Reference: Planning Application DC/24/1681 (Lower Nash Farm / Nash Manor)

Date: 18th November 2024

Dear Planning Department,

We recently received the aforementioned planning application for the conversion of the agricultural building at Lower Nash Farm / Nash Manor to be converted into two, two bedroom Class C3 dwellings.

We OBJECT to the application raising the following concerns:-

1. Other - Class Q agricultural activity
The applicant has stated agricultural activity was taking place on or prior to the 24th July 2023 within the agricultural building. From our observations no agricultural activity was taking place either in the agricultural building or the site on or prior to the 24th July 2023.

For background: Since acquiring the site in June of 2021 the applicant created a rewilding nature reserve and left the entire site to naturally rewild with vegetation (i.e. grass, brambles, nettles, thistles etc.). This is evidenced by wooden signage adjacent to the public footpath (FP2336) which runs within the site and the applicants response letter of the 31/01/2022 within the previous planning application DC/21/2854 which stated from the fourth paragraph rewilding had commenced:-

> *"Nash is our dream forever home and we have a strong intention and desire to rewild as much of the 20 acres' as possible. If you have walked across the footpath recently you might have noticed the grass and bramble patches have been left at a suitable length to encourage ground nesting birds and smaller mammals. We are already seeing results with an increase in birdlife and the use of the grasses for hunting by foxes, owls and other birds of prey."*

2. Other - Class Q agricultural usage
The applicant has stated the agricultural building was being used for "agricultural storage" which from our understanding is not an agricultural activity as defined by the Agriculture Act of 1947 Section 109 clause (3).

We also refer to the applicants PLANNING STATEMENT document dated 21/12/2021 within the previous planning application DC/21/2854 which stated on page 2:-

> *"The existing building is used as ancillary storage for Nash Manor, as well as informal storage for cars and building materials. The building is not part of any agricultural, forestry or equestrian land holding"*

3. Design

a. Fenestration
The ethos of agricultural building conversions are to maintain the appearance of a former agricultural building. In this case the agricultural building is a large, modern, utilitarian design built in 1992 (PL/70/92) with plans to implement floor to ceiling doors and windows which will give the agricultural building a suburban / domestic character. Obviously doors and windows have to be added for human habitation and these should be minimised in use and sizes adjusted to standard doors and windows (e.g. doors 2m tall by 0.85m wide, windows 1m tall by 1m-1.5m wide).

b. Light pollution
Nutbourne sits on the boundary edge of the South Downs National Park (SDNP) which has a dark skies policy (TAN). As residents we voluntary minimise night lighting to preserve the dark skies and encourage wildlife. It should be noted the agricultural building does not emit any light at night, primarily as it does not have any transparent apertures and it is not used at night. Given the proposed design incorporates fenestration in the roof line (12 x skylights) and floor to ceiling doors and windows around the building, the converted structure will emit significant light during the night. We recommend the use of automated blinds within the skylights which are activated at dusk to minimise light pollution. All outside lighting (if installed)

should be installed using the SDNP TAN guidance e.g under 3 metres, point down, use warm light lower lumen bulbs which are manually operated. The use of movement activated (PIR) high lumen flood lights should not be permitted, primarily as this will create excessive light pollution and disturb night wildlife.

c. Landscape setting and character
The agricultural building sits in a very prominent and very visible position high on the landscape and is observed for a distance of over one mile from public footpaths (FP2336, FP2309_1, FP2338, FP2339, FP2340) and bridleway (BW2334). FP2336 passes adjacent to the building on the north side. Any design should blend into the rural setting and give the appearance as though it was still an agricultural building. The proposed design is projecting a clear residential occupancy status with the use of numerous apertures and floor to ceiling doors and windows.

4. Other – Agricultural Occupancy Condition
Should Horsham District Council (HDC) approve the application then we would prefer to see an Agricultural Occupancy Condition (AOC) placed upon the conversion. This is primarily to relieve the limited supply of suburban housing stock being used by agricultural workers, who have limited places to live within the rural community. The conversion presents an opportunity for the applicant to provide agricultural accommodation serving the rural community and ensuring the limited suburban housing stock is used by those who need to reside in a suburban community (local commercial occupations, commuters, etc.).

HDC have set a precedence in this area with the approval of (DC/23/2123) Nutbourne Place Farm (who is a neighbour to the applicant) for a conversion of a former agricultural building to a dwelling with agricultural tenancy.

The applicant has three dwellings on the site (Nash Manor, The Barn and The Cottage) and currently rents one of these for residential use. It would appear the applicant accepts rental accommodation as a method of income and the conversion would provide additional income for their property development business.

5. Other - dwelling occupancy
The applicant has stated in their application they plan to convert the agricultural building to two dwellings with two bedrooms. The supplied floor plans show three bedrooms not two. Please ask the applicant to clarify the floor plans and the intended occupancy.

6. Overdevelopment of the site
The site currently has three official dwellings listed under the HM Land Registry (Nash Manor, The Barn and The Cottage). The occupancy of the current site has a minimum of six people with the potential for twelve. With the additional conversion to add two more dwellings with three bedrooms the site would increase to a minimum of ten people and with the potential for twenty. Consideration should be applied to water usage within the site and achieving water neutrality.

7. Other – Developer
It should be noted from the applicants response letter of the 31/01/2022 within the previous planning application DC/21/2854 that the applicant is a property developer. This information is publicly available to review at the following web sites:-

https://www.marlandspark.co.uk/about-us/
https://thehuntergroup.co.uk/about-us/

8. Other – Environmental
This area contains a great deal of wildlife, specifically bats, swallows, kestrels, buzzards and owls which all nest in this area. We constantly see all of these on our own property and surrounding fields and farms throughout the year. The agricultural building has provided annual nesting for swallows, which we have observed for many years.

With the conversion to residential the nesting habitats within the agricultural building will be lost and this wildlife will be forced to move to other locations.

9. Other – Loss of agricultural amenity / Rural Economic Development
Lower Nash Farm (the site) has historically been a livestock farm for well over 100 years. Should HDC approve plans to convert the agricultural building the site will inevitably become fully residential area over time and be subject to further residential planning applications, resulting in the loss of the agricultural amenity.

HDC has a public responsibility to maintain Rural Economic Development (Horsham District Local Plan 2021-38 Policy 8) I quote "*Farms and rural estates are key custodians of the countryside and provide a valuable contribution to the rural economy"* and needs to be mindful that the agricultural land on this site (approximately 15-17 acres) has the potential to be permanently lost to residential status.

Sincerely,

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