

DC/19/2583 Amended: Demolition of existing redundant buildings and the construction of winery and tasting venue and associated landscaping, access and parking provision: Mill Farm, Hammerpond Road, Mannings Heath (Mannings Heath Golf Club and Wine Estate)

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Introduction

Once again, Mannings Heath Golf Club and Wine Estate has failed to hold a proper public consultation with the Parish Council and wider community. This amended application therefore has the appearance of a top-down, imposition of a large factory into the Parish’s much-valued countryside in the High Weald Area of Outstanding Natural Beauty (AONB).

Furthermore, the Parish Council notes that this amended application does not constitute the entirety of Mannings Heath Golf Club and Wine Estate’s plans for the Mill Farm site. The applicant has stated that a further application to develop

the two barns on the site will follow. A fully comprehensive application for the whole site should have been submitted and this type of piecemeal development refused by HDC. It is noted that the developer has omitted the wedding venue and restaurant from this amended plan. However, these could well re-emerge in the promised applications for development of the two barns in the future.

The Parish Council has a proven justification for questioning the integrity and true intentions of this developer. Only this year, Mannings Heath Golf Club and Wine Estate has shown complete disregard for planning regulations and contravened them. Planning application DC/18/0958 gave the applicant permission to build a replacement barn containing a “rest room and machinery store” on part of the golf course that is approached from Hammerpond Road along a wide public bridleway/footpath. After the builders told local walkers that they were building a “wedding venue”, HDC’s Enforcement Officer visited the site and found that the building was not in accordance with planning permission. It had been re-orientated through 90 degrees, was larger than permitted and contained six toilets, suggesting that this building was indeed intended as something other than a “rest room and machinery store”.

This is the context then within which the Parish Council considered this amended planning application. It subsequently agreed unanimously on the 15 July 2020 to object to this application in the very strongest possible terms. It views this partial application as totally unacceptable across a wide number of criteria which it expands upon in the text below, from point 2 onwards.

1. Comments on the “Planning Statement” submitted by Parker Dann

It is recognised that planning consultants solely represent their clients’ best interests, however there are a number of matters contained within this report that should not stand unchallenged.

It is not correct to say that the agricultural buildings are all “redundant”. At least some of them are used for the storage of materials and equipment used by the Mannings Heath Golf Club’s greenkeepers.

It should be noted that three of the reports listed in the report are not available to the public to read. They are: Noise Assessment; Drainage Strategy; and Ecological Impact Appraisal.

The land is not “brownfield” as claimed because agricultural land is excluded from this designation.

The planning application does not state a final height for the building since a specialist designer has not yet given advice on the matter. Therefore, it is not correct to say, “The height of the building will be 8 metres at its tallest”.

The figure given for the footprint of the proposed development clouds the true extent of the development, given that a subsequent planning application for the same site is yet to be submitted.

It should be noted that phrases such as the “scheme... conserves and enhances... the wider AONB setting” should be acknowledged as the author’s opinion, rather than presented as fact. The Parish Council contends that building a large industrial factory cannot possibly conserve and enhance an Area of Outstanding Natural Beauty.

2. Size of the proposed development

This amended, but partial planning application gives no indication as to the full extent of this developer’s intentions for this site. However, close scrutiny of this amended application, to be followed by at least one further application, reveals a major, extensive development. It includes: a large industrial factory to transform grapes into wine; a storage area for 285,000 wine bottles; a wine tasting area; an office and laboratory; a workshop; chemical store; water treatment room; a large mobile bottling unit; and parking for 16 cars.

What has been subtracted from the original planning application are: the restaurant; wedding venue; and more extensive parking. This amended, but partial, planning application is thus presented as proposing: smaller, lower buildings; quieter functioning; and fewer traffic movements, thus trying to overcome earlier objections to the original planning application.

The Parish Council has a number of problems with this amended presentation of the applicant’s plans. Firstly, the apparent reduction in the size of the factory and storage area seems odd given that the number of bottles of wine to be made and stored has gone up from the original application. The original application was for the production of 75,000 bottles per year, resulting in 225,000 bottles in storage but this revised application is for 95,000 bottles per year and 285,000 bottles in

storage. This represents a 26% increase in wine production which appears at odds with a factory/storage area that is, according to the amended planning application, 50% smaller than the original application. This disparity clearly needs an explanation if any planning decisions are to be made on the basis of the applicant's figures.

Even if the applicant can explain away the reduced size of the factory/storage area, the proposed development remains as a massive development in the countryside, on AONB land. This is land that is not within the boundary of any "established rural industrial estate" (thus contravening policy 10 of HDC's Planning Framework). On this ground alone, this proposal for development is unacceptable and should be refused planning permission.

3. Function of the proposed development

The application represents a fundamental change of land use. At the present time, the farm buildings are used by the greenkeepers to store and maintain their ride-on grass mowers and other equipment necessary for the upkeep of the golf course.

The proposal is for a manufacturing plant to process grapes into bottles of wine. This is a highly mechanised activity, requiring the input of many types of raw materials, (glass bottles, corks, boxes, paper, chemicals for cleaning purposes etc.) resulting in the output from the site of finished goods (bottles of wine). The bulk of the proposed development therefore is for industrial use B2, and not agricultural use, as claimed by the applicant. The wine-tasting area and presumably a shop is a commercial activity. The Parish Council strongly contends that industrial processing should be carried out on industrial estates and not on agricultural land. Furthermore, that there is no justification for industrial or commercial activity on this site in the AONB.

At the moment, this amended application does not include a restaurant, wedding venue and a huge space to cater for clients' parking needs, like the original planning application. However, given that a further planning application is promised by the applicant, these functions may well be resurrected.

The Transport Statement from Reeves Transport Planning cites Ridgeway Wine Estate as a model. According to its website, this business operates not only wine-

tasting with food, but a “drop-in” shop, garden and Sussex Day parties with live music, Easter and Christmas events, and corporate events with provision for coach parties. It is interesting that the Transport Statement provided by Reeves Transport Planning says, “The facilities at Ridgeway are similar to those proposed at Mannings Heath Golf Club”. So, the Parish Council concludes that commercial activities such as these could yet re-emerge at Mill Farm but the public would not know because this application is, wrongly in its opinion, only a partial one.

Commercial activities such as wine tasting, shops and those mentioned above are best suited to town or city locations, as acknowledged in the HDPF policy 11 which specifically says that tourism should focus on Horsham and that care should be taken to ensure that facilities in villages (and note that this proposal is for outside a village) are “in keeping” and “especially in and around the High Weald AONB”. An industrial plant, plus commercial proposals, represent a totally unacceptable change in the use of land at Mill Farm, and especially in view of the fact that this is AONB land in an unsustainable location along narrow rural lanes without footpaths, which are not served by any public transport.

4. The proposed building

The building is huge, covering over 2,000 square metres and with a height yet to be determined by specialist designers, but probably in the region of 8 metres. This causes the factory/storage area to be completely out of scale with the small, semi-detached, neighbouring Mill Farm Cottages, which is contrary to policies 32 and 33 of HDC’s Planning Framework.

The industrial-style building, constructed with black corrugated metal, does not reflect the local vernacular style. These local buildings are largely built of brick and tile because this is an area of clay on the High Weald. As such, the proposed building is contrary to policy 10 of Nuthurst’s Neighbourhood Plan and the Parish’s Design Statement, neither of which appear to have been consulted by the applicant, and policies 32 and 33 of HDC’s Planning Framework.

Furthermore, the Parish Council questions whether a building of this size is even needed, given the current acreage of vineyards on the golf course. Any proposal to bring in grapes from other vineries, such as from the developer’s other vinery at Leonardslee, will result in further heavy goods vehicles using the Parish’s

narrow and rural lanes, a matter that has received no comment in this planning application.

5. Proposed location

This site is constrained by its designations:

- It is inside the High Weald Area of Outstanding Natural Beauty (AONB)
- It is outside of Mannings Heath Built up Area Boundary (BUAB) and development is only permitted outside the BUAB in exceptional circumstances.
- It shares a boundary with St. Leonard's Forest which is ancient woodland, a Nature Reserve and Site of Special Scientific Interest (SSSI). At its nearest point, the industrial factory is only 25 metres from the boundary with the Forest.
- It is protected by policy 1 in the Nuthurst Parish Neighbourhood Plan (NPNP) which restricts development to within the BUAB.
- It should also be noted that the High Weald AONB has designated Mill Farm as ancient farm site and Hammerpond Road as an ancient highway.

Area of Outstanding Natural Beauty (AONB)

The site for this proposed development is in an area designated as the High Weald Area of Outstanding Beauty (AONB). As such, the National Planning Policy Framework (NPPF) para 172 requires that *“The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest”*.

The Parish Council contends that there are no *“exceptional circumstances”* that justify building an industrial plant and commercial premises in an AONB, especially when other wine producers such as Nyetimber are able to confine their production appropriately to an industrial estate in Crawley. The developer should be searching for a similar location instead of seeking to blight the countryside with a factory. Additionally, the Parish Council notes that the High Weald AONB has a policy on utilising/adapting existing buildings rather than building new ones and this is an approach strongly supported by the Parish Council.

Neither are there any “*exceptional circumstances*” that require a wine-tasting venue to be built in AONB, especially when the applicant already has a wine-tasting venue just metres away at the Mannings Heath Golf Clubhouse and another at Leonardslee, just a couple of miles away.

Indeed, the Parish Council contends that permission for this part of the proposal would have an adverse effect on Horsham town centre which is, no doubt, the reason for HDPF policy 13. This policy says that proposals for tourism and leisure, “outside the defined town and village centres, will be permitted only when a sequential test has been applied”. There is no evidence that this has been done by the applicant.

Nor is it in the “*public interest*” for an industrial process to be carried out on a site within the AONB or for there to be wine-tasting experiences and wine sales which is merely duplication of facilities already provided by the applicant nearby at the Golf Club House.

Furthermore, there is no documented evidence to support any notion that this proposal for an industrial/commercial development “*meets the development needs of the area*” (NPPF, para 11)

AONB Designations of Mill Farm and Hammerpond Road

The High Weald AONB Landscape Character maps, published to protect the historic pattern of settlements in its designated area, cites Mill Farm as an ancient farm and Hammerpond Road as an ancient routeway.

There are two important issues here. Firstly, Mill Farm (although now demolished) will inevitably have left some archaeological evidence of a medieval/post medieval building and farmland usage in the soil. Archaeological evidence for the nearby medieval iron-working industry may also be present. Therefore, an archaeological survey of the area should have been carried out to support this application and especially as the proposed industrial plant will require deep excavations to bear the weight of machinery (High Weald AONB Management Plan 2019-2024 Assessment Template, FH4). The Parish Council strongly believes that the historic nature of the proposed site must be protected (Assessment Template, S2).

Additionally, the existing farm barns, especially the Dutch barn should be maintained and not demolished. It should be noted that the High Weald AONB supports the reuse/adaption of existing buildings rather than the construction of new buildings and it is hoped HDC will reinforce this requirement.

Secondly, to preserve the historic character of Hammerpond Lane any development that proposes HGV traffic to service a processing factory and schemes to encourage tourist trips to a wine-tasting venue should be firmly resisted (Assessment Template, S2).

Built up Area Boundary (BUAB)

HDC has classified Mannings Heath as a small village with a specified BUAB wherein only small-scale development can take place. The application site for this major development is a significant distance outside the BUAB and is therefore in what constitutes the rural countryside that separates the village of Mannings Heath from other settlements. Because the proposed site is outside of the BUAB, it is therefore unacceptable to build on it. There are no exceptional circumstances that would nullify this policy.

Proposed site's boundary with St Leonards Forest

St. Leonard's Forest is a Nature Reserve with ancient woodland and is a site of SSSI. It should be noted that in winter, the proposed site is visible from the main forest track leading away from the visitor car park and given the nearness of the industrial factory to the Forest's boundary, its huge size and height would make it unacceptably intrusive.

Furthermore, St. Leonard's Forest protects species of wildlife that are rare and endangered, and known to have passed through the proposed development site, (such a purple emperor butterfly, woodcock, nightjars, lesser spotted woodpecker, six species of bat and barn owls). Since it performs such valuable functions, St Leonard's Forest should be protected from this adjacent, major and unneeded proposed development. As the applicant's proposal currently stands, there is very strong probability of a net loss of wildlife and no net gains whatsoever. The development is therefore contrary to policy 25, sub-paragraphs 1 and 3 of HDC's Planning Framework)

The Nuthurst Parish Neighbourhood Plan (NP)

The key policy affecting this Planning Application is Policy 10 which says, *“The scale, density, massing, height, landscape design, layout and materials of all development proposals.....will be required to reflect the architectural and historic character and scale of surrounding buildings. In the High Weald AONB, proposals must avoid any significant detrimental effect on its landscape and natural beauty”*.

The proposed major development with its large industrial-style factory clearly fails to reflect the architectural style and scale of the two, small, former-farm cottages that, in effect, lie on the same site. The whole scale of this development and its style would sit incongruously with these existing dwellings and cause them unacceptable harm. The proposal therefore contravenes policy 10 of the NP and policy 32 and 33 of the HDPF.

6. Sustainability of the proposed development

The Parish Council questions whether the applicant’s proposal is a sustainable one, or merely a highly speculative venture. The Environmental Impact Statement submitted by the applicant says the factory is designed, “to accommodate the anticipated volumes of grapes which would be produced in the future when harvests are good”. The two conditions in this phrase imply that the factory will only run at capacity when conditions are optimal. If this is not the case, the factory could run at below capacity, which is uneconomic, or grapes will be imported from elsewhere which totally belies the notion that the applicant needs the factory to service the applicant’s own vineyard in Mannings Heath.

It is noted that the applicant proposes to store 285,000 bottles of wine. There are already 14 vineyards in West Sussex producing bottles of wine but the applicant has provided no evidence that demand for English wines is likely to continue to rise and that all these bottles will be sold. There may arise a situation of over-supply, which happened with golf courses and has resulted in the applicant already closing part of the golf course. Should the business not meet the applicant’s expectations, then the site would be left with a large and specialised factory that would be expensive to convert to other purposes and potentially present other planning difficulties. The Parish Council therefore contends that the

applicant should provide far more evidence on the sustainability of the scheme as proposed.

7. Access to the proposed development site and traffic

The Transport Statement provided by Reeves Transport Planning unfortunately contains much irrelevant material relating to airport parking, town centres, the delivery of local bus and train services and so on, none of it pertinent to a proposed development along country lanes in the countryside. It also contains many errors of fact: such as the 18 hole golf course will be reduced in size when it was actually made 9 holes some years ago; that all the barns will be demolished when the applicant is actually proposing to leave two still standing and has stated that there will be an application to develop these two barns in the future; and that Ridgeway is open on far fewer occasions than its own website states. All this does not engender much confidence in the Planning Statement.

The Parish Council considers that as the full scope of the developer's intentions are not known because only a partial planning application has been submitted, then it is not possible to pass a view on the impact of traffic on the locality. Any future commercial activities such as a shop, food service, event venue, conference facilities would be likely to result in far more traffic than currently acknowledged.

However, there are some comments that the Parish Council would like to make. The provision of 16 car-parking spaces seems very slight given that the proposed wine factory will require parking spaces for factory operatives, office/lab personnel and perhaps security staff, in addition to the wine-tasting visitors needs for parking. The Statement mentions coaches, but there is no space allocated for coach parking. Similarly, there appears to be no space allocation for delivery lorries and vans given the huge numbers of bottles needed, the mobile bottling plant itself, and the need for the deliveries of paper, chemicals, cleaning supplies etc. Using the turning area for parking, as suggested in the Statement, hardly seems safe or practical. And then there is the need for emergency vehicles such as fire engines and ambulances to be able to turn quickly and safely. None of this seems to have been adequately addressed.

The Statement says that at a comparable wine estate (Ridgeway Wine Estate) there are between 60 and 70 movements of traffic into the site and between 60

and 70 movements out of the site per day. Some of these movements would be delivery vans, lorries, coaches, as well as cars. These figures equate to between 120 to 140 movements per day in and out of the site, and around 1,000 movements per week. If this kind of traffic volume applied equally at the Mill Farm site as the Statement suggests, then around 1000 vehicle movements per week onto the narrow and rural lanes that lead from Horsham to the site, or from the A281 at Mannings Heath to the site is deemed to be completely unacceptable to the Parish Council. And this is especially so given that for the greater part, these lanes have no footpaths and are used by cycling groups and horse riders accessing the tracks in St Leonards Forest. These figures are not “minimal” as stated in the Statement at Section 7.3 and instead present a clear safety hazard to all users of our local lanes.

Also unacceptable is the use of only three years of reported accidents near the entrance to the site at Mill Farm to suggest that nearby roads are safe. They are not. The nearby downhill section towards the Hammerpond often floods at its lowest point and is a notorious icy section and the scene of many winter accidents, whether reported or not. There has been at least one fatal accident and a helicopter call-out to injured people. The Parish Council feels that the Statement seriously misrepresents the potential dangers of this applicant’s proposals to local residents and users of the Parish’s lanes. This is contrary to policy 40b of HDC’s Planning Framework.

The Parish Council now turns to comment on WSCC Highways report. WSCC Highways has chosen to comment on matters relating only to a distance of 10 metres from the site. It does not deal with the nature of the access routes to the site. The Parish Council is therefore highly critical of this WSCC Highways Report, especially in view of the fact that it specifically asked Highways not to rely on just a desk-top exercise but to drive along all access routes in order to note their character and take them into account. The Parish Council also expected WSCC Highways to comment on the fact that this site is in an unsustainable location with no nearby public transport provision.

In fact, cars, coaches and delivery lorries can only access the proposed site along narrow, hilly and winding rural lanes that for the most part, are without footpaths. It should be borne in mind that just thinking about the equipment

alone needed for this wine factory, the stills are huge, needing over-sized delivery vehicles/trailers and cranes to put them in place.

Maps showing the WSCC Highway signage on the three possible access routes to the site are in Appendix 1 and have been provided to WSCC Highways but evidently ignored. The maps include width and weight restrictions that would exclude HGVs and coaches, advisory signs that the lanes are not suitable for HGVs and places where the lanes are frequently flooded. These maps show, without any shadow of doubt, that no access route is feasible for the size of vehicles that would be required, or the volume of visitor traffic envisaged by its provision of a wine-tasting venue and shop.

WSCC Highways also failed to note that the new, proposed access to the site is less than 50 metres from the junction of Hammerpond Road with Goldings Lane which may present as a hazard. Also, that coaches and HGVs using the narrow Hammerpond Road may well have to encroach onto the other side of the carriageway in order to turn into the site.

Good access to the site by emergency vehicles is important given the nature of the rural lanes and the dead-end layout of the site. Since it is proposed to make the development a tourist attraction, easy access/exit by ambulances should be required and given that it is proposed to build a factory with powered machinery, then fire engines should have the same ability to move and manoeuvre readily. None of this has been demonstrated as achievable by the applicant.

As the greenkeepers are scheduled to continue using some of the sheds on the site for the storage and maintenance of ride-on mowers and other equipment, this would potentially result in an eclectic mix of vehicles on site and serious safety issues, an issue not considered by WSCC Highways or the applicant.

For reasons of access and safety, the applicant should choose to develop a more sustainable site on a main road, with public transport and good links to the towns and cities that its tourists, clients and suppliers may come from.

As the applicant has already undertaken extensive work at the applicant's other site at Leonardslee, it is suggested that this would provide a far more suitable location for the new proposals contained in this planning application. At Leonardslee, a huge car-park has already been created which could easily

accommodate additional coaches, lorries and visitors' cars and it has the huge advantage of having direct access onto the main A281. Leonardslee is also in a far more sustainable location as it is on a regular bus route.

8. Economic Factors

There is no HDC report that points to any economic need for this scale of industrial development in this location.

HDC's Economic Report relating to this planning application is both brief and simplistic. It fails to acknowledge that there is no significant unemployment in the Parish of Nuthurst for this development to ameliorate. The Report does not acknowledge that the production of wine is so mechanised that, in any case, few jobs would be created. Any jobs that are created are likely to be filled by South African or other personnel already possessing the necessary specialist skills and experience, as has already happened at the nearby Mannings Heath Golf Club, which is also owned by the applicant.

The machinery and equipment for wine production largely comes from France thus yielding no economic advantage to the UK.

Creating tourism to the area is a theme promoted by this HDC Economic Report. The Parish Council views this as a totally unrealistic aspiration as the area is already short of hotel accommodation, made worse by the cessation of overnight accommodation at Brookfield Barn, Mannings Heath and the proposed closure of the Cisswood Hotel at Lower Beeding. Additionally, there are no other places near the site for tourists to visit and spend money apart from Leonardslee, which due to its hilly terrain is suitable for the fit and active only.

The Parish Council considers that the local area will not achieve any economic benefits from this proposed development, yet it would pay a considerable cost in terms of spoliation of the countryside, loss of wild-life and amenity in the Forest and increased traffic hazards. All this is unacceptable.

9. Effects on neighbouring properties

This planning application has come as very unwelcome news to residents living in the four nearby properties. In effect, two of the properties, 1 and 2 Mill Farm Cottages, are part of the development site. The large factory plant will be to the

rear of their homes and given its height, very visible. The traffic and lighting on site are likely to extend from 5.30am when the greenkeepers arrive until the wine-tasting venue closes and potentially longer, if this wine-producing factory operates continuously over 24 hours, and is manned. This is an excessively long period of time for residents of Mill Farm Cottages to be subjected to other people's noise and activity, especially when they are used to quietness and dark surroundings at night-time.

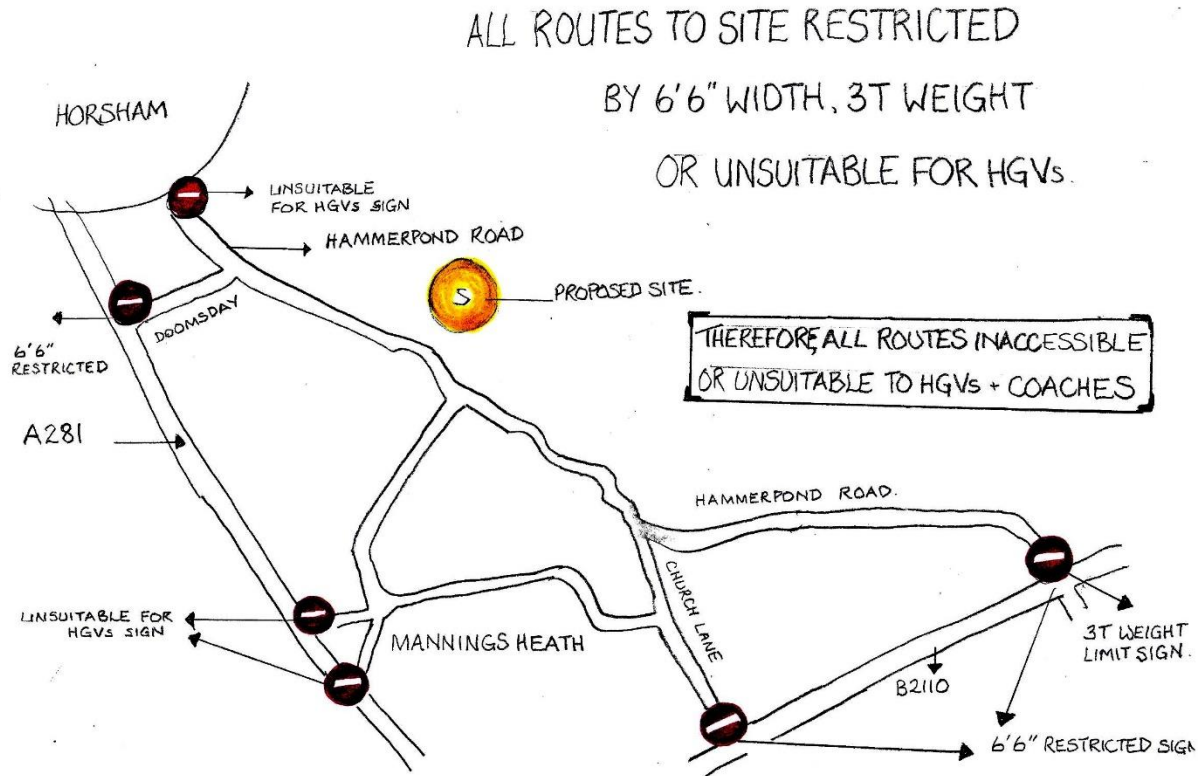
The Parish Council views this proposed development as a complete disaster for these nearby residents and thus giving yet another reason why the applicant should seek for an alternative site elsewhere.

10. Conclusion

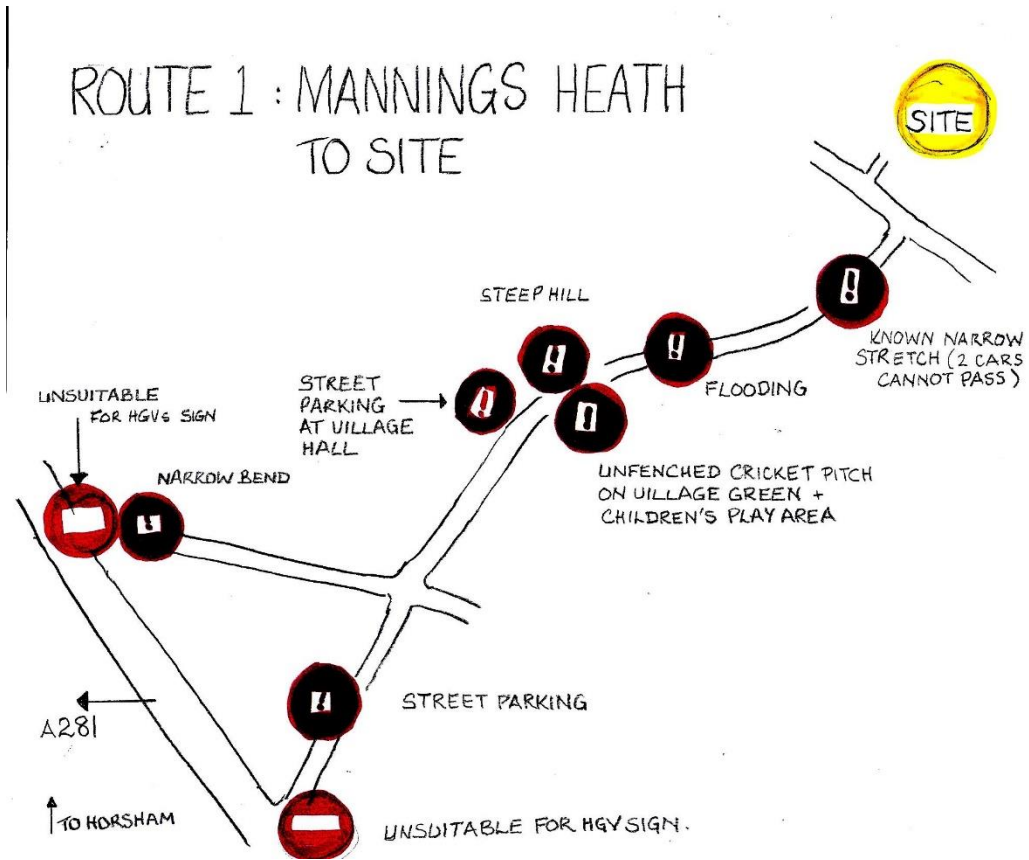
The Parish Council agreed that this planning application has no positive features and indeed contains very many highly problematic proposals. It would have enormous adverse consequences for the settlement of Mannings Heath, its rural hinterland, landscape and wildlife. Harm would be created to the area's relative peace, tranquillity and safety because of traffic, some of which would be HGVs and tourists travelling along its rural lanes. This traffic would be to support an industrial business that is not appropriate and for which there is no proven need in the area, and the application proposes commercial activity that merely duplicate what the applicant is already providing nearby.

The Parish Council therefore strongly urges HDC to refuse this application as it is so demonstrably unsuitable in scale and location.

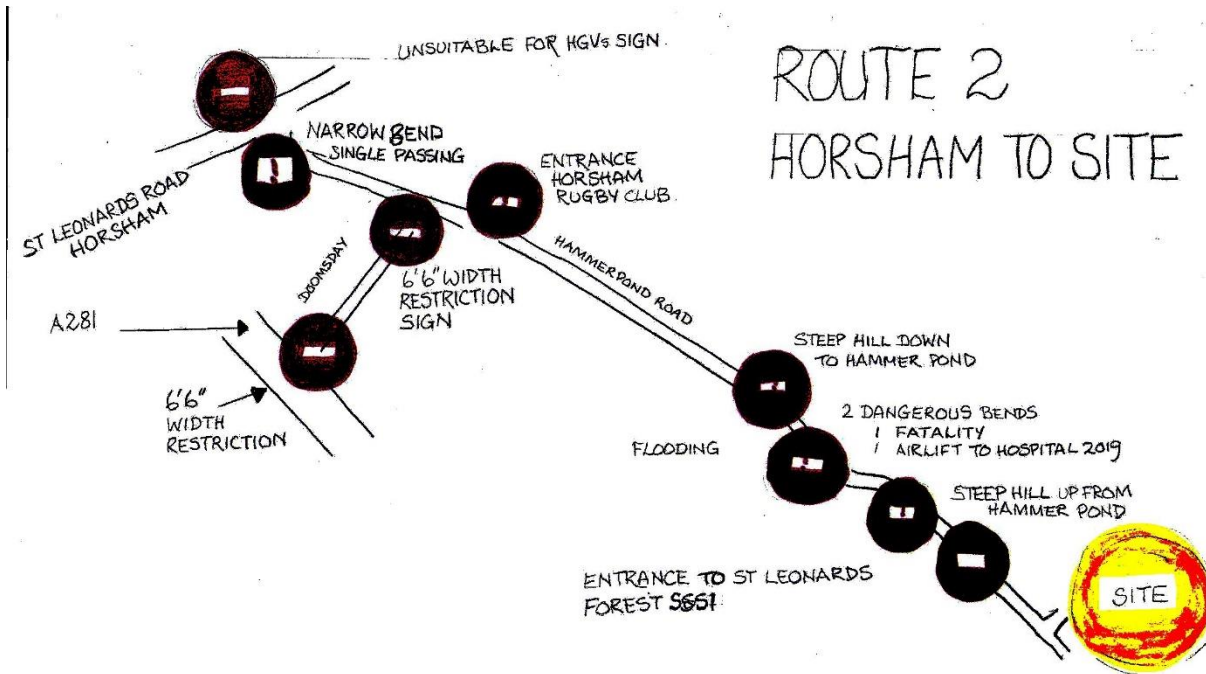
Appendix 1: Maps showing the WSCC Highways signage on the possible access routes to the site



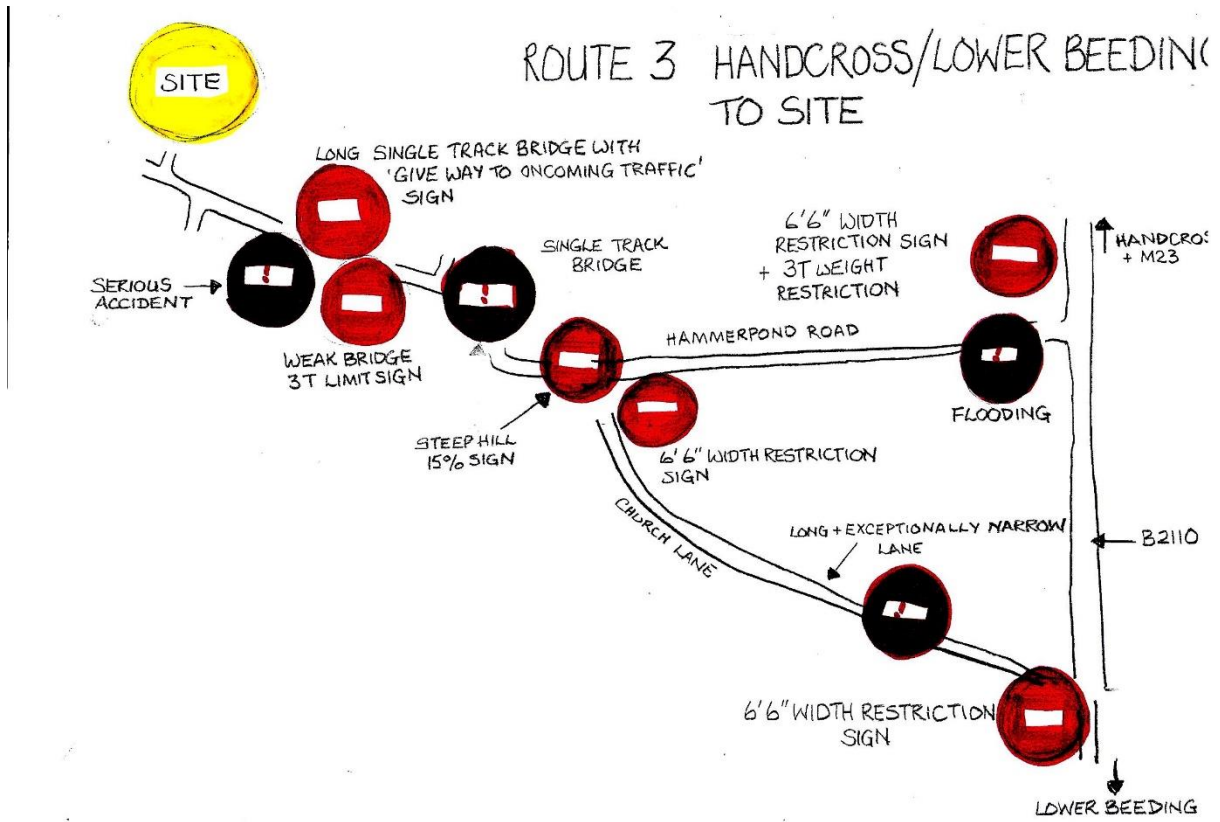
Map showing all access routes to the proposed site



Access route 1 through Mannings Heath village from the A281 to the proposed site via Golding Lane



Access route 2 from St Leonards Road, Horsham or Doomsday to proposed site via Hammerpond Road



Access from Lower Beeding/Handcross Road to proposed site via Church Lane or Hammerpond Road