Rusper Parish Council
c/o Rusper Village Stores
High Street
Rusper
RH12 4PX
Tuesday 25th June 2024

Appeal Refs: APP/Z3825/W/24/3341956 and APP/Z3825/W/24/3341965

HDC Planning Refs: DC/24/0033 and DC/24/0036 and including DC/24/0034, DC/24/0037 and DC/24/0038

Dear Sirs,

Rusper Parish Council has very strong objections to these applications as detailed in our various responses included below as Appendix 1 and Appendix 2.

In terms of the appeal process we would seek assurance that each application is not considered in isolation. We feel that the applicant is clearly trying to bypass the planning process by splitting the proposals for this site into multiple applications and claiming that each individually is for less than 6 dwellings: whereas, the reality is that this site is being put forward for at least 10 dwellings in an isolated rural setting with no public transport.

Rusper Parish Council (RPC) indicated a number of clear planning reasons in our responses (see below) that helped inform Horsham District Council's refusal to these applications. RPC feels strongly that any of the applications individually are inappropriate for this isolated location and have special concerns about any development interspersed with working farm buildings and the potential risks to human health and the impact on the everyday working of the farm.

Yours faithfully

Rusper Parish Council

Appendix 1

Rusper Parish Council:
Response to planning applications DC/24/0033 and DC/24/0036 and including DC/24/0034, DC/24/0037 and DC/24/0038

Rusper Parish Council Strongly Objects to all of these applications.
The Parish Council further points out that as these applications are for a linked development on the same site by the same applicant they should be considered as a single application in planning terms.

In the event that the officers are minded to propose the acceptance of any of these applications, Rusper Parish Council would ask for it to go to full committee and that the Parish Council is allowed to speak to their objections at the meeting.

These applications are a resubmission of the applications for prior approval that were submitted in 2023 and were refused (DC/23/1839 and DC/23/1840). Rusper Parish Council's objections to those applications still hold for the new full applications.

The overall impact of the two applications DC/24/0033 and DC/24/0036 would be to create a new settlement of ten new dwellings away from any existing developed area and amenities and not serviced by any public transport. The access to the location from a narrow country road becomes even more of an issue when the two applications are considered together.

Rusper Parish Council also supports the serious concerns expressed by the WSCC Access Ranger regarding the impact on the public footpath that runs through this development.

Additionally, the buildings have been, and according to the supporting statement still are, in use to support a working farm. It is hard to see how a residential development of this scale would be a safe environment mixed as it is within working farm buildings. Additionally, it would bring into question the viability of the farm when these buildings are taken out of use.

The revised applications fail to address any of the key points raised previously and make no reference to any water neutrality measures.

All of the applications (DC/24/0033 and DC/24/0036 along with DC/24/0034, DC/24/0037 and DC/24/0038) when considered together as representing development on the same site by the same applicant, represent an abuse of planning regulations. The arguments put forward in the supporting statements that accompany both applications rely on the assumption that the planning authorities will ignore the fact that the combined proposal for development of this site would result in twelve new dwellings and thus fall well outside the guidance for “Permitted development”.

DC/24/0033

Prior Notification for Change of Use of Agricultural Building to 5no. Dwellinghouses (C3 Use class).
Stumbleholme Farm Rusper Road Ifield West Sussex RH11 0LQ

Rusper Parish Council Strongly Objects to this application.

The site fails to meet the NPPF guidance for sustainable development. This site is in a rural location with no bus service and access to the wider road network is via narrow country lanes with no footpath, or cycleways. It is away from any built boundary and over 2 miles from the nearest shops

and services.

The location of the existing barns is down a narrow farm track that exits onto the nearest public road between sharp bends. The road exits to a narrow country lane with no street lighting.

Despite the reference to recent government statements made in the supporting statement, Rusper Parish Council strongly believe that these considerations make it impractical or undesirable to change the use of this site to housing.

The Transport Statement says:

> *- as regards transport implications / assessment the proposed development is likely to lead to a net reduction in vehicle movements when comparing the existing use to the proposed use. No transport mitigation impacts required.*

This seems to be unjustified. It is hard to believe that five new housing units, each with at least two car parking bays, in an area with no public transport, or safe cycling routes, will not generate at least 20 vehicle movements a day, virtually every day of the year.

Currently farm vehicles are rarely seen exiting or entering the site and even at peak farming times during preparation and harvest, numbers that high are unlikely. It is hard to believe that the current farm use would generate over 7,000 vehicle movements a year.

The entry/exit for this site onto the narrow country lane that is Rusper Road, between two bends on a section of road prone to frequent flooding, is not an acceptable option to support this many new dwellings. See images below from Google Street View.





The Contamination Statement says:

> *- On the basis that it is confirmed that the barn has only been previously used for the keeping of livestock, storage of hay, feed and agricultural plant there would be no contamination issues arising. No remediation measures proposed or required. No further work is required relating to ground conditions / contamination at the site, for its proposed conversion.*

There is some concern that the storage of agricultural plant could lead to contamination and this should be checked.

In terms of flooding the main concern would be that the current section of road, where this site exits, is prone to frequent heavy flooding and this would additionally impact the safety of vehicles entering and exiting the site on a daily basis. It is noted that Barn B in this application is close to the River Mole, and looking at maps we believe it's flood risk zone 2 at that point.

The proximity to the river means that their waste water will probably discharge directly into the river after treatment via a septic tank, but it will not benefit from the additional removal of pollutants by vegetation and micro-organisms from flowing through ditches and soil. This gives the Parish Council concerns about possible river pollution.

The proposal makes no reference to water usage, or climate impact mitigation. Rusper Parish Council would expect that development in such a rural location would provide significant rain water

capture and filtering to reduce the impact on the main water supply. In fact the current Environmental Emergency in the Arun Valley would prohibit any development in this area at this time. Additionally, no mention of solar panels or other renewable energy options is made and the Parish Council would expect this for such a development.

This application should be considered as a single application with DC/24/0036 and the overall impacts used to determine the planning criteria that should be applied.

In advance of any decision on the application, in line with the applicant's request, Rusper Parish Council would appreciate being involved in any discussions with the applicant and their agent.

DC/24/0036

Prior Notification for Change of Use of Agricultural Building to no 5 dwellinghouses.
Stumbleholme Farm Rusper Road Ifield West Sussex RH11 0LQ

Rusper Parish Council Strongly Objects to this application.

The site fails to meet the NPPF guidance for sustainable development and all of our objections for DC/24/0033 apply to this applications.

Additionally, there seems to be a lot of contradiction between this application and DC/24/0034 Prior Notification for demolition of existing agricultural barn. DC/24/0036 is for the conversion of two barns and the application documents include a structural report that says the base structure of the barns is sound. DC/24/0034 indicates the same two barns on the location diagram and the supporting statement describes the complete demolition of both structures.

Appendix 2

Rusper Parish Council:
Response to planning applications DC/23/1839 and DC/23/1840

Rusper Parish Council Strongly Objects to both of these applications.
The Parish Council further points out that as these applications are for a linked development on the same site by the same applicant they should be considered as a single application in planning terms.
In the event that the officers are minded to propose the acceptance of either application, Rusper Parish Council would ask for it to go to full committee and that the Parish Council is allowed to speak to their objections at the meeting.

DC/23/1839
Prior Notification for Change of Use of 2No Agricultural Buildings to 5No dwellinghouses (C3 Use class).
Stumbleholme Farm Rusper Road Ifield West Sussex RH11 0LQ

Rusper Parish Council Strongly Objects to this application.

The site fails to meet the NPPF guidance for sustainable development. This site is in a rural location with no bus service and access to the wider road network is via narrow country lanes with not footpath, or cycleways. It is away from any built boundary and over 2 miles from the nearest shops and services.

The location of the existing barns is down a narrow farm track that exits onto the nearest public road between sharp bends. The road it exits to is a narrow country lane with no street lighting.

Despite the reference to recent government statements made in the supporting statement, Rusper Parish Council strongly believe that these considerations make it impractical or undesirable to change use to housing for this site.

The Transport Statement says:
- as regards transport implications / assessment the proposed development is likely to lead to a net reduction in vehicle movements when comparing the existing use to the proposed use. No transport mitigation impacts required.

This seems to be unjustified. It is hard to believe that five new housing units, each with at least two car parking bays, in an area with no public transport, or safe cycling routes, will not generate at least 20 vehicle movements a day, virtually every day of the year.

Currently farm vehicles are rarely seen exiting or entering the site and even at peak farming times during preparation and harvest, numbers that high are unlikely. It is hard to believe that the current farm use would generate over 7,000 vehicle movements a year.

The entry/exit for this site onto the narrow country lane that is Rusper Road, between two bends on a section of road prone to frequent flooding, is not an acceptable option to support this many new dwellings. See images below from Google Street View.





The Contamination Statement says:
- On the basis that it is confirmed that the barn has only been previously used for the keeping of livestock, storage of hay, feed and agricultural plant there would be no contamination issues arising. No remediation measures proposed or required. No further work is required relating to ground conditions / contamination at the site, for its proposed conversion.

There is some concern that the storage of agricultural plant could lead to contamination and this should be checked.

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The proximity to the river means that their waste water will probably discharge directly into the river after treatment via a septic tank, but it will not benefit from the additional removal of pollutants by vegetation and micro-organisms from flowing through ditches and soil. This gives the Parish Council concerns about possible river pollution.

The proposal makes no reference to water usage, or climate impact mitigation. Rusper Parish Council would expect that development in such a rural location would provide significant rain water capture and filtering to reduce the impact on the main water supply. In fact the current Environmental Emergency in the Arun Valley would prohibit any development in this area at this time. Additionally, no mention of solar panels or other renewable energy options is made and the Parish Council would expect this for such a development.

This application should be considered as a single application with DC/23/1840 and the overall impacts used to determine the planning criteria that should be applied.

In advance of any decision on the application, in line with the applicants request, Rusper Parish Council would appreciate being involved in any discussions with the applicant and their agent.

DC/23/1840
Prior Notification for Change of Use of Agricultural Building to 5no. dwellinghouses (C3 Use class).
Stumbleholme Farm Rusper Road Ifield West Sussex RH11 0LQ

Rusper Parish Council Strongly Objects to this application.

The site fails to meet the NPPF guidance for sustainable development and all of our objections for DC/23/1839 apply to this applications.

The overall impact of the two applications DC/23/1839 and DC/23/1840 would be to create a new settlement of twelve new dwellings away from any existing developed area and amenities and not serviced by any public transport. The access to the location from a narrow country road becomes

even more of an issue when the two applications are considered together.

Additionally, the buildings have been, and according to the supporting statement still are, in use to support a working farm. It is hard to see how a residential development of this scale would be a safe environment mixed as it is within working farm buildings. Additionally, it would bring into question the viability of the farm when these buildings are taken out of use.

The two applications (DC/23/1839 and DC/23/1840) when considered together as representing development on the same site by the same applicant, represent an abuse of planning regulations. The arguments put forward in the supporting statements that accompany both applications rely on the assumption that the planning authorities will ignore the fact that the combined proposal for development of this site would result in twelve new dwellings and thus fall well outside the guidance for “Permitted development”.