



25th October 2019

Dear Councillor 

As the process of selecting sites for your District Plan review draws to a close, you may at some stage in the next few months be given a choice between different sites for inclusion in the plan. At present Mayfield Market Towns (MMT) remains under consideration by your planning team, despite it being totally rejected previously by Geoff Salter, the examiner of Horsham's 2015 District Plan, who having devoted a whole day to the subject, finally stated in his report amongst other things;

*'To my mind significant concerns have been raised about the sustainability of the location of the MMT site, in particular its distance from railway services and the strategic road network'*

Whilst MMT's proposals may appear attractive, promising 'a vision' for a new settlement of up to 7,000 houses in the South of the District, they fail to mention that after 7 years, they have been unable to address any of the issues identified by the inspector, or by your planning team. It is extremely unlikely any plan that includes MMT will be found sound, and there are many parties that will be arguing that should be the case. We imagine that with the issues experienced at the site at North Horsham, you will be ill advised to support a scheme that will undoubtedly be even more problematic for the Council.

LAMBS is not anti-house building; we simply believe that new homes must be built in the best and most sustainable locations. LAMBS together with the local Members of Parliament, and the Inter-Parish group, made up of 17 parishes, know this is simply the wrong place, negatively impacting on a vast area over 50 times greater than the site itself, including neighbouring authorities, and totally at odds with HDC's climate promises over housing.

Local fundraising has enabled us to seek legal advice (at QC level) and expert planning advice. We have also been able to commission professional reports which we will be sharing with your senior planning officers later this month, as we did in 2015.

The key issues identified in our reports are as follows:

### Land Control

LAMBS can show that at least 50% of the MMT 'red line' site is not under their control, and we believe a large percentage of the remainder under option is due to expire, and landowners may not renew. We understand MMT has shown no proof of land control, and officers have received correspondence from landowners demonstrating that a significant part of the site is not available to them now, or in the future. Compulsory purchase orders would therefore need to be used to bring this site forward, which would cause severe delay, and be extremely controversial. A Planning inspector is unlikely to support this site if other strategic sites are not similarly impeded.

### Flooding

Planning regulation is clear that sites should be selected in declining order of flood risk. The area is only 2-3 metres above sea level with many ponds and water courses, which two separate reports confirm is also subject to surface water flooding, exacerbated by any significant rainfall. The river Adur floods annually, which is expected to become more frequent as approved large developments are built out in Burgess Hill. In addition, the reports highlight that removal of treated wastewater will create further flood risk on the (tidal) River Adur, both locally and downstream.

### Traffic

LAMBS' comprehensive traffic report confirms the Inspector's concerns, that MMT's development would be built in an area that is fundamentally unsustainable in transport terms. The local highways network already operates at close to or above capacity, and the additional traffic and trips generated by the proposed development would contribute towards severe congestion at several junctions and links, including the A23, A23/A2300 and AQMAs at the Cowfold double-mini roundabout, and Stonepound crossroads. The proposal also has no rail link or proposed access to rail services.

## Ecology

Our ecologist maintains that MMT's claim for an increase of 10% in biodiversity is unrealistic as the site is traversed by 3 water courses, has 28 lakes and ponds, a wetland area and floods annually – all factors which increase the biodiversity of an area. Our report shows a development of this scale, in this biodiversity rich area, will cause irreparable damage, regardless of any mitigation.

## Visual impact and Landscape

Our report states that the development of MMT's site would have a significant adverse impact on the setting of the South Downs National Park, especially from John Constable's 'Grandest views in the World' on Devils Dyke. The report considers the area to be well above 'ordinary' countryside, with demonstrable physical attributes and identified qualities valued in published landscape assessments, including your own 'Horsham District Landscape Character Assessment'.

## Viability

Many of MMT's costs are totally unknown including; land assembly; burying of high voltage power lines; water management (flooding and wastewater treatment); and transport. Deliverability and developability are the key to any allocation of this scale, and to rely on a company to deliver a 'New Market Town', who have never built anything, with diminishing assets, having spent an inordinate amount of money over the past 7 years trying to force the Councils to support its proposals, would be unwise. The fact that over that long period, they have been unable to solve any of the identified issues, or even to control the land they are promoting, proves that this is simply not a viable or realistic proposal.

Many of these points were identified in Horsham's own Housing Assessment (the SHELAA) published in December 2018 which said:

*'The Site is in multiple land ownership, which may affect deliverability'*. Compulsory purchase will be required for up to 50% of the site from multiple landowners.

*'There would also be a need for cross boundary working, with MSDC and with WSCC'*. MMT

has significant negative implications for Mid Sussex, who rejected it again in 2019 during their DPD work, and the South Downs National Park Authority are also likely to be required to oppose its inclusion in any plan.

*'The site has a range of environmental and infrastructure constraints including an area of flood risk that would require mitigation'.* We believe that the cost of mitigating these issues, if indeed possible, will fundamentally compromise the scheme's financial viability.

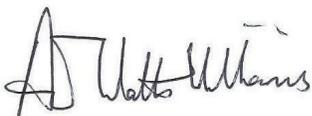
*'Improved connectivity to the trunk road and rail network (which is some distance away) would also need to be carefully considered'.* This issue has not been addressed.

*'Any major development would also need to take account of the retail viability of existing settlement such as Henfield'.* The Parish Council and residents of Henfield believe that the MMT development would have enormous long-term negative impacts on the village and coalescence is inevitable.

We realise that all large strategic sites are likely to be controversial, and HDC have a significant challenge to meet the housing numbers required. We hope that we have been able to demonstrate that whilst your planning team will be professionally analysing all the sites, they must by now be aware of all the significant issues of the MMT site, which cannot be overcome however much additional work is done, or money is spent.

Whilst we accept that Horsham's planning officers are required to work with MMT under the terms of the PPA, we believe that after nearly a year, the evidence must show, as it did in 2015, that this is not a sustainable, deliverable site, and should be discounted as soon as possible. This would allow officers to concentrate on sites that are deliverable, in sustainable locations, and promoted by recognised developers with a track record of delivery, who either control or own the land.

Yours sincerely,



On behalf of the LAMBS Committee