

To: Horsham District Council / Case Officer

Ref: DC/25/1312 – Land West of Ifield

12 Parkfield Close, Gossops Green, Crawley, W. Sussex RH11 8RS

Date: 13<sup>th</sup> Oct 2025

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

I We write to formally object to the hybrid planning application DC/25/1312 (Land West of Ifield) on the following grounds:

## **1. Pressure on Local Resources & Services**

### **1. Health / GP / NHS Services Overload**

The proposed addition of up to 3,000 homes (Phase 1), with a longer-term intention of up to 10,000 over 20 years, necessarily brings a large influx of new residents.

At present, the local GP surgeries, dental services, community health services and hospitals are already under strain. The application and accompanying viability assessments do not credibly demonstrate sufficient capacity, nor realistic plans, to expand or staff health care provision commensurate with the future demand.

### **2. Education & Community Infrastructure**

The application includes provision for a secondary school and other community facilities.

However, there is no clear guarantee these facilities will be delivered in time for the needs of early phases. If they are delayed or underfunded, the burden will fall upon existing schools, which are already stretched. The viability assessments appear optimistic and lacking in robust commitment to guarantee timely delivery.

### **3. Utilities, Drainage, Waste & Social Services**

The scale of development will require significantly expanded utilities (water supply, sewerage, energy, waste collection) and social services (waste, libraries, policing, leisure). The application and its supporting documents provide insufficient detail to show that these essential services can be scaled up without severe stress or adverse impacts on existing communities.

## 2. Additional Traffic, Congestion & Road Safety

### 1. Traffic Volumes & Trips

The addition of thousands of dwellings will generate many thousands of new vehicle trips daily (commuting, school runs, shopping, leisure). Conservative modelling in earlier objection briefs estimates up to 4,200 additional cars at full occupancy just for Phase 1. Many of these new trips will necessarily pass through residential roads in Ifield, Langley Green, Ruper, Charlwood, and local lanes unsuited to heavy traffic.

### 2. “Rat Runs” & Local Road Stress

The local minor roads and lanes are not designed for high volumes. The scheme will encourage “rat runs” through village streets as drivers seek to shortcut around congestion on main arterial routes. The additional traffic burden will accelerate wear, increase noise and safety risks for pedestrians (especially children), and reduce quality of life for residents.

### 3. Junctions, Roundabouts & Network Capacity

Key junctions (for example, Cheals Roundabout, roads connecting to the A264, the M23) are already under pressure. The application’s transport assessments do not convincingly demonstrate that mitigation is sufficient to prevent unacceptable congestion and delays during peak periods. Moreover, increased traffic entering the existing Air Quality Management Area (AQMA) (e.g. toward Manor Royal, Gatwick access) will worsen air pollution.

### 4. Non-Car Modes Insufficiently Mitigated

## 3. Ifield Golf Club Is Not ‘Spare Land’

1. 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.

2. 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.

## 4. Impact on Local Wildlife, Ecology & Biodiversity

### 1. Loss of Habitat & Fragmentation

The development covers a large swathe of greenfield land and will inevitably lead to loss, degradation, and fragmentation of existing habitats (woodland, hedgerows, grassland, wetlands).

In particular, Ifield Brook Meadows, a designated Local Wildlife Site, lies adjacent to or within influence of the proposed development. The proposal to integrate it with cycleways, footpaths, or even convert some parts into amenity space is tantamount to habitat intrusion and increased disturbance.

### 2. Protected Species

Ecological surveys submitted (or alluded to) indicate the existence of Bechstein's bats on and around the site, which are a rare and highly protected species. The habitat connectivity to Surrey is important.

The application's ecological mitigation is inadequate: it downplays the importance of these findings, insufficient buffer zones are proposed, and there is no credible long-term management strategy to ensure such species are not lost due to the development.

### 3. Wildlife Corridors & Connectivity

Wildlife does not adhere to human administrative boundaries. The site lies along corridors that connect to the Upper Mole Valley and beyond, facilitating movement of species. The proposal fails to address collaboration with adjacent local authorities and cross-boundary habitat strategies.

### 4. Cumulative Impact & Under-recording

The district's existing habitat maps and species databases are likely under-recorded. The development may set a dangerous precedent of eroding biodiversity in areas currently considered marginal but ecologically significant. The cumulative loss of greenfield habitat is contrary to national and local biodiversity policies.

## 5. Flood Risk & Suitability for Development

### 1. Flood Zone / Flood Plain Concerns

The site lies, at least in part, on a flood plain (or is subject to flood risk). I note that flood risk mapping services (e.g. the national Flood Map for Planning) indicate vulnerability to river flooding and surface water flooding.

Building dense residential development in flood-prone areas is contrary to

the principles of the National Planning Policy Framework (NPPF), which requires that development in high flood risk zones be avoided unless there is no reasonable alternative, and only if appropriate mitigation and flood resilience measures are in place.

## 2. Inadequate Flood Risk Assessment / Mitigation Measures

The submitted Flood Risk Assessment (FRA) is either insufficiently rigorous or optimistic in its assumptions. It does not convincingly demonstrate that the proposed development would not increase flood risk to neighbouring properties or further downstream.

Key concerns include:

- Whether compensation for lost floodplain storage has been properly quantified and modelled.
- Whether surface water (pluvial) flooding and groundwater flood risk have been addressed adequately, particularly under climate change allowances.
- Whether finished floor levels are set sufficiently above flood levels, and whether property resilience (flood proofing) is robust.
- The long-term maintenance of drainage infrastructure, SuDS, and potential failure scenarios.

Without these robust assurances, there is a real risk of exacerbating flooding locally in times of heavy rain or storm events.

## 3. Precedent & Policy Conflict

The NPPF and associated planning policy guidance discourage development in areas of high flood risk unless exceptional circumstances are demonstrated and mitigations are convincingly secured. Development in a functional floodplain (or where flooding is a foreseeable hazard) should only be for water-compatible uses or essential infrastructure, not dense housing.

Past planning jurisprudence (e.g. objections to developments in Flood Zone 3) emphasizes that floodplain development should be avoided unless there are strong justification and no adverse impacts.

# 6. Inconsistency, Deliverability & Risk

### 1. Unproven Deliverability / Viability

The sheer scale of the proposal (3,000 homes in Phase 1, up to 10,000 ultimate) demands extensive upfront infrastructure (roads, drainage, utilities, schools, health, community). There is no persuasive evidence that all these can be delivered in step with the housing development in a financially viable manner, particularly given the need for mitigation (ecological, hydrological, transport).

The applicant's viability and phasing assumptions seem optimistic and underplay the risk of delays or shortfalls in infrastructure delivery.

### 2. Sequential Test / Alternatives

The application does not appear to robustly demonstrate that there are no reasonably available alternative sites with lower flood risk, less ecological sensitivity or better existing infrastructure. The sequential test required under NPPF for development in flood risk areas needs stronger justification.

### 3. Risk of Piecemeal Approval, Incomplete Phases

Because this is a hybrid application (part full, part outline), there is a danger that later phases are approved without full scrutiny or that required mitigations are deferred. Without strong binding conditions and assurances, incomplete or under-mitigated phases may be built, compromising environmental or infrastructural safeguards.

## **Suggested Conditions / Requirements (if permission is considered)**

If, contrary to my objections, permission is being considered, then I strongly urge the Council to require:

- Robust and independently verified flood modelling and compensation plans, including clear maintenance regimes and performance monitoring.
- Guaranteed delivery timelines (via legally binding agreements) of education, health, community, and utility infrastructure ahead of or in step with new housing occupation.
- Enlarged buffer zones, ecological corridors, and legally secured long-term habitat management (with independent oversight).
- Transport mitigation plans that ensure local roads are not overwhelmed, plus realistic modal shift strategies (safe, high-quality public transport, cycle / pedestrian infrastructure).

- Restrictive phased triggers so that no house in later phases may be occupied until all required mitigation (ecological, hydrological, transport) is fully functioning.
- Flood resilience measures (elevated floor levels, flood proofing, safe escape routes) built in as a condition, with regular audits.
- Full compliance with national policies (NPPF) and relevant local policy regarding flood risk, biodiversity, infrastructure delivery, and sustainable transport.

In conclusion, while there is a pressing need for housing, this proposal in its current form is fundamentally flawed in relation to local resource capacity, traffic and transport impact, ecological harm, and flood risk. It places undue burden on existing communities and environment, and its mitigation proposals are speculative and inadequately secured.

Accordingly, I respectfully request that permission be refused. If the Council is minded to approve, then only with the strict conditions and assurances indicated above, and only after a full reconsideration of alternatives.

Thank you for considering this objection.

I look forward to confirmation that my objection has been registered under DC/25/1312.

Yours faithfully,

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