

The Potting Barn  
No.5.Hobbs Court  
Bilsham Rd.  
Yapton  
West Sussex  
BN18 OJY

Sept 16<sup>th</sup> 2020

**Second objections to later additions by the applicant/agent.**

Dear Mr. Davis,

As records will confirm, I submitted my initial objections to the outline planning application for Y/70/20/ OUT on Aug.18<sup>th</sup> 2020. This was made on the details and documents presented for public review by *Critchley Architecture and Design Ltd./ their agent* in their application submitted on 11/8/2020 as understood to be containing the application details.

I am forwarding additional objections, in relation to the further substantive documents submitted by the applicant/agent *after* the original submission on Aug.11<sup>th</sup> 2020. In particular, I draw attention to:

Contamination Report,10/9/2020, Heritage Report 10/9/2020 , Flood Risk Assessment,8/9/2020, GeoSmart-Sudsmart Pro,3/9/2020,Applicant photos,3/9/20,Soils Sustainability28/8/2020.

It would appear that these and others not now listed, form a main part of the application and whether later inclusions are permitted or not, are felt is a cause for concern.

1. **I object**, that these documents were not submitted by CAAD Ltd/agent, at the same time as the other main documents, for everyone to review at the outset, and to enable any objections to be made in respect of a *full* set of submission documents at that time.
2. **I object** on the basis, that if it was thought necessary to make adjustments/additions to earlier documentation on which any applicant may rely, (Flood report V2 for example) that there is also an opportunity to withdraw the application and reapply with a full set of documents for all to review as a whole at a later date, which has not apparently been done.
3. **I object** that although additions may be permitted by an applicant during the review period, it may also appear to call into question why such apparently important documents were not provided in the first place.
4. **I object** that because of item 3 above, that it may appear that those already making an objection were not fully able to do so from the outset. It is understood that it should not be felt necessary to wait until the final days of an application timeline to see if anything may be added , before being able to comment in full.

**Objections to the additional information supplied after the initial application:**

**The Heritage Report Document**

**1.0 Generally**

1.2 To seek to avoid any difficulties regarding 'copyright' as referred to in the report, it is acknowledged that it has been submitted by Critchley Architect and Design Ltd. for public

review and comment, which apparently includes extracts from the NPPF document and other. Detailing in this response now from the NPPF document is attributed and notated as follows in italics and those of/through CAAD Ltd. will be in quote marks.

Attributed to NPPF document and highlighted in text by CAAD Ltd:

**a) *The level of details should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.***

The next sentence goes on to say, but not highlighted in text by CAAD Ltd.

**b) *As a minimum the relevant environmental record should have been consulted and the Heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit a desk-based assessment and, where necessary a field evaluation.***

**I object** under item 1.2 (b) appears not to have been addressed further than perhaps a limited desktop survey, or before more in depth and further details had been obtained regarding the historic and archaeological nature of the whole area as appears to be recommended.

1.4. The report states: 'There are no listed buildings within the application site'.

**I object** on the basis that there is an apparent 'dismissal' of properties which are adjacent to Hobbs Farmhouse and the whole Grade II listed area of Hobbs Court, and would appear to fall within consideration under item (b) above.

1.6 **I object** because it is stated that, 'There is only one Listed building within 200m of the application site'. It is understood that this is intended to refer to Hobbs Farmhouse. This appears to be incorrect.

If perhaps a field study had taken place as apparently recommended in the NPPF document, then it would have confirmed also, that another listed property is attached to Hobbs Farmhouse, and another attached to that. 3 properties are linked in this way and Grade II listed. 2 are part of 6 properties at Hobbs Court, all of which are Listed too. Also, forming part of the set of farm buildings, at one time attached geographically and historically as well, to Hobbs Farmhouse, and before becoming separated to form Hobbs Court.

Previously the properties were also part of the Craft Centre. Both the farm and Craft Centre are understood to have ceased to operate in approximately 014/015, when the barn conversions commenced.

## **2.0 'Drawing Schedule'**

### **'Maps'**

**I object** on the basis that a map indicated as being from 1970 where it states: 'The Northwest corner of the application site is very much as it can be seen today'. Whereas that may refer to the site specifically then, it appears to ignore the immediate surroundings/ farm buildings that have all had to be approved for building re-construction and alteration by Planning, Conservation and Heritage, and before any adjacent development was able to take place since at Hobbs Court in the last 6 years.

**Also in objection** under 1.6. At the time this development commenced, it is understood, that Little Meadow would have been made aware of any proposed alterations, at the time of the

application plans for development there. That property is understood was not excluded in terms of consideration as being 200m from it then (or less), even though it is not understood to be a listed building.

**I object** that the latest maps included are not indicative of the area today and is not representative of the significance of the historic area of the Bilsham as a whole, also including Listed property in Bilsham Lane.

## **6.0 'Historic Context and Development'**

**See also above comment and objection under 2.0 above.**

## **7.0 'Significance'**

**7.1 I object** that the *whole* environment has apparently been sought in part to be excluded. Hobbs Farmhouse is not the only building of historic interest in the area that may be affected by the proposed development as above, including from a proposed extended industrial site and any detrimental and adverse environmental outcomes that would ensue.

**7.2 I Object** to the apparently limited reference to the history of the Farmhouse area as quoted, because apparently, 'Historic England' may not have much detailing about it', on the basis that such a comment is apparently inconclusive.

More extensive research would reveal the history of Yapton and Bilsham going back to the Domesday Book and early Saxon developments. The Farmhouse itself is noted as dating from 1751, in its original form. There are understood to be many readily available sources of further information, from which to make a more thorough investigation.

**I object** to an apparently subjective view submitted, that the Grade II listing of the Farmhouse should apparently be 'considered' to be re-assigned, as to be of Architectural Interest rather than with its official and existing listing. **I object** that such a comment is not backed up by any authorising body or accompanying evidence and is therefore considered non sequitur.

Also, perhaps a good source of reference, may be the Yapton Historic Society, who may also have relevant details about the area and Farmhouse in a timeline, between the earlier Medieval/Saxon times and 2011. As stated, the Farmhouse is recorded as being in existence in 1751, and many adjacent buildings from the 1800s too. For that reason, their historic interest would appear to be their age and continuing existence, which afforded the Grade II Listing.

## **8.0 'Impact'**

**8.2 I object** to the claim that, 'Any proposed development is over 165m away from Hobbs Farmhouse, and is not within the curtilage and cannot be seen to/from the Listed building'.

**I object** that the reference to 'curtilage' apparently being referred to as definitive at this time. As 'curtilage' is something understood of a contentious subject in generality, I also object to such a statement being made before any evidential documentation has been presented to back it up.

The Farmhouse 'property' is not limited to its physical nature. There is a significant area of land surrounding it. There is also apparently a 'joint' entrance to Hobbs Farmhouse and Little Meadow. Changes in ownership and boundaries are also understood to be taken into consideration over time regarding 'curtilage issues', where apparently even the High Court has been sought to resolve them.

**I object** to the claim that the proposed development ‘could not be seen from the Farmhouse’, as it is considered to be speculative at this time, unless it is possible to confirm that the occupants are unable to see further than 165m/200m in generality.

Also, in relation to Physics, and the ‘Law of Refraction’, which allows for the bending of light due to the refraction of the atmosphere, in respect of the geometric horizon as apposed to the optical horizon, and allows for an additional view of 11% over and above the geometric horizon. Additional viewing height also increases this distance. Information source: Electronic Aids to Navigation: Radar and ARPA, authors R. Lownsborough I. Eng.F.I.E.I.E, M.R.I.N. and D. Calcutt. MSc., C.Eng., M.I.E.E..... ISBN 0-340-59258-3.

It is also noted from the black and white photographs submitted, that they appear to have been taken during a time when foliage density was more prevalent and more screening was apparent, and therefore not apparently a year- long view of the site.

Information may also perhaps be noted from Bill Bryson’s book, ‘Notes From A Small Island’, where it quotes:

“ That between 1945 and 1990 England lost 96,000 miles of hedgerows- enough to girdle the Earth four times.....between 1984 and 1990 and even though government funding had been withdrawn towards digging them up, another 53,000 had been torn up.....at least half the hedgerows in Britain pre-date the enclosure movement and perhaps as many as a fifth date back to Anglo-Saxon times.....they are a central part of what makes England, England. Without them it would be Indiana with steeples.”

As the whole area dates back to Anglo Saxon times, **I object** to the reference regarding their proposed removal, (even in part) and before more thorough investigations have taken place in respect of their present significance both historic and ecological and of the entire site.

I confirm that my own property has adjacent land to the Farmhouse, and I also confirm that I am able to see further than 165/200m to the East and South where the proposed site is apparently to be located. Additions to the industrial site are understood will be able to be seen too. So far as distance is concerned, I am also able to see beyond my own property boundaries further than the distances quoted to the North as well.

## **9.0 ‘Conservation Principles’**

**I object** to the arguments in this section that appear to suggest ‘advantages’ regarding the development (NPPF document), as the details provided in that section do not appear to support the intended development, as apparently indicated by the applicant/agent that they do.

### **‘GeoSmart Plus’ Objections**

1. The number of residential properties are incorrectly listed. The application states 81 dwellings and 18 self- build. The latter is omitted in the report and stated as 81 only, ( the other 18 are only indicated in a map reference).
2. The report defines that the content is a desk-top survey, and also relies on details supplied by the applicant/agent rather than an independent field survey.
3. The report is confirmed within as being a ‘watching brief’ only and is understood cannot be relied upon as definitive and without further research.
4. The property adjacent to the proposed development is Hobbs Farmhouse and has not been Bilsham Farm for many years. There is another of that title elsewhere as acknowledged. The

reference to 'neighbouring properties' does not mention the adjacent and in parts attached properties to Hobbs Farmhouse or acknowledge the Grade II Listed status of it or them.

5. 'Not environmentally sensitive areas within 500m of the site', is considered subjective until independent surveys have been done in respect of flora and fauna, as well and more conclusive Heritage details. There is no mention as yet of bats in the report for example, which had to be acknowledged in the area regarding the Hobbs Court site when under construction.

#### **'Flood Report 'V2' ' Objections**

I refer to my objections (Aug18th 2020) to the earlier Flood Report, which advised that further detailing should be obtained from the local authority as it was only a desktop survey. This would seem to be necessary and also for a field survey, as the company who prepared the present survey are apparently located in Shrewsbury.

The reference that apparently Arun did not supply details when requested is also perhaps considered misleading. It would appear that details *are* readily available for those willing to pay for a local authority service/searches to provide them.

The survey advises that it is only in connection with the site itself, but the diagrams appear to include a wider area of investigation. As such, I object on the basis that as yet, no survey and as confirmed in the latest report, has apparently been done to assess the water table level, and how that may impact on the surrounding areas by its possible displacement due to the development itself.

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#### **Summation and recap of overall objection.**

\*Every applicant/agent is understood to have the opportunity to prepare and supply ALL the relevant details regarding a planning application, on which they may intend to rely, at the outset.

\*I believe that anyone wishing to make an objection should be able to rely on that fact too.

\*It is understood that although an extension of time for preparation was refused, and further detailing was agreed to be accepted, it is concerning that documentation has been added, approximately *one month later*, and *after* many objections have been lodged to the earlier submissions.

\*It is accepted that it may be inadvertent in outcome, but it also may appear that the applicant/agent may have had the opportunity to 'review' and 'address' the original objections and apparently 'in advance' of any planning meetings where any objections would have been anticipated to be discussed instead, and outcomes pursuant in result.

\*It is understood that the opportunity is available for anyone to resubmit any application and include any additional details in such an eventuality, and where all the documentation could be supplied at the same time, and so that any objections could relate to an entire submission, in fairness to all, whether by submissions, objections or subsequent planning appraisals.

Yours sincerely,

Dilys Lownsborough