From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 23 June 2025 09:43:36 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DISC/25/0157
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 23/06/2025 9:43 AM.

Application Summary

Address:	Duckmoor Farm Wooddale Lane Billingshurst West Sussex RH14 9DZ
Proposal:	Approval of details reserved by condition 5 (Construction Environmental Management Plan) to approved appliation DC/20/2607 (83 residential units, landscaping, access, parking and associated infrastructure)
Case Officer:	Matthew Porter

Click for further information

Customer Details

Address:	12, Dadswell Drive BILLINGSHURST

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Loss of General Amenity - Other - Overdevelopment - Privacy Light and Noise - Trees and Landscaping

Comments:

I strongly object to the use of Dadswell Drive as a construction access route for the Duckmoor development. This route is wholly inappropriate, unsafe, procedurally flawed, and legally challengeable. There is only one safe, viable, and justifiable construction access point: Wooddale Lane.

To grant access via Dadswell Drive would be an abomination of a decision aside from any technical, practical or legal reasons. Granting access via Wooddale Lane is not only the morally right thing to do it is also legally the correct thing to do. Whilst it was always fait au complit the developer and planning department would permit passage for the development, despite the comments of various councillors that the developer works closely with the public over their concerns, we now see the truth and the developer couldn't give a damn about the actual genuine concerns over residents and the significant harm and impact this will have upon them; they simply want the easiest, cheapest and least considerate option. They haven't even assessed the alternative option. It's shameful and shows a total lack of respect for the residents of Dadswell Drive and the planning process.

Approval of Dadswell Drive would expose residents to unacceptable risk, contradict planning guidance, and rest on advice from West Sussex Highways that is, demonstrably, incomplete, technically inadequate, and professionally negligent.

1. West Sussex Highways: Procedural Failure and Negligence

West Sussex County Council Highways (WSH), as a statutory consultee, has failed in its duty to provide sound, evidence-based guidance. Their response:

Confirms no site visit was undertaken: this is a dereliction of basic due diligence in a case involving HGV traffic through a residential area.

Only assesses Option 2 (Dadswell Drive) and omits entirely any evaluation of Option 1 (Wooddale Lane) despite it being the demonstrably safer and more logical access point.

It fails to apply highway engineering standards relevant to construction access, fire safety, or HGV movements.

This amounts to a clear failure to discharge their statutory consultee obligations. A separate letter of formal complaint has been submitted to West Sussex Highways highlighting their procedural and technical failings.

Legal and Technical Standards have been Ignored:

Manual for Streets establishes that 5.5m is the minimum carriageway width required for safe two-way flow on estate roads.

Building Regulations Part B5 mandates 3.7m of unobstructed width for fire appliance access. Any average standard day would show this is regularly breached.

Dadswell Drive is measured at 4.8m to 5.2m, with kerbside parking and regular pedestrian use.

These widths are functionally inadequate to support simultaneous HGV access and emergency response access without obstruction.

We have pregnant women, eldery people, pensioners and children in the cul de sac that rely on the need for these vehicles without obstruction or impact.

The omission of any swept path analysis, forward visibility assessment, or vehicle turning diagrams by either the applicant or the Highways Authority renders the recommendation procedurally unsound and professionally indefensible let alone morally indefensible.

2. Road Width and Safety Conflicts - Dadswell Drive is Unfit

On-street parking along Dadswell Drive reduces the usable road width to well below functional minimums.

Construction HGVs will conflict with resident cars, service vehicles, school traffic, and waste collection.

There is no space for vehicles to pass each other safely, and no turning head is indicated.

Emergency access may be compromised, violating both planning policy and Building Regulations.

In contrast, Wooddale Lane is a non-residential road with wider verges, fewer traffic movements, and is inherently more suited to short-term construction access.

3. Omission of a Comparative Route Assessment - Clear Bias Toward Developer

The developer's CEMP identifies Option 2 (Dadswell Drive) as "preferable" without justification.

No formal reason is provided for excluding Option 1 (Wooddale Lane), and no technical constraints are cited.

West Sussex Highways did not request a comparison, and the LPA has not insisted on one. Its embarrassing for West Sussex Highways.

This reflects a systemic bias towards developer convenience at the expense of public safety and operational reality. It undermines NPPF Paragraph 110(b), which requires that "safe and suitable access to the site can be achieved for all users."

4. Pollution, Dust, Lighting and Ecological Impact - Underassessed

No baseline PM10/NOx data or thresholds included in the CEMP.

No dust suppression contingency plan for increased traffic volumes.

4.2m LED floodlights proposed from 7:30am to 6pm could disturb bat activity and residential amenity.

No lighting layout or ecological impact plan submitted as required under Condition 5(vii).

Ecology advisers have already rejected the biodiversity section of the CEMP.

5. Community Consultation Was Misleading and Inadequate

Residents were not told during consultation that Dadswell Drive would be used.

A leaflet drop does not constitute meaningful engagement.

No risk, safety, or traffic assessments were shared with affected residents.

This is not only a breach of Horsham's Statement of Community Involvement but raises serious concerns under planning fairness principles.

6. Monitoring and Enforcement Mechanisms Are Unfit for Purpose

Oversight is delegated to an unnamed "responsible person."

There is no third-party compliance audit.

There are no enforcement triggers, no escalation protocols, and no trustable mitigation guarantee.

This renders the CEMP unenforceable in real-world conditions.

In conclusion: Approval Would Be Unsound and Potentially Unlawful

The CEMP as submitted relies on:

A flawed highways consultation

Unassessed road geometry and width constraints

A biased and unjustified route preference

Non-compliance with national technical guidance

Dadswell Drive is not an acceptable construction access route.

Any approval of the CEMP on the basis of current submissions would be:

Technically indefensible

Procedurally flawed

Susceptible to legal challenge

Wooddale Lane is the only practicable, lawful, and safe route for construction traffic.

It would be an utter disgrace if Dadswell Drive access were to be permitted so lets see what the planning department decide or perhaps this decision was also fait au complit.

Kind regards

Telephone:

Email: planning@horsham.gov.uk

Horsham District Council