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By e-mail and by post
anita.gardner@arun.gov.uk
Our ref: PPG/LL/AMW/45111905/Fuller
Your ref:

21 October 2014

Dear Madam

Planning application ref: AB/107/14/PL
Brooklands, Priory Lane, Arundel, West Sussex BN18 0BG

We are instructed by Mr Graham Fuller to object to the above planning application.

Our client is a local resident who will be affected should the application for a change of use from a C3 dwelling house to sui generis holiday let be permitted.

Our client objects to the change of use for the reasons below.

Inappropriate unsustainable development under the 2003 Local Plan

Policy GEN5 required 8700 new dwellings to be built within the district by 2011. Although this policy is now out of date, the Council still cannot show a five year housing land supply. In view of the Council's failure to make a five year housing land supply available, existing dwellings should not be converted and therefore lost from the housing supply already available.

Policy GEN32 provides that development which is a potential source of significant noise pollution will not be permitted ... the holiday use of only part of Brooklands has been the cause of many complaints by neighbouring residents. Should the property be converted fully for holiday use only, the noise pollution will increase to unacceptable levels.

Policy GEN3 provides that outside the built-up area, the countryside will be safeguarded for its own sake. The conversion from a dwelling house to sui generis holiday lets would not be in accordance with this policy.

Emerging Local Plan

Page 26, paragraph 3.37 of the Emerging Local Plan states that over the next fifteen to twenty years, Arun District Council will accommodate significant new housing to meet its

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own local needs and targets. As before, the removal of a dwelling house will not assist in working towards the augmentation of the provision significant new housing.

The conversion from C3 to sui generis holiday lets will not create any new jobs, nor carry other benefits related to it.

The application includes fourteen car parking spaces. The local roads are narrow and access for a further fourteen vehicles with an anticipated eight movements per day per vehicle is simply not sustainable.

The Emerging Local Plan attempts to promote strong, well-integrated, cohesive communities in order to deliver an enhanced quality of life to all. The conversion of a C3 property to sui generis holiday lets will not result in a cohesive community, nor will it enhance the quality of life of the neighbouring residents. There are only some six houses in the locality and the holiday lets would be simply over-powering, thereby completely changing the character of the area.

The proposed development is contrary to Emerging Policy SD SP1 (Sustainable Development).

The proposal will not secure development that will contribute to the social, economic and environmental conditions. It will not achieve an increase of employment density. In any case, the adverse impact of granting the proposed development would significantly and demonstrably outweigh any benefits that may be provided by the proposed development.

The proposed development would be outside the settlement boundary. The Emerging Local Plan aims to protect the countryside. The proposed development would negatively affect the current residents and, in the absence of material considerations to the contrary, should not be granted.

The proposed development is contrary to Policy CSP1 as the proposed development is not for the operational needs of agriculture, horticulture, forestry, nor for the extraction of minerals, nor for the management of waste. It is not for quiet informal recreation nor green infrastructure, nor for the diversification of the rural economy nor for road and/or cycle schemes. Nor is it in accordance with other policies in the Local Plan.

As such, to grant the proposed development, the Council would fail to protect the countryside as an important resource in its own right, and the Council would fail to meet its aim of sustainability by locating development in areas with existing services, infrastructure and facilities.

Although the proposal appears to be for holiday use, owing to its location and distance from tourist attractions and other facilities, there will be a heavy reliance on the motor car, and it would be very unlikely that tourism and recreation in the area would be strengthened owing to the provision of this holiday accommodation.

Although the proposed development would not create any employment, even if employment were created, the conversion of the property would still remain unacceptable and unsustainable in planning terms as outlined on page 83 of the Council's Emerging Local Plan. The conversion of rural buildings outside of the built-up area for, among others, business use would only be permitted if the resulting building use would not have an adverse effect on the rural character of the area, and where the traffic to be generated by the new use can be safely accommodated by the site access and local road system. As

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stated above, the resulting building use will have an adverse effect on the rural character and amenity of the neighbouring properties. Further, the traffic generated by adding an extra fourteen cars on to the local road system cannot be safely accommodated.

The proposed development would therefore fail to achieve the Council's policy outcome, that is, to achieve a prosperous economy.

As outlined above, the proposed development will not provide sustainable tourism and a visitor economy. It is therefore contrary to policy TOU SP1 as it will not encourage long-term visitor interest or activity, nor will it provide a viable visitor economy or extend the visitor season, nor will it provide a benefit to local people. The property is so remote that access to visitor attraction facilities is not easily achieved.

The proposal is contrary to Policy TOU VM1 as the proposal is not likely to attract visitors and the proposal cannot demonstrate that it is indeed in an accessible location.

Policy TOU VM1 further sets out that with development outside the built-up area boundary, although it can play an important role in rural diversification, it is necessary to balance the provision against the need to safeguard the landscape, character and environment of Arun. The proposed development of Brooklands will adversely affect the character of the area and will damage the amenity of the immediate neighbours.

The proposed development which caters for at least fourteen parties is not small scale and does not relate to the quiet informal recreation and enjoyment of Arun's countryside. It is not an appropriate large scale facility as it is not associated with enhanced visitor use or appreciation of a specific feature or location.

There is nothing in the application that demonstrates that this facility is required in this location, nor indeed that it is sensitively designed to minimise the potential impact on this location.

National Planning Policy Framework

The NPPF, paragraph 7, promotes a strong, healthy and just society and promotes sustainable development. As shown above, as the proposal for Brooklands does not provide any employment, or any access to a specific attraction or landscape, there are no material considerations for grant of the proposed change of use.

In fact, there are many considerations that show that the proposed change of use will result in an unsustainable development. The proposed change of use is located in a remote location which is not accessible by public transport, or by walking or cycling. Those visiting the development will rely on the private motor car. The road network will not be able to cope with the vehicle movements relating to a tourist use for the extra fourteen cars that could be accommodated as part of the development.

Conclusion

The proposed development negatively affects the amenity of the immediate neighbourhood. There have been many complaints about the holiday use in only part of Brooklands. It is reasonable to conclude that the complaints will increase once supervision of holiday-makers has disappeared from the site.

Therefore, in the absence of any considerations that would propagate the grant of planning permission from C3 use to sui generis (holiday use) this application should be refused.

Should you have any queries or wish to further discuss this letter, please contact the writer, Larissa Lowe, whose contact details are below.

Yours faithfully

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Thomas Eggar LLP

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