DC/25/1312 – WEST OF IFIELD APPLICATION – PART 1 RESPONSE FROM SAVE WEST OF IFIELD[1]

1. **Application DC/25/1312 regarding the Land West of Ifield should be refused** for the following reasons:
    a. **The application is premature** and lacks essential information, as has been made clear by several statutory consultees, particularly regarding transport (many aspects), impacts on the River Mole, the lack of sewage treatment capacity, and an uncertain water neutrality strategy.
    b. **It is not legally compliant**, particularly with regard to the EIA Regulation and the BNG Regulation. Significant environmental risks are not identified, the EIA scope is inadequate, and the earlier opinions of consultees have been misrepresented.
    c. **The proposed mitigations across key domains are wholly inadequate**. The mitigation for increased traffic congestion and rat-running seems to rely on extremely ambitious rates of modal shift from car-use to cycling and walking, which are not achievable not least due to the lack of connectivity to existing infrastructure outside the site. The proposed mitigations for loss of habitats, and the loss of Ifield Golf Club, are also wholly inadequate.
    d. **The baseline assessments for biodiversity, heritage (archaeological, landscape and conservation areas) and recreational (golf) assets significantly underplay their value**. As well as overplaying the effectiveness of proposed mitigations.
    e. **The harms of the West of Ifield outweigh the benefits, even if the tilted balance is engaged.** We disagree with the conduct and results of the 2021 (updated 2023) Sustainability Appraisal[2], which did not provide an adequate assessment of the sustainability of the site, or an effective comparison of all available sites.
2. We note that most of these points are echoed by official consultees in the current responses to the application.

Introduction

3. **Ahead of the discussion of the more technical areas, we would like to make some general points.**

West of Ifield is not the only site available

4. First, that consideration of this application must take into account that **there are other sustainable sites available in the District of similar size**. We appreciate that HDC is facing grossly inappropriate and unjustifiably high house-building targets, and cannot demonstrate a 5 year land supply. We also appreciate that a planning inspector would place a significant weight on the fact that the West of Ifield would deliver 3,000 houses. **But as was apparent at the draft Local Plan Examination hearings a year ago, there are at least three other sustainable sites of comparable size being promoted. HDC does have a choice.**
5. The fact that these alternative sites were not allocated in the draft Plan now carries little weight, and in any case our concerns about the allocation process still stand, in particular with regard to **the Sustainability Appraisal which we judged as inadequate** due to the lack of baseline data, a lack of updating and iteration despite the changing planning environment, too many errors and omissions, flawed and unevidenced assumptions, and over-optimism about the effectiveness of Horsham's own policies. The resulting scores were too homogeneous across the sites, with **far too much uncertainty attached across the board for the appraisal to be an adequate or effective tool for discriminating between the sites.**

Politics should not drive the decision-making around the West of Ifield

6. **The second general point is that we remain concerned that the West of Ifield is favoured primarily because it is a politically convenient choice**, away from the Horsham electorate, and on the edge of a neighbouring town, which it is claimed "has the infrastructure to support it". But there is little evidence of effective joint-working with Crawley Council. And we note that the Planning Inspector, in his 2024 examination of Horsham's draft Local

[1] Submitted on behalf of Save West of Ifield by Fenella Maitland-Smith, South Lodge, The Mount, Ifield RH110LG
[2] See Horsham District Council draft Local Plan Evidence Base, 2024

Plan, asked why the Plan's evidence base failed to address the possibility of any negative impacts on Crawley due to the West of Ifield.

7. No surprise then that Crawley Council doesn't want it, and neither do the people most affected – the residents of Ifield and Crawley – who have no democratic agency in this decision.

8. We're aware of statements made over the past few years by Horsham officers and councillors, which have had the unfortunate effect of establishing an inaccurate narrative to support their belief that the West of Ifield is inevitable. For example:

   - "*Crawley desperately needs these houses*". But Crawley needs social housing, and none seems to be planned for West of Ifield. Plus Crawley Borough Council strongly objects to the development.
   - "*Crawley already has the infrastructure to support the new residents*". Untrue – the sewage works are at capacity, and the West of Ifield site is in completely the wrong place transport-wise – in a way that can't be mitigated – see below.
   - *"The Government has deep pockets [for mitigations and infrastructure*]". Except we know that the public finances are extremely constrained, and that Homes England themselves are over-stretched due to increased workload and extremely high staff turnover.
   - "*The area is virtually brownfield*". Proved to be untrue by Homes England's own surveys – see below.

9. **This false narrative is robustly challenged in this submission, and in our response to the 2024 Regulation 19 consultation.**

The West of Ifield is Phase 1 of the 10,000 house plan and should be assessed as such

10. **Our third general point is that the Planning Statement does not refer to the overall vision for 10,000 houses "West of Crawley", and we have yet to find reference elsewhere in the application. This seems like a major omission in planning terms.**

11. This is important because the 10,000 plan will effectively merge the settlements of Horsham and Crawley. And because we know that the plan for 10,000 is still very much alive: Homes England continue to survey the land between Horsham and Crawley, plus we note from the application that the Market Square will be located not at the centre of the 3,000 site, but on the Horsham edge, ie to support further housing out towards Horsham.

12. It also matters because to consider the 3,000 plan in isolation from the rest of the 10,000 plan feels like a way to circumvent a more stringent planning process; in some ways similar to bid-splitting to avoid mandatory procurement thresholds (this is illegal). **We question whether this failure to acknowledge future phases of the masterplan contravenes the BNG and EIA Regulations.** The BNG legislation appears to include specific policy for large residential developments to be delivered in phases, such that applicants will be required to explain (at OPA) the strategy to achieve the BNG objective across the whole site and to demonstrate how this could be delivered on a phase-by-phase basis.

13. We note from the Environmental Statement that both Horsham and Crawley officers asked that the 10,000 plans be considered as part of the EIA process (2020 scoping exercise) but Homes England dismissed this.

14. **It feels as if five years ago Homes England were happy to publicise and consult on their aim for 10,000 houses, but since then have increasingly sought to hide these plans, despite the fact that Horsham Council refers to them in their Sustainability Appraisals of 2021 and 2023, and in the main body of the draft Local Plan (para 10.84).** Please see Appendix 1 for further details of the timeline.

15. It may be that Homes England are pulling back from publicising that the 3,000 site is the first step towards the 10,000 plan as the significant challenges of the 10,000 plan become apparent. The coalescence of the settlements of Horsham and Crawley is just the start. The site has an SSSI – House Copse – sitting right at its centre. The full Crawley Western Multi-Modal Corridor (CWMMC) would pass within metres of the SSSI and destroy the surrounding network of ancient woodland. Not surprisingly, amateur bat surveys are also suggesting extensive Bechstein's bat activity across this woodland. And the 10,000 plan and full CWMMC would have significant adverse effects on the adjoining High Weald National Landscape (AONB) and its setting.

16. Much is made in the application of the delivery of the middle section of the CWMMC, which in its full extent would stretch from the A264 at Faygate west around Crawley before passing immediately south of Gatwick to join the A23 at Manor Royal. But **plans for the full CWMMC remain aspirational, vague and uncertain, particularly with regard to its financing, its benefits, and whether the land is available.**

17. **There doesn't seem to have been any progress in securing the necessary funding for the full CWMMC,** and we can't even find any evidence that its potential cost is being discussed. Our rough estimate that the cost of the full CWMMC is likely to be in excess of £120 million, including the middle section.

18. In relation to the **safeguarding of land for the full CWMMC** Homes England's Transport Assessment (main report) states (4.29) "*Crawley Borough Council has safeguarded land for the eastern extension (to the north east) … As stated in Strategic Policy HA2, HDC Horsham District Local Plan 2023-2040, Regulation 19 (January 2024, land will be safeguarded to allow for the full delivery of the CWMMC towards the A264 at Faygate*." But if it is the case that Crawley has safeguarded land for the eastern extension of the CWMMC, the much more pertinent point is that there is still no agreement as to how this overlaps, or not, with the land safeguarded for a southern expansion of Gatwick airport. Our understanding is that this issue could not be resolved ahead of the Horsham and Crawley local plan exercises, and remains an open issue for Gatwick Airports Ltd, Horsham and Crawley councils.

19. We suggest that although the various Statements of Common Ground commit Crawley and Horsham to joint-working with Homes England, WSCC and Gatwick, the evidence from the Crawley Local Plan Evidence Base suggests there are no significant solutions for managing transport infrastructure impacts cross boundary. **In particular the possibility of the full CWMMC has not been dealt with, and is deferred.**

20. Opinion is mixed as whether the CWMMC would be of benefit in any case. The Transport Assessment reports that the transport modelling[3] for Crawley's recent Local Plan considered the potential impacts of a CWMMC, and found: "*4.20 A sensitivity test has indicated **mixed results about the potential benefits of the CWRL [CWMMC]** to further mitigate the impacts of the West of Ifield and Kilnwood Vale Sites when compared to the no CWLR scenario. Minor roads to the west i.e. Faygate Lane and Rusper Road are forecast to benefit from reduction/relief in flows, but there are **very little flow reductions on the rest of the network including Crawley Avenue [A23]**".*

21. Also, interestingly, Horsham's Sustainability Appraisal[4] states "*… proposals for the site includes the Crawley Western Relief Road with the middle section to be delivered during the plan period. While this new route may help to alleviate congestion in the area it is also **likely to reduce the potential for the achievement of modal shift**."* In other words, **the full CWMMC would undermine Homes England's aspirations for modal shift, and so fail the sustainable transport and net zero policies of local and national government.**

The view of Cerda – Planning Consultants

22. As a final point of introduction, we support the conclusions of Cerda Planning Consultants who, working on behalf of Save West of Ifield, have reviewed the application material, and concluded that the proposal is wholly unacceptable in planning terms. It conflicts with the adopted Horsham District Planning Framework (HDPF, 2015) and the National Planning Policy Framework (NPPF, 2024), is premature in the context of the emerging Local Plan, and would result in substantial and demonstrable harm that outweighs the benefits claimed by the applicant.

23. The full Cerda response[5] can be viewed on the Horsham planning portal. Their main points can be summarised:

    - The site is wholly outside the Built-Up Area Boundary and has not been allocated for development. As such, the scheme is contrary to HDPF Strategic Policy 2 (Strategic Development), which establishes that strategic housing sites should only come forward through the Local Plan.
    - It is also in clear breach of Strategic Policy 4 (Settlement Expansion), as the proposal would more than double the size of Ifield and is therefore grossly disproportionate to the existing settlement.

[3] Crawley Transport Study (2022)
[4] Horsham Sustainability Appraisal, 2021, Appendix E
[5] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=20F62848EE5D4F7CB6BA0782C344C4C7

- Furthermore, the scheme conflicts with Strategic Policy 26 (Countryside Protection) and Strategic Policy 27 (Settlement Coalescence) by urbanising open countryside and eroding the separation between Crawley and surrounding villages.
- The unjustified loss of Ifield Golf and Country Club, in an area already identified as having a quantitative under-provision of golf facilities, directly contravenes Strategic Policy 43 (Community Facilities, Leisure and Recreation).

24. The application is also premature. At 3,000 dwellings, the scale of development is so substantial that to grant permission would predetermine key strategic decisions about the scale, location, and distribution of housing growth in Horsham District. The Local Plan Review (2023–2040) has been paused following the Inspector's recommendation for withdrawal, with spatial strategy and allocations yet to be finalised. In line with the National Planning Policy Framework, approval of this application would undermine the plan-making process and prejudice the outcome of the next Local Plan.
25. It is acknowledged that Horsham District Council currently has a housing land supply shortfall. However, in applying the tilted balance under NPPF Paragraph 11d, the harms of this proposal are substantial and demonstrably outweigh the benefits. The delivery of new housing, affordable homes, schools, and open space must be considered alongside the very significant adverse impacts. These include the loss of countryside and rural character, disproportionate and unsustainable settlement expansion, coalescence of Crawley with nearby villages, the removal of valued recreational facilities, significant traffic generation and safety concerns and the pre-empting of spatial strategy outside the Local Plan process.
26. When assessed against the development plan and the NPPF as a whole, the proposal represents unsustainable development. The claimed benefits are either overstated or constitute mitigation for the development's own impacts, while the harms are permanent and irreversible. The presumption in favour of sustainable development does not apply.
27. For these reasons, it is concluded that the application should be refused.

Contents

28. The rest of this submission covers the following topics:

    A. Transport
    B. Sewage and foul/waste water
    C. Water neutrality
    D. Biodiversity
    E. Heritage.

    Appendix 1. Chronology of Homes England acknowledging their plan for 10,000 houses

29. **This submission should be considered as Part 1 of the Save West of Ifield response**. Given the volume of application material, the very unhelpful file-naming, and the server outages we have not been able to review all topics in time for what we have been led to believe is a deadline in mid-October. But we note the Horsham DC website assurance that future submissions will be fully considered (if satisfying the determination date constraints). Plus, we note that several statutory consultees have asked for further information, which we may also wish to comment on.
30. **Future submissions will cover topics including flooding and golf. Plus, further analysis of topics A–E covered here.**

A. Transport

We're very concerned that the negative impacts of the introduction of more traffic into an already congested area will be more severe than Homes England predicts. We believe that the constraints of the West of Ifield site make this inevitable and cannot be mitigated. The proposed mitigations appear to rely on a significant shift away from car-use to cycling, walking and bus-use, but as noted in the responses from National Highways and WSCC, the application lacks evidence for this being achievable.

Background

31. **Homes England's *Environmental Statement Non-Technical Summary* is misleading in claiming that the West of Ifield site is well connected to the existing highway network**: "*The Site is well connected to the highway network via Rusper Road and Charlwood Road, with easy access by road to London and Brighton, and to the strategic road network via the M23 junctions 10 and 11. Charlwood Road to the north of the Site and Rusper Road to the south, are both single carriageways*." **But the site is NOT well-connected and it suffers from considerable transport constraints.** The site is bounded on its eastern border by rivers (Ifield Brook and the River Mole). Crawley is on the other side of the rivers. On the western boundary is farmland. Ancient woodland forms the southern boundary. Beyond the ancient woodland is the Crawley to Horsham railway line and Ifield Mill Pond (a large expanse of water). The northern border meets the Charlwood Road, a category C country road. The other road related to the site, Rusper Road, (also category C), is *towards* the southern end of the site but *does not form the southern boundary*; it divides the site in two and has existing residential buildings along it.

32. **Despite these constraints, the Planning Statement is clear that West of Ifield is proposed as a Crawley extension**. **But insufficient account is taken of the fact that Crawley's A roads are congested at peak times with daily tail backs and delays**. The A264 and A2220, linking the west side of Crawley with Horsham are overloaded and have become increasingly so with the development of Kilnwood Vale and North Horsham. These east-west roads meet the A23 at the Cheals roundabout forming a traffic hotspot with, not only delays, but frequent accidents or near accidents. The crossing on the A2220 near the roundabout is used by school students en route to three secondary schools nearby: Thomas Bennett, Holy Trinity and St Wilfrid's.

33. Internally many of Crawley's neighbourhood roads are reduced to a single lane by roadside parking, as the level of car ownership far exceeds that anticipated by the original planners. Attempts to avoid delays on main roads by taking back routes through neighbourhoods, will not solve the problems and will compromise the safety of pedestrians in these areas.

34. See our short film[6] (2 minutes 20 seconds) which illustrates existing congestion on some of the roads discussed here, and some of the proposed mitigations.

Traffic congestion mitigations

35. **Homes England's proposed mitigations against increased congestion rely on a significant "modal shift", ie a behavioural shift away from car-use to cycling, walking and bus-use[7]. But as noted in the responses from National Highways and WSCC, the proposed shift is "very ambitious", with a lack of evidence for this being achievable.** We think there are many barriers to it being achieved, including:

    - Planned cycle routes *within* the site joining busy narrow roads *externally* without cycle lanes and limited or no pavements. WSCC note that the lack of detail about this onward connectivity is "*very much a concern*",
    - Crowded counterflows of pedestrian traffic on narrow pavements will encourage car travel,
    - WSCC note[8] that "*concerns are raised as to the deliverability of the bus strategy".* To which we would add our concerns about the safety of additional bus routes using roads which are narrow, with unsafe narrow pavements and where there is limited space for improvement,

[6] https://youtu.be/4bQc-QtVaZA
[7] West of Ifield Transport Assessment, Steer, July 2025 para 4.2/4.4.
https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=B0B75CCA95AA4EAE927A3A68EDA6A7DE
[8] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0EBED4C9A2144F48AA1020AE5A961695

Buses passing each other on Rusper Road near Tangmere Road, one mounting pavement. Also note narrow pavements and lack of cyclepaths.



- The local bus operator notes[9] several concerns: "*The level of service proposed is ambitious but will be very expensive to operate requiring very significant levels of subsidy and may struggle to be commercially viable when this ends. The concept of route B being commercially viable from the outset when there are minimal occupants is unrealistic. … The proposal expects a mode share of 20% which is very ambitious and much higher than is achieved virtually anywhere in the country. … The narrow bus lane arrangement on Rusper Road is a concern and needs to be revisited.*"
- A lack of evidence that the reduction in parking spaces will encourage the modal shift; experience across Crawley suggests it is more likely to increase on-street parking.

36. **Homes England acknowledges that increased traffic emerging from the CWMMC along Ifield Avenue towards Crawley would constitute a "residual negative impact". Hence its mitigations are predominantly on this stretch of road.** While these mitigations may lead to cars taking turns at junctions and improved sight lines, the tail backs (already severe at peak times) will encourage more rat-running through both Langley Green and Ifield neighbourhoods. Stagelands in Langley Green is particularly susceptible to this as it forms a route to the A23 further north either at the Tushmore Gyratory or at Martyrs Avenue. However, drivers would be passing two primary schools and the neighbourhood centre with its 20 mile an hour speed limit introduced to increase safety, particularly for children crossing. Ifield Green and Warren Drive on the Ifield side will be particularly impacted by people needing to access the station by car.

Other impacts

37. **Traffic from the West of Ifield, wishing to avoid delays on Crawley's main roads, could exit the site at the south-west onto the Rusper Road, and take the back route to join the A264 at Faygate or the A24 at the Bohunt roundabout. Neither Faygate nor Rusper is suited to take more traffic without compromising safety, the fabric of heritage buildings, and the quality of conservation areas.** Homes England draws attention to two exit/entrances: one from the CWMMC to the north, and one at the bus/emergency vehicle entrance in the south. We are aware that many readers have missed that there is a third exit onto the Rusper Road going west towards the village of Rusper[10],[11].

38. Charlwood, and other villages in Surrey such as Leigh and Betchworth, would experience similar impacts as drivers take country routes going towards south-west London that avoid main roads.

39. **A disregard for heritage is evident in specifying a road through Ifield Village Conservation Area (IVCA) for the traffic diverted from the closure of Rusper Road, without mentioning that it is in the conservation area.** The related traffic impacts are dealt with in the heritage section. The negative impact on landscape and heritage of the large-signalised junction where the CWMMC meets Charlwood Road/Ifield Avenue, Bonnetts Lane and Ifield Green would be much more severe than Homes England acknowledges. Again, this is dealt with in our section on heritage.

40. **The negative impact on the neighbourhood of Ifield West whose traffic exits at the Hyde Drive roundabout is hardly mentioned but the closure of Rusper road going west is not without drawbacks.** Accidents, or a fallen tree on the stretch of Rusper Road from the Hyde Drive roundabout to Tangmere Road leaves Ifield West with no exit. The same problem will of course arise for those in the newly formed southern cul-de-sac on Rusper Road.

[9] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=CC0216259E654CAC8C7C06845987377F
[10] Supporting Statement: Summary of Proposed Rusper Road Changes for Land West of Ifield Application https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=9B4E419D86D64EE9994C904373E3322A
[11] Latest plan: Phase 1A general Arrangement 1 of 7 10051123-ARC-010-1B-DR-HE-00001, REV P05 https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=19F527EAC42E41829688C73C5F6C6794

Safety of road-users and pedestrians

41. **The southern route for Phase 1 construction traffic from the A23 planned to be via Gossops Drive, Overdene Drive, Ifield Drive, Tangmere Road, and Rusper Road is of particular concern.** The Overdene Drive/ Ifield Drive/ Tangmere Road junction is a known traffic hotspot, exacerbated by its being the location of The Mill Primary School and Ifield Station. Delays at this junction can be as long as 10 minutes often occasioned by the no 2 buses stopping there and blocking the road. Large lorries can be seen doing a three point turn to navigate entering Tangmere Road from Ifield Drive. The stretch of Rusper Road from Tangmere Road to Hyde Drive is not designed for heavy vehicles because of its narrowness and the narrowness of the pavements. WSCC has also raised this as a concern.

42. Once the CWMMC becomes usable then construction traffic can enter the site from the north via Ifield Avenue and the Charlwood Road. While this route does not directly involve small residential roads like Tangmere Road it still raises serious questions about safety, and providing an environment conducive to cycling and walking, over the 15 year construction period. The construction traffic will pass immediately beside a primary school playground, multiple bus stops, and pavements heavily used by pedestrians. Will cycle paths be provided along the entirety of Ifield Avenue, as part of Phase 1 construction? We also note that an application to increase HGV movements along Charlwood Road was turned down at appeal[12] due to concerns about its rural nature, and potential highway safety issues.

43. **Homes England has stressed the importance of the proximity of West of Ifield to Ifield Railway Station, but the station is already dangerously over-crowded at peak times, as shown clearly in our short film[13] (90 seconds).** Ifield Station has short (5 carriages long), narrow platforms, a poor service, no car parking and is not reached by any cycle paths (there is one path from West Green but it ends when it reaches Ifield Drive.).



44. The station's short and narrow platforms are often overcrowded at peak times, forcing commuters to walk outside of the 'yellow line'. Its placement, abutting residential and commercial properties, Ifield Drive and Craigans (Road), and with the Overdene Drive bridge over the railway to the east, would make extending platforms problematic and expensive. This mitigation has not been proposed. Moving from one platform to another is only by a footbridge, difficult for people with limited mobility. The proposed improved waiting area of Platform 1 (towards London) might marginally improve safety for passengers if it can be enlarged, but no details are given of what is proposed. Increased cycle parking at the station might encourage cycling, but traffic problems at the junction by the station would discourage it. 'Public realm' improvements are promised but non-specific.

45. **Pedestrian safety has been mentioned above related to several locations.** We draw attention here to two sections of Rusper Road: a) from the bus gate to Hyde Drive and b) from Hyde Drive to Tangmere Road. In a), pavements are narrow and non-existent on one side near the junction with Hyde Drive. Mitigations on this section involve chicanes and enlarged waiting areas to allow buses to pass, but pavements will still be narrow. In section b) pavements are narrow. In both cases a) and b) see heavy pedestrian traffic especially at school start time, parents with pushchairs vying with the general public.

In conclusion

46. Collectively, Homes England's documents imply an over-reliance on desk-based assessments with only limited visits to experience the reality of the transport issues.

[12] WSCC/081/19 https://westsussex.planning-register.co.uk/Planning/Display/WSCC/081/19#undefined
[13] https://youtu.be/-9ck8lQIQEg

B. Sewage and foul/waste water treatment

The lack of sewage treatment capacity, and the applicant's failure to acknowledge this, are strong reasons to object, and may also be in breach of the EIA Regulation.

Background

47. Sewage treatment services for WEST OF IFIELD will be provided by Thames Water at the Crawley waste water treatment works (WWTW). **But these WWTW are at capacity. Thames Water state in their response to the application that "*the existing FOUL WATER network does not have sufficient capacity to support the proposed development. As such, we request that the following condition be attached to any planning permission granted: The development shall not be occupied until confirmation is provided that either [upgrades are delivered or a phasing approach is used*]"** [14]

48. Peter Lamb MP has been warning for years about the lack of capacity at Crawley WWTW, and Crawley Council was clear in its 2024 Local Plan[15] that sewage treatment is a key infrastructure issue: *"facilities will soon reach a critical point beyond which a major new facility is likely to be needed, including … possibly the sewage treatment works. …Thames Water has confirmed that the works is close to its treatment capacity … construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build."*

49. Crawley Council's concerns are based on the *Gatwick Sub-region Water Cycle Study* [16] which Horsham Council rightly included in the Evidence Base for its now withdrawn draft Local Plan. But Horsham's draft Plan itself made only passing reference[17] to the lack of capacity, promising that: "*The development will also deliver, in a timely manner … necessary sewerage upgrades*." Nothing has been said – at the time or since – about how or when the upgrades will be delivered.

50. While developers have a right to connect to an existing sewer system, our understanding is that the final decision as to whether connection is appropriate lies with the planning authority.

51. We urge HDC to consider:

- The *Gatwick Sub-region Water Cycle Study* and other technical documents prepared for Crawley and Horsham jointly and which showed that Crawley and Horley WWTWs are at capacity,
- The monitoring of the River Mole (the receiving river) by the Citizen Science Group (River Mole River Watch Group[18]), which shows the current poor quality of much of the river, and
- Information about the financial and infrastructure problems of Thames Water from the press and from parliamentary discussion.

Possible breach of EIA Regulation

52. In respect of sewage and wastewater disposal the application is almost entirely concerned with plans of existing on-site utilities infrastructure (pipes) and changes needed to these. There is no mention of the capacity constraints at Crawley or other WWTW, and no evidence that Homes England have worked with Thames Water to understand and manage any risks (more detail below).

53. We suggest that this failure to acknowledge a known and significant issue forms a strong basis for objection, and a possible breach of the EIA Regulation[19]:

- **Failure to address a known risk or constraint in the Environmental Statement** – the lack of sewage treatment capacity risks a significant negative impact from the development, namely the risk of overspill and

[14] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=73E8E4550CA641EBA07EB918A547C2E4
[15] https://crawley.gov.uk/sites/default/files/2024-11/Crawley%20borough%20Local%20Plan%202023%20to%202040.pdf Para 8.5.
[16] https://crawley.gov.uk/sites/default/files/2021-01/Gatwick_sub_region_water_cycle_study_August_2020.pdf
[17] https://strategicplanning.horsham.gov.uk/gf2.ti/-/1583938/192184357.1/PDF/-/Horsham%20District%20Local%20Plan%20Regulation%2019.pdf Para 10.92.
[18] https://www.rivermoleriverwatch.org.uk/post/river-mole-september-water-quality-status-poor
[19] The process of Environmental Impact Assessment in the context of town and country planning in England is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 Regulations')

pollution of the River Mole (already an issue at Crawley WWTW), and potential effects on human health. Thames Water's financial vulnerability could also be a risk factor that should be acknowledged and managed,

- **Failure to provide mitigation** – where a significant risk is known, the Environmental Statement and application should propose mitigation measures, and
- **Potential misrepresentation in the Environmental Statement (Chapter 14)** – the Environmental Statement claims that Thames Water confirmed capacity exists when, in fact, their position was only that capacity needs to be assessed (details below). Such a misrepresentation of a consultation response, on such a significant issue, may well have legal implications.

Failure to work with Thames Water to understand and manage risks

54. It seems clear from the application that the necessary discussions with Thames Water have not taken place. The Utility Strategy Report says (para. 4.1): "*Based on these demand estimates, further consultation will need to be undertaken with the incumbent local providers to confirm phasing and capacity within their local networks to meet the increased demand. It is understood that the separate Utilities Statement being prepared by Ramboll may describe additional, more detailed consultations that they are believed to have undertaken with incumbent local providers, but to date we have seen very limited information regarding any such liaison*."

55. But the Ramboll Utilities Statement does not add anything (para 4.4): "*The proposed discharge rate will need to be agreed with Thames Water via a pre-development enquiry application. Initial discussions with Thames Water suggest that there would be no issues with the proposed rates and connections to their sewer. ... Further liaison with Thames Water is required to agree the final arrangement*." But no evidence is provided for such a positive position on the part of Thames Water, and it appears to completely contradict Thames Water's response to this application where they clearly state that "*the existing FOUL WATER network does not have sufficient capacity to support the proposed development".*

Misrepresentation of consultation response

56. In the Environmental Statement Chapter 14 Table 14.1 it is stated that in the "*HDC: Letter dated 15th July 2024 - HDC have relayed comments from Thames Water and Southern Water, summarised below: Thames Water: • Foul water requirements both on and off Site can be met, including treatment and network infrastructure*."

57. But this is untrue. The comments that HDC actually relayed in their response to the 2024 EIA Scoping Request were: *"Thames Water consider the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met".* Thames Water were asking that the EIA process consider whether the demand can be met. They were not stating that it can be met. This appears to be a misrepresentation of the facts in the Environmental Statement.

Presentation of the application material

58. **It is proving impossible to navigate the material in the Utility Strategy Report, partly due to the sheer volume, but more due to the total lack of correspondence between the filenames on the HDC portal and the Appendices they contain**. The main Utility Strategy Report lists 15 Appendices A to O, without indication of what they contain although this is searchable for each one individually within the body of the report. The Utility Strategy Report on the HDC portal consists of the main report plus 25 Parts, but no indication of what each Part contains. We have opened these Parts, but have not been able to identify which appendices are contained within each Part. Most frustratingly, we can't find Appendix H to review the calculations of flow rates. **More generally we have not been able to verify that Appendices A to O exist anywhere in the application. We also request that Homes England provide a mapping between the Appendices A to O – with names indicating their content – and Parts 1 to 25 of the Utility Strategy Report.**

C. Water neutrality

Water neutrality requirements involve taking no further water from current supplies and finding alternative sources to furnish new demands[20]. On the water supply side, we believe that there are too many uncertainties, particularly with respect to the use of boreholes, their sustainability and the effectiveness of future monitoring. On the demand side we believe that 714,006 l/d is an underestimate and is based on the unrealistic targets.

Background

59. It is not clear whether the government's press release of 9 October 2025 stating that water neutrality restrictions are to be relaxed in the Sussex North Water Resources Zone (SNWRZ) changes the position for the West of Ifield site. Until more details are available, we assume the conditions that were in place at the time of the hybrid application still apply.

60. HE claims that the water demand of the site (714,006 litres per day-l/d) can be met by using combinations of:

- Water already provided by Southern Water (for Ifield Golf Course),
- Rainwater harvesting,
- Borehole water from the Upper Tunbridge Wells Sand Member (UTWSM), and
- Water from the Sussex North Offsetting Water Scheme (SNOWS)

Supplies, yields and scenarios

61. The table below shows the four possible scenarios HE proposed for supplies – each showing that they more than match the requirement for 714,006 litres per day-l/d.

Sources for the proposed water supply scenarios (litres per day-l/d)

SOURCE SCENARIO	IGC	Rainwater	Bore hole	SNOWS	Total supply
A1 Rain, 1 borehole SNOWS, IGC	10,420	405,688	1 borehole 125,000	304, 640	**845,760**
A2 Rain 2 boreholes SNOWS, IGC	10.420	405,688	2 boreholes 250,000	100,000	**766,108**
B Rain 4/5 boreholes NO SNOWS, IGC	10,420	405,688	4 (5) boreholes Limited to 466,000 for 1:1 blending		**882,108**
C Rain NO Boreholes SNOWS, IGC	10,420	405,688		304,640 (or more)	**720,748**
Comment	Essential for all	Essential for all	Not essential if SNOWS delivers as in C	Not essential if boreholes can deliver enough	

62. Rainwater is expected to deliver over half the demand. Eight rainwater storage tanks, with a combined volume of 1,643,200 litres are to provide the 35 days' supply required for extended drought conditions. In addition, there are two storage tanks with minimum usable volume of 27,000l and 103,000l for irrigating the allotments and the landscaped podium in the Neighbourhood Centre respectively. (check section 6.2).

63. There seem, however, to be sustainability or uncertainty issues with three of the sources, namely, rainwater, borehole water and SNOWS.

64. Rainwater has been estimated based on the last 20 years' rainfall figures and the last five for estimating required storage. The documents contain caveats related to risk from climate change in the future and the need for

[20]Water Neutrality Statement; WOI HPA-DOC-WNS-01, REV 5 chap 4 & 5 demand and reduction of demand; chap 6 water offsetting. https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=C6B20A7EE6AF47C1BEB1BAB1A7006AC6

continuous monitoring to ensure that yield remains as expected. **We are unclear, however, about where responsibility lies for future monitoring and remediation, and what can be done if supplies do not match demand.**

65. The borehole water yield has been based on flows from one investigation borehole of narrow diameter. While the 125,000 litres per day is judged '*a conservative estimate of yield*' we note the caution in the report (Water Neutrality Strategy Appendix F[21]). ***"A true estimate of yield is extremely difficult to determine from exploratory drilling."***. The report also indicates that **further work needs to be done to increase the certainty of long-term sustainability. The borehole water contains higher than acceptable levels of sodium, fluoride, boron (ref) and needs to be diluted with rainwater prior to treatment in a 50:50 ratio. As yet, no extraction licence has been granted.**

66. **SNOWS is a bit of a closed book to us. While we understand the principle of offsetting, we have not found information in the public domain about achievements**. We presume some level of confidence has been reached, but the evidence is not presented.

Demand

67. There are four categories of users and the figures that HE is working to are given below:

- Residential (including G & T) 576,640 l/d
- Educational and commercial (including hotel) 133,688 l/d
- Landscape (allotments and Landscaped podium) 3,678 l/d
- Construction (limited to the 14 years) 16,222 l/d

68. The total is therefore 714,006 l/d once the development is completed with an additional 16,222 l/d for the 14 years of the construction.

69. The calculations assume that:

- Residential use of 85 l/p/d can be achieved.
- Commercial use for the non-residential units can achieve three BREEAM Wat01 credits, giving a reduction of 40% on base-line use.

70. **The assumption that 85 l/p/d is achievable is not evidenced.** While table A-1[22] explains how this *could* be achieved, there is no report that it *has been* achieved. The trial study in Crawley[23] reduced the consumption from an existing 199.85 l/p/d to 166.52 l/p/d by the installation of water meters and flow regulators – double the target assumption. HE is planning to have flow restrictors plumbed in to avoid removal. Nevertheless, there is no evidence presented that indicates such a low consumption can be consistently achieved – or has been achieved in recent local developments.

71. A major factor in achieving the reduction is quoted as 'education' – i.e. making the public aware of the need to use water conservatively. The rate at which this will happen, or whether it will happen, is unpredictable

72. **Achieving three credits for BREEAMS is not evidenced**. To achieve this requires WCs at 3.75 litres effective flush volume and wash-hand basins taps at 5 litres/min. It also requires 25% of the WC or urinal flushing demand to be met using recycled non-potable water. Developers will be required to provide a completed copy of BREEAM WAT01 calculator and supporting evidence at each interim design stage.

Conclusion

73. With the phasing of the development over 14 years, there is an element of 'it will be alright on the night' built into the plan – i.e. that water resourcing will be able to be managed just in time for each new phase. But the uncertainties of reliability and yield of sources, the unknown effectiveness of water-use restrictions, the need for constant future monitoring and remediation, do not make a sound basis on which to proceed and do not give confidence that it will be alright on the night.

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[21] *West of Ifield Drilling and testing Factual Report WSP-WATER-REPORT-INT-0003, MAY 2025* section 7.2 p 67

[22] Appendix A of *Water Neutrality Statement* WOI-HPA-WNS-REV05

[23] Crawley study on saving water *Control Flow HL2024 Crawley Borough Council*, Cenergist, 2024 https://crawley.gov.uk/sites/default/files/2023-11/Control%20Flow%20HL2024%20-%20final%20report%20on%20Crawley%20Borough%20Council%20pilot%2C%20September%202022%2C%20Cenergist.pdf

D. Biodiversity

In summary, we're concerned that the biodiversity value of the baseline, and the effects of the project, are under-played, and that the mitigations are inadequate. We also note possible breaches of the EIA Regulations[24], BNG legislation[25], and the NPPF. The comments are grouped in line with the EIA process, i.e. assessment of the baseline, assessment of the effects or impacts of the development, proposal of mitigations, and assessment and scoring of residual effects

Assessment of the baseline – habitats and species

74. **The site and surroundings have significant biodiversity value, as evidenced by the detailed survey results included in the Environmental Statement, and the records in the Sussex Biodiversity Records Centre database (SxBRC).** Both paint a picture of the important and priority habitats and many species of birds, mammals, reptiles and invertebrates of conservation importance. The SxBRC report (Appendix 8.3 of the application) shows records for 351 protected and designated species, and of these 52 species with international designations and 138 with national designations. These records relate to an area of the site plus 2km (and plus 5km for bats).

75. **We're concerned that the biodiversity value is being downplayed by Homes England and in the Environmental Statement.** For example, in terms of the species identified:

    - The population of Bechstein's bats is judged as Regionally Significant, but we would argue should be Nationally significant. The importance of the colony is downplayed by proposing (para 8.9.64 and Table 8-9) that there are two colonies associated with the site – north (Ifield Wood) and south (golf course) – whereas they in fact constitute a single colony of around 200 individuals – a size which is of National importance. As a result of incorrectly considering only the site itself, the individuals observed using the site, and considering the social groups as distinct unrelated colonies, it is concluded that the site does not qualify for SAC status. But a SAC designation would be appropriate for the site and all the neighbouring areas used by the colony such as Ifield Wood, Hyde Hill Woods and The Mount. The applicant also incorrectly argues that Bechstein's don't use 'open habitat' and so much of the site is not important for this species. This is contradicted by the radio-tracking which shows that these open areas form a large part of the bats' home ranges as they use these tree lined hedgerows to commute from one woodland area to another.

    - The assemblage of invertebrates is judged to be of Regional Significance, but given the number of nationally scarce, rare, threatened and endangered species the expert ecologist concluded "*the site as a whole should be regarded as being of **at least** regional conservation value for invertebrates, with Areas A and D approaching national importance".*

    - The bird populations are categorised as being of only Local Importance, based on desk studies and limited surveys (which we note are out of date according to CIEEM guidelines[26]). The Environmental Statement emphasises the survey data which identified only 8 red listed and 13 amber listed species (Birds of Conservation Concern – BOCC), but this is significantly lower than suggested by the Sussex Ornithological Society (SOS) in their response. The SOS concludes that of the "*81 species recorded in the three 1km squares containing the site(1) in the past 10 years (2015-2024), 15 species are red listed on the BOCC list and 22 are amber listed."* The SOS objects to the development, saying "*The land which it is proposed to use for this development is of considerable value in terms of bird numbers and diversity of species*".

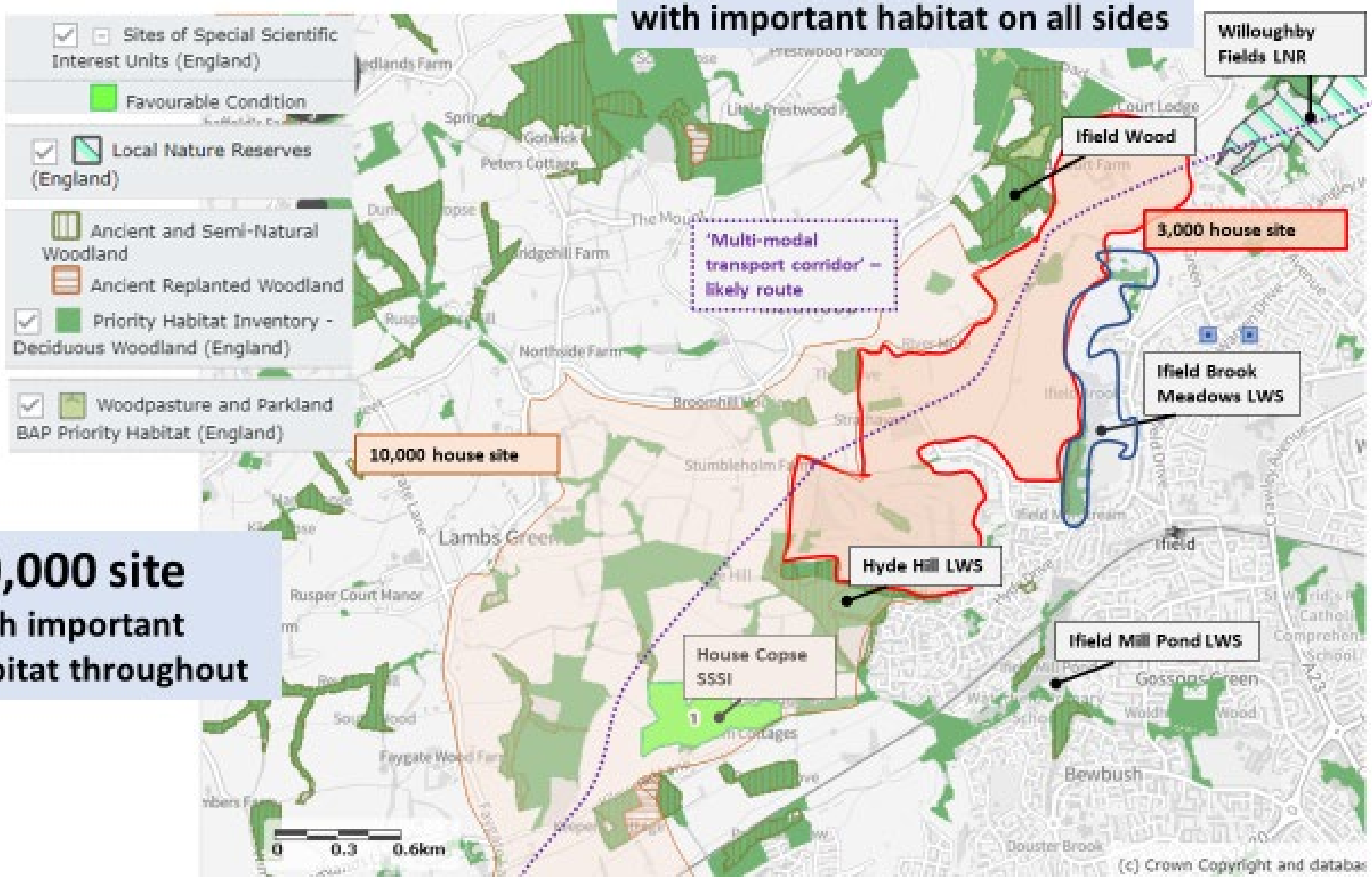
76. **The value of the habitats across and surrounding the site are also downplayed in the Environmental Statement. The extreme diversity and mosaic nature of this Low Weald area is not acknowledged, nor the extent to which the site is bordered by designated wildlife sites (LWSs) and ancient woodland.** See map below.

    - The latter is clear in the maps of Appendix 7 of Appendix 8.1 of Chapter 8, which show priority habitat, ancient woodland, watercourses, etc. but this conclusion is not drawn in the main report.

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[24] Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 Regulations')
[25] Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
[26] CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017) states, If the age of the data is between 18 months to 3 years an updated survey and report will be required and anything more than 3 years old is likely to be invalid https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf

West of Ifield 3,000 site
with important habitat on all sides



10,000 site
with important habitat throughout

- Ifield Wood, which borders the site to the north-west, is primarily made up of ancient woodland and is a key site for the Bechstein's bat population, but is not mentioned in relation to ancient woodland or the need for protective buffers. Also, it is incorrectly stated in para. 8.10.130 that Ifield Wood will be protected from adverse recreational usage as there are no public rights of way through it, whereas there is a public footpath running through the Wood from The Druids, across the road by Beaumont Lodge.
- The rich habitats of Ifield Golf Course are not acknowledged despite their important for Bechstein's bats, and for an assemblage of reptiles of County Significance

77. **We disagree with the scope and conclusions of the hedgerows assessment. The surveying is incomplete, and it feels as if most of the hedgerows most impacted by the development have not been assessed.** Why have the significant and species-rich hedgerows associated with the River Mole, and those running north-south across the centre of the arable fields at the heart of the site, not been surveyed? We're also puzzled by the statement in Appendix 8.35 that "*Hedgerows Regulations do not apply to hedgerows that are within golf courses."*



78. We question the conclusions relating to the hedgerows most affected by the CWMMC. Our understanding is that H15, H29 and H35 will be destroyed, and H16 and H27 at least severely impacted. We argue that H15 and H35 should be classified as "important", because they're both adjacent to a footpath and contain more woody species than suggested. H27 is adjacent to the ancient woodland of Ifield Wood, which should be acknowledged and suitably mitigated. The hedgerows which will be destroyed by the bridge over the River Mole should of course be included in the assessment.

79. **Not only was the surveying of fish and wetlands scoped out (see below) but it appears that plants, lichen and fungi have been scoped out and so not surveyed**, although this is not stated explicitly in Table 8-11. This goes against the advice of Natural England and the HDC Ecology officer (Table 8-1). Chapter 8 para. 8.9.13 states: "*No rare or notable plant, lichen or fungi were identified from the desk study.*" This is a surprising omission given there are 22 Sussex Rare records in the SxBRC report, and in their response Sussex Wildlife Trust note the uncommon species in Hyde Hill Woods LWS such as Wild service tree, Midland hawthorn and Violet helleborine.

80. Given the large number of species designated of conservation importance, **we suggest that the species-level reports should be reviewed by an independent expert**, to provide advice on the legal requirements for the protection of the designated species, and to assess whether the proposed mitigations are appropriate and legal. We also have serious concerns about the applicant's judgement on the impacts of the development – see below – and we urge HDC to seek an independent review of their impact assessments, at both species and overall level.

81. **We have not been able to find an overall assessment of the site's existing biodiversity significance and ecology, or analysis of the inter-dependence of its features. The Environmental Statement assessment is incomplete without one.** Although there is passing mention (8.9.5) of the fact that the site falls within both the Horsham District Nature Recovery Network and two Biodiversity Opportunity Areas, no link is made with the ecological value of the area as a whole.

82. We're concerned that **the Environmental Statement: Non-Technical Summary[27] does not present an accurate and balanced summary of the findings of the Environmental Statement, missing the diversity and number of protected species and habitats present** but has a clear bias towards a positive narrative and reads like a public relations pitch for the development. Given the Non-Technical Summary is a requirement of the EIA Regulation, this misrepresentation could constitute a legal breach.

Assessment of the Impacts

83. **We note that the Sussex Wildlife Trust[28] "*objects in principle to this application*,** *which proposes to develop a large green-field site supporting numerous recognised wildlife sites and natural capital assets, such as wetlands*

[27] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0F6EA9479B324D83B002DD0C207240C2
[28] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=5F92D2A967D445BDA851E634A19CF039

and ancient woodlands. The Trust is particularly concerned at the direct loss of important wildlife sites such as part of the River Mole but also the indirect effects of intensified recreation and human disturbance on sensitive habitats and species, and the impact on the District's wider ecological network". The Trust highlights how Ifield Brook Meadows LWS and Hyde Hill Woods LWS would be affected.

84. **We're extremely concerned that Ifield Brook Meadows LWS will be surrounded by housing and so isolated from its existing connections to the existing ecological network of hedgerows and tree-lines. The fact that these will be severed is not acknowledged**, despite being raised as a concern by Sussex Wildlife Trust. We're also concerned about plans for a "*sensitively designed east-west pedestrian / cycle connection across Ifield Brook Wood and Meadows*" and particularly the fact that the relevant biodiversity assessment is being delayed and not being done now as part of the EIA exercise. **We question whether this breaches the EIA Regulation.**

85. **It's not clear what the "wholly exceptional reasons" are to justify the loss of an irreplaceable veteran tree**, as required in NPPF para. 193. We can only find the following vague reference in the Planning Statement: 7.14.25 "*Given the strategic nature of the scheme and the public benefits, it is considered that wholly exceptional reasons exist which justify the loss of this veteran tree and which clearly outweigh the loss of this habitat*." This does not seem convincingly exceptional.



Route of the link road (CWMMC) through pasture, with veteran Oaks, one of which will be felled

86. **The Environment Agency finds that the application contains inadequate assessment for compliance with the Water Framework Directive[29] (WFD), Biodiversity Net Gain (BNG) and the Environmental Statement.** They say the negative impacts on aquatic habitats have been overlooked, with a lack of adequate mitigation and enhancements proposed. The assessment does not adequately show that the bridge crossing of the River Mole and associated enabling works will not have a detrimental impact on the watercourse, its corridor and associated ecology, fisheries and physical habitats. **This suggests a breach of the regulations for WFD, BNG and the EIA.**

87. This is in direct contrast to the applicant's own judgement that "*impacts on watercourses are considered to be limited …[and] significant effects on fish species using the watercourses were not considered likely*". Given this is so at odds with the legislation, and the consultees' advice, we suggest that **the applicant's judgement about impacts more generally is called into question, and means that the scope of the EIA may have been flawed from an early stage.**

88. **In the context of the inadequate surveying of watercourses and wetlands we note the project being led by the South East Rivers Trust** – Restoring the Upper Mole Catchment[30] – and its initial focus on the Mole from its source near Rusper down to and across the West of Ifield site (note that this section of the Mole is sometimes referred to as Baldhorns Brook). The initial surveying has recorded 62 aquatic species via eDNA, including fish, mammals, birds, and amphibians.

The Mitigations and BNG

89. We note that **the EIA scores the residual effects as Negligible (not significant) for almost all species groups, and for habitats overall, suggesting that either the effects of the development are assumed to be almost minimal, and/or the mitigations are assumed to be exceptionally effective.** We have not yet had time to review whether this seems justified, but we do place significant weight on the responses from expert consultees:

    - **The Environment Agency and Sussex Wildlife Trust state that the BNG assessments have not been prepared in line with 'The Statutory Biodiversity Metric User Guide'**, including lacking adequate baseline or post development assessments of watercourses, and proposals for adequate BNG uplift for all watercourse

[29] https://www.legislation.gov.uk/uksi/2017/407/regulation/19
[30] https://www.southeastriverstrust.org/projects/gatwick-airport-nfm/

types. We note the Environment Agency's view that the proposed bridge crossing will cause 'major/major' riparian encroachment, which has not been captured.

- **The view of the Sussex Wildlife Trust is that "** ***… adequate mitigation and compensation has not been provided,*** *and the reasons for development cannot be considered to be wholly exceptional given that there are other sites available. As such,* ***Paragraph 193 of the National Planning Policy Framework (NPPF) is clear that permission should be refused."***

- The Sussex Ornithological Society submits that "***the BNG and other mitigations put forward in the documents prepared by the developer are wholly inadequate*** *to offset the loss of, and damage to, these valuable bird habitats. …we submit that the application should be refused."*

90. **We have various questions about the mitigations which we intend to follow-up in later responses. For example:**

- **Is there an over-reliance on buffers as mitigation?** It's hard to judge given the lack of detail provided. We also note that the Parameter Plan suggests no buffering along the ancient woodland boundary with Ifield Wood, which seems counter to NPPF 193.

- **How can the proposed mitigation for adverse effects on House Copse SSSI be adequate?** Para 8.1.1 suggests that the greenspace in the north of the site (adjacent to Ifield Wood) will reduce visitor pressure on designated sites, such as House Copse SSSI. How does this work? Is it sufficient? And what are the mitigations for the increased recreational pressure on the north of the site, in particular the neighbouring ancient woodland of Ifield Wood?
- **Are the mitigations for the Bechstein's bat population sufficient, and should Hyde Hill Wood be designated as an SSSI?** According to the minutes[31] of a meeting between Horsham Council, Homes England and Natural England: "*NE also recognise that the Hyde Hill Wood and immediate surrounding area supports a notable population of Bechstein's bats which would satisfy designation criteria as a site of special scientific interest.*" But the minutes also record that Natural England reiterated that "*although the Bechstein's colony at Hyde Hill Wood would satisfy SSSI designation criteria, they do not currently fall into the highest category of importance and Natural England would not be looking to designate the site at this time due to prioritisation needs internally.*" We are seeking clarification about what this means.

E. Heritage

HE has correctly identified the listed heritage assets within the area. It has also correctly identified that the West of Ifield will produce significant adverse heritage and landscape impacts and acknowledged that no mitigations can prevent this happening. We regard these negative impacts to be so great that the application should be refused.

Background

91. There is evidence of occupation of the Ifield area from Anglo-Saxon times (Domesday entry) and earlier (archaeological findings). It was largely a rural area, making use of woodlands, meadows and marginally better drained areas cleared for growing grain leaving the patchwork landscape typical of the Low Weald. Traces of the iron industry that flourished at two periods in its history are easy to find. There were (and still are) moderately large estates with tenant farmers, and patches of common land, typical of basically a dispersed



13th century St Margaret's church from Ifield Brook Meadows Local Wildlife Site and Local Green Space.

[31] A version of the minutes for this meeting was published in Homes England's Hearing Statement for Matter 9 of the December 2024 Local Plan Examination hearings. Page 259. https://www.horsham.gov.uk/__data/assets/pdf_file/0016/142342/M9.07-Homes-England-HA1-HA2-1193327_Redacted.pdf

community. The Church (grade I listed) which dates from the 13th century was geographically the centre of the Parish. It had its dissenters, as revealed by the building of one of the earliest purpose-built Quaker Meeting Houses (also grade 1 listed) in the country less than a mile from the church.

92. The establishment of Crawley as a post war New Town split the parish in two at Ifield Brook and the River Mole, putting half in Crawley and half in Horsham. This administrative boundary reflects neither the natural nor historical boundary. The Ifield Village Conservation Area[32], with the church, the meeting house and erstwhile common land and meadows are in Crawley, Ifield Court farm and the Ifield golf course are in Horsham.

93. The boundary at Ifield is described as a well-integrated boundary, with the town dissolving slowly into the village and into the farmland and lives up to the new town concept of a town in the countryside. That, in itself, is a heritage asset worthy of retention. There is no other part of Crawley so well integrated because of the arterial roads that circle the rest of the town.

94. Ifield Court Farm, immediately on the Horsham side and destined for destruction if the development goes ahead, was the site of a mediaeval farmhouse within a moat, parkland, patches of woodland, and arable and grazing fields divided by hedgerows. The farmhouse was destroyed by fire in the 1800s but the moat remains and is in water (and is a scheduled monument). The parkland, and the arable and grazing fields, and patches of woodland, are all accessible by long established Public Rights of Way (PRW) that lead from the conservation area. Rural PRWs from here lead to Ifield Wood, the Mount, Lambs Green and Rusper, with minimal use of roads.

95. Ifield Golf course, also destined for destruction, is important not only because of its thriving community, but also because of its exceptional design. Golf courses, like buildings, have architects – and those appointed to build this IGC were ~~of~~ held in high regard. When IGC came up for sale in 1943, the auctioneer's catalogue[33] stated: "*Designed and laid out by Messrs. Hawtree and J H Taylor, and with the maturity now acquired, it is one of the prettiest country courses in the Southern Counties*". The 18-hole course took "*full advantage of every natural feature, including a ridge of rising ground along the centre of the course, as well as natural woodlands and a dell formed from an old pit. Clumps of Scots Firs have been planted in suitable positions and are now well established*." Additional trees were planted at the time of the Millennium. The course is known as a haven for wildlife. A PRW near the entrance and another running along the eastern end of it allows non-club members to enjoy the environment.

Impacts of the proposal

96. There will be the **loss of a well-integrated boundary** between the conservation area and the new development. The western boundary of the proposed development Is abrupt with its highest buildings closest to the adjacent countryside. Screening with a line of trees is all that is proposed. The natural buffer of floodplain along the rivers on the eastern boundary of the site will not screen out the light, noise and visual impacts of this vastly contrasting development.

97. **Views from and into the conservation area will be altered**, and Homes England's mitigation of keeping a sight line to the church open from West of Ifield is hardly an adequate compensation for the loss of historical context of the church. **Views from the Charlwood Road over the parkland will be completely obliterated**, not only by the destruction of the parkland itself by the CWMMC cutting a scar across it, but also by the introduction of the large signalised junction quite out of character with the existing street scene.

98. **The significance of the entirety of Ifield Court Farm being an example of an estate with farm and woodland, linked to others of similar ilk, will be destroyed. Its moat will lose its historical context and only be shielded from the road by a bund.** The response from Historic England[34] (24.09.2025), as a statutory consultee, identified clearly the damage that will result from the severance of the moat from its setting.

99. **Loss of the one remaining part of Crawley which retains the concept of a town in the countryside** is a heritage loss.

100. **Signalised crossings of a wide road in place of country PRWs** is not only a heritage loss but also a loss of tranquillity and peace, so important for people living in a busy town.

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[32] *Ifield Village Conservation Area Statement, Feb 2018* https://crawley.gov.uk/sites/default/files/documents/INT169915.pdf

[33] Knight, Frank and Rutley, 22 July 1943 *Sale of Ifield Estate and Lordship of the Manor of Ifield*.

[34] https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=73E8E4550CA641EBA07EB918A547C2AF

101. **A large engineered wide bridge over the Mole in place of a wooden footbridge** on a PRW is out of keeping with the area and not a safe route for animals. It represents yet another example of how there is a **lack of integration of style between the existing landscape and buildings, and the development**. Screening with trees or a hedgerow is not adequate mitigation.

102. **The impact on the conservation area is far greater than HE predicts**. We are totally baffled by the traffic assessment that Ifield Green will see *less* traffic when it is being used as a diversion. We predict delays far longer than those HE predicts because of the narrowness of the road and the places where it is reduced to single lane because of road-side parking near older buildings. There is also the chance that drivers will be tempted to rat-run through Rectory Lane, which is totally inappropriate.

103. **Similar impacts will be felt within the conservation Areas of Rusper and Charlwood through increased traffic (see traffic section**). The older buildings in both are near the roads and tailbacks occur. The safety and quality of both these villages will be compromised. The junction at the Star Inn in Rusper is a particularly dangerous place with the village shop on the junction and the primary school close by.

104. **It is a pity that well designed golf courses do not warrant the protection of historic parks and gardens**. The loss of IGC is a loss of an exceptional design and a heritage asset – it is also well used.

Conclusion

105. HE identifies acknowledges all these losses[35] and lists "Public heritage interpretation and outreach" for the mitigation of the residual effects. There is vagueness in what this would entail, and who is to deliver it.

106. Is this really only a 3000 houses development? The size, and style of this development is so out of keeping with the existing environment and would occasion such large heritage losses that it has all the air of being just the start of a much bigger project. The plans show the neighbourhood centre near the boundary poised ready to accept more development on the other side – poised to extend to the 10,000 that was originally in Homes England's narrative. It may be for this reason that HE has decided that the heritage losses and the incongruity between this design and the existing area can be tolerated.





[35] Environmental Statement Chapter 10 heritage paras 10.10.22/24 and Table 10.7
https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0F6EA9479B324D83B002DD0C207240A5

Appendix 1. Chronology of Homes England acknowledging their plan for 10,000 houses

Around 2020 – stakeholder presentations were clear that this is phase 1 of a masterplan for 10,000 houses and a Western Link Road (bypass) from Faygate through Lambs Green to Manor Royal / Gatwick.

The 2020 EIA scoping request discussed Potential Cumulative Effects, including (para 4.8.6) "*Potential future expansion of a wider West of Crawley Garden Town Strategic Opportunity to the south-west of the site that could comprise in total approximately 10,000 new homes when including the proposed homes as part of the proposed Development. There are no specific proposals for this wider opportunity at the moment, however dialogue is ongoing through the HDC Local Plan preparation process.*"

HDC's response to the request: *'Reference should also be made here to the aspirations of the [3,250] site to be part of a wider scheme for up to 10,000 dwellings for the land to the west of Crawley. The land west of Ifield is the first phase of this wider development which is intended to deliver a link road joining the A264 to the south to the A23. It is important that this narrative is outlined in the EIA so that cumulative impacts can be considered where necessary.'*

And Crawley Borough Council's response: *"Homes England has promoted a much more extensive development for up to 10,000 homes on land West of Ifield. While this is understood to be speculative, the other proposed phases should be identified in some way or at least recognised. This is critical as some of the proposed solutions for the ES and the proposed development may be affected by the potential further expansion of the development over the longer term (for example flood mitigation or biodiversity). It would also allow the cumulative impacts to be better assessed".*

Horsham Council's 2021 Sustainability Appraisal stated that the West of Ifield would deliver "3,250 dwellings (10,000 in longer term beyond plan period)" and "It is expected that the site has the potential to deliver around 3,250 homes in the plan period up to 2038 and 10,000 dwellings in the longer term."

In 2023 the Sustainability Appraisal was updated to include 30 year visions for each of the strategic site options based on information from the site promoters about the realistic development and infrastructure which was expected to be delivered over this longer period. In p**ara 4.34 we have: "Site SA101: Land West of Ifield (urban extension)** *3,250 dwellings and approximately 9,000sqm B2/B8 and former B1 uses (c.2.0ha) within the plan period (and a total of 10,000 dwellings in the longer term when fully built out)."*

2025 – Homes England don't mention the 10,000 plan in either their exhibition event in April, or their planning application, but continue to survey the proposed site for the whole 10,000 plan.