

This plan repeatedly refers to Neighbourhood Plans and the importance of them. Why then are they being ignored? Some sites have been excluded because they are not allocated in a Neighbourhood Plan yet others not allocated have been included. The plan is utterly inconsistent and is an insult to all of us who spent years working on NPs and to the public who supported them in a referendum.

At the consultation stage, I stated that we could make more use of the sites that are included in the plan, along with others within the BUAB, to meet the additional numbers imposed on Storrington, which, furthermore, would be in line with the requirement to make the best use of land. We have already identified a further 72 houses in addition to those contained in the NP. This has been completely ignored.

The land north of Melton Drive was not only excluded from the NP, but 2 applications for the site were refused by this council *and* refused twice at appeal, the Inspector stating that the proposal was contrary to the NPPF as it did not constitute sustainable development in the terms prescribed by the NPPF. He stated 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”* and that the wider landscape ...is *“resolutely rural in character”*. He 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...”* Yet suddenly none of this applies?? Is it now not contrary to the NPPF??

§7.6 and § 7.18 both seek to maintain separation between settlements – then the plan includes this site within the one protected landscape gap designated in the NP – the gap between Storrington & West Chiltington. The Plan repeatedly talks about protecting the countryside, protecting the environment and the historic nature of the area. Your officers themselves concluded that this site would have a negative effect on sustainability objectives ... Policy 28 also seeks to resist development between settlements.

What is the point of drawing up such policies on one page and then ignoring them on another?

Storrington has a declared AQMA and Strategic Policy 25 states that proposals will *“Ensure that the cumulative impact of all relevant permitted and allocated developments including associated traffic impact is appropriately assessed”*. So what is the cumulative impact of the 145 houses proposed for us, along with all those in the NP? Not to mention those proposed in other surrounding parishes that use Storrington as a hub. I can only assume that officers think this will improve air quality...

So, this site is contrary to Policies 3, 25, 26, 27 and 28 of the very Plan that proposes it...

The site at Rock Road is also outside the BUAB and many of the points made above apply equally to this site. It is not included in the Thakeham NP or in the SSWNP. It is in the countryside and therefore contrary to Policies 3, 26 and 27.

In your own document reviewing BUABS you state: *“Settlement Coalescence: Sites which significantly reduce the break / openness between settlements – **exclude**; Sites which generate urbanising impacts in settlement gap beyond the development – **exclude**.*

Once again, by including these sites you are ignoring the criteria that you yourselves have established.

With regard to the historic environment, this document states that amendments to the BUAB which would have a significant adverse impact on the historic environment, including harm to listed buildings, (e.g. the setting of a listed building outside but close to the BUAB) should be excluded. The Melton Drive site affects the setting of 2 Grade II listed buildings.

It is also listed as a Bat Sustenance Zone (as is the Rock Road site) and is land that supports Bewick Swans. Their development would therefore negatively impact the Arun Valley SPA, yet this too has been ignored.

Whilst we understand the importance of having a Local Plan, we need one that does not contradict itself throughout and respects and protects the district's residents and this is not it. Storrington & Sullington Parish Council cannot support this Plan as it stands. The only way we could support it is if these sites were removed and the Parish Council were allowed to meet the numbers required from the sites in the NP and others identified since, in line with the stated policies of the Plan.

I would remind all councillors that they have been elected to represent the public [REDACTED] They should vote for it to be reviewed so that its own policies are respected and our district is put first.

## STORRINGTON & SULLINGTON PARISH COUNCIL

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

20<sup>th</sup> 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 Chiltington.
- 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 [REDACTED]. 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 3<sup>rd</sup> 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 Chilmington.

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



Chairman of the Parish Council and the Planning & Development Committee



# STORRINGTON & SULLINGTON PARISH COUNCIL

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## CHAIRMAN'S PAPER

Barbara Childs  
Director of Place  
Horsham District Council

12<sup>th</sup> November 2021

By email

Dear Barbara,

You will not be surprised to hear that we are very unhappy with your response of 27 October 2021 to my letter of 14 September summarising the discussions in the meeting about the Local Plan.

I would comment as follows, using the headings in your letter:

### **Horsham District Council Site Assessment process**

You state that: “the purpose of the assessment criteria is to ensure that the consideration of each site has been undertaken on a consistent basis, taking into account the provisions of the NPPF.”

However, we do not feel that this process has been consistent in relation to sites in our parish or that it takes proper account of the provisions of the NPPF.

For example, you stated in our meeting that the site at Bax Close had been discounted because of the presence of a listed building. You also state, in relation to Old Clayton, that it is “a Grade II listed heritage asset ... and any proposal would need to be respectful to preserving the context and *wider setting* of the listed building and the historic farm complex”.

Yet you continue to consider the Melton Drive site appropriate, despite the presence of THREE listed buildings and the proposal to build within its *wider setting*...

You are also failing to comply with the NPPF requirement to make the best use of land.

We therefore contend that any inspector would find the process inconsistent and the proposed plan non-compliant with the NPPF.

As for the sites:

### **Ravenscroft**

The Neighbourhood Plan originally included this site for 70 homes. This was reduced to “at least 35” following objections from the SDNPA. However, the Examiner stated in his report:

*“I feel that the site could have some potential to increase its contribution to housing numbers, depending on the mix of units put forward. **Whilst the site may be able to accommodate 35 four-bedroom units, equally it could achieve a greater number of smaller units** within the same site area or indeed within the same building footprint, **for example if it incorporated small terraced houses or flats....** The Qualifying Body could, if it had wanted, have promoted a predominantly affordable housing scheme by designating the site... as a rural exception site under the provisions of Policy 17 of the HDPF.”*

The application currently lodged consists of:

|             |    |
|-------------|----|
| 1 bed flats | 12 |
| 2 bed flats | 18 |
| 2 bed house | 14 |
| 3 bed house | 27 |
| 4 bed house | 7  |
| Total:      | 78 |

This therefore complies fully with the Examiner’s statement that if it did not consist of 35 x 4-bed houses it could easily accommodate higher numbers. It has only 7 x 4-bed houses. The proposed density is 41 dph whereas the existing density of surrounding development is an average of 42 dph so once again this is entirely in keeping with the surroundings. Any lower numbers, leading to lower density, would be out of keeping with the immediate area and would fail to make the best use of the land as required by the NPPF. In line with the Examiner’s comments most houses are semi-detached or small terraces with very few detached houses.

Paragraph 125 of the NPPF states: *Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions **avoid home being built at low densities and ensure that developments make optimal use of the potential of each site...** Local planning authorities should refuse applications which they consider fail to make efficient use of land...”*

By refusing to consider the higher number you are failing to comply with the NPPF.

The argument that the site is visible from and detrimental to the SDNP is ridiculous. From the top of the Downs it is possible to see the whole of Storrington, Pulborough, down to Bognor, Worthing etc. Why was the Rampion windfarm not refused because it is visible from the Downs? It is ludicrous to suggest that an additional 35 houses on the same site will be noticeably discernible in the landscape. In fact, when looking down towards Storrington from the top of the Downs the thing that attracts the eye is the unsightly industrial estate in Greyfriars Lane! The proposed housing would not extend beyond the existing building line and would not be prominent in the landscape.

### **Bell Acre (Ryecroft Allotments)**

I have lost count of how many times I have stated that we have written proof that the flood risk assessment done on this site was incorrect. I attach a letter from the Environment Agency stating that they would have no objection on the grounds of flood risk...

You state that the principle of development of this site is accepted because it is within the BUAB and “can come forward now without any specific need for the site to be allocated”.

Can you please point me to the legislation that states development within the BUAB cannot be counted towards overall numbers if specifically allocated?

Regardless of this we would question how, if you believe the site unsuitable for development due to the risk of flooding, you have felt it appropriate to sell it (jointly with the PC) for residential development?

You go on to state that: “Sites which come forward for homes without a specific allocation are known as “windfall” developments. ... A specific allocation of Bell Acre would reduce the ability of the Council to deliver against the windfall target in the plan. This means that other land would need to be identified...”.

As you know, we originally allocated this site in the Neighbourhood Plan for around 20 houses and it was precisely because of the incorrect flood risk assessment that it was excluded by the Examiner. We were told by HDC that windfall sites were any sites accommodating fewer than 6 houses. Bell Acre can accommodate around 25 so we do not understand how this can be classed as windfall. Nor do we understand how or why you continue to rely on an incorrect flood risk assessment. We also do not understand how you are able to choose which sites you allocate and which you consider windfall. Again, please point me to the relevant legislation.

### **Luckings Yard**

Again, this could accommodate around 15 houses so does not classify as windfall according to the criteria you established for the Neighbourhood Plan.

The Examiner, in his report, stated: *“I do not know the reason why the Qualifying Body did not equally seek to allocate the Lucking’s site. That equally would, in my opinion, be a sustainable housing site along with other locations in the immediate vicinity”*.

We therefore consider that this site should now be allocated.

### **Old Clayton**

Given that Milford Grange was allowed at appeal and considered suitable for development we are at a loss to understand your reasoning that Old Clayton is not or why a similar decision should not result from any appeal.

Furthermore, this is a brownfield site and the NPPF states that “planning policies and decisions should promote an effective use of land ... in a way that makes as much use as possible of previously developed or ‘brownfield’ land”.

In refusing to consider this site you are not complying with this requirement of the NPPF.

### **Chantry Lane Industrial Estate**

You state that one of the considerations is that no site has been identified as an alternative for the current business use.

Can you please give me a summary of how this has been progressed? What conversations have been held with the owner? What sites have been considered?

The owner is keen to develop the site and has been for many years. He owns other sites and has indicated in the past that the business can be re-allocated.

We would also point out that this did not seem to prevent the Thakeham Tiles site from obtaining residential planning permission, despite offering no alternative employment site.

We accept that this site is more difficult because a safe form of access would need to be provided but we do not believe this to be impossible. It seems that because it would be more problematic it has simply been discounted.

Again, this is a large brownfield site, very close to the village and failure to consider it goes against the requirement of the NPPF to prioritise brownfield sites. Once again you have failed to take account of the provisions of the NPPF.

### **Land at Melton Drive**

You state that because the site is further from the SDNP there are fewer landscape impacts than with other sites.

That may be an argument when viewing it from the Park but it is not an argument from a local perspective.

This site, although adjacent to the BUAB, is in the countryside. Not only is it in the countryside but it forms part of the only green gap supported by the Examiner of the Neighbourhood Plan.

The Examiner, referring to green gaps, stated:

“It is important to recognise that this is ... **a policy which is to protect especially vulnerable areas from built development**”. He therefore approved the following wording:

*Policy 9: Green Gap*

*Development between Storrington and West Chiltington will be resisted in line with Policy 27 of the Horsham District Planning Framework which seeks to prevent the coalescence of rural settlements.*

I attach a copy of the map designating this green space and as you can see the whole of this site forms part of that green space.

It is therefore unacceptable that you now want to ignore this.

I would draw your attention to the very recent appeal decision relating to the Copper Cabin and Geodesic Dome on land to the east of Fryern Road (Appeal Ref: APP/Z3825/W/21/3271720), dated 19 October 2021. This appeal was dismissed and the Inspector stated the following:

*“14. Policy 27 of the HDPF is designed to prevent settlement coalescence and avoid a sense of continuous urbanisation. The supporting text makes clear that the policy is seeking to ensure that there is a sense of leaving one settlement and passing through open countryside. It is stated that buildings, signs and other development in the countryside between settlements can prevent this from occurring. Policy 9 of the Neighbourhood Plan<sup>2</sup> (NP) supports this approach with regard to the gap between Storrington and West Chiltington.*

*15. The proposal does represent development in the gap between Storrington and West Chiltington. Whilst it would not be of a scale to represent a significant reduction in openness, as per criteria 1 of Policy 27, **the physical development and associated vehicle movements do have an urbanising effect.**”*

He goes on to say that this development “would undermine the development plan policies which seek to protect the intrinsic qualities of the undeveloped countryside, the GG and the local landscape. ...I find that the proposal would have an urbanising effect, contrary to the Local Plan. .... It would also result in development within a GG which would have an urbanising effect and cause harm to the landscape. As such it would be



*contrary to Policies 1, 3, 10, 11, 26, 27, 31, 32 and 33 of the HDPF and Policy 9 of the NP. Amongst other things, these policies seek to protect the open countryside and areas such as AW from inappropriate development. They seek to ensure that development does not take place in the GG between Storrington and West Chiltington as well as ensuring that development is sympathetic to the landscape in which it is located. The proposal would also be contrary to Paragraph 180 of the Framework...*

So, to summarise, the Inspector finds ONE PROPERTY, NOT VISIBLE FROM THE WIDER LANDSCAPE, contrary to the HDPF, the NP and the NPPF.... He supports the designation of the Green Gap.

I am at a loss to understand how you and your officers can continue to believe that 70 houses on the Melton Drive site would not be contrary to all of these same policies and why you feel you can override the Green Gap designated in the NP. Given this very recent appeal decision I see no reason to believe that an appeal on this site would not also be refused for the very same reasons – without even taking into account the 3 listed buildings.

In our meeting in September when I queried the value of the Neighbourhood Plan you stated that although we had to find further sites, the remaining policies still applied. Why, therefore, are you choosing to ignore this policy?

You state that: “the officer view (of the Melton Drive site) is that the lower level of development will... lead to a conclusion of less than substantial impacts”. Yet the NPPF, in paragraph 199, states:

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation... **This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.**”*

Again, you are failing to take account of the NPPF provision to prevent ANY harm to listed buildings.

You are again also failing to make the best use of land, stating “...the proposed allocation is for 70 homes on a site twice the size (of the previous refused application).”

Once again you are wilfully disregarding the provisions of the NPPF.

In relation to the Ravenscroft site and the Old Clayton site, you state that neither of them “would be sufficient, in isolation, to offset the number of homes proposed at Melton Drive”. No-one ever suggested that they would. My letter explicitly asked you to consider removing Melton Drive “*and replacing it with **some or all** of the sites listed above*”.

So, it seems that you are simply not prepared to consider replacing one unsuitable site with 2 or more others that are more acceptable and jointly provide an equivalent number of houses.

To conclude, we consider that you have not complied with the provisions of the NPPF in respect of the best use of land, making as much use as possible of brownfield land, a consistent approach, or “early, proportionate and effective engagement” with communities and statutory consultees. Nor have you proved satisfactorily that the plan is: “Justified – an appropriate strategy, taking into account all reasonable alternatives ...” We have presented you with reasonable alternatives which you have simply dismissed.

Had the new NPPF not been published when it was you would have tried to agree this plan without ANY consultation with parish councils and communities, as was evident from its presentation at the July meeting which was cancelled at the last minute. This PC asked to work with you to identify sites and this did not happen. Covid is not a valid excuse as on-line meetings could have been arranged but weren't. We had several on-line meetings with you about other matters.

Obviously, the recent issue of Water Neutrality will have some effect on this plan going forward and hopefully housing numbers will be reduced. However, there is also the issue of sewage being discharged into our waterways and the (as far as I can see) complete lack of any proposed infrastructure to alleviate this problem that currently exists and can only be exacerbated by further development. There is also the issue of Air Quality.

Given all of the above, we request a further consideration of the sites we have proposed and request a further meeting.

Yours sincerely

[Redacted signature]

[Redacted name]

Chairman,

[Redacted address]



# Storrington, Sullington and Washington Neighbourhood Plan

WASHINGTON  
PARISH COUNCIL

**Steering Group Meeting  
The Chanctonbury Room, Parish Hall,  
Thakeham Road, Storrington,  
6.30 pm Tuesday 19<sup>th</sup> September 2023.**

## Minutes

**Present:** Storrington & Sullington Parish Councillors – [REDACTED]

Washington Councillors – [REDACTED]

[REDACTED] (Clerk to Storrington & Sullington Parish Council)

[REDACTED] (Clerk to Washington Parish Council)

**1. Apologies for Absence.**

All Members were present and it was **NOTED** that [REDACTED] had been appointed to the Neighbourhood Plan Steering Group at the annual meeting of Washington Parish Council.

**2. To Approve and sign the Minutes of the last Meeting of the Steering Group on 8<sup>th</sup> March 2022.**

The Minutes were duly **APPROVED** as being a correct record of the proceedings of the meeting and were signed by the Chairman.

**3. Horsham District Local Plan – To Consider approach to meeting with HDC representatives about sites included in the Plan.** Members noted that the following sites were being considered in previous iterations of the Local Plan:

- Land at Melton Drive.
- Field beyond Downsvie
- Field Opposite Thakeham Tiles, Rock Road (Thakeham Parish).

It was not known at this point, whether the sites remain the latest version of the Plan but it is expected that this information will be shared at the upcoming meeting. Members expressed concerns at the lack of consultation with parishes and all Members **AGREED** that the Steering Group should take a firm stance against the methodology used by HDC Officers to assess the suitability of particular sites for development. Should HDC representatives indicate that the Local Plan will include sites that have been specifically rejected by the Steering Group it was **UNANIMOUSLY AGREED:**

*That further action be taken by way of a formal complaint about the lack of consultation on sites and the apparent inconsistency of site assessments. Social media and press releases should also be drafted and distributed amongst the Steering Group for approval.*

**4. Storrington & Sullington and Washington Neighbourhood Plan: To Consider future validity of the Plan following HDC’s decision to approve DC/23/0701 – Old Clayton Boarding kennels, Storrington Road, Washington.** Members viewed the decision to approve this application as another example of inconsistency on the part of HDC where a very similar application had been refused earlier in the year. HDC Officers had cited a gap in the SSWNP Policy that allowed for this 60 bed Care Home and 8 age restricted bungalows to be approved despite the site being assessed as inappropriate for development in the Neighbourhood Plan site assessment process and by the Appeal Inspectorate when reviewing a decision to turn down development on that site in the past. Members felt that this recent decision to allow the application has adversely impacted upon the soundness of the Neighbourhood Plan and questioned whether it would protect the community against inappropriate development in the future.

**5. Any other business.**  
[REDACTED] raised the subject of how the sites chosen for inclusion in the Local Plan in neighbouring parishes will have a cumulative impact upon the infrastructure of Storrington. Whilst this issue had been raised with HDC, there did not appear to be any acknowledgement of the strain on the road network, Air Quality and service provision that extra homes will create. It was suggested that HDC should be reminded of these concerns and consideration should be given to allocating CIL funding to improve the infrastructure in Storrington to accommodate this extra pressure.

The meeting closed at 7.30 pm

Signed: ..... Date: .....

.....  
Chairman

Notes from Meeting with HDC Cabinet Member and Officers regarding sites for inclusion in the Local Plan. 20<sup>th</sup> September 2023

Representatives from HDC, Storrington & Sullington Parish Council Thakeham Parish Council, Washington Parish Council and West Chiltonton Parish Council.

- **Introduction from John Milne (Deputy Leader and Cabinet Member for Planning and Infrastructure)**

**Acknowledged that dissatisfaction had been expressed during HALC meeting about the Local Plan not being in sync with Neighbourhood Plans (sites not matching etc.)**

In 2018 Government introduced methodology to calculate housing numbers. HDC consider that the formula is flawed and an unrealistic target has been set but they are legally bound to accept it.

In January 2023, the Local Plan was paused in the hope that Michael Gove's new approach would reduce the numbers but this hasn't happened.

HDC's numbers have been reduced due to Water Neutrality but the 5 year land supply has now been reduced to 2.5 years.

Developers are quickly coming up with "Water offsetting" measures and Water Neutrality protection is waning (despite Mr Gove's latest attempt to end it being unsuccessful).

If Water Neutrality ends, Developers will saturate HDC with planning applications which could result in 100s if not 1,000s homes in unsuitable locations due to the lack of a 5 year land supply. Hence the decision to press on with the Local Plan

Referring to lack of infrastructure to support housing, the ultimate decision to provide infrastructure such as schools, transport, medical facilities lies with outside authorities even if they are conditions of Planning so Local Planning Authority cannot control this element of the development.

- **Questions and Answers.**

Q Can we have a copy of your opening comments to share with our Communities?

A Yes

Q Can we have some guidance on how you assess Water neutrality?

A This will be covered in the training planned for November and slides will be available.

Q **When NPs were produced, we were led to believe that the Parishes would be in control of the reviews and any additional sites, why has this now been a decision for HDC?**

A **In an ideal world, this would be the case but HDC is in a difficult situation. The Local Plan will provide until 2040 but NPs only cover until 2030. We accept that consultation with Parishes has been less than we would like.**

Q How can you ensure that the sites you include will actually be delivered.

A Viable proof will be required from developers and the examination process will test the exact detail of when and how development will come forward

Q Why is this version of the Local Plan not going to re-consultation? We were told any revisions to the Neighbourhood Plans would result in a new Regulation 14 Consultation.

A The Local Plan is 90% the same and we are still in regulation 18 consultation. We have already received your feedback on the sites and these are being considered.

Q Can we review our Neighbourhood Plan now?

A This would be pointless and NPs have to comply with Local Plans and will need to be reviewed again when the Local Plan is “Made”.

Q **Have you considered the cumulative effect of housing on “Hub Parishes” that provide services and infrastructure to other neighbouring villages?**

A **Yes but it is fair to say that every part of the district is underserved with infrastructure on every level.**

Q Are you prioritising Brownfield sites?

A We can only assess sites that have been put forward.

Q What is the timetable for the Local Plan

A The Plan will be presented to Cabinet on 28<sup>th</sup> September with a view to final reg. 19 version to Full Council in December. Reg. 19 Consultation in January 2024, Submit for Examination in June 2024 with a result by Autumn 2024 (all estimates).

The meeting then split into individual NP areas to look at sites submitted. (see draft letter in response).



# Storrington, Sullington and Washington Neighbourhood Plan

WASHINGTON  
PARISH COUNCIL

John Milne  
Deputy Leader & Cabinet Member for Planning and Infrastructure  
and  
Barbara Childs  
Director of Place

By Email.  
27<sup>th</sup> September 2023

Dear John and Barbara

**Re: Horsham District Local Plan**

Following the meeting on 20 September 2023, regarding potential sites to be included in the Local Plan, we thought it appropriate to place on record what was said.

HDC Officers presented us with a number of sites ‘for consideration’, stating that nothing had yet been decided, yet in the course of the more detailed discussions it became apparent that this is not the case. We were told that certain sites (in particular SA639 (off Fryern Park) and SA486 (Clay Lane) were ‘not supported’ and ‘not being taken forward’. This begs the question, on what grounds are these sites not supported yet others are being taken forward? We kindly request clarification and further discussion.

We reminded you that SA361 and SA73 (Melton Drive) are not supported locally, were rejected under the NP process, are in the protected Green Gap in the NP and very close to 3 listed buildings – one a Grade II\*. This site has previously been refused twice by HDC and once at appeal as being outside the BUAB, in the Green Gap, detrimental to the countryside and in an unsustainable location. None of this has changed. SSPC will not support this site and we understand that West Chiltington PC would not support it either as it is in the Green Gap between our villages. Nor is it supported by our district councillors or Phillip Circus, Councillor for West Chiltington.

As we pointed out, at least 3 applications for one property each have been refused at appeal very nearby – the latest on 12 September 2023 – because they are outside the BUAB, in the Green Gap, detrimental to the countryside and in an unsustainable location. We simply do not understand the logic of continuing to promote this site and will continue to oppose it.

It is possible that some of the other sites put forward could be acceptable, but that would have to be discussed further.

We again questioned why Bell Acre is not included. This site is in the village centre and currently under an option with a developer. As you know this site is jointly owned by HDC and SSPC and being sold for residential development. However, you continue to state that it is not suitable due to an incorrect flood risk assessment. We have today sent a letter from the EA stating they would not object to Mark Maclaughlin. If, as he stated, you have a letter

stating the opposite we suggest that a new assessment should be done. It seems somewhat bizarre, if not unethical, for us to be selling land for development when, according to Norman Kwan, permission would not be granted because of the said flood risk...

Looking at the sites in Washington, the highly contentious Longbury Hill Woods, together with two directly adjoining sites in Heath Common, should be resisted at all costs. We understand it is on the list because the landowner has proposed it in a "call for sites". However, it generated significant public outcry when previously proposed, including a petition organised by MP Andrew Griffith, which he handed to Clarion Homes. This land was specifically rejected in the NP, and in the last SHEELAGH report, it was rated in the least suitable category for development. An alternative site, the long-abandoned brownfield Luckings Yard, was always supported by us in principle, but is not on the list. We noted that Norman Kwan would investigate/ review.

Other sites included in the NP that have not been considered – e.g. the sorting office site, currently up for sale, and Chantry Lane Industrial Estate – are all brownfield sites supported by the parishes. We request that this also be reviewed.

The land at Kithurst Lane appears in the list but is not supported locally nor included in the NP. It was not even put forward.

You gave us the timetable for the next stages of the plan , stating that it will go to Cabinet on 28 September then to Council in December with the Regulation 19 consultation around January 2024.

**We are now extremely concerned that this may become a "fait accompli" without any further consultation with the parishes/ NP. It was always a given that any future changes affecting the NP should be implemented with full consultation, and the support of the plan's steering group and parishes.**

**We have already seen one example, a 60-bed care home at Old Clayton Kennels, given recent approval despite having been rejected as a site for development in the NP, and in previous applications and appeals spanning 13 years. The case officers at HDC expressly promoted this site, in the full knowledge that it breached the spirit and intentions of the NP, using a legal technicality to justify support.**

**This, together with the lack of consultation hitherto on all other matters, has placed significant strain on the parishes' relationship with, and confidence of the District Council. The NP was 6 years in the making, and deserves better support.**

Signed on behalf of Storrington, Sullington & Washington Neighbourhood Plan Steering Group.

Chairman

Vice Chairman



# STORRINGTON & SULLINGTON PARISH COUNCIL

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## CHAIRMAN'S PAPER

Barbara Childs  
Director of Place  
Horsham District Council

5<sup>th</sup> December 2023

By email

Dear Barbara

To say that I am disappointed with the recently published local plan would be a considerable understatement.

There has been no meaningful consultation with parish councils over proposed sites and, certainly as far as Storrington & Sullington is concerned, our strong objections over several years have simply been ignored. The "consultation" has been a tick box exercise and I do not believe you have complied with the regulations in this respect. Nor do I believe that the plan complies with the NPPF. The Neighbourhood Plan has been completely disregarded as you now propose putting a considerable number of houses in the only green gap included in the plan.

Under no circumstances can this be considered as a "bottom up plan". This is a plan imposed by Horsham District Council. The 622 comments received from the Regulation 18 consultation, the vast majority of which were objections, have been ignored.

After 32 years on the Parish Council, thirteen of them as Chairman, I feel that I am wasting my – unpaid – time trying to have any meaningful discussions with the District Council.

As a result, I am tendering my resignation, and I will now lodge my objections as a well - informed member of the public.

**Yours faithfully**

[Redacted signature]

**Chairman, Storrington & Sullington Parish Council**