

THAKEHAM PARISH COUNCIL CONSULTATION COMMENTS

TO:	Horsham District Council – Planning Dept
SITE ADDRESS:	Land To The West of South Hill Farmhouse Storrington Road Thakeham Pulborough West Sussex RH20 3EN
PROPOSAL:	Erection of 5no. Detached dwellings with associated access, car ports and landscaping.
REFERENCE:	DC/25/0053
RECOMMENDATION:	STRONG OBJECTION
SUMMARY OF COMMENTS & RECOMMENDATION: Thakeham Parish Council (TPC) Strongly Objects. (Please see reasons listed below).	

MAIN COMMENTS:

Thakeham Parish Council (TPC) met and discussed the above application on 11.02.25.

TPC's **Strong Objection** as detailed for the first submission, DC/23/1777, still stands.

The Facilitating Appropriate Development (FAD) document gives the following points as material planning considerations:

a) the site adjoins the BUAB.

Yes and no, but the site lies on a prominent ridgeline location, visible from public footpaths over a wide area, and such housing would cause visual damage with a detrimental effect on the rural landscape.

Therefore, we contend that the site is outside the BUAB and the building line of relatively small houses along this stretch of the B2139. The linear layout north to south whilst the existing housing is more orientated east to west. The site projects into the countryside and the green space between Thakeham and West Chiltonington. This area is indeed a 'valued landscape' as per TNP Policy 10 and development here will be visible from the main footpath between the 2 villages. TPC disagree that it will have a 'negligible effect on the wider landscape' (6.42).

The proposal is for five very large houses which will be visible on the skyline to many areas of our parish. This would in no way be mitigated by a hedging buffer as the houses would be much higher than the hedges. It is not "a negligible effect on the wider landscape".

Section 6.8 of the Planning and Design and Access Statement refers to the need (NPPF) for 'the level of expansion to' be 'appropriate to the related settlement'. As mentioned above it exceeds the building line here and is not in keeping with the existing housing. It does not respond 'positively to the surrounding locality in careful consideration of form and design' (6.20).

This is a valued landscape (TNP Policy 10).

b) the level of expansion is appropriate to the related settlement

c) the proposal meets local housing needs

No to both b) and c). 5 bedroom houses are not in demand and are not part of Thakeham's assessed housing needs. They are suburban houses in a purely rural setting.

Flooding potential: the drive exiting the proposed development to the B2139 is to be tarmacked. It is a sloping drive. Water will cascade down it then run down the B2139 causing further erosion to the edges of the high banks to the south. This should be avoided at all costs.

Ecology:

The Hazel Dormouse Mitigation and Compensation Strategy, issued 14/03/24, is valid for 12 - 18 months, so is near expiry.

The Preliminary Ecological Appraisal (PEA), issued 25/01/23, with the one day only Field Survey 10/01/23 in the dormant season, valid for 12 - 18 months, has expired so is no longer valid.

It transpires that the on-site development at South Hill Farm cannot fully mitigate biodiversity damage. The applicant proposes off-setting with habitat works at Danefold Farm, West Grinstead, using the Biodiversity Impact Calculation (BIC) scheme.

BIC methodology requires the offset to be an equivalent area of habitat of the SAME distinctiveness or higher. We question whether the 2 sites, in distinct locations 10 miles apart, comply. Are hazel dormice present in the offset area of Danefold Farm? Hazel

dormice are endangered. Can we destroy one habitat where they are very likely to be and hope there are dormice in the 2nd site who would benefit? Similarly bats, South Hill Farm is within the Bat Sustenance Zone. Is Danefold Farm in a similar situation?

The proposed offsetting does not seem to have like-for-like correspondence.

Danefold Farm will need to be registered on the National Biodiversity Gains Site Register, No evidence submitted.

Who will monitor this offsetting? It is acknowledged in the report that the offsetting will produce a "likely" gain - there is much scope for failure resulting in no gain. Again, who monitors? The Ecology Co-op report estimates the offsetting to raise the gain to 12.14%, and HDC's Biodiversity Net Gains requires a minimum of 12%.

.14% is a very low margin of error!

Therefore the Parish Council does not see this as a satisfactory solution.

As the proposed site lies in a sensitive rural area, IF granted permission, the numerous ecological conditions specified should be strictly adhered to and monitored.

Water neutrality and water offsetting:

On Jan 21st, 2025, Lawrence Gosden, CEO of Southern Water, gave oral evidence to the House of Commons Environment, Food and Rural Affairs Committee.

Two salient points:

1. S.E. England is a water-stressed area. This part of the country receives less rainfall per capita than Namibia.
2. Water usage in the S.E. is around 144 litres per person per day.

This figure does not correlate with figures bandied about by various applicants.

Extracting water from an aquifer in one part of the county and transferring saving credits to another part of the county does not cause a net increase in the use of water previously supplied. However, if rainfall across the county remains the same over time (ignoring climate change effects), but the number of sources of ground aquifers and surface water extraction is increasing to cater for all these new homes, ground water aquifer and surface water sources will be adversely impacted.

The water offsetting scheme proposed with South Lodge Hotel is for 159 litres of water per day.

However, the granting of a licence to South Lodge is not certain.

Restrictions may be applied on water abstraction when levels are low, known as "Hands Off Levels".

The granting of a licence does not guarantee a constant supply of water.

These unknowns need to be known before approval could be given to the application.

Maintenance requirements on individuals, i.e. residents, for rainwater recycling systems are not mentioned. The applicant has not submitted details of the exact system and how to ensure maintenance regimes required are carried out in perpetuity.

A S106 agreement in perpetuity may be best to ensure that ongoing maintenance is actually carried out, including a 2-3 year monitoring period by an independent expert.

The applicant refers to the speed of traffic in the area from a survey in Dec 2022 (over 3 years ago) increase in traffic speed has undoubtedly changed since then and also greatly increased number wise. This was evidenced in an Independent traffic report commissioned by TPC in 2024 and previously submitted to HDC and WSCC.

Vision from the exit looking south may be just justifiable but definitely not looking north of fast moving traffic suddenly appearing round the blind bend.

The stating of a stepped bank going south being suitable for pedestrians is completely wrong and it is most definitely not as it is uneven, leaf covered and slipping into oncoming traffic is a huge possibility or tripping on fallen branches. Children etc wishing to catch buses from the Street would have to walk in the road!!

Finally there is no pathway for pedestrians wishing to connect to the Town House pathway as it is steep banked and on a blind bend.

In 7.2 the applicant states that the site is in a sustainable location. This cannot be when access to employment and services and facilities will be largely dependent on the car in the absence of meaningful public transport.

With regards to employment, no mention is made of TNP's policy on Soils. This area has long been used for horticulture and the soil on this ridge is of high quality and could contribute towards providing employment opportunities in the future.

Together with all the aforementioned issues, TPC still strongly objects to this application.

ANY RECOMMENDED CONDITIONS:

The duty lies with HDC to ensure that future residents are not compromised by scantily considered and incomplete schemes. Insufficient evidence has been provided.

NAME:	A.Brown (Parish Clerk)
DATE:	11.02.2025