

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 21 January 2026 16:29:40 UTC+00:00
To: "Planning" <planning@horsham.gov.uk>
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 21/01/2026 4:29 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

[Click for further information](#)

Customer Details

Address: 6 Friston walk Ifield Crawley

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Objection

I hope that the comments from the public are taken seriously and not treated as a public consultation exercise. Thank you.

In response to the Inspector's letter dated 6 January 2026, it is untenable to suggest that Homes England's West of Ifield proposal can be properly, robustly, or lawfully assessed at this stage.

Critical and unresolved questions remain regarding the timing, location, and scale of additional housing, and-most importantly-the delivery, funding, and phasing of the necessary supporting infrastructure. The completion of the full CMMLC is central to these considerations and must be prioritised, clearly defined, and evidenced before any further large-scale development proposals can be meaningfully assessed.

Should the proposal for up to 10,000 dwellings west of Ifield be brought within the scope of this Local Plan, it would constitute a fundamental and material change to the plan strategy. As such, it would require a fresh, comprehensive, and transparent public consultation process.

Any attempt to reach a decision on development at West of Ifield in the absence of an adopted, up-to-date Local Plan would be premature, procedurally flawed, and incompatible with democratic decision-making and sound plan-making principles.

Horsham Local Plan Inspector's letter - 06/01/2026

In exploring the feasibility and practical arrangements of progressing the

Examination, it is important I make clear to the Council that my role is to

examine the Plan and manage the Examination. Whilst I am able to

recommend main modifications to the Plan for soundness or legal compliance

reasons, it is the Council's role to decide on an appropriate development

strategy for its area and prepare a sound and legally compliant Local Plan

engaging with all interested parties as appropriate. It is therefore for the

Council to set out how it wishes for the Plan to be modified and explain to me

how that can reasonably be achieved during the Examination in a

timely manner that is fair to all interested parties. In managing the Examination, I will need to decide and keep under review, whether the scope of any work necessary and its associated timescale for completion is appropriate having regard to legal requirements, national policy and pertinent Government statements and written correspondence. Soundness concerns so far 7. 8. 9. As you acknowledge, the Plan sets a housing requirement which would not meet the local housing need of the district calculated using the standard method. Based on the latest assessment before the Examination it falls short by some 2,275 dwellings. The Council's justification for this fundamentally relies on evidence related to water neutrality and market deliverability/capacity²

The same evidence was factored into the Council's sustainability appraisal³ of alternative housing requirements and spatial strategy options and informed the selection of the preferred strategy and sites for allocation in the Plan.

Issues associated with water neutrality have clearly created extremely difficult plan preparation conditions for the Council. However, for the reasons I gave in ID08, limiting or capping the number of homes to be provided in the district or ruling sites out for allocation in the Plan at any stage of plan making for reasons relating to water neutrality was and is unsound. Natural England's withdrawal statement (HDC44a) now makes this situation clear. The Council's evidence on market capacity is primarily a review of historical market performance in the district without any substantive consideration of the wider relevant housing market areas. It seems to test, among other things, the deliverability of the Council's housing requirement as detailed in the Plan. It

1 Provisional Hearing Programme (ID05). Weeks 2 to 4 were cancelled having completed week 1.

2 Housing Delivery Studies (H02 dated September 2020 and H03 dated November 2023)

3 SD03a to SD03d and associated non-technical summaries.

2 does not substantively consider any significantly higher levels of development which could meet or exceed local housing need or any housing market influences from settlements outside of the Horsham district boundary in any significant robust detail. Therefore, this work also does not provide robust evidence to demonstrate that the level of development provided in the district should be restricted or reduced to a figure below local housing need or any other level, particularly, against the background of an acute national housing crisis.

10. There does not seem to be any other evidence before the Examination which could give justified reasons (environmental or otherwise) that provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area (NPPF, paragraph 11). Thus, overall, the Plan's vision, objectives and spatial strategy are not effective in meeting the housing needs of the area. They are not justified by evidence and are not consistent with national policy or positively prepared and the Council's sustainability appraisal is not robust.

The scope of any main modifications and timescales for developing them

11. The existing evidence indicates to me, that the Plan should provide for at least the districts minimum local housing need based on the standard method.

12. I acknowledge that the Council, through a high level review of its trajectory suggest that it can as a minimum meet its own need as an annualised figure of 965 homes per annum through delivering more on sites already identified in the Plan and new site allocations. However, it must also be considered whether the Plan's housing requirement should include an unquantified contribution towards substantial unmet needs arising from neighbouring areas. Historically, Horsham district has made contributions towards meeting unmet needs arising from other local authority areas, particularly those arising from Crawley. Horsham's relationship with Crawley is not adequately recognised

in the Plan's spatial strategy.

13. As you acknowledge in your latest letter, a sufficient supply of sites would need to be provided to ensure any increased housing requirement could be met and it will need to be considered whether additional sites need to be allocated for housing development in the Plan through main modifications. However, I must remind the Council, that I have not yet considered all the sites (including their potential yields) which are already proposed for allocation in the Plan at a hearing and some of those sites are subject to numerous representations opposing them. Furthermore, if new allocations are required as you indicate would be necessary through main modifications, there are numerous alternative sites being promoted for development in the district which are not currently included in the Plan.

14. Thus, clearly main modifications will be necessary to increase the housing requirement in the Plan and amend the spatial strategy. However, it is not obvious to me, how the housing requirement and spatial strategy should be modified and which additional sites should be allocated if they are required.

315. If the Examination is to proceed, a full review of the sustainability appraisal (overall requirement, spatial strategy/distribution option and site options appraisal) and new/updated evidence all seem necessary. If new site allocations are necessary, the Council would need to develop an appropriate methodology/process for selecting new sites and discounting those not selected. In the interests of fairness, the Council would need to explain to me how interested parties, particularly local communities and site promoters would be engaged in the extensive programme of work that would seem to be required to achieve a sound and legally compliant local plan.

16. I will need to consider whether the substantive main modifications which could be needed to make the Plan sound, if that is possible, could be regarded to be

of such scope that the Plan is fundamentally unsound. Furthermore, accounting for further hearings, new and updated evidence and consultation, I would also need to understand from the Council whether there would be a significant risk that the Examination would continue for an unreasonable length of time.

Conclusion

17. I hope this letter is helpful for the Council to prepare for the meeting. To assist the effectiveness of the meeting, please can the Council provide an initial response to this letter and an updated housing land supply position (including a five-year housing land supply calculation) by no later than 12 February 2026.

That initial response should outline as far as possible a draft programme of works (timetable and scope) which the Council consider would be necessary to progress the Examination and achieve a sound plan as indicated in your letters.

18. I appreciate this deadline may be challenging, if you are unable to meet it, please can you let me know via the Programme Officer accordingly. I am also happy to provide any necessary clarification on the contents of this letter via the Programme Officer in the lead up to the meeting. However, I do not require a response to this letter from representors at this time.

L Fleming
INSPECTOR

Kind regards

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