



West of Ifield

Homes England response to Rusper Parish Council – Questions proposed at meeting on 18th September 2025

1. **The scheme proposes 10,000 homes, yet only the first 3,000 are being addressed. Why is planning not accounting for the full scale of development from the start?**

This planning application is for 3,000 homes in a new sustainable development supported by the much-needed infrastructure including school places and transport improvements. It is not a planning application for 10,000 homes. This is in line with the draft allocation in the emerging Horsham Local Plan.

Any wider development would need to be considered as part of any future plan making exercise led by the relevant planning authority, taking into account housing and economic development needs.

2. **Schools are required for 9,000 homes, so why is provision only being considered for the first 3,000 homes? Can you guarantee a school will be delivered within 5 years?**

Please refer to the submitted Infrastructure Delivery Plan (page 44) which sets out the education need generated by the proposed development. The planning application is for 3,000 homes and it proposes education provision to reflect this.

For primary education, this includes a 3FE school which is sufficient to meet the anticipated pupil yield of 552 children, equivalent to 2.62 forms of entry. **Please see 5.2 of the Infrastructure Delivery Plan** for further information.

For secondary education, Homes England are working closely with the Department of Education to provide land for an expanded site that can also meet existing unmet education needs as required by the draft Local Plan policy. Work is underway to ensure that the Secondary School will be provided at the outset of the development, to meet the immediate existing need identified by West Sussex County Council (WSSCC) as well as meeting future needs arising from the scheme itself. Heads of Terms have been agreed between Homes England the Department of Education to provide the land needed for the proposed Secondary School, and the phasing plans show this committed within the early phase of the scheme.





- 3. With a target of 35% affordable homes, how will affordability be balanced with “high quality design,” given the risk of profit margins being too slim for developers? What guarantees exist that affordable housing targets will actually be met?**

Affordable housing requirements will be secured through a legally binding s106 agreement. The requirements for this are **set out in the accompanying Section 106 draft Heads of Terms and page 43 of the Infrastructure Delivery Plan.**

As a Government Agency, meeting housing needs is a key objective. To ensure our sites deliver against requirements set out at the Outline Planning Application stage, Homes England contracts with developer partners e.g. housebuilders through a legally binding Building Lease agreement. This means our developer partners are contractually obliged to build what is agreed at the outset in our contract with them and they are held to account throughout, and we maintain control of the number and type of affordable homes which are proposed.

- 4. The road assessment mentions 10m for Rusper Road, but it is actually only 5m wide. How was this miscalculation made? Reference to Road Safety Audit – public suggested this was carried out during October half term and should be redone.**

Homes England wish to query this above comment. Having re-reviewed the planning application submission, the only reference to 10m in width is within the *Phase 1 CTMP*:

“Tangmere Drive Tangmere Drive is a two-way residential road with a 30mph speed limit. The footway to the east is 2.4m wide with a grass verge separating this footway from the carriageway which is approximately 10m wide. The footway to the west is approximately 2.1m wide with grass verges of around 3.2m separating the footway and the carriageway. There is on-street parking on both sides of the road.”

There is no reference to Rusper Road being 10m.

The Stage 1 Road Safety Audit was conducted at the completion of the design phase, focusing on identifying potential safety issues before planning consent is granted. A site visit was made for the audit team to see the general site conditions to better understand the proposed design and how the scheme ties into the existing highway. The timing relative to school holidays etc. was not a key factor in the audit as reference would have been made to previous traffic flow surveys in both the design and the audit.





5. Hyde Drive (1,005 homes) has not been mentioned in the transport calculations—why not?

Please see section 9 of the Transport Assessment. The strategic modelling has been used to demonstrate where traffic flows might impact local junctions within the vicinity of the development. They have been selected where they are in close proximity to the Site and agreed through pre-app discussions with West Sussex County Council, the local highway authority.

Existing traffic – including that from existing residential areas, forms part of the model baseline. The Crawley Transport Model that has been used to assess this application has been developed and is owned by WSCC as highway authority, with baseline position updated through the undertaking of on the ground survey work. This ensures that consideration of background traffic (including from Hyde Drive) is accounted for within the assessed impacts.

6. How will sewage be managed, given that the local system is already struggling and no mitigation measures are included?

Homes England has engaged with Thames Water – There have been a number of pre-planning enquiries, led by Arcadis who have prepared the “full” element of the planning application. This engagement has then been shared with Ramboll, who have prepared a number of documents for the “outline” element. This is a common approach for an application of this nature. These proposals have been discussed with Thames Water, who are agreed in principle to the strategy, and that additional flows can be met through planned upgrades to the foul water network. Where upgrades are needed in the vicinity of the site, sufficient safeguarding of land has been allowed for within the parameters to ensure these can be delivered.

Please refer to Section 4.4 of the Utilities Statement. The foul water drainage strategy proposes most of the site achieving connections via gravity to the existing sewer network. For part of the site, towards the west, a pumping station is proposed to convey the drainage to a location for connection to the sewer via gravity. The planning application proposes upgrades to the foul sewer system to support the development and are **shown on Proposed Foul Layout Drawings (Sheets 1-5), Ref. 10051123-ARC-050-1A-DR-DE-00031-00035-P01**, and a plan showing the indicative drainage layout and discharge points in provided within **Appendix 6 of the Utilities Statement.**

Thames Water has also been consulted as part of the planning application. This is why the Utilities Statement makes reference to further engagement with Thames Water. They have now commented on the planning application, requesting two pre-occupation conditions to secure upgrades to the foul network.





Homes England expect that occupation of each home will be subject to adequate capacity being provided. This will be funded by Thames Water and investment recouped under future service provision, which is a standard approach for new development.

In respect of Crawley sewage treatment works – Thames Water prepares a number of documents, like a Local Plan, to manage and growth their facilities. The current Asset Management Plan and Catchment Strategic Plan for this area sets out upgrading the treatment works in 2030. This aligns with the programme for new homes being occupied at West of Ifield.

7. How can transport plans be realistic when 23,000 lorry movements are included, but worker car traffic is excluded?

For the demolition and construction transport assessment, an additional construction vehicle trip generation assessment has been calculated for site operatives (worker car traffic) arriving/departing at the Site. These workers are expected to use a standard car/3.5T van (Light Goods Vehicle, LGV). Information on the calculations for residential and non-residential site operative vehicle trip generation is included in **Chapter 13 of the Transport Assessment (see Table 13.3 and 13.4).**

8. Ifield Station is only being maintained, not developed—so how can it handle the additional demand?

The assessment of multi-modal trips generated by the development on the public transport infrastructure is included in **Chapter 11 of the Transport Assessment.** It is stated that Ifield Rail Station currently has a regular service at all times of day. During the morning peak, two trains per hour are provided towards London, Crawley, Three Bridges and Gatwick Airport, with five trains per hour towards Horsham. During the evening peak, five trains run from London to Ifield and two trains per hour run from Horsham to Ifield. During off-peak periods, two trains per hour typically serve Ifield in each direction.

The multi-modal trip generation assessment, which sets out the trips generated by the development in the morning 08:00-09:00 and evening 17:00-18:00 peak hours, includes the number of trips expected to use the nearby rail services. The assessment outlines that a total of 139 additional external passengers in the morning peak hour and 184 external passengers in the evening peak hour are expected to travel by rail. The assessment concludes that the existing frequency of rail services at Ifield Station will be able to accommodate the additional passengers in both morning and evening peak hour periods. The rail operators have not raised any issue in respect to increased demand.

The bus strategy has been developed in discussion with Metrobus, the main bus operator within the Crawley area and the most likely provider of new bus services to the Site, and input from WSCC, HDC and





CBC. The strategy comprises two “Fastway” services which will serve the Site and provide connections to the wider area. Bus patronage in Crawley increased by 160% between 2003 and 2013. This increase was attributed to Metrobus and the introduction of Fastway services to the area. The proposed bus routes and stops are set out in **Figure 6.1 of the Transport Assessment**. Route A proposes a connection to Ifield Station, Crawley town centre and Three Bridge station. Proposed Route B seeks to provide a direct connection from West of Ifield to the Manor Royal employment area and Gatwick Airport, which are key employment centres.

An off-site mitigation package is also being developed for Ifield Station which will be secured as part of the S106 agreement. This currently includes:

- Reconfiguration of station land, predominantly on the north side of the station, to provide a Mobility hub including additional cycle parking. This may form a multi-use structure with smart technologies, including a customer information screen, wayfinding, an Amazon locker, coffee cart, and advertising boards. An open frontage can be provided for ease of use and improved pedestrian surveillance for cycle security.
- Additional waiting shelters on platform.
- Decluttering around the station and its entrance to increased public realm and circulation space.
- Potential introduction of a 20-minute car parking bay.

The proposals are also supported by the creation of new and improved pedestrian and cycle infrastructure on key routes to the station. These will improve accessibility and limit the potential increase in vehicular traffic accessing the station.

9. Why are new petrol stations and four new schools excluded from the transport impact assessment, including construction traffic?

As with the question on Hyde Drive, **please refer to section 9 of the Transport Assessment**. The strategic modelling has been used to demonstrate where traffic flows might impact local junctions within the vicinity of the development. They have been selected where they are in close proximity to the Site and agreed through pre-app discussions with West Sussex County Council, the local highway authority.

Existing traffic – including that from existing residential areas, forms part of the model baseline. The Crawley Transport Model that has been used to assess this application has been developed and is owned by WSCC as highway authority, with baseline position updated through the undertaking of on the ground survey work. This ensures that consideration of background traffic is accounted for within the assessed impacts.

A petrol station will likely be attributed to “pass-by” trips with vehicles already on the local highway network, rather than generating new trips. Therefore, it is not required to include this new petrol station in the strategic traffic modelling.





10. What specific traffic calming measures are proposed for Rusper village, and why are they considered necessary?

The Infrastructure Delivery Plan sets out a summary of the proposed Transport Strategy. Development proposals at Land West of Ifield fully mitigate their impact on the transport and highway network. **Table 6.1 of this document** sets out the highway and route works proposed as commitments and obligation to achieve this, with details regarding the approach to delivery set.

In terms of Rusper Village, the Decide and Provide Monitoring and Mitigation Plan, with HDC and WSCC, will determine if traffic calming will be required. This would be a financial contribution to reduce impact of traffic associated with the development on surrounding villages by delivering traffic calming measures to help reduce attractiveness of country lanes as a route to access the Crawley Western Multi Modal Corridor. This could include up to 5 priority chicanes within Rusper / Lambs Green / Ifield Wood or alternative measures as agreed. The detail of any traffic calming will be determined though consultation with the local highway authority and the Parish Council at the point it is required to ensure it is effective and addresses any residual impacts.

11. With 15 km of new footways and cycleways, where are the bridleways and safe horse-riding routes? How will rider safety be addressed in an equine community?

One existing Bridleway route is located nearby the site to the south of Rusper Road and connects to Rusper Road via Arthur Road. The route terminates at Rusper Road, with no further onwards connection. The stopping up of Rusper Road (which forms part of the development proposals), will reduce the amount of traffic on Rusper Road and make this area safer for horse-riding.

No additional bridleways are proposed as part of the development. However, **the Section 106 draft Heads of Terms** does include a commitment to make a financial contribution to strategic Public Right of Way (PRoW) improvements which could include improvements to Bridleways and other enhancements that would benefit all users.

The stopping up of Rusper Road (which forms part of the development proposals), will reduce the amount of traffic on Rusper Road and make this area safer for horse-riding. The remainder of the internal network is largely in Outline at the moment and subject to reserve matters applications, whereby any equestrian access necessary, will be accommodated.





12. Why is there no mention of Gatwick Airport, despite its proximity to the site and potential traffic/air quality impacts? Gatwick is mentioned as an employment opportunity so therefore it should be included in the traffic impact.

The Transport Chapter within the Environmental Statement and the Transport Assessment both include for the planned growth at Gatwick Airport in line with the recently approved Development Consent Order (DCO). The traffic modelling therefore provides a cumulative impact assessment including Gatwick Airport growth, providing a robust worst-case assessment on the local highway network. **Please reference the TA (Chapter 9, Paragraphs 9.27-9.32) and the Transport ES Chapter (Paragraphs 15.4.15-15.4.21).**

The Air Quality Chapter within the Environmental Statement includes assessment of the Site in combination with the projected future cumulative development traffic for the wider area, which includes the Gatwick expansion.

13. The development is projected to emit 95,000 tonnes of CO₂, but only 63,000 tonnes are allowed. How will this be mitigated?

The figures stated above don't correlate with calculations in the Climate Change Chapter of the Environmental Statement. It's not clear from where these stated figures originate. The Tyndall Centre Horsham District Council (HDC) local carbon budget only considers operational energy consumption and therefore appropriately the operational energy demand of the Proposed Development has been compared to the HDC carbon budget.

As shown in **Table 9.22 of the Environmental Statement**, the emissions from operational energy use are 10,867 tonnes of carbon dioxide equivalent (tCO₂e). As shown in **Table 9.25 of the Environmental Statement**, when compared to the HDC carbon budgets, the Proposed Development is expected to contribute to:

- 0.2% to the fifth energy carbon budget (2028-2032);
- 0.8% to the sixth energy carbon budget (2033-2037); and
- 0.6% to the seventh energy carbon budget (2038-2042).

14. Building on the golf course nature reserve will destroy key biodiversity and green space—the only major open space in Crawley. How is this justified?

Other than for the existing Public Right of Way, Ifield Golf Club is not a public open space. Neither is a designated nature reserve.





Biodiversity effects on the golf course have been considered, as they have for the whole of the Proposed Development site. Where feasible key habitats within the golf course are being retained. However, where they are lost, these have been considered as part of the BNG assessment and form part of the baseline position against which a 10% gain has been demonstrated.

Furthermore, there is an ecological buffer provided to the adjacent Hyde Hill wood. This landscaped area north of Hyde Hill Ancient Woodland will be safeguarded and managed for nature conservation in order to provide habitat for bat species identified within the area and adjacent Hyde Hill Wood.

15. The scheme promises a 6.2% biodiversity gain, yet the legal requirement is 10%. How will the legal requirement be met?

The reference to 6.2% pertains to the BNG metric which solely relates to the Phase 1 (full) component of the Proposed Development – i.e. the CWMMC, highway and utility infrastructure

However, when considering the Proposed Development as a whole it is the overall BNG assessment for the hybrid area (not just the area which is applied for in detail) which should be reviewed as detailed in the West of Ifield Biodiversity Net Gain report. **Please refer to the submitted BNG report, prepared by Ramboll.**

16. With wildlife already being pushed towards the village and killed along roads, how will the scheme prevent further ecological damage?

Chapter 8 of the Environmental Statement outlines the likely ecological effects to arise from the proposed development. A significant number of ecological surveys have been undertaken and are ongoing by qualified specialists by desk-top and field surveys to establish the baseline condition over a number of years. Further details of the surveys undertaken are set out in Chapter 8 of the Environmental Statement. The ecological surveys have informed the design process, ensuring mitigation, such as avoidance of sensitive areas or retention of habitats has been included in the overall scheme design. In most cases the inclusion of further mitigation measures (notably through a Construction and Environmental Management Plan) is considered sufficient to reduce the significance of the impacts to a minor or negligible effect (as determined by the Environmental Impact Assessment regulations).

These surveys have informed the design and layout which includes ecological buffers and ecological corridors in mind so that wildlife can move around and through the Site.

There are a number of “control” documents as part of the planning application which ensure environmental protection is at the forefront of any development. These include the landscape parameter plan which restricts development in areas which are protected for nature conservation, the Biodiversity





Net Gain assessment which must legally be adhered to, landscape and ecological management plan and further requirements which will be secured via planning condition and obligation.

There is also an obligation to implement and comply with an approved Ecology and Green Infrastructure Strategy, which will be secured via planning condition or S.106.

17. Why has Crawley Borough Council formally opposed the scheme, yet it is still being advanced?

We recognise that CBC has concerns regarding the impact of West of Ifield on local infrastructure. However, Crawley is unable to meet its housing needs within its boundary, and it acknowledges in its adopted Local Plan that there is a need to work with its neighbours to provide for Crawley residents. West of Ifield is best placed to do this. Not just because of its geographical location but also due to our ability to secure a number of significant infrastructure benefits as part of the development which will positively meet both Horsham and Crawley's needs. This includes the early delivery of a Secondary School to meet existing needs in partnership with the Department for Education, a primary school (with SEND and nursery provision), community facilities including primary health care (working with NHS Sussex), sports pitches and leisure centre and employment opportunities.

As cited in HDC's Housing Officer's response to the planning application, the affordable housing element of the proposed development is proposed to be shared between both local authorities.

The Parish will also be aware of proposals for Local Government Reorganisation, with Mayoral elections planned for May 2026. This will result in potential amalgamation of Horsham and Crawley, along with other Local Authorities and a stronger focus on meeting combined housing needs within any new local authority boundary. This will aid the sharing of benefits of the proposed development, not limited to council tax and business rates from the proposed development.

18. Why has there been no engagement with the Parish Council (PC) regarding transport, open spaces, and other community issues?

Homes England has sought engagement on these matters during our public consultation events, which are detailed in the **submitted Statement of Community Involvement**.

As stated at the Parish Council presentation and as previously communicated, the West of Ifield is a long term project with multiple opportunities for ongoing discussion and conversation on specific issues (including stewardship) as and when the full details are understood. Homes England remain committed to engaging with Ruspur Parish Council throughout the process to ensure the full potential of the development and opportunities arising from it are maximised, as well as ensuring that any concerns are understood and addressed through the delivery of the scheme.





19. Open spaces are supposed to be provided—why has there been no consultation with the PC about their design or use?

As above, the West of Ifield is a long term project with multiple opportunities for ongoing discussion and conversation on specific issues (including stewardship) as and when the full details are understood. Homes England remain committed to engaging with Rusper Parish Council throughout the process to ensure the full potential of the development and opportunities arising from it are maximised.

Homes England has developed an initial vision that will underpin the long-term stewardship arrangements for the West of Ifield scheme. The vision proposes a holistic approach, focusing on both the need to manage and maintain a range of community assets that will be delivered onsite, alongside a community development role. The purpose of the latter is to create a positive and inclusive place for both new and existing residents. The vision also highlights the aspiration for the long-term stewardship arrangements to be financially viable; this is essential to enable the long-term stewardship activities to be implemented successfully and in perpetuity.

It is anticipated that a bespoke long-term stewardship vehicle (organisation) will need to be established for at least some of the assets proposed at the West of Ifield, such as the country park and Ifield Brook Meadows. These will all have maintenance/management obligations, but different approaches will be applicable to the different asset. The land uses which are considered appropriate to form part of a community led stewardship arrangement are as follows:

- Open space, sports provision and recreation – Range of organisations including district or parish councils; management company; stakeholder with an interest in long-term stewardship or a bespoke long-term stewardship vehicle;
- Including Ifield Brook Meadows, Country Park, allotments, play areas (including trails and cycle paths/tracks), amenity green space, sports facilities and playing pitches;
- Community centre and uses – Range of organisations including district or parish councils; stakeholder with an interest in long-term stewardship or a bespoke long-term stewardship vehicle;
- Including Ifield Barn Theatre, Town Square, Leisure Centre (with swimming pool), Public Art; and
- Shared spaces, including highways – Range of organisations depending on whether the assets are adopted.

Detail on the preferred long-term stewardship approach(es) will be secured through the Section 106 Legal agreement. This will fix the agreed management structure and the financial support provided by Homes England. Input into this process to ensure that the preferred approach(es) are robust and implementable is proposed to run in parallel to the planning determination. The design and use of these spaces will be determined at Reserved Matters stage.





In addition to transferring assets, at Brookleigh and Northstowe we have funded a Community Liaison Officer role as part of the Section 106 Agreement. At Brookleigh, this requires payment from Homes England to Mid Sussex District Council of £40,000 per annum for a period of 10 years. We will be engaging with HDC and CBC through discussions to understand and agree whether a Community Liaison Officer role should be included as part of the Section 106 Agreement.

20. Promised facilities like the supermarket have been withdrawn—how can residents trust other promises (e.g. schools, transport)?

Homes England understand that the reference to the supermarket withdrawal is in relation to another development but appreciate how experiences of development elsewhere can impact the trust residents have in future proposals.

A key role of Homes England is not just to facilitate new homes, but also to ensure that new homes are supported by community needs and high quality placemaking. These drivers are set out within our Strategic Plan 2023-2028 and are critical to the Agency's Key Performance Indicators which are used by Government to judge our success.

As part of the planning application, we will be required to commit to the land uses and proposals set out within our planning application.

Our commitment to early infrastructure has driven the structure of the planning application to be in hybrid, which has required Homes England to expend significant resources to design the early infrastructure in detail up front. Many outline planning applications do not commit to this level of work at this stage.

As set out above, we have entered into Heads of Terms with the Department of Education for delivery of the Secondary School. In respect of the primary school, early years provision and SEND contributions, these financial contributions have been secured as part of our funding approval from HMT.

21. Public transport is not viable if bus routes are empty (Mowbray buses have a maximum of 3 passengers). How can buses be presented as a sustainable solution when residents will not realistically use them?

A bus strategy has also been developed, as part of the Transport Assessment and mitigation strategy. The bus strategy has been developed in discussion with Metrobus, the main bus operator within the Crawley area and the most likely provider of new bus services to the Site, and has had input from WSCC, HDC and CBC. Homes England has committed to providing a financial contribution, to be phased, as revenue support



to WSCC to secure the necessary bus services to establish the public transport strategy and achieve targeted mode share. This will be aligned with the revenue model and assumptions discussed with Metrobus and provided to WSCC. **Please see the Section 106 draft Heads of Terms.**

The bus strategy has included future patronage assessments which has been agreed with Metrobus. The strategy comprises two “Fastway” services which will serve the Site and provide connections to the wider area to become commercially viable and achieving a 6-10 min frequency ‘Fastway’ service thereafter. Three high quality bus stops as part of integrated mobility hubs are proposed within the development. These are located to ensure that most of development is within 400m of a bus stop, whilst ensuring that the number of stops is limited to enhance bus journey times through the development.

It is expected that these services, which will serve the key destinations for residents as well as providing access to the schools and employment will be very successful as has the Fastway network.

Overall, the future bus services provision (including three high quality bus stops) and **the Umbrella Travel Plan** which will encourage a behaviour change and include incentives towards bus use, will help to ensure that bus routes are widely used. These include, as an example, Sustainability vouchers for the first occupiers of each home. These will provide subsidised bus based public transport for 3 months. They will be included within the Welcome Pack when residents move into their properties. The intention of this is to encourage regular use of these services from the outset of living at West of Ifield, to support sustainable travel behaviours.

22. Residents already struggle with electricity capacity—how will infrastructure be upgraded to cope with thousands more homes?

Please refer to section 4 of the Utilities Statement. Electrical upgrades and reinforcement are proposed as part of the scheme, including the development of a new primary substation. Homes England are in discussions with UK Power Networks to secure the electrical power capacity for the West of Ifield development.

23. Access to schools like Bohunt is already difficult for local children. How will school places and transport be managed for the expanded population?

West Sussex County Council are both the local education, and local highway authority. It is their responsibility to allocate school places.

The Secondary School is proposed to provide school spaces for both children from West of Ifield, and to meet existing shortfalls in Secondary School provision. The Primary School is proposed to meet the needs of new residents at West of Ifield.





In terms of transport, **please refer to page 51 of the Infrastructure Delivery plan** which summarises who would be responsible for construction and delivery of proposed works. It is anticipated that new primary roads would be adopted by West Sussex County Council, secondary / estate roads would either be adopted or managed by a management company or stewardship organisation. The management and maintenance would be controlled by a Section 106 or Section 278 legal agreement.

24. Why has the planning application been submitted when the Local Plan is not yet adopted?

Homes England has supported the Local Plan process for both Crawley and Horsham for a number of years. We have always committed to submitting a planning application in parallel to when the Local Plan was due to be adopted, which was programmed for around May 2025.

Whilst the Local Plan has paused, it has not yet been withdrawn. There are a number of compounding factors adding pressure to the need for housing within the North West Sussex Housing Market Area:

1. The Government's objective for delivering 1.5 million homes within this parliament. Homes England's remit it to deliver the policy objectives of Government.
2. There have been significant changes through the National Planning Policy Framework to the housing requirements, both in Horsham and in Crawley.
3. Housing affordability continues to increase well above the national average.
4. Water Neutrality has restricted the delivery of new homes since 2021.

Horsham District Council are currently unable to demonstrate a five-year supply of deliverable housing and the presumption in favour of sustainable residential development is triggered in line with the National Planning Policy Framework. Therefore, the Proposed Development will seek to meet this acute need for housing and will provide significant public benefits (for example affordable housing, education and public open space).

Significant evidence has been produced by both HDC and Homes England to validate the capacity of the Site to support development. Suitability for development has been tested and demonstrated as part of the emerging Local Plan process, where it was proposed to allocate West of Ifield. To date, the Inspector has not identified any issues with West of Ifield or the supporting evidence base.

Please refer to Horsham District Council's Shaping Development in Horsham District document which states:

https://www.horsham.gov.uk/_data/assets/pdf_file/0016/150802/Shaping-Development-in-Horsham-District-Planning-Advice-Note.pdf





Paragraph 5.7 It is the Council's view that the proposed site allocations are based on robust evidence, most notably site assessment work and were capable of accommodating sustainable development. For this reason, the Council will consider positively proposals on sites identified in the emerging Local Plan (eLP), which accord with such evidence and are in accordance with (non-housing supply) HDPF or Neighbourhood Plan policies. Therefore, the Council would encourage applicants to have regard to site-specific matters identified in relevant eLP, including the quantum of development.

Paragraph 5.8 Such advice is issued in recognition that the eLP Inspector has not indicated any specific concerns with proposed site allocations in his Initial Findings Letter, though concerns have been expressed about whether the overall quantity of homes being planned for was sufficiently high to meet the District's identified housing need, as well as unmet needs arising elsewhere.

Paragraph 5.15 Notwithstanding the expectation that applications for full planning permissions will be made, the Council recognises that on large and/or complex sites, applications for outline planning permission may be submitted. In such instances, the Council would prefer hybrid applications that seek full planning permission for part of their proposal (including initial development phases) with an outline application for the remainder of the site.

The scale, function and land uses of the Proposed Development has been discussed extensively with HDC, CBC and WSCC officers, to ensure that the potential impacts of the proposals are understood and appropriate mitigation is identified. The Site will provide strategic-scale development in a sustainable location that is appropriate for the settlement type and purpose.

25. Many issues (e.g. water supply, primary care, sewage) depend on Local Plan policy. Isn't the application premature without these being addressed?

The items identified are subject to national planning policies and legislation in addition to locally set policies. This ensures that sufficient capacity is provided to support the development ahead of the occupation of homes.

The emerging allocation for West of Ifield has been in Horsham District's emerging local plan for a number of years and subject to extensive pre-application engagement with statutory providers well aware of this potential scale of development in this location.

As set out in response to Question 24, the Local Plan evidence base assessed the suitability of West of Ifield for development and are considered up to date. Applications for emerging allocations are therefore supported by HDC's "Shaping Development in Horsham District" document.





26. HDC's own site assessments indicate that some sites in the Local Plan did not meet spatial policy tests—how can this site be justified?

Horsham District Council are leading the production of the Local Plan, of which West of Ifield was one of the emerging allocations. The site assessment, and broader evidence for the Local Plan, supported the allocation of West of Ifield which is why it was included in the emerging Local Plan.

Please also see section 6.3 of the submitting Planning Statement, which notes that notwithstanding that limited, if any, weight can be applied to the emerging plan, elements of supporting evidence base provide evidence of up-to-date need which acts as a material consideration. This position is reinforced from the Inspector's Interim Findings letter (dated 4 April 2025), which states (when recommending HDC withdraw the emerging local plan and recommence preparation) *"In doing so the Council could utilise much of the good and comprehensive work already undertaken before components of the evidence base become out of date"*. In addition to the evidence base produced by HDC, Homes England have provided a significant element of site specific evidence and assessment work which has comprehensively tested the emerging proposals and final submission.

Further to the above questions, Homes England also record the following comments/questions during the meeting:

a. Coalescence

Coalescence between settlements has been considered. To the west and south- west of the site views of the development are partially or wholly obscured by the intervening vegetation comprising significant woodland blocks as well as existing landform. A significant green gap between the application boundary Site and Horsham in excess of 4km is retained, maintaining separation between settlements. There is no visibility of the Site from the eastern edge of Horsham. The site is also well screened from the existing neighbourhoods of Crawley. **Please refer to Chapter 11 of the Environmental Statement** in addition to Appendix 11.1 - Landscape and Visual Assessment Methodology. This includes the methods used to determine the baseline conditions, the sensitivity of the landscape and visual receptors and the predicted magnitude of impact and sets out the approach to judging the level and significance of likely landscape and visual effects. Technical Appendix 11.2 – Landscape Character Assessment: provides more information on landscape character in addition to published landscape character assessments.

b. HPA refers to job creation but jobs are all low paid, CBC need employment land

Please refer to the submitted Economic Development and Delivery Strategy submitted with the planning application. This strategy was prepared following consultation with key stakeholders, particularly the two local planning authorities (Horsham District Council and Crawley Borough Council). Many other partners and stakeholders have also contributed to it including Coast to Capital Local Enterprise Partnership, Manor Royal Business Improvement District, Gatwick Diamond, Gatwick Airport and West Sussex County Council.



The employment strategy for West of Ifield is defined around the following core elements:

- making provision for enterprise and innovation, through the establishment of an Innovation Centre at the heart of the new community and adjacent to the main neighbourhood centre
- designing in provision for a range of flexible, business accommodation, including:
 - a range of small hybrid workspaces (studio offices and workshops) that can be used for a variety of purposes and are designed to be relatively affordable
 - “grow-on” space, targeted at small companies both graduating from the Innovation Centre but also appealing to small companies in the wider area, seeking slightly larger, more flexible floorspace
 - some larger, hybrid units that could be used for both light industrial and general industrial purposes, together with a range of support uses
 - the potential for storage / distribution uses, particularly those looking for local delivery outlets
- developing an integrated Neighbourhood Centre, to provide a mix of uses and facilities to support the area including community uses, commercial / retail / leisure uses, and business uses – to provide a sustainable service / supply for residents
- developing a strategy for accommodating working from home, recognising that this is likely to be a long term feature of economic life post-pandemic; this will include work areas within residential units, a juxtaposition of workspace with neighbourhoods and a reliance on high quality broadband.

The EDDS includes the provision of employment and training initiatives on West of Ifield through commitment to an Employment and Skills Plan, to be agreed with the Local Authorities. This will be secured through the Section 106 Agreement and Homes England will ensure that our developer partners are responsible for delivering its requirements. Developer contributions will also be sought to support the Authorities in the borough wide coordination of training and employment schemes supporting local people in gaining access to the job market. Contributions will again be agreed and secured through a S106 agreement.

Section 8 and Table 8.4 within the Economic and Employment Delivery Strategy provide an assessment of the types of job created through the proposed development which cover a number of themes including jobs from the employment floorspace (mixture of office space and general industrial floorspace, jobs from the education uses, jobs from the health care, jobs from the neighbourhood centre (retail, leisure, community, innovation centre, hotel and nursery) and jobs from construction of the development.

d. Emergency vehicles and the bus gate

These proposals have been discussed with Thames Water, who are agreed in principle to the strategy, and that additional flows can be met through planned upgrades to the foul water network. Where upgrades are needed in the vicinity of the site, sufficient safeguarding of land has been allowed for within the parameters to ensure these can be delivered.





e. Need hospital / no mention of East Surrey

The Infrastructure Delivery Plan (section 4.7) provides an assessment of existing health facilities; this includes East Surrey Hospital. Homes England have been engaging with the NHS Sussex Integrated Care Board for a number of years to understand their requirements for West of Ifield. The NHS has been explicit that their agenda for secondary health care provision i.e. hospitals is refurbishment of Crawley Hospital, not a new hospital at West of Ifield. The NHS engagement has informed the development parameters for the proposed development, and as per their consultation response to the planning application, they are seeking the construction and fit out of a primary health care centre at West of Ifield. Homes England continue to discuss the occupation of this facility with the NHS to ensure their will be GP provision onsite.

f. Funding

HM Treasury has approved funding for Homes England to undertake the role of masterdeveloper for the construction of West of Ifield. This investment will be used to deliver enabling infrastructure to unlock serviced land and to meet planning obligations associated with the site.

Homes England's remit it to implement policy set by Government. This is very clearly set out in **a letter by Matthew Pennycook MP, Minister of State for Housing and Planning in his letter to Homes England in September 2024**

https://assets.publishing.service.gov.uk/media/66faac3ee84ae1fd8592eb67/Homes_England_Chair_s_Letter.pdf This letter set out seven immediate priorities for the Agency, with the first being:

"First, urgently addressing the reduced rates of housebuilding we have inherited is essential to delivering our 1.5 million new homes target and I therefore expect the Agency to do everything in its power to accelerate development and increase delivery in 2024/25. This will require an increase in the Agency's offer and role as master developer; better leveraging of funding programmes; and a greater willingness to utilise the existing powers available to it (including the rarely used compulsory purchase power). As part of a renewed drive to lay the foundations for increased housing delivery, I expect the Agency to work quickly with the Department to implement the Public Bodies Review's conclusions on streamlining processes including the securing of required financial flexibilities and increased delegations from HM Treasury;"

g. Northstowe

At Northstowe, Homes England did not own or control phase 1 of the development. We are working hard in phase 2 to provide the infrastructure that is required. Homes England has already built a school and an SEND centre, and the first shop is in this phase too. This demonstrates that we understand what is required to build communities and we provide it.

We are an accountable public body with a statutory requirement to deliver housing where it is most needed, promote sustainable development and secure high-quality design. We take a longer-term view on our schemes, prioritise placemaking and ensure that infrastructure is delivered alongside new homes.





Homes England secures long term capital funding for projects as part of our established and approved investment programmes.

Unlike more traditional developers or site promoters, we have a number of strategic objectives (set out below) that directs our activity, providing the certainty that future investment decisions will be aligned with delivery of our vision and ambition for Ifield.

h. CBC – no planning application for Meadows Ped/Cycle link

The proposed off-site pedestrian/cycle link through Ifield Meadows is within CBC’s administrative boundary and form part of the off-site mitigation package for the Proposed Development.

Ifield Meadows is within Homes England’s ownership, as shown in the Land Ownership Plan, and therefore its delivery will be secured via a specific Section 106 obligation in association with the planning application. **Please see the submitted Draft Heads of Terms.**

i. IGC – mitigation quoted as “minor” improvements

Please refer to the submitted Golf Course Assessment Part C: Potential Golf Investments following the closure of Ifield Golf Club, prepared by FMG Consulting. FMG Consulting Limited were appointed by Homes England to review a list of potential improvements at Tilgate, Goffs Park and Rookwood Golf Clubs. The proposed works have been informed by improvements plans prepared by the operators of these facilities, which are leased from CBC and HDC. These improvements are being considered as part of a package of mitigation measures related to the loss of Ifield Golf Club, to meet the requirements of Paragraph 104 of the NPPF.

The purpose of the report is to establish which of the potential mitigation measures is most effective, makes a positive contribution to mitigation objectives and inform discussion around future mitigation package as part of a Section 106 Agreement. It also seeks to better define each mitigation measure, validate its achievability and demonstrate its deliverability in consultation with club owners and operators. The short list of recommended improvements has been discussed, and shared with, Sport England, England Golf and leisure officers at HDC and CBC. As part of the preparation of the report, FMG Consulting undertook an engagement exercise with members and operators at Ifield Golf Club, Tilgate, Goffs Park and Rookwood.

The short list of proposals is shown below, and Homes England disagree that these are “minor” in nature.





Table 5.1 – Prioritised (Ranked) List.

Ref	Site	Course Mitigation Proposal
C1	Tilgate Golf Centre	Improve course drainage
C5	Tilgate Golf Centre	9 hole Reinstatement
C11	Tilgate Golf Centre	Improve social space in the club house and enhance shop
R1	Rookwood Golf Course	Sustainable Adventure Golf
C14	Tilgate Golf Centre	Tarmac the adjacent car park and install pay & display machines
R5	Rookwood Golf Course	Greens, tees, bunkers, irrigation pump upgrades

The proposals consider the capital costs, net revenue, sustainability and additionality of the investments as well as the impact on participation of traditional golfers, new golfers and more importantly the migration of existing golfers playing at Ifield Golf Course.

j. Flooding – do plans take into account climate change

The flood risk assessment prepared, as required by the Environment Agency, takes account of Climate Change Allowances Guidance. The assessment includes consideration of all sources of flood risk over the development's lifetime, factoring in climate change.

k. Design of neighbourhood centre

The neighbourhood centre has been designed to be at the heart of the scheme in order to support the creation of a sustainable community. The position of it has been focused on ensuring it can be easily accessible by all modes of transportation, promoting inclusivity and accessibility for all residents. To the west of the neighbourhood centre is the Secondary School. The land use parameter plan fixes the school buildings closest to the market square, with its playing pitches on the western edge of the site. Beyond this area fixed within the parameter plans for nature conservation. This arrangement will be fixed by the outline planning permission and further reinforced by the site wide design code, preventing an expansion of the neighbourhood to the west and suggested by Save West of Ifield.

l. Safeguard land for the CWMMC

The emerging Local Plan set out an indicative safeguarded area of search for the full CWMMC corridor, shown on the Policies Map. Strategic policy HA2 required land at West of Ifield to not prejudice delivery of the full CWMMC corridor. Horsham District Council’s Shaping Development in Horsham District document states “The Council would encourage applicants to have regard to site-specific matters identified in relevant eLP, including the quantum of development” (Paragraph 5.7).The planning application proposes an area of safeguard land so that the route of the CWMMC can be facilitated, should the Local Planning Authority pursue this at a later date, in order to comply with the above planning requirements.

https://www.horsham.gov.uk/_data/assets/pdf_file/0016/150802/Shaping-Development-in-Horsham-District-Planning-Advice-Note.pdf

