

**From:** Planning@horsham.gov.uk <Planning@horsham.gov.uk>  
**Sent:** 13 October 2025 13:42:28 UTC+01:00  
**To:** "Planning" <planning@horsham.gov.uk>  
**Subject:** Comments for Planning Application DC/25/1312  
**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 13/10/2025 1:42 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

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### Customer Details

Address:	Sweet Briar Horsham Road Rusper
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## Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	<ul style="list-style-type: none"><li>- Highway Access and Parking</li><li>- Other</li><li>- Overdevelopment</li></ul>
Comments:	<p>I object to planning application DC/25/1312 West of Ifield (Wol). My main objection is because the Water Neutrality Statement is not compliant with regulation. Also my objection is in connection with Waste Water Treatment, Traffic (including Crawley Western Multi Modal Corridor) and Rusper's Made Neighbourhood Plan.</p> <p><b>Water Neutrality (WN)</b> The WN Statement ref WOI-HPA-DOC-WNS-01 is not sound because overoptimistic water demand savings and uncertain water supply sources combine to create a high risk the Wol development will not achieve water neutrality. The WN Statement is not therefore compliant with The Conservation of Habitat's and Species regulation 2017:</p> <p><b>Water demand</b></p> <ul style="list-style-type: none"><li>- residential demand is based on unsubstantiated assumptions that produce over 30% reduction in per capita consumption compared with current norms and to consumption levels well below Local Authorities optional tighter standard for new dwellings (ref; Government Building Regulations)</li><li>- commercial water demand is based on theoretical assumptions that produce 40% reduction in consumption compared to government guidelines of 15% reduction (ref; Government Environmental Improvement Plan 2024)</li></ul> <p><b>Water supply and offsetting</b></p> <ul style="list-style-type: none"><li>- two sources of private water supply (rain water harvesting and ground water from deep bore holes) are uncertain with no more than outline infrastructure requirements for capture, extraction, storage and processing, and the amount of water available from each is speculative and unspecified</li><li>- existing developments available for offsetting have not been identified and sufficient numbers of offsetting houses may be in doubt in view of HDC's flawed water neutrality strategy that excluded several thousand houses from its planned provision required to demonstrate neutrality instead of those houses being available for offsetting credits (ref; Fry-v-Somerset CC High Court judgement June 2023)</li></ul> <p>Three revisions to the Wol planning application are required to minimize the risk of not meeting legally binding environmental regulation and also to comply with The Planning Practice Guidance (ref; PPG para 003) that states 'an appropriate assessment must contain complete, precise and definitive findings</p>

and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project'

(i) Improvements to the integrity of the WN Statement

There are misleading statements and factual and quantitative errors in the Statement that serve to undermine the integrity of the proposal. Three standout examples are:

Misrepresentation of Natural England's endorsement of the Sussex North WN Mitigation Strategy (September 2021);

- the endorsement was conditional on proper implementation
- it also preceded the Fry-v-Somerset High Court judgement

A spurious baseline assumption for residential water consumption of 110 l/p/d that underestimates required savings and omits the means of achieving neutrality;

- that baseline assumption is HDC's Planning Framework target for new developments whereas the baseline is intended to represent current norms (between 125 and 135 l/p/d) against which consumption plans will be compared

- efficient fittings are the means of reducing demand to the Guideline 110 l/p/d and flow control devices are a means of ensuring against deterioration, counting these as the means of reducing demand from 110 to 85 l/p/d is double counting

An incorrect statement in the Executive Summary of the Wol Development's water demand due to a miscalculation of one category of savings that is deducted from gross consumption;

- total water consumption is 710328 l/p/d net of rain water harvesting used for one purpose

(ii) Use of realistic assumptions for calculating both water demand and water supply:

- calculate the dominant residential demand (75% of total) from what could be achievable compared to current norms with conservative assumptions and taking account of deterioration and other obvious consumer practices like running bath water taps for longer

- use conservative assumptions for calculating non-residential demand in the light of the absence of reference data and instead of aspirational BREEAM new Construction Standard credits that produce overambitious demand reductions

- provide substantive evidence to support the feasibility and the forecasts of water volumes from the two sources of private supply in place of overview schemes and speculative, imprecise water volumes, otherwise downgrade the forecast of water volumes to reflect the high degree uncertainty that may be achievable from those private sources

- identify and confirm existing developments available to provide offsetting (SNOWS) after priority allocation to stalled developments and HDC's affordable housing plans have been met and match the total with the planning assumption

- remove Ifield Golf Club's water consumption from water savings because the assumption that facility will close is premature and in the event it is closed its water consumption should be reserved for

alternative facilities or upgrading other facilities

(iii) Monitoring infrastructure and control systems to be made an absolute imperative of the planning application

The WN Statement and supporting documents look contrived to fulfil a pre-determined intention to demonstrate neutrality and in that way get round a regulatory obstacle. The WN Statement consequently has doubtful integrity and the over optimistic demand assumptions and uncertain supply assumptions indicate a high risk water neutrality will not be achieved.

To counterbalance that risk HDC has a duty to ensure compliance with the Habitats Regulation by demonstrating neutrality is achieved and maintained and to hold the developer accountable for fulfilling its neutrality commitments.

Demonstrating neutrality is achieved and maintained requires installation of metering infrastructure to record mains water supply onto the Wol estate, plus metering to record Wol's share of water consumption reductions on offsetting sites, metering supply from ground water bore holes and rain water harvesting schemes.

Accountability systems to include periodic neutrality calculations balancing mains water supply from Southern Water, offsetting credits and private water supply set against total water consumption. Pre-determined penalties and the right to suspend or cancel building phases of the development in the event commitments are breached.

#### **Waste Water Treatment**

The treatment centre at Crawley is operating close to capacity and is unlikely to be able to cope with additional sewage from the Wol estate.

Although Thames Water has a statutory duty to provide treatment facilities for Wol, HDC has a duty nonetheless to ensure Thames Water will be able to cope with the additional sewage and not create a risk of environmental pollution. To this date HDC has been silent on the issue.

Planning consent should not be considered before HDC has made a full assessment of available capacity for waste water treatment and in the event of a shortfall, consent should not be given consideration until Thames Water has come up with a solution.

#### **Traffic (including Crawley Western Multi Modal Corridor)**

It is self-evident that the impact of additional traffic from the three strategic developments in the vicinity of Ruster Parish (Kilnwood Vale, North Horsham and Wol) on the rural roads in and around the Parish will be cumulative.

HDC however has addressed traffic impacts from the estates independently of each other that results in a major

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underestimation of capacity constraints and road safety hazards the three developments would have.

Decisions on building the Crawley Western Multi Modal Corridor rest with CBC and East Sussex CC and presently this new arterial road is not under active consideration.

On its own a middle section built by Homes England would serve no useful purpose in mitigating the negative impacts of increased traffic densities and represents therefore speculative misuse of public funds. It is likely Homes England has a covert motive for building the middle section, seeing it as a step towards its ambition to turn Wol into a 10,000 housing development.

HDC has a duty to undertake a full assessment of the cumulative impacts of traffic densities from the strategic developments in the vicinity of Rusper Parish on local rural roads. Planning consent for Wol should be conditional on expenditures to provide full mitigation for the negative impacts instead of giving consent for the misuse of public funds on a section of the Crawley Western Multi Modal Corridor.

Rusper's Made Neighbourhood Plan (RNP)  
The Wol development directly conflicts with many of the provisions of the RNP but those provisions have been ignored in the Wol planning process and planning application.

HDC has a duty to give attention to the negative impacts of the Wol proposal on the RNP and planning consent should be conditional on the provision of mitigating expenditures for those negative impacts.

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Kind regards

**Telephone:**

**Email:** [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)



**Horsham  
District  
Council**