

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 23 September 2025 16:35:33 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/25/1312
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 23/09/2025 4:35 PM.

Application Summary

Address:	Land West of Ifield Charlwood Road Ifield West Sussex
Proposal:	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. cr
Case Officer:	Jason Hawkes

[Click for further information](#)

Customer Details

Address:	6 Friston walk Ifield Crawley
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Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Other
Comments:	<p>Objection. West of Ifield planning application should be refused on the following grounds .</p> <p>The adverse impacts significantly and demonstrably outweigh the benefits.</p> <p>CMMLR/crawley western relief road There is no definite plan for the FULL CMMLR TO BE BUILT .To build 3,000 Houses going directly onto Crawley Avenue would HARM the health ,wellbeing and quality of life for the residents of Crawley and Rusper OUTWEIGHING THE BENEFITS.</p> <p>1. This application by Homes England is for the first neighbourhood of a planned three neighbourhoods as shown in the (HOMES ENGLAND West of IFIELD members presentation 2019 ,updated 3rd march 2021). It states 2026 (obviously delayed)HORSHAM AND CRAWLEY LOCAL PLAN REVIEWED, DELIVERY SECOND AND THIRD NEIGHBOURHOODS). This H.E. Planning application should be viewed as part of a 10,000, three neighbourhood development.</p> <p>AS SUCH THIS PLANNING APPLICATION SHOULD DEMONSTRATE THE COMPLETE CWRR/CMMLR ROAD IS DELIVERABLE AND THE EXACT ROUTE DEFINED!!.</p> <p>2. A material consideration should be given to the area of search for the northern part of the proposed CMMLR that would join Ifield Avenue to County Oak . There are no references by HDC or CBC that this would definitely be the route that the CMMLR would follow only an AREA OF SEARCH in both local plans .</p> <p>In Homes England 's (Land West of Ifield members presentation2019)North section of road delivered working with Gatwick Airport . Gatwick Airport have stated they are not interested in contributing to this road and do not support any of the 4 scenarios suggested in the SYSTRA Crawley Western Link Road - Northern section study refined area of search.</p> <p>Consequently, it cannot be proven that the middle section of the CMMLR would not impede the delivery of a 50mph WESTERN</p>

RELIEF ROAD that would be needed to alleviate Crawley's highly congested roads. WSCC transport assessment states that a (20/30 mph road CMLR) would only reduce traffic on Rusper rd and a few minor roads in RUSPER as car drivers would not leave a 50MPH to join a 20/30 mph road .

Ifield avenue to county oak is within the 60dB range and no housing development can be built there . WHO IS GOING TO PAY FOR THIS ROAD!!!

Crawley local plan 2024 page 254-257

Alignment for New Multi-Modal Transport Link 17.20 The Transport Modelling undertaken for the Crawley Borough Local Plan Review has identified a number of junctions within the borough which are already at capacity or

require mitigation following new development. This is based on the quantum of development already coming forward in Crawley, and that being delivered through the adopted Mid Sussex District Plan, Horsham District Planning Framework and Reigate and Banstead Core Strategy and Development Management Plan. Further major development is being promoted to the west of Crawley, through the Horsham District Local Plan Review, and Gatwick Airport's Master Plan 2019 anticipates significant growth in passenger numbers at the airport, even just on a single runway. The cumulative impact of these developments will exacerbate existing capacity issues on roads within Crawley. 17.21 Therefore, it is considered necessary to undertake further strategic transport assessment considering the cumulative impacts of development across the area. Due to the potential levels of development, it is considered appropriate that the council identifies an area of search within Crawley for a potential full Western Multi-Modal Transport Link, in partnership with West Sussex County Council. This will need to connect to a route corridor within Horsham district, identified by Horsham District Council, to the west.

Strategic Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link The Local Plan Map identifies an Area of Search for a Crawley Western Multi-Modal Transport Link connecting the A264 with the A23. The design and route of the Western Multi-Modal Transport Link must take account of: a. its impact on (but not limited to): - existing properties which could be affected by the final route; - residential and commercial properties close to the final route; - the flood plain; - the rural landscape; - local biodiversity; - sports pitch provision and recreation facilities; and - heritage and heritage landscape assets and visual intrusion. b. the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion). c. land safeguarded at Gatwick Airport for potential future southern runway expansion. d. protected sites and habitats, through identification of the potential impacts on these. Connectivity by non-vehicular modes of transport between Crawley's urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.

Reasoned Justification 17.22 The Western Multi-Modal Transport Link should provide a new strategic transport link for travel from the west, and from Kilnwood Vale and any new development west of Crawley to link directly with the A23 north of County Oak serving Manor Royal and Gatwick. This will remove the need for this traffic to come further east into Crawley and travel around all the roundabouts accessing Crawley's western neighbourhoods to link with the A23, a route which is known to be increasingly congested at peak times. 17.23 The provision of a full Western Multi-Modal Transport Link between the A264, west of Kilnwood Vale, and the A23 (North of County Oak), associated with significant strategic development to the west of Crawley, outside the borough's administrative boundary, is

necessary to reduce existing congestion on the A2220 and A23, remove through traffic from the neighbourhood junctions and residential roads, reduce inappropriate usage and increased levels of traffic on rural routes to Gatwick Airport, and reduce pressure on the M23 Junctions 10 and 11. It will also help mitigate the surface access impacts of growth at the Airport, provide alternatives to help address the impacts from permitted new developments (Kilnwood Vale, Pease Pottage and North Horsham) and from potential future developments on the western side of Crawley. It is anticipated that detailed impacts of further development onto the Crawley road network would be modelled through the Horsham District Local Plan Review process.

17.24 Without commitment to the construction of a full Western Multi-Modal Transport Link between the A264 and A23 (North), all the traffic from any development to the west of Crawley, from permitted schemes and any future proposals which could emerge through the Horsham District Plan Review and/or through planning applications permissions granted as windfalls, is likely to feed into residential roads in Ifield and/or Langley Green and onto the already congested A23 junctions, particularly the Ifield Avenue/A23 junction in the long term. New highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space would be wholly unacceptable, given the impact this would have on ancient woodland, the biodiversity in the LWS and LNR, the character of Ifield Village Conservation Area, the flood plain and the recreational use of the Local Green Space. 17.25 A Western Multi-Modal Transport Link would enable the prioritisation of connectivity by more direct routes for public transport, cycling and walking into Crawley from any new development to the west, with vehicular traffic having to take a longer route along the Western Link. Existing Public Rights of Way should be designed into the road, with safe,

accessible and convenient road crossing opportunities provided. New opportunities for walking, cycling and horse riding links should be explored. 17.26 Land was previously safeguarded for a

Crawley Western Relief Road as part of the West of Bewbush Joint Area Action Plan (Policy WB23) because, whilst the Transport Assessment for Kilnwood Vale did not demonstrate it was necessary to serve that development alone, it was considered that it might be needed to serve future development west of Crawley, or wider sub regional objectives. 17.27 The proposed Area of Search partially overlaps the area of land safeguarded for a potential future southern runway at Gatwick Airport. The council is engaging with Gatwick Airport and West Sussex County Council about the partial overlap of these two areas, with the aim of minimising the impact on residents living close to the route and reducing the need for land to be compulsorily purchased. 17.28 An initial scoping study has been undertaken on behalf of the council to refine the Area of Search within Crawley and to consider its extent into land safeguarded for a potential future southern runway at Gatwick Airport. This study was undertaken for the purpose of facilitating the refinement of the Area of Search shown on the Local Plan Map to support further work to be carried out in the future by the appropriate body responsible for delivery of the route. Such further work would include identifying and assessing specific route alignments and then progressing the development of a multi-modal transport link should significant strategic development to the west of Crawley's administrative boundaries come forward. The route options identified throughout the study are indicative only for the purposes of assessing a reasonable range of possible options, and do not suggest a preferred or final route option in any case. 17.29 The work carried out as part of the study significantly reduced the overlap into safeguarding for much of the Area of Search length, encroaching only where there is scope for the route to be compatible with the safe operation of an additional widespaced southern runway. The study indicates potential examples where the route could fall outside of the safeguarded land completely, should this be necessary. 17.30 This is with the exception of the eastern end, where an alternative Area of Search is suggested for the interim period unless and until such a time when a southern runway is pursued by Gatwick Airport. The provisions of a route for the Crawley Western MultiModal Transport Link in this interim Area of Search would offer opportunities to maintain the full capacity of the transport corridor without impact on any existing commercial properties within County Oak. However, the benefits of this interim option would need to be considered carefully, at the point of route feasibility assessment, against the costs of re-providing the route should a southern runway at Gatwick Airport be progressed. Discussion and agreement with Gatwick Airport Limited will form an essential part of this further work. 17.31 The Area of Search is located mainly outside the Built-Up Area Boundary, within the Upper Mole Farmlands Rural Fringe, and includes areas of known environmental constraints including, but not limited to, the River Mole floodplain, ancient woodlands, biodiversity opportunity areas, local open spaces, local natural reserves, local wildlife sites and structural landscaping. The

requirements and expectations of the other policies in this Local Plan and in national policy relevant to these constraints will apply in the circumstances of route identification and design for the Crawley Western MultiModal Transport Link. 17.32 There may be a need for land to be compulsory purchased in order to deliver the scheme once a route has been defined

Homes England's plan

BUILD 35% affordable housing for the people of the area 80% of the going rate .

No social housing for the people of the area 50 % of the going rate .

This equates to 48 affordable houses a year .

Approximately 2,500 people are on Crawley's and Horsham's housing waiting list who can't afford the 65% open market housing .

This development would encourage people from London to an area which already has a severe water problem .

The harm outweighs the benefit.

Building the bare minimum sports facilities for the future residents of the development

Crawley sporting need is for a swimming pool none to be built , therefore putting extra demand on to Crawley's existing pools .(Nutfield health Crawley central fitness and well-being club)at Crawley leisure park has closed resulting in the loss of two swimming pools .

The harm outweighs the benefit

Surrounding Ifield Brook Meadows

(designated green space)The proposed development would completely enclose the meadow thereby turning a beautiful well loved area into a thoroughfare with hundreds of people crossing it to access shops , Doctors surgery ,dentist and Crawley town which would cause the destruction of habitats and the only place of Tranquility for the people on this side of Crawley .

The harm outweighs the benefit

A secondary school is being built.

Despite homes England repeated statement that this school is being built because of the lack of school places in Crawley .TO JUSTIFY THIS SCHOOL BEING BUILT AT LEAST 9,000 homes would have to be built .

Crawley needs a school in the north where 1,000 homes are already occupied.(Forge Wood)

Forge wood is over 3 miles from west of Ifield and children from Forge Wood would travel free by bus at a cost to the taxpayer.

Also detrimental to the health and well-being of children travelling across a very congested town twice a day 53 minutes a trip (metro bus time table).

(WSCC Planning school places 2025) Crawley short fall of 200 school places by 2029.

100 of these children require a catholic education .ST Wilfred's catholic school has had a planning application to build 14 classrooms approved .

Hazelwick school which is near Forge wood has room to expand.

To build a school which might have to be delayed or mothballed (as in Homes England's northern arc development) WOULD BE Irresponsible to say the least.

The harm outweighs the benefit .

BUILDING AT WEST OF IFIELD

GATWICK AIRPORT

West of Ifield is 1km from the end of the main runway .

The Northern Runway has been approved .

Larger aircraft will only be allowed to use existing runway which is nearer to the WOI proposed development also the new updated taxiways bring aircraft nearer to the WOI creating more noise. The position of the Biomass boiler flue height up to 50m above ground which might also be a concern RELEASING PM2.5 .

Government guide lines .

Health and well-being should be at the heart of all development .

To avoid and where possible reduce the number of people being significantly affected by aircraft noise.

The SA never considered the nearness of the WOI SITE to Gatwick AGAINST ANY OTHER SITE, The amount of noise should have been considered at preplanning stage not wait for a planning application. Designation should have been highlighted as (Significant negative effect.)

Government directive (there is no overall noise standards and councils should make decisions on noise).

Not building on land less then 60dB Without considering the frequency of aircraft noise goes against PLANNING PRACTICE GUIDANCE 2nd paragraph.

What are the observed effect levels?

Significant observed adverse effect level [SOAEL]: This is the level of noise exposure above which significant adverse effects on health and quality of life occur.

Lowest observed adverse effect level [LOAEL]: This is the level of noise exposure above which adverse effects on health and quality of life can be detected.

No observed effect level: This is the level of noise exposure below which no effect at all health or quality of life can be detected.

Although the word 'level' is used here, this does not mean that the effects can only be defined in terms of a single value of noise exposure. In some circumstances adverse effects are defined in terms of a combination of more than one factor such as noise exposure, the number of occurrences of the noise in a given time period, the duration of the noise and the time of day the noise occurs".

The prospect of 389,000 flights a year taking off and landing 1km to 2km away from the west of Ifield proposed housing development must be a material consideration.

To not do so would be negligent.

PM2.5 Targets: Interim Planning Guidance - DEFRA UK Air - GOV.UK

This interim guidance applies to future developments and those that were in pre-application at the publication date of this guidance. The guidance is not required to be applied retrospectively for planning decisions where applications were submitted prior to the publication of the interim guidance.

The requirements set out in the guidance should be applied in the design process and documented within the planning application documents. For example, evidence of its application could be set out within the air quality assessment in the environmental statement where the development is EIA development or as part of a standalone air quality assessment where EIA is not required.

The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set two new targets for fine particulate matter (PM2.5):

4 October 2024

A maximum annual mean concentration target of 10 $\mu\text{g}/\text{m}^3$ to be achieved by 2040 (the AMCT); and

A population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT).

Defra is developing guidance for applicants and Planning Authorities in England to demonstrate that they have appropriately considered the PM2.5 targets when making planning applications and planning decisions.

The purpose of the targets is to improve air quality by reducing levels of PM2.5 across the country, therefore improving public health. While achievement of the targets will be assessed at relevant monitoring sites, the targets apply to ambient (outdoor) air throughout England. Applicants and Local Planning Authorities should therefore consider the impact of developments on air quality in all ambient air, whether a monitor is present or not.

These targets require a different approach to that used by applicants and Local Authorities in response to existing air quality legislation.

The new approach moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage, streamlining the process for planning and ensuring the minimum amount of pollution is emitted and that exposure is minimised.

Pending publication of the new guidance, applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable. If quantitative

evidence is not available, a qualitative approach can be taken. This applies to all developments which would normally require an air quality assessment. More detailed assessments are expected for developments which are closer to populations, and those which are likely to have higher emissions. This guidance is separate to how PM2.5 should be considered within environmental permitting.

The following questions are designed to be used as prompts to support the interim process, but applicants are welcome to consider measures in addition to those listed below:

1. How has exposure to PM2.5 been considered when selecting the development site?

Applicants are advised to consider the following in their application:

Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these, Site proximity to pollution sources and the impact of these on users of the development, Exposure and emissions during both construction and in-use.

The majority of the time the air quality around Gatwick and Crawley is classed as fair with people with health problems advised to not spend a lot of time outdoors.(AccuWeather)however their are times when the level exceeds the permitted limit .

There are many documents from government and health service professionals that specifically state that living near an airport is decremental to health .

PM 2.5Fine Particulate Matter are inhalable pollutant particles with a diameter less than 2.5 micrometers that can enter the lungs and bloodstream, resulting in serious health issues. The most severe impacts are on the lungs and heart. Exposure can result in coughing or difficulty breathing, aggravated asthma, and the development of chronic respiratory disease.

THE HARM OUTWEIGHS THE BENEFITS

Conclusion

The Cumulative effects of all these points clearly demonstrates that

The adverse impacts significantly and demonstrably outweigh the benefits.

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**

Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane E aton