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Minutes of the Extra Parish Council Meeting on Tuesday 13<sup>th</sup> February 2024 at 7.30pm. This meeting was held at Rusper Village Hall.

Present: M Cooke (Chair), Cllrs G Hussey (Vice Chair), G Sallows, M Fillmore, F Maitland-Smith, S White. District Councillor E Kitchen, Cllr John Milne Deputy Leader Horsham District Council.

**Also present:** There were 31 members of the public.

*Meeting commenced 1949hrs*

#### 21-24 **Apologies**

Apologies were received in advance of the meeting from Cllrs M Fenton, R Gatt, G Fleming, G Adams, County Councillor Katie Nagel and District Councillor Tony Hogben

#### 22-24 **Declaration of Interests**

Members were reminded to make any declarations of a personal and/or pecuniary interest that they may have in relation to items on the agenda. Cllr F Maitland-Smith declared an interest as Chair of Save West of Ifield residents association.

#### 23-24 **Climate Crisis**

The Council **acknowledged** that there is currently a climate crisis and ensured that all decisions made within meeting have consideration to this.

#### 24-24 **Minutes of previous meeting**

**It was RESOLVED** to carry this item to the next meeting.

#### 25-24 **Open Forum**

SWOI representative asked (*question sent via email to the Clerk for minuting purposes*) HDC state that their timeline for the Local plan examination is June-Oct this year, the main modification consultation in November and December, with the Inspectors report expected in March 2025. The inspector may find the WOI allocation unsound, or may ask for such modifications or mitigations as to make the development unviable. Homes England have stated their intention to submit a Hybrid Planning Application in 2024, June has been mentioned, with, no doubt, their intention being ready to destroy our valuable golf course as soon as the plan is adopted. Whilst Para 48 of the NPPF allows planning authorities to give weight to policies in *emerging plans* in considering an application, it is unlikely the new plan would be considered advanced enough in its preparation to allow for this, at the time the HE application is submitted. Therefore it would need to be considered against the existing plan, in which WOI is not allocated, making it a speculative application, which HDC have so desperately been trying to avoid by pushing their draft plan through with such haste.

A question for Homes England would be, why are they putting in at in a planning application ahead of the new Local Plan being agreed, potentially wasting public money and time. Do they just assume the Plan will be approved? And if so, why?

My questions for you are: What efforts are HDC making to ensure that speculative planning applications are not being submitted for major developments, prior to the final outcomes of the new Local Plan? Hopefully that would include advising developers that any strategic development that is not currently in an approved plan would be rejected , and **Question 2** in that the emerging plan is unlikely to carry significant weight for this allocation until much much later in the process, is it the case that the Council won't make a decision on the HE application until a outcome can be relied on, such as the Inspectors report is received? Otherwise HDC should refuse the application and it would be better if Homes England withdrew it.

*Cllr Milne responded that the emerging plan is immature and HDC won't make any decisions until after the inspectors report next year. The party had inherited a flawed Local Plan and the current draft plan is legally compliant.*

A Trustee of the Village Hall - the school utilises the Village Hall in term time but a new proposal of 3000 housing development would create a new infant and junior school. What will this mean for the current village school will it close and who will make that decision?

A member of the public stated that Crawley are against the development as Crawley do not have the infrastructure to support it.

Noted that a resident is also a delivery driver and visits the area for deliveries, he advised the Council that there is no main road link into Ifield and there will be 4,500 cars a day and no major road to support the increase.

Noted a resident advised that WSCC Crawley Junior school is closing down and that is why they are building 10K houses so they can build a new Junior school - does that mean Rusper school will close?

One resident asked that if the Reg 19 plan is adopted in May how can Homes England say that in May 2025 they will build a school and how can that be built in isolation?

## **26-24 Cllr John Milne Horsham District Council – Local Plan (LP)**

Chair welcomed Cllr John Milne who apologised for his late arrival. Cllr Mr Milne is Deputy Leader for Horsham District Council and Chair of Planning and Infrastructure.

Cllr Milne opened by describing the planning system as dysfunctional, but planners do have to follow the law. HDC has little control over schools and infrastructure as they are controlled by departments outside of HDC. LP overall is a strategic direction and not a planning application itself. LP's are a requirement by Government, not popular in any area where there is a high housing demand. The benefit of an LP is that it allows control of where a new development will go along with the benefit of extra funds, S106 tax on developers to provide schools, clinics, affordable housing, however the S106 funds are not adequate to shoulder all of the tasks it is supposed to provide.

Planning officers put plan together, Councillors can overrule but only to a degree, everything must be evidence based but the last word is from the Planning Inspector appointed by Government and that is the key moment of the Plan being agreed or not.

Housing targets are set using a compulsory standard method which compares local house prices with local wages, this in turn is aimed to bring house prices down. Noted that there are no brownfield sites within the District to consider, there is confusion over greenfield and greenbelt. Greenbelt has statutory protection whereas greenfield does not and is open for development.

The made Neighbourhood Plan (NP) has to comply with the made LP, NP are for a short time period whereas the LP will be until 2040 which is 10 years longer so numbers are greater because of that. HDC must allocate large sites and big applications to meet target.

The LP is revised but not reinvented from the last draft. Its preparation has cost £1M so far and it is not practical to delay it or rewrite it. The revised LP has significant improvements such as affordable housing, improved active travel, higher eco building standards, NET zero energy heating so it is expected the new homes will reduce heating bills by £1000 per annum.

HDC follow a Government imposed target; there is a crisis in housing for the younger generation. Planning system is a poor fix, but HDC have to use it. Over the last 10 years Horsham District has experienced too rapid growth, population rose by 11.7% and it is hard to absorb those numbers. The housing target under the standard method should have been 1200 per annum but it will be 480 per annum for the next 5 years.

The number of strategic sites has been reduced – there were 10 available but several were pulled from the LP. HDC decided not to build in Adversane, Buck Barn, Mayfield, Kingsfold and the Kilnwood Vale expansion. HDC have included Southwater 1000 new homes, Billingshurst 650 new homes and West of Ifield is 3000, not 10000 as previously stated. There will be 1600 by 2040 of the 3000. Billingshurst is expected to build within the plan period, but Southwater is unlikely to.

Rusper is a rural parish but in between two main centres and it has access to deepest countryside within 5 mins of leaving a main centre. Crawley are constrained with land area and so cannot meet its house building targets. There is a 'duty to co-operate' with neighbouring District Councils to pick up housing targets. Crawley has job opportunities. Horsham has poor and limited transport routes, A24 and A29. HDC do not build transport and cannot put in roads.

Another alternative would have been to build a whole new town, 10-15000 houses and leave the villages to build to their made NP. However, Planners and Councillors have to meet the target. If HDC took out West of Ifield land would have to be found elsewhere but Adversane and Buck Barn are too far away from Crawley's need.

HE are going to build a secondary school at the start which was a powerful reason to choose the site. HDC wants to avoid a merger of Crawley and Horsham which is unpopular with both communities. It will lead to a bad design. HDC plans to apply for greenbelt status for land between Horsham and Crawley - the first greenbelt land in Horsham District.

Crawley and Horsham have good relations at officer level, officers are communicating well and are continuing to do so. HDC will be allocating 50% of affordable housing to Crawley. Duty to Co-operate is applied to housing and to schools.

There are problems with the site - transport, this will be mitigated by a Fastway corridor bus travel which legally had to pass WSCC Highways analysis, which is did. The inspector will look at the evidence, but HDC have to take the statutory body view.

Water neutrality – water comes from the Arun Valley, Natural England stated that over extraction was damaging the environment and declared an increase in water extraction could not occur until it was ensured that the environment was not damaged.

Please refer to the SNOWS project review Part C - neighbouring District Councils are all onboard with this. Southern Water have to increase supply from other means so new development will have to offset water usage. Developers will retro fit flow constrictors and reduce water flow through the houses; this will be mainly in social housing because they are Council run. Private owners can do it but the Council cannot force private owners to do so. These flow restrictors do not affect experience of water services as everything works the same, but bills are reduced and water usage decreases. . Guidelines are 110 litres per day for any water stressed area. Target will be 85 litres per person per day for new-builds. Rain-water recycling and rainwater capture will help mitigate this, a mains average of 85 litres per day will be set but this does not mean the user will be cut off once they reach 85 litres. This can only be implemented via new houses. This in turn creates water headroom for new building, HDC cannot get enough water in the early years of the plan due to water neutrality. This will not last long as Government want to get rid of water neutrality but in turn the housing target may go back up to 1200 which is why it is important to get the plan through quickly.

In conclusion, Officers are confident that the plan will go through; they must work within the law and are confident the LP will give legal weight and greater security.

#### **27-24 Questions and answers from Councillors.**

1. We note a general disregard for Rusper Parish in the Plan. Policy HA15 - Rusper is inadequate and less developed than those for other areas. There is a distinct lack of mention of any cooperation with Mole Valley District Council, or concern about effects of the Plan on the River Mole. What is Horsham District Council's response to this charge?

A - Officers look at things from objectives in the same way your NP went through the same criteria.

*Noted by a Councillor that that every SHLAA report has rejected the land west of Ifield.*

A - This is common the general planning law has changed, targets have changed, often the case that the application is not the same as the one that was previously rejected. Planning Officers work objectively, planning law can go against natural justice. Councillors do have a say. The plan was pulled last time because they did not think they would get it through on their own vote. The 3 sites are the same as last time, they have been modified but they are the same sites. The

delays to the first LP was water neutrality and the declaration of the emergency. Also, the NPPF was being revised with a long term strategy and that is why they pulled the representation last time.

*Noted by a Councillor that the NPPF long term views have not been applied to this draft LP. 10000 are still part of the long-term strategy for the west of Ifield and 10000 homes are still mentioned as a long term strategy within the report.*

A - The 30-year vision has a very slight change referred to in various places, HDC cannot rule it out but other processes will cancel out the possibility of 10000 homes.

2. What is Horsham District Council's 30-year vision and where can it be found in the Plan?

*Noted by a councillor that 11.7% population growth for the district is unsustainable, but this rate is set to continue. The house building target from 2011 to 2021 was 800 per year and HDC delivered more than that. HDC now plan 480 for next 5 years but the rate then increases so that the annualised figure is 770 per year for the whole plan period. The calculation is equally unsustainable as it will still be at 11.7%.*

A - Population growth - next census will include the last couple of years where our build rate has been low due to water and covid. It will be 7 – 8 years before it increases again. Policy is 10.21 which is unsustainable target for the district.

Unbuilt existing planning consents – these are integrated into the system. Currently at 6500, this can be double to approx 13000 of unbuilt but this will include some to be built after 2040 so do not form part of the plan.

*Do we need more planning permissions when there are houses with permissions that are unbuilt?*

A - HDC have no control over build out rates. It is the problem with the planning system - unbuilt permissions will not be within the plan period.

3. The highly concentrated allocation of housing provision (80% of strategic sites) to Rusper Parish and its immediate vicinity is not acknowledged or given attention in the Reg 19 Local Plan. Could we have your comments about the implications of the concentration.

A - Rusper is in between 2 populations centres, housing is not being distributed fairly but there are pressures forcing it - there are many unfair things within the plan. Rusper will double in size, as the LP is another 3000 homes. A new settlement such as a new town would have been more appropriate.

4. The Reg 19 LP disregards Rusper's 'made' Neighbourhood Plan. Could we have your comments on why and whether this can be rectified.

*Question answered in previous minutes.*

5. How is the Plan sustainable given the excessive rate of population growth the Plan will deliver, and the medium to long term lack of water supply and waste-water treatment capacity?

Can Horsham District Council please provide evidence that Horsham District Council and Homes England are putting plans in place with Thames Water for increased wastewater

treatment capacity for the West of Ifield, and with Southern Water for medium to long term water supply for the district as a whole?

*Question answered in previous minutes.*

**Transport and traffic.**

6. We don't believe that Horsham Councillors made decisions with full information about the impacts of the West of Ifield on transport infrastructure and traffic in Rusper and Crawley.

Within the evidence base you will see traffic analysis and pressure on main routes and junctions and if does not meet criteria it will be rejected. Impact of all sites and it is modelled on that. The information the statutory body provides cannot be contradicted.

To what extent did Councillors discuss the assumptions in the transport modelling about how active travel will supposedly reduce car use?

*Question answered in previous minutes.*

To what extent does the modelling take into account cumulative effect of Kilnwood Vale and North Horsham as well as West of Ifield?

*Question answered in previous minutes.*

Western Relief Road. The latest plan seems to have dropped any proposals for the 10,000 home extension to the initial West of Ifield phase. Does this mean that the concept of a western relief road has also been dropped? If so, has this been taken into account with all of the traffic modelling?

*Question answered in previous minutes.*

7. Why is Horsham District Council building an urban extension to Crawley when Crawley neither wants or need it?

*Question answered in previous minutes.*

8. The Plan contradicts itself in terms of whether West of Ifield is helping with Crawley's unmet housing need – on the one hand it suggests it's not because of water neutrality constraints (10.12), but elsewhere suggests it is helping (10.38), presumably because it serves Horsham District Council's narrative to justify building West of Ifield. Can Horsham District Council please explain this apparent contradiction.

*Question answered in previous minutes.*

9. What does Crawley Borough Council's opposition to West of Ifield mean for the Duty to co-operate and Statement of Common Grounds?

*Question answered in previous minutes.*

10. Several experts are noting a lack of evidence, data and detail to support the Plan - *for example, there is no detail on the proposed mitigation measures to address the adverse landscape and visual impact that on the proposed West of Ifield development.* Is Horsham District Council confident that the Plan has been prepared on a sufficiently sound evidence base? Why is the evidence base thin compared to other Local Authorities?

*Question answered in previous minutes.*

11. We're concerned that many of the key policies in the Plan are weak and so present a very low bar for developers to clear. Plus, there is insufficient evidence to support the policies in the first place.

For example, Policy 17 - Biodiversity and Greenspace – Sussex Wildlife Trust said in 2020 that the whole Local Plan should not go forwards due to the lack of ecological data to base allocation decisions on. Nothing has changed since then.

How can the Sustainability Appraisal have been done without these data, and how will anything meaningful be done in terms of Biodiversity Net Gain without baseline data?

Homes England's Environmental Impact Assessment Scoping Request showed that they do not intend to survey areas such as Ifield Brook Meadows Local Wildlife Site and Hyde Hill Woods Local Wildlife Site (ancient woodland) – both of which run alongside the most densely built parts of the West of Ifield site.

*Question answered in previous minutes.*

12. The Ifield golf course is a valued recreational facility within the locality. Could we have information about the Council's decision on Homes England providing an alternative facility.

A - HE made a summary note on the subject which was not enough and HDC have pressed them for more many times. HE have to build another course somewhere else and have to satisfy the legal requirement of a golf course.

*Councillor further question – HDC claim HE are better than most developers to deal with but HDC are now telling us they are not coming up with what is needed. There is evidence that HE does not deliver and are not truthful. How will the residents ever have confidence in them? They have a high turnover of staff and vacancy rate, frequently changing remit, and are under huge pressure to deliver housing. Ruspers are the ones that are going to suffer as a result of all of that.*

A - HE have the means to buy a land for a golf course. If the inspector says they have to meet that then they will have to meet it and it will be required to do it. NPPF says they have to provide an alternative. It should be a requirement of HDC and they should have asked for it. HE have to satisfy the inspector, this may involve providing a tiny course.

*Councillor further question – Under planning law, HDC have a full assessment of all applications against current planning regs. They should have assessed the site in line with the NPPF where a golf course is lost and HDC should have made that a stipulation. The Inspector will make the same judgement and whether HDC have fulfilled the requirements. Why is there no recommendation about Ifield Golf Course being lost. HE has only given a summary note?*

A - HE are expected to produce their plans for an alternative golf course before examination.

13. Can you please explain your Policy 9 Paragraph 1 in the local plan concerning Water Neutrality, whereby new residential properties are to utilise no more than 85 litres per person per day, how was this figure calculated and how and who will enforce this.

*Question answered in previous minutes.*

14. You have agreed that 50% of the proposed affordable homes in West of Ifield will be allocated to Crawley to reduce their housing list as Crawley does not have the space to build properties for its growing population, are Crawley Borough Council funding the 50% of costs of these affordable homes and infrastructure that will be required.

A - HDC planners will only make minor changes to the draft LP before it goes to inspection. Permitted development has been extended so for example if an office block were changed into flats, it will not affect the numbers.

**27-24. Landscape Survey**

To **adopt** the Landscape Survey as distributed before the meeting. Carried to next meeting.

**28-24 Local Plan Consultation Responses**

Councillors to discussed how to respond to the Local Plan Regulation 19 consultation and **agreed** to submit a final version of the response to the Clerk for approval at the next full Parish Council meeting. Item carried to next meeting.

**29-24 Open Forum**

**Parish Councillors** will take questions from the **public**

Member of the public asked the Council ask Crawley Council if they have a written to object to the Local Plan and to ask for a copy of their objection.

Noted that the Parish Council have raised objections a copy of this can be found on the website. The NPSG will submit a response with the views represented this evening to include policies HA2 West of Ifield and HA15 Rusper Parish in particular.

Noted that everyone can email the Clerk with their comments for the Council to include them within the response.

*Meeting closed 2154hrs*

**Next meeting is a combined Planning and Parish Council meeting 27th February 2024.**

Signed..... Date.....