

Rusper Parish Council

Response to Planning Application:

DC/25/0523

Erection of 18no. 2, 3 and 4 bedroom dwellings, (including 6no. affordable housing units), together with access from East Street, vehicle and cycle parking, landscaping and open space, and sustainable drainage.

Land North of East Street Rusper West Sussex

Rusper Parish Council Strongly Objects to this proposal.

The proposed development is not any area that was put forward for the recently made Rusper Neighbourhood Plan and there was no local consultation before this site was added as a proposed site for the new HDC Local Plan, which has been rejected by the Planning Inspector, because of the lack of consultation. The application makes several references to the emerging Local Plan, but this has now been rejected and needs to be redrawn following the initial examination. Note that the inspector specifically referenced the failure to consult and the problems with the allocated sites against the spacial policies of the plan as reasons for its rejection, both of which reflect badly on this application.

The site fails the spacial policies of both the current HDPF and the stalled proposed Horsham Local Plan. It is outside of any built boundary and despite being adjacent to the current boundary, it fails to provide any pedestrian access to the local village, without walking along a road with no pavements. It fails all 12 Spacial Objectives of the current HDPF, as this is a green field site, outside the built boundary of a small village settlement with no daily public transport, in a rural setting.

The only access to the village shop, playground and church, will require stepping into a road with no pavement and where traffic drives directly into the setting sun at key points of the day, which renders them blind to pedestrians. The Site Access Arrangement, ITB200340-GA-002, REV C, clearly shows a 2m wide footpath, as the only pedestrian access to the site, exiting directly onto the narrow lane of East Street with no further pavement access. Additionally, the proposed vehicle entrance is directly opposite the already agreed entrance for the development opposite in East Street (DC/21/2172) and between the new entrances for Longfield House and the significant Millfields development (DC/24/0699), all of which represent an unacceptable impact on highway safety, and significant cumulative impact on the road network, contrary to paragraph 116 of the NPPF. The NPPF paragraph 117 specifically states:

117. Within this context, applications for development should: (a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

which this development clearly fails to do.

Divine Homes argues that Horsham's inability to demonstrate a five year land supply is due to a lack of available sites, where the real case is that more than enough sites have been put forward, reference the failed submitted Local Plan, but the problem is the ability to build these given the current water restrictions. Indeed the site at North Horsham, approximately 500 of which would be in Rusper Parish, is currently on hold because of this issue.

The Divine Homes Planning Statement (paragraph) references the HDC FAD, but incorrectly implies that **all** the requirements are met for this application. The actual FAD states:

Policy 4 - Strategic Policy: Settlement Expansion

The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;

- 1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge. - This site is not in the current HDPE, or the Rusper Neighbourhood Plan*
- 2. The level of expansion is appropriate to the scale and function of the settlement type. - Rusper parish already has allocations that will more than double the current housing stock, including extensive development opposite this site.*
- 3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services. - The current housing need with Rusper parish is already more than met by existing allocations.*
- 4. The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; - The implications of this proposal, especially in relation to road traffic, for other developments in the area could be significant.*
and
- 5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced. - This site is not within an existing boundary and would significantly impact the landscape features of the rural setting.*

The site of 18 dwellings proposes only 4 visitor parking bays. The nearest car park is the village car park next to the church, some distance from the site, but with no pavement to connect to the proposed development. This will lead to overflow parking along the narrow country lane of East Street and an increased hazard for all road users.

The proposal has no facilities on site for play or other activities, so all of this will require residents to walk up to the village, again with no pavement to connect them.

The Planning Statement (para.2.5), mentions the number 52 bus service, but fails to point out that this is the only public bus service for the village and that it only runs twice a week. This means that there is effectively no regular bus service for the area.

The proposal references nearby footpaths (1496 & 1501), but there is no way for residents to connect to these paths without walking along a dangerous road. It highlights the bus stops in the village, but fails to note that the bus service only runs two days a week and allows for a brief 2 hour stay in Horsham before returning.

The proposal references distant Special Areas of Conservation (SACs) and Local Wildlife Sites (LWS), but fails to mention the 4 Sites of Special Scientific Interest (SSSIs) which lie within 2.5km of the site.

The proposal makes no mention of the 22m of hedge and more than 12 significant trees that were removed, without permission (see attached photographs), prior to the application being submitted. Indeed these are completely omitted from the Biodiversity Net Gain Report, calling into serious question the validity of this report. Despite this the report still indicates **a net loss of habitat units**. The Planning Statement also says (paragraph 6.42) that "It is envisaged that the securing of off-site habitat units would be evidenced to the Council by way of condition.", yet this was not done before removing the hedge and trees. The hedgerow and trees have subsequently been protected by a TPO (TPO No. TPO/1579), so any further development of this site will need to protect those trees.

The Energy and Sustainability Statement is vague and fails to indicate which measures will be incorporated. This document has no detail of the actual construction just a list of what could be done. For example, para (c) on page 4 states: The objectives of this Energy and Sustainability Statement are to outline the possible measure that can be incorporated into the development during detailed design.....”

The Transport Statement, is also vague and talks about access to existing footways:

3.2.2 On the northern side of East Street, the footway fluctuates in width but is typically 1.4m wide although there are sections where the footway narrows to approximately 1.0m wide further to the west, which is sufficient to accommodate a wheelchair or pushchair. The footway on the southern side of the carriageway is a minimum of 1.2m wide which is sufficient for two pedestrians to pass each other without needing to step into the carriageway.

3.2.3 The footways continue to the west providing access into Rusper Village where the main local facilities and bus stops are situated. These facilities continue onto Horsham Road to the south providing a connection to Rusper Primary School

and

7.5 A separate pedestrian access will be provided in the south-west corner of the site. There is the opportunity to provide a kerb build out on the northern side of East Street opposite the proposed separate pedestrian access with an associated priority working which may offer wider benefit in terms of reducing vehicle speeds in the village. The applicant would like to discuss with WSCC delivering this kerb build out as part of the access works.

However the existing footways stop far short of the proposed pedestrian access to the site on both the north and south sides of East Street, meaning that pedestrians would need to walk in the road to access the existing paths. We would request that WSCC Highways do an on site assessment of the current situation and the proposals set out. Ideally this would include a period near to sunset, so that they can experience the blinding effect of a low sun at this point of the road.

The Divine Homes Planning Statement also says (paragraph 6.31) "*6.31 Although not required to achieve safe pedestrian and vehicular access to the Site*". This is clearly not true as without safe access the application should be refused.

RPC strongly believes that there would be an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe.

Despite acknowledging that the policy requirement for affordable housing is 35% (Planning Statement para 6.26) the proposal is to only offer 33.3%. Additionally, despite 14 mentions of affordable housing in the document, there is no indication of how this will be provided.

The application specifically states "... landscaping and open space, ...", but we can see no evidence of open space, apart from around the SUDS pond on the south-east corner of the site, which would not constitute public open space.

In terms of water neutrality the proposal relies on a legal agreement with Slade Farm, Rogate (near Petersfield), but is not clear that any surplus from that borehole will be provided to Southern Water, which could mean that this development would still impact the Arun Valley extraction. The legal in perpetuity agreement would need to be ratified by Southern Water and HDC before any development could commence on this site.

This development is opposite several new developments that have permission with access onto East Street and would create a significant cumulative impact on the character of the village and the traffic flow in East Street specifically. They are:

DC/21/2172 - Erection of 6 No. 3-bed dwellings (including 1 No. retirement property), creation of an access drive and landscaping works (Resubmission of DC/20/2454)

Land South of East Street Rusper West Sussex

The proposed access road for these 6 dwellings is directly opposite the proposed entrance for this proposal. There has been no discussion about how priorities would be managed.

DC/14/0413 See also DC/23/0069 and DC/24/1144

DC/24/1300 - Erection of 2No. detached self-build dwellings with car parking. Relocation of an approved access and retention of existing access.

Former Longfield House East Street Rusper West Sussex RH12 4RB

The proposed development shows the footway exiting directly onto the road, between the two access roads for the Longfield House development opposite, thus greatly increasing the risk for pedestrian traffic with no pavement along the road.

DC/24/0699 - Demolition of existing structures and erection of 43no. dwellings (Use Class C3), creation of a new access and provision of public open space, alongside associated landscaping and other works.

Millfields Farm Horsham Road Rusper West Sussex RH12 4PR

Photographs of removed trees and hedgerow:

Before:



After:

