

**For the Attention of Horsham District Council Planning Department**

**Re: Objection to Hybrid Planning Application DC/25/1312 – Land West of Ifield**

**From:**

[REDACTED]

Rectory Farmhouse, Ifield Street, Ifield, Crawley, West Sussex RH11 0NN

[REDACTED]

### **Executive Summary**

We write as long-term residents of Ifield (21 years), active in local community clean-ups and environmental stewardship, to **formally object** to the proposed West of Ifield development (**DC/25/1312**).

This proposal is **fundamentally unsound**, environmentally destructive, and **contrary to multiple national and local planning policies**, including key principles of the **National Planning Policy Framework (NPPF)** on biodiversity, flood risk, transport, infrastructure, and community wellbeing.

The development would irreversibly damage **critical floodplain ecosystems**, destroy valued green space, and impose **unsustainable strain on roads, healthcare, and local infrastructure**. The promise of “biodiversity net gain” and a “15-minute neighbourhood” is **misleading and unachievable** in this location.

We therefore respectfully urge Horsham District Council to **refuse** this hybrid planning application **in its entirety**.

### **1. Biodiversity Loss Disguised as ‘Net Gain’**

Homes England’s claim that this project will increase biodiversity is **scientifically and ethically indefensible**. The proposed development would build over vast sections of an existing **floodplain ecosystem**, currently home to red kites, bats, greater crested newts, tawny and screech owls, grass snakes, freshwater mussels, herons, egrets, deer, and [REDACTED] - all species dependent on intact hedgerows, dark corridors, and undisturbed wetlands.

To pave over this landscape with roads, schools, warehouses, and thousands of homes, while promising a “10% biodiversity net gain,” is **environmental greenwashing**.

The **NPPF (Paragraph 180)** makes clear that **development resulting in the loss of irreplaceable habitats should be refused unless there are wholly exceptional reasons**. This proposal does not meet that bar.

Leaving a **token narrow strip of green buffer** will not mitigate the loss. It will inevitably become **heavily used by residents and dog walkers**, driving away the very wildlife it claims to protect. The ecological damage would be **permanent and irreversible**.

## **2. Ifield Golf Club Is Not ‘Spare Land’**

Ifield Golf Club is a century-old heritage site, a vital lung for Crawley, and a social and mental health asset for over 500 members and countless local visitors. Designed by renowned architects Fred Hawtree and J.H. Taylor, it embodies both cultural and recreational value.

Destroying this facility **breaches the NPPF Clause 104**, which protects existing sports and recreation land from development unless proven surplus to requirements. Horsham’s own **Golf Supply and Demand Report (2022)** confirms local golf capacity is fully utilised. There is no “spare land” only short-sighted planning.

## **3. Flood Risk and Environmental Mismanagement**

We have personally witnessed worsening flooding at Rectory Farmhouse over the past two decades. Our garden regularly floods as the **Ifield Mill Stream** bursts its banks - a direct result of increased development upstream.

Replacing grassland and trees with tarmac and concrete will **exacerbate surface water run-off** and undermine natural flood defences. **Thames Water** has already acknowledged local sewage systems are **beyond capacity**, raising the risk of raw sewage discharges into the **River Mole**.

Under **NPPF Paragraphs 159–165**, development must avoid high-risk flood zones unless there are no reasonable alternatives. The sequential and exception tests have **not been met**. The scheme is therefore non-compliant.

#### 4. Infrastructure Deficits and False Promises

Crawley Borough Council has repeatedly expressed opposition to this scheme due to the **unmanageable strain on infrastructure** roads, schools, and healthcare.

The proposed “15-minute neighbourhood” is **wishful thinking**.

- **Ifield Station** is already dangerously overcrowded, with no realistic capacity expansion.
- **Rusper Road and Ifield Avenue** are narrow, flood-prone, and gridlocked at peak hours.
- **Construction traffic** will worsen congestion and road safety, particularly for children and cyclists.

The **NPPF (Paragraph 108)** requires that developments must ensure “safe and suitable access for all users.” This plan clearly fails that test.

The idea that most residents will walk, cycle, or use e-scooters through flooded, unlit lanes is detached from lived reality. The **Transport Assessment** relies on optimistic behavioural assumptions unsupported by data.

#### 5. Healthcare and Community Infrastructure

Local **GP surgeries are closed to new patients**, and hospitals are already overstretched.

Promises of new healthcare facilities mirror those made in the **Kilnwood Vale** development yet years later, **no surgeries have materialised**.

Without guaranteed funding, land allocation, and staffing plans, these promises are **empty planning rhetoric**.

Under the **Community Infrastructure Levy Regulations (Reg. 122)**, any planning obligation must be **necessary, directly related, and fairly and reasonably related in scale and kind**. These requirements have **not been satisfied**.

#### 6. Ignoring the Needs of an Ageing Population

The proposed development **fails to cater to the ageing population** - no care homes, no assisted living, no mobility-friendly community

infrastructure.

This omission directly contradicts **NPPF Paragraph 60**, which requires housing that meets the needs of all age groups and promotes inclusive communities.

## **7. Mental Health and the Importance of Green Spaces**

Decades of research, including studies from **Natural England (2021)** and **The Lancet (2022)**, confirm that **access to nature significantly reduces anxiety, depression, and stress.**

Green space supports cognitive function, community connection, and physical health outcomes recognised by the **NHS's Green Social Prescribing initiative.**

Destroying these green corridors for profit undercuts local mental health resilience at a time when wellbeing resources are already stretched.

**Nature is not a luxury... it is a lifeline.**

## **8. Procedural and Legal Non-Compliance**

This proposal **fails the legal Duty to Cooperate** with Crawley Borough Council, whose members have consistently objected.

It also conflicts with both **Horsham's Local Plan environmental policies** and **the strategic vision of Crawley's local plan**, breaching the principle of policy consistency in national planning law.

Any Section 106 obligations proposed to “offset” these failures lack the necessary precision, enforceability, and proportionality required by law.

## **Conclusion and Requested Action**

This proposal represents **a permanent loss of countryside character, biodiversity, and local identity.**

The claimed benefits - housing, transport, and “green” credentials - are **neither deliverable nor sustainable.**

We respectfully request that **Horsham District Council reject planning application DC/25/1312** on the grounds of:

- Environmental destruction and biodiversity loss,
- Flood risk and drainage non-compliance,
- Inadequate infrastructure,

- Breach of planning law and national policy, and
- Damage to community health, heritage, and wellbeing.

If this application is not refused outright, we request that the matter be referred to the **full planning committee**, with all supporting studies made public for **independent review**.

Thank you for acknowledging and considering our objection.

Yours faithfully,

[Redacted signature]

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[Redacted address line]