Examination of the Mid Sussex District Plan 2021-2039

Hearing Statement Submitted by WILD

Matter 7: sites added by the draft Main Modifications

Albourne: MM82 - Land East of London Road
MM80 - Grange View House

Introduction

1.1 These sites are not sustainable both with regard to the specific topics identified for the hearings and on other grounds. In consequence, they are not sound. This conclusion should have been made clear if a proper sustainability appraisal had been carried out - a point we made in our consultation response. Moreover, it was expected that practical and political considerations would be applied in a review of the selected sites by the Council before the decision to submit was taken. This did not happen. If the Plan as a whole is to be sound, these sites should not be included.

1.2 We have written to Mid Sussex District Council to seek agreement on a Statement of Common Ground. A copy of our letter is attached (Appendix 1).

MM82 Land East of London Road

Compatibility

2.1 Inclusion of this site would not be compatible with the size and character of the village and the Council's own conclusion, expressed in the draft Plan, that Albourne is a Category 3 settlement suitable only for proportionate growth, not significant development. There are less than 200 houses in the village (as opposed to the parish) depending on the boundary used. The properties are a mix of styles and size, with four small purpose-built developments added around the village core since WW2 (Barn Close, Hunters Mead, Barley Croft and Leyfield). The village has grown proportionate to its size during this time, with other housing being added more recently in smaller numbers such as Magnolia Court, Holders and Oakwell to the north of the B2116.

2.2 MM82 would more than double the size of the core village by adding 250 houses. Although there would no doubt be some variation within the design model for the development itself, the overall effect would be to swamp and destroy the character of the village described above.

Heritage Assets

3.1 Policy MM82 states that layout and design will preserve or enhance the setting of the four Grade 2 listed properties adjacent to the site. The setting cannot be enhanced by the proximity of 250 new houses. Whether it could be preserved would depend on the details of layout and design which have not yet been made available. However, the only way to achieve this in practice would be by allowing sufficient open space which, because of the location of the listed properties, would severely compromise the policy as a whole.

Access and Movement

4.1 The site is bounded on three sides by the A23, B2116 and B2118. All three of these roads are busy relative to their categories as A and B roads. There is no active travel route from the site across the A23 along the eastern boundary, or north to Sayers Common, and access to footpaths and bridleways at the southern end of the site do not lead to meaningful destinations. Pedestrians and cyclists would be obliged to use the busy B2116, and/or navigate the B2116/B2118 junction. Vehicular access is proposed by means of the Albourne road. This would be close to the busy B2118/B2116 junction, leading to congestion.

4.2 We described the current traffic movement problems at Hurst High Street and the Sayers Common A23 junction in our consultation response and will not repeat the arguments here. Inclusion of this site in the Plan would add to these problems, for which no satisfactory solution has been found.

Social and Community Infrastructure

5.1 Policy MM82 provides for contributions to a range of facilities which would be provided elsewhere, presumably as part of the ‘Sayers Village’ masterplan, and open space facilities onsite. There would therefore be no meaningful infrastructure on this isolated development. There are limited facilities in Albourne village, and the site is outside the ten minute isochrone used to assess the suitability of active travel to ‘Sayers Village’. It would be at the very limit of access to the already oversubscribed facilities in Hurstpierpoint.

Site Conditions

6.1 The site slopes in the direction of Cutlers Brook, which is already subject to flooding, leading to road closure. Surface water runoff from the development would increase the volume of water and the frequency of disruptive flooding. The site is too limited to provide adequate attenuation ponds and drainage systems. No proposal has been made for effective waste water drainage, which would be made complex and costly because of the surrounding carriageways.

6.2 Effective noise mitigation could be achieved only by a combination of higher construction standards and the use of planting and/or fencing to reduce noise. Both would add to cost and threaten viability; the latter would further constrain the land available for use.

Sustainability Appraisal

7.1 Page 7 of the Sustainability Appraisal assesses MM82 (shown as Site Reference 1173). In our consultation response we argued that changes should be made to the scoring on four criteria across local sites: water, biodiversity, transport and economic regeneration. Where MM82 is concerned, further changes should be made to the scoring on flooding and cultural heritage. To illustrate the effect of such changes, if a simple numeric assessment is carried out (one or two positive points for minor or major benefit, and the opposite for negative impacts), the SA gives a net score of +2: adjusted as we propose, the score would be -7. In effect, a site considered marginally suitable becomes clearly unsound.

7.2 These points should have been subject to discussion within the Council before sites were recommended for inclusion. No such debate took place. In effect, an unmoderated assessment based on the claims of site developers/promoters has been accepted at face value. This site is unsustainable and therefore unsound, and should not be included in the Plan.

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MM80 Grange View House London Road

8.1 In terms of the planning balance, the harm caused by the development of this site far outweighs the benefit arising from the addition of only ten dwellings. It would be impossible to preserve the setting of the two listed buildings nearby - Mole Manor and Hillbrook House - and development would add density out of keeping with the character of the area. Access would be narrow and dangerous: the Parish Council has already had reports of safety and access issues arising from the entrance of Starley Close, a recent development nearby.

8.2 There will be no meaningful contribution to the benefits and facilities listed in the policy: in terms of access to social and community facilities, see para 5.1 above. With regard to surface and waste water disposal, the points made about site MM82 in para 6.1 apply.

8.3 Using the approach set out in para 7.1 above, the SA score for this site, listed as No.775, is +1; if revised, it would be -7. As described in para 7.2, the Council failed to apply proper scrutiny. Given the weight of the planning balance against the selection of the site, it is unsound and should not be included in the Plan.