



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

Attn.: Mr M Porter, Case Officer

Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

1 February 2021

Dear Mr Porter,

Representation submitted for and on behalf of CPRE Sussex objecting to:

DC/20/2596

Brinsbury Fields, Stane Street, North Heath, West Sussex

Reserved Matters application for appearance, layout, landscaping and scale pursuant to approved outline application DC/17/0177 (which included access from Stane Street A29) for up to 6 commercial buildings comprising a mix of B1, B2 and B8 Use Classes

Our concerns and reasons for objecting to this application are given below.

1. **As is explained in Horsham District Council Planning Committee Report, 17 October 2017, Application DC/17/0177 (for outline planning permission), the proposed scheme is “is contrary to Policies 2, 4, 7, 10, 25, 26, 27 amongst others”, including HDPF Policies 24 and 33.**

1.0.1 It is CPRE Sussex’s view that the Reserved Matters application, DC/20/2596 is also contrary to these policies, and that the reasons why the Committee considered DC/17/0177 to be contrary, quoted below, are pertinent to DC/20/2596.

1.1 The report advises that:

Paragraph 6.34 ***In terms of lighting, little detail has accompanied the application beyond a high-level External Lighting Strategy Report. This report recognises the sensitivity of the site in open countryside with little existing brightness and acknowledges the impact artificial lighting can have on bat roosts, their access points and flight paths. The report sets out that the lighting strategy will be sensitive to minimise impact on bats and other wildlife, to include mitigation methods such as the use of baffles to focus light and lighting controls to limit the amount of time artificial light is use. Nevertheless, given the nature of B1/B2/B8 uses it would be expected that light impact from artificial lighting and vehicle headlights would have the potential to be highly intrusive in this countryside setting.***

Paragraph 6.37 ***The Council's Landscape Architect considers the harmful impact on visual amenity to be greater than as assessed in the LVIA.*** The Landscape Architect considers that although the site is relatively well contained from public footpaths and higher visual sensitivity receptors, from the A29 the scheme would cause a significant deterioration to the character of the existing view and be seen to considerably intrude into the open countryside. The mid-long term impact is considered to be major-moderate adverse to the visual amenity for passengers on the train to the east of the site, for users of the A29 to the west of the site, and to a lesser extent students using the end of the public footpath to the east of Brinsbury Campus. In terms of cumulative impact, the Landscape Architect disagrees with the LVIA assessment, identifying that the site provides an important separation gap between the hamlet of Adversane and Brinsbury Campus, and that the infill of Brinsbury Field would considerably reduce this gap adversely affecting the character of Adversane and compromising its rural setting. The proposed developments combined would also further extend and exacerbate the ribbon of development along the A29 and generate urbanising effects such as lighting and traffic movements.

Paragraph 6.38 ***Overall, the Council's Landscape Architect has raised concerns with the proposals stating that development up to the extent indicatively proposed would be out of scale and would intrude considerably into the settlement setting of Adversane, reducing the open rural gap between the hamlet and the Brinsbury Campus and significantly changing the character of the area.*** Further significant concerns over the impact of the development on the countryside setting have been raised by West Chiltington and Billingshurst Parish Councils and a number of third parties. This concern relates to this proposal alone, as well as the combined development with the concurrent full planning application, which would exacerbate the combined landscape harm.

Paragraph 6.39 ***In respect of the concurrent application for the southern half of Brinsbury Field the Landscape Architect has raised similar objections which are also applicable to this proposal, commenting that the large nature of the proposed development is considered inappropriate for its rural location as it would replace an area of pasture land with a commercial development, significantly change the undulating topography, result in the loss of the old field pattern, and exacerbate the urbanising effect along the A29 Stane Street, a Roman Road.*** Further, it would reduce the openness and break between the Brinsbury Campus and the hamlet of Adversane causing harm to this settlement identity, whilst the introduction of the buildings, signs, artificial lighting and increased levels of activity would prevent the sense of leaving a settlement and passing through the countryside along the A29. The Landscape Architect considers that this would run contrary to Policies 25, 26 & 27 of the HDPF, Policy AL5 of the Specific Site Allocations of Land DPD, and the Test of Appropriateness 2 within the SPD as a result. The developments considered separately would result in these harmful impacts, and considering the impact of both developments together, the harm would be exacerbated.

Paragraph 6.40 ***It is considered that the indicative extent of development proposed on a site isolated from existing settlements or buildings at the Campus does not reflect the rural location and characteristics of the site or surrounds. Considered in tandem with the adjacent site under DC/16/2963, the***

cumulative impact would result in significant ribbon development along the eastern side of the A29 between the campus and Adversane. Considered both on an individual basis and cumulatively, the addition of potentially large warehouse-type structures with potentially large areas of associated hardstandings and new traffic movements, lighting and potential security infrastructure would be in stark contrast to the remaining countryside surrounding the site and would visibly urbanise this open, rural land. The resultant impact would be the significant loss of the sense of leaving a settlement and passing through the countryside along the A29, contrary to Policy 27 which seeks to protect such settlement gaps. Whilst a setback and landscaping has been proposed to help reduce this impact, the planting would take many years to mature and would nevertheless be unlikely to sufficiently disguise the site or otherwise wholly mitigate the harm identified given the indicative extent of development proposed. **For these reasons the proposed development would not meet Policies 25, 26, 27 & 33 of the HDPF, the Tests of Appropriateness 2 & 3 of the Brinsbury SPD, and therefore Policy AL15 of the Specific Site Allocations of Land DPD.** These policy conflicts weigh considerably against the grant of planning permission.

Paragraph 6.41 **The application site is set approximately 150m south of the Adversane Conservation Area which includes a number of Grade II listed buildings.** Neither the Conservation Area nor the listed buildings are directly visible from the site, being screened behind belts of woodland along the A29 and at the edges of the field in between. **The Conservation Officer considers the flat topography and open character of the land to the south of these heritage assets, including the application site, to contribute positively to the rural setting of the assets and the rural sense of place between Adversane and Codmore Hill.** The proposed development would erode this character and the Conservation Officer has raised objection accordingly.

Paragraph 6.42 **It is agreed that the loss of this part of the open field to facilitate this development would part-erode the rural open character south of Adversane, principally as it is the part of the field closest to Adversane. This is considered to result in some harm, albeit limited, to the rural setting of the conservation area and listed buildings.** Whilst no such harm was identified with the development of the southern part of the site under DC/16/2963, this was because this northern part of the site was to remain undeveloped thereby retaining an open buffer to Adversane. In this case, although open fields opposite and the smaller field to the north would remain, the experience of passing through open countryside between the Campus and the historic isolated settlement of Adversane would be eroded by the intrusive impact of this development, both individually and cumulatively with the adjacent development on the field.

Paragraph 6.53 The WSCC Highways officer **“had advised that the distance of the site from population centres is a major concern for the accessibility of the site, and that this should be considered in the wider planning balance.** The applicants Sustainability Note argues that the development will sustain local rail services, with staff and customers able to use the rail service to access the site, and staff to be able to cycle to the site from Billingshurst and Pulborough. From the evidence from the site visit and the comments of the WSCC Highways officer, this does not appear to be a realistic assumption. As set out **above the A29 has no**

footpath for long stretches and is narrow with fast moving traffic. This does not lend itself amenable for cycle usage or pedestrian access from the nearest rail station 3.3km to the north (a 40 minute walk). Realistic sustainable options for staff and customers would therefore be limited to the hourly bus service”.

2. Contrary to paragraphs 4.11 and 4.26 of the applicant’s Planning Statement the commercial buildings proposed for the development are neither sympathetic to, nor in keeping with the site’s rural setting.

2.1 The applicant’s Planning Statement advises that

Paragraph 4.11 *“the proposed appearance of the 6 buildings, as shown on the elevation drawings submitted by Brooks Murray with this application are considered to be sympathetic to their rural settings”.*

Paragraph 4.26 *“Aligning with criteria set out in policy 32, the proposals seek to provide a commercial development of 6 units at c14000sqm which is in keeping with its rural setting”.*

2.2 However, whilst in appearance and size these commercial buildings (6 units with total footprint of up to 14,068 sqm. Planning Statement, paragraph 2.9) would not be out-of-place in an urban setting.

2.3 Brutalist and landscape harming, they are neither sympathetic to, nor in keeping with the rural setting.

3. Although the site does not form part of a valued/protected landscape, in the context of NPPF paragraph 170(a), paragraph 170(b) sets out the need to recognise the intrinsic character and beauty of the countryside.

3.1 In his interpretation of HDPF Policy 25 (1) and how it should be applied, the Planning Inspector who determined Appeal APP/Z3825/W/19/3227192 Land north of Sandy Lane, Henfield, West Sussex, BN5 (Decision date 7 October 2019) explained at paragraph 55 of the ‘Decision’ that NPPF paragraph 170(b)

“sets out the need to recognise the intrinsic character and beauty of the countryside. This is generally reflected within the relevant development plan policies (e.g., HDPF policies). I do not find the wording of policy 25(1) of the HDPF to be inconsistent with the Framework in this respect. The level of protection required is not be as great as for a valued landscape. However, clearly the Framework would not set out to provide for no protection of areas of countryside, in terms of those area’s character and appearance, that are not specifically designated. The requirement of policy 25(1) does not seek to prevent development in the countryside but clearly requires that inappropriate development should normally be avoided. This is generally consistent with the wording of the Framework to recognise the intrinsic character and beauty of the countryside”.

3.2 The proposed development is inappropriate and should therefore ‘be avoided’.

4. We note the misleading advice at paragraph 4.11 of the Planning Statement that “the design of the buildings and how they have evolved is informed by the potential allocation at Kingswood Village”.

4.1 The wording of this statement is misleading because contrary to the apparent understanding of the authors of the Planning Statement, 'Kingswood Village' does not exist.

4.2 Presumably, the none-existent 'Kingston Village' is the applicant's proposed new settlement 'Land at Adversane, West Chiltington Parish (Kingswood)', which if approved and allocated in Horsham District Council's new local plan, would transform the existing rural locality by urbanising it.

5. It would appear from the Planning Statement (notably paragraph 5.10) that the Reserved Matters application is predicated on a presumption that the applicant's proposed new settlement will be approved. Paragraph 5.10 states that

*"This Reserved Matters application has been carefully designed and coordinated to be consistent with the Outline Permission **and also the wider aims and vision for Kingswood.** Details relating to the application will also be made available on the Kingswood Village website post validation".*

6. CPRE Sussex is concerned that contrary to NPPF paragraph 180 the impact of light pollution from artificial light on local amenity and the area's rural character and nightscape, and perception of same, has not been assessed. Likewise, cumulative effects.

6.0.1 This application should not be decided without a detailed assessment.

6.0.2 The scope the of assessment should take into account cumulative effects, including light emissions from the Hepworth Brewery, and also the permitted (DC/13/2328) yet to be built 3x car showrooms with associated workshops and other commercial development including head office for the Harwoods Group.

6.1 In terms of lighting, as with the Outline Application (DC/17/0177), little detail has accompanied the Reserved Matters Application DC/20/2596) beyond a minimalist 'External Lighting Strategy Report', which summarily details generic design standards, guidelines, and possible mitigation measures, and also a site plan showing where each of a multitude of external lights could or would be positioned.

6.2 No assessment is made of resultant night glow and how that glow could or would impact on the Adversane Conservation Area, approximately 150 metres to the north of the proposed development site, and on the amenity of residents there and at the Adversane caravan park. Likewise, the impact on the night sky and setting of the Southdowns National Park.

7. It is reasonable to surmise that given the extent of the proposed scheme and the mass and height of its buildings the overall impact of the scheme's lighting will materially increase light levels and be highly obtrusive in the site's rural setting.

7.1 This failure to assess the impact of the scheme's external lighting is contrary to the NPPF paragraph 180 stipulation that

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

c) *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*".

7.2 Planning Practice Guidance (PPG): Light Pollution, states that artificial light

"is not always necessary, has the potential to become what is termed 'light pollution' or 'obtrusive light' and not all modern lighting is suitable in all locations".

"It can be a source of annoyance to people, harmful to wildlife, undermine enjoyment of the countryside or detract from enjoyment of the night sky. For maximum benefit, the best use of artificial light is about getting the right light, in the right place and providing light at the right time". And that

"Lighting schemes can be costly and difficult to change, so getting the design right and setting appropriate conditions at the planning stage is important".

(Paragraph: 001 Reference ID: 31-001-20140306):

8. How an additional 1,250 vehicle movements per day would impact on the amenity of Adversane's residents and other communities along the local road network, North Heath, and Pulborough for example, seems not to have been assessed or taken in to account. The impact should be assessed.

8.1 The Reserved Matters Transport Statement, December 2020 states that

"An updated trip generation assessment suggests that the site would generate 1250 vehicle movements, with 117 and 118 occurring during the network AM and PM peak hours respectively" (paragraph 7.1.2).

8.2 How many of these additional vehicle movement would be by HGVs is not clearly explained, which is surprising given the nature of the proposed scheme, comprising as it does 'up to 6 commercial buildings', including 'storage' buildings.

8.3 The impact should be assessed and considered.

In conclusion, CPRE Sussex asks that the application be refused for the reasons explained above.

Yours faithfully,

Dr R F Smith DPhil, BA (Hons), FRGS
Trustee CPRE Sussex

Copy to Director CPRE Sussex