

Rusper Parish Council

Response to DC/25/1312

Homes England West of Ifield Hybrid Planning Application

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.

Land West of Ifield Charlwood Road Ifield West Sussex

Summary

Rusper Parish Council strongly opposes this application.

It fails to meet critical sustainability requirements of national and local planning policy, especially in relation to transport and landscape. It proposes a new stretch of dual carriageway to service the site, but this only connects to narrow country lanes at either end and does not join to any A or B roads as expected under national planning policy guidance.

This hybrid planning application clearly fails the Spatial policy of both the current Horsham District Planning Framework [HDPF] and the proposed Horsham Local Plan. It fails all considerations of the current and proposed Spatial policies. It is not attached to any existing settlement within the Horsham District and is clearly seen as an extension to Crawley, but forms no part of Crawley's Local Plan and has been rejected by Crawley Borough Council as failing to meet any of their requirements.

It is an entirely green field development that removes an important sporting and recreation area that is Ifield Golf Course in addition to arable farm land that acts as a flood plain as well as contributing to local food production.

It fails national and local biodiversity requirements. The area proposed for development provides one of the most diverse range of wildlife habitats to be found anywhere in the country. Individual studies fail to recognise the diversity of habitats all interconnected by ancient hedgerows and water courses.

It is being put forward with no understanding of the consequences to local services. The current Thames Water waste water management for the area is at capacity with no plan for how it will be expanded to cope with this extra burden. The Southern Water water supply is also over capacity with critical environmental impact on the Arun Valley.

There has been no long term planning for what the impact of this development will be or how it will fit with other now agreed developments such as Gatwick expansion. There is no clear plan as to what form or route the proposed Crawley Western Relief Road will take or how or where it will join the existing major road network.

All in all this is a proposal just targeted at meeting a housing requirement imposed by central government and encouraged by Homes England to see a maximum return on land they own. It is not plan led as this site has been repeatedly rejected by local planners, until Homes England presented them with an easy option. The final selection process to include this site in the draft local plan was spurious. More suitable proposals are available elsewhere that do not face the same water supply and waste water issues, that connect directly to the major road network and that do not over intensify strategic development in one area of the district.

We wish all of our previous submissions in relation to the inclusion of this site into the currently suspended Horsham Local Plan to be taken into consideration. These are included as Appendices to this submission. Note that specific details of policies and key evidence documents are referenced in the detail below. This is Rusper Parish Council's [RPC] initial response, given the scale of documents presented and the inability to access the documents due to failings of Horsham District Council's [HDC] planning portal, other submissions are likely to be required.

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Planning Policy

Fails the National Planning Policy Framework [NPPF] :

- NPPF (para 175-177) states that, in relation to flood risk, if there are reasonably available alternative sites the development should not be permitted. Clearly, from HDC's own assessments, there are a number of alternative sites that do not incur this limitation.
- The absence of any connection to an A or B road fails the transport sustainability aspects of the NPPF (para 109 and 117).
- As a large scale development this should either have been planned as a new settlement, or a significant extension to an existing settlement (NPPF para 77). This proposal is neither, it isn't supported by Crawley as an extension to that settlement, nor does it incorporate all of the design features of a new settlement.
- Without mitigation, not currently included, the proposals fail NPPF (paras 208, 212, 213, 215 and 219) in relation to conserving and enhancing the historic environment.
- It is clear that adequate mitigation and compensation have not been provided for the severe loss of biodiversity that would occur should this development be permitted, contrary to the NPPF (para 193). It is clear that alternative sites with much lower environmental impacts exist within the sites put forward for the Horsham Local Plan.
- It fails NPPF, para 187 and 198 which deal with conserving and enhancing the natural local environment. It is clear from evidence below that the important natural environment will be lost along with its amenity value and key recreational facilities.

Fails Planning Policy Guidance

With regard to water neutrality, the West of Ifield proposal falls a long way short of good practice. The Planning Practice Guidance states that 'an appropriate assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project' (PPG para 003).

Fails the The Water Environment Regulations

There has been no proper evaluation of the impacts of ground water extraction, or alterations to existing water courses as required by Part 5 of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017¹.

Fails the Horsham District Planning Framework [HDPF]:

This application fails to meet key policies within the Horsham District Planning Framework [HDPF] (and the defunct Horsham Local Plan):

- Critically, the Spatial Policy – it is not part of, or attached to any existing development and has been rejected by CBC as an extension of Crawley. HDC seem to be treating this as a stand alone development, but this is not supported by their own spatial policies. The Planning Inspector raised this key point at the start of his examination of the proposed Horsham Local Plan.
- Traffic modelling indicates that the surrounding road network is already at or near capacity, and the development would be contrary to national planning guidance and local policies

¹See Water Environment Regulations.

(HDPF Policies 2, 39 and 40).

- It fails Policy 2 “To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment.”
- It fails Policy 25 “The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.”
- It fails Policy 26 “Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development.”
- It fails Policy 31 on supporting Green Infrastructure and Biodiversity.

Fails the Rusper Neighbourhood Plan [RNP]:

Rusper Neighbourhood Plan is a 'made' plan having been adopted by HDC on 23 June 2021, however there has been little or no engagement with RPC by either Homes England or HDC in relation to policies and important supporting documents within the RNP. There has been no discussion with the RPC of mitigation in relation to the many negative aspects of the proposal.

- This site was assessed as part of the RNP² and failed on a range of criteria.
- The landscape assessments³ established the value of this area for flood protection, farmland, natural habitats and recreational use. Development in this area would lead to the coalescence of Ifield West with Lambs Green and Rusper. This is an especially important consideration given the recent developments along the A264 at Kilnwood Vale.

Failure to provide adequate documentation:

A general point on the application documents, particularly the Environmental Statement.

It is proving impossible to navigate the documents due to:

- The sheer volume;
- The total lack of correspondence between the filenames on the HDC portal and the Appendices they contain. For example for chapter 8 there are files for Parts 1 – 12, with no indication of what each contains. For example, the document ENVIRONMENTAL STATEMENT CHAPTER 8 APPENDICES PART 12 has file name WOI-HPA-DOC-ESV1-01, REV 1, with no mapping or list provided to help the reader locate a particular Appendix when it’s referenced in the main Chapter 8 report; and
- Once in the Part 1 – 12 files, many do not even contain reference to which Appendices the material relates. So again, it is impossible to follow the references in the Chapter 8 report through to the actual Appendix to which it refers.

This renders the consultation process unfit for purpose as the timescale and volume of documents alongside the inability to identify the relevant files makes timely and informed response impossible.

Alongside this, there are a number of misleading statements, factual and quantitative errors that serve to undermine the integrity of the proposal. For example, the claimed Natural England endorsement and in the executive summary there is double counting of water savings from allotments and podiums.

²See RNP Evidence base, Site Assessments.

³See RNP Appendix H.

Key Impacts on Rusper Parish

Transport

This proposal, for what is a small town, lacks any connection to either an A or B road. All of the exists feed into narrow country lanes that are already stressed by rat running traffic.

Critically, the Charlwood Road / Ifield Avenue junction will become a major bottleneck. The other exit onto Rusper Road will channel traffic into the rural road network, creating significant highway safety and capacity issues for Rusper, Lambs Green, Faygate and Newdigate. This fragmented strategy fails to provide a coherent, resilient access solution for a development of strategic scale.

The Rusper Road exit will encourage back routes via Rusper and Faygate to the A264, or via Newdigate to the A24 at Beare Green. These patterns would spread significant levels of development traffic across small rural settlements and unsuitable roads, with cumulative impacts on highway safety, residential amenity and the character of the countryside. Development of the site would create unnecessary pressures on the highway network contrary to paragraphs 109 and 117 of the NPPF.

This development is effectively a new neighbourhood for Crawley. As such it will be the only neighbourhood that does not have a direct exit onto an A road. All of the proposed exits from this development will be onto narrow country lanes and necessitate driving out onto the country lanes, or through existing neighbourhoods to reach any main road. The key impacts of this will be: increased congestion and pollution; poorer road safety, especially along Rusper Road between Hyde Drive & Tangmere Road; and increased rat running through the narrow country lanes.

The Stantec model, used for the Horsham Transport Study, Local Plan 2039 Transport Assessment⁴ submitted as evidence for the proposed new Horsham Local Plan, concluded that a number of mitigations were required, but this report is fundamentally flawed. It assumed that the growth in housing numbers around the area during the plan period would be only 6,489 dwellings and even over the extended period taking into account all allocations this figure is only 8,249 and for West of Ifield this figure is only 2,500 at most. However, the Local Plan itself assumed 777 homes per year or 13,212 total and the governments standard method housing need for Horsham is 917 homes per year, totalling 15,487. This suggests that the increased impact is almost double that assumed in the transport study.

The same Stantec model was used by Homes England to undertake its modelling of the area in their Steer report and therefore suffers the same fundamental flaws.

HDC has failed in its duty to assess the cumulative impact on the road network of all of the proposed developments in the vicinity. Each proposal has been considered in isolation and modelled accordingly, with no understanding of what the true impact of each will be. The absence of any data for the impact of other major developments, all focused around Rusper, mean that any modelling is speculative at best. Without substantial upgrades to the road network and a more comprehensive transport strategy, the development risks undermining both local mobility and environmental quality.

The Transport Policy Statement (Point 2.35), has an aspiration for 50% of all journeys to be walked or cycled. This is highly questionable. How realistic is this goal, especially during winter months or for families with children? Government guidance states “*A proportionate Monitoring & Evaluation plan should be developed for all active travel interventions*”⁵, but there is no indication that this will happen.

⁴Horsham Transport Study

⁵Active Travel Fund monitoring and evaluation

All of the active travel references in the application treat the proposal as an extension of Crawley, but the entire development has very poor connections to Crawley and is entirely within the countryside of the low weald, with its winding roads and small villages such as Rusper. A development of this size therefore has implications for two very different environments. Given that the only access to the development is via C roads, that is residential roads or country lanes, the proposals case that all of these issues can be mitigated by the new residents walking, cycling, and using buses, rather than using cars (a modal shift) is misjudged. The assumption of a high take-up rate of active travel is key to the viability of the application and much of how this will be facilitated on site is called into question. Even if active travel were achieved within the site, its continuation beyond the site is much more difficult and unlikely.

In relation to the evidence for a modal shift and its impact on active travel and the overarching traffic modelling, the Highways Agency's response to the application states that "It is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability, and operational efficiency of the SRN" due to insufficient evidence for the assumptions underlying the traffic modelling. The Highways Agency demands justification/evidence for the "very ambitious modal split 'vision'" (active travel), and bus usage assumptions. More information is also demanded on trip generation and distribution, how information from GAL has been incorporated, explanation of how the legacy and interim parking ratios have influenced the modal split assumptions later used in the trip generation and highway modelling, and explanation of how assessment affected if other sections of CWMMC are not delivered as modelled.

HDC's own Sustainability Appraisal for the draft Local Plan stated for WOI that:

"Commuting patterns for the area based on 2011 census data indicate that, despite the railway station, few people commute to work using the train. The majority of people in the area commute via private car and new development at this location has the potential to result in new residents adopting similar travel habits." [At Reg 18 and 19 2021 App D]

And "Furthermore, the delivery of the middle section of a new relief road will not address existing private vehicle congestion, and is proposed to be used for public transport access. Possible eventual delivery of the Crawley Western Relief Road may help to alleviate congestion in the area but is likely to reduce the potential for the achievement of modal shift."

It is clear that for a significant modal shift to match the assumptions several factors would need to be in place:

1. Cycle routes which are safe and lead to popular destinations outside the site. Whereas in reality the on-site planned cycle routes will join busy narrow roads with limited or no pavements and without their own safe cycle lanes. Additionally, the increase in traffic encouraging rat-running through neighbourhoods and surrounding areas, would discourage walking and cycling for safety reasons.
2. Safe pedestrian routes. In reality, counterflows of pedestrian traffic on narrow pavements, especially at school start and end times, when parents with young children and pushchairs will be vying for space with older students and the general public.
3. The availability of good rail and bus connections which can be accessed within a reasonable walking distance. In reality, any additional bus routes will use roads which are too narrow and where there is limited space for improvement. Ifield station has a short platform with limited space for improvement, zero parking and low performance related to cancellations, (actually the lowest in the country⁶).

⁶Ifield railway station in Crawley has the highest percentage of cancellations in the country, according to new figures seen by the BBC - Sept. 2025.

“Delivering a mixed-use development so that people can go about their day to day routines, without having to leave the site” would obviously reduce car journeys. If all of this infrastructure is not available from the initial build, it is not an effective solution. Even with all of this we must still expect an extra 3,600 cars exiting this site onto country lanes at Rusper Road and Charlwood Road.

Including “a multi modal corridor with high quality bus infrastructure, including bus lanes, and well designed, segregated pedestrian and cycle facilities between local centres to allow people to move safely and conveniently around the development, without having to use a car”, is a laudable aspiration. However, the multi model corridor exits onto rural roads, not A or B roads, with no pavements or cycle ways meaning that the design is fatally flawed. Moving around the development without a car is not guaranteed and discriminates against the elderly and disabled.

Future proposals to connect this multi modal corridor to the major road network to create a full western relief road for Crawley remain an aspirational target with no clear plan or any safeguarding for a proposed route for this to occur.

Given the high cost of use and absence of proposed bus routes, and the lack of any funding model for the bus services this proposal carries no weight.

The proposals state: “A car parking strategy which acknowledges current and future demand, which is expected to decline, given peoples attitude to travel, especially within the younger age groups”. No data is provided to support this statement. In fact the governments latest study for the Department of Transport, the “Car Ownership: Evidence Review”⁷, predicts the opposite. This study found a 50% increase in cars per household over the previous 50 years and despite a small decrease in 2021 and 2022, attributed to Covid, the upward trend now continues. Notably, according to the report, “in 2023 car sales appear to be on the rise again, with evidence showing that new car registrations in the UK increased by 17.9% in 2023 compared to 2022 and the used car market grew by 5.1% over this period”.

In addition to all of the transport issues above, the development lacks any thought to horse riders or carriage drivers.

In a recent survey over 30 equestrians reported having near misses with cars or vans and a couple of horses have been injured. One rider reported that she had an incident with a car almost every time she goes out for a ride. As highlighted, the existing roads are very dangerous for horse riders, even before this development adds to the problem.

There are over 350 horses in the area some of these are at livery yards whose businesses will be adversely affected by this development.

Should this development go ahead we would strongly ask that equestrians be given proper consideration. This should at least include footpath upgrades to FP150 and 1517 and within the development, the cycle routes that are proposed should be upgraded for equestrians use.

Landscape

From the emerging HDC local plan, strategic policy HA2 states that any development in this location must respect the rural and natural environment and local heritage and be brought forward in a sensitive way which generates net biodiversity gain, effectively mitigates any adverse impacts on protected species (such as bats) and delivers green infrastructure that is functionally linked to the surrounding environment. Development will also need to ensure access to the wider countryside for existing residents of Crawley is retained. This is reinforced by the revised NPPF, para 187 and 198

⁷Car Ownership: Evidence Review

which deal with conserving and enhancing the natural local environment.

Construction of the Proposed Development would change the existing landscape baseline by replacing rural farmland and a golf course with new built infrastructure comprising residential, commercial, retail, education and community use, as well as new road infrastructure.

The HE Main Environmental Statement states that over time, and with the maturing of the landscape proposals, the level of adverse effect would reduce slightly. The landscape along the River Mole would benefit from the maturing of the new green infrastructure associated with the Proposed Development for Phase 1 also that the wider character area beyond the Site would not experience significant effects due to the high level of visual containment of the Site from existing boundary trees and hedgerows. How can this be true?

There is insufficient evidence to show that the aspirations of a “garden town” and “landscape led” can be met. The vision is to create a series of landscape character areas based on the unique characteristics of each part of the site; open space within the development is categorised into a series of landscape typologies.

Many of the assessments detailed in the Landscape and Visual Impact report show “adverse effects” from construction to completion no additional mitigation required.

A number of key features of the area have been ignored, or dismissed, notably:

- This area's value isn't just buildings; it's the rural setting and approaches to Ifield village and church. Buffers and thin landscaping strips are not enough. The proposal urbanises this rural setting.
- Landscape and Visual Impact assessment has not addressed the ecological significance of the site in any meaningful way.
- Natural England suggest that the development may impact on the High Weald Area of Outstanding Natural Beauty but the Environmental Statement dismissed this statement by adding that “due to the intervening suburbs of Crawley there would be no intervisibility with the site”
- Environmental Statement and Design Code documentation admit that there will be significant adverse visual impacts for residents.
- Urbanising elements such as marker buildings, engineered SuDS basins, and hard urban edges are wholly at odds with the rural character of site.
- Public rights of way and views across Ifield Brook Meadows will be irreversibly changed.
- There will be loss and degradation of valued open spaces, including the role currently played by Ifield Golf

The HDPF provides key policies for protecting and enhancing the natural environment, which have not been properly addressed:

- Policy 2 “To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment.”
- Policy 25 “The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.”
- Policy 26 “Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development.”
- Policy 31 supporting Green Infrastructure and Biodiversity

The Landscape and Visual Impact report highlights many “adverse effects” of the development on the landscape.

Heritage

The medieval moated site at Ifield Court and the rural surroundings in which it would have been constructed and used will be seriously impacted by this development. Similarly, the Parish Church of St. Margaret which is a very fine example of a medieval parish church with a prominent 15th century tower will lose its current, largely open, setting consists of meadows and countryside to the west, which contributes to its historic value⁸.

This site represents a fine example of ancient hedgerows and field structures that provide an opportunity to understand the rural connection with Ifield village as the rural edge of development in this area, with the church standing alone at its western edge.

Water Supply and Flood Risk

This site clearly fails all aspects of water supply, waste water management and flood risk. Whilst water supply is from the Arun Valley and will seriously impact the RAMSAR, all waste water will flow out into the Mole which already suffers significant flooding.

Water supply

It must be emphasised that this development will receive water via the Southern Water network that relies on extracting water from the Arun Valley which is contributing to the declared Environmental Emergency for that region.

The Water Neutrality Statement (WOI-HPA-DOC-WNS-01 July 25) provided by Homes England is deeply flawed.

Its target of 85 litres per head of water usage is significantly below the governments predicted target of 110 litres per head of the population by 2050⁹. There is no justification given for this significantly reduced figure.

Similarly for commercial water usage, the assumption of 3 BREEAM credits would give a 40% reduction on the baseline figures, but again the governments predicted targets in the latest Environmental Improvement Plan [EIP] would only assume a calculation based on 15%. No evidence is provided for the assumed baseline figures or on who will be responsible for monitoring the outcomes. Obviously, this will be dependent on the type of commercial use that eventually takes occupation, but no consideration is given to that, so assuming better than the governments targets is not substantiated.

The assessment of bore hole provision is woefully lacking. There are two key issues: firstly there has been no hydrogeological study of the impact of removing this underground water on the below ground ecosystem, or the potential effect on structural integrity for the land above; secondly, there has been no long term study of the refill rate, especially during the critical times of drought. Additionally, the figures for groundwater extraction and rain water harvesting [RWH] seem to be a combined total in the calculations with no detail of how much is provided by each.

Use of SNOWS offsetting to achieve over 300,000 litres per day seem premature, when there is no evidence that that volume will be achievable, especially after already stalled approved developments

⁸Historic England submission.

⁹Reference the UK Government EIP and recent press statement from secretary of state.

has been given their allocations to allow properly considered developments to progress.

Waste water

Waste water will be managed by Thames Water, who in their submission make it clear that there is not sufficient capacity to support this development. In the absence of any clear and agreed plans to resolve this situation the development should not be permitted.

Thames Water also point out that the existing sewers that run across the proposed development have not been taken into consideration.

We urge HDC to additionally consider:

- a) the technical advice documents¹⁰ about water cycle that were prepared for Crawley and Horsham jointly and which showed that Crawley and Horley sewage works are at capacity;
- b) the monitoring of the River Mole (the receiving river) by the Citizen Science Group (River Mole River Watch Group¹¹), which shows the current poor quality of much of the river, and
- c) information about the financial and infrastructure problems of Thames Water from the press and from parliamentary discussion.

In respect of sewage and wastewater disposal the application is almost entirely concerned with plans of existing utilities infrastructure (pipes) and changes needed to these. There is no mention however of the capacity constraints at Crawley or other WWTW. This failure to acknowledge a known and significant issue forms a strong basis for objection:

1. **Failure to address a known constraint in the Environmental Statement** - The omission of sewage treatment capacity is an issue, particularly given the long-standing concerns with Thames Water and the clear environmental risk. This could be a breach of the EIA Regulations.
2. **Failure to provide mitigation** - Where a significant risk is known, the ES and application should propose mitigation measures.
3. **Potential misrepresentation in the Environmental Statement (Chapter 14)** - If the ES claims that Thames Water confirmed capacity exists when, in fact, their position was only that capacity needs to be assessed, that does look misleading. It may also have legal implications if it is found that the applicant has materially misrepresented consultation responses.

In relation to point 3 above: In the ES Chapter 14 Table 14.1 it is stated that in the “HDC: Letter dated 15th July 2024 - HDC have relayed comments from Thames Water and Southern Water, summarised below: Thames Water: • **Foul water requirements both on and off-site can be met**, including treatment and network infrastructure.” **But this is untrue.** The comments that HDC actually relayed in their response to the 2024 EIA Scoping Request were: “Thames Water consider the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met”. Thames Water were asking that the EIA / ES considers whether the demand can be met. They were not stating that it can be met. This appears to be a misrepresentation of the facts in the ES material.

It seems clear from the application that the necessary discussions with Thames Water have NOT taken place. The Utility Strategy Report says (4): “Based on these demand estimates, further consultation

¹⁰https://crawley.gov.uk/sites/default/files/2021-01/Gatwick_sub_region_water_cycle_study_August_2020.pdf

¹¹<https://www.rivermoleriverwatch.org.uk/post/river-mole-september-water-quality-status-poor>

will need to be undertaken with the incumbent local providers to confirm phasing and capacity within their local networks to meet the increased demand. It is understood that the separate Utilities Statement being prepared by Ramboll may describe additional, more detailed consultations that they are believed to have undertaken with incumbent local providers, but to date we have seen very limited information regarding any such liaison.”

But the Ramboll Utilities Statement does not add anything (4.4): ”The proposed discharge rate will need to be agreed with Thames Water via a pre-development enquiry application. Initial discussions with Thames Water suggest that there would be no issues with the proposed rates and connections to their sewer. ... Further liaison with Thames Water is required to agree the final arrangement.” In fact this completely contradicts Thames Water's submission.

Flood Risk

This development is in a flood risk area and will impact on high risk areas along the river Mole. The NPPF (para 175-177) suggests that if there are reasonably available alternative sites the development should not be permitted. Clearly, from HDC's own assessments, there are a number of alternative sites that do not incur this limitation.

The Environment Agency response highlights a number of concerns in relation to surface water management.

The National Standards for SuDS were updated in July and are very likely to mean alterations to both the full and outline parts of the application. WSCC the Lead Local Flood Authority has objected and requires additional information regarding the Technical note to cover how each National SuDS Standard is met/will be met .

Environment

The purpose of the Environmental Statement: Non-Technical Summary is unclear [ENVIRONMENTAL STATEMENT NON-TECHNICAL SUMMARY: WOI-HPA-DOC-ESNTS-01, REV 1].

We are very concerned that it presents a narrative which is far from an accurate summary of the findings of the chapters of the Environmental Statement. It has a clear bias towards the positive and reads like a public relations pitch for the development, rather than a scientific analysis of its environmental impact.

Horsham Council officers and councillors would be advised to avoid reading it, and to concentrate instead on the Environmental Statement itself.

Examples of the bias and lack of accuracy in the Non-technical Summary include:

- Under Biodiversity
 - Under-playing of the biodiversity baseline, via no mention of the designated Local Wildlife Sites surrounding, and within 2km of, the development;
 - Plus no mention of the high numbers of important, notable and protected species recorded in the surveys or in the SxBRC, as listed under S41, UK Bap priority, Sussex Rare or WCA protected species
 - Under-playing of the effects of the development, in particular no mention of the effect on Ifield Brook Meadows; and
 - A narrative that the overall effect will be beneficial. All the mitigations will be effective, and enhanced habitats will outweigh the adverse effects on species populations.

Gatwick

Gatwick Airport predict that the new second runway could raise the airport's capacity from 281,000 flights in 2017–18 to 375,000–390,000 by 2032–33. The subsequent noise impact on houses within this development area would be a serious health risk that has not been properly assessed or mitigated.

Loss of farm land

The value of this land in terms of food production has been underestimated. It has been productive farmland for hundreds of years and supports a mixture of arable and livestock farming that provides a valuable local source of food. No thought or proposal is given for the mitigation of this loss.

Biodiversity

Ecological impacts:

The loss of biodiversity across this site will be immense. The site comprises what is probably the widest range of habitats across a single site, all connected by ancient hedgerows and water courses, anywhere in the UK.

The habitat and ecosystems varies from west to east to encompass: open parkland with new forest plantations at Ifield Golf Course, through arable farmland which has supported a wide range of crops over hundreds of years, to grazed pastures and on to marshy areas and ancient woodland at the eastern end of the site. All of this is interconnected via ancient hedgerows and water course. Those water courses further connect this rich and diverse habitat area to the wetland environment of Ifield Mill Pond and Bewbush Water Garden.

The national significance of this diverse range of habitats has been lost in the Environmental Statement, which fails to recognise that such a diversity is very rare.

This diverse and interconnected range of habitats supports a number of rare and endangered species, including: bechstein bats, longhorn beetles and crayfish, as well as a number of red listed birds.

Evaluation of the ecological impact on existing habitats, and the number of rare species has not been properly undertaken. There is no mention of rare species such as Wild service tree, Midland hawthorn and Violet helleborine. There has been no study of mosses, lichens and fungi across the site, or any proper evaluation of the environmental impact on waterways.

There needs to be an independent assessment of all of these key environmental impacts.

These findings are backed up by the Environment Agency response and the Sussex Wildlife Trusts objections. These responses confirm the RPC view that adequate mitigation and compensation have not been provided for the severe loss of biodiversity that would occur should this development be permitted.

Evidence in the emerging HDC Local Plan for this area (HA2) indicate that "Proposals must provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Net Gain Plan, to demonstrate how a minimum 12% net biodiversity gain will be achieved on the site". It is clear from the submitted assessments that not even the government's minimum of 10% BNG can be achieved and the likely best scenario would be less than 8%, which fails to take into account the key features of the diverse habitats listed above that already exist and will be lost.

Infrastructure

There are major shortcomings in key infrastructure provision.

In terms of schools the proposals fail to meet the required number of Primary school places for the number of houses proposed.

There is an absence of information on how Primary medical care provision will be met. This is something that HDC has responsibility for and has failed to indicate how this would be met. The nearest Hospital, East Surrey at Redhill, is already under increasing pressure, much of which is exacerbated by already increasing patient numbers. The East Surrey Hospital has had its rating lowered from "outstanding" to "requires improvement" by the NHS watchdog after its latest inspection.¹²

We have been unable to assess this application in relation to other key infrastructure requirements such as power provision, fire safety and policing, because of the failure of the HDC planning portal to provide access to the material. This is also true for aspects such as employment provision and assessment of need.

Section 106 Contributions

As this application progresses and the need for funding for community facilities or local infrastructure improvements becomes clearer, RPC as the Parish Council that will be responsible for this, would expect to be involved in all negotiations.

This would be especially important in relation to the proposed River Valley Country Park and the sports and play areas and community centres.

It needs to be appreciated that under current political boundaries, this will mean a significant growth to the management responsibilities of Rusper Parish Council and as such will require significant work by the parish council to plan this properly.

¹²'Outstanding' hospital now 'requires improvement' – BBC Aug 2025

Appendix 1a to 1c

RPC response to latest HDC Local Plan.

Appendix 1a Initial RPC response in 2020

Appendix 1b RPC Reg 19 response 2023

Appendix 1c Biodiversity Myth

Appendix 2

HA2 Independent Landscape Report 2024-02-20 by Neil Williamson Associates for RPC

Appendix 3

RPC NP Appendix H_Landscape Character Assessment and Assessment Of Local Gaps In Plan Area.
Specifically reference Spatial Plan Area 2

Appendix 4

RPC NP Site Assessment

Appendix 5

Rusper Parish Council - Highways and Transport Technical Advice by Alan Bailes Consultancy for
RPC