

Examination of the Horsham District Local Plan 2023-2040

Hearings: week 2-3 - October 2026

Written statement from Save West of Ifield

Matter 6a: Strategic Policy HA2: Land West of Ifield

i. Transport and movement:

a. The delivery and funding of the link road, safeguarding and areas of search

The reason for the addition of Policies Map 54 is not explained. Is it linked to 350 more houses at Kilnwood Vale (KV1)? Or in preparation for the full 10,000 house proposal between Horsham and Crawley?

In their response to Crawley BC's draft Local Plan¹ **Homes England** made clear that the full Western Link Road (WLR) is critical to the 10,000 houses west of Crawley, but don't mention funding:

*5.2 ... the scoping of the Western Multi-Modal Transport Link is critical to unlocking further major strategic development to the West of Crawley beyond ... the Land West of Ifield site. As such, **while any future development to the West of Crawley (either in isolation or in-combination) above that currently tested may trigger the need for an extended multi-modal link at a future point in time, Policy ST4 provides sufficient safeguarding to enable its delivery ...***

WSCC's **West Sussex Transport Plan 2022 - 2036**² briefly mentions a WLR as a development-led medium-term priority, but with no reference to funding or safeguarded land. Paragraphs 6.24 and 7.72 are vague and feel like place-holders rather than a concrete element of a transport plan: "explore the role of a multi-modal WLR to support economic and housing growth...".

We were told anecdotally by a WSCC councillor that the WLR has been "on the table for 30-40 years but there is no WSCC money for it. It would possibly cost £120m. It seems clear that Manor Royal (Crawley) businesses won't pay for the northern section, and neither will Gatwick (GAL)."

Safeguarding and area of search – Northern section

Crawley BC commissioned the *Crawley Western Link Road – Northern Section Study*³ to explore the constraints and options for the section from Bonnetts Lane to Manor Royal.

The Crawley BC Local Plan Inspectors found⁴ that the combination of national policy and the Gatwick Airport Masterplan provided "robust evidence" sufficient to justify safeguarding the ASR (para.71) and that: "Bringing this all together, we find the over-arching approach to continue safeguarding land that would be critical for an expanded Gatwick Airport to be justified" (para.94).

We note that **Gatwick Airport Ltd** challenged⁵ the Study's methodology and findings.

The **Environment Agency's** response⁶ noted that part of the northern section lies in Flood Zones 3 and 2, and that "*the Homes England development [West of Ifield] includes a new road which will cross the floodplain of the River Mole. We are concerned about the possibility of cumulative impacts on flood risk to the area from both these projects, and it is essential that a joined-up approach is taken to manage the risk of flooding.*"

¹ <https://crawleybc-eire.s3.eu-west-1.amazonaws.com/Local%20Plan%20Representations/Written%20statements%20to%20inspectors%E2%80%99%20matters%2C%20issues%20and%20questions/6.%20Written%20Representations%20Stage%202/Matter%2010/REP-050-006%20Homes%20England%20Stage%202%20Matter%2010%20Hearing%20Statement%20%28West%20of%20Ifield%29.pdf>

² <https://www.westsussex.gov.uk/media/17428/wstp.pdf>

³ *Crawley Western Link Road – Northern Section Study*. Systra. (23/03/22) <https://crawley.gov.uk/sites/default/files/2023-05/Crawley%20Western%20Link%20Road%20Northern%20Section%20study%20refined%20area%20of%20search%20March%202023.pdf>

⁴ <https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-examination/inspectors-documents>

⁵ <https://crawley.gov.uk/sites/default/files/2023-05/Crawley%20Western%20Link%20Road%20Northern%20Section%20study%20Appendix%20I%20GALs%20Response%20to%20Systra%20Western%20Link%20consultation.pdf>

⁶ <https://crawley.gov.uk/sites/default/files/2023-05/Crawley%20Western%20Link%20Road%20Northern%20Section%20study%20Appendix%20I%20Crawley%20Western%20Link%20Road.pdf>

We are concerned that the options proposed in the Study would also destroy the southern part of the Willoughby Fields Local Nature Reserve.

Area of search – Southern section

We're not aware of a Study or any mention in the draft Plan of the constraints and options for the area of search for the southern section of the WLR between Ifield and Faygate.

The draft Plan's **Policy Map 54 needs correcting to identify the most important ecological features**, particularly House Copse SSSI and Kilnwood Copse Local Wildlife Site.

The significant ecological constraints include the SSSI, extensive ancient woodland and large numbers of Bechstein's and Barbastelle bats.

House Copse SSSI is a rare type of ancient woodland almost unknown elsewhere in Southern England. It sits at the centre of a rich and highly inter-connected network of ancient and priority woodland, shaws and hedgerows extending for miles around. Hence the whole area is recognised as a Biodiversity Opportunity Area (BOA). The woodland connected to House Copse is quite possibly as important as House Copse and equally integral to the Nature Recovery Network.

House Copse would fall at the centre of the 10,000 house development, with the LWR passing within metres. The woodland network would be completely destroyed resulting in severe habitat fragmentation and likely ecological isolation of House Copse. **This contravenes NPPF 180b and 180c.**

Informal surveys suggest large numbers of both **Bechstein's and Barbastelle bats** – individual and roosts – in this woodland network. The numbers are likely to be much higher even than recorded on and around the West of Ifield (Wol) site. Plus the highest number of recordings occur along the treelines to the west and north-west of the SSSI to Furze Field and Burnt Stubbs woodland, suggesting foraging activity that indicates the bats' **Core Sustenance Zones coincide exactly with the WLR area of search.**

Responding to the planning application the HDC ecologist suggested that the Wol site could be considered as a Special Area of Conservation (SAC) given the presence of Bechstein's bats. This argument appears to be even stronger for the proposed WLR and 10,000 house sites.

b. Active travel and the impact on the road system including Crawley

Please see our comments for Matter 5b.

ii. The delivery of facilities and their funding and phasing

The phasing of delivery of the secondary school at Wol poses an extreme safety risk. Homes England claim an "immediate" need for a new secondary school for Crawley, justifying delivery of the school ahead of the middle section of the CWMMC. Their Phase 1 construction traffic plan takes all construction traffic, for over a year, via the narrow residential roads in Ifield, past the gates of a primary school, and along Rusper Road which can't currently accommodate two buses passing, let alone construction traffic⁷.

The "immediate" need for a new school is based on WSCC's *Planning School Places* reports for 2024 and 2025. But WSCC's forecasts of future need have been continuously revised downwards, and the very large revisions in the 2026 report have completely changed the story. The current shortage of places is now forecast to be replaced by a significant surplus from 2033 onwards, which not only removes any immediate need but according to our calculations could easily accommodate the new pupils from the proposed Wol site. See Appendix A.

Plus, we confidently predict that WSCC's forecasts will be revised down even further so that **by the time the school is built the current deficit of places will have disappeared, so the argument for building 'immediately' or 'upfront' goes away.**

We've urged HDC and WSCC to require Homes England to **build the CWMMC first and use it for all construction traffic.**

⁷ See WSCC Highways response to the planning application, May 2026, paras 32, 33 and 122
https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=A52FF1DE20634760B493BB2F6F5D0DA8

iii. Impacts and mitigation:

a. Access to open space, including the closure of the golf course

MM195 weakens Policy HA2 2g from requiring mitigations to be “in accordance with” the Playing Pitch Strategy [etc.] to “having regard to” the Strategy [etc.]”.

Both Crawley BC and SWOI expressed concern that MM195 renders HA2 inconsistent with other strategic site policies where no change is proposed. The reason for the change is given as “flexibility”. So why is the same not required of other strategic sites?

This weakening of the requirement will reduce the potential provision, and this is already apparent in Homes England’s live application DC/25/1312:

- The proposed mitigation for the loss of Ifield Golf Course and Green Space is opposed by both Sport England and England Golf for its inadequacy to meet NPPF requirements.
- A key element of the mitigation is speculative in that delivery of the Local Leisure Centre is not guaranteed should no Operator be found^{8 9}.
- Homes England state ‘Open space, play & sports provision has been calculated against the *HDC Open Space, Sport & Recreation Review June 2021 Study*¹⁰. However, HDC’s response¹¹ identifies underestimation in population figures used by Homes England compared to HDC policy.¹²

We also note that the wording of MM 195 is directed principally towards **meeting the needs of the new community**. It does not expressly require the policy to demonstrate that the loss of existing recreational provision is adequately addressed.

We suggest HA2 be made more effective by adding a specific requirement concerning the loss of Ifield Golf Course such as:

“Development resulting in the loss of Ifield Golf Course shall not take place unless the Council is satisfied, having regard to the latest available sport and recreation evidence and policy, that the loss of the facility has been adequately assessed and that appropriate mitigation or replacement provision for existing and future users has been secured and is deliverable.”

b. Heritage assets

Heritage assets and their settings pose constraints to development of Wol, which was deemed *unfavourable* in respect to heritage¹³.

The site, Wol, is the setting to the ancient monument of the mediaeval moat at Ifield Court, the mediaeval Church of St Margaret, several listed buildings, and Ifield Village Conservation Area (IVCA). It is part of the story that links these assets historically. The urbanisation of this erstwhile parkland and agricultural land, with its ancient footpaths, will therefore cause harm to the setting of all these assets and diminish the ease of interpretation of their historical significance. The development will destroy a key piece of evidence.¹⁴

HDC¹⁵ identified the harm to Ifield Village Conservation Area (IVCA) itself as:

The proposed development will indirectly impact the conservation area by effectively squeezing it between suburban development. The opportunity to experience the conservation area as a historic village will not be

⁸ Table 6.8. https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=CEAE8D634D9942649A0F4C36A3A47DE1

⁹ Page 22. https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=CEAE8D634D9942649A0F4C36A3A47DD5

¹⁰ 4.3.24 https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=879C4A91957B47089B2ED24259761030

¹¹ Point 7. https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=4A56B65538CC4608B265FD0371374DCF

¹² Page 102 point 337. https://www.horsham.gov.uk/_data/assets/pdf_file/0020/104249/Open-Space-Rprt-Jun2021FINAL.pdf

¹³ 3.01 Strategic Sites Assessment p 83

https://www.horsham.gov.uk/_data/assets/pdf_file/0004/165433/HDC-Site-Assessment-Strategic-Sites.pdf

¹⁴ Historic England’s response to PA, DC/25/1312

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=2600E426CA0945F49E112201D65A0456

¹⁵ HDC Conservation response

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=5476C393077F4AD6B06B0BA813034D71

prevented but the experience will be different as the result of the perception of development including increased background noise, additional artificial light and glimpsed vehicular movement. This will result in harm in the middle of the scale.

It did not include, however, the additional harm to IVCA by rerouting traffic **through** the conservation area via Ifield Green¹⁶. The road is effectively a series of long chicanes, and totally unsuitable as a diversion¹⁷, a point not picked up by any statutory consultee. The impact of increased footfall through the meadows and the construction of a cycle route was also omitted.

The proposed bunds to shield the moat from the CWMMC, and 'interpretation boards, heritage trails and on-line resources'¹⁸ cannot mitigate for the loss of the present landscape.

c. Drainage and flood risk

The site is subject to both fluvial and pluvial flooding. The former from the four associated water courses leading to parts of the site being within flood zones 2 and 3¹⁹; the latter exacerbated by a relatively flat landscape with underlying geology of impervious weald clay.

The site failed the Sequential Test but was deemed to pass the Exception Test on the grounds that *the development would provide wider sustainability benefits to the community....* Mitigation for pluvial flooding would be delivered via sustainable drainage systems (SuDS)²⁰. However, the wider sustainability benefits quoted are over optimistic²¹ and optimal design features of SuDs may be compromised by constraints of space and viability^{22 23}.

The Environment Agency (EA) now advises that its concerns over management of fluvial flooding can be dealt with through a list of stringent conditions²⁴. This passes the responsibility to the LA to oversee their implementation over a long period.

The Lead Local Flood Authority (LLFA) is still raising questions over the design of surface water drainage, two of which would take more land to resolve (see footnotes 29 and 30 below). This would reduce the land available for housing.

The extensive infrastructure required and its long-term maintenance may render the scheme unviable. Certainly, Ramboll in their response to the LLFA's criticism of using pumps for lifting water from two retention basins into the nearest water course said: *"Relying solely on a gravity system would reduce available land for development, rendering the scheme unviable."*²⁵

d. Lack of sewage treatment capacity

The lack of **sewage treatment capacity** at Crawley wastewater treatment works (WwTW) and the associated risk of pollution of the River Mole are critical issues that are not being adequately mitigated for, and we suggest that policies SP23 and HA2 are not sound unless they are strengthened. Policy HA2 should be modified:

¹⁶ Transport Assessment (July 2025) WOI-HPA-DOC-TA-01 REV 1 paras: 4.39-4.41

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=B0B75CCA95AA4EAE927A3A68EDA6A7DE

¹⁷ Ifield Village Conservation Area Advisory Committee's (IVCAAC) response (Nov 2025) to planning application DC/25/1312 section F pp11-14.

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=09F5C8734D5F42E59444F166D629469B

¹⁸ RAMBOLL's 'West of Ifield – Post Planning Submission Comments'

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=7125F3C78E22455D9FEE8B704C6BD395

¹⁹ River Mole, Ifield Brook and Rusper Road Drain, Hyde Hill Brook

²⁰ https://www.horsham.gov.uk/_data/assets/pdf_file/0009/165438/Flood-Risk-Sequential-and-Exception-Test-June-2026.pdf

²¹ See Appendix 3 of reference in footnote 2 for the listed benefits. See also SWOI comments elsewhere in this document re challenges to school numbers, affordable housing and reliance on active travel.

²² https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=96CA15CFCFDE43188F8AE0ADAEAC4ECA Consultation Response from LLFA 25 Oct 2025, see page 2 for comment on unsuitability of using pumps to lift water from two attenuation ponds into the nearest water course.

²³ https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=4AAE87FCC85749BBB49623AD4E2181C9 Consultation response from LLFA 7 July 2026 re the need for larger attenuation volumes than in the masterplan, with two catchment areas (1 & 4) possibly not having enough space to accommodate them.

²⁴ https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=A7548718AD91461D8024ECF10639441D Environment Agency to HDC 20 May 2026

²⁵ https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=2FB6A1773F09419BBA092D0E731E3E97 Ramboll Technical Addendum section 4.2. The quote is at the top of p 7.

“10. Close liaison with water treatment utilities companies must be undertaken, including to provide, at outline planning application stage, clarity on the timing and funding of the new or expanded Wastewater Treatment Works (WwTW) is provided needed to provide timely additional capacity for the sewerage network. A clear agreement on the phasing of development must also be provided at outline planning application stage.”

This policy tightening is needed to counter Homes England’s position that the legal obligations on Thames Water to provide services are sufficient to guarantee that services will actually be provided in line with the Plan. Evidence should be required to show that Thames Water has a draft funding and delivery plan for any necessary upgrades. This is particularly important given Thames Water’s ongoing financial crisis²⁶ is dragging on, halting investment and making some form of nationalisation seem likely.

Crawley BC addresses the lack of WwTW capacity in its Local Plan²⁷: *“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.”*

We discuss the implications for the housing delivery trajectory under Matter 5b.

iv. Delivery:

a. Build out rates

We mention, under Matter 5b, the significant but unacknowledged risk to the Plan’s trajectory from Wol not delivering “at least 2,500 homes” by 2040, not least from the need to expand sewage capacity at Crawley WwTW before any houses can be occupied, which could take up to 10 years

b. Financial viability

The allocation of Wol is not sound without the publication of more detailed and reliable information about its **financial viability**. Please see our statement for Matter 5b for proposed modification to Policy 39 *Affordable Housing* and HA2.

We’re concerned that Wol is not financially viable given the degree of mitigation required. This presents a delivery risk, both overall and of cutting corners and renegeing on commitments, particularly given the heavy reliance on government funding – although the WPVA provides no detail on the scale or degree of commitment from HM Treasury.

Our key concern is that the **gross value from the scheme is being overstated** in the WPVA as 3,000 is an inflated assumption of the site’s capacity, **and that infrastructure and s106 costs are understated**.

In terms of **the site’s capacity**, in 2024 Homes England’s planning position was²⁸:

*... the masterplan includes a total of 2,748 homes, with a revised split of 36% flats and 64% houses. ...Given that Hillside primarily consists of larger houses, The reduction of houses in Hillside will complicate achieving the desired balance between flats and houses. ...Additionally, the larger units lost from Hillside will need to be redistributed within the masterplan to achieve the desired mix. **This adjustment will result in a loss of additional units beyond those already reduced in Hillside.** ...Overall, these changes in Hillside will affect the total number of homes, the housing mix and the market mix.”*

But a reduction to 2,748 and possibly lower is not acknowledged anywhere in the draft Plan, its evidence base, the WPVA or the current planning application. In fact the WPVA uses a figure of 3,000 throughout and suggests that this figure has been provided by Homes England²⁹. Aspinall Verdi recommend this is *“reviewed by the Council to ensure they are satisfied with the number of dwellings expected to be delivered over the plan period”*.

Has the Council done this review? Should the financial viability of Wol be reassessed based on a more realistic number of units?

²⁶ <https://www.ft.com/content/76616441-6419-4792-9d27-31c5fa436dc4?syn-25a6b1a6=1>

²⁷ Policy IN1, para 8.12 <https://crawley.gov.uk/sites/default/files/2024-11/Crawley%20borough%20Local%20Plan%202023%20to%202040.pdf>

²⁸ Page 2, *West of Ifield, Crawley, Response to Natural England, 12 September 2024 DRAFT* – from Homes England to Natural England and HDC during discussion of options for protecting Bechstein’s bat foraging grounds at the top of the golf course. Obtained via Fol.

²⁹ Para 8.5 – General assumptions for strategic site assessments.

The WPVA suggests there is a high degree of uncertainty around assumed infrastructure costs and s106 contributions, because hard information was not available for any site³⁰. Plus the size of the revisions casts doubt on both the 2023 and 2026 results.

So, can the Council's review and conclusions be made public, as part of the Examination and planning application processes?

What is the Council's view of:

- The WPVA's detailed assumptions about Wol's infrastructure, s106 and CIL costs?
- The doubling of the infrastructure estimate for Wol from £63m to £130m between the 2023 and 2026 assessments?
- The potential impact of an additional £22m costs as highlighted by Aspinall Verdi: *"...which indicates that viability reduces and the premium drops to below 10x EUV. **This reduction has the potential to impact the deliverability of the scheme ...**"*, and
- The assumed delivery timeline in para 8.158 which doesn't mention of the need for a phasing condition to allow additional capacity at Crawley WwTW to be delivered, which could take 10 years.

³⁰ Para 8.6 under General Assumptions (page 118)

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APPENDIX for Matter 6a: The West of Ifield (HA2)

Phasing of secondary school and CWMMC delivery at West of Ifield

Homes England cite an immediate need for a new secondary school for Crawley as justification for delivery of the school before the CWMMC can be used for construction traffic.

But our evidence-based analysis strongly suggests that **by the time the school is built the deficit will have disappeared, so the argument for building 'immediately' or 'upfront' goes away.** This has several consequences and we urge Horsham District Council (HDC) and WSCC to object to Homes England's extremely risky Phase 1 plan to route all the school construction traffic through Gossops Green and Ifield. Since there is no need to rush delivery of the school – it's not even needed for the new pupils from the West of Ifield – **the Crawley Western Multi-Modal Carriageway (CWMMC) can be built first and used for all construction traffic.**

Background

We submitted a 32 page detailed analysis to WSCC in April 2026 questioning the findings, and in particular the forecasts of pupil numbers, in their 2022/24 and 2025 Planning School Places reports. We have since reviewed the detail of the 2026 report, alongside related projections and data released by the ONS and DfE, and will be sending these findings to WSCC and HDC.

In summary, our conclusions are:

1. **We strongly object to Homes England's Phase 1 construction traffic plan on the grounds that it poses high risks to child and adult safety, and that there is no evidence to justify it.**
2. **Our review of WSCC's 2024 and 2025 Planning School Places reports found their conclusions about Crawley's availability of secondary school places weren't credible** and risk having misled decision-making on policy and expenditure questions around the need for a new secondary school and when.
3. **As we anticipated, the evidence for an immediate need for a new secondary school has disappeared due to very large revisions in the 2026 report.** Previous plan-making was based on the Yr7 deficits presented in WSCC's 2024 and 2025 reports, hence the conclusion of an immediate need for additional capacity. But these deficits were based on implausibly high forecasts of pupil numbers, which have now been substantially revised in the 2026 report. As a result the deficits are much reduced, and replaced by significant surpluses from 2032.
4. **The current shortfall (deficit) of secondary places in Crawley is temporary and very short-lived, and there will be sufficient capacity to accommodate the new pupils from the proposed West of Ifield site without the addition of a new Secondary school.** Our view is based on Crawley's falling birth rates and primary numbers, and looking at DfE's projections of Primary and Secondary pupil numbers.
5. **Although the forecasts now look more plausible we anticipate further downward revisions in 2027**, reflecting the continuing downward revisions to ONS population projections and DfE's pupil projections.
6. **Further downward revisions may also come from the removal of the peak in the Yr7 forecast (2030 to 2032).** Although the peak was reduced significantly in 2026, its cause is still not explained, and we suspect it may come from an incorrect forecasting treatment of the refugee arrivals in 2022/23.
7. **And capacity may be increased if the agreed and funded expansion at St Wilfrid's is included in the analysis.** No explanation is given for why it has not been.

And finally, a little more technical background:

- Our analysis of **WSCC's revised forecasts suggests they are still too high and should have been, and will be, revised down further** in light of the substantial revisions to the DfE's own projections in July 2026 and continuing downward revisions to ONS's projections of births and 0-15 population.
- We conclude that **WSCC's 2027 or 2028 reports could show Crawley with surplus secondary places from as early as 2028 onwards.**
- We accept that future flows of inward migration are difficult to forecast and we have also reviewed Home Office data on refugee flows.
- We also recognise that fertility rates and pupil numbers have tended to be cyclical and may be expected to start increasing again but, given the lag of 11 years between birth rates and secondary (Yr7) entry, the length of historical cycles (25+ years), and the fact that we're only now starting to see the downturn in secondary numbers, we wouldn't expect to see the cycle turn up until at least 2038, and then from a low base. **We anticipate a surplus of secondary places into the 2040s.**