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Worth  
Crawley  
RH10 7YE  
26 September 2025

Dear Mr Hawkes

Objection to Homes England Planning Application DC/25/1312 - West of Ifield

I am writing to object to Homes England Hybrid Planning Application DC/25/1312 - West of Ifield because it is unsound in terms of the National Planning Policy Framework for the following reasons:-

**Ifield Golf Course**

Paragraph 99 of NPPF 2021 requires that a sports facility should not be built on unless it is shown to be surplus to requirements, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

National Planning Policy Framework (NPPF).

Paragraph 103 states that: Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be **surplus to requirements**; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Homes England have already admitted that they cannot prove that Ifield Golf course is surplus to requirements (a) so they have opted for mitigation (b).

Their mitigation is very weak, does not in any way replace the loss of Ifield Golf Course and consists solely of injecting money into Rookwood Golf course, Tilgate Golf Course and Goffs Park Pitch and Putt. FMG Sport and Leisure Consultants, acting for Homes England, have published a speculative report, Potential Golf Investments following the closure of Ifield Golf Course.

Both Rookwood and Tilgate Golf Course suggested have multiple public right of ways across the course making it dangerous for all concerned.

Both car parks and club houses are too small to accommodate potential new members from Ifield.

Significant investment to drainage, club house space including food and beverages would be required to bring it up to the standard of Ifield Golf course which was designed by 5 time Open Champion JH Taylor, a truly wonderful historic parkland course, which will celebrate its Centenary year in 2027.

In recent years a number of golf courses have closed in our area, West Chiltington, Rusper, Redhill & Reigate. Horsham Golf and Fitness have also announced that they won their legal challenge in the courts to close their 18 holes. There have also been a reduction of holes at Mannings Heath,

Cottesmore and Gatton Manor have also announced they have applied for a change of use so yet another closer which represents a significant number of holes lost to the area totalling 117, with this magnitude of losses there just simply isn't enough availability.

Ifield Golf Club is a thriving members club with 582 members which includes a good junior section, an ever increasing intermediate section - 19 to 40 year olds and a seniors section of around 140 members together with a thriving ladies section. We can't be absorbed into other clubs as most are full with waiting lists.

Currently over 30,000 rounds of golf are played annually at Ifield and there are insufficient courses locally to absorb those potentially lost rounds.

We have over 80 visiting societies annually with many of them raising money for local charities. The estimated figure is around [REDACTED] to charities such as Crawley Autism Society, St Catherines Hospice and Macmillan Cancer Support.

Our facilities are used by local residents for Wedding receptions, Wakes, special anniversaries and parties on a regular basis.

### Health Infrastructure

The local health infrastructure is already under very significant strain, as my family has had to witness recently and will not cope with the number of new homes being proposed. Policies set out in Chapter 2 & 8 of the NPPF 2021 are not adhered to by this Hybrid Planning Application.

East Surrey Hospital is nearly always operating at maximum capacity with no available beds for patients requiring admission as myself [REDACTED] have experienced several times since 2023.

Whilst waiting at the hospital myself [REDACTED], I have personally witnessed ambulances having to wait outside the A & E department at East Surrey Hospital to transfer patients. There is nearly always vehicles queuing to get into East Surrey Hospital car parks making people late for appointments and there are long waiting times for non-urgent hospital operations and treatment.

There are no new hospitals planned in Homes England submission.

There is already difficulty in accessing existing GP services, with some surgeries having been unable to accept new patient registrations and dentists taking on NHS patients. GP's can't be found for new surgeries, new neighbourhoods such as Forge Wood and Kilnwood Vale have no medical facilities thereby creating additional pressure on existing stretched surgeries, again there are no new facilities proposed in Homes England submission.

Their Hybrid Application totally ignores the proven positive impact that open green space can have on residents physical and mental wellbeing. This will be impacted by the loss of both rural environment and Ifield Golf club if the West of Ifield development proceeds.

### Water

Managing the supply of clean water, wastewater treatment and flooding already present real challenges in the area.

The problems will be made worse by significantly increasing the population in the area, by building on a flood plain which previous Horsham Plans have stated that is not suitable for building purposes. Never the less Homes England now seem determined to go ahead with the West of Ifield

development on a totally unsuitable site with the developers being responsible for the delivering the necessary mitigations.

Our Water supply is already very fragile (supplier – Southern Water) who advertise constantly for users to conserve their water usage in order for them to maintain supplies to households.

Water neutrality requires water demand in new builds to be offset against reduction of water use elsewhere and by the repair of leaks. No new reservoirs have been in my 60 years plus of living in the area. There is no timetable or plan or the will to deliver such a basic requirement because no one is prepared to pay for the infrastructure.

The recent heavy rainfall which, we now experience every year results in flooding. Crawley and particularly Ifield, Horley and Gatwick are subject to flooding and more tarmac in the Ifield area in place of green fields will make the situation worse. The water levels in the River Mole and in its tributaries in the local area rise rapidly at times of heavy rains; towns downstream often suffer worse flooding than Ifield and this will be increased by climate change. The width of flood plains within the West of Ifield site itself will increase with climate change. This could make floods more likely and evacuation routes more problematic.

### Sewage

Without extensive improvements the Crawley wastewater treatment works (WwTW) will not be able to take further sewage. Thames Water's timetable and finances for improvements or extensions are uncertain because they are basically bankrupt, it is therefore likely the River Mole that will suffer. Most of the river is already classified as of poor or moderate quality. Climate change will increase the likelihood of intense rainfall and frequency of combined sewage and storm water overflows into its water. Thames Water are struggling to get on top of problems in the current set up. No new developments should be allowed until such time as the authorities work with Thames Water to agree a timetable for when they are able to upgrade their facilities to cope.

### Transport

The development of West of Ifield is totally undeliverable without first building the infrastructure to support it. We know from every development, that despite what is promised the infrastructure comes last if at all and the Policies set out in Chapter 2 & 9 of the NPPF 2021 are not adhered to by Homes England.

The existing roads in the Rusper and Ifield area can not cope with the existing rush hour, school run traffic at the moment. The only new road being proposed will be from Rusper road to Bonnets lane which will just create another bottleneck at this point.. No other new road infrastructure is planned. In addition Rusper Road will be 'closed off' from around the golf course area to Hyde Drive roundabout, forcing traffic to and from Rusper to take a circuitous route on lanes not built or suitable for the amount of new traffic.

The addition of 3000 in the first phase and a total of 10,000 new houses will likely mean an extra 4500 cars on the local roads network in phase 1. This will mean a significant number of extra trips a day including school runs, getting to work, shopping, leisure etc. leading to a huge increase in traffic on roads that can't support it. Residential roads in Langley Green, Ifield and Rusper will become 'rat runs'. There will be increased traffic on A264, at Cheals Roundabout, and on the M23. Rusper and Charlwood will also see significant increased traffic flows through the lanes and village centres. All of this on top of the additional traffic from the continual build in North Horsham and in particular Kilnwood Vale.

The 15 minute neighbourhood proposed by Homes England to mitigate extra traffic is set to fail as the infrastructure, such as town cycle paths needed to make it viable, does not exist. Ifield station is too far from the development to encourage people to walk with no provision for parking at the station except for local surrounding neighbourhood roads, and there is little provision for cycle parking.

Ifield station in the latest figures published from August 2023 to August 2024 has the highest percentage of cancellations in the country. This kind of availability will only encourage passengers to drive to either Crawley, Three Bridges or Gatwick resulting further congestion on the already over crowded roads.

The proposal to put in cycle lanes and a Fast Way bus lane is totally not deliverable because the existing roads are too narrow. The Fast Way bus lane currently in use in Crawley is totally ineffective with 2/3rds of the current buses operating throughout the town not being able to use it because they do not have a guided system fitted.

Train services from Ifield are very infrequent, which will result in people traveling across Crawley to Three Bridges station. This will result in increased congestion in this already very busy area.

### **Air Pollution**

Air quality management areas (AQMA) have already been declared in Crawley along Crawley Avenue and around Hazelwick roundabout (source <https://crawley.gov.uk/environment/environmental-health/air-pollution/air-quality>) due to levels of nitrogen dioxide exceeding what is permitted. Increased traffic from West of Ifield will enter the AQMA when travelling to Manor Royal, Gatwick, the M23 etc, increasing traffic related air pollution in Crawley. Air Quality Management is required by the Environment Act 1995. We believe that policies set out in NPPF 2021 Chapters 2 & 8 are not met.

The increased traffic from this proposed development will lead to higher levels of traffic related air pollution (TRAP). Air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. In the short term, TRAP will have a negative effect on the lungs, blood pressure and nervous system of pedestrians.

Long term exposure can lead to respiratory issues, contributing to an increased risk of poor health into old age and early death. It is recognised as a contributing factor in the onset of cancer.

The announcement by the Government on Sunday 21st September that the "Go ahead" for the second runway at Gatwick will also impact both air pollution and noise.

### **Biodiversity**

The Homes England Hybrid Planning Application looks unsound because its policies on biodiversity and nature recovery (HDC Policy 17) are weak, superficial and inconsistent given the scale of development on greenfield sites – in particular West of Ifield. NPPF 2021 paragraphs 174, 179 and 180 are contravened.

In 2020 Sussex Wildlife Trust told the council this plan should not be taken forward because significant effects on biodiversity remain unquantified the lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue'. HDC has done nothing to assess the damage their Plan will cause to precious habitats and wildlife across the area.

The West of Ifield location including the Golf course is rich with mature Oak copses, Ash and thick ancient hedgerows also including the river Mole and Ifield Brook. Whilst carrying out surveys on the golf course, ecologists have found colonies of rare and highly protected Bechstein's bats, Great Crested Newts not to mention the more common wildlife such as deer, foxes, Buzzards etc.

The West of Ifield site is Crawley's only remaining 'rural fringe' and should be protected for Crawley residents, just as Chesworth Farm is for Horsham residents. It's inconsistent and ruthless to take away from Crawley residents what Horsham is so carefully protecting for its own residents.

### **Housebuilding numbers**

Horsham currently has one of the fastest population growths in the whole of the south east and yet there has been no investment in infrastructure at all putting more and more strain on water supplies, sewage infrastructure, hospital, GP and dental services. The current road network cannot cope with the existing volumes of traffic let alone 3,000 or projected 10,000 more homes.

Homes England speculative Hybrid Planning Application has nothing to do with local demand. If it did all new developments would be for social housing. Instead it is deliberately over supplying the market place to create demand from outside the area on four or five bedroom developments to satisfy builders greed for profit. What ever happened to the governments flagship Levelling up policy to establish a well-functioning and productivity economy in every part of the UK!

### **To conclude**

Homes Englands Hybrid Planning Application are flawed in so many ways with National Policy Framework requirements as I have outlined above. Furthermore to my understanding this application is also illegal because the proposed site West of Ifield is not even in HDC's existing plan because the site was deemed not fit for purpose.

As Crawleys last piece of rural fringe between the two towns, it is vital this valued open space for both residents and wildlife remains free.

Yours Sincerely

