



REGISTERED CHARITY NO.263520
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The Hurstpierpoint Society

The Charity's first object is:

for the public benefit to protect and conserve
the natural and built environment of
Hurstpierpoint and the surrounding area.

A response to
Mid Sussex District Plan Review 2021 - 2039
Consultation Draft (Regulation 18)

Presented on behalf of our 1,300 members

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18th December 2022

This document follows the Chapters from the Mid Sussex District Plan 2021 – 2039 Consultation Draft (Regulation 18) with a foreword and concluding comments from The Hurstpierpoint Society:

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Foreword from The Hurstpierpoint Society

- i. The Hurstpierpoint Society, founded in 1962, is a well-supported village charity with over 1,300 members, all committed to improving and protecting our village environment. We take a particular interest in planning issues that might irrevocably damage the appearance and character of this historic village or the ecology of the surrounding countryside.
- ii. Following the Civic Amenities Act 1967 that required councils to determine areas of special architectural or historic interest and to designate them as conservation areas, the Society was one of the prime movers in achieving Hurstpierpoint's original Conservation Area in 1972, centred on the High Street. It was the third village in Sussex to obtain conservation Status and the village now has three conservation areas and almost 100 listed buildings.
- iii. Our bustling High Street contains both listed and unlisted buildings dating from the 14th century, including shops with living accommodation above. This results in a richness of streetscape which defines Hurstpierpoint as a village of character and charm.
- iv. The early days of the Society centred on 'preservation and conservation', but the role has evolved over the years to one of protection and conservation. Whilst accepting that change has to occur and building has to happen, especially as the population of Mid Sussex has grown and technology has evolved including the need for energy efficiency, it is a case of both where and how this happens. The Society has invested in infrastructure projects relating to conservation and historical significance, and with more concern about environmental issues, we've looked at ways to improve the visual and environmental aspects of our village and leave a lasting legacy for future generations.
- v. This response to the Mid Sussex District Plan 2021 – 2039 concentrates on the impact to the Parish of Hurstpierpoint & Sayers Common and surrounding area, both people and the natural and built environment. Therefore it concentrates on 7 sites namely:
 - Site 740 [Policy DPSC1] Broad location to the west of Burgess Hill
 - Site 799 [Policy DPSC2] Land to the south of Reeds Lane
 - Site 13 [Policy DPH16] Land west of Kemps, Hurstpierpoint
 - Site 1026 [DPH19] Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common
 - Site 601 [Policy DPH20] Land at Coombe Farm, London Road, Sayers Common
 - Site 830 [Policy DPH21] Land to the west of Kings Business Centre, Reeds Lane, Sayers Common
 - Site 1003 [Policy DPH22] Land to the south of LVS Hassocks, London Road, Sayers Common
- vi. Chapters 1 to 17 of the District Plan are discussed in order, with specific reference to this area and concluding comments at the end.

1. Chapter 1 Introduction

1.1. This review and update of the District Plan by MSDC is required by The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). However, the National Planning Policy Framework (NPPF) also states the following needs to be considered:

- Any changing circumstances affecting the area
- Any relevant changes in national policy

1.2. Following the combined influences of Brexit, the Levelling up agenda and the effects of the Covid pandemic, there are major ongoing changes and concern as to when and how they can be incorporated into this process.

1.3. On 5th December 2022 the government conceded to pressure from parliamentarians and the public on a range of key planning issues including:

- An abandoning of centralised mandatory housing targets that have led to needless, unaffordable and poorly designed greenfield developments, in favour of an advisory system that takes local character and need into account. This means that Districts will be allowed to build fewer homes if it can be shown that the targets will significantly change the character of an area, eg from rural to urban.
- An end to landbanking by developers who sit on land they have acquired permission for while it accrues in value. This is a huge cause of the lack of housing being actually built, despite having planning permission, and Councils needing to find more land to build on.
- Local authorities given greater powers to promote brownfield development, and a wider review into brownfield development including building more homes in the North and Midlands as part of the Governments levelling up policy.

1.4. At a recent meeting of the Levelling-Up select committee, Michael Gove, the Secretary of State for Levelling Up, Housing and Communities stated: *"There's been a lively debate about how those numbers are generated and how we make judgements about household information and population growth overall".* He added *"My own view is that whatever figures you arrive at nationally, and how it's broken-down authority by authority, **a greater proportion of housing need should be met in urban areas on brownfield sites.**"*

- 1.5. Michael Gove has also stated that the current planning system is dysfunctional and in need of reform. These amendments will be included in the Levelling Up and Regeneration Bill, currently going through parliament but unfortunately the Regeneration Act is unlikely to be law until 2024, the year that formal adoption of this District Plan is expected.

- 1.6. Additionally, the Habitats Directive in place since 1992, which governs and restricts developments within the 7km zone of influence around the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC), is also under review as part of the Brexit Freedoms Bill. This is likely to be retained in its current form until the end of December 2023, but after that more of the northern half of the District may be available for sustainable development, without the need to provide such large areas for Suitable Alternative Natural Greenspace (SANG).

- 1.7. The Country is still recovering from the impact of covid. People wanted to move out of crowded cities during the pandemic to live in the countryside but with life returning to normal, including returning to the office, and with the changing circumstances of high fuel costs and train strikes, the appeal of countryside living is waning. There are no “normal” trends for the last 3 years on which to base forecasts and a constructive understanding of housing need.

2. Chapter 2 Background

- 2.1. The local plan relies on data produced in the Census 2021. This was the first British census mainly completed online and went ahead despite the Covid 19 pandemic. It was thought that the information would assist government's understanding of the pandemic's impact.
- 2.2. Data is still in the process of being released and the District Plan Review includes the words "estimated" and "projected" with reference to the population data used. The first results from Census 2021 were released on 28th June 2022 and more details will be released in spring 2023, including the alternative population bases. These are different geographical locations where individuals could have been counted for the census and include workplace, workday and out-of-term populations.
- 2.3. This District Plan review will need to be reviewed again once this data is available, but even then, it will be a snapshot taken at an untypical time for the country.

3. Chapter 3 Achieving Sustainable Development

3.1. "The National Planning Policy Framework (NPPF, July 2021) is clear that the purpose of the planning system is to contribute to the achievement of sustainable development *meeting the needs of the present without compromising the ability of future generations to meet their own needs*"

3.2. Despite this quote at the beginning of this chapter, the proposals for the Parish of Hurstpierpoint & Sayers Common do not protect and enhance the natural, built and historic environment of these villages and others nearby, which will be discussed in the relevant sections. The aim of the Town and Country Planning Association (TCPA) - 'Guide to 20-minute Neighbourhoods' (March 2021) is more suited to urban rather than rural neighbourhoods, with the acceptance that people in villages would need to travel to have access to facilities. It surely is more appropriate to build houses closer to these facilities rather than allocating nearly 50% of the total new homes to areas that already have traffic congestion due to the historical layout of the Hurstpierpoint High Street, surface water flooding that will only be exacerbated by building on green fields, and air quality issues on the main access route to the nearest railway station.

4. Chapter 4 Supporting Evidence

4.1. There are several evidence-based studies with two given special mention – Sustainability Assessment and Habitats Regulations Assessment. This chapter also covers the duty to co-operate with neighbouring authorities.

Sustainability Assessment (SA)

4.2. Following hearing sessions held in June 2021 and the completion of Action Points, the Inspector provided suggested modifications to the Council's Site Allocations Development Plan Document (Sites DPD), which were subject to consultation between November 2021 and January 2022. The Sustainability Assessment Report (SA) incorporates the Council's responses to the Examiner's issues and questions. From this, a number of points arise for the sites referenced in the SA in and around Hurstpierpoint and Sayers Common listed below, with the District Plan Policy number in brackets:

- **Site 740 [DPSC1]** Broad location to the west of Burgess Hill (though actually in Goddards Green and north Hurstpierpoint)
- **Site 799 [DPSC2]** Land the south of Reeds Lane but mainly situated in Albourne
- **Site 13 [DPH16]** Land west of Kemps, Hurstpierpoint
- **Site 1026 [DPH19]** Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common
- **Site 601 [DPH20]** Land at Coombe Farm, London Road, Sayers Common
- **Site 830 [DPH21]** Land to the west of Kings Business Centre, Reeds Lane, Sayers Common
- **Site 1003 [DPH22]** Land to the south of LVS Hassocks, London Road, Sayers Common

Sustainability Assessment

<p>Categories in the Regulation 18 Sustainability Assessment Report dated October 2022</p>	<p>Comments incorporating the Regulation 18 Sustainability Assessment Report dated October 2022</p>
<p>Health & Wellbeing (C.3)</p>	<p>All sites are outside the 5km target distance from an NHS Hospital. All sites are outside the 1.2km target distance from a GP Surgery or Health Centre (considered to be a 15-minute walk). However, 740 is within 20 minutes' walk from healthcare facilities. Only 740 is within the 1.5km target distance from a Leisure Centre. Sites 601 & 740 are within 200m of a main road, therefore at risk of high levels of Noise & Air Pollution. Sites 13, 601, 740 & 799 are outside the 300m target distance from a recognised/accessible Greenspace.</p>
<p>Education (C.4)</p>	<p>Only 13 & 799 are within the target 15-minute walk (approx. 1.2km) from a Primary School. 740 & 1026 are within 20 minutes. Only 740 is within the 1.5km target distance from a Secondary School.</p>
<p>Community & Crime (C.5)</p>	<p>Only site 13 is within the target distance of 15 minutes' walk from any Community Facilities (e.g. local shops, community halls, libraries, places of worship). All other sites are more than 20 minutes' walk from facilities. Only site 13 is within a 30-minute public transport journey from community facilities. Only 13 & 1026 are within 150m from an existing Built-up Area Boundary, which could impact cohesion & integration into the wider community.</p>

<p>Flooding (C.6)</p>	<p>Site 740 is partially within Fluvial Flood Zone 3, which means there's at least 1% chance of annual flooding from nearby watercourses, though with climate change, this may increase. The remaining sites are located in Flood Zone 1, which represents less than 1% chance of annual fluvial flooding, again subject to increase with climate change. Apart from 13, all sites coincide with areas of high Surface Water Flood Risk (SWFR), meaning there is at least a 1/30 probability of surface water flooding in these sites, again subject to increase with climate change.</p>
<p>Natural Resources (C.7)</p>	<p>All sites are on undeveloped land: "negative impacts on natural resources associated with an inefficient use of land and the permanent and irreversible loss of Ecologically Valuable Soils."</p> <p>All sites are classified as agricultural land grades ALC 1-3, and the proposed developments are expected to cause irreversible loss of best and most versatile land (BMV) i.e. valuable soil resources. This is a particular issue for 740 & 799, due to their size being >20ha.</p> <p>All sites coincide with Mineral Safeguarding Areas (MSAs) that contain brick clay, consolidated bedrock or unconsolidated sand.</p>
<p>Biodiversity (C.8)</p>	<p>Sites 601 & 740 coincide with areas of both Ancient Woodland and Priority Habitats (these include deciduous woodland, grass moorland and traditional orchard). Site 740 also contains one or more Veteran Trees, and one or more trees protected by Tree Preservation Orders.</p>
<p>Landscape (C.9)</p>	<p>Sites 13 & 799 are located in close enough proximity to the South Downs National Park, that there's potential for new development to alter the setting of the landscape.</p> <p>All other sites are in areas where development could have the potential to significantly impact landscape character and setting.</p> <p>All sites are located in the vicinity of Mid Sussex's PRoW network, and the developments could potentially alter the views of countryside or open space currently experienced by the users of these footpaths.</p> <p>Site 799 could lead to a loss of separation between communities (Albourne & Sayers Common), with an increased risk of Coalescence.</p>

<p>Cultural Heritage (C.10)</p>	<p>Sites 13, 601 & 799 are located within close proximity to a Listed Building and have been identified to have a potential negative impact on these heritage assets. Site 13 is close to a Conservation Area and could have a high negative impact on their setting.</p>
<p>Climate Change & Transport (C.11)</p>	<p>Although none of the sites are within 200m of the AQMA at Stonepound crossroads, people wishing to use the railways as a means of sustainable travel are likely to use Hassocks station as the nearest station, and this will result in increased traffic through here.</p> <p>601 & 740 are within 200m of a main A-road, and as such could potentially have a minor negative impact on transport-related emissions.</p> <p>However, the main route through Hurstpierpoint is very narrow with 3 storey buildings close to the road, additionally this route is gridlocked at times with users and residents exposed to air and noise pollution. As this is a main arterial road from east to west then this situation will worsen with increased traffic flows. Sites 13, 740 & 799 are identified as having the potential for 'fair' Bus Services. 601, 830 and 1026 are considered to have the potential for 'good' services, and 1003 'excellent'.</p> <p>All sites are beyond the target distance of 1.2km/15-minutes' walk from a Railway Station.</p> <p>All sites are beyond the target distance of 1.2km/15-minutes' walk from Local Services, and the lack of Pedestrian Access to these is a major negative. Furthermore, site 13 is the only one considered to have pedestrian access to a Convenience Store.</p>
<p>Energy & Waste (C.12)</p>	<p>Sites 740 & 799 could result in more than 1% increase in Household Waste generation in the area, considered a major negative impact. Sites 601, 740, 799, 830 & 1003 could have major negative impacts on greenhouse gas emissions relating to Energy Consumption.</p>
<p>Water Resources (C.13)</p>	<p>There's a risk of Watercourse Contamination from proximity to sites 740, 830 & 1003, as all are within 200m of a watercourse. This will have a detrimental effect on the River Adur.</p>

Economic Regeneration (C.14)	Site 13 is the only one within the target distance of 15-minutes' walk and 30-minutes on public transport from Local Services, which could benefit by economic stimulation from the increased footfall.
Economic Growth (C.15)	All sites are within the 5km target distance from employment opportunities, however are there enough opportunities for this number of houses and residents? If there was only one working resident per household, then this would require over 4,000 jobs but these are in addition to the housing developments already taking place in Burgess Hill and Hassocks.

Habitats Regulations Assessment

4.3. The Likely Significant Effects (LSEs) Test determined that the only important wildlife site with the potential for a significant effect was the Ashdown Forest Special Area of Conservation and Special Protection Area.

4.4. Sadly, the work by The Woodland Flora and Fauna Group is not referred to. In 2004 they began a Phase 1 Habitat Survey which was completed in 2015. This survey collected data from every metre of countryside within Hurstpierpoint & Sayers Common Parish and created a record for the group which passed on the information to the Sussex Biodiversity Record Centre. In 2011 the group focussed on a valuable Site of Nature Conservation Importance (SNCI) within the Parish of Hurstpierpoint and Sayers Common. The area had been designated an SNCI in 1992 due to the distinctive flora that flourished there. The Habitat Survey revealed that a few of these species were still surviving but needed help badly.

4.5. In 2007 a long-term project was started to install barn owl and tawny owl boxes to assist local owl populations to survive. This has been very successful for the endangered barn owl and 80% of those in this area rely on the nesting boxes installed by the group.

4.6. In 2008/2009 a bat conservation project was embarked upon to assist the dwindling bat species in our area. The Woodland Flora and Fauna Group have mounted scores of nesting and hibernation boxes in woodlands throughout the local countryside and Bechstein's bats are now nesting in these and hunt daily in the proposed sites. Bechstein's bats are protected in the UK under the Wildlife and Countryside Act, 1981. They are a Priority Species under the UK Post-2010 Biodiversity Framework and a European Protected Species under Annex IV of the European Habitats Directive. They are also listed as Near Threatened on the global IUCN Red List of Threatened Species.

4.7. Both owl and bat projects rely on open countryside for their survival and each new area of development limits their opportunities for survival. The fragmentation and compartmentalisation of open countryside has proved through the experience of The Woodland, Flora and Fauna Group, to be very damaging to the survival prospects of these indigenous wildlife species whose local populations have been nurtured and increased through their conservation efforts spanning the last two decades.

4.8. Despite the compensatory encouragement for areas of countryside to be linked by wildlife corridors and hedgerows, these compartmental measures simply are not sufficient to sustain many of these valued species. Evidence of resulting decline has been gathered through monitoring the effects of previous development incursions. Serious attention and investigation are required to establish the full impact of the developments proposed, liaising with the local community groups who go to great lengths to conserve our local natural environment.

Duty to Co-operate

4.9. With the number of restrictions within Mid Sussex as to where building can happen, it is difficult to understand why Mid Sussex should absorb the unmet need from nearby Districts. Unfortunately, this is currently required in accordance with the National Planning Policy Framework (NPPF) Para 61:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

4.10. However, the neighbouring areas will be experiencing the same unknown demographic changes as Mid Sussex and we are in exceptional circumstances in a period of political change. Why is Mid Sussex not arguing that it cannot meet the needs in a sustainable manner and calling on neighbouring areas to take our unmet needs? In these times of food shortages why are we proposing to build unsustainable developments on valuable farming land in this District? These numbers should be carefully scrutinised.

Infrastructure

4.11. The District Plan accepts that there is a wide range of infrastructure needs across the District and this is not fully within the control of the council. Many of the sites within and around Hurstpierpoint will be dependent on a variety of public, private and voluntary sector agencies investing in further infrastructure, highlighted in the Sustainability Assessment, to meet the needs of additional housing in the countryside. Development in urban locations, especially on brownfield sites would allow the expansion of existing services to meet these needs, and give greater local employment opportunities to the new residents.

5. Chapter 5 Vision and Objectives

- 5.1. The vision of improving the social, economic and environmental well-being of our District is laudable but unachievable with the proposals for the area surrounding Hurstpierpoint.
- 5.2. Building in the countryside will increase the transport needs and have a negative impact on climate change. The identity of distinctive villages will be lost as local gaps are reduced. There will be a loss of greenspace and a reduction in biodiversity. Efficient and sustainable transport networks will only work if there are frequent and reliable services to meet all needs. Otherwise, car use will be the norm.
- 5.3. There could be a negative economic impact on Hurstpierpoint village centre if the High Street becomes more congested. There are already problems for pedestrians on the narrow pavements, particularly those with pushchairs, or using wheelchairs, or mobility scooters, making the village a less attractive place for residents and visitors.

6. Chapter 6 District Plan Strategy

- 6.1. The Plan states that there will be “growth at existing sustainable settlements where it continues to be sustainable to do so” and by promoting growth it will help town/village centres. It then explains that providing a critical mass will support viable sustainable travel solutions, but we do not believe this District Plan review can achieve this.
- 6.2. Unfortunately, unless the travel solution is frequent and reliable, together with easy connections to a large number of destinations, this will not reduce the need to travel by car. The city of Brighton and Hove manages to achieve this with a population of over 290,000 and access to 6 railway stations but building “urban extensions” in rural areas will not create the required critical mass. Therefore, reliance on travel by car will be the unsustainable solution.
- 6.3. The strategy also talks about the quality of the environment not being limited to areas recognised by National designations and the need to protect landscape, cultural and heritage assets, yet promotes building (and impacting on) an area valued for its landscape, culture and heritage.
- 6.4. Proposals to extend less sustainable communities by developing on a scale to provide the infrastructure and services will succeed to a degree but as stated in chapter 3, developing in this area based on the 20-minute neighbourhood principle is flawed due to the need to travel to access a wider base of facilities.

7. Chapter 7 Policies

- 7.1. This chapter refers to the need to read the policies within this District Plan in conjunction with national policy and other policies such as Neighbourhood Plans.
- 7.2. As stated above, national policies are in a state of flux which infers that this plan will need to be reviewed again in light of the new policies in 2024.
- 7.3. The Neighbourhood Plan finalised in February 2015 has been totally overridden especially Policy CountrysideC3 - Local Gaps and Preventing Coalescence, and Policy Housing HurstH2 and HurstH3. All the sites are located in the local gaps between Sayers Common and Albourne, and Hurstpierpoint and Burgess Hill, with numbers far exceeding the new housing total of 292. Will residents be expected to fund the writing of a new Parish Plan to make it fit with the new District Plan, at a time when there are severe financial constraints?

8. Chapter 8 Sustainability

Policy DPS1: Climate change; and Policy DPS2: Sustainable design and construction

8.1. Whilst this policy has the right aspiration to reduce carbon emissions and adopt the principle of the 20-minute neighbourhoods, building in countryside locations, away from existing services will not achieve this. These sites are on green, undeveloped land and will cause irreversible loss of valuable soil resources. Instead of protecting existing carbon sinks, building on these sites will irretrievably destroy them.

Policy DPS4: Flood risk and drainage

8.2. Site 740 is within Fluvial flood Zone 3 and apart from Site 13, all sites have areas of high surface water flood risk, as explained in paras 3.2, page 9 'Flooding (C6)' and paras 14.5, 14.6.

Policy DPS5: Water infrastructure and environment

8.3. On 31st May 2022 South East Water sent out an email asking everyone to think about water consumption. By 14th July South East Water was asking everyone to conserve water due to the very hot weather. On 3rd August the hosepipe ban for this area was announced to start on 12th August. The hosepipe ban was lifted on 2nd December 2022. That is 6 months of water supply concern, and it is not a once in a lifetime situation, but a regular occurrence.

8.4. Having abandoned its desalination plant at Newhaven some years ago and talked about a new reservoir for over two decades, South East Water has no concrete plans to increase water provision. There are "sticking plaster" solutions to prevent leaks in water pipes, but these solutions seem to be taking a long time and as one leak is repaired another one appears.

8.5. This policy states that "proposals for developments must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation." Grey water recycling should be an essential part of these infrastructure improvements, which is easier to achieve on new buildings than retrofit to existing ones.

Policy DPS6: Health and wellbeing

- 8.6. Sites 601, 799, 830, 1003 and 1026 are located in an area that currently mainly relies on car transport. A radical new public transport system, with very frequent, reliable services to local towns and areas north and south on the A23 would be needed in order to achieve this sustainable aim. Unfortunately, this would require significant public investment to make it attractive to a provider and is unlikely to be achievable.
- 8.7. The policy also refers to the possible provision of local and domestic food production, yet all sites are on land currently classed as agricultural land grades 1-3 and will be lost. This especially refers to sites 740 and 799 due to their size.

9. Chapter 9 Natural Environment & Green Infrastructure

Policies DPN1 Biodiversity, geodiversity and nature recovery; and DPN4: Trees, woodland and hedgerows

9.1. This refers to protecting existing biodiversity yet sites 601 and 740 coincide with areas of both ancient Woodland and Priority Habitats. Site 740 also contains one or more veteran trees and trees with Tree Preservation Orders. The policy also refers to offsetting “unavoidable damage” by creating new designated sites but replacing mature habitats is not achieved in a short time frame.

Policy DPN2: Biodiversity net gain

9.2. It is difficult to see how the destruction caused by building large numbers of houses on green field sites can result in a net gain.

Policy DPN3: Green infrastructure

9.3. The plan aims to create a multifunctional “Green Circle” around Burgess Hill yet site 740 is proposed within and crossing the “Green Crescent” around Burgess Hill, and in Hurstpierpoint Parish, so the integrity of this will be lost.

9.4. In 2003, the report of the panel reviewing the West Sussex Structure Plan 2001-2016, published in March 2003, in Chapter 6, ISSUE 6(iv) WEST OF BURGESS HILL, stated:

*Para 6.103 The first of these is the so called ‘green crescent’, an area of open space around the western perimeter of Burgess Hill secured when the recent expansion to the west of the town was planned. According to Mid Sussex DC its purpose, apart from recreation, is to contain and mark the limits of development. Local people, as the Greenfield Guardians and Speer Dade point out, see this as good planning and would consider it a breach of trust if it were to be lost or seriously devalued. **We agree that it would put planning in a very poor light and undermine confidence in the system if after such a short period of time an undertaking given to the community were to be seemingly cast aside.** Of course, development would not necessarily obliterate the green crescent but if it is to be truly an urban extension there is a strong case for it to be juxtaposed with the western distributor road. However, if it were to take place to the west of the green crescent then the relationship with the town would be tenuous and development would be much more akin to a new settlement with a separate identity.*

9.5. Therefore, the question must be asked why the undertaking given to the community is now being cast aside, and how long do undertakings last?

Policies DPN6: Pollution; DPN7: Noise impacts; and DPN9: air quality.

9.6. As identified in the District Council's Sustainability Assessment, Stonepound Crossroads is the only Air Quality Management Area (AQMA) in Mid Sussex. The high levels of nitrogen dioxide are attributed to the topography of the area and the volume of road traffic. The plan states that since the AQMA was declared there has been an overall reduction but the latest Air Quality Annual Status Report published by MSDC in June 2022 states:

"Since the AQMA was declared there has been an overall reduction in measured NO₂. For the fourth time in the last five years, there are no exceedances within the AQMA. An AQMA can usually be considered for revocation after three consecutive years with no exceedance, but the circumstances of the last 24 months would make any conclusions unreliable at the current time."

9.7. Stonepound Crossroads is the main crossover point in the south of the District for north-south/east-west traffic. It is used for traffic travelling from the west of this area to reach Hassocks railway station, education and health centres, and from the north and south for traffic to and from Hassocks / Burgess Hill, and the A23 / Brighton. With the additional houses already being built in Hassocks then traffic volumes will increase. With the sites planned in and around Hurstpierpoint this will further increase, especially with an emphasis on sustainable public transport, including the railways. Queuing from Hurstpierpoint to Stonepound crossroads frequently backs up to Belmont Lane, therefore, although none of the sites are within 200m of the AQMA at Stonepound, they will generate an increase in traffic through it, that will only serve to accentuate an already defective pollution hot-spot, with the effects difficult to mitigate.

9.8. Additionally, an increase in the traffic using the east-west route will increase noise and pollution, especially in the High Street of Hurstpierpoint with buildings close to the road and nowhere to bypass this area, unless there are plans not currently in the public domain.

9.9. Sites 601 and 740 are within 200m of a main road and therefore classed as high risk from noise and air pollution.

10. Chapter 10 Countryside

Policy DPC1: Protection and enhancement of the countryside

- 10.1. This states that best and most versatile agricultural land will be protected yet all the sites in and around Hurstpierpoint are Grades 1, 2, & 3. In view of the current international food supply situation following the war in Ukraine, more detailed field surveys should be undertaken on these sites looking to a future for more home-produced food.
- 10.2. Despite the words written in the Plan about individual towns and villages each having their own unique characteristics and the need to prevent coalescence, [Policies DPC2 & 3], much of this additional housing will be in the areas considered to be Local Gaps, as defined in our Parish Neighbourhood Plan, Policy Countryside HurstC3, separating settlements by areas of open countryside.
- 10.3. In 2003, the report of the panel reviewing the West Sussex Structure Plan 2001-2016, published in March 2003, in Chapter 6, ISSUE 6(iv) WEST OF BURGESS HILL, states:

Para 6108 Turning to Hurstpierpoint, the Historical Society emphasises the importance of protecting the historic setting of the village which it considers very important if the unique character here is not to be lost. We have some sympathy with this view and relate it to what we have already said about the possibility of urban sprawl in this general location. If there were to be major development here it would need to be contained well to the north of Hurstpierpoint and the adjoining settlements. This would mean locating it in the area where it will have a potentially damaging effect on Hickstead and Sayers Common. Quite clearly there are real constraints imposed by the need to protect nearby settlements and maintain the settlement pattern.

- 10.4. In this context, nothing has changed since 2003.

Policy DPC3: New homes in the countryside

- 10.5. This refers to the criteria for new isolated homes in the countryside, yet the criteria do not seem to apply to building 4,033 new homes in the countryside.

Policy DPC5: Setting of the South Downs National Park

- 10.6. This refers to the need to protect the setting of the South Downs National Park yet sites 13 and 799 are close to the South Downs National Park and likely to impact the setting of the landscape.
- 10.7. Continuity of decision-making has been lost again. The report of the panel reviewing the West Sussex Structure Plan 2001-2016, published in March 2003, in Chapter 6, ISSUE 6(iv) WEST OF BURGESS HILL:

Para 6.104 The second consideration is the visual impact of development. Views into the Low Weald are gained from the nearby South Downs; indeed one of the great attributes of the Downs is the view afforded over the adjoining countryside. Already Burgess Hill has spread westwards from its original core giving an impression of urbanisation. If it were to spread a lot further west then the perception of this area of countryside when viewed from the Downs could change significantly. This is especially so since any new development will be seen beyond the settlements on the A2116 and the whole would appear as an urban sprawl in the heart of the Sussex countryside in our opinion. At a time when the South Downs is taking on a new significance as a National Park we consider that this would be most inappropriate and unfortunate, and we take Hurstpierpoint Historical Society's point that nowhere else along the north side of the Downs is blighted in this way."

- 10.8. Therefore, all sites have the potential to significantly impact and alter the views of the countryside from the South Downs.

11. Chapter 11 Built Environment

Policy DPB1: Character and Design

- 11.1. The aim is to produce high quality, inclusive and sustainable character and design, yet it is difficult to see how sites 601, 799, 830, 1003 and 1026 cannot affect the amenity of existing nearby residents. Albourne and Sayers Common are small, isolated villages and this number of houses will have significant impact on privacy, outlook, daylight, noise, air and light pollution.

Policies DPB2: Listed buildings and other heritage assets; and DPB3: Conservation Areas

- 11.2. These policies refer to listed buildings and other heritage assets, but as previously stated, much of the traffic from the sites in Hurstpierpoint and Sayers Common will use the High Street in Hurstpierpoint, which is in a Conservation Area. It has buildings dating back to 1450 with much of the High Street built in the 1800's and designed for horse and carriage travel, not cars.
- 11.3. The Hurstpierpoint Heritage Trail produced in 2021 highlights the heritage of the centre of the village and this will lose its attractiveness if more traffic makes it more difficult to walk this trail.
- 11.4. Additionally, sites 13, 601 and 799 are in close proximity to a listed building.

12. Chapter 12 Transport

Policy DPT1: Placemaking and connectivity

- 12.1. The District Plan methodology is centred around the 20-minute neighbourhood. Paragraph 112 of the NPPF states priority should be given to pedestrian and cycle movements with access to high quality public transport. Policy DPT1 refers to this but due to the location of all 7 sites in the countryside, all will generate significant traffic. Although new pedestrian and cycle links will be created with “highway improvements and sustainable transport measures” no further details are provided. The nearest railway stations to Sayers Common are Hassocks, Burgess Hill and Wivelsfield, which all have existing traffic congestion problems during the peak periods.
- 12.2. As stated in the section on Sustainability, (Policy DPS6), a radical new public transport system, with very frequent, reliable services to local towns and areas north and south on the A23 would be needed, to reduce travel by car. How can this be done here?

Policies DPT2: Rights of way and other recreational routes; and DPT3: Active travel

- 12.3. These have the aim of encouraging walking and cycling but the DfT Decarbonising Transport report (2021) admits that 58% of all private car journeys in 2019 were for journeys under 5 miles and in rural areas this is much higher. Although highway improvements are planned around the two major sites 740 and 799, it's difficult to see how this will not result in an increased traffic flow along the existing east west route (B2116) through our High Street. It's also difficult to see how this can be improved in a High Street dating back to medieval times and already chaotic at many times throughout the day.

Policy DPT4: Parking and electric vehicle charging infrastructure

- 12.4. The Plan emphasises the need for Sustainable Development and refers to the UN 2030 Agenda for Sustainable Development but it's difficult to see how building over 2,000 houses in Sayers Common will achieve this. This will be a community heavily reliant on motor transport to access neighbouring services and work locations. Unless there is a requirement for all proposed houses to be built with solar panels and electric charging points to power electric cars or bikes, it cannot achieve the stated sustainable objective.

13. Chapter 13 Economy

Policies DPE3: Employment allocations; and DPE4: Town and village development

13.1. Although these policies refer to providing employment opportunities on land to the south of Sayers Common and supporting Hurstpierpoint village centre development, it also prioritises the regeneration and renewal of the three key town centres of Burgess Hill, East Grinstead and Haywards Heath.

Policy DPE7: Smaller village and neighbourhood centres

13.2. The Mid Sussex Retail Study Update (2022) was commissioned in September 2021 to provide an evidence base for this District Plan and highlights that Covid 19 has accelerated the trend towards online retail. Based on this, Policy DPE7 looks specifically at the important role of a range of services and facilities within village centres in providing a sense of community.

Policies DPE8: Sustainable rural development and the rural economy; and DPE9: Sustainable tourism and the visitor economy

13.3. These policies consider sustainable growth and vitality in rural economies together with sustainable tourism and visitor economy.

13.4. In the past, Hurstpierpoint has managed to hold onto a thriving High Street and although there was a turnover in the occupants and types of shops, most were occupied. We retained our Post Office when others were under threat and until 29th April 2021 during the Covid 19 pandemic, we had the Nationwide Building Society. These facilities have attracted residents and visitors into the village, even through previous difficult financial times. In September 2021 The Hurstpierpoint Society in partnership with Hurstpierpoint & Sayers Common Parish Council launched the fully interactive Heritage Trail, which has attracted more visitors into the village. The Old Flower Field lodges and camping facilities has provided new places to stay, and Washbrooks Family Farm is a visitor attraction open all year.

13.5. In order to retain these existing facilities, the village needs to retain its attractiveness to visitors and residents. Unfortunately, travelling through the High Street is very difficult at peak times, whether on foot or in a car or on the bus. Cyclists have an even more difficult time trying to negotiate the pinch point sections of the road. Although the road traffic accident records show very few accidents in the High Street this is partly due to the traffic moving so slowly that any "accidents/collisions", or the frequency of pedestrians having to squeeze against the shopfronts or boundary walls to avoid vehicles that have mounted the pavements are minor and not reported.

13.6. The number of people stuck in traffic jams with rising stress levels and vowing to avoid this route are also not recorded. To keep the vitality and viability of our village it is imperative that we do not exacerbate a volatile situation. A “desktop study” of the traffic will not have records of the “near misses” and it is imperative for the economy of this area that a more detailed survey is done during peak times so that decision makers are aware of the true, already dysfunctional, situation.

14. Chapter 14 Sustainable Communities

- 14.1. Three sites have been identified as having the potential to deliver sustainable **urban** extensions yet two of these sites in Policies DPSC1 and DPSC2, are in the rural Parishes of Hurstpierpoint and Sayers Common, and Albourne.

Policy DPSC1: Land to the west of Burgess Hill

- 14.2. This site for 1,400 new homes is referred to as an urban extension to Burgess Hill but is actually in Goddards Green and the north of the Parish of Hurstpierpoint and Sayers Common. In addition to the new homes the site includes a gypsy and traveller site, extra care housing, a primary school, self-service library, pitches and a pavilion, retail, leisure and workspace, allotments, sustainable transport measures and waste-water infrastructure. All admirable aspirations except that this is being built in the Green Crescent that was previously designated to contain and mark the limits of Burgess Hill to prevent encroachment into the countryside between Burgess Hill and Hurstpierpoint. This is an area with ancient woodland and priority habitat, valuable soil resources over a large area and partially within Fluvial Flood Zone 3.
- 14.3. The stream, Pook Bourne, which runs the entire length of the northern boundary of the site is hugely affected by a highly active Combined Sewage Overflow (CSO), crossing Malthouse Lane. This is licensed to discharge raw sewage into the stream in storm conditions, (which is an undefined parameter). On average this happens over 30 times a year. The CSOs to the West of Burgess Hill were put in locations that were never contemplated to have such a quantity of housing directly downstream from them.

Policy DPSC2: Land to the South of Reeds Lane, Sayers Common

- 14.4. This site is for 1,850 in the period of the plan but with an eventual overall total of 2,000 on "Land to the South of Reeds Lane" described as an urban extension to Sayers Common. Again, this is a rural settlement, but the site is mainly located in Albourne Parish and will result in coalescence of these two villages. It will include community facilities, extra care housing, new primary and secondary schools that may include a sixth form, "healthcare provision", and a new wastewater treatment works. This is a site in a totally rural area and will severely impact the view of the countryside from the South Downs Way in the South Downs National Park.
- 14.5. A major problem of this scale of building here lies in the flooding potential as highlighted in the Hurstpierpoint & Sayers Common Neighbourhood Plan 2015, which states:

"Most of the village lies on a level area and impermeable soils, which means that all surface water has to drain westwards through ditches and culverts in riparian ownership, passing through Twineham eventually reaching maintained main river near Shermanbury, some 3km away. At times of heavy rainfall, surface water flows rapidly from the surrounding topography towards the centre of the village. This is retained in the village, due to the inadequacy of the surface water drainage system, the lack of gradient away to the west and creates localised flooding. The surface water has the potential to inundate the foul sewerage system, thereby compromising its functioning and causing foul water flooding. The existence of 'combined' sewers which accept both wastewater and surface water sewers, could also compromise the wastewater systems in wet weather, including those affecting newer properties depending on their proximity to flood affected areas."

- 14.6. A further problem with flooding arises further away from the village when the water reaches the River Adur. There is a River Adur Catchment Flood Management Plan and flood defences have been built, but as recently as February 2020 Bramber Parish Council issued flood alerts and offered sandbags within the village of Bramber. It should be noted that the bunding along the main flood plain of the River Adur cannot be raised any higher and therefore Bramber and Upper Beeding will be at risk from further flooding without significant mitigation.

15. Chapter 15 Housing

Policy DPH1: Housing

- 15.1. The Local Housing Need for housing is 20,142 (Policy DPH1) and after allowing for the houses completed in 2020/21 and the existing permissions and allocations, provision needs to be made for 8,169 dwellings. Unfortunately, due to the restrictions of the Area of Outstanding Natural Beauty in the north of Mid Sussex, including Ashdown Forest, and the South Downs National Park in the south, this leaves a small area in which to allocate new houses and nearly 50% of those will be within, or close to, Hurstpierpoint.
- 15.2. In addition to the two major sites, (Policies DPSC1 and DPSC2) another 633 further homes are planned on extra sites in and around Hurstpierpoint:
- DPH16 - 90 at Land west of Kemps, Hurstpierpoint
 - DPH19 - 33 at Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common
 - DPH20 - 210 at Coombe Farm, Sayers Common
 - DPH21 - 100 at Land west of Kings Business Centre, Sayers Common
 - DPH22 - 200 at Land South of LVS, Sayers Common
- 15.3. These are in addition to the major building work already happening and planned for Hassocks and the Northern Arc, northwest of Burgess Hill.

Policy DPH2: Sustainable development – outside the built-up area

- 15.4. Although these sites abut previously developed land, they are currently agricultural land and include Ancient Woodland and Priority Habitats, contrary to Policy DPH2. Once this land has been damaged by building work there will be an irreversible loss of ecologically valuable soils. The choosing of these sites is developer led as all sites have been proposed by developers and some have even been previously rejected but are now deemed suitable in order to make up the numbers. Even more concerning is that these numbers are based on changing legislation and requirements, which are likely to be out of date by 2024.

Policy DPH3: Inside the built-up area

- 15.5. Locating this extra housing in rural areas will impose additional transport infrastructure requirements, contrary to Policy DPH3, and have a negative impact on our climate.

Policy DPH4: General development principles for housing allocations

15.6. The general principles for building these housing allocations are in Policy DPH4 and derived from the Sustainability Assessment discussed in Chapter 4, pages 7 - 11.

15.7. The sites in and around Hurstpierpoint are covered in the following policies:

- Policy DPH16 - Land west of Kemps, Hurstpierpoint
- Policy DPH19 - Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common
- Policy DPH20 – Land at Coombe Farm, Sayers Common
- Policy DPH21 – Land west of Kings Business Centre, Sayers Common
- Policy DPH22 – Land South of LVS, Sayers Common

15.8. Despite promising new schools and additional healthcare facilities, (Community and Cultural Facilities in Policy DP16) the timing of these will be crucial to our existing services in Hurstpierpoint. With the number of houses in Hassocks already being built and putting additional pressures on these services, at what point in the plan will these new services be built and opened? How is it proposed to staff these with medical and teaching staff when there are already problems filling these posts due to staff shortages and economic pressures?

Policies DPH26 to DPH36: Older person's housing and specialist accommodation

15.9. These policies refer to dwellings for special categories of people and their needs, all of which are needed, together with housing mixes and dwelling space standards.

16. Chapter 16 Infrastructure

Policies DP11: Securing infrastructure; DP12: Planning obligations; and DP13: Major infrastructure projects

16.1. The District Plan accepts that there will need to be significant investment in infrastructure and refer to this. The major infrastructure projects are highlighted in Policy DP13 using the general groups referred to in the Sustainability Assessment and referred to in the site assessments.

Policy DP16: Community and cultural facilities and local services

16.2. Community and cultural facilities, and local services are important and within this list are emergency and healthcare facilities. In December 2022 we are seeing and experiencing the problems with providing these services and with the increases in population already happening in Mid Sussex, combined with the increase planned, it is concerning there is very little detail about a solution. Chapter 3 identifies the pressures on these services, especially hospitals, but no details as to how these will be addressed. It would be reassuring to have more information other than "Financial contributions towards the provision of" given in the site descriptions in chapters 14 and 15. Although the actual provision of these services are outside the control of MSDC, discussions must have taken place with outside bodies as to who, where, what, when and how these service levels will be increased to meet increased demand, without a detrimental effect to existing residents.

17. Chapter 17 Implementation and monitoring

17.1. The tables in this chapter highlight how much of this plan will be implemented by Developers emphasising that this is a developer led plan.

Concluding comments by The Hurstpierpoint Society

- i. Hurstpierpoint is a special place and for the last 60 years The Hurstpierpoint Society has tried to protect the fabric and legacy of the heritage passed on to us, so it continues to be maintained and enhanced for the benefit of residents; past present and future. The proposals in this draft District Plan will not enhance the village and we need to ensure that we do not become a suburb of Burgess Hill and/or Hassocks. This may not be the Mayfield Town that has been discussed since 2012 but it will be just as bad, or even worse, as piecemeal developments will be spread over a wider area but without the centralised, substantive infrastructure in place.
- ii. Strategic town planning is being led by a need to meet housing requirements by building in rural locations, rather than a plan for economic sustainable growth centred on our existing large settlements, including Burgess Hill, where there is already existing community and transport infrastructure. Developers prefer building on green field sites rather than making use of derelict land, but higher structures can be built in towns requiring less land, making use of existing infrastructure and having less impact on our climate.
- iii. This is not a community led plan and more attention needs to be given to settlement self-sustainability. In summary, this review process is premature and evidence-based updates should wait until there is more stability in both the planning process and demographics.
- iv. In view of the points raised in this response, we ask you to reconsider the proposals for the sites in Hurstpierpoint and the surrounding area to avoid long term damage to our natural and built environment.