

27 Gossops Green Lane
Crawley
RH11 8BJ

04/10/2025

Subject: Objection to Planning Application DC/25/1312— West of Ifield Hybrid Application

Dear Mr Hawkes,

I'm writing to object to planning application DC/25/1312 for West of Ifield for the following planning reasons:

Herigate:

- 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 multi-modal 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 Wol) 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 Warskirmishes that resulted in the destruction of Ifield forge in 1643.

Traffic:

I am convinced that the western part of Ifield cannot be developed without first enhancing the necessary infrastructure, and I also believe that the policy criteria laid out in Chapters 2 and 9 of the National Planning Policy Framework (NPPF) from September 2023 have not been satisfied.

- The proposed housing development in Ifield West will result in a considerable influx of additional vehicles and daily trips, including those for school pickups, commuting to work, shopping errands, and leisure excursions, leading to a substantial increase in traffic on roads that are incapable of managing it. This surge will inevitably cause heightened congestion and delays throughout our local roadways and will funnel more traffic through the narrow lanes of villages such as Langley Green, Ifield, and Rusper. Neighbourhood streets in the adjacent areas will transform into shortcuts for commuters. There will be more vehicles on the A264, at Cheals Roundabout, and on the M23. Moreover, Charlwood will also experience a notable rise in traffic passing through the village. This additional traffic will directly impact safety conditions. In my vicinity around Tangmere Road, Overdene Drive, and Ifield Drive, construction vehicles will create considerable delays, making it increasingly difficult to turn right onto Overdene Drive, especially during school drop-off times. I contend that safety issues for pedestrians in this locale are also a significant concern. Schoolchildren cross at the mini roundabout linking Overdene Drive and Gossops Green Drive, and there are already issues here; the influx of construction traffic will only worsen the situation.
- We must also consider the ongoing construction activity in Kilnwood Vale and North Horsham and its ramifications for traffic levels. The access roads to the 'C' roads are too narrow, resulting in additional cut-throughs in other areas, and simple calming measures will not address these issues adequately.

- The proposed solutions outlined by Homes England lack sufficiency. The assumption that individuals will refrain from driving due to the availability of cycle paths and public transportation is entirely unrealistic and unsupported by any substantial evidence. The existing bus services are inadequate, and cycle paths in Crawley are underutilised. People prefer to drive because it is faster, more economical, and more convenient. While I agree that we need to lessen reliance on private cars, significant improvements to public transport are essential for that to become a reality, regardless of any proposed mitigations.
- Ifield station is situated too far from the new development to motivate residents to walk, which means they will likely drive there and park in nearby residential neighborhoods, exacerbating the transport issues in this area. This situation will have a direct impact on those of us living in that area. Train services departing from Ifield are infrequent, leading some commuters to travel to Crawley and Three Bridges stations, which will further add to the congestion in those locations. Traffic in Crawley Town Centre and at Three Bridges is already slow, contributing to escalating air pollution. As someone with asthma, I have already started to notice a decline in my respiratory health while walking in this area, and the situation will only deteriorate.
- Traveling to Rusper from Ifield will take longer if Rusper Road is closed, which will lead to increased pollution and extended travel times.
- Additionally, there is a lack of suitable facilities for bicycle parking proposed.

Pollution:

In Crawley, specific areas have been designated as air quality management areas (AQMAs), specifically along Crawley Avenue and surrounding the Hazelwick roundabout, due to nitrogen dioxide levels that surpass the legally allowed limits (source: <https://crawley.gov.uk/environment/environmental-health/airpollution/air-quality>). As traffic increases from the West of Ifield towards locations like Manor Royal, Gatwick, and the M23, this will lead to more vehicles entering the AQMA, thereby heightening traffic-related air pollution in Crawley. The necessity for Air Quality Management is mandated by the Environment Act of 1995. I am concerned that the guidelines laid out in the National Planning Policy Framework (NPPF) of September 2023, particularly in Chapters 2 and 8, are not being adhered to.

- As highlighted previously, individuals suffering from respiratory illnesses already face challenges due to air pollution in heavily trafficked areas of Crawley. The proposal for the construction of an additional 3000 houses will undoubtedly lead to a further increase in traffic, which in turn will exacerbate air quality issues. It is unclear how Homes England plans to alleviate this situation, as the introduction of more residential properties in proximity to Crawley is likely to result in a higher volume of cars on our roadways.

- Additionally, the proposed flight paths from Gatwick Airport are anticipated to contribute even more to air pollution in the West of Ifield region, thereby posing additional health risks to residents living in that area.
- Homes England have presented various ways in which they believe they can achieve water neutrality, but there are too many uncertainties with all of them. Such a big issue should have been resolved before application. They believe they can meet the water neutrality requirements by harvesting rainwater and extracting groundwater through boreholes, but the Environment Agency has yet to report on whether this is feasible and sustainable, and whether they will grant a licence for the groundwater extraction. This should have been sorted pre-application.

Water:

There are significant concerns regarding the difficulties associated with providing clean water, managing wastewater, ensuring the quality of local rivers, and dealing with flooding issues in the West of Ifield area. The growing population in this region will only exacerbate these problems, and constructing on a greenfield site will lead to severe consequences due to climate change. Although developers are tasked with implementing essential strategies such as rainwater harvesting and drilling boreholes, there appears to be limited evidence to support the sustainability of these measures, and it is evident that the feasibility remains uncertain.

Flooding and drainage

- The areas of Crawley, Horley, and Gatwick are prone to flooding, and replacing green fields with more tarmac in the Ifield region will inevitably worsen this situation. During heavy rainfall, the water levels in the River Mole and its local tributaries can rise swiftly; consequently, towns located downstream often experience more severe flooding than Ifield, a condition likely to worsen with climate change. The dimensions of the flood plains within the West of Ifield site itself will expand due to climate change, potentially leading to an increased likelihood of flooding and complicating evacuation routes. And in the event that the dam at Ifield Mill pond were to fail...!

River Quality

- The River Mole is likely to suffer significantly. A large portion of it is already deemed to be of poor to moderate quality. The impacts of climate change will heighten the chances of intense rainfall and the frequency of combined sewage and stormwater overflows contaminating its waters. Thames Water is currently struggling to manage existing problems.
- Sewage management is a critical issue, as Thames Water is already operating at full capacity. Questions arise regarding how the capacity can be

expanded and whether an environmental impact assessment has been adequately conducted. Despite the considerable uncertainties surrounding climate change, Homes England appears optimistic about their proposals for high-end landscaping and drainage systems designed to control surface water runoff.

- Homes England has put forth various methods that they believe will allow them to achieve water neutrality; however, there are numerous uncertainties associated with each one. Such a significant issue should have been addressed prior to the application process. They assert that they can satisfy water neutrality requirements through rainwater harvesting and groundwater extraction via boreholes, but the Environment Agency has yet to provide a report on the feasibility and sustainability of these plans, nor have they indicated whether a license for groundwater extraction will be granted. This matter should have been resolved before the application was submitted.

Biodiversity:

The Local Plan put forth by HDC appears flawed as its strategies concerning biodiversity and nature recovery (HDC Policy 17) are inadequate, simplistic, and contradictory, particularly considering the extensive development planned for greenfield sites, especially in the West of Ifield area. This situation breaches several sections of the NPPF from September 2023, specifically paragraphs 174, 179, and 180.

Contravenes paragraph 2.8.C of the NPFF - an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- In 2020, Sussex Wildlife Trust (SWT) advised HDC that the Local Plan should not proceed because the significant impacts on biodiversity have not been quantified and are poorly understood. The insufficiency of current information regarding the ecological assets in the District, especially concerning broader ecological networks, worsens this problem. HDC has failed to evaluate the harm that their Plan could inflict on vital habitats and wildlife throughout the District.
- The proposed site for 3,000 houses in West of Ifield is a rich habitat belonging to the Low Weald, featuring clusters of mature Oak, Ash, and Hornbeam trees, dense ancient hedgerows, and the river Mole along with Ifield Brook. With more than 30 hectares of 'ancient woodland'—as designated by Defra—located on or adjacent to this site, plus an additional 30 hectares of 'priority woodland,' it's clear why 75% of this location is marked as a Biodiversity Opportunity Area. However, this area faces significant threats.

- Ifield Brook Meadows, recognised as a Local Wildlife Site, will be squeezed between the most densely populated part of West of Ifield and the urban boundary of Crawley. Homes England intends to overlay the area with cycleways, footpaths, and possibly even transform it into a park and playground. This development would lead to devastating losses in biodiversity from this Local Wildlife Site.
- Recently, ecologists uncovered colonies of the rare and highly protected Bechstein's bats in and around this site, which are connected to colonies in Surrey. Legally, this area should be considered for designation as a Special Area of Conservation. This presents substantial evidence supporting SWT's claims that the District's habitats are under-recorded, insufficiently designated, and inadequately protected. The presence of Bechstein's bats at West of Ifield exemplifies this situation. Nonetheless, HDC and Homes England are minimizing the importance of these findings and the area's ecological value.
- Moreover, HDC fails to recognise that a significant portion of the Upper Mole Valley falls within Ruisper parish. The river, hedgerows, and woodlands serve as prime wildlife corridors extending into Surrey. Wildlife does not acknowledge human borders; however, the Plan does not mention any cooperation with Mole Valley District Council or the vital efforts being made by the Gatwick Greenspace Partnership. HDC seems disinterested in this area of the District, undermining the aspirations for a Wilder Horsham District.
- The West of Ifield site represents Crawley's last remaining 'rural fringe' and ought to be preserved for the benefit of Crawley residents, similar to how Chesworth Farm is safeguarded for those living in Horsham. It is both inconsistent and merciless to deprive Crawley residents of what Horsham meticulously protects for its own citizens.
- Homes England have presented various ways in which they believe they can achieve water neutrality, but there are too many uncertainties with all of them. Such a big issue should have been resolved before application. They believe they can meet the water neutrality requirements by harvesting rainwater and extracting groundwater through boreholes, but the Environment Agency has yet to report on whether this is feasible and sustainable, and whether they will grant a licence for the groundwater extraction. This should have been sorted pre-application.

Health Service implications:

The NHS is currently struggling to cope, with GP hospitals and ambulances unable to keep up with the workload, so such a vast increase in numbers will be to the detriment of all. NHS dentist appointments are impossible to find, unless you have been a long term patient.

Housing tenure:

It's claimed that the houses are needed for Crawley residents. But there's no mention of any of the social housing (40% cheaper than market price or rent) that Crawley Council needs. The so-called "affordable" housing will not help.

Protecting Green Belt land:

It appears to me that most of Chapter 13 of the NPFF will be compromised by the planning application.

For these reasons, I respectfully urge Horsham District Council to refuse this hybrid planning application.

Yours sincerely,

