



WELBECK LAND

# Planning Statement

Outline Planning Application  
Land at Coombe Farm, Sayers Common



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17/3678

## Executive Summary

This Planning Statement has been prepared by Planning Potential on behalf of Welbeck Strategic Land II LLP ('Welbeck Land'), hereafter referred to as 'the Applicant'. It supports an outline planning application, with all matters reserved except for means of access, for Land at Coombe Farm, Sayers Common.

Specifically, outline planning permission is sought for –

*“Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space; drainage and associated works.”*

Turning to the proposals themselves, they provide a number of significant benefits, which sit neatly in line within the core planning principles of the National Planning Policy Framework and the draft District Plan Review. These are set out in turn below.

The proposals will secure a range of planning benefits, including:

### Economic Objective

- Creation of job opportunities, both during construction and management stages.
- Injection of S106 contributions into MSDC.
- Expenditure in the local community by future occupants of the scheme.

### Social Objective

- Creation of up to 210 dwellings, including a policy compliant level of affordable housing.
- The provision of a range of unit sizes and types, extending the choice of housing in Sayers Common.
- Creation of family housing.

### Environmental Objective

- Sensitively designed development that respects the setting of nearby heritage assets.
- Promoting active travel through new pedestrian and cycle connections within the site and beyond.
- The incorporation of biodiverse areas of planting, street trees and landscaping, and the enhancement of existing natural features on the site, puts the natural environment at the heart of the scheme.
- Biodiversity net gain of 18.85% (habitat units) and 18.22% (hedgerow units).
- Promotion of sustainable active transport options.
- Use of sustainable drainage systems.
- Application of the energy hierarchy

The design and layout approach which has informed the illustrative masterplan and parameter plans subject of this outline application has been progressed in full coordination with the technical consultant team and has taken into consideration the site's opportunities and constraints from the outset. The approach has been led by landscape and visual considerations with careful attention given to the location and layout of the proposed housing, infrastructure and open space with regards to the conservation of landscape character, visual amenity, heritage, arboriculture and ecology.

The proposals have been developed through collaborative and ongoing discussions with key stakeholders such as MSDC (including urban design) and WSCC, alongside engagement with other draft housing allocations within Sayers Common through an iterative masterplanning approach. Full details are provided within this Planning Statement and Statement of Community Involvement.

## 1. Introduction

1.1. This Planning Statement has been prepared by Planning Potential on behalf of Welbeck Strategic Land II LLP ('Welbeck Land'), hereafter referred to as 'the Applicant'. It supports an outline planning application, with all matters reserved except for means of access, for Land at Coombe Farm, Sayers Common.

1.2. Specifically, outline planning permission is sought for the following –

*“Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space; drainage and associated works.”*

1.3. Welbeck, established in 1993, is a strategic land promoter, master planner and master developer, that is committed to creating value driven outcomes for landowners and local communities, working in partnership with a range of stakeholders to ensure that they successfully plan for and create beautiful homes and places that are embedded in sustainability and a positive legacy.

1.4. A request for the Local Planning Authority (LPA) to form an opinion as to whether the proposed development amounts to Environmental Impact Assessment (EIA) development was submitted under ref: DM/25/1934. The LPA confirmed on 5<sup>th</sup> September 2025 that the proposals do not constitute EIA development.

1.5. A suite of supporting documents is submitted in support of the proposals:

- Application Forms and Certificates (Planning Potential);
- Air Quality Assessment (Create);
- Bat Activity Survey 2024 (Ecology Partnership);
- Contaminated Land (Create);
- Drawing Pack (Pegasus);
- Design and Access Statement (Pegasus);
- Dormouse Survey Report 2024 (Ecology Partnership);
- Ecological Impact Assessment (Ecology Partnership);
- Energy and Sustainability Assessment (Create);
- Flood Risk and Sustainable Urban Drainage Assessment (Paul Basham Associates);
- Heritage Impact Assessment (Orion);
- Landscape Design and Access Statement (Scarp);
- Landscape Illustrative Masterplan (Scarp);
- Landscape and Visual Impact Assessment (Scarp);
- Lighting Scheme (Create);
- Noise Impact Assessment (Create);
- Planning Statement (Planning Potential);
- Preliminary Ecological Appraisal (Ecology Partnership);
- Reptile Presence/Likely Absence Survey 2024 (Ecology Partnership);
- Statement of Community Involvement (Communications Potential);

- Transport Assessment (Paul Basham Associates);
- Travel Plan (Paul Basham Associates);
- Utilities Statement (Create).

1.6. The structure of this Planning Statement is as follows:

- Introduction
- Site and Surroundings
- Pre-Application Engagement and Consultation
- Application Proposals
- Planning Policy Context
- Principle of Development
- Technical Considerations
- Summary and Conclusions

1.7. This Planning Statement details the proposed approach to development and assesses the proposals against national and local planning policies. This report should be read alongside the full suite of technical studies and reports and drawing pack, which support this application.

## 2. Site and Surroundings

- 2.1. The site is a comprehensive land parcel of 13.4 hectares (ha), and comprises undeveloped greenfield land that includes Coombe Wood, an area of Ancient Woodland. It should be noted that Stonecroft (dwelling in the centre of the site) does not form part of the redline boundary.
- 2.2. The Site Location Plan is illustrated below in Figure 2.1 for ease.

**Figure 2.1 Site Location Plan**



Source: Pegasus

- 2.3. The land parcels are near to the built-up area boundary of Sayers Common, a small village to the west of Hurstpierpoint and Burgess Hill. To the north of the site is the settlement boundary of Sayers Common, to the east is the A23, to the south is open countryside and to the west is the B2118 and residential properties on Furzeland Way.
- 2.4. This site is in a sustainable location and is conveniently within walking distance of several key amenities. Albourne CoE Primary School is a 15-minute walk or a 4-minute cycle away. The Village Hall Community Shop is a 5-minute walk or a 1-minute cycle away. A public house is just a 3-minute walk or a 1-minute cycle away. The community centre/village hall is a 5-minute walk or a 1-minute cycle away. Employment areas to the west are within a 5-minute walk. The Berrylands Playing Fields are a 10-minute walk or a 3-minute cycle away.
- 2.5. Hurstpierpoint is also accessible within a 30-minute walk or a 7-minute cycle ride, with most of the route being on a Public Right of Way. Additionally, bus stops adjacent to the site on the B2118 provide an hourly service linking Sayers Common to Burgess Hill, Henfield, Steyning, and Pulborough. Additional school services connect to Downlands Community School in Keymer during the term.
- 2.6. There are two existing public rights of way which run through the site. The 86 Hu Bridleway runs east-west through the middle of the site. The other Public Right of Way is the 34 Hu Footpath which runs north-south through the southern parcel of the site. Moreover, the B2118, which runs parallel to the site, is equipped with footpaths. These footpaths create a safe and convenient walking route from the site to the centre of the village. This means that residents and visitors can easily walk from the site to the village centre. The presence of these public rights of way and footpaths significantly enhances the accessibility and connectivity of the site, making it a well-connected and pedestrian-friendly location.

- 2.7. The site is not located within a Conservation Area, nor does it contain any listed buildings. However, Coombe Farm, which is situated just outside the site boundary, includes three Grade II listed buildings. As a result, the site falls within the setting of this heritage asset.
- 2.8. The site falls outside the High Weald Area of Natural Beauty (AONB) and South Downs National Park which cover large swathes of the district
- 2.9. The site is located within the Brick Clay Resource Consultation Area.
- 2.10. The site is located in Flood Zone 1.

### 3. Pre-Application Engagement and Consultation

- 3.1. The outline proposals have evolved through an iterative pre-application process with MSDC. In total, two pre-application meetings were undertaken, a summary of which is provided below.
- 3.2. Alongside the pre-application process, the Applicant has engaged extensively with the emerging Draft Development Plan process which is discussed in further detail in Chapter 5 of this Planning Statement.

#### Pre-Application 2024

- 3.3. A pre-application request form was submitted under ref: DM/24/2119 on 30<sup>th</sup> August 2024, alongside the following material:
- Covering Letter
  - Pre-Application Statement
  - Site Location Plan
  - Vision Document
  - BNG Metric and Statement
  - Ecology Walkover
  - T-junction Drawing
  - Heritage Desk-Based Assessment
- 3.4. A pre-application meeting took place on 9<sup>th</sup> January 2025, and written comments were received from MSDC on 14<sup>th</sup> February 2025.
- 3.5. Tabel 3.1 below provides an overview of MSDC's comments and the Applicant team's response.

**Table 3.1 Pre-Application 1 Overview**

Matter	MSDC Comments	Scheme Response
<b>Principle of Development</b>	The formal adoption of the District Plan will, as set out in its current draft form, establish the principle of the development of the site.  Paragraph 11 tilted balance is engaged on housing applications.	Noted.
<b>Masterplanning</b>	There is a need for a co-ordinated approach to all the proposed Sayers Common sites both in terms of masterplanning and the timely delivery of necessary infrastructure. Importantly, the application will need to demonstrate how this is being achieved.	Noted.
<b>Design</b>	Proposed layout fails to accord with a number of key principles from the Mid Sussex Design Guide and further development of the Illustrative Masterplan is required. The previously presented layout from 2021 (included in the 'Update Walkover & Site Review' document, was considered to be more successful, especially in terms of legibility, street definition, and in particular how 2021 layout employed carparking solutions	Pegasus have worked in close collaboration with the wider technical team including drainage, ecology, arboriculture, heritage and highways, to review and address the comments where possible, through amendments to the Illustrative Masterplan. To inform the amendments to the Illustrative Masterplan, Pegasus undertook a Character Study. An overview of key amendments is provided below: <ul style="list-style-type: none"> <li>• Amendments to the access and layby locations, in accordance with highway feedback</li> <li>• Adjustments to the location of buildings away from root protection areas, following the overlay of the tree survey</li> </ul>



		<ul style="list-style-type: none"> <li>• The apartment blocks now front onto the central public open space, creating a greater density and stronger character area</li> <li>• The play space is more centrally located with greater surveillance accessible directly from the primary street</li> <li>• Amendments to the location and orientation of dwellings</li> <li>• Previously proposed pedestrian link to the north-east corner of the site has been removed</li> <li>• Amendments to parking arrangements</li> <li>• Relocation of drainage basis to the lowest points on the site, whilst also preserving the existing public rights of way.</li> </ul>
<b>Affordable Housing</b>	30% affordable housing, split 25% First Homes / 75% social rent or affordable rent housing, will need to be included within each and every phase.	Noted.
<b>Heritage</b>	The proposals will cause less than substantial harm to all of the designated assets within the farmstead, this being around the mid-upper end of that scale. Recommends that consideration should be given to appropriate mitigation measures which may help reduce the level of harm.	Our appointed heritage consultant, Orion, is in agreement with Officers that the proposals are likely to result in less than substantial harm. Under paragraph 215 of the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal and this balance is set out in this Planning Statement.
<b>Highways</b>	<p>Pleased to note that the Applicant has taken up the opportunity to engage with WSCC on highways matters.</p> <p>Applicant should be ensuring a coordinated approach is taken to the proposed access alongside the promoters of DPSC3.</p> <p>Acknowledged that the pre-application should include comments from the Public Rights of Way team as the impact on those routes within the site will be an important consideration. MSDC's understanding is that these routes through the site will not be diverted, but some changes to their surfacing will be required to help enhance pedestrian connectivity and permeability. Noted that a footpath link will not be forthcoming in the north-east corner given this could only link to private land.</p>	<p>Our appointed transport and highways consultant, Paul Basham Associates (PBA) have held constructive dialogue with WSCC Highways who have confirmed they are happy with the scope of assessment.</p> <p>PBA have also confirmed the principle of access, both pedestrian and vehicular, to ensure the proposals accord with the draft policy requirements and can deliver a coordinated approach between our site and DPSC3 to the west. Specifically on vehicular access, following updated Surface Water flood mapping, we have revised our access and have agreed this revised design with WSCC Highways, within which potential arrangements for access into DPSC3 have been considered and allowed for as appropriate to ensure we can deliver a coordinated scheme.</p> <p>The public rights of way team have not commented as part of the pre-application; however, WSCC Highways officers have provided holistic advice on the PRoW, including how the internal road crossing the Bridleway should be approached.</p> <p>The remainder of PBA's scope is in accordance with WSCC Highways response including any offsite works and forms part of the application documents.</p>
<b>Biodiversity</b>	BNG is applicable. An application should be supported with the necessary information to support	Application is supported by full suite of relevant species surveys, BNG Metric and BNG Statement.

	<p>this along with a full set of the relevant species survey.</p> <p>The importance of the surrounding ancient woodland was acknowledged and the need to clearly justify any development within a 15 metre buffer zone.</p>	
<b>Drainage</b>	Matter would be assessed through the application submission.	Noted.
<b>Sustainability</b>	Matter would be assessed through the application submission.	Noted.

Source: Planning Potential Research

### Pre-Application June 2025

3.6. A follow-up pre-application was submitted under ref: DM/25/1477 on 6<sup>th</sup> June 2025. The following material was submitted:

- Covering Letter
- Illustrative Masterplan
- Urban Design Comment Response
- Drainage Technical Note

- 3.7. Officers considered that the proposals were “hugely improved”, with the streets now well-defined and parking solutions resolved.
- 3.8. Officers requested an indicative lighting scheme. Accordingly, the Applicant has appointed Create to prepare an indicative lighting scheme which is submitted in support of this application.
- 3.9. The Applicant has taken on board all feedback received during the pre-application process in the preparation of the final submission proposals, and will continue to liaise with MSDC following the submission of the outline application.
- 3.10. Written comments were also received from the Ward Cllr as part of pre-application discussions.

### Community Engagement

- 3.11. The programme of engagement included direct engagement with 3,416 households through a six-page community newsletter, supported by a dedicated website, email address, and telephone number to provide residents with clear and accessible ways to find information and share feedback.
- 3.12. Although significant efforts were made to reach the local community, only 24 formal responses were received. All of the issues raised—ranging from traffic and infrastructure capacity to the impact on local services, character, and environment have been carefully considered as part of the development proposals.
- 3.13. The Applicant and project team remain committed to maintaining open and transparent dialogue with MSDC, parish councillors, residents, and stakeholders throughout the planning process, ensuring that community views continue to help shape the proposals as they evolve.
- 3.14. Please refer to the Statement of Community Involvement (SCI) prepared by Communications Potential which is submitted in support of this planning application.

## 4. Application Proposal

4.1. This outline planning application seeks planning permission for:

*“Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space; drainage and associated works.”*

4.2. Figure 4.1 below identifies the Illustrative Masterplan.

4.3. The residential provision will comprise up to 210 new homes, including a policy compliant level of affordable housing, responding to planning policy and local need. The specific quantum of housing and unit mix will be determined at reserved matters stage in due course.

**Figure 4.1 Illustrative Masterplan**



Source: Pegasus

4.4. Further details are set out in the submitted Design and Access Statement, prepared by Pegasus.

## Open Space, Green Infrastructure and Play Space

- 4.5. To distinguish between the different landscape treatments, the site is divided into a series of landscape character areas which can be summarised as follows:
- Woodland Fringe
  - Green Open Space
  - SUDs and Streetscape
  - Green Streetscape
  - Private Amenity
- 4.6. These present an opportunity to create spatial variety within the site and work to create a vibrant and green streetscape for both residents and visitors.
- 4.7. The central open space will form the heart of the development, with communal features to offer recreation, formal and informal play, and growing activities. This will provide residents with a social and interactive landscape in which they can spend quality time, gather together, and hold events. In addition, the landscape will offer biodiversity benefits, with large amounts of species rich grass areas and wildflower meadows, and existing vegetation such as mature trees and hedgerows will be retained where possible. Vegetated rain gardens or swales can be incorporated into the main residential avenue, to sustainably manage surface water run-off from the street and other hard surfaces.
- 4.8. The hard landscape materials used will be robust and hard wearing and of a quality appropriate to the site.
- 4.9. The proposed play strategy aims to provide a central play space with a variety of play opportunities for all ages. The play offerings will be timber elements to link in with the naturalistic character of the site. Where suitable, play on the way features will provide play interest for young children along main footpaths in the open space. In addition, open amenity lawn provides flexibility for both play and community uses.
- 4.10. The SUDs strategy proposed will use attenuation ponds to retain surface water runoff and then discharge it at a controlled rate to match the pre-development greenfield QMED.
- 4.11. Figure 4.2 below sets out the proposed green and blue infrastructure.



Figure 4.2 Green and Blue Infrastructure



Source: Scarp

- 4.12. Further details are set out in the submitted Landscape Design and Access Statement, prepared by Scarp, and will come forward through the reserved matters in due course.

#### Transport and Highways

- 4.13. Vehicular access to the site will be via a new standard priority junction measuring 6m in width with 12m radii either side of the carriageway. Two-way vehicle tracking has been completed at the proposed access point highlighting that two private cars are able to pass each other without conflict.
- 4.14. The proposals identify a number of pedestrian links to and from the site which utilise some of the existing footpaths and bridleways which run through the site. The existing bridleway 86Hu will remain and provide a footpath/cycle link from the west of the site and south of the proposed vehicular access through the site and connecting to the east towards Hurstpierpoint. The bridleway will retain access to Coombe Barn and Stonecroft.
- 4.15. Internally, a new pedestrian connection will be provided at the north-west of the site connecting the existing footways alongside the B2118 with the internal pedestrian connections. Details of these internal links will be finalised as part of future reserved matters

applications, however the masterplan sets out the principles of internal permeability for pedestrians internally to the site to encourage sustainable travel.

## 5. Planning Policy Context and Draft Site Allocation

5.1. The UK Planning System has a plan-led approach. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that:

*"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".*

### Adopted Development Plan

5.2. The adopted Statutory Development Plan comprises the following:

- Mid Sussex District Plan (2018);
- Site Allocations DPD (2022);
- Hurstpierpoint and Sayers Common Neighbourhood Plan (2015); and
- Policies Map.

### Emerging Development Plan

5.3. Representations were made to the Call for Sites consultation, on behalf of the Applicant, in 2021.

5.4. The Draft Mid Sussex District Plan 2021-2039 – Regulation 18 2022 consultation was held between 7<sup>th</sup> November to 19<sup>th</sup> December 2022. Representations were made to the consultation, on behalf of the Applicant, which were submitted on 19<sup>th</sup> December 2022.

5.5. The Council approved the Submission Draft District Plan (Regulation 19) document on 13<sup>th</sup> December 2023. The Submission District Plan 2021-2039 was published for Regulation 19 consultation between the 12<sup>th</sup> January and the 23<sup>rd</sup> February 2024. Representations were made to the consultation, on behalf of the Applicant, which were submitted on 20<sup>th</sup> February 2024.

5.6. The District Plan 2021 – 2039 was submitted for Examination on 8<sup>th</sup> July 2024.

5.7. The site benefits from a draft allocation under DPSC5: Land at Coombe Farm, London Road, Sayers Common, as part of a wider Sustainable Community. The site was allocated for the following:

- 210 dwellings
- On-site Informal outdoor space
- Financial contributions towards the provision of:
  - Sustainable Transport
  - Improvements at Hassocks Station
  - Education
  - Library
  - Community buildings
  - Local Community Infrastructure
  - Emergency Services
  - Health
  - Play area
  - Other outdoor provision
  - Outdoor sports

- Provision of:
  - Sustainable transport measures
  - Highway works
  - Sewerage network upgrades

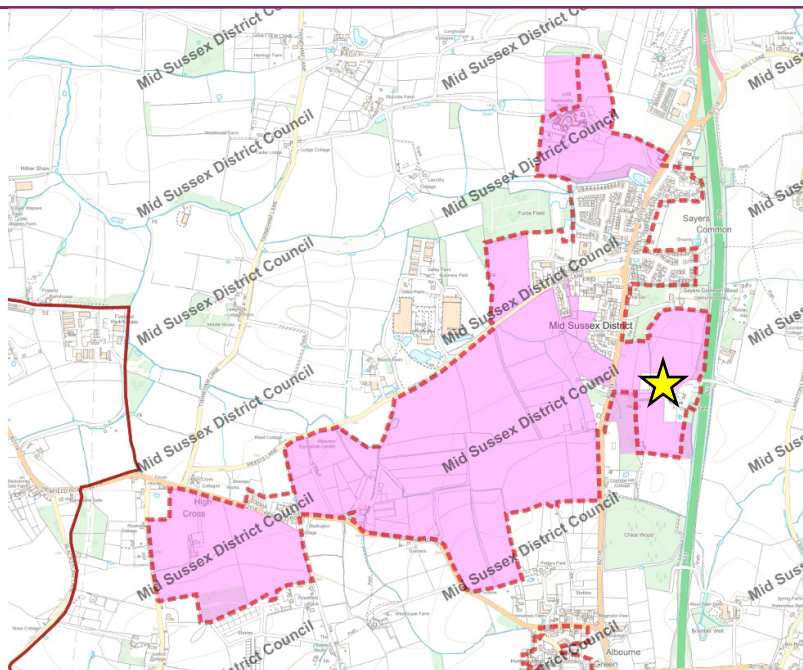
5.8. The draft policy requirements under DPSC5 are as follows:

1. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections, and includes enabling the viability of new public transport services.
2. Prioritise pedestrian and cycle access throughout the site linking to Significant site allocation DPSC2 and bus stops on the B2118 to the west and provide suitable access onto the B2118.
3. Integrate and enhance the existing PRow which cross the site.
4. Informed by a Heritage Impact Assessment, provide a layout and design which preserve the setting of nearby Grade II listed buildings, Coombe Farmhouse, Granary, and Barn at Coombe Farm.
5. Address impacts associated with areas of ancient woodland both on and adjacent to the site.
6. Follow a sequential approach by directing development away from areas of flood risk associated with the site.
7. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.
8. Provide good acoustic design to address noise impacts associated with the adjacent A23 to the east.
9. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
10. Address any impacts associated with the brick clay (Weald) Minerals Safeguarding Area.
11. Meet the requirements of other relevant development plan policies.

5.9. Figure 5.1 below illustrates the site (marked with a star), in the context of the wider Sustainable Community.



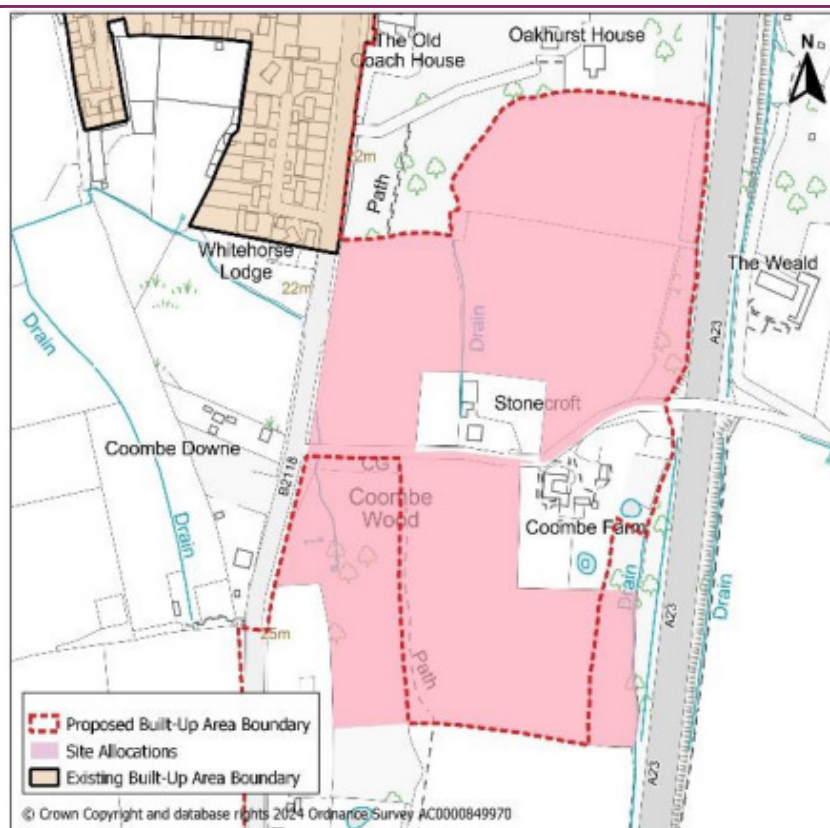
Figure 5.1 Sustainable Communities



Source: <https://shared.xmap.cloud/?map=a1afad0b-1939-41c9-ba1f-67b0962adeb1>

5.10. The built-up area boundary was proposed to be amended as part of the Schedule of Main Modifications (July 2024) to exclude parcels of ancient woodland in south east and south west corners of the draft allocation area. The amended boundary is provided below in figure 5.2 for ease.

Figure 5.2 DPSC5



Source: MSDC, Schedule of Main Modifications (July 2024)

- 5.11. The Stage 1 Hearings took place between Tuesday 22<sup>nd</sup> October and Thursday 31<sup>st</sup> October 2024. Planning Potential took part in the Stage 1 Hearings, on behalf of the Applicant, specifically in relation to Matter 3 (Vision, Objectives and Spatial Strategy) and Matter 6 (Housing).
- 5.12. On the 4<sup>th</sup> April 2025, published online on 2<sup>nd</sup> June 2025, the Inspector wrote to the Council with their findings following the Stage 1 Hearings which took place in October 2024. The Inspector concluded that the Council had failed to meet the Duty to Cooperate and is a matter which cannot be rectified. As such, the Inspector set out two options open to the Council, either to withdraw the Plan from examination, or to ask that the Inspector write's a report of their conclusions.
- 5.13. Whilst it is accepted that the weight that can be attached to The District Plan 2021 – 2039 at present is minimal owing to the stage the plan is at in its examination and the unresolved objections to this plan, it remains the case that the site selection process which underlies the Submission Draft District Plan supports the conclusion that DPSC5 is one of the most suitable and sustainable sites which is capable of helping to meet the Council's housing need. This is consistent with MSDC's assessment for ref: DM/25/1129 (200 units), as set out in the planning committee report (2<sup>nd</sup> October 2025) which sets out that *"in the preparation of the Submission Draft District Plan the Council has been through what officers consider to be a rigorous process of site selection...although the examining Inspector's letter to the District Council of 4<sup>th</sup> April 2025 is critical of the LPA, those criticisms focus on the DtC and do not call into question the methodology for the site selection work. In your Planning Officer's view, this work is robust and can be relied on to support decision making"*.
- 5.14. The Applicant remains committed to continuing to support and work collaboratively with MSDC in the preparation of the District Plan.

## 6. Masterplanning Approach and Sustainable Communities

- 6.1. As detailed, the site benefits from a draft allocation under DPSC5 'Land at Coombe Farm, London Road, Sayers Common' for 210 dwellings alongside supporting infrastructure such as on-site informal play space and the provision of sustainable transport measures, highway works and sewerage network upgrades.

### Masterplanning Approach

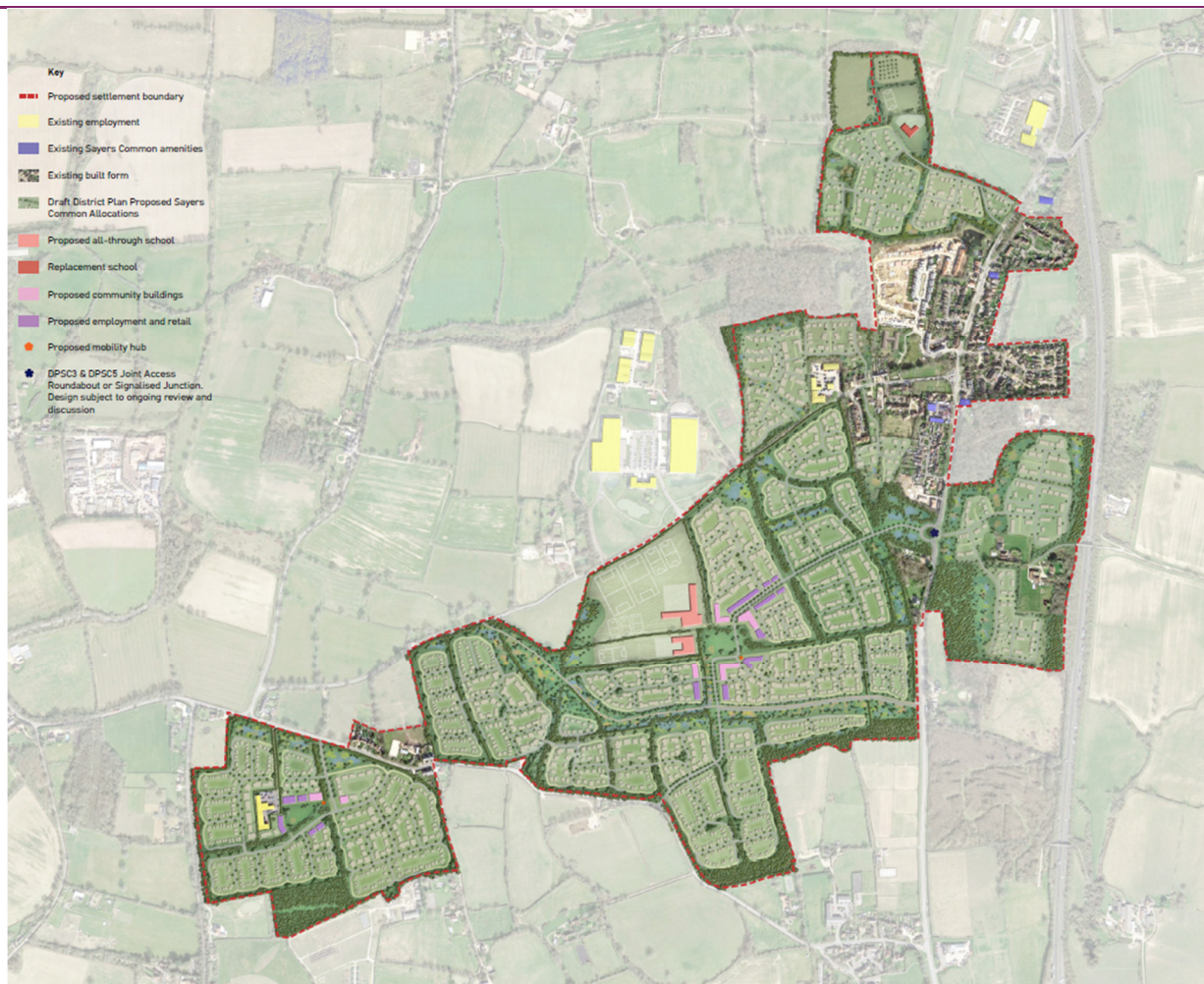
- 6.2. The site subject of this application forms part of a 'sustainable communities' allocation in the District Plan Review. Specifically, the District Plan Review identifies that these communities will provide a quantum of growth that will support provision of new services and facilities such as education, health, employment, retail and open space to meet day-to-day needs. This will enable these communities to be as self-sustaining as possible and grow in accordance with the 20-minute Neighbourhood and "Local Living" principles.
- 6.3. Those sites subject to the sustainable communities allocation comprise the following:
- DPSC4: Land at Chesapeake and Meadow View, Reeds Lane
  - DPSC5: Land at Coombe Farm, London Road
  - DPSC6: Land to the west of Kings Business Centre, Reeds Lane
  - DPSC7: Land at LVS Hassocks, London Road. The parties are committed to constructive joint working to bring forward and deliver the growth proposed at Sayers Common.
- 6.4. These are located in proximity to a Significant Site (DPSC3: Land to the South of Reeds Lane, Sayers Common) which is proposed to deliver a sustainable urban extension to Sayers Common, bringing new community facilities and services to the area as part of a mixed-use development.
- 6.5. As set out in Chapter 5 of this Planning Statement, draft policy 1 under DPSC5 requires any application to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections, and includes enabling the viability of new public transport services. The below commentary identifies how the Applicant and the application has considered and met this requirement.
- 6.6. A Sayers Common Developers Forum Meeting was undertaken on 16<sup>th</sup> February 2024, and hosted by MSDC in their offices. The meeting was attended by the promoters associated with DPSC3, DPSC4, DPSC5, DPSC6, and DPSC7, alongside Andrew Marsh (MSDC) and Natalie Sharp (MSDC). During the meeting, it was agreed that a Joint Statement of Common Ground (JSoCG) was to be prepared, which is discussed in further detail below.
- 6.7. In order to further the collaboration, the Small Sites Common Developers Forum was created, with a meeting undertaken at Welbeck's offices on 12<sup>th</sup> March 2024. This related to draft allocations DPSC4, DPSC5, DPSC6, and DPSC7.
- 6.8. A further Small Sites Common Developers Forum Meeting was undertaken on 13<sup>th</sup> March 2024. All parties circulated a PDF and DWG version of their proposed masterplan in advance of meeting, to enable discussions to focus upon how they can work collectively. Discussion matters included issues arising from meeting on 16<sup>th</sup> February 2024, progress of the JSoCG, updates on MSDC's timetable for submission of the District Plan Review and issues arising from Reg 19 consultation and the scope, timing and format of future meetings.
- 6.9. A further focussed meeting between DPSC3 and DPSC5 was undertaken in March 2024 to discuss access and highways matters, given the opportunities for future connections.
- 6.10. On 10<sup>th</sup> June 2025, a Sayers Common Developers Forum Meeting was undertaken with discussion matters including the approach to collaboration and masterplanning, surface water drainage, foul water drainage and community infrastructure. Each respective site provided an update on their masterplanning and housing trajectory.
- 6.11. Discussions between the Sayers Common Developers Forum are still ongoing, and collaboration between the relevant parties will continue following the submission of the application subject of this Planning Statement.



## Joint Statement of Common Ground

6.12. The JSoCG identifies that all parties have no restriction placed on them to come forward independently; however, in doing so, the established principles must be adhered to. A comprehensive masterplan was prepared jointly by the site promoters to show how the proposed allocations can be integrated and delivered holistically, and forms Appendix 1 of the JSoCG and is provided at figure 6.1 below for reference.

**Figure 6.1 Joint Indicative Framework Masterplan**



Source: Joint Statement of Common Ground

6.13. With regards to the site subject of this Planning Statement, the access proposals have been designed in a way which ensures the development can come forward independently of DPSC3, but ensures access into DPSC3 is not prejudiced by the proposals. The policy requirements of prioritising pedestrian and cycle access between the allocations is also met as part of this design, with a range of pedestrian and cycle crossing options between the two sites depending on the exact nature of DPSC3's access strategy.

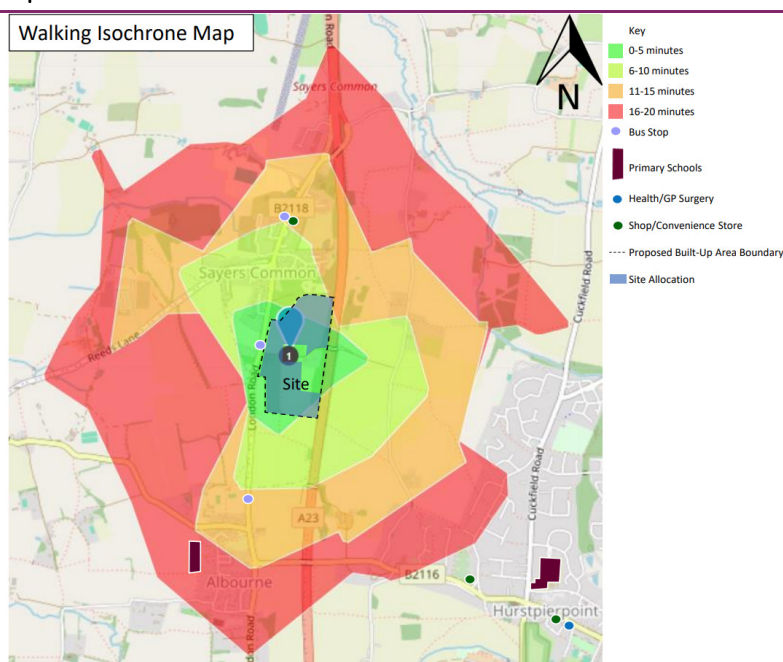
6.14. The Infrastructure Delivery Strategy set out in the JSoCG identifies the following site specific infrastructure for DPSC5.

- Highway access: on-site delivery by developer (may be shared with DPSC3)
- Travel Plan contribution: contribution by site developer
- Pedestrian & cycle access / PROW upgrade: on-site delivery by developer
- Informal outdoor space: on-site delivery by developer
- Surface water attenuation: on-site delivery by developer

## 20 Minute Neighbourhoods

- 6.15. The draft District Plan is guided by the '20-minute neighbourhoods' principle, which ensures new developments are provided in areas where most people's daily needs can be met within a short walk or cycle ride.
- 6.16. Policy requirement 1 of DPSC5 requires a coordinated approach and collaboration with other draft housing allocations within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles.
- 6.17. The site is within a sustainable location and within convenient walking distance of:
- Albourne CoE primary school (15 minute walk or 4 minute cycle);
  - The Village Hall Community Shop (5 minute walk or 1 minute cycle);
  - A Public house (3 minute walk or 1 minute cycle);
  - A community centre/village hall (5 minute walk or 1 minute cycle);
  - Employment areas to the west within 5 minutes walk; and
  - The Berrylands Playing Fields (10 minute walk or 3 minute cycle).
- 6.18. The nearest active bus stop to the site is located at Sayers Common, School, which is approximately a fifteen-minute walk from the centre of the site. This bus stop has two bus routes. The first bus route is the 100, which operates between Burgess Hill and Horsham. The second bus route is the 273, which runs between Crawley Bus Station and Old Steine in Brighton. The bus services on both routes run approximately every hour, although the exact frequency may vary depending on the time of day.
- 6.19. Whilst there is no specific cycling infrastructure within the vicinity of the site, the area is residential in nature and subject to a 30mph speed limit with sign posting. The roads are generally quiet, making it relatively safe for cyclists.
- 6.20. A series of isochrone maps, including that provided in Figure 6.2 and Figure 6.3 below, have been prepared by the Applicant's appointed highways consultant which demonstrate the walking, cycling and bus travel maps within a 20-minute radius of the site in relation to key amenities such as primary schools, health/GP surgeries and shops/convenience stores, as well in relation to the other site allocations within Sayers Common. The maps illustrate the site's ability to achieve the objectives of the 20-minute neighbourhood including the use of sustainable travel options to reach places of essential daily needs.

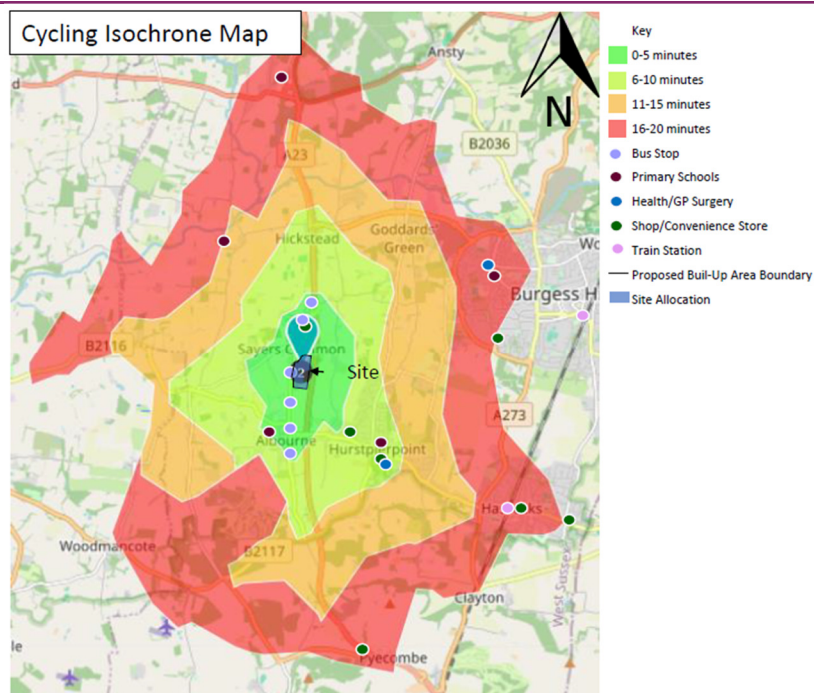
**Figure 6.2 Walking Isochrone Map**



Source: Paul Basham Associates



Figure 6.3 Cycling Isochrone Map

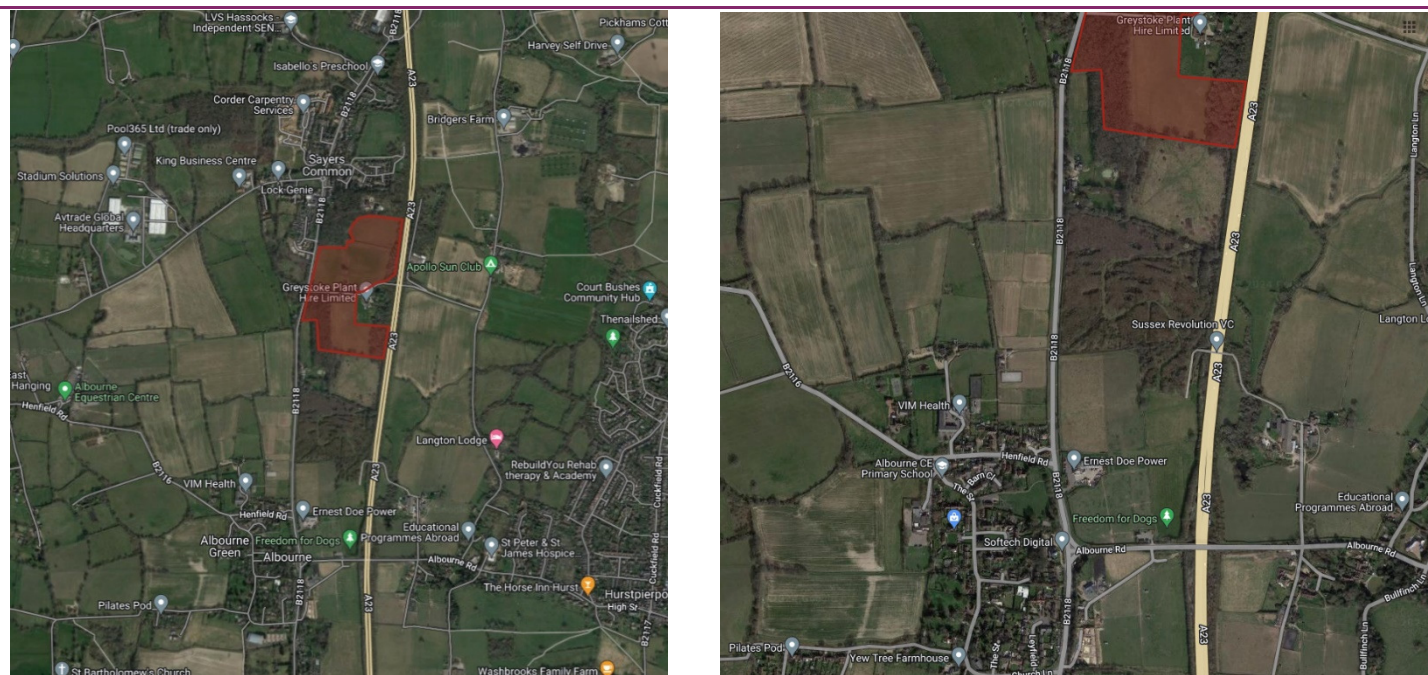


Source: Paul Basham Associates

#### Local Plan

6.21. The development of the site would maintain a clear gap between Sayers Common and Albourne, with significant vegetation between the site and the village of Albourne. Figure 6.4 below identifies the Site in relation to Albourne. Therefore, the proposals are in accordance with 'Policy Countryside HurstC3 Local Gaps and Preventing Coalescence' of the Hurstpierpoint and Sayers Common Neighbourhood Plan.

Figure 6.4 Local Gap



Source: Planning Potential Research

## 7. Technical Considerations

### Housing Mix

- 7.1. The housing mix will be determined during detailed design, at reserved matters stage. However, it is expected that the housing mix will be policy compliant.

### Self-Build Plots

- 7.2. Draft Policy DPH6 (Self and Custom Build Housing) requires a minimum of 2% of the residential plots on housing sites comprising of 100 or more dwellings will need to be provided as serviced plots for self or custom build housing. The proposed development will provide a policy compliant level of self-build plots. The location of the self-build plots will be determined at reserved matters stage.

### Landscape and Visual Impact

- 7.3. Scarp have prepared a Landscape and Visual Impact Assessment (LVIA), and this is submitted as part of this application.
- 7.4. The aim of the landscape strategy is to create an attractive, high-quality residential area that achieves landscape and visual integration and reflects the intrinsic character of the Low Weald. The development proposals have been informed by a detailed analysis of existing landscape and visual conditions (landform, vegetation, connectivity, landscape character, views etc) and the need to conserve the setting of the SDNP and its special qualities. A landscape-led approach has been adopted.

#### Landscape Effects

- 7.5. At Year 1, there would be a high magnitude of change on this medium/high sensitivity site landscape. The magnitude of landscape change would fall to medium by Year 15 when the proposed tree and shrub vegetation would be substantially mature and would provide a strong, positive contribution to the site landscape.
- 7.6. The Development would result in an overall very low magnitude of landscape change to the local part of the Hickstead Low Weald LCA at both Year 1 and Year 15. The predicted changes would be of slight significance for this medium/high sensitivity landscape.
- 7.7. There would be no conflict between the Development and the purposes of the SDNP, which include the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the area.

#### Visual Effects

- 7.8. With regards to views from the north, the magnitude of visual change for high sensitivity users of recreational footpaths within the National Landscape would be negligible at both Year 1 (winter) and Year 15 (summer).
- 7.9. With regards to views from the northwest, west and southwest, the effects can be summarised as follows:
- Views from the B2118: the magnitude of visual change during the day for medium sensitivity road users would be medium at Year 1 (winter) and low at Year 15 (summer).
  - Views from Public Footpath 11Hu: the overall magnitude of visual change for high sensitivity users of Footpath 11Hu would be low at Year 1 (winter) and very low at Year 15 (summer).
  - Views from other public rights of way: The magnitude of visual change for high sensitivity users of these recreational footpaths would be very low at Year 1 (winter) and negligible at Year 15 (summer).
  - Views from the SDNP escarpment near Steyning: The new built form would have negligible effects on the character and scenic quality of these distant views.
- 7.10. With regards to views from the south, views of the Development would not be available in either the winter or summer months when approaching from the south along Footpath 3HU. They would also not be available from publicly accessible locations near Albourne Green due to the enclosure provided by Chloe Wood, by local housing, by roadside vegetation alongside Albourne Road, by the east-west ridge and by the tree belts alongside the A23. There would be negligible changes to the scenic quality and settled rural character of these SDNP views during at both Year 1 (winter) and Year 15 (summer).
- 7.11. In terms of views from the southeast, east and northeast, there may be some filtered winter views of housing at Year 1 but built form visibility would be further enclosed by Year 15 with the partial maturity of the proposed supplementary trees/shrub planting. The magnitude of visual change would be low at Year 1 (winter) and negligible at Year 15 (summer). The proposed housing is unlikely to

be visible in either the summer or winter months from viewing positions on the eastern side of the A23 due to the cumulative enclosure provided by intervening vegetation and/or landform.

- 7.12. In terms of views from public rights of way within the site, the magnitude of visual change for high sensitivity users of recreational footpaths at both day and night would be high at Year 1 (winter) and medium at Year 15 (summer).
- 7.13. Notwithstanding the above, it must be accepted that there will be a change in the site's character, from a greenfield to a housing development. To meet the housing needs of the District, it is necessary to develop greenfield sites (this is particularly the case in a predominantly rural authority such as MSDC). The landscape in this case is not designated or considered to be a valued landscape for the purposes of the NPPF. The impacts on the development of this site are not considered to be any greater than that would occur on any other greenfield site in the District developed for housing. This cannot, therefore, be an argument on its own, especially in view of the national objective, as set out in paragraph 61 of the NPPF of significantly boosting the supply of houses.

## Heritage

- 7.14. Adopted Policy DP34 and draft Policy DPB2 (Listed Buildings and Other Heritage Assets) sets out that development will be required to preserve or enhance listed buildings and the contribution made by their setting.
- 7.15. Policy requirement 4 of DPSC5 requires the development of the site to be informed by a Heritage Impact Assessment, provide a layout and design which preserve the setting of nearby designated heritage assets.
- 7.16. A Heritage Impact Assessment has been undertaken by Orion, the appointed heritage consultant, and is submitted as part of this application. The assessment sets out that the site contains no known designated or non-designated heritage assets. Based on a review of available evidence the site is considered to have low potential for all archaeological periods. Due to the low archaeological potential, the proposed development will not have any below ground archaeological impacts. Therefore, further archaeological investigation in support of the development of the site is considered to be unnecessary.
- 7.17. The assessment has considered the effect of developing the site on the grade II listed Coombe Farmhouse (NHLE 1372073), the grade II barn at Coombe Farm (NHLE 1096895) and the grade II granary (NHLE 1039923). These structures will not be directly impacted by development. However, the setting of these structures extends within the study site boundary. The area in which these assets is experienced is somewhat restricted by the surrounding vegetation. As such, the rural fields within the study site are considered to make a minor contribution to the significance of these buildings, which lies in their architectural and historical interest as a 17<sup>th</sup> - 19<sup>th</sup> century farmstead.
- 7.18. The proposed masterplan retains open space around the farm complex. Whilst it is recognised that the proposed development will result in a change to the setting of the listed farm complex through the loss of the agricultural context, the addition of well-designed and considered residential development would not involve any meaningful loss of significance.
- 7.19. The development of the site is considered to result in less than substantial harm to the significance of Coombe Farmhouse and barn at Coombe Farm.

## Flooding

- 7.20. Adopted Policy DP41 and draft Policy DPS4 (Flood Risk and Drainage) sets out that proposals for development will need to follow a sequential risk-based approach directing development away from areas at highest risk (whether existing or future risk), ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. Specifically, surface water drainage schemes must be implemented in all new development.
- 7.21. Policy requirement 6 of DPSC5 requires the development of the site to follow a sequential approach by directing development away from areas of flood risk associated with the Site.
- 7.22. A Flood Risk Assessment and Drainage Strategy has been undertaken by Paul Basham Associates, the appointed flood risk and drainage consultants, and is submitted as part of this application.
- 7.23. The site is located within Flood Zone 1, the lowest risk of flooding according to the Environment Agency Flood Maps. However, whilst the majority of the site is considered to be at very low risk of surface water flooding, there is an area of high-risk of surface water flooding along the western boundary. Principally, this was focussed around the location of the site's original access design. As a result of this, and through liaison with the flood risk and highways consultants, the Applicant has subsequently shifted the proposed access further north, to locate it outside of the area of high-risk. This also assists from an arboricultural perspective. This revised access



design has been shared with WSCC highways, who have confirmed that they are happy from a technical perspective. Thereby demonstrating the adoption of the sequential approach,

- 7.24. Attenuation basins within the site will be used to retain surface water runoff and then discharge it at a controlled rate to match the pre-development greenfield QMED. The site has been split into two catchments with Catchment 1 (Northern Catchment) discharging into the existing ditch running along the western site boundary at a controlled rate of 38.9l/s. Catchment 2 (Southern catchment) discharging at a controlled rate of 14.6l/s into the ditch running parallel to the road running through the site.
- 7.25. On 17<sup>th</sup> September 2025, the Government updated the Planning Practice Guidance. 027 Reference ID: 7-027-20220825 sets out that *"in applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied"* (own emphasis added).
- 7.26. Based on the updated guidance on section 175 and Appendix 1 of the SFRA, the flood risk associated with the site is solely due to surface water. The proposed design incorporates a compensatory storage area to offset displaced floodwater, alongside raised finished floor levels for the dwellings. These measures will ensure the development remains safe from current and future flooding. Therefore, the sequential test does not need to be applied.

#### Ancient Woodland

- 7.27. Adopted Policy DP37 and draft Policy DPN4 (Trees, Woodland and Hedgerows) acknowledges that in some circumstances there may be wholly exceptional reasons which permit the deterioration, damage or loss of ancient woodland, and in such circumstances, a suitable compensation strategy should be provided. Whilst the exceptional reasons are not defined, it is anticipated that these will include matters such as enabling access and connectivity. It is also anticipated that the acceptability of the exceptional reasons will be assessed on the individual merits of the site and the associated benefits to be brought forward as part of any such development such as the delivery of much needed housing, and improvements to other areas of ancient woodland.
- 7.28. Policy requirement 5 of DPSC5 requires development of the site to address impacts associated with areas of ancient woodland both on and adjacent to the Site.
- 7.29. A Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EclA) has been prepared by The Ecology Partnership, and an Arboricultural Impact Assessment (AIA) has been prepared by Aspect Arboriculture, all of which are submitted in support of this planning application. The proposals fully acknowledge that trees and woodland make a valuable landscape, amenity and biodiversity contribution to the District and the development of the site seeks to retain and integrate the existing ancient woodland and groups of trees wherever possible.
- 7.30. Four blocks of woodland are located within the immediate vicinity of the site, as identified in figure 6 below, albeit these are designated under five separate names by Natural England (Coombe Farm Shaw, Coombe Wood, Sayers Common Wood, Sayers Common Wood E and W respectively). All four of these blocks are ancient and semi-natural woodland, and three of which are located within the Site's red line boundary.
- 7.31. It is understood that the parcels of ancient woodland within the Site boundary (Figure 7.1 below) are currently neglected and in a poor condition.

Figure 7.1 Ancient Woodland



Source: <https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england/explore?location=50.945864%2C-0.193296%2C16.66>

- 7.32. Whilst ancient woodland is not protected under statute, there is a presumption that ancient woodland should be maintained where possible. Benefits of development affecting ancient woodland must be significant in terms of social or economic drivers and mitigation measures and/or compensation must be provided to reduce where possible significant impacts. Paragraph 193(c) of the NPPF (2024) sets out that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 7.33. Natural England's standing advice for ancient woodland is for the creation of a buffer zone of a minimum of 15m from the edge of the woodland. The 15m buffer zones have been incorporated into the proposed masterplan.
- 7.34. The parcels of ancient woodland within the site boundary, which are currently neglected and in a poor condition, can be brought under a sensitive regime of management, thereby improving the woodlands' structure, quality, resilience and longevity.
- 7.35. It is understood that SUDs should be included on the edges of the ancient woodland buffer (outside the 15m) so that any ecological benefit as a result of SUDs development can be linked with maintained and enhanced habitats on the ancient woodland edge. SUDs are proposed as part of the development proposals, to ensure that there are no changes to water quality in the off-site stream network. The use of SUDs can ensure that water discharge and quality are maintained at current levels, as well as provide new opportunities for wildlife creation.
- 7.36. The EcIA concludes that following the application of compensation to remove residual effects, there will be a neutral residual effect after compensation on the ancient woodland and lowland mixed deciduous woodland.
- 7.37. Please refer to the PEA, EcIA and AIA for further information.

#### Arboriculture

- 7.38. To facilitate accordance with adopted Policy DP37, the proposals have been informed from an early stage by a survey of the existing tree stock using the guidance provided at BS5837:2012.
- 7.39. It should be noted that there is already an existing relationship between the bridleway and the ancient woodland. The proposed connection link will, unavoidably, pass through the buffer zone. However, the impact has been carefully minimised. The proposed link incurs the removal of T1. This is a justifiable position in terms of the mitigation hierarchy, in that it completely avoids any effect on the

significantly better quality T2 whilst remaining c.7m outside the Root Protection Area to edge trees within Coombe Wood. During pre-application discussions with MSDC, it was agreed that owing to the existing relationship, the impact is deemed acceptable.

- 7.40. The arboricultural effect of the proposed development has been minimised through an extensive iterative design process, and therefore introducing the scheme to the site incurs the removal of only one tree, and sections of hedgerow. The removals have been reduced as far as possible during the iterative process, and their loss can be compensated for with replacement planting. A single section of hard surface must pass through the buffer zone to Coombe Wood to provide connectivity between the northern and southern parcels of the allocation area. Set some 7m outside the Root Protection Areas of the woodland edge trees, the introduction of the feature will not detrimentally affect the trees.
- 7.41. An effective scheme for safeguarding retained trees has been prepared which relies on the use of recognised protection and construction methodologies; this is reinforced by precautionary reliance on arboricultural auditing where construction is proposed within influence of retained trees.
- 7.42. The proposed development is considered acceptable from the arboricultural perspective, subject to the adoption of safeguards for protecting trees during the works. The proposals have been developed in accordance with Mid Sussex District Council's adopted policies and the NPPF.
- 7.43. Prepared refer to the AIA for further information.

### **Biodiversity and Ecology**

- 7.44. Adopted Policy DP38 and draft Policy DPN2 (Biodiversity Net Gain) sets out that development will need to deliver a net gain in biodiversity which will contribute to the delivery of ecological networks, green and blue infrastructure and nature recovery. Specifically, development must demonstrate that good practice principles for biodiversity net gain have been followed. Development must demonstrate that the mitigation hierarchy has been followed and the biodiversity net gain is in addition to this requirement.
- 7.45. MSDC identifies a minimum target of 10% biodiversity net gain; however, will encourage a higher level of biodiversity net gain and developments must seek to maximise opportunities, especially where development is located in or in proximity to areas identified for nature recovery, the Biodiversity Opportunity Areas, irreplaceable habitats or priority habitats.
- 7.46. A biodiversity net gain will be achieved through the proposed development, delivered through the inclusion of areas of other neutral grassland, boundary planting, and the planting of a total of 158 individual trees within communal spaces. Additionally, Sustainable Drainage Systems (SuDS) have been designed to support wildlife and create new habitats on site. The main development is confined to the central grassland areas, which were assessed as having the lowest ecological value. Overall, no residual effects on the site's habitat value are anticipated.
- 7.47. Specifically, a BNG of 18.85% habitat units and 18.22% of hedgerow units is to be achieved on-site, significantly above the 10% mandatory BNG and should be viewed as a core planning benefit of the scheme.
- 7.48. Please refer to the Biodiversity Net Gain Feasibility Assessment and Metric, alongside the suite of ecology reports, prepared by The Ecology Partnership for further details.

### **Transport and Access**

- 7.49. Paul Basham Associates have prepared a Transport Assessment and Travel Plan, both of which are submitted in support of this planning application.
- 7.50. A Highways Pre-Application Scoping Note was produced and submitted to West Sussex County Council (WSCC). Feedback has been received from WSCC which have informed the proposed development and the Transport Assessment.
- 7.51. The proposed development has been shown to be well located to support a variety of travel modes. The site is well connected to the local road network, along with the strategic network including the A23. The local pedestrian and cycle networks are well located to promote use by future residents and offer opportunities for residents to walk and cycle to their local destinations. The site is also well supported by public transport, including regular bus services in close proximity to the site.
- 7.52. Vehicular access to the site will be via a new standard priority junction measuring 6m in width with 12m radii either side of the carriageway. Two-way vehicle tracking has been completed at the proposed access point highlighting that two private cars are able to pass each other without conflict.

- 7.53. The proposals identify a number of pedestrian links to and from the site which utilise some of the existing footpaths and bridleways which run through the site. The existing bridleway 86Hu will remain and provide a footpath/cycle link from the west of the site and south of the proposed vehicular access through the site and connecting to the east towards Hurstpierpoint. The bridleway will retain access to Coombe Barn and Stonecroft.
- 7.54. Internally, a new pedestrian connection will be provided at the north-west of the site connecting the existing footways alongside the B2118 with the internal pedestrian connections. Details of these internal links will be finalised as part of future reserved matters applications, however the masterplan sets out the principles of internal permeability for pedestrians internally to the site to encourage sustainable travel.
- 7.55. Vehicle tracking a refuse vehicle has been undertaken to demonstrate a refuse vehicle can safely access and egress the site.
- 7.56. WSCC 'Guidance on Parking at New Developments' (September 2020) provides the relevant standards according to Parking Behaviour Zones (PBZ). The proposed development is located within PBZ2 will comply with the standards outlined within the policy for both car and cycle parking.
- 7.57. The Transport Assessment has demonstrated that the proposed development will not result in a severe impact upon the local road network and therefore is in accordance with NPPF Paragraph 116.

### Noise

- 7.58. Adopted Policy DP29 (Noise, Air and Light Pollution) and draft Policy DPN7 (Noise Impacts) sets out that noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise unless adequate sound insulation measures, as supported by a noise assessment are incorporated within the development.
- 7.59. A Noise Impact Assessment has been prepared by Create and is submitted in support of this planning application.
- 7.60. A survey of 8 days and 7 nights was conducted at 2 representative locations to measure the residual levels. These sound levels were then used to construct a 3D noise propagation model for the site. The results from which have indicated that the vast majority of the site is suitable for residential development that utilises system 2-3 ventilation.
- 7.61. External sound levels were found to be above the amenity noise level recommendations in standard guidance but can however be achieved following further acoustic design as detailed within the Noise Impact Assessment which could be secured via condition.

### Lighting

- 7.62. Adopted Policy DP29 (Noise, Air and Light Pollution) and draft Policy DPN8 (Light Impacts and Dark Skies) states that development proposals must demonstrate that all opportunities to reduce light pollution (including sky glow, glare and light spillage) have been taken including minimising impacts on local amenity, intrinsically dark landscapes including protected landscapes, the South Downs International Dark Sky Reserve (Moore's Reserve) and areas important for nature conservation and nature recovery.
- 7.63. A Lighting Impact Assessment has been prepared by Create and is submitted in support of this planning application which concludes that subject to the implementation of the proposed design measures, a compliant lighting design scheme can be delivered with minimal impact on nearby residential properties and sensitive boundaries. Lighting will be limited to the access and site entrance, play areas, footpaths and pedestrian routes. No external lighting is currently proposed for the remainder of the site and is not required currently across the entire site. Any further lighting will be designed and agreed under planning condition following the findings and recommendations of this report. The cumulative effect of artificial lighting may result in a slight increase in sky glow, however, given the existing baseline conditions, in the surrounding area, the overall visual effects are expected to be negligible.

### Air Quality

- 7.64. Adopted Policy DP29 (Noise, Air and Light Pollution) and draft Policy DPN9 (Air Quality) identifies that the Council will require applicants to demonstrate that there is not an unacceptable impact on air quality. The development must minimise any air quality impacts, including cumulative impacts from committed developments, both during the construction process and lifetime of the completed development, either through a redesign of the development proposal or, where this is not possible or sufficient, through appropriate mitigation.
- 7.65. An Air Quality Assessment has been prepared by Create and is submitted in support of this planning application.

- 7.66. During the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by demolition and trackout activities is predicted to be negligible.
- 7.67. The modelled results show predicted annual mean NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> concentrations across the site boundary and at all existing receptor locations are below the relevant AQOs in 2039, when the development is completed. Additionally, the development is expected to have a negligible impact at all receptor locations, in accordance with EPUK-IAQM guidance.
- 7.68. Additional mitigation measures are detailed in Chapter 7 of the Air Quality Assessment to further reduce pollutant concentrations further. Based on the assessment results, air quality is not considered a constraint to granting planning consent for the proposed development.

### Energy and Sustainability

- 7.69. Adopted Policy DP39 (Sustainable Design and Construction) states that all development proposals must seek to improve the sustainability of development and should where appropriate and feasible according to the type and size of development and location. Draft Policy DPS2 (Sustainable Design and Construction) notes that all development must submit a proportionate Sustainability Statement to demonstrate how through its design, construction, operation and use it will contribute to the reduction of greenhouse gas emissions, increase resilience to the impacts of climate change and improve sustainability.
- 7.70. Create prepared an Energy and Sustainability Statement which is submitted in support of this application.
- 7.71. The Energy hierarchy approach of “Be lean” – “Be clean” – “Be green has been adopted by implementing the following measures:
- Passive design measures and ‘Fabric First’ approach (low U-values)
  - High efficiency services, i.e., low energy lights, high efficiency ventilation
  - LZC technologies: Efficient heat pump, photovoltaic panels, and Solar hot water
- 7.72. The residential component of the outline application is designed to achieve the following site-wide reductions in regulated CO<sub>2</sub> emissions, relative to a 2021 Part L compliant baseline:
- An overall reduction of 75–80% in regulated CO<sub>2</sub> emissions.
  - A 50–60% reduction in regulated CO<sub>2</sub> emissions through the integration of LZC technologies (Be Green).
  - A 15–20% reduction in regulated CO<sub>2</sub> emissions through fabric energy efficiency improvements implemented at the Be Lean stage.
- 7.73. Other proposed measures can be summarised as follows:
- Implementing Circular economy strategies, site waste management plan and resource efficiency benchmarks.
  - Adhering to best practice policies for air, water, noise, light and ground pollution.
  - Achieving a water consumption target of 110 litres/person/day with low water-consuming fittings.
  - Promoting sustainable transport options, such as provisions for cycle storage and car parking.
  - Ensuring high build quality beyond minimum Building Regulations standards and using responsibly sourced materials.
  - Prioritising health and wellbeing through design and operational procedures, including adequate daylight, indoor air quality, and thermal comfort.
  - Enhancing the ecological value of the site through measures such as tree planting and the inclusion of native plant species.
- 7.74. The Energy and Sustainability Assessment demonstrates that the proposed measures comply with the requirements set out in planning policy and Part L of the Building Regulations.

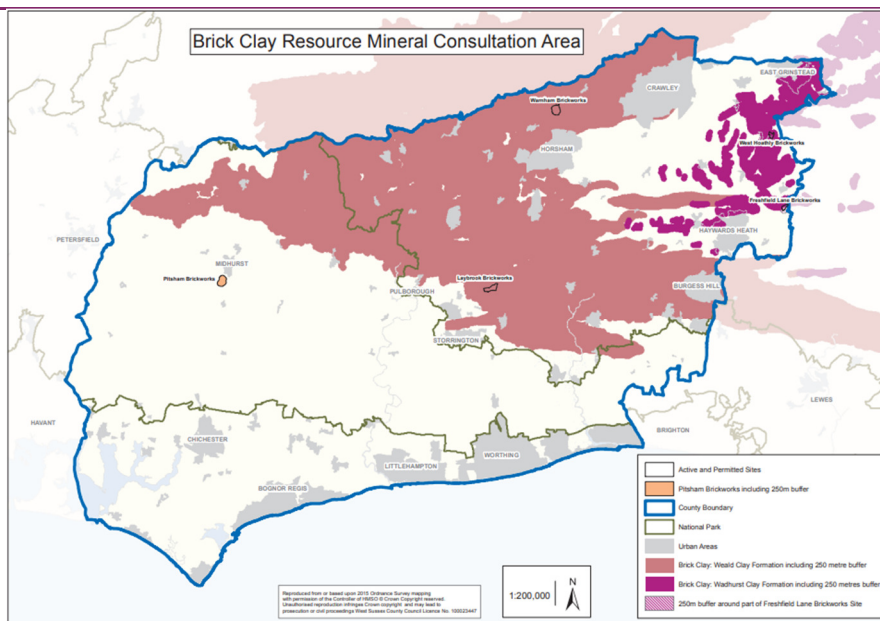
## Geo-Tech Phase 1 Contamination Assessment

- 7.75. Create have prepared a Phase 1 Contaminated Land Assessment which is submitted in support of this planning application.
- 7.76. Based on the findings of the assessment, it has been concluded that there is no significant source of contamination or potential for contamination to. As such, no further intrusive investigations with regards to contamination are considered necessary for the proposed development.
- 7.77. With regards to geotechnical risk, a targeted ground investigation would provide design parameters for proposed foundations, road construction, any proposed retaining walls, stability of slopes and building near trees.

## Minerals

- 7.78. All of Sayers Common village and the surrounding land area is situated within the Weald Brick Clay Resource Consultation Area, as identified in the West Sussex Minerals and Waste Safeguarding Guidance (March 2020) statement and shown below in Figure 7.1

**Figure 7.1 Weald Brick Clay Resource Consultation Area**



Source: Minerals and Waste Safeguarding Guidance (March 2020)

- 7.79. The proposed site lies in a two-tier local authority area, as such, all minerals planning related matters are undertaken by West Sussex County Council.
- 7.80. It is acknowledged that the proposed development of the site will result in the sterilisation of such material present within the site.
- 7.81. The current brick clay reserves are as follows:
- Permitted reserve (all sites): 12.49mt
  - Sales (all sites): 0.28mt
  - No. active brickworks: Three
  - No. active brickworks with at least 25-years of reserves: Two
- 7.82. Paragraph 227 of the NPPF states that minerals planning authorities should plan for maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment. For brick clay reserves should be at least 25 years. As identified above, there are estimated to be two brickworks in West Sussex with at least 25 years of reserves.



Figure 7.2 Brick Clay Permitted Reserves and Annual Sales (2014-2023)

Table 2: Brick Clay Permitted Reserves and Annual Sales (2014 to 2023)

Year	Total Brick Clay Reserve Remaining on Sites with Planning Permission (mt)	Annual Sales (mt)
2014	16.1	0.35
2015	18.7	0.28
2016	18.3	0.33
2017	18.0	0.33
2018	17.8	0.30
2019	17.5	0.31
2020	14.2	0.31
2021	13.04	0.28
2022	12.8	0.28
2023	12.49	0.28
<b>10-year average</b>	<b>15.9</b>	<b>0.31</b>

**Note:** Some information may be based on estimates therefore updated reserve data should be provided in support of any planning applications.

Source: West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2023/24

- 7.83. The information shown in Figure 7.2 above identifies that the total permitted Brick Clay Reserve for West Sussex was 12.49 million tonnes in 2023. The 10-year annual sales average from 2012 to 2021 was 310,000 tonnes per annum. Therefore, there is a 40.29 year supply of permitted reserves based upon the current 10 year average sales figures.
- 7.84. Based upon the supply and historical demand figures noted above, that there is no requirement for new sources of brick clay over the long term. This is reflected within the minerals safeguarding guidance produced by West Sussex Council which acknowledges that demand for brick clay is low.
- 7.85. Whilst it is acknowledged that current supply levels do not reduce the need to safeguard mineral resource over the longer term, the current supply and demand figures coupled with the broad geographical spread of the brick clay mineral resource across West Sussex are relevant considerations when considering individual proposals and weighing the benefits of those schemes against the level of mineral sterilisation that may or may not occur.
- 7.86. Notwithstanding the above, given the site's proximity to existing residential properties, it is considered that extraction of minerals from the site would be deemed unacceptable in principle, given the impacts this would have upon existing residential amenities.

### Infrastructure Contributions

- 7.87. It is considered that the impact of the proposal on infrastructure can be mitigated through contributions.
- 7.88. Provision standards and/or financial contributions are based on the number of dwellings and size of population that will occupy a proposed development. For an outline application, it is accepted that some, or all, of these requirements may not be known. In these circumstances, the relevant costs formulae can be included within in the section 106 agreement, so that there is a clear commitment to providing appropriate contributions. Those contributions will subsequently be calculated upon the reserved matters stage once the number, type and/or size of dwellings is known, without having to amend the legal agreement.
- 7.89. These contributions will comply with Adopted Policy DP20 and the Community Infrastructure Levy (CIL) Regulations and will be secured by a section 106 legal agreement.

## 8. Conclusions

- 8.1. This Planning Statement supports an outline planning application for the following *“Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space; drainage and associated works.”*
- 8.2. As set out in Chapter 2 of this Planning Statement, the site is in a sustainable location with key amenities and facilities able to be accessed via active travel modes. This includes Albourne CoE Primary School which can be accessed within a 15-minute walk or a 4-minute cycle.
- 8.3. The site is proposed to be allocated for housing in the District Plan 2021 – 2039 (DPSC5). Whilst it is accepted that the weight that can be attached to this document at present is minimal owing to the stage the plan is at in its examination and the unresolved objections to this plan, it remains the case that the site selection process which underlies the Submission Draft District Plan supports the conclusion that DPSC5 is one of the most suitable and sustainable sites which is capable of helping to meet the Council's housing need.
- 8.4. An appeal decision from 2<sup>nd</sup> October 2025 (APP/D3830/W/25/3361729) sets out that the Council acknowledges that it cannot demonstrate a 5-year supply of deliverable housing sites, with the reported supply being equivalent to 3.38 years. Footnote 8 of the Framework is clear that the policies which are most important for determining the application are deemed out-of-date. In these circumstances, paragraph 11d)ii) of the Framework is applicable and it follows that reduced weight is afforded to policies relevant to the supply of housing.
- 8.5. The proposed scheme will provide for a range of significant economic, social and environmental benefits, in accordance with paragraph 8 of the NPPF, which can be broadly summarised as follows:

### Economic Objective

- Creation of job opportunities, both during construction and management stages.
- Injection of S106 contributions into MSDC.
- Expenditure in the local community by future occupants of the scheme.

### Social Objective

- Creation of up to 210 dwellings, including a policy compliant level of affordable housing and self-build plots.
- The provision of a range of unit sizes and types, extending the choice of housing in Sayers Common.
- Creation of family housing.

### Environmental Objective

- Sensitively designed development that respects the setting of nearby heritage assets.
- Promoting active travel through new pedestrian and cycle connections within the site and beyond.
- The incorporation of biodiverse areas of planting, street trees and landscaping, and the enhancement of existing natural features on the site, puts the natural environment at the heart of the scheme.
- Biodiversity net gain of 18.85% (habitat units) and 18.22% (hedgerow units).
- Promotion of sustainable active transport options.
- Use of sustainable drainage systems.
- Application of the energy hierarchy.

- 8.6. Given the inability for MSDC to demonstrate a five-year housing land supply and the goal of national policy to significantly boost the delivery of housing, it is concluded that the proposed development, delivering up to 210 residential units including affordable housing, should be afforded substantial positive weight in the planning balance. This is consistent with MSDC's assessment for ref: DM/25/1129 (200 units), as set out in the planning committee report (2<sup>nd</sup> October 2025)



- 8.7. The design and layout approach which has informed the illustrative masterplan and parameter plans subject of this outline application has been progressed in full coordination with the technical consultant team and has taken into consideration the site's opportunities and constraints from the outset. The approach has been led by landscape and visual considerations with careful attention given to the location and layout of the proposed housing, infrastructure and open space with regards to the conservation of landscape character, visual amenity, heritage, arboriculture and ecology.
- 8.8. The proposals have been developed through collaborative and ongoing discussions with key stakeholders such as MSDC (including urban design) and WSCC, alongside engagement with other draft housing allocations within Sayers Common through an iterative masterplanning approach.
- 8.9. The application proposals provide for substantial and wide-reaching benefits, which accord with the economic, social and environmental objectives of paragraph 8 of the NPPF, and which are not outweighed by any adverse impacts of the development.
- 8.10. Reasonable and suitably worded conditions can be attached to any planning permission to secure required mitigation measures. In addition, the impact of the proposal on infrastructure can be mitigated through contributions which will be secured by a section 106 legal agreement.
- 8.11. Therefore, it is respectfully requested that planning permission be granted.