

Joanna Jones - HDC Local Plan Main Modifications Matter 6f (HA18 / STO3) examination hearing statement

This statement is structured around the Matter 6f agenda. It also includes visual evidence to support the points made.

Transport and Movement: STO3 (SA 732) Highway Access

Key site characteristics (see Figure 1):

- 2 fields surrounded by trees with bluebell woodland and a footpath between them. Historically, the fields have been part of East Wantley Farm for 300 – 600 + years. East Wantley is adjacent to STO3 to the north - the hamlet contains two Grade II listed buildings. West Wantley House to the north-west is Grade II*. The surrounding area is an intrinsically dark landscape – stars on Figure 1 show the lights that can be seen from East Wantley – two on the southern boundary of STO3 and one to the east..
- There is a significant 12.5% downslope from the STO3 southern boundary towards East Wantley. The southern boundary is a ridge with Melton Drive behind the ridge.
- The only current access is via farm gates to the north of the site – shown in blue.
- All field boundaries contain mature trees/ hedgerow and woodland. Significant areas of scrub are also present around the western, northern (W), eastern and around the woodland between the two fields. These habitats and protected species around that site - they are all prioritised for protection in the West Sussex Nature Recovery Strategy.
- A footpath also runs east-west to the north of the site

STO3 has no legal/ 'sound' access (required at the plan-making stage – see NPPF Sept 2023 para 104) because of the following restrictions:

- **Western boundary:** The HRA for DC/24/2006 highlights the presence of Barbastelle bats near West Wantley which are functionally linked to those present in The Mens SAC. Barbastelle bats are amongst the rarest in the UK and are highly light sensitive.
 - The CHSR 2017 Appropriate Assessment DC23/2006/ STO1/ Land North of Melton Drive states: *It is our understanding that no trees have been removed as part of this development and there will be no severance to the flight lines of foraging or commuting [of Barbastelle bats].*
 - An access road from STO1 into STO3 would breach this condition.
- **Southern (W) boundary:** Houses on Melton Drive currently preclude any direct access from Storrington to the south. There is also a substantial belt of mature trees adjacent to these houses- extending the foraging route.

- **Bluebell woodland between the two fields:** Ecological surveys and historic mapping highlight:
 - There is very strong evidence that it is ancient woodland (27 indicator species present) and has 1 veteran and other notable trees. It is also shown on a 1707 Estate map. Natural England highlight it should be treated as such – see Annex C of my Main Mods representation..
 - Protected species, hazel dormice and bats, are recorded as being present.
 - An access road through the woodland to access the eastern field would harm this irreplaceable habitat and the protected species and footpath within it.
- **Southern (E) boundary:** The HRA for Land North of Downsview Avenue/ DC/23/0290 states:
 - *"No loss of edge habitat with the tree lines and hedgerows on the north, east and western boundary being maintained in situ and protected during site works"* and *"the northern hedgerow will be enhanced with new planting proposed"*.
 - An access road into the STO3 eastern field would require access through the northern boundary of DC/23/0390, breaching this condition.
- **Eastern boundary:** Water Lane Trading Estate and mature trees within the site.
- **Northern boundary:** East Wantley with single-track Northlands Lane running to the north - unsuitable for development or construction traffic providing access. It also forms part of the dark Barbastelle foraging routes.

Transport and Movement: Cumulative highway impact and the effect on the Air Quality Management Area

Background

Storrington suffers from considerable morning and evening peak-time congestion, leading to unacceptable Air Quality. The village centre contains Horsham District's only Air Quality Management Area (AQMA). The Traffic Assessment 2040 highlights that key junctions within Storrington and the A24 Washington roundabout operating over 100% capacity at peak-times. They are the top three in the District's junction peak-time capacity 'league tables'. No effective mitigations are presented.

HA18 would add 247 dwellings in Storrington, alongside other development in the surrounding area which will add to traffic in the AQMA. The revised Infrastructure Development Plan highlights that no significant improvements are planned to improve Storrington's travel infrastructure (roads, public transport, active travel are planned to meet the cumulative additional demands of HA18, neighbouring allocations and other ongoing developments.

AQMA impact – the plan-making approach does not comply with NPPF paragraph 186.

NPPF paragraph 186 requires the presence of an AQMA and the cumulative impacts from individual sites in local areas to be taken into account, **with opportunities to improve air quality or mitigate impacts considered at the plan-making stage**. It also highlights that a strategic approach is required to *“limit the need for issues to be reconsidered when determining individual applications”*.

For the preferred sites, each Site Assessment classifies them as having ‘potential for mitigation’ for their adverse impact on Air Quality. However, improvements / mitigation(s) are not specified and their impact is not demonstrated, or shown to be affordable and deliverable. In addition, a strategic assessment of the cumulative impact of all developments in the area does not appear to have been undertaken at the plan-making stage as required by NPPF paragraph 186. Instead HA18 ‘preferred’ sites are individually required to provide an Air Quality Impact Assessment and Emissions Mitigation Assessment at the planning application stage, which directly contradicts the required approach.

In addition, preferred Storrington sites STO1–STO5 have been treated differently from 7 rejected sites. For the rejected sites, the AQMA impact was the principal reason for rejection, with no AQMA mitigation deemed possible. The rejected and preferred sites should be assessed consistently, with clear evidence demonstrating why mitigation is capable of addressing the cumulative impact of the preferred sites and other nearby developments, but not possible for the rejected sites.

The approach taken to HA18 by the Council to address the impact on the Storrington AQMA at the plan-making stage is unsound.

Transport and movement: STO3 Bus, cycling and pedestrian facilities and access to the village centre

STO3 lies around 1km to the north of Storrington village centre, down Downsview Avenue - a significant hill. The GP surgery and Recreation Centre are further away, unless unsafe (no pathway on a narrow section of Fryern Road) and unlit footpaths are used.. Many of these facilities are beyond CIHT recommended walking distances. There is an hourly bus service to Worthing with bus stops on Fryern Road and in the village centre. There are no dedicated active travel routes.

Cars will likely be the dominant form of travel to and from STO3, adding to existing Air Quality and congestion issues. *It is non-compliant with the Climate Change HDLP policies introduced at the Main Modifications stage.*

Availability and sufficiency of social and community facilities: healthcare, education and other facilities

The revised Infrastructure Development Plan highlights that no new employment sites, and no planned expansion of education facilities and primary healthcare are to meet the additional demands of HA18 and other sites in neighbouring areas. The proposed closure of the Steyning Grammar School satellite site in Storrington has an adverse impact. **It is not a sustainable location for significant cumulative development. HA18 non-compliance is considered with NPPF paragraphs 11(a), 79 and 105.**

Availability and sufficiency of social and community facilities: open space and recreation facilities

Storrington and Thakeham have recreation centres and village halls. Both recreation centres are over a mile walking distance from STO3. Cars are the most likely form of transport to them.

The Public Right of Way network north of Storrington is well-used by residents as a means of recreation. ***The enjoyment of this network will be harmed by STO3 contrary to NPPF paragraph 100.*** This is discussed in more detail later sections.

Impacts and mitigation: Heritage, protected wildlife and habitats

Key characteristics:

- STO3 is adjacent to 2 listed buildings, East Wantley Farm and Barn, with West Wantley House to the north-west.
- Historically, East and West Wantley were isolated farmsteads lying in a valley between Storrington (hidden by the ridge to the south) and West Chiltington / Thakeham to the north/ north-east. Mapping evidence shows that the STO3 fields have been an integral part of the farm for at least 300 years.
- East Wantley sits on the parish boundary with Thakeham. The boundary runs along the northern edge of STO3's eastern field.
- It is an intrinsically dark landscape – only 4 lights visible around the landscape (see Figure 2 and 3).
- The boundary between East Wantley's heritage assets and STO3 is a deciduous woodland strip, which provides little screening after leaf-fall for 6 months of the year.
- As highlighted in the access section, both STO3 fields are surrounded by wooded hedgerows and mature trees, with a bluebell wood (considered to be Ancient), which encloses a footpath, lying between them.
- Hazel dormice are recorded in the central woodland and western boundary. Bats are recorded around the site with a colony of Barbastelle bats nearby. These are one of the rarest bat species in the UK and are red-listed as 'vulnerable'. The colony is functionally linked to The Mens Special Area of Conservation. As highlighted in the access section, this typically requires maintenance of dark (zero lux) foraging routes and preservation of linear features like hedgerows and field margins.

It will cause significant harm to the setting of East Wantley's heritage assets, protected wildlife and harm the enjoyment of footpath users:

- The Council proposes that the development would be to the north of the western field, to minimise the impact on the setting. However, this field has an average 12.5% slope, making it very difficult to screen the development from the listed buildings to the north in accordance with Heritage England guidance. The rural setting would become a suburban one with significant noise and light impacts, causing significant harm to the setting, both for residents, users of the adjacent footpaths and the Barbastelle bats. It also creates wider landscape issues - see the following section..
- The Council's assessments do not mention the Eastern field. Development to within 50m of East Wantley is likely. Compliance with HRA requirements including, maintenance of a 12m buffer to woodland, also pose a significant design constraints.

Alternative sites are now available. Alternative sites have now been brought forward within Storrington with no similar heritage and environmental impacts. They have been rejected on the grounds that Air Quality cannot be mitigated. All sites, 'preferred' and 'rejected' should have been assessed consistently in accordance with NPPF paragraph 186. NPPF paragraph 200 states that: *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.* No such justification for STO3 being a 'preferred' site has been provided, given that alternative sites with similar air pollution impact are now available in the area, but have less environmental and heritage impact.

Conclusion The relationship of the two fields to the historic settlement, together with the site's topography, and presence of protected species means that the potential effects cannot be addressed simply by relying on landscaping or separation. Alternative sites creating less harm are now available, had both 'preferred' and 'rejected' sites been considered consistently. ***STO3 is considered unsound – it does not comply with NPPF paragraphs 100, 194, 199, 200 and 202.***

Impacts and mitigation: Harm to the wider landscape, including the setting of South Downs National Park

Storrington is largely contained in a valley running east-west. STO3 develops beyond the northern ridge of this valley. It will be visible from a public right of way over 1 – 1.5km to the north against the backdrop of the South Downs National Park. Development would introduce built development into a currently undeveloped foreground and make the built form of Storrington substantially more apparent from the north and from the Public Rights of Way Network that run through and around the site (see Figure 4).

Figures 5-8 show evidence from the ridge footpath (SAS-2791), approximately 1 km to the north, demonstrating the existing landscape relationship of STO3 with the rural foreground and SDNP in the background.

Figure 7 shows that the Land North of Downsview Avenue development has already had some impact on these views. The HRA requirement to enhance its northern boundary may provide some mitigation over time.

However, Figure 8 illustrates that STO3 would make a substantially broader impression on the landscape, extending built form into a currently undeveloped part of the foreground and further diminishing the sense of separation between Storrington and the northern ridge of this valley which runs close to the West Chiltington Parish Boundary.

Figure 9 shows the elevation profile from the existing Storrington built-up area boundary (Figure 1 point A on the southern boundary of STO3), the photo viewpoint on ridge footpath to the north and the West Chiltington parish / built-up area boundary (Figure 1 point B). It serves to confirm that the sightlines are extensive – not "limited" as stated in the Main Modifications Habitat Regulations Assessment.

STO3's slope makes tree screening / landscaping to mitigate the wider landscape impact near impossible,

STO3 is also contrary to the Regulation 19 combined assessment (for what is now STO1 and STO3) which recognised that landscape sensitivity was high and that visual intrusion into the wider countryside should be kept to a minimum.

Conclusion: STO3 will cause significant landscape harm, including development into a highly visible section of the valley to the north of Storrington which significantly increases the visual footprint of Storrington. *STO3 is considered unsound – it does not comply with NPPF paragraphs 100, 174(a)–(b) and 176.*

Impacts and mitigation: Drainage and Flood Risk

East Wantley Farm and Old Mill Cottage are in Flood Zone 3, immediately below STO3. Appropriate assessment and protection measures are required to ensure STO3 does not increase the flood risk.

Adequacy and accuracy of the STO3 Evidence Base

NPPF paragraph 31 requires: *“preparation and review of all policies to be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate.”*

The Council’s approach to provision of adequate (accurate) and up-to-date evidence for STO3 is unsound:

- Plan documents have repeated misidentified STO3/ SA732 across all plan stages and across multiple documents – primarily using the characteristics of STO1 to apply to STO3. Inaccurate / missing / misleading information about the site’s location, the woodland and footpath separating the two fields, the number of fields, the slope, and the visibility of the site have a material impact when assessing the soundness of the site. These errors have been repeatedly highlighted in responses to the Council, but the documents have not been updated to correct them. It appears that they have not been given ‘conscientious consideration’ as required by the Gunning Principles.
- Information about STO3 access issues (e.g. HRA conditions for adjoining sites) has been known to the Council for at least 2 years, but are not addressed in the Council’s Main Modifications evidence base.

Figure 1: STO3 Characteristics



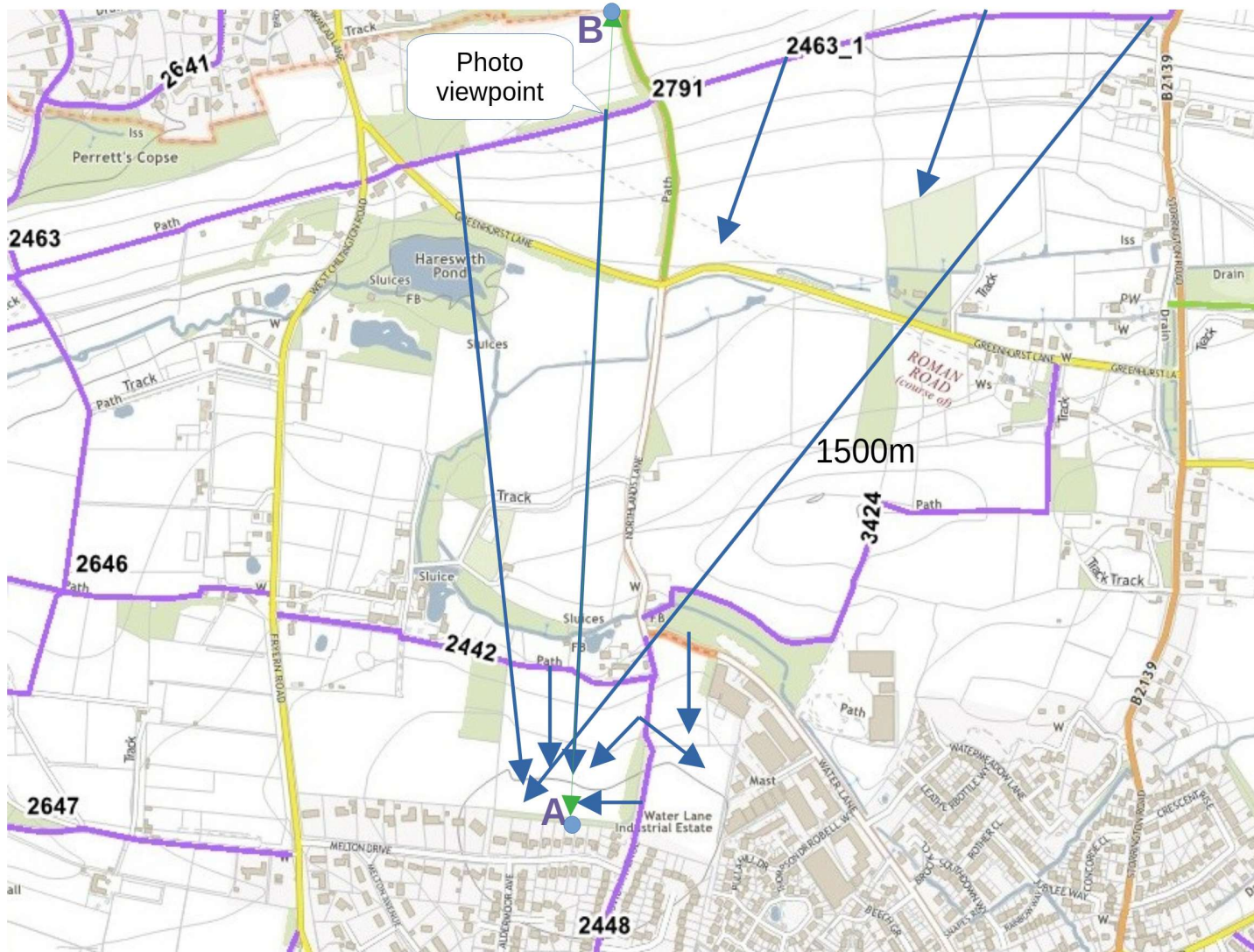
Figure 2: Intrinsically dark landscape – Current winter night-time view (1 light extreme left and Orion to the north)



Figure 3: Winter daytime view looking south from East Wantley



Figure 4 – STO3 viewpoints from public rights of way



Figures 5 and 6 – Winter view of STO3 from the ridge footpath against the backdrop of South Downs National Park



Figure 7 - 2016 Summer view showing the Land North of Downsview development against SDNP backdrop



Figure 8 – STO3 sketched impression added



Figure 9 – Elevation Profile from the existing Built-up Area Boundary to the West Chilmington parish / built-up area boundary (Points A to B in Figure 1)

