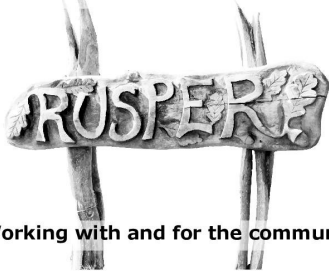


Rusper Parish Council



Working with and for the community

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8th December 2023

Via email

All Horsham District Council Councillors
Horsham District Council
Parkside
Chart Way
RH12 1RL

Dear Councillor,

Rusper Parish Council is highly concerned at the draft Local Plan that is now being considered for adoption by Horsham District Council. Some of our concerns are specific to Rusper Parish, but most apply to policies affecting the whole District. The version of the Plan being voted on at the HDC Council meeting on 11th December seems to have completely ignored the made Rusper Neighbourhood Plan that was fully adopted by HDC only last year.

Most importantly, it is open to legal challenge in three key respects:

1. It breaches existing statutory regulation,
2. It fails to meet its own policy goals, and
3. It fails to acknowledge the risks to delivery and is often based on wrong assumptions.

The impact of concentrating the greatest level of development in the rural parish of Rusper makes little sense in general planning terms, especially in terms of the coalescence of Crawley and Horsham and the impact on infrastructure provision.

Below we list the key points of our concerns and objections that make the proposed plan unsound. Further on, we explain in more detail the reasons why these present a valid case, in planning terms, for rejecting what is currently on the table and instructing the officers to reconsider the plan in the light of these arguments.

Rusper Parish Council will be seeking legal advice on how best to challenge these proposals, should they go ahead, especially in relation to our current Rusper Neighbourhood Plan.

Key Points

1. Housing numbers

There are serious problems with

- a) The calculation of overall house-building numbers – the new target is only marginally lower than the HDPF target and is double what is genuinely needed, and
- b) The concentration of house-building in and around Rusper Parish, making the coalescence between Horsham and Crawley more likely, and bringing into question the Council's spatial strategy.

2. The type of housing

There is insufficient housing for social rent and for the elderly compared to the need.

3. Transport implications

- a) There is a lack of long term planning for the increased traffic from the strategic sites and how this will be managed at a local level and in relation to broader traffic movements around the district,

- b) There is no coherent strategy for improving buses, rail and active travel (walking and cycling) across the district and a lack of coordination of non-car transport, and
- c) The plan lacks an approach to improving safety for recreational road users such as horse riding and carriage driving, cycling and rambling.

4. Infrastructure provision

- a) The implications of water shortage across the south-east region as a whole and specifically for water taken from the Arun Valley have not been addressed fully in the proposals. Additionally, the probable impact of increased flooding along the River Mole have been ignored. There is also no long term strategy for waste water management and ensuring our waterways stay free from sewage and other waste run-off,
- b) The long term issues of electrical power production and distribution to support the massive increase in housing proposed in the plan have not been addressed, and
- c) The issue of health care, both in terms of a much needed new hospital and proper resourcing for local doctors surgeries, especially in new developments, have been ignored.

5. Water neutrality

The specific issues of water neutrality, now a legal requirement for all development in the area, have been ignored, or misinterpreted.

6. Disregard for made plans and planning assessments

The vision and policies within the adopted Rusper Neighbourhood Plan have been ignored, as have HDC's own assessments of key strategic sites as 'not developable'.

This disregard for planning policy, extends into a disregard for democracy with election manifesto commitments to protect our countryside and to put residents first (from all parties) being completely abandoned in this plan. The plan also lacks any broader cross-boundary considerations, especially in relation to the environmental risks highlighted elsewhere.

7. Biodiversity

The scale and variety of habitats across the proposed West of Ifield development have been downplayed, and its recognition as Biodiversity Opportunity Area is ignored. The area is written off as low biodiversity without any consideration of the range of protected species, not least the newly discovered network of Bechstein's bat colonies.

8. Farming and agriculture

The importance of food self-sufficiency, especially at a time of major global climate change, has no consideration in the plan. We need to be protecting our farmland for agricultural production and restricting housing developments to already developed areas.

9. Golf provision

The importance of the existing Ifield Golf Course in terms of golfing sport provision as well as the access to open space that this site provides has been underestimated. There is a thriving golf club that uses the facility and the plans make no provision for a replacement if this land is used for development, despite this being a requirement of the National Planning Policy Framework.

10. Environmental Health

The decision to locate a major strategic site so close to Gatwick Airport, will put all those that live there at risk of exposure to noise and other potential pollution risks. This will be an even greater issue if Gatwick's plans for expansion go ahead.

11. Deliverability and viability

Finally, given the economic climate and the concentration of strategic developments around Rusper, the delivery of the proposed housing targets is at risk, and the level of infrastructure and affordable housing required must pose a huge risk to the viability of the West of Ifield. In fact, there is significant uncertainty around several key aspects of the Local Plan overall – not least water supply and sewage treatment. The NPPF requires uncertainty to be acknowledged and addressed in the Plan, and contingencies proposed where necessary. It's not clear this has been done.

Planning Detail For Key Issues

General Points on Planning Process

Whilst the Parish Council welcomes many of the policies within the new Local Plan, it is clear that there have been a number of major failings in planning terms.

The overall plan has failed to identify the current land use within Horsham District and the importance of each type of use to the local communities. It seems that trying to formulate a clear plan for the future must be based on understanding what currently exists. The base of any new plan must have at least a basic understanding of current land use in rough percentage terms for each aspect of the plan. It must also understand how that use is currently distributed and the reliance of each community area on those functions. Without that initial understanding, allocating land use without understanding the impact on the use it is replacing will potentially have disastrous impacts.

Despite the wide range of policies, the major impact area of the plan is focused on housing delivery. Although, undoubtedly this is a critical aspect of any plan, it seems that for this plan all other facets of planning have been pushed back, or ignored, to ensure that some formulaic housing number can be met. The true impact on transport and road infrastructure alone from the strategic housing allocation sites has been mostly ignored. The principle strategic site, misleadingly called “West of Ifield” is a key example, where a major development is proposed with no direct road linkage to any major road, not even a B road! This site was also put forward as the start of a potential 10,000 home development that would include a “western relief road” for Crawley. Despite the now statutory requirement to consider the longer term impact of strategic developments, the issue of how 10,000 new houses would be managed, or what wider infrastructure requirements should be put in place now to support it, this new Local Plan fails to make any of these considerations¹.

Horsham District Council makes bold statements about protecting the environment and preventing climate change², but fails to recognise the impact of both of these when selecting its strategic sites for development. More significantly, it does not even consider strategic site enhancement that could be done to enhance these goals, but concentrates all the planning effort into housing allocation yet again.

1. Housing numbers

a) The calculation of overall numbers

The new Local Plan continues with a house-building target double what it should be, which will perpetuate population growth at double the national average. This is not acknowledged in the Vision.

Housebuilding in Horsham over the past 20 years has very little to do with local need, and is almost entirely satisfying the demand from investors and households moving into the area. The new Local Plan continues this ‘strategy’. The housebuilding ‘target’ in Horsham’s new Local Plan is 777 houses a year – marginally lower than the HDPF target of 800 which itself was double what it should have been. The target would be 911 without the water neutrality constraints, or even 1,200 a year if the Standard Method calculation was updated with 2021 population census data.

This rate of building is completely unrelated to local need, and means Horsham is growing unsustainably. Horsham’s population grew by 11.8% in the 10 years between the 2011 and 2021

¹Para 22 of the NPPF states: Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

²HDC Climate Emergency Declaration “This Council declares a Climate and Ecological Emergency, based on the International Panel on Climate Change’s AR6 Synthesis Report of March 2023 which states that humanity is in the midst of a crisis entirely of its own making. This crisis has already resulted in a global surface temperature rise of 1.1°C, affecting many weather and climate extremes in every region across the globe, leading to widespread adverse impacts and related losses, including damage to nature and people.

We welcome the recent statement on the climate emergency and biodiversity crisis from our new council leader that “taking real action to combat these will not only be an immediate priority but will also be an ever-present consideration in all that we do throughout this term and beyond”.

“In response to this rallying call, this Council accepts the inadequacy of the climate related motion it passed in June 2019 and, leading by example, will significantly increase the rate of carbon reduction associated with its own corporate plan to achieve carbon neutrality for its direct emissions by 2030 and indirect emissions by 2050.”

ONS censuses, the highest of any local authority (LA) in Sussex or Surrey, and almost double the rate for England and Wales overall of 6.3%.

And this rate of growth is set to continue. Horsham Council may be relieved with a target of 777 but this is the same as the HDPF target, and will perpetuate growth of around 12% over the next 10 years. Targets of 911 or 1,200 will give us 14% or 19% growth over 10 years respectively.

How can this rate of growth be sustainable given the shortage of water in the south-east region, the inability of water companies to treat sewage safely, and the failure of developers and LAs to deliver the necessary infrastructure? None of this is acknowledged in Chapter 3 – Spatial Vision.

The shocking thing is that this growth is the result of excessive housebuilding. This is nothing to do with building to satisfy local need but is deliberate over-supply, with marketing to create demand from people outside the area. As a result, over 80% of the population growth is due to people moving into Horsham from Crawley (25% of the net inward migration in 2019), south London, Surrey, and other parts of the south-east.

b) The emphasis on Rusper area for allocation

Rusper is one of the most rural parishes in the District, comprising approximately 1,000 houses, mostly around the village and scattered hamlets. Rusper's made Neighbourhood Plan makes clear that any significant allocation of sites for housing will have an overwhelming impact on the Parish's character and way of life.

The Local Plan sets out proposals for strategic sites in Rusper Parish and its immediate vicinity which total 7,000 houses (North Horsham with intensification, Kilnwood Vale, West of Ifield). This is 66% of the Plan's proposals for strategic sites. But nowhere in the Plan or its evidence base is this concentration of house-building in and around a single parish acknowledged, explained or mitigation of its impacts discussed. This should at least be discussed in the Plan's Spatial Vision and discussed in Policy HA15 – Rusper. Plus we note that the relevant document is not yet available in the Evidence Base, ie the Horsham Housing Delivery Study Update

We also note that although the Strategic site assessments mention the benefits of urban extension, it doesn't appear that 'urban extension' is a stated Strategic Policy in the Plan.

2. The type of housing

The most pressing need is for social housing in both Horsham and Crawley, where 'social' is defined as 60% of market rents; in addition there is an increasing requirement for housing for the elderly. But developers of strategic sites don't deliver social housing, or even truly affordable housing – they simply add to the over-supply of market housing, with a small percentage of 'affordable' housing at 80% of market price or rent.

- The Local Plan Affordable Housing strategic policy states that, depending on the type and scale of development, sites should provide between 10% & 45% as "affordable" homes. Of that percentage, at least 70% of the total should be social rented and/or affordable rented properties and the remaining 30% should be low-cost home ownership, to include shared ownership and/or First Homes. Given the high cost of rented properties in the District and an ongoing shortage of supply, together with the increased cost of living, the Council's preference is for the delivery of socially rented homes, yet at the current time, the Local Plan has stated that affordable housing funding models limit the ability to deliver these homes.
- The Local Plan should commit to build more affordable, good quality homes at scale, and fast, where these are locally needed.
- The Local Plan should be focused on the delivery of high-quality, climate-friendly social homes. As well as being fundamental to tackle the housing crisis, building social homes would save the public finances by reducing the housing benefit bill and temporary accommodation costs.
- The Local Plan should be including council house building as the type of housing required to boost housing supply; there is an urgent need to help families struggling to meet housing costs, and tackle housing waiting lists. The stock of social homes has significantly reduced as councils have struggled to replace homes lost through Right to Buy. The housing shortage has seen rents and property prices rise significantly faster than incomes, acutely impacting the lowest income and vulnerable families and individuals. Compared to the private rental

sector and homes at affordable rent, social homes provide a genuinely affordable alternative and greater security of tenancy. There are currently not enough social homes to meet current demand. Over 1.2 million households are on the waiting list for social homes in England – including over 700 in Horsham, while almost 100,000 households are living in temporary accommodation, including 120,710 children.

- For many people, social housing remains the only feasible option due to the widening gap between Local Housing Allowance (LHA) and market rents. There are currently not enough social homes to meet current demand.

Following info from: [Local_Authority_Housing_Statistics_2021_22.ods \(live.com\)](https://live.com/Local_Authority_Housing_Statistics_2021_22.ods)

For the year 2021 to 2022 Authority Housing stats for Dwelling stock show that Horsham District Council own no social housing as at 31 March 2022 (social or affordable rent).

- 705 households were on the waiting list (and if you have any rent arrears you cannot be on the waiting list). 172 are homeless (regardless of whether there is a statutory duty to house them)
- 271 Private Registered Provider dwellings let to households

3. Transport implications

a) Increased traffic from the strategic sites

Probably the most unsustainable aspect of the West of Ifield proposal is the broader transport strategy. Access to the site is very poor – it is peripheral to Crawley and remote from any strategic road infrastructure. West of Ifield is the least well connected of all the proposed strategic sites to existing major roads. The current plan does nothing to solve that.

- The roads connecting the site to Crawley or to any major roads have insufficient capacity – they're either country lanes or small suburban roads. In planning terms, the peripheral location of the West of Ifield site does not allow for appropriate opportunities to promote sustainable transport modes and its development would be contrary to both the NPPF sections 106 and 110.
- There are no A or B class roads in or around the Parish, only C, and all are narrow country lanes (5.2m wide or less), lack footpaths (except the junction of Charlwood Road and Ifield Avenue) and are heavily used by agricultural machinery, cyclists and equestrians. The only bus route runs along the Charlwood Road. There are several rat-runs through the parish at peak times, which can be very dangerous to residents.
- Rusper's rural road network and roads through its villages are suited to local traffic densities and are unsuited to carrying the density of through traffic. The roads are narrow with blind corners, no lighting, no kerbs and used extensively for recreational purposes (cycling & equestrian).
- The capacity of the Parish's road network to carry the increased traffic that the housing allocation will generate and cope with the increase without risks to road safety are matters of deep concern in the light of predictable traffic movements from the two main strategic sites.
- In the case of the North Horsham development, the 'rat running' evidence base demonstrates drivers have a preference at peak times to avoid congestion on the southern approaches to Crawley by using Rusper's road network and this 'rat running' preference is likely to intensify with the convenience of a new multi carriageway road through the West of Ifield estate. In the case of the West of Ifield development, traffic to and from a southerly or westerly direction will have no alternative to using Rusper's road network and traffic to and from an easterly or northerly direction will have no alternative to using urban residential roads in Crawley Borough.
- Traffic assessments for the strategic developments in Rusper Parish and its immediate vicinity have been addressed independently of each other, but it is self-evident those assessments are inadequate because the impact of traffic from the Local Plan's building allocation will be cumulative. This cumulative impact is recognised by the Council's policies re; Chapter 8 issue box bullet 7.

- It is our view that the Local Plan is negligent by not giving attention to this matter in order to ensure the Rusper road network has the capacity to safely carry the expected additional density of traffic stemming from the building allocation to Rusper Parish and its immediate vicinity.

b) Improvements to buses, rail and active travel

NPPF paragraph 73 states (inter alia) that developments (including a genuine choice of transport modes) are supported by the necessary infrastructure and facilities.

Bus companies seem reluctant to extend routes to include North of Horsham, and no evidence is presented to indicate that this will be different for West of Ifield

No plans are included to meaningfully increase rail capacity or station car parks, which would be needed at the local stations.

c) Improving safety for recreational road users

The lanes in Rusper and Ifield most at risk from increased traffic volumes are heavily used by cyclists, walkers and equestrians – both riding and carriage-driving. How will Homes England ensure these road users are protected from increased traffic rat-running on narrow twisty lanes? Will Homes England or developers be widening the lanes and providing footpaths and cycle paths? And pressing for additional bridlepaths? We expect to see all these forms of ‘active travel’ being supported across Rusper Parish, not just within the development site.

4. Infrastructure provision

a) Issues of water shortage across the south-east region

The severe water stress in the south-east is mainly caused by lack of investment by the water companies supplying the area, and rapidly increasing demand as populations expand due to house-building. Plus climate change is not helping.

Solving these problems will not be quick, cheap or easy. The water companies are struggling financially and reputationally, and there must be a high degree of uncertainty around their futures. Reducing the daily water usage by households and businesses by water saving measures must also be blighted by uncertainty. And climate change seems set to worsen, exacerbating water shortages in the south-east. So why build such a concentration of the UK’s new housing in this region?

Increased flooding along the River Mole

The West of Ifield site sits in the Upper Mole Valley on heavy Wealden clay and is very prone to flooding. Two rivers run across the site – both of which are immediately surrounded by Flood Risk Zones 3 – and they meet towards the north of the site before flowing towards Gatwick. The bulk of the houses and commercial buildings West of Ifield will be situated on the floodplain between these two rivers. Concreting over arable and green fields, which currently soak up rainfall, and installing drainage systems that allow rain water to run off more quickly into the river Mole will undoubtedly cause more flash flooding downstream if not on the site itself. As a local River Mole expert has explained ‘due to the catchment size, shape, relief, vegetation cover, soil, geology and geomorphology the river Mole naturally has a ‘flashy’ regime meaning it is vulnerable to severe flooding from intensive rainfall ... The natural characteristics of the River Mole catchment are exacerbated by climate change and development. Climate change means weather extremes will happen with greater magnitude and frequency. For the Mole catchment this means more frequent and more intense rainfall episodes that cause flash flooding and, for the foreseeable future, discharges of untreated sewage pollution.’

To what extent is HDC collaborating with Mole Valley District Council?

Long term strategy for waste water management

The two closest Waste Water Treatment Works (WwTWs) at Crawley and Horley are at capacity and are already discharging sewage into the River Mole beyond their permitted levels in storm conditions. Both are on Thames Water’s list of 250 WwTWs to be upgraded, but upgrading is not the same as increasing capacity to deal with ‘000s of additional houses. It’s not clear there are any plans for new sewage treatment works, just ‘improvements’ to existing ones, which are unlikely to satisfy the demand and lead to more raw sewage overflowing into our rivers. And if the necessary additional capa-

city is planned and funded, it's likely to take 10 years to deliver. All this against a backdrop of uncertainty about Thames Water's future due to their dire financial position.

b) The long term issues of electrical power production and distribution

North Horsham development had to modify one of the planning conditions to reduce the number of charging points per property due to the lack of supply which has caused issues with delivery of enough electric car charging ports.

c) Health care

Former Horsham councillor Christine Costin has long championed the need for better medical services. And she spoke out again recently after the Government announced proposals aimed at improving public access to GPs. "The NHS is crumbling away," she said. And, she added: "The truth is simple, in and around Horsham we do not have enough GP surgeries, not enough doctors and staff to serve the population." For many years now there have been huge developments in the area without the extra infrastructure to cater for the vast increase in population. Those surgeries that we have are full to the brim. This must pose a risk to the health and welfare of local residents since health care capacity has not kept pace.

The healthcare situation in Crawley and Horsham is dire, but with little evidence of long-term planning as required by the NPPF.

Given Horsham's population growth there is urgent need for improved hospital services in the district, particularly since Crawley Hospital was downgraded leaving East Surrey Hospital in Redhill, and Worthing Hospital, as prime medical sites to serve much of West Sussex. Horsham residents now face a 45-minute journey to get emergency care. East Surrey Hospital cannot cope with the demand generated by the level of development in the region, but there are no plans for a new hospital. Access to East Surrey Hospital is difficult with constant congestion in the area, limited parking at the hospital and poor public transport (which itself gets caught up in the traffic).

Crawley's GP and dental surgeries are already over-subscribed and national GP, dentist and health staff shortages make change unlikely. Currently it is hard to register with a local preferred GP and people are generally assigned to one – Kilnwood Vale residents are being assigned to GPs in Horsham. And there are no dentists in Crawley taking NHS patients. The new development at Forge Wood has an allocation for a surgery but no GPs will take on the running of the surgery.

This is the situation now – more development in our area will only exacerbate these shortcomings.

5. Water neutrality

We note that that lack of water will affect all possible sites in the new plan, it's the excessive house-building numbers that are the real problem.

There are concerns shared by local residents about the Council's commitment to conservation and environmentally sustainable water supply in a stressed geographic region that relies on river water.

The July High Court judgement has brought into sharp focus those concerns. Compared with Somerset CC that had stood up for its responsibilities to protect the environment, it appeared HDC had misinterpreted the Habitats Regulation to prevent environmental responsibilities interfering with its building plans and the Council's response to the High Court judgement looks like minimal policy realignment to comply with the correct interpretation of regulation instead of policy changes to reset and treat environmental protection as a priority responsibility.

Parishes like Rusper that had 'made' Neighbourhood Plans prior to Natural England's position statement will, in the light of the High Court judgement, by law have to demonstrate water neutrality in their responses to Local Plan housing allocations and in view of the scale of the allocation to Rusper Parish, water neutrality in its Neighbourhood Plan revisions will be treated as an issue of critical importance.

Set against that responsibility we have doubts that some areas of the Council's water neutrality strategy are robust. There appears to be a structural flaw that undermines its integrity and over ambitious or unrealistic assumptions that together represent a 'forwards and upwards in all directions at once' solution that will have a low probability of achievement.

The Council's projections of water demand submitted to the Sussex North Water Resource Zone and used for determining policies in its strategy were calculated before the High Court judgement. The numbers appear to exclude housing on developments with outline planning consent, and statements made in the strategy document revealing the misinterpretation of the habitats Regulation, appear to confirm that exclusion.

This apparent structural flaw in the neutrality strategy is highly significant - it affects in the order of 6,000 houses, bar a few hundred, that had full consent prior to the High Court judgement. It has also important implications, in that developments with outline planning consent are required to demonstrate neutrality instead of being available to provide offsetting.

There are three main assumptions that appear over ambitious or unrealistic:

- a. Water usage; 85 litres per day is credit worthy as a target but over ambitious for conservative planning when set against Southern Water's and WRSE's targets of over 100 litres per day by 2050.
- b. Offsetting; given prominence as the means for individual developments to achieve neutrality but both the availability of existing housing to provide offsetting to Horsham District's developments from within the District or from partner authorities in the Water Resource South East alliance (WRSE) and the deliverability of offsetting are imprecise and uncertain.
- c. Increased water supply; Horsham District's neutrality is highly dependent on Southern Water's leakage reduction in its Water Resource Management Plan that is out of the Council's control to determine and is unexplained in the strategy; alternate means of water supply (rain water harvesting and grey water recycling) are given only vague reference; of particular significance, although WRSE's infrastructure developments plans are impressive, they have long timeframes stretching out to 2035 or 2075 and increased supply from new infrastructure to counterbalance a deficit in water supply predicted about half way through the duration of the Local Plan is not identified.

It is our view therefore that the Council, in order to embrace its special responsibilities for safeguarding sustainable water supply should address a wide array of issues that make its neutrality strategy vulnerable to non-achievement and also give more attention to the means of controlling and sanctioning performance compared with commitments at the levels of individual developments, Parishes and the County.

6. Disregard for adopted plans and planning assessments

Rusper Neighbourhood Plan

Why does the Plan not mention Rusper's adopted Neighbourhood Plan in either Policy HA2 or HA15? In virtually all other Strategic Site policies and Settlement policies the relevant Neighbourhood Plans are referenced repeatedly, but not Rusper's - Why not?

Rusper's Neighbourhood Plan (adopted 2021) was based on a high level of participation from the local residents and received the backing of the electorate in a referendum.

The Neighbourhood Plan's vision is to:

“Value, protect and promote the unique rural parish ... ensuring Rusper remains ... sustainable for people, wildlife and the environment generally.”

The vision includes a key objective to **preserve and enhance our green spaces**.

The Rusper Neighbourhood Plan considered the sites to the West of Ifield and in line with all of Horsham District Council's recent SHELAA's found this not suitable for development.

As well as it being a legal requirement for Horsham District Council to respect the statutory status of the Rusper Neighbourhood Plan, the Horsham Local Plan should also align with the manifesto pledges of the new council leadership and the local councillors.

7. Biodiversity

One of the largest parishes in Horsham District but with one of the lowest populations, Rusper is a distinctly rural parish. It is comprised of the Upper Mole Valley –home to the source of the River Mole – and is bordered by the High Weald Area of Outstanding Natural Beauty, Warnham, Colgate and Crawley. Its character is one of small, vibrant communities – Rusper village, Lambs Green, Ifield Wood – set in a patchwork of farmland, woodland and semi-wild areas. Heavily used for recreation and exercise, the network of walks includes the Sussex Border Path and a ‘green walk’ from Rusper through Lambs Green on to Ifield. The successful pubs also add to the rural character. The West of Ifield site is Crawley’s only remaining ‘rural fringe’ and it should be protected for Crawley residents, as stated in Crawley Borough Council’s draft Local Plan.

The West of Ifield proposals will be devastating for Rusper Parish and for biodiversity. The proposed 3,000 site is phase 1 of a future 10,000 house proposal which would occupy 1,500 acres – 25% of the parish – land which is currently agricultural, woodland and golf course. 75% of the development site is identified as Biodiversity Opportunity Area - rich Low Weald habitat with House Copse Site of Special Scientific Interest (SSSI) at its heart, surrounded by a network of ancient and priority woodland, shaws and hedgerows. At least 320 acres of priority woodland would be destroyed or impacted, of which 150 acres is designated as ancient woodland.

Although Rusper, like much of Horsham district, is poorly surveyed and under-recorded in terms of species and habitat, everything points to it being rich and valuable. Many rare and protected species have been recorded, including colonies of Bechstein’s bats roosting across the proposed development sites. Bechstein’s and Barbastelle bats are the qualifying species behind the designation of Ebernoe Common and The Mens as Special Areas of Conservation (SACs) and national bat expert Martyn Cooke³ advises:

‘When considering its Local Plan, Horsham DC must consider the presence, and importance, of the Bechstein’s colony in the area shown above [north of the District and upper Mole Valley]. Large scale development should not be permitted and for small scale developments safeguarding measures should be implemented to ensure compliance with Annex II species legislation, such as minimal lighting etc. It should be pointed out that if the letter of the European Habitats Regulations were followed, Natural England should designate the area as an SAC.’

In terms of habitat and landscape, expert ecologists and naturalists recognise the value of the area:

WSCC’s Landscape character assessment of West Sussex⁴ recognises the ‘Blocks and strips of interconnecting woodland, including a large number of blocks of ancient woodland ... important for tree species such as small-leaved lime and wild service tree’ and that ‘some localities retain an enclosed rural character, for instance, west of Ifield.’

‘The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copses which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein’s to survive and prosper.’ Martyn Cooke – Surrey Bat Group

8. Farming and agriculture

Britain is running out of land for food and faces a potential shortfall of two million hectares by 2030 according to new research.

- A growing population plus the use of land for energy crops are contributing to the gap.
- The total land area of the UK amounts to over 24 million hectares with more than 75% of that used for farming.

³Martyn Cooke is a Natural England licenced bat worker holding both Class 3 and Class 4 bat licences. Since 2012 he has organised the Mole Valley Bat Project which mainly focuses on the local Bechstein’s bat population. He is a member of the UK Bechstein’s Bat Study Group and the Mole Valley DC Conservation Group. He is also an active member of both Surrey and Sussex Bat Groups.

⁴ <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/> LW4 and LW8.

- Overall the UK runs a food, feed and and drink trade deficit of £18.6bn.
- With a population expected to exceed 70 million by 2030, the extra demand for living space and food will have a major impact on the way land is used, the report says.
- Another factor is the EU, in the shape of the Common Agricultural Policy which now requires farmers to put more land aside to protect nature.

It seems that despite the obvious need to improve and develop farming in the area, Horsham District Council are intent on ignoring this aspect of land use and are focusing all their strategic sites on new housing.

9. Golf provision

Ifield Golf Course is well-used, much-loved and definitely not surplus to requirements. The course is 100 years old, beautifully landscaped with historically important design and provides valuable greenspace for walkers and dogs. Plus it is part of the Rusper Ridge Biodiversity Opportunity Area bordering Hyde Hill Woods – ancient woodland designated as Local Wildlife Space.

If Homes England are unable to show that the course is surplus to requirements then, as required by the NPPF, an equivalent facility will have to be provided, and will need to be in use before the existing club is closed. This will delay the start of construction on the course by at least 4 years, and potentially longer. Does this threaten the deliverability and viability of the Plan?

10. Environmental Health

The West of Ifield site is Crawley's only remaining 'rural fringe' and should be protected for Crawley residents, as Chesworth Farm is for Horsham residents. It would be inconsistent and more than a little ruthless to take away from Crawley residents what Horsham is so carefully protecting for its own.

This site is also less than a mile from the Gatwick flight path and the impacts of noise and air pollution would be a significant impact for those living in this area. The bulk of this site will lie within the 57dB noise contour.

11. Deliverability and viability

As noted previously if a new golf course is required this will delay house-building by at least 4 years, or 7 years if done properly.

Similarly, if a new waste treatment facility is needed this would delay the start of building by 10 years.

More generally, this is an expensive site in terms of infrastructure requirements. Is Homes England funding all of this? Their ability to deliver infrastructure is questionable.

As is their capability to build the required number of houses per year for previous projects. This project is much larger than anything Homes England have previously successfully completed.

Has the viability risk for developers been adequately assessed and mitigated? There must be significant pressure on the viability of the West of Ifield:

- a. Which infrastructure will be funded by developers?
- b. Current and future housing market and economic uncertainty is a big issue, particularly given the Bank of England predicts interest rates will remain high for several years, hitting borrowing costs of both developers and house buyers.
- c. , High costs of labour, inputs and borrowing will all lead to developers restricting supply to encourage higher prices. In other words, a significant risk to the rate of delivery of new housing.
- d. Homes England has also committed to 35% affordable housing claiming this will definitely be delivered – is this really viable?
- e. The high sustainable design standards required by the Plan policies will also impact costs.

Yours sincerely

Lisa Wilcock

Lisa Wilcock
Clerk to Rusper Parish Council

Enc. Rusper Parish Council Transport Survey

Cc Strategic Planning, District Councillor Liz Kitchen, District Councillor Tony Hogben, Jeremy Quin MP, Rusper Parish Councillors.