

Sent: 22 October 2025 16:05
To: Jason.Hawkes
Cc: Planning
Subject: FURTHER OBJECTIONS TO DC/25/1312 - WEST OF IFIELD

Categories: Comments Received

To: Jason Hawkes, Principal Planning Officer
Horsham District Council
Subject: Objection – Application DC/25/1312 (Land West of Ifield – Homes England)

From: Richard W. Symonds
The Ifield Society

Dear Jason Hawkes,

I wish to register my formal objection to the above hybrid application by Homes England for up to 3,000 dwellings at Land West of Ifield.

While the submission is extensive, it leaves major uncertainties that go to the heart of lawful and sustainable decision-making under the Town and Country Planning Act 1990, the Environmental Impact Assessment Regulations 2017, and the National Planning Policy Framework (NPPF).

Seven specific issues require urgent clarification before any determination:

1. Cumulative Effects / Prematurity

The Environmental Statement assesses only the “3,000-home phase”, ignoring the well-documented 10,000-home concept identified in earlier Homes England publicity and the 2021–23 Sustainability Appraisal. This risks prejudging the emerging Local Plan and failing to assess cumulative impacts.

2. Biodiversity Net Gain (BNG)

Homes England claims “60 % of the land” will deliver BNG, yet provides no published Metric 4.0 calculations, off-site unit agreements or phasing plan. Please require full BNG spreadsheets and binding Section 106 commitments before determination.

3. Water Neutrality

The Water Neutrality Statement (WOI-HPA-DOC-WNS-01) lacks transparent data on per-capita consumption, offset sources, and extraction licensing. The Council must confirm compliance with the Sussex North SoCG and secure offset delivery prior to occupation.

4. Wastewater Capacity

Thames Water’s treatment plant is acknowledged to be near capacity. Please publish capacity letters and insert Grampian conditions preventing occupation until network upgrades are operational.

5. Transport and Modal Shift Assumptions

The Traffic Assessment relies on an optimistic modal shift to buses and cycling without firm delivery mechanisms. Release the full model files and show how mode-share targets will be enforced if uptake fails.

6. Heritage and Landscape Setting

The Environmental Statement labels impacts on St Margaret's Church and Ifield Court Moat as "moderate" and "not detrimental." That underplays the loss of historic context and tranquillity. Verified day/night viewpoints and noise assessments should be required.

7. Coalescence and Policy Conflict

The proposal breaches HDPF Policies 26 and 27 by eroding the countryside gap between Crawley and Ifield. Such harm is significant and demonstrable and therefore cannot be outweighed by claimed housing benefits under NPPF 11 (d).

Until these matters are transparently resolved and independently verified, any approval would be unsound, premature and contrary to lawful process. I therefore urge Horsham District Council to refuse or defer the application pending full compliance with statutory requirements.

Yours sincerely

[REDACTED]
The Ifield Society

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