



The countryside charity
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Attn: Case Officer Mr J Hawkes

Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

27 October 2025

Dear Mr Hawkes,

CPRE Sussex representation Objecting to:

DC/25/1312

Land West of Ifield Charlwood Road Ifield West Sussex

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. |

Our reasons for objecting to this application are explained below.

In summary, CPRE Sussex considers that the proposed scheme is not consistent with the three overarching Economic, Social and Environmental objectives required by the planning system (NPPF paragraph 8). The scheme is not sustainable.

1. The Site was allocated in HDC's Regulation 19 Horsham District Local Plan 2023 – 2040: Strategic Policy HA2 Land West of Ifield.

1.1 The Examination in Public (EiP) of the Plan commenced 10 Dec 24.

1.2 Whether the strategic sites allocated in the Plan and associated policies were justified, effective, consistent with national policy and positively prepared, including Policy HA2 Land West of Ifield, was to have been considered at the EIP: Hearing Day 9 –Thursday 16 Jan 25, 0930 to 1300, 1400-1700.

1.3 The EiP was suspended after only three days (10th, 11th and 12th Dec 24) and subsequently rejected by the examining Inspector.

1.4 Consequently, whether HDLP Policy HA2 Land West of Ifield, and associated policies were justified, effective, and consistent with national policy and positively prepared was not considered.

1.4.1 The applicant's Planning Statement (incl. Affordable Housing Statement) July 2025, omits to acknowledge this reality.

2. CPRE Sussex objected to the proposed allocation of Land West of Ifield in the HDLP 2023 - 20240. Our objection is accessible at <https://www.cpresussex.org.uk/news/cpre-sussex-response-to-horsham-district-local-plan-2023-40-regulation-19/>

2.0.1 HDC's Strategic Policy HA2 Land West of Ifield's Sustainability Appraisal was incomplete, lacked essential information and detail, and was therefore inadequate and not proportionate, contrary to NPPF Policy 31 (September 2023) and NPPF Policy 32 (NPPF December 2024 as amend February 2025) stipulation that plan policies should be underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the policies concerned.

Biodiversity, Ecology and the Natural Environment

3. The destructive impact that the proposed development would have on the natural environment within and outside of the targeted area is explained in detail by the Sussex Wildlife Trust (SWT) in their objection in principle to the application (SWT letter to HDC/Jason Hawkes re DC/25/1312, dated 1 October 2025).

3.1 CPRE Sussex supports the SWT's concerns and comments, and conclusions including that

“adequate mitigation and compensation has not been provided, and the reasons for development cannot be considered to be wholly exceptional given that there are other sites available. As such, Paragraph 193 of the National Planning Policy Framework (NPPF) is clear that permission should be refused”. And that:

“the application does not conform to Horsham District Planning Framework (HDPF):

Policy 25 - The Natural Environment and Landscape Character

Policy 26 – Countryside protection

Policy 31 - Green Infrastructure and Biodiversity

Policy 33 - Development Principles

Policy 35 - Climate Change

Policy 38- Flooding"

4.1 The West Sussex Local Habitat Map, compiled by the Sussex Nature Partnership, shows how habitats within the Site relate to the wider area:

https://experience.arcgis.com/experience/d51975866ca1413d927e74f701fdb8a0/page/Page?views=Map-Layers#data_s=id%3AdataSource_2-1998559399f-layer-52%3A21

5. “The application contains inadequate environmental assessments which do not consider impacts on aquatic habitats”

5.1 We note the Environment Agency’s concerns, detailed in their response to the application (letter to HDC/Jason Hawkes, dated 25 Sep 25; their HA/2025/127053/01). Concerns include

“The application contains inadequate environmental assessments which do not consider impacts on aquatic habitats. Negative impacts on aquatic habitats have been overlooked within the assessments for WFD, Biodiversity Net Gain (BNG) and the Environmental Statement, with a lack of adequate mitigation and enhancements proposed”.

“In addition, **some of or all the proposals will require a Flood Risk Activity Permit(s) under the Environmental Permitting (England and Wales) Regulations 2016 which is unlikely to be granted with the current level of detail being provided**” (page 2).

“**The WFD assessment (section 5.4.1) states “The Site’s existing wetland habitats, including Ifield Brook and the River Mole, would be maintained”. This is not correct, since river habitats will be permanently degraded due to the proposed bridge crossing, in addition to the permanent loss of existing floodplain habitats, including wetlands.** These include both floodplain areas impacted by the proposed bridge embankments, as well as existing wetlands at the northeast of the site from approximately TQ2420637771 to TQ2505038351, which will be lost due to the proposed access road”(page 3).

“**We are concerned that the BNG assessments have not been prepared in line with ‘The Statutory Biodiversity Metric User Guide’, including lacking adequate baseline or post-development assessments of watercourses, and proposals for adequate BNG uplift for all watercourse types. Additionally, encroachment due to the proposed bridge and drainage outfalls have not been captured. The BNG assessments should be revised to comply with ‘The Statutory Biodiversity Metric User Guide’ and the following comments**” (page 4).

6. The EA's response and criticism bring into contention the Planning Statement (incl. Affordable Housing Statement) states that:

“Chapter 8 of the Environmental Statement outlines the likely biodiversity effects to arise from the demolition and construction and the completed development stages of the Proposed Development. **The scope and methodology has been reviewed by HDC, Natural England and the Environment Agency during the preparation of the Environmental Statement**” (7.14.2).

6.0.1 Evidently not.

Affordable Homes: financial viability, and whether a Registered Provider can be engaged to deliver and manage the affordable homes is not assured

7. West of Ifield was allocated for development in the Regulation 19 HDLP 2023-2040: Strategic Policy HA2 Land West of Ifield.

7.1 Strategic Policy HA2 stipulated a minimum 40% affordable housing, “given the particular housing needs evidenced in the Crawley Borough Local Plan 2024-2040 and a legacy of public land ownership” (paragraph 10.38).

7.2 And that “the development is expected to provide 70% of the total as social rented and/or affordable rented properties. The remaining 30% should be low-cost home ownership, to include shared ownership and/or First Homes” (10.39).

7.3 And “given the high cost of rented properties in the District and an ongoing shortage of supply, together with the increased cost of living, the Council’s preference is for the delivery of socially rented homes” (paragraph 10.39).

8. Notwithstanding that the allocation of the Site in its Regulation 19 HDLP 2023-2040: Strategic Policy HA2 Land West of Ifield (Dec 2023) was contingent on the development delivering 40% (1200) affordable housing, Homes England has chosen to offer 35% (1050) with no commitment to 70% social rented and or/affordable rented properties.

8.1 The applicant’s Planning Statement (incl. Affordable Housing Statement) advises that

“The Proposed Development seeks to deliver up to 3,000 homes, of which 35% (1,050 homes) will be provided as affordable homes” (7.3.13).

“It is anticipated that a Registered Provider will be engaged to deliver and manage the affordable homes in partnership with HDC. Detailed discussions regarding the delivery mechanism, location and tenure mix will be undertaken at the RMA

Stage, once overarching principles of affordable housing provision have been agreed with HDC" (7.3.14).

"The provision of affordable housing will be secured by the Section 106 Agreement" (7.3.15).

9. Since it is Homes England's intent that affordable housing for West of Ifield is to be secured by a Section 106 Agreement, the actual number of affordable homes delivered will be dependent on financial viability.

9.1 Accordingly, the 35% affordable housing offered by the applicant is likely to be reduced at the Reserved Matters' stage on grounds of financial viability, which seems likely given the enormous scale and consequent cost of the proposed scheme.

9.2 After all, although the HDPF 2015 allocation Land North of Horsham was contingent on the delivery of 35% affordable homes this was subsequently reduced to around 18% on grounds of viability.

10. Whether a Registered Provider can be "engaged to deliver and manage the affordable homes in partnership with HDC" is not assured.

10.1 Research by the Home Builders' Federation (HBF) by means of FOI requests to Local Authorities in England and Wales in June 2025, report published 1 October 2025:
<https://www.hbf.co.uk/news/uncontracted-section-106-affordable-homes-october-2025/> found that:

- Across a sample of 105 Local Authorities, there are 302 completed Section 106 Affordable Homes that currently remain unsold due to the absence of a contract with a Registered Provider.
- There are at least 2,254 Section 106 Affordable Homes across 84 Local Authorities that are either under construction or due to commence construction within the next 12 months that are not currently under contract with a Registered Provider.
- Approximately 228 sites have been delayed or stalled across 103 Local Authorities in the past three years due to the absence of a contract with a Registered Provider.

Extrapolating the data for all 317 Local Authorities across England and Wales, we can estimate that:

- There are **approximately 900 completed Section 106 Affordable Housing units that remain unsold** due to the absence of a contract with a Registered Provider.
- There are **around 8,500 Section 106 Affordable Housing units that are either under construction** or due to commence construction within the next 12 months and are **not currently under contract with a Registered provider**.
- **More than 700 sites have been delayed or stalled** in the past three years due to developers' inability to secure an RP to acquire the Affordable units.

“The results highlight that developers continue to face significant constraints in delivering both Section 106 Affordable Homes and market-sale units”.

The Crawley WwTW – Contrary to Homes England’s understanding the existing foul water network does not have sufficient capacity to support the proposed development

11. Foul water from the proposed scheme will be treated by the Crawley WwTW.

12. The applicant’s Planning Statement (incl. Affordable Housing Statement) states that: “Discussions with Thames Water has confirmed sufficient capacity within the Crawley WwTW and identified a number of capacity improvements to the strategic foul water network to meet future demand from Ifield and other development from across north Horsham and Crawley area (paragraph 7.17.5).

13. Thames Water, however, is adamant that “the existing foul water network does not have sufficient capacity to support the proposed development (Thames Water’s letter to HDC Planning re DC/25/1312, dated 25 September 2025).

13.1 In their letter, Thames Water informs HDC that they have “identified that the existing Foul Water network does not have sufficient capacity to support the proposed development” and request that “the following condition be attached to any planning permission granted:

The development shall not be occupied until confirmation is provided that either:

1. All necessary upgrades to the foul water network to accommodate additional flows from the development have been completed; or
2. A phasing plan for development and infrastructure, agreed with Thames Water and the Local Planning Authority, is in place. Where such a plan exists, no occupation shall occur other than in accordance with the approved phasing schedule”.

14. Furthermore, the Draft Crawley Borough Local Plan 2024 – 2040 May 2023 for Submission Publication Consultation: May – June 2023, paragraph 8.11 advised that:

The Water Cycle Study Crawley Borough Council Addendum Final Report (January 2021) “Identifies that the flow permit for Crawley Wastewater for Crawley Wastewater Treatment Works is likely to be exceeded towards the end of the 2025-2030 period”.

“Thames Water has confirmed that the works is close to its treatment capacity, and will exceed its permit during the Local Plan period”

“Wastewater/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build”.

“In the event of an upgrade to sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade”.

14.1 Note that the Water Cycle Study Crawley Borough Council Addendum Final Report (January 2021) referred to and quoted in the ‘Submission Publication Consultation’ document (quoted above) **did not take into account the additional treatment capacity that would be required in consequence of the proposed West of Ifield scheme.**

15. **Thames Water should be asked to provide HDC with details of their intention re the Crawley WwTW, including timings for completion and phasing of upgrades.**

Water Neutrality: “there are concerns about the achievability of the projected yields from the proposed private water supply system”

(Environment Agency, letter to HDC, reference HA/2025/127053/01, dated 24 Sep 25)

16. **The applicant’s Planning Statement (incl. Affordable Housing Statement) advises that:**

“A Water Neutrality Statement has been prepared by WSP in support of this HPA to demonstrate how the Proposed Development will achieve water neutrality within the Sussex North WRZ. The approach maximises the use of on-site water resources and aligns with best practice in sustainable development principles and water neutrality” (para 7.11.22). And that:

“The proposed water neutrality strategy will offset the entire demand from the Proposed Development. On this basis, the Proposed Development will not increase water abstraction from the Sussex North WRZ, it will achieve water neutrality” (para 7.11.23).

17. **The applicant’s Water Neutrality Statement, July 2025, states that the “total water demand for the development is calculated as 710,328 litres per day”** (Executive Summary).

17.1 **However, this water demand figure is contradicted by the advice at page 16 of the Statement that: “The baseline water demand of the proposed development is calculated to be up to 967,661 litres per day” and “in addition, the water demand of the proposed development will be increased by 16,222 litres per day for the first 14 years due to construction activities”; therefore 983,883 litres per day in total.**

17.2 Clarification is needed.

18. **The Water Neutrality Statement in summary advises that Water Neutrality will be achieved by a combination of:**

-Demand Reduction: All residential units will be designed to achieve a maximum per capita consumption (PCC) of 85 litres per person per day’.

-Water Reuse: Rainwater harvesting systems will be implemented to meet irrigation needs for allotments and landscaped podiums.

-Offsetting by:

--Ceasing existing water use at the Ifield Golf and Country Club (10,420 litres per day).

--An allocation of Sussex North Offsetting Water Scheme (SNOWS) credits equivalent to 1,600 residential units, representing 304,640 litres/day (Water Neutrality Statement July 2025: Executive Summary).

--The remaining demand of 395,268 litres per day will be met through a private water supply system blending groundwater from the Upper Tunbridge Wells Sand Formation with harvested rainwater and treating it to potable standards.

19. The Environment Agency in their response to DC/25/1312, dated 24 Sep 25, reference HA/2025/127053/01, advise that

“Appendix F of the Water Neutrality Statement describes the exploratory drilling and testing at several boreholes. Yields were relatively small and only tested at low rates from exploratory boreholes. Variation in the lithology and strata thickness limits the reliability of data, and there are concerns about the achievability of the projected yields. Further tests of multiple larger-diameter boreholes would be needed to provide confidence that the projected demand could be supplied from a private system located near the site” (paragraph 10).

20. Whether Water Neutrality can be achieved by the proposed scheme is unproven and is therefore in doubt.

21. We draw attention to the High Court Judgment

[Crest Nicholson Operations Ltd v Secretary of State for Housing, Communities and Local Government & Anor \[2025\] EWHC 2194 \(Admin\)](#) (22 August 2025)

Between **Claimant**: Crest Nicholson Operations Ltd and **Defendants** (1) Secretary of State for Housing Communities and Local Government (2) Horsham District Council. Hearing date 22 July 2025.

22.1 Planning Resource’s summary (9 Sep 25) of the Judgment:

<https://www.planningresource.co.uk/article/1931782/court-dismisses-challenge-ministers-water-neutrality-planning-condition-homes-scheme> includes the following:

“A minister was entitled to impose a planning condition preventing the occupation of a housing scheme (Land at Kilnwood Vale, Faygate, Horsham) in West Sussex until water neutrality arrangements had been agreed, the High Court has found”.

“The court dismissed housebuilder Crest Nicholson's legal challenge against the condition relating to a 280-home scheme on the western edge of Crawley. The firm had appealed against Horsham Council's non-determination of the application. The application was later recommended for approval by a planning inspector and then [approved by the secretary of state.](#) “

“In line with the inspector's recommendation, the minister's consent included a condition - condition six - stipulating that no home could be occupied until a “water neutrality mitigation scheme” had been secured via Horsham Council's adopted water neutrality offsetting scheme; or a “site-specific water neutrality mitigation scheme” had been agreed in writing with the council as being equivalent to the offsetting scheme and implemented in full”.

23. CPRE Sussex is aware of the Government's intent to remove existing 'water neutrality restrictions' from 1st November 2025.

24.1 We draw attention to Nicholls Water Credit's letter/email to Emma Parkes/HDC re Procedural Safeguards for Water Neutrality Policy Changes, dated 17 Oct 25, which outlines the company's concerns and recommendations regarding the transparency, consistency, and ecological integrity of the evolving policy framework.

24.2 Recommendations include the suggestion that a transitional period may be appropriate, during which: Water neutrality requirements introduced following Natural England's 2021 Position Statement continue to apply until

- Natural England formally withdraws that Statement with published supporting evidence
- Independent peer review of the new evidence is completed and published
- Specific, legally binding mitigation commitments are documented and implementation has commenced
- Independent verification mechanisms are operational.

25. Meantime, we suggest that as a precautionary measure the requirement for DC/25/1312 to achieve water neutrality be retained.

Impact of aircraft noise understated

26. How noise emitted by aircraft taking off and climbing away from the airport and landing and taxiing could or would impact on the health, wellbeing, amenity and quality of life of the residents of the proposed scheme's 3000 new homes, and Gypsy and Traveller pitches, and pupils and staff at the scheme's proposed school should be a major consideration for Horsham District Council and its decision takers.

26.0.1. "Aircraft noise is the primary environmental concern for communities around the UK's major airports, and residents are increasingly dissatisfied with levels of noise around where they live".

26.0.2 "Aircraft noise can no longer be considered only as an inconvenience in people's lives. Major studies and reviews have concluded that aircraft noise is negatively affecting health and quality of life, even when other factors are taken into account".

26.0.3 "Exposure to aircraft noise can lead to short-term responses such as sleep disturbance, annoyance, and impairment of learning in children, and long-term exposure is associated with increased risk of high blood pressure, heart disease, heart attack, stroke and dementia. There is evidence to suggest that aircraft noise may also lead to long-term mental health issues."

(Aircraft Noise and Public Health: The Evidence is Loud and Clear'. Report commissioned by HACAN (Heathrow Association for the Control of Aircraft Noise) and the Aviation Environment Trust from the Aviation Environment Federation, published January 2016).

(See also UK Civil Aviation Authority Aircraft Noise and Health Effects – six monthly updates. The most recently published update is at <https://www.gov.uk/guidance/noise--2>)

27. NPPF Paragraph 187 stipulates that: Planning policies and decisions should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

28. The Site is located c.1km from Gatwick Airport (the distance between sites northern boundary and Gatwick's southern boundary).

28.1 Surprisingly, the applicant's Design and Access Statement 3: The Site, paragraph 3.1.1, Figure 24 mistakenly positions the Site 'approximately 7.8 miles from Gatwick'. Geo Spatial confusion perhaps?

29. Plans for a second runway at Gatwick were approved September 2025.

29.1 Gatwick currently handles about 280,000 flights a year and has said that the second runway would allow that number to rise to around 389,000 by the late 2030s (<https://www.bbc.co.uk/news/articles/c9v7rz24z23o>)

29.2 Aircraft land and take-off at the airport 24hrs per day, 7 days per week <https://www.gatwickairport.com/flights>

29.3 280,000 flights per year = an average of 767 flight per day, therefore an average of 32 per hour.

29.3 389,000 flights per year = an average of 1066 per day, therefore an average of 44.5 per hour.

30. Environment Statement Volume 1 Main Report: Chapter 12: Noise and Vibration
states: “The Proposed Development masterplan has been designed to not place residential development within the 60 dB(A) Leq,16hour Gatwick aircraft noise contour, when considering the Second Runway Option 3 (Wide Spaced Mixed Mode) No EATs 2050 Leq 54-72 dB(A) Contours” (12.10.83).

30.1 This statement is caveated with the advice that “It should be noted that when considering the Gatwick Airport 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours, some of the proposed residential development parameters would fall just within the 60 dB(A) Leq,16hour” (12.10.84).

30.2 The referred to noise-level contours are those shown on the Environment Statement’s Figures

Figure 12.3: Gatwick Airport 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours Daytime overlain on the Proposed Development’s built infrastructure parameters (page 40), transposed screen shot below.

Figure 12.4: Gatwick Airport 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours Night-time overlain on the Proposed Development’s built infrastructure parameters, transposed screen shot below:

Daytime

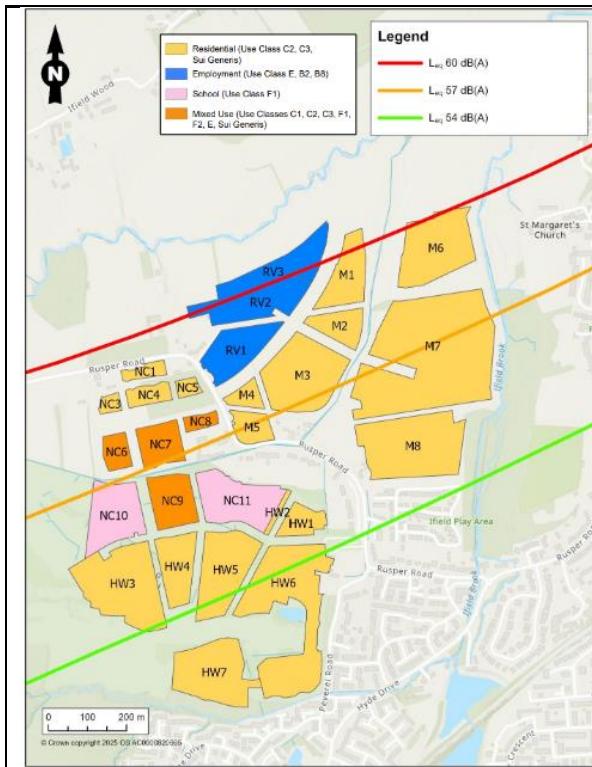


Figure 12.3: Gatwick Airport 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours Daytime overlain on the Proposed Development’s built infrastructure parameters

Night-time

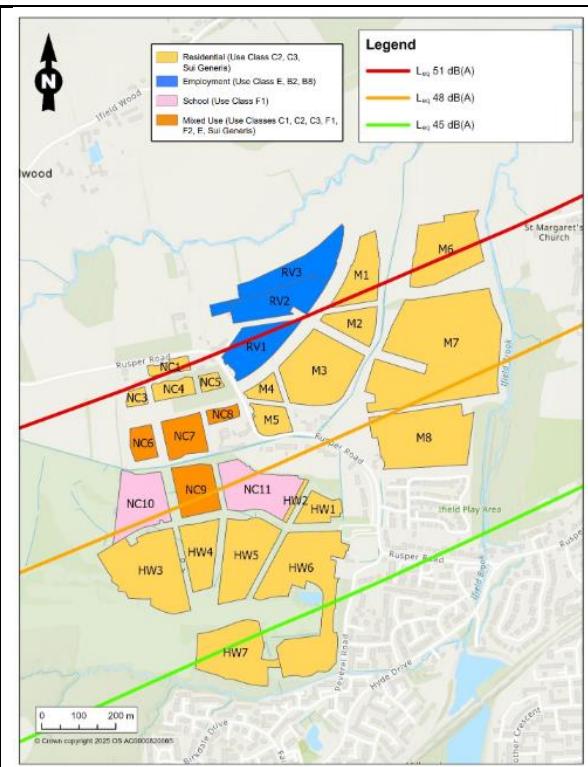


Figure 12.4: Gatwick Airport 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours Night-time overlain on the Proposed Development’s built infrastructure parameters

30.3 The daytime noise contours show that the greater part of the proposed scheme would be located between aircraft noise contours 60 and 57 and 57 and 60 dB(A) Leq,16hour.

30.4 The night-time aircraft noise contours show that the greater part of the proposed scheme would be located between noise contours 51 and 48 and 48 and 45 dB(A) Leq,16hour.

31. How these noise level contours were determined, including how noise measurements were obtained and over how many days and from where and when is not clearly explained.

31.0.1 Do they provide an accurate and reliable representation of noise levels that would be experienced on the ground by the proposed scheme's residents?

31.0.2 Are they derived from the Baseline Noise Survey undertaken in 2022: 28th June to 7th July?

32. Environmental Statement Volume 2: Technical Appendices Technical Appendix 12.3: Baseline Noise Survey provides actual noise levels measured at locations across and close to the proposed development site:

“The baseline noise survey comprised long-term unattended noise monitoring measuring continuously between Tuesday 28 June and Thursday 7 July 2022 at four locations and short-term daytime and night-time attended measurements undertaken at eight locations within the above survey period” (page 2).

33. The locations at which noise emissions were measured are detailed at page 3, Figure 1 Measurement Locations: screen shot below.



Figure 1: Measurement Locations

33.1 A summary of noise levels at each unattended locations LT1, LT2, LT3 and LT4 is presented in Table 5 to Table 8 (pages 6 to 8).

33.2 Daytime and night-time attended measurements at locations ST1 to ST8 are presented in Table 9 and Table 10 respectively (pages 9 and 10).

34. Measured Noise levels for each location are summarised as follows:

Location	Dates	DAY Max/Min dB	NIGHT Max/Min dB	Source: Table
LT 1	28/06 to 3/07/22	90/80	89/67	5, page 6
LT 2	28/06 to 7/07/22	80/71	82/68	6, page 7
LT 3	28/06/ to 7/07/22	92/67	81/66	7, pages 7,8
LT 4	28/06/ to 7/07/22	101/79	82/74	8, page 8

Location	Dates	DAY Max/Min dB	Dates	NIGHT Max/Min dB	Source: Tables
ST 1	28/06/22	88/66	29/06/22	82/67	9 & 10, page 9
ST 2	28/06/22	67/64	7/07/22	68/65	9 & 10, page 9
ST 3	28/06/22	69/66	7/07/22	67/66	9 & 10, page 9
ST 4	28/06/22	78/66	29/06/22	59/52	9&10, pages 9, 10
ST 5	7/07/22	81/63	29/06/22	67/64	9&10, pages 9,10
ST 6	7/07/22	66/63	29/06/22	71/66	9&10, pages 9, 10
ST 7	7/07/22	76/64	7/07/22	65/59	9&10, pages 9,10
ST 8	7/07/22	65/60	7/07/22	53/52	9&10. Pages 9,10

35 Day time noise levels measured at positions LT1, LT2, LT 3 and LT4 are all greater than the noise contours shown on Figure 12.4. Likewise, the measured night-time noise levels.

35.1 Daytime noise levels measured at ST 2, 3, 4, 5, 6, 7 and 8 are greater than the noise contours shown on Figure 12.3

36. Night-time noise levels measured at ST 2, 3, 5, 6, 7 and 8 appear to be greater than the noise contours shown on Figure 12.4.

36.1 The minimum night-time noise level, 52 dB, measured at ST 1 seems to correlate with the 51 dB contour.

37. With the partial exception of ST 1 the measured Day and Night-time noise levels appear to be greater than the noise contours shown on Figures 12.3 and 12.4.

38. There is a substantial mismatch between the noise measurements obtained by the daytime and night-time surveys conducted in 2022, between c June and 7 July, and the noise contours shown on Figures 12.3 and 12.4 of the applicant's Environmental Statement Volume 1 Main Report: Noise and Vibration.

38.1 Further on-site measured aircraft noise surveys are therefore essential.

39. The Baseline Noise Survey results bring into contention the Environment Statement Noise and Vibration statement that: "It is unlikely that there will be cumulative completed development aircraft noise effects (specifically regarding the Gatwick Airport Northern Runway DCO) as during the daytime, all development plots lie outside of the 2038 N65 Day contour from Gatwick Airport where significant effects could occur" (12.13.4).

39.1 The results of the Baseline Noise Survey indicate that contrary to the statement quoted, it is highly likely that there will be cumulative completed development noise effects arising from aircraft taking off from and landing on the north and south runways, which will have adverse effects on the health, wellbeing and amenity of the proposed West of Ifield development's residents. Buyer Beware.

40. Note that 'UK Air Navigation Guidance (ANG)' regards 51dB LAeq16hr for daytime noise and 45dB Lnight 8hr for night-time noise as the levels at which aircraft noise annoyance occurs.

40.0.1 World Health Organisation (WHO) guidelines (2018) concluded that health effects can occur at lower levels of 45dB Lden and 40dB Lnight' And that

40.0.2 'noise annoyance can occur below 51dB LAeq16hr yet it is not known how many people around UK airports may be adversely affected at these lower levels' (Health impacts of aircraft noise – a UK communities' perspective Paul Beckford1, Coordinator, HACAN2 (Heathrow Association for the Control of Aircraft Noise) Inter.noise Glasgow 2022).

(See also UK Civil Aviation Authority Aircraft Noise and Health Effects – six monthly updates. The most recently published update is at <https://www.gov.uk/guidance/noise--2>)

41. This brings into contention HDC's and Homes England's understanding that exposure of residents to noise levels less than 60dBLAeq16hr and Gypsy Traveller

accommodation less than 57 decibels would not be detrimental to health; for example:

HDLP Strategic Policy HA2 (6) advised that that “A full noise impact assessment and mitigation strategy is submitted and agreed by the Council, which demonstrates that aircraft noise has been assessed and its impacts mitigated across the whole development. No residential or other noise sensitive uses are permitted anywhere on the site considered to be exposed to current or potential future aircraft noise level, which is above 60dB LAeq, 16hr; Gypsy and Traveller accommodation should be located where noise impacts are not in excess of 57 decibels reflecting the lower level of acoustic attenuation provided by caravans”.

42. Contrary to the applicant, and apparently HDC’s understanding, the proposed scheme’s residents may well be exposed to aircraft noise at levels harmful to their health, wellbeing and amenity – noise levels in the Noise Exposure Hierarchy that will be significant, present and intrusive:

“The noise causes a material change in behaviour, attitude or other physiological response, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area”.

<https://www.gov.uk/guidance/noise--2>

43. The approach to this vital issue should be Precautionary.

In conclusion, CPRE Sussex asks that DC/25/1312 be refused for the reasons explained above.

Yours faithfully,

Dr R F Smith, DPhil, BA (Hons) FRGS

Trustee CPRE Sussex

Copy to: Chair CPRE Sussex