

The Steyning Society
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Charity No. 269859

Planning and Development Department
Horsham District Council

Application No. DC/20/0789

Full Planning Application for the demolition of existing buildings and erection of a new residential building comprising 9no. houses & apartments and a B1 commercial office building with associated vehicle parking, cycle parking, bin storage and landscaping. Former B + W Building, Elm Grove Lane, Steyning, BN44 3SA
Perth Securities and Investments Ltd

I write on behalf of the Steyning Society in respect of this application.

We **object** strongly to this proposal on the following grounds and as explained below -

- It fails to take account of the Horsham District Planning Framework (November 2015) and emerging policies of Horsham District Local Plan Regulation 18 Draft Consultation Review (2020) in respect of quality of design, scale, character and impact on the amenity of residents in Elm Grove Lane and Highland Croft.
- There is no reference to the Sussex Extensive Urban Survey's Historic Character Assessment Report by Roland B. Harris (2004) and its archaeological and historic environment value.
- It takes no account of the adopted Steyning Conservation Area Appraisal and Management Plan 2018.
- Likewise, it is contrary to the draft Steyning Neighbourhood Plan's policies and vision and does not respect the character of the Conservation Area.
- There is no traffic and transport assessment of the accessibility and impact of the proposal on pedestrians in Elm Grove and links to the High Street and Tanyard Lane.
- From an economic perspective, there is no statement as to how the site has been marketed or whether commercial use is non-viable in the existing buildings.
- Horsham's Statement of Community Involvement (2019) provides clear advice on how to consult. Despite this adopted policy, there has been no pre-application consultation with the LPA nor community engagement with local residents and stakeholders.

1. Horsham District Planning Framework (HDPF) 2015

The HDPF Policy 32: Quality of New Development requires *'high quality and inclusive design to be based on a clear understanding of the local, physical, social, economic, environmental and policy context for development....development will be expected to complement locally distinctive characters and heritage of the district...contribute a sense of place both in the buildings and spaces themselves and in the way they integrate with the surroundings and historic landscape in which they sit. "*

HDPF Policy 33 Development Principles are to “ensure that it is designed to avoid unacceptable harm to the amenity of of occupiers/users of nearby property and land... ensure the scale, massing, appearance of the development is of high standard of design and layout and where relevant relates sympathetically with the built surroundingslocally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views)...take account of relevant Design Statements and Character Assessments....use high standards of building materials etc...”

HDPF Policy 34 Cultural Heritage Assets states that the Council “will sustain and enhance its historic environment through the positive management of development affecting heritage assets. Applications ..will be required to reinforce the special character of the district’s historic environment through appropriate siting, scale, form, design; including the use of traditional materials and techniques...make a positive contribution to the character of the area, and ensuring that development in conservation areas is consistent with the special character of those areas....retain and improve the setting of heritage assets.....”

2. Local Plan Regulation 18 Draft Consultation Review 2020

This emerging Local Plan’s policies reinforce those of the HDPF and although it is still a draft document, they are helpful in considering this proposal - Strategic Policy 33 Development Quality, “development will be required to provide an attractive, functional, accessible, safe and adaptable environment in accordance with the principles of the National Design Guiderespond to locally distinctive characters and heritage of the District...contribute a sense of place....” Strategic Policy 34 Development Principles, “be designed to avoid unacceptable harm to the amenity of existing and future occupiers of nearby property and land through overlooking, dominance or overshadowing. traffic generation an general activity...ensure the scale, massing and appearance is of a high standard of design and relates sympathetically with the built environment....ensure it is locally distinctive in character, respects and responds to the character of the surrounding area...and Strategic Policy 35 Heritage Assets and Managing Change in the Historic Environment requires developments to reflect “current best practice guidance produced by Historic England and Conservation Area Character Statements” and “make a positive contribution to the character and distinctiveness of the area ensuring that development inn conservation areas is consistent with those areas...”

Comment

We consider that this application will have a detrimental effect on surrounding properties and the Conservation Area in direct conflict with HDPF Policy 33 - Development Principles. It will cause demonstrable harm to the amenity of the residents of Elm Grove and Highland Croft through its scale, form and height. It dominates Elm Grove in an oppressive and unimaginative manner. This is in direct contradiction to the requirement to avoid “dominance“ and respect the character of the surrounding area. There is no explanation how a two and a half storey development is compatible with the HDPF Policies 32, 33 and 34 or the Local Plan’s Policies. Reference is made to Croft Meadow and Steyning Health Centre, but these two buildings are outside the Conservation Area adjacent to a large public car park. The design of the proposed residential building and the materials make no reference to the character of Elm Grove Lane and its “village” feel of two storeys, faced with flint and red brick dressings.

Although the application's Planning, Heritage, Design and Access Statement (p.11) recognises that the site is partly located within the Steyning Conservation Area it fails to identify the cottages opposite in Elm Grove Lane as Grade II listed assets. It claims that the proposal would enhance the character and appearance of the Conservation Area but this is not illustrated, demonstrated or proven. It suggests the design of the building has responded to the context of the site. Unfortunately it has not and we reject this assertion.

We conclude that the proposal is contrary to HDPF Policies 32, 33 and 34 and the emerging Local Plan Review Strategic Policies for reasons of design, scale, character and impact. It will cause demonstrable harm to the amenity of properties in Elm Grove Lane and Highland Croft.

3. Sussex Extensive Urban Survey - Steyning's Historic Character Assessment Report 2004

The Sussex Extensive Urban Study was a study of 41 towns in the county councils of East and West Sussex, together with Brighton and Hove City Council undertaken between 2004 and 2008 by Dr. Roland B.Harris. Steyning's Historic Character Assessment was published in 2004. The town was divided into Historic Urban Character Areas (HUCAs) and each was assessed for its Historic Environment Value (HEV). The site is within HUCA8 and overlooks HUCA5.

The site itself sits within Tanyard Lane (HUCA8) which gets an HEV of 2. However, the archaeological potential is still considered moderate to high and the Report notes-
“Archaeological excavations in the south-east part of this HUCA; the lack of occupation during much of the late and post-medieval period; the location of this area within the Saxo-Norman and pre-1350 town; and the low density of most of the 19th and, especially, 20th-century expansion of the town in this HUCA; and the previous non urban nature of the area mean that the archaeological potential of this HUCA is moderate to high”.
It is considered that the lack of density of later development means an archaeological remains may be well preserved.

The site overlooks Elm Grove Lane, which is part of HUCA2.

The report says - *The rarity of the survival and condition of plots and, especially, the late medieval and post medieval buildings; the completeness of historic street-front (in the context of a functional high street); the visibility of much of the historic fabric (externally and internally in easily accessible commercial premises); and the archaeological potential give this HUCA the very highest Historic Environment Value (HEV) of 5.....*

We note the importance of this site in terms of its archaeological/historic value and the failure of the application to address these issues.

4. Steyning Conservation Area Appraisal and Management Plan 2018

This adopted Appraisal is to be used along with HDPF Policy 34 *“to help determine planning applications”* Horsham Cabinet Decision 25 January 2018. Both the HDPF and

Local Plan Review require developments to take account of the such Appraisals but this application fails to recognise or reference it. The Appraisal recommends in respect of new development (Chapter 9) *“it must be considered carefully and the effect of new buildings on the setting of the Conservation Area, and on views both into it and out of it, particularly taken into account. New development must be sympathetic to its context in terms of its siting, scale (including height, size and massing), materials and details. It should also follow the existing pattern or grain of development, not obstruct important views, and not dominate buildings in the immediate vicinity. Materials should be carefully chosen to complement the Conservation Area’s existing palette of materials.*

This reinforces our observation above that this application makes no attempt to understand the importance of the Conservation Area and fails to illustrate how the development has taken account of the Appraisal and its recommendations.

5. Steyning Neighbourhood Plan 2019

The Neighbourhood Plan has not been made but it sets how development should be guided in Steyning 2019 - 2030. Its Vision for Steyning is that the Parish will *“treasure its heritage, having enhanced it where possible so that the Parish continues to be an attractive place to live, learn, work and visit.”* The Plan (para 4.10) *“requires all developments to be designed in a sensible way, to ensure that they respect and incorporate the environment into the scheme and actively seek to incorporate other measures to reduce the impact of development of the local and global environment”.*

The Plan’s volunteers undertook a character appraisal in summer 2019. The Plan’s Policy SCP3 Contribution To Character has two policies -
SCP3.1 Development proposals must demonstrate how they contribute to the features which positively contribute towards Steyning’s character, taking into consideration the Steyning Character Assessment 2019 and the character areas identified within it.
SCP3.2 Development shall protect the amenity of neighbours, and respond to the scale, mass, height and form of neighbouring properties.

The application fails to show how this proposal is a positive contribution to Steyning’s character or protects the neighbouring properties’ amenity in terms of scale, massing, height and form. We consider that it is contrary to the draft Neighbourhood Plan’s vision and policies.

6. Highways impacts

HDPF Policy 40 recognises the need for sustainable transport and safe access to improve development. This site on Elm Grove Lane has a poor and direct access onto the High Street and has a difficult, narrow and constrained link to Tanyard Lane. It is an important pedestrian route through the town to Schools and Shooting Fields. It is used by schoolchildren and parents with buggies and older persons walking to Highland Croft and Tanyard Lane. The potential dangerous conflicts with pedestrians and access difficulties are not recognised. There is no appraisal of the traffic implications of this proposal or how the access to the High Street will be safe and avoid conflict with pedestrians and traffic. Similarly, there is no assessment of the potential difficulties with the narrow access via Elm Grove Lane. There needs to be an evaluation by the Highway Authority, West Sussex County Council of the proposal and agreement on a safe solution.

There might be a possible access from the adjacent public car park, but this is not explored. It should be undertaken, if and when a revised application is submitted.

7. Marketing for commercial use

Applicants are required to demonstrate HDPF Policy 9: Economic Growth that *“Redevelopment of employment sites and premises outside Key Employment Areas, must demonstrate that the site/premises is no longer needed and/or viable for employment use.”*

The Local Plan Review Strategic Policy 7: Employment Development goes further - *“Proposals for other uses must demonstrate that both the premises and site are no longer needed and are no longer viable for employment use. The assessment of these will have regard to:*

- a. Vacancy, including the reasons for vacancy and the length of time vacant,*
- b. Evidence of active marketing that reflects the condition and local economic market within the terms of sale and, where applicable, rent. Active marketing will be expected to cover a period of at least a year with written confirmation from the commercial agent(s) regarding the redundancy and lack of viability of both the premises and site for employment.”*

We note that the HDC Economic Development objects to the loss of commercial floorspace without the evidence to show how the site has been marketed or whether there is any level of interest. The proposal would reduce employment opportunities in the town centre and needs to justify the change of use to residential.

8. Consultation - Horsham’s Statement of Community Involvement (SCI) 2019

The HDC SCI Statement has been adopted, following government planning guidance on effective engagement between plan makers and the local community, consultees etc. This recognises the importance of applicants at pre-application stage carrying out *“early engagement with the local community, before submitting a planning application.”*

The Statement strongly encourages developers to seek pre-application advice, noting that this *“is a best practice approach, as set out within Government guidance. The pre- application process can identify potential problems or improvements that could be made to proposals at an early stage. We recommend that any development scheme is developed involving consultation with local residents, organisations and other key stakeholders in addition to the Council and prior to submitting any planning applications for major developments and other complex developments, which would invoke significant public interest. The applicant should consider the outcome of any public consultation to help inform the submission of any planning application.”*

There has been no pre-application advice sought from the LPA and residents were not consulted before the application was submitted. This is contrary to Government Advice and best practice. As a result neighbours and other stakeholders such as this Civic Society were not informed and have been unable to influence the proposal as recommended by the Statement.

9. Conclusions and recommendations

We consider that this application should be refused for the reasons given. It is contrary to the Approved Development Plan 2015 Strategic Policies 32, 33 and 34, and the Local Plan

Consultation Review 2020 Policies Policies 33, 34 and 35. It fails to recognise the historic value of the site and surrounding area and the guidance of the Steyning Conservation Appraisal and Management Plan 2018. It is contrary to the Neighbourhood Plan's vision and policies. There has been no traffic/pedestrian assessment or safety audit by the Highways Authority of the impact of the development on the dangerous junction with the High Street or the narrow Elm Grove Lane. There has been no marketing information provided about the commercial viability of the existing building, as required by the Local Plan. Finally, no attempt has been made to follow the advice of the Statement of Community Involvement to undertake pre-application or community consultations.

We recommend - that the proposal is withdrawn and the applicants prepare a planning brief for the site taking account of the appropriate planning policies but in particular the setting and design of any proposed buildings in relation to the historic value of the site and surroundings, the Conservation Area and the listed cottages in Elm Grove Lane. Such buildings should be two storeys, limited in scale of an appropriate design reflecting local materials such as flint and stone and not dominant. Potential parking access from the Newmans Gardens Car Park should be investigated. The Brief should be discussed with the Planning Authority, consulting local residents and stakeholders before any further application is submitted.

Tony Struthers OBE, MRTPI (Rtd)
Secretary, Steyning Society