



Planning Statement

Juhring and Hobbs field, Saint Hill Road, East Grinstead

MSDC Ref: DM/25/2223

April 2026

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Executive Summary

Further and additional information is being submitted to Mid-Sussex District Council to explain the proposals that have been made in relation to Juhring and Hobbs Fields at Saint Hill Manor. This is to provide absolute clarity as to the nature of the proposals which are for temporary uses on the land but with permanent below ground and limited above ground infrastructure.

Full details of the proposed use are included in this submission. As previously discussed with Eric Owens and Steve Ashdown, we consider it is necessary to alter the proposed description of development and would suggest the following wording:

“Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing (cellular paving grid) to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure and concrete ring together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days per year) and overflow car parking for the Church and neighbouring sports clubs consisting of reinforced ground surfacing (cellular paving grid) for up to 683 car spaces (comprising up to 113 cars (Area A) for no more than 30 days per annum, 313 cars (Areas A & B) for no more than 13 days per year and up to 683 cars (Areas A, B & C) for no more than 7 days per year), construction of a new access and internal road, sustainable surface water and foul drainage provision, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

We understand that the Council considers the development to be major development within the National Landscape and we consider that we can demonstrate the exceptional circumstances sufficient to pass the test in paragraph 190 of the NPPF.

The NPPF states that consideration of such applications should include an assessment of “the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy”.

The economic and social contribution of the IAS Annual Anniversary Events over the last 40 years is substantial. An independent Economic and Employment Impact Assessment (Marshall Regen Ltd., January 2026) found that the 2025 event generated a gross positive economic impact of £6.96 million within East Grinstead, £11.3 million across Sussex (including East Grinstead), and £21.71 million nationally. Additionally, it sustains 287 gross jobs across the UK, including 92 within East Grinstead.

The event also attracts a high proportion of international attendees (over 47%) which is higher than the UK event average at c33% as stated in the Visit Britain Business Event Delegate Survey Report, 2025 supporting local hotels, hospitality, transport services, and visitor attractions, particularly valuable given its timing in October, outside the main tourist season.

In February 2026, Marshall Regen Ltd also undertook a study to compare the IAS 2025 Annual Anniversary Event delegate spending against all UK events data published in the Visit Britain Business Event Delegate Survey Report, 2025 delegates attending the IAS

Event spent more per trip (+ £805) and more per night (+ £149) than the average that delegates spent at all UK events. The main difference is in the much higher spending by overseas delegates at the IAS Annual Anniversary Event compared with delegates at all UK events (+ £954 per visit).

The scheme will also deliver considerable landscaping and ecological enhancement, resulting in significant biodiversity net gains, significantly in excess of the statutory 10% and environmental enhancements. This is a matter we give significant weight in favour of the application proposals.

The Proposed Development will not result in significant harm in the long term, and it can be successfully integrated into the locality. In our view, even if the localised and minimal landscape harm were to be accepted it would be nowhere near significantly and demonstrably outweighing the substantial public benefits identified through permitting the scheme.

Accordingly, we consider that planning permission should be granted for the proposed development.

1. Introduction

- 1.1 This Planning Statement has been prepared by DMH Stallard LLP on behalf of the applicants, The Church of Scientology Religious Education College Inc (hereafter COSRECI) to explain the additional and revised information being submitted to Mid-Sussex District Council in relation to the planning application (MSDC ref: DM/25/2223) submitted by Carnegie Group in September 2025 in relation to the Juhring and Hobbs Field, Saint Hill Manor, Saint Hill Road, East Grinstead.
- 1.2 The description of development currently reads as follows: *“Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”*
- 1.3 The applicants and their consultant team have previously reviewed the various replies from statutory and other consultees, responses to which are provided at **Appendices 1 to 12** respectively of this Planning Statement and, having also discussed matters with officers, now wish to make further revisions and submissions in relation to the scheme and to respond to the various consultee replies.
- 1.4 In addition to this Planning Statement, the documentation being submitted comprises the following:
- Covering letter including at Appendix 1, responses to all of the queries raised by the case officer in his email dated 16.03.26
 - Revised application form given the change to the proposed description of development.
 - Revised planning drawings
 - The Economic & Employment Impacts of the International Association of Scientologists (IAS) 2025 Annual Anniversary Event, January 2026 prepared by Marshall Regen Ltd.
 - Economic and Employment Benefits of Short Events in Sussex and Beyond - A Comparator Report, February 2026 prepared by Marshall Regen Ltd.
- 1.5 Following the recent discussions held with officers, the previously proposed 113 hard surfaced car park is now proposed to be finished in the same cellular paving

grid as the remainder of the temporary parking on Juhring Field. A key issue that had previously emerged is the impression that many appear to have, that the proposals seek to use the formerly proposed 570 space car park on a consistent and regular basis whereas that is not the intention at all. As is explained in further detail in this Planning Statement and the updated Design and Access Statement prepared by the Carnegie Group, it is only proposed to use the total 683 spaces available for a total of up to 7 days in any calendar year, most particularly during the International Association of Scientologists event which is held in October.

- 1.6 In light of this clarification over the proposed use of the car park, the applicants wish to amend the proposed description of development to the following to better describe what is being applied for.

“Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing (cellular paving grid) to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure and concrete ring together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days per year) and overflow car parking for the Church and neighbouring sports clubs consisting of reinforced ground surfacing (cellular paving grid) for up to 683 car spaces (comprising up to 113 cars (Area A) for no more than 30 days per annum, 313 cars (Areas A & B) for no more than 13 days per year and up to 683 cars (Areas A, B & C) for no more than 7 days per year), construction of a new access and internal road, sustainable surface water and foul drainage provision, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

2. Clarification of frequency of events and use of car parking

- 2.1 We wish to make the terms of the planning application absolutely clear to all parties. Planning permission is being sought for the following:

1. The erection, use and subsequent dismantling of the three tents (temporary event tent, temporary catering tent and temporary seminar tent) on Hobbs Field to be used during the 3-day IAS Anniversary Event held in October every year. Given the lengthy build time, permission is sought to allow these works to take place for no more than 84 days (12 weeks) in any calendar year. It is important to note that the actual time required for the erection, use and dismantling of the tents, with the new infrastructure, is 10 weeks. This is reduced from the current 19-23 weeks from the beginning of laying trackway to the full removal of it. 12 weeks has been requested in case of unpredictable weather or any unforeseen circumstances. Every year, after the night of the final event (Charity Concert on the Sunday), the marquees will immediately start being dismantled and will be removed within 2 weeks,

returning the field to its natural state. There is no intention to use the marquees at any other time of the year than for the 3-day annual October IAS Anniversary Event.

2. The installation of permanent infrastructure to support the erection of the tents on Hobbs Field in form of a ring beam and provision of Cell Pave HD filled with grass on Hobbs Field.
3. The provision of a new access road across Juhring Field finished in gravel off the main site access road and access road opposite Rockwood Park. This area will also be used for bus and taxi drop off and collection, facilitating greater use of non-private car transport to the property.
4. The installation of a cellular paving grid under Juhring field to provide a solid base to allow temporary parking in connection with the various events as listed in the table on pages 11 and 20 and on the respective areas shown page 21 of the enclosed Design and Access Statement:
 - a maximum of 30 days in any calendar year with use of up to 113 spaces on Area A
 - a maximum of 13 days in any calendar year with use of up to 313 spaces on Areas A and B, and
 - a maximum of 7 days in any calendar year with use of up to 683 spaces on Areas A, B and C.

The only reason we are asking for a total of 50 days of use is to ensure we do not need to come back to MSDC.

5. The erection of a generator enclosure (marked as 9 on Site Plan drawing 1093 060 Rev N) and Washroom building (marked as 10 on Site Plan drawing 1093 060 Rev N).
- 2.2 In light of the above, it is important to recognise and acknowledge that the Hobbs Field section of application site will not be used for some 40 weeks of the year and will be simply a field. In similar terms, the temporary car park will not be used for 315 days of the year and will also simply be in use as a field.
 - 2.3 Full details of the proposed uses and the events that will be served are included in the updated Design and Access Statement.

3. Assessment against Planning Policy

- 3.1 This section sets out relevant planning policy, which includes both government and local policy, and demonstrates how the development proposal performs in relation to compliance with individual policies. The overall compliance of the development proposal with the development plan, as a whole, is considered within Section 5, Planning Balance.

- 3.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies in the Development Plan, unless other material considerations indicate otherwise.
- 3.3 The key policies in relation to development of the application site are those relating to the High Weald National Landscape (AONB). Guidance is contained within the NPPF (2024) and the Mid Sussex District Plan.

National Planning Policy Framework 2024

- 3.4 The NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things:
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- 3.5 The NPPF goes on to indicate that *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.... The scale and extent of development within all these designated areas should be limited... designed to avoid or minimise adverse impacts on the designated areas.'*
- 3.6 The NPPF states that when considering applications for development within National Landscapes, 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. Consideration of such applications should include an assessment of:
- (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - (b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

- 3.7 The NPPF has been written with the aim of achieving ‘sustainable development’, reflecting what is the main purpose of the planning system and promoting a responsive and competitive economy, a social objective to support strong, vibrant and healthy communities, and an environmental objective to protect and enhance our natural, built and historic environment.
- 3.8 The development proposal meets the three overarching objectives of the planning system. The economic objective is met through the huge religious, educational and cultural benefits of the proposal. The financial impact in the local and wider economy through international tourism contributing significantly to the economic growth of east Grinstead and the surrounding National Landscape.
- 3.9 This links directly to the social objective with up to 7,000 visitors to the annual IAS Event per year which will comprise adults and children, and national and international visitors. Importantly, the proposed development will meet the environmental objective. The landscape-led design reflects the site’s location in the High Weald National Landscape and the setting of local Heritage assets, both on and off site.
- 3.10 The natural environment will be protected and enhanced, with a net gain in biodiversity. The proposed development will, therefore, comprise sustainable development which is at the heart of the framework.

District Plan Policy

- 3.11 District Plan Policy DP16: provides guidance at a local level in relation to the High Weald National Landscape (formerly AONB).
- 3.12 In Mid Sussex the High Weald National Landscape covers most of the northern part of the district. The High Weald AONB Management Plan identifies the distinctive features of the landscape and how these can be conserved and enhanced.
- 3.13 The policy basis is the strategic objectives of protecting valued landscapes for their visual, historical and biodiversity qualities; as well as supporting and enhancing the attractiveness of Mid Sussex as a visitor destination.
- 3.14 Policy DP16 states that development will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;
- the identified landscape features or components of natural beauty and to their setting;
 - the traditional interaction of people with nature, and appropriate land management;
 - character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and

- the conservation of wildlife and cultural heritage.

Consideration of Major Development

- 3.15 The NPPF is clear that major development is a matter for the decision maker and that the nature, scale and setting of the proposed development is taken into account, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.
- 3.16 We understand that the Planning Authority considers that the application proposals comprise major development in the National Landscape. We consider that there are exceptional circumstances, and it can be demonstrated that the development is in the public interest.
- 3.17 This is due to the need for the development, including in terms of;
- a) any national considerations, and the impact of permitting it, or refusing it, upon the local economy (see economic statement and further information below);
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; (this is not practical given the infrastructure at Saint Hill and the inevitability that the event would move to the USA if this permission were to be refused) and there is no venue in the local area that would hold 7.000 people.
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated (the current scheme, as further revised, limits the use to a temporary period with minimal above ground permanent development and consequently very limited landscape harm).
- 3.18 The NPPF states that consideration of such applications should include an assessment of “the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy”.
- 3.19 The economic and social contribution of the IAS Annual Anniversary Events over the last 40 years is substantial. The independent Economic and Employment Impact Assessment (Marshall Regen Ltd., January 2026) which is included in the application submission found that the 2025 event generated a gross positive economic impact of £6.96 million within East Grinstead, £11.3 million across Sussex (including East Grinstead), and £21.71 million nationally. Additionally, it sustains 287 gross jobs across the UK, including 92 within East Grinstead.
- 3.20 The event also attracts a high proportion of international attendees (over 47% which is higher than the UK event average at c33% as stated in the Visit Britain Business Event Delegate Survey Report, 2025) supporting local hotels, hospitality, transport services, and visitor attractions, particularly valuable given its timing in October, outside the main tourist season.

- 3.21 In February 2026, Marshall Regen Ltd also undertook a study which is also included in the application submission to compare the IAS 2025 Annual Anniversary Event delegate spending against all UK events data published in the Visit Britain Business Event Delegate Survey Report, 2025, delegates attending the IAS Event spent more per trip (+£805) and more per night (+£149) than the average that delegates spent at all UK vents. The main difference is in the much higher spending by overseas delegates at the IAS Annual Anniversary Event compared with delegates at all UK events (+£954 per visit).
- 3.22 The IAS was founded at Saint Hill on 7 October 1984. An anniversary event has been held every year since. It used to be held around the world, as well as at Saint Hill, until 1996. Since 1996 it has been held at Saint Hill every year, except 2014 where it was held in Clearwater when their new Spiritual Headquarters opened. And over Covid (2020, 2021, 2022). So, for 30 years it has been held at Saint Hill (bar those 4 years). It has been held at Saint Hill 29 times in total.

4. Responses to queries and consultee comments

- 4.1 It is acknowledged that the case officer has raised various queries in relation to the previous submission made at the end of February 2026 which were included in his email dated 16.03.26. Responses to these various queries and request for further information are set out in Appendix 1 to the covering letter to these revisions.
- 4.2 In light of the request of officers to remove the previously proposed hard surface finish to the Area A car park, a full set of revisions are necessary to the scheme and revised plans and reports are included in this submission as listed in our covering letter to the revisions.
- 4.3 The applicants acknowledge that there have been a number of comments submitted by consultees to the application proposals and as agreed with officers, we previously prepared responses to each of these in February 2026 when the application proposals included the permanent car park proposal on Area A as shown on page 21 of the enclosed Design and Access Statement. The original responses from consultees and the respective replies to these are contained in **Appendices 1 to 12** as follows:

Appendix 1 - MSDC Conservation Officer comments dated 17.10.25 and WS Heritage response.

Appendix 2 - MSDC Tree Officer comments dated 29.01.26 and response from PJC Consultancy

Appendix 3 - High Weald Joint Advisory Committee comments dated 09.02.26 and response from Enplan

Appendix 4 - West Sussex County Council Highways Authority comments dated 02.02.26 and Pelham Transport Consulting Response

Appendix 5 - West Sussex County Council Lead Local Flood Authority comments dated 26.09.25 and response of QED Structures

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Appendix 10 - MSDC Environmental Protection comments dated 17.09.25 as updated on 24.12.25 and response from applicants

Appendix 11 - West Sussex County Council Minerals and Waste team comments dated 25.09.25 and response from Soil Technics

Appendix 12 - West Sussex Fire & Rescue Service comments dated 15.12.25 and response from Carnegie Group

5. Conclusions and Planning Balance

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be made in accordance with the development plan unless material considerations indicate otherwise. However, it is important to note that if a scheme is non-compliant with some development plan policies it does not mean that a scheme cannot be in accordance with the development plan as a whole.
- 5.2 We are aware that the Local Planning Authority has taken the view that the scheme should be considered as being a major development and so for the reasons set out in paragraphs 3.15 to 3.22 above, we consider that we demonstrate exceptional circumstances sufficient to pass the test in paragraph 190 of the NPPF.
- 5.3 The NPPF states that consideration of such applications should include an assessment of “the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy”.
- 5.4 The economic and social contribution of the IAS Annual Anniversary Events over the last 40 years is substantial. An independent Economic and Employment Impact Assessment (Marshall Regen Ltd., January 2026) found that the 2025 event generated a gross positive economic impact of £6.96 million within East Grinstead, £11.3 million across Sussex (including East Grinstead), and £21.71 million nationally. Additionally, it sustains 287 gross jobs across the UK, including 92 within East Grinstead.

- 5.5 The event also attracts a high proportion of international attendees (over 47%) which is higher than the UK event average at c33% as stated in the Visit Britain Business Event Delegate Survey Report, 2025 supporting local hotels, hospitality, transport services, and visitor attractions, particularly valuable given its timing in October, outside the main tourist season.
- 5.6 In February 2026, Marshall Regen Ltd also undertook a study to compare the IAS 2025 Annual Anniversary Event delegate spending against all UK events data published in the Visit Britain Business Event Delegate Survey Report, 2025 delegates attending the IAS Event spent more per trip (+ £805) and more per night (+ £149) than the average that delegates spent at all UK events. The main difference is in the much higher spending by overseas delegates at the IAS Annual Anniversary Event compared with delegates at all UK events (+ £954 per visit).
- 5.7 The scheme will also deliver considerable landscaping and ecological enhancement, resulting in significant biodiversity net gains, well in excess of the statutory 10% and environmental enhancements. This is a matter we give significant weight in favour of the application proposals.
- 5.8 The Proposed Development will not result in significant harm in the long term, and it can be successfully integrated into the locality. In our view, even if the localised and minimal landscape harm were to be accepted it would be nowhere near significantly and demonstrably outweighing the substantial public benefits identified through permitting the scheme.
- 5.9 Accordingly, we consider that planning permission should be granted for the proposed development.

MSDC Conservation Officer comments dated 17.10.25 and WS Heritage response

From: Emily Wade <Emily.Wade@midsussex.gov.uk>
Sent: 17 October 2025 10:38:47 UTC+01:00
To: "Andy Watt" <Andy.Watt@midsussex.gov.uk>
Subject: DM/25/2223 Saint Hill Manor

Hi Andy

Comments on the above planning application.

The site and proposed development

The proposed development site consists principally of two large fields to the north and west of Saint Hill Manor, which is located in a rural position outside East Grinstead. The Manor, which is currently the UK headquarters of the International Association of Scientologists, includes a complex of buildings of varying dates centred on a Grade II 18th century country house. The current proposal, which follows on from pre-application advice, is for the following works associated with events held at the Manor:

- Creation of a car parking area occupying Juhring Field (to the north of the Manor), to provide 760 parking spaces, with permanent hard surfaced parking to the north east and east of the field, and a larger area of temporary cell-web surfaced parking to the centre and south-western parts of the space;
- Provision of a WC block centrally, between the permanent and temporary parking areas;
- Provision of lighting to the permanent parking area;
- Alterations of the existing vehicle access to the northern end of the road frontage including removal of adjacent hedging and trees to create appropriate visibility splays;
- Creation of an asphalt and gravel surfaced access road running along the northern side of the field around the western edge of North Wood and continuing along the western and southern sides of Hobbs Field;
- Partial regrading of Hobbs field and introduction of concrete ring beams/pads;
- Introduction of large areas of cell-web surfacing within Hobbs Field; and
- A WC block to the eastern side of this field, with adjacent to this an emergency generator and substation.

Affected heritage assets

The proposal is considered to affect the settings of a number of heritage assets, including both listed buildings and non-designated heritage assets (NDHAs):

- Saint Hill Manor.

As above, Saint Hill Manor is a Grade II listed neo-classical country house, constructed in 1792 and extensively altered in the 19th century. Originally known as Saint Hill House, the building was constructed in 1792 for Gibbs Crawford, an MP, and had several subsequent notable owners before being requisitioned during World War II for use as a convalescent home for RAF officers undergoing

reconstructive surgery at East Grinstead's Queen Victoria Hospital- the famous 'Guinea Pig Club' associated with pioneering surgeon Sir Archibald McIndoe. In 1959 it was purchased by L Ron Hubbard, founder of the scientology movement. The interior of the building includes the 'Monkey Room' which was painted with an elaborate mural showing 20 different species of monkey in 1945 by Winston Churchill's nephew John Spencer Churchill.

The building is set within landscaped gardens, which include a number of other buildings of varying dates. Beyond these immediate grounds, the setting of the house remains largely rural in character.

Based on the limited information in front of us, the house is likely to be considered to possess architectural interest based on its design, construction, craftsmanship and decoration, historical illustrative value as a good example of a substantial late 18th century country house in the neo-classical style, aesthetic value, and associative value in relation to its various notable occupants and association with both the pioneering work at Queen Victoria Hospital during WWII, and later Scientology. The house also has group value with surviving historical buildings around it within the manor grounds, including the former stables to the south east, and the lodge building adjacent to the entrance driveway to the north, as well as a further lodge building to the east, which would be regarded as curtilage listed.

As such, the surviving rural setting of the Manor would be considered to make a strong positive contribution to its special interest and the manner in which this is appreciated, in particular those parts of that interest which are drawn from historical illustrative and aesthetic values. The proposed development affects fields constituting the immediate rural setting of the Manor to the north and west of its gardens.

- North Lodge

North Lodge is a characterful small building located to the north of the Manor, adjacent to the principal entrance to the gardens. It appears, from historical map regression, to date from the late 19th century, and retains a number of period features such as a projecting gabled porch with stone detailing, a prominent corbelled brick chimney stack, and Gothic style windows with pointed heads, stone drip moulds, and casements with elaborately patterned leaded lights. Given its date of construction, proximity to the Manor, common ownership, and historical and continuing functional relationship, the building would be regarded as curtilage listed.

Based on the information in front of us, the Lodge would be likely to be considered to possess architectural value based on its design, construction and craftsmanship, historical illustrative value as a good example of a late 19th century country estate lodge house, aesthetic value, and group value with the Manor house and other surviving historical estate buildings.

In terms of setting, the relationship of the Lodge with the entrance drive, which largely retains its historical configuration, and the remainder of the grounds of the Manor will be significant in contributing to an understanding of its historical function. However, the wider rural setting, including the field directly to the west (Juhring Field), will also make a strong positive contribution to the special interest of this curtilage listed building, in particular its historical illustrative value as part of a country estate, and its aesthetic value.

Listed buildings and NDHA at Saint Hill Green

Saint Hill Green is located a short distance to the south of the main entrance to Saint Hill Manor, along Saint Hill Road. There are a number of listed buildings grouped around the Green- these are early 19th one storey ashlar faced cottages, and include Thetania (no.1 Saint Hill Green), Vittoria Cottage (3) and 4 Saint Hill Green, and 6 and 7 Saint Hill Green. The buildings are similar in period and style and may have been constructed as part of a small planned development, possibly by the Saint Hill estate. They are likely to be considered to possess architectural value based on their design, construction and craftsmanship, historical illustrative value as good examples of rural Sussex cottages of their period, possibly forming part of a planned country estate development, and aesthetic value. They also possess group value with each other and possibly (depending on confirmation of the manner of their development) with other surviving historical buildings within the Saint Hill estate, including the Manor.

Also forming part of this grouping, but not listed, is Gabriels, a further stone built building which was constructed (from historical map regression) in the mid 19th century or earlier as a Boys and Girls School. Again, it is interesting to speculate whether this may have been part of a planned development by the Saint Hill estate. In any case, the building, which retains a number of attractive period features, is of some age and character, and has group value with the adjacent listed cottages, which appear to be similar in date. I would regard it as a building of historical and architectural interest within the local context, i.e. as a non-designated heritage asset.

This building would appear to possess architectural interest, historical illustrative value as a good example, in the local context, of a small early-mid 19th century rural school, possibly part of a planned estate development, and aesthetic value. As above it also has group value with the listed cottages around Saint Hill Green, and potentially with other surviving historical buildings within the Saint Hill Estate.

The surviving rural setting of these buildings, including the generally rural character of the approach to Saint Hill Green along Saint Hill Road, makes a strong positive contribution to their significances and how these are appreciated,

in particular those parts of their significances which are drawn from historical illustrative and aesthetic values.

- Rockwood Park

Rockwood Park, formerly known as Fonthill, and originally as Rockwood, is a substantial building located opposite to the northern part of the site, on the eastern side of Saint Hill Road. The building appears to have been originally constructed as a country residence named Rockwood around the mid- 19th century. A large extension to the northwest was added in the later part of that century, and in 1886 the house was converted for use as an upmarket preparatory school, and was renamed Fonthill. The school closed in 1985 and the building is now understood to be under the ownership of IAS.

The building has considerable character, and retains numerous period features including (particularly to the earlier wing) elevations enlivened with gabled porches, projecting canted bays with pierced parapets, triple Venetian windows with Gothic arched heads and drip moulds, projecting oriel windows, and a small turret.

Based on its age and its surviving architectural character, I would consider that Rockwood Park should be regarded as a non-designated heritage asset (NDHA). I would include within this designation a small building surviving to the road frontage just to the north west of the house, which would appear to be a former stables or similar, as well as the former school chapel which survives as a residential conversion a short distance to the south east within this designation, although this latter building is not in itself as affected by the proposal as the former house/school and stables. All three buildings will possess architectural value based on their design, construction and craftsmanship, as well as historical illustrative value as good examples in the local context of 19th century buildings associated with an upmarket preparatory school created from a country house of some pretension, and aesthetic value.

Although I have not had access to the property from images available on the internet and aerial imagery it appears that Rockwood Park sits in landscaped grounds (although these have been impinged upon by extensive car parking to the frontage). These will contribute positively to the appreciation of its significance as a former country house/prep school. The surviving wider rural setting of the house and associated buildings will also make a positive contribution in this respect. Juhring field, being the greater part of the setting to the east and southeast of the former house and stables, will be of particular importance in this respect.

Impact of the pre-application proposal

The proposed works to the two fields are different in nature.

Juhring Field

In respect of Juhring Field, the proposed introduction of car parking throughout the space will have a marked impact on its character, which will be altered from an open, essentially rural field to a partly hard surfaced car park of 760 car spaces. Although it is noted that the majority of the field would be cell web rather than asphalt, the hard surfaced area is quite extensive, is located adjacent to the road and to the main entrance to Saint Hill as well as the proposed altered vehicle entrance from this road, and it's the urbanising impact of the hard surfaced car park will be exacerbated by the provision of lighting columns, e.v. charging points and other paraphernalia. The plastic cellweb structure although it is designed to allow grass to grow through it is also an artificial material and is likely to have an adverse visual impact on the rural character of the field, particularly when the grass is mown short for events and/or during prolonged dry periods. The adverse impact on this part of the field will be intensified by what appears on plan to be permanent hard landscaped divisions between the parking lanes. It is not clear how individual bays and/or directions of travel are to be demarcated, and it would be helpful if this could be further clarified.

In terms of the lighting, this appears to be proposed only to the permanent parking area and consists of a number of 6m high columns as well as combined e.v./lighting pillars. From the submitted lighting strategy the resulting level of illumination of the area appears fairly intensive, and will have a further urbanising impact on the character of the field, particularly at night. In terms of understanding the visual impact of the fittings themselves in daytime, it would be useful if these could be clearly and individually marked on the submitted landscaping plan, with accompanying notes showing the appearance of each fitting type in the key. This will allow a clearer understanding of the cumulative appearance of the various works within the area.

The proposed new WC block within the field is centrally located between the hard and cell-webbed surfaced areas. This is a relatively prominent position and will further detract from the currently rural character of the space.

The alterations to the existing vehicle access to the northern end of the road frontage include removal of adjacent trees and hedging to allow for improved visibility splays. Any significant loss of vegetation to either side of the entrance, or enlargement of the access itself will be considered to adversely affect the rural character of Saint Hill and the positive contribution this makes to the settings of the above-mentioned heritage assets. However, the information in front of us is currently insufficient to allow a fully informed consideration of this aspect of the proposals. I would suggest that the applicant should be requested to provide fully detailed existing and proposed plans of the entrance layout and adjacent frontage, detailing any changes to the extent and nature of the access and its surfacing, as well as any vegetation which will be lost. Existing and proposed elevations of this part of the road frontage should also be provided.

In addition, the proposed hard surfaced access road across the northern side of the field will further detract from its currently rural character.

Further to the above physical alterations to the space and the associated visual impacts, there will also be a marked increase in noise and business to the area, particularly when the temporary car parking is also in use. This will exacerbate the harm caused to the rural character of the setting of the affected assets.

Therefore although I note the revisions which have been made to the scheme including the reduction in the area of hard landscaping and the introduction of some areas of planting, it remains my opinion that in combination, these works will remove and reverse the positive impact which Juhring Field currently makes, through setting, to the significances of the various heritage assets identified above.

Although without the above mentioned further information it is not possible to comment very precisely on the level of harm that will be caused (which will vary in any case from asset to asset), I would suggest that in all cases the harm caused to the designated assets will be less than substantial, such that the balancing exercise set out in paragraph 215 of the NPPF will apply, bearing in mind also the requirement of paragraph 212 that: *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'* In respect of the NDHAs, paragraph 216 of the NPPF applies.

Broadly speaking, I would expect the impact on each asset of this aspect of the scheme to be as follows (subject to adjustment on receipt of the above-mentioned further information):

- Saint Hill Manor- Less than substantial harm, at the mid-high end of that scale. Although there may not be direct intervisibility between the house and the field, the field forms a significant part of the wider rural setting within which the Manor is appreciated, and particularly affects the character of the approach to it via the historic entrance and driveway through the grounds which are directly adjacent to the site. There are also a number of viewpoints within the grounds from which views of both house and site can be appreciated (albeit looking in opposing directions), the impact on which will directly affect the verdant context within which the listed building is currently appreciated.
- North Lodge- Less than substantial harm, at the higher end of that scale. Juhring Field is directly adjacent to the Lodge and provides a very significant part of its setting. There is clear and direct intervisibility between the site and the Lodge. The impact on the context within which this building is appreciated will be fundamentally altered by the current proposal from a discernible surviving, albeit altered, country estate, to a much more suburban context. This harm is exacerbated by the placement of the hard landscaped permanent parking area and associated works including lighting and the WC block directly adjacent to the Lodge.
- Listed buildings and NDHA around Saint Hill Green- Listed buildings, less than substantial harm, at the lower end of that scale. For the NDHA, which I would

consider (based on the limited information in front of us) to be of a moderate level of interest in the local context, again a low level of harm. The impact on all of these assets is to the character of the approach to Saint Hill Green along Saint Hill Road. The application site is a significant in scale, directly adjacent to Saint Hill Road and would be fundamentally altered in character from rural to suburban; however is at a short distance from Saint Hill Green with no intervisibility between the two. Again, the placement of the permanent car parking directly adjacent to Saint Hill exacerbates this harm. The further information regarding the alterations to the northern vehicle entrance will be relevant here.

- Rockwood Park. A high level of harm to an NDHA of a mid level of interest in the local context. The application site is directly opposite the house at Rockwood Park and diagonally opposite the former stables. It forms a very significant part of the setting of these buildings, with direct intervisibility between the two and a strong impact on the character of the immediate approach to the NDHA along Saint Hill Road. The transformation of the field to an extensive car park will have a significant adverse impact on the setting of these buildings. Again, the placement of the permanent car parking is relevant, as will be the alterations to the northern vehicle entrance, which is directly opposite Rockwood Park.

Hobbs Field

This field is set away from Saint Hill Road and screened from it by woodland and existing buildings around Saint Hill Manor. I would therefore not consider that the proposed works here will materially affect the settings majority of the assets described above, although they will impact on the setting of the Manor itself, which is only a short distance to the east. Although direct intervisibility will be limited, the field has a fairly significant impact on the character of the setting of the Manor complex and its immediate grounds, and will contribute strongly to visitors' impression of the rural landscape within which the Manor currently sits.

The proposed works within this field are less intensive than for Juhring field, but will undoubtedly affect its currently verdant and largely undeveloped character. The introduction of the hard surfaced access road, large areas of cell-web surfacing, concrete ring beams and pads for the erection of a large marquee, as well as new built form consisting of a WC block, generator and substation to the eastern side of the field, and the partial regrading of the field, will have a potentially significant cumulative impact on the character of the space, even when the marquee is not present. In combination, these works will detract from the historic appearance of the area as an agricultural field- it will become quite apparently an event space.

This will detract from the positive contribution which the site currently makes through setting to Saint Hill Manor. Again, I would place the harm caused as less than substantial, at the mid-range of that scale.

Cumulatively, the impact of the works to both fields on Saint Hill Manor will therefore be at the mid-high end of the less than substantial scale.

As submitted, the proposal will also be considered contrary to the requirements of District Plan Policy DP34 (Listed Buildings and Other Heritage Assets) which states that development will be required to protect listed buildings and their settings.

Thanks,

Emily

Please note that this advice is given at Officer level only and is without prejudice to the formal decision of the District Council.

Submit your planning application online.
<http://www.planningportal.gov.uk>

Emily Wade Ma MSc
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Planning Services
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or call 0800 328 0280



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of MSDC Conservation Officer

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find attached a response prepared by WS Heritage to the comments of the Conservation Officer, Emily Wade in her response on the application dated 17 October 2025.

We would also ask the Conservation Officer to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no

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more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

Can you please reconsult the Conservation Officer with this response.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

FAO Rob Thompson
Saint Hill Manor
Saint Hill Road
East Grinstead
West Sussex
RH19 4JY

27th February 2026

WSH Job Ref: Joo5039

Dear Mr Thompson,

Re: JUHRING AND HOBBS FIELD AT SAINT HILL MANOR, SAINT HILL ROAD, EAST GRINSTEAD, WEST SUSSEX

I write with respect to the above. Concerning which, you have instructed WS Heritage Ltd to address proposals for a development at Juhring and Hobbs Field, Saint Hill Manor, East Grinstead. This site is the subject of an ongoing planning application under local authority reference DM/25/2223. The description of the development is as follows:

'Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)'

WS Heritage submitted Joo5039 - *Heritage Impact Assessment - Car Park & Events Field, Saint Hill Manor 23.10.25* with the initial application material and a revised document Joo5039 - *Heritage Impact Assessment - Car Park & Events Field, Saint Hill Manor 18.11.25*, addressing revised plans submitted by the applicant.

The Mid Sussex District Council Conservation Officer provided a consultation relating to the application on the 17th of October 2025. There are a number of points raised within this consultation that would bear further discussion and/or consideration. It should be noted that no updated comments have since been received from the Officer that refer to the revised application material submitted by the applicants.

Prior to the submission of the planning application, pre-application advice was sought from Mid Sussex District Council. As part of this advice, feedback was received from the council's Conservation Officer. The two consultations almost read almost verbatim with no reference to the Heritage Impact Assessment submitted alongside the planning application or subsequent amendments to the scheme. The consultation dated 17th October 2025 still refers to the scheme as a pre-application proposal.

The proposal is separated across two separate fields, Juhring Field and Hobbs Field. The Conservation Officer confirmed within their consultation that proposals for Hobbs Field would not have the potential to impact upon any of the heritage assets in question aside from Saint Hill Manor, of which we would agree. The proposal for each field was discussed separately. As such, we will address each section, below.

Juhring Field

Regarding comments referring to North Lodge, the Conservation Officer is of the opinion that this building comprises a curtilage listed structure, forming part of the Grade II designation of *Saint Hill Manor*. The submitted Heritage Impact Assessment by WS Heritage confirmed that the building is not in fact curtilage listed, however, it would appear some further explanation is required. According to *Historic England Advice Note 10 – Listed Buildings and Curtilage* there are three key factors to be taken into account in assessing whether a structure or object is within the curtilage of a listed building:

- *the physical layout of the listed building and the structure;*
- *their ownership, both historically and at the date of listing; and*
- *the use or function of the relevant buildings, again both historically and at the date of listing*

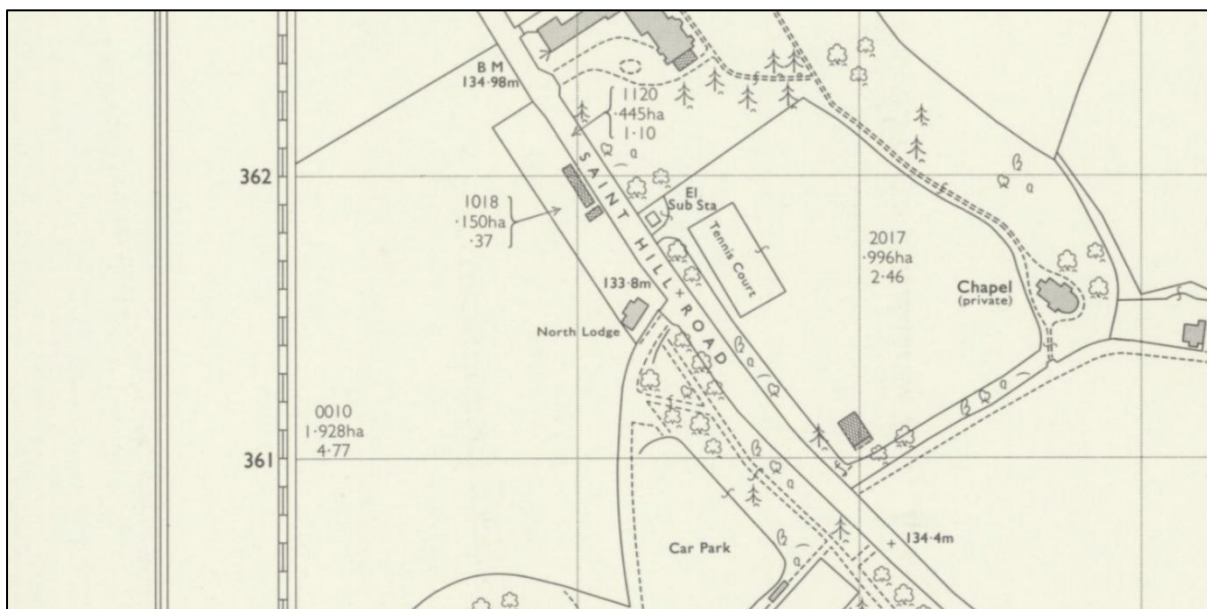


Figure 1: OS Map Extract North Lodge, 1970

North Lodge became fundamentally disconnected from Saint Hill Manor in 1959 when it was separated from the wider estate. A conveyance of the property occurred in 1959 between the Maharaja Sir Sawai Man Singh Bahadur, Broadland Properties Limited and Herbert Dennis Hall in May 1959 which resulted in North Lodge being separated from the estate and becoming a separate, private dwelling, no longer functioning as a lodge building as part of

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the estate (see attached **Appendix 1 & 2**). This event occurred just prior to the Maharaja selling the remainder of the estate to L. Ron Hubbard in August 1959.

Saint Hill Manor was first listed at Grade II on the 2nd of August 1972, therefore, North Lodge was not under common ownership and not in a function/use ancillary to the listed building at the time of listing. The property can also clearly be observed to have its own defined curtilage prior to the listing of Saint Hill Manor, as depicted by the Ordnance Survey map published in 1970 (**Figure 1**).

Whilst the building certainly pre-dates July 1948 according to the cartographic evidence, the structure was not under common ownership, had its own defined curtilage and was not in a use ancillary to that of the listed building at the time Saint Hill Manor was listed in 1972. Therefore, North Lodge is not considered to be curtilage listed and should not be treated as part of the listed building. Whilst there may be some confusion on behalf of the local authority as North Lodge is currently under common ownership with Saint Hill Manor in the present day, this was not acquired by the present estate until 2012, some 40 years after Saint Hill Manor's original designation.

Whilst North Lodge is not considered curtilage listed, it may possess a degree of architectural and historic interest and has the potential to be identified as a non-designated heritage asset of low significance. The development therefore has the potential to affect the setting of a non-designated heritage asset. However, as discussed above, this building has been fundamentally disconnected from its original, rear setting since 1959 when it was separated from the wider estate. Impacts upon the significance of this setting are therefore considered appreciably minor and will not affect the way in which the building is currently understood or appreciated.

If the officer is still of the mind that North Lodge comprises a curtilage listed structure, contrary to the guidance and evidence presented above, the harm to the setting of this building could not realistically be assessed as anything above a low degree of *less than substantial harm*. According to *paragraph 215* of the *NPPF*, this harm should be weighed against the public benefits of the proposal. The public benefits of the proposal are detailed in full within the planning statement prepared by DMH Stallard and are considered to be more than sufficient to outweigh a low level of *less than substantial harm*.

A number of assets are located to the far east of the application site at Saint Hill Green including the Grade II listed *Saint Hill Green* (No.1), *Saint Hill Green* (Nos. 3 & 4) and *Saint Hill Green* (Nos. 6 & 7). These assets have no direct intervisibility with the application site and are set within a defined, enclosed setting. Their wider, more open rural and agricultural setting is more readily experienced to the east. The approach towards these assets from the west along Saint Hill Road is a tight, enclosed country road with a bend lined with mature trees to either side.

The openness of the countryside is not experienced along this approach, neither is the application site readily experienced in conjunction with this setting, nor does it contribute towards our understanding of the heritage assets at Saint Hill Green.

Therefore, given the intervening distance, landscape topography and built form and distinct lack of intervisibility with the application site, it is not considered that proposals would have any meaningful impact upon the setting of these heritage assets which would remain fundamentally *preserved*.

Considering the setting of the potential non-designated heritage asset of Rockwood Park, this building is not appreciated in association with the history and function of Juhring Field to the south and is more readily appreciated within the confines of its own grounds. The setting of this building is formed from large swathes of hardstanding with little in the way of open fields and/or parkland.

The Conservation Officer confirmed that the assessment of this building was a purely desk-based exercise relying on aerial imagery and images from the internet. Rockwood Park does not sit within landscaped grounds. The only open green area is located to its southeast, which is isolated from the building, where its immediate grounds are characterised by hardstanding and car parks.

Whilst there would be a degree of intervisibility between the proposed car park at Juhring Field and Rockwood Park this would be mitigated by the existing mature tree cover, hedgerows and boundary fences. Furthermore, surrounding the boundary of the new carpark, areas have been designated for further landscaping. This would simultaneously soften the impact of the proposed development, retaining a rural and open context, whilst providing ecological and biodiversity enhancements.

The development of the new car park would not impinge upon the setting of Rockwood Park over and above what is experienced within its immediate setting and within its own grounds, which already comprises large areas of car parking and hardstanding, of which it has a direct relationship with.

Considering impacts on Saint Hill Manor itself, the permanent car park would be situated adjacent the existing permanent hardstanding already present on the site, effectively consolidating and limiting this spread of hardstanding towards the boundary adjacent Saint Hill Road and also at the farthest practical remove from the listed building, where little to no intervisibility with the listed building would be possible.

This is considered a suitable arrangement and is generally typical of the hardstanding and parking arrangements seen throughout the wider area, reflective of the car parking and hardstanding arrangements at the East Grinstead Rugby Club to the east, Rockwood Park to the north, East Grinstead Sports Club to the northwest and the industrial estate to the southeast.

The proposed scheme would in no way negatively alter the way in which the heritage asset is currently understood, appreciated or experienced, thus preserving the contribution the application site makes towards the significance of the asset's setting, thus resulting in an overall neutral impact.

Hobbs Field

Hobbs Field is already used for major events and features large tents and marquees on a yearly basis. At the peak usage of the site the impact will be similar to that for which it is currently used and will not impact the openness of the area over and above the current use of the site. During the off-peak periods the field will be left to grow where the grass will conceal the reinforced surface below, thus retaining and preserving the rural and open landscape which comprises the wider setting of the listed building.

Similar to that proposed on the Juhring Field site, a graded system surrounding the events space and access track are to utilise a similar geocell system which will be infilled with grass, once again retaining the character and appearance of an open field and softening the impact of the development. Once again, large areas surrounding the boundary of the application site are to be designated for re-wilding, providing ecological and biodiversity enhancements.

Regarding the impact of the new structures on the site, these are proposed to be constructed directly west of the Castle and will assimilate within the spread of built form in this location, whilst preventing any direct intervisibility between these new structures and the listed building.

Their design is contemporary and sympathetic design ethos which will assimilate well within the existing landscape character of the wider Saint Hill site. Furthermore, they will help support the function, maintenance and upkeep of the site, particularly when there is high footfall during public events.

As above the proposed scheme at Hobb's Field is not considered to negatively alter the way in which the heritage asset is currently understood, appreciated or experienced, thus preserving the contribution the application site makes towards the significance of the asset's setting, thus resulting in an overall neutral impact.

Heritage Impact

Regarding the harms identified by the Conservation Officer, the scheme would not result in *less than substantial harm* to North Lodge. This building is not a designated heritage asset itself and, as confirmed above, is not curtilage listed as part of the Grade II *Saint Hill Manor*. *Paragraph 212* and *paragraph 215* of the *NPPF* only refers to designated heritage assets. The impact on this asset should therefore be assessed against *paragraph 216* of the *NPPF* where a balanced judgement has been had. Impacts are considered to be appreciably minor and would not alter the way in which this asset is currently understood or appreciated, whilst the public benefits of the scheme are considered sufficient to mitigate this.

The Conservation Officer considers that a low level of *less than substantial harm* would result to the setting of the group of heritage assets at Saint Hill Green. As discussed above, the application site does not form part of the setting of these heritage assets and there is no direct intervisibility between the site and these buildings. It is considered that the setting of these buildings would remain fundamentally *preserved* where no harm would result.

Given the substantial erosion of Rockwood Park's own setting and how it is currently experienced within its own hard-surfaced setting, the proposed development is not considered to cause harm the setting of the non-designated heritage asset. A balanced judgement has been had according to *paragraph 216* of the *NPPF*.

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Finally, regarding impacts upon the setting of the Grade II listed *Saint Hill Manor*, the degree of harm identified by the Conservation Officer has been greatly overstated. Given the sympathetic use of materials, landscaping, design and very limited intervisibility between the application site and Saint Hill Manor, the proposed development is considered to have an overall neutral impact upon the setting of this heritage asset where no harm is considered to result.

However, if the officer is of the opinion that the development would result in a degree of harm to the setting of *Saint Hill Manor*, given the account above, this could only reasonably be assessed as a low degree of *less than substantial harm*. According to *paragraph 215* of the *NPPF*, this harm should be weighed against the public benefits of the proposal. The public benefits of the proposal are detailed in full within the planning statement prepared by DMH Stallard and are considered to be more than sufficient to outweigh a low level of *less than substantial harm*.

In light of the account given above, the construction of the new permanent and temporary car parks, alongside the new restroom blocks, event space and associated infrastructure, may therefore be viewed as according with objectives set out by the relevant regulatory framework.

Principally, this would include s.66 of the *Planning (Listed Buildings and Conservation Areas) Act 1990* where special regard has been had for the *desirability of the preserving the listed building and its setting*.

Furthermore, with respect to the *NPPF*, the *desirability of sustaining and enhancing the significance of relevant heritage assets* has been taken into account (*para. 210*), whilst *great weight has also been given to the asset's conservation (para. 212)*.

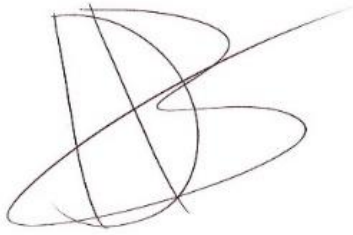
Proposals would also accord with *paragraph 135* of the *NPPF* where it states that decisions in relation to such development should be *sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change*.

In view of such an interpretation, proposals would also accord with Policy DP34 of the *Mid Sussex District Plan 2014-2031* whereby *special regard* has been given to *protecting the setting of a listed building*. Proposals further accord with Policy B10 of the *Mid Sussex Local Plan* (Adopted 2004) whereby proposals have had special regard for protecting the setting of the listed building whilst using appropriate design and materials.

The Conservation Officer should be encouraged to review the revised scheme that has been subsequently submitted to the council alongside the Heritage Impact Assessment provided by WS Heritage after this consultation was submitted.

I trust that this has been of assistance, but should you have any questions or queries, then please do not hesitate to contact me.

Yours sincerely,



Daniel Baty BA (Hons), MA, ACIfA
Heritage Consultant

WS Heritage

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MSDC Tree Officer comments dated 29.01.26 and response from PJC Consultancy

From: Irene Fletcher <Irene.Fletcher@midsussex.gov.uk>
Sent: 29 January 2026 13:54:13 UTC+00:00
To: "Martin Dale" <Martin.Dale@midsussex.gov.uk>
Subject: DM/25/2223

Hi Martin,

I note the loss of a number of Cat B trees, including two at the entrance to the site, which pose a constraint to development. This will also impact, to an extent, the character of the road.

Of most concern is the impact on the Ancient Woodland, its buffer and a TPO protected woodland. It is not completely clear from the drawing, and comparison with our own maps, that the development is outside the buffer zone. The plans are not entirely consistent.

Ancient Woodland, Ancient Trees and Veteran Trees ; Advice for making planning decisions, 14/1/22, discusses the indirect effects of development on Ancient Woodland, which do not appear to have been considered in the application. Nor does the impact of thousands of metres of plastic in the soil, and the potential for damage to the woodland floor. Potential impacts are stated below :

“ Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects
- reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species
- reducing the resilience of the woodland or trees and making them more vulnerable to change
- increasing the amount of dust, light, water, air and soil pollution
- increasing disturbance to wildlife, such as noise from additional people and traffic
- increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas
- increasing damaging activities like fly-tipping and the impact of domestic pets
- increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration
- changing the landscape character of the area

For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond

this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.

For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.

Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone."

This advice also covers other woodlands, such as TPO woodlands, to which the development is adjacent. The proposed use is a particularly disturbing, polluting, and intensive use and although stated to be a temporary car park, this would not be able to be controlled, and the structures remain in place permanently.

If the development is approved a detailed landscaping scheme is required. Reference is made to improving the buffer zone with meadow planting. This may, or may not be, appropriate, depending on species, however, clarity should be sought on the exact perimeter of the buffer zone and consideration should be given to extending this buffer zone. Government advice also states that "...reducing the amount of semi natural habitats next to AW that provide important dispersal and feeding habitat for woodland species" and makes it clear that the size and type of development has an impact on the buffer zone.

I consider that the development is contrary to Policy DP38. You may wish also to consult the Forestry Commission.

A fully detailed method statement would also be required for any incursions into RPAs.

I also have concerns over drainage which may impact on the adjacent woodlands, following the comments of the drainage consultee.

Thanks,

Irene

Irene Fletcher

Tree Officer
Development Management
Mid Sussex District Council
(Mon – Thurs)
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Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
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Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of MSDC Tree Officer

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find attached (from the arboriculturalist) and below (from the ecologist) the responses on behalf of the applicants, authored by PJC Consultancy to the comments made by Irene Fletcher, Tree Officer in her response dated 29th January 2026.

Tree Officer comments	PJC Consultancy's response
damaging functional habitat connections, such as open habitats between the trees in woodpasture and parkland	The existing track is already in use for a time each year during the set up, take down, and operational phase of the annual event. The removal of a linear section of tall grass, ruderal vegetation, and small trees, to make way for the (semi-permeable) surface, is considered to be minimal, and mitigation and compensation measures have been considered in the PEA report. Furthermore, the PEA explains that none of the criteria for

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• increasing levels of air and light pollution, noise and vibration • breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects • reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species • increasing the amount of dust, light, water, air and soil pollution	'woodpasture and parkland' are met within the area proposed for development, therefore, impacts to 'woodpasture and parkland' are not considered likely. The development will include a sensitive lighting design for both permanent and temporary lighting fixtures. Air and noise pollution is not expected to increase from current levels. The existing track is already in use for a time each year during the set up, take down, and operational phase of the event. The removal of a linear section of tall grass, ruder vegetation, and small trees, to make way for the more permanent (albeit semi-permeable) track is considered to be minimal, and all mitigation and compensation measures have been considered in the PEA report. In actual fact, the proposed development includes the planting of suitable habitat within the buffer zone between the woodland and development footprint, which is considered to ecologically improve the woodland for wildlife; including mixed scrub and wildflower grassland. The site is already used for events without the proposed infrastructure so there should not be an increase in the amount of dust or pollution. Additionally, the laying down of semi-permeable surfacing should, in theory, DECREASE the amount of mud from moving vehicles, and therefore, DECREASE the dust created once said mud is dried but continuing to have movement of vehicles over it.
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• increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas • increasing damaging activities like fly-tipping and the impact of domestic pets	Additional woodland protection could be considered in the form of post a rail fencing if woodland encroachment is considered an issue There is no history of fly-tipping at Saint Hill whatsoever as there is 24/7 on-site security. With the new scheme the Church is in fact enhancing physical security with additional gates. There are no domestic pets at Saint Hill and people do not bring their dogs to events. There are no public footpaths around the property.
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We would also ask the Tree Officer to note that the description of development for the scheme is to be amended to the following:

“Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”



Can you please reconsult the Tree Officer with these responses.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects



arboriculture . ecology . landscape

FAO Matthew Cook
Carnegie Group

12th February 2026

Response to tree officer comments on ancient woodland buffer encroachment proposed with planning application ref: DM/25/2223.

Natural England and Forestry Commission advice 14 January 2022 sets out the potential direct and indirect impacts of development on ancient woodland (AW). These are listed below along with my response as an arboriculturist:

Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:

- damaging or destroying all or part of them (including their soils, ground flora or fungi) **No trees are to be removed or pruned to facilitate construction of the track within the 15m AW buffer. The track will be a completely 'no-dig' construction and engineered to protect against compaction of the soil beneath.**
- damaging roots and understorey (all the vegetation under the taller trees) **There will be no impact on the under-storey of the AW. The track within the buffer will be a completely 'no-dig' construction and engineered to protect against compaction of the soil beneath.**
- damaging or compacting soil **The track within the AW buffer will be a completely 'no-dig' construction and engineered to protect against compaction of the soil beneath. It is understood that this is already an area where traffic crosses the AW buffer for events at the site, so the engineered permanent surface should therefore provide greater protection against compaction.**
- damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland **This is an ecological issue.**
- increasing levels of air and light pollution, noise and vibration **The route of the track is already used during events at the site, so the levels of air and light pollution will not increase.**
- changing the water table or drainage **Refer to drainage report.**
- damaging archaeological features or heritage assets **This is an archaeological issue.**
- changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss - **no tree removals are proposed within or adjacent to the AW**

Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects **This is an ecological issue.**
- reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species **This is an ecological issue.**

- reducing the resilience of the woodland or trees and making them more vulnerable to change By constructing a permanent and permeable surface on the existing track that is engineered to prevent compaction of the underlying soil in an area that is already subject to compaction by vehicle use, the resilience of the trees should improve.
- increasing the amount of dust, light, water, air and soil pollution The site is already used for events without the proposed infrastructure so there should not be an increase in the amount of dust or pollution.
- increasing disturbance to wildlife, such as noise from additional people and traffic This is an ecological issue
- increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas The site is already used for events without the proposed infrastructure. The proposal should protect against erosion from people and traffic.
- increasing damaging activities like fly-tipping and the impact of domestic pets This is an ecological issue.
- increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration The proposed encroachment into the AW buffer is already used for accessing events, therefore there should not be an increase in the frequency of access within the target area of the AW trees.
- changing the landscape character of the area This is a landscape issue

If you have any queries regarding the above, please don't hesitate to contact me.

Yours sincerely



Peter Davies
FdSc Arboriculture M.Arbor.A
Arboriculturist

**High Weald Joint Advisory Committee comments dated 09.02.26 and response from
Enplan**

High Weald Joint Advisory Committee

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High Weald
National
Landscape

www.highweald.org

Working together to care for an Area of Outstanding Natural Beauty

Mid-Sussex District Council

Emailed to Martin.Dale@midsussex.gov.uk

9th February 2026

Dear Mr Dale

DM/25/2223 Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements. Juhring And Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

Thank you for consulting us on the above application.

In summary, the High Weald National Landscape Unit objects to this proposal on the following grounds:

- The proposed development and change-of-use, comprising the introduction of a large area of car parking, comprising both permanent hardstanding and parking on grass-surfaced cell pave reinforced ground, along with associated lighting, single storey 'waiting area' structure, and permanent infrastructure to support events, would represent an urbanising intrusion into presently undeveloped countryside in the High Weald National Landscape (HWNL), having an adverse impact on the landscape character of the HWNL. Further, the introduction of the parking area, lighting and access road in close proximity to designated Ancient Woodland is considered to adversely impact on the wildlife and biodiversity of the HWNL. The proposal would therefore be contrary to objectives W2, FH2, FH3, DS2 and PQ2 of the High Weald AONB Management Plan, and would fail to conserve and enhance the natural beauty of the HWNL and would therefore be contrary to NPPF 189.
- Further, the proposal, by virtue of the scale and the extent of development proposed and the impacts on landscape character, could be considered to be 'major development' under para 190 of the NPPF, for which exceptional circumstances do not appear to exist.

It is the responsibility of the Local Planning Authority to decide whether the application meets legislative and policy requirements in respect of National Landscapes (AONBs). Section 85 of the Countryside and Rights of Way Act 2000 requires local authorities to **seek to further the purpose of conserving and enhancing the natural beauty of AONBs** in making decisions that affect the designated area.

Conserving and enhancing the natural beauty of the High Weald National Landscape will normally mean avoiding harm, and conserving and enhancing the character components identified in the AONB Management Plan; supporting the Management Plan Objectives as set out for each of these; and following any Management Plan Actions set out for each.¹²

¹ [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#)

² [CROW-s.85-duty-guidance-for-LPAs_NLA-Briefing-Nov-24.pdf](#)

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West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Tamar Valley
Wye Valley

Paragraph 189 of the NPPF requires that: “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues”.

The [High Weald AONB Management Plan 2024-2029](#) is adopted by all the relevant local authorities with land in the High Weald National Landscape as their policy for the management of the area and for the carrying out of their functions in relation to it, and is a material consideration for planning applications affecting the HWNL.

Analysis of the Proposal Against the High Weald AONB Management Plan

The Management Plan Statement of Significance defines what makes the High Weald special and identifies the qualities that justify its designation as a nationally important landscape. The High Weald’s natural beauty is described by eight key components of character around which the Management Plan is structured, including Objectives for each component.

Of particular relevance to this proposal are Management Plan Objectives:

- Woodland W2: *To protect and restore the ecological quality and functioning of woodland at a landscape scale.*
- Fieldscape & Heath FH2: *To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.*
- Fieldscape & Heath FH3: *To protect and enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.*
- Dark Skies DS1: *To preserve the dark skies of the High Weald AONB by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial and public premises in both existing and new developments within the High Weald, and from highways lighting.*
- Dark Skies DS2: *To protect wildlife and habitats from light pollution across the High Weald.*
- Aesthetic & Perceptual Qualities PQ2: *To protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity.*

The proposal seeks a change of use of land to provide hard paved surfacing for 119 carparking spaces plus reinforced ground surfacing for up to 570 car spaces, along with lighting, a car-park single storey ‘waiting area’ structure, construction of a new access and internal road, and permanent infrastructure to facilitate the erection of annual marquee structures.

Impacts on landscape character

The site comprises two presently undeveloped fields in the High Weald National Landscape (HWNL), known as Juhring field and Hobbs field. An area of woodland known as North Wood sits between the two fields of proposed development (though outside the red-line application boundary), the western section of which is designated as Ancient Woodland, an ‘irreplaceable habitat’. The remainder of North Wood is registered priority woodland under Natural England’s Priority Habitats Inventory.

The proposed formalised, hard paved surfacing for 119 car-parking spaces with associated lighting including 6 no. 6m high lighting columns, and a further 3no. 6m high lighting columns to the south, the single storey ‘waiting area’ structure of some 11m x 4m, plus reinforced ground surfacing for up to 570 car spaces, along with a new access and internal road would represent a significant change to landscape character in the HWNL from undeveloped field to areas of substantial urbanising infrastructure and activity.

Meanwhile the sheer scale of the ‘overspill’ car-parking area, though proposed as a ground reinforcement grid system with grass planting, would, once populated with 570 parked cars, have a highly urban character and would represent a significant change from the present rural character of an undeveloped field. While

the overspill parking area is referred to as 'temporary' parking in various of the application documents, we understand that the proposal as submitted is for an unfettered change of use, such that such intensive levels of formalised use as a car-park would, if the application were permitted, be able to take place unrestricted.

In total, the development would not reflect the agricultural character or the rural appearance of the HWNL, and instead would represent a discordant, urbanising intrusion into presently undeveloped countryside which contributes positively to the character and natural beauty of the HWNL, eroding the aesthetic and perceptual qualities of the site and this part of the HWNL, and would be contrary to Objective FH2, DS2 and PQ2 of the AONB Management Plan.

We also consider the proposal demonstrates inadequate consideration of the isolated area of designated woodland known as North Wood. Woodland is a key character component of natural beauty of the HWNL as set out in the AONB Management Plan. Ancient woodland is an irreplaceable habitat, and development that would result in the loss or deterioration of such a habitat should be refused, unless there are wholly exceptional reasons. Natural England provide 'standing advice' to be taken into account when making planning decisions that affect ancient woodland. This advises on the need to avoid negative effects, including indirect impacts, on ancient woodland or ancient and veteran trees. Indirect impacts can include the loss or deterioration of ancient woodland by a number of means, the following of which are considered to apply to this proposal:

- increasing the amount of dust, light, water, air and soil pollution
- increasing disturbance to wildlife, such as noise from additional people and traffic
- changing the landscape character of the area

There appears to be some discrepancy within the various submitted documents regard the provision or otherwise of a 15m buffer between the pocket of ancient woodland and the proposed development. Nevertheless, it is considered that the proposed change of use would have a number of detrimental indirect impacts on the site's Ancient and/or Priority woodland as a character component of the HWNL. This includes disturbance to the adjacent woodland from the proposed formalised and unfettered car-parking in this rural location including noise, traffic and activity, along with the proposed lighting to part of the parking area. Known effects of disturbance include reduced breeding success and population viability in a range of species. Such impacts would be contrary to Objectives W2 and FH3 of the HW AONB Management Plan. Meanwhile the proposed new hard surface road linking Juhring field to Hobbs field would leave North Wood isolated from other adjacent woodland, compounded by the proposed removal of several trees and tall vegetation along the proposed road.

Lastly, we would highlight that we disagree with the approach taken in para 6.30 of the submitted LVIA *Effects on the Core Components of Character of the National Landscapes*, which seeks to 'weigh' arguable 'positive outcomes' with negative ones. To the contrary, we can confirm that in assessing impacts of planning proposals on the High Weald National Landscape, such impacts are not subject to any 'balancing' exercise – the AONB Management Plan Statement of Significance sets out that “*Each core component of natural beauty is of equal and stand-alone importance in its own right, (i.e., they cannot be ranked) and any policy or action may be considered harmful to the AONB if it results in the loss of, or material harm to, any of these components of character.*”(p.16). Our above comments in this response set out those components of character that we consider would be harmed by the proposal.

Ecological Impacts

Furthermore, it is considered that the introduction of such development in this location would adversely affect important ecology of the HWNL by impacting protected species that currently use the habitats on site.

The site has been identified in the submitted Preliminary Ecological Appraisal (PEA) as highly suitable to support commuting and foraging bats (PEA 5.3.4) because of the location of adjacent and nearby woodland, where bats will forage along the edges of woodland. All bat species in the UK are protected fully under the Wildlife and Countryside Act 1981, as amended, and the Conservation of Habitats and Species Regulations 2010, making them European Protected Species. We are concerned about potential impacts on local bat populations from the effects of disturbance, including from the proposed lighting.

Bat roosting surveys appear to have only been conducted within the proposed development site, despite the site boundary being adjacent to ancient woodland at many points, and we consider that adjacent woodland should also have been assessed. Whilst the PEA has found that the construction and operational phases of the development are expected not to impact bat commuting and foraging routes because ‘...features are anticipated to be retained...’ (PEA 5.3.5), it is a concern that Emergence and Re-Entry Surveys were not carried out, so it is unclear the level of impact the proposed lighting would have on foraging and commuting routes. Therefore, we are concerned that the lighting proposals could impact bats if they are situated within commuting routes.

The above comments are advisory and are the professional views of the HWNL Unit’s officers on the potential impacts on the High Weald landscape. They are not necessarily the views of the HWNL Joint Advisory Committee.

Yours sincerely,

Diane Russell BSc Hons Dip Arch PgDip Arch Cons
Planning & Design Advisor, High Weald AONB Unit

Advising on an outstanding medieval landscape; connecting people, protecting beauty, restoring soils and nature.

Appendix 1: National Planning Policy for Areas of Outstanding Natural Beauty

The National Planning Policy Framework (NPPF) 2024 paragraph 189 requires **great weight** to be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation of wildlife and cultural heritage are important considerations in all these areas. **The scale and extent of development within these designated areas should be limited**, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Paragraph 190 says “When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.

Footnote 67 says: “whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”. **It is recommended that the case officer undertakes a clear and transparent assessment of whether the proposal is major development, using the key characteristics and landscape components of the National Landscape as set out in the Management Plan.**

NPPF paragraph 11 explains the presumption in favour of sustainable development. Part d says that where there are no relevant development plan policies or the relevant ones are out of date (for instance in applications involving new housing where there are housing supply or delivery deficits) then permission should be granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed⁷; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

National Landscapes are listed in footnote 7 and the most relevant policies in the Framework are paragraphs 189 and 190. A recent court of appeal case³ confirms that, if a proposal’s impact on an AONB (NL) is sufficient to provide a clear reason for refusal under NPPF 189 or 190, then the presumption in favour (or ‘tilted balance’ expressed in ii) above) should be disengaged. The decision-maker should therefore conduct a normal planning balancing exercise, applying appropriate weight to each consideration, to come to a decision. This will of course include giving great weight to the National Landscape as required by NPPF 189.

³ Monkhill Limited vs Secretary of State for Housing, Communities and Local Government and Waverley Borough Council Case No: C1/2019/1955/QBACF

Background Information about the High Weald National Landscape (AONB)



N.B. From November 22nd 2023, all AONBs are to be known as National Landscapes. The High Weald National Landscape remains designated an Area of Outstanding Natural Beauty and is referred to as such in legislation. The statutory purpose “to conserve and enhance the natural beauty of the designated landscape” remains unchanged.

The High Weald was designated in 1983 as an Area of Outstanding Natural Beauty. It is an exceptionally beautiful medieval landscape covering 564 square miles across the counties of East and West Sussex, Kent and Surrey.

The High Weald National Landscape Joint Advisory Committee is a partnership established in 1989 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory AONB Management Plan. The JAC is supported by a small, dedicated staff team, the High Weald NL Unit, which provides advice on how to conserve and enhance the NL. The advice provided by the NL Unit assists public bodies and statutory undertakers to meet their duty as set out in Section 85 of the Countryside and Rights of Way Act 2000 **to seek to further the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect it.**

The High Weald NL Unit is not a statutory body but an advisory one. It is not a local planning authority and the responsibility for determining planning applications remains with the 15 local authorities. The NL Unit is not a statutory consultee on planning matters and it remains each local planning authority's decision whether or not they seek its advice on a particular planning application.

The scope of the advice in this letter is set by the statutory High Weald [AONB Management Plan](#), which has been adopted by all partner authorities, as ‘their policy for the management of the area and for the carrying out of their functions in relation to it’.

Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of High Weald Joint Advisory Committee

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below responses on behalf of the applicant authored by PJC Consultancy and Enplan to the comments of the High Weald Joint Advisory Committee dated 9th February 2026.

Comments from PJC Consultancy

Unit's comments	PJC Consultancy's response
Furthermore, it is considered that the introduction of such development in this location would adversely affect important ecology of the HWNL by impacting protected species that currently use the habitats on-site.	This is always why a PEA is the first point of call, and was produced and issued, and available for the Planning Authority. The PEA addresses any potential direct or indirect impacts to protected species and makes recommendations for the avoidance, mitigation, or compensation of identified potential impacts.

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The site has been identified in the submitted Preliminary Ecological Appraisal (PEA) as highly suitable to support commuting and foraging bats (PEA 5.3.4) because of the location of adjacent and nearby woodland, where bats will forage along the edges of woodland. All bat species in the UK are protected fully under the Wildlife and Countryside Act 1981, as amended, and the Conservation of Habitats and Species Regulations 2010 (2017), making them European Protected Species. We are concerned about potential impacts on local bat populations from the effects of disturbance, including from the proposed lighting.	The PEA recommends a sensitive lighting strategy, and Place Services are recommending the planning condition: 'PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME'. This will be produced by a specialist lighting designer with cooperation from the project ecologist
Bat roosting surveys appear to have only been conducted within the proposed development site, despite the site boundary being adjacent to ancient woodland at many points, and we consider that adjacent woodland should also have been assessed	Any potential bat roosting features (PRFs) that may be present within the ancient woodland would be recommended avoidance and mitigation measures in the form of sensitive lighting and pollution prevention. As this mitigation is already recommended for the ancient woodland, it was not deemed an efficient use of time to undertake a full Daytime Bat Walkover survey (DBW) of all surrounding woodland parcels, which lie outside of the application red line boundary, and as such will not be subject to direct impacts from the proposed development.
Whilst the PEA has found that the construction and operational phases of the development are expected not to impact bat commuting and foraging routes because '...features are anticipated to be retained...' (PEA 5.3.5), it is a concern that Emergence and Re-Entry Surveys were not carried out so it is unclear the level of impact the proposed	Emergence surveys are recommended for developments anticipated to result in the obstruction, damage or destruction of roost sites. Emergence surveys are not proportionate or required under governmental standing advice, for foraging and commuting habitat. Surveys for anticipated significant impacts to foraging and commuting habitat for bats

lighting would have on foraging and commuting routes. Therefore, we are concerned that the lighting proposals could impact bats if they are situated within commuting routes.	would include activity surveys. However, given that the suitable foraging and commuting habitat is to be retained in full, with a suitable no works buffer zone, and that suitable lighting and pollution mitigation strategies are recommended, the level of survey effort already conducted is considered sufficient by the project ecologist. Furthermore, much of the woodland surrounding the proposed development footprint is proposed to be planted with a mix of wildflower (other neutral) grassland, mixed scrub, and native trees, thus improving the foraging and commuting habitat for bats, whilst also providing a screening buffer for the ancient woodland. This is evident in the BNG 'off-site' area assumed habitat creation. More details can be provided with a landscaping plan and planting schedule for the 'off-site' (woodland buffer) areas if necessary.
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Comments from Enplan

Unit's comments	Enplan's response
In summary, the Unit objects on the following grounds: The change of use, parking, lighting, structures and infrastructure to support events, would represent an urbanising intrusion into undeveloped countryside in the HWNL.	The existing fields are undeveloped and rural in character and the baseline position is that there is no activity. However, the temporary use and staging of the annual event have an impact on the appearance, character and quality of these fields. For much of the year the fields are 'in recovery' from the event and, when sufficiently dry in the spring, require some regrading before being left fallow for the remainder of the year. Whilst these are open areas of

• The parking area, lighting and access road close to Ancient Woodland would adversely impact on wildlife and biodiversity, contrary to objectives W2, FH2, FH3, DS2 and PQ2 of the HWNL Management Plan and contrary to NPPF paragraph 189.	countryside they are not cultivated, grazed or farmed. The change of use essentially formalises the current practice that has been undertaken consistently for many years as a temporary activity on land for up to 28 days of the year. The lighting, structures and infrastructure, including the hard surfaces, can be described as urban features. Whether it represents intrusion and what that degree of intrusion is, is a matter of detailed assessment. It is appreciated that the Unit has formed a view on this, but the LVIA concludes that the degree of harm to the local landscape character would be Slight-negligible adverse, which would represent a Moderate-minor to Minor adverse significance on a High value landscape. This limited degree of harm needs to be weighed in the planning balance. In itself this harm is not determinative in planning terms. The assertion by the Unit that there would be an adverse impact (indirectly) on wildlife and biodiversity is, with respect, a judgement made without any supporting evidence. A 15m buffer zone has been provided for the whole of North Wood including that part that is Ancient Woodland. This accords with Government guidance and is supported by the work of the project's consultant ecologists, including the positive biodiversity net gain proposals. There is one location where there would be a small incursion into the 15m buffer and within the root protection area of one tree. This section of the access road would be constructed on a
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- By virtue of scale and extent, and the impacts on landscape character, the development could be considered to be 'major development' under paragraph 190 of the NPPF for which exceptional circumstances do not appear to exist. Of particular relevance are the following objectives of the eight key components set out in the Management Plan's Statement of Significance: - Woodland W2: To protect and restore the ecological quality and functioning of woodland at a landscape scale.	no-dig basis and to the specification provided by the project's Arboricultural consultant. It does not, therefore, necessarily follow that the proposals are contrary to those Management Plan objectives related to woodland, fieldscape (FH3 only) and dark skies and contrary to paragraph 189 of the NPPF. Objectives FH2 and PQ2 are not relevant to ecological impacts. It is not agreed that the development is 'major development' for the purposes of paragraph 190 of the NPPF (see Planning Statement). However if this is not accepted the applicant's case for exceptional circumstances has been made in other submissions to which the Unit is requested to consider. In respect of the considerations of paragraph 190: (a) a strong economic case for the local economy is made and this is considered to be in the public interest, (b) evidently there is no alternative but to locate the development at Saint Hill and, therefore, in the HWNL, and (c) the detrimental effects have been carefully considered and moderated in so far as this is possible. The harms are considered to be limited on the HWNL. It is agreed that these objectives are of particular relevance but note that there is an assessment against all of the objectives set out in the submitted LVIA. The LVIA concludes as follows: Neutral No opportunities to enhance the ecological qualities and functioning of woodland at a landscape scale.
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• Fieldscape & Heath FH2: To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands. • Fieldscape & Heath FH3: To protect and enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats. • Dark Skies DS1: To preserve the dark skies of the High Weald AONB by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial and public premises in both existing and new developments within the High Weald, and from highways lighting. • Dark Skies DS2: To protect wildlife and habitats from light pollution across the High Weald. • Aesthetic & Perceptual Qualities PQ2: To protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity. Impacts on landscape character:	Neutral The field structure would be retained. Positive Indigenous tree, hedge and shrub planting plus wet meadow species mix used in the new swale feature. Slight negative There would be some inevitable increase in nighttime effects as a result of the built development. Street lighting and other sources of external lighting would be minimised. Neutral Foraging resources and commuting routes for bats at the site, such as hedgerows and trees around the perimeter, are to be retained, thus the ecological functionality of the site in a local context should remain unchanged. Slightly negative There would be some loss of intrinsic naturalness, sense of rurality and tranquillity to the local landscape context, but there would be no change to these qualities in the der context of the national Landscape. The Unit considers that the development <i>"would represent a significant change to</i>
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The proposed formalised, hard paved surfacing for 119 car-parking spaces with associated lighting including 6 no. 6m high lighting columns, and a further 3no. 6m high lighting columns to the south, the single storey 'waiting area' structure of some 11m x 4m, plus reinforced ground surfacing for up to 570 car spaces, along with a new access and internal road would represent a significant change to landscape character in the HWNL from undeveloped field to areas of substantial urbanising infrastructure and activity. • The scale of the 'overspill' car-parking area, though proposed as a ground reinforcement grid system with grass planting, would, once populated with 570 parked cars, have a highly urban character and would represent a significant change from the present rural character of an undeveloped field. The overspill parking area is referred to as 'temporary' parking in various of the application documents, we understand that the proposal as submitted is for an unfettered change of use, such that such intensive levels of formalised use as a car park would, if the application were	<i>landscape character in the HWNL from undeveloped field to areas of substantial urbanising infrastructure and activity". As set out above, the proposals simply formalise an existing temporary use that has been undertaken consistently for many years. The supporting works for this would evidently be new, but the presence of cars would not. An assessment of whether these represent a "significant change" (presumed to be major significant change) is a matter of detailed judgement. The LVIA, which has considered this in depth and has set the process and findings of the assessment in detail (and the conclusions of which are supported by the Council's landscape advisors Place Services), does not conclude that this would represent a significant change but rather that it be of <i>Moderate-minor to minor significance</i>.</i> The Unit appears to accept that the reinforced grass system proposed would not in itself have an urbanising effect but that it would be the cars, when parked, that would. As set out above, this is a temporary use that currently takes place and has continuously for many years. The change of use element of the application seeks to formalise this temporary use. Through other submissions, the applicant has indicated that it would accept a suitably worded condition that limited the car park use based on respective threshold numbers and days per year.
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permitted, be able to take place unrestricted • The development would not reflect the agricultural character or the rural appearance of the HWNL, and instead would represent a discordant, urbanising intrusion into presently undeveloped countryside which contributes positively to the character and natural beauty of the HWNL, eroding the aesthetic and perceptual qualities of the site and this part of the HWNL, and would be contrary to Objective FH2, DS2 and PQ2 of the AONB Management Plan. • We also consider the proposal demonstrates inadequate consideration of the isolated area of designated woodland known as North Wood. Ancient woodland is an irreplaceable habitat, and development that would result in the loss or deterioration of such a habitat should be refused, unless there are wholly exceptional reasons. Natural England provide 'standing advice' to be taken into account when making planning decisions that affect ancient woodland. This advises on the need to avoid negative effects, including indirect impacts, on ancient woodland or ancient and veteran trees. Indirect impacts can include the loss or deterioration of ancient woodland by a number of means, the following of which are	The difference in judgements about the landscape character effects and the judgements around the Management Plan objectives have been addressed above. The difference in judgements about the indirect effects on North Wood and the Ancient Woodland part of that have been addressed above. It is not accepted that there would be adverse direct or indirect effects on these features. There is no evidence to suggest that there would be an increase in the amount of dust, light, water, air and soil pollution. There would be no increase in the disturbance from additional people and traffic as, in practice, the use and amount of that use would not increase. The degree and significance of the change to the landscape have been assessed in the LVIA and found to be or <i>Moderate-minor</i> to <i>minor</i> significance.
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considered to apply to this proposal: ○ increasing the amount of dust, light, water, air and soil pollution ○ increasing disturbance to wildlife, such as noise from additional people and traffic ○ changing the landscape character of the area • it is considered that the proposed change of use would have a number of detrimental indirect impacts on the site's Ancient and/or Priority woodland as a character component of the HWNL. This includes disturbance to the adjacent woodland from the proposed formalised and unfettered car-parking in this rural location including noise, traffic and activity, along with the proposed lighting to part of the parking area. Known effects of disturbance include reduced breeding success and population viability in a range of species. Such impacts would be contrary to Objectives W2 and FH3 of the HW AONB Management Plan. Meanwhile the proposed new hard surface road linking Juhring field to Hobbs field would leave North Wood isolated from other adjacent woodland, compounded by the proposed removal of several trees and tall vegetation along the proposed road. • we would highlight that we disagree with the approach taken	Again, the difference in judgements about the indirect effects on North Wood and the Ancient Woodland part of that have been addressed above. It is not accepted that there would be adverse direct or indirect effects on these features. The Unit, with respect, provides and points to no specific evidence to support these assertions. The hard surface road referred to would be a reinforced gravel surface. It would be hard in character but would not be incapable of being crossed by most species. There would be the loss of several trees along the proposed access road but only one tree would be located between North Wood and other woodland. The Unit's approach to this is noted and it is understood that the Management
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in para 6.30 of the submitted LVIA Effects on the Core Components of Character of the National Landscapes, which seeks to 'weigh' arguable 'positive outcomes' with negative ones. To the contrary, we can confirm that in assessing impacts of planning proposals on the High Weald National Landscape, such impacts are not subject to any 'balancing' exercise – the AONB Management Plan Statement of Significance sets out that "Each core component of natural beauty is of equal and stand-alone importance in its own right, (i.e., they cannot be ranked) and any policy or action may be considered harmful to the AONB if it results in the loss of, or material harm to, any of these components of character."(p.16). Our above comments in this response set out those components of character that we consider would be harmed by the proposal.	Plan sets out that each core component is equal and that any action may be considered harmful to the HWNL if it results in the loss of, or material harm to, any of these components of character. In respect of loss of core components, the proposals would not lead to any such loss. The extent to which there would be 'material harm' to any of the components is a matter of judgement. The LVIA sets out that there would be some negative effects on some core components. However, it is important to consider what might be meant by 'material' in such cases. Any level of effect might be considered to be material but in the context of NPPF paragraph 190 part (c), as this contemplates the acceptability of some harms and the moderation of these (not whole mitigation), the appropriate way to interpret material is to consider this to represent a significant level of harm. The LVIA does not conclude that this would be the case in respect of any of the objectives. In terms of approach of balancing negative and positive outcomes for the objectives, exactly this approach is endorsed in Inspector's decision letter for the Highgate Hill appeal at Hawkhurst (appeal ref: APP/M22270/W/21/3282908 and attached to this note) where having looked at the effects on all objectives, Inspector Manning found on balance that the housing scheme would have a neutral effect on the objectives of the High Weald Management Plan.
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We would also ask the High Weald Joint Advisory Committee to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult the High Weald Joint Advisory Committee with this response.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc – Appeal Decision Ref: APP/M22270/W/21/3282908

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects



Appeal Decision

Inquiry held on 18, 19, 20 and 21 January 2022

Site visit made on 28 January 2022

by Jonathan Manning BSc (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 22 March 2022

Appeal Ref: APP/M2270/W/21/3282908

Land to the East of Highgate Hill and South of Copthall Avenue, Hawkhurst, Kent, TR18 4LR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Hawkhurst Estates Ltd, Leander Hawkhurst Ltd, and N and C Kennison-Cook against the decision of Tunbridge Wells Borough Council.
 - The application Ref 20/02788/FULL, dated 23 September 2020, was refused by notice dated 19 May 2021.
 - The development proposed is development of the site to provide 71 dwellings, alongside car parking, cycle parking, sustainable drainage, internal road network, public open space and associated landscaping and including the demolition of existing agricultural barn and garage and alterations to the existing access from Highgate Hill.
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Decision

1. The appeal is allowed and planning permission is granted for development of the site to provide 71 dwellings, alongside car parking, cycle parking, sustainable drainage, internal road network, public open space and associated landscaping and including the demolition of existing agricultural barn and garage and alterations to the existing access from Highgate Hill, at Land to the East of Highgate Hill and South of Copthall Avenue, Hawkhurst, TR18 4LR, in accordance with the terms of the application Ref 20/02788/FULL, dated 23 September 2020, subject to the planning conditions in the attached schedule.

Preliminary Matters

2. The Inquiry was undertaken virtually due to the Covid-19 pandemic. I undertook an unaccompanied site visit following the close of the Inquiry, in accordance with an itinerary that was discussed and agreed at the Inquiry.
3. Following the close of the Inquiry a signed and dated Section 106 agreement was provided that makes provision for: financial contributions for adult and youth recreation, biodiversity net gain, the Cranbrook community hub, health care, education, travel plan monitoring, youth services and waste management; affordable housing; highway works; and provision of a landscape and ecological management plan.

4. In each case, I am content that the obligation meets the three tests in Regulation 122 of the Community Infrastructure Levy (CIL) Regulations, which also reflect those in Paragraph 56 of the National Planning Policy Framework, 2021 (the NPPF). As a result, I have taken the S106 agreement into account and there is no need for me to consider such matters any further in my decision.

Main Issues

5. Based on the evidence provided in writing and the discussions that took place at the Inquiry, I consider the main issues for the appeal are:
 - 1) the effect of the development on the character and appearance of the surrounding area, including the High Weald Area of Outstanding Natural Beauty (AONB);
 - 2) the effect of the proposal on heritage assets;
 - 3) whether the scheme would result in harm to highway safety;
 - 4) the extent of the Council's shortfall in respect of five-year housing land supply; and
 - 5) whether exceptional circumstances exist to warrant development in the AONB and whether it is in the public interest.

Reasons

Character and appearance, including AONB

The appeal site

6. The appeal site is located on the southern edge of the main built up area of Hawkhurst and largely comprises of agricultural land. However, there are areas of woodland towards the centre of the northern boundary and within the south-eastern area of the site. It is around 6.6ha in size. The only built structures on the appeal site are the existing property known as Westfield and an agricultural storage barn that I observed is in poor condition.
7. Much of the site boundaries are defined by mature hedgerows. To the north is the existing residential dwellings within Copthall Avenue and Fieldways, with the main built-up area of Hawkhurst beyond. To the west is Highgate Hill, which is lined by mainly residential dwellings and is where vehicular access would be gained to the appeal site. There is open countryside to the east and to the south. Levels across the site generally slope downwards to the south and east where a small wooded brook dissects the valley. Public Rights of Way (PROW) run close to the southern and eastern boundaries of the site.

Context and landscape character

8. The appeal site is located within the High Wealds AONB. The NPPF sets out that great weight should be given to conserving and enhancing the

landscape and scenic beauty of the AONB, which have the highest status of protection in relation to these issues. The NPPF notes that the conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. All public bodies have a statutory duty under the Countryside and Rights of Way Act (CROW Act) 2000, Section 85, to have regard to the purpose of conserving and enhancing natural beauty in the AONB.

9. The High Wealds AONB Management Plan, 2019-2024 sets out that there are five defining components of character that have made the High Weald a recognisably distinct and homogenous area for at least the last 700 years. These are: geology, landform and water systems; dispersed historic settlement including high densities of isolated farmsteads and late Medieval villages; a dense network of historic routeways; abundance of ancient woodland; and field and heath (small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing). All of these components are located within or close to the appeal site.
10. At the national level, the appeal site is located within Natural England's National Character Area (NCA) 122 High Weald, which encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. The landscape character at a county level is established by 'The Landscape Assessment of Kent, 2004', with the site falling within the 'Bodiam: Lower Rother Valley' character area. The characteristic features of this include: large scale landscape wide views; valley floodplain meets low wooded ridges; and high hedges, unmanaged shaws, some trees and scrub on valley floor.
11. The Borough Landscape Character Assessment, 2017 (the LCA) sets out the local context and the appeal site falls within the Hawkhurst Wooded Farmland LCA no. 11. The key characteristics of this LCA are: scenic rolling hills and wooded ghyll valleys; pattern of dispersed historic farmsteads and hamlets and locally distinctive buildings; ancient routeways that form a clear network of rural lanes, footpaths and tracks, lined by ditches, hedgerows or woodland; ancient woodlands, ghylls and shaws; and the relatively intact ancient landscape pattern of irregular medieval fields bounded by woodland, shaws and ghylls, closely related to the presence of historic farmsteads and the network of ancient routeways.
12. The Council has also assessed the appeal site in its 'Landscape and Visual Impact Assessment of Proposed Allocation Sites within the High Weald AONB, 2020'. It describes the landscape baseline in detail and identifies six key landscape features (small copses, stream and associated woodland, pond and ditches, intact hedgerows, mature individual trees and fields in pasture).

Assessment

Landscape and the AONB

13. The appeal site contains many features described in the High Weald AONB Management Plan and by the landscape character assessments. Whilst overall the appeal site has a largely rural feel, there are some urbanising features, namely the existing residential dwellings to the north and west of the appeal site. The site has some relationship with the wider landscape, however the strong vegetated boundaries are containing features and the appeal site is relatively enclosed. Whilst the wider area has a high sensitivity to change, the Landscape and Visual Impact Assessment of Proposed Allocation Sites within the High Weald AONB, 2020 notes that some land, including the appeal site, could have lower landscape sensitivity which could be moderate/high sensitivity. I agree with this assessment, given the urbanising features referred to above.
14. The development of 71 dwellings and associated infrastructure and hardstanding will have demonstrable adverse impacts on the landscape features set out above. The scheme would impact on the landscape pattern of fields and is contrary to the landscape strategy of the LCA that seeks to limit new large-scale development because it is rare in the area.
15. Turning to the AONB management objectives, the appellant's assessment notes that there is a range of adverse and beneficial effects. These will be examined in turn. In terms of geology, landform, water systems and climate, I agree that there would be a slight beneficial effect for objective G1 due to the introduction of a natural ditch and sustainable urban drainage systems. Further, there would be no effect on G2 and a slight adverse effect on G3 in relation to climate change.
16. In terms of settlements, the scheme would create direct new connections from Hawkhurst to the AONB and there would be a slight beneficial effect for Objective S1. Objective S2 seeks to protect the historic pattern and character of settlement. The rationale for the objective notes that this includes other relationships (including separation) between such settlements that contribute to local identity. As is discussed further below in relation to the Conservation Areas, I consider that there would be some minor impact on the physical and perceived separation of Highgate and The Moor which contributes to the historic settlement pattern of Hawkhurst. This is as a result of the presence of new built development in the gap between the two areas. Consequently, I agree with the Council that there would be adverse impact on this objective, although I consider it to be slight, due to the fact that the proposed development would not be overly visible from views between the two and the scheme would only be briefly evident

when travelling between the two areas, namely as a result of the site access.

17. In relation to Objective S3, there is no contention between the main parties that the scheme would not enhance architectural quality and I agree that there would be a slight beneficial effect in this regard.
18. For routeways there are two objectives. The restoration of the historic routeway and a continued link into the AONB would have a slight beneficial effect in relation to Objective R1. Whilst it would be urbanised as it passes through the appeal site, it nonetheless doesn't exist at the present time, hence there would be a positive effect. I consider there would be a neutral effect on Objective R2, as there would be some urbanisation, but this would be offset by on-site ecological enhancements.
19. I agree with the appellant's assessment of woodland objectives that there would be neutral effects for Objectives W1, W3 and W4. Further, there would be slight beneficial effects for Objective W2, as a result of the improved management of the on-site woodland.
20. In relation to Field and Heath, the main parties agree that there is a moderate adverse effect on Objective FH1 that relates to securing productive agricultural land and I agree with this position. The scheme would result in the loss of small-scale fields contrary to Objective FH2. However, efforts have been made to maintain the field pattern through the existing sub-divisions and hedgerow and woodland retention. Therefore, I consider there would be a slight adverse effect in this regard. There would be a slight beneficial effect on Objective FH3 through ecological enhancements on-site and a neutral effect on Objective FH4.
21. Objective LBE1 relates to land-based economy and related rural life and seeks to improve returns from, and thereby increase entry and retention in, farming, forestry, horticulture and other land management activities that conserve and enhance natural beauty. The scheme would result in the loss of agricultural land, although I accept the appellant's view that it is unlikely to have a meaningful use in this regard due to its nature and detachment from the wider agricultural land. As a result, there would be a slight adverse effect. The main parties agreed a neutral effect on Objective LBE2 and I agree with this view.
22. Turning finally to other qualities, Objectives OQ1, OQ2 and OQ3 aim to: increase opportunities for learning about and celebrating the character of the High Weald; increase the contribution of individuals and communities to the conservation and enhancement of the AONB; and develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty. The scheme would provide increased access through the re-instatement of the historic pathway and include

the meadow area that would become public land and is expected to include information boards. As a result, I consider that there would be slight beneficial effects for Objective OQ1 and OQ2 and a moderate beneficial effect for OQ3.

23. Objective OQ4 relates to the protection and promotion of the perceptual qualities that people value. The rationale sets out that this seeks to ensure that the special qualities people value, such as tranquillity, dark skies, sense of naturalness and clean air, are recognised and taken account of in AONB management. The scheme will urbanise the appeal site and reduce tranquillity and increase noise and light levels. This would be a moderate adverse effect on this objective.
24. I have found that there would be 2 moderate adverse and 3 slight adverse effects on the AONB objectives. Conversely, there would be 1 moderate and 8 slight beneficial effects. For all other objectives, the effects are neutral. Whilst the beneficial effects are notably greater in number than the adverse effects, I consider the objectives where adverse effects would occur are clearly very important to the natural and scenic beauty of the AONB. Consequently, on balance, I am of the view that the scheme would have a neutral effect on the objectives in the AONB management plan.
25. It is clear to me that the appellant has gone to great lengths to try and moderate harm. This is evident from the amount of discussion that has taken place for this scheme and also the previously proposed scheme on a smaller part of the site. This has resulted in a scheme that the main parties agree is a well thought out landscape-led design rationale that provides a clear relationship between built development, retained features and new open spaces and landscape features that respect the site context and condition. It was also agreed that the design concept applied responds positively to the High Weald Colour Guide with the proposed materials palette being appropriate to the locality and each individual building style, and the boundary treatments being well-considered and appropriate to their interfaces.
26. The appeal scheme focuses built development to the north-western part of the appeal site and retains a large area of open space to the east (and partly to the south) as a wildflower meadow, creating a significant landscape buffer to the development, and an important transition to the open countryside. A lower density 'Farmstead Cluster' is promoted to the most southerly part of the proposed development, inspired by local farmstead clusters and informed by the 2008 High Weald Landscape Characterisation and Farmstead Study.
27. The design and layout of the scheme has also received praise from the High Weald AONB Unit, who despite their in-principle objection to the development of the site, recognised the positive design features the scheme contains.

28. I consider that the scheme represents good design, as encouraged by the NPPF. This along with the new landscaping proposed by the scheme, which can be secured by the S106 agreement and planning conditions, will make a substantial contribution to mitigating the harm to the character and appearance of the area and the AONB.
29. Overall, whilst there would clearly be landscape harm that would not conserve or enhance the scenic beauty of the AONB by virtue of the introduction of the large-scale residential development, this harm would be reduced notably by the quality of the design together with the landscape mitigation that can be secured. I also consider that the harm to the AONB is tempered by the relatively enclosed nature of the appeal site. I agree with the main parties that on completion of the scheme there would be a moderate adverse impact.
30. The appellant is of the view that after 15 years the impacts would be moderate neutral. Whereas the Council considers moderate adverse harm would remain. In my view, the harm will further reduce once the new planting establishes and the dwelling materials weather. However, the presence of 71 dwellings will still cause residual adverse harm that I consider would be moderate to low in the long term.
31. This also broadly correlates with the level of harm identified in the LVIA¹ that supports the emerging Local Plan, when development is aligned with its recommendations, which I consider is the case for the appeal scheme.
32. Hawkhurst Parish Council (HPC) are concerned about the impact on the character and appearance of the area from the proposed parking bays on Highgate Hill. Whilst noting Highgate Hill is a historic routeway, the Designers Response to Stage 1 Road Safety Audit, dated March 2021 at Appendix A shows the likely positioning of the bays. This shows that the parking bays would only cover a short section of the road opposite the appeal site. I consider that the minor loss of green verge and potential loss of trees would have a very minor effect on the character and appearance of Highgate Hill.
33. The impact of the scheme on the character of rural lanes in the area, through increased rat running has also raised concern. As set out later in the decision, a mitigation scheme is proposed at the Hawkhurst crossroads, which I consider will likely result in the scheme having only a negligible effect on congestion. Consequently, I am of the view that the scheme would not result in a significant level of increased rat running of rural lanes that would affect their character and appearance.

Visual effects

34. The LVIA that supported the application includes 12 viewpoints (representing eight different receptor groups) that were assessed for

¹ CD.4.20

effects from the proposed development, with these views typically being of medium, medium-high or of high sensitivity to the type of change proposed.

35. I consider the appeal site is relatively well contained from public viewpoints and where there are views, they are in close proximity to the site. I observed that clear views of the appeal site are gained from a section of PROW to the south of the appeal site (Viewpoint 1) that runs through the designated green space called Little Switzerland. The replacement of largely open land with residential dwellings will be experienced at close quarters, which will have an adverse effect. The LVIA sets this out as being substantial during construction and reducing to moderate on completion and after 15 years. Whilst I am of the view that the effects would be greater on completion than suggested by the appellant, I nonetheless agree that after 15 years the effect would be moderate. This is on the basis that additional planting would have matured and softened the effects of the scheme on views from the PROW in this location.
36. In terms of viewpoints 2, 3 and 4 these are also along the PROW to the south, south-east and east of the appeal site and also fall within Little Switzerland. The visualisations provided by Mr Williams in support of his proof of evidence, illustrate that due to the significant woodland, even in winter conditions, there would not be a visual effect from these viewpoints.
37. Viewpoints 5 and 6 are views from Copthall Avenue and Fieldways respectively. Dealing firstly with Copthall Avenue, some views would be gained between dwellings over the appeal site and there would be some private views from the gardens and upper floors of the existing dwellings themselves. The appellant is of the view that there would be moderate adverse effects during construction, slight adverse on completion and no effect after 15 years. Whilst I am of the view that the topography of the site, existing vegetation and the proposed planting would go a large way to mitigating adverse effects around this location, it is inevitable that some views between dwellings and from the dwellings themselves would remain. On this basis, I consider a slight adverse effect would remain after 15 years.
38. Turning to, Fieldways this provides clear views over the eastern part of the appeal site. Construction activity would be particularly noticeable, and I agree that there would be a substantial adverse effect during this period. Views from this area would be principally over the proposed meadow area, which would not contain built development, but more oblique views of the new dwellings and associated hardstanding would still be experienced. Consequently, there would be moderate adverse effects on completion of the scheme. After 15 years the additional planting would have matured, and I accept that the meadow feature would bring some enhancement. However, considerable built

development would still be evident and overall, I consider that a slight adverse effect would remain long-term.

39. In terms of views from the PROW to the west (Viewpoints 7 and 8), The Moor (Viewpoint 9) and Four Throws to the east (Viewpoint 10), I agree with the findings of the LVIA that there would be no effect on these, as the appeal site is not largely visible.
40. Finally, in relation to Viewpoints 11 and 12, which are along Highgate Hill, the development would be noticeable as a result of the proposed new access. However, once construction works are complete, I consider the access would not appear out of place and would be similar to other existing accesses off of Highgate Hill. Consequently, there would be negligible long-term effects.
41. On a related matter, there are no views of the appeal scheme from viewpoints identified as being valued in the Hawkhurst Neighbourhood Plan.
42. Overall, I consider the level of visual impact to be relatively low, with one moderate and two slight adverse effects. Nonetheless, this does equate to harm that I have taken into account in reaching my overall conclusions.

Conclusion

43. Overall and for the reasons set out above, I conclude that the scheme would cause a moderate level of adverse harm on completion, reducing to a moderate to low level in the long term, to the character and appearance of the area and to the landscape and scenic beauty of the AONB.
44. The scheme is therefore contrary to Policy EN25 of the Tunbridge Wells Borough Local Plan 2006 (the LP), Core Policies 4 and 14 of the Core Strategy 2010 (the CS), Policy LP2 of the Hawkhurst Neighbourhood Plan (the NP) and the NPPF.
45. As set out below, the Council cannot demonstrate a five-year housing land supply and therefore, in accordance with Paragraph 11 of the NPPF, the most important policies for determining the application are out-of-date. Despite this, I consider that Policy EN25 of the LP, Core Policy 4 of the CS and Policy LP2 of the NP are consistent with the NPPF and therefore, I afford them significant weight. Core Policy 14 of the CS seeks to restrict development outside of settlement boundaries and as a result of the Council not being able to demonstrate a five-year housing land supply, I afford the conflict with the policy very limited weight.

Heritage assets

46. There are several heritage assets within proximity to the appeal site. These include: two Grade II listed properties Rose Cottage and

Cockshott Farmhouse; the Grade II listed Church of All Saints located in the centre of Hawkhurst; and two Conservation Areas, Highgate Hill and The Moor, which the appeal site forms part of their settings.

Rose Cottage and Cockshott Farmhouse

47. It is common ground between the main parties that there would be less than substantial harm at the lower end of the scale to both of these heritage assets. This would be as a result of the erosion of their rural setting and the demolition of the open-sided barn and its replacement with a number of dwellings, permanently altering the setting to both buildings. Based on my own observations at the site visit, I agree with these conclusions.
48. Particular concern has been raised that the impact of construction works and increased traffic close to the buildings could affect their structural integrity, causing significant harm to the heritage assets. The appellant has provided a remote visual inspection of the exterior of both buildings and their surrounding grounds, undertaken by a Conservation Accredited Structural Engineer. This concluded that no notable degradation of either building was apparent. Whilst I am mindful that the inspection did not include the interior of the buildings and therefore any defects cannot be categorically ruled out, I have not been provided with any structural surveys to suggest that there are any significant defects associated with either building.
49. In terms of vehicles using the new access road, this would be a considerable distance away from the buildings at around 25 metres. Given the research provided by the appellant in the remote visual inspection and the absence of any other substantive evidence to the contrary, I consider that the proposed new access road would not have any adverse effects on the structural integrity of either building. Further, the appellant has set out that Highgate Hill is located approximately 18 metres to the west of the properties, which is closer than the proposed new access into the appeal site. The proposed new access would see far less traffic movements than Highgate Hill. Vibrations from Highgate Hill are therefore, in my view, far more likely to have the potential to impact on the buildings than the appeal scheme.
50. A planning condition can be imposed that would ensure any vibrations associated with construction works are monitored at these properties and any subsequent action taken if necessary.
51. Given all of the above and with the imposition of the identified planning condition, I consider that there would not be any more than less than substantial harm to these buildings, which would be at the lower end of the scale.

Church of All Saints

52. The church is an important landmark in Hawkhurst. The heritage assessment that supported the planning application sets out that the site forms a small part of the extended setting of the church and permits limited views of the spire, set beyond a foreground of residential development. Further, it notes that as a remnant of the wider rural surrounds and by virtue of permitting these views, the site is considered to make a limited contribution to the overall significance of the Church of All Saints. I agree with this conclusion.
53. Notwithstanding this, the appeal site does make, although limited, a contribution to the extended setting of the church and its domestication would not preserve this. This would result in less than substantial harm. Given the distance from the appeal site to the church, only limited views would be affected and that there is existing residential development between the appeal site and the church, I consider that the harm would be at the very lowest end of the scale.

Conservation areas

54. The Hawkhurst High Street and All Saints Conservation Area lies to the north of the appeal site, with The Moor Conservation Area lying to the south. The appeal site therefore falls within the gap between the boundaries of the two. I agree with the Council that the site carries a role as one of the pieces of open land contributing towards the rural setting of the village, which forms part of the significance of both Conservation Areas.
55. The erosion of this open land and the gap between the two areas would not preserve the settings of either Conservation Area. This would result in less than substantial harm.
56. However, it must be borne in mind that the proposed development would not be overly visible from views between the two and the scheme would only be briefly evident when travelling between the two areas, namely as a result of the site access. I have found above that the minor loss of green verge and potential loss of trees would have a very minor effect on the character and appearance of Highgate Hill. Overall, I consider that the harm would also be at the very lowest end of the scale.

Public benefits and conclusion

57. The scheme would cause less than substantial harm to five heritage assets, all of which would be on the very lowest or low side of the sliding scale. I afford considerable importance and weight to such harm. The NPPF (Paragraph 202) sets out that 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.

58. The parties agree that the public benefits of the scheme outweigh the identified harm. The public benefits of the scheme are discussed in more detail later in this decision. However, I agree with the main parties that they, most namely helping to meet the housing shortfall, outweigh the identified harm to heritage assets. The scheme therefore complies with Paragraph 202 of the NPPF.

Highways

59. When determining the planning application, the Council were of the view that the scheme would have a significant adverse effect on the capacity and congestion of the crossroads in the centre of Hawkhurst and the wider transport network. Since the application was refused, the appellant has undertaken further work and dialogue with the highway authority, Kent County Council (KCC). This has resulted in the appellant proposing a scheme of mitigation at the crossroads. A Statement of Common Ground has been signed by KCC that concludes following assessment work by them, the impacts of the proposed development are negligible on the improved junction layout. The proposed mitigation scheme also takes into account the proposed development at Turnden.
60. Following this, the Council has not defended its reason for refusal in this regard. There is clearly, however, a significant level of concern from HPC and local residents in relation to this matter.
61. During the roundtable discussion at the Inquiry, the appellant agreed to produce a note (Inquiry Document 9 (ID9)) containing additional modelling information in relation to the 'as existing' operation of Hawkhurst crossroads, to allow for a comparison with the proposed mitigation strategy to be made. This shows that the impacts on the crossroads from the proposed development alongside the Turnden development, should it come forward. It can be seen when comparing the '2021 Base, as existing' and the '2021 Base + Turnden Development + Highgate Hill Development (this scheme)' that the impacts on the crossroads would be negligible following the proposed scheme of mitigation.
62. Interested parties were allowed the opportunity to comment on the additional note (ID9) and HPC raised a number of concerns. ID9 sets out that the modelling information, incorporating the proposed mitigation scheme that was initially provided to the appellants by KCC and reported within Table 2.1 of the Proof of Evidence of Mr Jones, did not include an assessment of the baseline situation. Therefore, to provide an indication of the benefits of the mitigation scheme, against the existing arrangement of the junction, the most up-to-date traffic flows from KCC were used in ID9.
63. HPC has noted that it is not clear where the most up-to-date traffic flows have originated from and is of the view that the baseline assessment set out in Table 1 of ID9 differs materially, not just from

the figures in the appellant's own Transport Assessment (TA) that accompanied the proposal at the application stage, but also to TAs submitted in support on other recent major housing developments within the village and wider locality. In replying to the comments of HPC the appellant has confirmed that the baseline traffic flows come from June 2021 and the model outputs were provided by KCC, who, as local highway authority, considered them to be a valid representation of traffic flows on the local network at the current time.

64. I acknowledge that the Covid-19 pandemic is likely to have had an effect on traffic flows in June 2021, which could well explain the lower traffic flows recorded in the June 2021 surveys. However, there is no evidence before me to suggest that traffic has now returned to pre-pandemic levels or that it will in the future, particularly bearing in mind changes in home working practices.
65. In addition, the appellant has set out in its response to HPC's comments on ID9 that the purpose of the assessment was to demonstrate the relative benefit to be gained from the proposed mitigation scheme and that this allows for the relative difference between directly comparable 'baseline' and 'with mitigation' modelling results to be identified. The appellant is also of the view that should an alternative set of traffic survey information be used as the basis for the 'baseline' and 'with mitigation' the queuing and degree of saturation results would change, however it would be expected that the relative impact of introducing the mitigation would remain the same.
66. HPC further queried this matter in another representation (Document Submitted after the Inquiry No. 11) and in response the appellant has provided further modelling based upon the 2018 survey data from the Hawkhurst Golf Course planning application. This also shows that the impacts of the scheme would be negligible on the crossroads with the mitigation scheme in place, even at higher baseline traffic flows.
67. Other aspects of the mitigation scheme have also been challenged. HPC has expressed some doubts that the Puffin/MOVA scheme as part of the proposed mitigation would provide the extent of benefit claimed, due to the existing level of congestion and queue lengths at the junction. However, the appellant has set out that MOVA has two operational modes, congested and uncongested. MOVA monitors the rate of discharge of traffic and in the congested mode, detects any fall off in vehicle flow towards the end of the green period, which often occurs as queues discharge. When this happens the MOVA system terminates the green early so that additional capacity can be given to other arms of the junction where vehicles are waiting.
68. Further, I note that the Department for Transport's Traffic Advisory Leaflet 9/97 provides guidance on the application of MOVA technology and sets out that: 'In general, MOVA appears to give above average

benefits when applied at major, high flow junctions with speed assessment/speed detection, or at smaller heavily congested junctions’.

69. Given the above and that the crossroads, is in my view, a small heavily congested junction, I do not have any concerns in this regard. There is no evidence before me to demonstrate that the proposed works will not improve the operation of the junction during periods where queues extend beyond the detector positions. Further, the appellant’s reply to HPC concerns notes that the ‘with mitigation’ modelling assessments for the peak hours has been undertaken using fixed cycle and stage timings, and therefore do not take account of the benefits that MOVA would achieve in these periods. The modelling therefore appears to be conservative in this regard.
70. HPC has also raised concern about the assumed ‘cycle times’ in the baseline and mitigation scenarios. ID9 sets that a 120 second cycle time has been used as requested by KCC at the time, and this is also consistent with the cycle time used in the most recent KCC ‘with mitigation’ model (which was modelled as 240 seconds, reflecting two cycle times with one pedestrian stage).
71. The appellant has set out that the mitigation includes the use of Puffin Crossing Technology, which it notes includes: on-crossing detection that allows for the shortening of the pedestrian ‘all-red’ stage of the cycle time where crossings have been cleared early; and the cancelling of the pedestrian ‘all-red’ stage when a pedestrian has pressed the button, but has crossed without waiting for the ‘green man’. The appellant goes on to set out that *‘In the baseline scenario, the 120 second cycle time was used, simulating a pedestrian stage being called every cycle. To account for these capacity benefits within the ‘with mitigation’ modelling, KCC has utilised a 240 second cycle time with the pedestrian stage called once within that period and every other stage called twice. The modelling does represent an approximation of likely benefits from the mitigation proposals rather than an absolute quantification of the benefits. However, this is an approach that was proposed by KCC, who in their role as Local Highway Authority, consider it to be suitably robust for the purposes of assessing the residual impact of the development’.*
72. I accept that this does raise some uncertainty over the absolute benefits that would arise from the mitigation scheme. However, I am mindful that this approach was advocated by the highway authority, a view that I afford significant weight. Also, there has been no substantive alternative evidence put before me to demonstrate that such an approach is inappropriate or that the mitigation scheme would not deliver benefits and improvements to the crossroads. Overall, I am content that the modelling is sufficient to provide confidence that the mitigation scheme would provide improvements that would mitigate the impacts of the scheme to a negligible degree.

73. In terms of securing the proposed mitigation scheme the S106 agreement states that this must be implemented before the 51st dwelling in the scheme is occupied. However, there appears to be little basis or modelling for this figure even though it has been agreed in the SOCG by KCC. It would allow 50 dwellings to be delivered without any improvements made to the crossroads. When asked about this at the Inquiry, the appellant agreed to alter the S106 agreement to include the ability for another trigger to be set out in this decision.
74. I do not consider that there is sufficient evidence before me to demonstrate that the traffic movements associated with 50 dwellings on the appeal site could be delivered with no mitigation at the crossroads, without having a severe residual effect. Further, it is also not clear to me, how many dwellings could potentially be considered acceptable without any mitigation. On this basis, I consider that the mitigation scheme should be provided before any dwelling is occupied on the appeal site.
75. At the Inquiry the appellant confirmed that the implementation of the mitigation scheme could be viably delivered as part of this proposal even in the absence of the Turnden development. I see no reason to take a different view.
76. Drawing all of this together, it is worthy to note that the scheme is not required to address existing capacity issues on the surrounding highway network, nor does the mitigation need to achieve a betterment relative to the baseline situation. There will continue to be congestion at the crossroads as can be seen from the appellant's modelling. However, whilst there are some uncertainties about post pandemic traffic flows and the absolute benefit of the mitigation scheme, I consider that the modelling demonstrates to a sufficient degree that the residual cumulative impacts of the development on the crossroads would not be severe and there would not be any unacceptable impact to highway safety at the crossroads. This is a view shared by the highway authority. I consider the scheme therefore complies with Core Policy 3 of the CS, Policy AM1 of the NP and the NPPF.
77. On a related matter, numerous interested parties and HPC have referred to the findings of the Inspector in the Heartenoak Road appeal. However, in that case no mitigation of the crossroads was proposed and therefore it is not directly comparable to this scheme.
78. Concern has been raised about the suitability of the site access onto Highgate Hill and the introduction of the parking bays, where it is suggested the removal of on-street parked cars may increase vehicle speeds leading to safety concerns. The proposed site access arrangement, including the parking bays has been subject to a significant level of technical assessment including a Stage 1 Road Safety Audit. The Highways SOCG confirms that KCC are content with the proposed access arrangement. In addition, no substantive

evidence to the contrary has been provided. I consider that the proposed access arrangements are suitable. I also consider that the scheme makes suitable on-site parking provision.

Housing land supply

79. The parties agree that the overall housing requirement for the five-year period is 3,560 dwellings or 712 dwellings per annum (dpa). However, there is disagreement between the parties over numerous aspects of the supply. The Council's final position, based on its comments on the Hawkhurst Golf Course appeal decision² is that it has a supply of 3,378 dwellings or roughly a 4.75 year supply³, whilst the appellant is of the view that the Council has a 4.23 year supply (3,011 dwellings overall). The remaining differences between the parties are considered in turn below.

Cornford Court

80. There is disagreement between the parties as to whether the implementation of the planning permission has taken place. A Lawful Development Certificate (LDC) application⁴ relating to the implementation of the permission has been submitted to the Council. Whilst noting the evidence provided by the Council in support of its view that the permission was implemented, I consider that until the LDC application has been determined there remains sufficient doubt to consider that the site does not meet the definition of deliverable in the NPPF. Therefore, 35 dwellings should be removed from the Council's supply.

Land at Brick Kiln Farm, Cranbrook

81. The appellant accepts that this is a deliverable site, but is of the view that the Council has been overly optimistic when considering completions will start occurring in 2023/24. I understand that a house builder has submitted a new reserved matters application and is seeking to discharge various conditions. General guidance provided in the Council's Housing Supply and Trajectory Topic Paper, that supports the emerging Local Plan, sets out that national evidence base studies suggest that sites of around 100-500 dwellings take approximately 18 months from full approval to completions starting on site. The Council therefore set out in the paper that it assumes after full permission is granted, completions will start after 18 to 24 months.
82. Between now and the end of the 2023/24 period there is approximately 24 months. Whilst I understand the reserved matters application has not yet been determined, based on the 18-24 month guide, I consider there is sufficient time to determine the reserve matters application

² APP/M2270/W/21/3273022

³ Namely due to the removal of 70 dwellings from the Former Gas Works, Sandhurst Road, Royal Tunbridge Wells and 6 dwellings from Turners Pie Factory, Royal Tunbridge Wells.

⁴ 21/04097/LDCEX

and deliver 70 homes on the site by the end of the 2023/2024 period. Consequently, 180 dwellings should remain in the supply.

83. It should be noted that the Inspector of the recent Hawkhurst Golf Course appeal decision removed all 180 dwellings from the Council's supply. However, this was based on a position before a new reserved matters application for the site had been submitted to the Council.

Former Site of Springfield Nurseries, Cranbrook Road, Hawkhurst

84. The site was granted outline planning permission in November 2020. However, there is no evidence of any planning related activity in terms of reserved matters or the discharge of any planning conditions since this time. This may be explained by the fact that it formed part of the wider Hawkhurst Golf Course proposal, which was refused by appeal recently.
85. The NPPF definition of deliverable at part b) sets out that '*where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years*'.
86. The Hawkhurst Golf Course scheme was refused at appeal⁵ and the site promoters set out in June 2021 that the site can be delivered independently from the golf course scheme. However, in the absence of planning activity (such as preparation of a reserved matters application or discharge of conditions) to progress the site independently from the golf course scheme, and that I consider its future is somewhat unclear, there is not clear evidence of delivery within the next five years and it cannot therefore be considered deliverable. 24 dwellings should be removed from the Council's supply.
87. I note the Inspector of the Hawkhurst Golf Course appeal took a contrary view, but I have based my decision on the evidence placed before me at this Inquiry.

Land at Triggs Farm, Cranbrook Road, Cranbrook

88. The site received outline planning permission in January 2019 for 11 homes. A reserved matters application has now been made to the Council. The appellant has referred to land ownership and access related issues. The Council has set out that a variation of condition application to vary the access and internal road configuration was permitted on 7 October 2021⁶. Given this and the planning activity being undertaken by the site promotor, I am content that these issues have or will be suitably addressed, and that there is clear evidence of

⁵ APP/M2270/W/21/3273022

⁶ 21/02855/FULL

delivery within five years. 11 dwellings should therefore be retained in the Council's supply.

Turners Pie Factory, Royal Tunbridge Wells

89. The site is allocated as part of a wider site for around 170 homes. A planning application has been submitted for 94 dwellings at Turners Pie Factory. This shows that firm progress is being made and the site is deliverable. Further, I consider the delivery of roughly 70 dwellings in 2024/25 and 30 dwellings in 2025/26 to be realistic and in accordance with the Council's Housing Supply and Trajectory Topic Paper for small sites (0-99). 94 dwellings should therefore be included in the supply.

St Michaels, Burrswood, Groombridge, Tunbridge Wells

90. The site benefits from a Certificate of Lawful Development. However, the site still requires Listed Building Consent. The Council has provided correspondence with the site promoters agent that states that a planning application is being prepared and that this will include an application for listed building consent. Whilst there is clearly progress being made towards an application, I acknowledge the appellant's concerns that there is a risk that listed building consent may not be granted. Consequently, I am of the view that the site cannot be considered deliverable at this stage and 37 dwellings should be removed from the Council's supply.

Small sites non-implementation rate reduction

91. The NPPF is clear that sites that are not major developments (small sites) should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years. Whilst the appellant is of the view that a general lapse rate of 10% should be applied to small site permissions, it has not provided any clear evidence that any specific site will not be delivered. On this basis, no discount to the Council's supply should be made.

Windfall allowance

92. The appellant is of the view that a windfall allowance for large sites should not be applied on the basis that the Council, in support of its emerging local plan, has undertaken what it considers to be a thorough site identification exercise through its Strategic Housing and Economic Land Availability Assessment (SHELAA) to consider available land. However, I accept the Council's view that this is an assessment at a point in time. Further, the Council confirmed at the Inquiry that in considering the availability of sites, it has considered whether sites have been actively promoted and therefore likely to come forward for development. Consequently, there is likely to be changes in landownership or future plans that may result in new sites coming forward. The Council has also set out that changes to Permitted Development Rights and the Use Classes Order could also be expected

to contribute and although the extend of which is somewhat uncertain, I accept this point.

93. Historic evidence has shown that windfalls, including that for large sites, represents a reliable source of supply and given all of the above, I consider the Council's allowance is appropriate. No dwellings should therefore be removed from the Council's supply in this regard.

Conclusion

94. Drawing all of this together, I consider that a further 96 dwellings should be removed from the Council's supply. This results in an overall supply of approximately 3,282 dwellings and a housing land supply of around 4.61 years.

Other Matters

95. It is common ground between the main parties that Hawkhurst is a sustainable location for growth as it contains a variety of retail, social and community facilities, including a primary school, supermarkets, mobile bank, post office, pharmacy, petrol station, cafes, pubs, restaurants, medical practice, dental practice, churches, independent cinema, library and community centre, and an employment area in Gills Green. I agree with this view.
96. Further, I consider the appeal site is relatively well located to such facilities. The scheme also includes the provision of a new pedestrian and cycle link and measures to encourage walking, cycling and public transport use. On my site visit, I walked both the potential routes into the village centre from the appeal site. Firstly, along Highgate Hill and secondly, from the proposed new footpath and then along All Saints Road. Whilst the gradient of both routes are relatively steep, I am not of the view that this would deter people from walking either route or possibly cycling along the All Saints Road route into the village centre, given the relatively short distance involved.
97. In terms of public transport, the adequacy of the available bus services was debated at the Inquiry. I consider that the available services offer a reasonable level of provision for future residents to utilise if they wish. Further, I am mindful that this is a largely rural area and the NPPF notes that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision making. A Travel Plan can also be secured by condition, to ensure that sustainable transport modes are promoted.
98. Overall, I am content that bearing in mind the largely rural nature of the area, the scheme promotes the use of sustainable transport, as far as is reasonably possible in line with the NPPF.
99. The scheme makes provision for financial contributions in relation to adult and youth recreation, the Cranbrook community hub, health care

and education. Consequently, I am not of the view that there would be any unacceptable impacts on the local infrastructure of Hawkhurst.

100. There are some impacts associated with the removal of a small number of trees within the site. However, the vast majority of the existing trees on the appeal site would be retained and the protected pocket of woodland and oaks to its southwestern corner would be retained. I consider that the proposed new planting would suitably mitigate the loss of the existing trees to the extent that there would be no adverse impact.
101. The appeal site is located in a newly declared Air Quality Management Area (AQMA) due to exceedances in the annual mean objective of NO₂ on Cranbrook Road to the north of Hawkhurst crossroads. The appellant has undertaken an air quality assessment, which concluded that the air quality objective for NO₂ would be below the relevant air quality objectives in 2023 with and without the proposed development and that there would be a slight adverse impact at one receptor and negligible impacts at 51 receptors.
102. Whilst there is a single slight adverse impact, further mitigation is proposed in the form of the implementation of the Travel Plan to encourage sustainable travel, use of EV charging points at all properties, cycle storage provision and the use of low NO_x boilers. Further to this, conditions can be imposed that also require an air quality emissions off-setting and mitigation calculation to be submitted and the approval of a Construction and Demolition Environmental Management Plan. Given all of this, I consider that the scheme will not have any unacceptable impacts on air quality.
103. Having careful regard to the layout of the proposed scheme, I consider that there would be no unacceptable impacts on the living conditions of the occupants of existing neighbouring properties, including from overlooking, loss of sunlight or daylight and noise. There is no evidence before me to suggest that the proposed new foot/cycle path would result in antisocial behaviour.
104. There has been some suggestion that the proposal could lead to flood risk and that the stream that abuts the site regularly floods with sewage. I am content that planning conditions can be imposed to ensure that there would be no adverse impact on the water environment and to secure suitable foul and surface water drainage.
105. There is no evidence before me to suggest the provisions that have been made for waste/recycling are insufficient.
106. The scheme is not of such a scale that it would cause any prematurity issues to the emerging Local Plan. In any event, the emerging Local Plan allocates the site for development.

107. It is important to note that I have been referred to numerous other schemes and appeal decisions⁷. Whilst these are noted and I have referred to them where I have considered it particularly important to do so, there are inevitably different circumstances surrounding those cases and I have determined this scheme on its merits, as I am required to do. Unless otherwise discussed, they have not persuaded me to make any different findings.

AONB Exceptional Circumstances and Whether in the Public Interest

108. The NPPF sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in AONB which has, along with National Parks and the Broads, have the highest status of protection in relation to these issues. Further, it notes the conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and the scale and extent of development within all these designated areas should be limited.

109. The NPPF at Paragraph 177 identifies that when considering applications for development within AONB, 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. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy

110. It is well known that there is a national housing crisis. As identified above, the Council is unable to demonstrate a five-year housing land supply. As a result, there is a shortfall in the delivery of new housing over the next five years. I have found that the Council's housing land supply stands at around 4.61 years and I consider such a shortfall to not be insignificant. The Council agreed at the Inquiry that meeting housing need is in the public interest.

111. It is clear that the Council is seeking to boost the supply of market housing to meet identified needs. At the Inquiry, the Council outlined the progress of the emerging Local Plan that has been submitted for examination. However, it is clear that the borough is constrained and the Council accepted at the Inquiry that greenfield development in the

⁷ Most namely, the Turnden proposal, the Hartley appeal decision (APP/M2270/W/20/3247977) and the Old Crawley Road, Horsham appeal decision (Appeal Ref: APP/Z3825/W/21/3266503).

AONB will be needed to meet future housing needs. Indeed, the emerging Local Plan allocates the appeal site, as well as other sites in the AONB. The Council confirmed its position is that the site allocation for the appeal site is sound, despite the refusal to grant planning permission for the scheme subject to this appeal. Whilst the emerging Local Plan can only attract limited weight as it is going through the examination process and could be subject to change, it nonetheless provides an indication of the likely approach needed to meet identified housing needs in the borough. Given all of this, there is a clear need for market housing to address the current shortfall and to meet longer term needs.

112. Turning to the provision of affordable housing, the appellant has shown that there is a significant need in the borough. The most recent calculation of need is in the Council's '2021 Review of Affordable Housing Needs' at 323 dpa. The appellant has shown that the average annual delivery over the last 14 years is considerably less than this figure at some 84 dpa. In addition, the Council's note (Inquiry Document 7) confirms that the emerging Local Plan is unlikely to meet the identified affordable housing need in full.
113. The scheme would make provision for 28 affordable housing units. Core Policy 6 of the CS, although not containing a separate affordable housing target figure, sets out that development proposals delivering affordable housing should generally provide 35%. The scheme would therefore make a modest overprovision of 3 dwellings against the current development plan requirement in this regard. It is also common ground that the scheme would meet the affordable housing target in the emerging Local Plan that has been increased to 40%.
114. The Council has noted that the tenure offered by the scheme is not that which emerging policy supports and also sets out that there needs to be a focus on social rented housing, so that they will be affordable to a greater number of local people than affordable rents. However, the Council has not sought to demonstrate that there is no need for affordable rent in the borough and there is nothing in adopted local policy or national policy or guidance that justifies ranking one form of affordable housing need over another. The Government's Planning Practice Guidance is clear that all households whose needs are not being met by market housing and who are eligible for one or more of the types of affordable housing specified in the Glossary to the Framework are in affordable housing need.
115. Further, there was some discussion about the housing register and the potential for double counting and that there is no breakdown as to whether those listed are transfers and therefore already in affordable housing. Notwithstanding this, there is no evidence to suggest that there isn't a need for affordable homes in Hawkhurst or indeed the wider borough.

116. In a similar manner, it has been suggested that the housing mix for the scheme contains too many large family homes and is contrary to Policy HD2 of the NP. The policy sets out that a mix of housing types, sizes and tenures shall be provided on housing developments to support the delivery of housing that meets the local needs and demands demonstrated in the most recent housing market assessment and housing needs analysis for the Plan Area. Whilst the supporting text at Paragraph 7.23 notes that *'An adequate amount of small-sized houses should be built to allow those wishing to downsize to release larger, family-sized properties back into the market'*, I do not consider this to be an express requirement to prioritise small units over larger ones and it is unclear what an adequate amount might mean.
117. Even if the scheme does depart from the preferred housing mix of the latest Strategic Housing Market Assessment (SHMA), there is no evidence to suggest that there is no need for larger family sized dwellings across the borough. The scheme will therefore still meet an identified need. Further, Policy HD3 of the NP sets out that accessible homes suitable for the elderly and disabled, including bungalows will be encouraged. This does not, to my mind, place an express requirement for the scheme to include them.
118. The Council are of the view that the housing benefits of the scheme are 'generic' and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council's acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic.
119. I appreciate that Hawkhurst has been subject to a significant level of new housing in recent times and that this has exceeded the required delivery of 240 dwellings over the plan period of the CS (2006–2026). However, there is no suggestion that this was seen as a maximum and nonetheless, the Council cannot demonstrate a five-year housing land supply and therefore this requirement is clearly out-of-date.
120. Given all of the above, I consider that there is a clear need for the development and that the provision of both market and affordable housing carry significant weight in favour of the scheme.
121. I acknowledge that the Inspector of the Hartley appeal decision⁸ afforded moderate weight to the benefits of both market and affordable housing in the borough. However, this was in the context of a much smaller development and a smaller shortfall in housing land supply.
122. There would be some economic benefits of the scheme associated with its construction. Although, these would likely be relatively short term and it is difficult to establish the extent to which it would benefit the

⁸ CD5.3 / APP/M2270/W/20/3247977

local economy, given the scheme does not make any express commitment to local employment. There would also be benefits to the local economy from the spending of future residents of the proposed dwellings.

123. The site comprises grade 3 classified agricultural land, and therefore is considered good to moderate quality. However, I agree with the appellant that the land is separated from other areas of agricultural land, borders a woodland, and has a sloping topography. Consequently, I consider that the appeal site has limited productive potential. As a result, there is no notable existing economic activity arising from the site that would be lost should the scheme be delivered.

124. Overall, there would be positive benefits to the local economy, as a result of the scheme. Although, I consider these to be relatively modest and afford them a minor level of weight.

The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way

125. As already mentioned, the Council accepted at the Inquiry that there isn't scope for meeting all the identified housing needs without some reliance on greenfield development in the AONB, as is the position of the emerging Local Plan.

126. The Appellant has not undertaken an alternative site assessment for the purpose of this appeal either for Hawkhurst or a wider area. Notwithstanding this, the Council has undertaken a recent review of potential development sites in support of the emerging Local Plan through its SHELAA, January 2021. The Council did not seek to suggest that this piece of work was not thorough or did not include all available sites at the time.

127. The Council has noted that the emerging Local Plan makes a healthy over provision of supply against its identified housing needs and therefore should this site not come forward it would still meet its own needs. However, it is common for local plans to make an overprovision. In this case, it is to safeguard against some slippage on the large strategic sites including the proposed new settlement at Tudeley.

128. Based on the evidence before me, I consider that there is no clear scope for developing outside the designated area or meeting the Council's housing needs in some other way.

Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

129. I have found above that the scheme would result in moderate harm on completion, reducing to moderate to low harm in the long-term to the character and appearance of the area, including on the AONB, following attempts to moderate the harm through good design and landscaping.

130. The Ecological Appraisal provided in support of the planning application assessed the potential impact of the proposed development on ecology and biodiversity. I am content that there would not be any unacceptable impacts on any protected fauna or flora. In relation to biodiversity net gain, the Council has accepted that it meets current development plan policy and is therefore 'technically' adequate. Further, it accepts that there is currently no set amount required by the NPPF.
131. However, the Council has raised concerns that it does not accord with the direction of travel of the emerging Local Plan, namely Policy EN9. This is on the basis, that a 10% minimum net gain should be provided on-site. As currently drafted in the Regulation 19 version of the emerging Plan, the supporting text to Policy EN9 sets out that off-site provision would only be considered in exceptional circumstances. Although, the Council has put forward a modification to the supporting text to set out that off-site provision will be considered where it offers the best outcome for biodiversity, is in reasonably close proximity to the application site, and follows the mitigation hierarchy.
132. The appellant has set out that the scheme would realise in excess of 10% biodiversity net gain through on-site provision (areas +4.5% and linear habitats +16%) and a financial contribution (via the Section 106 Agreement) to deliver 3 habitat credits. Whilst there is some reliance on off-site provision, which is contrary to Policy EN9 as currently drafted, I am particularly mindful that the policy, its current supporting text and the proposed modification in this regard, have not yet been examined and could feasibly be subject to change. Overall, there will not be any adverse impacts in relation to biodiversity that cannot be suitably mitigated and there would be a meaningful net gain in biodiversity, in the AONB, in accordance with the current development plan and the NPPF. I consider this to be a minor benefit of the scheme.
133. The Council is of the view that the scheme will add to carbon emissions. I am mindful that the scheme makes provision for electric charging points for all dwellings, will promote sustainable transport through the provision of a travel plan and a new foot/cycle path, and lastly, it is proposed to reduce emissions by 7.3% and then off-set 10% of the site wide carbon emissions through the use of renewable energy generating technology. In my view, the scheme is seeking to reduce carbon emissions through these measures and accords with current development plan requirements and those of the NPPF.
134. I acknowledge that emerging policy would be seeking fabric first 10% reduction and 15% reduction of emissions by using renewable energy generating technology, to be calculated after the 10% fabric first. However, I am again mindful that such requirements have not yet been examined and could feasibly be subject to change. Consequently, I afford any conflict with such requirements little weight.

135. In terms of heritage, I have found above that there would be harm to five heritage assets, although this would be on the very lowest or low side of the scale in each case. The public benefits of the scheme outweigh the identified harm to heritage assets. The scheme therefore complies with Paragraph 202 of the NPPF.
136. In terms of recreational opportunities, there would not be any detrimental impacts. Conversely, the scheme would include new footpath connections, the conversion of private land to largely public land and the new meadow area. I consider that these are meaningful recreational and community benefits and enhancements that weigh in favour of the scheme.

Exceptional circumstances and in the public interest?

137. Paragraph 177 of the NPPF does not suggest that any of the three limbs contained within it should be afforded more weight than any other and therefore it is clear that a judgement must be struck having regard to them all.
138. The scheme would result in demonstrable harm to the character and appearance of the area and the AONB. However, it is clear that much consideration has been given by the appellant to the design and layout of the scheme and I am of the view that it represents 'good design' as described in the NPPF. I consider that this, along with the proposed landscaping that can be suitably secured and the relatively enclosed nature of the appeal site, would significantly moderate the impacts on the character and appearance of the area and the AONB.
139. The residual detrimental harm would be moderate on completion and moderate to low in the long term. The Council has accepted that in order to meet housing needs greenfield land in the AONB is likely to be required, indeed the appeal site is allocated in the emerging Local Plan that has been submitted for examination. The Council also accepted that as a consequence there will inevitably be some adverse impacts on the AONB in the borough, including loss of greenfields, on-site landscape resource, extension to settlement footprints and views from sensitive receptors close to the site.
140. Whilst the identified harm clearly weighs against the scheme, I am of the view that the fact that the harm has been moderated to a significant degree through good design and does not go, in my view, any or much further than what the Council accept is inevitable from the development of a greenfield site in the AONB, to be a very important consideration.
141. There would be some low level less than substantial harm to five heritage assets, but the scheme complies with the NPPF insofar that the public benefits of the scheme outweigh such harm. However, this harm does nonetheless weigh against the scheme. Further, any harm in relation to climate change would be minor.

142. In contrast, there is a substantial need for market and affordable housing, which the appeal scheme would help to meet, and this attracts significant weight in its favour. There would also be some minor economic benefits to the local economy.
143. In addition, there would be a meaningful net gain in biodiversity within the AONB and clear enhancement to recreational opportunities in the AONB through the reinstatement of the historic footpath and the conversion of private land to largely public land, namely for the new meadow area.
144. Overall and on balance, I conclude that exceptional circumstances exist and the scheme is in the public interest to meet housing needs. The scheme complies with Paragraph 177 of the NPPF. In coming to this view, I have had regard to my duties under the CROW Act, which the main parties agreed is also reflected within the considerations associated with Paragraphs 176 and 177 of the NPPF.
145. I note that Policy HD1(a) of the NP sets out a preference for small sites. However, Policy HD1(b) does allow sites for 10 or more dwellings where exceptional circumstances exist, as prescribed in the NPPF and if it can be demonstrated that its impact on the sensitive AONB landscape setting and the environmental constraints of Hawkhurst can be effectively mitigated.
146. The supporting text notes that mitigation needs to use good design in terms of an appropriate response to topography, retention of existing landscape features (where appropriate), layout and establishing good connections. Further, it also needs to *'...demonstrate a clear understanding of the immediate context. This will be particularly important when housing proposals are adjacent to existing developed areas. Mitigation at this scale needs to be in the form of carefully-designed and responsive housing layouts that respect the conditions enjoyed by existing residents, high quality landscape design towards the edges of the sites and architectural detail that draws upon local traditions and materials'*. I have found that the scheme represents good design in relation to these matters.
147. In relation to other criteria within Policy HD1(b), I consider that the scheme: represents sustainable development consistent with the NPPF, particularly given its accordance with Paragraph 177; was supported by a LVIA that included mitigation; and demonstrates effective physical integration with the existing settlement patterns found in and around Hawkhurst. Policy HD1(b) 2) iv) sets out that proposals will be required to demonstrate how they meet the objectives of the High Weald AONB Management Plan. Whilst I have found some adverse effects in relation to the objectives, there are also numerous examples of beneficial effects and I found that the overall effect would be neutral on the objectives. Having regard to the above, I consider that the proposal complies with Policy HD1(b) of the NP.

Conclusion

148. I consider that the scheme complies with the development plan, when it is considered as a whole and the NPPF advises that such development should be permitted without delay.
149. Even if I am wrong in this regard, the Council cannot demonstrate a five-year housing land supply and therefore the policies which are most important for determining the application are out-of-date. Due to the scheme's compliance with Paragraphs 177 and 202 of the NPPF, the appeal site's location in the AONB and its impact on heritage assets do not provide clear reasons for refusing the proposal.
150. Therefore, the second limb of Paragraph 11 d) applies and the adverse impacts of the scheme do not significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
151. Consequently, for all of the reasons given above and having regard to all other matters raised, I conclude that the appeal succeeds.

Planning Conditions

152. As a result of allowing the appeal, there is a need to consider what planning conditions are necessary. I have considered the suggested conditions against the tests set out within the NPPF and the advice provided by the Government's Planning Practice Guidance and have amended them where required. As well as the standard time limit condition (1), a condition is necessary to ensure the development is undertaken in accordance with the approved plans to secure certainty (2).
153. Conditions (3), (4), (5) and (6) are needed to ensure the suitable appearance of the scheme. To ensure the suitable protection of trees and hedgerows, conditions (7), (8), (9) and (10) are imposed.
154. In the interests of highway safety and the promotion of sustainable transport, conditions (11), (12), (13), (14) and (15) are required. To safeguard the living conditions of neighbouring residents, condition (16) is necessary. To ensure that the development is sustainable, conditions (17), (18) and (19) are imposed.
155. To protect against flood risk and in the interests of the water environment, conditions (20), (21), (22) and (23) are required. To ensure that there is no potential risk associated with contaminated land, condition (24) is necessary.
156. In the interests of ecology, conditions (25), (26) and (27) are imposed. Condition (28) is necessary to ensure the proposal is acceptable in terms of air quality and condition (29) is imposed in the interests of the historic environment.

157. A number of the above imposed conditions relate to pre-commencement activities. In each case, I am satisfied that the condition is necessary to make the development acceptable in planning terms. Further, the Appellant has provided written confirmation that they accept the pre-commencement conditions.

Jonathan Manning

INSPECTOR

SCHEDULE OF PLANNING CONDITIONS

Timescale

- 1) The development hereby permitted shall be begun before the expiration of 3 years from the date of this decision.

Plans

- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
 - DE284A_001A Location Plan
 - DE284A_002B Existing Site Plan
 - DE284A_003D Proposed Site Layout Plan
 - DE284A_004D Tenure Plan
 - DE284A_005D Refuse Strategy
 - DE284A_006D Boundary Treatment Plan
 - DE284A_007D Car Parking Strategy
 - DE284A_105B Street Scenes 01-02
 - DE284A_106B Street Scenes 03-06
 - DE284A_107B Street Scenes 07-11
 - DE284A_108B Street Scenes 12-17
 - DE284A_109C Street Scenes 18-19 (as submitted to the Inspector)
 - DE284A_L_501E Landscape Masterplan
 - DE284A_L_502E Landscape Plan (Plan 1 of 2)
 - DE284A_L_503E Landscape Plan (Plan 2 of 2)
 - DE284A_L_504B Landscape Sections
 - DE284A_L_505C Illustrative Landscape Masterplan
 - 04609-TR-0001-P7 Preliminary Site Access Design (as submitted 19th February 2021)
 - LN36_801.01 Rev P1 Proposed Drainage Layout

Plans and elevations as follows:

- LN36_100.01 Rev P1 Plots 25-27 and 49-51
- LN36_100.02 Rev P1 Plot 01
- LN36_100.03 Rev P1 Plot 17
- LN36_100.04 Rev P1 Plot 48
- LN36_100.05 Rev P1 Plot 73
- LN36_100.06 Rev P1 Plot 54
- LN36_100.07 Rev P1 Plot 56
- LN36_100.08 Rev P1 Plot 52
- LN36_100.09 Rev P1 Plot 58

- LN36_100.10 Rev P1 Plot 28
- LN36_100.11 Rev P1 Plot 29
- LN36_100.12 Rev P1 Plots 33, 53, 55, 57 and 74
- LN36_100.13 Rev P1 Plot 40
- LN36_100.14 Rev P1 Plot 31
- LN36_100.15 Rev P1 Plot 32
- LN36_100.16 Rev P1 Plot 22
- LN36_100.17 Rev P1 Plot 18
- LN36_100.18 Rev P1 Plot 21
- LN36_100.19 Rev P1 Plot 23
- LN36_100.20 Rev P1 Plot 24
- LN36_100.21 Rev P1 Plot 30
- LN36_100.22 Rev P1 Plots 19 and 20
- LN36_100.23 Rev P1 Plots 36 and 37
- LN36_100.24 Rev P1 Plots 41 and 42
- LN36_100.25 Rev P3 Plots 34, 35, 38 & 39
- LN36_100.26 Rev P1 Plot 02
- LN36_100.27 Rev P1 Plot 03
- LN36_100.28 Rev P1 Plots 04 and 05
- LN36_100.29 Rev P1 Plot 16
- LN36_100.30 Rev P2 Plots 46 and 47
- LN36_100.31 Rev P1 Plot 43
- LN36_100.32 Rev P1 Plot 44
- LN36_100.33 Rev P2 Plot 06
- LN36_100.34 Rev P1 Plot 46
- LN36_100.35 Rev P1 Plots 07-08
- LN36_100.36 Rev P1 Plots 59 and 60
- LN36_100.37 Rev P1 Plots 69 and 70
- LN36_100.38 Rev P1 Plots 61 and 62
- LN36_100.39 Rev P1 Plots 71 and 72
- LN36_100.40 Rev P1 Plots 10-15
- LN36_100.41 Rev P1 Plots 63-68
- LN36_100.42 Rev P1 Plot 09
- LN36_100.43 Rev P1 Proposed Detached Garages
- LN36_100.44 Rev P1 Detached Carports
- LN36_100.45 Rev P1 Refuse and Cycle Stores
- LN36_100.46 Rev P1 Substation

Character, Appearance and Trees

- 3) Prior to the commencement of development, written details including source/manufacture of all external materials (including bricks, tiles, cladding materials and paving materials to be used externally) shall be

submitted to and approved in writing by the Local Planning Authority and the development shall be carried out using the approved external materials.

- 4) Notwithstanding the submitted drawings and all supporting documentation, prior to the commencement of development (excluding 'Initial Enabling Works') detailed plans and information regarding the following aspects of the proposed development shall be submitted to and approved in writing by the Local Planning Authority:
- a) details relating to window glazing and joinery (including recess depths dimensions) and dormer windows and location of utility boxes and meters (which shall not be positioned on principle elevations unless previously approved in writing);
 - b) written details including source/ manufacturer, and photographic samples of bricks, tiles, cladding materials and all other materials to be used externally;
 - c) the layout, position and widths of all proposed roads, footpaths, and parking areas (including the method of delineation between the road and the footpath) and the means of connecting to the existing highway, the materials to be used for final surfacing of the roads, footpaths and parking forecourts, provision of bollards to turning head to west of plot 38 to prevent through traffic and any street furniture, including seating;
 - d) the positions, design, materials and type of boundary treatment;
 - e) the storage and screening of refuse and recycling areas;
 - f) the alignment, height and materials to be used in the construction of all walls, fences or other means of enclosure, including parking forecourt gates;
 - g) details of highway design, including kerbs, dropped kerbs, gulleys, utility trenches, bollards, signs and lighting columns (if applicable);
 - h) details showing how dedicated and continuous footway routes will be demarked; and
 - i) details of the on-site play area.

The development shall be carried out in accordance with the approved details.

- 5) Notwithstanding the submitted drawings and all supporting documentation, no development (excluding 'Initial Enabling Works') shall take place until details of existing and proposed levels have been submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved

levels and shall not be varied without details being first submitted to and approved in writing by the Local Planning Authority.

- 6) Notwithstanding the submitted drawings and all supporting documentation, prior to the first occupation of any part of the development, full details of hard and soft landscaping and a programme for carrying out the works shall be submitted to the Local Planning Authority for approval. The submitted scheme shall include details of hard landscape works, including hard surfacing materials; and details of soft landscape works, including planting plans, written specifications (including cultivation and other operations associated with the plant and grass establishment) and schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate.

The approved landscaping scheme shall be carried out fully in accordance with the approved programme. Any trees or other plants which, within a period of ten years from the completion of the development on that phase, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species unless the Local Planning Authority give prior written consent to any variation.

Trees and Hedgerows

- 7) Prior to commencement of development, a schedule of all proposed tree works for the whole of the development site shall be submitted to and approved in writing by the Local Planning Authority.

All tree works, other than that which can be shown as necessary to address an imminent hazard, shall be carried out in accordance with the approved schedule of tree works, including its timetable.

Any tree which is removed or, in the opinion of the Authority, seriously damaged, contrary to the approved schedule of tree works shall, in the same location, be replaced during the next planting season by a tree(s) of suitable species and size, as agreed in writing with the Authority. The replacement tree(s) shall be planted in accordance with BS 8545:2014 and maintained until securely rooted and able to thrive with minimal intervention.

- 8) Notwithstanding the details submitted, no development shall take place until details of tree protection in accordance with British Standard BS

5837:2012 have been submitted to and approved in writing by the Local Planning Authority. These details shall be set out in a standalone Arboricultural Method Statement (AMS) and scaleable Tree Protection Plan (TPP) or, where appropriate, a combined AMS/TPP or set of statements and plans.

The approved AMS and TPP shall be provided to the site foreman prior to commencement of development, and all contractors on site shall be made aware of the specified tree protection measures.

The AMS and TPP shall cover all trees to be retained which could be impacted by the development, and shall include specific measures to protect these trees through all phases of the development, including measures for:

- the location of site facilities and materials storage;
- demolition of existing structures/hard surfaces;
- changes in ground levels, including the location of construction spoil;
- excavation, including for drainage and other services;
- installation of new hard surfaces; and
- preparatory works for new landscaping where these may encroach into root protection areas and/or present canopy spreads.

All demolition and construction activities shall be carried out in accordance with the approved AMS and TPP.

- 9) Prior to commencement of development, a schedule of arboricultural supervision and monitoring shall be submitted to and approved in writing by the Local Planning Authority. This schedule shall include:

- the contact details of the arboriculturist to be appointed by the developer or their agents to oversee tree protection on the site;
- the frequency of visits; and
- the reporting of findings.

A pre-commencement meeting shall be arranged with the appointed arboriculturist and site foreman, and the Authority Tree Officer shall be invited to attend with reasonable notice.

All demolition and construction activities shall be carried out in accordance with the approved schedule.

- 10) All existing hedges or hedgerows shall be retained, unless shown on the approved drawings as being removed. All hedges and hedgerows on and immediately adjoining the site shall be protected from damage for the duration of works on the site. Any parts of hedges or hedgerows

removed without the Local Planning Authority's prior written permission or which die or become, in the opinion of the Local Planning Authority, seriously diseased or otherwise damaged following contractual practical completion of the approved development shall be replaced as soon as is reasonably practicable and, in any case, by not later than the end of the first available planting season, with plants of such size and species and in such positions as may be agreed in writing with the Local Planning Authority.

Highways

- 11) Prior to the commencement of the development, full details of the off-site works to the highway which include works to Highgate Hill in order to create suitable visibility splays shall be submitted to and approved in writing by the Local Planning Authority, following consultation with the highway authority. The approved works shall be implemented to highway authority standards and specification, prior to commencement of works on site.
- 12) Prior to the commencement of the development, full details of off-site works to the highway to include improvements to cycle parking along Rye Road, and the provision of a signalised crossing on Rye Road (close to the junction with All Saints Road) shall be submitted to and approved in writing by the Local Planning Authority, following consultation with the highway authority. The approved works shall be implemented to highway authority standards and specification, prior to commencement of works on site.
- 13) Prior to the commencement of the development, full details of the composition of the emergency vehicular access (including measures to prevent constant vehicle access and hard surfacing) shall be submitted to and approved in writing by the Local Planning Authority, following consultation with the highway authority. The approved works shall be implemented to highway authority standards and specification, prior to commencement of works on site.
- 14) The area shown on the approved plans as vehicle parking space, garages and turning shall be provided, surfaced and drained in accordance with details submitted to and approved in writing by the Local Planning Authority before the first occupation of the dwelling being served, and shall be retained for the use of the occupiers of, and visitors to, the development, and no permanent development, whether

or not permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order), shall be carried out on that area of land so shown or in such a position as to preclude vehicular access to this reserved parking, garaging and turning space.

- 15) No part of the development hereby approved, shall be brought into beneficial use / no residential dwelling shall be occupied until a detailed Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The measures within the approved Travel Plan shall be implemented within three months of first occupation of any building hereby permitted and thereafter retained. The Travel Plan should include the following:
- a) Setting objectives and targets.
 - b) Measures to promote and facilitate public transport use, walking and cycling.
 - c) Promotion of practices/facilities that reduce the need for travel.
 - d) Monitoring and review mechanisms.
 - e) Travel Plan co-ordinators and associated support.
 - f) Provision of travel information.
 - g) Marketing.
 - h) Timetable for the implementation of each element.

Living Conditions

- 16) No works shall take place until a site specific Construction/Demolition Environmental Management Plan has been submitted to and been approved in writing by the Local Planning Authority. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The plan shall include, but not be limited to:
- All works and ancillary operations which are audible at the site boundary or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 07:30 hours and 18:00 hours on Mondays to Fridays, 08:30 and 13:00 hours on Saturdays and at no time on Sundays and Bank Holidays. Unless in association with an emergency or with the prior written approval of the Local Planning Authority.

- Deliveries to and removal of plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above.
- Mitigation measures as defined in BS 5228, Noise and Vibration Control on Construction and Open Sites shall be used to estimate LAeq levels and minimise noise disturbance from construction works.
- Measures to minimise the production of dust on the site(s).
- Measures to minimise the noise (including vibration) generated by the construction process to include the careful selection of plant and machinery and use of noise mitigation barrier(s).
- Design and provision of site hoardings.
- Management of traffic visiting the site(s) including temporary parking or holding areas.
- Provision of off-road parking for all site operatives. Measures to prevent the transfer of mud and extraneous material onto the public highway. Measures to manage the production of waste and to maximise the re-use of materials.
- Measures to minimise the potential for pollution of groundwater and surface water. The location and design of site office(s) and storage compounds. The location of temporary vehicle access points to the site(s) during the construction works.
- The arrangements for public consultation and liaison during the construction works.
- Measures for controlling the use of site lighting whether required for safe working or for security purposes.
- Measures to suitably monitor any vibrations from construction works (both physical works and construction traffic) on Rose Cottage and Cockshott Farmhouse. Should any unacceptable levels be experienced, a scheme to mitigate any potential impacts shall be submitted to and approved in writing by the local planning authority before any works continue.

The development shall be undertaken in accordance with the approved details.

Sustainable Development

- 17) Prior to the occupation of the development, details of EV charging including 'rapid charge' points (of 22kW or faster) for each dwelling within the development with on-plot parking as well as publicly accessible charging points elsewhere within the development, shall be provided to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved

details and subsequently maintained as such. No dwelling shall be occupied until the 'rapid charge' point for that dwelling has been installed.

- 18) Prior to above ground works, details for the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mb) connections to multi point destinations and all buildings including residential, commercial and community, including its timing of implementation, shall be submitted to and approved in writing by the Local Planning Authority. The infrastructure shall be installed in accordance with the approved details and timings and maintained thereafter.
- 19) Notwithstanding the submitted Energy and Sustainability Statement, full details of the proposed sustainable energy measures within the development (including provision of PV panels and low NOx boilers) shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be installed, maintained and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to the variation.

Water Environment

- 20) Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site, including a timetable for its implementation, has been submitted to and approved in writing by the Local Planning Authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment, prepared by Dandara Ltd dated 17th July 2020, and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site. The drainage scheme shall also demonstrate (with reference to published guidance):
 - That silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
 - Appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details and timetable and maintained thereafter.

21) No building hereby permitted shall be occupied until an operation and maintenance manual for the proposed sustainable drainage scheme is submitted to (and approved in writing) by the local planning authority. The manual at a minimum shall include the following details:

- A description of the drainage system and its key components.
- A general arrangement plan with the location of drainage measures and critical features clearly marked.
- An approximate timetable for the implementation of the drainage system.
- Details of the future maintenance requirements of each drainage or SuDS component (including watercourses), and the frequency of such inspections and maintenance activities.
- Details of who will undertake inspections and maintenance activities, including the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

The drainage scheme as approved shall subsequently be maintained in accordance with these details.

22) No building (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report for the building to which it relates, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate the suitable modelled operation of the drainage system where the system constructed is different to that approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

23) The development hereby permitted shall not commence until details of the proposed means of foul water sewerage have been submitted to and approved in writing by the Local Planning Authority. The

development shall be carried out in accordance with the approved details and maintained as such thereafter. No dwelling shall be occupied until the agreed foul water drainage has been provided to that dwelling.

Contamination

24) The development hereby permitted shall not be commenced until the following components of a scheme to deal with the risks associated with contamination of the site has been submitted to and approved, in writing, by the Local Planning Authority:

1. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors; and
 - potentially unacceptable risks arising from contamination at the site.
2. A site investigation, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. A remediation method statement (RMS) based on the site investigation results and the detailed risk assessment (2). This should give full details of the remediation measures required and how they are to be undertaken, including a timetable for the implementation of any works required. The RMS should also include a verification plan to detail the data that will be collected in order to demonstrate that the works set out in the RMS are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The RMS shall be implemented in accordance with the approved details and timetable of implementation.
4. A Closure Report is submitted upon completion of the works. The closure report shall include full verification details as set out in 3. This should include details of any post remediation sampling and analysis, together with documentation certifying quantities and source/destination of any material brought onto or taken from the

site. Any material brought onto the site shall be certified clean; Any changes to these components require the express consent of the local planning authority. The scheme shall thereafter be implemented as approved.

Ecology

- 25) Notwithstanding the submitted drawings and all supporting documentation, prior to the installation of any external lighting (where applicable) full details shall be submitted to and approved in writing by the Local Planning Authority. Details shall include a lighting layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). The submitted lighting scheme shall be informed by an ecologist to limit the impact upon protected species from artificial light sources. The approved scheme shall be installed, maintained and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to the variation.
- 26) Prior to the commencement of the development hereby permitted, a scheme for the mitigation and enhancement of biodiversity on the site shall have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall include avoidance and mitigation measures during construction to protect species and habitats on site, bird and bat boxes within the development site, and in addition shall have regard to the enhancement of biodiversity generally. It shall be implemented in accordance with the approved proposals within it.
- 27) Prior to the first occupation of the dwellings hereby permitted, details of a Landscape and Environmental Management Plan (LEMP) for the site in accordance with BS42020 Biodiversity to include details of the management for the development as well as the long-term management of the open space and boundary hedging/landscaping, shall be submitted to and approved in writing by the Local Planning Authority. This shall also include education boards to ensure the legibility of the proposed new routeway through the site. The site shall be maintained in accordance with the LEMP thereafter.

Air Quality

- 28) Prior to the commencement of the development, details of an Air Quality Emissions Offsetting / Mitigation Calculation (including details for the delivery of the required measures and a timetable for

implementation), shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details and shall not be varied without details being first submitted to and approved in writing by the Local Planning Authority.

Historic Environment

- 29) No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a watching brief to be undertaken by an archaeologist approved by the Local Planning Authority so that the excavation is observed and items of interest and finds are recorded. The watching brief shall be in accordance with a written programme and specification which has previously been submitted to and approved in writing by the Local Planning Authority.

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Emmaline Lambert of Counsel Instructed by Mid Kent Legal Services

She called:

Marie Bolton	Principal Planner, Tunbridge Wells Borough Council
Debbie Slater	Conservation and Urban Design Officer, Tunbridge Wells Borough Council
Nick Ireland	Director, Icen Projects Limited
Jo Smith	Planning Lawyer, Mid Kent Legal Services (Roundtable on Planning Obligations)
Cheryl Parks	Planning, Mid Kent Legal Services (Roundtable on Planning Obligations)

FOR THE APPELLANT:

Charles Banner QC Instructed by Define

He called:

Andy Williams	Director, Define
Phillip Jones	Chairman, PJA
Thomas Copp	Director, RPS
Mark Rose	Director, Define

INTERESTED PARTIES

Clare Escombe	Chair, Hawkhurst Parish Council
Claire Tester	Planning Advisor, High Weald AONB Unit

DOCUMENTS SUBMITTED AT THE INQUIRY (ID Documents)

1. The Appellant's opening submissions.
2. The Council's opening submissions.
3. Claire Tester, High Weald AONB Unit Inquiry Statement.

4. Appellant's Landscape Architecture and Urban Design Evidence Presentation
5. Summary table of main parties' views on development plan policies and weight to be afforded.
6. Council's housing land supply note in response to Inspector queries.
7. Council's 'planning matters' note.
8. Updated housing land supply positions.
9. Appellant's Hawkhurst crossroads modelling note.
10. The Council's closing submissions.
11. The Appellant's closing submissions.

DOCUMENTS SUBMITTED AFTER THE INQUIRY

1. Council's response to request for further detail regarding Youth Services Contributions within the S106 Agreement.
2. Appellant's reply to 'Council's housing land supply note in response to Inspector's queries' (ID6).
3. Hawkhurst Parish Council reply to 'Appellant's Hawkhurst crossroads modelling note' (ID9).
4. Council's further note/rebuttal to 'Appellant's reply to Council's housing land supply note, in response to Inspector's queries'.
5. Appellant's response to 'Hawkhurst Parish Council reply to 'Appellant's Hawkhurst crossroads modelling note'.
6. Appeal Decision: Hawkhurst Golf Club, High Street, Hawkhurst, Cranbrook TN18 4JS (APP/M2270/W/21/3273022).
7. Appellant's response to Council's further note/rebuttal on housing land supply.
8. Council's comments on Hawkhurst Golf Club appeal decision, including update on housing land supply position.
9. Appellant's comments on Hawkhurst Golf Club appeal decision.
10. Copy of signed and dated Section 106 Agreement.
11. Further comments from HPC on document 5 above.
12. Reply of the appellant to HPC further comments on document 5.

Appendix 4

**West Sussex County Council Highways Authority comments dated 02.02.26 and
Pelham Transport Consulting Response**

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Mid Sussex District Council FAO: Martin Dale
FROM:	WSSC – Highways Authority
DATE:	2 February 2026
LOCATION:	Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead West Sussex
SUBJECT:	DM/25/2223 Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, Amended Description, Plans, Documents)
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	More Information

West Sussex County Council (WSSC), in its capacity as Local Highway Authority (LHA), have been consulted on this full application with regards to access, highway safety and capacity. The application is supported by a Transport Assessment (TA), Travel Plan (TP) and associated plans.

Site Context

The application site comprises Juhring and Hobbs Field located along Saint Hill Road, East Grinstead. The TA states that these sites are currently used for events associated with the adjacent Scientology church and other community events such as the Spring Fair, Christmas Lights and Easter Egg Hunt etc. The TA continues by saying that the events are currently held on Hobbs Field and Juhring is used for overflow parking.

The development proposals are for constructing an improved permanent access and change of use of vacant land to event area with erection of permanent infrastructure and permanent infrastructure to

overflow car parking. While it is understood that the site might benefit from the permitted development allowance granted by the 28 days allowance detailed in The Town and Country Planning (General Permitted Development) (England) Order 2015 PART 4 Temporary buildings and uses Class A and B, this assumes these uses and temporary structures are compliant with the conditions and limitations of the order. The Local Planning Authority (LPA) have informed the Highway Authority that the marquee event, for example, is not compliant with these conditions and limitations.

The LPA have also advised that the marquee and associated car parking are unauthorised uses that do not benefit from planning permission. Accordingly, any traffic impact from the marquee event has no relevance to the consideration of this application and cannot form a consideration with this planning application.

Access Arrangements

The proposed scheme includes alterations to the existing bell mouth access from Saint Hill Road. Saint Hill Road is a 'C' classified road subject to 60 miles per hour speed restriction. A radar speed gun survey carried out at the access recorded 85th percentile speeds of 40 mph northbound and 38 mph southbound. In accordance with DMRB standards, the required visibility splays of 76.17m northbound and 73.18m are achievable. A Stage 1 Road Safety Audit carried out on the proposed access improvement recommended that removal of trees, hedges and vegetation from visibility splays. An inspection of collision data supplied to WSCC by Sussex Police over a period of past five years reveals there have been no recorded incidents of injury near to the existing access. While the alterations to the access appear to meet DMRB requirements in terms of design and that they also appear to follow the recommendations in the Road Safety Audit, the Highway Authority wish to see further information about number and frequency of events, plus the supporting data that goes with those before replying further on the suitability of the access arrangements shown. This also includes the southern access (please see further comments about this under 'Parking' below).

Parking

The proposed scheme includes a hard paved surfacing for 113 car parking spaces with an additional 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces. The plans submitted show that the southern access will be utilised to access the hard paved car park. No information has been provided by the applicant with regards to visibility requirements or intensification of use of this access. It is also unclear where the coach drop-off and pickup points would be, nor how such vehicles would turn within the site. And finally, no swept path analysis is carried out for cars manoeuvring the parking spaces. Please also set out what has informed the number of spaces.

Additionally, it might be that the car park could be used for outside events and activities. The travel plan makes it clear in relation to the large event that buses will be used to pick up from the station etc, but the application, as submitted, could hold several events of this scale a year and is not proposing to provide support in these cases.

The car parking proposed is not only for events held at the church, but unspecified general parking not related to any on site event, such as but not limited to the rugby club and sports club.

Given the above, the applicants should provide further details about the parking areas and how they will be managed, whom will be permitted to use them and when, what has informed car parking numbers plus details of traffic management on event days on local roads and at the access points.

Sustainability

The opportunities to access site by walking are limited because of its rural setting, with no provision of footways or street lighting. Given the proposed use of the site for a celebratory event or other community events it is considered that many journeys would be undertaken either by private car, coaches, or car sharing by friends and families. However, the applicant should still provide further supporting information setting out how sustainable access will be provided for the site and any proposed activities.

Trip Generation and Highway Impact

The TA mentions the previously held events at the proposed grounds. However, this is only an indication, and it is unclear from the report what the scale of the development might be and how frequently the events will be held should planning permission be granted as the applicants have not detailed any specific events, periods or hours of operation for these events, other than the marquee event, or for the car parking periods.

As submitted, the application appears to be seeking an open-ended permission to use the land to hold a range of unspecified events on the land and within the church of any scale for any length of time. As such, the applicant should state whether (and how) any such uses and frequency thereof, would be controlled/limited.

Should events be large and frequent resulting in large numbers of visitors arriving by private car or similar, then the wider highway network would need to be analysed to establish what and where those impacts might be. As such, the applicant should provide much more detailed analysis of this, using both TRICS data and data obtained from facilities with similar/comparable attributes and facilities, including car parking.

Conclusion

Based on the information provided so far, the Highway Authority consider that this is insufficient to fully understand the potential impact of the proposals and because of this cannot make an informed decision about them. As such, the applicant should provide the additional information as set out in the main body of this response.

A summary of the additional information required is set out below:

1. Further information about existing temporary uses and structures on-site (and use thereof) and what is currently authorised (including traffic impact).
2. Further details of southern access point – i.e. use thereof, frequency of use, visibility splays and geometric specification and suitability thereof.
3. Information behind what has informed car parking numbers and how each car parking area is to be used (and by whom) and managed.
4. Swept path analysis of all car parking areas.
5. Plans showing the parking and turning of coaches and similarly large vehicles within the site (plus swept path analysis of the same).
6. Details of traffic management on event days.
7. Further consideration of sustainable access options for the site on event days.
8. Detailed description of the type and frequency of proposed events and what control on this is offered as part of the planning application – i.e. number, type and size of events etc.

9. Detailed traffic impact analysis for the proposed uses, the subject of this planning application, on the surrounding road network.

Please re-consult.

Roopa Bilichodmath
West Sussex County Council – Planning Services



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of West Sussex County Council Highways

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find attached the response on behalf of the applicants, authored by Pelham Transport Consulting to the comments made by West Sussex County Council Highways team in its consultation response dated

Pelham Transport has prepared the enclosed Transport Assessment Addendum report to address the various comments raised in the consultation response including:

- Access arrangements (sections 2.2.2 & 2.2.3)
- Parking (sections 2.2.4 and 2.2.5)
- Sustainability (sections 2.2.6 and 2.2.7)
- Trip generation and highway impact (sections 2.2.8 and 2.2.9)
- Fire Service (sections 2.3.6 & 2.3.7)
- Various other transport matters (sections 2.3.8 to 2.3.19)

Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD

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The addendum also include the following swept path drawings:

- Drawing PTC/CA/45417/13 – Coach Swept Path Pick-up
- Drawing PTC/CA/45417/14 – Fire Tender Swept Path
- Drawing PTC/CA/45417/15 – Car Swept Path

We would also ask West Sussex County Council Highways to note that the description of development for the scheme is to be amended to the following:

“Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

Can you please reconsult the West Sussex County Council Highways team with these responses.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects



Saint Hill Events, East Grinstead

Transport Assessment Addendum

Carnegie Architects

February 2026





DOCUMENT CONTROL

Pelham Transport Consulting Ltd. has prepared this report in accordance with the instructions from Carnegie Architects. Pelham Transport Consulting Ltd. shall not be liable for the use of any information contained herein for any purpose other than the sole and specific use for which it was prepared.

Report Reference	Issue	Description	Originator	Checked	Authorised
CA/45417/12		First Draft	R Pelham 14/2/26		
CA/45417/12		Second Draft	R Pelham 22/2/26		

CONTACT:

Telephone: 07900 390535

Pelham Transport Consulting Ltd
3 Mill Hill Drive,
Shoreham-by-sea
West Sussex, BN43 5TJ

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1 Introduction

1.1 Background

- 1.1.1 Pelham Transport Consulting have been commissioned by Carnegie Architects to prepare a Transport Assessment Addendum (TAA) in response to comments on the submitted planning application for event car parking at Saint Hill, East Grinstead Planning Application Ref: DM/25/2223. A description of the planning application is as follows:

“Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 car parking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

- 1.1.2 The draft Transport Assessment was submitted to MSDC as planning authority on 2nd September 2025. The Final Transport Assessment was submitted on 2nd December 2025.
- 1.1.3 The application consultation started on 11th December 2025 and a number of consultees have asked for additional information that is required to be answered before a decision can be made on the application.
- 1.1.4 The purpose of the TAA is to provide a response to the comments made and providing the additional required information.

2 Planning Application Comments

2.1 Introduction

- 2.1.1 The planning application comments in relation to the Transport Assessment is set out in this section for each consultee. A reference is made to each comment to the location of the relevant Section of the addendum that provides a response.

2.2 West Sussex County Council Highway Authority

- 2.2.1 A response was provided by the highway authority on 2nd February 2026 as follows below.

Comment - Access Arrangements

- 2.2.2 *The proposed scheme includes alterations to the existing bell mouth access from Saint Hill Road. Saint Hill Road is a 'C' classified road subject to 60 miles per hour speed restriction. A radar speed gun survey carried out at the access recorded 85th percentile speeds of 40 mph northbound and 38 mph southbound. In accordance with DMRB standards, the required visibility splays of 76.17m northbound and 73.18m are achievable. A Stage 1 Road Safety Audit carried out on the proposed access improvement recommended that removal of trees, hedges and vegetation from visibility splays. An inspection of collision data supplied to WSCC by Sussex Police over a period of past five years reveals there have been no recorded incidents of injury near to the existing access. While the alterations to the access appear to meet DMRB requirements in terms of design and that they also appear to follow the recommendations in the Road Safety Audit, the Highway Authority wish to see further information about number and frequency of events, plus the supporting data that goes with those before replying further on the suitability of the access arrangements shown. This also includes the southern access (please see further comments about this under 'Parking' below).*

Pelham Transport Consulting Response

- 2.2.3 The number and frequency of future events have been reviewed and updated including the additional overflow from the Sports Centre and is shown on Table 2.1 below. Currently the southern access (North Gate) is used for the smaller events with the Juhring Field access used as an overflow for larger events. Coaches currently use the southern access (North Gate) to drop off and pick up. In the future scenario there is no difference except that coaches will enter using the southern access (North Gate) and turn right into the proposed Juhring Field permanent car park to drop off and pick up and leave using the Juhring Field access (as shown on the Coach Swept Path in Appendix A). On Event Days visitors will be directed to use the Juhring Field access to park and general parishioners will use the southern access (North Gate), as existing. The Design and Access Statement (DAS) has been updated to show the vehicle movement during Events. The access into the Juhring Field permanent car park from the southern access (North Gate) has been designed just for pick-up/drop-off but could be used as a safeguard if there were ever entry/exit blockages at Juhring Field, this would be traffic managed by marshals. There would be no intensification of use to the southern access (North Gate) however the photos On Figure 2.1 and 2.2 below show that there is full visibility in each direction and they vehicles can turn safely with no reported safety issues or collisions.

Host	EVENT	DATE	Days	Duration	Cars
Saint Hill	IAS Event - Day 1	One Friday in October	1	10 hrs	570
Saint Hill	Easter Egg Hunt	Easter Sunday	1	5 hrs	500
Saint Hill	Summertime Swing	One Sunday in summer	1	7 hrs	400
Saint Hill	IAS Event - Day 2	One Saturday in October	1	10 hrs	300
Saint Hill	IAS Event - Day 3	One Sunday in October	1	4 hrs	300
Saint Hill	Bonfire Night	One evening in November	1	5 hrs	300
Places Leisure	Mid Sussex Marathon	One day in May	1	8 hrs	300
Saint Hill	Spring Fair	Last Sunday in May	1	5 hrs	200
Saint Hill	Christmas Lights Switch On	One evening in November	1	3 hrs	200
EG Rugby Club	EG Rugby Club Festival	One day in March or April	1	8 hrs	200
EG Rugby Club	EG Rugby Club Festival	One day in May	1	8 hrs	200
EG Rugby Club	EG Rugby Club Sunshine Sevens (charity event)	One day in April	1	8 hrs	200
EG Sports Club	EG Sports Club Netball Tournament	One day in April	1	8 hrs	100
Saint Hill	New Year's Celebration Event	New Year's Eve	1	5 hrs	100

14 days of parking 4% of the days there will be cars on the field
 94 hours 1% of the hours in the year there will be cars on the field

Table 2.1 Revised Events Dates and Car Trips



Figure 2.1 Southern access (North Gate) looking south



Figure 2.2 Southern access (North Gate) looking north

Comment - Parking

- 2.2.4 *The proposed scheme includes a hard paved surfacing for 113 car parking spaces with an additional 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces. The plans submitted show that the southern access will be utilised to access the hard paved car park. No information has been provided by the applicant with regards to visibility requirements or intensification of use of this access. It is also unclear where the coach drop-off and pickup points would be, nor how such vehicles would turn within the site. And finally, no swept path analysis is carried out for cars manoeuvring the parking spaces. Please also set out what has informed the number of spaces. Additionally, it might be that the car park could be used for outside events and activities. The travel plan makes it clear in relation to the large event that buses will be used to pick up from the station etc, but the application, as submitted, could hold several events of this scale a year and is not proposing to provide support in these cases. The car parking proposed is not only for events held at the church, but unspecified general parking not related to any on site event, such as but not limited to the rugby club and sports club. Given the above, the applicants should provide further details about the parking areas and how they will be managed, whom will be permitted to use them and when, what has informed car parking numbers plus details of traffic management on event days on local roads and at the access points.*

Pelham Transport Consulting Response

- 2.2.5 There will be no intensification of use of the southern access as stated in Section 2.2.3 above. The coach drop off and picking point is within the permanent car park at Juhring Field and full details are provided in the Design & Access Statement (DAS) submitted with the application. A swept path movement of a coach entering, circulating and exiting the site is attached in Appendix A. All car parking areas are typical and conform to typical car parking space requirement. All Perpendicular spaces have 6m clearance and are 2.5m x 5m. All Echelon parking spaces are 45 degrees to the road, the road is one way in the direction of the echelon parking and the road is 3.6m wide for manoeuvring. Typical swept path movements of a large car accessing the spaces is shown in Appendix A. Parking requirements are shown on Table 2.1 above for each event with dates, duration and number of parking spaces. There is a total of 689 spaces to be provided at the site including hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces. The Travel Plan sets out a number of initiatives to reduce the amount of car trips to the site and includes a Park and Ride scheme that is already in place at some events to reduce car use. The regularised car parking and better access arrangements are an improvement to the existing access arrangements the using a field access. With the improved access arrangements with full compliant junction to DMRB and gated access and car parks with marked spaces and adequate turning facilities there is a reduced need to manage access but this will be monitored by volunteer staff during events on when car parking areas are full and direction of flows with temporary

signage. There is no intensification of use to the existing events and they have been no report of collisions from the present accesses to the site. On local roads the TA has reviewed the trip distribution and assignment on the network in Section 4.5 (page 32). Highway Capacity Impact in Section 4.6 (page 35) shows a maximum flow of 200 vehicles. On event days the entrances will be managed by traffic marshals. The applicant can agree to a review of signage to Saint Hill from the local area so that vehicles will approach from the B2110 Turners Hill Road to reduce impact at Imberhorne Road, this may include the addition of brown tourist signs.

Comment - Sustainability

- 2.2.6 *The opportunities to access site by walking are limited because of its rural setting, with no provision of footways or street lighting. Given the proposed use of the site for a celebratory event or other community events it is considered that many journeys would be undertaken either by private car, coaches, or car sharing by friends and families. However, the applicant should still provide further supporting information setting out how sustainable access will be provided for the site and any proposed activities.*

Pelham Transport Consulting Response

- 2.2.7 Section 2.3 (page 11) of the TA deals with Sustainable Modes. The site lies 2.5km southwest of the town centre of East Grinstead in West Sussex. There is a field gate access on Saint Hill Road used as a temporary access and there are no footways to access the site however there is footpath access and accessible by cycling. Bus stops are located nearby but at low frequency, the train station is 2.8km away as accessible by cycling, bus or taxi. Sustainable modes are promoted through the travel plan and cycling is promoted with the provision of cycle spaces on site. As there are no footways on Saint Hill Road and no street lighting it can be deemed unsafe to walk to the site from larger residential areas. There is a footway along a hedge to the Sports Centre and across to a path leading through the Rugby club and then onto Coombe Hill Road for those living in the vicinity who use the Church. The path connects to the Juhring Field access and there are footways around the car park areas leading to the buildings. During events temporary access ways will be created to Hobbs Field with the use of temporary fencing so this is separated from any vehicle access.

Comment - Trip Generation and Highway Impact

- 2.2.8 *The TA mentions the previously held events at the proposed grounds. However, this is only an indication, and it is unclear from the report what the scale of the development might be and how frequently the events will be held should planning permission be granted as the applicants have not detailed any specific events, periods or hours of operation for these events, other than the marquee event, or for the car parking periods. As submitted, the application appears to be seeking an open-ended permission to use the land to hold a range of unspecified events on the land and within the church of any scale for any length of time. As such, the applicant should state whether (and how) any such uses and frequency thereof, would be controlled/limited. Should events be large and frequent resulting in large numbers of visitors arriving by private car or similar, then the wider highway network would need to be analysed to establish what and where those impacts might be. As such, the applicant should provide much more detailed analysis of this, using both TRICS data and data obtained from facilities with similar/comparable attributes and facilities, including car parking.*

Pelham Transport Consulting Response

- 2.2.9 See Section 2.2.3 above that makes reference to event information and parking numbers for each event.

2.3 Fire Service**Comment**

- 2.3.6 *The nearest fire hydrant for the supply of water for firefighting is 480 metres away, 390-metres further than the 90-metre distance required for a commercial premises. If an alternative water supply for firefighting is to be considered it will need to conform with the details identified in Approved Document-B (AD-B) Volume 2: B5 section 16 and agreed with West Sussex Fire & Rescue Service. Evidence will also be required to show Fire Service vehicle access meets with the requirements identified in AD-B Volume 2: B5 Section 15.*

Pelham Transport Consulting Response

- 2.3.7 A fire hydrant is to be provided at the bottom of Hobbs Field that can be accessed from the existing southern access (North Gate) that is currently used by fire tenders. A fire tender can continue along the access road at the bottom of Hobbs Field and then exit via by continuing on the maintenance route around Hobbs Field to the Juhring Field access. This has a road width of 6m and bends exceed the minimum turning radius stated in AD-B Volume 2: B5 Section 15. A swept path movement is shown in Appendix A for a fire tender negotiation the tightest sections at the bottom of Hobbs Field.

Comment - Transport

- 2.3.8 *The transport statement undertaken by Pelham Transport Consultants ref CA/45417/01 states this is a draft report this needs to be the final report.*

Pelham Transport Consulting Response

- 2.3.9 The TA submitted on 11th December is the Final version.

Comment - Transport

- 2.3.10 *The report is also based on the assumption that the existing use of the site is for events and parking. This needs to be addressed as these the authorised uses is agricultural and the reports should reflect this (as already set out above).*

Pelham Transport Consulting Response

- 2.3.11 The applicants acknowledge that the lawful use of the land that is the subject of the planning application is as open fields and therefore this is the baseline against which the proposals should be assessed. That said, the fields can be used for any purpose for a period of up to 28 days in total in any calendar year without the need for planning permission under the provisions of Class B of Part 4 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) and so this must be taken into account. In addition, it is the case that there have been many events held for a number of previous years with parking on Juhring field, most particularly the annual International Association of Scientologists event held over 3 days every October that has occurred for some 20 years.

Comment - Transport

- 2.3.12 *The transport assessment submitted fails to include any text for section 5 Summary and Conclusion and no data for the appendixes.*

Pelham Transport Consulting Response

- 2.3.13 The TA submitted on 11th December 2025 is complete with Section 5.

Comment - Transport

- 2.3.14 *The transport statement in para 4.1.1 states*

“The proposal is to make the current access permanent so that this can be used safely for events. An access road will be constructed to the Juhring Field with space for 1,100 cars with 5% active and 15% passive electric car charging spaces.”

This is incorrect and the statement needs to be amended to reflect the current proposal.

Pelham Transport Consulting Response

- 2.3.15 The current version of the TA in Section 4.1.1 reads the following:

“The proposal is to provide a 698-space car park in Juhring Field providing for events on Hobbs Field. A current field access is provided on Saint Hill Road and this will be upgraded to a priority junction in accordance with current standards. An access road will lead to a permanent tarmacked car park to the right with 118 spaces. From the entrance to the permanent car park leads to 580 space overflow temporary car park constructed of porous asphalt. constructed of porous asphalt will lead to the car park. The access road from the junction past the car park entrance will continue

to Hobbs Field to enable event construction vehicles to 100 tonnes with constructed of cellpave.”

Section 4.1.1 should be read as follows:

The proposal is to provide a permanent tarmacked 113 space car park plus 6 disabled spaces and a temporary reinforced ground surfacing on the form of geocell for up to 570 car spaces in the Juhring Field. A current field access is provided on Saint Hill Road and this will be upgraded to a priority junction in accordance with current standards. An access road will lead to a permanent tarmacked car park to the left. From the entrance to the permanent car park an access leads to the temporary overflow temporary car park. The access road from the junction past the car park entrance will continue to Hobbs Field and will be constructed of heavy duty geocell to support event construction vehicles (up to 100 tonnes). Hobbs Field is only used once a year for the IAS Event.

Comment - Transport

2.3.16 The transport statement makes no reference to the suitability of the access or the public highway for the heavy equipment such as cherry pickers cranes or HGV etc. This needs to be addressed.

Pelham Transport Consulting Response

2.3.17 The access has been designed to accommodate a luxury coach of 15m in length. As this is a rigid vehicle this is the most onerous to use the access and swept path movements have been provided that a vehicle and adequately turn without creating a safety risk on the public highway. A Stage 1 Road Safety Audit has confirmed that this is acceptable Saint Hill Road has a 60 mph speed limit and a width of 8.8 metres at the access and is adequate to serve large vehicles.

Comment - Transport

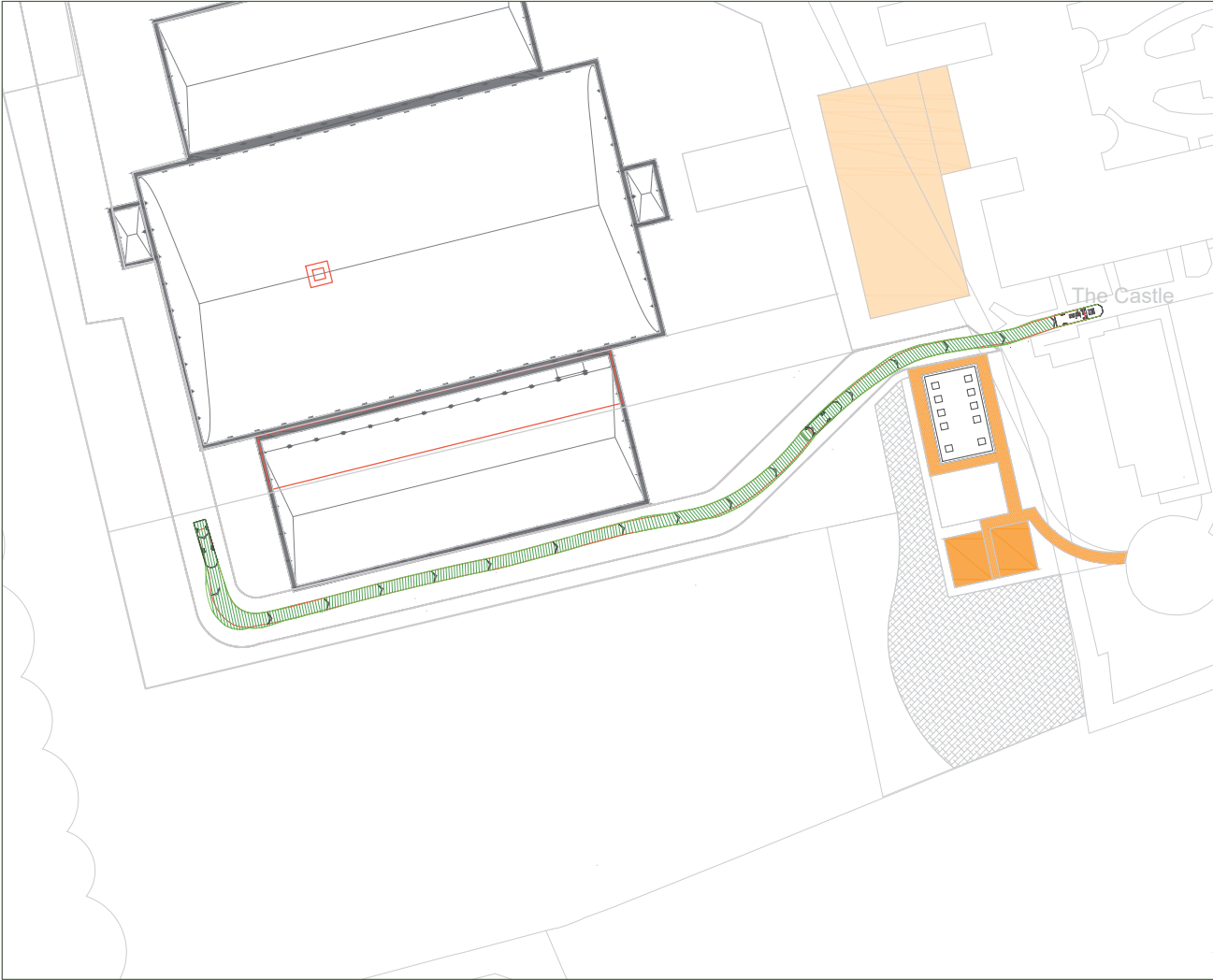
2.3.18 It is assumed these vehicles are hired for the event could this be clarified.

Pelham Transport Consulting Response

2.3.19 There are no vehicles for events kept on site and these are hired just for events.

APPENDIX A SWEPT PATH MOVEMENTS

Drawing No.
PTC/CA/45417/13





0012 Fire Appliance	
Overall Length	8.65m
Overall Width	2.45m
Overall Body Height	3.4m
Min Body Clearance	0.55m
Max 100% Width	2.4m
Lock to Lock Time	5.0/2s
Lock to Lock Turning Radius	

Client Title
Saint Hill Events

Drawing Title
Saint Hill Road
Fire Tender Swept Path

Originator RP	Approved NTS	Date 25.02.2020	Scale NTS
Drawing No. PTC/CA/45417/14	Rev.	Sheet No.	

Appendix 5

**West Sussex County Council Lead Local Flood Authority comments dated 26.09.25 and
response of QED Structures**

Planning Officer
Development Control
Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Lead Local Flood Authority

Date 26 September 2025

Dear Planning Officer,

RE: DM/25/2223 – Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road, East Grinstead, West Sussex

Thank you for your consultation on the above site. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for Hard paved car park with 121 spaces and toilet facilities adjacent to Saint Hill Road. Hard paved access road servicing both Juhring and Hobbs fields. Engineered grass surfaced provision of 619 spaces for temporary parking for specific events in Juhring field. Re-contouring of Hobbs field with grassed surface and provision of permanent pads for a marquee together with washroom facilities and substation with backup generator.

This application has been assessed using NPPF, PPG Flood Risk and Coastal Change, MSDC Local Plan and the [National standards for sustainable drainage systems \(SuDS\)](#) (Updated 30th July 2025).

We have concerns with the Flood Risk Assessment and Drainage Strategy which could result in an increase flood risk elsewhere. We **require further information** to address the following:

1. Modelling parameters must be FEH 22 with CV =1 both summer and winter
2. Calculations for a 50% AEP and 3.3% AEP plus climate change are required. In the 3.3% AEP results, there shall be no flooding of the surface water drainage system, apart from areas designed to hold or convey surface water.
3. The levels in the calculations and the drainage layout must match.

We'd encourage the applicant to use additional source control SuDS features where possible, to ensure a SuDS Approach is used. This will help ensure the SuDS system has multiple benefits, including amenity and biodiversity.

When preparing any additional documents, the applicant should provide details on how each SuDS standard has been met.

Yours sincerely,

Mat Jackson
Flood Risk Management Team
FRM@westsussex.gov.uk

Annex

The following documents were accessed from the planning portal and considered at the time in review of this application:

- Flood Risk Assessment and Surface Water Drainage Rev P02 prepared by QED Structures 28/01/25
-

Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of the Lead Local Flood Authority (LLFA)

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below the responses on behalf of the applicants, authored by QED Structures, to the comments made by Mat Jackson in the West Sussex Floor Risk Management Team in its consultation response dated 26 September 2025.

1. Model set-up: Our drainage model uses the latest FEH rainfall data and the correct settings ($C_v = 1.0$ for both summer and winter).
2. Storm events checked: We have tested the drainage for 1 in 2, 1 in 30, and 1 in 100 year storms, with and without Climate Change.
3. Key result: For the 1 in 30 years + CC storm, the model shows no flooding from the drainage system. Any water is held within the drainage storage as designed, and if anything, ever exceeds capacity it is directed safely towards the watercourse.

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Direct line 01293 663519 **Email** nigel.abbott@dmhstallard.com **Main line** 01293 605000 **Fax** 01293 246016

Offices in London, Gatwick, Guildford, Brighton, Horsham and Hassocks. Website www.dmhstallard.com

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4. Levels match drawings: The levels used in the model match the levels shown on the drainage drawings.
5. We have already included extra "source control" SuDS in the design. The scheme uses permeable surfacing, filter drains and swale, so surface water is slowed down and treated before it leaves the site. These are shown in the FRA/Drainage Strategy and on the drainage drawings.

We would also ask the LLFA to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult the Lead Local Flood Authority with these responses.

Yours faithfully

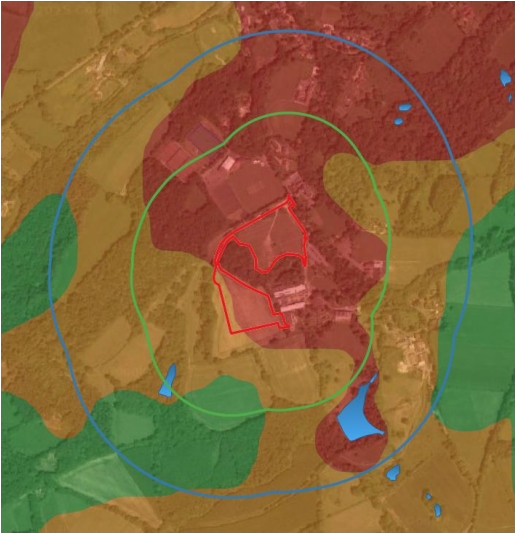
DMH Stallard LLP

DMH Stallard LLP

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

Nature Space comments dated 30.09.25 and response from PJC Consultancy

Consultee Response

Case Ref: DM/25/2223	Date: 30 September 2025
From: NatureSpace	Response: Further Information Required
This planning application is for: Hard paved car park with 121 spaces and toilet facilities adjacent to Saint Hill Road. Hard paved access road servicing both Juhring and Hobbs fields. Engineered grass surfaced provision of 619 spaces for temporary parking for specific events in Juhring field. Re-contouring of Hobbs field with grassed surface and provision of permanent pads for a marquee together with washroom facilities and substation with backup generator. Summary - The development falls within the red impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the red impact zone, there is highly suitable habitat and a high likelihood of great crested newt presence. - There are 15 ponds within 500m of the development proposal, the closest of which are located between the two fields, approximately 18m from the RLB. - There is a historical great crested newt record within 250m. - There is direct connectivity between the development and surrounding features in the landscape. - Natural England Standing Advice guidance for local planning authorities advises that surveys on ponds up to 500m from development sites should be requested.  Figure above: Outline of the site (red) in the context of the surrounding landscape, including the Impact Risk Zones for GCN. Ponds are shown in light blue, not all ponds shown on map. A 250m buffer is shown around the site in green and a 500m buffer in blue. Contains public sector information licensed under the Open Government Licence v3.0. Ecological Information The applicant has provided an ecological report, <i>Preliminary Ecological Appraisal, Juhring and Hobbs Field, Saint Hill Road, East Grinstead, West Sussex RH19 4JY, PJC, September 2024</i>. Within this report it states that:	

- *“The woodland parcels are anticipated to be retained in full as part of the proposed development. However, a small section of tall ruderal vegetation which also comprised bramble scrub and scattered trees (anticipated to be no more than 0.03ha in size) is proposed to be removed in order to facilitate access to the new development.”*
- *“Overall, four waterbodies were identified within a 250m radius of the Site as part of the desk study. These comprised five woodland ponds (waterbodies WB1-WB4).”*
- *“Direct impacts on suitable waterbodies for breeding GCN are not anticipated. However, the proposed development could result in adverse direct and indirect impacts on GCN, resulting in the death or injury, or disturbance to GCN during their terrestrial phase or result in the damage or destruction of a GCN resting place such as a hibernation site.”*
- *“Therefore, it is recommended that construction works (including habitat clearance works) be undertaken in accordance with a Precautionary Non-Licensed Method Statement”*

Conclusion and recommendations

The above report has come to the conclusion that due to only the small area of ruderal habitat which will be removed to facilitate this development, that a non-licensed method statement will be sufficient to mitigate against risk to GCN. However, we are of the opinion that should the nearby ponds return a positive result for GCN, that the scale of the works to the short grassland habitat itself would be likely to impact on the species potentially during their terrestrial phase. Additionally, the removal of optimal scrub and ruderal vegetation to the north of the site could lead to disturbance and destruction of suitable GCN sheltering habitat. Without information on the nearby ponds, the risk is not considered low enough for avoidance measures to be appropriate.

We are therefore not satisfied that the applicant has adequately demonstrated that there will no impact to great crested newts and/or their habitat as a result of the development being approved.

Therefore, in line with the guidance from Natural England ([Great crested newts: District Level Licensing for development projects, Natural England, March 2021](#)), there is a reasonable likelihood that great crested newts will be impacted by the development proposals and therefore, the applicant must either:

- Submit a NatureSpace Report or Certificate to demonstrate that the impacts of the proposed development can be addressed through Mid Sussex Council’s District Licence. This method of licensing often removes the need for survey work and onsite mitigation for great crested newts as it provides compensation habitats off site. This would provide certainty to the applicant, as their licensing route can be determined within 10 working days at any time of the year (more details can be found at www.naturespaceuk.com); or
- Provide further information (information on ponds with ecological connectivity to the site), in line with Natural England’s [Standing Advice](#), to rule out impacts to great crested newts*, or demonstrate how any impacts can be addressed through appropriate mitigation/compensation proposals**; or
- If it is determined that there is no suitable habitat impacted on site and the likelihood of great crested newts is very low, then a precautionary working statement in the form of

Reasonable Avoidance Measures (RAMs)/Non-Licensed Method Statement (NLMS) strategy documents completed by a suitably qualified ecologist may be acceptable for the development.

*i.e., to show that any ponds within 500m are not suitable for great crested newts and/or show how any potential impacts can be avoided.

*To do so, surveys to determine presence/likely absence and population size class assessments may need to be undertaken by a suitably qualified ecologist in accordance with Natural England's Standing (Great crested newts: advice for making planning decisions – GOV.UK) (and if using eDNA surveys, the Great Crested Newt Environmental eDNA Technical Advice Note (Natural England 2014)). If GCN are identified, appropriate mitigation and compensatory measures will need to be identified to satisfy planning requirements and a site-based mitigation licence may be required. Surveys are seasonally constrained.

More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com

Contact details: info@naturespaceuk.com

Relationship between NatureSpace and Mid Sussex District Council

Mid Sussex District Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England. This is administered by NatureSpace Partnership through their District Licensing Scheme as the council's delivery partner. A dedicated 'District Licensing Officer' is employed by NatureSpace to provide impartial advice to the council and help guide them and planning applicants through the process. All services and arrangements are facilitated in an unbiased, independent and transparent manner. You can find out more at www.naturespaceuk.com

Legislation, Policy and Guidance

Reasonable Likelihood of Protected Species

Permission can be refused if adequate information on protected species is not provided by an applicant, as it will be unable to assess the impacts on the species and thus meet the requirements of the National Planning Policy Framework (2023), ODPM Circular 06/2005 or the Conservation of Habitats and Species Regulations 2017 (as amended). The Council has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications. CLG 2007 'The validation of planning applications' states that applications should not be registered if there is a requirement for an assessment of the impacts of a development on biodiversity interests.

Section 99 of ODPM Circular 06/2005 states:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out

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after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted.

Great crested newts

Great crested newts and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Therefore, it is illegal to deliberately capture, injure, kill, disturb or take great crested newts or to damage or destroy breeding sites or resting places. Under the Wildlife and Countryside Act 1981 (as amended) it is illegal to intentionally or recklessly disturb any great crested newts occupying a place of shelter or protection, or to obstruct access to any place of shelter or protection (see the legislation or seek legal advice for full details). Local planning authorities have a statutory duty in exercising of all their functions to *‘have regard, so far is consistent with the proper exercise of those functions, to the purpose of conserving and enhancing biodiversity,’* as stated under section 40 of the Natural Environment and Rural Communities Act 2006 (as amended), as well as a duty under the Conservation of Habitats and Species Regulations 2017 (as amended) to have regard to the requirements of the Habitats Directive. As a result, GCN and their habitats are a material consideration in the planning process.

Lifespan of Ecological Reports and Surveys

Validity of ecological reports and surveys can become compromised overtime due to being out-of-date. CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017) states, if the age of data is between 12-18 months, *“the report authors should highlight whether they consider it likely to be necessary to update surveys”*. If the age of the data is between 18 months to 3 years an updated survey and report will be required and anything more than 3 years old *“The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated”*.



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of Nature Space

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below responses on behalf of the applicant authored by PJC Consultancy to the comments of Nature Space dated 30 September 2025.

PJC Consultancy has completed the application form for the GCN District Licence and have produced the Water Body Plan and GCN calculator, all of which are attached.

We would also ask Nature Space to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs

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consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

Can you please reconsult Nature Space with this response.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

Section 1. Development information

Developer Name/Organisation Must match applicant name on planning application. Cannot be a Planning Agent or Ecologist.	Church of Scientology Religious Education College Inc.	
Contact details of Developer Organisation representative Contact details must be for named Developer rather than the Planning Agent or Ecologist.	Name: Rob Thompson	Job title: Estates Mgr
	Phone: 07852 773042	Email: robt@cmouk.org
Planning Reference If not available please provide details of planning situation/timeline	DM/25/2223	
Invoice Address	Saint Hill, Saint Hill Road, East Grinstead, RH19 4JY	
Site Name	Juhring and Hobbs Field at Saint Hill Manor	
Site Location Address and/or 8-figure grid reference	Saint Hill, Saint Hill Road, East Grinstead, RH19 4JY	
Development Description Include general description, development type and scale, including where applicable, no of units, size of development site, proposed floor space in square metres	Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)	

Development proposal plans Attach alongside application. District Licensing requires that the whole planning red line boundary is included in the impact assessment.	Mandatory ☒ Proposed – Location Plan (red line boundary – must match planning application) Optional ☒ Proposed & existing – masterplan or other site layout plan ☒ Proposed – site drainage plan and/or drainage designs (if pond on-site or in close proximity, this will be used to assess whether ponds may be polluted by the development proposal)
When do you intend to commence site works? Optional, if known – can be a rough answer.	Late April/Early May 2026

Section 2. Ecological information

NATURESPACE RECOMMENDS THIS SECTION IS COMPLETED BY A SUITABLY QUALIFIED NEWT ECOLOGIST (IF OTHERWISE, ECOLOGIST MUST SIGN SECTION 3 TO CONFIRM)

2.1 Ecological information (expand table as required)

Consultant Ecologist:	Name: Naomi Cornwell BSc(Hons) MSc	Job title: Ecological Consultant
	Email: naomi@pjconsultancy.com	Phone: 01233225365
Please attach an ecological report and/or maps as necessary to provide the following information: Only ecological data from within the last two years can be relied upon for licensing; older data can provide context so please submit if available. Please include GIS format if available. For large schemes this may be mandatory – consult NatureSpace. Great crested newt surveys are <u>not required</u> to access District Licensing.	Mandatory – must attach in report/s or separately: ☒ Phase 1/PEA or similar habitat survey for site area ☒ Map of known waterbodies (ponds and wet ditches) within 500m of development boundary (if any waterbodies have not been included this exclusion must be evidenced - see District Licence Practitioners Guide Part 2 for more details) Optional (provide if available): ☐ Any GCN survey data obtained (including known records; include date, surveyor name and result) ☒ Any HSI data obtained for waterbodies within 500m (include date, surveyor name and full HSI factor breakdown) – Contained with PEA report ☐ If potential wet ditches within 500m – detail of whether they hold or discharge water, flow etc. (see District Licence Practitioners Guide Part 2 for more details)	

	☒ Site photographs – Within PEA report	
Previous licences or compensation sites Confirm whether any part of the development site is subject to an existing or previous Natural England GCN mitigation licence or Natural Environment and Rural Communities Act (NERC) Act Agreement. NB: if a previous licence exists, NatureSpace may charge additional administrative fees to liaise with the regulator.	None known of	
BNG Provision (optional) Have you arranged provision of compensation habitat for BNG requirements If you require NatureSpace to provide offsite units to support your BNG provision please complete Section 2.3	☒ Yes ☐ BNG Metric attached (optional)	Details: Details within BNG report attached
	☐ No	
	☐ N/A	

2.2 OPTIONAL – EXPAND & COMPLETE IF RELEVANT: Temporary impacts and avoidance of impacts

NATURESPACE RECOMMENDS THIS SECTION IS COMPLETED BY A SUITABLY QUALIFIED NEWT ECOLOGIST (IF OTHERWISE, ECOLOGIST MUST SIGN SECTION 3 TO CONFIRM)

In most cases, the District Licence would cover impacts to the whole planning red line boundary. In particular circumstances, the applicant may commit to working restrictions which mean that impacts can be avoided or temporary – these should be detailed in this section if relevant.

See the [District Licence Practitioners Guide Part 2](#) for more details.



COMPLETE IF ANY IMPACTS ARE TEMPORARY: Will the works be complete within one year, and habitat reinstated to previous/better condition?	
COMPLETE IF PONDS ARE WITHIN 50m OF PROPOSED DEVELOPMENT: Describe any potential direct or indirect impacts to waterbodies within 50m of proposed development, or how these will be avoided (e.g. with specific design/working measures on-site)	Two waterbodies were identified within 50m of the proposed development footprint. Waterbody WB1 was located adjacent to the northern boundary of Hobbs Field, within North Wood. An HSI assessment was undertaken on WB1 and found the pond to have 'Poor' suitability to support breeding GCN, considered to be predominantly due to the lack of emergent vegetation and full shade from the woodland canopy. The pond was also considered to dry out every 1-3 years (see Table 6 for results). Waterbody WB2 was located within a woodland parcels, approximately 40m north of the Site boundary and connected to the Site via grassland. Direct impacts on suitable waterbodies for breeding GCN are not anticipated. However, the proposed development could result in adverse direct and indirect impacts on GCN, resulting in the death or injury, or disturbance to GCN during their terrestrial phase or result in the damage or destruction of a GCN resting place such as a hibernation site. Given that the vast majority of the Site comprised grassland of a short sward (<10cm) which was subject to a regular mowing regime, as well as regular disturbance from the annual festival and regular car parking, the vast extent of the grassland was considered less than sub-optimal for GCN (and other amphibians). It is considered that the suitable habitat to be lost to facilitate the development comprised solely the area of tall ruderal vegetation at the location of the new access track into Hobbs Field (see PEA report Phase 1 Habitat Map). Therefore, it is recommended that construction works (including habitat clearance works) be undertaken in accordance with a Precautionary Non-Licensed Method Statement.

COMPLETE IF LICENCE COVER IS NOT REQUIRED FOR ANY SIGNIFICANT PART OF THE RED LINE BOUNDARY: Describe any parts of the red line boundary that would not be impacted (or subject to novel pressures) as a result of the development proposal. If agreed by NatureSpace, unimpacted areas would fall outside of the area covered under the District Licence. NB: in special cases, NatureSpace may require inclusion of a Habitat Management and Monitoring Plan to enable the licence to cover habitat creation/enhancement under licence and will notify you if this is the case.	No significant areas with RLB unaffected.
--	--

2.3 OPTIONAL – EXPAND & COMPLETE IF RELEVANT: Biodiversity Net Gain

NATURESPACE RECOMMENDS THIS SECTION IS COMPLETED BY A SUITABLY QUALIFIED ECOLOGIST

Biodiversity Metric version	V 1.0.2	
Total off-site biodiversity unit requirement	13.51 habitat units	
How many of these units do you require NatureSpace to offset if not the full amount?	None – all off-site provisions made utilising wider ownership land	
Restricted delivery habitat types and their associated unit requirement to satisfy trading rules.		
Are any other nature market compensation requirements (e.g. species licensing, nutrient neutrality etc) being delivered on/off-site? If so, how many stacked and bundled units does this account for?	Onsite	Offsite
	None	None

Please Confirm or acknowledge:

The on-site Biodiversity Metric is accurate, and the on-site assessment has been completed by a suitably qualified and competent person. ☒

A copy of the complete Biodiversity Metric for the development site has been provided and images for development site baseline and post intervention are included within the metric document. – Images are within the PEA report, there is not enough space for them all in the metric ☒

NatureSpace and the Newt Conservation Partnership accept no responsibility for delivery, management or monitoring of on-site BNG units ☒

For an integrated BNG and District Licensing approach, the District Licensing requirements must be complied with in full. ☒

A copy of the report containing UKHabs survey data and habitat condition assessments for the site have been included in this application. – In the PEA and BNG reports ☒

Section 3: Confirmation/consents (Must be filled in by the developer)

Has anyone named in this form (or who would be working under the licence) had any wildlife-related convictions (see note 2 below)?	No ☒ <i>Tick to indicate answer</i>	Yes ☐ <i>Tick to indicate answer</i>	<i>If yes – provide details:</i>
--	---	---	---

I, the undersigned, confirm that:

- The habitats on-site have not changed since the survey/surveys detailed in this form were undertaken.
- Data relating to on-site measures (including capture of GCN, habitat retention, creation and management, and site maintenance and, habitat and GCN monitoring data) will be reported to the Local Planning Authority.
- Permission to access the site for monitoring purposes will be granted for employees of and/or representatives on behalf of, the Local Planning Authority.
- The information provided in this form and its attachments is true to the best of my knowledge and belief.
- I understand I will be required to sign the NatureSpace Terms and Conditions in the event that these works are considered to be high impact or otherwise high risk.

NOTE – Typed signatures are not accepted: please use an e-signature, sign and scan, or take a photo of signed page

Developer Signature:

Date:

Print Name:

Ecologist Signature:



Date: 24/02/26

Print Name: Naomi Cornwell BSc(Hons) MSc

Information supplied in this form will be treated in the strictest confidence.

Additional information can be provided in appendices if appropriate.

By submitting this form you consent to NatureSpace Partnership Limited holding your data for the purposes of contacting you with regard to the district licence, providing services to you to enable you to enter the district licensing scheme and maintaining necessary records as required under the district licence. Your personal data will be held securely. You can request to be removed from our marketing database at any time, although this may affect the service we can provide to you. We may send you email marketing messages regarding district licensing. If you do not want to receive such communications, please [CLICK HERE](#). You can view our Privacy Notice [HERE](#).

Application form version: July 2024

Section 4: Notes

1. On-site compensation is not usually a feature of a District Licence application. NatureSpace will notify you if this is an appropriate option/requirement, following review of this application form. For all on-site compensation proposals, habitat management and monitoring requirements must follow the standards set out in the Great Crested Newt Mitigation Guidelines. For any habitat creation/enhancement, this must be undertaken before development commences or within 6 months of development commencing (this may be staggered for different parcels of development land). For temporary impacts, full reinstatement of existing habitats must be complete within 12 months of impact. Where on-site measures are being relied upon as part of compensation proposals (note: impacts to habitats must be compensated for at a 4:1 ratio for lost occupied ponds, and 1:1 ratio for terrestrial habitat), the following information will be required, in a separate Habitat Management and Monitoring Plan (for further details, contact NatureSpace):
 - On-site management and monitoring:
 - Habitat creation and management proposals (including timings)
 - Site maintenance proposals
 - Period of management and maintenance (years)
 - Monitoring proposals (type, timing and pond refs)
 - Map to show locations of all habitat creation, management and monitoring
 - Site safeguarding:
 - Mechanisms for ensuring site will be safeguarded
 - Mechanisms for ensuring site will be managed & monitored
 - Details of persons/organisations who will be responsible for management, maintenance, monitoring & reporting
 - Details of funding mechanisms to ensure the above
2. No person convicted on or after 1 January 2010 of an offence under the Conservation of Habitats and Species Regulations 2017, the Conservation of Habitats and Species Regulations 2010, the Wildlife and Countryside Act 1981, the Protection of Badgers Act 1992, the Deer Act 1991, the Hunting Act 2004, the Wild Mammals (Protection) Act 1996, the Animal Welfare Act 2006 or the Protection of Animals Act 1911 (all as amended) may use the district licence without the permission of Natural England unless, in respect of that offence, either:
 - i. they are a rehabilitated person for the purposes of the Rehabilitation of Offenders Act 1974 and their conviction is treated as spent; or
 - ii. a court has made an order discharging them absolutely.
 Any request to use the licence by a person to whom this note applies will be considered (by Natural England) on its merits.
3. If detailed development proposals are not available (e.g. in the case of outline permission without reserved matters yet approved), then the development will be assessed under the scheme based on the worst-case scenario impacts (i.e. that all habitats on the development site will be lost permanently).
4. Any authorisations under the District Licence will be specific to a referenced plan and the information provided in this report. If the development proposals change subsequent to the assessment, the advice will not stand and there will be a need for reassessment to confirm the works can still be covered under the scheme. In such cases there may be additional requirements where changes lead to greater impacts.

5. Additional terms and conditions:
- a. All rights, including Intellectual Property Rights in or arising out of or in connection with the Services shall be owned by NatureSpace.
 - b. NatureSpace shall not be liable to the Client, if NatureSpace's performance of any of its obligations under the Contract is prevented or delayed by any act or omission by the Client, its employees, agents or sub-contractors or any third party or any failure by the Client to perform any relevant obligation including the Client's failure to pay NatureSpace any sums payable in relation to this application.
 - c. VAT will, where chargeable, be paid on the Fee and all other sums payable under the Contract.
 - d. The Client acknowledges that information provided and opinions and conclusions included within any NatureSpace Report will accordingly become less reliable over time as a consequence of a number of factors including changes to the Site and the character of its habitats and species and new species colonising the Site or its surroundings. The Client acknowledges that:
 - i. It can rely on the NatureSpace Report for 2 years from the date of the most recent habitat survey (or update thereof) that covers the extent of the red line boundary; and
 - ii. for all other Deliverables, the Deliverables shall (at the time these are prepared by NatureSpace in the performance of the Service) be sufficient for the Client's purposes as have been made known to NatureSpace and NatureSpace's obligations to provide the Services shall be satisfied on this basis.

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LEGEND:

- Site Boundary
- 500m Buffer Zone
- Watercourse
- Waterbody

STATUS: FOR INFORMATION ONLY

PJC

Sussex Office: Rocks Yard, Victoria Rd, Herringmonoux, Hailsham, BN27 4TQ.
T: 01323 832120.
TN28 1AE.
Kent Office: The Watermill, The Mill Business Park, Maidstone Road, Ashford.
T: 01233 225365
E: enquiries@pjcconsultancy.com
W: <https://www.pjcconsultancy.com>

CLIENT: CLO UK

PROJECT: Juhring & Hobbs Fields
Saint Hill Manor
RH19 4JY

TITLE: Waterbodies Within 500m Radius of Site Boundary

SCALE AT A4: 1:6,490	DRAWN: NC	APPROVED: TK
PROJECTION: EPSG:27700	DATE: 24/02/26	DATE: 24/02/26

DRAWING No: PJC/6866E/GCN DLL/26/V1

Basemap: Google Satellite (obtained through QuickMapServices QGIS plugin), Map data © Google

ARGUK GCN HSI Calculator

Pond Name Grid Ref		<i>Example</i> <i>SK123456</i>	WB1 TQ 37963 35989	
SI No	SI Description	SI Value	SI Value	SI Value
1	Geographic location	1.00	1	
2	Pond area	0.50	0.8	
3	Pond permanence	0.90	0.1	
4	Water quality	1.00	0.01	
5	Shade	1.00	0.2	
6	Water fowl effect	1.00	1	
7	Fish presence	1.00	1	
8	Pond Density	0.65	1	
9	Terrestrial habitat	1.00	1	
10	Macrophyte cover	0.90	0.3	
HSI Score		0.88	0.37	0.00
Pond suitability (see below)		<i>Excellent</i>		

Categorisation of HSI Score by Lee Brady

HSI Score	Pond Suitability
< 0.50	Poor
0.50 - 0.59	Below average
0.60 - 0.69	Average
0.70 - 0.79	Good
> 0.80	Excellent

Based on ARGUK advice note 5 - Great Crested Newt Habitat Suitability Index

SI Value	SI Value	SI Value	SI Value	SI Value
0.00	0.00	0.00	0.00	0.00

Appendix 7

Place Services Landscape Team comments dated 16.10.25 and Enplan lead response



Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date: 16 October 2025
Our ref: 10204

For the attention of: Planning Department, planninginfo@midsussex.gov.uk

Application ref:	DM/25/2223
Location:	Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead
Proposal/Description:	Hard paved car park with 121 spaces and toilet facilities adjacent to Saint Hill Road. Hard paved access road servicing both Juhring and Hobbs fields. Engineered grass surfaced provision of 619 spaces for temporary parking for specific events in Juhring field. Re-contouring of Hobbs field with grassed surface and provision of permanent pads for a marquee together with washroom facilities and substation with backup generator.

Thank you for requesting advice on this Full planning application from Place Services' landscape advice service. This service provides advice to planning officers to inform Mid Sussex District Council planning decisions regarding potential landscape impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

This review is based on a desktop study without a site visit of the above-referenced application and its submitted documents. Our Landscape comments are as follows:

Pre application

It is noted in the Design and Access Statement (page 8) that during pre-application, reference has been made to the importance of both the visual impact and the settling of High Weald National Landscape. Although we have not been formally involved at the pre

application meetings, we have reviewed how the application addresses these points within the submitted plans and reports.

Site context (Landscape)

The site is accessed by Saint Hill Road which runs to the east of the Manor. The site is located within the grounds of Saint Hill Manor. East Grinstead Rugby and Cricket Clubs lie to the east and north of the site. The application relates to two individual fields (Hobbs field and Juhring Field) to the north and west of the Manor. The fields are generally contained within the landscape by mature woodland planting, which is a typical feature of the parkland settling.

Landscape Character

The site is located within the Landscape Character Area (LCA) 6 High Weald. This LCA is the largest Landscape Character Area in Mid Sussex, containing the highest ground levels in West Sussex and lies wholly within the District and the High Weald Area of Outstanding Natural Beauty (AONB)/National Landscape.

Para 9.11 of the LCA recognises the characteristics of 'Parkscapes' within the landscape and the role they play in this character area. The LCA references the key issue of change impacting on the landscape. Relevant to this application are:

- Visual impact of new urban and rural development including village expansion, modern farm buildings, horse riding centres and paddocks.
- Increasing pressures for a wide variety of recreational activities.
- Gradual suburbanisation of the landscape including the widespread use of exotic tree and shrub species.

Again, relevant to the proposals, the LCA Management Objectives reference the following Land Management Guidelines:

- Avoid skyline development and ensure that any new development has a minimum impact on long and other views and is integrated within the landscape, paying particular attention to the siting of telecommunications masts.

- Conserve, strengthen and manage existing hedgerows and hedgerow trees and re-plant hedgerows where they have been lost.
- Minimise the effects of adverse incremental change by seeking new development of high quality that sits well within the landscape and reflects local distinctiveness.

High Weald National Landscape Management Plan 2024-29

The High Weald National Landscape Management Plan is the principle guidance for ensuring that the statutory purposes of the protected landscape are met. The following objectives from the Management Plan are relevant to this application and should be referred to within the application material:

Natural Systems (Geology, Soils, Water and Climate)

OBJECTIVE G1 To restore the natural function of rivers, water courses and water bodies.

The proposals should seek to protect people and communities from flooding.

The proposals include regrading level changes which may impact on the existing water table, flooding and surface water draining.

See summary and recommendations.

Dark Skies

Objective DS1 To preserve the dark skies of the High Weald AONB by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial and public premises in both existing and new developments within the High Weald, and from highways lighting.

From a landscape perspective the submitted lighting design addresses the requirements of the DS1 Objective.

Aesthetic and Perceptual Qualities

Objective PQ1 To increase opportunities for learning about and celebrating the High Weald's character and aesthetic qualities, and to promote and facilitate contributions by communities and individuals to the conservation and enhancement of the High Weald.

Objective PQ2 To protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity.

Objective PQ3 To foster and promote equitable access and informal enjoyment of the High Weald landscape and the integrated management of its resources for the enjoyment of natural beauty by all.

See summary and recommendations.

Public Realm in the High Weald AONB

Planning Principle 6

Page 73 of the High Weald AONB Management Plan recommends that:

- Historic public realm features in the AONB are given consideration as Heritage Assets and should be retained in-situ and repaired appropriately, in order to conserve their contribution to the natural beauty of the AONB.
- Partners responsible for management of roadside verges and works in their vicinity follow best practice advice, including Managing grassland road verges 2020 (plantlife.org.uk).
- Existing trees in villages and towns, including street trees, are retained, managed well, and supplemented where appropriate, to reinforce the verdant character of High Weald settlements and to help with climate adaptation.
- Design choices for new or replacement public realm infrastructure, including paving, signage and lighting, are sensitive to the character of the AONB, use traditional designs and materials, and have regard to the objectives of the Management Plan.
- New public realm soft landscaping schemes are informed by the advice in the High Weald Housing Design Guide regarding creating multi-layered planting strategies of native trees, (including street trees), hedging plants and wildflowers, avoiding ubiquitous, suburbanising planting of ornamental ground-cover shrubs or locally non-native or invasive species.

See summary and recommendations.

Section 85 Countryside and Rights of Way (CRoW) Act 2000

The planning statement accompanying the application fails to reference or justify the development proposals against Section 85 of the Countryside and Rights of Way Act. We would expect a clear narrative justifying the proposals against this act including an assessment on avoiding harm, enhancing and mitigation within the National Landscape.

Landscape Visual Impact Assessment (LVIA)

The submitted Landscape Visual Impact Assessment (LVIA) does not include a methodology outlining how the visual assessments have been undertaken and what it seeks to review. The LVIA also fails to reference to the appropriate guidance, such as GLVIA 3rd Edition and the more recent TGN 05/23.

The 8no. viewpoints selected to assess the proposals (Fig 14) fail to include several locations where according to the 'Combined Zone of Theoretical Visibility' (Fig 13) views to the site are unfiltered. These are typically to the south to western arc of the development site.

The marked up photographic viewpoints 1 to 8 should specifically make reference to lighting columns and the 'annual temporary structures'.

The lighting columns are set to a height of 6.0-6.2m. It is unclear whether the lighting columns have been assessed by the LVIA.

The application itself seeks to include infrastructure to support 'annual temporary structures' in the form of an event and catering tent. If these uses are part of the submitted application, we would expect these structures (although temporary) to be assessed within the LVIA, especially when considering the nature and scale of the use within a National Landscape. The proposed toilet blocks are single storey and (if suitably elevated), will have minimal visual impact on the wider landscape.

Site proposals and details (Landscape)

The proposed regrading of Hobbs Field (1500-1950mm) should be referenced in greater detail. Sections, topographical plans both linked to the landscape proposal should be produced to accompany the application. If the surface is specified as permeable, what will the implications of this be when the 'annual temporary structures' are in place? Any proposed landscape features should be designed to address and reflect the historic context of the site and the National Landscape Objectives G1 and PQ1-3.

The southern section of the plant enclosure (1093 67 A 23.09.2025) would benefit from some additional landscape planting to help screen this structure.

Summary and recommendations

The following recommendations listed below relate to the landscape elements of this application.

- The proposals should include additional information regarding the proposed level changes on Hobbs Field which may impact on the existing water table, flooding and surface water draining. Topographical plans, sections and technical details of the landscape treatment should be produced.
- The application should provide additional justification against Section 85 Countryside and Rights of Way (CROW) Act 2000.
- The Landscape Visual Impact Assessment should be updated to address the comments raised in this response, including;
 - An assessment of the viewpoints to the south/west,
 - An assessment of the visual implications of the lighting columns and the 'annual temporary structures',
 - A methodology outlining how the visual assessments have been undertaken and what it seeks to review.
- Light column colour has not been specified or referenced within the application reports. There is guidance on the use of colour within the National Landscape, this should be referenced to inform the proposals.
- The elevational design and specification of the toilet blocks should also reference and be informed by the guidance on the use of colour within the National Landscape.

- Detailed plans outlining the planting specification, hard and soft landscaping and boundary treatment should be produced (referencing the appropriate guidance/s for the National Landscape). These plans could be submitted as planning conditions.
- Detailed Landscape Management Plan to be submitted (referencing the appropriate guidance/s for the National Landscape). This could be submitted as planning conditions.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Place Services – Landscape Team

Email: landscape@essex.gov.uk



Place Services provide landscape advice on behalf of Mid Sussex District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of Place Services Landscape Team

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below the responses on behalf of the applicants, authored by Enplan to the comments made by Place Services Landscape team in its consultation response dated 21st December 2025.

Place Service's comments	Enplan's response
This letter sets out our consultation response on the updated supporting plans and landscape impact of the application. In our original response dated 16th October, we requested a series of further supporting plans and updated details to address gaps in the application submission. Each of these points have been reviewed again.	As identified in Place Services response, these plans and updated details were submitted with the new LVIA prepared by Enplan.

Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD

Direct line 01293 663519 **Email** nigel.abbott@dmhstallard.com **Main line** 01293 605000 **Fax** 01293 246016

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Detailed plans and sections showing the regrading of Hobbs Field have been produced. These plans include details of earthworks, drainage and details of other associated works. A drainage strategy and plan, as well as indicative sections detailing the proposed and existing level changes have also been produced. Sections detailing the proposed temporary structure elevations are also now included.	A supplementary submission of further landscape related plans and documents has been made. These drawings comprise amended illustrative landscape masterplans, as well as plans and documents for determination. These are General Arrangement plans, detailed Planting Plans, a set of typical construction details for the hard landscape elements, further cross sections and a planting specification and maintenance/management document.
A Landscape and Visual Impact Assessment (LVIA) has been submitted (Oct 2025) which follows the appropriate guidance set out by the Landscape Institute 3rd Edition 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3).	Noted.
The LVIA includes reference to all relevant policy and guidance including the Countryside and Rights of Way Act 2000.	Noted.
The LVIA viewpoint analysis still only includes the original 8no. viewpoints. However, paragraph 6.3 of the LVIA states that, <i>"The 6m high lighting columns are not included in the ZTV because these would be imperceptible from beyond a few hundred metres from the site and a ZTV with markers at 6m would, therefore, provide a false impression of the real visibility of the development in the wider landscape. The visual effects of the lighting columns during daylight hours are included in the visual assessment of local views and a specific nighttime</i>	This is correct

<i>effects assessment section is also provided."</i> The LVIA has assessed the impact of the temporary parking and associated structures. We are satisfied with the conclusions of the LVIA. If minded for approval, we would recommend the following conditions for your consideration: - A comprehensive landscape proposal should be submitted including details of all soft and hard landscape and boundary treatments. The soft landscape plan should include a landscape specification and planting schedule, with details of quantity, species, size/type (bare root, container etc). It should also include details of implementation and materials (i.e. soils and mulch) and any protection measures that will be put in place (i.e rabbit guards). The hard landscape plan should include details of all hard surface materials and boundary treatments to be used within the development with a timetable for implementation, including all means of enclosure and boundary treatments, such as walls and fences. - Details of initial aftercare and long-term maintenance of soft and hard landscape assets will also need to be provided in the form of a landscape management and maintenance plan. This should include a schedule of works and cover a minimum period of 5 years. The submission of the	Noted. The supplementary submission of plans and documents submitted for determination referred to above is considered to cover all of these matters and by being submitted for determination it is intended that a subsequent pre commencement landscape condition(s) can be avoided. Below is the list of landscape plans submitted in December 2025 (all submitted for approval except the Illustrative Masterplans): Illustrative Masterplans 1232-ENP-SI-00-DR-L-90100 P04 1232-ENP-SI-00-DR-L-90101 P05 1232-ENP-SI-00-DR-L-90102 P04 General Arrangement Plans 1232-ENP-SI-00-DR-L-90103 P06 1232-ENP-SI-00-DR-L-90104 P05 1232-ENP-SI-00-DR-L-90105 P04 Planting Plans 1232-ENP-SI-00-DR-L-90300 P05 1232-ENP-SI-00-DR-L-90301 P05 1232-ENP-SI-00-DR-L-90302 P05 1232-ENP-SI-00-DR-L-90303 P05 1232-ENP-SI-00-DR-L-90304 P03 Below is the list of supplementary landscape plans and documents submitted in February 2026 (all for approval):
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landscape management plan can be a condition of any consent.	Typical Details: Hard and Soft Landscape 1232-ENP-SI-00-DR-L-90400 P02 (Landscape Typical Paving Details Sheet 1) 1232-ENP-SI-00-DR-L-90401 P02 (Landscape Typical Paving Details Sheet 2) 1232-ENP-SI-00-DR-L-90430 P02 (Landscape Typical Planting Details Sheet 1) 1232-ENP-SI-00-DR-L-90431 P02 (Landscape Typical Planting Details Sheet 2) 1232-ENP-SI-00-DR-L-90440 P02 (Landscape Typical Furniture Details Sheet1) 1232-ENP-SI-00-DR-L-90441 P02 (Landscape Typical Furniture Details Sheet2) Sections 1232-ENP-SI-00-DR-L-90500 P02 (Landscape Sections) Documents 1232-ENP-SI-00-RP-L-90901 P01 (Landscape Outline Specification and Landscape Management Plan) 1232-ENP-SI-00-RP-L-90903 P04 (Landscape Planting Schedule)
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We would also ask Place Services to note that the description of development for the scheme is to be amended to the following:

“Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external



lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)”

Can you please reconsult the Place Services Landscape Team with these responses.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

Place Services Ecology comments dated 22.01.26 and response from Enplan



Andrew Watt
Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Our ref: 12505
Date: 22 January 2026

By email only: Planning Department, planninginfo@midsussex.gov.uk

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Sussex District Council planning decisions with regard to potential ecological impacts from development.

Application: DM/25/2223
Location: Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead
Proposal: Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, Amended Description, Plans, Documents)

Thank you for re-consulting Place Services on the above full planning application.

No ecological objection	☐
No ecological objection subject to attached conditions	☒

Further information required/Temporary holding objection	☐
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

Following the submission of the amended block plan, we have reviewed the revised Preliminary Ecological Appraisal (PJC, December 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures.

We have also reviewed the information submitted relating to mandatory biodiversity net gains this includes the Biodiversity Net Gain Feasibility Assessment (PJC, December 2025) and the Statutory Biodiversity Metric (December 2025).

We are still satisfied that there is sufficient ecological information available to support determination of this application.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable. Please note that we have been instructed to leave matters relating to Great created newt to NatureSpace.

The mitigation measures identified in the Preliminary Ecological Appraisal (PJC, December 2025) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality. This includes appropriate precautionary measures for reptiles within Appendix VI of the Preliminary Ecological Appraisal (PJC, December 2025). Therefore, we do not recommend that a reptile method statement is now secured via a separate condition.

The Preliminary Ecological Appraisal (PJC, December 2025) advises 'A parcel of ancient woodland, North Wood, was recorded immediately adjacent to the Site boundary, south-of Juhring field and north of Hobbs Field.' Therefore, it was recommended that a strict minimum 15m no construction buffer zone must be implemented between the ancient woodland (irreplaceable habitat) and the development footprint.

If any external lighting is to be proposed, it is advised that a sensitive lighting scheme is developed to minimise any impacts. This must follow the Guidance Note 8/23 Bats and artificial lighting (The Institute of Lighting Professionals & Bat Conservation Trust). In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- Light levels should be as low as possible as required to fulfil the lighting need.

- Warm-White lights should be used preferably at 2700k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- If light columns are required, they should be as short as possible as light at a low level reduces the likelihood of any ecological impact. However, the use of cowl, hoods, reflector skirts or shields could also be used to prevent horizontal spill.
- Movement sensors and timers could be used to minimise the 'lit time'.

With regard to mandatory biodiversity net gains, it is highlighted that we support the submitted Biodiversity Net Gain Feasibility Assessment (PJC, December 2025) and the Statutory Biodiversity Metric (November 2024). Biodiversity net gains is a statutory requirement set out under [Schedule 7A \(Biodiversity Gain in England\) of the Town and Country Planning Act 1990](#) and we are satisfied that submitted information provides sufficient information at application stage. As a result, a Biodiversity Gain Plan should be submitted prior to commencement, which also includes the following:

- a) A Biodiversity Gain Plan form (Ideally using the Government's template: <https://www.gov.uk/government/publications/biodiversity-gain-plan>)
- b) The completed metric calculation tool showing the calculations of the pre-development and post-intervention biodiversity values.
- c) Pre and post development habitat plans.
- d) Legal agreement(s)
- e) Biodiversity Gain Site Register reference numbers (if using off-site units).
- f) Proof of purchase (if buying statutory biodiversity credits at a last resort).

In addition, a [Habitat Management and Monitoring Plan](#) (HMMP) should be secured for all [significant on-site enhancements](#). However, it is indicated that Mid Sussex do not classify minor development as significant on-site enhancements. As a result, we are satisfied that HMMP is not likely to be required.

The amended plans still include off-site enhancements within the blue line boundary. Therefore, it is reiterated that this will need to be registered on the biodiversity gain site register and will require a Habitat Management and Monitoring Plan (HMMP) and legal agreement with the Council or a responsible body as part of the registration to secure the enhancements for the 30-year period. As a result, the applicant is advised that it may be preferable to approach an off-site provider to meet the 10% biodiversity net gain requirement. This matter will need to be addressed as part of the biodiversity gain condition.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy

Framework (December 2024). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

“All mitigation measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (PJC, December 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

2. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY

“Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the Preliminary Ecological Appraisal (PJC, December 2025), shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) *Purpose and conservation objectives for the proposed enhancement measures;*
- b) *detailed designs or product descriptions to achieve stated objectives;*
- c) *locations of proposed enhancement measures by appropriate maps and plans (where relevant);*
- d) *persons responsible for implementing the enhancement measures; and*
- e) *details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter.”

Reason: To enhance protected, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

3. **PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

“Prior to occupation, a “lighting design strategy for biodiversity” in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) *identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and*
- b) *show how and where external lighting will be installed (through provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.*

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

Biodiversity Gain condition

Natural England advises that the biodiversity gain condition has its own separate statutory basis, as a planning condition under [paragraph 13 of Schedule 7A of the Town and](#)

[Country Planning Act 1990](#). The condition is deemed to apply to every planning permission granted for the development of land in England (unless exemptions or transitional provisions apply), and there are separate provisions governing the Biodiversity Gain Plan.

The local planning authority is strongly encouraged to not include the biodiversity gain condition, or the reasons for applying this, in the list of conditions imposed in the written notice when granting planning permission. However, it is highlighted that biodiversity gain condition could be added as an informative, using [draft text](#) provided by the Secretary of State:

“Biodiversity Net Gain

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition”) that development may not begin unless:

- (a) Biodiversity Gain Plan has been submitted to the planning authority, and*
- (b) the planning authority has approved the plan.*

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Mid Sussex District Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.”

Please contact us if you have any queries in relation to this advice.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)
Senior Ecological Consultant

Place Services at Essex County Council



Place Services provide ecological advice on behalf of Mid Sussex District Council.

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of Place Services Ecology Team

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below the responses on behalf of the applicants, authored by PJC Consultancy to the comments made by Place Services Ecology team in its consultation response dated 22 January 2026.

PJC Consultancy comment "This letter from Place Services essentially outlines their recommended conditions pertaining to ecology. These will be dealt with as conditions once planning is granted, as they could be subject to change, and the wording within the conditions is important to know before producing any plans/reports. PJC Consultancy are ready to produce the biodiversity enhancement strategy, and will supply a suitably qualified ecologist from PJC for the ECoW (habitat clearance supervision) as and when the time comes.

The lighting strategy will require the appointment of a specialist lighting designer, who PJC Consultancy will be able to advise (if need be) on lighting for ecology.

Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD

Direct line 01293 663519 **Email** nigel.abbott@dmhstallard.com **Main line** 01293 605000 **Fax** 01293 246016

Offices in London, Gatwick, Guildford, Brighton, Horsham and Hassocks. Website www.dmhstallard.com

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PJC Consultancy's understanding of the comment regarding BNG is simply that BNG should not be a condition, so essentially reiterating that it must be a pre-validation requirement, which is why PJC Consultancy have already produced a BNG Feasibility Assessment report for the application submission. The BNG results includes areas for off-site gains, and indicates potential for a 60% net gain in biodiversity across the site and off-site areas (50% more than the required 10%).

We would also ask Place Services to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult the Place Services Ecology Team with these responses.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

Southern Water comments dated 18.12.25 and response from QED Consultancy



Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Your ref
DM/25/2223

Our ref
DSA000047278

Date
18th December 2025

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, Amended Description, Plans, Documents)

Site: Juhring and Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead, RH19 4JY.

Thank you for your correspondence. Please see our comments below regarding the above planning consultation application.

Development Site is not within Southern Water's Supply Area

The development site is not located within Southern Water's statutory area for water supply services. Please contact South East Water who are the relevant statutory undertaker.

Existing Water Main

The 610 mm diameter water main requires a clearance of 6 metres on either side of the water main to protect it from construction works and to allow for future maintenance access. No excavation, mounding or tree planting should be carried out within 6 metres of the external edge of the public water main without consent from Southern Water. All existing infrastructure, including protective coatings and cathodic protection, should be protected during the course of construction works. Please refer to: <https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>

Condition

In order to protect water apparatus, Southern Water requests that if consent is granted, the following condition is attached to the planning permission; The developer must agree with Southern Water, prior to commencement of the development, the measures to be undertaken to protect/divert the public water supply main.

Proposed Disposal to ground from package treatment plant

The Environment Agency should be consulted directly by the applicant regarding the use of a private wastewater treatment works which disposes of effluent to sub-soil irrigation.

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewerage-sector-guidance-approved-documents/

No Soakaways should be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>

<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

<https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991.



For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,
Future Growth Planning Team
southernwater.co.uk/developing-building/planning-your-development



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of Southern Water

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below the responses on behalf of the applicants, authored by QED Structures, to the comments made by Southern Water's Future Growth Planning Team in its consultation response dated 18th December 2025 (ref: DSA000047278).

1. **Trunk main:** We note the 610mm trunk water main and the easement corridor. The proposed car park is a permeable surface above/within this corridor (no buildings or deep foundations). The detailed design and construction method will be agreed with Southern Water to protect the main. No works within the easement will proceed without Southern Water's approval.

2. **SuDS maintenance:** The SuDS/drainage will be private (not adopted) and maintained as set out in the maintenance section of the report.

We would also ask Southern Water to note that the description of development for the scheme is to be amended to the following:

Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD
Direct line 01293 663519 Email nigel.abbott@dmhstallard.com Main line 01293 605000 Fax 01293 246016

Offices in London, Gatwick, Guildford, Brighton, Horsham and Hassocks. Website www.dmhstallard.com

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"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult Southern Water with this response.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

**MSDC Environmental Protection comments dated 17.09.25 as updated on 24.12.25
and response from applicants**

From: planninginfo@midsussex.gov.uk <planninginfo@midsussex.gov.uk>
Sent: 17 September 2025 19:38:40 UTC+01:00
To: "planninginfo" <planninginfo@midsussex.gov.uk>
Subject: Mid Sussex DC - Online Register - Consultee Comments for Planning Application
DM/25/2223

Consultee comments

Dear Sir/Madam,

A consultee has commented on a Planning Application. A summary of the comments is provided below.

Comments were submitted at 17/09/2025 7:38 PM from Mr Nick Bennett on behalf of Environmental Protection.

Application Summary

Reference:	DM/25/2223
Address:	Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead West Sussex
Proposal:	Hard paved car park with 121 spaces and toilet facilities adjacent to Saint Hill Road. Hard paved access road servicing both Juhring and Hobbs fields. Engineered grass surfaced provision of 619 spaces for temporary parking for specific events in Juhring field. Re-contouring of Hobbs field with grassed surface and provision of permanent pads for a marquee together with washroom facilities and substation with backup generator.
Case Officer:	Andrew Watt

[Click for further information](#)

Comments Details

Comments:	The proposed development is close to existing residential dwellings. Should planning permission be granted, given the potential for construction phase and operational activities to negatively impact the amenity of existing residents, Environmental Protection recommends conditions to control noise and disturbance from this development. Additionally, given the traffic movements that will be generated as a result of the development, and assuming it is greater than 1 hectare in size, an air quality condition is recommended. Conditions: Construction hours: Works of construction, including the use of
-----------	--

plant and machinery, necessary for implementation of this consent shall be limited to the following times:

Monday to Friday 08:00 - 18:00 hours

Saturday 09:00 - 13:00 hours

Sundays and Bank/Public Holidays: no work permitted.

Deliveries (Construction Phase): Deliveries or collection of plant, equipment or materials for use during the construction phase shall be limited to the following times:

Monday to Friday: 08:00 - 18:00 hours

Saturday: 09:00 - 13:00 hours

Sunday & Public/Bank holidays: None permitted

Plant Noise - The rating level of the noise emitted from fixed plant and equipment (mechanical and electrical) located at the site shall not exceed 37dB (daytime) and 29dB (night) at any premises used for residential purposes surrounding the site when assessed in accordance with BS 4142:2014+A1(2019).

Air Quality: Prior to the commencement of the use hereby permitted, the details of a scheme of mitigation measures to improve air quality relating to the development shall be submitted and approved in writing by the Local Planning Authority. The scheme be in accordance with, and to a value derived in accordance with, the Air quality and emissions mitigation guidance for Sussex which is current at the time of the application. All works which form part of the approved scheme shall be completed before any part of the development is used for parking and shall thereafter be maintained in accordance with the approved details.

Informative – In order to ensure approval, we strongly recommend that the above AQ mitigation scheme is agreed in advance with the Council's Air Quality Officer.

Reasons – To accord with DP29

Kind regards

From: planninginfo@midsussex.gov.uk <planninginfo@midsussex.gov.uk>
Sent: 24 December 2025 12:37:31 UTC+00:00
To: "planninginfo" <planninginfo@midsussex.gov.uk>
Subject: Mid Sussex DC - Online Register - Consultee Comments for Planning Application DM/25/2223

Wishing you a Merry Christmas and a Happy New Year. Although our offices and phone lines are closed for the Christmas period from 4pm on 24th December 2025 and reopening on Monday 5th January 2026, most of our services can be accessed online through our [website](#).

All emails will be responded to on our return on 5th January.

Consultee comments

Dear Sir/Madam,

A consultee has commented on a Planning Application. A summary of the comments is provided below.

Comments were submitted at 24/12/2025 12:37 PM from Mr Nick Bennett on behalf of Environmental Protection.

Application Summary

Reference:	DM/25/2223
Address:	Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead West Sussex
Proposal:	Change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)
Case Officer:	Martin Dale

[Click for further information](#)

Comments Details

Comments: The new information does not affect our previous comments (18/9/25) except for the previously recommended AQ condition, which is now not necessary, as the applicant has pointed out that the development is not introducing new traffic to the area, it is making the existing grass car park less prone to damage.

Kind regards



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of MSDC Environmental Protection Team

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today, please find below the responses on behalf of the applicants to the comments made by MSDC's Environmental Protection team in its consultation responses dated 17 September 2025 and 24 December 2025.

It is noted that response raises no objections and recommends the imposition of a number of planning conditions should planning permission be granted. On behalf of the applicants we confirm that the construction hours condition is agreed, the deliveries for the construction phase is agreed and the plant noise equipment condition is agreed.

A Construction Environment Management Plan has been prepared by MacConvilles and is attached.

It is noted that the subsequent response dated 24 December 2025 confirmed that the previously recommended Air Quality condition is now not necessary.

Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD
Direct line 01293 663519 **Email** nigel.abbott@dmhstallard.com **Main line** 01293 605000 **Fax** 01293 246016

Offices in London, Gatwick, Guildford, Brighton, Horsham and Hassocks. Website www.dmhstallard.com

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We would also ask MSDC's Environmental Protection team to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult MSDC's Environmental Protection team with these responses.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects



Church of Scientology Religious Education College Institute.

Construction Environment Management Plan.

25th February 2026.

Project Title / Document Title	St Hill
Client / Developer Name	Church of Scientology, Religious Education College, Inc
Project Number / Reference	Saint Hill
Prepared By / Author	Robert Francis – MacConvilles
Approved By / Authorising Manager	Matthew Cook - Carnegie
Prepared date	25 th February 2026
Version	B

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Introduction

Purpose of the CEMP

The CEMP sets out a clear framework for managing and mitigating environmental impacts during the construction phase of development. Its primary aim is to avoid, minimise, and control potential adverse effects on sensitive receptors, habitats, and local communities while ensuring compliance with all relevant legislation, planning conditions, and environmental commitments. It integrates best practice measures for pollution prevention, waste management, and biodiversity protection into day-to-day construction activities and establishes clear roles and responsibilities for all parties involved. The plan also serves as a living document, subject to regular review and updates to reflect changing site conditions, legislative requirements, and industry standards.

This CEMP supports the discharge of planning conditions by demonstrating how environmental risks will be managed and monitored throughout the project. It provides site-specific operational controls and method statements to prevent harm to protected species and habitats, manage risks such as dust, noise, vibration, and water pollution, and minimise disruption to neighbouring properties. Ultimately, the CEMP ensures that construction activities are carried out responsibly, with robust monitoring and adaptive management to maintain compliance and deliver sustainable outcomes.

Scope of Works

The proposed works are for the infrastructure requirements relating to the COSRECI annual event requiring car parking and access requirements. The proposed works include the construction of a WC block, generator enclosure, below ground concrete ring beam and additional parking consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and an additional overflow car park reinforced ground surfacing with grass infill for up to 570 car spaces and access road. There are also requirements for dealing with surface water strategy, foul water and associated landscaping.

Link to Planning Conditions

This is related to the planning for 1093 St Hill project in anticipation of planning conditions which may be requested.

Associated Documents

This document is to be read in accordance with the Design & Access Statement and supporting documents as per planning application reference DM/25/2223 (Planning Ref Number).

CEMP Development

The Construction Environmental Management Plan (CEMP) is intended to be a dynamic and iterative document that remains relevant throughout the entire construction phase. It will be regularly reviewed and updated to reflect changes in site conditions, legislative requirements, and best practice standards. This approach ensures that any new risks, findings, or ecological constraints identified during works are promptly incorporated into the plan. The CEMP will be shared with all relevant stakeholders, including contractors and subcontractors, to guarantee that environmental requirements are communicated effectively and integrated into daily operations. All details within the document should be treated as compulsory unless otherwise agreed in writing by the Local Planning Authority, and stakeholders are expected to align this plan with their existing site policies and procedures.

By maintaining its status as a “live document,” the CEMP provides flexibility to adapt to unforeseen circumstances, such as the discovery of protected species or changes in construction methodology. If such events occur, works will cease immediately in the affected area until appropriate mitigation measures are developed and approved. This iterative process ensures compliance with environmental legislation and planning conditions while safeguarding habitats and species. Ultimately, the live nature of the CEMP supports proactive environmental management, continuous improvement, and transparent communication among all parties involved in the project.

Project Team

Client: COSRECI (Church of Scientology, Religious Education College, Inc)	
Address	Saint Hill Rd, East Grinstead
Post Code	RH19 4JY
Contact	Maia Dube
Telephone	<u>01342 324571</u>
Email	mdube@cmouk.org
Lead Designer: Carnegie	
Address	Astral Towers Betts Way Crawley
Post Code	RH10 9XA
Contact	Matthew Cook
Telephone	01959 572501
Email	matthew@carnegiegroup.co.uk
Electrical Engineer: MCA	
Address	8 Newhouse Business Centre Old Crawley Road, Horsham West Sussex
Post Code	RH12 4RU
Contact	Gary Nolan
Telephone	01293 851490
Email	garynolan@mcaltd.co.uk
Civil Engineer: QED Structures	
Address	302 Davina House, 137-149 Goswell Road London,
Post Code	EC1V 7ET
Contact	Mike Tuna
Telephone	0207 1830770
Email	miket@qedstructures.co.uk
Contract Administrator / Quantity Surveyor: MacConvilles Ltd	
Address	Heversham House, 20-22 Boundary Road, Hove
Post Code	BN3 4EF
Contact	Rob Francis
Telephone	01273 692611
Email	robert.francis@macconvilles.com
Principal Designer: MacConvilles Ltd	
Address	Heversham House, 20-22 Boundary Road, Hove
Post Code	BN3 4EF

Contact	Anna Bataille
Telephone	01273 692611
Email	Anna.Bataille@macconvilles.com
Principal Contractor: Shore Group	
Address	First Floor, South Heversham House, 19 Boundary Rd, Brighton and Hove, Hove
Post Code	BN3 4EF
Contact	Rob Green
Telephone	01273 692611
Email	rob.green@theshoregroup.co.uk

Project Description / Site Context

Site Location & Description:

The proposed site location is split between 2 fields at Saint Hill COSRECI site. The upper field known as Juhring will provide the informal overflow temporary parking for the Churchs annual event as well as the formal car park. The lower field (Hobbs Field) will have the temporary tent. The sequencing of the works will be as follows:

1. Installation of site setup and temporary entrance formed
2. Installation of main access road to Hobbs Field
3. Construction of Hobbs Field foundations and WC block as well as construction of formal car park
4. Informal car park to follow
5. Followed by tarmac surface course to the entrance area upon completion

The temporary entrance will be formed immediately to ensure all construction vehicles are held on site and not back onto the main highway. The gates will be set back and managed by a gateman at all times. At completion this entrance will be upgraded to final specification.

The site welfare will be located on the informal car park until the formal car park is completed, at which point the welfare will be relocated to the formal car park to allow the informal car park to be completed.

As soon as the temporary entrance is complete and can accept construction vehicles, the main access road and drainage will be constructed as well as the commencement of the formal car park. This will allow construction vehicles to access the Hobbs field and construct the foundations. The foundations will be completed as early as possible to ensure the events tent construction is not delayed.

The informal car park will commence as soon as the main access road is completed and will continue until project completion.

Key Site Constraints:

1. Reduce noise & dust, utilise water in dryer spells and noise baffles to plant where possible
2. Heras fence buffers for ecology
3. Ensure no construction traffic impacts or blocks the highway, traffic management and available turning area and vehicle hold points will be located on site.
4. Maintain operation of Church activities
5. Maintain security levels and ensure separation for public safety

Refer to Appendix A for site logistics at entrance and welfare arrangements.

Grid Reference / Postcode:

Grid Reference	X (Eastings)	Y (Northings)	Latitude	Longitude	Description (Click to Edit)	Address	Postcode
TQ 38236 35878	538236	135878	51.105537	-0.0268385	St Hill East Grinstead	RH19 4JY	RH19 4JY



Site Assessments

Soil and Ground Conditions

A survey has been undertaken by Soil Technics report number STW6679-R01-Rev_A to access soil conditions including the presence of tree roots.

Waste Acceptance Criteria certificate is available within Soil Technics Report.

Existing Habitats and Ecological Value

PJC Consultancy Ltd was commissioned by CLO UK to provide a Preliminary Ecological Appraisal for a parcel of land at Juhring Field & Hobbs Field, Saint Hill Manor, Saint Hill Road, East Grinstead, West Sussex RH19 4JY. The purpose was to classify the habitats present, highlight the potential of the site to support protected species, and recommend suitable avoidance, mitigation, compensation and ecological enhancement measures where appropriate. Key considerations from the report for construction stage:

- Ancient Woodland, North Wood adjacent to the site boundary, south-of Juhring field and north of Hobbs Field. Our mitigation:
 - A strict minimum 15m no construction buffer zone must be implemented between the ancient woodland and the development footprint.
 - A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development. The proposed works will be carried out during daylight hours over the summer months therefore construction stage operations should not impact hours between dusk to dawn.
- Habitat of Principal Importance (HPI), One parcel of broadly classified deciduous woodland HPI, North Wood, was recorded immediately adjacent to the Site boundary, south-of Juhring field and north of Hobbs Field. Our mitigation:
 - minimum 5m no construction buffer zone must be implemented between the woodland HPI and the development footprint.
 - A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development. The proposed works will be carried out during daylight hours over the summer months therefore construction stage operations should not impact hours between dusk to dawn.
- Bats (Foraging and Commuting) considerations identified in report
 - A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development. The

proposed works will be carried out during daylight hours over the summer months therefore construction stage operations should not impact hours between dusk to dawn.

- Badger considerations identified in report
 - A pre-work survey to be carried out prior to construction to ensure no badgers remain on site.
 - All chemicals to be stored securely away from foraging animals
- Dormice consideration in report
 - All habitat clearance works should be undertaken under the instruction of a precautionary Non-Licensed Method Statement.
- Great Crested Newts & reptiles
 - All habitat clearance works should be undertaken under the instruction of a precautionary Non-Licensed Method Statement.
- Nesting birds consideration in report
 - Habitat clearance works should be undertaken outside the main nesting bird season (March- September inclusive). Should this not be possible, all trees and buildings must be inspected by an ecologist to determine the presence/absence of any nesting birds immediately prior to clearance.
- Possible presence of Asbestos
- An asbestos demolition survey has been instructed and due to be completed prior to commencement, precautions to be undertaken in line with Control of Asbestos Regulations 2012.

Site operations

Working hours / Deliveries and transport of materials, plant, and equipment to site

The working hours for the development site (including any demolition and construction activity) and deliveries including the transport of materials, plant, and equipment to the development site shall only take place during the following hours.

08:00 to 18:00 on Monday to Friday

08:00 to 13:00 on Saturdays

No working on Sundays or Public Holidays

These working hours cover operations and work which are audible at the site boundary. Because the site is located within ecological interest, no works will be undertaken outside of these hours.

Deliveries and the movement of large vehicles will also not be allowed out of these time constraints. Vehicle movements and deliveries will be manned to ensure that vehicle movements are controlled and managed by the gateman and banksman on site.

The works extend close to the site boundary therefore the works will be sequenced to allow adequate material storage whilst considering double handling and reducing vehicle movements on site. To reduce the impact we will ensure that materials are delivered and unloaded as close to their final position as possible. Due to the nature of the sequencing and programming, we will be avoiding storage of aggregates where possible, all aggregates will be delivered to final location and immediately compacted, this will reduce vehicle movements as well as risk of dust in dry conditions. Any excavated materials will be banded to reduce risk of dust.

Noise and vibration

As well as being a health and safety concern for workers, we understand that noise and vibration can be a nuisance to neighbours. To this end the following general measure will be in place throughout the works.

- All vehicles and plant used during the development will be maintained in good and efficient working order, and in accordance with manufacturer's specification.
- All vehicles, mechanical plant, and machinery used during the development shall be fitted with proper and effective silencers (where available AND/OR in compliance with health & safety requirements) and shall be maintained in good and efficient working order.
- All plant and machinery in intermittent use shall be shut down in the intervening periods between works.
- Plant and machinery capable of generating significant noise and vibration levels will be operated in a manner to restrict its duration.
- Static plant and machinery shall be sited as far away as possible from inhabited buildings or other noise sensitive locations.
- All compressors shall be 'noise reduced' models that are fitted with properly lined and sealed acoustic covers which shall be kept closed whenever the machines are in use. All ancillary pneumatic percussion tools shall be fitted with mufflers or silencers of the type recommended by the manufacturers.
- Wherever possible battery powered equipment shall be used instead of diesel- or petrol-powered generators.
- The handling of materials shall be conducted in such a manner that minimises noise, including minimising drop heights into hoppers and lorries.

The site is bounded by extensive vegetation which acts as a natural sound baffle. Operations will be limited to surface removal only and there are no deep excavations planned.

Dust and Mud

The dust produced by construction operations has a high silica content and is harmful to the health of both operatives and those in the surrounding areas. The Principal Contractor will ensure that the following control measures are in place to manage this hazard and to be able to demonstrate that this is ongoing throughout the life of the project.

- All plant and equipment shall be maintained in accordance with manufacturer's recommendations to ensure emissions to atmosphere are minimised.
- Any equipment used to cut paving blocks, kerbs, flagstones etc. shall be operated with a water suppression attachment or a dust filter.
- Engines of plant, machinery, and lorries shall be turned off at all times when not in use.
- Delivery activities, plant, stockpiled materials and/or any other activities liable to significant dust generation shall be located as far away as possible from the development site boundaries and neighbouring properties.
- Stored materials liable to dust generation shall be dampened down, covered with tarpaulin, or otherwise contained as far as reasonably possible.
- Drop heights from conveyors, loading shovels, hoppers, and other loading or handling equipment shall be minimised, and fine water sprays should be used on equipment where necessary.
- Skips, chutes, and conveyors shall be covered and if necessary enclosed to ensure that dust does not escape.
- All vehicles carrying dusty materials shall be securely covered. Water suppression shall be used in dry conditions to reduce dust emissions (e.g. mobile bowsers or fixed sprayers as appropriate). A water suppression contingency plan should be included detailing water supply to site and what equipment will be kept available (e.g. number and size of bowsers, sprinklers, mist canons etc.)
- As well as reducing airborne dust within the site, dust and debris must not be transported out of the site on vehicle wheels. The public highway must be kept in a condition whereby it is mud free. This is applicable to both roads and pavements. To this end a wheel wash unit is to be installed near to the site exit point. This shall be a purpose made unit enabling water to be recycled and contained. At no time are jet washers to be used.
- Road sweepers are to be deployed if conditions worsen to the extent that wheel washing is no longer sufficient.

Air quality

The quality of air especially in rural areas is of concern around construction sites and to this end the Project Team will ensure that All Non-Road Mobile Machinery used on site must be compliant with the Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations

2018. Evidence that vehicles complying with appropriate emission limits are being utilised by the site shall be available on request.

Artificial lighting

Specific task lighting may be required during the works, however temporary flood lighting of the site won't be necessary as the site is to be completed during the summer period and no nighttime working will be required. In the event lighting is required:

- Security lights, and any other obtrusive external lighting shall be sensitively located so as to avoid nuisance to neighbouring properties as well as wildlife and should only provide the necessary luminance for the relevant task(s).
- Lighting schemes shall be compliant with the Institution of Lighting Professionals Guidance Note 01/21 "The Reduction of Obtrusive Light".

Parking

On site parking will be made available to all operatives and visitors throughout the construction stage. The temporary vehicle entrance gates are set back from the main highway therefore allowing vehicles to be held at the entrance gate and directed to contractor parking.

Deliveries

Material and plant deliveries will be made outside of peak hours to avoid school and rush hour traffic. There is an off-loading point and turning circle available on site to allow all construction vehicles to be off-loaded safely off the highway. Where deliveries are constant such as tarmac deliveries, we will operate a holding location and stagger the deliveries to ensure multiple large vehicles are not on site at the same time. Deliveries will be made during normal construction working hours with no out of hours deliveries.

Site fencing

The existing site is currently fenced, this will be maintained during the works. Heras fencing and construction gates will be added to the existing layouts to ensure separation of general public and construction works. The strategy is to maintain the security fence at all times and use local heras fencing during removal and replacement.

Site Traffic

During the works, we expect there to be approximately 10 vehicles per day accessing the site,. We will ensure car sharing is carried out where reasonably possible. Site deliveries will be an additional approximately 10 vehicles per day. Delivery vehicles will generally 20tonne trucks for aggregates, this will be sequenced to ensure reduced traffic on local roads as well as reduced traffic on site. The tarmac deliveries will be concentrated to 2 to 3 days at a time, this

will be advised to the neighbours, however we will limit tarmac deliveries to one at a time on site to reduce congestion.

All construction traffic will be advised to access site via A264 or A22 towards East Grinstead and egress site in the same manner.

On site services

The site is currently serviced with power and water and locally available, therefore our intention will be to utilise existing services to reduce the use of generators and new connections.

Site Rules (PPE, Speed Limits, Smoking Policy)

Site rules displayed at the entrance and welfare areas: mandatory PPE (hard hat, hi-vis, boots), speed limit of 10 mph, and designated smoking areas. Rules will be communicated during induction. The PC will print signage and brief operatives.

Contractors will be informed of arrangements for smoking on the site.

Traffic flow will be managed by speed limit enforcement.

Manual Handling & COSHH

A manual handling briefing will be given during induction appropriate to the work being undertaken.

COSHH sheets will be available in the site office. There will be an inventory of hazardous substances and lifting requirements.

Fire Safety Plan

PC will put in place fire points with extinguishers and a single assembly point. The Fire procedure will be displayed on notice boards in the welfare facilities. There will be a site layout for assembly point and extinguisher locations.

First Aid Arrangements

There will be a first aid kit in site office and a nominated first aide on site at all times. Emergency numbers will be displayed on the notice boards.

Accident Reporting & RIDDOR Compliance

The PC will maintain a paper-based accident book and verbal reporting to site manager. RIDDOR compliance will be handled reactively.

There will be contact details for HSE on the noticeboards along with reporting thresholds.

Development site layout and welfare arrangements

Because of site constraints, the positioning of welfare accommodation, parking and routes will have to be altered as works progress. Management of these elements throughout the life of the project will be led by the Principal Contractor but will be a collaborative effort between all members of the project team. Welfare facilities will be provided by using a mobile 'EcoSmart' unit. As well as the benefits of being towable and thus moveable around the site as needed, it will incorporate a low noise battery generator and meet sustainability requirements for the development offering:

- Fully insulated wall and roof system with no cold bridging
- LED lighting & hot water without the need for the generator
- Low noise pollution
- Low fuel consumption
- Low CO2 emissions
- Automatic generator timed shut off for unnecessary fuel usage.
- Automatic generators stop/start technology for economical fuel usage

The site layout is available within Appendix A.

The site compound will consist of a single hardstanding area near the main entrance, accommodating welfare units, storage containers, and contractor parking zone. There will be segregation between the vehicles and the pedestrian walkway. The PC will install temporary fencing around the compound and provide basic signage for access points. PC will ensure that are utility connection points for welfare units.

The vehicle entrance will be tarmac at the early stages of the project to assist with reducing vehicle dirt and dust on the highway.

Key points to be covered as well as the safety and health of the delivery team on site will be:

- Mitigation of noise and dust nuisance to nearby residents and wildlife
- Traffic management at the site entrance
- Maintaining a safe access route through the site to ensure construction activities maintain movement and safe access and egress
- Environmental impact management- wheel wash run off, storage of waste

Community Engagement

Communication Strategy

Communication will be essential updates via email and phone calls to key stakeholders. A single point of contact (site manager) will handle all queries. There will be a list of stakeholders and their preferred communication channels. Queries will be promptly responded to as they arise.

Complaints Procedure

All complaints will be logged in a paper-based register and addressed by the site manager within 48 hours. No formal escalation process or trend analysis will be conducted. A complaints logbook will be maintained.

Contact details will be provided to the public for escalation (client or local authority)

Public Liaison & Updates (newsletters, notice boards)

A single notice board will be installed at the site entrance displaying key project information and emergency contacts. Updates will be posted when major changes occur. Information will include basic project milestones and contact details.

Emergency Response Procedures

In the event of an accident requiring emergency services, the Site Manager shall call the emergency services and direct them to the site address. He / She will answer the necessary questions asked by the telephone operator and assist with the instructions requested.

Appointed Person - The Site Manager will be the appointed person responsible for dealing with all emergencies on this contract. In his absence he will nominate another trained person on site to perform his duties.

Environmental Training

Induction Content

Induction will cover essential health and safety rules, PPE requirements, site layout, emergency contacts, and basic environmental controls. Delivered as a short briefing (15–20 minutes) on the first day.

Site layout and access points.

Emergency assembly points and contact details.

Toolbox Talks

Toolbox talks delivered only when issues arise or for high-risk activities.
Topics include basic safety reminders and updates on site rules.

Key hazards and high-risk tasks.

Spill Response Training

Basic spill response covered during induction, with instructions to use spill kits and notify the site manager. No formal drills.

Place spill kits at designated points.

Record Keeping (training logs)

Paper-based training logs maintained in the site office. Updates made manually after inductions and toolbox talks.

Print log sheets and store securely.

Workforce list and subcontractor details.

Implementation, monitoring, and corrective action

The Principal Contractor will be expected to appoint a competent person to conduct regular audits and site inspections to ensure that compliance with the CEMP is being maintained. Their specific role shall be to ensure that nuisance is not caused to surrounding uses. Where non-compliance is identified, the person responsible shall ensure that corrective action is taken.

Inspections shall follow these principles

- Project Manager/ Site Manager will perform informal daily and formal weekly inspections.
- Regular formal inspections and audits are carried out by competent persons and report submitted for consideration by Project Team.
- In the event of an accident / incident or occurrence, there will be a prompt investigation by the Project Team and the required follow up action undertaken and recorded.

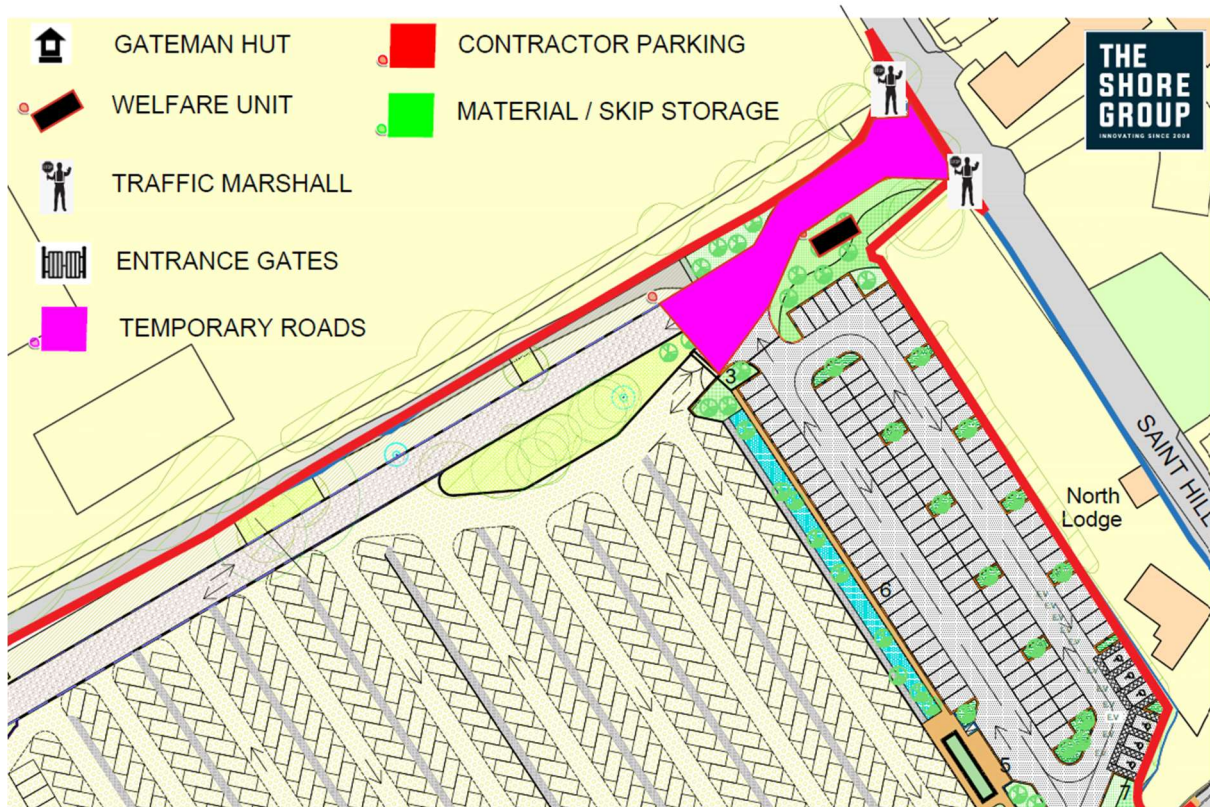
The background features a large, abstract composition. A large, light blue circle is centered on the page, containing the text. To the left of this circle, there are two overlapping geometric shapes: a red triangle pointing towards the top-left and a dark blue triangle pointing towards the bottom-left. To the right of the circle, there is a large, textured, golden-brown shape that resembles a stylized sun or a cross-section of a tree trunk, with concentric circular patterns. The overall design is modern and graphic.

PART 1

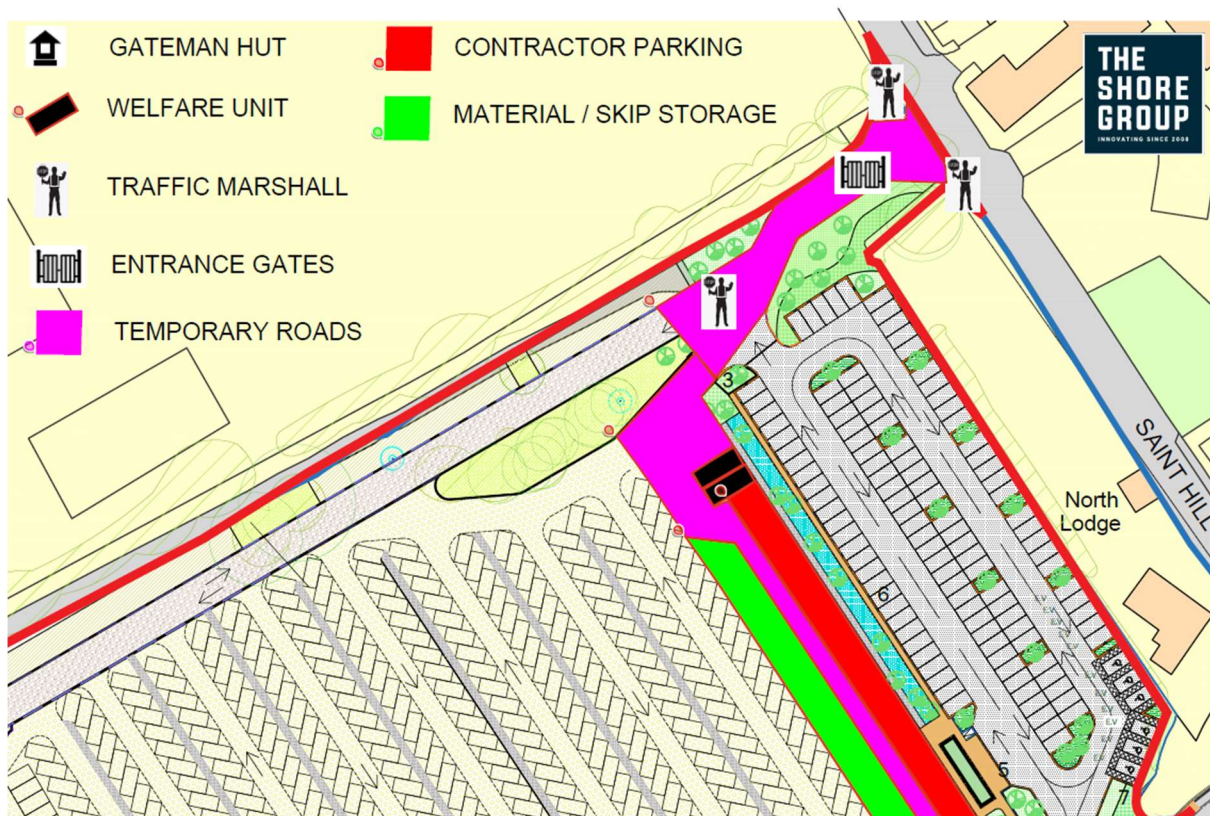
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PRELIMINARIES AND GENERAL CONDITIONS

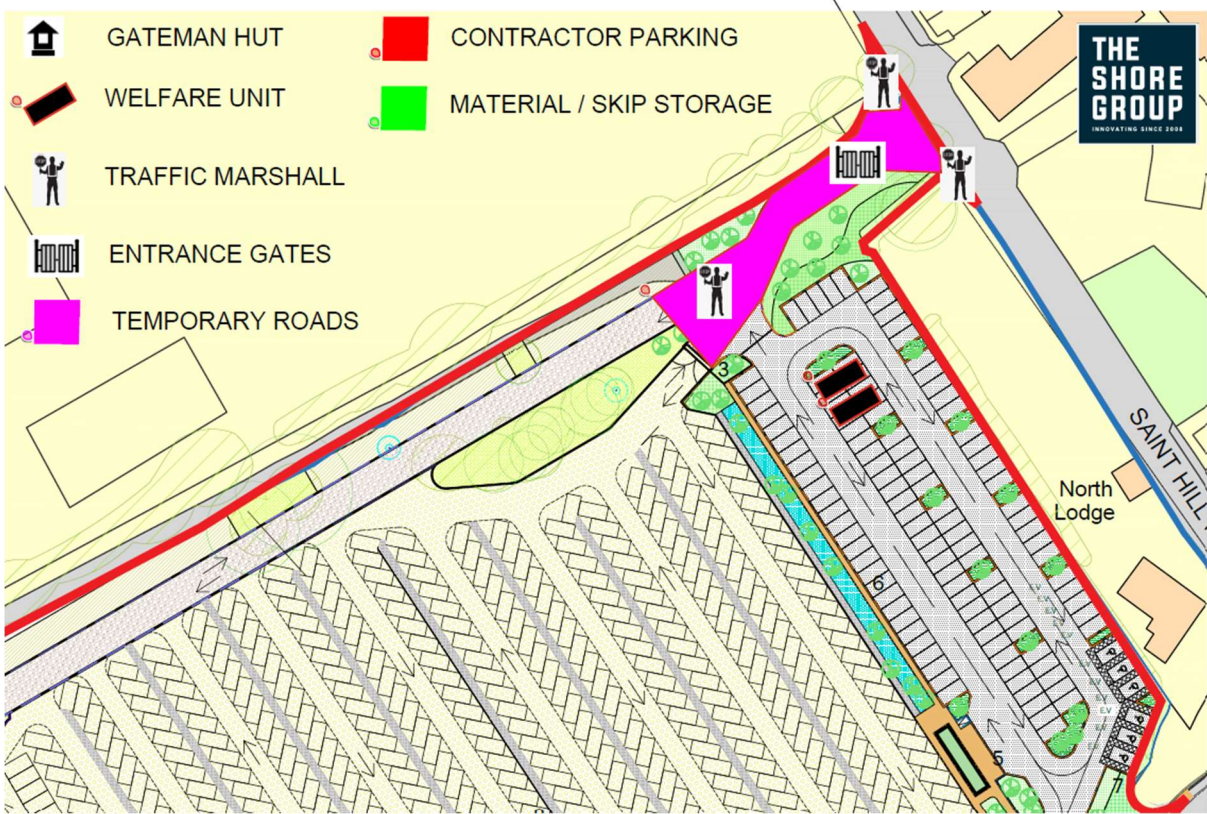
SITE LOGISTICS WEEK 1-3



SITE LOGISTICS WEEK 4-14



SITE LOGISTICS WEEK 15-30





At the core
of surveying
~

SINCE 1938

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~

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W. macconvilles.com

**West Sussex County Council Minerals and Waste team comments dated 25.09.25 and
response from Soil Technics**

**WSSC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority**

TO:	Case Officer: Andrew Watt
DATE:	25/09/2025
LOCATION:	Juhring And Hobbs Field At Saint Hill Manor, Saint Hill Road, East Grinstead, West Sussex
SUBJECT:	DM/25/2223 Hard paved car park with 121 spaces and toilet facilities adjacent to Saint Hill Road. Hard paved access road servicing both Juhring and Hobbs fields. Engineered grass surfaced provision of 619 spaces for temporary parking for specific events in Juhring field. Re-contouring of Hobbs field with grassed surface and provision of permanent pads for a marquee together with washroom facilities and substation with backup generator.
RECOMMENDATION:	☐ Advice ☐ More Information ☐ Objection ☐ Consulted in Error ☐ No Objection ☒ No Objection Subject to:

The application site comprises an area of 5.07ha to the west of Saint Hill Road, within the countryside of East Grinstead. The application site is located within the Brick Clay (Wadhurst Clay) and Building Stone Mineral Safeguarding Area. Policy M9 (b) of the Joint Minerals Local Plan (2018, partial review 2021) states that proposals for non-mineral development within these areas will not be permitted unless:

- (i) *"Mineral sterilisation will not occur; or*
- (ii) *It is appropriate and practicable to extract the mineral prior to the development taking place, having regards to the other policies in this Plan; or*
- (iii) *the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible."*

The applicant has provided a Mineral Safeguarding Assessment (MSA) as part of their application submission. The MSA confirms the presence of the safeguarded mineral resource across the site though the use of BGS geological survey data, and broadly concludes that the prior extraction of the mineral resource across the site would not be feasible owing to the location of the application site within the AONB (National Landscape), proximity to a Listed Building (Grade II), poor connection to the Lorry Route Network and poor anticipated quality of the underlying mineral.

The MSA concludes that, while some pockets of mineral resource around the site may be viable mineral resources in their own right, their prior extraction would not be economically feasible, and the prior extraction of any underlying mineral resource across the wider site would detriment the surrounding landscape character and setting of the proximal listed



building. The anticipated quantity and quality of mineral resource to be sterilised as a result of the development is unknown at this time.

Broadly, the MWPA is minded to agree with the conclusions within the MRA, given the relatively small application site area and nearby protected landscapes/historic assets. That said, with regard to building stone; consideration should be given to the potential usefulness of this resource within the local built landscape or the proposed development itself, and the MWPA would recommend that the LPA contact their Conservation Officer to fully assess the level of weight to afford the safeguarding of this resource (see 2.5 of the MWS [Guidance](#)), especially with regard to the nearby heritage assets. If necessary, the applicant should update the MRA to include an assessment of the quality/quantity of the underlying building stone and identify any potential outcrops that may be suitable for prior extraction. Please reconsult the MWPA as appropriate.

Therefore, the MWPA would offer no objection to the proposed development, subject to the LPA being satisfied that there is an overriding need for the development that outweighs the safeguarding of the mineral resource, as required by Policy M9 (b) (iii).

West Sussex Waste Local Plan (April 2014)

The decision maker should be satisfied that the proposals minimise waste generation, maximise opportunities for re-using and recycling waste, and where necessary include waste management facilities of an appropriate type and scale (Policy W23).

Kind regards,

Edward Anderson (Planner)

Tel.: 0330 2228 879

Email: edward.anderson@westsussex.gov.uk



Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of West Sussex County Council Minerals and Waste team

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today please find below the responses on behalf of the applicants, authored by Soil Technics to the comments made by West Sussex County Council Minerals and Waste team in its consultation response dated 25 September 2025

Soil Technics advise the following:

"The basic purpose of the minerals assessment is to make sure that the development won't 'sterilise' any valuable resources – in this case stone.

Our report says it won't, because it isn't a good place for a quarry and the development isn't going to cover it up irrevocably anyway.

It also says that digging out any stone ahead of the development is not economically viable and would be detrimental to the landscape.

Origin One, 108 High Street, Crawley, West Sussex, RH10 1BD

Direct line 01293 663519 **Email** nigel.abbott@dmhstallard.com **Main line** 01293 605000 **Fax** 01293 246016

Offices in London, Gatwick, Guildford, Brighton, Horsham and Hassocks. Website www.dmhstallard.com

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The Minerals and Waste Planning Authority have said they generally agree with our report.

They have advised that the LPA consult the Conservation Officer to assess how much weight to give the safeguarding of any stone resource for local heritage assets or even this build.

Unless the Conservation Officer decides further investigation to check the quality of the stone onsite is needed, no further action is required."

We would also ask West Sussex County Council Minerals and Waste to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult the West Sussex County Council Minerals and Waste team with these responses.

Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects

**West Sussex Fire & Rescue Service comments dated 15.12.25 and response from
Carnegie Group**

From: FRS Water and Access <FRSWaterandAccess@westsussex.gov.uk>
Sent: 15 December 2025 16:38:03 UTC+00:00
To: "planninginfo" <planninginfo@midsussex.gov.uk>
Subject: Planning consultation - DM/25/2223 Juhring And Hobbs Field At Saint Hill Manor Saint Hill Road East Grinstead West Sussex

FAO: Martin Dale

Dear Martin,

Having viewed the plans for the planning application no DM/25/2223 for the proposed change of use of vacant land to event area with erection of permanent infrastructure to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing on the form of cell pave surfacing for up to 570 car spaces and reinforced ground surfacing to facilitate the erection of the marquee structures, construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, Amended Description, Plans, Documents): the nearest fire hydrant for the supply of water for firefighting is 480 metres away, 390-metres further than the 90-metre distance required for a commercial premises. If an alternative water supply for firefighting is to be considered it will need to conform with the details identified in Approved Document-B (AD-B) Volume 2: B5 section 16 and agreed with West Sussex Fire & Rescue Service.

Evidence will also be required to show Fire Service vehicle access meets with the requirements identified in AD-B Volume 2: B5 Section 15.

Regards
Ian



Ian Stocks

Water & Access Manager - Protection

West Sussex Fire & Rescue Service

Office 0330 222 4499 **Mobile** 07921 291051

Web www.westsussex.gov.uk/fire

Email frs.waterandaccess@westsussex.gov.uk

Bognor Regis Fire Station Fire Station, West Meads Drive, West Sussex, PO19 1BD

My pronouns are he/him/his 

[Click here to find out why we use pronouns in our signatures](#)



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Martin Dale BA (Hons) DIP
Principal Planning Officer
Planning Services
Mid-Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date 27 February 2026
Your ref DM/25/2223
Our ref 1902/417448.1

Dear Martin,

Town and Country Planning Act 1990 (as amended)
Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead
Response to comments of West Sussex Fire and Rescue Service

We refer to the above referenced application for planning permission submitted by Carnegie Group on behalf of the Church of Scientology Religious Education College Inc for the site at Juhring and Hobbs Field at Saint Hill Manor, Saint Hill Road, East Grinstead.

In parallel with the submission of a comprehensive set of documentation to the local planning authority today please find below the responses on behalf of the applicants, authored by Pelham Transport Consulting and Carnegie Group to the comments made by Ian Stocks of the West Sussex Fire and Rescue in its consultation response dated 15 December 2025.

Pelham Transport Consulting has prepared a Transport Assessment Addendum report and within this, the following response is provided in relation to the provision of a fire hydrant:

"A fire hydrant is to be provided at the bottom of Hobbs Field that can be accessed from the existing southern access (North Gate) that is currently used by fire tenders. A fire tender can continue along the access road at the bottom of Hobbs Field and then exit via by continuing on the maintenance route around Hobbs Field to the Juhring Field access. This has a road width of 6m and bends exceed the minimum turning radius stated in AD-B Volume 2: B5 Section 15. A swept path movement is shown in

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Appendix A for a fire tender negotiation the tightest sections at the bottom of Hobbs Field."

The referenced drawing, PTC/CA/45417/14 which shows the Fire Tender Swept Path is also attached.

We also attach Carnegie Group drawing 1093-68 Rev A, Event Field Proposed Fire Hydrant location that shows the location of the proposed fire hydrant to serve Hobbs Field.

We would also ask West Sussex Fire & Rescue Service to note that the description of development for the scheme is to be amended to the following:

"Change of use of vacant land to event area for occasional use with installation of permanent infrastructure and reinforced ground surfacing to facilitate the erection of annual marquee structures including ground level alterations, wash block and toilets, generator enclosure, concrete ring and platforms together with the erection and dismantling of the temporary marquee structure themselves (for a total maximum period of 84 days) and overflow car parking for the Church and neighbouring sports clubs consisting of hard paved surfacing for 113 carparking spaces plus 6 disabled spaces and reinforced ground surfacing in the form of cell pave surfacing for up to 570 car spaces (comprising up to 300 cars for no more than 20 days per year and up to 570 cars on no more than 5 days per year), construction of a new access and internal road, waiting area with structure, sustainable surface water and foul drainage provision, external lighting, associated landscaping and ecological enhancements, (Amended Description, Plans, Documents)"

Can you please reconsult West Sussex Fire and Rescue Service with these responses.

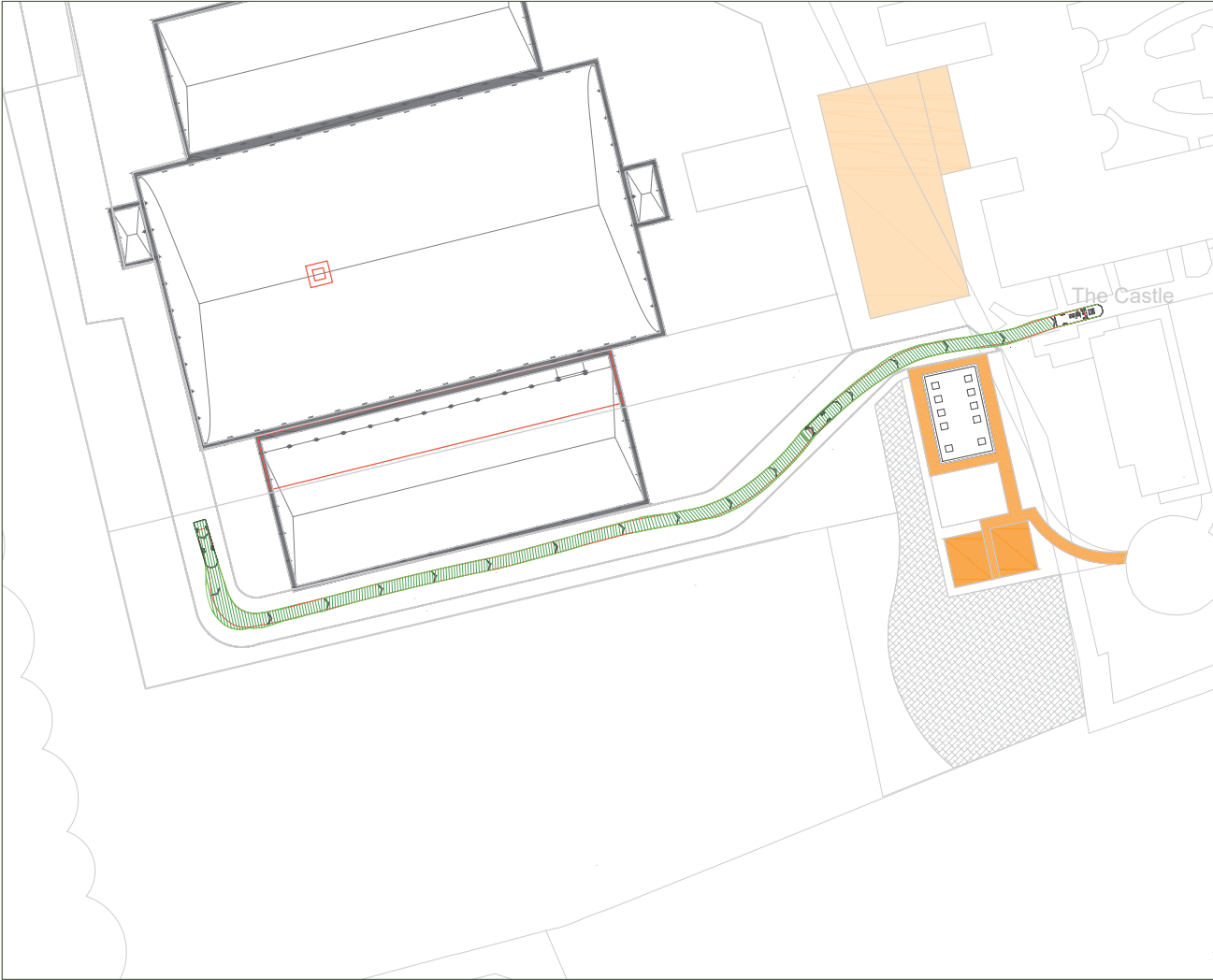
Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

Cc R Thompson Esq – COSRECI
M Cook Esq – Carnegie Architects



0012 Fire Appliance
Overall Length 8.68m
Overall Width 2.45m
Overall Body Height 3.42m
Min Body Clearance 0.55m
Max Use Height 3.74m
Lock to Lock Time 5.00s
Lock to Lock Turning Radius 5.00m

Client Title
Saint Hill Events

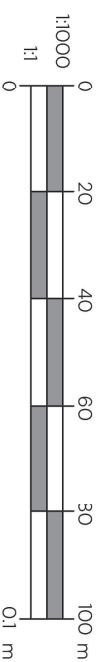
Drawing Title
Saint Hill Road
Fire Tender Swept Path

Originator	Approved	Date	Scale
RP	NTS	25.02.2020	NTS

Drawing No.	Rev.	Sheet No.
PTC/CA/45417/14		

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FOR COMMENT

FH Proposed Fire Hydrant Location



Site plan with Plant enclosure in context. 1:1000



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PROJECT TITLE:

Proposal on Juhring & Hobbs Field, Saint Hill Manor Saint Hill Road, East Grinstead

DRAWING TITLE:

Event Field Proposed
Fire Hydrant location

CLIENT:

COSRECI

DRAWN:

CG

CHECKED:

CG

DATE:

17.12.2025

SCALE:

1:1000 @A3

PROJECT NO:

1093

DRAWING NO:

68

REV:

A

SHEET NO:

1/1