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1st November 2019

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Barbara Childs  
Head of Place  
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Dear Barbara,

We understand from your officers that the review of Horsham's 2015 District Plan, in terms of choosing sites for inclusion, is nearing an end. Your own need under the government standardised formula, together with any 'unmet need' that you feel can sustainably be met in the Horsham District, is clearly going to be both challenging and keenly debated at the EIP, when the Plan goes before a planning Inspector.

As you will be aware, LAMBS (Locals Against Mayfield Building Sprawl) represent thousands of Horsham District's residents, and residents of neighbouring authorities, who live, work and 'play' in the Sussex Low Weald, in and around the area being promoted for development by Mayfield Market Towns (MMT). Those people, together with 17 Parish Councils and the local Members of Parliament, firmly believe that MMT's proposals for a 'new market town' in this area is completely unsustainable, and if allocated would devastate both the rural environment, rural economy, and numerous communities over a very large area.

We all believe that this is simply the wrong place for a new settlement, which has 'landed' here by default, and certainly not for any good planning reason or need. We therefore feel duty bound to bring forward the views of the community and hopefully assist the Council in their deliberations, as we are all ultimately seeking the same goal; a robust adopted local plan for Horsham.

Whilst the numbers issue is something you will be considering in great detail; it is worth noting when you are considering the 'unmet need' the comments by the Inspector of your 2015 District Plan:

*"I remain unconvinced of any considerable degree of overlap between the NW Sussex HMA and that of the coastal authorities to the south. The needs of Brighton and other nearby coast towns arise from the strong migratory pull of those wishing to live in a town by the sea; these pressures are not the same as those generated by smaller inland towns or rural communities. Although HDC have continued constructive dialogue with Brighton and Hove Borough Council, there has been no objection to the HDPF or firm indication of how many dwellings might be required to fulfil unmet needs there".*

Housing delivery has been strong in 2018, but the impact of North Horsham delays may threaten future delivery, and your 5-year housing land supply. If that is the case, that could potentially be mitigated by a stepped housing trajectory as demonstrated in the adopted 2018 Mid Sussex District Plan and the 2016 Brighton & Hove City Plan Part One.

LAMBS believe that the Mayfield Market Town (MMT) proposal is not proportionate to local need, not sustainable, not deliverable; unlikely to prove viable when full costs are considered; would be rejected by an Inspector; and that HDC do not need this development to establish a sound plan. The importance of local support in proposals for new settlements is clearly outlined in the National Planning Policy Framework and this scheme not only lacks local support but in fact faces significant local opposition. It also has challenges over and above those experienced in North Horsham, which creates very high risk. To assist the Council in its consideration of sites to be allocated in the updated Horsham District Planning Framework, LAMBS have compiled this report with the assistance of Enplan and Leading Counsel to explain why.

LAMBS believe that Councillors owe a duty of care to residents to ensure that steps are taken to protect them from the continued blight and anxiety arising from the persistent promotion of the site by the developer MMT; and urge that the District Plan considers policies or other approaches that mitigate this.

We believe that this report clearly demonstrates:

1. The site is undeliverable. The landowner map at Appendix A of the report demonstrates that MMT do not control over half the site, which cannot be coherently developed. We believe that the promoters own only approximately 11 hectares of the total 330 ha site, and that options signed some time ago are due to expire. Given this, and MMT's refusal to explain land control in 2015, the Council should discount any of MMT's statements on land control unless they have been shown legal title that will persist to completion of planning beyond 2022. A phased delivery cannot be considered in the absence of satisfactory plans for the whole site; a timetable would be needed which takes account of the significant infrastructure required, much of it outside of the site and outside Horsham District, and clarification on what steps would be required to establish the powers for site assembly and delivery, including compulsory purchase. Whilst LAMBS do not have access to MMT's proposals at present, it

is also anticipated that the scheme will ultimately fail the NPPF viability tests due to related infrastructure costs such as; additional roads on and off site; burying of HT pylons; wastewater treatment and flood mitigation, amongst others things.

2. If developed, the impact on the local area would be unacceptable and disproportionate to any perceived benefit. The map at Appendix B of the report shows the Parishes that form the Inter Parish Group, all of whom believe that MMT would negatively impact their community. This reflects an area which is more than 60 times the size of the MMT proposed site making the community impact totally disproportionate to the benefit of providing additional housing. This impact is further detailed in the points below.
3. The site's location is totally unsustainable, as it is distanced from the strategic road network and rail connections with the only access through key Air Quality Management sites at Cowfold and Stone Pound Crossroads. The claim by MMT that the site will be "self-contained" has no precedent and the proposed space configuration is questionable. If it worked, the concept could be freely re-located to controlled land in a less sensitive area. 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 unless extensive mitigation is clearly set out. The feasibility of necessary junction improvements and the provision of a link road has not been examined adequately or at all. The promoters have not provided any evidence in this regard and unsubstantiated assertions are not sufficient. The majority of the transport burden would fall on Mid Sussex who rejected MMT in their recently adopted District Plan. As a result of this, as well as the conflict with MSDC's Northern Arc development, it is highly likely that MSDC would formally object to any HDC Plan that included the MMT site and would not support a link road in its District.
4. The proposed site is in an area prone to flooding. The NPPF sequential flooding test should ensure that the site is one of the last to be considered by the Council, and the detailed flooding work that has been completed by LAMBS consultants highlight the nature of the eastern Adur; the inability to manage additional waste water and run-off arising from MMT and the Northern Arc development; the untested performance of SUDS at sea level and tendency to silt up; and potential climate impacts from the rise in sea levels, given that the Adur is tidal up to Albourne, and increase in weather events indicate that the sites challenges will only worsen in future.
5. The site is sensitive for a range of environmental and ecological reasons. It sits under the South Downs National Park (SDNP) and, as highlighted by the Visual Impact survey (attached and referenced below), it would have significant impact in both daytime and night-time views where such a scale of development would damage the SDNP's "dark skies". It would impact on both the Park and

local nature; and could lead to increased traffic on the Saddlescombe Road. It is likely that SDNP Authority would formally object to any HDC Plan that included the Mayfield site. In relation to Ecology, the Wildlife Splash report identifies 16 red-listed and 29 amber-listed bird species as well as a number of other protected species on the site including reptiles, bats and invertebrates (previously MMT claimed that no protected species were affected). The report also highlights the importance of the wildlife corridors from the North Downs to access the South Downs that exist west of the A23.

6. MMT would destroy Henfield; other local village communities and significant community amenity which HDC and the Parishes are looking to develop. MMT have publicly acknowledged that the proximity to Henfield means that “it would become a suburb”. In addition, Mayfield would destroy successful and nationally recognised businesses such as the Prairie Gardens and Blacklands Farm; and remove areas used by a number of outdoor recreational clubs from Brighton and the local area.

In 2013/15 MMT made representations to the HDPF and following Examination, the Inspector concluded in October 2015 that the MMT proposals were unsustainable. All that has changed since then is that the residents of the area have been blighted by these proposals for 4 more years. Since 2013 MMT have misinformed residents to seek to gain control of options over land, and have had advertisements censured by the Advertising Standards Authority (ASA). They have undermined Horsham District Council through a misleading survey in 2015; and leafleting of homes in North Horsham which has caused unnecessary unrest.

In 2019 the promotional material remains fundamentally misleading and they have indicated their intention to submit a planning application to Horsham District Council, even if the site is not allocated, in an attempt to pressure the Council to support the scheme. Leading Counsel has expressed a view that if the site is not allocated or otherwise supported by up to date policy in the Local Plan any application for planning permission would face the real issue of being contrary to the fundamental policy and legal principles that underpin a plan led system. Planning law requires applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.

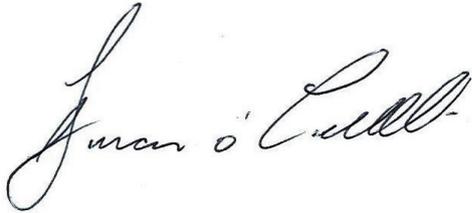
MMT continues to promote this entirely unsuitable site in spite of significant local opposition. The primary obligation that Horsham District Council have is to their residents, and to include in their spatial strategy a recognition of the value of the land and so establish that this area (as with others in Horsham and Mid Sussex) should be respected for its rural character and not considered for any significant strategic development that might affect it.

As we stated at the beginning of this letter, LAMBS’ aim is to work with District Councils to meet their housing obligations and recognises the challenge this creates. It also recognises the Council’s need to be totally impartial towards MMT to prevent them

(or any other developer) taking legal action against the Council for failing to properly consider their proposals. However, it also appears that (aside from the questionable promise to build houses on land it does not own, with money it does not have, in an untested scheme) MMT can provide no exemplar positive planning outcome for Horsham District Council, other than that it is located in the South of the District which may be politically expedient.

We recognise that we have provided your team with some significant, and we hope helpful, material and would hope to have the opportunity to answer any questions you might have at a meeting in the coming month. We will contact Catherine Howe to arrange this and if you have any questions, or there is any further detail that you require in the meantime, please let us know.

Kind regards,

A handwritten signature in black ink, appearing to read "Brian O'Connell". The signature is written in a cursive style with a large initial 'B' and 'O'.

Brian O'Connell.

On behalf of the LAMBS Committee.