

I strongly object to the Application DC/25/1312 from Homes England to build 3,000 new homes and a service road, adjoining the Crawley neighbourhood of Ifield. My objection is based on:

- The land wasn't allocated for housing in the current Planning Framework - Nov 2015;
- There is no longer the need for a Western Relief Road (now CWMCC) round Crawley;
- The Destruction of the western setting/views of the Ifield Village Conservation Area;
- The Absence of a viable Water Neutrality policy.

The land wasn't allocated for housing in the current Planning Framework - Nov 2015

There is no mention of the proposed housing development west of Ifield in the document entitled Horsham District Planning Framework - November 2015. A draft revised Planning Framework - 2023 was submitted to the Planning Inspectorate towards the end of last year, but the Inspector called a halt during the Public Scrutiny process and Horsham District was advised to withdraw the new Planning Framework. One of the main reasons for this action was the breadth of public representation and anger against the proposed development West of Ifield.

This Planning Application has been submitted by Homes England on the mistaken and somewhat cheeky premise that the Draft Planning Framework - 2023 should continue to carry weight, in terms of Housing Policy, even though it was thrown out by the Planning Inspectorate earlier this year. I question the legality of this Application.

There is no longer the need for a Western Relief Road (now CWMCC) round Crawley

I attended the West of Ifield Exhibition Event at the end of April this year where it was confirmed by a member of Homes England (HE) staff that the CWMCC was a three phase development of which the middle 'West of Ifield' stretch is to be Phase 1. Naturally I asked to see or to be told details of the approximate routing and timings of Phases 2 and 3 as they surely must be known. Apart from saying that the intention was to connect the A264 to the M23/A23, I was told that those elements had yet to be planned in an as yet unknown timescale! I then focussed on the need to link the A264 to the A23/M23 via the three proposed housing developments and through an overcrowded Manor Royal, and suggested that this was no longer necessary as the road planners had got there first, indeed quite a few years ago! A very sensible two lane dual carriageway was built between the Sullivan Drive round-about on the A264 and the Pease Pottage round-about at the southern end of the M23, skirting around Broadfield. This serves the purpose very well as the traffic can move faster and thus more efficiently, avoiding any 'built-up' areas.

So, in truth, this much-trumpeted multi-modal highway is merely a very large and expensive service road to a housing development specifically located on rural farm land already owned by HE where access through the existing rural lane infrastructure is impossible.

The Destruction of the western setting/views of the Ifield Village Conservation Area

Background

The Ifield Village Conservation Area (IVCA) was first designated in 1981 for its historical and architectural value and its location close to meadows and the countryside. It was expanded in 1992, much to the delight of local residents, to include Ifield Village Green, Rectory Lane and Tweed Lane. A further expansion took place on its eastern flank in 2013, but its western border was and remains Ifield Brook *aka* The Millstream. In its present form the Conservation Area is managed by an Advisory Committee who, in partnership with Crawley Borough Council, prepared a Conservation Area Statement which was adopted in 2018. The following is an extract from that Statement -

"The statement is a material consideration when the Council determines planning proposals for the area. It should be used to manage change in a positive manner and help inform future action by the Council and other parties; including informing decisions on planning applications that may have an impact within or adjoining the Conservation Area."

Furthermore, the Statement sets out 'Guidance for Development' within which the first three Objectives for planning policy and proposals are:

1. *Protect the village character and setting and prevent the Conservation Area becoming a rural island in an urban area;*
2. *Retain the historic scale, character and appearance of the village settlement;*
3. *Protect the surrounding fields and open space within and adjacent to the Conservation Area from development which would be out of scale, character and appearance with the local rural environment.*

These three important objectives are amplified within a section headed Valued Views which states:

"The Conservation Area straddles the edge of Crawley's built up area and enjoys a number of key access points to the open space beyond. Views towards open areas beyond the town are important to the historic setting of the Conservation Area and should be preserved. Views into the conservation area are also important. Development that impinges on these views will not be permitted. Likewise any new development that can emphasize these views, should do so through subtle and appropriate means."

Obviously the Ifield Village Conservation Area Advisory Committee should have been consulted by HE - they were not.

The Hybrid Planning Application by Homes England

As a general comment, this hybrid approach to achieving Planning Permission enables HE to 'kick the can down the road' on certain really serious issues and get an agreement in principle for the entire development before they need to address those problem issues. For the Ifield Village Conservation Area this shows itself in two very significant ways.

Valued Views

Within sections 3.3.1 and 3.3.2 of the Design and Access Statement - Part 1, Figures 34 and 37 give an impression of the key views in and out of the site. According to HE, across the entire western boundary of the Conservation Area and the associated Site of Nature Conservation Importance (SNCI) there are but four views worthy of mention (two looking in and two looking out). Apparently ancient pasture land and field boundaries do not qualify as a Valued View and HE infer somewhat flippantly that mature trees block most of that anyway. By far, most of the trees and hedgerows are deciduous, so for six months or so the trees are bare - I can think of nothing more attractive than a low winter sun glinting through a mosaic of branches!

The entire western boundary of the Conservation Area and the associated SNCI (in total just under 2km) provides valued views in both directions and is a fundamental part of the setting of the Ifield Village Conservation Area. Indeed the IVCA Statement reinforces that by stating that *"Development that impinges on these views will not be permitted. Likewise any new development that can emphasize these views, should do so through subtle and appropriate means."*

The majority of the new development, including the Neighbourhood Centre/Market Square will dominate the view from and along the entire western boundary of the Conservation Area - I fail to see how a housing development which, at its core is 20 metres high, can be described as 'subtle and appropriate'! Nor can I understand how a 2.5 kilometre multi-modal service road is appropriate and subtle. It is nothing but sheer vandalism!

Proximity and Scale of 'The Meadows'

The eastern development site boundary (Ifield Brook) for the largest housing area in the whole development (over 1,000 new homes) together with allotments, sports facilities and up to fifteen pitches for the Gypsy and Traveller Community adjoins the Ifield Village Conservation Area and the associated SNCI on its south western flank. Some 20 or so metres from Ifield Brook, rows of dwellings from 14-16 metres high are to be built. I quote from the Conservation Area Statement: *"The Site for Nature Conservation Importance (SNCI) around Ifield Brook Meadows to the west contributes significantly to the semi-rural setting of the Conservation Area. Development should avoid any detrimental impact to this area."*

There is, however, a glimmer of recognition by HE that the Conservation Area and SNCI have value. Para 3.4.1 and Figures 48, 49, 50 and 51 of the Design and Access Statement - Part 1 all identify Ifield Meadows as a Rural Fringe. They go on to refer to photographs, under 'Key Characteristics' (bullet point 7), as *"Some attractive outward views of the countryside to the west and of St Margaret's Church"*.

And then under the heading 'Implications for the Masterplan' lies the statement: *"Ifield Brook Woodland and Meadows is a valuable area for nature conservation and also has historical importance due to its location within the Ifield conservation area. It also forms an important flood management function, and is highly valued (by the) local community for recreation. As a result, it is important that the masterplan should not negatively impact this sensitive area."*

So, what is it to be? Even HE appears to realise the importance and value of Views, Historical Significance, Flood Management and shared outdoor space for the Local Community. But then, under Para 7.12.9 which is commenting on the Visual impact of the Development on the Landscape, they state *"There would not, however, be a significant effect on views from Ifield Village Conservation Area".*

So perhaps they need to go back to the drawing board and reconsider how they can uphold those very laudable principles within the context of their proposed housing development which, in my opinion, is the wrong type of homes in the wrong place.

Historic England were approached as one of several Other Consultees - it is recorded that they *"Agreed approach on cultural heritage assessment"* but have since responded with a strong representation spelling out the harm, by proximity and scale, to nationally important heritage assets that would result if this development were to go ahead in its existing form. They also have concern regarding the severing of the path between St Margaret's Church and the Medieval moated site at Ifield Court. Most of the remaining path (known locally as the "Quarter Mile") will be buried under houses and the Multi-Modal service road (CWMMC) would provide a distinct and ghastly physical and visual barrier.

Furthermore, Surrey County Council have noted that the proposed development site is part of a larger Archaeological Notification Area and have stated that:

"No development shall take place until a programme of archaeological work has been secured in accordance with an overarching Written Scheme of Investigation that has been submitted to, and approved in writing by, the Local Planning Authority.

Reason: As this matter is fundamental as the site is of archaeological significance and it is important that it is recorded by excavation before it is destroyed by development in

accordance with Policy 34 of the Horsham District Planning Framework (2015)"

The Absence of a viable Water Neutrality policy

This subject is not properly addressed in this Application, but it needs to be because without satisfying this responsibility it would be unwise, indeed foolhardy, to permit any form of construction and permanent damage to the proposed development site prior to absolute certainty about the supply of potable water. Horsham Council's own website states that "*any new development coming forward in the affected area must be 'water neutral', which Natural England define as 'the use of water in the supply area before the development is the same or lower after the development is in place.'*"

As previously mentioned I attended the West of Ifield Exhibition in April this year where it was announced that HE would be pumping water from deep underground rather than relying upon a supply from Southern Water. I asked whose water was being taken and the answer given by an HE staff member was that it is nobody's water and is free for the taking! I now learn from Water Neutrality Statement Appendix F (a supporting document to the Application) that the Upper Tunbridge Wells Sand Formation aquifer, which is accessible from under the proposed West of Ifield development site, has been tested and predicted to supply, at the present time, the necessary volume of water for the Site, some 500 cubic metres per day, even during the summer months. But a large question mark still remains over whether the aquifer can cope with our increasingly hot summers both now and in the future. Unfortunately there is no further evidence given for this in the Planning Application, so as yet, the principle is not proven for the long term. Nor is there any evidence that either Natural England or the Environment Agency agrees that 'tapping' into the water from another aquifer, which surely must be in another region's Water Resource Zone, is acceptable.

It appears from the Supporting Documentation that Homes England have spent a considerable amount of time and public money investigating the availability of water supplies from underground aquifers. Conversely, I could find no evidence from the Supporting Documentation that Southern Water and Thames Water have been informed of the significant borehole drilling that has already taken place, nor of HE's intention to raid the reserves of an adjacent Water Authority. Instead they have, through the private borehole specialist company they have employed, liaised directly with the Environment Agency (EA) to seek an Abstraction Licence, effectively bypassing the two Statutory Water Authorities who surely need to be involved! Plans for the siting of the 3 or 4 production boreholes and the associated pumping and water treatment facilities are well advanced and will feature in the first phase of the housing development along with the service road (CWMMC) to the development. So if this goes ahead, will HE add another string to their bow and own/run a private water company using the water resources of another statutory authority or will they pass ongoing responsibility to the public sector and in doing so immediately infringe Natural England's clear definition of Water Neutrality? This could take time and legal process, effectively delaying the start of the housing development.

Furthermore, just in the last week, South East Water (SEW) has announced that it has only six weeks' worth of water in the Ardingly reservoir. Although it has been permitted by the EA to refill the reservoir from the River Ouse, the current levels in the river are too low to allow extraction. This clearly demonstrates that the South East of England is already running out of water!!

However, to overcome any Planning Application delay and 'kick the can further down the road' HE have, in Para 7.11.24 of the Planning Statement, proposed the following pre-occupation condition: "*Subject to wording, the Applicant agrees in principle to a pre-occupation condition to secure a water neutrality strategy at West of Ifield, in line with the strategies set out in the Water Neutrality Statement.*"

If they fail, what happens then? Are we left with an uninhabitable 'white elephant' in the middle of our beautiful countryside or will the authorities cave in and approve a 'just this once' disaster? And what will be the implications for the further 7,000 homes in phases 2 and 3?

Conclusion

Prudence dictates that this Application be refused until:

1. Horsham District Council have drawn up a new Planning Framework which identifies the Land West of Ifield as 'allocated for housing' and is found to be acceptable to the Planning Inspectorate;
2. The actual need for a Western Relief Road (CWMMC) is properly re-assessed;
3. Water Neutrality is assured, not only for the 3,000 homes currently proposed but also for the other 7,000 homes which form phases 2 and 3 of this monstrous destruction of Ifield's and Ruper's countryside;
4. Proper weight is given to the very reasonable, but totally ignored, Ifield Village Conservation Area protections that have pertained for the past twenty five years. These protections are totally in line with Historic England's advice provided just a few days ago;
5. The pre-Application requirements of Historic England, Natural England, the Environment Agency and the Archaeological Survey identified by Surrey County Council Historic Environment Planning department have all taken place.

There must be no more 'kicking the can down the road' in order to avoid the difficult questions that should be asked and answered **NOW**. Make no mistake about it. This Application has been driven solely by the desire of Homes England to maximise the value of their existing countryside assets and nothing more. In doing so they have done their best to hide the reality of this unwanted development. It will produce homes in the wrong place for the wrong people, as is borne out by Horley Council's Housing Department submission (11/09/25) not supporting the Application as it

does not align with local housing need.