



# **EXAMINATION IN PUBLIC**

## **MID SUSSEX DISTRICT LOCAL PLAN**

### **REPRESENTATION ON BEHALF OF SAYERS COMMON VILLAGE SOCIETY**

#### **SITE ALLOCATIONS DPSC3, DPSC4, DPSC5, DPSC6 AND DPSC7**

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## **1. Introduction and Scope of Representation**

1.1 Sayers Common Village Society ("SCVS") has represented residents of Sayers Common for approximately twenty years and currently comprises around 130 members. Its purpose is to protect, promote and enhance the quality of life for all who live and work in the village.

1.2 SCVS recognises the need for additional housing across Mid Sussex and does not object to development in principle. However, it objects to the allocation of sites DPSC3, DPSC4, DPSC5, DPSC6 and DPSC7 within and around Sayers Common.

1.3 SCVS submits that, individually and cumulatively, these allocations render the Local Plan unsound under paragraph 35 of the National Planning Policy Framework (NPPF, December 2023).

1.4 In particular, the allocations are:

- Not justified (NPPF para 35(b))
- Not effective (NPPF para 35(c))
- Not consistent with national policy (NPPF para 35(d))



The concerns arise from the disproportionate scale of growth, cumulative infrastructure impacts, flood risk, wastewater constraints, transport capacity, biodiversity fragmentation and the erosion of settlement identity.

## **2. The Tests of Soundness**

2.1 Under NPPF paragraph 35, Local Plans must be:

- a) Positively prepared
- b) Justified
- c) Effective
- d) Consistent with national policy

2.2 SCVS does not dispute the overall housing requirement. However, the spatial distribution and cumulative quantum at Sayers Common has not been demonstrated to be:

- The most appropriate strategy
- Infrastructure-led
- Environmentally sustainable
- Deliverable within the plan period

## **3. Settlement Hierarchy and Proportionality of Growth**



3.1 Sayers Common is a small rural settlement of approximately 900 residents and around 250 dwellings (2021 baseline).

3.2 Since 2021, three significant developments (Goldcrest, Winter Green Way and Woodlands) have already materially increased the built form and population of the village.

3.3 The addition of five further allocations represents a substantial percentage increase relative to the existing settlement base.

3.4 NPPF paragraph 20 requires strategic policies to set out an overall strategy for the pattern and scale of development and to make sufficient provision for infrastructure.

3.5 Paragraph 124 requires development to make efficient use of land while taking account of local character and the setting of settlements.

3.6 SCVS submits that the cumulative scale proposed is disproportionate to the size, role and infrastructure capacity of the village.

3.7 The Sustainability Appraisal has not demonstrated that concentrating this level of growth in Sayers Common is the most appropriate alternative when compared with higher-order settlements with stronger transport and infrastructure capacity.

3.8 The Plan is therefore not justified within the meaning of NPPF paragraph 35(b).

## **4. Coalescence and Loss of Settlement Identity**

4.1 Sayers Common is distinct from neighbouring villages including Albourne and Hurstpierpoint.



4.2 The land at Coombe Farm and land south of Albourne presently provide open countryside gaps that prevent physical and visual merging.

4.3 NPPF paragraph 127(c) requires development to be sympathetic to local character, including landscape setting.

4.4 Paragraph 180 requires planning policies to protect and enhance valued landscapes.

4.5 The cumulative impact of allocations DPSC3 and DPSC5 materially reduces settlement separation and risks incremental coalescence over time.

4.6 SCVS submits that the Plan fails to give sufficient weight to the functional role of these areas in maintaining settlement distinction.

4.7 The allocations are therefore not consistent with national policy.

## **5. Flood Risk, Surface Water and Climate Resilience**

5.1 Sayers Common lies within a natural basin. Surface water flows from surrounding higher ground into the centre of the village.

5.2 The underlying clay soils have limited infiltration capacity and contribute to surface water retention.

5.3 NPPF paragraph 162 requires application of the Sequential Test to steer development to areas of lowest flood risk.

5.4 Paragraph 166 requires development to be safe for its lifetime without increasing flood risk elsewhere.

5.5 The proposed allocations are predominantly on elevated land surrounding the settlement. Increased hardstanding will increase peak runoff into the village.



5.6 SCVS submits that cumulative surface water modelling across all five allocations has not been robustly demonstrated.

5.7 Given climate change allowances (NPPF para 165), infrastructure must be proven to be deliverable, funded and phased in advance of occupation.

5.8 In the absence of this evidence, the allocations are not effective and conflict with national policy.

## **6. Wastewater Capacity and Deliverability**

6.1 Residents have experienced sewage surcharging and system overload.

6.2 NPPF paragraph 180(e) requires planning decisions to prevent unacceptable levels of water pollution.

6.3 Paragraph 35(c) requires that plans are deliverable.

6.4 Unless Southern Water has confirmed:

- Available network capacity;
- Funded upgrade programmes;
- Clear delivery timescales aligned with occupation;

the allocations risk being undeliverable within the plan period.

6.5 SCVS submits that this infrastructure constraint has not been satisfactorily resolved.



## **7. Transport, Traffic and Highway Safety**

7.1 Sayers Common lies on the B2118, a route used for access to the northbound A23.

7.2 Traffic data recorded 882,630 vehicle movements between April 2024 and September 2025, of which 526,690 exceeded the 30mph speed limit.

7.3 NPPF paragraph 114 states that development should only be refused on highways grounds if residual cumulative impacts are severe or there would be unacceptable safety impacts.

7.4 NPPF paragraph 115 requires safe and suitable access for all users.

7.5 SCVS is concerned that transport assessments consider sites individually rather than cumulatively.

7.6 The failure to model all five allocations together materially understates real-world impacts.

7.7 In the absence of robust cumulative modelling and effective mitigation, the allocations cannot be considered effective.

## **8. Public Transport, Rail Access and Realistic Sustainability**

8.1 NPPF paragraph 105 requires significant development to be focused on locations which are or can be made sustainable through limiting the need to travel and offering genuine transport choice.



8.2 The existence of nearby railway stations does not in itself demonstrate sustainability. The critical issue is realistic and reliable access.

8.3 Sayers Common does not have a railway station. The nearest stations are Hassocks and Burgess Hill.

8.4 In practice, most residents must travel by private car to reach these stations.

8.5 Hassocks station car park reaches practical capacity early in the weekday morning peak, typically by approximately 08:00. This results in:

- Overspill parking on surrounding residential streets
- Increased congestion near the station
- Reduced accessibility for local residents

8.6 While Burgess Hill station may offer greater capacity, it is further from Sayers Common and also subject to significant demand from existing and planned housing growth within Burgess Hill itself.

8.7 With additional allocations in Hassocks, Burgess Hill and Sayers Common, cumulative demand for station parking is likely to increase materially.

8.8 Without:

- Significant expansion of station parking capacity;
- Dedicated high-frequency bus links aligned with commuter timetables;
- Secured funding for sustainable access infrastructure;

it is unrealistic to assume that future residents will access rail services without increased private car reliance.

8.9 In practice, constrained access to Hassocks and Burgess Hill may displace commuter parking to more distant stations such as Haywards Heath, whose weekday parking provision is also frequently at capacity.



8.10 This displacement effect undermines the sustainability case for locating significant development in Sayers Common.

8.11 SCVS submits that the Plan has not demonstrated that rail access capacity — including parking, bus connectivity and interchange — has been assessed cumulatively across planned growth locations.

8.12 Accordingly, the reliance on rail connectivity to justify the sustainability of the proposed allocations is not robustly evidenced and conflicts with the objectives of NPPF paragraph 105.

## **9. Biodiversity and Ecological Networks**

9.1 NPPF paragraph 180(d) requires planning policies to minimise impacts on biodiversity and provide net gains.

9.2 Paragraph 185 requires protection and enhancement of ecological networks and wildlife corridors.

9.3 Sayers Common includes ancient woodland and established habitats supporting protected and priority species.

9.4 The cumulative effect of five allocations risks fragmentation of wildlife corridors and degradation of ecological connectivity.

9.5 Biodiversity Net Gain (minimum 10%) must be secured for at least 30 years.

9.6 SCVS submits that there is insufficient evidence of a coordinated village-wide ecological strategy.

9.7 Without such coordination, the Plan is not consistent with national policy.



## 10. Infrastructure Coordination and Masterplanning

10.1 NPPF paragraph 20 requires strategic policies to provide for infrastructure.

10.2 Paragraph 35(c) requires deliverability.

10.3 Five separate allocations without a binding masterplan risk:

- Fragmented drainage systems
- Disconnected highway mitigation
- Inconsistent design
- Infrastructure delivered out of sequence

10.4 SCVS submits that a comprehensive village-wide masterplan, including phasing and infrastructure scheduling, is required before allocations proceed.

10.5 In the absence of this framework, the Plan is not effective.

## 11. Overall Conclusion on Soundness

11.1 SCVS respectfully submits that allocations DPSC3–DPSC7 render the Plan unsound because they are:

- Not justified – disproportionate and not demonstrated as the most appropriate strategy (NPPF para 35(b));
- Not effective – infrastructure constraints unresolved and cumulative impacts inadequately assessed (NPPF para 35(c));
- Not consistent with national policy – conflict with policies on flood risk, biodiversity, sustainable transport and landscape protection (NPPF para 35(d)).



11.2 SCVS requests that the Inspector either:

a) Finds the Plan unsound in respect of these allocations; or

b) Recommends Main Modifications requiring:

- A comprehensive village-wide masterplan
- Confirmed wastewater upgrades prior to occupation
- Cumulative transport modelling
- Settlement gap protection
- Coordinated ecological mitigation strategy

11.3 SCVS reiterates that it supports proportionate, infrastructure-led development. However, the current proposals represent a cumulative level of growth that exceeds the environmental and infrastructure capacity of the village.