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**Sent:** 28 November 2025 20:45  
[REDACTED]

**Subject:** LETTER SUBMISSION: SEVEN REASONS WHY HOMES ENGLAND'S WEST OF IFIELD MASTERPLAN IS NOW 'DEAD IN THE WATER'

## SEVEN REASONS WHY HOMES ENGLAND'S WEST OF IFIELD MASTERPLAN IS NOW 'DEAD IN THE WATER'

Dear Editor,

Gatwick Airport Ltd's [GAL's] forensic objection to Homes England's West of Ifield planning application (DC/25/1312) is a game-changer and show-stopper rolled into one - effectively rendering the masterplan 'dead in the water'.

Their professional assessment — covering airport safeguarding, noise, highways, water, flood risk and national policy — makes clear this speculative masterplan cannot proceed without serious consequences, especially regarding safety.

Here are seven reasons why the planning application of this government master-developer is now 'dead in the water'.

### **1. It breaches airport safeguarding rules — making approval impossible**

GAL state plainly that the application "has been found to conflict with safeguarding criteria" and that planning permission should not be granted in its current form (page 4) .

Building heights and proposed landscaping would infringe protected airspace and create unacceptable bird-strike hazards. These are not minor technicalities — they are legal red lines.

### **2. It conflicts with land safeguarded for a future southern runway**

Gatwick reiterates that Government policy has safeguarded land south of the airport for over 20 years, and that this safeguarding was fully upheld by the 2024 Crawley Local Plan Inspector (pages 2–3) .

Homes England's plans would place thousands of new residents directly under noise contours that assume this future runway — a runway Gatwick explicitly states it still intends to deliver.

### **\*\*3. Noise impacts on all 3,000 homes are significant and unavoidable**

GAL's noise analysis is devastating. Under the safeguarded Southern Runway scenario, all proposed homes fall above the LOAEL [Lowest Observed Adverse Effect Level], with housing exposed to levels 3–9 dB above acceptable limits (page 7) .

GAL concludes there are no mitigation measures available to prevent "significant adverse effects" on residents — including schools, gardens and open spaces.

This single finding alone is enough to stop the masterplan.

### **4. Gypsy & Traveller sites are placed in unacceptable noise zones**

GAL highlight that the proposed Gypsy & Traveller sites fall within the 54–57 dB noise exposure zone, where even Homes England admit that proper sound insulation cannot be provided (page 9) .

GAL conclude the sites are “not appropriate” — again, making approval impossible.

#### **5. Highways modelling is unreliable and congestion will worsen**

GAL criticise the transport modelling as out of date, incomplete and insufficiently validated, noting that key junctions (including the A264 and Ifield Avenue) are shown in Homes England’s own data to be over capacity even before the 3,000 homes are added (pages 21–22) .

GAL state that no decision can lawfully be taken without substantial new modelling.

#### **6. Flood risk, River Mole hydrology and water infrastructure issues remain unresolved**

GAL note that the Environment Agency has already objected, and ask fundamental questions about drainage times, culverts, and interaction with the Northern Runway Project’s River Mole works (page 10) .

Thames Water also warn of inadequate wastewater capacity.

GAL recommend a Grampian condition — effectively preventing any development until major infrastructure issues are resolved.

#### **7. The Bird Hazard Management Plan itself shows the development is unsafe**

The Bird Hazard Management Plan — included as a 5-page appendix — reveals the extraordinary level of risk the development poses to aircraft (pages 26–30) .

Daily monitoring, nest removal, drainage of puddles, removal of stockpiles, roof inspections and perpetual enforcement are all required.

This is not sustainable, realistic, or compatible with safe aviation operations — and Gatwick is explicit that it cannot approve the site unless these risks are eliminated.

#### **Conclusion**

Gatwick Airport Ltd’s objection leaves Homes England’s West of Ifield masterplan with no legal, environmental or operational path forward.

Noise, safeguarding, highways, flood risk, bird hazard and national policy conflicts mean the proposal is undeliverable in principle, not merely in detail.

West of Ifield is the wrong place for this massive speculative development — and Gatwick’s own evidence now confirms it.

Yours sincerely

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# GATWICK AIRPORT LTD SAYS NO WEST OF IFIELD PLAN IS 'DEAD IN THE WATER'

## 7 Reasons Why Homes England's Speculative Plan Cannot Proceed



### 3 Unavoidable Noise Harm to All 3,000 Homes

GAL: all homes would face **significant adverse effects**, with no mitigation possible.

### 4 Gypsy & Traveller Sites in Unacceptable Noise Zones

GAL: Locations "not appropriate" – even insulation cannot make them safe.

### 1 Aerodrome Safeguarding Breached

GAL: the application "conflicts with safeguarding criteria" – permission **cannot** be granted  
(DC728/1872 :GAL Letter, 20 Nov 2025)

### 2 Future Southern Runway Safeguarded

Government policy still protects land south of Gatwick for expansion. Homes England's plan sits under those noise contours.

### 4 Highways Modeling Fails

Key junctions already over capacity,

### 5 Flood, Water & River Mole Risks Unresolved

Environment Agency objects.  
Thames Water warns of insufficient capacity.  
GAL: Development cannot proceed without major redesign.

### 7 Bird Hazard Threat to Aircraft Safety

GAL's own Bird Hazard Plan shows constant, perpetual management required – an unsafe and unsustainable location next to an international airport.



**CONCLUSION**  
**WEST OF IFIELD IS THE WRNG PLACE.**  
**THE APPLICATION IS UNDELIVERABLE.**  
**THE SCHEME IS FINISHED.**