

Storrington, Sullington and Washington Neighbourhood Plan Examination – Position Statement in respect of Examiner’s Question 5 on behalf of Welbeck Strategic Land II LLP



1. Planning Potential has been invited to respond on behalf of Welbeck Strategic Land II LLP to the Examiner’s Question 5 relating to the Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) 2018-31. Question 5 states: *“does the land at Downsview Avenue meet the requirements set out in paragraphs 76 and 77 of the 2012 NPPF for designation as Local Green Space”*. This statement should be read alongside our previous representations.
2. Paragraph 76 requires the identification of Local Green Spaces (LGS) to be consistent with the local planning of sustainable development and complementing investment in sufficient homes, jobs and other essential services. It also states that once a LGS is designated, local communities will be able to rule out development other than in very special circumstances. Paragraph 78 of the NPPF attributes LGSs the same level of protection as Green Belt. We are concerned that the proposed LGS designation is being used within the Neighbourhood Plan as a preventative mechanism against development.
3. Paragraph 76 requires LGS designations to be capable of enduring beyond the plan period. Therefore, the LGS designation must not prejudice Horsham District Council’s flexibility to respond to changing circumstances and meet other future sustainable development objectives, including housing delivery. It is relevant that the proposed quantum of housing to be delivered through the Neighbourhood Plan (194 dwellings) is only 21.7% of the Neighbourhood Plan Area’s Objectively Assessed Need (OAN). Further, the 194-unit contribution is a reduction from the 229 units proposed previously under the Pre-Submission Draft SSWNP, and we consider it a failure of the Plan to re-provide these ‘lost’ unit numbers elsewhere. Given the low proportion of local OAN that the SSWNP plans to meet, the proposed LGS designation would diminish the ability for the site to contribute towards sustainable development, and its designation has greater significance / implications than being complementary to other local investment. Our previous representations set out the sustainable development credentials of the site, abutting the existing Built-Up Area Boundary and bordered by existing housing. It is a logical extension to Storrington that would be prohibited in perpetuity if it were to be designated as LGS.
3. Paragraph 77 states that the LGS designation would not be appropriate for most green areas or open space. The designation should only be applied where the stringent tests are passed, because it is then afforded the same level of protection as Green Belt. It therefore stands that a robust evidence base must be provided to substantiate a proposed designation. We submit that the evidence base set out in the South Downs National Park Authority Local Green Spaces Report and Addendum (March and November 2017 respectively) fails to meet all the requirements of paragraph 77, which lists three bullet points that must all be satisfied for an LGS designation to be applied.
4. It is accepted that the site satisfies bullet 1. Bullet 2 requires a site to be *“demonstrably special to a local community and hold a particular local significance”*. There are two strands within bullet 2 to be satisfied, and it should not be assumed that a site automatically satisfies both together. In this case, the site assessment considers the site to be of *“low quality but high value...and has local importance as other alternative recreation spaces are over 300m walking distance away”*; however, there is insufficient justification as to why the site is *“demonstrably special”*; nor is the extent of the *“local community”* using it explored in any detail.
5. The site assessment considers that the site is only demonstrably special because of its recreational value. Without this recreational value, the site would fail the LGS test. In this regard, the site only provides limited amenity via a Public Right of Way along the western boundary, which is protected under separate legislation irrespective of whether the site is an LGS or not. The remainder of the site is fenced off and not publicly accessible. Notwithstanding its restricted access, the site contains no physical recreation and play facilities to extend its recreational offer, and therefore compares unfavourably to other sites which are considered to have a demonstrably special recreational value nearby, such as Storrington Recreation Ground and Sullington Recreation Ground.
6. Bullet 3 also has two strands: the green area must be local in character and is not an extensive tract of land. The site assessment does not consider whether the site is local in character. We submit that it is an unremarkable field which has no features of local distinction. It is just a piece of land adjacent to the Built-Up Area Boundary. It is agreed that the site is not an extensive tract of land.
7. As a general observation, the 21 LGSs proposed within a relatively small area undermines the ability for all to be *“demonstrably special”*. Further, by proposing to afford all of these sites the same level of protection as Green Belt, the approach of the SSWNP effectively eliminates these sites from assisting with other sustainable development objectives in perpetuity, resulting in a Neighbourhood Plan that is inflexible.