

I object to the principle of development for the following reasons:

- Urban development within a protected national landscape (NPPF 190, DP16, EG1, Countryside and Rights of Way Act (2000) 85)
- Deterioration of Ancient Woodland by light pollution and by damaging roots and understorey on account of headwall construction (NPPF 193)
- Location within a dark sky sensitive area (Planning Technical Advice Note, DP29)
- Substantial adverse landscape effects (DP6, DP12, DP15, DP16)
- Engineered SuDS approach with no landscape or biodiversity value (DP41)
- No open space provision (DP24)
- Private gardens backing onto mature trees placing them at risk of future pressure for lopping or felling.

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1. Point 4.34 of the planning statement is not concurred with in relation to the SHELAA Site 198 assessment, as 45 homes is **not modest in scale** in the context of the settlement, and does represent major development.
 2. Further, the proposals do not conserve the intrinsically rural landscape character, as evidenced by the **substantial adverse landscape effects** as concluded within the LVIA. Despite these conclusions I have various rebuttals including:
 - a. The Site's 'proximity to built development' does *not* detract from its overall scenic and perceptual qualities, and as seen in the viewpoints, is barely perceived. Further, the Sunnyside Recreation Ground acts as a landscape buffer, separating the residential, built up area of East Grinstead from the HWNL.
 - b. The site shares many valued elements of its National Landscape, which should have been regarded as a separate landscape receptor.
 - c. It *does* have intrinsically dark night skies as is typical of the National Landscape, and the proposals will give rise to abnormal night time effects. See the attached photos below, taken from Dunnings Road, representing the last street lights of the settlement adjacent to the dark skies behind. The 'context of existing lighting within the neighbouring buildings and residential areas' is not experienced or concurred with.
 - d. The effects on trees will *not* be beneficial, particularly given the introduction of lighting and its disruptive effects on photoperiodism.
 - e. There *will* be impacts on the watercourse on account of drainage proposals as well as significantly increased impermeability.
 - f. While the visual effects are localised, that doesn't negate the substantial adverse landscape effects and erosion of rural character. Further, the site is *not* visually contained, particularly in the southern half of the site.
 3. The proposed site falls within the High Weald National Landscape, a protected national landscape. Standing advice for developments within the HWNL is set out under paragraph 189 of the NPPF: 'great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes'. Paragraph 190 sets out that, 'permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest'. **This development does not meet the exceptional tests that would justify its location within the HWNL.**
 4. DP16 states that development within the HWNL (previously AONB) will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan. **Proposals do not demonstrate that they conserve or enhance natural beauty, and there is no acknowledgement of the HWNL Management Plan, which should explain**

how proposals meet or conflict with objectives.

5. Paragraph 193(c) of the NPPF sets out that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland (AW) and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. **The proposals are not considered to meet such exceptional reasons and furthermore will result in loss or deterioration**, as set out in government guidance, by:
 - a. Increasing levels of light pollution
 - b. Damaging or compacting soil
 - c. Damaging roots and understorey (please note that while boring is proposed for drainage into AW, the headwall still requires **significant excavation within AW**, thus disturbing the soils that form the irreplaceable habitat).
 5. The HWNL Dark Skies Planning Advice states that developments should be located away from dark sky sensitive areas, avoiding AW in particular.
 6. While of lesser concern than the principle of development, there are also issues pertaining to the layout involving gardens backing onto mature trees, and that the proposals do not appear to meet open space requirements.
 7. SuDS are also solely end-of-pipe, engineered solutions with no landscape or ecological value.
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Dark night skies character, with street lighting at the edge of the settlement - see point 2.c. Taken from Dunnings Road, 23rd Jan.



Views from Sunnyside Recreation Ground during very limited rainfall on 22nd Jan. Flooding in the same location as the proposed affordable housing.

Happy to provide full resolution photos and details on request.