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PLEASE REPLY TO CLERK AS ABOVE

Mr. Tim Slaney
Director of Planning
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29th May 2018

By email to: tim.slaney@southdowns.gov.uk
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Dear Mr. Slaney

RE: SDNP/18/00938/FUL CALLOWAYS, GRAFFHAM STREET, GRAFFHAM GU28 0NJ

The Planning Committee of Graffham Parish Council met on Monday 21st May to discuss the planning application SDNP/18/00938/FUL following a Public Meeting of the Parish on Friday 4th May. From the reaction of members of the public at both meetings it was clear that they expected the Council to strongly **OBJECT** to this application.

It has been called in by the SDNP for the Reason stated in the notice namely:

‘The application is a major development due to the number of dwellings proposed and involves the substantial redevelopment of an existing farm complex in the open countryside. The site is in a sensitive rural location close to public rights of way, adjacent to a Grade 11 listed building and affects undesignated heritage assets. The proposal therefore has the potential to be significant in terms of its impact on the natural beauty, wildlife and cultural heritage of the South Downs National Park’.

We fully endorse the above statement as it clearly sets out the criteria. We should like to make the following comments in relation to the application:

1. Major Development

As it stands, we cannot see how the proposed development scheme may be demonstrated to be in the public interest (as paragraph 116 of the NPPF requires). For the reasons set out below, not least the cumulative impact of the creation of an additional 17 open-market houses in conjunction with the Homes of Rest development, we consider that the development scheme is very likely to have an adverse impact on the rural landscape character of the area, on the traditional character of the farmstead, on existing residents and on walkers, cyclists and horse riders.

Our comment stands but total of units are 16 open market houses.

South Downs Pre-Submission Local Plan

The Pre-Submission Local Plan is a material consideration in accordance with paragraph 216 of the NPPF, which confirms that weight can be given to policies in emerging plans following publication. Based on the current advanced stage of preparation (it has been submitted for examination and is due to be adopted in some four months), and given that the policies are considered to be compliant with the NPPF, it is our view that the policies in the Pre-Submission Local Plan which are relevant to this application are afforded weight. It is important to note that under the provisions of the NPPF it is a matter for the decision-taker (i.e. the SDNPA in this case) as to the degree of weight that may be attached to the policies in the emerging plan. To that end, we note that it appears to be the SDNPA's approach to afford some weight to those relevant policies in the Pre-Submission Local Plan because of the advanced stage of preparation of the Pre-Submission Local Plan and the degree of consistency of the relevant policies in the Pre-Submission Local Plan to the policies in the NPPF. This is notable in a number of recent planning applications which have been put to the SDNPA's Planning Committee, including SDNP/17/03717/FUL (part of which related to aspects not at all dissimilar from the proposed development scheme).

It is our understanding that the SDNPA Local Plan is due to be adopted on 2nd July. According to SDNPA's own planning recommendations to its recent Planning Committee meetings, the policies in the draft Local Plan are now given "significant weight". Given that the applicant's original planning statement stated (at para. 6.34) that "the weight to be attached to them (ie the draft Local Plan policies) is very limited", how will the applicant now address the fact that the draft policies are deemed to be given "significant weight"?

We should like to make the following points in relation to the proposed development scheme when considered against some of the policies within the Pre-Submission Local Plan:

SD1: Sustainable Development: the *cumulative* impact of the proposed development scheme in such a sensitive location is an important consideration. In conjunction with the neighbouring development at the Homes or Rest site (which comprises land sold by the applicant for that development), this sensitive part of Graffham will be the recipient of 17 new open-market houses within very close proximity. There will not be a single onsite affordable home.

With the alteration to 16 new open market houses *our comment stands*.

SD3: Major Development: this Core Policy is consistent with the policy set out at paragraph 116 of the NPPF and ought to be considered in the context of this application. We cannot see that there is any reasonable expectation that exceptional circumstances exist or that it can be demonstrated that the proposed development would be in the public interest. It is worth noting that the documents submitted with the application fail to demonstrate how the development would be in the public interest, nor did the applicant's planning consultants satisfactorily address this crucial element at the Parish Council Planning Meeting on 21st May.

Our comment stands

SD4: Landscape Character: the proposed development is not appropriate for this site and will adversely affect the character of the area. In particular, we have concerns with the intensification of the development in light of the number and size of the units, the associated garaging and car parking spaces, the introduction of gardens and the landscaping. The combined effect will be to produce an over-domesticated context for the old agricultural buildings that will have a significant negative impact on the character and sensitivity of this area.

Despite limited additional car parking and a more detailed landscaping scheme *our comment stands*

“will have a significant negative impact on the character and sensitivity of the area.

SD6: Safeguarding Views: the cumulative impact of the proposed development in conjunction with the development at the neighbouring Homes of Rest is likely to neither conserve nor enhance the sequential views from the local footpaths and other publicly accessible areas.

Our comment stands.

SD7: Relative Tranquillity: the proposed development lies within an area of ‘high tranquillity’ (according to the SDNP’s Tranquillity Study). We consider that the intensification of the proposed development will neither conserve nor enhance, and will in fact harm, the relative tranquillity which currently exists in the area. We note that this has not been addressed within the documents submitted with the application.

Our comment stands.

SD8: Dark Night Skies: the applicant’s lighting assessment does little more than state that *“the proposed development is located in a rural area within the South Downs National Park, which is regarded as a sensitive environment”*. In fact, the site falls within zone E0 established by Policy SD8, an area regarded as *“intrinsically dark”*. We understand that E0 is the darkest zone and comprises the Dark Sky Core which is, as the SDNPA assesses, *“the heart of the reserve which includes the best quality skies of the National Park”* and is afforded maximum protection. The lighting associated with a development of this intensification is very likely to have an adverse impact on the important quality and contribution which this sensitive area makes to the dark night sky and this part of the National Park.

Our comment stands.

SD26: Supply of Homes: no specific allocation of housing has been identified for Grafton. Further, the settlement boundary area is being significantly reduced. As such, we may infer that development is to be restricted. The Homes of Rest site will create five additional open-market dwellings within the village. None of these will be affordable homes. Contrary to the claim in the applicant’s Heritage Statement that there is *“much needed housing in the area”*, we consider that there is no *need* for an additional supply of twelve *open-market* dwellings as proposed by the application.

Despite the reduction to eleven open market dwellings *our comment stands.*

SD27: Mix of Homes: the development scheme proposes a mix of open-market houses that greatly departs from that set out in this policy. The scheme proposes:

- 0% one bedroom dwellings, as against 10% set out in the policy;
- 25% two bedroom dwellings, significantly less than the 40% set out in the policy;
- 25% three bedroom dwellings, significantly less than the 40% set out in the policy;
- 50% four+ bedroom dwellings, far in excess of the 10% set out in the policy.

The applicant's Planning Statement states that the proposed mix of dwellings "represents 50% smaller dwellings (2 and 3 bed)". However, the relevant comparison is that the proposed mix of dwellings represents 40% larger dwellings (4+ bedrooms) than the mix set out in policy SD27. The proposed mix in no way reflects the needs of the local community. No "*robustly or independently prepared*" evidence has been provided by the applicant to support the proposed alternative mix of homes that represents such a significant departure from that set out in policy SD27.

Due to the imminent adoption of the Local Plan it should be given "significant weight" so we wish to emphasize this point as the mix of homes in the revised proposals are still no way near the mix set out in this draft policy. The proposals are for;

1x1 bed – ie 9% of the total. The draft LP says AT Least 10% should be 1 bed

1x2 bed – ie 9%. The draft LP says at **least 40%** should be 2 bed. **This is not even close.**

5x3 bed – ie 45%. The draft LP says at least 40% should be 3 bed and this requirement is met.

4x4 bed – ie 36%. The draft LP says that **up to 10%** should be 4+ bed. **This is far in excess.**

The draft LP policy says that planning permission will be granted for an alternative mix provided that robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs. The SDNP states that this evidence " would normally be in the form of a housing need survey. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development".

Where is this robust and independent evidence?

The SDNPA also states that: "For avoidance of doubt, any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms". **With this in mind Houses 8 & 11 would each be treated as 5 bed rather than 4 bed dwellings.**

SD28: Affordable Homes: the proposed development scheme provides for no on-site affordable homes. Further, when considered in conjunction with the neighbouring development at the Homes of Rest, the cumulative impact is that this very sensitively located area of Graffham would receive an increase of 17 open-market houses with not a single on-site affordable home. It is clear

that this cannot be regarded as being in the public interest. In fact, it may be seen to be to the detriment of the local community given that it will not only fail to provide on-site affordable housing for locals but may also have the effect of pricing those with local needs out of their local community. Supporting and enhancing the lives and needs of locals is one of the consistent and core strands and objectives within the South Downs Pre-Submission Local Plan, as well as national policy. The proposed scheme fails to meet this.

We have to say we are bitterly disappointed and very surprised that at no time have we been involved in any discussions regarding the applicant seeking to make a financial contribution in lieu of on-site delivery of affordable homes. The SDNPA states that where a financial contribution is sought for sites of 11 house or more (as in this case) then a robust viability appraisal needs to be submitted in this case and it “ must be done on an independent and open-book basis, and must be undertaken by a professionally qualified member of the RICS to establish the appropriate form and level of contribution”. There appears to be no such viability appraisal to support the figure of £520,00 that has been proposed by the CDC Housing Officer. Graffham receives no affordable housing under this particular development and no direct monetary compensation. This is totally unjust.

SD30: Replacement Dwellings: the applicant’s Planning Statement states that the existing bungalow (to be replaced by a double storey house at plot 11) has a floor area of 138sqm, whereas its replacement (plot 11) will have a floor area of 253sqm. On our calculation, this amounts to an increase of over 83%, almost three times greater than the net increase of 30% permitted under policy SD30. It is clear that the character of the existing dwelling and the surrounding buildings will be impacted by the over-bearing nature of this house.

Our comment stands

SD41: Conversion of Redundant Agricultural Buildings: we do not believe that sufficient consideration has been given to the needs of local workers and residents in terms of determining the optimum viable use. The agricultural buildings and their contribution as a part of the farmstead to the setting of the area will be lost to the creation of 12 open-market houses, with no regard to local workers. On our calculation, the proposed scheme involves the demolition of some 20% of the existing gross internal floorspace a which in our view is a substantial amount and would appear to be contrary to the adopted 1999 Chichester District Local Plan Policy RE14 and also conflicts with Policy SD41. Further, we believe that that residential conversion will negatively impact the rural landscape character of the area and the traditional farmstead setting.

Our comment stands but with eleven houses

We note that a very recent application involving the residential conversion of existing traditional agricultural buildings to create seven dwellings was recommended by the SDNPA’s Director of Planning for refusal (Ref: SDNP/17/03717/FUL). The proposed development scheme at Calloways raises very similar questions, and overall the potential harm to the landscape and other associated aspects is far more significant (a fact which SDNPA recognise given that they have identified it as a major development).

The above application was refused and our comment stands.

2. Other points

We consider the application for this courtyard development has been hastily put together, lacks information and conclusions in many aspects, has little concern for the immediate area and the village it is part of, which will be shown below

Our comment stands despite the passing of a year

Pre-Application Advice

We are astounded that the applicants did not consider the seeking of Pre-Application Advice was necessary for such a large development in such a sensitive rural area. Likewise we are surprised that the application has not been deferred pending such discussions.

Access Driveway

There is no plan showing access from The Street to the site which indicates the unpreparedness of the application. The current access is a single-track drive which is inadequate to service this proposed twelve house courtyard development, five further houses immediately adjacent and other houses on The Stud with residents cars, deliveries and visitors.

Highways have requested more information regarding proposals at the junction of this driveway and The Street together.

With the exception of one plan in the Technical Note dated 21.9.18 there is no other plan showing the access

Traffic Survey

Graffham Parish Council have taken the initiative to commission a traffic survey to ascertain the flow of traffic though the village at a point just North of the entrance to the proposed development.

A total of 1905 movements were recorded in a Southerly direction for the week (Thursday 10th May to Wednesday 16th May) with a similar number to the North.

What is obvious from the data is that this is concentrated at school run times so that the TRICS data used by the applicant is really not applicable to the traffic passing up and down the Street.

Between 0800–0900 the 4.2 vehicles emerging from the entrance to Calloways (according to the Bellamy Roberts projection) will encounter over 100 traversing the street.

The 49 daily traffic movements projected by the Bellamy Roberts TRICS data almost certainly represents a very significant understatement with an average of 300 movements existing today.

Our comment stands

Car Parking

The proposed development does not satisfy the minimum car parking provisions providing just 29 spaces for residents as opposed to a minimum of 33 as required by TRIC. 5 of the garages do not comply with standard size requirements. Due to open car spaces allocated to the houses there is insufficient space for delivery vehicles and visitors to park except on the street.

There is inadequate turning space for refuse and emergency service vehicles and at the pinch point in the spinal road only one way traffic.

Car parking/garaging has been increased to 30 otherwise our comment stands

Existing Houses on Site

The plans show the proposed refurbishment of the existing buildings but make no mention of the two listed houses and two semi-detached houses at the north east end of the site and the free standing house, Calloways House, on the southern end of the development.. The applicants have stated that these will remain in occupation during the development. There is no mention of car parking of the residents and although not increasing the current traffic flow such vehicles should be included in the number of vehicles using the driveway and accessing The Street. Such number is likely to be in excess of 10 further cars excluding deliveries and visitors

Our comment stands

Public Right of Way

Running through the entire development is a Public Right of Way. This will have to be kept open at all times and clear of vehicles, equipment and materials besides the concerns of Health and Safety. No indication is given as to how this will happen. The Access Ranger of WSCC Public Rights of Way sets out very clearly the concerns, priority and what has to be done in the statement dated 23rd April 2018.

All plans show 'proposed footpath' although this footpath was adopted some three years ago. Our comment stands

Sewerage

No decision as yet has been made for disposal of sewerage although an on site plant is being considered. No indication is given as to where such a plant would be housed within the overcrowded site. We believe such a fundamental matter should have been well progressed by this stage of the application.

Our comment stands as there appears to be no further mention

Over-development

The proposal totally overdevelops the site. Despite the assurances of the applicant's engineers we consider that a number of the buildings in their present form will have to be demolished and rebuilt to provide acceptable residential accommodation.

Our comment stands

Conclusion

For the reasons stated above, Graffham Parish Council **STRONGLY OBJECTS** to the proposed planning application at Calloways.

I would be grateful if you could acknowledge receipt of this letter.

Yours sincerely



Cllr. Howard Charman
Chairman
Graffham Parish Council

cc CDCllr. John Elliot
cc WSCCllr. David Bradford.

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