

The Amberley Society

The aim of the Society is the conservation and improvement of the amenities, character and interests of Amberley and its surroundings

www.amberleysociety.co.uk

SDNP LOCAL PLAN REVIEW - LAND AVAILABILITY ASSESSMENT (LAA)
PUBLIC CONSULTATION (REGULATION 18)

Policy SDXX: East Street Farm, Amberley
LAA Reference HO037-038

The Amberley Society with close on 200 members wishes to submit the following response.

Executive Summary

The Amberley Society strongly objects to the LAA proposal identifying the East Street Farm Fields, Amberley, for the potential of 25-45 new houses. Our primary concern is of site suitability due to the detrimental effect that so many houses and users would have on the chalk stream, a 'Priority Habitat' that flows through the land. A further concern is the unsuitable vehicle access via the narrow, single carriageway, High Street and Conservation Area and then through the densely populated Hurst Cottages. Other concerns are flood risk, and sustainability. We believe that the proposal is completely against National Park Purposes and has not taken current policies into account. Conversely, we propose an alternative community-based solution to conserve and enhance the natural beauty and wildlife of the site. Amberley is recognised as a small, proud, historic Downland village with an active community. We would like the land to be acquired from Horsham District Council and turn this poor-quality grazing land into a connected local nature reserve with natural improvements to conserve and enhance the chalk stream, its surroundings, and the village, which is also known as 'The Pearl of Sussex'.

Appendix 1 **Amberley Chalk Stream Report** is a well referenced and important document.

Appendix 2 **Unsuitable Access Route**. Supporting images.

(See <https://www.amberleysociety.co.uk/societypage> for appendices)

Previous Allocation

In the 2014 SHLAA, Amberley was allocated a target of 6 new houses which was used to inform the Amberley Neighbourhood Plan 2016 – 2032. On top of these 6 houses a further 8 houses have been built. This demonstrates that Amberley is not opposed to new development that is proportionate, in the right place, sustainable and meets our needs.

The SDNPA has not complied with policy SD26 for a Medium Dispersed Development Strategy.

The 2025 revised LAA for Amberley is for an additional 25-45 new houses. For this allocation the SDNPA has not complied with policy SD26 for a Medium Dispersed Development Strategy. The SDNPA published a claim that SD26 *'methodology will ensure that we consider all potential sites in the same way across the National Park.'* After questioning, the SDNPA informed us that they had not used the SD26 methodology for Amberley because the land was available and that was how many houses they could fit on the land. We believe this allocation of so many houses is not in the interests of Amberley's housing need but is about increasing the potential to maximize the hope value of the land for the owner, Horsham District Council, to sell it to a developer.

Suitability – We believe the site is not suitable for the following reasons:

1. A chalk stream flows across the site.

Appendix B of the LAA states, *'There is no reason to indicate why development of the site is not achievable or appropriate'*. At the time this statement was made, there must have been an oversight of the existence of the chalk stream.

Sarah Hughes, Chalk Stream Resilience Officer of the Western Sussex Rivers Trust, has clarified that the stream is a chalk watercourse.

In a media release on 11 March 2025 the SDNPA claimed that:

- *'The chalk stream is one of only 200 in the world'*.

Strategic Policy SD17: PROTECTION OF THE WATER ENVIRONMENT. (Revisions underlined)
Local Plan Review states as a 'Key Issue': *'The importance of Chalk Rivers and Streams at the Chalk Stream Restoration Strategy 2021 and Implementation Plan 2022. Chalk rivers and streams are rare, ecological diverse and vulnerable habitat'*.

'The creation of new water features in the environment, as well as the conservation, enhancement and restoration of existing features.'

'2 Development proposals that affect groundwater, surface water features, and watercourse corridors will not be permitted unless they conserve, and enhance, and where possible restore, the following:

c) Specifically for surface water features and watercourse corridors:

i: Habitat quality, biodiversity and contribution to nature recovery, including eradication and control of invasive non-native species. Special regard will be given to the conservation, enhancement and restoration of chalk stream priority habitat ...'

5 Development proposals must provide adequate protection zones and buffers to watercourses. It must be demonstrated that the buffer is suitable to retain the natural function of the watercourse and its biodiversity and minimise direct and indirect impacts to the watercourse.'

DEFRA: *'England is home to 85% of all chalk streams and restoring these internationally important habitats is a government policy.'*

Environment Agency: *'Chalk streams are one of the rarest freshwater habitats on Earth, and England is home to approximately 85% of them. The future of chalk streams is dependent on action by everybody, government, regulators, water companies, farmers, and landowners.'*

SD4: LANDSCAPE CHARACTER. (Revisions underlined)

4. *Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.'*
5. *The restoration of landscape character where positive elements and features have been lost or degraded will be supported.*

SD8: DARK NIGHT SKIES.

1. *Development proposals will be permitted where they conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core as shown on the Policies Map.*

Development of up to 45 houses on this land would have a negative impact. The dark skies corridor of these three fields is important for wildlife. We are fortunate to have a good population of hedgehogs and the dark corridor is especially important for migratory invertebrates such as moths.

Appendix 1 of this document is an important part of this submission. It has been produced by a focus group and gives further significant details about this chalk stream and its importance. The Society fully supports its findings and recommendations for the creation of a new local nature reserve.

The community would like the land to be acquired from HDC to create a new nature reserve and restore the chalk stream to a more natural state and good ecological status. Doing so would:

- Support SDNP purposes and duty.
- Enhance Landscape character.
- Conserve and enhance natural beauty.
- Aid nature recovery.
- Improve water quality.
- Reduce flood risk through nature-based solutions and natural flood management measures. Re-wiggling, leaky dams etc.
- Preserve Dark Night Skies, particularly important for wildlife and migrant invertebrates.
- Preserve tranquillity.
- Be a community space with public access for the enjoyment of the natural beauty of the countryside.
- Direct access to the neighbouring Amberley Primary school for nature education.
- Take into account the Amberley Neighbourhood Development Plan by planting an area of orchard.
- Provide a blue and green corridor and enhancement through connectivity to the Millennium Green. This is a designated green space through which this chalk stream also flows.
- Attract visitors who can access the site from the existing car park and public right of way.
- Protect the land with a thriving nature habitat not only for today but for future generations.
- Support the SDNP 'Help Nature to Renature' initiative to increase land managed for nature of the National Park from 25% to 33% by 2030.

It is proposed that the top field to the north would also be a part of the nature reserve. It would act as a buffer zone to the chalk stream and must be in accordance with the requirements of SD17 (5). The land is higher and water run-off from any buildings and hard surfaces would drain down to dilute and harm the water quality. The chalk stream would need to be protected from pollutant harm. Housing pollutants such as, garden fertilizers, glyphosate weedkillers, systemic pesticides like neonicotinoids used as tic and flea treatments for pets and strong detergents used for cleaning cars would all be particularly harmful if they entered a watercourse.

2. Flooding

SD49: FLOOD RISK MANAGEMENT. (Revisions underlined)

1. a) 'Following a sequential approach to flood risk management steering development away from areas of flood risk, including existing or future flood risk for the lifetime of the development, taking account of climate change, and directing development to areas of lower flood risk where possible The cumulative impacts of all sources of flooding should be considered.'
2. b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk.'

The flooding problems on these fields are directly related to the geology. Underlying the thin deposit of topsoil on these three fields is a layer of Malmstone, which is a pale grey, lime cemented siltstone used in most of the old walls and buildings in the Conservation Area. (Building Stones of West Sussex – Roger Birch & Roger Cordiner) It is a seam of rock about 80m thick that dips south from the village towards the B2139 and then onwards under the Downs. It is known as the Malmstone bench. The stone does not have the porosity of chalk and is the very reason that chalk streams appear at the foot of the chalk Downs.

The impervious nature of the underlying dip slope bedrock means that these fields are usually waterlogged in winter and are prone to flash flooding.

The flash flooding in 2013-2014 was compounded by the new development of houses at Newland Gardens. It led to the flooding and failure of the sewage pumping station. Raw sewage backflowed through toilets and contaminated the flood water outside of the Primary School where manhole covers had been hydraulically lifted off. Contaminated water flowed and was pumped into the chalk stream.

To alleviate flooding an engineered solution, 'Operation Watershed' in 2014 by the Environment Agency and WSCC, divided the chalk stream with a new bund and drain to meet with a drain from Newland Gardens. This then joins a ditch/drain/stream which passes through an additional south culvert under School Road to re-join the main chalk stream. The two existing culverts would be inadequate for any new development.

The material geological nature of the land and consequential additional flood risk, makes the East Street Farm site unsuitable for high density housing as proposed.

3. The access proposed is via Hurst Cottages

SD12: HISTORIC ENVIRONMENT AND CULTURAL HERITAGE. (Revisions underlined)

1. *'Development proposals will only be permitted where they conserve and enhance the historic environment and cultural heritage, including through the safeguarding of heritage assets and their setting.*

SD7: RELATIVE TRANQUILLITY:

1. *Development proposals will only be permitted where they conserve and enhance relative tranquillity and should consider the following impacts:*
 - a) *Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;*
 - b) *Indirect impacts that may be caused within the National Park that are remote from the location of the proposals themselves such as vehicular movements; and*
 - c) *Experience of users of the PRow network and other publicly accessible locations.*
2. *Development proposals in highly tranquil and intermediate tranquillity areas should conserve and enhance, and not cause harm to, relative tranquillity.*

There is strong and, most probably, universal objection by the community to this proposal. This access would force all traffic through the centre of the village and Conservation Area. From the B2139 the route is via School Road past the Primary School, up the narrow High Street where it makes a very sharp right-hand bend on to East Street before turning right again into and through the Hurst Cottages housing estate. It is 0.6 miles.

The junction of School Road with the Turnpike Road (B2139) is dangerous. Sight lines for traffic emerging on to the B2139 are obscured by vegetation and it is the same for walkers crossing from Mill Lane to the south. There is no means of speed checking or monitoring on this busy, fast road. There have been at least two fatal car accidents at this junction; 1988 and 2011. Extra traffic to and from potential new housing using this designated access would, almost certainly, increase accident risk.

There are no parking restrictions in the village, so the entire route is often lined with parked cars leaving just a single lane for traffic. There are no verges or pavements along most of the route. Some pavements at 0.65m are not wide enough for a mother with a baby buggy going to the school or for a pedestrian with a dog. (Appendix 2)

There are frequent gridlocks of traffic when opposing vehicles are unable to pass or reverse into a queue of traffic. Much of the route is bounded by high walls and buildings and congestion causes a build-up of fumes and noise. The road could not be widened in the Conservation Area. There have been two known instances when fire engines on emergency calls have been unable to get through. (See appendix 2). One was to a thatch fire of a Listed building the other to a fire and exploding gas cylinder. The school bus frequently gets blocked. Gritting and bin lorries have also been blocked. Oil and LPG delivery tankers regularly have no option but to block streets during delivery.

A recent unofficial traffic survey by residents, even conducted in wintertime, showed that there are half as many pedestrian movements as vehicles. Pedestrians include mothers and toddlers going to and from the primary school, dog and leisure walkers, residents, and tourists. The tight corner of the High Street where it meets East Street at the Black Horse Inn is extremely hazardous. Without pavements and with low sun, conditions are especially hazardous for pedestrians along East Street as drivers are often unable to see them. It is the same at dusk and night as there are no streetlights in the village. There are many children in the Hurst Cottages estate who play there and must cross the road to the Millennium Green and football field. There is also a small playground immediately adjacent to the road.

The addition of 25-45 houses would mean a massive increase in traffic caused by the new residents' vehicles, plus delivery vans, service vehicles, etc. During the construction phase with large heavy vehicles, it will be chaos and potentially harmful to the many listed buildings and heritage brick drainage gullies which are a feature of the Conservation Area. (See Appendix 2). Some listed buildings have roofs and guttering overhanging the highway, which have been damaged in the past by high-sided commercial vehicles. (See Appendix 2)

East Street, and the road through Hurst Cottages, is a known Hedgehog highway and the extra traffic would cause harm to wildlife.

The route proposed is simply unsuitable and its use as access for this site would cause considerable harm. Access to the site should be directly off the B2139 main road, either via the existing junction with safety enhancement, or from a new access.

4. Sustainability

SD 1: SUSTAINABLE DEVELOPMENT

2. *'The National Park purposes are i) to conserve and enhance the natural beauty wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes.*
3. *Planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally: a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and b) There is substantial compliance with other relevant policies in the development plan.*

SD19: TRANSPORT AND ACCESSIBILITY

1. *Development proposals will be permitted provided that they are located and designed to minimise the need and/or distance to travel and promote facilitate the use of sustainable modes of transport, including active travel.*
2. *Development proposals that are likely to generate a significant number of journeys must be located near existing town and village centres, public transport routes, main roads and,*

where relevant, the cycle network. Such developments will be required to provide a transport assessment or transport statement.

- 3. Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.*

25-45 new homes would increase the population of our small Downland village by a conservative estimate of 18%. This large influx of people would not be sustainable.

- Insufficient job opportunities.
- Reliance on private transportation as there is no regular bus or taxi services. There is a village minibus, shared with Slindon village and run by volunteers to different locations once each weekday. It is currently out of service having been stolen.
- Amberley train station is one mile distant and only has a very small carpark.
- There are no cycleways. The B2139 is a narrow, straight, fast, and busy road with undulations blocking sightlines. Speeding control is not possible because of the lack lay-bys. Between Amberley and Storrington there have been many fatal car accidents.
- Only one small village shop.
- Doctor surgeries and pharmacies are a drive away in Storrington, Pulborough and Arundel. Doctor appointments can take up to five weeks.
- A&E hospitals are more than a 30-minute drive.
- There are no local dental practices accepting new NHS patients.
- Current infrastructure is limited with frequent power cuts. There is no mains gas so present heating is by oil, LPG, or electricity. The phasing out of oil and LPG usage will increase electricity demand, as will electric car use.
- Water supply is limited and there are regular summertime hosepipe bans.
- Sewage disposal is already at or near capacity and there is history of failures.
- Amberley does not have a village hall, only a small church hall with a seating capacity, without tables, of 75.
- Biodiversity loss due to change of use of land from pasture to housing.
- Biodiversity loss to 'Priority Habitat' of a chalk stream blue and green corridor.
- Water quality deterioration.
- Increased flood risk.
- Air pollution increased, particularly in narrow enclosed streets.

5. Land is outside of the Settlement Boundary

Development is outside of the Settlement Boundary as defined in the Amberley NDP (Neighbourhood Development Plan). Development outside of the boundary can only be allowed in exceptional circumstances.

6. Development of the Lower Field

We understand that the lower field HO039 had been excluded for housing so that it could form a green corridor due to landscape issues. A green corridor next to the busy main road

would encourage and cause wildlife, like hedgehogs, to be harmed. It would be far more beneficial to base a green corridor on the chalk stream.

If there were to be potential housing allocated, the Lower Field would be the preferred site. The Amberley Society would not object to small-scale development of Affordable Housing and smaller units on the lower field provided the following could be met.

- Suitable and effective buffer zone for the chalk stream.
- Flood prevention measures put in place.
- Direct access off the B2139.
- Space made available next to the car park for a new Community Centre which is an aspiration of the Amberley Neighbourhood Plan.

7. Conclusion

The Amberley Society strongly objects to the LAA proposal for 25-45 new homes on the East Street Farm fields for the above reasons. We cannot see how the LAA proposal meets with numerous policies and the stated purposes of the SDNP to further conserve and enhance.

There are significant material reasons why we do not believe the allocation of this site is suitable and ask that full and due regard is given to them. We respectfully ask that the allocation is withdrawn.

Appendix 1 – Amberley Chalk Stream Report – Alex Briggs.

Appendix 2 – Unsuitable Access Route – Supporting images.