

Independent Examiner
Storrington, Sullington & Washington Neighbourhood Plan
By email only to: neighbourhood.planning@horsham.gov.uk

5 September 2018

Dear Sir,

Storrington, Sullington & Washington Neighbourhood Plan Examination Written Response to Question 2

We write on behalf of Cayuga Developments in relation to Vineyards site, Washington.

In your questions for the public hearing on the Storrington, Sullington & Washington Neighbourhood Plan you have invited comments on the following question:

“In view of the previous examiner’s conclusions regarding the allocation for The Vineyard - Land off of Old London Road, has there been any changes since that time to indicate that it is now a sustainable location for a major development?”

Our written statement is attached as Appendix A. As we have not previously provided representation on this site, the Examiner’s requirement to limit our Statement to a single side of A4 is restrictive given the various dimensions to sustainability. We have provided our response as succinctly as possible within these restrictions but recognise that further detail may be required in the form of written submissions, mapping or evidence and we would be happy to provide this.

The previous examination of the last iteration of the Neighbourhood Plan concluded that “Old London Road, Washington is not a sustainable location for residential development”. Our Statement will show you that this conclusion was based on an inaccurate assessment of the site’s sustainability (the relevant paragraph has now been superseded/removed in the revised National Planning Policy Framework). The previous Examiner also criticised the site selection methodology that underpinned the previous Plan, and this has now been updated and provides a robust evidence base for the allocations made within the revised Plan.

The Sustainability Appraisal submitted alongside the Neighbourhood Plan appropriately weighs the sustainability impacts and appropriately assesses relevant considerations.

All the facilities previously identified in the NPPF (2012) paragraph 38 can be found within 5 - 15 minutes walking distance of the site, as set out in our Written Statement.



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On this basis, the site provides a sustainable location for new development and has been considered alongside a number of reasonable alternatives. The allocation of Vineyards for approximately 15 new homes provides the most sustainable option and can deliver sustainable development that offers a genuine choice of transport modes between the site and day-to-day services and facilities including the local shop and primary school. Our detailed response to your question is set out in the Written Statement attached.

Lewis & Co Planning would welcome the opportunity to attend the public hearing and discuss this matter in further detail, and any supplementary questions you might have. Should you require any additional information please contact Joseph Pearson on 01273 413700.

Yours faithfully,

Lewis & Co Planning
Joseph.pearson@lewisplanning.co.uk

Enclosed: Written Statement
 Route Maps

Written Statement – Question 2

Vineyards has been identified as an appropriate location for new housing development as part of the Neighbourhood Planning process. The previous examination concluded that Old London Road was not a sustainable location for residential development, largely due to conflict with national policies and specifically paragraph 38 of the 2012 National Planning Policy Framework, which states:

“38. For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.”

As you will be aware, this version of the National Planning Policy Framework (NPPF) has now been superseded by a revised NPPF (July 2018). The paragraphs within the revised 2018 National Planning Policy Framework that most closely relate to this superseded paragraph can be found within Section 9 of the document but make no reference to walking distances from ‘larger-scale’ developments to services, simply promoting *“locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”* (paragraph 103).

The Sustainability Appraisal (SA) accompanying the Plan weighs the sustainability impacts and appropriately assesses all these considerations. It identifies that the site remains within 15 minutes walking distance of all key services within Washington village¹. Pedestrian access is via a subway underneath the A24 and therefore provides an appropriate and safe walking route to these services and this route is lit at night. In addition to this the nearest shop, the Village Larder, is just 520m north of the site (5-10 minutes walking distance) and describes itself as a fresh produce store and deli. The services identified within the NPPF (2012) are therefore available within 15 minutes walking distance of the site. The shop is open seven days a week² and stocks a wide range of everyday food items and we encourage the Examiner to visit as part of his site visits.

The location of the main built-up area of Washington village within the National Park raises significant concern about environmental sustainability impacts from any larger scale development within the settlement, and the SA notes the shortage of available development sites within the parish. However, the need for additional housing, including the potential for affordable housing, remains. Development of the Vineyards site would complement modern development adjacent at Lamorna Close within this existing residential enclave and would support the viability and sustainability of local facilities and services serving Washington village, including the school. There are therefore clear sustainability benefits from developing this site at the scale proposed and these have been appropriately assessed through the SA and found to outweigh the concerns of the previous Examiner.

The reasons for including this site, the mitigation measures required to overcome constraints and reasons for rejecting alternative sites are set out within the submitted Sustainability Appraisal. Very few available sites are located within Washington parish and, in addition to other environmental, landscape and heritage concerns that have been identified (that do not constrain the Vineyards site), most alternative sites would also not deliver housing at a scale that could deliver affordable housing. Paragraph 152 of the NPPF (2012, see also paragraph 32 of the 2018 NPPF) is clear that *“Significant adverse impacts on any of [the economic, social and environmental] dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued”*.

There are similarities between Vineyards and the rejected Lucking’s Yard site (also on Old London Road) and these are recognised in the Sustainability Appraisal site assessment, however the location of Lucking’s Yard makes pedestrian access difficult and would discourage sustainable modes of transport. Vineyards is surrounded by residential development and would provide a more appropriate location for new housing in sustainability and residential amenity terms. For these reasons, the requirements of paragraph 38 no longer exist (but are met in any case) and the SA provides a robust justification that the approach taken provides the most sustainable option for housing delivery.

¹ including the primary school, as well as the village hall, public house and playing fields

² Monday to Saturday 0900 – 17:30, Sunday 10:30 – 16:30