

**From:** Planning@horsham.gov.uk <Planning@horsham.gov.uk>  
**Sent:** 03 October 2025 13:19:44 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 03/10/2025 1:19 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:** Ash Cottage Tweed Lane Crawley

### Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Design

Comments: Objection to Phase 1 - West of Ifield Development (DC/25/1312)  
I object to Phase 1 of the West of Ifield development on the grounds of inadequate water management planning.

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1. Assumptions on Water Usage

The Water Neutrality Statement ([https://iawpa.horsham.gov.uk/PublicAccess\\_LIVE/Document/ViewDocument?id=C6B20A7EE6AF47C1BEB1BAB1A7006AC6](https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=C6B20A7EE6AF47C1BEB1BAB1A7006AC6)) uses 85 litres per person per day (L/p/d). This is unrealistic. Government guidance for water-stressed areas recommends 110 L/p/d, which the document itself acknowledges in Section 4.1.

Comparisons for South of England developments:

Source	Year	Usage (L/p/d)	Notes
South East Water	2024/25	145.7	Average domestic consumption
Southern Water	2023/24	136.8	Average domestic consumption
South West Water	2023/24	153.1	Average domestic consumption
Average UK	-	142	Domestic consumption

Water efficiency standards for new developments:

Area	Standard (L/p/d)	Source
England (general)	125	<a href="https://www.labc.co.uk/news/how-get-it-right-domestic-water-usage-new-dwellings">https://www.labc.co.uk/news/how-get-it-right-domestic-water-usage-new-dwellings</a>
Water-stressed areas	110	<a href="https://www.gov.uk/government/news/new-water-saving-measures-to-safeguard-supplies">https://www.gov.uk/government/news/new-water-saving-measures-to-safeguard-supplies</a>
South & Vale	100	<a href="https://www.southandvale.gov.uk/app/uploads/2024/10/Water-Efficiency-Topic-Paper-accessible.pdf">https://www.southandvale.gov.uk/app/uploads/2024/10/Water-Efficiency-Topic-Paper-accessible.pdf</a>
Winchester	110	Same as above

Issues identified:  
- Table 4.5 "Annualised baseline water demand" sums incorrectly: Residential → Landscaping = 986,941 L/d  
- No robust evidence justifying reduction from 110 L/p/d to 85 L/p/d (Section 5.1)  
- Even with restrictors, all incoming water must be potable unless multiple sources are

supplied

- Using 110 L/p/d, total daily demand for 3,000 houses = 779 m<sup>3</sup>/day

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## 2. Abstraction from Boreholes

- The statement anticipates several boreholes, each abstracting 125 m<sup>3</sup>/day
- Legal requirement: Any abstraction >20 m<sup>3</sup>/day requires a license
- No licences currently obtained; supply must be verified before approval
- Arun Valley catchment (Sussex North) cannot sustainably supply additional demand
- Case study: Kilnwood Vale (280 dwellings)  
([https://assets.publishing.service.gov.uk/media/671b779e1b274ea681ff4c67/Combined\\_decision\\_Kilnwood\\_Vale.pdf](https://assets.publishing.service.gov.uk/media/671b779e1b274ea681ff4c67/Combined_decision_Kilnwood_Vale.pdf)) shows Natural England advice: no additional abstraction without demonstrating water neutrality
- Upper Tunbridge Wells Sand Formation: Needs full testing; a few test boreholes are insufficient for flow and water quality assessment

Calculated borehole requirement:

Total demand - Rainwater supply = 779 - 478 ≈ 301 m<sup>3</sup>/day

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## 3. Rainwater Collection and Storage

- Proposed tank volumes (Scenario 1) are ~4% below the required 35-day storage  
([https://iawpa.horsham.gov.uk/PublicAccess\\_LIVE/Document/ViewDocument?id=C6B20A7EE6AF47C1BEB1BAB1A7006AC3](https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=C6B20A7EE6AF47C1BEB1BAB1A7006AC3))
- Scenario volume reductions are provided without supporting calculations (see Table 6.1)

Total daily water management summary:

Parameter	Volume (m <sup>3</sup> /day)
Total demand	779
Rainwater supply	478
Borehole requirement	301

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## 4. Conclusion

Phase 1 does not provide sufficient water management:

- Underestimates water demand per person
- Relies on unsustainable borehole abstraction without licences
- Storage tanks are undersized for 35-day supply
- Lack of supporting calculations for scenarios and treatment

Until these issues are addressed, the application cannot be considered compliant with water neutrality and sustainability standards.

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Kind regards

**Telephone:**

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**Horsham  
District  
Council**

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