THAKEHAM PARISH COUNCIL CONSULTATION COMMENTS

TO:	Horsham District Council – Planning Dept
SITE ADDRESS:	Crays Barn, Crays Lane, Goose Green RH20 2LR
PROPOSAL:	Prior Notification for Change of Use of Agricultural Building to 4no dwellinghouses
REFERENCE:	DC/24/1549
RECOMMENDATION:	Strongly Object

SUMMARY OF COMMENTS & RECOMMENDATION:

Thakeham Parish Council (TPC) discussed this application on 15.10.24 and voted to Strongly object on the following grounds;

This application shares the same site as application DC/24/1268.

TPC has previously Strongly Objected to this application and sees no reason to alter its opinion. Furthermore it wishes to note the following objection to application DC/24/1268;

There has been 10 applications on site over the years. The Original Permission being DC/21/2144. The original permission was very clear on design policies which this proposal does not follow and officer remarks directly conflict each other from application to application and departs from Class Q definitions.

The new siting and layout grossly over develops the site and by separating the houses and changing them, the square meterage expansion from 146mtr2 to 160mtr2 is an increase of 10% making the houses no resemblance to what had been previously submitted (inc DC/23/0383).

Now the location of the properties have been removed, they are 6 metres away from a Priority Deciduous Woodland which will suffer from excess light pollution from more windows and the neighbouring existing properties in Peacocks and Crays Lane will suffer light pollution at night and a loss of light during the day. Post and Rail fencing will not provide sufficient cover and tree planting to provide screening should be conditioned if approved.

Water Neutrality has yet to be clearly defined as applicant is using Boreholes and mains supply as a backup.

Who is to monitor this set up? What schemes are to be put in place? Based on HDC estimates for water consumption – the properties fall short of what they will cumulatively draw from the bore holes as each will each need to draw 926 litres per day. Therefore the per person capacity at each property is 2.7 which is not enough. Consequently, the properties will need to draw from the mains supply to top up the tank which does not meet water neutrality requirements.

Important Note:

The applicant has this application for another 4 dwellings on the same site which would only exacerbate the issues listed above across both applications. This application was previously turned down by HDC DC/20/1870 and the reasons are applicable to this application.

TPC request that both applications are reviewed by the HDC Planning committee were they can be viewed in line with each other as a gross overdevelopment of the site.

MAIN COMMENTS:

TPC recognises that the proposed site is situated on Grade 2 listed agricultural land. Building any development on this site in light of the need for increased food security, especially since the council feel that the site has not been previously marketed correctly as it was artificially annexed with boundary greenery from the main farming field. Any overdevelopment of the land would be in breach of the Thakeham Parish Neighbourhood Plan (TPNP), policies Thakeham6: Design, Thakeham9: Development in the Countryside, Thakeham10: Green Infrastructure and Valued Landscapes and Thakeham14: Soils.

Several mature trees along the southern boundary of the proposed access route, growing out of the southern bank of the ditch proposed for culverting, are protected with TPOs. The applicant does not propose their removal and suggests that they will be protected, but Council submits that these intentions cannot be delivered.

It is firstly unclear how a substantial road-bearing culvert can be inserted in this ditch without causing substantial damage to the roots of these trees. Even if this was achievable, once a culvert is in place it will cut these trees off from a main source of water. Thirdly, these trees grow outwards (northerly) to overhang the proposed access road, and their lower main branches are low enough to be damaged by tall vehicles.

TPC has had previous issues with existing flooding on the B road at the proposed entrance being worsened by culverting is missing. It is referred to in 4.2.3 of our previous response DC/22/0080 (T/22/03).

Insufficient information has been provided to demonstrate with a sufficient degree of certainty that the proposed development would not result in any adverse impacts upon the habitats or roosting features of bats, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

Council therefore submits that the proposed culverting of this access track cannot be compatible with the protection of these TPO'd trees, and that it would be scandalous to allow these trees to be damaged in pursuit of an access scheme that is subject to the numerous safety concerns above. As such TPC feel that that the proposed access road will not lead to unacceptable amenity harm towards neighbouring residents by virtue of increased levels of activity, noise, light and pollution from the passing of vehicles and pedestrians entering and exiting the site via the lane, contrary to Policies 24 and 33 (part 2) of the Horsham District Planning Framework (2015).

The initial TPC Highways assessment, and dozens of resident comments, also highlight concerns about the speeds that northbound vehicles on the B2139 are actually travelling at down Jackets Hill, as they approach the proposed access junction. The existing 30mph speed sign has to flash a majority of vehicles, and as Highways note, the applicant has not yet undertaken or submitted a proper vehicle movement/speed survey.

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Insufficient information has been provided to demonstrate with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), its duties

under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

TPC feels that there insufficient plans in place for the robust protection of the water quality of the site and that the applicant has not tested the site appropriately.

The applicant states that two bore holes would satisfy Water Neutrality requirements. TPC wishes to point out that the site has not been rigorously stress tested as these tests provided by the applicant have been done during the season when rain fall is substantially higher than in the rest of the year. Therefore the scheme does not meet Policy 9 of the LP in respect of section 5.33, 5.34, 5.36 and 5.37.

Central Thakeham remains categorised as a 'small village' in the local settlement hierarchy, which carries with it the clear implication of limited scope for further housing growth. Community assets recently gained via the Abingworth development have only raised central Thakeham from the position of having virtually zero facilities, to around the district average for existing 'small village' settlements.

Serious sustainability deficits include:

- Retail facilities limited to a single small shop/café (with no scope/prospect for viable growth) – other shops and services are all at least 3km away in central Storrington.
- Education facilities (beyond pre-school) are 1.8km distant in Storrington.
- No medical facilities (other than a veterinary surgery) – nearest such facilities are all in Storrington.
- Effectively zero employment – the Monaghans Mushrooms operation is the only substantial employer (mainly of skilled pickers from outside the area) but they have just announced closure.
- Effectively zero public transport (the only return bus service to Storrington is on a Thursday)
- Poor non-vehicle connections – the B2139 is narrow, fast and unsafe and intimidating for cyclists, especially over Jackets Hill adjacent to this site, and there is no safe access to the nearest footpath.

Therefore central Thakeham residents are overwhelmingly reliant on distant facilities/services, mainly in the hub village of Storrington, and are also overwhelmingly reliant on private vehicles to get there. Vehicle journeys from Thakeham residents add to the well-known problem of traffic bottlenecks and air pollution in central Storrington.

There is also no evidence in recent years that contributions from local developments have expanded either educational or healthcare services in Storrington, which remain over-subscribed with no sign of improvement.

The applicant's Transport Strategy acknowledges the current vehicle-reliance of central Thakeham residents, yet suggests that it is unproblematic for a further 28 households to be placed in the same position going forward. It also suggests, quite wrongly, that cycling and walking links are adequate for residents of this site to access facilities in Storrington. Council considers these suggestions to be inaccurate and unacceptable. TPC concludes that the development is in breach of the Thakeham Parish Neighbourhood Plan (TPNP) policies Thakeham1: A Spatial Plan for the Parish. HDC LP Strategic Policies 1, 12, 23, 24, 27, 28, 29, 30 & 34.

TPC would like to draw attention to the comments made by HDC Housing as no mention is made of a potential affordable housing provider, and Housing Officers would urge the applicant to reach an agreement with a provider as soon as possible, to clarify and confirm tenure split, and secure funding arrangements for the affordable homes and ensure the layout and specifications of the affordable units meet the provider's requirements. Housing Officers cannot support this application until confirmation of unit sizes for affordable housing has been confirmed.

The development proposes to deliver 25% affordable homes as 1 bedroom flats – but this does not meet the needs of the community which is largely family dominated.

The positioning and size/type of the buildings that will house the flats will add to an already high densification of the site. Although the application seeks only approval for the housing layout, TPC considers the proposed density of 28 dwellings in just under 1 hectare to be unacceptable. This would be around 50% more dense than the Abingworth and Meadowbrook schemes (~18 units/ha) and adjacent housing around the Furze Common Road area (~20 units/ha). Council also notes that this high level of density leaves no open space at all for informal leisure use or visual amenity. This contravenes Thakeham Parish Neighbourhood Plan (TPNP) policies Thakeham1, Thakeham2, and Thakeham8. and Strategic policies 2 (2.2b) and 14 of the HDC LP.	
ANY RECOMMENDED CONDITIONS:	
NAME:	A.Brown (Parish Clerk)
DATE:	18.12.23