



WILD (Watchdog for Intrusive Local Development) is a group of local residents in Albourne and Sayers Common formed to challenge inappropriate development in the local area. We have the following objections to make to the planning application DM/25/2661 - Land at Coombe Farm

- **Process**

The public have not been properly notified. The circulation list for letters to local residents is too restricted: most Sayers Common residents will use the B2118 and are directly affected by the proposed scheme. The deadline for consultation is unclear. It is given as 14 November in the letter to residents; 18 November on the site notice and most recently 26 November on the website. The application seeks outline approval but the developer has submitted 44 documents in support. It has not been made clear whether respondents should have considered all these at this stage or not.

- **Coalescence**

The coalescence policies in both the current and draft district plans are effectively the same and so carry weight. The proposed scheme will have an urbanising effect on the area between Albourne and Sayers Common, and will contribute significantly to the overall effect of urbanisation should DPSC3 proceed. The Council recently rejected the development between Cuckfield and Ansty on these grounds and should act consistently by doing so here.

- **Heritage and Landscape**

The site provides a view typical of the rural Sussex landscape to those passing by on the B2118, and is valuable in its own right. Inspector Bust, hearing 'the Croudace appeal', attached significant weight to the importance of views. The NPPF para 83 restricts housing in rural areas, and this scheme contravenes its provisions. Section 66 (1) of the Planning Act 1990 requires that special regard should be paid to preserving the setting of listed buildings. Despite changes to the scheme the proposal still dominates and overwhelms the grade 2 listed buildings adjacent to the site. Landscape character, views, and the impact on heritage assets all formed part of the Council's defence of the Croudace appeal. To be consistent, it should reject the application.

- **Biodiversity**

The applicant's own statutory metric acknowledges that irreplaceable habitat is present at the baseline assessment and will be lost. NPPF para 193c says that development resulting in the loss or deterioration of irreplaceable habitat should be refused. The applicant has not met the requirements of para 195 which says that the presumption in favour of sustainable development does not apply unless an appropriate assessment has taken place. The applicant has not provided evidence that they have done so.

The Levelling Up and Regeneration Act 2023 requires councils to have regard for the Local Nature Recovery Strategy. The Sussex strategy identifies the area as significant; capable of measurable improvement; and with important future potential. Although currently out to consultation, this evidence base will not change and the Council must take it into account.

The BNG assessment proposes that woodland will be replaced by grassland, destroying habitat and substituting a less distinctive alternative.

- **Water and Flooding.**

A proper sequential test has not been carried out to ensure that the proposed system of attenuation ponds on a clay base, and measures at the site access point, will be effective - see Planning Statement 7.25; Flood Risk Assessment 8.10. The area is already prone to flooding and here is no evidence that water flow from the pond can be managed away effectively. The applicant's own graphics show flow across the B2118 across the site of what is now Wintergreen Way, although their maps are out of date and do not include this recent development. The NPPF (170, 181) is clear that development should not increase risk elsewhere.

- **Travel Plan/Transport Assessment**

The WSCC preapp consultation response (2.9-12) noted serious concerns about the potential of the area for active travel which are not acknowledged or addressed in the travel plan. Inspectors are rightly skeptical of off-the-shelf approaches such as this which lack clarity as to the action which will be taken as a result of monitoring (see APP/L3815/ W3344538, 661,663 para 10-30, in analogous locations).

Modelling in the transport assessment looks low and optimistic, given that there could be up to 400 cars on site according to the car parking standards formula, and no account is taken of the proximity of the access points of Wintergreen Way, Furzeland Way, and the access route to DPSC3.

The Systra v.6 report is flawed and cannot be relied on. TRICS data is unable to separate urban and rural traffic: a bespoke study is required. The home working assumptions have been inflated above the regional norm without supporting evidence; the Council's own Sustainable Economy Strategy Profile acknowledges high levels of commuting in and out of the district, which is certain to occur from the site given the proximity to the A23; and the evidence adduced in the report from other studies relates to unrepresentative urban locations (Aberdeen, Lambeth, Outer London, Newcastle).

- **Design**

The site plans resemble a fortress, surrounded by a mediaeval moat. The density is excessive for a rural location disconnected from other urban settlements, breaching the Council's own policy DP6; and the NPPF is clear (11.b.i) that in these circumstances scale should be restricted, even where the presumption of sustainability applies. Three story buildings are not acceptable, both because of the location and the precedent they would set for other development in rural settings.

In conclusion, the Council should be guided by their own policies and previous decisions; the expectations of the NPPF; and their own likely vulnerability at appeal for the reasons set out above; and reject this application.