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Mrs Emma Parks  
Head of Development  
Horsham District Council  
Parkside, Chart Way, Horsham  
West Sussex RH12 1RL

18 October 2018

Dear Mrs Parkes

**DC/18/1792: Outline application for the erection of 5 residential dwellings and associated works. All matters reserved except for access.**

Great Ventors Development Site, Coolhurst Close, Monks Gate

In the light of Strategic Planning's Internal Consultation Report of the 3 October 2018 on the above site, the Parish Council is writing to express its extreme disappointment. This letter puts before HDC some additional facts that are relevant and trusts that HDC will now review the Report and this letter very carefully before making a decision on this application. These facts are presented in [PART 1](#) that deals specifically with Strategic Planning's Report and [PART 2](#) that deals with other relevant facts.

Before presenting new facts, the Parish Council would also ask HDC if it has fully considered the consequences of planning permission being granted for this application, because they are very serious? In the Parish Council's view, the grant of permission at Coolhurst Close would have the following consequences:

[Other developers will follow suit, with the consequence that the Parish's contribution of new dwellings will exceed, and perhaps far exceed, the figure of 50 dwellings that was democratically voted upon and accepted at Referendum. In practice, control would be lost over numbers, totally negating the Parish's Neighbourhood Plan.](#)

## PART 1 (relating to Strategic Planning's Report)

### Fact 1. Policy 5 is the whole of the section that bears that title.

The intention of the NP was that the whole section headed "Policy 5" should be policy, whether in bold type, or not. There are 5 reasons to support this statement.

1. Policy 5 was written in the style current in 2015 when the NP was written. The un-bolded text which contains the numbers "9-12" is not headed "*Reasoned justification*". That is an invented phrase used by the Report's writer to suggest the numbers 9-12 were not policy, and this is both unfair and unacceptable. Please note that when the NP was approved by the Independent Examiner and was legally made by HDC, the whole section was accepted as policy without query.
2. Had the NP considered that 15 dwellings on the site would constitute an appropriate scheme, it would have said so in its policy. As it happens, the policy says 9-12, and not 15.
3. Please note also that the wording in Policy 5 confirms it is policy, cf. "*the location and nature of the land require a number of key development principles to be adhered to in order for a satisfactory scheme to be delivered and these are also set out in the policy*".
4. Please also note that the use of the word "*may*" in the text of the policy does not mean that the number "could be" 9 - 12, or higher or lower at the developer's discretion, but rather that the policy "*gives permission for*" 9-12 dwellings. (Oxford Dictionary of English, where one definition of "may" is given as "to give permission").
5. The NP provides for 9 - 12 dwellings as a result of community engagement and this is in line with HDC's HDPF Section 2.2 which says that, "*Local Plans are primary vehicles for making decisions about scale and location of growth*". It follows then that developers are not primary

deciders of how many dwellings should be built on sites. In this case, the developer should not be allowed to over-ride the NP by dividing the site into two in an attempt to exceed the allocated number of dwellings.

**Fact 2: The five criteria in policy 4 of the HDPF are not satisfied by this application and they must ALL be.**

1. Criterion 2, *“The level of expansion is appropriate to the scale and function of the settlement type”*, **is not satisfied.**

- There are currently 44 dwellings in the hamlet of Monks Gate. The total NP site was allocated in the policy for the development of 9 to 12 dwellings. This would increase the size of Monks Gate to between 53 to 56 dwellings, **an increase of between 20% and 27%** for this small, unclassified hamlet.
- The approved application on the larger part of the NP site is currently being built and provides 10 dwellings making a total of 54 dwellings, **an increase of 23%**. This respects the percentage growth of Monks Gate that was intended by the NP.
- The current application (DC/18/1792) proposes another 5 dwellings crammed into the smaller part of the NP site which would make a total of 59 dwellings, **an increase of 34%**. This is **significantly greater** than the increase in number of houses/percentage growth intended by the NP. It represents **over-development** of this small settlement of Monks Gate and **it adversely affects the character and community balance of the settlement.**

2. Criterion 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”*, **is not satisfied.**

- The NP assessed local need for housing with the assistance of AirS. The figure of 50 dwellings emerged and this is being/will be provided for by the 9 allocated sites in the NP and the numbers of dwellings in

their policies. The additional dwellings at Coolhurst Close therefore have not been demonstrated as being required for the “*identified local housing need*”. Nor have they been demonstrated as necessary for “*employment needs*” or for the “*retention and enhancement of community facilities and services*”.

## PART 2

### Further facts that point towards a refusal of this application but not mentioned in the Strategic Planning Report

#### A DENSITY OF HOUSING IS INAPPROPRIATE

1. The total site, measuring 1.2 hectares, was allocated for development in the NP for between 9 and 12 dwellings. This gave a housing density of between **7.5 to 10 houses/hectare**.
2. However, the site was split into two by the developer. The first planning application was approved for 10 dwellings on the larger portion of the site that measures 0.97 hectares, giving a housing density of **10.3 houses/hectare**.
3. This planning application for 5 dwellings, crammed into the smaller portion of the site, measuring 0.23 hectares, gives a housing density of **21.7 houses/hectare**.
4. This planning application for 5 dwellings on the smaller portion of the site thus proposes to **over double the density of housing** found in the larger portion of the site that is currently being built. It also **well over doubles** the housing density that was intended by the NP.
5. Doubling the housing density is unacceptable, especially as this proposed development is in a small hamlet of only 44 dwellings which are generally in much larger plots. The proposed housing density of **21.7 houses/hectare** would not be in keeping with the rest of the hamlet. It would produce a degree of “massing” that does not reflect the existing nature of the hamlet. Furthermore, the proposed development is on an open field that adjoins another field, and this high level of housing

density and “massing” would not provide a gradual transition from the built environment to the fields beyond.

6. The proposal, and especially its density, does not “*integrate with the surroundings and the historic landscapes*” which are agricultural fields. (HDPF Policy 32.3)
7. Therefore, the proposal in DC/18/1792, because of its **unacceptably high housing density**, thereby contravenes:
  - **Policy 5ii of the NP because it does not “provide a layout which is sympathetic to the nearby houses.**
  - **Policy 10 of the NP which requires the “scale, density, massing.....to reflect the architectural and historic character and scale of the surrounding buildings”**
  - **Policy 32.2 of the HDPF because it does not “complement locally distinctive character and heritage of the district” and policy 32.3 because it does not “integrate with the surroundings and the historic landscape”**
  - **Policy 33.3 of the HDPF because it does not “ensure that the scale, massing and appearance of the development...relates sympathetically with the built surroundings”.**
  - **One of the “Assessment criteria” for settlement boundaries in the Review of the HDPF since this requires a gradual transition from the built environment to the countryside beyond.**

## **B IMPACT ON NEIGHBOURING PROPERTIES**

The dwellings currently being built are having an effect on the neighbouring properties, particularly Southland Cottages and have altered the hamlet’s skyline when viewed from the A281 travelling southwards. The current proposal would exacerbate those effects, creating adverse amenity impact on the neighbouring properties. In the pre-application advice, the Planning Officer recognised, “*I do have concerns over the potential for amenity impact on the occupants of numbers 1 and 2 Southlands Cottages*”. But, the impact goes far beyond these cottages. The

proposed development is too intensive and does not respect the nature of this small hamlet.

The proposal, because of the overdevelopment of Monks Gate, the high density of housing and its impact on neighbouring properties contravenes:

- **Policy 5ii of the NP because it does not “provide a layout which is sympathetic to the nearby houses.**
- **a key criterion in “Policies for Growth and Change” in the HDPF which seeks to avoid “Adding new housing areas on existing small settlements” and unduly affecting “the character and community balance of the settlement.”**
- **Policy 32.2 of the HDPF because it does not “complement locally distinctive character and heritage of the district” and policy 32.3 because it does not “integrate with the surroundings and the historic landscape”**
- **Policy 33.2 of the HDPF because of the “unacceptable harm to the amenity of occupiers/users of nearby property”.**
- **Policy 33.3 of the HDPF because it does not “ensure that the scale, massing and appearance of the development...relates sympathetically with the built surroundings .... including any impact on the skyline and important views”.**

## **C HOUSING REQUIREMENTS**

- The Neighbourhood Plan is fulfilling its housing requirements, so these extra dwellings are not needed.
- Horsham District Council has a 5 year supply of housing so these extra dwellings are not needed.

- Therefore, these extra dwellings at Coolhurst Close are clearly not needed in the Parish or in the Horsham District.

## **D EFFICIENT USE OF LAND**

Policy 33.1 of the HDPF says, "*Make efficient use of land..... whilst respecting any constraints that exist*". Constraints exist. The site is constrained by the Neighbourhood Plan's policy 5 which requires 9 to 12 dwellings. It is also constrained by policy 10 of the Neighbourhood Plan which covers the scale, density and massing of developments, and as been shown, 15 dwellings on the site contravene policies 5 and 10.

## **CONCLUSION**

Because this application DC/18/1792 contravenes so many policies, namely policies 5 and 10 of the Parish's Neighbourhood Plan and policies 32 and 33 of the HDPF, it should be roundly refused. This letter supplements the Parish Council's previous submission of 21 September 2018.

Yours sincerely

Sarah Hall  
Clerk, Nuthurst Parish Council

Copies:  
Rowena Maslen, Case Officer  
Toni Bradnum, Nuthurst District Councillor