

**From:** Planning@horsham.gov.uk  
**Sent:** 07 October 2025 13:17  
**To:** Planning  
**Subject:** Comments for Planning Application DC/25/1312

**Categories:** Comments Received

## Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 07/10/2025 1:16 PM.

### Application Summary

**Address:** Land West of Ifield Charlwood Road Ifield West Sussex

**Proposal:** Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.[cr]

**Case Officer:** Jason Hawkes

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### Customer Details

**Address:** 57 Lingfield Drive Worth

### Comments Details

**Commenter Type:** Member of the Public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:**

- Design
- Highway Access and Parking
- Loss of General Amenity

- Other
- Overdevelopment
- Privacy Light and Noise
- Trees and Landscaping

Comments: I am objecting to the West Of Ifield Development, DC/25/1312, for the following reasons.

The allocation is not proved to be deliverable.

- 3,000 or 10,000 Although this planning is for 3,000 houses, Homes England were clear (in April 2025) that full 10,000 house proposal joining Horsham and Crawley is a "Future opportunity" that is being kept under review, i.e. if the 3,000 houses are approved then planning will start for the next 7,000. So, in effect the 3,000 is the first phase of a much larger "masterplan". Horsham Council should be considering the impacts and the infrastructure needs of the full 10,000 not just the first phase in isolation.
- Homes England claim the houses are needed for Crawley residents. There is no mention of any social housing that Crawley council need, which are properties 40% cheaper than market price or rent.
- This plan is speculative as this site is not allocated to Horsham District Councils adopted local plan. Homes England said they wouldn't seek to avoid full and proper scrutiny of the local plan and yet that is exactly what they've done, this is a speculative plan. This is completely undemocratic.

Transport

I believe that that the West of Ifield is undeliverable without first building additional effective infrastructure.

- The only new road from will be from Rusper road to Ifield Avenue (exiting roughly opposite Bonnetts Lane) through the new development. No other new road infrastructure is planned. Plus Rusper Road will be 'closed off' from around the golf course area to Hyde Drive roundabout, forcing traffic to and from Rusper to take a circuitous route creating, more traffic, more road miles and killing off Rusper village and the surrounding businesses.
- At just phase one of the 3000 houses will likely mean 4200 extra cars on our roads. This will mean a significant number of extra trips a day when including school runs, getting to work, shopping, leisure etc. leading to a huge increase in traffic on roads that can't support it. Residential roads in Langley Green, Ifield and Rusper will become 'rat runs'. There will be increased traffic on A264, at Cheals Roundabout, and on the M23. Rusper and Charlwood will also see significant increased traffic flows through the lanes and village centres.
- All on top of additional traffic from continuing build-out at North Horsham and Kilnwood Vale.
- The 15 minute neighbourhood proposed by Homes England to mitigate extra traffic is set to fail as the infrastructure, such as town cycle paths needed to make it viable, does not exist. Ifield station is too far from the development to encourage people to walk, and there is little provision for cycle parking. Their plan relies on the belief that people are fit and able to use public transport or cycle, not everyone is physically able. How is it suggested that real world domestic travel fit in, how does the tradesman fit his tools and supplies on a pushbike or bus or the busy parent pick the kids up from school after doing a food shop on the bus or bicycle. These catchy titled plans need a large dose of realism added before they can be considered practical every day solutions. How are the disabled and elderly walking long distances and jumping on and off buses and trains and standing around waiting for them?
- Platforms at Ifield Station are narrow, short and very crowded at peak times. Train services from Ifield are infrequent and often cancelled, meaning some people will travel to Crawley and Three Bridges stations, further increasing congestion in those areas.

#### Air Pollution

Air quality management areas (AQMA) have been declared in Crawley along Crawley Avenue and around Hazelwick roundabout (source <https://crawley.gov.uk/environment/environmental-health/airpollution/air-quality> ) due to levels of nitrogen dioxide exceeding what is permitted. Increased traffic from West of Ifield will enter the AQMA if travelling to Manor Royal, Gatwick, the M23 etc, increasing traffic related air pollution in Crawley. Air Quality Management is required by the Environment Act 1995. We believe that policies set out in NPPF September 2023 Chapters 2 & 8 are not met.

- More traffic will lead to higher levels of traffic related air pollution (TRAP). Air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. In the short term, TRAP will have a negative effect on the lungs, blood pressure and nervous system of pedestrians.
- Long term exposure can lead to adverse birth outcomes (such as low birth weight) and

respiratory issues, contributing to an increased risk of poor health into old age and early death. It is recognised as a contributing factor in the onset of cancer.

- Those travelling within cars are also subjected to TRAP.

- Proposed new flight paths from Gatwick would increase air pollution in the West of Ifield area, causing further negative impacts the health of those in the area.

#### Gatwick noise

The HDC Local Plan does not provide sufficient detail on the negative impact that Gatwick Airport 2nd runway expansion may have on WOI in particular and Horsham district in general. NPPF September 2023 sections 174 e) and page 53 section 185 a) and b) are not adhered to for West of Ifield.

- The EEA report 'Environmental noise in Europe 2020' shows that long term exposure to noise can cause a variety of health effects, such as stress, sleep disturbance, negative effects on the cardiovascular and metabolic system as well as cognitive impairment in children.

- Notwithstanding the confirmed expansion, Gatwick flight paths are under review, which could lead to the West of Ifield development suffering increases in noises levels from today's readings of 47dB to 78dB. (Based on Cagne research). This would breach an agreement that both Horsham District Council and Crawley Borough Council's Environmental Health Officers have made with Homes England that an upper limit of a 60dB LAeq, 16hr contour cut off for sensitive development is appropriate for the site.

- Occupiers of future development would be protected by the Environmental Protection Act 1990 which amongst other things states that a statutory nuisances can constitute "noise emitted from premises so as to be prejudicial to health or a nuisance" NPPF paragraph 187 states "Planning policies should ensure that new development can be integrated effectively with existing businesses ....Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established."

- HDC Local Plan recognises the need for a full Noise Impact Assessment to identify the impact from aircraft on the WOI site. To our knowledge this has not been undertaken to date and will they account for the additional runway?

- Homes England are proposing a new school on the site, and this would require additional noise protection. We would expect this to form part of a future planning application.

#### Water

Managing clean water supply, wastewater treatment, river quality and flooding for the West of Ifield site present challenges. Present problems will be worsened by increasing the population in the area, by building on a greenfield site and by the impact of climate change. Nevertheless, HDC determined to press ahead with West of Ifield with the developers being charged with delivering the necessary mitigations. Homes England have not proven that their ideas of water neutrality are sound and deliverable. Surely before any decision is made regarding building this needs to be agreed and proven with the Environment Agency.

- Water supply is currently fragile (supplier - Southern Water). Water neutrality requires water demand in new builds to be offset against reduction of water use elsewhere and by the repair of leaks. Timetable and finances to deliver this offsetting are uncertain.

- Sewage. Without extensive improvements the Crawley wastewater treatment works (WwTW) will not be able to take further sewage. Thames Water's timetable and finances for improvements or extensions are uncertain. Crawley sewage treatment works are almost at capacity now with both Crawley Council and Thames water raising strong concerns over the Homes England proposal.

- River Quality. The River Mole will be the river that suffers. Most of it is already classified as of poor or moderate quality. Climate change will increase the likelihood of intense rainfall and frequency of combined sewage and storm water overflows into its water. Thames Water is struggling to get on top of problems now.

- Flooding. Crawley, Horley and Gatwick are subject to flooding and more tarmac in the Ifield area in place of green fields will make the situation worse. The water levels in the River Mole and in its tributaries in the local area rise rapidly at times of heavy rains; towns downstream often suffer worse flooding than Ifield and this will be increased by climate change. The width of flood plains within the West of Ifield site itself will increase with climate change. This could make floods more likely and evacuation routes more problematic.

#### Biodiversity

HDC's Local Plan looks unsound because its policies on biodiversity and nature recovery (HDC Policy 17) are weak, superficial and inconsistent given the scale of development on greenfield sites - in particular West of Ifield. NPPF September 2023 paragraphs 174, 179 and 180 are contravened.

- Sussex Wildlife Trust (SWT) told HDC in 2020 that 'the Local Plan should not be taken

forward as the significant effects on biodiversity remain unquantified and poorly understood. ... the lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue'. HDC has done nothing to assess the damage their Plan will cause to precious habitats and wildlife across the District.

- The West of Ifield 3,000 house site is rich Low Weald habitat - copses of mature Oak, Ash and Hornbeam, thick ancient hedgerows, and the river Mole and Ifield Brook. With over 30 ha of 'ancient woodland' - designated by Defra - on the site or immediately adjacent to it, plus another 30 ha of 'priority woodland'. That's why 75% of the site is identified as Biodiversity Opportunity Area. But all extremely threatened.

- Ifield Brook Meadows - designated Local Wildlife Site - will be sandwiched between the densest part of West of Ifield and the urban edge of Crawley. Homes England plans to cover it with cycleways and footpaths, and maybe even convert it into a park and playground. This means catastrophic biodiversity loss from this LWS.

- Ecologists have recently discovered colonies of rare and highly protected Bechstein's bats on and around the site, linked with colonies in Surrey. Legislation says that the area should be considered for designation as a Special Area of Conservation. This is solid evidence that SWT is right - the District's habitat is under-recorded, under-designated and under-protected. And the Bechstein's at West of Ifield are an excellent example. But HDC and Homes England are downplaying the significance of these findings and the value of the area.

- Similarly, HDC don't acknowledge that much of the Upper Mole Valley is in Ruspur parish, and that the river, hedgerows and woodland are excellent wildlife corridors up into Surrey. Wildlife doesn't respect human boundaries - but the Plan doesn't mention any collaboration with Mole Valley District Council, or the great work being done by the Gatwick Greenspace Partnership. But then HDC isn't interested in this corner of the District - so much for Wilder Horsham District!

- The West of Ifield site is Crawley's only remaining 'rural fringe' and should be protected for Crawley residents, just as Chesworth Farm is for Horsham residents. It's inconsistent and ruthless to take away from Crawley residents what Horsham is so carefully protecting for its own.

- Homes England's own ecological surveys show that the site is of high biodiversity value. Health infrastructure.

We believe that the local health infrastructure network is already under significant strain, will not cope with the impact of another 3000 houses in the area. Policies set out in Chapter 2 & 8 of the NPPF September 2023. are not adhered to by the HDC Local Plan.

- Policy HA2 requires the delivery of local healthcare facilities which as a minimum, meet the needs of the new occupants of the development which may include the appropriate provision of land, buildings and/or financial contributions and this is not accounted for in the viability study so is not deliverable.

- There is uncertainty on the possible provision of healthcare facilities on the West of Ifield development and, if provided, how they will be staffed given the national shortage of medical professionals?

- There is already difficulty in accessing existing GP services with some surgeries having been unable to accept new patient registrations. GP'S can't be found for new surgeries, new neighbourhoods such as Forge Wood and Kilnwood Vale have no medical facilities thereby creating additional pressure on other surgeries, it's virtually impossible to find dentists taking NHS patients on in the area and pharmacies continue to close in Crawley.

- East Surrey Hospital is frequently operating at maximum capacity with no available beds for patients requiring admission. No new hospitals are planned.

- There is evidence of ambulances having to wait outside the A & E department at East Surrey Hospital to transfer patients, there is frequent vehicle queuing to get into East Surrey Hospital car parks making people late for appointments and there are long waiting times for non-urgent hospital operations and treatment.

- The HDC Local Plan ignores the proven positive impact that open green space can have on residents physical and mental wellbeing and which will be impacted by the loss of rural environment if the West Of Ifield development proceeds.

Housebuilding numbers

The Plan is required to set out the Council's 30 Year Vision, but this is completely missing - probably because the Horsham District Council's Plan to build c800 new houses a year is unsustainable and cannot continue.

- Horsham now has one of the fastest rates of population growth in the south-east, only surpassed by Ashford, Maidstone and Dartford. All completely unsustainable and loading yet more pressure on water supply, sewage infrastructure, roads, hospitals, etc.

- Shockingly this growth is the result of excessive housebuilding. Deliberate over-supply, with marketing to create demand from people outside the area, investors buying to rent, and even marketing to overseas investors. As a result, over 80% of Horsham's population growth is due to people moving into Horsham - from Crawley (25% of net inward in 2019), south London, Surrey, and other south-east areas.
  - Housebuilding here has almost nothing to do with satisfying local need. If it did HDC would only build 400 a year, and a very significant number would be genuinely social housing, i.e. 60% of market rents.
  - Instead the building we get satisfies the developers' need for profit. And they won't deliver social housing, or even truly affordable housing. It's time to stop pushing so much, and the wrong type of housing into the south-east, because it's profitable for developers.
- Crawley Council is totally opposed to the plans, describing the plans as a disaster.

#### Jobs

One of HDC's justifications for placing 3000 new houses at the edge of Crawley is the availability of jobs at Gatwick and in Crawley. However:

- Gatwick is unlikely to provide these new jobs as roles continue to be lost to automation (check in/passport control/baggage handling etc).
- Plus, Gatwick jobs tend to be lower paid and not a match for the price of housing that will be delivered
- A lot of the office space in Manor Royal has been lost to warehousing. The trend for online shopping feeds this change. Warehousing jobs are also low paid and will not be a match for the housing that will be delivered.
- Crawley is struggling for space to build new workplaces, as evidenced within it's own Local Plan (Topic Paper 5 Employment Needs and Land Supply).

#### Ifield Golf Course

Paragraph 99 of NPPF September 2023 requires that a sports facility should not be built on unless it is shown to be surplus to requirements, or 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. These requirements are not met for West of Ifield.

- The Horsham Golf Supply and demand assessment December 2022 states:
  - o "Supply [in Horsham District] is currently deemed to be sufficient to meet demand; however, it is also clear that each facility is meeting a need due to current membership and usage levels.
  - o Potential future demand provides further evidence that each existing facility is required.
  - o It is unlikely that any loss of provision could be supported without appropriate mitigation being secured due to capacity pressures that would be created, despite the development aspirations that are in place.
  - o If existing development proposals and/or the potential loss of any golf provision are to be pursued, separate site-specific needs assessment studies are needed to fully determine requirements, with a full and specific focus on the site/s in question and concentration on a more closely defined and more relevant catchment area (a 20-minute drive time from the site/s).
  - o For a proposal to go ahead, any needs assessment will need to evidence that the provision is surplus to requirements or set out a mitigation proposal that replaces the supply to an equivalent or better quantity and quality in a suitable location, as per the NPPF's requirements to requirements."

- From reports received to date, Homes England are unable to prove that IGC is surplus to requirements, and they say nothing at all about alternative leisure/recreation facilities to compensate for the loss of Ifield Golf Club, as required under Para 99.

- The four main tests of whether a course is surplus are quantity (supply of 'golf' in the area), quality (of the course and facilities), accessibility (population within 20 minute drive) and availability (open for new members), and our objections should be based on these. Ifield Golf Club is a very high quality course, and members cannot relocate due to a lack of availability at other high quality courses. Ifield Golf Club's quality can be evidenced by the standard and number of competitions it hosts.

- Ifield Golf Club is the only members club in Crawley and is used by c500 golfing members as well as 3940 green fee players and 1485 society players who visited Ifield Golf Club last year. All these players would need to relocate if Ifield Golf Club is lost, but there is a serious lack of high-quality golf in the area. Copthorne has only 50 vacancies and Cottessmore is almost full and only offering country club membership. In fact if plans for housing at Cottessmore go ahead then Ifield would be needed for displaced golfers.

- Tilgate golf course doesn't satisfy the needs of Crawley residents and has made no inroads into Ifield's membership after 50 years despite Ifield Golf Club being under threat recently.

- Ifield Golf Club is a valuable asset for a wide range of people, especially seniors, to maintain good physical health and mental wellbeing.

#### Heritage

Heritage Assets are historical features that are valued. West of Ifield is an intrinsic part of the old parish of Ifield, of which Ifield Village (which happens to be on the Crawley side of Ifield Brook and River Mole to the north) is the centre. In character the village and the site are an organic whole. The building of a school, modern housing estate and a multimodal road across this greenfield site abutting a conservation area and on the border of a Post War New Town does not take account of "the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring" (NPPF 190 b)). Neither does it take account of the role that this plays in local people's wellbeing (NPPF 92).

- Ifield Court Farm (part of West of Ifield) is a heritage asset of local historic interest, the fields of which will be lost. It has been farmed since at least the 14th century as have adjoining farms. The network of ancient footpaths linking the farms and neighbouring settlements is a heritage asset much valued and much used by people today. The network allows circular walks from Ifield Village to neighbouring farms and villages with little need for road walks.

- The pattern of small fields, thick hedgerows, shaws and patches of ancient woodland are typical of the historical landscape fashioned for centuries by agricultural practice in the low weald. The field shapes of Ifield Court Farm coincide, with few exceptions, with those of the tithe maps of 1841 and are probably much older: the hedgerows are therefore ancient and rich in biodiversity. Many will be lost.

- Ifield Village for many centuries, lay at the centre of a rural parish. The village, now a conservation area, retains evidence of its rural routes by adjoining Ifield Court Farm. To replace the farm with a modern housing estate and a multimodal road through it is to remove that part of history.

- Nearly 100 year Ifield golf course - opened in 1927, was commissioned by the then Lord of the Manor, Sir John Drughorn, and constructed by architects Hawtree and Taylor. It is a particularly well designed course which took account of the natural features; many more trees were planted at the Millennium. It has social, cultural and health benefits for many people.

- Town within the country - Ifield remains the one location in Crawley where the New Town concept of a town within the country is a reality. This is a heritage asset to be retained.

- Archaeological assets are likely to be abundant as the land has been occupied since Anglo-Saxon times or even earlier. Geophysical data suggests "the remains of a probable large settlement site spanning from the Late Bronze age to the later Roman Period as well as a number of other possible Prehistoric/Roman enclosures". It's also likely that an archaeological survey would reveal artefacts from the flourishing iron industry of the 15th and 16th centuries or even of the Civil War skirmishes that resulted in the destruction of Ifield forge in 1643.

The plans are going to destroy so much in and achieve so little in comparison. Once this land has gone it has gone for ever. The flooding on new build sites across the country shows how little attention has been paid to impact of concreting over huge areas of land that currently naturally deal with rain water in an effective way allowing it to soak into the land. Ifield Brook and its numerous small drainage channels and tributaries are regularly full as it is. Please do not allow this application to go ahead.

  
Reference DC/25/1312

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Kind regards

Telephone:

Email: [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)



**Horsham  
District  
Council**

