

From: Planning@horsham.gov.uk
Sent: 22 September 2025 13:28
To: Planning
Subject: Comments for Planning Application DC/25/1312

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Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/09/2025 1:28 PM.

Application Summary

Address: Land West of Ifield Charlwood Road Ifield West Sussex

Proposal: Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.|cr|

Case Officer: Jason Hawkes

[Click for further information](#)

Customer Details

Address: 35 Hillmead Gossops Green Crawley

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Design
- Highway Access and Parking
- Loss of General Amenity
- Other
- Overdevelopment
- Trees and Landscaping

Comments:

Application reference number DC/25/1312 West Sussex
RH11 8RP
By Email

22/09/2025

Dear Sir/Madam

As a resident of Crawley and a member of Ifield Golf Club; I am writing to object to Horsham District Council's policy HA2 - West of Ifield development which is in my opinion unsound in terms of several sections of the National Planning Policy Framework (NPPF), which I shall elaborate on further : -

Inclusion of Ifield Golf Course

I have been a member of Ifield Golf Course since 2007 and in that time it has been fully used by not only its members but large quantities of casual golfers from in and around the "Crawley" area. It is also a social hub for Crawley providing a venue for Charity functions, wakes, parties etc..

OBJECTION 1

HDC have not followed National Planning Policy Framework (NPPF) 2023 para 16. It says that plans should be:-

- c) shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

The whole project is reliant on being allowed to build on Ifield Golf course and the only mention of it in the local plan is that " the provision of appropriate mitigation for loss of Ifield Golf facilities will be required in the absence of site specific evidence demonstrating the surrounding area has capacity to accommodate its loss." The fact that it is still uncertain how the Ifield site will be delivered demonstrates that c) has not been done.

Regarding d) The only mention of Ifield in the local plan is not clearly written and unambiguous, as it is giving an either/or option. It either needs to show that there is plenty of capacity in the area which it cannot because there isn't or to provide another facility, which it doesn't clearly propose. And it is also not clear if the facility is provided whether this is another golf course as required by sub clause b) or other sporting facilities as required by sub Clause c) of para 99 of the NPPF. Policy HA2 West of Ifield has not been positively prepared because it is inconclusive and the deliverability of land is uncertain.

OBJECTION 2

HDC is not legally compliant with its Statement of Community Involvement (SCI) regarding the allocation of the West of Ifield site HA2. This is because there has been no community involvement regarding the building on Ifield Golf Course. Ifield Golf course is adjacent to Crawley so it is their residents who should have been subject to community involvement. This is a cross border issue which has not been dealt with by procedure which means HDC are not legally compliant with SCI para 2.20.

The only mention in the local plan is " the provision of appropriate mitigation for loss of Ifield Golf facilities will be required in the absence of site specific evidence demonstrating the surrounding area has capacity to accommodate its loss." No suitable information is available for

public information, comment or consultation that shows how Paragraph 99 of the NPPF will be satisfied.

The assessments in the evidence pack provided are flawed and not site specific. Even after updating they still use the same flawed material. As advised in SCI para 1.11 HDC have also failed to encourage Homes England to engage with communities and stakeholders as soon as possible at pre-application stage.

It is known that Homes England have completed an assessment of Ifield Golf course but they refuse to make it available until they submit their Outline Planning Application.

OBJECTION 3

HDC assessments and Homes England position statement included in the evidence pack for the Local Plan, have not adhered to Para 99 of the NPPF or Sport England ANOG S26.

- 1) HDC assessments are not site specific to Ifield Golf Course as required by the NPPF Para 103
- 2) HDC assessments and Homes England position statement rely completely on surplus capacity which is contrary to ANOG S26 which says "the findings of the assessment will have to show that the particular building or land the subject of the proposal is surplus to requirements and not just indicate that there is a surplus of that type of provision in the relevant area.

Surplus capacity in the area was the only parameter used to show that, Ifield Golf course is surplus to requirements and also that there is no need to provide a replacement. This is confirmed by Homes England statement: "Deeming the course surplus to requirements - at this stage, there is no overriding case to retain the current facility with alternative supply within the immediate catchment area capable of meeting the demand for golf provision that is currently provided by Ifield Golf Club, with sufficient capacity elsewhere that would better meet the future golfing demands across the entire golfer journey" The inclusion of the Ifield golf course site in the local plan is based on evidence which did not follow the NPPF and Sport England guidance.

OBJECTION 4

Ifield golf course has been included in the local plan based on evidence which has not been completed, discussed or challenged. The Homes England information provided in the evidence pack for the local plan suggests that alternative sports could be provided to mitigate for the loss of Ifield. They say " Direct delivery of alternative sports and recreational provision- a significant package of investment in alternative sports and recreational facilities can be delivered through the redevelopment of Ifield Golf Course, both within the existing site and wider master plan area, the benefits which are likely to clearly outweigh the loss of the golf course." Homes England have not given any details on, the need for the alternative sports, how and by whom the current provision is used and the benefit of the proposed against the detriment of the current as required by S26 of ANOG. And as a golfer I do not require alternative sports I need a golf course!

Investigation of the information they have given has shown that the alternative sports would not make up for the loss of Ifield they are:-

- 1) up to 9.2 hectares of publicly accessible parks and 5.7 hectares of amenity green space; Crawley has Broadfield Park, Goffs Park, Southgate Park, Tilgate Park, West Green Park, Worth Park and on the doorstep Ifield Mill Pond and Bewbush Water Gardens. There are also 16 nature conservation areas which mean that all of Crawley residents have access to green space without using a car.
- 2) up to 5 infant and junior play facilities; The golf course provides for the physical health and mental health/ mental wellbeing of all its members; c500 including about 100 seniors and 50 ladies and all members can bring their junior family members, i.e. younger children or grandchildren, free of charge to the golf course so therefore this would not compensate. Last year alone it catered for c500 golfing members as well as 3940 green fee players and 1485 society players
- 3) a new sports hub comprising 3G and grass pitches; The Crawley BC PPS 'C' Table 7.2 page

108 says that there is currently 32% spare capacity of 3G pitches in Crawley and how will that help the golfers?

4) flexible recreation facilities, walking and cycling routes in-line with Active Design principles; This is the same as 1) above. And again how will that help the golfers?

5) up to 4 new tennis court / multisport facility. I do not need or want these; I play golf and Crawley BC PPS 'C' Table 8.7 page 127 says that there is currently 53% spare capacity of tennis courts in Crawley ; I am now too old to take up this sort of sport. These facilities can in no way be considered to make up for the loss of Ifield golf course which is arguably the best golf course in the area for quality costs and accessibility.

I started playing golf around 2005 and joined IGC in 2007. In that time I have improved my golf, from an absolute beginner, to a fairly competent golfer. IGC is only half a mile away from my house and easily walkable. If IGC were to close I feel I would probably give up golf as I value being a member of a golf club and the benefits that go with it. There are not any other member's courses within this area, the closest being Copthorne Golf Club, which, according to Google maps, is 5.4 miles from my house. The annual membership fees for Copthorne are [REDACTED] more than Ifield and they also have a [REDACTED] joining fee because they are near to capacity. As my husband is also a member of IGC this would cost us an extra [REDACTED] in our first year at Copthorne - money we do not have and assuming they could fit us in. The site is therefore not deliverable.

OBJECTION 5

HDC have included West of Ifield site HA2 in their local plan. This is not allowed because they cannot satisfy paragraph 99 of the NPPF as shown below.

Ifield Golf course is surplus to requirements. For this clause it is necessary to show that Ifield GC is surplus to requirements e.g. not needed, not required, redundant etc.

This is not true because it is Required by the 500 members of the only members club in Crawley.

Wanted by the 1485 society players and 3940 green fee golfers who played last year.

Needed as a quality golf course confirmed by the huge number of visitors as above.

Needed by the charities who benefit from the Captains, Ladies Captains and Senior Captains functions and competitions.

Needed by the 19 parties, 8 wakes, 18 other dinners, carvery lunches and Christmas events provided by the golf club caterers.

Wanted by people who want to play the whole range of competitive golf that makes a members club.

Required as the most accessible golf course in the area because you can get there by car, bike, foot, bus and train. Required if you want to store your trolley and clubs so that you can be picked up, dropped off, car share or use alternative means of travel.

Required to meet future demand.

There are many others.

Replaced by equivalent or better provision in a suitable location. It is a very difficult task to develop a golf course/club to the standard of Ifield Golf Club. Tilgate Forest Golf Centre has sat alongside Ifield GC for 50 years and despite having a driving range and until recently a lovely 9 hole par golf course its membership last year was only 120. Ifield golf course has prospered because of quality of the course in respect to design and layout; to its condition, pace of play, public on course, accessibility and cost of play.

Ifield golf club en bloc has taken years for Ifield GC to build up the wealth of in house competitions and local matches that would be impossible to match. With Tilgate GC adjoining the eastern boundary of Crawley, Ifield adjoining the western boundary and Gatwick airport the northern, there is no room for a golf course in a suitable location.

The development is for alternative sports and recreational provision. The development is for housing and clearly not for alternative sports or recreational provision. Sports and recreational provision are included in West of Ifield HA2 and Homes England have identified more of the same to outweigh the loss of Ifield Golf course. As stated previously, most of the extra provision is parks and green spaces for walking and cycling and infant and junior play facilities. There are

two facilities more suited for teenagers and young adults.

First is a new sports hubs comprising 3G and grass pitches but the Crawley BC PPS 'C' Table 7.2 page 108 says that there is currently 32% spare capacity for 3G pitches in Crawley. Next there are 4 new tennis court / multisport facilities but Crawley BC PPS 'C' Table 8.7 page 127 says that there is currently 53% spare capacity for tennis courts in Crawley. These facilities can in no way be considered to make up for the loss of Ifield golf course which is arguably the best golf course in the area for quality, costs and accessibility. There is nothing for Golfers! The site is therefore not deliverable.

TRANSPORT

I believe that the West of Ifield is undeliverable without first building additional infrastructure, and that the policy requirements in Chapter 2 & 9 of the National Planning Policy Framework (NPPF) September 2023 are not met:-

- The only new road from Rusper road to Ifield Avenue (existing roughly opposite Bonnets Lane) through the new development. No other new road infrastructure is planned. Plus 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.
- 3000 houses will likely mean, (at a conservative estimate) 4200 extra cars on our roads. This will mean a significant number of extra trips a day when 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 on top of additional traffic from continuing build-out at North Horsham and 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, and there is little provision for cycle parking
- Platforms at Ifield Station are narrow and very crowded at peak times. Train services from Ifield are infrequent, meaning some people will travel to Crawley and Three Bridges stations, further increasing congestion in those areas

HEALTH INFRASTRUCTURE

I believe that the local health infrastructure network is already under significant strain, will not cope with the impact of another 3000 houses (let alone 10,000!) in the area. Policies set out in Chapter 2 & 8 of the NPPF September 2023. are not adhered to by the HDC Local Plan.

- Policy HA2 requires the delivery of local healthcare facilities which as a minimum, meet the needs of the new occupants of the development which may include the appropriate provision of land, buildings and/or financial contributions and this is not accounted for in the viability study so is not deliverable
- There is uncertainty on the possible provision of healthcare facilities on the West of Ifield development and, if provided, how they will be staffed given the national shortage of medical professionals?
- There is already difficulty in accessing existing GP services with some surgeries having been unable to accept new patient registrations. 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 other surgeries, it's virtually impossible to find dentists taking NHS patients on in the area and pharmacies continue to close in Crawley
- East Surrey Hospital is frequently operating at maximum capacity with no available beds for patients requiring admission. No new hospitals are planned and there are already new developments in Horley which will also put additional strain on the hospital
- There is evidence of ambulances having to wait outside the A & E department at East Surrey Hospital to transfer patients, there is frequent vehicle 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 I have personally experienced long waits with my elderly mother on a trolley in a corridor of up to 8 hours and beyond and on one occasion overnight this really is unacceptable and will only worsen.

- The HDC Local Plan ignores the proven positive impact that open green space can have on residents physical and mental wellbeing and which will be impacted by the loss of rural environment if the WOI development proceeds

AIR POLLUTION

Air quality management areas (AQMA) have been declared in Crawley along Crawley Avenue and around Hazelwick roundabout (source <https://crawley.gov.uk/environment/environmental-health/airpollution/air-quality>) due to levels of nitrogen dioxide exceeding what is permitted. Increased traffic from West of Ifield will enter the AQMA if 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.

I believe that policies set out in NPPF September 2023 Chapters 2 & 8 are not met.

- More traffic 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 adverse birth outcomes (such as low birth weight) and 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.
- Those travelling within cars are also subjected to TRAP
- Proposed new flight paths from Gatwick would increase air pollution in the West of Ifield area, causing further negative impacts on the health of those in the area

WATER

Managing clean water supply, wastewater treatment, river quality and flooding for the Wol site present challenges. Present problems will be worsened by increasing the population in the area, by building on a greenfield site and by the impact of climate change. Nevertheless, HDC determined to press ahead with Wol with the developers being charged with delivering the necessary mitigations.

- Water supply is currently fragile (supplier - Southern Water). Water neutrality requires water demand in new builds to be offset against reduction of water use elsewhere and by the repair of leaks. Timetable and finances to deliver this offsetting are unforthcoming and uncertain
- Sewage. Without extensive improvements the Crawley wastewater treatment works will not be able to take further sewage. Thames Water's timetable and finances for improvements or extensions are uncertain
- River Quality. The River Mole will be the river that suffers. Most of it 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 is struggling to get on top of problems now
- Flooding. Crawley, 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 Wol site itself will increase with climate change. The Ifield Golf course is often subject to severe flooding where will all this water go? This could make floods more likely and evacuation routes more problematic. And should the dam at Ifield Mill pond break...!

HERITAGE

Heritage Assets are historical features that are valued. Wol 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 multimodal 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.

BIODIVERSITY

HDC's Local Plan 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 September 2023 paragraphs 174, 179 and 180 are contravened.

- Sussex Wildlife Trust (SWT) told HDC in 2020 that 'the Local Plan should not be taken forward as the significant effects on biodiversity have not been quantified and are poorly understood. ... 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 District

- The West of Ifield 3,000 house site is rich Low Weald habitat - copses of mature Oak, Ash and Hornbeam, thick ancient hedgerows, and the river Mole and Ifield Brook. With over 30 ha of 'ancient woodland' - designated by Defra - on the site or immediately adjacent to it, plus another 30 ha of 'priority woodland'. That's why 75% of the site is identified as Biodiversity Opportunity Area. But all extremely threatened

- Ifield Brook Meadows - designated Local Wildlife Site - will be sandwiched between the densest part of West of Ifield and the urban edge of Crawley. Homes England plans to cover it with cycleways and footpaths, and maybe even convert it into a park and playground. This means catastrophic biodiversity loss from this site

- Ecologists have recently discovered colonies of rare and highly protected Bechstein's bats on and around the site, linked with colonies in Surrey. Legislation says that the area should be

considered for designation as a Special Area of Conservation. This is solid evidence that SWT is right - the District's habitat is under-recorded, under-designated and under-protected. And the Bechstein's at West of Ifield are an excellent example. But HDC and Homes England are downplaying the significance of these findings and the value of the area

- Similarly, HDC don't acknowledge that much of the Upper Mole Valley is in Ruisper parish, and that the river, hedgerows and woodland are excellent wildlife corridors up into Surrey. Wildlife doesn't respect human boundaries - but the Plan doesn't mention any collaboration with Mole Valley District Council, or the great work being done by the Gatwick Green space Partnership. But then HDC isn't interested in this corner of the District - so much for Wilder Horsham District!

- 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

HOUSEBUILDING NUMBERS

The Plan is required to set out the Council's 30 Year Vision, but this is completely missing - probably because the HDC's Plan to build c800 new houses a year is unsustainable and cannot continue.

- Horsham now has one of the fastest rates of population growth in the south-east, only surpassed by Ashford, Maidstone and Dartford. All completely unsustainable and loading yet more pressure on water supply, sewage infrastructure, roads, hospitals, etc.

- Shockingly this growth is the result of excessive house-building. Deliberate over-supply, with marketing to create demand from people outside the area, investors buying to rent, and even marketing to overseas investors. As a result, over 80% of Horsham's population growth is due to people moving into Horsham - from Crawley (25% of net inward in 2019), south London, Surrey, and other south-east areas

- House-building here has almost nothing to do with satisfying local need. If it did HDC would only build 400 a year, and a very significant number would be genuine social housing, i.e. 60% of market rents.

- Instead the building we get satisfies the developers' need for profit. And they won't deliver social housing, or even truly affordable housing. It's time to stop pushing so much, and the wrong type of housing into the south-east, because it's profitable for developers

JOBS

One of HDC's justifications for placing 3000 new houses at the edge of Crawley is the availability of jobs at Gatwick and in Crawley. However:-

- Gatwick is unlikely to provide these new jobs as roles continue to be lost to automation (check in/passport control/baggage handling etc), and further expansion is uncertain

- Plus, Gatwick jobs tend to be lower paid and not a match for the price of housing that will be delivered

- A lot of the office space in Manor Royal has been lost to warehousing. The trend for online shopping feeds this change. Warehousing jobs are also low paid and will not be a match for the housing that will be delivered #

- Crawley is struggling for space to build new workplaces, as evidenced within its own Local Plan (Topic Paper 5 Employment Needs and Land Supply)

IN SUMMARY

I think anyone considering the factors raised in my letter, either collectively or individually,

should have no problem in realising that the West of Ifield should not be included in the HA 2 policy and instruct HDC to redo their 30 year plan without it.

It says an awful lot that the Crawley Borough Council is also dead set against this development but do not have any say in a development that will hugely impact on Crawley with all of the benefits being reaped by HDC i.e. council tax!

There is also nothing mentioned in West Sussex County Councils budget for any new roads to alleviate congestion in or around Crawley, so obviously no consultation has gone on there either.

Yours faithfully

[REDACTED]

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



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