

STORRINGTON & SULLINGTON PARISH COUNCIL
THE PARISH HALL, THAKEHAM ROAD, STORRINGTON, WEST SUSSEX, RH20 3PP

www.storrington-pc.gov.uk

Telephone: 01903 746547 e-mail: office@storrington-pc.gov.uk

F.A.O. Horsham District Council Strategic Planning Team

20th March 2020

Dear Sir/Madam.

HDC's Local Plan Review 2019 – 2036

We are writing to you in response to the Local Plan currently out for consultation. We have already responded in respect of housing numbers but wish to state separately our **very serious concerns** over the cumulative effect of the developments proposed.

As you know, Storrington acts as a hub for surrounding villages that use its services – in particular Thakeham, West Chiltington, Ashington and Washington.

There is a total of some 1300 houses proposed in these villages, in addition to the 100 proposed for Storrington itself. 1300 hundred houses, providing some 2600 cars, coming into Storrington to a supermarket that cannot cope now, where parking is already under pressure, to doctors where it can take a considerable time to get an appointment, dentists that are already struggling... Our schools are full, as are senior schools. We have not seen any serious assessment of the cumulative effect of these proposals.

As there is a very poor public transport system, it is inevitable that these residents will be reliant on private cars.

As you know, Storrington has an AQMA and it has so far proved almost impossible to find any effective, significant measure to improve the poor air quality, which is caused in the main by traffic. Our roads, at certain times of the day, are already gridlocked. We fail to understand how we can ever improve our air quality if this level of development is imposed on us.

The Government's requirement for housing is simply not compatible with its requirement for the improvement of air quality.

It is all very well saying that developers have to do air quality assessments and provide mitigation but what is that mitigation to be? A Low Emissions Zone was tested and found not to be suitable for this area. Gating was considered and rejected as it was not popular with the public and it was considered that it would be difficult to enforce. Of course, banning all diesel cars from the AQMA would work but we cannot imagine that being acceptable to residents or enforced by the police!

So, until the A27 is improved Storrington continues to be used as a rat-run yet we are to have all this additional traffic imposed on an already inadequate road network.

We would therefore like to see a comprehensive analysis of the cumulative effect on Storrington of all development in the surrounding villages that it serves.

We would also like to propose that part of the Section 106 and CIL monies from development in those surrounding villages should be allocated to Storrington as it is quite clearly unfair that the residents of Storrington should bear the burden of funding services that are used by residents of other villages who do not contribute to them.

We ask that you reconsider the level of development proposed in this Plan and make a proper assessment of the cumulative effect on Storrington but also on the district as a whole.

Yours sincerely

A solid black rectangular box redacting the signature of the Chairman.

Chairman of the Parish Council and Chairman of the Planning & Development Committee

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20th March 2020

Dear Sir/Madam,

HDC Local Plan 2019 – 2036 Review

Firstly, we wish to object to the numbers put forward for housing in the district as a whole. We do not consider that Horsham district should have to accept development from neighbouring authorities and contend that it should only provide development for its own needs. That said, we question the need for the additional numbers stated and would ask for evidence that this number is required for local needs.

The proposed numbers in the Plan are contrary to HDC's stated Vision for Rural Areas. The Plan talks at length and repeatedly about development having to be "sustainable" and "appropriate". These proposals go directly against that stated objective by threatening to destroy large swathes of rural, unspoilt countryside and destroying the character and individuality of the towns and villages that make up the district. Much is made in the Plan of the Horsham district being a desirable place to live. If this level of development is allowed to go ahead that will no longer be the case.

Most of the large developments proposed (and many of the smaller ones) are not near established places of work or public transport links and will therefore inevitably increase the traffic on our roads and affect the already poor air quality in some areas. They will also increase pressure on our already struggling infrastructure – our schools are full, doctors' appointments hard to get, we have regular flooding in some areas and little public transport. The list goes on...

We are told that some developers have now stopped building as they are unable to sell the houses already built so we ask, if that is the case, how can we possibly need the numbers of houses proposed? How can this level of house building in this locality possibly be sustainable?

Finally, these proposals in the villages with 'Made' Neighbourhood Plans and those in the process of developing their Plans make a mockery of all the hard work that has gone into and is going into these Plans.

Neighbourhood Plans are statutory planning documents and we believe that HDC has a duty to uphold them and refuse sites that are not included in them otherwise we question the point of them.

We wish to object to the sites specifically allocated for this parish for the following reasons:

Land off Fryern Road (60 houses)

This site was extensively assessed under the Neighbourhood Plan and **rejected** on the following grounds:

- Negative effects on rural nature of the area
- Visible from the National Park
- Reduces the gap between Storrington and West Chiltington Common
- Would significantly alter the existing pattern of development
- Lack of safe and secure pedestrian access to the site and the village
- Effect on air quality
- Negative effect on sustainability objectives

The site is allocated in the Neighbourhood Plan as being part of the protected gap between Storrington and West Chiltington.

The site was previously the subject of 2 separate but almost identical applications for 160 houses, both of which were refused by HDC for the following reasons:

- Outside the BUAB, in the countryside and therefore contrary to policies 1, 2, 3, 4, 15 and 26 of the HDPF.
- Not allocated in the Neighbourhood Plan or the Local Plan.
- Unsustainable location.
- Uncharacteristic urban development, harmful to the local landscape and therefore contrary to policies 4, 25 and 26 of the HDPF.

WSCC Highways objected on the grounds of road safety, no footpaths and therefore danger to pedestrians walking in the road.

Land to the north of Melton Drive (60 houses)

This site was extensively assessed under the Neighbourhood Plan and **rejected** on the following grounds:

- Negative effects on rural nature of the area
- Proximity to a Grade II* listed building and negative effect on its setting
- Increase in traffic and unsuitability of proposed access roads
- The proposed site would have a negative effect on the sustainability objectives in the SA framework

The site is allocated in the Neighbourhood Plan as being part of the protected gap between Storrington and West Chiltington.

This site has previously been the subject of an application for 102 houses and another for 67 houses, both dismissed. The former application, for 102 houses was also refused at appeal on the following grounds:

The 1990 Listed Buildings Act imposes a duty on the decision-maker to have special regard to the desirability of preserving the setting of listed buildings. English Heritage concluded that harm would be caused to the setting of the Grade II* listed building of West Wantley House.

The Inspector agreed that “the isolated rural setting is a very important part of the asset’s significance as it provides its historic landscape context. The proposed development, in such close proximity, would inevitably affect this significance due to changes to the character and appearance of the setting and appreciation of the sense of rural isolation. Indeed, not only would the

development be clearly visible from the public right of way that runs to the immediate south of the listed building and, at present, contributes to its isolated sense of place, but it would also *erode to a harmful degree the separation between the listed building and the built-up area of Storrington*. Moreover, the historic functional relationship of the principal southern elevation of the house with the open former farmstead land that it faces, including the appeal site, would be adversely affected. an impression of dense residential development in close enough proximity to denigrate the sensitive rural setting of West Wantley House would be readily apparent from the upper floors of that property and the adjacent public right of way”. ... “... it is not clear to me how design alone may safeguard the setting of West Wantley House. I conclude... *that the level of harm would be ... significant and irreversible*”. As such he found the proposal to be contrary to the NPPF.

With regard to the impact of the proposal on the surrounding rural landscape, the Inspector considered that “The appeal site ... reads clearly in the Fryern Road street scene as the beginning of the countryside beyond the northern perimeter of Storrington village. The wider landscape ... is attractive and *resolutely rural in character*”. He also stated that “*residential estate development outside the defined built-up area of the village will inevitably and irrevocably change the character and appearance of the countryside...*”.

He concluded that “the proposal would *cause substantial harm to the character and appearance of the appeal site and the surrounding area...contrary to* [various policies of the then Local Plan] the Parish Design Statement and the *relevant provisions of the NPPF*”. He attributed “*very substantial weight to this consideration*”.

He further concluded that “... the adverse effect of the proposal on the character and appearance of the surrounding area and the setting of the nearby Grade II* listed building would result in *considerable environmental detriment*.” I conclude that ... these two negative factors clearly outweigh the relatively limited environmental attributes of the scheme and the economic and social advantages summarised above. ... I find that the *appeal proposal would not constitute sustainable development* in the terms prescribed by the NPPF and contrary to ... the Parish Design Statement. Bearing in mind the presumption in favour of sustainable development inherent in the NPPF, *I attribute very substantial weight to this finding*”.

His final conclusion was “*the appeal scheme is contrary to the relevant provisions of the NPPF...*”.

NONE OF THESE REASONS FOR PREVIOUS REFUSAL HAS CHANGED.

Since this appeal was refused the Neighbourhood Plan has been “Made” and it specifically rejects both of these sites. We therefore contend that these 2 sites must both be rejected for development.

Land at Northlands Lane (60 houses)

This site was not put forward under the Neighbourhood Plan and therefore not considered.

However, we believe it should be rejected for the following reasons:

- It forms part of the protected gap between Storrington and West Chilton.
- It is close to the listed building of East Wantley and would be harmful to its setting.
- There is no access to this site from an existing road and if access were to go through the neighbouring allocated site at Downsview Avenue this would create an uncharacteristic development and potentially reduce the number of dwellings possible on that site.
- It is established that there are dormice present in the adjacent woodland, together with bats and badgers. Development on both sides of their habitat would leave them cut off and vulnerable.

- The bottom corner, adjoining Northlands Land is prone to regular flooding.

Policy 35 states:

- “Proposals which would cause substantial harm to ... a heritage asset will not be supported unless it can be demonstrated that the substantial public benefits gained would outweigh the loss of the asset...”

As stated above, it has already been ruled at appeal that the harm of development on the Melton Drive site to the Grade II* Listed Building Wantley House would be “... *significant and irreversible*” and that the benefit was not considered to outweigh the harm. Adding another two sites in the immediate proximity would simply add to this. It would also have the same “*significant and irreversible*” impact on the Listed East Wantley.

Storrington, Sullington & Washington have a ‘Made’ Neighbourhood Plan. ALL THREE of these sites fall within the protected green gap accepted in that plan, to prevent the coalescence of Storrington and West Chiltington. ALL THREE sites are therefore unacceptable and should be excluded.

The Local Plan Review states that it will:

- “...promote *development* which is *appropriate*...”;
- “Identify and preserve the unique landscape and character and the contribution that this makes to the setting of rural villages and towns and *ensure that the development minimises the impact on the countryside*”;
- “*the landscape in some areas also acts as an important visual break, separating smaller and larger settlements*”;
- “the potential for development to result in small changes that cumulatively impact on landscape settlement character and the natural environment will be a key consideration”;
- “Maintenance of the existing settlement pattern is a *key objective for the Council* and in particular *maintaining the separation between settlements*”.

It also states that “future development should respond appropriately to local character and local needs”.

Policy 28 states:

- *Outside built-up area boundaries... the rural character and undeveloped nature of the countryside will be protected against inappropriate development*”.

Policy 29 states:

- “*The undeveloped nature of the landscape between towns and villages will be retained*”;
- “*Landscapes will be protected from development which would result in the coalescence of settlements in order to protect local identity and a sense of place*”.

The use of ANY of these sites would **be directly contrary to the stated objectives of the Plan.**

The Plan repeatedly talks about the impact of development on infrastructure and in particular air quality. **It states in Policy 17:**

- “... *the impact of development on transport levels and air quality is therefore a key consideration*...”.

In Policy 25 it states:

- “Development plans must ensure that they:

... Contribute to the implementation of local Air Quality Action Plans and do not conflict with their objectives...”

Storrington has an AQMA and whilst the Plan talks about developers having to “mitigate” any impact on air quality there is not even a hint of what that mitigation might be...

Poor air quality is mainly due to traffic, so adding an additional 2500 plus cars to our roads will inevitably make it worse.

Storrington & Sullington’s Chairman is also Chairman of the Air Quality Steering Group and therefore fully aware that there are severe limits on what can be done to ‘mitigate’ air quality, so it is absolutely not acceptable to imply that money can resolve the problem. It cannot.

All three of these sites are outside the BUAB, on roads where there is no footpath and limited public transport and would result in future residents using their cars to go into the village, into the AQMA. The addition of a further 100 houses would result in at least a further 200 cars, the impact of which would be significant on both air quality and the local road network.

As for infrastructure, the Plan states, in paragraph 10.2:

- “... it will be essential that new development ... does not create any additional burdens [on infrastructure].

Paragraph 10.4 states:

- “Developers ... should demonstrate that there is adequate capacity both on site and off site for all forms of infrastructure ... and that it would not lead to problems for existing users...”.

Storrington has a supermarket that cannot cope with the current demand – shelves regularly half empty, no storage, etc. Our schools are full, as are the senior schools, there is limited car parking, very limited public transport, the list goes on... So, unless the developers intend to build a new supermarket and a new school and provide additional public transport, how can they ensure “that there is adequate capacity both on site and off site for all forms of infrastructure ... and that it would not lead to problems for existing users...?” There are *already* problems for existing users...

Finally, the Plan states in Policy 25 that it will “**Ensure that the cumulative impact of all relevant committed development is appropriately assessed**”.

This Plan allocates a further 100 houses to Storrington & Sullington, on top of those already allocated in the “Made” Neighbourhood Plan. It also allocates a further 400 for Ashington (in addition to the 225 in their Neighbourhood Plan currently being drawn up), a further 50 for Thakeham, which has already allocated 300 and a further 25 for West Chiltington. **This makes a total of at least 1100 additional houses in villages that rely on Storrington for all of their services.** A further potential 2200 plus cars coming into the AQMA, using our doctors, dentists, shops, schools, car parks, etc... Where is the cumulative assessment of the effect of these 1100 houses? Where is the money to spend on infrastructure? Where is that infrastructure to go? How has the effect on existing residents been assessed? Where is that assessment? What measures are proposed to deal with the effect on our air quality? How is the effect on our road system to be handled?

Storrington & Sullington Parish Council wishes to lodge a very strong objection to the allocation of the 3 sites within its parish but also to the allocation of a further 1100 houses in the parishes for which it serves as a hub.

Our Neighbourhood Plan was "Made" less than one year ago, yet Horsham District Council, which was heavily involved in drawing up the plan and assessing the sites, is already preparing to go against it and this is utterly unacceptable. It makes a mockery of the Neighbourhood Plan and of all the work that went into producing it. 2 of these sites were unacceptable a year ago and are still unacceptable. The 3rd was not even considered.

We believe that we can accommodate the additional 100 houses required of us on existing sites within the BUAB and that we do not need or want to use these greenfield sites, located in the protected gap between Storrington and West Chiltington.

Our Neighbourhood Plan is to be reviewed in due course and we believe that until it is, Horsham District Council should respect the plan and abide by the policies in it.

Yours faithfully


A large black rectangular redaction box covering the signature of the Chairman.

Chairman of the Parish Council and the Planning & Development Committee

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F.A.O. Horsham District Council Strategic Planning Team

14th April 2020

Dear Sir/Madam,

HDC Local Plan 2019 – 2036 Review

With reference to our previous comments regarding the abovementioned review, as addressed in my letter dated 20th March, I would like to make the following comment on behalf of all Members:

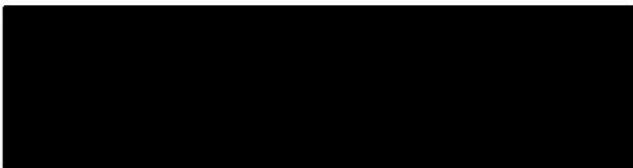
As previously mentioned in great detail, two of the three sites proposed for development were reviewed and excluded from our Neighbourhood Plan and therefore were not put forward as strategic sites. HDC's revised Local Plan has not yet been adopted and we feel that your attention should be brought to **Page 10 point 30.** of the **February 2019 NPPF** under "**Non-strategic Policies**" which states:

"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently."

Bearing in mind our Neighbourhood Plan was "made" on 5th September 2019 and HDC's Local Plan has not yet been adopted, Members feel very strongly that the above point (as mentioned in the NPPF) should be given significant weight and taken into consideration when decisions are made as to which sites should be put forward and believe that HDC should abide by the Neighbourhood Plan, which it helped to formulate.

As such, Members wish to reiterate their **strong objections** to the inclusion of all three sites (**Land off Fryern Road, Land to the north of Melton Drive and Land at Northlands Lane**) and urge HDC to reject them accordingly.

Yours faithfully



Chairman of the Parish Council and the Planning & Development Committee



[Redacted]

From: Barbara.Childs <Barbara.Childs@horsham.gov.uk>
Sent: 09 July 2020 10:01
To: Tracey Euesden
Cc: [Redacted]

Subject: RE: Local Plan Preparation information request

[Redacted]

Thank you for your recent email with a copy of a response to our Local Plan consultation and the more recent response as part of our work to understand the infrastructure issues across the district. I can confirm copies of both are held by the Strategic Planning team. I also understand that the Strategic Planning team acknowledged your recent submission in an email dated 01/07/20.

In terms of the Local Plan representation, I have reviewed the documentation you sent to us. I note that your response was initially sent directly to Liz Dalrymple White who works in the Development Management team. Liz confirmed safe receipt and copied in Strategic Planning officers directly but I recommend that you use the Strategic Planning email address in future if you have Local Plan queries or comments to make sure that it gets to the right officers as soon as possible - strategic.planning@horsham.gov.uk

We received over 6000 comments in response to the Local Plan consultation. You can view an initial summary of the type of comments made from this link:

<https://www.horsham.gov.uk/planning/local-plan/regulation-18-consultation>.

You can also access the comments you and others made on the consultation via links on this page. If you wish to view your comments online, you can search for them using your Comment ID of 6190.

Our resources do not enable us to respond to all issues that have been raised on an individual basis. However I can confirm that all representations, including yours, are being taken into account as we progress to the next stages of Local Plan preparation. We are acutely aware of the cumulative impacts of growth across the District. The wider role that Storrington and the other market towns play is an important characteristic of our District and this is an issue which we are investigating and need to plan for.

Kind regards

Barbara

Barbara Childs
Director of Place

Telephone: 01403 215401
Email: Barbara.Childs@horsham.gov.uk



Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Glen Chipp

From: [Redacted] <[Redacted]@storrington-pc.gov.uk>
Sent: 01 July 2020 14:21
To: Barbara.Childs <Barbara.Childs@horsham.gov.uk>

Cc: Storrington & Sullington Clerk <office@storrington-pc.gov.uk>; '.hdc [REDACTED]

<anna@storrington-pc.gov.uk>;
<[REDACTED]@storrington-pc.gov.uk>; Cheryl Brown <[REDACTED]@storrington-pc.gov.uk>;
<joel@storrington-pc.gov.uk>

Subject: FW: Local Plan Preparation information request

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Dear Barbara

I hope my email finds you safe and well.

I refer to HDC's letter (Local Plan Preparation information request -Infrastructure and Settlement Sustainability) copy attached.

Whilst I have responded to the Strategic Planning Team seperately today (wih as much information as it is reasonable to expect from a local level), I have been asked to bring to your attention the attached letters from the Parish Council.

The first was sent as part of the Parish Council's response to the Local Development Plan Consultation but to date we have not received a response. The second letter highlights the challenges and pressures imposed upon Storrington in its role as a "Hub" to surrounding parishes. The Parish Council seeks assurances from HDC that these matters are being addressed as part of the Local Plan Review and that a full assessment of the cumulative impact upon Storrington of further development is to be undertaken.

Kind regards

[REDACTED]
Parish Clerk

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