

56 PEVEREL ROAD
IFIELD
CRAWLEY
WEST SUSSEX
RH11 0TH

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Planning Department
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02 January 2026

Dear Mr Hawkes,

Notes and observations on the Design Code and objection to the overall Hybrid Planning application DC/25/1312

I have thoroughly read the sections of the Design Code which are of interest to me and about which I have a certain level of knowledge.

The document is riddled with a surprising number of simple errors pertaining to the site and its surrounds that are easily noticed by even a minimally observant eye. Whilst many of my observations are points of pedantry which, on their own, have no bearing on the application, the errors demonstrate a lack of care taken when preparing the Design Code along with an obvious lack of local knowledge. There are also a few points of contention; things that are being promised without any substance to the promises, things that are being forbidden without any thought be given as to the consequences of doing so, sly use of words that the Planning Officer should be aware of so as not to be made a fool of, and proposals that make little sense to the rational and pragmatic who have an understanding of human behaviour.

Of greater concern, and something that should absolutely be considered by the Planning Officer, is that if the producers of the Design Code have got so many simple things wrong then how can the Planning Officer and general public have any confidence that the more complex topics of the application, topics that require a higher level of professional expertise than the Planning Officer and general public may possess are correct? For example, how can we be sure that the results of environmental surveys, traffic surveys etc. have been interpreted and represented correctly within the application when the creators can't even work out how far away Gatwick Airport is from the site?

My summary will highlight these errors, along with any other observations I have made concerning the validity of this application. These notes are based on the original DC but, at the time of writing, there have been no subsequent versions submitted to the application.

Section 2.1 (page 9 graphic) claims that West of Ifield will... and makes several claims which, whilst sounding good in theory, have no substance to them and present as something which is simply designed to impress. Before the Planning Officer considers this application, he should request that the applicant provide further details about:

- Where the applicant has pledged that *West of Ifield will support...* will they be funding this support in perpetuity or will the support cease once planning permission has been granted? Are these merely a smattering of buzzwords about shiny little things to add some sparkle to a ridiculous proposal in order to impress a planning officer?
- *Support active healthy lifestyles.* How, exactly, will applicant do this?
- *Support diverse activities across the development.* Could the applicant give some examples of these *diverse activities* that they will be supporting and how they propose to support them.
- *Connect residents with nature through recreation, play and education.* What *recreation* and *play* facilities will be provided? How will the *education* be delivered? Nice words but, in reality, we know that the *recreation* will be a gate into a sort of manufactured countryside (in place of the real countryside that currently exists), the *play* will be a couple of sawn up tree stumps (maybe taken from the veteran tree that has to die to make way for the CWMMC) and the *education* will be a rapidly fading 'information' board with dumbed down KS1 level details about local ladybirds and acorns.
- *Minimise car parking with the ability to be reduced further over time.* This is just social engineering. A box ticking exercise which will achieve nothing beyond pushing parking onto existing residential roads around the edges of the site which have the misfortune of being a short walking distance away using the proposed new pathways. If the applicant thinks that their new (home buying) residents won't be two car families, with maybe one or two extra vehicles where there are older children, then the applicant knows nothing about the behaviour and desires of human beings, and the estate will end up like most of the others in Crawley which have inadequate parking, with grass verges churned up and cars dumped dangerously near junctions as people jostle to go about their daily business unhindered by social engineers.
- *Provide routes that allow for easy access to other employment centres and the wider area.* Is this not supposed to be a so called '15 minute neighbourhood' where everyone works, rests and plays on site? At the face to face 'consultations' the representatives of Homes England told me that this proposed development would have a negligible effect on local traffic. We all know that is a complete fantasy of course. I'm yet to decide if he was naïve or merely taking local residents for fools. This line in the DC says that one or the other is true and that the applicant knows full well that people will be driving out of the new development onto local roads that are already operating beyond capacity at peak times.
- *Have the potential to provide on-site energy generation.* How will this be achieved? This just seems to be another box tick to please planners without any kind of substance to actually back the words up. They could promise world peace without a plan to actually deliver it!
- *Consider long-term stewardship and community involvement at every stage.* Reading between the lines, this says that anything that is provided by the applicant will then be left to someone else to maintain. But then why would the applicant care? They'll have got what they wanted by that stage so why would they be motivated to maintain any of the features used to sway the decision of planners in their favour?

- *Interaction section.*
- *Provide opportunities for community interaction, in order to combat social isolation.* Some examples need to be given. I suspect they haven't been because 'a couple of hard seats in a cold community square' isn't really going to sell anything to anyone.
- *Encourage residents to influence how community spaces develop.* As an existing resident of the area, I'm more than happy to influence how the whole site develops. Feel free to contact me for ideas - they'll be cheap to implement.
- *Have a strong cultural offering to serve both the community and wider area.* What does this mean? What is a 'strong cultural offering', in English?
- *Be an inclusive, accessible place that connects with existing communities.* Top box ticking here. Inclusive, cultural and diverse all covered off on one page; mission accomplished, comrade, but what does it actually MEAN in practice? Words again. Just meaningless words.
- *Encourage learning across lifetimes.* How will this be achieved? Is the applicant providing free adult education on site? Will there be a fully stocked and funded in perpetuity library provided by the applicant? Does the applicant have a new and innovative method of delivering *learning across lifetimes* that they are yet to reveal, or is this just another meaningless fluffy phrase?

Section 2.2 (paragraph 2) The proposed access onto Ifield Avenue is NOT within Crawley Borough. It is within Horsham District.

Section 2.2 (paragraph 4) Ifield West also adjoins the proposed development site, rather than being 'in close proximity'. In fact, the closest residential houses, within the Crawley Borough Council administration area, to the proposed development are within the Ifield West neighbourhood.

Section 2.2 (paragraph 4) Another neighbourhood in close proximity is Gossops Green. Glossop is a town in Derbyshire.

Section 2.2 (paragraph 5) There is no road known as 'Ifield Wood Road' in the area.

Section 2.2 (figure 4) Gatwick airport is not 7 miles away. In fact, the closest point of the site is less than a mile from the runway at Gatwick. Is this a clumsy attempt to disguise the proximity of a busy international airport to the proposed development, or is the author of this document not quite up to the task?

Section 2.2 (figure 4) Crawley Town centre is not 3 miles away. As the crow flies, it is about 1.25 miles from the proposed pedestrian access near Rudgwick Road, or 1.4 miles (to Crawley High Street) as the boot walks. Perhaps the applicant needs to send some representatives to the area to gain a little knowledge and understanding of the locality before they proceed further.

Section 3.2.1 (figure 53) When determining a walking distance/time, the radius is irrelevant and the distance should be determined by the actual distance that is required to be walked. It's a little concerning that this fundamental point needs highlighting to those who I assume to be professionals in their field. It feels as though those who are self-righteously attempting to socially engineer people out of their cars have never actually walked anywhere themselves.

Section 3.2.2 (Vision and Objectives) claims that *West of Ifield will provide jobs for local people, all located within walking distance of public transport.* I would invite the applicant to reveal which businesses have signed contracts to relocate their operations to the proposed development which will enable the applicant to meet this pledge. We wouldn't want the casual observer believing that this is just another collection of meaningless words designed to curry favour...

Section 3.2.3 (Vision and Objectives) claims that *West of Ifield will... contain a range of retail, commercial... uses...* Once again, I would invite the applicant to reveal which businesses have signed contracts to inhabit the *well-designed buildings* referred to. Without contracts, this is just another empty promise. A wish list, rather than a guarantee.

Section 3.2.3 (impact on residential) states that *Future detailed codes should demonstrate that there would be no harm to residents arising from noise, pollution or other impacts of commercial and community uses.* No, they MUST demonstrate this. 'Should', like in the highway code, has no authority in law and merely states best practice, whereas 'must' is legally binding. If the applicant is permitted to proceed with this proposal, then the conditions MUST stipulate that the applicant MUST demonstrate that there would be no harm to residents arising from noise, pollution or other impacts of commercial and community uses. To allow 'should' to be used, is to allow the applicant to not bother and later, rightly, claim that they have no legal obligation to do so. As a footnote to this, I note that 'must' is used in some places, most notably when discussing that the site MUST provide a traveller site... **Don't allow the applicant to pull the wool over your eyes with the use of sly wording, HDC.**

Section 3.3.9 (Vision and Objectives) states that *...form part of the wider nature recovery network...* Could the Applicant explain what it is, exactly, that nature will need to recover from, given that most of the paperwork goes to great lengths to make (unverifiable) claims that the proposal will deliver a 10% 'bio-diversity net gain' (stop giggling at the back, boys!).

Section 3.3.9 (OPA Coding part 3) states that *various methods will be used to deter access*, but the land immediately adjacent to the north west of the site, between Ifield Court and Ifield Wood (marked on Figure 103 as Ancient Woodland), is common land and to impede the access of commoners to this land would be in contravention of the Law of Property Act 1925. Is the applicant aware that their site adjoins common land, is this another topic that they lack knowledge of, or are they continuing the theme of attempting to do as they please regardless?

Section 3.3.9 (Reserved for Detailed Designs: Houses and buffers) I assume (and hope!) that the reference to front boundary markers having a maximum height of 1 metre high to allow for surveillance refers to surveillance OUT, in a neighbourhood watch kind of way, rather than surveillance IN to people's homes! Maybe this is to check which naughty new residents own a car...

Section 3.3.10 (Table: Badger Setts/Zone of Minimal Human Disturbance) 25 metres or 15 metres; which is it? This is a lazy & careless poorly edited copy and paste which means the applicant has failed to provide necessary details in their application. There's an E- awarded to the proof reader too!

Section 3.3.10 (footnotes) The information in the table is rendered a pointless exercise by the footnotes, which essentially say that they will be ignored where it becomes economically unviable to do so or where the applicant simply can't be bothered to work around them.

Section 3.3.17 (OPA Coding item 2) says that *development must be delivered at densities as shown in Figure 136*. Figure 136 shows Lower Density housing, but this contradicts the majority of the masterplan, which shows varying levels of density. Note that this is a 'must', so the applicant is saying here that low density housing will be a legally binding requirement of the development. I'm sure this is just another careless error and they actually meant Figure 137, but the levels of incompetency displayed by the professionals who have created these documents in order to try to push through a c.£1bn development is astounding and must surely bring the integrity of the entire proposal into question.

Section 3.4.1 (OPA Coding item 1) says that *Building heights must not exceed the maximum heights as shown in Figure 140*. Figure 140 shows low rise, 2 storeys plus attic houses. Again, note the use of the word 'must', though the assumption must be that Figure 141 was meant. Further evidence of professional negligence on the part of the creator of this document. Like the proposal as a whole, the document is rushed, hasn't been checked properly and demonstrates a complete lack of attention to detail, something which can't be allowed to happen if the proposal is approved. The preferred way of ensuring that the whole project is not beset by these same problems is to refuse it, as the applicant clearly can't be trusted to undertake this development in a competent manner.

Section 3.4.2 (Reserved for Future Design stages: aesthetics) says that *Attention to the overall aesthetics and visual appeal of the housing or apartment complex should be considered. Landscaping, attractive façades, and cohesive design elements to create an inviting and pleasant environment should be included*. Note the use of 'should' here because, based on the images scattered throughout the application, this was certainly deemed to be a choice. I know it's a subjective thing, but they look horrendous and some resemble the worst of the 1960s built inner city sink estates, whilst those shown on page 100 (section 4.3.4), particularly Figures 39, 40 & 41, remind me of the cheap pre-fab apartments provided at a Butlins holiday camp. They certainly don't present *an inviting and pleasant environment*, that's for sure. The label attached to Figure 142, *examples of good housing/apartment designs*, is misleading at best.

Section 3.4.2 (Sub character area 1) pledges that *it will provide... health facilities*. The applicant needs to expand on this promise and make public the commitment made by Surrey and Sussex Healthcare NHS Trust to operate these facilities. Until this commitment is produced, it is merely an empty promise and we all know that it will never materialise. Similar promises were made for Kilnwood Vale, but have never been met (along with the fantasy Railway Station). Hopefully HDC planners will be once bitten, twice shy and won't fall for empty promises a second time round. Learn from your mistakes, HDC

Section 3.4.2 (Key area A) says that *the square shall be a flexible space playing host to festivals, community events, pop-up shops, food stores and farmer's markets*. Could the applicant expand on this and demonstrate that they have a pipeline of promoters, businesses and farmers who have committed to, or at least expressed an interest in, helping the applicant to meet this pledge.

Section 3.4.2 (Sub character area 3, paragraph 2) says that *the secondary school will provide West of Ifield with a wealth of community level sporting facilities*. Such as? Could the applicant provide more details on what these facilities will comprise of.

Section 3.4.2 (Sub character area 3, paragraph 4) says that *long views over open countryside* will be provided from the Neighbourhood Centre. Could the applicant explain what long views over open countryside will be provided from the low, flat ground, surrounded by high rise buildings (not notwithstanding that Section 3.4.1 (OPA Coding item 1) says that all buildings must be low rise...) on which the neighbourhood centre will be built,

particularly as the rest of the document consistently states that *key views MUST be terminated by marker buildings*, as though the residents are not allowed to have views. How are *long views over open countryside* to be provided from an enclosed space on low ground against the backdrop of this ‘must’ be terminated contradiction?

Section 4.2.9 (OPA Coding, item 1) says that *The Primary School must prioritise access by cycling and walking. Vehicle access to school sites should be limited to staff and delivery vehicles only* which demonstrates a negligent ignorance of human behaviour on the part of the author and will result in nearby streets being overrun with badly parked cars whilst parents walk their children into school, creating additional unnecessary danger for those who DO walk. This policy is nothing more than the sacrificing of the safety of Primary School age children on the altar of idealism in a misguided attempt to impress decision makers.

Section 4.2.10 (OPA Coding, item 1) attracts the same scrutiny as the previous point. Additionally, the need for secondary school places in Crawley is in the east of the town, as the Forge Wood development has so far failed to deliver, so car journeys will be a necessity regardless of the fantasy claims or misguided beliefs of the applicant.

Section 4.2.10 (figure 18) has a caption referring to Primary Schools (note the plural), but a key which refers to the illustrative view of the Secondary School. It seems that the applicant is a little confused about what they’re actually proposing.

Yours sincerely

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