1.1. This Position Statement (produced on behalf of MiBri Ltd. in support of the Angell Sandpit allocation) addresses pertinent questions raised by the Examiner, re-provides previously submitted evidence and includes new details to demonstrate the suitability of the site for residential development.

1.2. Representations in Appendix A & B essentially provides a response to Question 1 - meeting housing needs. Clearly all allocations, irrespective of yield, are essential to ensure housing delivery is maximised. The Angell Sandpit site, whilst small, would provide an essential contribution of around 10% of the total yield of allocations (when discounting the virtually completed Paula Rosa / unavailable Post Office sites).

1.3. Question 6 queries the site's appropriateness for residential development. We consider the site is sustainably located (refer to Appendix A / B) with good access to facilities, sustainable transport options and employment opportunities on the edge of a Tier II settlement as identified within the Horsham District Planning Framework settlement hierarchy. It is bordered by the built-up edge of Storrington on its entire southern and western boundaries. It meets all of the criteria for boundary modification of the Neighbourhood Plan (refer to paragraph 4.15).

1.4. In terms of character and landscape Appendix A - C illustrate how a sensitively designed scheme could comfortably sit within the landscape and setting (being surrounded on three sides by low density development). The proposal would not be visible from the SSSI to the north by virtue of the topography of the SSSI with only slight glimpses from Water Lane / footpath along the western boundary again by virtue of topography but also existing screening vegetation. Any proposal would supplement the existing established screening to reduce impact. Appendix A / B considers impact of development on views from the South Downs National Park which would be unobtrusive if not imperceptible. A low density development would be entirely compatible with the character of the surrounding area in design terms with limited landscape impact.

1.5. Question 6 queries the buffer zone to the SSSI. Our response (refer to Appendix B) initially promoted a 20m buffer, however having undertaken further work it is our view that a 15m buffer is sufficient. It is unclear how Natural England has arrived at a figure of 20m which seems arbitrary and we have seen no justification as to why 20m is required. A 15m buffer (as well as a sensitive design) would be more than sufficient to provide habitat creation and protect the SSSI from cat predation, dust impact and light pollution. Drainage will ensure runoff to current greenfield rates and flood work has been carried out which confirms this.

1.6. Access can be achieved via Heather Way – please refer to Appendices D – G for pre application discussions with WSCC, land ownership details and agreement with land owners for access arrangements. Clearly an accessible access is possible.

1.7. Development at Angell Sandpit would have no physical impact to the Listed Building (Chestnut Cottage) or its grounds. A recent conjoined appeal for two further residential properties within the grounds of Chestnut Cottage (Appendix H) demonstrates that it is the openness of the grounds which is significant in setting terms (refer to Appendix A / B). The allocation includes a large buffer to the listed building and provision of single storey properties on the eastern boundary. In addition to considerable boundary screen planting a sensitively designed scheme would cause no harm to the openness of the grounds of Chestnut Cottage or indeed its setting whilst also enhancing the verdant character of the area. Any proposal must also be considered against the changing nature of the listed building / surroundings. The original school (the use of which has long ceased) has been subdivided (School Cottage to the south is in a poor state - Appendix I) and significantly extended / altered including poor quality rear roof extensions and a very large rear conservatory. The site itself was a working sandpit, only recently restored, and with the recent development of Angell Sands to the south and the conversion of the garage within the grounds of Chestnut Cottage to form one independent dwelling (The Lodge), any argument about complete rural isolation is gone.

1.8. The site may have contamination (refer to Appendix J) which may necessitate some mitigation measures. Contamination can however be dealt with through appropriate mitigation measures as per the approach taken at the Angel Sands site to the south. Mitigation measures are noted in Part 4 of Appendix J. With regards to drainage, borehole soakaways would utilise a sleeved bore down to the natural sandstone at the base of the former quarry thus avoiding migration of contaminants.

1.9. The Built-Up Area Boundary should be extended to link with Water Lane, which in addition to Washington Road and the SSSI to the north would represent defensible and logical boundaries.
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Appendix B – Strategic Housing & Economic Land Availability Assessment Representation – July 2018

Appendix C – Indicative Site Sections

Appendix D – Pre Application Response West Sussex County Council – Email Exchange

Appendix E – Land Registry Plans and Accompanying Letters Regarding Access

Appendix F – Access Plan (7053/100 Rev B.)

Appendix G – Tracking Plan (7053/101 Rev A)

Appendix H – Appeal Ref: APP/Z3825/D/17/3169769 and Ref: APP/Z3825/W/17/3171901

Appendix I – School Cottage Images

Appendix J – Desk Study Report for the land at Angell Sandpit (05/12/2017)
Appendix A - Representations to the Storrington, Sullington and Washington (SSW) Neighbourhood Plan
02 October 2017
Dear Ms. Childs,

RE: Representations to the Storrington, Sullington and Washington (SSW) Neighbourhood Plan

We write to you on behalf of our clients (and owners of the site) MiBri Ltd following our attendance at the Storrington Sullington and Washington Neighbourhood Plan Steering Group meeting last week (26.09.17).

It is our understanding that the consultation responses for the Neighbourhood Plan have been received and analysed. We hold some concern that the negative responses have been disproportionately represented by the Steering Group. It is our understanding that there were a significant number of consultees that supported the site’s inclusion and this should be formally recorded and that the majority of respondents were accepting of site inclusion.

We also understand that many of the concerns were raised with regards to more general highways issues. The proposal will address suitable access and furthermore could secure improvements to the existing access point on Heather Way. We seek to address concerns, as well as other matters raised at the meeting, within this letter.

Housing Need

As expressed previously, we have concerns that the proposed Neighbourhood Plan fails to a) identify the housing need for the Forum area and b) seek to meet this need.

It essential that the Neighbourhood Plan is seen to be positively seeking to address housing needs within the local area.
In our view, the Neighbourhood Plan is allocating in totality around 100 new units when the housing need for the area over the plan period is likely to be in excess of 682 – 992 new homes as discussed below.

The allocation of the Angell Sandpit site is therefore critical in aiding to meet the pressing housing need facing the Neighbourhood Plan area.

The Neighbourhood Plan Forum does not appear to have assessed housing need and we were unable to obtain Housing Study published by Storrington Parish Council.

The recently published Ashington Parish Council Housing Needs Assessment Final Report July 2017 provides a useful local comparison. This study noted an Objectively Assessed Need of around 200 homes for the Parish. On the basis that Ashington is an existing settlement of 922 households, 200 units represents a 21.7% increase on existing levels.

Applying this rate of increase to the SSW Forum area would provide an objectively assessed housing need figure of **682 new dwellings** (on the basis that there are 3,147 households located within the Forum area (as stated within the Draft Neighbourhood Plan) – applying a 21.7% increase to 3,147 = 682).

In our previous representations, we argued that the objectively assessed housing need was approximately **992 dwellings** (please refer to our representations dated March 2015).

We note that the recent DCLG consultation on the methodology for calculating Objectively Assessed Need significantly increases the need required within Horsham District. As a sustainable location within the district, Storrington will be required to assist in meeting this need and it is likely that any housing need assessment will take an upward trajectory as a result.

As currently drafted the SSW Neighbourhood Plan allocates around 200 new houses as follows:

<table>
<thead>
<tr>
<th>Land at Robwell Way (Paula Rosa):</th>
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<td>The Vineyard’s:</td>
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<td>6</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>191</strong></td>
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Two reserve sites at Old Mill Drive is identified for 20 units and the Post Office Depot is reserved for 10 units bringing the potential total to 221.
However, the inclusion of two of the above sites is questionable. Firstly, the Paula Rosa site has planning permission (and is currently being built out). The application was determined in relation to the Horsham District Planning Framework and should therefore be treated as a windfall site. The inclusion of part I of Policy 2 is therefore questioned. We would strongly argue that the housing figures could not be included within the Neighbourhood Plan and should be removed from the overall housing numbers.

Furthermore, the Post Office Depot site is not available as set out within the Forum’s site assessment report. Unless the Forum has evidence to suggest that this site is likely to come forward over the plan period (ie that the owner has confirmed this) then the site should be removed since it is unachievable.

On this basis, the SSW Neighbourhood Plan Forum would allocate around 100 dwellings with a reserve site for an extra 20 units. In our view this is an inadequate level of housing to be allocating within the Neighbourhood Plan when a very conservative estimation of the objectively assessed housing need figure is likely to be somewhere in the region of 682 – 992 dwellings (not including any potential increase in housing need resulting from the recent DCLG proposed changes to OAN methodology).

On this basis, the inclusion of the Angell Sandpit site is essential as set out previously.

We would once again reiterate that the site is developable and deliverable and, in our view, suitable for residential development and we would wish to once again provide assurance on the areas of concern raised last night as follows.

**Access and Highways**

We have previously provided information regarding access onto Heather Way (as set out within our letter dated 14th March). We can confirm that our client can satisfactorily and safely achieve access via Heather Way. Further detailed work would accompany any future application, however, as set out in our previous correspondence, the following assessment made by WSP Group Transport Consultants is considered sufficient.

> *Heather Way lies within the 30mph speed limit at the edge of Storrington, forming part of the public right of way network (footpath). It appears to go on to serve Heather Lane via other access point(s) to the east. Based on the speed limit, visibility splays at this junction should be in excess of 2.4 x 45m in each direction. To the west (right) visibility is in excess of this; to the east (left) it appears that some trimming of vegetation may be necessary to achieve this.*
Heather Lane lies within the 40mph (buffer) speed limit to the east of Storrington including areas up to and including the Water Lane junction. Based on the speed limit, visibility splays at this junction should be in excess of 2.4 x 59m in each direction. At an ‘X’-distance (drivers position of 2m, to the west (right) visibility appears to exceed the ‘y’ distance; to the east (left) it appears that some trimming of vegetation will be necessary to achieve this.

As the access points serve existing dwellings it is in the interests of all properties currently serving Heather Way to improve visibility with enhanced maintenance.

In the event that adjacent property owners seek to obstruct or prevent the potential improvement of visibility it may be possible for the Highway Authority to advance a S79 application (Highways Act 1980) to address this matter.

Maintaining the visibility at this junction serves an important highway function thus it might be reasonable for the development to enter into a S142 Licence (Highways Act 1980) to maintain the trimming of the vegetation and thus preserve and enhance visibility at the junction.

I believe there are in excess of 20 dwellings served by these two access points. As a conflict point on the A283 already exists, increases in traffic on the minor arm will have a small effect on accident potential, however any contribution which preserves or enhances the safety of this junction should make a positive contribution to road safety.

Safe access is therefore clearly achievable from Heather Way. In addition, there is a demonstrable benefit in terms of potentially improving the safety of the residents living at the existing properties of Heather Way and using the existing access points. Furthermore, improvement work can also be secured to Heather Way as part of the proposed development.

Sullington Warren SSSI

We have previously provided information regarding the impact on the SSSI as set out within our letter dated 14th March and as follows:

The Angell Sandpit site to the south of the SSSI lies within Natural England’s SSSI Impact Risk Zones. These zones are used to trigger planning application consultations with Natural England. Subsequently, Natural England would be required to be consulted on any planning application or Development Plan Document (such as the SSW Neighbourhood Plan).

Due to the proximity of the site to the environmental designation, a SSSI Impact Assessment would be required to demonstrate that there are no adverse effects of the development on the environmental designation.
This Impact Assessment will be produced in due course. In the interim, the Ecology Partnership (Ecology Consultancy) has considered the site in relation to the SSSI and provides the following advice prior to the production of the Impact Assessment:

With regards to the pit site, which lies immediately adjacent (south) of Sullington Warren. You are aware that the site abuts a SSSI and as such an impact assessment would need to be completed as part of any application. This impact assessment would cover impacts with regards to habitats and species within the site, i.e. the development boundary, but also address impacts on habitats and species of importance outside the red line boundary. In essence direct impacts and indirect impacts would need to be discussed.

With regards to the site in question. Having reviewed the site, the layout and the design, I can see that there would be no direct impacts on the SSSI. There would be no land loss, land take, habitat fragmentation or habitat isolation resulting from the proposed development on the SSSI. In essence none of the SSSI is to be lost nor will the development result in the SSSI becoming more exposed or isolated in such a way as to make the SSSI less stable in terms of its long term viability.

With regards to indirect impacts, we do have to consider the implications that development has on offsite habitats and look to reduce these to negligible impacts, if this is indeed possible. With regards to this site specifically, the proposals are of modest proportions, with only 6 units proposed within the site boundaries. This reflects on current housing densities around the site. The building of 6 houses alone would not be considered significant. We would have to look at in combination projects, however, I am currently unaware of any applications for large scale developments within the immediate area.

In terms of indirect impacts the following have to be considered; light levels with regards to bats foraging within our site and within the SSSI; increase predation of birds and other species within the SSSI due to increase in residential dwellings around the SSSI by cats; drainage; dust during construction.

The 20m buffer along the northern edge would certainly be significant in terms of reducing/minimising any impact with regards to light levels altering as well as cat predation. The buffer can be enhanced, certainly around the very edges with more thorny species to further reduce any cat incursion into the SSSI. If gorse is present, then this would certainly reduce this. I would suggest that the 20m buffer is kept outside the ownership of the 6 new dwellings and maintained and enhanced as its own entity and linked to the management expectations of the SSSI. As such, there would be no loss of this buffer and therefore the cat issue and lighting issue would not be altered in the long term. Ie. no room for loss of buffer from home owners. I would also suggest no lighting if possible, or low level bollard lighting within the road. Lighting can be conditioned, but by thinking about this up front and developing a lightning plan in the master plan this issue can certainly be removed.
With regards to drainage, I would assume your drainage consultant will ensure that run off is to current green field levels and as such would not impact or alter on the water levels that are currently flowing into the SSSI (if they do at all.). This would be included in our impact report.

Finally with regards to dust/pollution etc during construction. We would recommend a range of measures to ensure that pollution and dust levels are kept to a minimal. This may mean screens established along the 20m buffer, damping down a construction environmental management plan. However, this would only be a short term disturbance and would be minimal, once mitigation is in place, and would not be considered significant.

As such, I believe no direct impacts. Indirect impacts will be mitigated for by the buffer. The buffer does have to be well managed and this must be secured in some financial agreement. If this is in place then I believe impacts would be negligible.

Heritage

The SSW Neighbourhood Plan Forum has previously raised concerns regarding the impact of the proposed development upon the setting of the listed building on Water Lane (Chestnut Cottage). The applicant has been working closely with both the Neighbourhood Plan Forum and Horsham District Council to allay concerns and a significant amount of correspondence has been submitted in this regard.

The recent conjoined Appeal decision for Chestnut Cottage, Water Lane, Storrington (APP/Z3825/D/17/3169769 and APP/Z3825/W/17/3171901) in our view would assist in clarifying the impact on heritage asset. The Appeals were for a replacement dwelling and new dwelling alongside improved access and carport related development within the grounds of the listed building on Water Lane.

The Inspector, in dismissing the Appeal, stated:

The setting of the cottage, as a listed building, is characterised by the openness of its garden grounds.

…it is the openness of the cottage’s grounds that is of significance to this listed building’s setting.

In our view it is clear that the significance of the listed building’s setting relates to the curtilage of the building rather than the wider setting.

This clarity on the setting of the listed building confirms the approach advocated by the proponents of the site, reflected within the proposed policy for the Angell site. The proposed development, to be located some significant distance away (45m) from the listed buildings, would have no discernible effect on the openness of the garden grounds of the listed building and would therefore cause no harm to the setting of the listed building.
The Inspector’s report also notes:

…the overall harm to the listed building would be less that substantial…

Subsequently, the test for such a proposal as set out within the NPPF would be whether the scheme had any benefits which would weigh in the favour of the development.

Subsequently, through ensuring a buffer of some 45m, with the closest property being single storey, the proposed Angell Sandpit Policy within the Neighbourhood Plan provides significant protection to the wider setting of the listed building and as confirmed above. The proponents of the site are supportive of this approach.

Moreover, the site is circa 1 hectare in size and development of six dwellings would be of a density commensurate with the surrounding rural character taking into consideration the proposed buffer zones to both the SSSI and the heritage asset. Dwellings could be single storey further reducing impact.

Subsequently, in our view there would be no impact on the significance of the heritage assets. However, should it be considered that there was an impact, in our view this would be low on the less than substantial spectrum with regards to paragraphs 132 to 134 of the National Planning Policy Framework. In this respect the scheme would need to be considered with regards to the public benefits of housing provision which as stated previously would weigh heavily in the planning balance.

The Appeal decision notes the verdant appearance of Water Lane. The allocation of Angell Sandpit would not impact on this character by virtue of the significant separation distance between the site and the listed buildings. However, in our view there would be an opportunity to enhance this verdant character through a thoughtful landscaping approach on the site (and as reflected in the policy as drafted).

The proposed buffer zone and sensitive design / landscaping in combination with the low density of any future development would, in our view, ensure that there would be no harm to the significance of the listed building’s setting as a result of site allocation.

Views from the South Downs

As set out in previous submissions (please refer to our letter dated 15th March 2017) we do not consider there significant concerns regarding impact from a landscape point of view.

By virtue of the low proposed density of the site and careful consideration to landscaping and massing at the design stage, it is our view that there would be very limited impact on views from the South Downs.
The site is barely perceptible in long range views and it does not represent a prominent or special feature in the landscape when viewed from the South Downs. It is a vacant site which, in such views, is perceived within the context of low density semi rural development and is screened by virtue of the new houses to the south of it. The site is not densely wooded within the central area (proposed for development) which is sparsely vegetated with denser vegetation towards the boundaries.

Subsequently, development would seek to ensure the verdant nature of the semi rural character of the area is maintained and enhanced. The site is not located within the National Park, yet the development of it would by no means negatively impact on the enjoyment of visitors to the National Park or indeed of views northwards from within it. A future planning application would fully demonstrate the careful design and landscaping approach to ensure limited impact in this respect.

Summary

In conclusion, we welcome the allocation of the Angell Sandpit site within the draft Neighbourhood Plan however we are seeking to address some concerns raised in the discussions at the most recent Steering Group meeting. We have therefore sought to reiterate that the proposed development of the site would have no (or very limited) impacts as set out within this letter and that furthermore we strongly urge the Neighbourhood Plan Forum to continue to support the site for allocation within the Neighbourhood Plan in accordance with Policy 2: Site Allocations with respect to part V– Land at Angell Sandpit.

We wish to work proactively and positively with both the Neighbourhood Plan Forum and Horsham District Council on the allocation of this site as making an important contribution towards housing needs in the area.

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

Chris Barker MATP MRTPI
Managing Director
Appendix B – Strategic Housing & Economic Land Availability Assessment Representation – July 2018
Strategic Housing & Economic Land Availability Assessment Representation

Angell Sandpit, Storrington

July 2018
Project Name: SHELAA Representation
Location: Angell Sandpit, Storrington
Client: MiBri Ltd
File Reference: P1387

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Figure 3 - HDC SHELAA 2015 ....................................................................................................
1. **Introduction**

1.1. This report has been prepared on behalf of MiBri Ltd in support of their representations to Horsham District Council in response to the Council’s Call for Sites 2018. The Council’s Call for Sites seeks to identify suitable and appropriate sites for future residential development within the District to meet housing needs and to inform the Planning Framework / Local Plan review currently underway.

1.2. This representation relates to the site **Angell Sandpit, Water Lane, Storrington**

1.3. This site has been promoted through previous iterations of the Council’s Strategic Housing Land Availability Assessment but was found to be undeliverable.

1.4. As set out within this document, we provide details of how the site is **suitable, available and achievable** for residential development following the guidance within the National Planning Practice Guidance.

1.5. The following documents have been submitted in support of these representations:

- Planning Representation
- SHELAA Site Submission Form

1.6. The NPPG is clear that in undertaking site assessments Council’s must consider each site positively. The Council is required to consider sites against the adopted development plan whilst also taking into account of how up to date plan policies are.

1.7. In this respect, the Council is required to undertake an early review of the Horsham District Planning Framework (HDPF) within three years (i.e. by 2018). Amendments to the National Planning Policy Framework are also proposed to be released this summer which will place greater pressure on delivery of housing.

1.8. The new standardised methodology for calculating housing need will significantly increase the housing need figure within the District. The housing need figure previously used by the Council on which the HDPF was based (650 new dwellings per annum) will likely be increased by up to 50% (equivalent to 974 new dwellings per annum).

1.9. The assessments for sites must therefore be considered positively given this significant increase in need. The NPPG is clear that the SHELAA assessment should provide details of sites available to meet housing need… **but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs**.

1.10. The assessment therefore shouldn’t unnecessarily exclude sites from consideration without detailed justification. The Development Plan process will determine the most acceptable sites for development / future allocation.

1.11. Furthermore, where constraints to development are considered to exist, the NPPG guidance is clear that Councils are required to consider whether constraints can be overcome:
Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development.

1.12. In our view there are no overriding constraints limiting the development potential for the Angell Sandpit site which should be assessed positively against the requirements of the NPPG.
2. **Storrington**

2.1. The town of Storrington is identified within Policy 3 of the Horsham District Planning Framework to be a ‘Small Town and Larger Villages’ across the District, these being towns that benefit from a “a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements/ each other to meet some of their requirements.”.

2.2. It is considered unlikely that Storrington’s position within the hierarchy of settlements will change through the Local Plan review. In this regard, it is contended that the town should accommodate future residential development that both addresses the organic growth of the town and contributes to meeting the housing need within the District and the settlement itself. The following representations therefore support the allocation of the site to meet the expressed housing need within both the District and village itself through sustainable development.

2.3. It is accepted that the allocation of land to meet the District’s housing need should seek to reflect the presumption in favour of sustainable development and therefore be focused where possible on the settlement hierarchy as identified within Policy 3 of the HDFP. In this regard Storrington represents a very sustainable location for which future development sites should be focussed.

2.4. ECE has previously made representations to the Council regarding housing needs in Storrington with regards to the Neighbourhood Plan allocations. We set out comments previously made (refer to our letter dated 02 October 2017 appended to this document) below:

> It essential that the Neighbourhood Plan is seen to be positively seeking to address housing needs within the local area.

> In our view, the Neighbourhood Plan is allocating in totality around 100 new units when the housing need for the area over the plan period is likely to be in excess of 682 – 992 new homes as discussed below.

> The allocation of the Angell Sandpit site is therefore critical in aiding to meet the pressing housing need facing the Neighbourhood Plan area.

> The Neighbourhood Plan Forum does not appear to have assessed housing need and we were unable to obtain Housing Study published by Storrington Parish Council.

> The recently published Ashington Parish Council Housing Needs Assessment Final Report July 2017 provides a useful local comparison. This study noted an Objectively Assessed Need of around 200 homes for the Parish. On the basis that Ashington is an existing settlement of 922 households, 200 units represents a 21.7% increase on existing levels.

> Applying this rate of increase to the SSW Forum area would provide an objectively assessed housing need figure of **682 new dwellings** (on the basis that there are 3,147 households located within the Forum area (as stated within the Draft Neighbourhood Plan) – applying a 21.7% increase to 3,147 = 682).

> In our previous representations, we argued that the objectively assessed housing need was approximately **992 dwellings** (please refer to our representations dated March 2015).
We note that the recent DCLG consultation on the methodology for calculating Objectively Assessed Need significantly increases the need required within Horsham District. As a sustainable location within the district, Storrington will be required to assist in meeting this need and it is likely that any housing need assessment will take an upward trajectory as a result.

As currently drafted the SSW Neighbourhood Plan allocates around 200 new houses as follows:

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- Ravenscroft Allotments: 70
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Two reserve sites at Old Mill Drive is identified for 20 units and the Post Office Depot is reserved for 10 units bringing the potential total to 221.

However, the inclusion of two of the above sites is questionable. Firstly, the Paula Rosa site has planning permission (and is currently being built out). The application was determined in relation to the Horsham District Planning Framework and should therefore be treated as a windfall site. The inclusion of part I of Policy 2 is therefore questioned. We would strongly argue that the housing figures could not be included within the Neighbourhood Plan and should be removed from the overall housing numbers.

Furthermore, the Post Office Depot site is not available as set out within the Forum’s site assessment report. Unless the Forum has evidence to suggest that this site is likely to come forward over the plan period (ie that the owner has confirmed this) then the site should be removed since it is unachievable.

On this basis, the SSW Neighbourhood Plan Forum would allocate around **100 dwellings** with a reserve site for an extra 20 units. In our view this is an inadequate level of housing to be allocating within the Neighbourhood Plan when a very conservative estimation of the objectively assessed housing need figure is likely to be somewhere in the region of **682 – 992 dwellings** (not including any potential increase in housing need resulting from the recent DCLG proposed changes to OAN methodology).

On this basis, the inclusion of the Angell Sandpit site is essential as set out previously.

We would once again reiterate that the site is developable and deliverable and, in our view, suitable for residential development and we would wish to once again provide assurance on the areas of concern raised last night as follows.

2.5. The site has been allocated within the Draft Neighbourhood Plan for six residential dwellings on this basis as set out within Policy 2 as follows:
2.6. We have made further representations to the Council supporting this allocation and the wording within.

---

**Land at Angell Sandpit, Storrington**

Land at Angell Sandpit, Storrington as shown on the Policies Map, is allocated for housing to accommodate 6 dwellings. The development of the area will be required to:

- Deliver a mix of housing types and sizes including 2 and 3 bedroom properties;
- Achieve access to and from the site via Heather Way;
- Protect the open and green setting to the west of the grade 11 listed building with a buffer zone of at least 45 metres between the listed building and the development. Development to the eastern section of the site should be single storey;
- Provide tree and hedgerow planting within the site to reflect the wooded character of the surrounding area;
- Provide a buffer zone of at least 15 metres to the Sullington Warren Site of Special Scientific Interest (SSSI) with enhancements to nature conservation incorporated into this area; and
- Ensure sensitive positioning of the units to preserve potential views available from the South Downs National Park.
3. The Site

3.1. The site is located to the south of the Sullington Warren and approximately 1km to the south east of Storrington village centre. The developable area as shown in Figure 1 measures approximately 1.2ha and lies on the land off Washington Road/A283, west of Water Lane (the accompanying Location Plan shows the entire site including access on Heather Way and therefore the site size is different to the developable area shown in Figure 1). The site lies adjacent to the built-up area boundary of Storrington to the southern and western boundaries.

3.2. To the south, east and west of the site are low density, large detached dwellings set in generously sized plots. This is especially true of the development located within Angell Sands (a recently developed site to the south) and the development to the south and north of Heather Way. A large detached house set within a generous plot of land is located to the west of the site (High Winds).

3.3. The site is a former working quarry which has been restored and supports scrub and grassland. There are sparse shrubs and immature trees on the boundaries with a more open aspect to the central section. The topography is that of a steeply sloping site rising from the low point on the eastern boundary to higher ground on the west and north western part of the site.

3.4. Further to the east of the site is the working Sandgate Quarry (on the east side of Water Lane) which is also designated as the Sandgate Country Park. The South Downs National Park is located some distance to the south of the site.
3.5. The Angell Sandpit has been erroneously allocated within the Sandgate Country Park policy area within the Horsham Development Planning Framework. The site is a private site in this regard with no public access. The former Angel Sandpit site however is correctly identified as lying outside of this policy area within the Draft Storrington, Sullington and Washington Neighbourhood Plan Policies Map.

Figure 2 - Site Context

3.6. To the north of the site lies Sullington Warren, an area of open recreational space owned by the National Trust. Sullington Warren is a designated Site of Special Scientific Interest, which, according Natural England’s citation for the site, ‘supports a range of heathland habitats including both wet and dry heath, grassland, scrub and woodland. The woodland carries a rich community of breeding birds’.

3.7. To the south, east and west of the site are low density, large detached dwellings set in generously sized plots. A listed building (Chesnut Cottage) is located on the eastern side of the site fronting Water Lane on lower land. To north of the Listed Building is The Lodge, a new residential dwelling with associated garden. Subsequently, the site is surrounded by development on three sides.

3.8. The site is very well screened on boundaries to the north and west by existing vegetation and by virtue of the topography of the site severely limiting views in from these locations. Equally the site is well screened from Water Lane to the east and would also be well screened from Washington Road by virtue of the new development fronting this road (Angel Sands).

3.9. A heritage asset – the Grade II listed ‘Jasmine Cottage School Cottage’ indicated by the red dot in Figure 1, is located on the eastern side of the site fronting Water Lane on lower land.

3.10. Access to the site is clearly possible via Heather Way (as shown within the red edge on the accompanying Location Plan) which runs parallel with the A283. The access has been assessed by both independent consultants and WSCC and it is confirmed that access can be suitably accommodated.

3.11. In terms of access to local services and amenities, the site is located within close walking distance of a Doctor’s Surgery (1.2km), Waitrose supermarket (886m) and a Primary School (813m).

3.12. Additionally, bus stops to Steyning and Pulborough are located either side of Washington Road, approximately 80m from the access to the site, equally within acceptable walking distances.
3.13. With regards to flooding, the site is located within Flood Zone 1.

3.14. Responding to the historic use of the site as a sandpit, any future application for the residential redevelopment of the site will be supported by a full contamination assessment. We understand that low levels of contamination and methane gas may be present which can be dealt with through appropriate mitigation measures as implemented on the recently developed site to the south which also formed part of the former sandpit site (Angell Sands). This is not considered to be a constraint to the development of the site.

3.15. The site is steeply sloping which does limit the development potential of the site. However, this has been reviewed in detail and is not a constraint to deliver of a low density scheme which reflects the pattern of development in the local area.
4. Development Potential

4.1.1. The Angell Sandpit site is considered to have excellent potential for residential development in the short-term.

4.2. The development of this site, on the periphery of the existing built-up area boundary but adjoining it on two sides, would require some modest highways intervention as set out within the letter appended to this representation.

4.2.1. The Neighbourhood Plan allocation stipulates a development of six dwellings including two and three bedroom properties. It also requires a buffer of 15m from the SSSI to the north and a 45m exclusion from the listed building to the east. In tandem with the topography of the site, a low density development of six dwellings meeting these requirements can be accommodated. In this respect, the site size is 1.2ha and is large enough therefore to deliver housing which accommodates these constraints whilst also reflecting and respecting the low density detached character of the local area.

4.2.2. The letters appended to this representation address the concerns which have been raised through the Neighbourhood Plan process and clearly demonstrates that the site is developable and suitable in SHELAA terms.

4.2.3. In terms of the previous SHELAA, the Council assessed the site as being ‘Not Currently Developable’ as set out below:

<table>
<thead>
<tr>
<th>Parish</th>
<th>Storrington and Sullington</th>
</tr>
</thead>
<tbody>
<tr>
<td>SHLAA Reference</td>
<td>SA561 Site Name Angell Sandpit</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Years 1-5 Deliverable</th>
<th>Site Address</th>
<th>Angell Sandpit, Water Lane, Storrington</th>
</tr>
</thead>
<tbody>
<tr>
<td>Years 6-10 Deliverable</td>
<td>Site Address</td>
<td>Greenfield/PDL, Greenfield</td>
</tr>
<tr>
<td>Not Currently Deliverable</td>
<td>Site Total</td>
<td>0</td>
</tr>
</tbody>
</table>

Justification
The landowner has expressed an interest in developing the site, meaning the site is available. The site is well screened from Water Lane and it abuts the existing linear residential development along Washington Road. However the site is in a countryside location abutting the Sullington Warren SSSI meaning it could be sensitive to development. There could also be subsistence issues meaning the site is considered Not Currently Deliverable.

Figure 3 - HDC SHELAA 2015

4.2.4. The reasons for exclusion have previously been addressed (as set out in the letter dated 15 March 2017 appended to this representation). However, we address each point below:

4.2.5. Given that the SHELAA assessment is required to feed into the review of HDPF policy, the location of this site outside of the existing built up area boundary is immaterial and should not be a reason for exclusion on suitability terms. Furthermore, the site is surrounded by development to the south, east and west and in our view Water Lane would make a more logical and defensible boundary than the existing built up area boundary.
4.2.6. With regards to subsidence, the site has been investigated and an indicative technical solution to the provision of suitable foundations has been identified. This is not a constraint to development.

4.2.7. In terms of proximity to the SSSI, the Neighbourhood Plan requires a buffer of 15m to ensure mitigation / avoidance of impact on the designation. This can easily be achieved within the layout for six new dwellings given the size of the site.

4.2.8. There are no other constraints to development. Consideration of landscape impact on views from the South Downs has been made as set out in the previous representations attached to this document. It is considered that development of the site would not lead to any perceptible negative landscape impact.

4.2.9. With regards to heritage, the significant 45m buffer in addition to the requirement that development on the eastern side be single storey and screened would ensure that there is no impact to the significance of the setting of the listed building.
5. **Conclusions**

5.1. These representations and those previously made to the Council demonstrate that there would be no unacceptable impact of development of the site.

5.2. The site is therefore **suitable, available** and **achievable** for residential development contributing toward satisfying the objectively assessed housing need of the District and of Storrington itself.

5.3. The NPPG notes that assessment must assess the following matters (we provide our comments below each point).

- **physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination**;

  This representation demonstrates that whilst there are physical limitations in relation to topography, contamination and ground conditions, the site can easily accommodate a development of six dwellings.

- **potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation**;

  Development would have a negligible impact on heritage assets and landscapes and would not be a reason for excluding sites on suitability grounds. The low density of the site would ensure limited impact on these grounds.

- **appropriateness and likely market attractiveness for the type of development proposed**;

  The types of houses proposed (low density detached dwellings including a mix of sizes) are entirely appropriate to the local setting. The development would undoubtedly market well.

- **contribution to regeneration priority areas**;

  Likely to be limited in this instance although clearly CIL payments would be required which would be used to improve the facilities and infrastructure in Storrington. Clearly development within a sustainable location would also help to sustain the existing services and facilities within the village.

- **environmental/amenity impacts experienced by would be occupiers and neighbouring areas**.

  Development proposal would include a 15m buffer zone on the northern boundary which would enhance the nearby SSSI.

5.4. In addition to the site being **suitable**, we confirm that it is also both **available** in the short term (five years) and **achievable**. We therefore request that the sites are reported as such within the emerging SHELAA 2018.
Dear Ms. Childs,

RE: Representations to the Storrington, Sullington and Washington (SSW) Neighbourhood Plan

We write to you on behalf of our clients (and owners of the site) MiBri Ltd following our attendance at the Storrington Sullington and Washington Neighbourhood Plan Steering Group meeting last week (26.09.17).

It is our understanding that the consultation responses for the Neighbourhood Plan have been received and analysed. We hold some concern that the negative responses have been disproportionately represented by the Steering Group. It is our understanding that there were a significant number of consultees that supported the site’s inclusion and this should be formally recorded and that the majority of respondents were accepting of site inclusion.

We also understand that many of the concerns were raised with regards to more general highways issues. The proposal will address suitable access and furthermore could secure improvements to the existing access point on Heather Way. We seek to address concerns, as well as other matters raised at the meeting, within this letter.

Housing Need

As expressed previously, we have concerns that the proposed Neighbourhood Plan fails to a) identify the housing need for the Forum area and b) seek to meet this need.

It essential that the Neighbourhood Plan is seen to be positively seeking to address housing needs within the local area.
In our view, the Neighbourhood Plan is allocating in totality around 100 new units when the housing need for the area over the plan period is likely to be in excess of 682 – 992 new homes as discussed below.

The allocation of the Angell Sandpit site is therefore critical in aiding to meet the pressing housing need facing the Neighbourhood Plan area.

The Neighbourhood Plan Forum does not appear to have assessed housing need and we were unable to obtain Housing Study published by Storrington Parish Council.

The recently published Ashington Parish Council Housing Needs Assessment Final Report July 2017 provides a useful local comparison. This study noted an Objectively Assessed Need of around 200 homes for the Parish. On the basis that Ashington is an existing settlement of 922 households, 200 units represents a 21.7% increase on existing levels.

Applying this rate of increase to the SSW Forum area would provide an objectively assessed housing need figure of 682 new dwellings (on the basis that there are 3,147 households located within the Forum area (as stated within the Draft Neighbourhood Plan) – applying a 21.7% increase to 3,147 = 682).

In our previous representations, we argued that the objectively assessed housing need was approximately 992 dwellings (please refer to our representations dated March 2015).

We note that the recent DCLG consultation on the methodology for calculating Objectively Assessed Need significantly increases the need required within Horsham District. As a sustainable location within the district, Storrington will be required to assist in meeting this need and it is likely that any housing need assessment will take an upward trajectory as a result.

As currently drafted the SSW Neighbourhood Plan allocates around 200 new houses as follows:

<table>
<thead>
<tr>
<th>Land at Robwell Way (Paula Rosa):</th>
<th>90</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Vineyard’s:</td>
<td>15</td>
</tr>
<tr>
<td>Old Ryecroft allotments</td>
<td>10</td>
</tr>
<tr>
<td>Ravenscroft Allotments</td>
<td>70</td>
</tr>
<tr>
<td>Angell Sandpit</td>
<td>6</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>191</strong></td>
</tr>
</tbody>
</table>

Two reserve sites at Old Mill Drive is identified for 20 units and the Post Office Depot is reserved for 10 units bringing the potential total to 221.
However, the inclusion of two of the above sites is questionable. Firstly, the Paula Rosa site has planning permission (and is currently being built out). The application was determined in relation to the Horsham District Planning Framework and should therefore be treated as a windfall site. The inclusion of part I of Policy 2 is therefore questioned. We would strongly argue that the housing figures could not be included within the Neighbourhood Plan and should be removed from the overall housing numbers.

Furthermore, the Post Office Depot site is not available as set out within the Forum’s site assessment report. Unless the Forum has evidence to suggest that this site is likely to come forward over the plan period (ie that the owner has confirmed this) then the site should be removed since it is unachievable.

On this basis, the SSW Neighbourhood Plan Forum would allocate around 100 dwellings with a reserve site for an extra 20 units. In our view this is an inadequate level of housing to be allocating within the Neighbourhood Plan when a very conservative estimation of the objectively assessed housing need figure is likely to be somewhere in the region of 682 – 992 dwellings (not including any potential increase in housing need resulting from the recent DCLG proposed changes to OAN methodology).

On this basis, the inclusion of the Angell Sandpit site is essential as set out previously.

We would once again reiterate that the site is developable and deliverable and, in our view, suitable for residential development and we would wish to once again provide assurance on the areas of concern raised last night as follows.

Access and Highways

We have previously provided information regarding access onto Heather Way (as set out within our letter dated 14th March). We can confirm that our client can satisfactorily and safely achieve access via Heather Way. Further detailed work would accompany any future application, however, as set out in our previous correspondence, the following assessment made by WSP Group Transport Consultants is considered sufficient.

Heather Way lies within the 30mph speed limit at the edge of Storrington, forming part of the public right of way network (footpath). It appears to go on to serve Heather Lane via other access point(s) to the east. Based on the speed limit, visibility splays at this junction should be in excess of 2.4 x 45m in each direction. To the west (right) visibility is in excess of this; to the east (left) it appears that some trimming of vegetation may be necessary to achieve this.
Heather Lane lies within the 40mph (buffer) speed limit to the east of Storrington including areas up to and including the Water Lane junction. Based on the speed limit, visibility splays at this junction should be in excess of 2.4 x 59m in each direction. At an ‘X’-distance (drivers position of 2m, to the west (right) visibility appears to exceed the ‘y’ distance; to the east (left) it appears that some trimming of vegetation will be necessary to achieve this.

As the access points serve existing dwellings it is in the interests of all properties currently serving Heather Way to improve visibility with enhanced maintenance.

In the event that adjacent property owners seek to obstruct or prevent the potential improvement of visibility it may be possible for the Highway Authority to advance a S79 application (Highways Act 1980) to address this matter.

Maintaining the visibility at this junction serves an important highway function thus it might be reasonable for the development to enter into a S142 Licence (Highways Act 1980) to maintain the trimming of the vegetation and thus preserve and enhance visibility at the junction.

I believe there are in excess of 20 dwellings served by these two access points. As a conflict point on the A283 already exists, increases in traffic on the minor arm will have a small effect on accident potential, however any contribution which preserves or enhances the safety of this junction should make a positive contribution to road safety.

Safe access is therefore clearly achievable from Heather Way. In addition, there is a demonstrable benefit in terms of potentially improving the safety of the residents living at the existing properties of Heather Way and using the existing access points. Furthermore, improvement work can also be secured to Heather Way as part of the proposed development.

Sullington Warren SSSI

We have previously provided information regarding the impact on the SSSI as set out within our letter dated 14th March and as follows:

The Angell Sandpit site to the south of the SSSI lies within Natural England’s SSSI Impact Risk Zones. These zones are used to trigger planning application consultations with Natural England. Subsequently, Natural England would be required to be consulted on any planning application or Development Plan Document (such as the SSW Neighbourhood Plan).

Due to the proximity of the site to the environmental designation, a SSSI Impact Assessment would be required to demonstrate that there are no adverse effects of the development on the environmental designation.
This Impact Assessment will be produced in due course. In the interim, the Ecology Partnership (Ecology Consultancy) has considered the site in relation to the SSSI and provides the following advice prior to the production of the Impact Assessment:

With regards to the pit site, which lies immediately adjacent (south) of Sullington Warren. You are aware that the site abuts a SSSI and as such an impact assessment would need to be completed as part of any application. This impact assessment would cover impacts with regards to habitats and species within the site, i.e. the development boundary, but also address impacts on habitats and species of importance outside the red line boundary. In essence direct impacts and indirect impacts would need to be discussed.

With regards to the site in question. Having reviewed the site, the layout and the design, I can see that there would be no direct impacts on the SSSI. There would be no land loss, land take, habitat fragmentation or habitat isolation resulting from the proposed development on the SSSI. In essence none of the SSSI is to be lost nor will the development result in the SSSI becoming more exposed or isolated in such a way as to make the SSSI less stable in terms of its long term viability.

With regards to indirect impacts, we do have to consider the implications that development has on offsite habitats and look to reduce these to negligible impacts, if this is indeed possible. With regards to this site specifically, the proposals are of modest proportions, with only 6 units proposed within the site boundaries. This reflects on current housing densities around the site. The building of 6 houses alone would not be considered significant. We would have to look at in combination projects, however, I am currently unaware of any applications for large scale developments within the immediate area.

In terms of indirect impacts the following have to be considered; light levels with regards to bats foraging within our site and within the SSSI; increase predation of birds and other species within the SSSI due to increase in residential dwellings around the SSSI by cats; drainage; dust during construction.

The 20m buffer along the northern edge would certainly be significant in terms of reducing/minimising any impact with regards to light levels altering as well as cat predation. The buffer can be enhanced, certainly around the very edges with more thorny species to further reduce any cat incursion into the SSSI. If gorse is present, then this would certainly reduce this. I would suggest that the 20m buffer is kept outside the ownership of the 6 new dwellings and maintained and enhanced as its own entity and linked to the management expectations of the SSSI. As such, there would be no loss of this buffer and therefore the cat issue and lighting issue would not be altered in the long term. I.e. no room for loss of buffer from home owners. I would also suggest no lighting if possible, or low level bollard lighting within the road. Lighting can be conditioned, but by thinking about this up front and developing a lightning plan in the master plan this issue can certainly be removed.
With regards to drainage, I would assume your drainage consultant will ensure that run off is to current green field levels and as such would not impact or alter on the water levels that are currently flowing into the SSSI (if they do at all.). This would be included in our impact report.

Finally with regards to dust/pollution etc during construction. We would recommend a range of measures to ensure that pollution and dust levels are kept to a minimal. This may mean screens established along the 20m buffer, damping down a construction environmental management plan. However, this would only be a short term disturbance and would be minimal, once mitigation is in place, and would not be considered significant.

As such, I believe no direct impacts. Indirect impacts will be mitigated for by the buffer. The buffer does have to be well managed and this must be secured in some financial agreement. If this is in place then I believe impacts would be negligible.

Heritage

The SSW Neighbourhood Plan Forum has previously raised concerns regarding the impact of the proposed development upon the setting of the listed building on Water Lane (Chestnut Cottage). The applicant has been working closely with both the Neighbourhood Plan Forum and Horsham District Council to allay concerns and a significant amount of correspondence has been submitted in this regard.

The recent conjoined Appeal decision for Chestnut Cottage, Water Lane, Storrington (APP/Z3825/D/17/3169769 and APP/Z3825/W/17/3171901) in our view would assist in clarifying the impact on heritage asset. The Appeals were for a replacement dwelling and new dwelling alongside improved access and carport related development within the grounds of the listed building on Water Lane.

The Inspector, in dismissing the Appeal, stated:

*The setting of the cottage, as a listed building, is characterised by the openness of its garden grounds.*

…it is the openness of the cottage’s grounds that is of significance to this listed building’s setting.

In our view it is clear that the significance of the listed building’s setting relates to the curtilage of the building rather than the wider setting.

This clarity on the setting of the listed building confirms the approach advocated by the proponents of the site, reflected within the proposed policy for the Angell site. The proposed development, to be located some significant distance away (45m) from the listed buildings, would have no discernible effect on the openness of the garden grounds of the listed building and would therefore cause no harm to the setting of the listed building.
The Inspector’s report also notes:

*…the overall harm to the listed building would be less than substantial…*

Subsequently, the test for such a proposal as set out within the NPPF would be whether the scheme had any benefits which would weigh in the favour of the development.

Subsequently, through ensuring a buffer of some 45m, with the closest property being single storey, the proposed Angell Sandpit Policy within the Neighbourhood Plan provides significant protection to the wider setting of the listed building and as confirmed above. The proponents of the site are supportive of this approach.

Moreover, the site is circa 1 hectare in size and development of six dwellings would be of a density commensurate with the surrounding rural character taking into consideration the proposed buffer zones to both the SSSI and the heritage asset. Dwellings could be single storey further reducing impact.

Subsequently, in our view there would be no impact on the significance of the heritage assets. However, should it be considered that there was an impact, in our view this would be low on the less than substantial spectrum with regards to paragraphs 132 to 134 of the National Planning Policy Framework. In this respect the scheme would need to be considered with regards to the public benefits of housing provision which as stated previously would weigh heavily in the planning balance.

The Appeal decision notes the verdant appearance of Water Lane. The allocation of Angell Sandpit would not impact on this character by virtue of the significant separation distance between the site and the listed buildings. However, in our view there would be an opportunity to enhance this verdant character through a thoughtful landscaping approach on the site (and as reflected in the policy as drafted).

The proposed buffer zone and sensitive design / landscaping in combination with the low density of any future development would, in our view, ensure that there would be no harm to the significance of the listed building’s setting as a result of site allocation.

**Views from the South Downs**

As set out in previous submissions (please refer to our letter dated 15th March 2017) we do not consider there significant concerns regarding impact from a landscape point of view.

By virtue of the low proposed density of the site and careful consideration to landscaping and massing at the design stage, it is our view that there would be very limited impact on views from the South Downs.
The site is barely perceptible in long range views and it does not represent a prominent or special feature in the landscape when viewed from the South Downs. It is a vacant site which, in such views, is perceived within the context of low density semi rural development and is screened by virtue of the new houses to the south of it. The site is not densely wooded within the central area (proposed for development) which is sparsely vegetated with denser vegetation towards the boundaries.

Subsequently, development would seek to ensure the verdant nature of the semi rural character of the area is maintained and enhanced. The site is not located within the National Park, yet the development of it would by no means negatively impact on the enjoyment of visitors to the National Park or indeed of views northwards from within it. A future planning application would fully demonstrate the careful design and landscaping approach to ensure limited impact in this respect.

Summary

In conclusion, we welcome the allocation of the Angell Sandpit site within the draft Neighbourhood Plan however we are seeking to address some concerns raised in the discussions at the most recent Steering Group meeting. We have therefore sought to reiterate that the proposed development of the site would have no (or very limited) impacts as set out within this letter and that furthermore we strongly urge the Neighbourhood Plan Forum to continue to support the site for allocation within the Neighbourhood Plan in accordance with Policy 2: Site Allocations with respect to part V– Land at Angell Sandpit.

We wish to work proactively and positively with both the Neighbourhood Plan Forum and Horsham District Council on the allocation of this site as making an important contribution towards housing needs in the area.

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

Chris Barker MATP MRTPI
Managing Director
Dear Mrs Euesden,

RE: Representations to the Storrington, Sullington and Washington Neighbourhood Plan

We are writing to you on behalf of our new clients (and owners of the site) MiBri Ltd in support of the allocation of their site at Angel Sandpit for residential development within the emerging Storrington, Sullington and Washington Neighbourhood Plan.

The purpose of this letter is to notify the Neighbourhood Plan Forum Steering Group that the site is no longer being promoted by Millwood Designer Homes and previously submitted proposals are no longer being pursued.

This letter seeks to also address the inaccuracies of the previously published site assessment documents produced by the Neighbourhood Plan Forum. We would like to take the opportunity to highlight these inaccuracies and provide further details in support of the site for inclusion within the emerging Neighbourhood Plan as a residential allocation.

This letter is an amended version of the letter dated 20th December 2016 submitted to both the Neighbourhood Plan Forum and Horsham District Council. The letter set out a proposed development of five dwellings (reduced from previously submitted proposals of 10 – 15 dwellings).

It has since been established that five dwellings falls below the site size criteria imposed by the Neighbourhood Plan Forum (which requires sites of six or more dwellings to be included within the plan). In our view this site yield criteria is not appropriate for the purposes of Neighbourhood Planning which should identify smaller sites suitable for potential development.
The Horsham District Council Housing and Economic Land Availability Assessment utilises the same site size criteria of six new dwellings which is appropriate for the strategic level of the Horsham District Planning Framework. For the purposes of Neighbourhood Planning, more scrutiny towards smaller sites must be made and therefore we are extremely concerned about the appropriateness of such an imposed criteria.

Nevertheless, in the interests of promoting the site through the Neighbourhood Plan process, the site is now being considered for six new dwellings. Please ensure the site is included within your list of sites for consideration within the Neighbourhood Plan. This letter will also be sent to Horsham District Council.

The Site

The land that currently forms Angel Sandpit is located to the west of Water Lane and abuts the settlement boundary of Storrington on two fronts (north and west). The site is bounded by residential development to the east, south and west.

Residential development in this location would follow the continuous form of built development of Storrington Village, as the site abuts the built up area boundary (refer to Figure 1) and would be fully compatible with the residential character of the local area. The site could be accessed via Heather Way and is less than 1km walking distance to Storrington Town Centre.

Figure 1: Site Context

To the east, beyond the residential properties that border the eastern extent of the former Angel Sandpit site lies a working quarry which is also designated as the Sandgate Country Park.
The Angell Sandpit has been erroneously allocated within the Sandgate Country Park policy area within the Horsham Development Planning Framework. The site is a private site in this regard with no public access. The former Angel Sandpit site however is correctly identified as lying outside of this policy area within the Draft Storrington, Sullington and Washington Neighbourhood Plan Policies Map.

Figure 2: Settlement Boundary

To the north of the site lies Sullington Warren, an area of open recreational space owned by the National Trust. Sullington Warren is a designated Site of Special Scientific Interest (SSSI – refer to Figure 3), which, according Natural England’s citation for the site, ‘supports a range of heathland habitats including both wet and dry heath, grassland, scrub and woodland. The woodland carries a rich community of breeding birds’.

Figure 3: Sullington Warren SSSI
To the south, east and west of the site are low density, large detached dwellings set in generously sized plots. A listed building (Chesnut Cottage) is located on the eastern side of the site fronting Water Lane on lower land. To north of the Listed Building is The Lodge, a new residential dwelling with associated garden. Subsequently, the site is surrounded by development on three sides.

![Figure 4: Street Frontage - Washington Road](image1)

The site is very well screened on boundaries to the north and west by existing vegetation and by virtue of the topography of the site severely limiting views in from these locations. Equally the site is well screened from Water Lane to the east (as noted in the Horsham District Council 2016 Strategic Housing and Economic Land Availability Assessment) and would also be well screened from Washington Road by virtue of the new development fronting this road (Angel Sands).

![Figure 5: Street Frontage - Water Lane](image2)

The site is a former sand pit that ceased operation and has been infilled following closure. A restoration plan was subsequently produced for the site (refer to Figure 6 for restoration plan area). Restoration activities are now finished and no active management is undertaken on the site. The site is characterised by sparse shrubs and immature trees on the boundaries with a more open aspect to the central section.
The restoration plan included an area fronting Washington Road and Water Lane which also formed part of the original sand pit. Planning permission for four dwellings was granted on the southern section of the site on appeal (ref: APP/Z3825/A/09/2114514 – the dwellings have been built out and the development is known as Angel Sands).

![Restoration Plan Area](image)

Figure 6: Restoration Plan Area

In determining the Appeal, the Inspector recognised the site’s suitability for residential development on the southern part of the site noting that the site was not part of an allocated area for recreation. Clearly the site’s inclusion as part of an area subject to a restoration plan was not a reason for refusing development.

Furthermore, the Inspector noted that the National Trust, who own and manage the established publically accessible area to the north of the site (the SSSI), had no interest in adding the appeal site at the former sandpit to the area it manages. The site should therefore be considered by the Neighbourhood Plan Forum as previously developed land which is privately owned, with no public access and is therefore clearly not a publically accessible site for recreation.

**Site Potential**

Previously submitted representations identified the potential for approximately 10 - 15 new dwellings on the site. However given the rural-fringe character of the area, a lesser level of development is considered more appropriate.
Subsequently, the site is now being promoted for delivery of **six new dwellings**. The proposal seeks to provide six family sized dwellings, of which there is significant need within the SSWNP area, responding fully to the character of the immediate locality.

![Figure 7 - Indicative Site Plan](image)

A key element of the proposal is to ensure that the SSSI to the north is well protected through the provision of a significant ecological buffer of around 20m. This buffer would extend on the site boundaries and reflects those existing areas of denser vegetation. On these boundaries, immature trees and scrub vegetation is currently developing. The proposal would seek to provide ecological enhancements to these more sensitive retained areas.

The central part of the site which is currently occupied by limited scrub and is predominantly open land has been identified for residential development.

The low density proposal would be entirely in-keeping with the rural-fringe character of the area and reflects and respects the rear boundary of the adjacent property (High Winds). The proposal seeks to replicate the size of plots and dwellings already present in this part of Storrington and would therefore be entirely compatible with the existing character of the area.

Site access can be achieved via Heather Way which is a quiet residential access road and which provides suitable pedestrian access onto Washington Road further to the west. From this point, a good quality footpath provides pedestrians with safe access for the remaining 600m to the town centre. Bus stops are located along this stretch of road offering alternatives transport options.
Horsham District Council Site Assessment

The site has previously been identified by Horsham District Council as being suitable for development. In the Strategic Housing Land Availability Assessment (2014) the site was considered to fall under the 6 dwelling capacity threshold and was discounted for that reason (not because it was unsuitable).

The 2015 SHELAA identified Angel Sandpit under reference SA561 and considered the site developable in years 6 – 11.

The site was subsequently identified as being not currently developable in the 2016 SHELAA for the following reasons:

- **Outside of the built-up area boundary of Storrington.**
- **Site abuts the Sullington Warren SSSI.**
- **Could be subsidence issues.**

These items are addressed in this letter (below).

Neighbourhood Plan Forum Site Assessment

The Neighbourhood Forum Site Assessment document (June 2016) scored the site as set out in Figure 8. The assessment did not accurately score the site on the following items. The letter provides details for how the site meets these criteria and justifies our suggested scoring (as shown in the far right column of Figure 8):

- **Does the site sit within or abut the Built Up Area?**
- **Would development of the site be detrimental to a village greenspace / treasure?**
- **Would development of the site be compatible with the local area?**
- **Would road access to and from the site be likely to cause local traffic congestion / queuing?**

The following sections provide further details to address the inaccuracies of scoring and detail other benefits of the site. Any future scoring must take into account the details as set out in this letter.

### LAND FOR POSSIBLE DEVELOPMENT CRITERIA SCORE SHEET

<table>
<thead>
<tr>
<th>Name of Site.</th>
<th>Sandpit off Water Lane</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Is the site in the SDNP?</strong></td>
<td>Score</td>
</tr>
<tr>
<td>Yes – score 5</td>
<td>0</td>
</tr>
<tr>
<td>No – score 0</td>
<td></td>
</tr>
<tr>
<td><strong>Does the site sit within or abut the Built Up Area?</strong></td>
<td>Score</td>
</tr>
<tr>
<td>Outside – score 5</td>
<td>5</td>
</tr>
<tr>
<td>Abuts – score 2</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Score</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-------</td>
</tr>
</tbody>
</table>
| Would development of the site be likely to prejudice an inter village gap? |       | Very likely - score 5  
                        Quite likely - score 2  
                        Not likely - score 0 | 0            |
| Is the site Brownfield? Greenfield? Residential Infill?                 |       | Brownfield – score 0  
                        Greenfield – score 5  
                        Residential Infill – score 3 | 0            |
| Would development of the site be detrimental to a village greenspace / treasure? |       | Very likely – score 5  
                        Quite likely – score 2  
                        Not likely – score 0 | 5            |
| Would road access to and from the site be likely to cause local traffic congestion / queuing? |       | Very likely – score 3  
                        Quite likely – score 1  
                        Not likely – score 0 | 1            |
| Would development of the site be compatible with the local area?        |       | Incompatible – score 4  
                        Compatible – score 0 | 4            |
| Is the site within the AQMA?                                            |       | Yes – score 3 | 3            |

**Neighbourhood Plan Total Score 15**

**Our Total Score 2**

On the basis of the Neighbourhood Plan Scoring Criteria, the site can only be considered as one of the most sustainable sites in the area.

**Built-up Area Boundary**
Whilst the site is located outside of the built-up area boundary, it clearly abuts it on two sides. It is our view that this arbitrary policy delineation should not be a reason for discounting the site by the Forum since there are sound reasons for its inclusion as a potential development site within the SSW Neighbourhood Plan.

In relation to the scoring as set out above, unequivocally the site abuts the built-up area boundary on two fronts and was incorrectly scored in the site assessment form. Any further scoring of the site must address this point (which was specifically recognised in the examination of the Neighbourhood Plan earlier in the year).

Site of Special Scientific Interest / Impact on Greenspace

As noted the site does indeed abut the SSSI to the north. However, in visual terms there would be no impact on this greenspace. Proposed development would not be visible from any part of the Sullington Warren SSSI due in part to:

- the topography of the area screening the site
- the boundary vegetation around the site / within the SSSI screening the site
- the significant proposed set back from the boundaries on the north – the proposal would not therefore be visible from the SSSI.

Subsequently, purely in visual terms, there would be no impact on the SSSI / greenspace. Scoring of the site by the Neighbourhood Plan Forum must acknowledge this.

The proposal now seeks the provision of a low density scheme of six new homes. In terms of other impacts on the SSSI, this low level of development is not considered to impact in anyway on the habitats of the local greenspace. The SSSI citation is as follows:

> supports a range of heathland habitats including both wet and dry heath, grassland, scrub and woodland. The woodland carries a rich community of breeding birds’

The proposal seeks to enhance the ecological designation to the north through provision of a significant buffer (circa 20m deep). Not only would this separate the proposed development from the SSSI to negate any perceived impact, but it would enhance the SSSI by improving the surrounding habitat. Again it is unclear what impact on the SSSI the proposal would have other than to provide an improved and managed area of habitat.

Scoring of the site must therefore be cognisant of the new proposal and the potential to enhance and improve the SSSI. Any negative score must provide a detailed account of what the impact on local greenspaces would be.
The scoring sheet for the Angel Sandpit site (Figure 8) also referred to Sandgate Country Park which is physically separated from the site by the properties fronting Water Lane (and their gardens) and by Water Lane itself. Indeed only partial glimpses of the Angel Sandpit site are possible from Water Lane.

The Country Park itself is still being used as a Quarry directly east of the Angel Sandpit site. Policy 7 of the Neighbourhood Plan clearly establishes the aspiration for the future creation of the Sandgate Country Park (once minerals works have ceased).

Given that the site to the east of Angel Sandpit is currently an active working minerals site, the Neighbourhood Plan Forum cannot score the site negatively for potential impact on the Sandgate Country Park which is yet to be established (the publically accessible sections of the park are located much further away from the Angel Sandpit site). In this regard, the Sandgate Country Park cannot yet be considered to be a ‘local greenspace’ in the immediate vicinity of Angel Sandpit since it is clearly still a working quarry.

Compatibility with Surrounding Area

The site is surrounded on three sides by low density residential development. As already discussed, development would not be visible from the SSSI to the north. Glimpses may be possible from Water Lane only with the site being well screened on the boundary at Washington Road. It is our view therefore that a proposal of low density development would be entirely compatible with the character of the surrounding area in design terms.

The scoring sheet in Figure 8 notes that the site should be restored to woodland as part of a condition of planning for the approved site to the south. We assume this refers to the Angel Sands site Outline application ref APP/Z3825/A/05/1188915 and Reserved Matters application APP/Z3825/A/09/2114514 both determined at Appeal. No condition in this Appeal decision refers to the entire site being restored to woodland. An indicative landscape plan accompanied the reserved matters application which showed woodland to the boundaries and heath / grassland on the central sections. This has been undertaken and the photograph below shows the existing site conditions.
The proposal seeks to retain an ecological buffer on the northern and western boundary. This would see the retention of areas recently established by immature trees and scrub. The central area (open land) would be the focus for development.

**Access, Traffic and Sustainability**

It is our view that the site is inherently suitable and sustainable and should be favourably considered by the Parish Council as a low density development site providing much needed family sized homes.

The site is considered to be located within a highly sustainable location. The town centre of Storrington is located just 930m from the site as shown in Figure 10. The town centre can be accessed via Heather Way subsequently avoiding Water Lane. This distance is an entirely acceptable walking distance to local shops and facilities as acknowledged by the Neighbourhood Plan Forum. In this respect, it is our view that the proposal is located in a sustainable location with safe and direct access to the town centre.

The site is also well located with regards to employment sites. The town centre is located less than 1km distance but in addition, the Water Lane Trading Estate and Chantry Lane Industrial Estate are both located around 1km from the site.
Rydon Community College is 1km to the north of the site and can be accessed largely off road via footpaths through Sullington Warren. Storrington First School is located 1.6km and can be accessed via footpath.

The proposal for just six dwellings would have a negligible impact on traffic in the area and furthermore there would be no impact in relation to the character of the area in relation to such a minor increase in vehicle movements.

The site has excellent accessibility to open space with the Warren located just 100m to the north of the site and can be accessed via a footpath from Heather Way.

In relation to sustainable transport options, the site is very well served by bus stops on the Washington Road located some 100m away. These stops are less than 2 minutes walking distance from the site and in this regard the site is extremely well located.

Landscape

In long distance views from the South Downs, the proposed low density development would be barely perceptible in part due to the distances involved; by virtue of its low density; and in part due to the site being screened by existing development.

The fact that the proposal would be perceptible does not automatically mean that it would be harmful to the rural-fringe character on this edge of Storrington site. A photograph taken from the South Downs Way (Chantry Post) is included in Appendix A – clearly from this viewpoint, the site is barely perceptible (as would any well-designed future development).

Any development would clearly be integrated and indeed assimilated into the existing development that comprises the settlement of Storrington.

In short distance views from surrounding roads, views of development will be limited as stated due to surrounding existing development. In addition, the proposed ecological buffer could include increased tree planting to enhance the setting of the woodland to the north. This in itself could form an important landscape enhancement.
The proposal of this low density and small scale scheme would not lead to any form of coalescence between settlements.

**Contaminated Land, Subsidence, Flooding**

With regards to the subsidence issues identified by Horsham District Council, the site has been investigated and indicative technical solutions to the provision of suitable foundations has been identified.

The site is not located within an area prone to flooding and has no constraints regarding with surface water. The site is not agricultural land and neither is it located within an AQMA. On these points the site should be considered positively.

Lastly the site is considered to be previously developed land. Initial investigations have shown that should there be residual contamination found on site and that this can be adequately mitigated through a technical engineered solution.

**Heritage and Archaeology**

The site is not located within or near a Conservation Area. Chestnut Cottage (a Listed Building) is located to the east of the site but the proposal is not considered to have any impact on this designation and would not affect the setting of this Listed Building due to the change in levels and the mature intervening vegetation that exists on the site (refer to Figures 5, 11 and 12).

The site is a disused sandpit and subsequently the site has no archaeological value. The Warren to the north has been identified as having some archaeological interest but there is considered to be no link between this site and the Angel Sandpit site.

*Figure 11: Chestnut Cottage*
Housing / Business Need and Supply

The draft SSW Neighbourhood Plan seeks to deliver 285 dwellings over the plan period (2016 – 2032). This is a reduction in 10 dwellings from the Submission SSWNP (2015) which identified a target of 295 dwellings. It is unclear as to why the figure has been reduced.

As set out in previous representations to the Forum, we do not believe that the 295 figure meets the true housing needs of a settlement of the size of Storrington and that the true housing figure is significantly higher. No suitable / up-to-date evidence has been presented by the Forum that identifies a housing need figure.

In this regard, the Draft Neighbourhood Plan Forum must seek to identify and then aim to meet their objectively assessed needs (housing and business needs) as set out in Core Planning Principles (paragraph 17) of the National Planning Policy Framework:

> Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area

The requirement to identify and meet housing and business needs is a fundamental requirement of the National Planning Policy Framework. A basic condition of Neighbourhood Plans is the requirement to have regard to national policies. It is our view therefore that the Forum are failing in their duty to assess the Objectively Assessed Needs against the constraints of the Forum area as supported by the Examiner in not allowing the Neighbourhood Plan to proceed.

Notwithstanding this point, we have serious concerns regarding the identified supply of housing sites to meet the 295 figure and the continued inclusion of certain sites within the draft Neighbourhood Plan as follows:

- **Land at Chantry Lane Industrial Estate, Storrington**
**Land at Robell Way (‘Paula Rosa’), Sullington**

Regarding Chantry Lane, we would reiterate the comments made by the Examiner of the previously submitted SSWNP:

*The Plan and its supporting documents do not contain a sufficiently robust evidence base to assess whether the allocation proposed is acceptable in principle, bearing in mind the location of this site at a particularly sensitive location.*

The Chantry Lane site is located within a protected landscape being sited within the South Downs National Park. The South Downs National Park Authority has objected to the inclusion of this site within the SSWNP. No further evidence has been presented as to how the site could be considered acceptable acknowledging the sensitive location and as such we object to the continued inclusion of this site. Even if the site were considered acceptable, the provision of 90 new dwellings in this sensitive location is highly inappropriate.

Furthermore, the loss of the Chantry Lane industrial site combined with the recently approved scheme at Robell Way would see a significant loss of employment floorspace within the area. No assessment of the loss of employment space or indeed the objectively assessed business needs for the area has been undertaken. Such loss of employment space will have a significant impact on the sustainability of the settlement of Storrington – again this has not been adequately considered by the Forum in our view.

Regarding the land at Robell Way, it is our view that the site cannot be included as an allocation within the Neighbourhood Plan. In the first instance, the allocation would be contrary to the Development Plan (Horsham District Planning Framework) which seeks to retain the site for employment uses. Subsequently, the Neighbourhood Plan would not meet the basic conditions that must be met as set out in the National Planning Policy Guidance (i.e. that the proposal must be in general conformity with the strategic policies contained in the development plan).

Notwithstanding this point, the redevelopment of part of this site has been granted planning permission for 98 new homes. Subsequently, the site must be considered to be a windfall site since it represents a departure from the provisions of the HDPF, and which will also therefore be subject to an extant planning permission. It cannot therefore also be included as an allocation within the Neighbourhood Plan and any housing numbers associated with it cannot be included in the Forum’s housing numbers.

The housing numbers as identified within the Neighbourhood Plan are as follows:

- **Paula Rosa Site, Robell Way** 98 (as approved)
- **Land at Old London Road** 15
- **Land off North St (Ryecroft)** 20
- **Chantry Lane** 90
- **Ravenscroft Allotments** 20
- Land off Old London Road 20
- Upper Old Mill Drive 20
- Post Office Sorting Site 10

The Amberley Road site has been removed from the site allocations since the previous iteration of the draft SSWNP. Clearly the removal of the Amberley Road site and the two key sites of Paula Rosa and Chantry Lane would leave the SSWNP Forum **180 dwellings short** of their 295 figure.

The remaining sites within the plan would therefore not deliver sufficient yield to deliver the full 295 figure. As such, the Forum must seek to allocate other sites to meet this figure – the site at Angel Sandpit can assist in this regard.

**Summary and Conclusion**

The information provided within this letter must be used by the Neighbourhood Plan Forum in assessing and scoring the former Angel Sandpit site as part of their site appraisal exercise for residential development.

This letter has clearly demonstrated that the site meets the following criteria:

**Available** – there is a willing landowner actively supporting the site for residential development.

**Suitable** - as set out in this letter there are no physical constraints to developing the site and other impacts have been overstated or incorrectly considered. The reduction in overall yield on the site should be reconsidered by the Forum at the earliest possibility.

The Examiner previously had many concerns with the manner in which sites had previously been scored – we are not reassured that these concerns have been addressed in the most recent scoring assessment (June 2016).

Furthermore, the Examiner referred to a locational assessment of the sites in relation to their sustainability – we have provided evidence in this letter proving the site to be well located in a sustainable location near to shops, services, facilities and modes of sustainable transport.

**Deliverable** – the site is available for development now, offers a suitable location for development (in a sustainable location abutting the built-up area boundary in accordance with the background text to the draft Neighbourhood Plan) and is achievable. We consider the site can be delivered within the next 5 years.

In this regard, the site meets the definition of deliverability as set out in the National Planning Policy Framework (refer to Footnote 11).
As currently written, the draft SSWNP does not meet the basic conditions that a draft neighbourhood plan or Order must meet in order to proceed to referendum. Subsequently, it is our view that the Draft Neighbourhood Plan runs the risk of failing at examination and / or being challenged for being unsound.

We would strongly urge the Neighbourhood Plan Forum therefore to consider the information provided within this letter and to allocate the site at the former Angel Sandpit site for residential development.

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

Chris Barker MATP MRTPI
Managing Director
Appendix A: View from South Downs Way (Chantry Post)
Appendix C – Indicative Site Sections
Separation Distance – 45m between Chestnut Cottage and new single storey dwellings

Proposal – low density (single storey on eastern boundary – ridge height similar to Chestnut Cottage)

Native screen planting – proposed on site boundary

Chestnut Cottage

Water Lane
Hi Lawrence,

With regards to point 1 this all sounds reasonable and again considering within private land the scope of our comments on this would be limited and likely restricted to advice.

The CMP is not necessary at this stage and can be secured via condition.

Katie

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From: Lawrence Stringer [mailto:LStringer@gtacivils.co.uk]
Sent: 12 December 2017 09:23
To: Katie Kurek
Cc: Naomi Hoyland
Subject: RE: Angell's Sandpit, Storrington

Hi Katie,

Thank you for your email and comments. I agree that it was helpful to meet up on site.

I have arranged for the access roads to be surveyed including the A283 frontage so that we can demonstrate the available visibility at each access and what improvements we can show. I will get these too you as soon as I can.

I have a few observations/comments:

1. In terms of the width, I agree that a 5.5m width is appropriate for the junctions with the A283 and I suggest we show this for the first 10m back from the channel of the A283. For the eastern access, we can provide a decent width up to the junction with the east-west route (the route from Heather Way) so I don’t think there’s any need for passing bays along this stretch. For the western access from Heather Way, beyond the initial surfaced section (where we parked) currently the access is only about 2.5m wide so widening to 5.5m would drastically change the character and I believe would be unnecessary. I suggest we show this stretch through to the site at 3m with passing bays say every 50m or so and appropriate widening on bends. I will also do the vehicle tracking for the refuse vehicle (I’ll check the size they use). Let me know if you are happy with this approach?

2. With regard to the Construction Management Plan, is this definitely required at this stage or can it wait to post planning and be a condition?
Hi Lawrence,

Thanks for meeting on site with us earlier in the week. Please find below formal pre-application comments regards development for 5/6 dwellings accessed via the privately maintained Heather Way:

On site we discussed the principle of the small-scale development as unlikely to cause a significant increase on additional vehicle movements from Heather Way on to Washington Road. We discussed the two separate junctions on to the public highway and you were advised that demonstrating maximum achievably visibility from both could be an option to demonstrate the preferred access route to the development. The western most access afforded improved visibility however, I acknowledge that which route residents associated with the proposed development and indeed the existing
dwellings served by this network of private access roads, would be challenging to control or condition. I acknowledge the restrictions to visibility from the eastern most access and notwithstanding land ownership concerns would be happy to review a plan of amended access at this point and available visibility splays, as discussed.

With regard to the proposed route from the western access, there is scope to widen and formalise the access road by providing passing places. There are some references to passing bay widths and spacing within DMRB and some DfT site-specific documents. I would advise that as per MfS, 5.5-metre total width of access road and passing bay generally is sufficient to accommodate passing traffic. Each bay should be of appropriate length to enable a car or refuse collection vehicle to pull in and pass and ideally each should be visible from the previous. Considering the geometry of the private access road this may not be possible and I would therefore advise that widening at corners in the route would be beneficial. The most efficient way to demonstrate the proposed widening/ passing bay works would of course be via swept path tracking and you were advised that HDC, as the Waste Collection Authority should be consulted regard their preferred route for collection.

Considering the restraints of the site, I also advise that a comprehensive Construction Management Plan be provided at full planning application stage detailing management of deliveries, routes etc.

With regard to the PROW I have attached a plan indicating the route of these by our records and have consulted the PROW Officer for the area. I will of course forward on any comments she wishes to make to you. I also attach a plan detailing the extent of the publically maintained highway as discussed.

As I am sure you will appreciate these comments are made without prejudice to any future planning application at this site. If you have any further queries please do not hesitate to contact me.

Kind Regards

Katie

**Miss Katie Kurek | BA MCIHT | Technician**
Monitoring & Records Team – Planning Services - Economy, Planning and Place Directorate
West Sussex County Council

**Location:** Ground Floor Northleigh, County Hall, Chichester, PO19 1RH  
**Contact:** Internal: 25730  External: 0330 222 5730  E-mail:katie.kurek@westsussex.gov.uk
Appendix E – Land Registry Plans and Accompanying Letters Regarding Access
TO WHOM IT MAY CONCERN

I write to confirm that I am the sole remaining beneficiary of the late B.J. Hecks estate and as such am the registered freehold owner of the land comprising the access roads and lanes known as Heather Way and Woodpecker Lane.

In the event of a Town Planning approval being granted for residential development of a type in keeping with the existing character of the immediate area on land adjacent to Angels Sandpit at Sullington Warren, I would be mindful to treat with the developers, subject to satisfactory terms; to grant consent for them to undertake any necessary works to the roads/lanes as required by conditions imposed within the planning consent and to cause only minimum disturbance to the existing residents all to the satisfaction of the Local Authorities with the ultimate grant of access to pass and re-pass over the land in my ownership to serve the new development but strictly NOT for transport of any kind being plant, machinery or trade vehicles for use in the construction of the new development (access should be obtained via Water Lane).

Judith P Robinson
13 August 2018

Mr Sam Sykes
ECE Planning
Brooklyn Chambers
11 Goring Road
Worthing
West Sussex
BN12 4AP

TO WHOM IT MAY CONCERN

I confirm that I am the registered freehold owner of the land composing the access road to Angell Sandpit leading from the Angell Sands development at the corner of Water Lane and Washington Road and that I am able to use this access for construction traffic should planning permission be granted. For the record, it should be noted that the same access was used during the construction of Angell Sands, hence it is fit for this purpose.

I attach copies of the copy title and plan to confirm my ownership.

Yours sincerely,

[Signature]

Brian Wilkinson
Title Number: WSX186262

This title is dealt with by HM Land Registry, Durham Office.

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

Neither this extract nor the full copy is an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy.

This extract shows information current on 14 NOV 2017 at 14:19:38 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

REGISTER EXTRACT

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<tr>
<td>Title Number</td>
<td>WSX186262</td>
</tr>
<tr>
<td>Address of Property</td>
<td>land and buildings on the north side of Washington Road, Storrington, Pulborough (RH20 4DE)</td>
</tr>
<tr>
<td>Price Stated</td>
<td>£650,000</td>
</tr>
<tr>
<td>Registered Owner(s)</td>
<td>BRIAN WILKINSON and MICHELLE LORRAINE WILKINSON of 2 Angell Sands, Storrington, Pulborough RH20 4FL.</td>
</tr>
<tr>
<td>Lender(s)</td>
<td>None</td>
</tr>
</tbody>
</table>
Title number WSX186262

This is a copy of the register of the title number set out immediately below, showing the entries in the register on 14 NOV 2017 at 14:19:38. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

This copy is not an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy. If you want to obtain an official copy, the HM Land Registry website explains how to do this.

A: Property Register

This register describes the land and estate comprised in the title.

WEST SUSSEX : HORSHAM

1 (01.03.1994) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land and buildings on the north side of Washington Road, Storrington, Pulborough (RH20 4DE).

2 (01.06.2005) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.

3 (01.06.2005) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

4 (28.10.2011) The land has the benefit of the rights reserved by but is subject to the rights granted by the Transfer dated 7 October 2011 referred to in the Charges Register.

5 (03.07.2012) The land has the benefit of the rights reserved by but is subject to the rights granted by the Transfer dated 29 May 2012 referred to in the Charges Register.

6 (13.08.2012) The land has the benefit of the rights reserved by but is subject to the rights granted by a Transfer of the land edged and numbered WSX352009 in green on the title plan dated 29 May 2012 made between (1) Peter Raymond Gamble and Ian Michael Gamble and (2) John Mcleish Ramage and Anna Margaret Tamsin Ramage.

NOTE: Copy filed under WSX352009.

7 (05.09.2012) The land has the benefit of the rights reserved by but is subject to the rights granted by the Transfer dated 28 August 2012 referred to in the charges register.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (04.11.2014) PROPRIETOR: BRIAN WILKINSON and MICHELLE LORRAINE WILKINSON of 2 Angell Sands, Storrington, Pulborough RH20 4FL.

2 (28.10.2011) RESTRICTION: No disposition of the registered estate other than a charge by the proprietor of the registered estate or by the proprietor of any registered charge is to be registered without a certificate signed by a conveyancer that the provisions of clause 3.3.7 and 4.7 of the Transfer dated 7 October 2011 referred to in the Charges Register have been complied with.

3 (03.07.2012) RESTRICTION: No disposition of the part registered estate tinted blue on the plan annexed to the Transfer dated 29 May 2012 referred to in the charge register (other than a charge) by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of
Title number WSX186262

B: Proprietorship Register continued

this restriction, is to be registered without a certificate signed by a conveyance that the provisions of clause 3.3.6 and 4.5 of the Transfer have been complied with.

4 (05.09.2012) RESTRICTION: No disposition of the part of the registered estate tinted blue on the plan annexed to the Transfer dated 28 August 2012 referred to in the charges register (other than a charge) by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a certificate signed by a conveyancer that the provisions of clause 3.3.7 and 4.4 of the Transfer have been complied with.

5 (04.11.2014) The price stated to have been paid on 15 October 2014 was £650,000.

6 (04.11.2014) The Transfer dated 15 October 2014 referred to in the Charges Register contains purchaser's personal covenants.

NOTE:-Copy filed.

7 (12.11.2014) RESTRICTION: No disposition of the black land referred to in the Transfer dated 15 October 2014 referred to in the Charges Register (other than a charge) by the proprietor of any registered charge, not being a charge registered before the entry of this restriction is to be registered without a written consent signed by Simon Peter Gamble of 39 Chesswood Road, Worthing, BN11 2AA, Philip Gamble of 155 Rowlands Road, Worthing, BN11 3LH, and Ian Michael Gamble of Danhill Farm, Harbolets Road, West Chiltington, Nr Pulborough, West Sussex, RH20 2LQ, or their conveyancer.

8 (12.11.2014) RESTRICTION: No disposition of the registered estate (other than a charge) by the proprietor of the registered estate or by the proprietor of any registered charge is to be registered without a certificate signed by a conveyancer that the provisions of the Transfer dated 15 October 2014 referred to in the Charges Register have been complied with.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (01.03.1994) The land is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 4 August 1965 made between (1) Ethel May Hecks and others (Vendors) and (2) Slaughter Barton & Co Limited (Purchaser):

"EXCEPT AND RESERVING unto the Vendors all rights and easements in or over the said property as hitherto used and enjoyed by the Vendors or their predecessors in title and all persons deriving title under them or either of them as the owners or occupiers of the adjoining property."

2 (09.03.2011) The land is subject to the rights granted by a Transfer of the land edged and numbered WSX341947 in green on the title plan dated 2 March 2011 made between (1) Peter Raymond Gamble and Ian Michael Gamble and (2) Julian Price Aviss and Amanda Jane Aviss.

NOTE: No copy of the deed referred to is held by Land Registry.

3 (28.10.2011) A Transfer of the land edged and numbered WSX346214 on the title plan dated 7 October 2011 made between (1) Peter Raymond Gamble and Ian Michael Gamble and (2) Keith Whittington and Susan Carol Whittington contains restrictive covenants by the transferor.

NOTE:-Copy filed under WSX346214.

4 (03.07.2012) A Transfer of the land edged and numbered WSX351208 in green on the title plan dated 29 May 2012 made between (1) Peter Raymond Gamble and Ian Michael Gamble and (2) John Mcleish Ramage and Anna Margaret Tamsin Ramage contains restrictive covenants by the
Title number WSX186262

C: Charges Register continued

transferor.

NOTE:-Copy filed under WSX351208.


NOTE: Copy filed under WSX352393.


NOTE: Copy filed.

End of register
Title number WSX186262
Ordnance Survey map reference TQ0914SE
Scale 1:2500
Administrative area West Sussex : Horsham

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This title is dealt with by HM Land Registry, Durham Office.
Title Number : WSX255774

This title is dealt with by HM Land Registry, Durham Office.

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

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This extract shows information current on 14 NOV 2017 at 13:13:44 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

**REGISTER EXTRACT**

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<th>Title Number</th>
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<tr>
<td>Address of Property</td>
<td>Land adjoining Three Gates, Washington Road, Storrington</td>
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<tr>
<td>Value Stated</td>
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</tr>
<tr>
<td>Registered Owner(s)</td>
<td>JUDITH PHILLIPA ROBINSON of Oaklands Farm House, Hurston Lane, Storrington, Pulborough, West Sussex RH20 4HH and of 23 Peterborough Road, Harrow, Middlesex HA1 2BD.</td>
</tr>
<tr>
<td>Lender(s)</td>
<td>None</td>
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</table>
Title number WSX255774

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A: Property Register

This register describes the land and estate comprised in the title.

WEST SUSSEX : HORSHAM

1  (04.06.2001) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Land adjoining Three Gates, Washington Road, Storrington.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1  (04.06.2001) PROPRIETOR: JUDITH PHILLIPA ROBINSON of Oaklands Farm House, Hurston Lane, Storrington, Pulborough, West Sussex RH20 4HH and of 23 Peterborough Road, Harrow, Middlesex HA1 2BD.

2  (04.06.2001) The value stated as at 4 June 2001 was £55,000.

3  (13.04.2012) The proprietor's address for service has been changed.

C: Charges Register

This register contains any charges and other matters that affect the land.

1  (04.06.2001) The land is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 2 November 1920 made between (1) The Right Honourable Charles Henry Baron Leconfield (Vendor) (2) Charles John Wyndham and Vincent Wodehouse Yorke (Trustees) and (3) Bernard Jack Hecks (Purchaser):-

EXCEPT ALWAYS AND RESERVED unto the Vendor his sequels in estate and assigns full right for him and them or other the owner or owners for the time being of any lands adjoining neighbouring or opposite to the hereditaments and premises hereby assured to erect or suffer to be erected any buildings or erections upon or to deal in any way that he or they shall think fit with such adjoining neighbouring or opposite land notwithstanding the light or the passage thereof to the said hereditaments and premises hereby conveyed or any buildings for the time being thereon shall be hereby obstructed diminished prejudiced or affected.

2  (04.06.2001) The land shown tinted blue on the filed plan is subject to rights of way in favour of owners of adjoining properties.

End of register
This is a copy of the title plan on 14 NOV 2017 at 13:13:44. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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This title is dealt with by HM Land Registry, Durham Office.
Title Number : WSX342757

This title is dealt with by HM Land Registry, Durham Office.

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

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<td>Lender(s)</td>
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1 of 3
Title number WSX342757

This is a copy of the register of the title number set out immediately below, showing the entries in the register on 14 NOV 2017 at 13:10:19. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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A: Property Register

This register describes the land and estate comprised in the title.

WEST SUSSEX : HORSHAM

1 (04.05.2011) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Heather Way, Storrington, Pulborough.

2 (23.12.2011) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (04.05.2011) PROPRIETOR: JUDITH PHILLIPA ROBINSON of Oaklands Farm House, Cootham, Storrington, Pulborough, West Sussex RH20 4HH and of 23 Peterborough Road, Harrow, Middlesex HA1 2BD.

2 (04.05.2011) The value stated as at 4 May 2011 was £100,000.

3 (13.04.2012) The proprietor's address for service has been changed.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (04.05.2011) The land is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 2 November 1920 made between (1) The Right Honourable Charles Henry Baron Leconfield (Vendor) and (2) Charles John Wyndham and Vincent Wodehouse Yorke (Trustees) and (3) Bernard Jack Hecks (Purchaser):

EXCEPT ALWAYS AND RESERVED unto the Vendor his sequels in estate and assigns full right for him and them or other the owner or owners for the time being of any lands adjoining neighbouring or opposite to the hereditaments and premises hereby assured to erect or suffer to be erected any buildings or erections upon or to deal in any way that he or they shall think fit with such adjoining neighbouring or opposite land notwithstanding the light or the passage thereof to the said hereditaments and premises hereby conveyed or any buildings for the time being thereon shall be hereby obstructed diminished prejudiced or affected.

2 (10.03.2016) The land is subject to the rights granted by a Conveyance of Sullington House dated 28 January 1928 made between (1) Bernard Jack Hecks and (2) Hilda Constance Teevan.

NOTE: Copy filed under WSX376536.
Title number WSX342757

End of register
This is a copy of the title plan on 14 NOV 2017 at 13:10:19. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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This title is dealt with by HM Land Registry, Durham Office.
Title Number : WSX267120

This title is dealt with by HM Land Registry, Durham Office.

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

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This extract shows information current on 14 NOV 2017 at 13:38:05 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

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<tr>
<td><strong>Address of Property</strong> : land adjoining Sullington House, Washington Road, Storrington, Pulborough, (RH20 4DE)</td>
</tr>
<tr>
<td><strong>Value Stated</strong> : £55,000</td>
</tr>
<tr>
<td><strong>Registered Owner(s)</strong> : JUDITH PHILLIPA ROBINSON of Oaklands Farm House, Hurston Lane, Storrington, Pulborough, West Sussex RH20 4HH and of 23 Peterborough Road, Harrow, Middlesex HA1 2BD.</td>
</tr>
<tr>
<td><strong>Lender(s)</strong> : None</td>
</tr>
</tbody>
</table>
Title number WSX267120

This is a copy of the register of the title number set out immediately below, showing the entries in the register on 14 NOV 2017 at 13:38:05. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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A: Property Register

This register describes the land and estate comprised in the title.

WEST SUSSEX : HORSHAM

1 (03.10.2002) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being land adjoining Sullington House, Washington Road, Storrington, Pulborough, (RH20 4DE).

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (03.10.2002) PROPRIETOR: JUDITH PHILLIPA ROBINSON of Oaklands Farm House, Hurston Lane, Storrington, Pulborough, West Sussex RH20 4HH and of 23 Peterborough Road, Harrow, Middlesex HA1 2BD.

2 (03.10.2002) The value stated as at 3 October 2002 was £55,000.

3 (13.04.2012) The proprietor's address for service has been changed.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (03.10.2002) The land is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 2 November 1920 made between (1) The Right Honourable Charles Henry Baron Leconfield (Vendor) and (2) Charles John Wyndham and Vincent Wodehouse Yorke (Trustees) and (3) Bernard Jack Hecks (Purchaser):

EXCEPT ALWAYS AND RESERVED unto the Vendor his sequels in estate and assigns full right for him and them or other the owner or owners for the time being of any lands adjoining neighbouring or opposite to the hereditaments and premises hereby assured to erect or suffer to be erected any buildings or erections upon or to deal in any way that he or they shall think fit with such adjoining neighbouring or opposite land notwithstanding the light or the passage thereof to the said hereditaments and premises hereby conveyed or any buildings for the time being thereon shall be hereby obstructed diminished prejudiced or affected.

End of register
Appendix F – Access Plan (7053/100 Rev B.)
Appendix G – Tracking Plan (7053/101 Rev A)
1. The location, size, depth and identification of existing services that may be shown or referred to on this drawing have been assessed from non-intrusive observations, record drawings or the like. The contractor shall safely carry out intrusive investigations, trial holes or soundings prior to commencing work to satisfy himself that it is safe to proceed and that the assessments are accurate. Any discrepancies shall be notified to GTA prior to works commencing.

2. Tender or billing drawings shall not be used for construction or the ordering of materials.

3. Do not scale. All dimensions and levels to be site confirmed.

4. This drawing shall be read in conjunction with all relevant architects, consultants drawings and specifications, together with H&S plan requirements.

5. Copyright: This drawing must not be copied, amended nor reproduced without the prior written agreement of GTA.

6. All drawings, specifications and recommendations made by GTA are subject to Local Authority and other relevant statutory authorities approval. Any works or services made abortive due to the Client proceeding prior to these approvals is considered wholly at the Client's risk. GTA holds no responsibility for resulting abortive works or costs.
Appendix H – Appeal Ref: APP/Z3825/D/17/3169769 and Ref: APP/Z3825/W/17/3171901
Appeal Decisions
Site visit made on 26 July 2017

by Grahame Gould BA MPhil MRTPI
an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 15th August 2017

Appeal A Ref: APP/Z3825/D/17/3169769
Chestnut Cottage, Water Lane, Storrington RH20 3LY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr and Mrs Julian Aviss against the decision of Horsham District Council.
- The application Ref DC/16/1905, dated 18 August 2016, was refused by notice dated 30 November 2016.
- The development proposed is described as ‘double carport for Chestnut Cottage’.

Appeal B Ref: APP/Z3825/W/17/3171901
Chestnut Cottage, Water Lane, Storrington RH20 3LY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mrs Jaye Ford against the decision of Horsham District Council.
- The application Ref DC/16/1904, dated 18 August 2016, was refused by notice dated 21 December 2016.
- The development proposed is described as ‘replacement dwelling, improved access and with one new dwelling on site adjacent to Chestnut Cottage’.

Decision
1. Appeals A and B are dismissed.

Procedural Matter
2. Appeal A would involve the siting of a double carport to the rear of Chestnut Cottage (the cottage) and would also include the use of a new engineered drive that would provide access to the carport. Appeal B would involve the demolition of the dwelling contained in the converted garage (the lodge), sited to the side of the cottage, and its replacement with two detached houses. The new houses would also use the new drive.

3. While the appeals involve different developments, they concern the same host property and are clearly related to one another. I have therefore considered the appeals concurrently.

Main Issues
4. The main issues are:
   - the effect of the development on the character and appearance of the area and the setting of the cottage as a grade II listed building – appeals A and B;
• whether the site would be a suitable location for an additional dwelling – appeal B;
• the effect of the carport and drive on the living conditions of the occupiers of School Cottage, with particular regard to noise – appeal A; and
• the effect of the new houses on the habitat for protected species – appeal B.

Reasons

Character and Appearance and listed building setting – appeals A and B

5. The cottage is one half of a pair of semi-detached houses, the other half being School Cottage. The cottages date from the eighteenth century and were originally built as the village school. The cottage is set in a wide plot and the lodge, which is a building dating from the 1970s, occupies part of that plot. The cottage and the lodge share a drive and parking area, served by a single vehicular access point.

6. While there is some residential ribbon development along Water Lane at this point and an active quarry directly opposite, the lane has a verdant appearance, with it being lined by hedges and trees. While the infill development at 1 to 4 Angell Sands (Nos 1 to 4) has a more urban appearance, I found it to relate more closely with the continuous ribbon of dwellings fronting Washington Road on its approach to the centre of Storrington. As Angell Sands have replaced ‘several light industrial units’ that development is not directly comparable with the proposals subject to appeals A and B. The residential development on Water Lane, beyond Nos 1 to 4, is of a less intense and looser form than that on Washington Road and is consistent with its rural location.

7. The house that would replace the lodge and the extra house would both be significantly larger than the lodge and their provision would involve the cottage’s grounds being formally sub-divided into three plots. The lodge is modestly scaled and I found there to be nothing particularly objectionable about its appearance, such as to warrant it being replaced by two much larger houses. I consider that the development would result in the cottage’s grounds having a much harder and more urban and regimented appearance, which would be incompatible with the low density, rural character of Water Lane. The trees and evergreen hedge along the site’s frontage would provide some screening for the house replacing the lodge. However, the extra house, because of the sloping nature of Water Lane and its proximity to the vehicular access would not benefit to the same degree from the presence of the roadside trees and hedging.

8. The formation of the new drive would contribute to the hardening in the area’s appearance, with it being beyond the cottage’s garden in an area that has not been fully restored following the closure of a former quarry. Although the drive would occupy an area of scrub I nevertheless consider it would be at odds with the area’s rural character. I also consider that the formation of the drive would not be directly comparable with the existing drive and parking area, which I found to have an appearance that is compatible with the scale of the cottage and the lodge.
9. I am therefore of the opinion that the developments in their totality would be harmful to the rural character and appearance of the area, harm that could not be overcome by the imposition of reasonable planning conditions. Although the site constitutes previously developed land, I consider that the benefit arising from the reuse of such land is outweighed by the harm that I have identified.

10. The setting of the cottage, as a listed building, is characterised by the openness of its garden grounds. The extent of those essentially open grounds is to be expected of a house in a rural location such as this and it is the openness of the cottage’s grounds that is of significance to this listed building’s setting. While the lodge is an independent dwelling, given its siting, modest scale and design, it has the appearance of being clearly subservient to the cottage. The replacement house would be much larger than the lodge and it, together with the extra house and the new drive, would collectively significantly reduce the openness of the cottage’s grounds. The developments would change the character of this cottage’s grounds from garden land to a much more intense residential development. I consider that the scale of the developments would dominate the cottage rather than being subservient to it.

11. I therefore find that there would be significant harm to the listed building’s setting and that the listed building’s setting would not be preserved.

12. For the reasons given above I conclude that the development subject to appeals A and B would be harmful to the character and appearance of the area and would fail to preserve the setting of a listed building. The developments would therefore be in conflict with Policies 2, 25, 26, 32 and 33 of the Horsham District Planning Framework (excluding South Downs National Park) of 2015 (the HDPF). That is because the developments would: not conserve or enhance the rural character of the area; fail to complement the heritage value of the site and the sense of space around it; and be unsympathetic of its surroundings. There would also be conflict with Policy 34 of the HDPF because the developments would fail to retain or improve the setting of a heritage asset.

13. With regard to the provisions of paragraphs 132 to 134 of the National Planning Policy Framework (the Framework), I consider that while there would be significant harm to the setting of the cottage, the overall harm to the listed building would be less that substantial, given that neither development would alter the listed building’s physical fabric. That being said I consider that there would be no public benefits, including the improvement to the visibility for drivers emerging onto Water Lane, weighing significantly in favour of the developments. The absence of substantial harm to the listed building, in the Framework’s terms, however, does not usurp the statutory duty to pay special regard to the desirability of preserving its setting.

**Suitability of the location for an additional house – Appeal B**

14. As the development subject to appeal B would involve a net increase of one dwelling, I consider it is the extra dwelling, as opposed to the replacement house, which falls to be considered under this issue.

15. The extra house would be located a little beyond Storrington’s built-up area boundary (BUAB). Storrington is a small town/larger village for the purposes of the HDPF’s settlement strategy. The extra house would therefore be in a
location where new development is discouraged by Policies 2, 3, 4 and 26 of the HDPF, with the growth strategy across the Council’s area seeking to focus new development in the main settlements rather than the countryside. Policy 26 indicates that the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Policy 26 goes onto state that any development must be essential to its countryside location and should: support the needs for agriculture and forestry; enable the extraction of minerals or the disposal of waste; provide for quiet informal recreational use; and enable the sustainable development of rural areas.

16. The extra house would not meet the first three of the above mentioned exceptions referred to in Policy 26 of the HDPF and, as I have concluded above, this development would also cause unacceptable harm to the character and appearance of the area. There would therefore be conflict with Policy 26 of the HDPF. I am mindful of the fact that there has been a recent substantial development at Millford Grange to the east of Water Lane and that Nos 1 to 4 are of fairly recent construction. However, both of those developments were granted planning permission prior to the HDPF’s adoption and it is necessary to determine appeal B having regard to the extant development plan policies. While the extra house would be closer to the centre of Storrington than the houses at Millford Grange, I consider that factor to be of little consequence. That is because not only is there no rural needs justification for the extra house, but its construction would also be harmful to the appearance of the area, as well as the setting of a listed building.

17. I therefore conclude that this would be an unsuitable location for an extra house, with there being conflict with Policies 2, 3, 4, and 26 of the HDPF.

Living conditions for the occupiers of School Cottage – Appeal A

18. When regard is paid to the likely frequency of the drive’s use and the degree of physical separation there would be between it and School Cottage and its garden, I consider that the use of the drive would not give rise to levels of noise that would be disturbing for the occupiers of School Cottage.

19. On this issue I conclude that the development subject to appeal A would not be harmful to the living conditions of the occupiers of School Cottage. There would therefore be no conflict with Policy 33 of the HDPF because the noise associated with the use of the carport and the new drive would not cause harm to the living conditions (amenity) of the occupiers of School Cottage.

Protected species – appeal B

20. The ecological evidence submitted by the appellant with appeal B includes species specific reports for bats, dormice and reptiles. The bat report identifies the lodge as having high bat roosting potential, on an occasional basis, by a small bat population. Some mitigation for bats would therefore be required. Details of a bat mitigation strategy are contained in the fifth appendix to the bat report and there is no suggestion from the appellant’s ecologist that it would not be possible to provide an appropriate level of mitigation for roosting bats. During the course of the dormice survey no dormice were found to be present, although further surveying has been recommended by the appellant’s ecologist.

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1 Subject to planning application DC/11/1457 and allowed on appeal (APP/Z3825/A/12/2176793)
21. The survey for reptiles identified the presence of slow-worms, grass snakes and common lizards, respectively at medium, low and medium populations. Details of the outline of a reptile mitigation strategy are included in the reptile report and there is nothing within this report that suggests that appropriate mitigation could not be provided.

22. The Council has submitted no evidence of its own demonstrating that appropriate mitigation could not be provided commensurate with the populations of bats, dormice and reptiles frequenting the site. On the available evidence I therefore conclude that the development subject to appeal B would not cause unacceptable harm to the habitat for protected species. I therefore find that the development subject to appeal B would not conflict with Policies 2 and 31 of the HDPF because there would be no unacceptable harm to the area’s biodiversity.

Other Matters

23. I recognise that the development subject to appeal B would not be harmful to the living conditions of the occupiers of any neighbouring dwellings and that there would be no adverse effect on highway safety. Those are matters weighing in favour of the development, however, I find them to be outweighed by the harm that I have identified.

Conclusions

24. I have found that there would be no unacceptable harm to the habitat for protected species (appeal B) and that the noise associated with the use of the new drive, as an access to the carport, would not harm the living conditions of the occupiers of School Cottage (appeal A). However, I have found that both developments would cause unacceptable harm to the character and appearance of the area and would fail to preserve the setting of the cottage as a listed building. I have also found that this would be an unsuitable location for an extra house. I therefore consider that the developments would be unsustainable, when the HDPF is read in the round.

25. I therefore conclude that appeals A and B should both be dismissed.

Grahame Gould
INSPECTOR