

OBJECTION PART 1. CONSERVATION AND HERITAGE ISSUES

I am writing to object to the current full application for residential development on Bonhams Field, comprising 75 housing units, which is an increase of 19 housing units over the 56 units granted outline permission on 7 December 2017 (Y/1/17/OUT).

My objection is to the development as a whole, and not just to the desirability and impact of a 35% increase in the number of proposed housing units compared to the outline permission.

The Council must determine this new application in accordance with the Development Plan and all other material considerations. A number of material considerations have changed since December 2017, and these were deliberately and specifically not taken into account when the Reserved Matters application was approved on 21 February 2020 (Ref: Y/63/19/RES).

A number of important planning circumstances and considerations have changed since December 2017, and these must be fully assessed and evaluated as part of the consideration of this application. The Council must therefore address all the varied planning issues which arise from this fresh planning application, including the principle of housing on this site outside the village boundary, the detailed design and layout of the proposed scheme, its impact on the Main Road Conservation Area and on Listed Buildings and other nearby heritage assets, the traffic impacts on Main Road and the local road network, and the loss of important countryside and Grade 1 agricultural land.

It is also important to note that the outline planning permission previously granted has not yet been implemented, and there are a number of pre-commencement planning conditions still outstanding which need to be discharged before any implementation works can start. It should not be assumed that these planning conditions will be discharged to the satisfaction of the Council in the near future.

It is my view that the substantial harm and adverse impacts from this proposed development to heritage assets, to loss of countryside and agricultural land, to residential amenity, and to maintaining an efficient and safe local road network significantly and demonstrably outweigh the housing benefits of this development on a site with no residential designation in the adopted Development Plan documents (the Arun Local Plan and the Yapton Made Neighbourhood Plan).

In this objection, I will focus on the unacceptable impact of the proposed scheme on local heritage assets, on the character of the Main Road Conservation Area, to Listed Buildings within the Conservation Area, and to their setting, and to the failure of the scheme to demonstrate sufficient mitigation to the level of harm that will be caused.

The proposed development fails to preserve and enhance the character of the Main Road Conservation Area, as required by planning law, and fails to protect the special architectural and historic character of the Listed Buildings within the Conservation Area.

My property, Elm Barn has been Grade II Listed since 1994 (referred to as Bonham's Barn), and the listing description states: "An intact mid C18 barn reusing some earlier timbers with two attached early lean-to's, one a cart shed the other reputed to have been a horse-powered engine house for threshing corn. It has group value with the former farmhouse."

Both the adjacent farmhouse building (also Listed Grade II) and the barn have an intimate agricultural connection with Bonham's Field historically and aesthetically, and the loss of this intimate farmland connection and setting causes substantial harm to these two Listed buildings on the western entrance to the village. To surround them with a modern suburban housing estate seems to be particularly inappropriate, incongruous and harmful to its protected status.

The applicant's own Heritage Statement acknowledges that the site and its relation to Elm Barn has "existed in its current form since at least the eighteenth century" and that the "barn would have been associated with the adjacent farmland and this setting has remained unchanged for a long period of time." However, it still mistakenly refers to it as early C19 despite the official listing description.

The proposed houses closest to Elm Barn are two-storeys with hipped roof, and they stand on significantly higher ground, so they will dominate many views of Elm Barn and the Conservation Area, particularly as you enter the village from the west.

The image below from the submitted drawings gives an indication of the scale of the new housing against Elm Barn as viewed from Main Road, but does not take account of the higher ground on which they will be standing. These houses should be single storey, or at least not higher than the ridge of the highest part of the barn.



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 to illustrate the likely visual impact on the listed barn and farm house from that viewpoint.

The Council's Senior Historic Buildings Advisor (Ian Wightman) and its Senior Conservation Officer (Martyn White) both objected to the currently permitted scheme, and to its unacceptable impacts on the Conservation Area and on the Listed Buildings in the vicinity, and stressed that this harm must be given "great weight" as established in case law.

They both stressed the intimate connection of the Listed Buildings with the existing landscape and farmland, and that this historic setting had hardly changed for centuries and would now be lost forever. The proposed small wildflower buffer zone next to Elm Barn hardly compensates as a suitable setting for the loss of acres of farmland as far as the eye can see.

Both Council experts were very concerned at the suburban and 'Poundbury-style' scale, density and design of the development, with use of standard modern houses which are unrelated to local character and materials, and which fails to integrate into "the existing built form and historic grain" which is semi-rural in nature. They state that the impression is of a modern housing estate and not a characterful village extension.

They were also concerned at the existence of buildings on the entrance to the proposed new housing development which would be viewed on the western entrance to the village and Conservation Area. There was a suggestion that if these buildings were removed the housing layout would need to be amended such that more houses would be closer to the northern boundary of Elm Barn. This is a rather strange argument, since an alternative solution would have been to just reduce the number of houses in total from 56 to 52, and keep the very visible Main Road frontage completely clear of new modern houses.

The proposed development has now increased further in scale and density, and the layout and form of buildings closest to Elm Barn is still unacceptable, and therefore I object again to its appropriateness in this context and setting. I consider the current proposal causes substantial harm to local heritage assets.

However, even if it is considered that less than substantial harm is caused, case law does not allow the decision-maker, in deciding whether that harm would be outweighed by the advantages of the proposed development, to give the harm such weight as they think appropriate.

My understanding is that a finding of harm to a heritage asset is a consideration to which the decision maker must give considerable importance and weight in carrying out the balancing exercise, in accordance with S66(1) of the Listed Buildings Act 1990.

There is therefore a "strong presumption" against granting planning permission for development which would harm a heritage asset. In the *Forge Field case* (*Forge Field Society & Others v Sevenoaks DC & Interested Parties* [2014] EWHC 1895), the High Court explained that the presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. But a Local Planning Authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation (of the heritage asset and its setting), and if it demonstrably applies that presumption to the proposal it is considering.

There is no compelling evidence to support the applicant's conclusion in their Heritage Statement that "the development will continue to reflect the prevailing character of the heritage assets and will blend into its surroundings" and that its impact on the heritage assets remains negligible".

In conclusion, this proposed development fails to comply with Policies HER SP1, HER DM1 and HER DM3 of the Arun Local Plan which says that development likely to prejudice heritage assets, and their settings, including important views "will be refused". The proposed development also fails to comply with Policy E8 of the Yapton Made Development Plan. I would, therefore, urge the Council to refuse this planning application.

OBJECTION PART 2.

LOSS OF VALUABLE AGRICULTURAL LAND TO HOUSING AND THE LIKELY TRANSPORT AND LOCAL AMENITY IMPACTS.

This is my second objection to the current full application for residential development on Bonhams Field, comprising 75 housing units, which is an increase of 19 housing units over the 56 units granted outline permission on 7 December 2017 (Y/1/17/OUT).

My first objection dealt with heritage, conservation and design issues. This objection relates to the suitability and sustainability of this site for residential development, its impacts on the local transport network, and the unacceptable loss of valuable Grade 1 agricultural land and important local wildlife habitats.

As previously stated, my objection is to the development as a whole, and not just to the desirability and impact of a 35% increase in the number of proposed housing units compared to the outline permission granted in December 2017. It is important to note again that the outline planning permission has yet to be implemented, and that a number of important pre-commencement conditions have yet to be discharged.

Suitability and Sustainability of this site for Residential Development

While Bonhams Field currently has an unimplemented outline planning permission for housing, it is not identified as a designated strategic or other housing site in the Arun Local Plan (2018). The nearest strategic housing site designated in Yapton is the Drove Lane/Bilsham Road site (SD7), which is on the other side of Main Road, but there are also other very large designated strategic housing sites nearby, including Ford Airfield (SD8) and Climping (SD10).

There are also a large number of other recent housing developments within the village, and also a number of residential permissions outside the village boundary and outside the adopted Built Up Area Boundary in the countryside and on agricultural land, for example at Stakers Lane/North End Road.

If all these sites were developed for housing, the villages of Yapton and Ford would form part of a much larger amalgamated built up area. Indeed Yapton and Ford are now within the same very large Built - Up Boundary Zone as shown on the Arun Local Plan Proposals Map.

The cumulative impact of all these developments without the necessary social, economic, transport and green infrastructure to support them makes them totally unsustainable.

The inclusion of Bonhams Field within the Built Up Area Boundary of the Arun Local Plan is extremely regrettable, and inconsistent with the built-up village boundary in the adopted Yapton Made Neighbourhood Plan.

However, Policy SD SP2 states: “Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.”

Therefore all planning policies in the adopted Arun Local Plan and the Yapton Made Neighbourhood Plan must be taken into account, and there is no automatic in-principle support for residential permissions just because they fall within the designated Built Up boundaries.

The Council recently agreed to halt production of the Non-Strategic Site Allocations Development Plan Document, while a formal review is undertaken into all Local Plan Development Management policies. This means there is no current formal plan designation of Bonhams Field as a non-strategic housing site.

Since some of the housing and development policies in the Arun Local Plan were changed in 2017, the Council must not rely on the 2017 outline planning permission as giving support in principle to residential development as of today. The new planning application must be determined on its own merits in line with current national and local planning policies, and the significantly changed circumstances since December 2017.

While the Arun Local Plan regularly states that Yapton is a sustainable location for new development, there is a lot of evidence that would suggest that is not the case, and that Bonhams Field on the edge of the village is not the most suitable and sustainable location compared to other potential development sites.

For example, the Arun Local Plan acknowledges that many of Arun’s roads are already very congested, such as the B2233 through Yapton, and that the pressure on the local road network is likely to increase with further population growth and new development. The text says that new development needs to be carefully sited so that it minimises additional car traffic, by providing development in sustainable locations where there is access to regular and reliable public transport (paras 3.42 and 3.43).

There is no access to regular and reliable public transport from this site. The nearest railway station is over 2km to the west of the site at Barnham (a 30 minute walk), and there are limited and irregular bus services.

The sustainability of this particular site is therefore very questionable.

Impact of Proposed Development on local Transport network

The applicant’s transport assessment takes no account of the cumulative impacts of all the current planning permissions for residential development in the area and on the capacity of Main Road at peak times. It would appear to rely on the transport assessment undertaken

back in 2016 prior to the more recent 500 house permissions on Drove Lane/Bilsham Lane, a large proportion of which will be accessing and exiting from a new junction on Main Road, almost directly opposite the proposed access into the Bonhams Field development.

The submitted traffic impact assessment only measures the resulting traffic generation from the “proposed uplift of 15 units”. This methodology is flawed because (a) it should measure total trip generation from all 75 residential units; and (b) it should also measure trip generation from visitors, including the increasing reliance on delivery vehicles (parcel delivery, supermarket and take away food etc).

There is no evidence in the submitted document that gives any assurances that the proposed development will not significantly add to road congestion and danger.

It is also noted that this methodology was supposedly agreed in pre-application discussions with WSCC, but my understanding is that no official pre-application discussions and advice was provided. That is what is clearly stated on the planning application form.

The Arun Local Plan highlights the importance of reducing car and vehicle journeys, by providing better public transport services and infrastructure for safer journeys by foot and by bike. There is nothing in this transport assessment or the development proposals about improving public transport services or safe cycling measures to connect with Barnham and Ford railway stations.

The proposal therefore fails to comply with Arun Local Plan policies T SP1 and T DM1.

Loss of countryside, agricultural land and wildlife habitats

The proposed development would result in the loss of over 3 hectares of Grade 1 agricultural land. This is unsustainable and unacceptable.

The Arun Local Plan states that it is Government policy to safeguard the long term potential of the best and most versatile agricultural land in conserving soil resources, and that the planning system should protect and enhance valued soil because it is an important natural resource and vital for the production of food, and other crops.

The Local Plan also states that soil is also essential for achieving a range of important ecosystem services and functions including carbon storage, climate regulation, water filtration, flood management & mitigation, and support for biodiversity and wildlife. Soil is a finite resource, and it needs to be conserved and managed in a sustainable way. (paras 11.1.1 & 11.1.2 Arun Local Plan)

The limited positive aspects of the proposed development are not considered sufficient to outweigh the significant adverse impact on loss of important Grade 1 Agricultural Land, contrary to Policy SO DM1 of the Arun Local Plan, to Objective 11 of the Arun Local Plan Sustainability Appraisal, and Policy E1 in the Yapton Made Neighbourhood Plan.

Policy SO DM1 clearly states that high value Grade 1 agricultural land should be protected, and that new development is more acceptable in locations where it involves the loss of lower value agricultural land.

I am also very concerned that the proposed development will harm local wildlife habitats, and that it will not achieve a net gain in biodiversity, as required by Arun Local Plan policy ENV DM5.

In particular the historic hedgerow currently separating the two pasture fields is under threat and a road is driven straight through it, thereby destroying the green corridor that currently exists for a whole range of species, including bats, mice, hedgehogs etc.

Also the proposed lighting to the roads, footpaths and houses are likely to result in a large amount of illumination and spillage into the dark sky at night, which will have a harmful effect on the wildlife in general, but in particular bats, which are a protected species and which require a dark landscape to forage and roost. The current absence of artificial light is why they are here roosting and foraging in the trees and hedgerows.

In conclusion, it is my view that the substantial harm and adverse impacts from this proposed development to heritage assets, to loss of countryside and agricultural land, to residential amenity, and to maintaining an efficient and safe local road network all significantly and demonstrably outweigh the limited housing benefits of this development on a site with no formal residential designation in the adopted Development Plan documents (the Arun Local Plan and the Yapton Made Neighbourhood Plan).