

ALBOURNE PARISH COUNCIL

To the Planning Department

This is a response to the Regulation 18 Consultation on the MSDC Draft District Plan for 2021-2039 on behalf of Albourne Parish Council, as a statutory consultee representing the residents who are most directly affected by the proposed development DPSC2, which is called "Sayers Village" or "Land South of Reeds Lane", but which is, in fact, wholly located in Albourne Parish. At present Albourne Parish contains 715 residents and includes the village of Albourne which is a Category 3 "Medium Village" already committed to expand with the development of a Retirement home. It is adjacent to Sayers Common which is also a Category 3 village. The addition of up to 7,000 residents at Sayers Village in the Parish of Albourne is likely to expand this by nearly 10x which is clearly unsustainable and will fundamentally change the nature of the Parish as best evidenced by the fact that it will move Sayers Common to be a Category 2 "Larger Village" with a boundary a few hundred metres from the edge of Albourne. In this response we will differentiate between the two independent parcels of DPSC2 which comprise the main site (DPSC2/1) and the unconnected and separate site - also called Sayers Hamlet (DPSC2/2).

In responding to this consultation, we would start by highlighting the fact that, despite the fact that Albourne Parish is one of two of the most affected Parishes in the whole of Mid Sussex, MSDC did not (save for one meeting just before the Plan went out) satisfactorily engage with the Parish prior to the publication of the Reg 18 consultation, in order to hear our views; nor did it hold an event in Albourne Parish to present and explain the Plan to residents during the consultation. In both cases we believe that this reflects a real failure of MSDC to respect and understand the implications of what has been proposed in the plan, as is evidenced by the fact that there are significant errors in the Evidence Base provided, which have been highlighted by other respondents and risk compromising the consultation.

The Parish of Albourne sits in a key rural corridor that links the AoNB to the North with the South Downs National Park to the South, and comprises all the land to the west of the A23 to the boundary with Horsham District Council. As a result of development to the east of the A23 it is the last remaining rural link between north and south sitting directly under Devils Dyke in the South Downs National Park and so is a key element to the integrity of the rural nature of Mid Sussex. This is particularly relevant as for the last 10 years Mayfield Market Towns have been seeking to develop across this gap and to extend into Horsham District Council area towards Henfield. This development pattern has been actively opposed by all levels of the local community including the MP's; both Horsham and Mid Sussex District Council; a group of 21 Parish Councils collaborating as the InterParish Group; and residents co-ordinated by LAMBS, and their opposition continues to be the case.

Albourne Parish Council objects to the District Plan for a wide range of reasons which are outlined below but are based on two key points.

First, that the housing target of 1,119dpa established in the SHLA and the basis for this District Plan is wholly inappropriate and does not reflect the constraints of the District. It does not in any way reflect local need which is assessed in the Council's own evidence base as 622dpa and it does not have any level of local consent as delivery would fundamentally change the rural nature of Albourne Parish in breach of the Council's own expressed strategy. Given recent changes to the Levelling Up Bill the Council should not establish a plan that does not seek to make the fullest challenge to the Government assessed housing targets based on these constraints. The draft Plan includes 3 "Sustainable Communities" within its current plan with the understandable preference to concentrate development to achieve the 20 minute community concept and maximise infrastructure

effectiveness. DPSC2 requires more infrastructure and affects more rural nature than either of DPSC1 and DPSC3 so to the extent that there is any reduction in the housing requirement then DPSC2 should be removed from the plan first. DPSC2 delivers no infrastructure that is required by existing residents so the removal would not be a loss.

Second, that the development of site DPSC2, as part of meeting that Government housing target, continues to be wholly inappropriate. This site has previously been promoted as part of plans proposed by Mayfield Market Towns at the last District Plan Inspection and the wide range of objections to the site with supporting evidence were accepted by both MSDC and the Inspector Jonathon Blore. These remain valid and are hereby repeated in their entirety. If you do not have access to the details of these evidential statements which include Landscape and Visual Impact Assessments; Wildlife; Transport and Flooding studies then please let us know and we will be happy to assist you in securing them.

In addition, DPSC2 comprises two parcels of development that have significantly different issues and constraints and should be assessed independently. The Council's plan to link these by extending the proposed built-up boundary over land not currently included in the District Plan, and to encourage further development on land south of the B2116 to resolve this issue and establish further growth in "Sayers Village" is also totally inappropriate as it would consolidate the East-West spread of development across the whole of Mid Sussex, cutting the AoNB to the North from the SDNP to the South and continue the pattern of expansion and overdevelopment which would fundamentally change the rural nature of the Parish and District. In proposing DPSC2, MSDC should have also identified a "Green Circle" in DPN3 to ensure limitations are set on the boundaries of the site which is so visible from the SDNP; and not be encouraging creeping urbanization in such an area.

Our objection can be of no surprise to the Council as we are very proud of the fact that the Albourne Neighbourhood plan was one of the first to be completed and approved in 2016. This Plan has, and is, delivering the housing promised. DPSC2 totally ignores both the housing identified and also the policies adopted in that plan, particularly ALC2 (in relation to the SDNP) and ALC3, which defines the local strategic gaps needed to prevent coalescence with Sayers Common. It is our view that the boundaries of DPSC2 have been adopted on the basis of the land owned or controlled by the developer rather than with the proper consideration of the Albourne Neighbourhood Plan and the Council's own policy DPC2 on coalescence which states that "*When travelling between settlements people should have a sense that they have left one before arriving at the next*".

There are a number of other fundamental constraints that affect DPSC2 and make it unsuitable for allocation within the plan.

Road Traffic

Albourne already suffers significant traffic issues on the B2118 and B2116 for which a working group has been established to reflect concerns that local residents have about the increasing volume, speed and overall adverse impact of traffic on daily lives. A Traffic Regulation Order (TRO) has been submitted to WSCC Highways for speed limit reductions on the B2116, which would see that part of the road between The Street and the junction with the B2118 reduced to 20 mph, the section between the junctions with Truslers Hill and Twineham Lanes, a site of several serious road accidents, reduced to 30 mph and the remaining sections eastward from the Firland Estate reduced to 40 mph. These roads would be heavily loaded by DPSC2/2 development. The PC has been advised that TRO will be looked upon favourably when the WSCC's new speed limit policy for rural areas is approved. The Parish Council has secured the removal of several large road direction signs which are a legacy from the days when the B2118 was an A road and were synonymous with traffic speeds, which are no longer appropriate. The Parish Council has also installed village gateways and has purchased a moveable Speed Indication Device (SID) all in the interests of monitoring traffic and

encouraging lower and safer traffic speeds. At present, residents living on the London Road (B2118) complain that it can take them several minutes to be able to get onto the road; and pedestrians have difficulties crossing safely. Heavy traffic from the Firsland estate including waste lorries travel through Albourne on the B2116 and are causing damage to foundations of buildings. Finally, any traffic event on the A23 up to Hickstead can cause heavy traffic to be diverted through the village. There is not room for the B2116 to be widened in the village itself; and the proposed link road through the centre of DPSC2 which could act as a diversionary route would only ensure heavy traffic passes through the centre of a residential area, and would also create two additional junctions. The evidence base shows no modelling of any traffic on junctions relevant to Albourne Parish other than those with the A2300/A23 and we do not believe that the road network can be effectively expanded to cope, without creating severe congestion in already sensitive or high risk sites including the junction of Truslers Hill Lane and the A281; Hurstpierpoint High Street; Cowfold Air Quality Management area, and severely affecting residents and the rural nature of Twineham Lane; Wineham Lane and other approaches to the National Park. Finally, as a rural area, Albourne Parish is used for a wide range of leisure pursuits by many who live in the District and particularly cyclists and horse owners. Increasing the traffic on country roads would significantly increase the risk of accidents and reduce the recreational value of the area.

Public Transport

The existing bus provision is limited but could be expanded; however access to the rail network is extremely poor as Burgess Hill station is on the east side of the town; and access to Hassocks station is through Hurstpierpoint High Street and Stone Pound AQM and has no parking capacity. As a result, even community bus services will create road traffic issues and the suggestion that the cycle routes to Hassocks and Burgess Hill can be for anything other than recreational use is not reasonable.

Landscape

The Mid Sussex Landscape capacity survey by LUC (June 2014) clarified that the majority of Albourne Parish has low landscape capacity which is a fundamental planning constraint recognised in the DPSC2 Site Selection document, but ignored. We believe that this is also Grade 1-3a arable land which should not be developed under DPC1.

Flooding

In light of historic studies and local experience we are very surprised to see the Site Selection criteria rate the site flooding planning constraint as being minimal on the basis that there is no river-based flooding. The site is based on heavy Weald clay which suffers significant surface water flooding and causes run-off into watercourses which are tidal and create significant downstream impacts. Climate change has led to many more extreme events which have increased the regularity of flooding in lower areas near Cutlers Book and Sayers Common; and we anticipate that these will be exacerbated by the Northern Arc development despite flood mitigation plans. We believe that MSDC should seek to avoid development in this area unless it can be proven that all effects can be viably mitigated.

Waste Water Management

Despite being subject to planning management, recent developments in Albourne have caused the existing waste water system infrastructure to be overwhelmed with residents in Butts Cottages suffering sewage backflow, similar to the issues in Dunlop Close, Sayers Common. The fundamental waste water infrastructure does not have the capacity to accommodate any growth and the

proposed provision of a waste water plant in DPSC2 will not overcome this issue. All it can do is avoid exacerbating it.

Water supply

The Parish of Albourne adjoins the boundary with Horsham District which is currently prevented from undertaking any development unless it can demonstrate water neutrality due to issues with supply at Hardham. Whilst there are plans for a reservoir at Blackstone, these are not certain and it remains unclear exactly the source of water on the west side of the Parish. MSDC should avoid the risk of allocations where this matter remains unresolved, particularly in relation to DPSC2/2.

Finally, we note that MSDC promote the sites benefits as it provides infrastructure for the community including a 2FE Primary School and 4FE Secondary School; Health and other community facilities. MSDC is also clear that it has no authority to deliver this infrastructure. None of this is needed by the existing community, other than to support recent significant development at Sayers Common. In particular, Albourne CEP – which is now an Academy (under the Hurstpierpoint College Educational Trust) is short of full capacity and has the space to be able to develop further if needed. The plan identifies 93 new places all of which could be delivered by Albourne, which is within 20 minutes walk of all parts of DPSC2/1. Rather than assisting, the development of a new secondary school on the site would only exacerbate the traffic issues, particularly from Henfield to the east.

We hope that our views will be properly considered as MSDC develops its Reg 19 Plan for consideration by the Inspector; and look forward to fully supporting the Council in progressing a strategy that genuinely seeks to protect the rural nature of the District; recognizing its constraints and properly reflects the interests and consent of the local community.