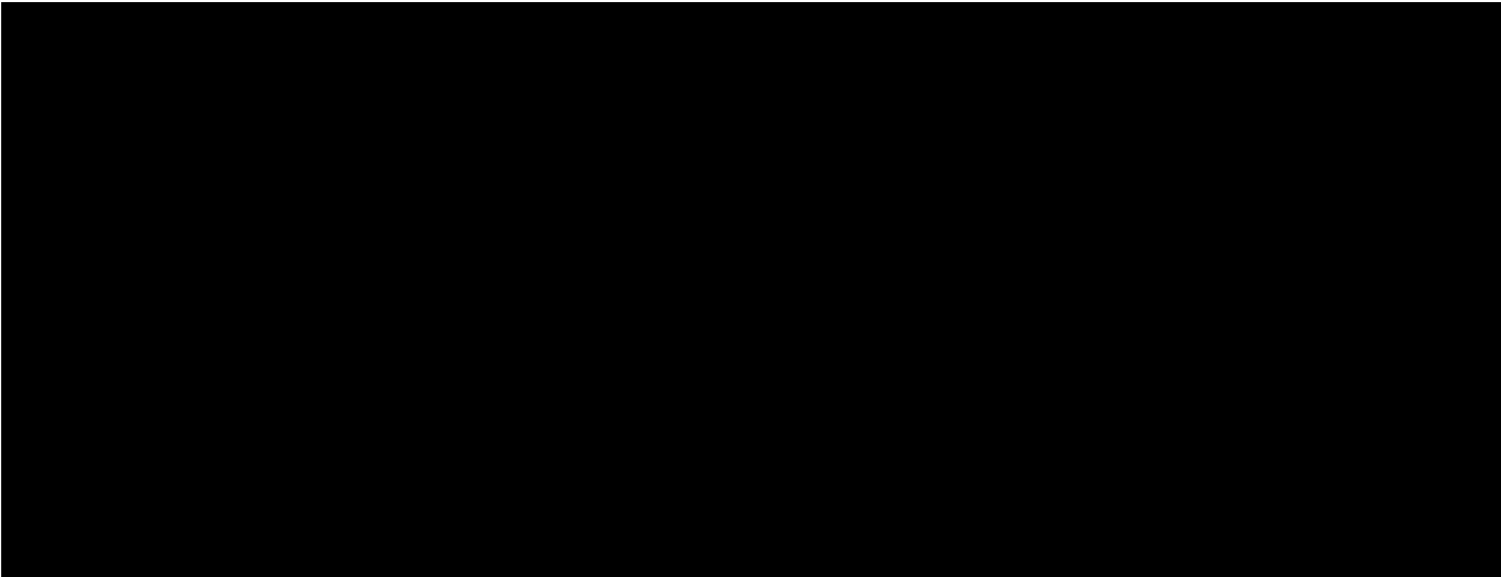
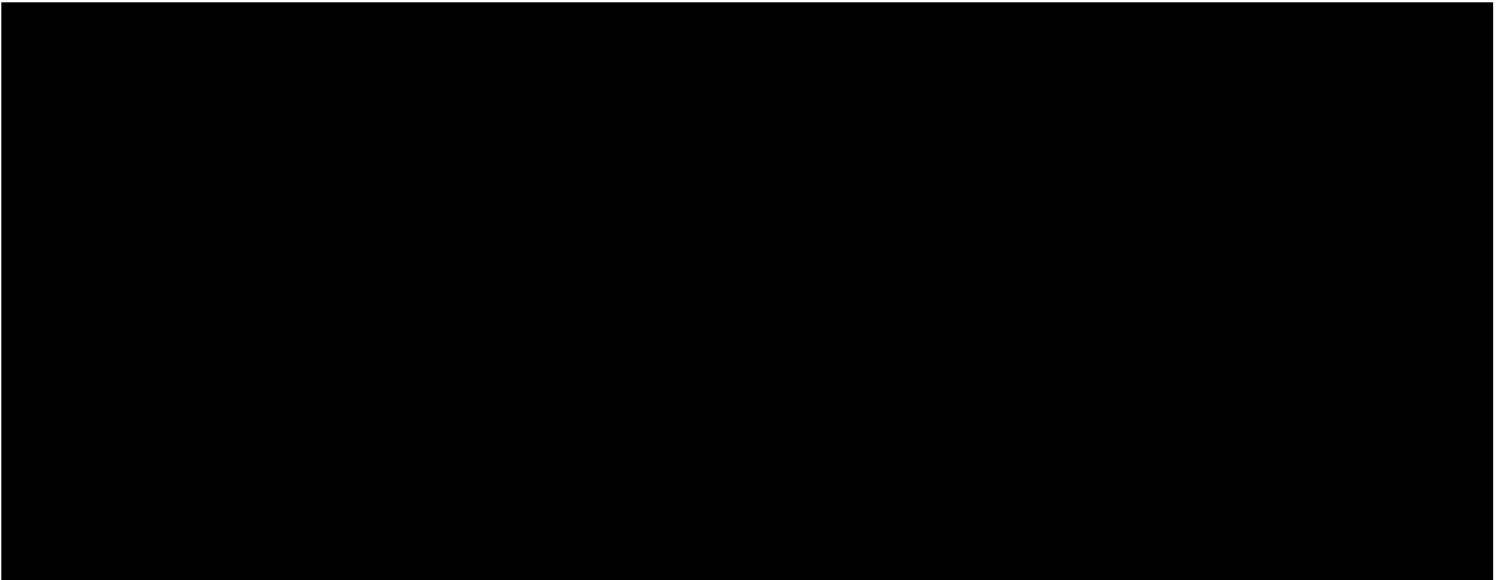


From: Angela Broughton [REDACTED]
Sent: 26 March 2017 17:24
To: Lucy Harding
Subject: Council Ref: Y/1/17/OUT

SUPPLEMENTARY OBJECTION - Angela Broughton. Elm Barn.

**OUTLINE PLANNING APPLICATION FOR 56 DWELLINGS AND NEW
ACCESS AT BONHAMS FIELD, YAPTON BN18 0DX**

Council Ref: Y/1/17/OUT

Further to my previous objections to this planning application, I have now had the opportunity to review the District Council's recently approved planning documents, including the Main Modifications to the Local Plan (March 2017), the Sustainability Appraisal to the Main Modifications (February 2017), and the Housing Implementation Strategy (March 2017).

These documents provide further evidence to support my objection, and they also provide the Council with additional sound and robust arguments to refuse the submitted planning application, and defend that decision at a planning appeal if required.

I have also had the opportunity to review the Council's written pre-application advice for this proposed housing development, dated 29 July 2016.

As previously stated the District Council is under a legal duty to determine planning applications "in accordance with the Development Plan unless material considerations indicate otherwise."

The Council's pre-application advice quite clearly states that "the proposal does not comply with the development plan", but that there are "material considerations that would justify a recommendation to approve", as it "would not be contrary to the core principle within the NPPF."

There are 12 core principles within the National Planning Policy Framework (NPPF), but the "golden thread" for decision taking is stated to be "a presumption in favour of sustainable development", unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted."

It is worth noting that the Council's pre-application advice fails to highlight the national planning policy requirement and exception relating to "adverse impacts" in its letter.

The pre-application advice sets out three main reasons why “other material considerations” could be given more weight than the approved Development Plan when making a decision on this application.”

First, that the District Council is “unable to demonstrate” an adequate 5-Year supply of deliverable housing land, as required by paragraph 49 of the NPPF. It is stated that the Objectively Assessed Need (OAN) figure “has been increased to 845 units per annum as of 3 February 2016”, and therefore insufficient sites to meet this figure have been identified and allocated for housing use within the District as a whole.

Secondly, that the site can be “viewed as a sustainable location for housing” as the proposed housing adjoins “the built up area boundary”, “has a positive relationship to the built up area to the north, east and west which have existing and proposed residential use” and is “located within a well contained site and subject to mitigation”. There are also “many amenities and services” that are “within a reasonable walking distance”, and “there are regular bus services along both Main Road and North End Road”, making the site “appropriate for walking, cycling and public transport links”.

Thirdly, that the proposed scheme is considered to be a “sustainable development”, and that community benefits (eg. affordable housing) and any necessary mitigation of harmful impacts (eg. infrastructure payments) can both be secured through a Section 106 Legal Agreement, and also through detailed design and planning conditions.

Housing Need and Land Supply

I believe that the emerging Local Plan (eLP), including the Main Modifications to the Local Plan and the Housing Implementation Strategy, now makes provision for an Objectively Assessed Need (OAN) housing land supply of 960 dwellings per annum for the Arun District, which is higher than referred to in the pre-application advice.

However, in the recently agreed planning documents, the District Council has now demonstrated that this housing need and target can be met without the proposed housing development on Bonhams Field. It is made clear that the Parish of Yapton will be required to accommodate further housing in addition to existing completions and allocations, but the new

evidence demonstrates that there are preferred alternative Strategic and other housing sites in and around Yapton that are deliverable and will contribute to meeting the above housing land supply requirement.

There is also a recognition that neighbourhood planning authorities in the Arun District should be given sufficient time to modify existing ‘made’ Neighbourhood Plans to accommodate these greater housing numbers.

The ability to shape plans to meet the needs of local communities is a basic principle behind the Government’s neighbourhood planning programme, and this should not be undermined by giving premature housing approvals on sites not allocated for housing.

I also understand that the Government’s new Permission in Principle (PiP) regime, which becomes operational on 1 April, also encourages preferred new housing sites to be identified in Local Plan documents, and this should hopefully reduce the number of speculative housing proposals on other sites.

Bonhams Field as a Sustainable Location for Housing

The Council’s pre-application advice states that the proposed housing is next to “the built up area boundary” of Yapton, but what this actually means is that it is OUTSIDE the existing built up area and boundary. Also, the site has NO “positive relationship to the built up area to the north, east and west which have existing and proposed residential use” as claimed – there is no built up area to the west, as it is primarily open countryside, as is most of the area to the north. I am not sure what is meant by it being a “well contained site”, as this is not explained.

The Council’s Sustainability Appraisal of the Main Modifications to the Local Plan and the Landscape Capacity Study (2017) both provide evidence which suggests this site is in a “substantially sensitive” area, with “low capacity for development”, and that there would be significant negative impact on the open and undeveloped character of the landscape if new development was allowed.

The site has a distinct rural character and appearance and provides a clear physical separation and gap between the two built up boundaries of Yapton and Barnham, with views across open countryside.

Development on this site would be a serious encroachment into the countryside, reduce this gap, and likely result in an incremental coalescence of Yapton and Barnham as currently two distinct settlements, contrary to Local Plan and Neighbourhood Plan objectives and policies. It is one of the last remaining countryside breaks between the two settlements, and contributes enormously to their rural character and setting.

There is some evidence that the village of Yapton could be considered a sustainable location for some new development, but this particular site at Bonhams Field is outside the built up area and village settlement boundary, not at all well connected or integrated to the main village amenities and services, and surrounded on three sides by open countryside, and is therefore NOT in a sustainable location.

As regards “regular bus services”, there are actually only 8 buses a day Monday to Saturday on the Number 66 route through Yapton to Barnham and Bognor Regis (no service on Sundays and Bank Holidays), which is less than one per hour so this could be considered to be infrequent as well as regular. The service is often poor (running late).

Sustainable Development and Adverse Impacts

The proposed housing scheme is NOT a sustainable development as claimed, and it is clear that there would be adverse impacts that would significantly and demonstrably outweigh any identified benefits when assessed against the policies in the NPPF as a whole, and that these could not be satisfactorily mitigated through a Section 106 Agreement and planning conditions.

It is certainly possible that the absence of spare capacity in local GP surgeries, and in the local Primary School, could be overcome through increased investment in new and expanded services, funded through a S106 Legal Agreement, although there could well be a gap of some years between the additional demand coming on stream and the additional supply being put in place.

It is also possible that the lack of spare capacity in the foul water network could be dealt with through a planning condition and direct negotiations with Southern Water in order to avoid wastewater flooding and foul water discharges.

It is also possible through good design and planning conditions to minimise adverse impacts on local amenity, including visual impact, overlooking, loss of privacy, loss of openness, noise, and light glare/pollution – nevertheless the current illustrative layout and design completely fails to avoid such harmful impacts on neighbouring properties.

HOWEVER, it is NOT possible through legal agreements, planning conditions and good design to completely mitigate the substantial harm to local heritage assets from this proposed housing development.

The proposed development will totally spoil the rural character of the western entrance to the Main Road Conservation Area and the village of Yapton, and the existing open views to the Farm and Downs will be lost forever.

The scheme neither protects nor enhances the special character of the Conservation Area as required by planning law.

The District Council's Conservation Areas Advisory Committee and its Historic Buildings Advisor are both quite rightly objecting to the proposed development because of its significant adverse impact on the character and setting of the Conservation Area as a whole, and on the setting of a number of Listed Buildings, including my own property at Elm Barn.

One of the reasons Elm Barn is listed as of architectural and historic merit was due to the fact its countryside and farmland setting reflected its previous use. Its relationship with the landscape is "intimate" according to the Council's Historic Buildings Advisor. To now surround it with a modern suburban housing estate seems to be particularly inappropriate, incongruous and harmful to its protected status.

The Council's Historic Buildings Advisor correctly raises issues of the change to the experience and appreciation of all the affected Listed Buildings if they were in a completely new setting. He also raises serious concerns about the out-of-character 'Poundbury-style' suburban nature of the proposed development, in terms of scale, density and design, which does not integrate at all well with its rural village location and context.

It should be noted that the applicant has provided no illustrations of the impact of this suburban intrusion into the views of the Conservation Area as you enter the village from the west, in particular showing the visual impact on the listed barn and farm house.

It should also be noted that the Council's pre-application advice was provided on the understanding that the applicant was "intending to submit a full planning application", and it advises "that there will be a requirement to provide a detailed and full application" to assess potential impact and harm on heritage assets. The applicants instead only submitted an outline application, with the scale of the development and access as reserved matters. Why then was it accepted and validated by the Council?

It is also not possible through legal agreements and planning conditions to mitigate the substantial harm caused by the loss of productive and sustainable Grade 1 Agricultural Land, which provides an important high quality grazing area for livestock for more than 6 months of the year.

The proposed development is contrary to Policy E1 in the Yapton Neighbourhood Plan, which restricts loss of Grade 1 or Grade 2 Agricultural Land unless it is specifically allocated for housing in the Development Plan, which it is not. The Council's own Sustainability Appraisal has an objective to "avoid the loss of best and most valuable agricultural land", so the loss of this land is therefore not sustainable.

I would like to specifically challenge para 6.2 of the applicant's Agricultural Assessment document prepared by Bruton Knowles. This states that: "the area of land, when considering all factors of a modern arable enterprise or stock management, that the land cannot profitably be cropped or grazed by the owner/occupier". This statement has been provided with absolutely no sound and robust evidence to back it up. If required the tenant farmer can provide information to prove otherwise.

Conclusion

In conclusion, and as previously stated, the proposed development is not in accordance with the adopted Development Plan, and this is acknowledged by Planning Officers in the pre-application advice.

The question, therefore, is whether there are other exceptional material considerations which indicate that the planning application should be approved. There are not.

The proposed development does not comply with the planning policies in the emerging Arun Local Plan (the Main Modifications to the draft Arun Local Plan).

Bonhams Field is not identified as a preferred housing site in the emerging Arun Local Plan and Housing Implementation Strategy.

The proposed development on this site is not identified in the emerging Local Plan and Housing Implementation Strategy as being required to meet the OAN deliverable 5-Year or 15-Year Housing Land Supply requirements of the District.

The proposed development conflicts with many of the core principles of the NPPF.

The proposed development is, therefore, not a sustainable development, and nor is the site in a sustainable location.

Even if it were to be considered a sustainable development, it is clear that there are considerable adverse impacts that significantly and demonstrably outweigh any benefits when assessed against the policies in the NPPF taken as a whole

The District Council must, therefore, refuse this planning application.

Angela Broughton

Elm Barn

26 March 2017