

Rusper Parish Council Consultation Response:

DC/25/1120: Land Adjacent To Pucks Croft Cottage Horsham Road Rusper West Sussex

Outline application for the erection of 4no. dwellings, extension to existing cottage, alterations to access and provision of landscaping.

Summary:

Rusper Parish Council strongly objects to this application.

Rusper Parish Council [RPC] endorses the objections raised by J Bowyer BSc(Hons) MSc MRTPI an Inspector appointed by the Secretary of State in his appeal decision Appeal Ref: APP/Z3825/W/21/3280084, decision date: 21 July 2022. The key points of this are listed below and are still relevant to this new application.

We further endorse the decision of Horsham District Council [HDC] planning department in it's original rejection of the application Ref DC/20/2465, dated 4 December 2020, which was refused by notice dated 3 February 2021. Again, we highlight key points from that decision which are still relevant to the new application.

We also support the objections raised by local residents.

In the event that the officers are minded to propose the acceptance of this application, Rusper Parish Council would ask for it to go to full committee.

Key Points From Planning Inspectorate

Please see the Appeal Decision Notice

(https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=D055937D7A3B4D92BFC1213A69D9F9C1) for full details. Despite the reduced number of

dwellings, this new proposal would still have the impacts referenced by the inspector.

In terms of "Suitability of the Location", the Inspector concluded that despite HDC being unable to demonstrate a five year supply of housing:

12. Nevertheless, the location of the majority of the development within the countryside would conflict with the spatial strategy for the District and Policies 2, 3, 4 and 26 of the HDPF, and I conclude on this basis that it would not therefore be a suitable location for housing.

In terms of "Character and Appearance", the inspector concluded:

21. As a consequence, there would be conflict with policies 25, 32 and 33 of the HDPF which together and amongst other things broadly seek to conserve and enhance landscape character and the natural environment, and require new development to be of high quality design that complements local character and contributes to a sense of place.

Key Points From HDC Planning Department

1 The proposed development is located in the countryside, outside of any defined built-up area boundary, on a site not allocated for development within the Horsham District Planning Framework

or a 'made' Neighbourhood Plan. This proposed development would be contrary to the overarching strategy and hierarchy approach of concentrating development within the main settlements. Furthermore, the proposed development is not essential to its countryside location. Consequently, it represents unsustainable development contrary to Policies 1, 2, 3, 4, and 26 of the Horsham District Planning Framework (2015).

2 The proposed development would result in a quantum and density that would surmount to overdevelopment of the site, in a layout and arrangement that would formalise and suburbanise the countryside setting. The proposal would be unrepresentative of the build pattern and character of the locality and would not protect, and/or conserve, and/or enhance the key features and characteristics of the landscape character area. The proposed development would therefore result in harm to the visual amenity and countryside setting of the wider surroundings, contrary to Policies 25, 32, and 33 of the Horsham District Planning Framework (2015).

3 Insufficient information has been provided to demonstrate that the existing access would provide the necessary maximum visibility splays to ensure that safe and suitable access is provided and conflict between traffic, cyclists and pedestrians is minimised. The proposal is therefore contrary to Policy 40 of the Horsham District Planning Framework (2015).

See https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A3784463662F11EB8103005056B22DDB for full text.

Additional Important Planning Points From RPC

The concerns in the HDC Arboricultural Officer report show that at the very least the information on the application needs updating and even then the application in its current form should be refused because of the impact on significant trees. The minimum clearance for tree roots, especially in relation to unit 5, doesn't meet the requirements to protect off site trees and at the very least this unit would need to move.

The source of the River Mole starts close to this site and an underground stream flows under the site, yet no consideration seems to have been given to both the long term impacts of development on this site, or to possible pollution being disturbed during development.

The Transport Statement is based on false information.

It suggests (Para 3.2) that "*The site benefits from close proximity to the A24 to the west and the A264 to the south.*", but the truth is that there are no A or B roads within 2.6 miles of the site. The only access to the A24 (3.7 miles) and A264 (2.6 miles) is via narrow twisting country lanes (Class C roads).

It suggests (Para 3.10) that "The stops are served by the 52 bus service providing a single daily service in each direction (Monday – Thursday) between Horsham and Broadbridge Heath Tesco", but this is not a daily service between Monday through to Thursday as suggested by the text, but provides only a brief opportunity to visit Horsham, or Tesco two days a week on Monday and Thursday. There is no daily bus service that could be considered useful for most peoples needs to get to and from work or other facilities.

The suggestion (Para 3.8) that PRow's provide safe access to services outside the village is completely invalid. There is no connected PRow route from the site to any regular bus service, or amenity outside the village, without including narrow country lanes with no footway.

WSCC Highways in their response, do not seem to have considered the on-site road layout, or whether the new access road would be adopted or not. The proposal shows the on-site road to be

only 4.1m, well below the nationally recommended standard of 6m, see the government's "Street Type Description" (https://assets.publishing.service.gov.uk/media/6270d483e90e0746c93a4298/EDG_Street_Type_Description_CHECKED.pdf) where Type G for a Mews Court seems the most appropriate and it specifies:

"The minimum width should be 6m. A manoeuvring space of 6m is required to facilitate egress from domestic parking spaces. The target driver speed is maximum 10mph and this should be enforced with speed-restraint design. This street type may take access from an existing county route and a type A, B, D or E street. The design of a junction with an existing county route should be in accordance with the requirements of the Highway Authority."

Clearly, turning space exists within the proposed layout, but there seems to have been no consideration of possible congestion for traffic trying to enter from the busy Horsham Road, while other traffic may be trying to exit the site. The Highways report makes no reference to the design of the junction, beyond the mention of visibility splays, so it is unclear if they have considered the proposed design against the West Sussex requirements. Presumably this would be considered as part of a Section 278 Agreement, but given the other issues with the design it seems that this should be part of the initial consideration as the whole layout could be thrown into turmoil to meet the requirements of such an agreement.

There is lack of visitor parking, there seems to be only one visitor space allocated for the whole site and this could lead to overflow parking on the Horsham Road.

The waste and surface water management plans are questionable and need further study, but there is no response from Thames Water who are responsible for this.

The proposal makes brief reference to rainwater harvesting (p 13 of the DAS) but their supporting statement provides no details on how this will be achieved - only a picture of a water butt. Similarly, p 25 of the Planning Statement also refers to rainwater harvesting but there is nothing substantial in the document to suggest how this will be achieved.

Southern Water seem to be confused in their response. Whilst they are not responsible for waste water, this site will be supplied by Southern Water, with the resultant additional impact on the Arun Valley extraction sites and wildlife impacts. They should be informed of their mistake.

The Water Neutrality Statement, all 117 pages of it, needs to be considered with more than a pinch of salt. Firstly, as the existing property has been in the current ownership for more than 3 years, we must assume that they have actual water usage data for that time, which would provide a better start point for their calculations. The basis of their argument for the four new builds is to use as a starting point the 'common' bench mark that doing everything possible, one can restrict overall usage to 85 litres/person/day. (Note that even the water companies think it will only reduce to 110 litres/person/day by 2038.). But the analysis then goes on to suggest that at Pucks Croft it can be reduced to 79.91 litres.

Most importantly, what all of their calculations fail to take into account is that the water supply comes from the Arun Valley via the Southern Water network, but all waste water goes out to the Thames Valley via Thames Water. This means that all water usage on the site is a net drain on the Arun Valley and a direct impact on the Arun Valley SPA, SAC and Ramsar Site. Additionally this means that all waste water from the site will create an increase of flood risk along the river Mole, where it eventually drains. All of the basic calculation tools work on the assumption that waste water runs off to the same system as the supply water, but in this area it is clearly not the case.

This site was considered as part of the Rusper Neighbourhood and rejected. It was assessed against

the formal planning criteria as outlined by the planning inspectorate. The conclusion of the assessment was:

This is a green field site and fails some important sustainability issues.

It is on an undesignated country lane outside of the built up area on land currently designated as agricultural and used for grazing.

It is more than 2.5 miles from the nearest regular bus service along country lanes with no footpaths.

There is no identified need from the Housing Needs Assessment for this development. It was considered for the HDC 2018 SHELAA report as possible for future development in 11+ years. It could be considered for development in the future, if a real need arises.

The housing need in Rusper has been more than met by the 2 recent developments in Ifield and the strategic sites at Mowbray (North Horsham) and Kilnwood Vale. Additionally, three sites adjoining the current built boundary of the village have recently been granted planning permission that will lead to 9 new dwellings in East Street and 43 at Millfields. This latest proposal would be a significant over-development of the area and seriously impact the rural nature of a country village.