



Homes  
England

# Crawley Local Plan 2024 -2040 Examination in Public

Matter 10: Transport and Infrastructure

Hearing Statement

Date: December 2023



# Issue 2: Whether the plan’s approach to the Crawley Western Multi-Modal Transport Link at Policy ST4 is sound?

## 1. Introduction

1.1 This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site in the emerging Horsham Local Plan review.

1.2 This statement supplements Homes England’s previous representations to the Crawley Borough Council Local Plan Regulation 19 consultation (dated 16 June 2023) and other relevant other Matter statements. Where relevant, separate submissions will be made in relation to Homes England’s other land interests.

## 2. **Is the principle of an area of search justified? Is it necessary for plan soundness, having regard to the evidence base (documents at ES/ST/02 – the various SYSTRA reports), that a narrower area of search or preferred option for the route alignment is identified.**

2.1 As per our previous representations, Homes England supports the identification of the search area for the Crawley Western Multi-Modal Transport Link (“Crawley Western Link”) and maintain that the principle of an area of search is justified for the Plan to be sound and particularly positively prepared in the context of ensuring that there is safeguarding of land for infrastructure requirement to meet unmet needs arising from this Plan and future plans that may be delivered outside of the Crawley administrative boundary.

2.2 This is evidenced in the Crawley Western Link Northern Area Search Study, 2023 (ES/ST/02) which supports Policy ST4 and the area of search and identifies that deliverable routes could be found. Furthermore, the Study confirms that route options will be achievable within this area of search, thereby justifying its inclusion within the Local Plan.

2.3 As such, it is Homes England’s view that by having an area of search rather than identifying a specific route alignment, this allows flexibility such that any final route would be determined through further detailed studies at the appropriate time thereby best supporting potential growth to meet unmet needs in the future.

**3. Is the area of search justified having regard to Gatwick Airport’s masterplan, land ownerships, environmental designations and features and residential amenity? Is the interim approach to the eastern end of the route a pragmatic solution that would enable a future potential southern runway or an ineffective, costly and unjustified complexity that would present a significant level of risk to delivering a western link?**

3.1 Homes England support the area of search for the Crawley Western Link as set out in Policy ST4 and believe it to be justified. In addition, as per our previous representations Homes England recognise the importance of the safeguarding area proposed for the potential southern runway of Gatwick Airport.

3.2 In respect of the interim approach to the eastern end of the route, as set out in our previous representations, Homes England maintains its support for the flexible approach at the eastern (A23) end of the proposed link. Homes England is of the opinion that flexibility is necessary and seeks to balance the conflict between safeguarding for the Gatwick Runway against the potential loss of employment land and ability to deliver the Crawley Western Link as a whole, bringing forward a priority strategic transport link in the timescales set out in the West Sussex Local Transport Plan and to ensure that potential suitable routes are not prejudiced should further clarity on national aviation policy confirm the status of Gatwick safeguarding in the future.

3.3 As stated previously, the supporting feasibility study presents a sound approach detailing alternative options that could be deployed in the event a southern runway does / does not come forward which is considered necessary given the wider land use impacts that would need to be considered as part of any runway proposal at that time.

**4. Would a route within the area of search be deliverable in principle and would Policy ST4 be effective in securing its delivery?**

4.1 Homes England welcome the ambition to support the delivery of the Crawley Western Link at the earliest opportunity and is pro-actively working with the relevant local authorities to bring forward the first phase of the multi-modal link as part of our West of Ifield proposals.

4.2 As per our previous representations, whilst Policy ST4 provides sufficient safeguarding to enable the delivery of the Crawley Western Link, for Policy ST4 to be effective in securing its delivery and become sound, we have set out more detail that would be required in the policy to enable delivery of the scheme. Homes England’s view

therefore remains unchanged that unless modified Policy ST4 is not effective in as much as:

- i) There is no detail on how proposals coming forward in the safeguarding corridor would be dealt with and be required to take account of the Crawley Western Link.
- ii) More detail and further clarity is needed on how development coming forward within the wider Crawley area will contribute to the scheme delivery and how the necessary funding will be secured through the proposed infrastructure delivery requirements set out in Policy IN1.
- iii) As a strategically important scheme that is identified as being 'developer led' in the West Sussex Transport Plan 2022 -2026, reference to potential land assembly mechanisms, including potential use of CPO or supporting development proposals that help facilitate the Western Multi-Modal Transport Link should be included within the main ST4 policy wording rather than the supporting text.

4.3 To address the points above, we have recommended alternative wording within our Regulation 19 consultation response, considered necessary to make Policy ST4 effective. These include the inclusion of additional text that seeks to secure appropriate financial contributions from development within the wider area, further clarity on how schemes that may prejudice the delivery of the Western Link will be assessed and the inclusion of references to potential land assembly mechanisms, including the use of compulsory purchase powers.

**5. Does the proposed route safeguarding provide an effective approach that strikes an appropriate balance between not precluding strategic options 'At Crawley' coming forward whilst at the same time providing sufficient certainty as to what could occur within this part of the Borough?**

5.1 Notwithstanding our concerns as detailed in our Matter 2 response, regarding paragraph 12.23 and the unjustified requirement on delivery of the full Crawley Western Link ahead of any development to the West of Crawley, the overall approach to the proposed route safeguarding is supported by Homes England.

5.2 As stated in our previous representations, Homes England considers that the scoping of the Western Multi-Modal Transport Link is critical to unlocking further major strategic development to the West of Crawley beyond the Draft Crawley Local Plan period and the Land West of Ifield site. As such, while any future development to the

West of Crawley (either in isolation or in-combination) above that currently tested may trigger the need for an extended multi-modal link at a future point in time, Policy ST4 provides sufficient safeguarding to enable its delivery and is thereby suitably aligned to support strategic options 'At Crawley' coming forward.

5.3 As set out under paragraph 4.2 above, however, additional wording is required within the policy to ensure that it can perform the intended function of safeguarding this land and supporting delivery of the Link when it is required.

**6. Would it be necessary for soundness to extend the area of search for the link further east to Gatwick Road?**

6.1 No response.

**7. Is the wording of Policy ST4 sufficiently robust to ensure any route and its design takes account of environmental assets including, but not limited to, ancient trees/woodland not yet identified in any recognized inventory and proximate protected sites such as Local Green Space, Local Wildlife Sites and Local Nature Reserves?**

7.1 Homes England is of the opinion that the wording of Policy ST4 is sufficiently robust to ensure any route and its design takes account of environmental assets. The flexibility afforded by the Area of Search supports the ability for any future route to take detailed consideration of this at the point of planning and delivery.

**8. Is it necessary for soundness for Policy ST4 to require a multi-modal link west of Crawley to have regard to land safeguarded at Gatwick Airport at part a of the policy?**

8.1 As noted above a flexible approach is necessary which seeks to balance the risk of safeguarding Gatwick Airport against the potential loss of employment land and ability to deliver the Crawley Western Link as a strategic transport link in the timescales set out in the West Sussex Local Transport Plan.

8.2 It is therefore not considered necessary for ST4 to require a multimodal link west of Crawley to have regard to the safeguarded land at Gatwick Airport as the aims of ST4. The purpose of alternative route options within the Gatwick safeguarding area has been designed purposefully to provide the required flexibility and enable the timely delivery of the CWL against a backdrop of current uncertainty around long term airport expansion.

- 8.3 Should the policy require consideration of the safeguarding, it would likely become ineffective as drafted as it would essentially discount the more northerly option from being considered in the near term rather than allowing consideration of the wider land use impacts that would need to be considered as part of any runway proposal at that time.
- 8.4 Having reflected on the above question and specific policy wording of ST4 further, it may be prudent for further wording to be including as part of ST4 to provide further clarity as to how any proposals for the Crawley Western Link would be considered in the context of GAT2 so that due consideration can be given to airport safeguarding policies without preventing the delivery of either of the two CWL alignments in the near term.