

## Storrington, Sullington and Washington Neighbourhood Plan 2018 - 2031

Hearing to take place on 20<sup>th</sup> September 2018

### Statement in response to Examiners Question 4:

*Does the 10-ha site at Longbury Hill meet the requirements set out in Paragraphs 76 and 77 of the 2012 NPPF for designation as Local Green Space, including whether it can be described as an extensive area of land?*

14<sup>th</sup> September 2018

## Preface

My name is Clare Bartlett and I am a Partner at Batcheller Monkhouse based in Pulborough, 5 miles to the west of Storrington. Batcheller Monkhouse is a multi-disciplinary firm of Planners, Surveyors and Estate Agents providing a range of land and property related services throughout the South East. I am a Chartered Town Planner with 20 years Planning experience with a specialist interest in Environmental Impact Assessments. I have been a Chartered member of the Royal Town Planning Institute since 2000. I became an Associate member of the Institute of Environmental Management and Assessment in 2000 and became a Practitioner member in 2016.

Since 2017 I have represented the Hanbury-Aggs Family - the sole owners of the land at Heath Common, Rock Road, Storrington also referred to as Longbury Hill. Previous to that the landowner's interests were represented by my planning colleagues at Batcheller Monkhouse in Tunbridge Wells in Kent since 2015.

The land proposed for designation as Local Green Space (LGS) as shown on Policies Map Inset 4 (Appendix A) comprises 37 acres (15ha).

The land is located on the edge of Storrington next to the current Built Up Area Boundary of Storrington. My client's land comprises a commercial Scots Pine plantation that has recently been partially felled, and an access and hardstanding related to the felling operations adjacent to Rock Road granted planning consent on 5<sup>th</sup> January 2018. The land is also subject to a Felling Licence. Photographs of the site are provided at Appendix B.

The remaining 5 hectares of the proposed Local Green Space area comprises four private residential properties and their gardens, namely High Trees, Rosebay, Eastwolds and Capel.

My client's land has been submitted for consideration as a housing site as part of Horsham District Council's Strategic Housing Land Availability Assessment in 2015, and the latest Strategic Housing and Economic Land Availability Assessment in July 2018. The land was also submitted for consideration for housing to the Neighbourhood Plan steering group in March 2015.

The landowner is also currently in discussions with Clarion Housing Group regarding its potential for a new publicly accessible community woodland park together with a mixture of new homes including affordable shared ownership and social rent. To achieve this Clarion would wish to work up the detailed proposals closely with the surrounding community and the local parishes to meet the local housing as well as community infrastructure needs. Clarion is a responsible social purpose organisation which would undertake all the necessary environmental surveys required for residential development.

My client became aware of the proposed designation of his land as LGS upon publication of the Pre-Submission (Regulation 14) Neighbourhood Plan in July 2017. The proposed designation was supported by a LGS Assessment (March 2017) prepared by the South Downs National Park Authority (SDNPA) which suggested the site was suitable for further assessment. The report incorrectly stated that the site lies within the settlement, rather than edge of settlement, and that the site is publicly accessible. A subsequent Addendum published in November 2017 confirmed that there is no public right of way into the site, and on that basis cannot be said to be demonstrably special for recreation or of local historical significance. The Addendum also concluded that the site is of limited wildlife value. Longbury Hill was considered to not fulfil the criteria for designation as LGS.

Washington Parish Council remained opposed to removing Longbury Hill as LGS and submitted their own report on the site entitled Local Green Spaces Addendum – Longbury Hill Wood (January 2018). The site continues to be proposed for designation as LGS within the Submission version of the Neighbourhood Plan.

The following statement sets out my professional opinion as to how Longbury Hill does not meet all criteria necessary for a Local Green Space (LGS) designation in the National Planning Policy Framework 2012 (NPPF).

## Statement

Paragraph 77 of the NPPF (Appendix C) makes clear that *“The Local Green Space designation will not be appropriate for most green areas or open space”*. Further in order to be so designated all of the criteria set out in that same paragraph must be met (*“The designation should only be used...”*). This was explicitly confirmed by the Examiner of the Alrewas NDP [Pg 26, see Appendix D]. The requirement that the criteria are met is also that they are met presently – not that there is an expectation or hope that they could be met at some point in the future [Thakeham NDP see Appendix E]. Turning to those criteria:

*“Where the green space is in reasonably close proximity to the community it serves”* – whilst geographically Longbury Hill is within reasonably close proximity to Storrington it is, given the land uses which make up the proposed LGS, not an area of land which ‘serves’ the community. Whilst public access is not a prerequisite of designation it is an important factor and in this case the designation which stretches to some 37 acres is entirely private (either in the form of the private commercial woodland or the private residential properties).

*“Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife”* – these examples are not a closed list, however no other features are raised in support of the designation:

*Beauty* – the Longbury Woods element of the proposed LGS is privately owned commercial woodland, principally the stock is the non-native species Scots Pine which is infested with an under-storey of invasive *Rhododendron*. As a commercial plantation subject to a felling licence the appearance of the site is subject to change [see also the Forestry Report at Appendix F]. The variable nature of the site’s appearance and the effect of commercial felling activities on the suggested beauty and tranquillity of the site means it fails the ‘demonstrably special’ test in this regard. The southern portion of the proposed LGS includes private residential properties with extensive gardens including an outdoor swimming pool, again it is difficult to envisage how this could satisfy a categorisation of being ‘beautiful’ [see also Thakeham NDP see Appendix E]

*Historic Significance* – the archaeological report [Appendix G] identifies no features of archaeological interest (including the suggested earth bank boundary). Further, the SDNP Addendum, even having taken the suggested historic links at face value, concluded *“it is difficult to discern how special this historical significance is to the local community when there is no formal public access to the site”*.

*Recreational Value* – Longbury Woods have no recreational value, it is entirely privately owned and there are no public rights of way. In this regard it is not demonstrably special to the local community.

*Tranquillity* – the site is not accessible and so whatever tranquillity it might offer (if any) from within the woods cannot be demonstrably special to the local community. Although periodic in nature the management of the woodland on a commercial basis equally could not be described as ‘tranquil’.

*Richness of wildlife* – the ecological report undertaken by the owners of Longbury Wood in support of a recent planning application on the site (Appendix H) supports the previous findings of the SDNP Addendum which concluded that the site *“will have limited wildlife value”*. There is no basis upon which to conclude otherwise.

*Where the green area concerned is local in character and is not an extensive tract of land*

*Local in character* – Longbury Woods does not fulfil this criteria, it consists principally of non-native Scots Pine and is managed on a commercial basis (including leaving areas of felled land) and which also is predominantly under-storied by invasive vegetation – simply put it is not local in character and nor are the commercial activities which take place upon it. Needless to say the residential built form to the south equally is not local in character. Notably there is no landscape assessment as part of the NDP evidence base which assesses the character of the Longbury Hill LGS site.

*And is not an extensive tract of land* – the proposed designation extends to some 37 acres, on any basis that is an ‘*extensive tract*’. Not only that but it encompasses different uses including commercial forestry and residential development a fact which only serves to demonstrate that the area identified is extensive in nature. There is no ‘threshold’ in terms of size which defines what would, or would not, fall to be considered as ‘extensive’. In this regard the conclusions of other Examinations of NPs are of assistance: (i) Sedlescombe NP – Street Farm being the size of *“several full size football pitches”* at 4.6ha was considered extensive [Appendix I], (ii) Alrewas NP – two sites of 2.5ha and 3.9ha considered to be extensive [Appendix D], (iii) Tatenhill NP – sites of 9.2ha and 4.3ha considered to be extensive [Appendix J], (iv) Oakley and Deane NP – 5ha considered to be extensive [Appendix K], Backwell NP two sites of 19ha and 32ha considered to be extensive [Appendix L], further a contention that areas could be larger in semi rural / rural areas was expressly rejected.

The proposed designation is plainly much larger (in some cases over 15 times larger) than proposed LGS designations elsewhere which themselves have been considered to be an *“extensive tract of land”*. Importantly there is no definable quality which is expressed to cover the entirety of the proposed designation (not least on account of the different land uses), that in itself points to the designation being ‘extensive’ before even considering its very significant size. The proposed designation does not fulfil this criteria and so cannot be considered to comply with national planning policy.

## Conclusion

The land at Longbury Hill does not meet the criteria required in order for designation as Local Green Space and indeed much of the evidence base provided by the QB demonstrates that it does not. Further, the evidence provided herein serves only to reinforce the conclusion that the proposed designation should be deleted from the NDP as it does not comply with national planning policy. Indeed much of the evidence base provided by the Qualifying Body (and importantly the independent professional advice of the SDNPA) demonstrates that it does not.