

**Representations to Regulation 19  
(Submission Draft) Mid Sussex District  
Plan 2021 - 2039**

**Albourne Parish Council**

**February 2024**

## 1 - Introduction and context

1.1 - This document comprises Representations for and on behalf of Albourne Parish Council in response to the statutory public consultation in the Submission Draft (regulation 19) Mid Sussex District Plan 2021 - 2039 (the Submission Draft Plan)

1.2 - These Representations have been prepared following the statutory consultation on the Consultation Draft (regulation 18) Mid Sussex District Plan 2021 - 2039, and follow subsequent discussion and consideration by Parish Councillors at the meeting of (insert date).

1.3 - The scope and detail of the Representations reflects the limited resources and technical advice available to the Parish Council in responding comprehensively to a complex and detailed plan.

1.4 - The Representations are therefore focussed on key areas and strategic principles that the Parish Council submit make the Plan in its current Draft 'unsound.'

1.5 - The National Planning Guidance sets out and defines the the basis upon which the 'soundness' of a Plan is to be established and judged,

*a) Positively Prepared - Providing a strategy which as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other Authorities, so that unmet need for neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified - An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective - Deliverable over the Plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred as evidenced by the Statement of Common Ground; and*

*d) Consistent with National Policy - Enabling the delivery of sustainable development in accordance with the policies in this framework and other statements of national planning policy, where relevant.*

1.6 - The Parish Council's Representations focus concern on issues relating to a, b, & d and critically the basis for the objective assessment of local housing needs and the subsequent designation of key housing sites.

## **2 - Local Housing Need**

2.1 - Policy DPH1: Housing - States that the Local Housing Need (LHN) for the District over the Plan period is 19,620 dwellings at an average of 1,090 dwellings per annum. This calculation is based on the standard method which the LPA considers to be the appropriate and sufficient for the purposes of the Plan.

2.2 - Albourne Parish Council acknowledges that the LPA has followed the standard method formula to arrive at these figures based on the 2014 household projections based on a 10 year period (2021 - 31).

2.3 - In support of the Plan, the LPA further commissioned a Strategic Housing Market Assessment (SHMA) with a report published in 2021. The SHMA considers more recent sub-national demographic data by ONS (March 2020) which indicates a substantial reduction in population growth relative to the 2014 based figure.

2.4 - The SHMA projections indicate a need for far fewer new homes during the Plan period ( 19,199 down to 11,394), although it recommends adoption of LHN figures due to potential inward migration. Notwithstanding this, the discrepancy between the LHN figure and the demographic baseline assessment calls into serious question the 'soundness' of the LHN figures.

2.5 - The SHMA itself acknowledges the possibility that the level of net migration assumed may not materialise, whilst the most recent NPPF guidance states that use of the standard method should be an "advisory starting point" for the purposes of establishing the housing requirement for an area.

2.6 - This is a key acknowledgement that the standard method cannot always be relied upon to ensure an appropriate, sufficient or sustainable level of requirement and may need to be balanced by other relevant or more recent data.

2.7 - Albourne Parish Council recognises that the Plan has been formulated in the light of what was current NPPF advice, but points to the substantial level of discrepancy between SHMA and LHN demographic projections and the highly contingent speculation about the level of potential

inward migration, as indicating a lack of objectively assessed need in supporting the Plan's housing land allocation.

### **3 - Making effective use of land / growth at existing sustainable settlements.**

3.1 - One of the most fundamental requirements of the Plan must be to adhere to national policy in delivering sustainable development in accordance with the NPPF and other statements of national policy.

3.2 - Consistency with national policy is one of the four key requirements of 'soundness' and should be a guiding principle informing all strategic policies and allocations.

3.3 - Albourne Parish Council would submit that the Plan fails to adhere to national policy with respect to making effective use of brownfield land and maximising opportunities to focus growth at existing sustainable settlements.

3.4 - The Submission Draft Plan notes that Mid Sussex is a largely rural district with only 12% of its area within a designated built-up area boundary. It concludes that there is therefore relatively limited potential for brownfield development.

3.5 - Notwithstanding the limited potential, there is still a compelling obligation set out in NPPF paras 125, 128 & 129, to optimise these opportunities in order to deliver sustainable development, but also, in this instance, to safeguard the rural character of Mid Sussex and protect its natural assets.

3.6 - There is insufficient evidence that the LPA has set out to optimise the development of brownfield sites within the main urban centres of East Grinstead, Haywards Heath and Burgess Hill. The Plan requires modification following a proactive identification of brownfield sites, a comprehensive assessment of their potential and a plan to bring them forward for development including the facilitation of land assembly.

3.7 - The Submission Draft Plan also sets out a commitment to direct growth to existing sustainable settlements which are the three urban centres identified above.

3.8 - Although the Plan identifies some additional sites for residential development, figures for allocations for East Grinstead and Haywards Heath reflect what it asserts are limited opportunities for expansion compared to Burgess Hill.

3.9 - The Evidence Base reveals that additional sites at East Grinstead and Haywards Heath were promoted but subsequently discounted through the site assessment process. Indeed, the majority of sites promoted in these sustainable settlements were rejected, whilst large residential sites in more rural and clearly less sustainable locations were allocated.

3.10 - Albourne Parish Council submit that this is clearly in contravention of the Plan's stated aim to direct growth to existing sustainable settlements and contravenes NPPF policy and renders the Plan 'unsound' in this respect.

#### **4 - Land at Sayers Common / Policy DPSC3 ("Sayers Village")**

4.1 - Policy DPSC3 allocates land for 1,850 net additional dwellings, extra care provision, primary / secondary school, recreation space, library, health and community facilities at Sayers Common. In addition the Plan allocates sites to the north, south and south west of Sayers Common for an additional 544 dwellings (DPSC4, DPSC5, DPSC6 and DPSC7).

4.2 - These allocations are promoted in accordance with the Plan strategy to improve the sustainability of existing settlements where they are currently less sustainable. Albourne Parish Council questions the logic and compatibility of such an approach with NPPF objectives and the promotion of sustainable development.

4.3 - This strategy recognises that the identified locations (in this instance Sayers Common) are less sustainable than established sustainable settlements that should logically be the focus for more sustainable growth.

4.4 - Clearly large scale house building in and adjacent to less sustainable settlements does not guarantee their future sustainability and ensure compliance with the Plan's guiding commitment to "20 Minute Neighbourhoods." This can only be achieved through the provision of the necessary supporting infrastructure that does not currently exist in Sayers Common.

4.5 - The NPPF (chapter 3) states that strategic policies and allocations should set out an overall pattern, scale, design quality of places and make provision for among other things infrastructure.

4.6 - At present the promoter for development has only provided a high level vision document. This does not meet the requirements set out in Policy DPSC GEN which states that the site shall be developed in accordance with a Masterplan, Design Code, Infrastructure Delivery Plan and Phasing plan informed by a community engagement exercise, and that the Infrastructure Delivery Strategy that must demonstrate that infrastructure would be delivered in a timely and phased manner to meet community needs and mitigate the impact of development.

4.7 - Policy DPSC GEN explicitly recognises the critical importance of meaningful and inclusive community engagement in developing a deliverable masterplan, design code, infrastructure strategy and phasing plan for a sustainable development of this scale at this location. Without that engagement (that has not taken place) underpinning detailed plans, it is not clear how such a large allocation can be justified evidentially. (See appendix C - Statement by Cllr John Spencer)

4.8 - Without these plans, the growth strategy for Sayers Common lacks clarity and coherence and provides no assurances that the impact of massive and potentially hugely disruptive population growth will ensure the future sustainability of the settlement.

4.9 - Albourne Parish Council is concerned by the lack of detail with respect to the promotion of active and sustainable travel connections, or robustly evidence how the development will be delivered to improve connectivity between Sayers Common and neighbouring settlements including the nearest railway station at Burgess Hill.

4.10 - Albourne Parish Council is especially concerned about the traffic impact of development on this scale at Sayers Common (2,393 new dwellings) and the capacity of the existing road infrastructure to deal with this level of additional traffic. Data from Speed Indicator Devices (SDI's) placed within Sayers Common by the Parish Council report 2,621, 1741 and 1024 vehicle movements. (See Appendix A for data and SDI locations)

4.11 - Clearly without a commitment and allocated resource for major upgrade of local road infrastructure, the development will impact adversely on the local environment and further question the sustainability, connectivity and appropriateness of development of this scale at this location.

4.12 - There is insufficient evidence that policy DPSC3 will achieve its key objective to improve the sustainability of Sayers Common in terms of the timely and integrated delivery of key infrastructure and the promotion of sustainable transport connections and modes.

4.13 - Albourne Parish Council believes that the allocation of such a large number of new dwellings at Sayers Common, without a Masterplan that evidences and ensures delivery, conflicts with fundamental NPPF objectives, is not evidence-based nor justified and is therefore 'unsound.'

4.14 - NPPF states that in appropriate development in areas of flooding should be avoided and that strategic policies should be informed by a Strategic Flood Risk Assessment (SFRA). Plans should apply a sequential risk-based approach to the location of development taking into account all sources of flood risk and the current and future impacts of climate change.

4.15 - The Evidence Base supporting the Plan is Mid Sussex District Council SFRA dated June 2015. Notwithstanding the historical status his data, the SFRA acknowledges that "numerous records of historical flooding exist in and around Sayers Common predominantly due to poor surface water drainage systems," and also acknowledges that there are 50 properties in Sayers Common currently at risk from surface water flooding.

4.16 - Albourne Parish Council has commissioned Townsend Water Engineering Limited to prepare a Desktop Drainage and Flooding Investigation (Appendix B) to consider flooding and drainage issues in the locality and inform approaches and mitigations to ensure the development at Sayers Common does not exacerbate problems and risks to existing and future residents of the area.

4.17 - This report provides a level of local and up to date detail that is absent from the 2015 MSDC SFRA which itself recognises that Sayers Common is an area at risk from surface water flooding.

4.18 - Albourne Parish Council believes that the Townsend Report strongly reinforces the argument that a detailed and comprehensive consideration of the flood risk issues at Sayers Common should have been undertaken prior to the allocation of this land for development.

4.19 - Albourne Parish Council notes the the absence of any clearly defined boundary or limit within the DPSC3 allocation, and the potential for development within the southern periphery of the area to significantly erode the spatial separation between Sayers Common and Albourne.

We believe a landscape buffer is required at the southern edge of the site to prevent the coalescence of settlement between Sayers Common and Albourne and safeguard the integrity and setting of both settlements.

4.20 - In conclusion Albourne Parish Council believe there is insufficient evidence to support Policy DPSC3's allocation for a substantial residential development at Sayer's Common in terms of its sustainability, flood risk assessment and potential coalescence of settlement impact. Evidence relating to these matters should be available prior to adoption, and that the Policy is therefore not properly prepared, is not justified and conflicts with fundamental national planning policy objectives.

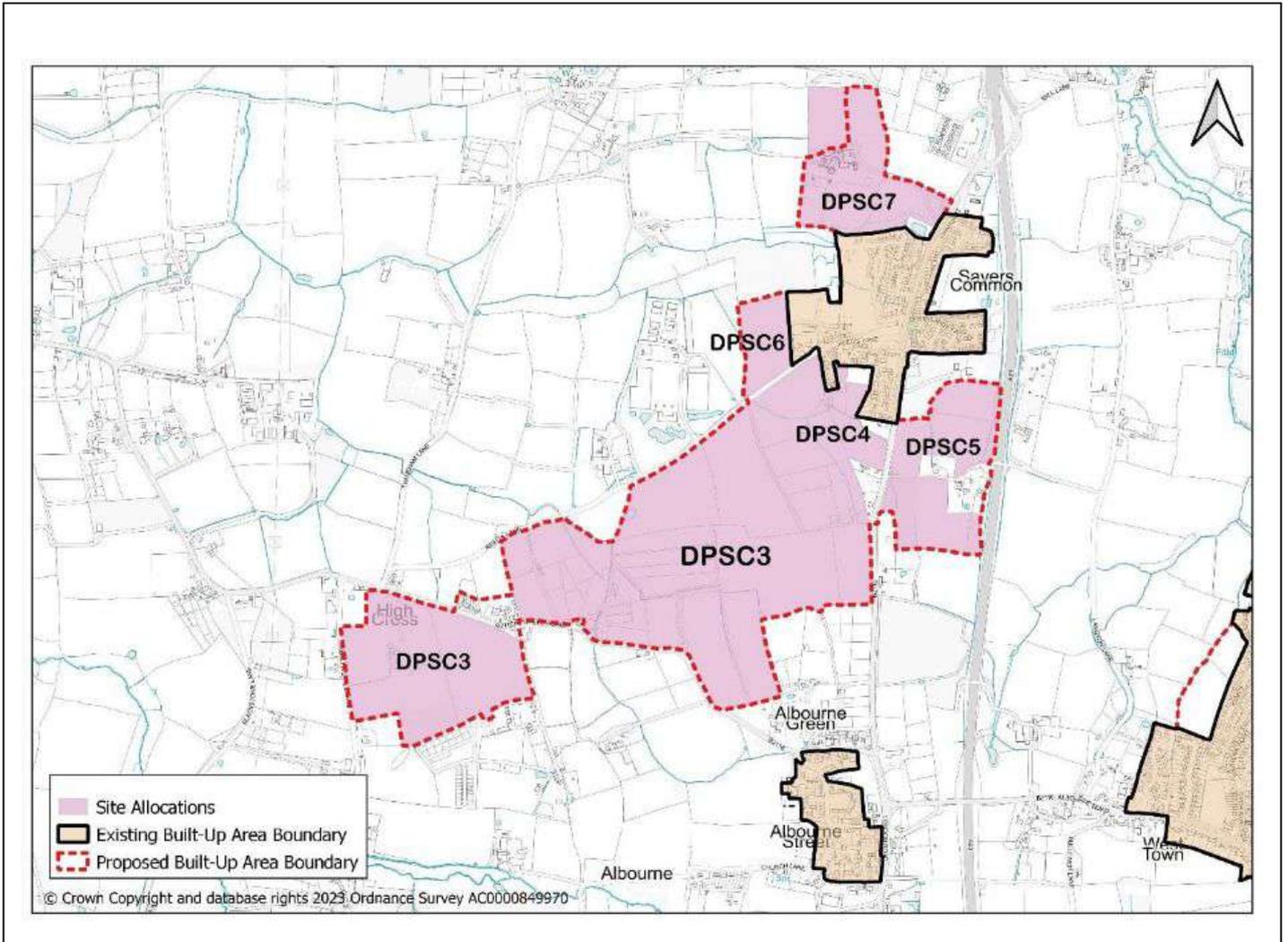
## **APPENDIX A - SID data and locations**

SID date in area of Proposed Sayers Village

Month	Year	Car Count	Pedestrians? Under 10 mph	Driving under speed limit (30mph)	Driving over speed limit (Average )	% speeding	Driving 10 mph over speed limit (Peak speed)	% over 10 Mph	Top Speed (mph)	Location	Per Day
November	2022	78634	50	56422	22212	28.2	2801	3.6	74.4	Sayers Common (SCVS)	2621
March	2023	53995	5	18678	35317	65.4	14934	27.7	72.9	<a href="#">Sayers Common South</a>	1741
November	2023	30735	13	16534	14201	46.2	3298	10.7	62.2	<a href="#">Reeds Lane</a>	1024



# **APPENDIX B - Desktop Drainage and Flooding Investigation**



# Desktop Drainage and Flooding Investigation for Albourne Village, West Sussex

Contract Ref: FD192

Councillor John Spencer at Albourne Parish Council

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## Quality Assurance Record

Contributors for Townsend Water Engineering Limited:

Name	Role
<b>Charles Townsend</b>	Project Manager
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Document Status and Revision History:

Version	Date	Author	Reviewer	Authoriser	Status / Comment
1	19/02/2024	A. Osborne	C. Townsend	C. Townsend	Final

### Limitation of Liability and Use

The work described in this report was undertaken for the party or parties stated; for the purpose or purposes stated; to the time and budget constraints stated. No liability is accepted for use by other parties or for other purposes, or unreasonably beyond the terms and parameters of its commission and its delivery to normal professional standards.

# 1. INTRODUCTION

## 1.1 Purpose of this Report

Townsend Water Engineering Ltd. has been appointed by Councillor John Spencer at Albourne Parish Council for a Desktop Drainage and Flooding Investigation for Albourne Village, West Sussex (Grid Ref: 526608, 116419). This report has been prepared to investigate drainage and flooding issues around Albourne and ensure that the proposed development of Sayers Village, that is proposed within the local plan, will not exacerbate drainage and flooding issues in Albourne, and raise awareness of drainage and flooding issues to the developer and planning inspector.

The report is based on the available drainage and flood risk information for the site detailed in Section 1.2 and prepared in accordance with the planning policy requirements set out in Section 1.3.

## 1.2 Sources of Information and Consultation

This Report has been informed by:

- Sayers Village plan;
- BGS website <http://mapapps.bgs.ac.uk/geologyofbritain/home.html?mode=boreholes>;
- Cranfield University Soil Mapping <http://www.landis.org.uk/soilscapes/>;
- The EA online flood maps;
- [Albourne Flood Map \(getthedata.com\)](#);
- Craddys Flood Risk Assessment and Drainage Strategy for LVS Hassocks, London Road, Sayers Common, August 2023;
- [Storm Ciarán lightning strike causes power cut and flooding at school in Hassocks | ITV News Meridian](#);
- Mid Sussex District Council Strategic Flood Risk Assessment Level 1 June 2015;
- Flood Zone Map <https://flood-map-for-planning.service.gov.uk/>;
- Flood Risk Map: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/>; and
- Albourne residents anecdotal feedback to the flyer campaign and the photo and video evidence that supports their claims.

## 1.3 Policy Context

This report has been prepared in accordance with the relevant national, regional and local planning policy and statutory guidance as follows:

- National policy contained within the National Planning Policy Framework (NPPF) dated Sept 2023, issued by former Ministry of Housing, Communities and Local Government with reference to Section 14 'Meeting the challenge of climate change, flooding and coastal change';
- The NPPF Planning Practice Guidance (PPG) released in March 2014 ('Flood Risk and Coastal Change' section) and updated in February 2016 to incorporate the EA 'Flood Risk Assessments: Climate Change Allowances' guidance; and
- [strategic-flood-risk-assessment.pdf \(midsussex.gov.uk\)](#).

## 1.4 Structure of this Report

The Report has been prepared based on the following structure:

- Section 2 refers to the sites background information;
- Section 3 presents the desktop assessment of existing flood risk at the site;
- Section 4 provides a summary of the assessments.

## 2. BACKGROUND INFORMATION

### 2.1 Location and Background

The location of the proposed development site is shown in Figure 1 and Figure 2, with location details found in Table 1. The site is located Albourne Village, West Sussex (Grid Ref: 526608, 116419).

Table 1: Site Details

Reference	Value
<b>OS X (Eastings)</b>	526608
<b>OS Y (Northings)</b>	116419
<b>Nearest Post Code</b>	BN6 9BJ
<b>Nat. Grid</b>	TQ266164

Grid reference details taken from the site <https://www.streetmap.co.uk/>

The proposed development, Sayers Village, will build over 2,000 houses on agricultural land between Sayers Common and Albourne, merging the two villages. The development is split into 5 sections, DPSC3, DPSC4, DPSC5, DPSC 6 and DPSC7. DPSC3 falls within Albourne Parish Council. The part of DPSC3 that falls within the Albourne parish boundary is approximately 87ha and is currently an agricultural area; a greenfield site. The River Adur is to the south-west, just entering the site. A tributary of the River Adur called Cutlers Brook runs through Albourne; Cutlers Brook is an ordinary watercourse.

The site is predominantly rural, with lots of agricultural fields and ponds. The parish council is shown in Figure 1 and figure 2. Sayers Village - the proposed development, is shown in : Figure 3.

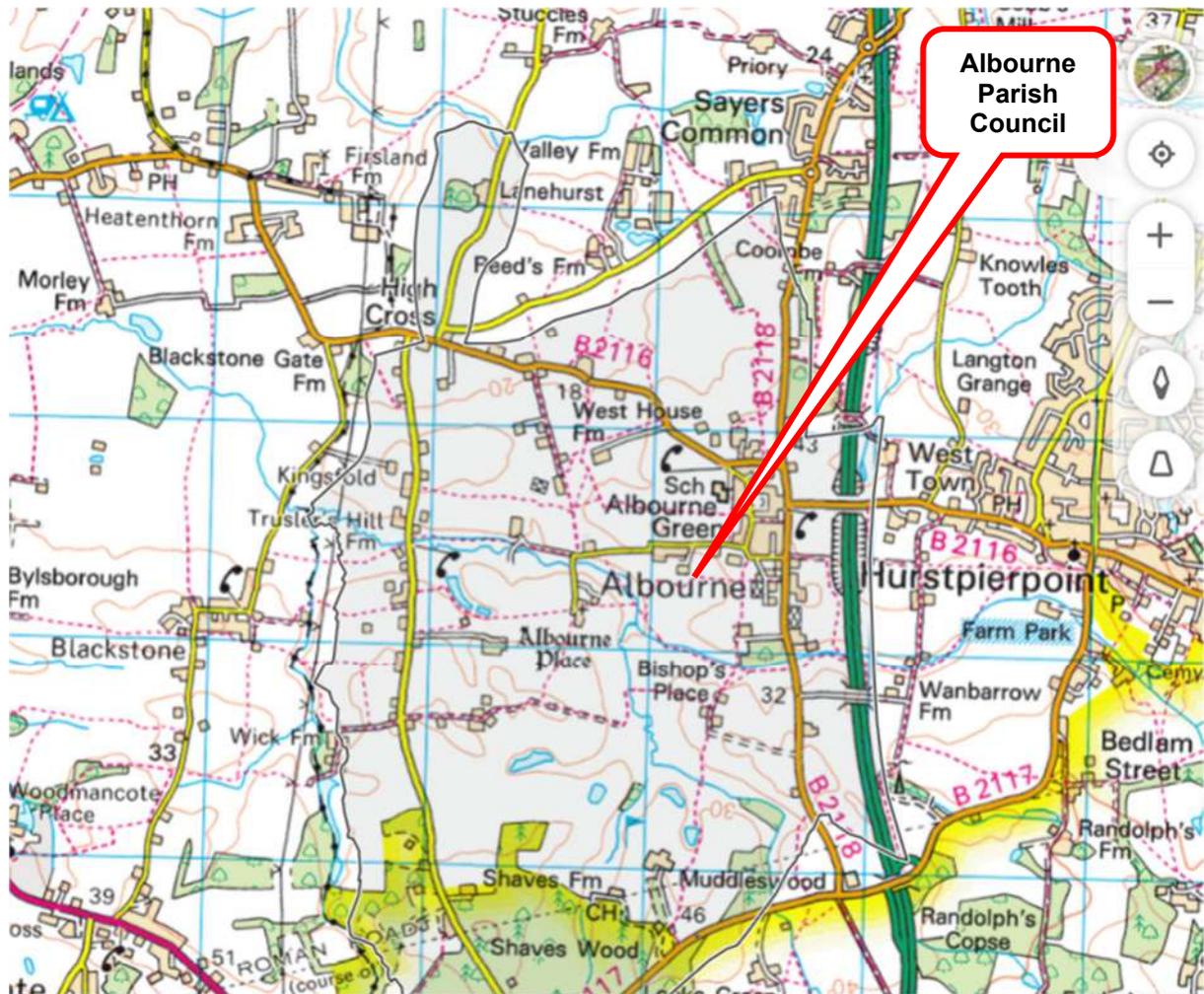


Figure 1: Site Location OS Map (Source: Bing)

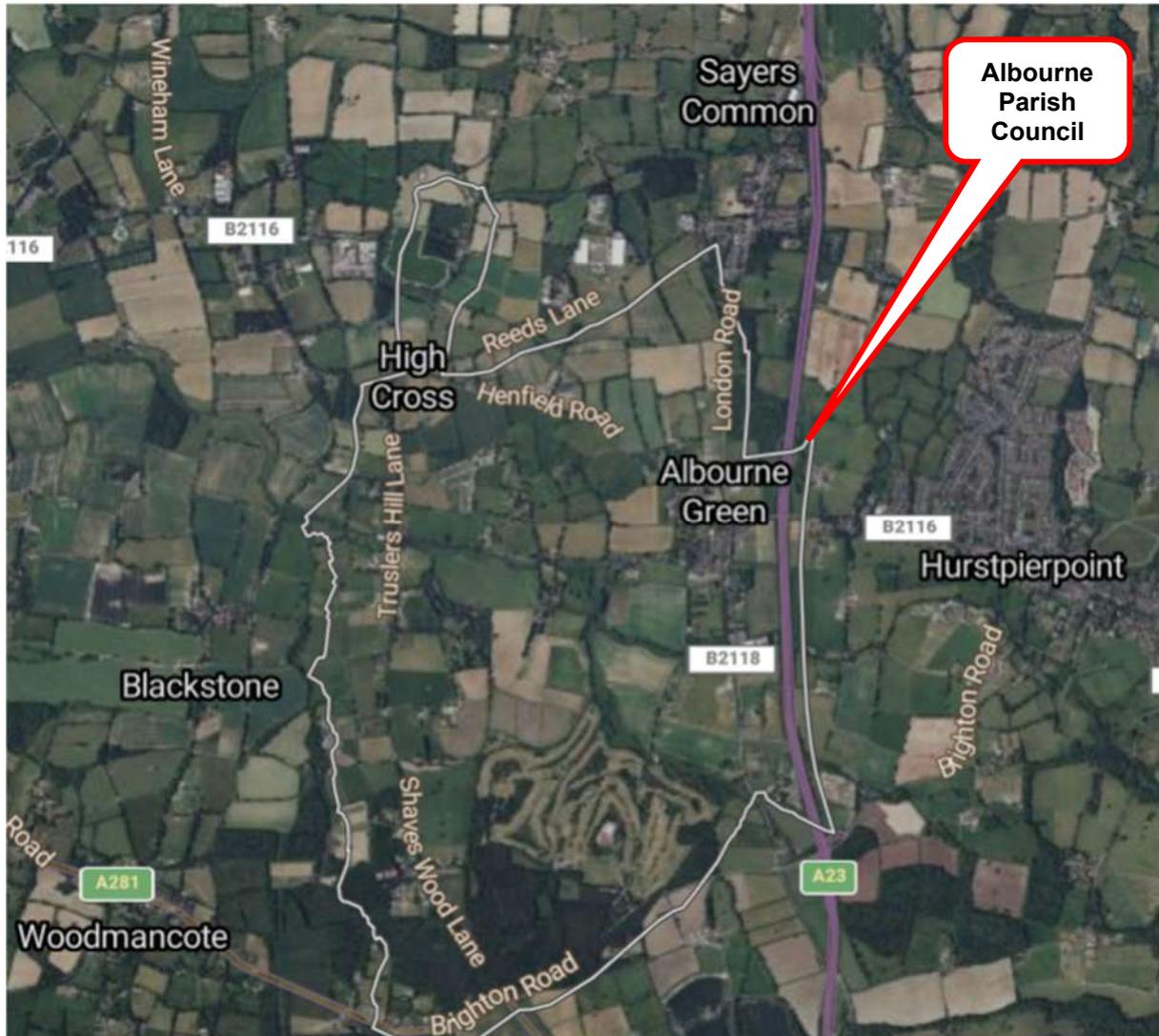
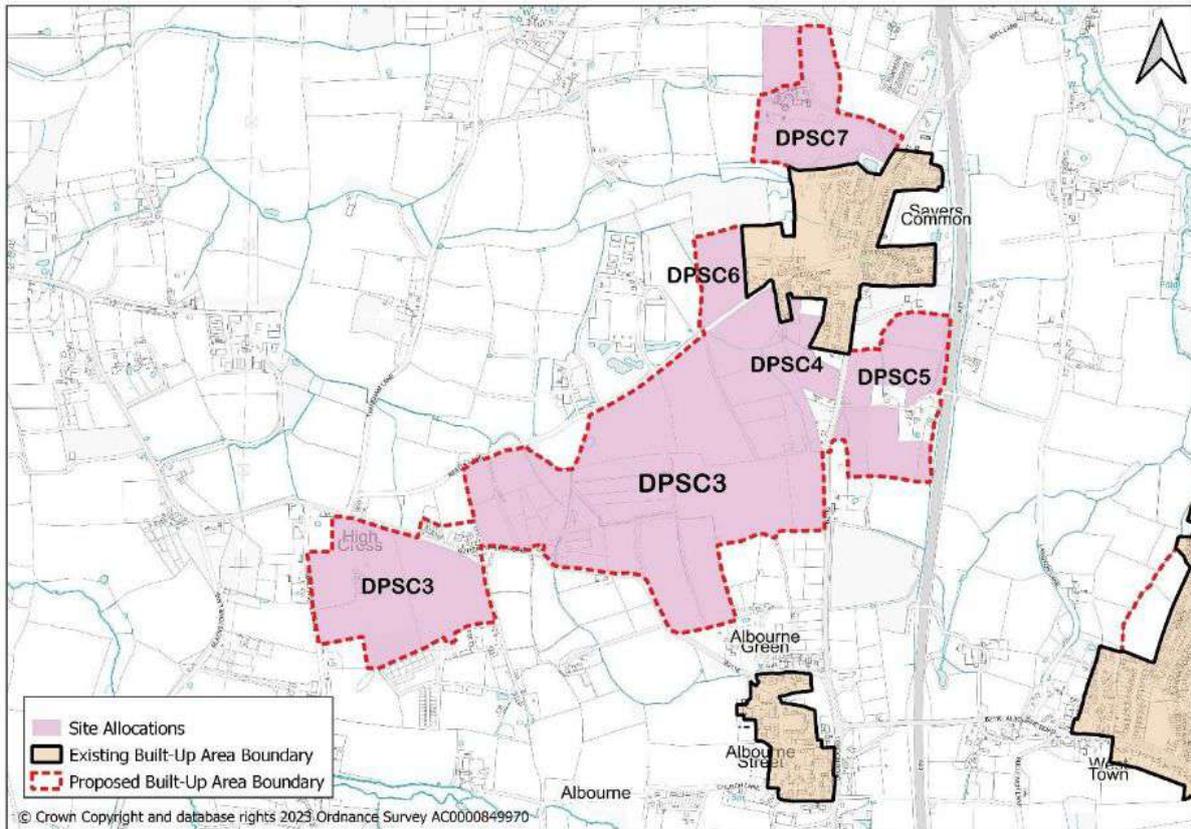


Figure 2: Aerial View of the site (Source: Bing Maps)



: Figure 3: Sayer Village Proposed Development Areas (DPSC3 Falls Within Albourne Parish Council)

## 2.2 Topography

The Village falls from north to south, with higher levels in the south of 46mAOD and 18mAOD in the north.

DPSC3 typically falls towards Cutlers Brook from North to South according to the OS maps.

## 2.3 Geology and Soil

The development Sayers Village has been split into 5 sections, DPSC3, DPSC4, DPSC5, DPSC 6 and DPSC7. DPSC3 falls within Albourne Village. The geology at the proposed development has been obtained from the *British Geological Survey (BGS)* website. The bedrock beneath all 5 sections is described as 'Weald Clay Formation - Mudstone. Sedimentary bedrock formed between 133.9 and 126.3 million years ago during the Cretaceous period'. Please see Figure 4.



Figure 4: Bedrock underneath the Site (Source: BGS Bedrock Geology Mapping)

Soilscapes Viewer describes the soil conditions at the development sites as 'Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' with impeded drainage. Please see Figure 4 below.

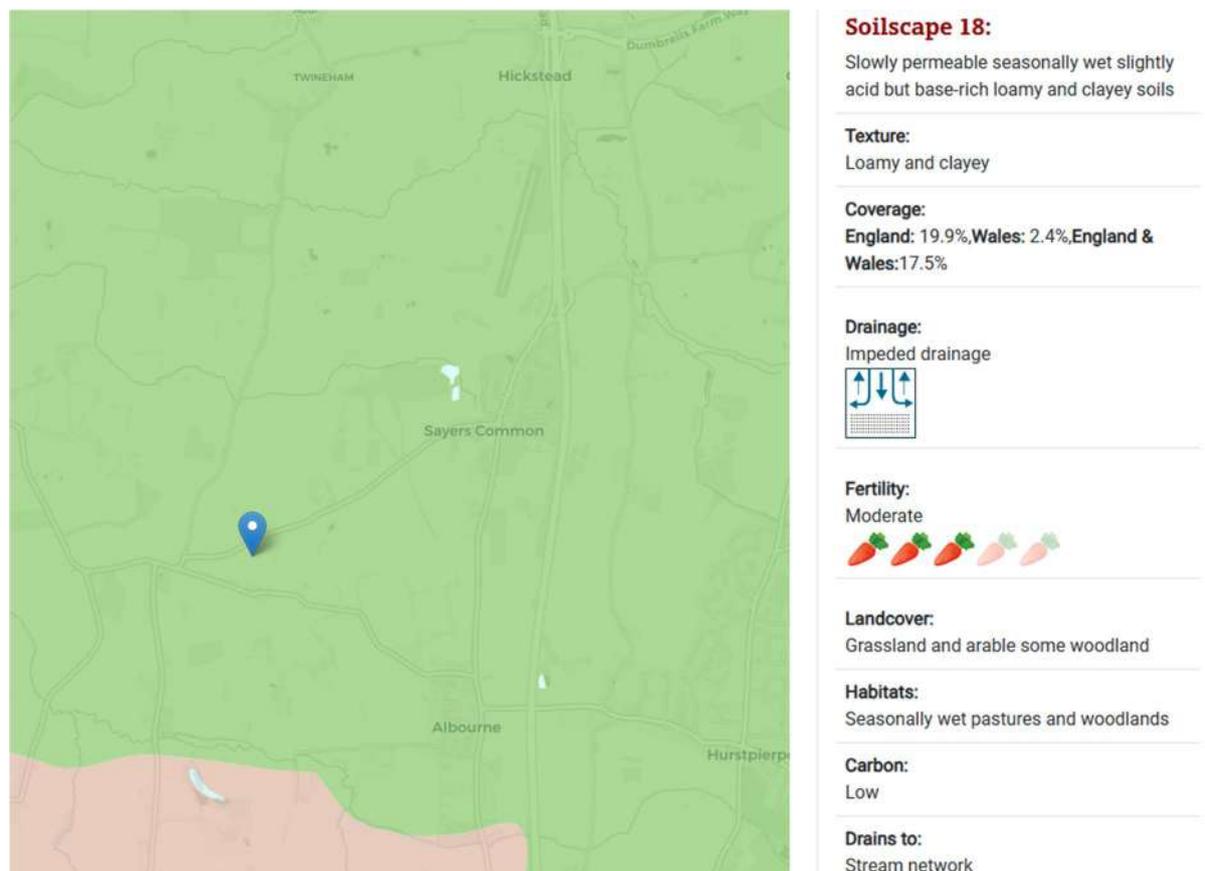


Figure 5: Soilscales

Based on these findings, it is believed that infiltration is unsuitable at these sites.

## 2.4 Flood Zone

Parts of Albourne Parish Council and Sayers Village are within Flood Zone 3 (an area at high risk of flooding). This means in any year land has a 1% or more chance of flooding from rivers. The areas at high risk of fluvial flooding follow the path of the River Adur and the tributary of the River Adur, Cutlers Brook. Please note, the flood maps are only accurate to river catchments over 3km<sup>2</sup>, if the river catchment is less than 3km<sup>2</sup>, the flood maps may not show flooding.

The proposed development Sayers Village is within Flood Zone 1. Locations in Flood Zone 1 have a low probability of flooding. This means in any year land has a less than 0.1% chance of flooding from rivers. Please see Figure 6:

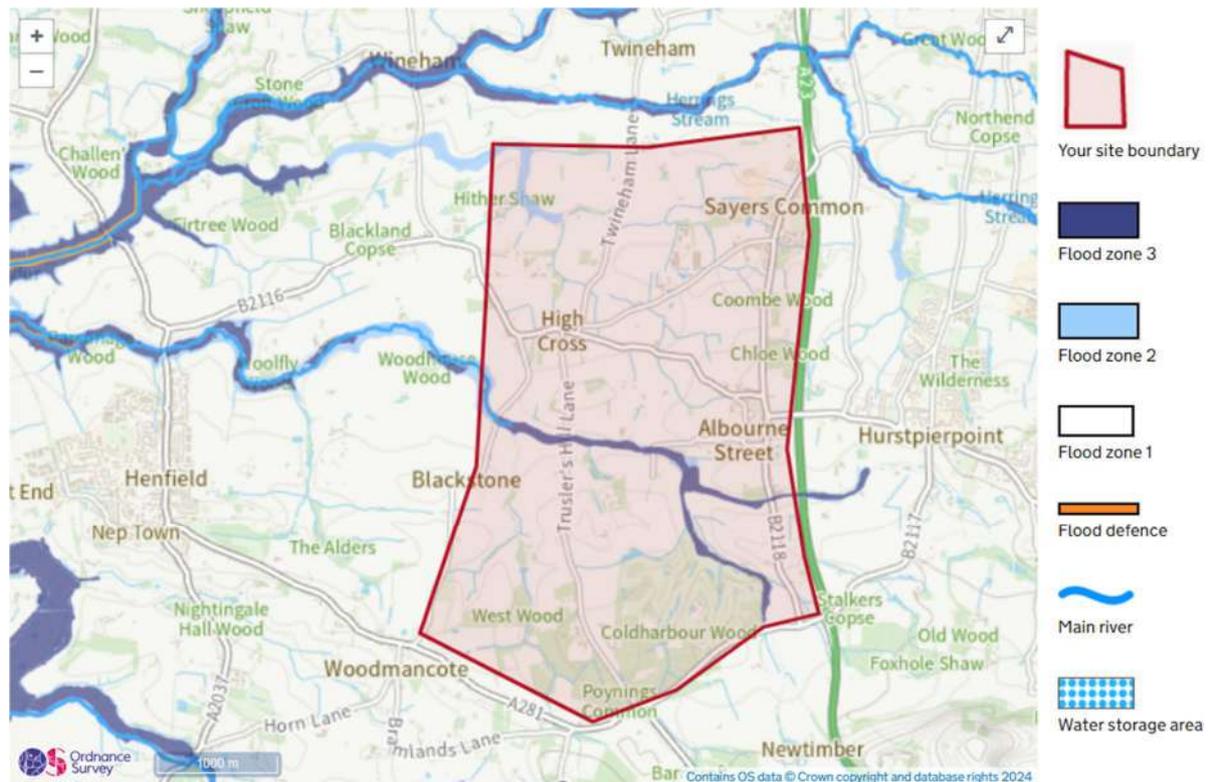


Figure 6: Environment Agency (EA) Flood Map

## 2.5 Climate Change Allowances

In May 2022, the Environment Agency updated the climate change (last updated 27 May 2022); this advice updates previous climate change allowances to support the NPPF (DCLG, 2021). The advice splits the country into regions and gives climate change split into central, high, upper. According to the guidance, the development should use 37% for river flows for more vulnerable development. Please see below the climate change map for river flow allowances:

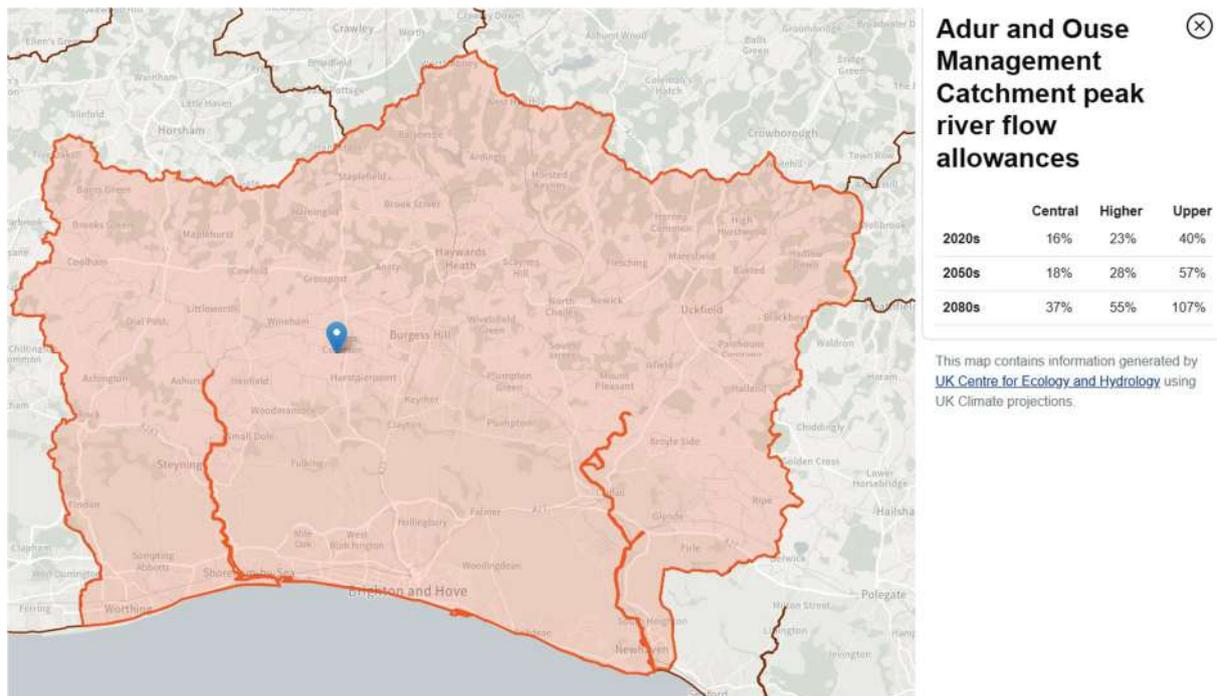


Figure 7: Peak River Flow Allowances

Figure 8 shows anticipated changes in small catchments, recommending a progressive increase, reaching 45% for the 'Upper' allowance by 2125. This allowance would be recommended for this proposed development, which is classified as 'More Vulnerable' and has been taken to have a 100-year design life. The 45% climate change allowance is based on the 90th percentile, meaning that there is a 90% chance that rainfall will not increase by more than the 45% increment.

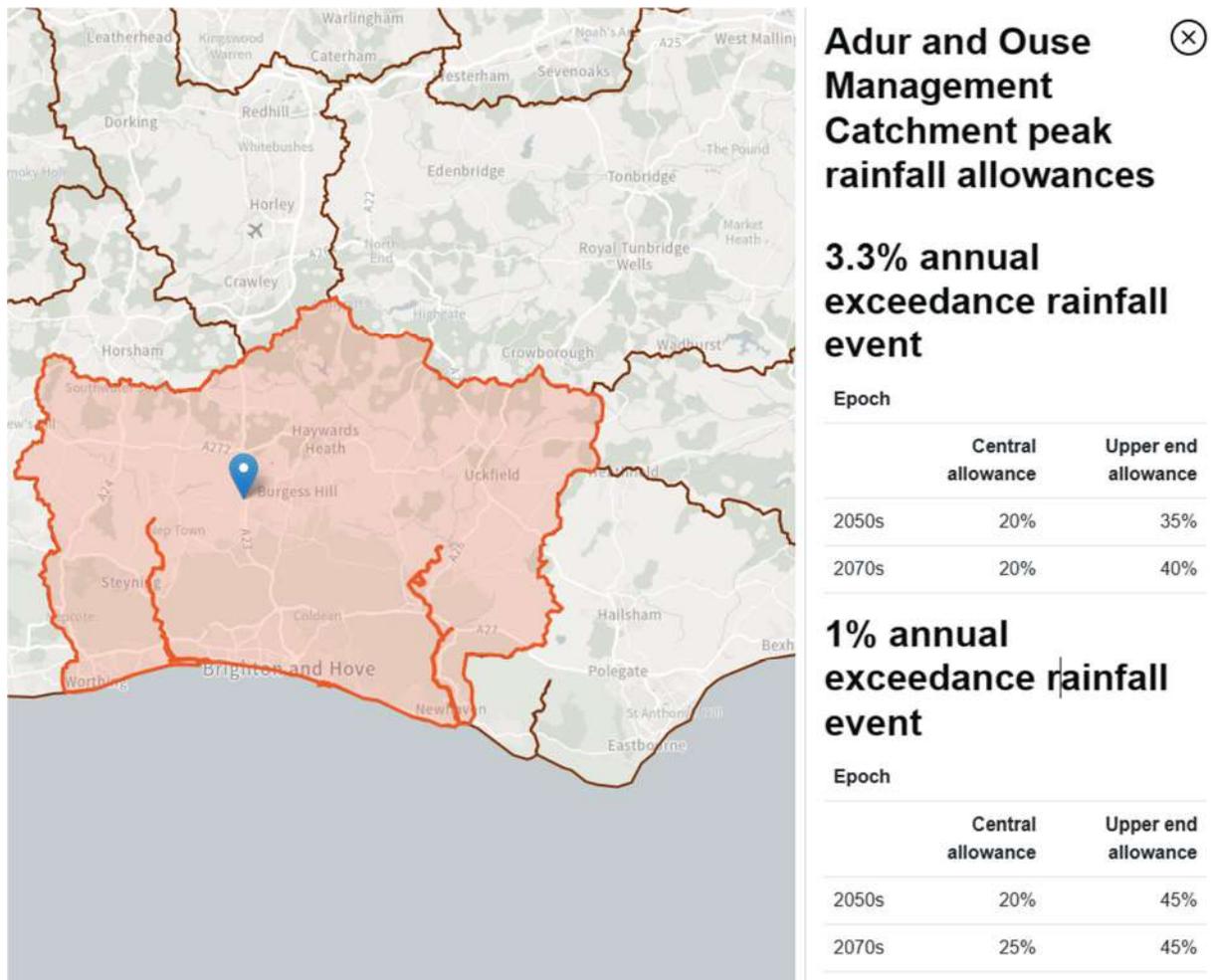


Figure 8: Peak Rainfall Intensity Allowances

**This will need to be reviewed before submission to planning, to check it is up to date. However we would expect climate change to be taken into account.**

### 3. FLOOD HAZARD FOR EXISTING SITE

#### 3.1 Source of Flood Risk

Flood sources and their possibilities at the site is listed in Table 2, and further described below.

Table 2: Sources of Flood Risk

Key sources of flooding	Possibility at Site
<b>Fluvial (Rivers) Defended / Undefended</b>	<i>High Flood Risk following the River Adur &amp; Culters Brook in Albourne - Flood Zone 3. Low Flood Risk in the proposed Sayers Village development – Flood Zone 1 (confirmed by EA product 4 data)</i>
<b>Tidal</b>	<i>N/A</i>
<b>Groundwater</b>	<i>Low risk according to SFRA. There is groundwater present in the parish, however, it is not a flood risk as the soil is clay and impermeable.</i>
<b>Sewers</b>	<i>Considered to be low, however, this will need to be reviewed upon receipt of the sewer maps</i>
<b>Surface water</b>	<i>Parts are high - the ground is clay, therefore, rainwater cannot drain through the ground, which leads to it pooling in fields. According to the flyer response, this then floods roads and homes around the B2116, Henfield Road, Reeds Lane, Truslers Hill Lane, Cutlers Brook, Twineham Lane, London Road, Meadow View, High Cross and Church Lane.</i>
<b>Reservoirs / canals and other artificial sources</b>	<i>Low</i>
<b>Infrastructure failure</b>	<i>No such occurred according to EA Product 4 data and the SFRA</i>

##### 3.1.1 Findings of the Flyer Campaign

Albourne Parish Council carried out a flyer campaign in Albourne in January 2024, distributing 600 flyers to homes in Albourne, asking residents for their anecdotal experience of flooding in the village. 7 replies were received, noting flooding in the B2116 Henfield Road - Inholmes Cottage, Oakvale Cottages and Welling Cottage, Reeds Lane, Truslers Hill Lane, High Cross, areas surrounding Cutlers Brook, Twineham Lane, London Road, Meadow Views and Church Lane. Due to data protections we prefer not to publish this data in this report, however if the interested parties i.e. the inspectors & Mid Sussex Council representatives wish to view it, we will seek approval to share the information.

Inholmes Cottage flooding 12 years ago and as recently as December 2023, when the fire brigade was called to pump water out of the cottage.

Residents in Henfield Road said the street, their homes and their gardens had flooded, as the drains in the area can't cope with rainfall events and there are no beneficial ditches in the area to hold the rainfall. They also noted that there is no street lighting in the road, so when the road floods, cars can't see the flooding adequately, so drive at speed through it, which causes a tidal wave of water to enter under residents door, effecting their electricals. One resident said that the drain outside their house was constantly blocked. The drains could potentially be blocked or collapsed. This should be looked into by the developer, as it falls within DPSC3. Furthermore, the flooding described above may suggest the ground is impermeable and that rainwater cannot flow through the ground, so sits in the fields. The proposed development will need to take careful consideration on overland flows and

Truslers Hill Lane by Cutlers Brook, which was noted to flood regularly, with cars being unable to pass through it. One resident remarked that the flooding made the roads dangerous. The same was said for Twineham Lane. This is not only during high rainfall, but also during moderate rainfall.

London Road has persistent flooding, this is discussed further in section 3.1.3.

A resident of Meadow View sent us pictures of their garden flooded, with the greenhouse flooded to waist height. The resident told us that during flood events, flood water would back up through their sinks and shower. They noted that during flood events, multiple exit roads were also flooded.

One resident noted that Church Lane floods.

Reeds Lane is mentioned in the responses, however, it is not clear where and why the flooding is happening. It is recommended this is investigated further at planning.

Please see a map of the locations where flooding occurs and the map of the proposed Sayers Village development below in Figure 9 & Figure 10. It can be seen that most flood incidents occur in the North of Albourne, in and around the Sayers Village proposed development. There is known historic flooding where DPCS3 is proposed to be built.

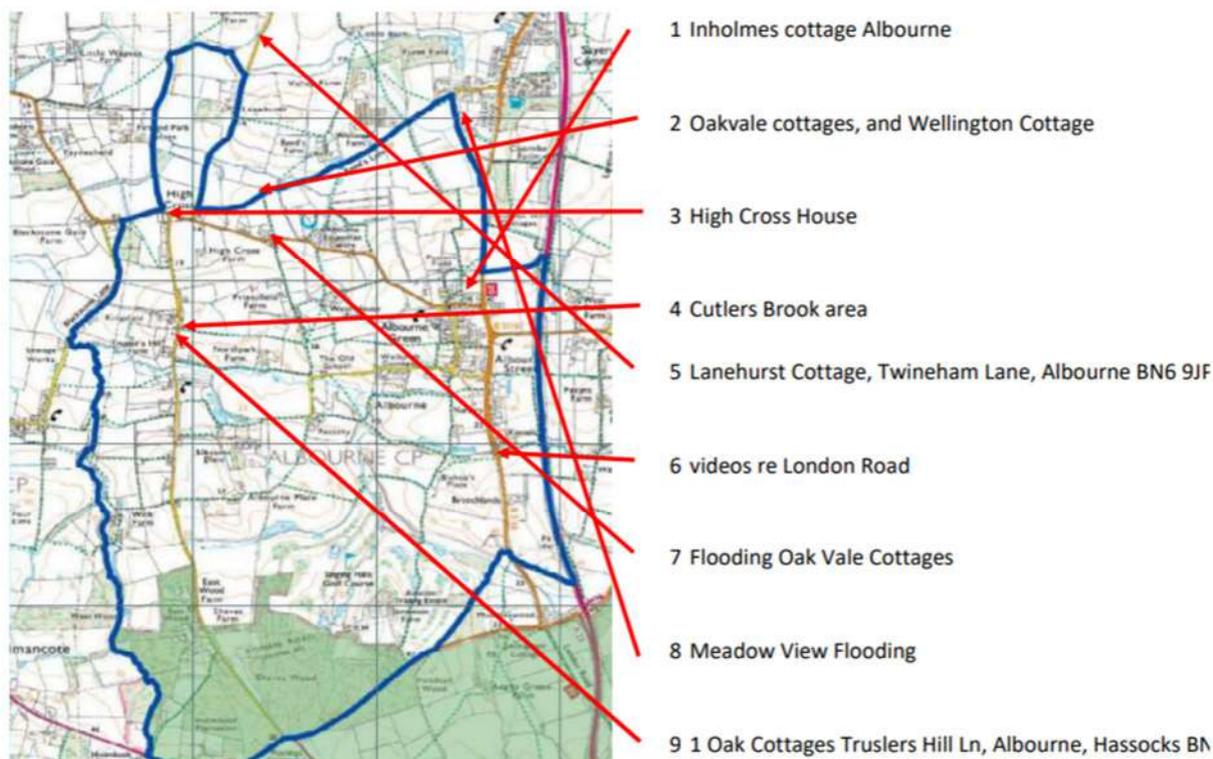


Figure 9: Locations of Flooding in Albourne

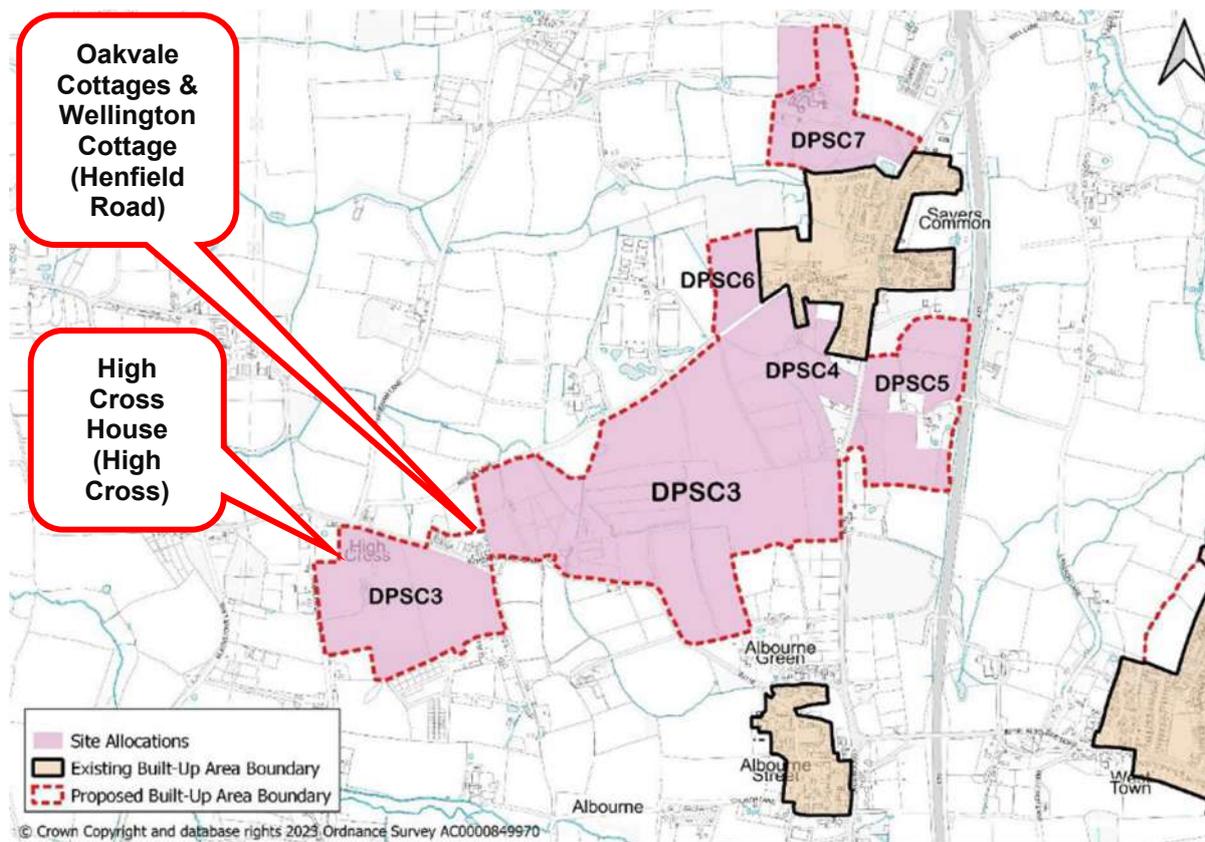


Figure 10: Proposed Development of Sayers Village

If the Sayers Village development is approved, careful consideration should be given to the construction of the new gardens, as the area is clay and it is evident that the existing houses in the area have issues with garden drainage and flooding. The clay soils in the parish mean that, when it rains, the rain cannot drain into the ground through the local fields, the consequence of this is the rainfall rolling off the fields and onto the local roads, gardens and houses.

The proposed development must not exacerbate the flooding in to the existing houses and third party land.

We would recommend that an overflow drainage investigation is undertaken of the development site at planning. The first scenario is understanding the existing situation, and then the second scenario is the proposed situation. Any flooding caused by the new development should be mitigated. Mitigation, firstly, not building in areas prone to flooding in flow routes. Then, the use of SuDS systems, maintaining and improving existing drainage ditches and drainage infrastructure of the area. Or new drainage in the ways of cut off ditches at the parameters. We would expect that the proposed development would mitigate the flooding that starts on their land and effects households and third party land.

### 3.1.2 Flood Risk from Cutlers Brook

As we can see in Figure 11, there is surface water flooding all around Cutlers Brook. Following the flyer campaign, multiple Albourne residents noted regular flooding surrounding the brook and Truslers Hill Lane, with photographic evidence of the flooding to support their claims. It can be seen that the roads flood to a level that makes vehicular passing difficult and dangerous, with vehicles driving in the middle of the road to pass. Flooding around the brook has also caused vehicular passing to be impossible, with vehicles turning around.

Again the proposed development must not increase flooding in this area. The likely way the proposed development will increase flooding is by the added surface water discharge increasing the existing flooding. We would recommend that the discharge rate is decreased from the existing rate, thereby ensuring less water enters Cutlers Brook and decreasing flooding to the houses around there.

We would recommend the discharge rate is decreased to the 1 in 1 year event from the proposed development or to 2l/s.

For the proposed housing layout, we would recommend an easement from the watercourse to ensure that flooding does not affect the future houses.

### 3.1.3 Flood Risk from the Foul Sewer in London Road

London Road presents regular flooding, making it impossible to pass on foot and very difficult to drive through. Residents reported that the flooding gets worse here each year, and considering that the public foul system is within London Road, this also poses a health risk to have foul sewage flooding the road.

Further investigation is required of London Road flooding, as we have not been able to review the sewer maps. However, the proposed development must not exacerbate the flooding in London Road. Due to the reported incidences of flooding on London Road, it suggests the foul sewer is under capacity, if this foul sewer is to be used by the proposed development, this will need to be investigated, and the capacity of the sewer will need to be reviewed. If it is under capacity, the proposed development will need to upgrade the sewerage infrastructure.

### 3.1.4 Surface Water

The EA surface flood extents and flood depths (Figure 11) have been obtained from the EA open dataset. The majority of the development site is in a low risk zone, with areas of high risk surface water flooding following the brook. However, based on the residents feedback through the flyer campaign, we know that this is not accurate, and there is far more wide spread surface water flooding happening in Albourne than the map shows.

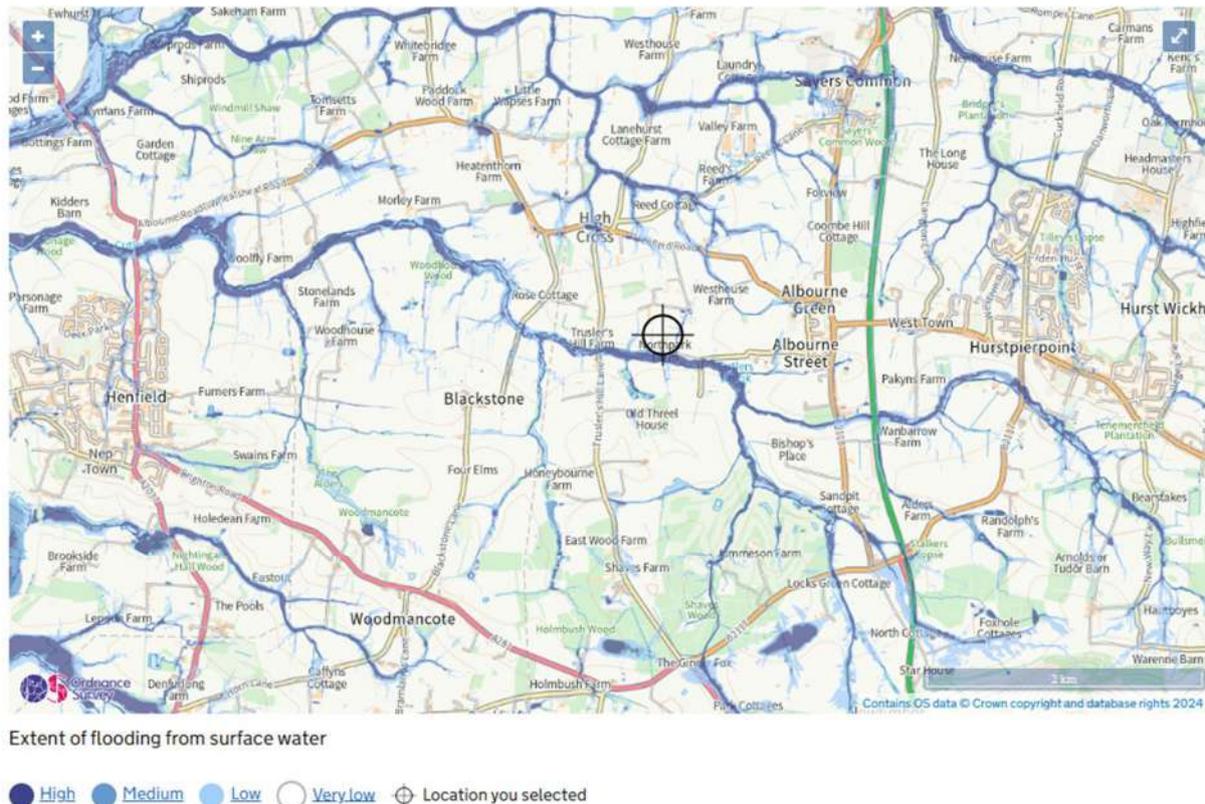


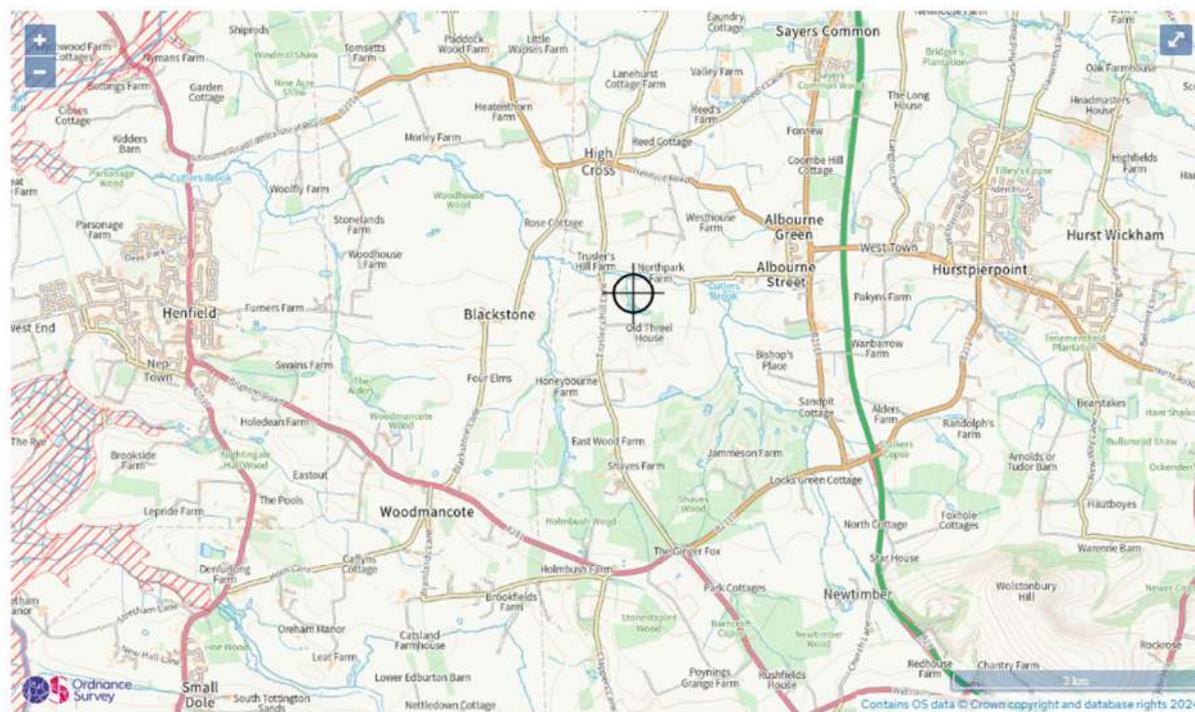
Figure 11: Extent of Flooding from Surface Water (Source: EA Open Dataset)

Further investigation of the flooding in the area is required to ensure the existing homes are not affected and the future housing is not at risk of flooding.

### 3.1.5 Flood Risk from Reservoir /Canals / Other Artificial Sources

The EA Extent of Flooding from Reservoirs map (Figure 12: Extent of Flooding from Reservoirs (Source: EA Flood Warning Information Service)), based only on large reservoirs (over 25,000 m<sup>3</sup> of water), shows that there is no flood risk from reservoirs. Flooding from reservoirs is considered to be extremely unlikely and the risk of flooding to the site is considered to be low.

There is no flood risk from canals or other artificial sources as there are no canals or artificial sources within the vicinity of the site.



Maximum extent of flooding from reservoirs:

- when river levels are normal
- ▨ when there is also flooding from rivers
- ⊕ Location you selected

Figure 12: Extent of Flooding from Reservoirs (Source; EA Flood Warning Information Service)

### 3.1.6 Flood Risk from Groundwater

According to Mid Sussex District Council Strategic Flood Risk Assessment Level 1, Albourne has a low risk of groundwater flooding. Please see an extract of the report below in Figure 13. However, as stated in section 2.3, the ground is clay and from the evidence received from the local residents, rainwater cannot drain through the ground. This suggests the ground is impermeable and careful consideration will need to be undertaken on overland flows.

The majority of the district is considered to have medium potential for groundwater flooding. A small area of the district, the southernmost part within the National Park, is considered to have high potential and the settlements of Burgess Hill, Hassocks, Hurstpierpoint, Albourne and Sayers Common, as well as countryside areas to the west are considered to be in an area of low potential for groundwater flooding.

Figure 13: Extract of Mid Sussex Strategic Flood Risk Assessment

### 3.1.7 Flood Risk from Sewers

Unfortunately sewer records were not able to be attained for this report. It recommended that the developers make an investigation in regards to sewer flooding. With particular note, as mentioned in section 3.1.1, that London Road has sewer flooding. This will need to be fully investigated and mitigated if the proposed development uses this sewer.

## 4. SUMMARY & CONCLUSIONS

A summary of the main conclusions for the FRA is presented below:

- The development proposal Sayer Village and how it will effect Albourne Village, West Sussex;
- The portion of Sayers Village proposed developments DPSC3 that falls within Albourne Parish Councils boundary is approximately 87ha;
- The River Adur enters the site in the west. There is a brook that runs through the site, entering from the west to south-east. The culvert is an ordinary watercourse and is named Cutlers Brook. The development does not affect the brook;
- The site lies at a mostly low risk of fluvial flooding - Flood Zone 1, however, the area following the brook is in Flood Zone 3 (confirmed by EA product 4 data);
- Ground conditions at the site are clay with impeded drainage;
- A flyer campaign was undertaken to get Albourne residents feedback on historic flooding in Albourne, 7 residents replied with evidence of frequent flooding that effected their roads, homes and gardens on a regular basis. Two of the affected areas were within the proposed Sayers Village development DPSC3;
- We would recommend that an overflow drainage investigation is undertaken at planning. The first scenario is understanding the existing situation, the second scenario is the proposed situation. Any flooding caused by the new development should be mitigated. Mitigation, firstly, not building in areas prone to flooding in flow routes. Secondly, the use of SuDS systems; maintaining and improving the existing drainage ditches and drainage infrastructure of the area. Or new drainage in the ways of cut off ditches at the parameters. We would expect that the proposed development would mitigate the flooding that starts on their land and effects households and third party land; and
- Further investigation is required of London Road flooding, as we have not been able to review the sewer maps. However, the proposed development must not exacerbate the flooding in London Road. Due to the reported incidences of flooding on London Road, it suggests the foul sewer is under capacity, if this foul sewer is to be used by the proposed development, this will need to be investigated, and the capacity of the sewer will need to be reviewed. If it is under capacity, the proposed development will need to upgrade the sewerage infrastructure.

## 5. REFERENCES

<b>Author</b>	<b>Date</b>	<b>Title/Description</b>
Department for Communities and Local Government	Mar 2012	Technical Guidance to the National Planning Policy Framework
Ministry of Housing, Communities and Local Government.	July 2021	National Planning Policy Framework

**APPENDIX C - Statement by Cllr John  
Spencer**

Albourne Parish Council have **strongly** objected to the Sayers Village proposal from the outset just on the sheer size of it in relation to the population of Albourne the population in the 2011 census was 600 people, not houses. Albourne Parish Council current Neighbourhood Plan 2014 – 2031 gave a projected number of new dwellings to be delivered during the plan period of 34. There have been some new dwellings but this portion was complete met by the 84 dwellings at the former Hazeldene being approved on Appeal in September 2020, Appeal Ref:APP/D3830/W/19/3241644, why such a large proposal was ever thought a sound idea is beyond our understanding.

We believe that, for such an important part of the District Plan, there has very been poor community engagement from MSDC. We believe that MSDC have only met their formal obligations around communication but nothing more. There was a 'false start' with regards to Regulation 18: a plan was circulated but then, we believe, withdrawn while MSDC lobbied for a lower housing number (they were unsuccessful). None of this was made clear to the local community. The District Plan was then launched under Reg 18, catching most people by surprise.

Many residents are in the dark about what has been going on and this was evidence as recently as 8<sup>th</sup> February 2024.

John Drew APC chair attended a meeting, on 8<sup>th</sup> February 2024, which was organised by WILD (Watchdog for Intrusive Local Development) where he was asked to address the residents in attendance and he put across that Albourne Parish Council **objected** and described the chain of events and that Albourne Parish Council would be involved in workshops, **before** any planning applications are made, with MCDC and the Developers. At the WILD meeting attended by 120 residents they were asked if they believed they had been fully consulted by MSDC and no one raised their hand, this a clear demonstration of the lack of community engagement.

Albourne together with other Parish Councils were invited to a meeting with MSDC 18<sup>th</sup> December 23 of which the outcome is that, although they accept that we all objected, we did accept to be part of a working group with MSDC and the Developers prior to any planning applications being made, which we feel will help to ensure that we can get the best outcome and keep our residents up to date.

Aspects Albourne Parish Council we will be looking at during these workshops are transport; drainage both foul and surface; flooding, all of which we have serious issues currently; utilities; the 20 minute neighbourhood as we currently have poor connections with local communities; and Dark Skies Initiative in relation to Albourne abutting South Downs National Park as this will be difficult to address with such a large development.

signed - John Spencer (Albourne Parish Councillors' lead on Planning)