## DC Admin

**Sent:** 29 January 2026 22:57
**To:** DC Admin
**Subject:** Public Consultation response re 2024/93494

I detail below my formal objections on the above application

Comment on Wheawill & Sudworth review (W&S Rev) of the BJA Business Plan (BJA Plan):
The above document was submitted as evidence on viability of the above development; the review highlights several short comings in the submitted business plan.
Whilst some W&S points were addressed (and the impact reflected in their review) other matters remained unresolved at the time of issuing the review (15 Nov 2025).
Remaining key uncertainties, identified by W&S as affecting viability include:
- the general viability of entities operating in the leisure and hospitality sectors and,

for the specific development:
- take up and sustainability of customer demand and spend relating to the CHVC facilities, plus
- lack of clarity regarding current funding

The review rightly details specific documentation relied upon but also makes clear such information has NOT been subjected to any form of audit verification.
It is clear the financial plan and third-party review do not deliver the required measure of confidence, on the viability of the proposed development, without further clarification on various outstanding matters.
Lack of clarity around the operational model:
One aspect, which the W&S Rev highlights (within the 2nd para of point 5) is the impact on CVHC overall "because the restaurant/bar generates the bulk of the turnover and profit for the public (typo corrected) sector part of the project".
This suggests the development is being designed to operate as 2 separate elements, with the latter relying on the ongoing survival of the former. It is unclear how this model ensures delivery of the required 'very special circumstances' necessary to justify an inappropriate development within the green belt (NPPF 153).
Given the previous Executive Summary that Historic England based their letter of the 8th August 2024 on and was provided to the public as justification for acceptance of the project, e.g. the project would be wholly under the control of the CHVC CIC (reference Castle Hill Business Case: Executive Summary, Project Overview, date June 2025).
It is concerning that the business model appears to have changed without the public having any opportunity to review and comment on a revised model, specifically what the CIC will have responsibility for and what the commercial party is responsible for.
The absence of evidence on long-term viability means the applicant has not demonstrated 'delivery' of benefits necessary to justify planning approval for an inappropriate development in the Green Belt.
KMC Consultee Response:
I point out below two related aspects, included in the consultee response from KMC Conservation & Design. Whilst dated 21 Nov 2025, this was not added until 16 dec 2025 and I received no notification of this item being added to the application.
1. On page 3 of the response (under Policy) specific comment is made regarding the introduction of a new building in the proposed location based on claimed public benefits:
"While the introduction of a new building in this location does create harm, the application provides some justification based on its design ethos and the claimed public benefits (such as toilets refreshments and

interpretation areas). However, from a heritage perspective this does not amount to clear and convincing justification. There is no supporting evidence that these facilities are required or demanded."
I echo the above observations and would further support this challenge by drawing attention to the high level of objections submitted against this application (plus 300+ against the prior 'time expired' application). This is clear evidence that there is not a groundswell of requirement/demand – in truth quite the reverse!
2. Further down in the KMC response, reference to LP35 makes the following comments:
"It is considered that the introduction of a building within this location would result in harm to the setting of the monument. The proposal cannot be regarded as preserving or enhancing the significance of the heritage asset…… enhancements are minimal and do not outweigh the identified heritage harm when assessed in accordance with relevant planning policy"
I wholly support this second comment. Given the application was submitted on the basis that the site represented Grey Belt (rather than Green Belt). Any development site, within the centre of a Scheduled Ancient Monument, CANNOT be designated a Grey Belt site!
I submit, given the comments above, the current application has no justifying case for construction within the Green Belt and should be rejected.