

Town and Country Planning Act 1990 (amended)

Planning Appeal Additional Documents

Planning Inspectorate Reference: APP/Z3825/W/24/3350094

Planning Application Reference: DC/24/0021

Appellant: Bellway Homes Ltd (Strategic Land) – hereinafter referred to as Bellway in this correspondence

Appeal Site: Thakeham Mushrooms Farm, Storrington Road, Thakeham, RH20 3DY – hereinafter referred to as the Mushroom Farm in this correspondence

1. This representation is submitted in accordance with the directions of the Inspector as per the letter dated 3rd April 2025 published by Horsham District Council.
2. I am submitting this correspondence to petition the Planning Inspector to **REJECT** Bellway's appeal, as the Secretary, on behalf of Chanctonbury Community Land Trust Ltd. (hereinafter referred to as CCLT). The Chair of CCLT, Caroline Instance attended the Appeal as an observer on the CCLT's behalf and noted several incorrect factual statements regarding historical context were made during the Appeal, CCLT's response is in part intended to correct the record.

CCLT was set up in response to the closure of the Mushroom Farm by Thakeham Mushrooms Ltd. (<https://e-voice.org.uk/chanctonburyclt/>). We wanted a community owned entity to buy the land to ensure that its development was consistent with Thakeham's Neighbourhood Plan (TNP) and that any development was community rather than developer led.

The village suffered a great deal when the Mushroom Farm sold a large plot of land, now the Abingworth development, ostensibly to provide funding to maintain the Mushroom Farm as an agricultural employment site. There was disruption and disunity – Thakeham Village Action fought a very effective campaign and took out an injunction against the planning application. The community action however did result in improvements to the initial proposal and significant community benefits. The community and the initial residents on the new development have been deeply disappointed that HDC allowed that plan to subsequently be altered to include more housing and failed to enforce essential infrastructure like drainage. The Abingworth development demonstrated a profit driven approach to housing rather than any sympathy to its place, rural character and employment situation. The community voice was excluded.

Thakeham is a small village with a history dominated by agriculture, market gardening and for almost a century, mushroom production. Most of the housing in the centre of Thakeham beyond The Street was built as housing for workers at the Mushroom Farm. In the 1960s the Mushroom Farm was the largest mushroom production facility in Europe; it had a canning operation, pig farm to create manure and a research centre.

Thakeham was one of the first Parishes to have a Made Neighbourhood Plan. It was developed by a community led steering group with support from Thakeham Parish Council (TPC) and charitable consultants Action in Rural Sussex (AiRS).

Although we acknowledge comments that the TNP is "out of date", CCLT challenges this assertion as the TNP was written with a timescale to 2031 very much in mind. TPC recognised that minor revisions and updating would be required after adoption to recognise factors such as the moving of Thakeham First School from The Street to form Thakeham Primary at the Rock Road site near Storrington, and the increase in the number of properties built over the original consent at Abingworth.

Despite the prime justification for the Abingworth development being the continued operation of the Mushroom Farm as a growing facility, the authors of the TNP anticipated a situation whereby the Mushroom Farm might close and the TNP represents the expressed wishes of the Parish for future use of the Mushroom Farm given that eventuality.

CCLT totally supports the refusal of planning permission for the reasons given by HDC, but we were and remain disappointed that greater credence was not given to the wishes of Thakeham Parish as defined in the TNP when the HDC Planning Officers assessed Bellway's application. CCLT is confident The Inspector will have examined the TNP, but we believe it is important to reiterate the salient information, and therefore we have copied the relevant section.

Thakeham 3: Horticultural Land off Storrington Road ('Mushroom Site')

Provided that it can be demonstrated that all reasonable efforts have been made to secure an agricultural and horticultural use of the site, redevelopment for one or more of the following uses will be permitted:

- a. a D2 recreational use compatible with the countryside location;*
- b. a solar array use;*
- c. a B1 light industrial/commercial use and/or tourism use within the existing developed area of the site with the remainder returned to an open agricultural use.*

4.23 This Policy for the important, established horticultural site on the edge of Thakeham village seeks to promote the continuation of that use but it also defines what would be acceptable should the existing business leave.

4.24 Should the existing mushroom producer leave, the reuse of the site for agricultural or horticultural purposes will be supported, provided that the impact of the new use is not greater than the existing use. This includes building footprint being no larger, building height no greater, number of traffic movements no greater, to maintain the rural character of the local area. Should no new agricultural or horticultural occupier be found, then there are a number of other uses that may be appropriate for the site, including recreational facilities, a solar farm or others with similar beneficial uses and with low impact (noise, traffic, light effects).

4.25 Alternatively, light industrial uses or tourist facilities, appropriate to a countryside location, on the hard standing area, plus demolition of the remaining buildings and hard standing, would be acceptable. The remaining land would be used for agriculture and/or horticulture.

When Bellway bought the land in 2022 the TNP was within its first 5 years. The marketing of the site was undertaken by Strutt and Parker who would not disclose the seller's identity. In the application Bellway states its first pre-app meeting with HDC was in 2022.

The marketing leaflet shows it was being marketed as an agricultural facility and it was reasonable to expect it to be sold at agricultural land prices, which was the basis of the initial offer made by Caroline Instance (CI) on behalf of the future CLT.

It's not true to say that buyer P (CI) was repeatedly asked to prove source of funding. When asked CI said she and Martin Pike of Oxford Advanced Living wanted to meet with the client and would prove finances then. They would have been given an opportunity to increase their offer if they were being taken seriously – it was clear from the junior assigned to the case at Strutt and Parker and the tardiness of their correspondence that it was not.

Clearly as we later learnt, Thakeham Mushrooms had already sold the site to Bellway before the marketing commenced, thus the marketing exercise was a sham as Bellway had no intention of renting or selling the site for any agricultural purposes. At the Appeal

Hearing Bellway's Counsel may have asserted that there was no disagreement with them and HDC about the marketing and its outcome.

CCLT refutes that there were not any potential buyers of the Mushroom Farm who wanted the site for agricultural uses. Aside from what CCLT believes the Mushroom Farm can be used for, we subsequently learnt that Mr Chris Steadman of Champions Farm, Abingworth also put in a bid so that he could obtain more south facing vineyards. We have discussed doing something in collaboration if CCLT were to be successful in acquiring the land.

CCLT has also been approached by people who wish to have a flower growing facility and a market garden (along the lines of the one at Knepp). If the sheds had been properly maintained they could be used to grow other internal crops such as salads, specialist mushrooms for food and other purposes, medical cannabis etc.

CCLT disagrees with the assertion made by Bellway that the Mushroom Farm is a brownfield industrial site, it is and has for nearly a century been an agricultural facility, not all crops are grown outdoors, and just because the growing sheds have an industrial appearance, that does not change their agricultural use. Until recently it was a state-of-the-art mushroom production facility, with surrounding fields being leased for the growing of cereal crops. Large tracts of the land have been let "go wild" since the time it ceased having a compost making facility. It is a wildlife haven and arguably already one of the most biodiverse parts of Horsham District.

CCLT is serious about offering an alternative vision for the Mushroom Farm, we had an initial Pre-App meeting with HDC in January 2024 and the final proposal CCLT might make for use of the Mushroom Farm if the Appeal is refused, will be guided by those discussions and consultations which will be held with the local community.

We recognise that the views of the Parish may have changed since 2017 as it has grown substantially, but based upon the response of many Abingworth Development residents to the Bellway plans for the Mushroom Farm, the reasonable expectation of these new parishioners as well as those of longer term residents is that the Mushroom Factory would not contribute to an increase in housing in the village and would continue to operate as an agricultural facility.

From CCLT's perspective it is hoped that most of the site will continue to be used for horticultural and related agricultural purposes, other economic long term job creation activity or remain as open green space.

What is possible will in some part be dependent upon the condition of the buildings as Bellway is allowing the condition of the site to deteriorate. This lack of care is probably because horticultural growing sheds and offices do not fit with the site being used for new house building.

In addition to use of the buildings for agricultural/horticultural purposes CCLT envisages that other parts of the farm could be developed to support local tourism, for example:

- Glamping
- Workshops for heritage crafts
- Workshops for leisure classes in arts and crafts
- Teaching kitchen
- Wine related educational facilities run in association with the two vineyards in Thakeham

Whatever CCLT does with the site we consider it important to maintain and improve the existing wildlife corridors and the green spaces which exist through the site to provide further environmental gain. We will work with adjoining landowners to link up to Knepp to

the northeast and be part of the Weald to Waves initiative and the conservation work of the South Downs National Park in the south.

- Wooded areas could be expanded and potentially be used for natural burials
- The natural water courses could be expanded to allow for a natural pond area
- This whole area could then be a nature reserve (like Warnham or the area recently purchased by HDC at Bramber Brooks)

Given the extended period that a large part of the acreage has been left wild this is the only way we can see that the whole area of land would be able to demonstrate a genuine net increase in biodiversity. Sussex Wildlife Trust (and hopefully Wilder Horsham) will act as consultants.

3. CCLT fully supports the decision by HDC to refuse Bellway's original Planning Application on the grounds that the location of the Mushroom Farm is not a sustainable site for a housing development of this size. Despite the efforts made by Bellway to assert that Thakeham should be classified as a medium village in the document they commissioned Lichfields to produce to support their appeal dated 29th of October 2024, (SAVILLS:APP/Z3825/W/24/3350094 - Appendix L - Facilitating Appropriate Development in Thakeham). It will have been clear to The Inspector when visiting that the Parish is correctly classified as a small village accessed by very narrow roads with limited facilities.

The lack of infrastructure mitigates against a development of this nature in Thakeham, especially the requirement for residents to drive to access:

- Healthcare facilities
- Education facilities
- Shops

Lichfields' assertions contained errors that were evidently the result of attempting to employ hypothetical national models instead of conducting fundamental factual research concerning Thakeham. These errors were acknowledged by Bellway in its Appeal documentation. Nevertheless, further errors persisted during the Appeal, which The Inspector should consider when making a decision to refuse the Appeal.

- a. The Pre-School: A lack of research led Bellway to make entirely erroneous assumptions about the Pre-School and the impact of the increased population resulting from the development regarding its viability. Contrary to the Appeal comments, TPC isn't close to finding a new occupant for the building. The building's small attendance capacity mitigates against economic viability for a commercial operator, and recent safeguarding legislation means that compliance costs seriously impact upon the feasible operation of a community interest facility.
- b. Walking and cycling: Although Bellway in the draft S106 Agreement have offered money to upgrade PROWs in the area around the Mushroom Farm, anyone who has taken the time to examine the PROWs in person, will know these upgrades won't increase usage. For example, none of the named PROWs are lit, pass through wooded areas, are prone to flooding in the Winter and consequently are only suitable for exercise/dog walking, not as a means for example to get to Storrington to go to the Doctor's. The proposed PROW upgrades will not reduce car journeys or take cyclists off the B2139.
- c. The document prepared for Bellway by Rapleys on March 24th outlines potential uses for the Class E commercial space. This document is flawed in its reasoning and further demonstrates that Bellway and its consultants have made minimal efforts to understand the needs of Thakeham and its residents. Rapleys state that a convenience shop would be an ideal use of the Class E space, but do not believe that the current

population of Thakeham is sufficient to sustain and attract a retailer to occupy the proposed commercial unit.

However, somewhat miraculously, the building of 247 properties by Bellway would create a viable population number, this ignores a basic fact regarding the Parish of Thakeham and its population distribution.

CCLT understands that The Inspector drove around the area and would have noted Thakeham is a long thin Parish, with a population concentration in the central part of the Parish close to the Village Hall. The Northern area of the Parish is made up of widely distributed rural properties where most of the residents generally travel to larger centres other than Storrington for the services they utilise.

Conversely around a third of the population lives in the South of the Parish in the area bordered by the B2139 road and Water Lane. This area is contiguous with Sullington and much of the population don't even view themselves as Thakeham parishioners. They're able to easily access the facilities in Storrington by foot and in no circumstances will they drive to a convenience store on the site of the Mushroom Farm. Thus, if the current population of Thakeham is insufficient to sustain a retail unit, adding the population of the Bellway development isn't going to convince any retailer who will do their due diligence and conclude that a significant percentage of the population would never use a shop in that location.

Likewise, the proposal to locate a Gym in part of the Class E facility is flawed. Chanctonbury Leisure Centre is already a significant facility in Storrington and it's unlikely a unit of the proposed size in Thakeham would be able to compete with it. The Thakeham Village Hall Trustees also have concerns regarding this potential aspect of the use for the Class E space, if the hirers that currently run exercise classes were to be offered more favourable hire rates to utilise this facility. In such circumstances the future viability of the Village Hall would be in serious doubt.

Given these considerations CCLT questions whether the Class E facility would ever be constructed, and if it was, would it ever be occupied for the reasons proposed by Rapleys.

4. CCLT shares the concerns expressed by HDC regarding the proposals for the bus service that Bellway have made at this very late stage of the Appeal process. Given the timescale for the potential enhanced service to commence a significant number of residents will have occupied the development long before the additional buses start to run. Those residents would require a car for commuting and shopping and would be unlikely switch to a bus service in the future.

Similarly, given the time that it will take to build all the proposed 247 properties, the bus service provision is unlikely to continue for long enough after the development is completed to make residents abandon cars as the main means of transport. Given that more than 30 passengers would need to use every single bus, simple economics means that the proposed additional services will not be viable and will be discontinued when the Bellway funding dries up. Thus, the increased number of private car journeys would significantly increase even if they were temporarily held in abeyance by the proposed enhanced bus service.

CCLT therefore asks The Inspector to recognise that this expensive gimmick would not in the long term address the safety issues posed by many additional vehicles using the B2139. Which coupled with the significant increase in HGV movements for the five years that development is likely to take to complete, means that existing Thakeham Parishioners and other users of the B2139 will be put at risk for no reason.

CCLT would also ask The Inspector to note when considering the proposed financial contribution to the EV charging point on the Mushroom Farm site and the provision of the Class E space, Bellway's unreliable track record of fulfilling S106 Agreement terms on the Abingworth development.

A Community Minibus EV charging point was meant to be provided close to the Village Hall as part of the S106 Agreement for the Abingworth Development, but only after more than two years of procrastination is this obligation being met, this Appeal process appears to have been the catalyst for Bellway to finally commence installation. The failure to satisfy this S106 obligation in a timely manner has unreasonably deprived the non-car owning Thakeham residents of a valuable transport option.

Likewise, Bellway were meant to construct 5 Community Workshops, with completion by the occupation of the 38th property, Bellway appealed the S106 obligation and requested construction with a later trigger point. Despite **all** properties being completed Bellway have not constructed the workshops but have recently engaged in discussions with TPC regarding alternative designs and ownership of the potential facilities to satisfy the S106 conditions. CCLT expect to be a part of the discussions, and it is envisaged will manage the assets on behalf of TPC.

5. Finally, CCLT supports the many concerns expressed by HDC in its "Requests for Costs" document. We would hope The Inspector will note the matters raised by HDC particularly regarding the submission of significant additional documentation after the timescales mandated by the Planning Process and dismiss these additional Bellway submissions.

CCLT had expected the nature of the appeal to be limited to an attempt by the appellant to refute the reasons HDC gave for their decision. Bellway (and their advisers) have attempted to broaden the issues and "muddy the waters" by offering things which should have included as part of their planning application.