

STORRINGTON & SULLINGTON PARISH COUNCIL
THE PARISH HALL, THAKEHAM ROAD, STORRINGTON, WEST SUSSEX, RH20 3PP
www.storrington-pc.gov.uk
Telephone: 01903 746547 e-mail: office@storrington-pc.gov.uk
Clerk: Mrs Tracey Euesden

Dr Chris Lyons
Director of Planning, Economic Development & Property
Horsham District Council
Parkside
Chart Way
Horsham, West Sussex, RH12 1RL

23rd February 2017

Dear Dr Lyons,

DC/16/2108 – Glebe Surgery, Monastery Lane, Storrington

Proposed demolition of the existing Glebe Surgery, and erection of a new 1,400 sqm doctors surgery and 120 sqm new pharmacy served by 59 associated car parking spaces and the erection of 9 No. dwellings served by 31 parking spaces; all accessed by adapted access to Monastery Lane and the creation of new public green open space.

Whilst members fully support extended medical facilities, the Parish Council continues to register its **STRONG OBJECTION** to the above revised application on the following grounds:

Firstly, this Parish Council believes that with a 60% reduction in the number of houses proposed, this represents a more than significant change to the original application and that it should be considered as a new application and not an amendment.

That said, members do not consider that the reduction in the number of houses proposed has addressed any of our previous objections.

In addition, the type of houses proposed is not in line with the emerging Neighbourhood Plan, which requires a predominance of smaller houses, not larger ‘executive’ type houses. The Design and Access Statement incorrectly states that the proposal includes an element of affordable housing – it does not.

We believe that the fact that that is no affordable housing contravenes the recent ruling that found that "Developments of 10 units or 1000 sq m or less (including annexes and extensions) would be *excluded* from affordable housing levies and tariff based contributions". This development, according to the plans, exceeds 1000 metres by approximately 50%.

This proposal is now described as a ‘facilitating’ development, to provide the local community with a new doctors’ surgery through the delivery of new housing, housing that is neither needed nor of the size required, as indicated in the Parish’s Housing Needs Survey. Horsham District Council is happy that sufficient numbers of houses are coming forward through Neighbourhood Plans and has stated that it is satisfied with the numbers included in the emerging Storrington, Sullington & Washington Neighbourhood Plan. There is therefore **no overriding need** for the houses proposed in this application. The proposal does not qualify as “enabling development” as there is no “significant building” to be protected.

It is also noted that the road to the south east of the proposed development has been left as a hammerhead, leaving access to the remainder of the site, presumably for further development at a later date. Should this application be approved, this would set a dangerous precedent for the remainder of the field.

In response to the previous application, HDC’s Strategic Planning Department said, on 23.9.2016: *“The proposed housing is not enabling development for the medical centre as the medical centre would be financed by a grant from the NHS”*. This has not changed. The only thing that this application facilitates is profit for the diocese. This is evidenced by the statement on page 35 of the D&A statement *“...the Diocese have kindly offered to release the land required for the new doctors surgery for a nominal fee. However, this gesture is on the basis that new housing is to be delivered on site”*. This is a cynical attempt by the diocese to obtain development that it has tried and failed to obtain in the past, by using the need for extended medical facilities to its own advantage. It is entirely possible for the diocese to sell a piece of land for a surgery without building houses.

The proposed location is a greenfield site, which is allocated as a Local Green Space in the emerging Storrington & Sullington and Washington Neighbourhood Plan. It has now been confirmed by the recent report produced by the SDNPA, at the request of HDC, for the Neighbourhood Plan that the field fulfils all of the criteria for classification as a Local Green Space.

The site was submitted for consideration under the call for sites process but was excluded due to its unsuitability. It is also considered undevelopable in the recent SHELAA and was not put forward in the HDPF.

The density of the proposed new development is out of keeping with its surroundings and the loss of amenity for neighbouring houses and for the wider village would be considerable.

Access to the site is via a single-track lane, which leads directly on to a mini-roundabout with limited sightlines and where the exit cannot be seen by traffic coming from the right. This mini-roundabout is located in one of the most polluted parts of the Air Quality Management Area and the increased traffic movements resulting from the proposed houses will be exacerbated by health centre patients and staff, repeat prescription pickups, deliveries to the proposed pharmacy and trade deliveries to the homes, not to mention construction traffic. As such the proposal fails to comply with Policy 24 of the HDPF, which requires development to:

“Ensure that developments do not conflict with but contribute to the implementation of local Air Quality Action Plans;”

and

“... do not increase the number of people exposed to poor air quality”

Allowing 9 houses to be built in one of the most polluted parts of Storrington, not to mention people visiting the doctors' surgery and/or the pharmacy, would breach this policy.

The Parish Council considers that the traffic study provided with the application is inadequate and requests that WSCC Highways fully assess the implications of this proposal upon this already congested area.

The Glebe field is one of only 2 green spaces left within the built-up area of Storrington and the eco-system within the field, including trees, grasses, wildflowers, birds, bats and butterflies helps keep the ecology of the area stable and forms part of a bio-diverse corridor that should be protected.

It should also be noted that HDC's Conservation Officer on 5.12.16, in response to the previous proposal, stated: "*The LPA considers the Glebe land to be a **non-designated heritage asset***".

"The development would have an adverse impact on the undulating topography (the surgery car park would cut into the land.....)."

There do not appear to be any changes to the surgery proposed therefore this has not been addressed, and:

"...the Glebe land positively contributes to the rural sense of place and provides an important visual transition between the built up form within the settlement cores to the looser grained development and the countryside beyond".

This amended proposal does not address any of these issues. If the LPA considers the site to be a "**non-designated heritage asset**" then it has a duty to protect that asset under Policy 33 of the HDPF.

This amended proposal continues to impact greatly upon the Listed Building immediately adjacent to the site (Ladye Place) and also the Listed Building of St Mary's church, in breach of Policy 33 of the HDPF, which states:

".... Heritage assets are an irreplaceable resource."

The Policy requires development to:

*"Retain and improve the setting of heritage assets, **including views, trees and landscape features, including historic public realm features.**"*

This application would breach this policy, as it would effectively destroy the setting of and views to and from Ladye Place, a Grade II Listed Building and St Mary's church.

In the D&A Statement there is mention of "*significant landscape buffer between the proposed development and Ladye Place...*"

The Conservation Officer stated previously: "*... the landscape buffer area proposed by the applicants in order to provide a level of screening between Ladye Place and the development would in its own right adversely alter the character of the Glebe land; the Glebe is an undeveloped, open piece of land which is not planted with trees and hedging and the proposed introduction of planting to act as a screen would appear at odds with the character and appearance of the historic Glebe*".

The development still adversely affects Ladye Place, being directly adjacent to it, protected only by screening deemed to be unacceptable and temporary in December 2016.

The applicants make much of being able to screen the Listed Building. However, in the Appeal against development at Melton Drive, where the Grade II* Listed Building West Wantley House was some 90 metres from the appeal site, the Inspector stated, in relation to the appellant's reliance on screening: "*I find such reliance to pay insufficient regard to advice in the EHSR to the effect that **screening may only mitigate negative impacts**, rather than remove them and should never be a substitute for well-designed development within a heritage asset's setting. ... planting is, by its very nature, a temporary measure **and cannot be relied upon as a means of permanent visual mitigation**".*

The proposal cannot therefore be deemed not to be harmful to the Listed Building.

The proposed new pharmacy would be in direct competition with the two existing in the High Street. This would inevitably lead to the closure of one if not both existing pharmacies, thus reducing footfall to the village centre, which would adversely impact upon the local economy. It would also encourage further traffic along the High Street, through the AQMA, from people forced to go to that pharmacy not only for prescriptions but also for everyday pharmacy items.

The proposed new surgery does not provide a future-proof service to the community beyond 5 years and a longer-term solution to the provision of health care is required. The Planning Application does not make provision for further expansion to the medical centre and therefore the building could be rendered unsuitable for the needs of the community by 2020 and the threat to medical services in the community would return.

Whilst members recognise the need for a larger surgery, it cannot be guaranteed through enabling development, (as proven at the Wickhurst Green development in Broadbridge Heath), nor is it in the correct location, and as such members **strongly object** to the proposals.

Yours sincerely

Tracey Euesden (Mrs)
Clerk of the Council