

**Sent:**

23 December 2025 12:44

**To:**

Jason.Hawkes

**Subject:**

IN THE LIGHT OF IAN MULCAHY'S FORENSIC ANALYSIS AND OBJECTION, FURTHER REASONS WHY HOMES ENGLAND'S WEST OF IFIELD PLANNING APPLICATION SHOULD BE WITHDRAWN OR REJECTED

**Categories:**

Comments Received

Dear Jason Hawkes

## **REASONS FOR WITHDRAWAL/REFUSAL**

Hybrid Planning Application DC/25/1312 – Land West of Ifield

### **Reason for Withdrawal/Refusal 1 – Unsound Environmental Baseline (Ifield Brook Meadows)**

The application should be withdrawn/refused because it fails to provide a sound, accurate, and reliable environmental baseline in respect of Ifield Brook and Ifield Brook Meadows.

The submitted Design & Access Statement and associated documentation misidentify the primary watercourse, repeatedly conflating Ifield Brook with the adjacent Mill Stream, which have been distinct watercourses since the late 17th century. As a consequence, the application fails to properly assess:

- hydrological function and floodplain interaction;
- surface water drainage and SuDS effectiveness;
- pollution pathways and downstream impacts;
- ecological connectivity and freshwater habitat sensitivity.

In the absence of a correct baseline understanding, the Local Planning Authority cannot be satisfied that the development would not result in unacceptable harm to Ifield Brook Meadows or the wider water environment.

The proposal is therefore contrary to the National Planning Policy Framework, including paragraphs 174, 175, 180 and 181, which require decisions to be based on robust and proportionate evidence and to protect and enhance the natural environment.

### **Reason for Withdrawal/Refusal 2 – Failure to Demonstrate Acceptable Environmental Impact or Mitigation**

The application should be withdrawn/refused because, due to the inaccurate identification and assessment of Ifield Brook, the submitted environmental mitigation and management measures cannot be relied upon to avoid harm to Ifield Brook Meadows, a sensitive freshwater ecosystem forming part of the historic setting of Ifield Parish.

The proposal fails to demonstrate, to the satisfaction of the Local Planning Authority, that:

- increased recreational pressure, access routes, and adjacent development would not result in incremental degradation of the Meadows;
- drainage, runoff, and water quality impacts would be adequately controlled;
- long-term stewardship and management arrangements would secure the ecological integrity of the Meadows in perpetuity.

The proposal is therefore contrary to NPPF paragraphs 174, 175 and 180, which require development to avoid significant harm to ecological assets and to demonstrate effective mitigation and management where impacts cannot be avoided.

### **Reason for Withdrawal/Refusal 3 – Lack of Confidence in Submitted Evidence and Decision-Making Risk**

The application should be withdrawn/refused because the Design & Access Statement exhibits a systemic pattern of factual inaccuracies and misrepresentations relating to local geography, hydrology, landscape character, and heritage assets, including but not limited to the misidentification of Ifield Brook.

Taken cumulatively, these errors demonstrate a lack of sufficient understanding of the site and its context, such that the Local Planning Authority cannot place reasonable reliance on the submitted assessments when determining the likely impacts of the development on Ifield Brook Meadows and its setting.

Granting permission on the basis of unsound and unreliable evidence would result in unsafe decision-making and would be inconsistent with the requirements of the NPPF that planning decisions be based on adequate, accurate and up-to-date information.

#### **Reason for Withdrawal/Refusal 4 – Harm to the Historic Parish Landscape of Ifield**

The application should be withdrawn/refused because the failure to properly identify and assess Ifield Brook and its relationship with Ifield Brook Meadows results in an inadequate assessment of harm to the historic parish landscape of Ifield, of which the Meadows form an integral and functionally linked component.

The proposal fails to demonstrate that development would conserve or enhance the character, setting, and historic integrity of this landscape, contrary to the objectives of the NPPF, including paragraphs 174, 180 and 194, which seek to protect heritage assets and their settings and the landscapes in which they are experienced.

How can the Local Planning Authority be satisfied that the application is supported by a robust or accurate environmental baseline, particularly in relation to Ifield Brook Meadows. The Authority cannot conclude that the proposed development would not result in unacceptable harm to the water environment, ecological assets, and historic parish landscape.

Yours sincerely

[Redacted Signature]

The Ifield Society

2 Lychgate Cottages

Ifield Street, Ifield Village

Crawley, West Sussex

RH11 ONN

[REDACTED]

[REDACTED]

1

•