

For the attention of Horsham District Council Cabinet and Councillors.

Dear Sirs,

I confirm that I object to planning application **DC/25/1312** for West of Ifield for the following reasons.

Objection 1. Reference DC/25/1312 - Infrastructure and Transport

The additional development of 3,000 has not considered the impact on local infrastructure fully and the minimal mitigation measure suggested are totally inadequate.

The **Horsham District Council Infrastructure Delivery Plan 2023**

Horsham District Council | Infrastructure Delivery Plan 2023 Key Issues & Future Considerations page 26, states that

“The assessment of the impacts of the Local Plan on the SRN, has indicated that the A23 is already over capacity within the Reference Case model and this traffic is resultant from background growth of traffic not related to the Horsham District Local Plan.

The Horsham Transport Study recommends that further discussion is held with National Highways to quantify impacts that would specifically arise from the Local Plan and potentially explore options for mitigation in the next Road Improvement Strategy (RIS).”

Any mitigation measures planned, for construction and additional traffic flows need to be in place before any approval.

The additional surrounding strategic sites are not included in a cumulative assessment of the traffic modelling for the West of Ifield development.

The HDC Local Plan is negligent by not giving attention to these matters to ensure the Rusper road network has the capacity to safely carry the expected additional density of traffic stemming any approved building allocations to Rusper Parish and its immediate vicinity.

Due to the planned closure of Rusper Road beyond the Ifield Golf Club in the direction of Rusper, vehicles that exit the new planned estate on the golf course, vehicles on the school runs and the addition of proposed bus routes will make Rusper Road to the Hyde Drive roundabout virtually impassable. This will cause extreme congestion at the Hyde Drive roundabout.

- The roads connecting the site to Crawley or to any major roads have insufficient capacity, the location of the West of Ifield site does not allow for appropriate promotion of sustainable transport modes and its development would be contrary to both the NPPF sections 106 and 110.
- The plan fails to provide strategic links into Crawley or major transport routes. Instead it will channel all traffic from the development onto two rural roads: Rusper Road(to Rusper) and Charlwood Road / Ifield Avenue, which are already dangerous and at capacity. It is apparent that the traffic modelling has been 100% desk-based and is seriously inadequate:
- The baseline is current traffic volumes, and additional volumes are then predicted. But current congestion is proof that previous modelling hasn't worked.
- The modelling is overly optimistic about the extent to which residents will shift away from car use towards walking, cycling and using public transport. • And the impacts on nearby villages such as Rusper, Faygate and Charlwood have been underestimated.
- Rusper Parish currently has only C class roads and all are narrow country lanes, Rusper Road is 4.9m wide or less, with a lack of footpaths and are heavily used by agricultural machinery, cyclists and equestrians. There are several rat-runs through the parish at peak times, which can be very dangerous to residents.
- The capacity of the Parish's Road network to carry the increased traffic that the housing allocation will generate and cope with the increase without risks to road safety are matters of deep concern in the light of predictable traffic movements from the three main strategic sites around Rusper.
- In the case of the North Horsham development, the 'rat running' evidence base demonstrates drivers have a preference at peak times to avoid congestion on the southern approaches to Crawley by using Rusper's road network and this 'rat running' preference is likely intensify with the convenience of a new multi carriageway road through the West of Ifield estate. In the case of the West of Ifield development, traffic to and from a southerly or westerly direction will

have no alternative to using Rusper Road network and traffic to and from an easterly or northerly direction will have no alternative to using urban residential roads in Crawley Borough.

- Both the Horsham and Crawley Transport studies of traffic assessments for the strategic developments in Rusper Parish and its immediate vicinity have been addressed independently of each other, but it is self-evident those assessments are inadequate because the impact of traffic from the Local Plan's building allocation will be cumulative. This cumulative impact is recognised by the Council's policies ref. Chapter 8: Infrastructure, Transport and Healthy Communities issue box bullet 7.
- . There is no direct link into Crawley from the proposed HA2 strategic site, meaning that all West of Ifield traffic will be forced to use the existing minor rural roads around the development to access Crawley, Horsham, Gatwick, the A264, A23 and other major routes.

Improvements to buses, rail and active travel

The proposed Fastway bus service will be impacted by Rusper Road congestion, particularly with the addition of the two planned schools.

The Horsham District Council Infrastructure Delivery Plan 2023 Horsham District Council | Infrastructure Delivery Plan 2023 Page 28 states that, *“Bus travel plays an important role in improving sustainable transport, reducing the number of private vehicles on the road, and thus reducing congestion. In Horsham District, 88% of households own at least one car compared with a regional average of 81% and a national average of 74%. 76% of journeys to work from residences within the district tend to be taken by car.”*

Rail travel

The lack of car parking, limited cycle parking and limited platform length and widths do not support additional passenger capacity. Additionally, the Network Rail timetable is already operating at maximum capacity for train services on this section. Passengers will need to travel to Crawley or Three Bridges adding to the congestion on the local road system.

Objection 2. Reference DC/25/1312 - Infrastructure – Sewage

The application ignores the fact that Crawley sewage treatment works are almost at capacity and has already been red-flagged by Thames Water. Crawley Council and Thames Water have raised this as a concern over the past two years. But Homes England, and Horsham Council, appear to have done no planning to mitigate the risks.

The application documents contradict each other about whether Thames Water have even been consulted. This failure is a strong basis for objecting and could be a legal breach.

Simon Collins of the River Mole Watch states. “*The development proposal is fundamentally unsound because it fails to acknowledge the woeful status quo. There is a real risk that the delicate and nascent progress to reduce sewage spills by Thames Water, already floundering under existential threat from financial mismanagement, will be submerged in a torrent of additional pressure brought upon it by climate change impacts exacerbated by increased urban cover, more housing, increased population, inevitable urban creep and vulnerable water supply.*”

Furthermore, it is acknowledged that Thames Water are in severe financial difficulties and would not be able to fund any improvements required to allow the speculative plan to proceed.

Objection 3. Reference DC/25/1312 - Golf

Homes England have submitted a speculative plan to Horsham and District Council in the absence of an approved local plan, to build 3,000 new homes on Ifield Golf Course.

Homes England have been unable to demonstrate that Ifield Golf Course is surplus to requirements in accordance with NPPF paragraph 104.

Reference NPPF - September 5, 2023

Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

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Homes England have failed to offer adequate mitigation in supplying equal or better-quality alternative facilities.

Furthermore, since the initial plan was submitted there have been further closure and planned closures of local golfing facilities in our area at West Chiltington, Ruser, Redhill and Reigate, Effingham Park and the approved closure of Horsham Golf and Fitness. Moreover, there has been a reduction in holes at Mannings Heath and Cottesmore and Gatton Manor has applied for change of use so yet another closure is imminent

In total this represents the closure of 117 holes of golf in an area which is going to be under grossly provided.