
Sent: [REDACTED] 20 October 2025 19:41
To: Jason.Hawkes
Cc: Planning
Subject: SECTION 106 - PRoW - IFIELD BROOK MEADOWS
Categories: Comments Received

20 October 2025

Jason Hawkes
Planning Officer
Horsham District Council
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Subject: Formal Concern – “Off-site PRoW Contribution” Clause in Homes England’s Section 106 Draft Heads of Terms (West of Ifield Planning Application)

Dear Jason Hawkes

I write on behalf of The Ifield Society to raise serious concerns regarding the “Off-site Public Right of Way (PRoW) Contribution” contained within Homes England’s Section 106 Draft Heads of Terms (Document: WOI-HPA-DOC-HOT-01, Rev [04 – 13/08/2025](#)) for the speculative West of Ifield development.

This clause states:

“Off-site PRoW contribution
(separate to any onsite
reinforcement or enhancement).

Trigger point to be agreed with WSCC / LPA. Financial contribution.”

While this wording may appear routine, it raises several material concerns of both legal clarity and public accountability.

1. Unclear Scope and Location

- No details are provided regarding which specific footpaths, bridleways or parish routes will be affected, diverted or “improved”.
- This lack of transparency risks undermining the integrity of Ifield’s ancient public rights of way, including those through Ifield Brook Meadows and the Ancient Parish of Ifield.

2. Deferred or Non-enforceable Obligations

- The phrase “Trigger point to be agreed” leaves the timing and enforceability of any payment or work uncertain.
- Without a fixed date or phase trigger, the contribution could be delayed or reduced, weakening public benefit commitments.

3. Offsetting Instead of Protection

- Financial “contributions” risk being used to offset environmental and heritage damage rather than to prevent it.
- This is contrary to the principles of sustainable and community-led development outlined in the National Planning Policy Framework and the Dasgupta Review on biodiversity and economic value.

4. Fragmentation of the Ancient Parish Landscape

- The proposed off-site PRoW works could fragment or urbanise the historic landscape character of the Ancient Parish of Ifield, in conflict with both Horsham’s Local Plan and Crawley’s adopted Local Green Space designation covering Ifield Brook Meadows.

Given these points, I respectfully request that Horsham District Council:

- Seek full disclosure from Homes England regarding the intended location, amount, and purpose of this “Off-site PRoW contribution”;
- Require binding triggers and enforcement mechanisms prior to any outline or hybrid consent;
- Ensure public consultation and scrutiny on all PRoW changes affecting Ifield Brook Meadows and adjoining parishes;
- Confirm that this contribution will not be used to justify or mitigate unacceptable landscape and heritage harm.

The community has a moral and civic responsibility to safeguard the Ancient Parish of Ifield and its rights of way — which form part of the cultural and ecological heritage of North Sussex.

Yours sincerely,



Co-founder, The Ifield Society

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