

Re: DM/26/0073 – Land off West Hoathly Road, East Grinstead
Subject: Observations on the High Weald National Landscape Consultation Response

1. Statutory Duties and National Policy Requirements

The HWNL response directly engages:

- **Section 85 of the Countryside and Rights of Way Act 2000**, which places a *legal duty* on public bodies to have regard to the purpose of conserving and enhancing the natural beauty of National Landscapes;
- **NPPF paragraph 189**, which requires *great weight* to be given to conserving and enhancing landscape and scenic beauty; and
- The **High Weald AONB Management Plan**, which is a material consideration.

The Unit concludes that the proposal, as submitted, does **not** conserve or enhance the natural beauty of the High Weald. I appreciate that these statutory and national policy requirements form an essential part of the decision-making framework and must be addressed directly in the officer's assessment.

2. Fundamental Conflicts with the High Weald Housing Design Guide

The HWNL letter identifies extensive **non-compliance** with the High Weald Housing Design Guide, including settlement pattern, street hierarchy, building form, woodland interface, boundary treatments, materials, and lighting.

These appear to be fundamental design issues, rather than matters capable of resolution through minor amendments. The Unit's view that the scheme represents a suburban form inconsistent with the High Weald context is a significant professional judgement.

3. Impacts on Ancient Woodland, Priority Habitats, and Dark Skies

The HWNL response raises concerns regarding:

- insufficient buffers to ancient woodland,
- impacts on priority habitats,
- lighting effects on protected species, and
- loss of dark skies, a defining characteristic of the High Weald.

These points reinforce ecological concerns already present in the application file and appear to be material to the assessment under both national and local policy.

4. Deliverability of the Allocation in a Landscape-Led Manner

The HWNL Unit notes that:

“A significant revised approach to layout is required,” and that *“The proposed density and layout may not be achievable in a landscape-led design.”*

This raises an important question about whether the quantum of development proposed can be delivered in a way that satisfies statutory landscape duties and national policy requirements.

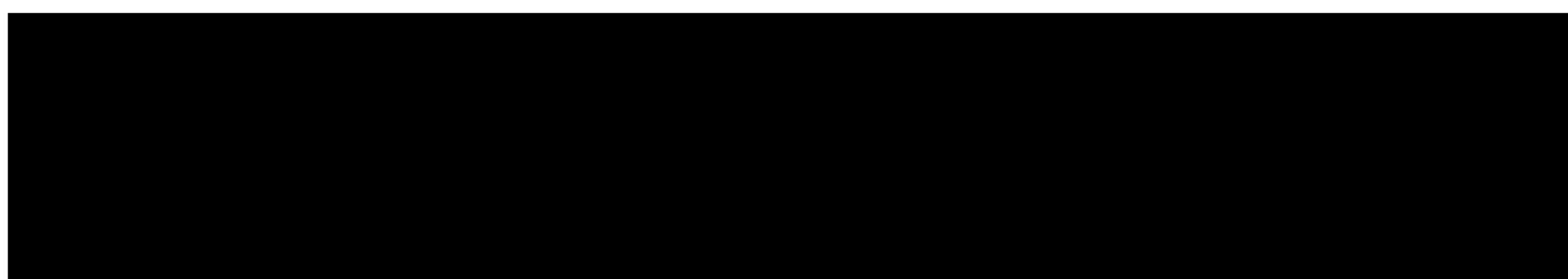
I appreciate that this is a key consideration for the Council in balancing allocation delivery with the legal and policy framework governing National Landscapes.

I understand the pressures on your time and the need to weigh a wide range of evidence. My intention is not to duplicate public comments, but simply to highlight that the HWNL response provides new, authoritative, and materially significant information that was not available during the public consultation period.

Given the statutory duties and national policy tests engaged, I hope that the detailed and technical nature of the HWNL assessment will be given the great weight required by law and policy.

Thank you for your consideration of the points listed.

Yours sincerely,

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