

56 PEVEREL ROAD
IFIELD
CRAWLEY
WEST SUSSEX
RH11 0TH

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23 December 2025

Dear Mr Hawkes,

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

I have thoroughly read the sections of the Design & Access Statement 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 my observations are, generally, points of pedantry which, on their own, have no bearing on the application, what these errors demonstrate are a lack of care taken when preparing the masterplan and an obvious lack of local knowledge.

Of greater concern, and something that should absolutely be considered by the Planning Officer, is that if the producers of the Masterplan 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 that the Planning Officer and general public may not possess or understand, 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?

My summary below 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 DAS, but I have crosschecked against the subsequent revision to ensure my observations remain valid.

Section 2.2.1 (paragraph 2) claims that Faygate Lane, Lambs Green Road and Ifield Wood define the northern and western boundary of the Site. There is no road known as 'Lambs Green Road' within the area, and Lambs Green and Faygate Lane do not define the boundary of the site; at their nearest points, Lambs Green is c.1.3km from the site and Faygate Lane c.1.6km. This seems to be either a faux pas revealing that the long term plans are to return to the originally proposed 10,000 unit development, or a careless copy and paste from documentation originally prepared in relation to that proposal.

Section 2.2.2 (paragraph 2) claims that Kilnwood Vale will deliver a library, a public house, a primary care centre, a care home and a railway station are false. The estate has none of these amenities and setting aside a token parcel of land and leaving it up to the

relevant authorities to decide whether or not to provide them does not equal delivery! Further, both the planning application documentation and Network Rail have made it clear that there will not be a railway station at Kilnwood Vale. It feels very much as though the applicants for Land West of Ifield are using a false claim as mitigation for the chaos that WOI will cause on surrounding roads and the planning officer should carefully scrutinise every aspect of the application for other such deceitful mitigations beyond those highlighted by this document.

Section 2.2.2 (paragraph 3) claims that that one primary school has already been delivered in the North Horsham (Mowbray) development. A secondary school is open, but there is no primary school within that site.

Section 2.2.2 (figure 8) originally used my intellectual property without authorisation, having taken it from the Rusper Parish Council website. A new version of the document has been submitted, the original removed from the application and the matter has been settled privately between the organisation responsible and myself, but nonetheless this constitutes an error on the part of the applicant and demonstrates their attitude towards following due process.

Section 2.3.1 (paragraph 1) Repeats the error highlighted in Section 2.2.1 (paragraph 2)

Section 2.3.2 (paragraph 3) claims that Rusper has a hotel and some shops. The hotel has been closed since 2020 and there is a single shop, not the 2 or more implied by the pluralisation of the word. This appears to be either a clumsy attempt to make Rusper Village appear less rural than it actually is, or simple ignorance of the local area demonstrated by someone desk based who has never actually visited the area to study it for themselves.

Section 2.3.2 (paragraph 5) claims that Rusper, Faygate & Charlwood rely on Crawley for education, in a poorly executed opaque attempt to justify the development on the grounds of it providing a school. Rusper & Faygate are in the catchment areas for Horsham schools, and Charlwood is in a different county (and, hence, is served by a different Local Education Authority)! None rely on Crawley.

Section 2.4 (figure 22) has several errors, showing, for example, Southgate West and the 'Crabber Park' estate in Pound Hill as being part of the original 9 Crawley Neighbourhoods. The apparent mortarboard symbol, shown over Crawley College and the Arora Hotel(!) is not included in the key, no schools are shown despite having a symbol noted in the key, and the only religious establishments marked are the Parish Church of St John and the Friary church in Crawley. The early 13th century Parish Church of St Margaret, right on the edge of the proposed development, is particularly conspicuous by its absence of a marking.

Section 2.5.10 (paragraph 3) claims that Bohunt School, at North Horsham, is *being* delivered. Bohunt School opened in 2019 and is now in its 7th academic year of pupil intake. More evidence of careless copy and pasting from past documentation, or purely ignorance?

Section 3.2 (figure 33) is labelled 'Bewbush New Town' whatever that may be, but It's a photograph looking east along Middleton Way from Peverel Road in Ifield West, adjacent to the site.

Section 3.3.1 (paragraph 1) refers to figure 39, but the topographical image is labelled figure 34. Another example of a lack of care taken in producing a document that the applicant hopes will be used to destroy 171 hectares of arable & recreational land and exacerbate existing capacity issues with the local road network and health care provision.

This may seem pedantic in the extreme, but if the applicant cannot be bothered to carry out simple checks on what they should be considering to be important documents, then what confidence can we in the local community have in them taking care to mitigate against, for example, sewage run off into local rivers.

Section 3.3.1 (paragraph 1) claims that the Russ Hill ridge is 1km to the north west of the site. At its nearest point, the ridge line of Russ Hill is c.2.3km from the site. Is this a faux pas revealing yet to be made public plans for land between Ifield & Charlwood, or simply another demonstration of the authors ignorance of the locality? I suspect they mean the 'Rusper Ridge', which commences c.1km away at Burlands Copse, as this is shown, along with a key view, on figure 34 (not figure 39!).

Section 3.3.2 (paragraph 3) refers to figure 38, but the 'zone of theoretical visibility' image referenced is labelled figure 37.

Section 3.3.4 (paragraph 5) refers to 'These character| areas as shown on Figure 46' (sic), but figure 46 is an image of 'Rusper Road Enclosed Fields'. The Landscape Character Areas are actually shown on figure 48 which is on the following page.

Section 3.3.4 (paragraph 8) claims that "to the south of the Site is I2 Warnham and Rusper Wooded Ridge". The Rusper (to Warnham) Ridge is to the west of the site.

Section 3.4.1 (figure 51) is labelled Ifield Brook, but this is the Mill Stream and has not been Ifield Brook since the late 1600s when the second Ifield Mill was constructed on the site of the present, third mill. Ifield Brook is a few yards to the west of the water course shown in the image.

Section 3.4.2 (paragraph 1) claims that the source of the River Mole is in Lambs Green. The River Mole rises in Baldhorns Copse in Rusper, just to the south of the village centre and Lambs Green is over 2km downstream from here.

Section 3.4.2 (Figure 54) Using an image of an unspectacular late Victorian home to illustrate 'historic cottages and farmsteads', when there are plenty of genuine examples to be found in and around the edges of the site, could be seen as being an underhanded way to underestimate the attractiveness of the genuine historic buildings in the area whose historic setting will be destroyed should this proposed development go ahead.

Section 3.4.5 (paragraph 1) Whilst Ifield Golf Course is technically to the north of Bewbush, the implication that it is adjacent to Bewbush is inaccurate; adjoining the golf course to the south is the Ifield West neighbourhood. Bewbush is c.360m away at its closest point.

Section 3.4.6 (figure 62) is labelled 'Pound Cottages - Listed buildings'. The image shows Old Pound Cottage, which is indeed a listed building. Pound Cottages, which are not listed, consist of a terrace of 4 mid-20th century houses to the east of Old Pound Cottage.

Section 3.4.8 ('Key Features', bullet point 3) Ifield Wood is to the west of the proposed site, not the east.

Section 3.4.8 ('Key Features', bullet points 4 & 6) The veteran trees are in proximity to Ifield Court, not Ifield Manor.

Section 3.4.8 ('Key Features', bullet point 7) The vast majority of the historic field boundaries of Hyde Farm, on the site now occupied by the golf course, are clearly visible

on Lidar imaging and a significant amount remain visible to the naked eye, presenting as mounds or ditches.

Section 3.4.9 (paragraph 1) There are no parks in Crawley called 'Geoffs Park'. There is, however, a Goffs Park.

Section 3.4.9 (figure 68) shows Faygate Playing Fields. 'Sussex Football Academy', a commercial operation, hire a portion of the facility for a couple of hours on a Saturday morning. Labelling the image as 'Sussex Football Academy' seems to be another attempt to deceive the reader, this time into believing that the area offers some form of full time professional football club academy.

Section 3.4.9 (figure 69) There are multiple errors in this figure, as listed below. If something simple like this has an error rate of c.30% (8/25) then what is the error rate on the more complicated aspects of the application that they lay reader may not appreciate?

1. Item 9 is labelled 'Ifield Green Cricket Club'. Not withstanding that there is no such club (it is simply Ifield Cricket Club), the number is incorrectly placed on Rusper Road Playing Fields on the map.
2. Item 10. See my comment relating to Section 3.4.9 (figure 68)
3. Item 11 is labelled 'Rusper Road Playing Field', but the number has been placed on Bewbush Green Playing Field.
4. Item 13 is labelled 'Bewbush Green Playing Field', but the number has been placed on Ifield Green (or Ifield Cricket Club, based on the applicants naming convention)
5. Item 19 is labelled 'Kilnwood Vale Park', but the number has been placed on Cherry Lane Adventure Playground
6. Item 21 is labelled 'Cherry Lane Adventure Playground', but the number has been placed on Kilnwood Vale Park
7. Item 22 is labelled 'Dormans Park', but the number has been placed on Bewbush West Playground
8. Item 24 is labelled 'Bewbush West Playground', but the number has been placed on Dormans Park.

Section 3.5.1 (paragraph 3) states that because the 2021 census was taken during lockdown the travel to work data is 'not representative of the current baseline'. It then goes on to say that therefore 2021 data has been used. Therefore, the applicant is admitting that their movements data is not representative of current trends.

Section 3.7, despite having a section dedicated to bats, omits to mention the Bechstein's bat (*Myotis bechsteinii*) population whose habit is known to be around the site, particularly in Hyde Hill Woods. A cynical person might see this as a crude attempt to gloss over the existence of a protected and incredibly rare species of bat which is described, by those who know better than me, as one of the UK's rarest and most endangered species, with an estimated UK population of just 21,600. Woodland containing this species, such as **Hyde Hill Woods** adjacent to the site, **could be considered for notification as a SSSI**.

Section 3.8 (paragraph 2) refers to 'Badhorns Brook' instead of Baldhorns Brook.

Section 3.9.1 (Listed buildings)

- The Barn and Cattle Shed at Stumbleholm Farm were lost to the storm of October 1987.
- Meeting House Cottage is Grade 2*. There is no such designation as 1*

Section 3.9.1 (Conservation Areas) The paragraph ends abruptly, seemingly without concluding. The incorporation of classical... what?

Section 4.3 (final paragraph) states that “*Feedback forms gave us some headline figures on what local residents' felt were important in creating new neighbourhoods; what kind of homes were needed at West of Ifield; ideas for key focus areas in the Masterplan and ideas on how the development should respond to environmental issues and climate change*”. One piece of feedback that the applicants have failed to note, an element of feedback that was given by an overwhelming majority of local residents, is that the development is both unwanted and unsuitable for the location proposed.

Section 6.4.6 (paragraph 2) refers to the ‘proposed developmetn’. Careless.

Section 6.4.6 (paragraph 5) states that “*For those that do own a car, parking for smaller properties will be remote to encourage other modes first. However for larger properties, some on plot parking will be provided*”. This is unrealistic and constitutes unwanted social engineering that will penalise residents for desiring independence and potentially push car parking into the already busy streets of Ifield (for those in the ‘Meadows’) and Ifield West (via the proposed pathways into Peverel Road and Poynings Road for those on the Golf Course). That is after they’ve undertaken a car journey of between 2 and 4 miles through the rural roads of the conservation area of course, adding to the already poor quality of air in the area and further degrading the quality of life for residents of Ifield Green and the Ifield Village end of Rusper Road. The applicant and their agents clearly have a poor grasp of human behaviour at best and, if the decision makers at HDC have a moment of collective stupidity and grant permission for this ridiculous proposal, then they must make it crystal clear that more than adequate on-site parking must be provided for residents and their visitors based on average household car ownership for rural areas of Sussex. Further, in this crazy age of everyone wins and everybody is equal (!), one must ask if providing the owners of larger properties with a crumb of parking, whilst denying the same to those in lower value properties, is not discriminatory?

Section 6.5 (table) refers to office space being used for the provision of financial services et al. Crawley already has a huge stock of empty office space, despite much being converted to residential use over the last 10 years, so who exactly do the applicants believe will fill new office space? There seems to be an assumption that new residents will find work within West of Ifield, or move to West of Ifield for employment, but this again shows a complete ignorance of human behaviour because a train driver isn’t going to move to WOI and switch to a job in ‘financial services’ any more than a [REDACTED] administrator will decide to move to WOI if their employer decides to lease an office there. People will be travelling out and in (should any commercial space actually be taken on by real life wealth generating businesses), by car, for work using roads that are already operating well beyond capacity at peak times. That’s what people do, out in the real world!

Section 7.2 (figure 222) shows a ‘Health Centre’ and ‘Leisure Centre’, both of which appear to be the approximate size of a penalty area. I would also invite the applicant to demonstrate how these facilities will be operated; have the Local Health Authority confirmed that they will be staffing a health centre and will the applicant or a private company be operating the leisure centre? If a private company, is one contracted to operate it already? I would similarly enquire as to whether contracts have been exchanged with a retailer to take the lease on the proposed food store. These are, of

course, rhetorical questions because this element of the DAS is merely paying lip service to the idea of these facilities in order to make the proposal look more attractive when, the reality is likely to be, that none of this will happen, as we've seen in other large scale developments locally.

Section 7.2.2 (Access & Movement paragraph 5) confirms that Rusper Road will be closed to through traffic between Ifield & Rusper. Who does the applicant think they are? What level of self-importance makes them believe they have the right to close a centuries old route linking Rusper to Ifield & Crawley? Many people on the Ifield side of the closure live in the Parish of Rusper, so closing this route is to deny us efficient vehicular access to our school, church, polling station and other Parish facilities. Many people on this side of Crawley also use the route to access other villages to the west of Crawley, as well as Horsham, to avoid the gridlock experienced in Gossops Green, Bewbush and, particularly, around Ifield Station at busy times of day.

It beggars belief that somebody has been (presumably well) paid to devise the proposed detour to Rusper through the Ifield Conservation Area and it is clear that they have no understanding of this area whatsoever. It's gross incompetence on their part. If the decision makers at HDC illogically decide to approve this planning application in order to protect the votes of their Councillors in the more populous areas of the District then they **must** stipulate that this route remains open for through traffic, be that by way of a light controlled junction that prevents the movement of vehicles from the CWMMC to Rusper Road (and vice versa) of the like seen at Meath Green (Reigate & Banstead) or at Broadbridge Heath, a bridge or an underpass. Closing the through route is not an option worthy of consideration.

For someone who makes a daily journey to Rusper, a 10 minute addition to each journey equates to 2 hours a week (let's say we have Sunday off!), which is 100 hours (4 days) a year or, in a ten year period, over a month of life wasted sitting in a car making an unnecessary detour on the whim of an incompetent 'Masterplanner' who is completely out of their depth.

Section 7.2.4 (figure 227) I know it's a subjective thing, but if these images are representative of what the proposed residential units will look like then the application should be refused on that basis alone. They look horrendous and resemble the worst of the 1960s built inner city sink estates.

Section 7.3.4 (paragraph 1) The neighbouring area is Ifield West, not West Ifield. Further evidence of ignorance of the local area and an inability to use freely available resources to ensure accuracy.

Section 7.4.3 (un-labelled images) See my observations on section 7.2.4 (figure 227).

Section 7.4.4 (bullet point 5) I'd like it to go on record how grateful the local community are that the applicant is providing 'a generous amenity greenspace' in the middle of the 1960's style ghetto.

Section 7.5.2 (Access & Movement bullet point 2) appears to stop short without concluding. A 'visually pleasing' what?

Section 7.5.3 (co-location, feature 8) Could the applicant clarify what a 'Shared Good-lift' is please. Hopefully it's not a lift that is bad...

Section 7.5.6 (Stewardship body) This whole piece feels like an abdication of responsibility on the part of the applicant. An effort to 'jazz up' the application with lots of shiny new things, but then to abandon them and pass the upkeep responsibilities to other

bodies or residents. One trusts that the Planning Officers will read between the lines here and in similar sections.

Section 8.3.1 (3rd page, ‘Development of the CWMMC’ section, final bullet point at the foot of the middle column) mentions that the development will accommodate electric scooters, which are illegal to use on public roads and pavements, so it’s interesting to note that the applicant, a government body, are promoting illegality.

Section 8.3.1 (3rd page, ‘Development of the CWMMC’ section, first bullet point at the top of the right column) says that the CWMMC will “*provide routes that allow for easy access to other employment centres and the wider area*” which flies in the face of other claims that everyone will either work on site or get buses when, in reality (and as this “whoopsie, shouldn’t have said that” comment confirms) people will use their cars to travel, and they will travel straight out into the already evident and frustrating traffic jams adding to the poor air quality already experienced by the area.

Section 8.3.4 (paragraph 5) says that construction traffic entering via Rusper Road (and Tangmere Road, Overdene Drive and Gossops Drive) provides a ‘practical solution’, but it’s far from practical to have construction traffic coming along those roads. By deeming this route to be practical, the applicant once again demonstrates that they have not spent any time getting to know the area before preparing their plan. Rusper Road is incredibly narrow between Tangmere Road and The Millbank, with buses struggling to pass one another without mounting the narrow pathways, pathways which are used by many children walking to and from The Mill Primary School and ICC. In addition, the area around the Ifield Drive/Overdene Drive junction is gridlocked for half an hour at the start and end of each school day. Construction traffic using this route would present an immediate danger to local children and, should the decision makers at Horsham District Council take leave of their senses and grant permission for this quite unsuitable development, then they **must** stipulate that traffic enters the site from the northern end of the proposed CWMMC, i.e., the Charlwood Road end, in order to protect the lives of local children. Whilst this still isn’t a ‘practical solution’ - none of this proposal is practical, or indeed logical - it’s less impractical, and dangerous, than the current proposed route for construction traffic.

Section 8.5.1 (paragraph 1) says that the southern section of the CWMMC will have a 20mph speed limit, so returning to my comments on Section 7.2.2, not only will we have a 3 mile detour to access our Parish facilities, we will be subjected to a 20mph speed limit for part of the journey. (see also my comment on paragraph 4 of this section, below).

Section 8.5.1 (paragraph 3) makes provision “*to provide sufficient queuing capacity at the Charlwood Road Junction*”. Is this another ‘whoops’ inclusion? Surely everyone will be working on site or using buses and bikes to leave the site, if the other gumpf in the proposal is to be believed, so why will there be a need to provide ‘queuing capacity’ anywhere? Which is it, Homes England?

Section 8.5.1 (paragraph 4) states that “*Rusper Road will be stopped up either side (of the CWMMC)*”. This is contrary to what residents were told at the so-called consultation events and is also contrary to what is stated in Section 7.2.2. This begs the question, what **IS** the route to Rusper, and beyond, from Ifield & Crawley? The only remaining option, without fighting ones way through the proposed construction traffic horrors near Ifield Station to access via Gossops Green, Bewbush, the A264 and Faygate, is to use Ifield Wood, but this road is incredibly narrow and the tight bends become quite dangerous at peak times, when it is already used as an unsuitable rat run by people from the south and west accessing Gatwick who are trying to avoid the already horrendous traffic conditions in Crawley, conditions that will only be exacerbated by the proposed

WOI development. This is another reason that means it is critical that Rusper Road remains open for through traffic. As the CWMMC is part of the FULL application, then until this major contradiction in the application is resolved, HDC will not be able to consider granting permission for this development.

Section 8.5.1 (priority access junction paragraph) mentions a '*long term vision for the area*' which is clearly a further 7,000 homes, in line with the original proposal which will pretty much join Horsham with Crawley in one large suburban sprawl. If you grant permission for this, then an application for that will soon follow, just as night follows day.

Yours sincerely

[Redacted]