

Mid Sussex District Plan 2021-39 Examination

Hearing Statement submitted by WILD

Matter 7: The Site Allocations DPSC3-7

Introduction

1.1 These sites are promoted independently by different developers. After they were included in the draft Plan the Council required that they be considered and co-ordinated together as a master-plan (Plan p170), using the name 'Sayers Village' coined by the promoter of DPSC3 - a further indication that this strategic development was not conceived through plan making, but was developer led.

1.2 Many of the questions in this Matter relate to infrastructure and bear on the general question of sustainability. In the latest Infrastructure Delivery Plan (IV6) the Council notes that the content will require further updating, but we know enough now to demonstrate that the Plan does not adequately lay the framework for the sustainable development of the 'Sayers Village' allocations DPSC3 and DPSC4-7.

1.3 The proposal to allocate DPSC3 has generated more objections at each stage of the planning process than any other site. Most recently, an exit poll conducted by campaigners at the presentation of 'Sayers Village' on 30/1/2026 showed near unanimous opposition. The strength of the objections demonstrates a common belief that such a scheme is wrong in this area: it will lead to permanent damage to the neighbouring villages and their rural environment, and the proposed 'benefits' - if they materialise - will not offset the harm done but create problems instead of delivering improvements.

DPSC3

2.1 In section 1, we provide an overview of DPSC3, including the Council's overarching case for the sustainability of this development. In section 2 we consider the amenities and facilities proposed for the site (Qs 7a,c,d). In section 3 we look at the implications for the wider transport network, not least because significant effective mitigation of car journeys is taken as a proxy measure of sustainability (7b), and in section 4 we look at the impact on the environment (7e,f,g). In section 5 we examine the viability and deliverability of the scheme (7h,i,j),

DPSC4-7

3.1 In section 6 we consider whether these sites, cumulatively, offer coherence and add value to the proposed master-plan approach. We then consider each site briefly, highlighting key points which bear on the questions a-h.

Section 1 - DPSC3 Overview

4.1 We demonstrated that the spatial strategy and site selection process were not sound in our responses to Matters 5 and 6: we will not repeat those arguments here, except to emphasise that the overall case for sustainability of this site is clearly at odds with policy imperatives and has not been properly tested through site selection. The case for allocation appears to rely particularly on two things: the concept of the 20-minute neighbourhood; and the required mitigations, amenities and facilities to be provided, as listed in policies DPSCGEN and DPSC3.

4.2 DPSC3 and the 20-minute neighbourhood

In our Reg.19 submission we showed that the core principles of the concept - compact, connected, complete - cannot realistically be achieved in an isolated rural setting but are more applicable to urban growth and regeneration, in developments within, or adjacent to, existing substantial settlements. We have no argument to make about the relevance of this notion to DPSC1&2. But DPSC3 is qualitatively different. It is some distance from the nearest train stations and Burgess Hill, the nearest town which can offer complementary amenities of sufficient range. As far as WILD is aware, at the time the Plan was submitted there were no examples of such 20-minute neighbourhoods in the countryside elsewhere; and none have been created since. Those which claim to use these principles in the countryside, mostly in Scotland, are schemes to connect existing villages, not to justify a significant isolated development of 2,000+ dwellings.

4.3 In the autumn of 2025, the Council organised meetings between local representatives and developers to create a vision for 'Sayers Village'. We have been a member of a subordinate working group led by the Parish Councils and have contributed actively and positively to the work. However, a number of conclusions are already clear.

4.4 The developers, and the Council, have no comprehensive vision themselves but rely on local people to develop a model for a collection of sites which came forward independently.

4.5 The work has produced nothing to support the case for sustainability. Each separate smaller site would likely largely function as an enclosed area, with nothing of merit to support social cohesion. Taken together, the sites lack connectivity and what is proposed does not complement facilities in the neighbouring villages. We explained this in more detail in our Reg.19 submission.

4.6 'The Hamlet' (area to the south of the B2116)

Although promoted as part of DPSC3, this is a purely opportunistic site. The graphic in the DPSC3 policy is designed to show this land as if attached to the main site: it is not and cannot be made so, because of existing properties at the nearest corners. To allocate this land would not be sound, and would be a significant failure of effective, positive planning.

Section 2: Amenities and Facilities (MIQ 7a,c,d)

5.1 The Goldilocks Test

To achieve sustainability, the plans for significant sites such as DPSC3 must be 'just right'. The development should be large enough to support and fund a wide range of amenities and facilities, but not so large that it causes unjustified and disproportionate damage to sustainability in the surrounding area. If it is too small, on the other hand, it will lack the necessary critical mass. At a strategic level DPSC3 fails this test. It would be large enough to dominate Sayers Common and Albourne, destroying their character, integrity and environment and effectively merging them. However, it would still not have the critical mass required to deliver sustainability for itself, or improve that of the two existing villages.

5.2 In this section we show how the amenities and facilities proposed for the development fail this test.

Education

6.1 One of the most significant proposals in terms of social cohesion is for an all-through secondary school. We make the following points:

6.2 The case for this is already badly weakened. School rolls are falling: the decision has already been made not to proceed with this provision in the Northern Arc development, but to fund appropriate expansion in the Burgess Hill Academy.

6.3 Homes England guidance indicates that an average sized secondary school is required for 8,000 homes. 'Sayers Village' (assuming the allocation of sites DPSC3-7) is less than a third this size. Secondary schools in rural areas are located in or adjacent to towns, so that a smaller number of pupils have further to travel: here, the proportions would be reversed, with c.70% of pupils travelling in (many travelling by car, given the limited public transport available). And if the school's size is matched to the development, it will itself lack critical mass in terms of teaching staff and subjects to be offered. It fails the 'just right' test.

6.4 Healthcare

There will be no primary care facilities at DPSC3 and 4-7: instead, capacity at existing facilities will be expanded, with the result that all residents will need to travel to Hurst or beyond. Extra care housing is proposed, although there is a newly opened care home in Sayers Common and a retirement village under construction at Albourne. Both villages already have early years provision. What could support sustainability will not be provided; and what will be provided will

duplicate what is already there. As a result, car journeys will increase. Once again, the proposals fail the 'just right' test.

6.5 Employment and Retail

Employment and retail, together with education, are the most significant factors influencing car movements. Retail, of course, cannot be mandated by planners and is unlikely to expand beyond the convenience store (which already exists in Sayers Common) - no-one suggests that many people will carry out the weekly shop by active travel. Our calculation is that there could be c.240 new long term jobs as a result of 'Sayers Village', where up to 3,600 people could be in, or looking for, paid employment, and will need to travel by car for it. The on-site offer is far too small to contribute to sustainability: the scheme cannot be made 'just right'.

6.6 Climate Change

Here we focus on climate change mitigation and in particular flooding. There is no recorded evidence of flooding on DPSC3: these are greenfields, without houses. However, there is plenty of evidence of flooding on the roads and developed areas which surround the site. Reeds Lane is often impassable in winter, and Sayers Common is regularly subject to flooding. Please see our comments in response to Matter 5 about the geology and geography of the area. The area is classified as 'seriously water stressed' and there is limited spare capacity (IV6 p60). Both water companies are under formal licence review.

6.7 Design/Sustainable Transport

With regard to question a), we cannot comment in any detail on design principles and layout which have only been described in vague terms and continue to change. Problems with active and sustainable travel are considered below.

Section 3: The Wider Transport Network(MIQ 7b)

7.1 We described the inadequacies of the transport studies in our Matter 5 statement. Although National Highways and WSCC have signed Statements of Common Ground accepting these studies, serious concerns remain. In the case of WSCC, for example, these studies are at odds with the conclusions they reach in their own Local Transport Plan, which recognises that travel behaviour is, and will continue to be, dominated by car travel, and sustainable travel in a rural location is unlikely to be an effective substitute.

7.2 Mitigation of the impact on the transport network as described in the Plan rests on three planks, all of which are intimately bound up in the 20-minute neighbourhood concept. One is that residents will have many of the facilities and amenities they need so they will not have to make car journeys; the second is that active travel will reduce car travel; and lastly sustainable transport will also apply a downward pressure. The Council promises its strategy "will help to reduce the tidal flow of people out of the settlement each day" (Plan p39). In fact, as shown above in relation to the likely number of journeys for work, education, healthcare and shopping etc, the proposed allocations mean the tidal flow of cars will significantly increase in both directions.

7.3 Next we focus on active travel, and sustainable transport. To have any hope of influencing travel behaviour, changes must be introduced at the beginning of build out, not part way through or at the end. But even if this is done, the location of the site, away from a transport hub and next to the A23, will predispose residents to use their cars.

7.4 Active travel provision included in the plan - the upgrade of a single cycle route to the outskirts of Burgess Hill - is too narrow and limited. The roads around the collected sites would also need to be adapted for safety and upgraded to meet national standards. In some cases, this is simply not possible to do. We have conducted our own study of active travel potential in the area. The cost of the necessary upgrades to deliver a safe network would be prohibitive, and further challenge the viability of the scheme - please see Appendix B to WILD's Matter 5 statement, which considers the cost of only two cycle routes around DPSC3.

7.5 Avtrade have not been approached about the proposed allocation of DPSC3, despite being the largest local employer who makes a significant contribution to the local economy and whose site is on Reeds Lane. They describe their objections and concerns in Appendix A. In summary, their own experience is that despite their best efforts, car travel remains the dominant mode of transport for their staff, and environmental mitigations for DPSC3 in particular are likely to be less effective and more expensive than proposed in the Plan. Reeds Lane is an essential access route for their business, and they have real concerns about the implications of the proposed development for the security and aviation regulation accreditations they must maintain.

7.6 The promoter of DPSC3 has produced a Mobility Strategy for the site which has been endorsed by the Council. This study is based on an earlier document produced for the promoter of the (no longer pursued) 10,000 - 15,000 unit Garden City located between Sayers Common and Henfield - see for example the reference at 3.13. Most locational references have been revised, but the principles of the Garden City have not. The document reinforces the point of the 'Goldilocks test': to have the critical mass which would, for example, provide meaningful employment opportunities to restrict travel, a scheme would need to be some four to five times the size of 'Sayers Village'. Inadvertently, this strategy reveals the fundamental sustainability problem associated with DPSC3-7: taken together, they are of a size that will destroy the character and integrity of the neighbouring villages and surrounding rural area, but are too small to provide sustainability for themselves, or offer meaningful improvement to those settlements.

7.7 The Mobility Strategy concludes that a direct rail service is not feasible. Instead, (4.19) 'high quality bus links' are proposed. The strategy sets out three scenarios covering periods of 7-13 years, requiring subsidies in the range £645,000 to £1,060,000. This will be a pump-primer rather than securing a permanent solution. As Inspector Davies noted (APP/L3815/W/24/3344538 Para 28), "Examples of other developer funded bus services show that the large majority cease after funding is withdrawn, or require public support."

Section 4 Environment (MIQ 7e,f,g)

8.1 Greenfield development destroys biodiversity. We endorse the submission made by the Woodland, Flora and Fauna Group, which demonstrates the failure to deliver sustainability on environmental grounds. National priorities, the Council's own policies and a proper sustainability assessment should have steered plan makers away from this allocation. In addition, the overall character of the rural landscape, much valued by the community, will be destroyed, and the boundary between the two villages of Albourne and Sayers Common will be eroded to the point of coalescence.

Section 5 Viability and Deliverability(MIQ 7h,i,j)

9.1 Our viability note demonstrated a viability gap of c.£66m (Appendix B). Although The Plan's viability note was revised in September 2024, it requires further review to take account of the fact that inflationary increases in materials and labour post COVID have added some 15% -20% to costs, while purchasing power has not kept pace.

9.2 In addition, costs have been significantly understated in terms of: highway infrastructure which an objective assessment of traffic projections would demonstrate is needed; an active travel network delivered at the start of build-out to support behavioural change; and water management schemes to remove surface and waste water in the volume and at the pace climate change will require.

9.3 Taken together, these will further undermine the viability and deliverability of the scheme, threatening the affordable housing component and the provision of amenities and facilities which are part of the original justification. The assumptions relied on by the Council are not realistic or deliverable. Therefore, DPSC3 would not result in sustainable development: the proposed allocation is not positively prepared, justified, effective, or consistent with national policy.

Section 6 DPSC4-7

10.1 Sayers Common has already absorbed development out of all proportion to its size and character. Each of the sites DPSC4-7 has an internally focussed layout with one main point of ingress and egress, and they will add significantly to traffic congestion because of their proximity to the A23. Together they would provide a 'concrete lining' to the Sayers Common 'bowl' which drains to the centre of the village. Significant work has been carried out by Southern Water recently to address current flooding problems. But surrounding the bowl with development will create difficulty of a different order of magnitude, for which there will be no easy solution.

10.2 Therefore, considered together with DPSC3, DPSC4-7 would not result in sustainable development. The proposed allocations are not positively prepared, justified, effective or consistent with national policy.

11.1 We have the following additional points to make about individual sites:

11.2 DPSC4. There is no commitment to the master-planning process by the developer. Traffic flows on Reeds Lane must be considered in the context of the Old Brickworks site, now nearing completion; DPSC6; and use of Reeds Lane as an east/west through route.

11.3 DPSC5. We have already submitted an objection to the pre planning application. In brief the key points are: the site is detached from Sayers Common; ancient woodland would be destroyed; development would increase flood risk on the B2116 and houses on the west side; heritage buildings would be overwhelmed; access to the site would, with other access points including to DPSC3, create a complex and dangerous junction.

11.4 DPSC6. There is no commitment to the master-planning process by the developer. Traffic flows on Reeds Lane have not been considered: see DPSC4. There is a history of flooding on this site: testing in line with NPPF guidance should require an alternative site to be substituted.

11.5 DPSC7. We support improved facilities for the school but question whether this is the right location: traffic flows cannot be mitigated and a position in close proximity to housing is inappropriate. Connectivity with DPSC3 via DPSC6 has been ruled out, and surface water flooding is likely to drain to DPSC6, the Old Brick Works, and Reeds Lane.

Conclusion

12.1 DPSC3 should not be allocated, for the reasons set out here and in our submissions on other Matters. A review of the SHELAA should identify other sites to replace it.

12.2 DPSC5 should be omitted for the reasons summarised above and detailed in our objection to that proposal, and DPSC6 should be omitted, in particular on grounds of flood risk.

12.3 DPSC4 should be reviewed in particular on flooding and traffic grounds; DPSC7 should be reviewed in particular on the grounds of flood risk, site layout and density. If these sites pass the tests with modifications, they could be allocated; otherwise, they should be omitted.