

[REDACTED]
Fairway
Rusper Road
Ifield, West Sussex
RH11 0LN

24 September 2025

To: Planning Office, Horsham District Council

Re: Application DC/25/1312 – Land West of Ifield Charlwood Road Ifield West Sussex

Dear Sir/Madam,

We write to object in the strongest possible terms to the above hybrid planning application (DC/25/1312) submitted by Homes England for up to 3,000 homes and associated infrastructure at Land West of Ifield.

This application is premature, environmentally unsound, and harmful to the historic and rural setting of Ifield. The applicant's own Environmental Statement acknowledges significant adverse impacts that cannot be mitigated.

Our grounds for objection are set out below.

1. Prematurity and Policy Conflict

- Horsham's Local Plan was withdrawn and is being rewritten; West of Ifield's allocation is **not adopted**. Approving DC/25/1312 now would pre-empt democratic plan-making and prejudice the Local Plan Examination.
- The scheme anticipates a wider "new town" west of Crawley. This is strategic in scale and should only be considered through the Local Plan.
- Homes England have admitted that the 3,000 dwellings are only **Phase 1 of a potential 10,000-home masterplan**. The cumulative environmental and infrastructure impacts of the full 10,000 must be assessed now, not deferred, under the EIA Regulations and NPPF.

2. Heritage Harm (Statutory Objection)

- The Environmental Statement (Chapter 10) concedes a **moderate adverse (significant) effect** on the **Scheduled Monument at Ifield Court**, with the new Crawley Western Multi-Modal Corridor passing within 15m, eroding its rural isolation and tranquillity.

- The **Grade I listed St Margaret's Church** would suffer harm to its historic rural setting and long-distance views.
- The **Ifield Village Conservation Area** would experience **less than substantial harm at the high end** due to loss of rural context and urban encroachment.

Under NPPF para. 212, great weight must be given to heritage conservation, and harm to Scheduled Monuments is only permissible in “wholly exceptional” cases. This test is not met.

3. Landscape and Visual Impact

- ES and Design Codes admit **significant adverse visual impacts** for residents along Rusper Road and others.
 - Urbanising elements such as **marker buildings, engineered SuDS basins, and hard urban edges** are wholly at odds with the rural character of Ifield.
 - Public rights of way and views across Ifield Brook Meadows will be irreversibly changed.
-

4. Biodiversity and Trees

- The Biodiversity Net Gain (BNG) report shows **net losses for hedgerows (-3.42%) and rivers (-0.46%)**, only rectified if speculative new habitats establish.
 - **Veteran tree T368** will be removed for the new road. Veteran tree loss is irreplaceable and only acceptable in “wholly exceptional” circumstances (NPPF para. 193).
 - The Phase 1 Ecology Strategy records an **exceptional slow worm population** and 719 invertebrate species, including nationally endangered ones.
 - Recreational pressure and narrow buffer zones (25–35m) threaten ancient woodland integrity.
 - Sussex Wildlife Trust has raised concern that Ifield Brook Meadows LWS will be **surrounded by development**, undermining its ecological function.
-

5. Flood Risk and Drainage

- FRA confirms parts of the site lie in **Flood Zones 2 & 3**, with historic flooding (1947, 1968, 2014).
- The scheme relies on **engineered flood compensation areas**, which still result in **increased flood depths (up to 10cm)**.

- Drainage relies on **attenuation tanks and swales** because infiltration is impossible (Weald Clay). Gatwick bird-strike risk prevents natural wetlands. These highly engineered systems create long-term resilience and safety risks.
-

6. Water Neutrality and Sewage Capacity

- Daily demand: ~710,000 litres. Strategy depends on closure of Ifield Golf Course, purchase of **SNOWS credits**, and **private boreholes** into Tunbridge Wells Sand aquifer. SNOWS credits are uncertain and borehole abstraction risks ecological damage.
- Crawley Wastewater Treatment Works are already near capacity. Thames Water and Crawley BC have raised concerns, yet the application provides contradictory statements about consultation and mitigation. There is a real risk of sewage overflows into the River Mole.

This strategy is not robust or deliverable and fails both Natural England's water neutrality requirements and NPPF para. 183 on pollution control.

7. Transport and Highways

- Reliance on the **Crawley Western Multi-Modal Corridor (CWMMC)** is unproven; even with mitigation, journey times increase (4–5 mins longer for residents).
 - Rusper Road closure/severance will displace traffic onto already unsafe junctions (Ifield Roundabout, Crawley Avenue).
 - Accident data already shows clusters of serious/fatal incidents.
 - Construction traffic is routed via Overdene Drive, Tangmere Road, Rusper Road, and Ifield Station, creating acute risks around schools and pedestrian routes.
 - Closure of Rusper Road risks creating a 600m cul-de-sac (Maples → Furlong Farm), potentially impassable to emergency vehicles. This conflicts with NPPF para. 110 (safe and suitable access for all).
 - Gatwick's Northern Runway DCO (decision due October 2025) will add further cumulative pressures.
-

8. Health and Social Infrastructure

- Health Impact Assessment warns of **strain on local GPs and dentists**, with facilities only phased later.

- Crawley Hospital has no A&E provision, and East Surrey Hospital is already overstretched. The scheme underestimates needs for *acute and primary care capacity*, not just new buildings.
 - Education land is promised but funding is dependent on third parties (WSCC, DfE). Delivery is not secured.
 - Community facilities and mobility hubs are vague, many deferred to later Reserved Matters.
-

9. Retail Impact

- The 1,900 sqm foodstore will **divert trade from Crawley Town Centre**, which has already lost major anchors.
 - This undermines national policy requiring town centre vitality (NPPF paras 90–95).
-

10. Light Pollution

- Lighting Impact Assessment shows residual **moderate adverse effects** on bats, insects, and night skies.
 - Sensitive receptors: Ifield Brook Meadows and **St Margaret's Church views**. Urban skyglow harms biodiversity and heritage landscapes.
-

11. Loss of Ifield Golf Course (Policy Non-Compliance)

The proposal requires the permanent closure of **Ifield Golf Course**, an established 18-hole members' course with c.510 members, founded in 1927.

NPPF Tests (para. 99)

Homes England admit they cannot show the course is surplus (test a). They rely instead on mitigation (test b).

FMG Reports (Homes England's Own Evidence)

Homes England's own consultants (FMG) confirm:

- **Tilgate Golf Centre is not fit to absorb Ifield members**: in 2023/24 it was closed for 85 days and on temporary greens another 65 days due to drainage failures — 40% of the year compromised.
- **Mitigation is speculative**: proposals (adventure golf, 9-hole reinstatement, clubhouse works) are unfunded and uncertain.

- **Not like-for-like:** casual or short-game facilities are no substitute for an 18-hole members' course. FMG concede Goffs Park is "in poor condition".
- **Different playing standard:** Tilgate and Rookwood are harder courses (Slope Index 120/122 vs Ifield 110), and Tilgate's narrow fairways "may limit migration" of Ifield members.
- **Capacity not created:** drainage upgrades would only restore Tilgate's lost capacity, not provide new space for Ifield's 35,000 annual rounds.

Evidence of Need, Not Surplus

- Ifield GC delivers ~35,000 rounds annually, with a thriving junior section and affordable membership model.
- Regional golf provision is already shrinking: closures at West Chiltington, Rusper, Redhill, Reigate, Effingham Park, Horsham Golf & Fitness, reductions at Mannings Heath and Cottesmore, and Gatton Manor pending. At least **117 holes lost** in recent years.

Statutory Consultee – Sport England

Sport England policy resists loss of sports facilities unless NPPF para. 99 tests are met. They clearly are not.

Conclusion

The proposal fails all three NPPF tests:

- Not surplus to requirements.
- Not replaced by equivalent or better-quality provision.
- No alternative recreational benefit outweighs the loss.

Even on this issue alone, the application should be **refused outright**.

12. Ground Conditions

- Phase I ESA confirms potential contamination from historic landfills, golf course chemical use, and Dumfries Pump House.
- Risks of hydrocarbons and ground gas require further intrusive investigation.

13. Section 106 Weaknesses

- Affordable housing tenure mix deferred.
- Gypsy and Traveller provision may be commuted to cash, risking non-delivery.

- Many obligations are caveated and reliant on third parties.
-

14. Cumulative Effects

- ES Chapter 16 acknowledges **cumulative pressures with Kilnwood Vale, Land North of Horsham, and Gatwick Northern Runway DCO**.
 - The Council must also recognise the **true cumulative scenario of 10,000 dwellings** west of Ifield, not just the 3,000 in Phase 1.
-

15. Settlement Coalescence

The site would cause **visual and functional coalescence** between Crawley, Ifield, Rusper and Horsham, eroding settlement identity and rural character. This is contrary to HDPF policies which safeguard settlement separation and landscape gaps. The Planning Inspector in December 2024 already raised concern that Horsham's plan failed to address this cross-boundary impact.

16. Employment and Economic Mismatch

The scheme provides only ~1,400 FTE jobs, heavily reliant on Gatwick and Crawley, where jobs are predominantly low-paid and insecure. Housing delivery far outstrips employment land provision, worsening Crawley's deficit. This conflicts with NPPF para. 8 (economic sustainability) and para. 82 (planning for employment).

Conclusion

This application is **premature, harmful, and fails to demonstrate legal compliance** with water neutrality, heritage protections, biodiversity law, and national policy tests.

The Council has clear grounds to refuse DC/25/1312.

We therefore urge Horsham District Council to **REFUSE** this application.

Yours faithfully,

