



52 Lyndon Road
Sutton Coldfield
West Midlands
B73 6BS
office@cerda-planning.co.uk
07483 009388

Jason Hawkes
Planning Department
Horsham District Council
Parkside, Chart Way
Horsham
West Sussex RH12 1RL

MS/project no. 24.327
09 October 2025

Dear Jason,

Objection to Planning Application Ref. DC/25/1312 from a Technical Perspective – Land West of Ifield, Crawley

On behalf of Save West of Ifield, I write to register our strong objection to the above planning application submitted by Homes England for a strategic-scale development of up to 3,000 dwellings and associated uses on land west of Ifield.

This letter focuses on the significant technical and environmental constraints which make the site wholly unsuitable for development of the scale proposed. Our detailed technical objections are set out in the accompanying Planning Statement of Objection (Appendix 2). The report follows the same structure as a planning statement analysing the proposal and assessing the application from a technical perspective. Please also find an executive summary of the objection report attached to this letter (Appendix 1). This covering letter highlights only the main environmental conflicts and makes clear why permission should be refused.

The key concerns can be summarised as follows:

- **Landscape and Visual Impact:** The development would urbanise over 200 hectares of open countryside, fundamentally altering its character and causing significant harm to the rural setting of Ifield, Rusper, and Faygate. Proposed mitigation cannot replicate the intrinsic value of the existing landscape.
- **Highways and Transport:** The site is poorly served by the local road network and inherently constrained by floodplains and limited access points. Even with the proposed package of measures, the development would generate severe traffic impacts and leave residents heavily reliant on the private car.

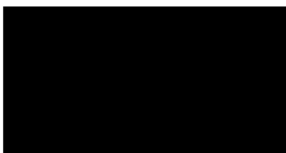
- **Heritage:** The site encompasses and adjoins highly sensitive heritage assets, including the Ifield Village Conservation Area, the Grade I listed Parish Church of St Margaret, and the Scheduled Medieval Moat at Ifield Court. The proposed development would irreversibly harm the setting and significance of these assets, contrary to national and local policy.
- **Flood Risk and Drainage:** The proposed development in Ifield raises serious concerns regarding wastewater infrastructure, particularly the limited capacity of Crawley Sewage Treatment Works, which Thames Water has confirmed is already nearing its permit limits and projected to be exceeded between 2025 and 2030.
- **Ecology and Biodiversity:** The scheme would result in the loss of valuable habitats and severance of ecological corridors. Claims of achieving biodiversity net gain are insufficient to offset the scale of habitat destruction.
- **Open Space and Recreation:** The development would result in the loss of Ifield Golf and Country Club, a valued community facility, in an area already identified as under-provided for golf and recreation. The new open spaces proposed are mitigation for the development's own population and cannot replace this loss.

Taken individually, each of these constraints represents a serious harm. Collectively, they amount to an overwhelming case against development of this site. The application is therefore contrary to multiple policies of the Horsham District Planning Framework as well as the NPPF.

Finally, applying the planning balance under NPPF paragraph 11d, the identified benefits of the scheme are substantially and demonstrably outweighed by the harms. The development is not sustainable and the presumption in favour does not apply.

For these reasons, and as set out fully in our supporting documents, we respectfully urge the Council to refuse this application.

Yours sincerely,



MAX SELLERS BSc (Hons) MSc MRTPI
Senior Planner

Appendix 1 – Executive Summary



Executive Summary – Environmental Objections

This objection demonstrates that the application by Homes England for up to 3,000 dwellings west of Ifield is not environmentally sustainable. The scheme would give rise to significant and irreparable harm across a wide range of technical disciplines. These harms are substantial, cannot be effectively mitigated, and weigh heavily against the granting of planning permission.

Landscape and Visual Impact

The development would urbanise over 200 hectares of open countryside, introducing dense built form into an area that currently functions as a rural buffer between Ifield and surrounding villages. The scale of change would cause major adverse effects on landscape character and on views from public rights of way, undermining both local distinctiveness and countryside protection objectives.

Highways and Transport

The site is constrained by floodplains and limited access points, leaving the local road network incapable of absorbing the scale of additional traffic. The proposed transport package fails to resolve these issues, resulting in severe residual impacts. Opportunities for walking and cycling to Ifield and Crawley are constrained by barriers such as the River Mole and Ifield Brook, meaning residents would remain heavily dependent on the private car.

Heritage

The site encompasses and adjoins highly sensitive assets, including the Ifield Village Conservation Area, the Grade I listed Parish Church of St Margaret, and the Scheduled Medieval Moat at Ifield Court. The rural setting of these assets is fundamental to their significance. Large-scale development would cause serious harm to their setting and character, contrary to the NPPF requirement to give great weight to heritage conservation.

Flood Risk and Water Environment

The proposed development in Ifield raises serious concerns regarding wastewater infrastructure, particularly the limited capacity of Crawley Sewage Treatment Works, which Thames Water has confirmed is already nearing its permit limits and projected to be exceeded between 2025 and 2030. Without significant upgrades, the facility risks breaching capacity during the Local Plan period, leading to more frequent sewage spills into the River Mole. Given that planning, approvals, and construction of new infrastructure could take years, the development is considered premature until such works are completed. Despite Thames Water's acknowledgment of capacity issues, the



planning submission provides no confirmed solutions, with only ongoing modelling assessments noted. Overall, the application fails to adequately address a critical sewerage constraint that must be resolved before further development can proceed.

Ecology and Biodiversity

The site contains a range of habitats and ecological corridors that support wildlife movement across the wider landscape. The proposed development would result in the permanent loss and fragmentation of these habitats. Claims of achieving 10% biodiversity net gain are insufficient to compensate for the scale of loss, and the scheme risks undermining local and regional biodiversity objectives.

Open Space and Recreation

The scheme would result in the permanent loss of Ifield Golf and Country Club, a valued leisure and community facility. The Council's Golf Needs Assessment identifies an existing under-provision of golf facilities in the District. New on-site play and open space is designed primarily to serve the development's own population and does not replace the wider community value of the existing facility.

Summary

It is acknowledged that Horsham District Council cannot currently demonstrate a five-year housing land supply. As such, the tilted balance under NPPF paragraph 11d is engaged. This requires permission to be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

In this case, the identified harms including the permanent loss of countryside, severe transport and access impacts, unjustified loss of valued recreation facilities, increased flood risk, harm to heritage assets, and biodiversity impacts are substantial and irreversible. These adverse impacts significantly and demonstrably outweigh the claimed benefits advanced by the applicant as outlined by the summary table below.

Accordingly, even with the tilted balance engaged, the presumption in favour of sustainable development does not apply, and planning permission should be refused.

Summary of Claimed Benefits vs. Environmental Harms	
Applicant's Claimed Benefits	Key Environmental and Technical Harms
Up to 3,000 new homes, including affordable housing	Permanent loss of over 200 hectares of countryside and landscape buffer between Ifield and surrounding villages



Two new schools and neighbourhood centre	Disproportionate, standalone urban extension that overwhelms Ifield and erodes settlement identity
Employment opportunities during construction and in new employment space	Severe residual traffic impacts on local road network; poor access arrangements constrained by floodplains
New open space and biodiversity net gain (10%)	Loss of Ifield Golf and Country Club, despite identified under-provision of golf facilities; fragmentation of existing habitats and ecological corridors
Transport package including station improvements and walking/cycling links	Site remains physically disconnected; flood risk and natural barriers limit safe and direct active travel routes, leaving residents car-dependent
Contribution to meeting housing shortfall	Irreversible harm to heritage assets: Ifield Village Conservation Area, Grade I Church of St Margaret, Scheduled Medieval Moat at Ifield Court
Community infrastructure and leisure facilities	Insufficient drainage capacity undermines resilience and safety of the site.

Appendix 2 – Objection Planning Statement



Planning Statement

Land West of Ifield
Crawley
West Sussex

On Behalf of Save West of Ifield

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Appendix 1- APP/Z3825/W/24/3350094: Decision

Document Reference:

24.327

Version 1

Date of Issue:

October 2025

Prepared by:

Louise Hinsley

MRTPI

1. Introduction

- 1.1 Cerda Planning Ltd has been instructed by Save West of Ifield to prepare a response to the planning application submitted by Homes England on land west of Ifield, Charlwood Road.
- 1.2 The following sections of this Planning Statement provide a detailed description of the site and development proposals, outlines the relevant planning policies against which the application will be assessed, and presents other material considerations, including the National Planning Policy Framework (NPPF).
- 1.3 Subsequently, this statement identifies the key planning issues and evaluates how the proposal conflicts with the policies of the Development Plan and other relevant planning considerations. After assessing the proposal against current local and national policies, as well as material planning considerations, conclusions are drawn. These conclusions indicate that the principle of development is not met, and the proposals are unsustainable in planning terms.

Site Location and Context

- 1.4 The application site is located to the west of Crawley, on the edge of Ifield, within the administrative boundary of Horsham District Council but immediately adjoining Crawley Borough. It comprises predominantly agricultural fields interspersed with hedgerows, woodland, and watercourses, together with the Ifield Golf and Country Club, which remains an established recreational facility. The River Mole runs through the northern part of the site, with the Ifield Brook and associated meadows forming an important ecological corridor to the east. Public rights of way traverse the site, providing valued rural routes which connect the surrounding countryside with the settlement edge.
- 1.5 The surrounding context is distinctly rural in character. To the north and west the site adjoins open countryside, while to the east it directly abuts the existing built edge of Ifield, Crawley. The historic core of Ifield Village and its Conservation Area lie close to the site, and the nearby hamlets of Rusper and Faygate retain their small-scale, rural settlement pattern. The application site therefore functions as an important landscape buffer which prevents the coalescence of Crawley with surrounding villages and maintains the countryside setting that defines this part of Horsham District.

- 1.6 Despite assertions within the applicant's Planning Statement that the site is in a "relatively sustainable location", it remains physically and visually distinct from the main urban area. The enclosing woodland, hedgerows and watercourses contribute to its identity as part of the rural area, not a natural extension of Crawley. Development of the magnitude proposed (up to 3,000 dwellings) together with schools, employment land, and extensive infrastructure would fundamentally alter this context. It would replace an expansive area of open countryside with a large urban extension, eroding the distinct separation between Crawley and the surrounding rural communities.
- 1.7 The site's scale is such that its redevelopment cannot be regarded as infill or minor expansion. Instead, it would introduce an entirely new settlement form, out of keeping with the modest character of nearby villages and wholly inconsistent with the dispersed rural settlement pattern safeguarded by Strategic Policy 26 (Countryside Protection) and Strategic Policy 27 (Settlement Coalescence) of the Horsham District Planning Framework. Far from respecting local character, the proposal would urbanise an extensive swathe of countryside, undermining the qualities of the rural setting, the role of the land as a buffer between settlements, and the landscape value of this area as recognised in both local and national policy.
- 1.8 The masterplan identifies a limited number of potential access points into the site, largely reliant on existing roads such as Rusper Road and connections towards Ifield Station. However, these routes are constrained and unsuitable for accommodating the scale of traffic associated with a 3,000-home development. Vehicular access would necessarily funnel through narrow and semi-rural roads, creating significant pressure on the local network and undermining highway safety. The lack of robust, deliverable alternatives highlights the site's physical separation from the existing settlement and its dependence on private car use.
- 1.9 In terms of sustainable transport, the site suffers from inherent barriers to integration. The River Mole and Ifield Brook corridors introduce areas of flood risk which restrict opportunities for safe and direct pedestrian and cycle links to Crawley and Ifield. Where connections are theoretically possible, they would require substantial infrastructure interventions that would themselves harm the landscape character of these sensitive corridors. As a result, walking and cycling routes would be indirect and unattractive, failing to encourage a genuine shift. The proposal would therefore remain disconnected from the existing urban area, operating more as a standalone development than a natural extension.

- 1.10 This lack of permeability directly conflicts with local and national policy aspirations to create well-connected, walkable communities. Instead, residents of the proposed development would be heavily reliant on private car travel for access to Crawley, Gatwick, and beyond. Such dependency underscores the unsustainable nature of the site's location and reinforces the case against accommodating strategic growth on this land.
- 1.11 In summary, the site represents an illogical and unsustainable extension to the existing settlement, with unsuitable and inconvenient access to the highway network and sustainable transport options.

Site Planning History

- 1.12 A review of the publicly available records held by Horsham District Council has been undertaken to determine the relevant planning history relating to the site. The review confirms that there are no directly relevant planning applications that have been submitted on the site.

Relevant Case Law

- 1.13 The appeal decisions relevant to this application are outlined below.

1. Appeal reference: APP/Z3825/W/24/3350094 – Land to the West of Storrington Road, Thakeham (ex-Thakeham Mushrooms) – Dismissed (13 June 2025)

- 1.14 A copy of the appeal decision is included in Appendix 1. In the above case the inspector agreed a large scheme (247 dwellings) was out of scale with a small settlement and not sustainably located, despite Horsham's housing shortfall.
- 1.15 In particular it was noted that the development would be "grossly out of scale with the settlement" and would lead to high car dependence. The inspector recognised that whilst the council cannot demonstrate a 5-year housing land supply when assessed against the planning balance, the balance weighed in favour of refusal. The inspector concluded that with regards to the planning balance:
- The proposed scheme would conflict with the spatial strategy of the HDPF and TNP in relation to its nature, substantial scale and poor relationship to

facilities and services, particularly by sustainable modes of travel. The proposed facilities within the scheme, improvements to various PROWs, bus service improvements and associated travel plan measures could not overcome the locational disadvantages of the site or materially reduce the dependence on private vehicles.

- The Framework requires, in paragraph 110, that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, taking into account the differences between urban and rural locations. Policy 40 of the HDPF promotes this approach and therefore attracts full weight as it complies with the NPPF.
- Development must be of an appropriate scale, type and location. Whilst the council cannot demonstrate a 5YHLS, the Inspector found that Policies 2 (strategic development), 3 (development hierarchy) and 4 (settlement expansion) of the HDPF are still capable of attracting moderate weight.

Details of the Proposal

1.16 As stated within the applicant's Planning Statement, a hybrid planning application (Ref: DC/25/1312) has been submitted to Horsham District Council 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 a secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works.
- 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.

- 1.17 According to the submitted Planning Statement and masterplan, the scheme would include a mix of market and affordable homes, together with two schools (a primary school with early years provision and a secondary school with sixth form), a neighbourhood centre, healthcare and leisure facilities, and areas of employment land. A significant network of open spaces and green infrastructure is also proposed, alongside claims of achieving a minimum 10% biodiversity net gain. Transport measures include improvements to Ifield Station, cycle and pedestrian connections, and strategic road interventions.
- 1.18 While presented as a “sustainable new community”, the proposal in reality represents a vast urban extension that would fundamentally alter the rural landscape west of Crawley. At this scale, the development would be comparable to the size of a new town, effectively doubling the existing Ifield settlement and extending Crawley’s urban footprint deep into open countryside. This is not incremental growth but the wholesale transformation of a large swathe of rural land into an intensive urban form.
- 1.19 The introduction of employment land, together with over 1,300 operational jobs, is unlikely to be realised without generating significant traffic and transport pressures. Despite the inclusion of a transport assessment, the evidence does not demonstrate that the local road network can accommodate the volume of new trips associated with 3,000 dwellings and employment uses. The scale of development will inevitably result in greater car dependency, contrary to local and national policy objectives to promote sustainable transport.
- 1.20 Taken as a whole, the proposed development consists of a very large, self-contained urban extension which is out of proportion to Ifield, inconsistent with the settlement hierarchy, and harmful to the intrinsic rural character of this part of Horsham District. Rather than addressing local needs through proportionate growth, it would impose a strategic allocation of regional significance in advance of the plan-making process.

2. Planning Policy

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 2.2 Paragraph 48 of the Framework reconfirms the requirement (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70 of the Town and Country Planning Act 1990) that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Paragraph 2 of the NPPF confirms that the Framework “is a material consideration in planning decisions”.

National Planning Policy Framework (NPPF)

- 2.3 The planning policy framework relevant to this proposal includes both national and local guidance. At the national level, the National Planning Policy Framework (the “Framework”) sets out the Government’s planning policies for England and how these are expected to be applied.
- 2.4 Originally published in March 2012, the Framework was most recently updated in December 2024. It serves as a material consideration in the determination of all planning applications and places a strong emphasis on achieving sustainable development through a balanced approach to economic, social, and environmental objectives.
- 2.5 Paragraph 8 of the Framework identifies three overarching and interdependent objectives which underpin the concept of sustainable development. These objectives should be pursued in mutually supportive ways:
- An economic objective – to support a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and productivity, alongside the provision of infrastructure;

- A social objective – to support strong, vibrant and healthy communities by ensuring a sufficient number and range of homes are provided to meet present and future needs, and by fostering a well-designed, safe built environment with accessible services and open spaces that support health, well-being and social cohesion; and
- An environmental objective – to protect and enhance the natural, built and historic environment, make effective use of land, improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy.

2.6 The Framework promotes **Presumption in Favor of Sustainable Development**:

Paragraph 11 states that “For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to **sustainable locations**, making effective use of land, securing **well-designed places** and providing affordable homes, individually or in combination.

2.7 Regarding NPPF paragraph 11d(i), footnote 7 of the NPPF states *“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and*

other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

- 2.8 Footnote 8 of the NPPF states that relevant development plan policies may be considered out-of-date triggering the presumption in favour of sustainable development when a planning application involves housing and the local planning authority is unable to demonstrate a five-year supply of deliverable housing sites (including the necessary buffer), or when the Housing Delivery Test shows that housing delivery over the past three years has fallen significantly short (i.e., below 75%) of the required level.
- 2.9 Paragraph 34 states that *“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy.”*
- 2.10 Regarding the local plan being identified as out of date and the weight that should be given to the adopted policies, paragraph 232 states:
- “However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”*
- 2.11 Paragraph 48 of the NPPF is clear that planning law requires that applications for planning permission must be determined as per the Development Plan unless material considerations indicate otherwise. The NPPF is in fact a material consideration in regard to the decision-making process. Therefore, the specific policies of the NPPF which are material to the determination of the application are set out below.
- 2.12 Chapter 5 (Delivering a Sufficient Supply of Homes) requires that large housing allocations be brought forward through a plan-led process.

NPPF - Landscape character and settlement harmony

2.13 Relevant policies sit within Chapter 12 (Achieving Well-Designed Places) and Chapter 15 (Conserving and Enhancing the Natural Environment).

- Well-designed places must respect local character, integrating well into existing landscapes. Large expansions should not appear incongruous or urbanise rural edges. Inspectors frequently cite Chapter 12 as requiring developments to complement local settlement patterns and visual context.
- Landscape protection and enhancement is embedded in Chapter 15, which emphasises avoiding harm to valued landscapes, privacy, and habitat integrity particularly acute when proposals “extend” built development into open countryside or reach well beyond settlement confines.

2.14 Paragraphs within Chapter 12 emphasise the importance of creating well-designed places that respond to local character and integrate sensitively into their surroundings. In particular, large-scale developments should avoid appearing incongruous or contributing to the urbanisation of rural edges.

2.15 NPPF paragraphs in Chapters 12 and 15 make clear that large-scale housing proposals must respect and reinforce existing landscape character and settlement form. A proposal of c.3,000 homes at the edge of Ifield risks detrimental settlement-edge harm and erosion of valued rural landscape character.

NPPF - Transport and Highways Considerations

2.16 Relevant guidance is set out in Chapter 9 – Promoting Sustainable Transport of the NPPF. This chapter supports development that prioritises sustainable transport modes and ensures safe and suitable access for all users.

2.17 Paragraph 116 of the NPPF states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

2.18 This means that, provided appropriate mitigation is in place, proposals should not be refused unless they demonstrably result in significant harm to highway safety or the operation of the wider network, taking into account all reasonable future scenarios.

2.19 In terms of this specific application, the following points are relevant:

- This proposal must therefore demonstrate robust, deliverable mitigation particularly on Ifield junctions otherwise refusal is justified.
- It will be important to confirm if the transport assessment submitted in support of the application has analysed all of the surrounding junctions and roads that will be impacted. 3,000 dwellings will generate a considerable amount of traffic.

NPPF - Large Scale Extensions

2.20 For large-scale extensions or major urban expansions, the NPPF inherently demands that proposals do not undermine the existing character or overwhelm infrastructure. This principle applies in both design and landscape sections:

- Any development of this scale must maintain proportionality with the host settlement and avoid dominating the townscape or natural context.
- Infrastructure capacity, in terms of transport, services, and social amenities, must be demonstrably adequate or else development should be refused (as required in Chapters 5, 8, 9, and 12).

2.21 Proposals for large-scale extensions or major urban expansions must be assessed against several key principles embedded within the National Planning Policy Framework (NPPF). These principles span across multiple chapters, including:

- Chapter 5 – Delivering a Sufficient Supply of Homes
- Chapter 8 – Promoting Healthy and Safe Communities
- Chapter 9 – Promoting Sustainable Transport
- Chapter 12 – Achieving Well-Designed Places

NPPF - Design and Landscape Integration

2.22 The NPPF expects that large-scale development should not undermine the character of the host settlement or overwhelm its infrastructure. Specifically:

- Proposals must maintain proportionality with the existing settlement, avoiding dominance over the townscape or natural landscape.
- Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting (Para 135).
- Infrastructure capacity covering transport, utilities, and social amenities must be demonstrably adequate. Where this cannot be achieved, refusal may be justified.

NPPF - Making Effective Use of Land and Promoting Good Design

2.23 Paragraph 124 encourages planning policies and decisions to promote the effective use of land, meeting housing and other needs while safeguarding the environment and ensuring safe, healthy living conditions.

2.24 Strategic policies should aim to make the best use of previously developed or brownfield land, where possible.

NPPF - Planning and Flood Risk

2.25 Paragraph 170 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

2.26 Paragraph 173 – *“A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.”*

NPPF - Conserving and Enhancing the Historic Environment

2.27 Paragraph 212 states that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

2.28 Paragraph 214 is also clear that where a proposed development will lead to substantial harm to or the loss of a designated heritage asset, planning permission should be refused, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

2.29 In consideration, if the identified harm to the heritage assets within or in close proximity of the site is found to be substantial, the applicant must balance the public benefits against the harm. If this exercise is not completed by the applicant, planning permission must be refused.

Development Plan

2.30 The current statutory development plan includes the Horsham District Planning Framework (adopted 2015) (HDPF) and the Ruspur Neighbourhood Plan (made June 2021).

2.31 2011-2028 (Local Plan). The most relevant policies in the context of assessing this proposal are:

- Strategic Policy 1 Sustainable Development
- Strategic Policy 2 Strategic Development
- Strategic Policy 3 Development Hierarchy
- Strategic Policy 4 Settlement Expansion
- Strategic Policy 15 Housing Provision
- Strategic Policy 16 Meeting Local Housing Needs
- Strategic Policy 24 Environmental Protection
- Strategic Policy 25 The Natural Environment and Landscape Character
- Strategic Policy 26 Countryside Protection
- Strategic Policy 27 Settlement Coalescence
- Strategic Policy 34 Heritage Assets and Managing Change within the Historic Environment
- Strategic Policy 38 Flooding
- Strategic Policy 39 Infrastructure Provision
- Strategic Policy 40 Sustainable Transport
- Strategic Policy 43 Community Facilities, Recreation and Leisure

2.32 The Ruser Neighbourhood Plan (Made June 2021) policies most relevant for assessing this proposal are:

- Policy RUS3: Design
- Policy RUS5: Green Infrastructure and Biodiversity
- RUS10: Dark Skies

Shaping Development in Horsham District – Planning Advice Note (2025)

2.33 HDC approved the Shaping Development in Horsham District – Planning Advice Note on the 17th September 2025 superseding the October 2022 Facilitating Appropriate Development (FAD). This document sets out the Council's aspirations and their position on the weight that can be given to current and emerging policy within the context of current legislation, national policy and guidance.

2.34 Whilst this has not been subject to consultation or examination it provides further guidance and direction around HDC's expectation for submitted planning applications and how the LPA will consider planning applications as they are received.

2.35 Through HDC's document Shaping Development in Horsham District – Planning Advice Note, HDC have provided further guidance and direction around HDC's expectation for submitted planning applications and how the LPA will consider planning applications as they are received. While this confirmed that the policy requirements of the HDPF will be expected to be complied with on most matters, it also recognises the significant time that has passed since adoption of the HDPF. The document, therefore, provides guidance on the approach to current expectations that were being explored under the emerging Local Plan such as biodiversity net gain and water neutrality which differ from the adopted HDPF.

2.36 As stated by paragraph 2.4 of this document, the Horsham District Planning Framework's housing supply policies are now considered out of date, meaning they carry less weight in decision-making. This engages the NPPF's 'tilted balance,' creating a presumption in favour of approving housing applications, though the policies may still hold some relevance in planning judgments.

2.37 Paragraph 2.6 continues by confirming that the application of the 'tilted balance' does not mean housing applications will be automatically approved. Each proposal must still

undergo a balancing test under NPPF Paragraph 11d(ii), where decision makers weigh the benefits of development against any adverse impacts.

- 2.38 NPPF Paragraph 232 clarifies that development plan policies are not automatically deemed out of date simply because they were adopted before the most recent version of the NPPF, and that appropriate weight should be given to them based on their consistency with national policy. While policies relating to housing delivery targets, site allocations, and the location of development may be regarded as out of date and therefore carry less weight, the wider policies within the Horsham District Planning Framework and the district's Neighbourhood Plans remain generally up to date and aligned with the NPPF. Consequently, the Council expects that requirements in these areas such as affordable housing, planning obligations, infrastructure, and other on-site provisions must still be met for a development proposal to be supported by the Council. This is supported by paragraph 5.2 of the advice note.
- 2.39 Regarding the Sites identified within the Withdrawn Horsham Local Plan, paragraph 5.7 states *"the Council will consider positively proposals on sites identified in the eLP, which accord with such evidence and are in accordance with (non-housing supply) HDPF or Neighbourhood Plan policies."* This in turn means that all applications are expected to comply with the most relevant policies contained in the HDPF before being supported by the Council.

Local Plan Review

- 2.40 Horsham District Council (HDC) has been preparing a new Local Plan for the period 2023–2040, which will set out planning policies and proposals to guide development across the district.
- 2.41 The Horsham District Local Plan 2023–2040 (HDLP) was formally submitted to the Planning Inspectorate for examination on 26 July 2024. However, early in the examination process, the Inspector cancelled the remaining sessions and issued an Interim Findings Report recommending that HDC withdraw the Plan. The Inspector raised significant concerns regarding HDC's failure to meet the legal *duty to cooperate* with neighbouring authorities, as well as unresolved issues relating to water neutrality.

- 2.42 In August 2025, HDC wrote to the Planning Inspectorate requesting reconsideration of the Inspector's position, particularly in light of anticipated changes to national planning regulations. The Inspector responded by allowing the Council to submit additional evidence for further consideration. In consideration, the Local Plan examination is therefore paused and not withdrawn.
- 2.43 While the site is identified as a draft strategic allocation under Policy HA2 of the emerging Local Plan, the Plan remains unadopted and is still undergoing examination. As such, limited weight can be afforded to its policies at this stage.
- 2.44 Consequently, there is currently no up-to-date adopted Local Plan in place. Given the unsettled status of the emerging Plan and the lack of formal adoption or confirmation of soundness, it would be premature to approve a development of this scale. The proposal risks prejudicing the outcome of the plan-making process and undermining the strategic planning framework that is still under review.
- 2.45 It is acknowledged that as part of the evidence base, the land was reviewed for its potential to deliver future development, Land West of Ifield (reference: SA101). The outcome of the assessment raised the following concerns with regards to landscaping and highways.
- 2.46 Regarding landscape, the assessment concludes that *"Overall, strategic development at this scale will have an impact on what is currently a generally rural landscape and there are areas where the landscape is sensitive to development. Whilst it is recognised there is potential for mitigation, and landscape enhancement in areas where the landscape is already compromised, the overall impact is assessed as unfavourable."*
- 2.47 Regarding the associated highways impact, the assessment stated *"Overall, there are likely to be favourable impacts at the strategic level, given the sustainability and transport benefits of locating strategic development close to Crawley and Gatwick which are significant trip generators within the sub-region. This is balanced against likely unfavourable impacts at the local level, given the limited road and junction capacity and worsening congestion at the local level."*

- 2.48 The assessment concludes by stating that *“The site is therefore considered suitable for allocation. However, any scheme must be carefully designed to deliver high quality development that minimises landscape, biodiversity and other environmental impacts and takes account of its relationship on the edge of Crawley. The development will also need to deliver very high rates of sustainable travel and contribute towards the delivery of a wider multi modal western link.”*

Five-Year Housing Land Supply (5YHLS)

- 2.49 Horsham District Council’s 5YHLS position is currently just 1.0 year as of their April 2025 reporting period. This reflects a significant shortfall relative to the 5-year requirement, meaning the council cannot demonstrate an adequate supply of deliverable housing sites.

- 2.50 In its Authority Monitoring Report (AMR) 2023/24, published on 30 April 2025, the council confirmed:

- A local housing need of 1,357 homes/year (standard methodology).
- A 5-year requirement of 6,785 homes (1 April 2024–31 March 2029).
- A cumulative shortfall of 738 homes from historic under supply, equating to 148 homes/year added to the total.

- 2.51 The council’s own housing delivery trajectory confirms only enough supply to meet 1-year worth of housing, based on policies and commitments in place.

- 2.52 As a result, paragraph 11(d) of the NPPF is engaged – the “tilted balance”. This means that where the Development Plan is silent or out-of-date, planning permission should be granted unless:

- The adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or
- Specific policies in the Framework indicate that development should be restricted.

3. Planning Assessment

3.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA) and Section 70(2) of the Town and Country Planning Act 1990, applications are to be determined in accordance with the development plan, unless material considerations indicate otherwise. Paragraph 2 of the NPPF confirms that the Framework “*is a material consideration in planning decisions*”.

3.2 In this respect, it is considered that there are two principal issues that need to be considered in the determination of this application. These relate to whether the proposals meet the tests set out in local and national planning policy, and whether the material benefits that the proposals would deliver would outweigh any unacceptable impacts. It is therefore considered that the main matters to address when assessing this proposal are as follows:

- Principle of development
- Landscape
- Heritage
- Ecology
- Highways
- Flood Risk & Drainage
- Open Space, Recreation and Loss of Ifield Golf and Country Club

Principle of Development

3.3 The NPPF is clear that development proposals that accord with an up-to-date Development Plan should be approved without delay (Para 11c). The starting position in assessing whether the principle of development is acceptable in accordance with the Development Plan concerns those policies most relevant and important as set out within the Development Plan documents.

3.4 It is considered that the below policies are the ‘most important’:

- Strategic Policy 2 - Strategic Development
- Strategic Policy 3 – Development Hierarchy

- Strategic Policy 4 - Settlement Expansion
- Strategic Policy 15 - Housing Provision
- Strategic Policy 26 - Countryside Protection
- Strategic Policy 27 - Settlement Coalescence

- 3.5 The proposed residential development of up to 3,000 dwellings on this site must comply with Horsham's Development Plan, ensuring it integrates effectively with the surrounding area, and provides sustainable development.
- 3.6 The site is located outside of a defined settlement boundary and is therefore defined as within the countryside, where development is not typically supported and as such should be considered against policies concerning the countryside and development outside of the defined settlement boundaries.
- 3.7 The adopted development plan for Horsham District remains the Horsham District Planning Framework (HDPF, 2015). The HDPF establishes a clear spatial strategy, through Policies 2, 3 and 4, that directs large-scale housing growth to defined strategic sites identified through the plan-making process. The application site is not allocated within the HDPF for major development, and it is located outside of a designated settlement boundary. On this basis alone, the proposal conflicts with the adopted plan.
- 3.8 Strategic policy 2 establishes that strategic development should only take place on sites specifically allocated within the plan to meet identified needs. The application site is not allocated within the HDPF, and its approval would therefore run contrary to the Council's adopted spatial strategy. Strategic development of this scale should be planned, ensuring coordinated delivery of housing and infrastructure in locations assessed as sustainable through the Local Plan process.
- 3.9 In terms of the impact on the character of Ifield, strategic policy 4 permits settlement expansion only where it is of an appropriate scale, respects the setting and character of the settlement, and does not lead to unsustainable growth. Introducing a large new urban extension to the west of Ifield would represent a disproportionate level of growth. The scheme would significantly alter the settlement edge, leading to the loss of countryside character and effectively doubling the size of the community in a single phase of growth. This is inconsistent with the careful, proportionate expansion envisaged by Policy 4.

- 3.10 Strategic policy 15 sets out the housing requirements for the district, to be met through planned growth on allocated sites. Whilst the district faces pressure to deliver housing, Policy 15 does not support speculative proposals outside the defined allocations and settlement boundaries. The Council is in the process of revising its housing strategy through the emerging Local Plan, which has been paused at examination. Bringing forward this site in advance of an adopted spatial strategy would undermine Policy 15 and the plan-led approach to housing delivery. Although it is recognised that this policy is now 'out-of-date' and carries little weight given the age of the HDPF, nevertheless, it is still worth considering all conflicts.
- 3.11 Policy 26 seeks to resist development outside of built-up area boundaries (BUABs) other than where it is essential to its countryside location and to meet either the needs of agriculture or forestry, mineral or waste extraction, quiet recreational uses or for some other reason to enable sustainable rural development. The masterplan shows significant urbanisation of currently undeveloped countryside west of Ifield, with extensive loss of open fields and rural setting. The visual and physical impact of such development would erode the rural character of the area in direct conflict with Policy 26.
- 3.12 Furthermore, strategic policy 27 is particularly relevant given the site's location between Crawley and the wider Horsham district. The scale and form of the proposed masterplan risks contributing to the physical and perceived coalescence of Crawley with surrounding villages, undermining their separate identities. The development would substantially close the existing gap of open countryside that currently provides separation and definition to these settlements, contrary to Policy 27.
- 3.13 The location of the proposed development at West of Ifield immediately adjacent to the Crawley boundary raises a legitimate concern of functional and visual coalescence between Crawley, Horsham and rural settlements such as Rusper and Ifieldwood. Throughout the documents submitted with the application, there's a clear implication that the site serves more as an extension of Crawley rather than being meaningfully integrated into Horsham. This blurs local identity and directly conflicts with the HDPF's intentions.

- 3.14 In consideration of the above, the proposed development is undoubtedly in conflict with the adopted Development Plan. The proposed development conflicts with multiple key policies of the HDPF. It is not an allocated strategic site, it represents an excessive and unsustainable scale of settlement expansion, it would result in the loss of countryside and contribute to settlement coalescence, and it undermines the district's housing strategy by predetermining the location of future growth outside the plan-making process. Although the adopted HDPF is out of date, weight is still attributed to the adopted policies, and any conflict must be considered during the decision-making process.
- 3.15 Paragraph 232 of the National Planning Policy Framework (NPPF) states that weight should be given to policies in existing plans according to their consistency with the Framework. The closer a policy aligns with the objectives of the NPPF, the greater the weight it should carry. Although 10 years old, the objector considers that the HDPF can be considered to be consistent (even if not fully consistent) with the objectives set out within the NPPF and should therefore be afforded more than limited weight. This statement is supported by paragraph 6.2.4 of the applicant's Planning Statement which states that *"Therefore, whilst significant weight is applied to the HDPF (2015), no weight is applied to its housing supply policies."*
- 3.16 Regarding the prematurity of an application of this scale, this concern is reinforced by Paragraphs 50 and 51 of the NPPF.
- 3.17 Paragraph 50 states that *"arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*
- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area."*

- 3.18 Paragraph 51 *“Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.”*
- 3.19 The Council has sought to update its Local Plan for the period 2023–2040. However, the submitted plan was paused at examination in late 2024, with the Inspector’s interim findings (April 2025) recommending withdrawal on grounds of soundness and legal compliance. The draft policies and allocations in that plan therefore carry limited weight. The absence of an up-to-date Local Plan does not justify approval of speculative large-scale development, particularly one of this magnitude, which would in effect pre-determine the district’s spatial strategy in advance of a new lawful plan.
- 3.20 Paragraph 50 of the NPPF (2024) acknowledges that arguments of prematurity are unlikely to justify refusal of planning permission, other than in the limited circumstances where two tests are met. First, the development must be so substantial, or its cumulative effect so significant, that granting permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan. Second, the emerging plan must be at an advanced stage but not yet formally part of the development plan.
- 3.21 This proposal clearly meets the first test. At approximately 3,000 dwellings, the development constitutes a major strategic urban extension that would predetermine fundamental decisions about the scale and distribution of future growth within Horsham District. The Council’s spatial strategy for the next plan period has not yet been finalised, following the Inspector’s recommendation that the submitted Local Plan (2023–2040) be withdrawn on grounds of soundness and legal compliance. However, the Council is currently preparing additional information in response to the Inspector’s findings. By approving this application now, the authority would, in effect, fix the location of a strategic allocation in advance of the proper plan-making process, prejudicing the opportunity to consider alternative sites and spatial strategies across the district.
- 3.22 The second test is also engaged. Although the Horsham Local Plan Review was submitted for examination in 2024, the process has been paused, and the Inspector has advised withdrawal. While the plan is therefore not at the point of adoption, it had reached an advanced stage in preparation and examination, with the Council required

to return to the drawing board. The importance of ensuring that new allocations are properly tested through a lawful, evidence-led plan-making process is therefore paramount. Approving this speculative development ahead of that process would prejudice the outcome of the next Local Plan review.

- 3.23 Paragraph 51 of the NPPF further requires that, where refusal is based on prematurity, the local planning authority should indicate clearly how granting permission would prejudice the outcome of plan-making. In this case, prejudice is evident in two critical respects. First, the allocation of such a large site outside the adopted plan would undermine the integrity of the plan-led system by removing the Council's ability to determine, through consultation and evidence, the most sustainable distribution of growth. Second, it would constrain the options available to the new Local Plan by effectively committing the district to a strategic allocation at Ifield regardless of wider sustainability, infrastructure and environmental considerations.
- 3.24 It is therefore recognised that there is conflict with NPPF paragraphs 50 and 51. On this basis, the proposal is considered to be premature in accordance with NPPF Paragraphs 50 and 51. Its approval would fundamentally prejudice the outcome of the plan-making process and undermine the preparation of a new sound Local Plan for Horsham.
- 3.25 In addition to the above, chapters 12 and 15 of the NPPF emphasise that substantial development proposals must respect the existing settlement pattern, landscape character, and infrastructure capacity. In the absence of a sound Local Plan identifying appropriate strategic sites, proposals of this scale are considered premature and risk prejudicing the outcome of the plan-making process. As discussed within the subsequent sections of this report, it is considered that the proposal would in fact have a significant negative impact upon the landscape, local highways infrastructure and the settlement character by increasing the coalescence of nearby settlements.
- 3.26 The Council is currently preparing its emerging Local Plan, which is under review by the Planning Inspector. At present, there is no up-to-date adopted Local Plan in place, and the Council are unfortunately unable to demonstrate a five-year housing land supply (5YHLS). As a result, key policies such as the Spatial Strategy and Settlement Hierarchy that are essential for assessing the suitability of large-scale extensions are considered to be out of date, and the NPPF paragraph 11d is activated. However, this

does not mean that no weight can be attributed to these policies within the planning balance. The weight is merely limited when compared to an adopted Local Plan that is considered to be in-date.

- 3.27 In summary, the proposed development lies outside a defined Built-Up Area Boundary and is therefore considered to be within the countryside, where development is generally resisted unless it meets specific criteria outlined in the HDPF. The proposal does not currently benefit from allocation within an adopted Local Plan, nor does it demonstrate compliance with the requirements of Policies 2, 3, 4, 15, 26, or 27 of the HDPF.
- 3.28 Furthermore, in the absence of an up-to-date adopted Local Plan, and with the emerging plan still under examination, the strategic framework for assessing large-scale development remains unsettled. The scale and location of the proposal raise concerns regarding prematurity, as outlined in Paragraphs 50 and 51 of the NPPF. Granting permission at this stage risks undermining the plan-making process and prejudging decisions that should be determined through a comprehensive and strategic planning approach.
- 3.29 As such, significant concerns are raised regarding the principle of development, and it is considered that the proposal is premature in the context of both local and national planning policy. The application represents a premature and unsound strategic allocation that is inconsistent with the adopted development plan and with national policy. In the absence of an up-to-date Local Plan, it is vital to resist speculative large-scale proposals that would cause permanent landscape, highways and settlement impacts while undermining the plan-led system. The principle of development is therefore unacceptable.
- 3.30 Whilst the current adopted local plan is considered out of date, any decision on the site should be assessed in accordance with paragraph 11d of the Framework, which advises that planning permission should not be granted if the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In this case, it is presented in the following sub-headings that there are significant and demonstrably adverse impacts if development were to be permitted in this location.

Landscape

- 3.31 Chapter 15 of the Framework (2024) seeks to protect and enhance valued landscapes. At paragraph 135, the Framework (2024) states that developments should ensure that they are sympathetic to the local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 3.32 HDC seeks to maintain and where appropriate enhance the beauty and amenity of both the natural and built-up areas of the District. Strategic Policy 25 of the HDPF (2015) states that the Council will support development proposals which protects, conserves and enhances the landscape and townscape character, and maintains and enhances the green infrastructure network and the existing network of geological sites and biodiversity.
- 3.33 Policy RUS3 of the Rusper Neighbourhood Plan states that proposals should satisfactorily take into account the retention of key views out to the countryside.
- 3.34 The Site is located within a parcel of land adjoining Ifield Wood and Ifield Brook Meadows.
- 3.35 The location of the proposed development appears isolated and disjointed from the settlement boundary, with a linear green strip (Ifield Brook Meadows LWS) between Crawley and the proposed development. The proposed development does not integrate well with the surrounding built landscape and appears to conflict with the rural landscape. It is a strongly enclosed landscape with confined views and a sense of isolation and remoteness, despite the closeness of large towns and roads.
- 3.36 The application raises concerns regarding the loss of valuable countryside. The proposed development would result in the irreversible loss of open countryside that currently serves as a vital green buffer between Crawley and Horsham. This area is cherished for its rural character and biodiversity, and its destruction would significantly alter the landscape and local identity. It is considered that development of the land would have significant adverse effects on the landscape within the site and from surrounding receptors, in particular those from Rusper Road, Lower Barn and the properties within the Maple development.

- 3.37 Although the proximity of Gatwick Airport and Crawley reduce tranquillity in this area, there is a notable absence of light pollution during the hours of darkness, so the character of the area is particularly sensitive to any increase in light pollution such as that arising from large scale urban development.
- 3.38 Residential development of this proposed scale would inevitably bring increased levels of noise, traffic, artificial lighting and human activity that would have a radical and adverse effect on the peace and tranquillity of this rural land.
- 3.39 The Horsham District Landscape Capacity Assessment (HDLCA), prepared in 2024, is an objective and consistent assessment of the capacity of land around existing and new settlements to accommodate new housing and employment development. More specifically it seeks to identify areas where new development could be accommodated without unacceptable adverse landscape and visual impacts. The application site covers areas 1 – 7 in Zone 1 ‘North Horsham to Crawley.’ Most of the landscape is classed as having low capacity (part 1 and 4). unable or only has very limited potential to be able to accommodate the specified type and scale of development without unacceptable adverse landscape and visual effects or compromising the values attached to it, taking account of any appropriate mitigation.
- 3.40 Parts 2,5, 6 and 7 immediately adjoining the boundary of Crawley were assessed as having moderate capacity. Regarding these parts, the assessment states *“an ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation. There is a need for each proposal to be considered on its individual merits to ensure there are no unacceptable adverse impacts.”*
- 3.41 The report advises that “Zone 1 comprises a broad swathe of land around extending from the western edge of Crawley to the southwest along the A264 corridor, and then around the north and eastern edges of Horsham. The land falls within both the High and Low Weald Landscapes, and at a District Level is covered by Landscape character areas K1, K2, I2 and L1. The land is predominantly flat to gently undulating, comprising a mixture of farmland, wooded areas and hedgerows. In the High Weald to the east of Horsham the landscape contains wooded ghylls and commercial forestry. Zone 1 has some urban influences, including the settlement edges of Horsham and Crawley, as well as the A264 and rail corridor that links Horsham and Crawley.

- 3.42 There is no evidence to support the suggestion that the development of the site would somehow integrate with a wider settlement edge. Whilst the development to the south would partly have some connection with the built settlement edge, the development would amount to a distinct incursion into the rural setting due to the Ifield Brook Wood along most of the eastern boundary.
- 3.43 Furthermore, as part of the evidence base for the emerging local plan, the land was assessed for future development potential. The Assessment concluded that in regard to landscape *“strategic development at this scale will have an impact on what is currently a generally rural landscape and there are areas where the landscape is sensitive to development. Whilst it is recognised there is potential for mitigation, and landscape enhancement in areas where the landscape is already compromised, the overall impact is assessed as unfavourable.”*

Heritage

- 3.44 The application site encompasses and adjoins a range of highly sensitive heritage assets which derive much of their significance from their open and rural setting. Directly to the east lies the Ifield Village Conservation Area, which includes the Grade I Ifield Quaker Meeting House, and the Grade I Listed Parish Church of St Margaret, located approximately 170 metres from the site boundary. The Church and surrounding historic core of Ifield Village are characterised by their intimate scale and strong visual and functional relationship with the adjoining countryside. The medieval moated site at Ifield Court is a Scheduled Ancient Monument excluded from the development site boundary but is nevertheless an important asset impacted by the development.
- 3.45 The Ifield Village Conservation Area (IVCA) lies in the north-west corner of Crawley. It was first designated in 1981 around the church, recognising its historical and architectural significance as well as its setting close to meadows and open countryside. The boundaries were later extended in 1992 to cover Ifield Village Green, Rectory Lane, and Tweed Lane, and again in 2013 to include Langley Lane and part of Ifield Green. This is confirmed within the Ifield Village Conservation Statement (2018).
- 3.46 Ifield Village holds conservation area status because it has preserved its distinct identity as a dispersed rural settlement centred around a historic church and public house. Alongside its notable buildings, features such as Ifield Village Green also play

an important role in shaping the area's historic character. Importantly, the historical significance of Ifield was that it was not a nuclear village but was in fact a scattered rural community.

- 3.47 Historically, much of the land now within the Ifield Village Conservation Area (IVCA) formed part of the parish's common land. This heritage is still evident today in the preserved areas of open space, most notably the Village Green, the adjoining playing fields, and the surrounding fields of the Gurdwara. These spaces not only provide a visual link to the village's rural past but also reflect the traditional role of common land as places for grazing, community gathering, and local subsistence. Equally significant is the enduring pattern of footpaths, bridleways, and rural lanes that weave through the conservation area and extend into the wider landscape. These historic routes illustrate how generations of residents, farmers, and traders moved across the countryside, connecting homes, farmland, and places of worship. Their survival offers an authentic insight into the settlement's evolution and underlines the deep-rooted relationship between Ifield's community and its surrounding rural environment.
- 3.48 The Ifield Village Conservation Statement (2018) states that the primary purpose of Ifield Village Conservation Area is to preserve or enhance its village character and semi-rural setting. The statement also acknowledges that Views towards open areas beyond the town are important to the historic setting of the Conservation Area and should be preserved. The statement explicitly states that *"Development that impinges on these views will not be permitted."*
- 3.49 In addition to the above, several grade II listed assets as well as several locally listed buildings adjoin or are in close proximity of the site.
- 3.50 Concerns are raised with regards to the impact of the development on the setting of the Ifield Village Conservation Area, and in particular, the view of St Margaret's church will be compromised. The scheduled medieval moat at Ifield Court is a nationally protected monument together with associated agricultural and residential buildings. The impact to these assets will be significant as well as irreversible.
- 3.51 The proposed development of up to 3,000 dwellings, together with schools, employment uses, and extensive infrastructure, would introduce a substantial new urban extension immediately adjacent to these assets. In doing so, it would irreversibly

transform their setting from open countryside to a dense suburban landscape. The Ifield Court scheduled moat, for example, would lose much of its rural isolation, with development bringing visual disruption, noise, and activity to within a short distance of the monument. Likewise, the historic relationship between the Parish Church of St Margaret and its rural surroundings would be overwhelmed by the encroachment of large-scale built form immediately to the west, eroding the contribution that the setting makes to its significance.

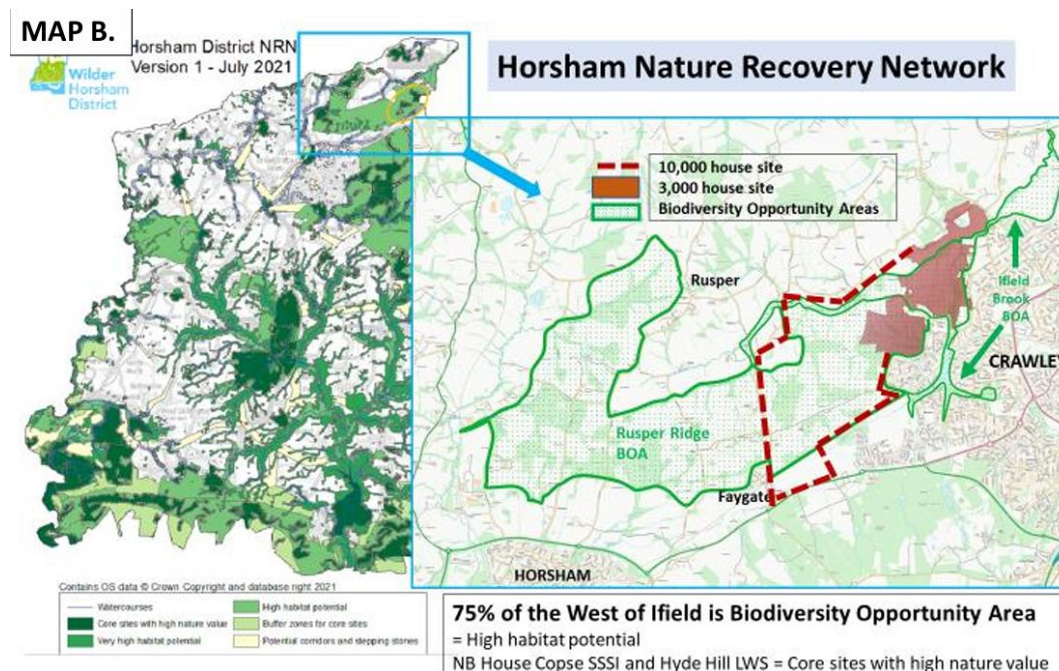
- 3.52 The Ifield Village Conservation Area would also suffer serious harm. Its character is defined by the small-scale historic village core and its visual connection with open countryside. This proposed development would overwhelm the Conservation Area with urban massing on its western edge, undermining both the character and appearance of the area and the special interest for which it is designated. A large amount of traffic would undoubtedly be re-routed through Ifield Green disrupting the ambience and setting of this area that is currently rural in nature. Additionally, the loss of continuity in footpaths across the conservation area and into the surrounding farmland would impact on the purpose and historical significance of the conservation area.
- 3.53 The NPPF (2024) requires that great weight is given to the conservation of heritage assets, irrespective of the level of harm, and confirms that harm should only be justified where outweighed by public benefits and supported by clear and convincing evidence (Paragraphs 212–214). Local Policy 34 of the Horsham District Planning Framework similarly requires that the settings of heritage assets are conserved and enhanced. In this case, the harm to the Grade I listed Parish Church of St Margaret, the Ifield Village Conservation Area, and the Ifield Court scheduled moat would be significant and permanent.
- 3.54 The scale and nature of the proposed development means that mitigation through landscaping or buffer zones would likely not avoid this harm. The loss of rural context cannot be replicated or replaced.
- 3.55 It is therefore concluded that the proposed development would result in substantial and unjustified harm to the historic environment, contrary to both the Horsham District Planning Framework and the NPPF. Planning permission should be refused on heritage grounds. More to the point, Homes England must have carried out a planning balance in accordance with NPPF paragraph 214. If this has not been completed, the

Council must refuse planning permission as the development would be found to be unsustainable.

Biodiversity

- 3.56 The site is bordered by Ifield Wood to the north, Ifield Brook Meadows Local Wildlife Site (LWS) to the East and Hyde Hill Woods (LWS) to the south. Other sites not directly adjoining the site but in close proximity include Ifield Mill Pond LWS, Willoughby Fields Local Nature Reserve (LNR) and House Copse Site of Special Scientific Interest (SSSI).
- 3.57 The scale of development poses a serious threat to local ecosystems. The area supports a range of wildlife and habitats that may not be adequately protected or compensated for, even with mitigation measures. The cumulative impact of such a large-scale scheme could undermine biodiversity net gain objectives. The site is rich in valuable habitats and boosts a high level of biodiversity, this is all threatened to be lost if the land is built on.
- 3.58 The Horsham District Nature Recovery Network report sets out a potential network recovery plan for Horsham District, taking advantage of the existing areas with biodiversity value or high biodiversity potential and considering how they could be improved and linked together. The report has been prepared in partnership with the Sussex Wildlife Trust. The report shows a Biodiversity Opportunity Area across the land to the west of Ifield (please see figure 1 below).
- 3.59 The following subsections take figure 1 into consideration summarising the impacts the proposal would have to specific species.

Figure 1 – Horsham Nature Recovery Network



Source: Horsham District Nature Recovery Network report and Save West of Ifield

Bats

- 3.60 Concerns are raised with regards to the impact on the Bechstein's bat roosts. It is acknowledged that roosts have been recorded at the centre of the site and on the perimeter of the golf course (to the south).
- 3.61 Bechstein's are uncommon throughout their range and have been classified as 'Near Threatened'. They are listed on Annex II of the European Habitats Directive, which gives them enhanced protection, and they are a UK Biodiversity Priority Species (JNCC 2007).
- 3.62 The roosts that have been recorded are part of a large colony which extends from the north of Rusper Village to the north of Charlwood and Eastwards to Ifield and the A264. This makes the colony one of the largest within the UK and is of national importance. Furthermore, the only known Bechstein's maternity roost in the UK found within a building is located on the eastern side of Crawley, which has been monitored annually for almost 20 years.

- 3.63 The proposed development and associated landscape removal will have a detrimental impact on protected species known to inhabit the area. While the biological report submitted by Homes England states that no bat roosts were recorded within the redline boundary, this does not reduce the ecological value of the surrounding environment, which provides highly a suitable habitat for a range of bat species
- 3.64 The tranquillity and dark corridors currently afforded to bats are likely to be disrupted by construction activity, lighting, and increased human presence, potentially causing displacement or behavioural changes.

Newts

- 3.65 The great crested newt (GCN) is strictly protected by British and European law. GCN have been recorded across the site. The Naturespace Partnerships assessment used as part of the District Level Licencing scheme shows that West of Ifield has been classified as Red Impact Zone “highly suitable habitat being the most important area for Great crested newts (and therefore with the highest potential impact)”. The GCN population is highly threatened by this proposed development.
- 3.66 Other important and legally protected Amphibians and Reptile species have been recorded on the site and will be threatened by any future development including smooth newt, Grass Snake, Slow Worm and Common Toad.

Brown Hairstreak butterfly and other protected insects

- 3.67 The site is important for butterfly species, and one species which is especially vulnerable to the proposed development – the Brown Hairstreak – is a protected species under UK law. There are numerous records of this species on and around the site in the neighbouring Local Wildlife Site, Ifield Brook Meadows.
- 3.68 The Brown Hairstreak has a specific habitat requirement i.e. it is dependent upon a particular host plant, Blackthorn, for its lifecycle. Hedgerows containing Blackthorn are common on the site as they criss-cross the site and surrounds. Sympathetic management of these hedgerows is important for the continued sustainability of the local population. The removal of the hedgerows to allow for the development would have a detrimental impact on the environment for the Brown Hairstreak.

- 3.69 Other notable butterfly species can be found in and around the Hyde Hill Woods LWS, which supports a large number of species including uncommon or localised UK BAP priority species such as Dingy Skipper, White Admiral and Small Heath. These species also need specific habitats to thrive.

Birds

- 3.70 The site boasts an abundance of breeding and visiting birds, including a large number of protected and priority species. Amongst the notable birds recently recorded on the site are species of conservation concern and Red Listed due to their decline and vulnerability to habitat loss e.g. Yellowhammer, Skylark, Linnet, Hawfinch, and Mistle Thrush. In addition, birds classified as Amber Listed such as Tawny Owl, Meadow Pipit, Bullfinch and Common Whitethroat have been known to be recorded on the site.
- 3.71 Ifield Mill Pond LWS is regularly surveyed as part of the Wetland Bird Survey (Webs). Kingfishers occur regularly in the Webs survey records and there are several records of Kingfishers breeding very close to the development site.

Ifield Brook Meadows Local Wildlife Site

- 3.72 Ifield Brook Meadows comprises 22.8ha of unimproved meadows and woodland around Ifield Brook, sitting directly on the western boundary. They are designated both as a Local Wildlife Site (by Sussex Wildlife Trust) and Local Green Space (by Crawley Borough Council), of note it is the only one in the borough. Ifield Brook Meadows currently form Crawley's only remaining rural fringe. The northern half of the LWS is also part of the Ifield Village Conservation Area.
- 3.73 The LWS would become isolated, surrounded by residential development on all sides. This fragmentation of habitat would significantly restrict the movement of species and limit opportunities for biodiversity growth and ecological connectivity. Without appropriate buffers or green corridors, the LWS risks becoming an ecological island, undermining its long-term viability and contribution to the wider green infrastructure network.
- 3.74 The proposal to introduce additional footpaths and cycle routes connecting the site to Crawley raises concerns about increased human interaction within sensitive ecological areas. Greater footfall and recreational use could disturb wildlife, degrade habitats, and reduce the ecological value of the site. Without careful management, these routes

may lead to trampling, littering, noise, and other pressures that undermine biodiversity objectives.

- 3.75 In conclusion, although the proposed development does not directly build over the LWS, its proximity will severely degrade the site's high biodiversity value. The development would disrupt ecological connectivity to the west, fragmenting habitats and isolating species. Additionally, the anticipated increase in human activity particularly from users crossing the site via new footpaths and cycle routes will further disturb wildlife and diminish the site's ecological integrity.

Hyde Hill Wood Local Wildlife Site

- 3.76 Hyde Hill Woods comprises approximately 23 hectares of ecologically rich habitat, including extensive areas of priority deciduous woodland and a significant proportion of ancient woodland. Although the woodland lies just outside the development boundary, it is immediately adjacent to the proposed site and will inevitably be affected by indirect impacts. These include increased levels of noise and artificial light, which can disrupt nocturnal species and alter natural behaviours.
- 3.77 The woodland is also expected to experience increased footfall and recreational pressure as a result of its proximity to new housing and proposed access routes. This raises serious concerns about trampling of sensitive ground flora, disturbance to breeding birds and mammals, and degradation of habitat quality. Of particular concern is the presence of a recorded roost of Bechstein's bats that are a rare and highly protected species under UK and European law. These bats are especially sensitive to disturbance and habitat fragmentation, and their presence highlights the ecological importance of the site.
- 3.78 The development poses a high risk of biodiversity net loss at Hyde Hill Woods. The cumulative impacts of human disturbance, habitat degradation, and light and noise pollution could irreversibly damage this ecologically valuable site and compromise its role in supporting rare and protected species.

Ifield Wood

- 3.79 Ifield Wood is an undesignated but ecologically valuable site estimated to cover approximately 25 hectares. It comprises priority deciduous woodland and areas of 'wood pasture', with a diverse range of habitats including ponds, wet woodland, ancient

woodland, and veteran trees. Much of the woodland is classified as ancient, making it irreplaceable in terms of biodiversity and ecological function.

3.80 Although not within the development boundary, Ifield Wood lies immediately adjacent to the north-western edge of the site and is therefore highly vulnerable to indirect impacts. These include:

- Noise and light pollution from nearby residential areas, which can disrupt nocturnal species and alter natural behaviours.
- Edge effects, where the ecological integrity of the woodland is compromised by changes in microclimate, invasive species, and human activity at its boundaries.

3.81 The proximity of the proposed development to Ifield Wood poses a serious risk to its ecological health and biodiversity. The proposed development could lead to long-term degradation of this valuable habitat, undermining its role in supporting species diversity and ecological connectivity in the wider landscape.

House Copse SSSI

3.82 House Copse sits 660m from the boundary of the West of Ifield. It is designated as an SSSI because it is a particularly rare type of ancient woodland almost unknown elsewhere in Southern England – Small-leaved lime and Hornbeam coppice.

3.83 House Copse SSSI is legally protected under Section 28 of the Wildlife and Countryside Act 1981 and therefore development work near this site requires detailed survey and an impact assessment across the surrounding area.

Conclusion

3.84 The proposed development presents a significant and unacceptable risk to the area's rich and interconnected ecological network. The scale and location of the scheme threaten to irreversibly damage priority habitats, ancient woodland, and designated wildlife sites. The site and its surroundings support a wide range of protected and priority species including Bechstein's bats, great crested newts, the Brown Hairstreak butterfly, and numerous red- and amber-listed birds all of which are highly sensitive to habitat loss, fragmentation, and increased human disturbance.

- 3.85 The development would isolate key habitats such as Ifield Brook Meadows LWS, Hyde Hill Woods, and Ifield Wood, undermining biodiversity connectivity. The introduction of new access routes and recreational pressure would further degrade these sensitive environments, while the omission of critical species such as Bechstein's bats from the ecological assessment raises serious concerns about the adequacy and robustness of the submitted evidence base.
- 3.86 Given the national importance of the species and habitats affected. The cumulative ecological harm, combined with the irreversible loss of biodiversity and green infrastructure, clearly demonstrates that the proposed development is not sustainable.

Highways

- 3.87 The NPPF outlines that transport policies have an important role to play in facilitating sustainable development but also contributing to wider sustainability and healthy objectives. In considering developments that generate significant amounts of movements, local authorities should seek to ensure they are located where the need to travel will be minimised, and the use of sustainable transport modes can be maximised.
- 3.88 Policy 40 of the HDPF (2015) sets out HDC's commitment to developing an integrated community connected by a sustainable transport system, and in order to manage anticipated growth, proposals which promote an improved and integrated transport network will be supported.
- 3.89 In determining planning applications, the NPPF (2024) at paragraph 116 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts on the road network would be severe.
- 3.90 The development includes enabling infrastructure such as the Crawley Western Multi-Modal Corridor, but it remains unclear whether this will sufficiently address the increased traffic volumes. Local roads, particularly Charlwood Road and surrounding routes, are already under pressure. The proposal risks exacerbating congestion and reducing air quality.
- 3.91 The Crawley Western Multi-Modal Corridor (CWMMC) is proposed to run north–south through the site, ultimately forming part of a wider link between the A264 to the south

and the A24 to the west. However, in its current form the CWMMC does not provide a direct connection into Crawley or onto a strategic highway. Instead, it connects internally to Rusper Road in the south-west and Charlwood Road to the north-east, both of which are rural, single-carriageway roads operating at or close to capacity. A third vehicular exit is also proposed via Rusper Road, where the existing alignment would be diverted into the CWMMC before reconnecting to the existing road north of the site (see Application Drawing WOI-HPA-PLAN-PP02-01; Transport Assessment Appendix H Part 1; Supplementary Document on Changes to Rusper Road). While this third exit is downplayed in the applicant's documentation, it nonetheless provides full access for development traffic towards Rusper, Lambs Green, Faygate and beyond. As a result, the development would inevitably disperse large volumes of traffic onto inappropriate rural routes, rather than providing a direct and strategic connection to Crawley.

- 3.92 The applicant's documents present these access arrangements in a confusing and inconsistent manner, frequently emphasising the new signalised junction at Charlwood Road / Bonnets Lane / Ifield Avenue / Ifield Green as the primary point of access, alongside a bus-only access to Rusper Road near the former Golf Course entrance. This has given rise to the impression that there are only one or two vehicular exits. However, as set out above, a third general traffic exit is confirmed by the submitted plans and supplementary highway documents. All three access points are therefore relevant and must be assessed together.
- 3.93 The proposed development raises serious concerns regarding transport infrastructure and accessibility. While the CWMMC is intended to support the scheme, its current configuration fails to provide a direct strategic link into Crawley or to major transport routes. Instead, it channels traffic onto narrow, rural roads such as Rusper Road and Charlwood Road, which are already under pressure and unsuitable for significant increases in volume. These roads lack basic infrastructure such as footpaths and lighting, posing safety risks and contributing to congestion and reduced air quality. It is evident that without the completion of the whole of the CWMMC that its omission will only seek to cause an unacceptable impact on the residual cumulative impacts on the road network which would be severe.
- 3.94 A review of the applicant's own Transport Assessment, particularly Appendix E paragraphs 1.73 and 1.74, raises serious doubts as to whether the supposed transport

benefits of the scheme can realistically outweigh the very significant harm it will cause. The language used in these sections is notably cautious, acknowledging that there remain fundamental uncertainties over the ability of the proposed CWMMC to deliver meaningful mitigation. Indeed, the phrasing suggests that even the applicant recognises that the scale of the development and its associated traffic impacts may be inappropriate in this location. This undermines the credibility of the applicant's case and strongly supports the conclusion that the proposal is not only unsustainable in transport terms but potentially unjustifiable altogether.

- 3.95 Reliance on this limited and fragmented arrangement is wholly inadequate to serve a development of approximately 3,000 dwellings and associated uses (including employment land, schools and community facilities). The Charlwood Road / Ifield Avenue junction would become a critical bottleneck, while the “hidden” Rusper Road connection would channel traffic into the rural road network, creating significant highway safety and capacity issues for Rusper, Lambs Green, Faygate and Newdigate. This fragmented strategy fails to provide a coherent, resilient access solution for a development of strategic scale.
- 3.96 The traffic impacts on surrounding settlements are therefore likely to be profound. Ifield Green would experience re-routing and rat-running as vehicles attempt to avoid congestion at the Charlwood Road junction. Charlwood Road would provide a direct route north-east towards London via Charlwood and rural villages. The third Rusper Road exit would encourage back routes via Rusper and Faygate to the A264, or via Newdigate to the A24 at Beare Green. These patterns would spread significant levels of development traffic across small rural settlements and unsuitable roads, with cumulative impacts on highway safety, residential amenity and the character of the countryside. Development of the site would create unnecessary pressures on the highway network contrary to paragraphs 109 and 117 of the Framework.
- 3.97 A further concern relates to the proposed car parking provision, which appears unrealistically low for a development of this scale and character. The Transport Assessment assumes car ownership levels significantly below those typically experienced in comparable suburban locations. In practice, new residents are likely to own more vehicles per household than the scheme allows for, leading to overspill parking on surrounding streets and within internal access roads. Insufficient on-plot and visitor parking provision would therefore contribute to congestion, unsafe parking

practices, and conflict between vehicles, pedestrians, and cyclists contrary to the principles of good design and the requirements of HDPF Policies 39 and 40, as well as the sustainable transport objectives of the NPPF.

- 3.98 Traffic modelling indicates that the surrounding road network is already at or near capacity, and the development would be contrary to national planning guidance and local policies (HDPF Policies 2, 39 and 40). Without substantial upgrades to the road network and a more comprehensive transport strategy, the development risks undermining both local mobility and environmental quality.

Public transport

- 3.99 Ifield train Station is some 1.8km from the development, whilst Faygate Station is over 5km away. Both stations only have 2 trains per hour in the weekday peaks, per direction. Ifield Station has no parking, passenger drop off and the nearest bus stop is 130m from the station.
- 3.100 Whilst the periphery of the site is within walking distance of bus stops and the train station, the walking distances to the nearest bus stops and train stations from anywhere within the proposed development, is substantially further than is considered reasonable to attract public transport users and consider the site sustainable, a test within both NPPF and Local Plan Policies.

Bus

- 3.101 Whilst the proposal suggests that bus provision will be increased connecting the site to Crawley, the bus route will be along the rural roads. It is unreasonable for an increase in bus services to use these roads without inflicting harm on the safety of the highway.
- 3.102 Overall, the quality of public transport provision is insufficient to support sustainable development. The walking distances from much of the site to the nearest bus stops and train stations exceed what is typically considered reasonable, thereby limiting the likelihood of future residents choosing public transport over private car use. This undermines the sustainability credentials of the proposal, contrary to the principles set out in both the NPPF and relevant Local Plan policies.

3.103 Furthermore, although the proposal suggests an increase in bus services to connect the site with Crawley, the reliance on narrow rural roads raises significant concerns regarding highway safety. Without substantial infrastructure improvements, it would be unreasonable to expect enhanced bus provision to operate safely and effectively in this location.

Cycling

3.104 Whilst the proposed masterplan outlines a number of cycle routes connecting the site to the existing urban area, several of the proposed routes are disconnected from the built-up boundary, and the red line boundary.

3.105 For cycling to serve as a viable and safe alternative to car use, it is essential that the proposed cycle network provides secure and direct access to key trip attractors in Crawley, such as Ifield Station, the Town Centre, K2 Leisure Centre, The Hawth, Manor Royal, and Gatwick Airport. While Homes England has indicated plans for active travel routes, these have not been comprehensively or adequately integrated into the development proposal, particularly concerning connections into Crawley. Several of the proposed routes pass through the areas restricted by flood plains and would be unlikely to be attractive and safe during the early morning and evening hours.

3.106 Furthermore, there is no clear commitment to funding these routes or their extensions, nor is there a defined timeline for their delivery. References to Community Infrastructure Levy (CIL) and Section 106 agreements are made, however, neither mechanism guarantees sufficient funding nor provides assurance on the timely implementation of these essential infrastructure elements.

3.107 Additionally, the proposed Bonnetts Lane junction does not include a cycle route connection to the existing Ifield Avenue cycle route, which currently terminates at the Rugby Club. This oversight further undermines the development's commitment to promoting sustainable transport options.

3.108 The current proposal lacks a comprehensive and adequately funded plan for safe and attractive cycle routes, which are essential for the development's sustainability and integration with the wider transportation network. It is also important to highlight that the Crawley Active Travel Forum has identified the need for a dedicated cycle route connection linking Kilnwood Vale (at the north-eastern corner of the site) into Ifield West, with onward integration into the wider West of Ifield routes. This connection is

critical to delivering a coherent and continuous active travel network. However, the current proposals fail to secure or commit to this strategic link. Without it, the scheme risks reinforcing severance rather than improving connectivity, contrary to local and national policy objectives to promote safe and sustainable cycling infrastructure.

- 3.109 These factors collectively suggest that the site is not well-served by public transport as well as active travel routes and fails to meet the necessary tests of accessibility and sustainability.

Flood Risk and Drainage

- 3.110 The proposed development raises significant concerns regarding the existing wastewater infrastructure in Ifield, particularly the capacity of the Crawley Sewage Treatment Works managed by Thames Water. According to the *Water Cycle Study Crawley Addendum Report* (January 2021), the flow permit for the Crawley Wastewater Treatment Works is projected to be exceeded between 2025 and 2030. Thames Water has confirmed that the facility is already nearing its treatment capacity and will breach its permit limits during the Local Plan period unless proactive measures are taken. Approving this development without addressing these issues risks overwhelming the infrastructure and increasing the frequency of sewage spills into the River Mole.
- 3.111 The existing wastewater infrastructure is already under strain and must be upgraded before any additional pressure is introduced. Planning, designing, securing approvals, and constructing a new or improved treatment facility could take several years. Therefore, infrastructure upgrades should be prioritised and implemented before any planning permission is granted for this site. The proposed development at this stage is considered premature given the significant infrastructure which is required to support and enable the development.
- 3.112 It is concerning that Thames Water has publicly acknowledged the treatment works is at capacity, yet the planning submission offers little reassurance or detail regarding a viable solution. The accompanying drainage statement notes that Thames Water is conducting modelling assessments to explore upgrade options, following earlier pre-application discussions. However, there is currently no confirmation that a resolution has been identified or agreed upon.
- 3.113 After reviewing the Utilities Assessment submitted in support of the application, as well as the Environmental Statement, a significant issue has emerged with sewage treatment capacity. There is a known sewerage problem within the area of Ifield, and the application appears to have failed to address this constraint.
- 3.114 As a result of this, there are three key issues that form a strong basis for objecting to this application:

- Failure to address a known constraint in the Environmental Statement – The omission of sewage treatment capacity is an issue, particularly given the long-standing concerns with Thames Water and the clear environmental risk. This could be a breach of the EIA Regulations.
- Failure to provide mitigation – Where a significant risk is known, the ES and application should propose mitigation measures.
- Potential misrepresentation in the Environmental Statement (Chapter 14) – If the ES claims that Thames Water confirmed capacity exists when, in fact, their position was only that capacity needs to be assessed, that does look misleading. It may also have legal implications if it is found that the applicant has materially misrepresented consultation responses.

3.115 In light of the known capacity constraints and the absence of a confirmed infrastructure solution, the proposed development should not proceed until the wastewater treatment issues are fully resolved. Failure to address these concerns risks exacerbating environmental harm, undermining public health, and placing unsustainable pressure on already overstretched infrastructure. A responsible and coordinated approach is essential to ensure that development is both viable and sustainable in the long term.

3.116 It is therefore considered that the application is deficient and should be refused given the potential drainage issues that have not been addressed by Homes England.

Open Space, Recreation and Loss of Ifield Golf and Country Club

3.117 The application site currently accommodates extensive areas of open space, most notably the Ifield Golf and Country Club, alongside informal countryside, footpaths, and recreational assets. The masterplan proposes to replace these with a dense residential-led development of up to 3,000 homes, accompanied by new formal open spaces, play areas, and sports facilities. While the applicant highlights the inclusion of new “high-quality open space typologies” as a public benefit, this presentation masks the permanent loss of an established and valued recreational facility and the erosion of the area’s existing open, rural character.

3.118 The Ifield Golf and Country Club currently provides a significant recreational resource for Crawley and Horsham residents. Its loss has been identified as problematic in the Golf Needs Assessment element of the GCA, which concludes there is already a quantitative under-provision of golf facilities in the local area. The permanent closure

and redevelopment of this facility would therefore worsen an existing shortfall, removing opportunities for accessible sport and recreation and running directly counter to the NPPF (Paragraphs 103 and 104), which seek to protect open space, sports, and recreational buildings and land unless an assessment clearly shows they are surplus to requirements. No such robust evidence has been provided here.

3.119 The new open space and play space proposed as part of the masterplan do not mitigate this loss. They are intended primarily to meet the recreational and amenity needs of the thousands of new residents generated by the scheme itself, rather than providing a net gain for the wider community. In reality, existing residents will lose access to a unique and established multi-functional landscape that combines leisure, recreation, and open countryside character. Its replacement with fragmented pockets of estate-based open space cannot replicate the character, scale, or function of the existing facility.

3.120 HDPF Policy 43 (Community Facilities, Leisure and Recreation) is clear that the loss of existing community, cultural, and recreational facilities will not be permitted unless it can be demonstrated that:

- An alternative facility of equal or better quality and accessibility will be provided; or
- Evidence shows that the facility is no longer needed.

3.121 Neither test is met here. The applicant does not propose a replacement golf course or comparable leisure facility, nor has it demonstrated that Ifield Golf and Country Club is surplus to requirements. On the contrary, the Golf Needs Assessment shows a quantitative under-provision of golf facilities in the local area. As such, the loss of the Club conflicts directly with Policy 43.

3.122 In summary, the scheme would result in the net loss of an important recreational facility and the degradation of existing open space value, contrary to the evidence of need identified in the Golf Needs Assessment, the requirements of the NPPF (Paragraphs 103 and 104), and Policy 43 of the Horsham District Planning Framework. This represents a significant social and environmental harm that cannot be offset by the proposed new open space, which is largely mitigation for the demands of the new community rather than a genuine benefit.

4. Planning Balance

- 4.1 The NPPF clearly states that where there are no relevant development plan policies, or where the most important policies for determining the application are considered out-of-date, planning permission should be granted unless the adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole (paragraph 11d).
- 4.2 As a result of the Council being unable to demonstrate a sufficient housing land supply, the 'tilted balance' outlined in paragraph 11d of the NPPF is engaged. This means that planning permission should be granted unless the adverse impacts would significantly and demonstrably outweigh the benefits when considered against the NPPF policies as a whole.
- 4.3 The NPPF sets out at paragraph 8 that there are three overarching objectives to sustainable development that should be pursued in mutually supportive ways; these are economic, social and environmental objectives. In considering whether the proposed development constitutes sustainable development, how the development performs against the objectives and policies of the NPPF as a whole should be considered.
- 4.4 In weighing the planning balance, the proposed development is considered to be in direct conflict with the spatial strategy of the Horsham District Planning Framework (HDPF), primarily due to its scale, unsustainable location, and the resulting adverse impacts on the local highway network. The scheme would also cause unacceptable harm to the landscape character and ecological value of the site and exacerbate existing deficiencies in foul water infrastructure. These harms are compounded by limited accessibility to public transport and concerns over highway safety, particularly in relation to proposed bus service enhancements along unsuitable rural roads.
- 4.5 The applicant has identified a range of public benefits arising from the scheme, including the delivery of up to 3,000 new homes, policy-compliant affordable housing, new schools, employment opportunities, open space and biodiversity net gain, social infrastructure and transport measures. These benefits are recognised. In particular,

the delivery of market and affordable housing carries weight given Horsham District's acknowledged housing supply deficit.

- 4.6 However, the claimed benefits must be carefully scrutinised in the context of the proposal's scale, location and policy conflict. The housing benefit is undermined by the fact that delivery would not occur for several years, with phasing spread across a long trajectory, meaning it cannot resolve the district's immediate shortfall. Furthermore, the proper way to identify and allocate a strategic site of this magnitude is through the Local Plan process, which has yet to be concluded. To approve such a development now would predetermine spatial strategy and undermine plan-making, contrary to national policy.
- 4.7 While the provision of new schools and social infrastructure is welcome, these are principally mitigation measures required to make the development acceptable in planning terms, rather than genuine wider public benefits. They mainly address the demand created by the new community itself and cannot be considered substantial benefits beyond the site. However, it is recognised that the proposed social infrastructure will contribute towards meeting the demand generated by the wider community and so this benefit must be considered.
- 4.8 The provision of open space and biodiversity net gain is again mitigation to offset the significant environmental harm caused by the urbanisation of a large area of countryside. The delivery of 10% biodiversity net gain on site does not outweigh the permanent loss of existing countryside character, open fields, and the settlement gap which currently provides separation and identity to Ifield. The claimed biodiversity enhancements are relatively modest when considered against the scale of habitat loss.
- 4.9 The proposed package of transport measures does not overcome the fundamental concern that the scheme would generate severe residual impacts on the local highway network, contrary to NPPF paragraph 116 (December 2024). Improvements to Ifield Station and encouragement of active travel are insufficient to mitigate the scale of additional traffic movements, which would overwhelm existing rural and suburban road infrastructure and negatively impact surrounding communities.
- 4.10 Weighing these matters in the round, it is considered that the harms of the proposal are very substantial. These include:

- The significant loss of countryside and erosion of landscape character (contrary to HDPF Policies 25 and 26, and NPPF Chapter 15);
- The coalescence of Crawley with surrounding settlements, undermining their separate identities (Policy 27);
- The premature determination of strategic development in advance of the Local Plan process (NPPF paragraphs 50–51);
- Severe highways and transport impacts. The scheme will significantly increase traffic flow and does not encourage the use of sustainable modes of transport in a suitable way (NPPF paragraph 116 and Policy 40);
- Significant drainage constraints and the potential increase of an existing sewage problem (Policies 38 and 39);
- The character and setting of numerous heritage assets will be significantly impacted. The potential harm to these assets conflicts with the NPPF as well as Policy 34.
- The permanent loss of Ifield Golf and Country Club even when there is a quantitative under-provision (Policy 43)
- The irreversible impact to and the loss of high-quality ecological habitats. A number of key species will be harmed as a result of this development (Policy 24); and
- Conflict with the adopted spatial strategy of the HDPF (Policies 2, 3 and 4).

4.11 As demonstrated above, this proposal cannot be considered to be sustainable in accordance with NPPF paragraph 8. It is considered that the proposed development would create positive economic benefits, and positive social benefits. However, adverse material considerations have been highlighted that would outweigh the presumption in favour of sustainable development arising from the proposed scheme. The benefits are clearly and demonstrably outweighed by the potential harm.

4.12 While the development would deliver certain benefits, including the provision of new housing potentially contributing to local housing supply, some economic uplift during the construction phase, and the provision of local facilities, these benefits are not considered sufficient to outweigh the significant and demonstrable harms identified. Under paragraph 11(d)(ii) of the National Planning Policy Framework (NPPF), and when assessed against the Framework policies taken as a whole, particularly those relating to sustainable development, effective land use, design quality, and

infrastructure provision, the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. Accordingly, the proposal does not constitute sustainable development and planning permission should be refused.

5. Conclusion

- 5.1 This report assesses and objects to a hybrid planning application (Ref: DC/25/1312) for the development of up to 3,000 dwellings at the west of Ifield, Crawley. The application was submitted to Horsham District Council and was subsequently validated during August 2025.
- 5.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (PCPA) and Section 70(2) of the Town and Country Planning Act 1990, planning applications must be determined in line with the development plan, unless there are material considerations that suggest otherwise.
- 5.3 It is Homes England's (the applicant) case that paragraph 11d of the NPPF applies, as the policies most important for determining this planning application are out-of-date, and the Council is unfortunately unable to demonstrate a five-year housing land supply.
- 5.4 The planning balance has been set in the context of paragraph 11d of the NPPF and must be considered as a part of the decision-making process. This is set in the context that the approach to deciding on this application is to approve development unless there is significant and demonstrable harm to outweigh the benefits of the proposed development. This is on the basis that the local policies most important for determining planning applications are 'out of date' therefore engaging NPPF paragraph 11d and the tilted balance.
- 5.5 The proposed development of up to 3,000 dwellings west of Ifield represents an unprecedented scale of growth in an unplanned and unsustainable location. Far from being a proportionate and natural extension to Crawley, the scheme would urbanise a large swathe of open countryside, erode the rural setting of Ifield, and significantly diminish the separation between Crawley and neighbouring villages. The character and identity of this part of Horsham District would be permanently altered, contrary to Strategic Policies 26 (Countryside Protection) and 27 (Settlement Coalescence) of the Horsham District Planning Framework.
- 5.6 In transport terms, the site is constrained and poorly connected to Crawley, with floodplains and unsuitable access points limiting safe and direct walking and cycling

connections. The development would therefore operate as a disconnected enclave, heavily reliant on private car use. The evidence does not demonstrate that the local road network can accommodate the scale of additional traffic created for social and economic matters, raising a clear risk of severe residual impacts contrary to Policy 40 of the HDPF and Paragraph 115 of the NPPF.

- 5.7 The application is also fundamentally premature. At this scale, it would predetermine strategic decisions about the distribution of housing growth in Horsham District at a time when the Local Plan Review has been paused and found unsound. Granting permission now would prejudice the outcome of the proper plan-making process, contrary to the guidance in Paragraphs 50 and 51 of the NPPF.
- 5.8 Whilst the applicant identifies benefits including housing, affordable provision, new schools, and open space, many of these represent mitigation for the impacts of the scheme itself rather than genuine public gains. When assessed in the planning balance, the benefits are significantly and demonstrably outweighed by the adverse impacts on the countryside, nationally and locally designated heritage assets, settlement pattern, landscape character, drainage, ecology and transport network. Additionally, weight is also attributed to the severe conflict with the relevant Development Plan policies. In accordance with NPPF paragraph 11d, the presumption in favour of sustainable development does not apply.
- 5.9 There are significant material considerations which indicate that the development should not be granted planning permission. It is submitted that the proposed development represents harmful design that would cause irreversible harm to the landscape and constitutes unsustainable development when assessed against the policies in the NPPF taken as a whole. As the proposed development does not accord with national policy, it is respectfully requested that the application is refused at the Council's earliest opportunity.

Appendix 1 – APP/Z3825/W/24/3350094: Appeal Decision



Appeal Decision

Hearing held on 25 & 26 March 2025 and (online) 19 May 2025

Site visits made on 25 & 26 March 2025

by H Nicholls MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 13th June 2025

Appeal Ref: APP/Z3825/W/24/3350094

Land to the West of Storrington Road, Thakeham

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Bellway Homes Ltd (Strategic Land) against the decision of Horsham District Council.
 - The application Ref is DC/24/0021.
 - The development proposed is demolition of existing buildings and the phased redevelopment of the site as a residential led development comprising 247 dwellings and flexible non-residential floorspace (Use Class E), with works to public right of way and associated landscaping, open space and infrastructure.
-

Decision

1. The appeal is dismissed.

Applications for costs

2. Costs applications were made by the parties against one another. These applications are subject of separate decisions.

Preliminary Matters

3. The signed *Highways Statement of Common Ground* (Highways SoCG) and *Statement of Common Ground 1 – General Matters* (SoCG), received on 21 March 2025, clarified the remaining areas of dispute between the main parties. Following the submission of information with the appeal, the main parties agreed¹ that the second reason for refusal was no longer relevant and the Council did not seek to defend it.
4. Through its *Addendum Statement of Case* (Addendum SoC), the appellant highlighted that an update to the National Planning Policy Framework (the Framework) in December 2024 (paragraph 175) and changes to the Environment Agency's Flood maps in January 2025 necessitated the submission of a sequential test. The *Flood Risk Sequential Test Report*², Addendum SoC and other Hearing Documents³ were consulted upon following the adjournment of the hearing on 26 March 2025. The Council and interested parties were invited to comment on the additional evidence so as to avoid prejudice.

¹ As per the Highways SoCG

² Hearing document 1

³ Hearing documents numbered 2 – 5 inclusive

5. A draft version of a unilateral undertaking (UU) was received on 12 March 2025. A further alternative draft was received on the 24 March 2025 and was discussed at the hearing. A completed UU, dated 7 April 2025, was submitted. The Council and West Sussex County Council (County Council) also provided Community Infrastructure Levy (CIL) Compliance Statements in respect of the various obligations. Insofar as the UU secures a 35% provision of affordable housing and infrastructure contributions in relation to the second reason for refusal, these aspects fell away. I consider the other sustainable transport related obligations within the UU further below.

Main Issues

6. The main issues in the appeal are:
- whether the scale and location of the proposal accord with the development plan;
 - whether the proposal would be sustainably located in relation to facilities and services to minimise the reliance of future residents on private vehicles; and
 - whether the proposed development would be in a suitable location with regard to flood risk.

Reasons

Context of site and settlement

7. The appeal site was previously used as a mushroom growing and processing business which closed at some point in 2022. It comprises around 15 hectares of land, including some open areas to the north, and many largescale buildings in the southern and central portion of the site. Existing dwellings forming part of Thakeham/Abingworth adjoin the southern parts of the appeal site.
8. The appeal proposal seeks to construct 247 dwellings in place of the existing buildings, including 86 affordable homes (35%). A local centre, incorporating flexible Class E uses, would also be constructed in the centre of the site. The main public open space areas, including an orchard and community park, would be located around the periphery of the site.
9. Thakeham (The Street) is an older, smaller part of the settlement to the north and other than a modest number of dwellings, accommodates a church and public house. The settlement of Thakeham/Abingworth is separated from Thakeham (The Street) by a section of Storrington Road which exists within a cutting and which is relatively narrow with high banks either side. There is no footway along the carriageway edge, though a public right of way (PROW) connects the two parts of the settlement.
10. Whereas much of the settlement previously centred around Storrington Road, Thakeham/Abingworth has materially expanded over recent years. Abingworth Meadows was developed on the site of a former nursery as part of an enabling development linked to the former mushroom business on the appeal site and extended the settlement by around a further 200 dwellings in an easterly direction.
11. As part of the Abingworth Meadows development, a number of other areas of open space, a village hall and café have been developed. The cafe also hosts a small area for general top-up shopping purposes which is available during its opening

hours, broadly during the working day on weekdays and part of the day on Saturdays.

12. There are sports pitches within Thakeham/Abingworth which host a number of club activities. Allotment gardens are also yet to be constructed. There is also a small animal vet practice operating from a unit adjacent to the café. A pre-school building sits to the south of the Abingworth Meadows development but has not operated recently and whether it will reopen is as yet, uncertain. Workshops which were proposed within the Abingworth Meadows development have not yet been developed due to a lack of demand and exploration of potential alternative uses are currently ongoing.
13. To the south and around 1.3 km away is the separate small town/large village of Storrington. The north-eastern area of Storrington contains 'Thakeham School' and an adjoining secondary school. On leaving Thakeham/Abingworth and heading in a southerly direction, the road descends and winds through a cutting which allows for two-way traffic but is absent of footways. The footway resumes around halfway between the outer edges of Thakeham/Abingworth and Storrington.
14. In a wider context, West Chiltington and West Chiltington Common are separated from the appeal site by fields, over which passes a PROW. The alternative routes by rural roads to West Chiltington/Common are in excess of around 2km. The key settlement of Horsham is in the region of 16 km to the north.

Scale and location

15. In policy terms, the development plan currently includes the Horsham District Planning Framework (adopted 2015) (HDPF) and the Thakeham Neighbourhood Plan (TNP) (adopted 2017).
16. Policy 2 of the HDPF seeks to focus development around the key settlement of Horsham and allows for growth in the rest of the district in accordance with the identified settlement hierarchy through an appropriate scale of development which retains the existing settlement pattern.
17. Policy 3 of the HDPF states that development will be permitted within towns and villages which have defined built-up areas. The policy places the combined settlement of Storrington and Sullington within the category known as 'small towns and larger villages' which are settlements with a good range of facilities and services, strong community networks and employment provision, together with reasonable rail and bus services. These settlements are known to act as hubs for smaller villages to meet their daily needs but also have some reliance on larger settlements. West Chiltington Village and Common are classified as a medium village which have a moderate level of facilities and community networks along with some access to public transport, providing some services but leaving some degree of reliance on small market towns and larger villages for a number of requirements.
18. Under Policy 3 of the HDPF, Thakeham (The Street and High Bar Lane (Abingworth)) is collectively classified as a smaller village. The listing of these two separate areas of the village highlights their physical separateness. In general, smaller villages are listed in the Policy as having *"limited services, facilities, social networks but with good accessibility to larger settlements (e.g. road or rail) or settlements with some employment but limited services and facilities or*

accessibility". It is highlighted that residents are reliant on larger settlements for most of their requirements.

19. Policy 4 of the HDPF states that the expansion of settlements will be supported where sites are allocated either within a Local or Neighbourhood Plan and adjoins an existing settlement edge; the level of expansion is appropriate to the scale and function of the settlement type; is demonstrated to meet the identified local housing needs or will assist in the retention and enhancement of community facilities and services; and where its impact would not prejudice comprehensive long-term development.
20. Policy 26 seeks to resist development outside of built up area boundaries (BUABs) other than where it is essential to its countryside location and to meet either the needs of agriculture or forestry, mineral or waste extraction, quiet recreational uses or for some other reason to enable sustainable rural development.
21. The site falls outside of the defined BUAB of Thakeham (The Street/High Bar Lane/Abingworth) and is therefore in the countryside in policy terms. Hereafter, unless where specified, I refer to all areas of the settlement taken collectively as Thakeham.
22. Policy 3 of the TNP covers the appeal site and areas of land to the east and south. Policy 3 of the TNP states that provided that all reasonable efforts have been made to secure an agricultural and horticultural use of the site, the 'Mushroom Site' could be used for one or more of either a recreational use compatible with the countryside location; a solar array use; a light industrial/commercial use and/or tourism use within the existing developed area of the site with the remainder returned to an open agricultural use.
23. In October 2022, the Council published the Facilitating Appropriate Development advice note (FAD) in order to respond to the acknowledged shortfall in housing land supply and to assist in the assessment of proposals outside of BUABs. The FAD enshrines positive support for proposals outside of BUABs where they meet the following criteria:
 - *The site adjoins the existing settlement edge as defined by the BUAB;*
 - *The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;*
 - *The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;*
 - *The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and*
 - *The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.*
24. The FAD did not seek to change the categorisation of settlements as set out in HDPF Policies 3 and 4.
25. The Council prepared evidence in support of the production of its emerging *Horsham Local Plan 2023 - 2040* (eLP). This includes the *Settlement Sustainability Assessments*, one from December 2022 and an updated version from July 2024⁴.

⁴ Local Plan Review – Background Paper - Settlement Sustainability Assessment 2019-2022

Both Assessments note that the level of services and facilities has increased in Thakeham with the recent development of Abingworth Meadows but that the reliance on larger settlements still persists. They note that additional development would generate an increase in unsustainable travel patterns and that an improved bus service would be beneficial. Both versions of the Assessment incorrectly identify the existence of a limited employment provision at Thakeham Mushrooms; which given its closure also means that more out commuting from the village occurs than was previously the case. Overall, there is limited differences in the commentary on the village facilities and services but the 2022 Assessment indicates that the scale and function of the village is 'medium' and the more recent 2024 Assessment indicates that the village should be regarded as small.

26. A key point of contention with the proposal is whether the level of expansion proposed is appropriate to the scale and function of Thakeham.
27. In terms of scale considered numerically, the TNP uses the 2011 Census data for the population and numbers of dwellings within the wider parish. The appellant's evidence focusses on the area more specifically around Thakeham and notes that in the 2021 Census, 585 dwellings were recorded, up 139 dwellings since the 2011 Census. This number excludes the 75 dwellings which have since been completed from Phase 3 of Abingworth Meadows. The Council's evidence on dwelling and population numbers seeks to exclude the addresses within the south of Thakeham parish which are effectively located on the edge of Storrington and functionally linked thereto. I adopt this logical approach. The appellant seeks the inclusion of the dwellings within The Street as part of Thakeham in numerical terms, which is also logical. On the basis of combining the two approaches and including the recently completed dwellings in Phase 3 of Abingworth Meadows, the current baseline figure for numbers of dwellings in Thakeham is around 550 dwellings. A further 53 dwellings⁵ (of 65 allocated under the TNP) are also planned for the settlement. Relative to this baseline figure and as is clearly apparent from visiting the village, 257 dwellings would be a very significant increase in scale, particularly in the context of the scale of expansion that the village has already undergone in recent years.
28. The appellant's various assessments⁶ point out that some additional facilities exist now that did not exist before the Abingworth Meadows development. However, a removal of employment opportunities (through the closure of Thakeham Mushrooms), closure of the preschool and uncertainty about workshops previously approved in the Abingworth Meadows scheme further detract from the village's ability to sustain its residents without the need to travel to higher functioning settlements by private vehicle. Furthermore, the categorisation of Thakeham as a small village which is said to have 'good' connectivity to larger settlements, such as West Chiltington/Common and Storrington, obscures the reality that the current connectivity is almost exclusively through residents using private vehicles given the very limited bus service and poor walking and cycling routes; a point to which I return below.
29. The proposal includes a Local Centre on the ground floor of Block A which would allow for a retail unit and/or a small number of units of varied uses to be delivered

⁵ Including 25 dwellings approved under HDC Ref. DC/20/2577 and 28 dwellings under consideration under HDC Ref. DC/23/2146

⁶ as per the *Former Mushroom Farm Site Facilitating Appropriate Development in Thakeham* (Lichfields FAD), the related *Hearing Statement Addendum Input* and further explained at the hearing

in a position visible from Storrington Road. A related letter from Rapleys⁷ indicates that the 2021 Census data population of 2,380 individuals is unlikely to generate sufficiently strong or consistent market demand for a convenience store to be viable, but with the appeal proposal, recently completed Phase 3 development and other planned developments, with potential for an initial rent-free period, a convenience store operator would be more attracted to a unit of the size proposed.

30. The Parish-wide population data of 2021 cited in the Rapleys' letter exceeds that relied upon for the population of Thakeham from the Lichfields FAD of 1,467 people. If applying a 2.4 average occupancy increase to the dwellings recently completed in Thakeham and those that are committed and planned by the proposal, a population of 2,380 individuals would still not be achieved and would fall further short of the number expected to attract a convenience store operator. The lack of demand for retail and or similar non-residential floorspace is a reoccurring theme from earlier consents at Abingworth Meadows which has been brought to my attention. These factors suggest that whilst the proposed local centre would be located more favourably than that previously planned and provided in Abingworth Meadows, and despite obligations on the appellant to actively pursue such through the UU, the delivery of this aspect as a means to enhance the sustainability of Thakeham would be uncertain at best.
31. The relative scale and functionality of Thakeham has been compared to other villages like Cowfold and Slinfold in the appellant's evidence. The existing convenience retail provision in at least Cowfold is one notable difference between it and Thakeham. However, the limited detail on the existence, or otherwise, of useable public transport connections or connectivity to larger settlements renders it difficult to make a meaningful analysis about the options available to residents in those other small villages.
32. Another aspect of the appellant's evidence is the extent to which villages contain previously developed land (PDL). Though there are some villages in Horsham that may have large areas of PDL, this has not materially influenced the settlement hierarchy. However, in my view, it does not undermine the policy and evidence base conclusions specifically on settlement scale and functionality and would not preclude the reuse of PDL forming a material consideration where relevant.
33. I have also considered the appellant's suggestion that the scale of Thakeham with the proposal and other planned developments, at around 800 – 900 dwellings should be considered appropriate when compared to other villages that fall into the small village categories. I have also approached the assessment on the more holistic basis being encouraged, however, taking account of the evidence, I consider that the proposal would not be appropriate by virtue of being grossly out of scale with the settlement of Thakeham and its limited existing functionality. The proposed means of altering the function of the settlement are not certain to succeed and do not alter my view in this regard.
34. Accordingly, the proposal entirely conflicts with Policies 2, 3, 4 and 26 of the HDPF and Policy 3 of the TNP. For the reasons outlined above, the proposal would also fail to accord with the guidance in the FAD.

⁷ Hearing Document 2

Sustainability

35. In respect of sustainable travel, the aspirations for the HDPF are expressed in Policy 40 which supports developments that promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities and, in particular, where they are appropriate and in scale to the existing transport infrastructure, including public transport. Policy 40 also seeks for development to be located in areas where there are or will be a choice in the modes of transport available, and minimises the distance people need to travel and conflicts between traffic, cyclists and pedestrians. The Policy also seeks to deliver better bus and rail services in partnership with operators and increasing opportunities for interchange between the public transport network and all other modes of transport.
36. The introduction to the TNP indicates that despite the building of some housing estates in the 20th century in the south and centre of the village, Thakeham's access to many employment opportunities remains by car, with the network of sunken lanes making walking and cycling difficult. Within the settlement itself, and as agreed in the Highways SoCG, people can walk to the café/shop, open spaces and village hall. A slightly longer but relatively safe walk can be made to the public house and church on The Street via a tarmacadam PROW. The bus stops are also conveniently located on Storrington Road in the village centre.
37. Storrington Road has some sections through the cuttings both to the north and south which are narrow, constrained and, in my view, difficult enough to navigate with due care and attention even in a typical vehicle. Whilst there is no prohibition on cyclists using the road and even assuming that the surface condition could be improved at the outer edges of the carriageways, there is no prospect of them being widened to assist with the perception of protection from vehicles to encourage a greater uptake of purposeful journeys to local destinations. As such, the option to cycle even to Storrington within the carriageway is likely to remain one for experienced cyclists only. Taking an alternative road route via West Chiltington presents some similarly challenging sections and a longer route overall which seems similarly unlikely as a regular commuting option. For similar reasons to that outlined above, the opportunity to walk the most direct route to Storrington along the carriageway edge is unsafe and has limited prospects of being made meaningfully safer.
38. There is a PROW which connects Thakeham with West Chiltington (and West Chiltington Common). There are also PROWs and bridleways that also connect with Storrington Road near the Kingdom Hall from where continuous footways resume towards Storrington centre. A number of improvements are proposed by the appellant to upgrade many of these routes, including⁸ upgrading some PROWs to bridleways which allows for cyclists, pedestrians and horses and riders to use them. Some upgrades to all-weather surfaces are proposed, in addition to signage improvements as part of a package of improvement works extending out from Thakeham.
39. However, even assuming no impediment to delivery of any part of the package of improvement works and related signage, my view is that a limited number of journeys would be made using these routes on foot or bicycle for purposeful

⁸ Bridleway 2483, Footpath 2405 and Footpath 2448

journeys to work, to shops, leisure destinations or to school. The reasons for the lack of take up would be due to a combination of the journey times along lengthier, indirect routes; undulations along the routes which present a difficulty for some users; the absence of street lighting; and related safety concerns due to their largely rural contexts. In short, in my view, whilst a beneficial package of improvements, they would serve more readily as enhancements to the recreational offer for Thakeham residents rather than offering a genuine choice of useable sustainable travel options to minimise reliance on private vehicles.

40. In terms of bus travel, there are two bus stops within Thakeham, one on each side of Storrington Road. Presently, there is only one service a day operating in each direction. The appellant's evidence⁹ indicates that at present, even the Monday to Friday peak buses to Horsham are minimally used, meaning that the TNP is correct to say that residents of Thakeham rely heavily on private vehicles to make journeys out of the village for work or other day-to-day reasons.
41. Through the UU, the proposal includes a contribution towards 'Bus Service Improvements' totalling an amount not exceeding £869,660. The terms of the UU specify that this would include at least a peak hour service to Horsham and Storrington, and three other off-peak services to both destinations. The contribution is to be paid to the 'Bus Service Operator' to fund the improvements through a 'Bus Service Contract' entered into between the Operator and Owner (developer), with the first 50% payable prior to occupation of the 25th dwelling and the balance payable prior to occupation of the 125th dwelling.
42. Looking to the supporting evidence¹⁰, the potential service improvements are listed as Option A or Option B and the maximum contribution figure in the UU is based on the implementation of the more expensive of the two options, Option A, multiplied by 5, being the number of years over which the funded period is suggested to run. However, the UU omits to specify that the service would operate over five years, or that the service improvements would be weekday only and there is no draft contract appended to the UU that clarifies the terms on which such a contribution has been based. Even though there is an opportunity for the County Council to approve the terms of the contract between the Owner and Bus Service Operator, the absence of clarity within the UU on such basic terms presents a material risk.
43. Added to the risk identified above is the arrangements for the final 50% instalment being made when the developer is ready for the occupation of the 125th dwelling, which would be beyond the control of the Bus Service Operator and for which there is limited detail of any anticipated build out projections. Furthermore, as the contract would solely be between the Owner and Operator, any contract failure on the part of the Operator would be for the Owner to seek to remedy, without any terms in the UU to ensure a continuation of service until at least the unspecified end of the term of the contract. These factors all point towards a lack of certainty that the services would even run successfully over an initially funded period.
44. Beyond the funded period of any contract, any services operating would be expected to be either commercially viable with patrons from Thakeham and users from other settlements on the route, for example Barnes Green, or subsidised in full or part by the County Council. The predicted number of bus patrons per day

⁹ Report Ref: 2206671-R13, July 2024

¹⁰ Transport Assessment Addendum – WSCC Comments, Appendix B – Ardent, July 2024

outlined in the Transport Assessment is a low figure¹¹ which was acknowledged at the hearing as not having been updated to take into account the proposed enhanced bus service. It is therefore difficult to quantify the mode shift effect of the enhanced bus service, its wider beneficial effects on changing the behaviour of existing residents, or the likelihood of the service becoming commercially viable beyond any funded period. As such, there is a lack of substantive evidence on which to base any conclusions about the commercial viability of the bus services beyond any funded period. Whilst the appellant points to the lack of evidence from the Council to support that it would not work, the opposite is also true.

45. My attention has been drawn to two appeal decisions which deal with funding towards bus services¹². In one example, the Local Highways Authority provided evidence that the service would be intended to become commercially viable beyond the initial funding period and would take the responsibility for procuring the bus service. The other example refers to evidenced forecasts that the bus services would be profitable by the end of the build out without the need for subsidy and details requirements within the relevant S106 to manage and monitor bus services, including step-in rights for the Council. Therefore, setting aside the more urban contexts of both of those examples which differ from the appeal site, the evidence and contractual terms offered in both cases appears more robust than what is before me as part of the current appeal proposal.
46. I understand that an Electric Mini Bus and electric vehicle (EV) charging point was approved in association with the Abingworth Meadows development. The appeal proposal, through the completed UU, also seeks to provide a contribution towards the provision and/or maintenance of an Electric Bus or procurement of the service of such, with the contribution to be made to an as yet, unspecified party.
47. However, It became clearer during the hearing that the proposed contribution of £90,000 proposed towards this aspect was not specifically related in scale and kind to the current proposal having, in essence, been lifted from the previous Abingworth Meadows development of a different number of houses and without the application of any indexation uplifts since that point in time, nor specifically related to the current projected costs of such. The amount of the contribution was indicated as being 'reasonable' in the view of the appellant, but what it could achieve in terms of additional capacity and private vehicle trip offsetting is unclear, particularly given that the previously approved similar service which has influenced the contribution is not yet operational, some years since it was expected to be delivered and long after the occupation of the completed development.
48. A further obligation seeks to provide an electric car club and charging infrastructure for the benefit of residents. Whilst electrifying the mode of transport would be beneficial to reduce carbon emissions, such trips would still involve the use of a vehicle rather than specifically assisting with a shift towards non-car modes of travel. The UU also offers £250 per dwelling in the form of travel vouchers to be used in accordance with the terms of a Travel Plan towards either bicycles or subsidised bus travel. In addition to service improvements and vouchers for such, there would be some improvements to the bus stops in the village, including the provision of digital bus service information boards.

¹¹ Transport Assessment, Ref 2206671-R03A, para 6.14 and table 4.2 indicate 11 additional bus trips

¹² APP/V1505/W/23/3325933 and APP/T2350/W/19/3221189

49. I have considered the appellant's point that Thakeham has been found suitably sustainable for the total 65 no. dwellings as allocated under the TNP and with related supportive comments from the Local Highway Authority that contradict the finding that the site is unsustainable for the current proposal. The approach under the HDPF is based on the scale of new development being appropriate to the transport infrastructure and choice in the modes of transport available or proposed. The scale of the proposal, at 247 dwellings, would present a significant additional number of residents with a real lack of genuine choice as to how to access everyday facilities and employment destinations both now and in the future; a point supported by the objections from Active Travel England.
50. Taking into account all of the above, the proposal would not be sustainably located to minimise the reliance of such a high number of future residents on private vehicles and would not robustly secure appropriate realistic or attractive alternative travel choices to mitigate against the serious resultant harm, contrary to the aforementioned HDPF settlement strategy policies and Policy 40 of the HDPF.

Flood Risk

51. The Flood Risk Assessment (FRA) submitted with the appeal application acknowledged that the Environment Agency (EA) online flood risk maps show nominal amounts of pluvial flooding originating from within and around the site, albeit no pluvial flows entering the site from adjacent land. The related finding was that, even in light of the acknowledged risks, the development was at a low risk of flooding from pluvial sources.
52. The evidence also suggests that the small areas of the site known to be at risk of flooding from pluvial sources are due to the very presence of the buildings and hardstandings on site, rather than any underlying geological reasons. Through the development and the implementation of a Sustainable Urban Drainage system (SUDs), these localised areas of pluvial flood risk would no longer exist. The Council did not refuse the development on the absence of proof that there were no sequentially preferable sites in flood risk terms and did not disagree with the FRA's conclusion on the level of risk of pluvial flooding given the characteristics of the site. Whilst not explicitly documented in its Officer Report or SoC, the Council indicate that the factors influencing the flood risk was applied and negated the need to refuse permission or seek further information on sequentially preferable alternatives.
53. The suggestion in the appellant's Addendum SoC is that the update to the Framework in December 2024, in addition to the updates to the EA online mapping, intensified the degree of flood risk from pluvial sources and elevated the matter to one that necessitated the submission of a sequential test. This reasoning differs from that in the *Flood Risk Sequential Test Report*¹³ (Sequential Test Report) which indicates that the need arose in light of a number of recent appeal decisions, albeit these were not provided. Nevertheless, in the interests of comprehensiveness, I do not find a reason to disagree and have considered the submitted Sequential Test Report and related evidence.
54. Having communicated its intentions as to the methodology for such with the Council in February 2025, the appellant submitted the Sequential Test Report the day prior to the opening of the hearing and an update to the same during the

¹³ Hearing document 1

hearing itself. The Council's Addendum SoC raises issues with the methodology used, specifically in relation to the alternative sites needing to identically accommodate the proposal of 247 dwellings, with a trajectory to allow completions from 2026 and to share the characteristics of having buildings and hardstandings present, i.e. not largely greenfield in nature. Having regard to the Framework, the Mead judgement¹⁴ and other proffered appeal decisions¹⁵ on this aspect, my view is that the approach taken in respect of site characteristics, the need for an identical fit and closely aligned trajectory are overly prescriptive, such that sites have been too hastily discounted from the appellant's search that may be considered sequentially preferable in flood risk terms.

55. Of those that the Council highlight in its Addendum SoC referenced from the appellant's evidence and the SHELAA¹⁶, at least one site¹⁷ could be considered sequentially preferable insofar as it has no flood risk constraints and would accommodate the development. That site has specifically been discounted because it does not share the characteristics of the appeal site in relation to the presence of buildings and hardstandings. However, in my view, this is not a robust reason to discount the site. Such an approach may lead to sites at higher risk of flooding being chosen over those at lower risk purely on the basis of the presence of built structures, which cannot always secure the most sustainable or logical outcomes.
56. The Council also consider three other sites or clusters of sites to be sequentially preferable¹⁸, though correspondingly small areas of similar risk of surface water flooding are present in each. As such, even if there are greater prospects of those sites being developed without buildings or site accesses over those areas of flood risk than when compared to the appeal site, I have taken them at face value as being equivalent to the site in flood risk terms.
57. Nonetheless, on the basis of the evidence, I find there to be at least one other sequentially preferable alternative site to the appeal site and thus, the proposal conflicts with paragraphs 170 and 175 of the Framework in flood risk terms.

Other Considerations

58. The SoCG outlined that as at an agreed base date of 1 April 2023, the Council was only able to demonstrate a 2.9 year supply of housing land against the minimum five year requirement under the Framework. The SoCG also outlines that the Council's performance against the Housing Delivery Test for the previous three years was 62%¹⁹. The Addendum SoCs of both parties cover aspects of the changes that occurred with the publication of the updated Framework in December 2024. The appellant highlights the materially increased housing requirement for the district of 1,357 dwellings per annum, plus 20% buffer using the Framework's standard method. The Council also acknowledge in its Addendum SoC that it can now only demonstrate a 1 year supply of housing land against the new requirement which means a shortfall in the order of 6,700 dwellings or more.

¹⁴ *R (Mead and Redrow) v SoS LUHC [2024] EWHC 279 (Admin)*

¹⁵ Appeal refs 3314268 and 3326187

¹⁶ Horsham District Council Strategic Housing and Economic Land Availability Assessment (SHELAA), 2018

¹⁷ Site SA-497: Land East of Hampers Lane, South of Rock Road, Storrington

¹⁸ Site SA-639: Land off Fryern Road Storrington, Site SA-520: Land at Oast House Farm, Ashington And SA-384, SA-499 & SA-469: Cluster at Rock Road/Storrington Road, Thakeham and Storrington

¹⁹ HDT results 2023, published in December 2024

59. In its Addendum SoC, the Council also indicated that progress on the eLP had halted in early 2025 and would not be likely to resume in the near future. As such, the Council state that no weight should be attached to the eLP's emerging policies.
60. Part of the reason for the acute housing land supply position and delays with the eLP stem from water supply issues in the Sussex North Water Resource Zone (WRZ), which is an area of serious water stress and which has implications for the Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites (the Protected Sites), designated under the Habitats Regulations²⁰. A strategic mitigation scheme is being developed that the Council and partner organisations hope will be implementable in the near future.
61. In light of the submitted *Water Neutrality Report*²¹ and *Shadow Habitats Regulations Assessment*²², the main parties agree that conditions could be used to ensure that the scheme would be able to offset the previous land use and/or utilise an on-site borehole. As this would avoid water being drawn from the WRZ and would not rely on the strategic mitigation scheme, the development proposed would be water neutral and would thus avoid adverse effects on the Protected Sites.
62. The appeal site and buildings were previously used for the production of mushrooms which is an agricultural operation and which is excluded from the Framework's definition of PDL. The Council has clarified an erroneous statement in its SoC that the reuse of PDL weighs in favour of the scheme, which in fact does not apply in this case. However, the site is large, has some brownfield characteristics and there would be some aesthetic enhancements from the removal of the buildings and replacement the new scheme.
63. The appellant raises the point that there would be consequences beyond the denial of the boost to housing supply if I were to dismiss the appeal. These consequences include the need to maintain costly 24/7 site surveillance to prevent antisocial behaviour, the continued dereliction of the site, the lack of potential for the site to be reused in a similar manner to its former use, and the reintroduction of a significant number of HGV movements through Thakeham in the event that a similar processing operation were able to recommence. I have taken these factors into account.
64. I have also taken account of the representations made by interested parties in support of the scheme that highlight its ability to help meet housing needs, the aesthetic improvements from replacing the existing buildings, improvements to walking routes and planting of many trees. These representations are far fewer in number than those in objection to the scheme, but that does not undermine the validity of the points raised.

Planning Balance

65. I have found that the proposed scheme would conflict with the spatial strategy of the HDPF and TNP in relation to its nature, substantial scale and poor relationship to facilities and services, particularly by sustainable modes of travel. The proposed facilities within the scheme, improvements to various PROWs, bus service improvements and associated travel plan measures could not overcome the

²⁰ As designated under the Conservation of Habitats and Species Regulations 2017, as amended

²¹ Quantum CE, February 2024

²² Aspect Ecology, February 2024

locational disadvantages of the site or materially reduce the reliance on private vehicles. I also find that there are sequentially preferable sites in flood risk terms, which is a further harm that weighs against the scheme.

66. The HDPF housing targets are now inconsistent with the standard method required by the Framework. The under delivery against the HDT and current undersupply of housing land deems these related policies out of date under the terms of the Framework in any case. The TNP is also over five years old and no longer benefits from the protection of paragraph 14 of the Framework. Accordingly, Policy 3 of the TNP attracts reduced weight, as too do the specific aspects of policies 2, 3 and 4 of the HDPF that seek to constrain development specifically in relation to BUABs, policy allocations and a rigid spatial strategy.
67. However, the Framework requires, in paragraph 110, that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, taking into account the differences between urban and rural locations. Policy 40 of the HDPF promotes this approach and therefore attracts full weight. Policies 3 and 4 of the HDPF also advocate that development should be appropriate in terms of scale and function to the settlement to which it would adjoin. These aspects are relevant to how much people need to travel and what transport modes are, or can be made available to them and are fundamental principles of sustainable development, seeking to ensure developments are of an appropriate scale, type and location. Accordingly, Policies 2, 3 and 4 of the HDPF are still capable of attracting moderate weight. Given my findings, these conflicts and the associated harms weigh substantially against the proposal.
68. There would also be a number of benefits from the scheme to balance against the harms. Clearly, the provision of 247 homes would make a significant contribution towards meeting the critical housing shortfall in the district. The site is owned by a developer already locally present that would seek to commence building homes without delay. Future policies under the eLP that may advocate a planned approach to meeting housing needs are also some way off. As such, this aspect attracts substantial weight in favour of the scheme.
69. The main parties agreed that the need for affordable housing in the district of Horsham is pressing. Of the 247 dwellings, 86 would be affordable tenures, comprising 5% would be First Homes, 25% would be shared ownership dwellings and 70% would be affordable rented dwellings. This contribution to affordable housing as a component of the scheme attracts substantial weight.
70. The scheme would deliver spaces for new flexible Class E uses which could serve a range of purposes and add to the facilities and services available to both new and existing residents. New residents, and the longer-term economic and social input to the area, would also help to support existing community infrastructure. Short-term economic benefits through the construction industry would also flow from the scheme. Collectively, I attach moderate weight to these benefits.
71. The provision of open space of a broad range of typologies and secured by way of planning obligation, would also be a benefit of the scheme that attracts moderate weight in favour of the proposal.
72. The scheme would deliver a range of upgrades to the surrounding PROW network, footways and bus stops. The combination of these measures would be

advantageous for future and existing residents of Thakeham. Future residents could also beneficially apply for travel vouchers and access an electric car club.

73. Though potentially desirable, the certainty of delivery and maintenance of the bus service improvements that could be used by the public at large is in doubt both during any period of a funded contractual arrangement and beyond any such period. Consequently, I afford very limited weight to this aspect of the scheme. Similarly, the lacking clarity on the intention for and scope of the electric bus contribution results in very limited weight being attached to this aspect of the scheme.
74. I note that the scheme would deliver a Biodiversity Net Gain in the order of at least 12% and the planting of 300 trees throughout the site. These are modest benefits of the scheme. The scheme would also be well-designed and would incorporate energy and climate change resilience measures through building fabric and fittings, which along with the aforementioned aesthetic enhancements from removal of the existing buildings, attract additional weight in favour of the scheme.
75. The appellant advances that the total Community Infrastructure Levy receipts that would be generated by the scheme would be in the order of £2.7 million. As this is intended to fund infrastructure improvements to accommodate new development in the area, it does not attract more than limited weight. For similar reasons, the avoidance of other harms is of neutral impact, neither weighing for or against the scheme.
76. The provisions of paragraph 11 d) of the Framework are engaged in this instance. The footnote 7 policies of the Framework that protect areas or assets of importance have been considered in this case. The ability to secure a bespoke water neutrality package and avoid adverse effects on the integrity of the Protected Sites does not equate to a strong reason for refusal.
77. Though there are conflicts with the flood risk objectives of the Framework, for the reasons outlined above in relation to the characteristics of the site, the nature of the risks and anticipated resolution to such through the development itself, this does not represent a strong reason for refusal under footnote 7.
78. Under Framework paragraph 11 d) ii), consideration must be given to whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the Framework policies taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. Having given due regard to these matters, in particular the need to direct development to sustainable locations, I consider that the adverse impacts of granting permission would significantly and demonstrably outweigh the totality of the benefits outlined above.
79. Taking account of the above and the other points advanced in favour of the scheme, there are no considerations of such weight that indicate that a decision should be taken other than in accordance with the development plan, when taken as a whole.

Conclusion

80. For the foregoing reasons and taking all other matters into account, the appeal should be dismissed.

H Nicholls

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Hashi Mohamed	Counsel instructed by Julian Goodban
Julian Goodban	Regional Planning Director - Bellway Homes
Madeline Anderson-Wood	Strategic Land and Planning Manager - Bellway Homes
Andrew Braun	Associate Director - Ardent
Bethan Haynes	Associate Director - Lichfields
Kieran Wheeler	Director - Savills
Robert Steele	Director – Savills
Claire Fallows	Charles Russell Speechlys LLP

FOR THE LOCAL PLANNING AUTHORITY:

Jason Hawkes	Principal Planning Officer
Adrian Smith	Majors Team Leader
Stephen Gee	Principal Planner – West Sussex County Highways
Noman Kwan	Senior Neighbourhood Planning Officer

INTERESTED PARTIES:

Andrew Brown	Clerk to Thakeham Parish Council
Philip Heims	Local resident
Alan Manton	Ward Councillor for Thakeham
Caroline Instance	Local resident
Chris Jones	Local resident

HEARING DOCUMENTS:

Document 1	Flood Risk Sequential Test Report dated March 2025
Document 2	Letter from Rapleys dated 24 March 2025
Document 3	Letter from Aspect Ecology dated 24 March 2025
Document 4	Updated draft planning obligation and accompanying plans 1 – 4
Document 5	Comparison draft planning obligations

Document 6	Motion Transport Assessment on behalf of Thakeham Parish Council (reprovided)
Document 7	Flood Risk Sequential Test Report: Update Note
Document 8	Completed UU dated 7 April 2025
Document 9	West Sussex CC response dated 24.04.25
Document 10	Email from PROW officer
Document 11	Council SOC Addendum with appendices
Document 12	Letter from Principal Ecology Consultant
Document 13	Inspectors findings on emerging Local Plan
Document 14	Representation from Chanctonbury CLT
Document 15	Representation from A Edge
Document 16	Representation from P Fung
Document 17	Representation from L Gould
Document 18	Representation from M Hall
Document 19	Representation from J Hammond-Wyatt
Document 20	Representation from K Hardman
Document 21	Representation from B Hough
Document 22	Representation from C Jenkins
Document 23	Representation from C Jones
Document 24	Representation from M Oliver
Document 25	Representation from K Shuttlewood
Document 26	Representation from U Suter
Document 27	Representation from Thakeham Parish Council
Document 28	Horsham District Council CIL Compliance Statement
Document 29	Horsham District Council Infrastructure Funding Statement
Document 30	Horsham Council CIL Charging Schedule
Document 31	West Sussex County Council CIL Compliance Statement

DOCUMENTS RECEIVED AFTER THE HEARING:

Document 32	Council's response to appellant's costs application
Document 33	Appellant's response to Council's costs application

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