive vistas. They provide a perceived and real sense of tranquillity due to the extensive absence of buildings and human presence and are important close to Crawley where such areas are very limited. In contrast, areas where the setting is characterised by woodlands or enclosed country lanes or hedgerow corridors provide contained views and a sense of enclosure”.

1.8 Paragraph 12.20 highlights that:

“In considering urban extensions, the shared evidence base including the Strategic Housing Market Assessment and Economic Growth Assessment should be referred to. Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley’s specific needs for affordable housing, housing mix, type, and tenure. The scale of urban extensions could also provide the opportunity to meet unmet employment needs, or infrastructure requirements such as education and health, and could provide strategic leisure facilities serving the wider area.”

1.9 Critically, the CBLP (paragraph 12.21) confirms that:

“All infrastructure impacts should be considered cumulatively. Urban extensions should meet their own infrastructure needs on site to serve their new residents. It is inevitable

that these residents will also access larger scale existing facilities in Crawley, including the town centre, leisure facilities and transport networks. These will also be affected by development within Crawley and it is important that cumulative impacts are assessed and developments fund improvements to ensure there is no adverse impact on Crawley's residents."

1.10 Paragraph 12.22 highlights that:

"Whilst these developments will be outside Crawley's boundary, the following criteria set out below will be used to inform discussions with neighbouring authorities, including through establishing Statements of Common Ground, and potential developers, and the council's responses to emerging policies and planning applications. Development should only come forward through a Plan-Led process, supported by clear cross-boundary and site-specific Local Plan policies. Where appropriate, Joint Area Action Plans would provide the most robust way to ensure Crawley's needs and concerns are fully addressed. Proposals should be supported by a comprehensive Masterplan agreed by the relevant authorities (including the county council)".

CBLP 'At Crawley' Urban Extensions Key Considerations

1.11 The considerations set out in paragraph 12.23 of the CBLP, endorsed by the CBLP Planning Inspectors' report, are:

"Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that:

- i. Cumulative infrastructure needs are clearly identified and programmed for delivery in coordination with new development, and the proposal would not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of traffic and transport, flooding and drainage, air quality, town centre and community and social facilities;*
- ii. If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Multi-Modal Transport Link (connecting from the A264 to the A23, north of County Oak, Policy ST4) should be agreed and provided prior to the completion of properties unless otherwise agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils;*
- iii. Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport is maintained;*
- iv. The design of the urban form and infrastructure is of high quality design which is not unnecessarily prominent in the existing landscape setting;*
- v. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development;*
- vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents;*
- vii. The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register); complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements;*
- viii. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links (public transport, cycling and walking routes) into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option;*

- ix. *A landscape character, setting and heritage appraisal has been undertaken which:

 - a. *identifies the scale, extent and spatial characteristics of the existing landscape structure and grain, including natural and man-made features, field patterns, views, landscape structure, tranquillity and sense of space or enclosure, and provides an understanding of how they are experienced, used and perceived; and this*
 - b. *has led to an assessment of the impact of the development on the landscape character, setting and heritage of the area, and the setting of Crawley’s neighbourhoods and development is planned to ensure the key landscape features, character areas, areas of tranquillity and settings are protected, and the way they can be experienced is enhanced.**
- x. *Development has been designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate;*
- xi. *Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer, in accordance with national guidance, is provided between any such trees and the edge of the development’s construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented. Where the loss of existing trees is unavoidable, appropriate replacement trees are to be provided;*
- xii. *Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity;*
- xiii. *Development must be designed to exemplar sustainability standards, taking advantage of the potential of a masterplanned approach and economies of scale, and must design in tight energy and water efficiency targets from the outset in order to futureproof developments for a zero carbon future and a changing climate;*
- xiv. *Development proposals use bespoke Area Wide Design Assessment tools from the outset which will aim to set out and enable development proposals to identify, understand and fit in with the overall form and layout of their surroundings.*

CBLP Inspectors’ Final Report

- 1.12 The approach taken in the CBLP was accepted and endorsed by the Inspectors for the independent examination into the CBLP, in their [Crawley Borough Local Plan Inspectors' final report September 2024](#), paragraphs 58 to 59:

58. At a strategic level, we consider it is justified that the Plan is predicated on a strategy of optimising development in Crawley and then seeking to see development needs accommodated as close to Crawley as possible. We accept, as part of the latter, the Council would be reliant on neighbouring planning authorities. This, however, is not unreasonable given previous plan making and the indications that both Horsham and Mid Sussex are contemplating strategic urban extensions to Crawley as part of their current plan-making. Accordingly, we consider the Plan is justified in setting out the position of Crawley Borough Council, as a local planning authority, with regards to development ‘At Crawley’. Prudently, the Council recognises that it cannot set policy in its Plan to materially affect what would be a decision for another local planning authority. However, given any strategic growth on the edge of Crawley would give rise to impacts on Crawley it is justified that the submitted Plan sets out content on “Urban Extensions at Crawley” including Crawley-centric considerations.

59. These considerations are set out at paragraph 12.23 of the submitted Plan. As submitted the Plan articulates what would be required for Crawley to support adjacent

growth proposals, that is not the same as setting policy requirements. Nonetheless, they comprise reasonable expectations for sustainable development given the immediate impact of wider growth 'At Crawley', particularly on matters such as character and infrastructure, would be keenly experienced by communities in Crawley. On this issue, we find the Plan's approach to likely peripheral growth in neighbouring authorities to be sound.

* underline CBC emphasis.

- 1.13 Critically in relation to affordable housing, the CBLP Inspectors' final report stated: "we consider the evidence of an acute unmet affordable housing need supports the case that any strategic housing growth at the edge of Crawley should seek to positively respond to this issue if growth 'At Crawley' is to be genuinely sustainable for the town and its immediate hinterland" (paragraph 185).

Ongoing Liaison

- 1.14 CBC has recently met with MSDC and the Crabbet Park site promoter. Updates on progress with the development proposals were provided by Wates, and matters arising from CBC's representation were discussed.

Conclusion

- 1.15 CBC welcomes engagement with the Crabbet Park site promoter, given the significant of impacts on Crawley.
- 1.16 The CBC position set out in its Regulation 19 representation to the MSDP is based on its adopted Local Plan paragraphs on Urban Extensions and its endorsement by the CBLP Planning Inspectors' report as set out in sections 1.6 to 1.13 above. Therefore, CBC strongly maintains its position on the matters in relation to Policy DPSC2 and the Crabbet Park Significant Site allocation, particularly in relation to:
- Potential impacts on infrastructure and services within Crawley borough; and
 - Contribution towards meeting housing need (including housing mix and affordable housing quantum).