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Categories: Comments Received

Formal Objection to Planning Application DC/25/1312 — Land West of Ifield

To: The Planning Department, Horsham District Council **Case Officer:** Jason Hawkes **Application Reference:** DC/25/1312 **Location:** Land West of Ifield, Charlwood Road, Ifield, West Sussex
Address: Sandalwood Rusper Road Ifield Crawley RH110LN **Date:** 9th October 2025

I am writing to formally **OBJECT** to the Hybrid Planning Application **DC/25/1312** submitted by Homes England for a phased, mixed-use development, including up to 3,000 residential homes, on land West of Ifield.

My objection is based on the following material planning considerations, which I believe demonstrate that this development is unsustainable, inconsistent with planning policy, and detrimental to the local area and its infrastructure.

1. Conflict with Development Plan Policy (Speculative Nature)

The application is considered speculative and premature, failing the requirement for development to be "plan-led" for the following reasons:

- The site was proposed for allocation in the Draft Horsham Local Plan (HDPF 2023-2040), but that plan was recently found **unsound** by the Planning Inspectorate and subsequently withdrawn by the Council.
- The Land West of Ifield is therefore **not currently allocated** for development in the adopted Horsham District Planning Framework (HDPF 2015) or any emerging, sound Local Plan.
- Allowing a development of this scale outside a robust, legally compliant Local Plan undermines the Duty to Cooperate with neighbouring Crawley Borough Council, whose infrastructure this development would heavily impact, and sets a dangerous precedent for cumulative erosion of the strategic gap between Crawley and Horsham.

2. Cumulative Impact and the Enabling of Unplanned Future Development

While application DC/25/1312 formally seeks permission for up to 3,000 homes, it is widely acknowledged by the applicant (Homes England) and local communities that this development is merely **Phase 1 of a potential 10,000-home masterplan** for the area between Horsham and Crawley (sometimes referred to as 'Crawsham').

- **Enabling Infrastructure:** The current application includes enabling highways infrastructure, such as the initial phases of the Crawley Western Multi-Modal Corridor. This infrastructure is not just designed to support 3,000 homes; it is clearly intended to unlock and facilitate the construction of the wider, unallocated 10,000-home development.
- **Failure of Phased Assessment:** The Council must not assess this application in isolation. Approving the initial, necessary infrastructure for Phase 1 effectively **pre-determines and commits**

the Council to accepting the unallocated future phases, bypassing the proper scrutiny that a 10,000-home new settlement would require through a sound Local Plan process.

- **Infrastructure Deficit:** Assessing the application based only on the impact of 3,000 homes dramatically understates the long-term cumulative impact on the road network, water supply, sewage treatment works, and social infrastructure across both the Horsham and Crawley districts. The application fails to demonstrate that the infrastructure proposed is robust enough to serve the ultimate scale of development planned for the area.

This approach is contrary to the spirit of transparent and comprehensive planning, forcing a decision on a large-scale strategic development in a piecemeal fashion. The application should therefore be refused for failing to robustly and transparently assess the cumulative effects of the full, anticipated development.

3. Failure of the Statutory Duty to Cooperate

The submission of this speculative, hybrid application (DC/25/1312) by a government agency (Homes England) for a site that is unallocated in an adopted Local Plan, demonstrably undermines the statutory **Duty to Cooperate** (as set out in the Planning and Compulsory Purchase Act 2004, as amended).

- **Prejudicing the Local Plan Process:** The application directly pre-empts and prejudices the preparation of a sound and legally compliant Local Plan for Horsham District. By submitting a major housing scheme outside of the formal plan-making process, Homes England forces the Local Planning Authority (Horsham District Council) to determine the application based on an absence of agreed strategic context.
- **Undermining Cross-Boundary Cooperation:** The Duty to Cooperate requires Horsham District Council to engage constructively, actively, and on an ongoing basis with neighbouring authorities, particularly **Crawley Borough Council**, regarding strategic matters like housing, infrastructure, and cross-boundary impacts. This development, situated on the immediate boundary with Crawley and strongly opposed by Crawley Borough Council, is the antithesis of collaborative strategic planning.
- **Creating an 'Unsound' Local Plan Risk:** If this application is approved, it would effectively sanction a major housing site without it being subjected to the necessary scrutiny and testing required by a Planning Inspector to confirm that the Duty to Cooperate has been met. This action makes Horsham District Council vulnerable to future legal challenge and risks rendering any future Local Plan for the District 'unsound' due to procedural failure.
- **Strategic Housing Delivery:** Housing delivery of this scale (3,000 homes in Phase 1) must be agreed upon by surrounding authorities to ensure the shared infrastructure (water, sewage, health, transport) is planned for regionally. By bringing this forward speculatively, the application sidesteps meaningful and required strategic cooperation on infrastructure delivery.

4. Severe Impact on Local Infrastructure and Transport

The proposed development for 3,000 homes—with long-term fears of up to 10,000 houses—will place an intolerable and unsustainable strain on existing services and transport links:

- **Traffic Congestion:** The addition of thousands of daily vehicle movements will exacerbate existing severe congestion across Ifield, Crawley, and key routes (such as the A23/M23 network). The proposed **Crawley Western Multi-Modal Corridor (Phase 1)** is insufficient to mitigate the volume of traffic generated by this scheme.

The Transport Assessment submitted with application DC/25/1312 fundamentally underestimates the impact of 3,000 new homes on the already strained local road network and fails to provide adequate mitigation for existing residents.

- **Inadequate Modeling of Congestion:** The proposed development relies on a new strategic road (the Crawley Western Multi Modal Corridor) which will attract significant traffic. However, the modelling fails to demonstrate how the local feeder roads, especially during peak hours, will cope. The increase in journeys will cause **severe residual cumulative impacts** on the road network, contrary to the National Planning Policy Framework (NPPF).
- **Increased Rat-Running on Residential Roads:** Residents seeking to avoid inevitable congestion on the primary new route will resort to using existing residential roads as 'rat runs.' This will place intolerable pressure and safety risks on:
 - **Ifield Avenue:** A main thoroughfare into Crawley that is already heavily used and subject to congestion.

- **Ifield Green:** A residential area not designed to handle high volumes of commuter traffic.
- **Ifield Wood:** A narrow, rural lane where increased traffic volumes pose a severe risk to pedestrians, cyclists, and highway safety.
- **Community Severance via Rusper Road Closure:** A major concern is the proposal to close **Rusper Road at Furlong Farm** as part of the enabling infrastructure. This closure imposes **significant and unnecessary detours** upon existing residents of Ifield and West of Ifield who currently rely on this route for direct access to the village of Rusper and its services. This action effectively severs an established local travel route, creating substantial inconvenience, increasing journey times, and adding to local traffic and emissions, contrary to principles of creating cohesive and connected communities.
- **Public Transport Capacity:** Local rail services (Ifield and Faygate stations) are already operating close to capacity and lack adequate parking or drop-off facilities to accommodate the projected hundreds of additional daily rail passengers. Bus services are currently inadequate to attract sufficient numbers away from private car use.
- **Essential Services:** The massive influx of residents will overwhelm existing local health services, including GP surgeries, dentists, and primary care facilities, without robust, legally binding, and timely Section 106 agreements for substantial upgrades.

5. Unacceptable Hazards from Construction Traffic and Route Selection

The proposals regarding construction traffic and the reliance on unsuitable local roads pose an immediate and severe risk to public safety and the amenity of existing residents.

- **Unsuitability of Local Road Network:** The proposed haul routes for construction traffic, which are expected to rely heavily on roads such as **Tangmere Road** and the existing, narrow sections of **Rusper Road**, are fundamentally unsuitable for sustained use by Heavy Goods Vehicles (HGVs). These roads were not designed for constant heavy traffic; they lack adequate passing places, footpaths, and sightlines, leading to inevitable congestion, damage to road surfaces, and high risk of accidents.
- **Danger to School Children (The Mill Primary School):** The reliance on these local roads places construction traffic dangerously close to **The Mill Primary School** and numerous residential areas. The heavy daily movement of HGVs, machinery, and site vehicles during school drop-off and pick-up times creates an unacceptable hazard to children, parents, and pedestrians, undermining local highway safety for the most vulnerable users.
- **Duration and Environmental Impact:** The construction phase is expected to last for many years, impacting the daily lives and safety of thousands of local residents. The noise, dust, and vibration resulting from this sustained heavy traffic will significantly diminish residential amenity along the haul routes, contrary to core planning objectives.
- **Inadequate Mitigation:** The application fails to demonstrate robust, enforceable measures to reroute construction traffic away from sensitive residential and school zones, or to guarantee that HGVs will not use these local roads as shortcuts, particularly given the closure of Rusper Road at Furlong Farm which will already push local traffic onto the smaller surrounding roads.

6. Insufficient Water Supply and Sewage Treatment Capacity

I strongly object to the application on the grounds that the supporting infrastructure for **water supply and sewage treatment** is currently inadequate to accommodate a development of this scale (up to 3,000 homes in Phase 1, and the cumulative impact of 10,000 homes).

- **Capacity Crisis at Crawley Sewage Works (WwTW):** The existing Crawley Wastewater Treatment Works (WwTW), which would receive the sewage from this development, is already operating near or at capacity, particularly during periods of high rainfall. The addition of waste from up to **3,000 new homes** (equating to over 6,000 new residents) will place an unsustainable burden on the WwTW.
- **Environmental Impact of Overcapacity:** Increased discharge volumes from an overloaded treatment works increase the risk of **untreated or poorly treated effluent** being released into local watercourses, including the Ifield Brook catchment. This constitutes an unacceptable environmental and ecological hazard that directly undermines planning policy regarding water quality and biodiversity protection.
- **Water Supply Constraints (Water Neutrality):** The region is classified as an area of serious water stress. The application fails to demonstrate how the delivery of 3,000 homes will achieve

genuine **water neutrality**, which is a requirement for sustainable development in this area. Connecting thousands of new users without guaranteed new water resource infrastructure places unacceptable pressure on the existing supply for the wider Crawley and Horsham communities.

- **Unquantified Financial Burden of Infrastructure:** The application fails to provide a full and transparent accounting of the **multi-million-pound cost** required to upgrade the Crawley WwTW and associated water supply networks to cope with this development. Approving this plan risks shifting a massive, unquantified financial liability onto the statutory undertakers and, subsequently, the bill payers, which is a violation of the principle that development must be supported by necessary, **secured** infrastructure.
- **Developer Reliance on Future Promises:** The application appears to rely on future, unspecified upgrades or investment by the statutory undertakers (e.g., Southern Water/Thames Water) to provide the necessary capacity. Approving development on the basis of **unsecured infrastructure** and reliance on **future promises** is contrary to the principle of sustainable, plan-led development. The necessary infrastructure capacity must be guaranteed and phased alongside the housing delivery, not left as a post-approval commitment.

7. Unproven Reliance on Borehole Water Extraction

I object to the application's reliance on **borehole water extraction** as a proposed source for non-potable water, as this strategy is **untested, lacks sufficient supporting evidence, and introduces significant ecological risk**.

- **Unproven Technical Viability:** The application presents borehole abstraction as a solution to reduce mains water demand, yet it fails to provide the robust, long-term hydrogeological data necessary to prove the boreholes can sustainably supply the proposed volume of water for 3,000 homes. The feasibility of this large-scale, continuous extraction is unproven.
- **Risk to Groundwater and Ifield Brook:** Extracting large volumes of groundwater through boreholes poses a direct risk of **lowering the water table**. Given the proximity of the Ifield Brook and associated ecologically sensitive areas, this could lead to the desiccation of dependent habitats, including the Ifield Brook Meadows Local Green Space, and severely impact local biodiversity (e.g., the potential Bechstein's bat population).
- **Contradiction of Water Neutrality:** True water neutrality requires a sustainable and proven source. Relying on an abstraction method that may fail or may have unmitigated environmental consequences on local surface water is not a robust or responsible way to meet this requirement. The lack of detailed testing renders the proposed water strategy technically unsound.
- **Need for Pre-determination Testing:** The planning authority cannot approve a development predicated on infrastructure solutions that have not been proven to be sustainable, environmentally safe, and physically viable prior to determination.

8. Hydrological Impact and Increased Surface Water Flood Risk

The development's proposals regarding surface water management and flood attenuation are highly concerning and appear insufficient for the proposed scale of construction:

- **Increased Runoff and Rusper Road Risk:** The large-scale removal of existing permeable green space and the introduction of extensive hardstanding (roads, roofs, pavements) will inevitably lead to a substantial **increase in surface water runoff**. This heightens the risk of pluvial (surface water) flooding, particularly impacting the lower-lying areas around **Rusper Road** near Furlong Farm and adjacent properties which already experience water stress during heavy rainfall events.
- **Photographic evidence of flooding in Rusper Road. See attached Photos.**

Strain on Existing Drainage: Relying solely on new Sustainable Drainage Systems (SuDS) and existing infrastructure to manage the huge volume of water generated by 3,000 homes (and potentially 10,000) is technically high-risk. There is insufficient evidence to reassure residents that the proposed drainage strategy will not exacerbate flooding issues in the Ifield Brook catchment area and surrounding existing residential streets.

- **Water Table Alteration:** Excavation and construction on this site risk significant alteration of the local water table and natural flow paths toward Ifield Brook. This could lead to a permanent increase in waterlogging and ground saturation in neighbouring areas, compromising existing ecosystems and affecting the stability of adjacent historic structures and land (as noted in Section 3 regarding subsidence).

9. Disregard for Up-to-Date Flood Risk Data

The planning application, including the submitted Flood Risk Assessment (FRA) and Environmental Statement (ES), appears to ignore recent flood mapping by The Environment Agency (March 2025), fundamentally compromising the safety and sustainability of the proposals.

- **Reliance on Outdated Data:** We object to the reliance on flood mapping or modelling data that does not incorporate the **most recent 2025 Environment Agency (EA) Flood Maps**. The continuous changes in climate patterns and localized urban drainage capacity mean that only the most current EA data provides an accurate statutory baseline for assessing flood risk.
- **Underestimation of Risk to Rusper Road:** By ignoring the latest data, the application severely **underestimates the existing and future flood risk** on Rusper Road and the surrounding properties. The proximity of the site to the Ifield Brook and the known sensitivity of this area to intense rainfall events requires an assessment based on the highest available standards.
- **Climate Change Vulnerability:** The failure to model the development using the most recent EA data, which incorporates the latest predictions for climate change (including increased frequency and intensity of storms), means the development's proposed Sustainable Drainage Systems (SuDS) and mitigation measures are likely to be insufficient and prone to failure, risking the flooding of both the new development and existing homes.
- **Unsound Technical Basis:** This technical failing—disregarding statutory, up-to-date flood data from the primary authority—renders the entire Flood Risk Assessment unreliable and fails to satisfy the requirements of the National Planning Policy Framework (NPPF) on planning for flood risk. The application must be refused until a rigorous assessment using the **2025 EA Flood Maps** is submitted and verified.

10. Environmental and Ecological Damage

The application poses significant, unmitigated threats to vital local green spaces and biodiversity:

- **Ifield Brook Meadows Local Green Space (LGS):** The development directly impacts or severely diminishes the setting of Ifield Brook Meadows, which provides crucial ecological value and recreational space. The development creates a potentially catastrophic environmental emergency at Ifield Brook.
- **Biodiversity Loss:** The land contains protected species, notably the recently identified potential presence of the **White-Clawed Crayfish**, and **Bechstein Bat** populations whose species require strict protection. The development's Environmental Statement fails to demonstrate effective mitigation against the destruction of habitat for these and other sensitive species.
- **Water and Drainage:** There are major concerns that the proposed foul water drainage and water supply strategies are "staggeringly deficient." The scale of the development risks altering natural water patterns, potentially leading to **subsidence** in the ancient Parish area and increased **flood risk** for existing communities.

11. Impact on Terrestrial Mammals and Corridor Fragmentation

The scale and nature of the proposed development, particularly the creation of the enabling highways infrastructure, will cause unacceptable **habitat fragmentation** and result in the loss of populations of large terrestrial mammals, contradicting the duty to conserve biodiversity.

- **Destruction of Foraging and Commuting Routes:** The large mammal populations in this area, including [REDACTED] **Roe Deer**, and **Foxes**, rely on the continuous network of green corridors, hedgerows, and woodland within the application site for foraging and safe movement. The development will irrevocably destroy and interrupt these established routes.
- [REDACTED]
- **The Relief Road as an Insurmountable Barrier:** The construction of the **Crawley Western Multi Modal Corridor** (the new relief road) will act as a permanent, impassable barrier, severing the

connectivity between wildlife habitats on the east and west sides of the site. This will isolate populations, leading to localized extinction and genetic bottlenecking, and significantly increase the risk of road casualties for deer and other large mammals attempting to cross.

- **Inadequate Mitigation:** If the application relies on mitigation such as underpasses or green bridges, these measures must be guaranteed, detailed, and proven effective for shy, large mammals. The plans currently fail to provide confidence that the proposed infrastructure is designed to maintain functional ecological connectivity across the development site, not just for small or airborne species, but for the large, ground-dwelling wildlife of the area.

12. Direct Impact on Named Residential Clusters (Yew Trees and Sandalwood)

The application demonstrates a clear failure to protect the residential amenity of specific, established clusters of homes bordering the site, most notably those known as **Yew Trees** and **Sandalwood** along Rusper Road.

- **Unacceptable Proximity and Overlooking:** The proposed layout and scale of the new development immediately adjacent to these properties will result in an intolerable degree of **overlooking and loss of privacy**. New residential units will be positioned too close to the existing boundaries, allowing direct, intrusive views into the private gardens and first-floor habitable rooms of properties in **Yew Trees** and **Sandalwood**. This level of intrusion is fundamentally contrary to planning standards for protecting residential amenity.
- **Overshadowing and Loss of Daylight:** The height, massing, and close proximity of the proposed new structures will cause **significant overshadowing** to the primary windows and private external amenity areas of these long-standing residences. The loss of natural light and sunlight, which these properties currently enjoy due to the undeveloped nature of the Golf Course land, will be permanent and substantially detrimental.
- **Lack of Effective Screening/Buffer:** The plans do not provide an adequate, robust, and immediate **green buffer or effective screening** between the boundary of the existing homes and the new development footprint. Relying on future planting to mitigate the severe visual intrusion and loss of outlook for residents of Yew Trees and Sandalwood during and after construction is wholly unacceptable. An effective separation distance and mature boundary treatment must be guaranteed from the outset.

13. Impact on Heritage and Character

The proposed development will result in the permanent loss of the historic rural landscape that defines the ancient Parish of Ifield:

- **Historic Setting:** The development will erode the historic setting of the 13th-century **Church of St Margaret** and the adjacent **Ifield Village Conservation Area**, removing the rural backdrop that preserves the area's historical identity.
- **Archaeological Risk:** Alterations to drainage and ground conditions pose a direct threat to below-ground archaeological remains and deposits, a concern previously highlighted by specialist advice.
- **Loss of Rural Charm:** The network of historic footpaths and the intimate patchwork of fields and shaws will be lost, channelled instead through modern housing estates, irrevocably destroying their historic character and contribution to local amenity.

14. Loss of Designated Recreational Land (Ifield Golf Course)

The proposed development necessitates the loss of the Ifield Golf Course site, which represents a significant and unacceptable loss of existing recreational space and community amenity.

- **Loss of Sporting Facility:** The Ifield Golf Course provided a dedicated, large-scale, and accessible facility for sport, physical activity, and social interaction, serving not just the immediate area but the wider population of Crawley and Horsham. Its permanent removal runs contrary to national and local planning policies that seek to retain and enhance facilities that contribute to **health and wellbeing** and provide sporting opportunities.
- **Inadequate Replacement:** While the application proposes new public open spaces, sports facilities and some upgrades to Tilgate municipal Golf course and Goffs Park Pitch and Putt, these are not

an equivalent replacement for an established, 18-hole golf course. The loss of a major, well used bespoke sporting venue with a high membership (including high youth membership) cannot be adequately mitigated by the proposals, representing a clear **net loss of sporting amenity** for existing communities.

- **Irreversible Erosion of Green Infrastructure:** The golf course land contributes significantly to the area's informal **Green Infrastructure** network. Its loss permanently sacrifices a substantial area of managed open space, contributing to the perceived merging of Crawley and Horsham, and further diminishing the quality of life for long-term residents.

Conclusion

For the reasons detailed above, particularly the speculative nature of the application outside of an adopted Local Plan and the severe, unmitigated impacts on infrastructure flooding and the environment (specifically the ecological status of Ifield Brook Meadows), I respectfully urge Horsham District Council to **REFUSE** planning application DC/25/1312.


Sandalwood
Rusper Road
Ifield
Crawley
RH110LN

