



Planning Statement

Juhring and Hobbs field, Saint Hill Road, East Grinstead

February 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 discussed with Ann Biggs 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 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)”

It is accepted that it could perhaps have been reasonable to take the view that the originally submitted scheme with no explicit limit on the days of use of the marquee/event area or car parking, that the proposal was ‘major’. However, with the limited use now set out in relation to both parking and the marquee, it is our view that the application does not fall to be considered ‘major’.

Accordingly in our judgement the scheme does not constitute major development in the National Landscape and therefore the proposals are compliant with Policy DP16 of the Mid Sussex District Plan which supports small scale proposals that support the economy and well-being of the National Landscape and are compatible with the conservation and enhancement of natural beauty. This should be given significant weight.

Were this judgement to be disputed and the view taken that the scheme should be considered as being a major development then we consider that we demonstrate 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, well 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 reviewed the various replies from statutory and other consultees and, having also discussed matters with officers, now wish to make further 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
 - Revised application form given the change to the proposed description of development.
 - Updated Design and Access Statement prepared by the Carnegie Group
 - 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 A key issue that has emerged is the impression that many appear to have, that the proposals seek to use the 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 entire 570 space temporary car

park for a total of up to 5 days in any calendar year, most particularly during the International Association of Scientologists event 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. We have emboldened the text to show clearly how the description of development is changed:

*"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)"*

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, 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 hard surfaced car park accommodating 113 car parking spaces plus 6 disabled spaces for permanent, year round use including access road into this 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 Cell Pave 50 under Juhring field to provide a solid base to allow temporary parking for a maximum of 28 days in any calendar year with use of up to 300 spaces for a maximum of 20 days and use by the maximum 570 cars for no more 5 days in any calendar year. The overflow part of the field is only used for parking 14 days a year, with only 2 days being entirely filled. The only reason we are asking for 25 days is to ensure we do not need to come back to MSDC.
 5. The erection of a waiting area building located on the south-western edge of the proposed hard surfaced car park (marked as 8 on Site Plan drawing 1093 060 Rev M), the erection of a generator enclosure (marked as 9 on Site Plan drawing 1093 060 Rev M) and Washroom building (marked as 10 on Site Plan drawing 1093 060 Rev M).
- 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 340 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.

Importantly the policy goes on to state that small scale proposals which support the economy and social well-being of the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.

Consideration of Major Development

- 3.15 In 2011 the South Downs National Park Authority sought legal advice on the meaning of ‘major development’ as used in paragraph 22 of the PPS7 (since replaced by the National Planning Policy Framework). The advice concluded that the definition of ‘major development’ contained within the Town and Country Planning (Development Management Procedure) (England) Order 2010 (consolidated by Order 2015) was not applicable to paragraph 22 of PPS7 but may be useful to apply as part of a criteria-based approach. Under the Town and Country Planning (Development Management Procedure) (England) Order 2010 (now the 2015 Order) the development would be considered as a ‘major development’ due to it being a ‘non-residential development on a site over 1 hectare (ha) in size’. However, in our view the proposal should not be considered “major development” on these grounds alone.
- 3.16 For the reasons set out above the proposed development is not automatically considered a ‘major development’.
- 3.17 The NPPF does not provide a definition for major development in AONBs, however, there are a number of sources that can be drawn upon to provide some guidelines for determining whether a proposed development is major development.
- 3.18 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.
- 3.19 The South Downs National Park Authority has sought legal advice on the matter of major development and has published as part of the evidence for its Local Plan what has become known as the ‘Maurici opinions’ – that is, legal advice provided in 2011 and 2014 by James Maurici QC, and then subsequent legal advice provided by Toby Fisher in 2017.
- 3.20 The Maurici opinions (**Appendix 1**) provide a useful analysis of major development and set out a series of principles (derived from caselaw, guidance and appeal decisions) to be applied by decision makers when determining whether a proposed development could be regarded as major development:
- It is a matter of planning judgement to be decided by the decision maker.
 - Major development is to be given its ordinary meaning, and it would be wrong to apply the definition of major development contained within the Town and Country Planning (Development Management Procedure) (England) Order 2015. It would also be wrong to apply any set or rigid criteria for defining major development, and the definition should not be

restricted to development proposals that raise issues of national significance.

- The decision maker may consider whether the proposed development has the potential to cause a significant adverse impact on the purposes for which the area has been designated or defined, rather than whether there will indeed be a significant adverse impact from the proposed development.
- The decision maker may consider the proposed development in its local context as a matter of planning judgement.
- There may be other considerations but which may not determine whether a proposed development is major development. For example, if the proposed development is Environmental Impact Assessment (EIA) development.
- The ordinary sense of the word 'major' is important and the decision maker should take a common sense view as to whether the proposed development could be considered major development.

3.21 In Mr Fisher's 2017 legal opinion, he was of the view that: '*... it would arguably amount to an error of law to fail to consider paragraph [177] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF.*'

3.22 The assessment as to whether a development is 'major' is therefore, a matter of planning judgement to be decided by the decision maker and needs to take into account the common sense meaning of the word 'major' and the local context.

3.23 With this background in mind consideration needs to be given in relation to the revised application as submitted. It could perhaps have been reasonable to take the view that the originally submitted scheme with no explicit limit on the days of use of the marquee/event area or car parking, that the proposal was 'major'. However, with the limited use now set out in relation to both parking and the marquee, it is our view that the application does not fall to be considered 'major'.

3.24 We accept that the development project is 'major' for the purposes of the Town and Country Planning (Development Management Procedure) (England) Order 2010 i.e. it is 'non-residential development on a site over 1ha in size'.

3.25 However, the following bullet points provide a wealth of reasons why the proposal would not result in a significant adverse effect on the natural beauty of the NL.

- The temporary marquee would be erected for a maximum of 84 days per year – it is not a permanent feature.
- The development proposal will create a biodiversity net gain of 60%.

- The development proposal results in very limited above ground infrastructure (toilets & waiting room).
 - Ground level parking is primarily cell pave with grass able to grow year round making the area assimilate into the landscape.
 - The parking areas (other than an area of hard surfaced parking) is limited to being used 25 days per year.
 - The site is not prominent in Landscape terms.
 - The EIA Screening Opinion considers that the project is not an EIA development, which means it is not likely to give rise to significant environmental effects.
- 3.26 We would draw attention to the LPA's own guidance (**Appendix 2**) which sets out how the Council have considered the issue of Major development in relation to the allocation of sites through the District Plan. We would also make reference to a number of applications for residential development where the Council have determined that the schemes were not 'major', specifically:
- 45 dwellings - Land off West Hoathly Way, East Grinstead
 - 35 dwellings - Land West of Selsfield Road Ardingly – in this case the Committee report states that: *'This matter was considered within the Sites Allocation DPD Inspector's Report it sets out: 'I am therefore satisfied that, in the Mid Sussex context, subject to MM1, which reduces the housing quantum of SA25, from 70 to 35 dwellings within a settlement that is in the AONB, that all the housing allocations in the submitted Plan comply with the requirements of District Plan policy DP16, in that they are all modest (minor) schemes which do not cause harm to the AONB.'* The Inspector took the view that this would be a minor development and not a major development and as such does not need to be assessed against Paragraph 177 of the NPPF.
- 3.27 Therefore, it is our firm view that the current application is not major development for the reasons outlined above, however it is the purview of the decision maker to come to the conclusion as to whether the application is major or not, and the exercise above has been produced to help in the assessment process.
- 3.28 Should however the Planning Authority come to a different view, then we say that there are exceptional circumstances, and it can be demonstrated that the development is in the public interest. 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 possibility that the event would move

to the USA if this permission were to be refused) and 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 revised, limits the use to a temporary period with minimal above ground permanent development and consequently limited landscape harm).

- 3.29** 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”.
- 3.30** 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.
- 3.31** 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.
- 3.32** 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 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).
- 3.33** 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.

4. Responses to queries and consultee comments

- 4.1** We are aware that a request for various clarifications and additional information was issued by email dated 29 October 2025. Whilst many of these points were addressed by the revisions that were made and added to the on-line planning register on 2 December 2025, we have nevertheless included responses to all queries in **Appendix 3** to this Planning Statement.

- 4.2 Furthermore the applicants acknowledge that there have been a number of comments submitted by consultees to the application proposals and as agreed with officers, we have prepared responses to each of these. The original responses from consultees and the respective replies to these are contained in **Appendices 4 to 15** as follows:

Appendix 4 - MSDC Conservation Officer comments dated 17.10.25 and WS Heritage response.

Appendix 5 - MSDC Tree Officer comments dated 29.01.26 and response from PJC Consultancy

Appendix 6 - High Weald Joint Advisory Committee comments dated 09.02.26 and response from Enplan

Appendix 7 - West Sussex County Council Highways Authority comments dated 02.02.26 and Pelham Transport Consulting Response

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Appendix 14 - West Sussex County Council Minerals and Waste team comments dated 25.09.25 and response from Soil Technics

Appendix 15 - 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 As has been elucidated above, it could perhaps have been reasonable to take the view that the originally submitted scheme with no explicit limit on the days of use of the marquee/event area or car parking, that the proposal was 'major'. However, with the limited use now set out in relation to both parking and the marquee, it is our view that the application does not fall to be considered 'major'
- 5.3 Accordingly in our judgement for the reasons set out in paragraph 3.25 of this Planning Statement, the scheme does not constitute major development in the National Landscape and therefore the proposals are compliant with Policy DP16 of the Mid Sussex District Plan which supports small scale proposals that support the economy and well-being of the National Landscape and are compatible with the conservation and enhancement of natural beauty. This should be given significant weight.
- 5.4 Were this judgement to be disputed and the view taken that the scheme should be considered as being a major development then for the reasons set out in paragraph 3.28 set out above, we consider that we demonstrate exceptional circumstances sufficient to pass the test in paragraph 190 of the NPPF.
- 5.5 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".
- 5.6 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.
- 5.7 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.
- 5.8 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).

- 5.9 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.
- 5.10 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.
- 5.11 Accordingly, we consider that planning permission should be granted for the proposed development.



Appendix 1

**Legal Opinion of James Maurici in the matter of the South Downs National Park
Authority and in the matter of paragraph 22 of PPS7.**

IN THE MATTER OF THE SOUTH DOWNS NATIONAL PARK AUTHORITY
AND IN THE MATTER OF PARAGRAPH 22 OF PPS7

OPINION

Introduction

1. I am asked to advise the South Downs National Park Authority (“SDNPA”) on the meaning of “major development” as used in paragraph 22 of PPS7.

2. PPS7 states:

“22. Major developments should not take place in these designated areas [National Parks, the Broads, and AONBs], except in exceptional circumstances. This policy includes major development proposals that raise issues of national significance. Because of the serious impact that major developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination. Major development proposals should be demonstrated to be in the public interest before being allowed to proceed. Consideration of such applications should therefore include an assessment of:

(i) 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;

(ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

(iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

23. Planning authorities should ensure that any planning permission granted for major developments in these designated areas should be carried out to high environmental standards through the application of appropriate conditions where necessary.

3. In light of that paragraph, it is important for a National Park Authority (“NPA”) to be able to identify an application for “major development”. However, there is no definition of “major development” in either PPS7 or the government circular on English National Parks and the Broads¹ and there is no case-law I am aware of on the point.

¹ The English National Parks and Broads UK Government Vision and Circular 2010, and which replaces Circular 12/96. This says:

“Major development in or adjacent to the boundary of a Park can have a significant impact on the qualities for which they were designated. Government planning policy towards the Parks is that major development should not take place within a Park except in exceptional circumstances. This is set out in Planning Policy Statement 7: Sustainable Development in Rural Areas and

4. On 1st August 2009 and on 27th April 2010, prior to the SDNPA becoming operational, I advised DEFRA and the SDNPA on the principles that ought to be applied when deciding whether to delegate planning decisions. I advised that decisions on “major development” ought not to be delegated. In so advising, I adopted the definition of “major development” as set out in the Town and Country Planning (General Development Procedure) Order 1995 (“the 1995 Order”), see e.g. the opinion dated 1st August 2009 at para. 27ff.
5. As the SDNPA is now exercising its planning powers, it must adopt a sound and consistent approach to assessing whether an application is for “major development”. Accordingly, I am asked to confirm whether the term “major development” as found in PPS7 has the same meaning as “major development” in the 1995 Order (since replaced in identical terms by the Town and Country Planning (Development Management Procedure)(England) Order 1995/419 (“the 2010 Order”)), or whether it has a different meaning.

Discussion

i) The 2010 Order

6. The only legislative definition of “major development” is found in the Article 2 of the 2010 Order, which provides:

“major development” means development involving any one or more of the following—
(a) the winning and working of minerals or the use of land for mineral-working deposits;
(b) waste development;
(c) the provision of dwellinghouses where —
(i) the number of dwellinghouses to be provided is 10 or more; or
(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
(e) development carried out on a site having an area of 1 hectare or more”

restated in Minerals Policy Statement 1: Planning and Minerals. Applications for all major developments should be subject to the most rigorous examination and proposals should be demonstrated to be in the public interest before being allowed to proceed. The criteria for the assessment of such applications is currently set out in Paragraph 14 of Minerals Policy Statement 1 and Paragraph 22 of Planning Policy Statement 7. The Government expects all public authorities with responsibility for the regulation of development in the Parks to apply the test rigorously, liaising together to ensure that it is well understood by developers.”

7. The 2010 Order repealed and replaced the Town and Country Planning the 1995 Order”. The definition of “major development” in Article 8(7) of the 1995 Order was identical to the definition in the 2010 Order.
8. There can be no doubt that the definition of the term “major development” in the 2010 Order does not apply directly to its use in paragraph 22 of PPS7. Article 2(1) of the 2010 Order begins: “In this Order, unless the context otherwise requires-” (emphasis added). Accordingly, the definitions in the Order are expressly stated to apply only to the Order itself. Similarly, Article 8(7) of the 1995 Order commenced: “In this Article...” Further PPS7 makes no reference to the definitions contained in the 1995 or 2010 Orders.
9. As such, the term “major development” in PPS7 is not defined in the 2010 Order. But that does not mean that the term ought not to be construed in line with the definition used in that Order.
10. *Prima facie*, there are reasonable grounds for arguing that the term as used in PPS7 ought to be construed in line with its use in the 1995 and 2010 Orders. Those arguments include:
 - (1) First, the writers of PPS7 (published in 2004) can be assumed to have known the definition of “major development” set out in the 1995 Order. That is a definition familiar to most people involved with the planning system. It is unusual that a principle as important as “major development” would go undefined in a national policy document and that may suggest that the drafters of PPS7 thought the definition was clearly defined in the 1995 Order.
 - (2) Secondly, both the 2010 Order and PPS7 use the phrase for a planning purpose, in order to identify development that is of some significance in planning terms. The 1995 and 2010 Orders identify “major development” by its type (eg minerals and waste development) and size (eg buildings over 1000 square metres). That criteria serves the purpose of paragraph 22 of PPS7 in identifying those developments which may have a serious impact on an area of natural beauty.

11. However, there are obvious difficulties with those arguments. Paragraph 22 of PPS7 does not refer to the definition in the 1995 Order. It would have been open to the drafters of PPS7 to have done so. Further, the purpose of identifying major applications in the 1995 and 2010 Orders is different to the purpose of identifying them in PPS7. In PPS7, the purpose of identifying “major development” is to identify that development which may have a serious impact on an area of natural beauty. In the 1995 and 2010 Orders, the provisions referring to “major development” set down stricter requirements for publicity of planning applications (Article 13) and longer time limits for determination of those applications (Article 29). As such, the purpose is to identify those applications that ought to have a more rigorous consultation process, and more careful consideration. While there may be an overlap of the purposes of the two provisions, paragraph 22 of PPS7 and Articles 13 and 29 of the 2010 Order are seeking to identify “major developments” for different reasons.

12. Accordingly, on reflection, I do not consider that the definition of “major development” in the 2010 Order provides a complete answer to the meaning of “major development” in paragraph 22 of PPS7.

ii) The approaches adopted by other NPAs

13. There is a diversity of approach amongst other NPAs, who appear to adopt one of the following different definitions of “major development”:

(i) The definition in the 2010 Order

14. The Peak District is known to adopt the definition in the 2010 Order. Although neither the Local Plan nor the Submission Core Strategy contain any definition of “major development”, instructing solicitors understand that, as a matter of practice, the Peak District NPA applies the definition in the 2010 Order when identifying applications for “major development”.

15. Similarly, the Broads Authority is known to adopt the definition in the 2010 Order. Although the Core Strategy does not contain a definition of “major development”,

instructing solicitors understand that, as a matter of practice, the Broads Authority applies the definition in the 2010 Order when identifying applications for “major development”.

(ii) A different definition based on “adverse impact”

16. Some NPAs have defined “major development” in relation to the adverse impact of the proposed development on the qualities of the National Park.

17. The Lake District Core Strategy defines “major development” as follows (Policy CS12):

“Major development is defined as development which is more than local in character and which has a significant adverse impact on the special qualities of the National Park.”

18. The explanatory text states:

“4.10.2 Examples of major development proposals include road schemes, pipelines, energy supply schemes (conventional, nuclear or large scale renewable), water supply schemes, large scale tourism or leisure schemes, major mineral workings or proposals for major new waste disposal or management facilities (including those for nuclear waste). However, it is not just the major development itself which may impact on the National Park. For example, upgrades to the electricity distribution network or transport network may be required as a result of the proposals for new nuclear power stations or facilities for the disposal of radioactive waste in West Cumbria. Although the facilities themselves may be outside the National Park, these proposals could still have significant environmental effects if the infrastructure associated with them passes through the National Park. We will therefore assess relevant proposals for infrastructure associated with major developments under this policy.”

19. The Exmoor National Park Local Plan does not expressly define “major development”, but also appears to prefer a definition that focuses on the adverse impact of the development proposed. The Local Plan includes the following supporting text in relation to its “major development” policy (Policy LNC20):

“Certain development proposals will have such a significant impact on the landscape, due to their size, nature or traffic implications, that they cannot be accommodated without being in direct conflict with National Park purposes...

...

2.141 The following policy applies to all development proposals which the National Park Authority considers would have such a major or intrusive impact on the landscape, wildlife, cultural heritage, public enjoyment and community of Exmoor as to be incompatible with the statutory National Park purposes. Applications for all such development will be subject to the most rigorous examination.”

20. The Yorkshire Dales Local Plan defines “major development” as follows (supporting text to Policy GP5):

“3.25 Major development is defined as development of more than local significance which will also have a long-term impact on the landscape, wildlife or cultural heritage of the National Park, because of its scale and nature. Examples include proposals for large road schemes, energy-generating schemes, water storage reservoirs etc.”

(iii) A different definition based on possible effects

21. In Wales, the Brecon Beacons Authority has adopted a flexible approach which defines “major development” in relation to its potential to cause adverse effects. In the glossary of terms in the Authority’s LDP 2007 – 2023, it states:

“The National Park Authority is likely to regard the following forms of development as ‘Major Development’:

- development requiring an Environmental Impact Assessment,
- development not qualifying for an assessment listed above but when assessed against the screening criteria set out under Schedule 3 of the Town and Country Planning (EIA) (England and Wales) Regulations 1999 - SI 1999 No. 293 a significant adverse environmental impact is suspected,
- development justifying the need to submit an appraisal/ assessment of the likely traffic, health, retail implications of the proposal.

Exceptionally, there may be other triggers that necessitate an assessment being carried out. Such an assessment would also need to refer to any associated developments, including access roads and other ancillary buildings. This will be in addition to any assessment required by current legislation, policy or guidance.”

22. As such, the criteria against which development is evaluated by the Brecon Beacons NPA does not depend on the actual impact of the development, but on the fact that the development is of such a scale, character or nature that an assessment of that impact is likely to be required under the planning regime (in the form of EIA, transport, health or retail impact assessments). Therefore, the criteria are concerned with the potential impact of the development rather than the actual impact.

23. Additionally, the approach adopted by the Brecon Beacons NPA is criteria-based but not dictated by criteria. Discretion is still required by the decision maker when deciding whether the development is “major development”.

(iv) Uncertain definition

24. The North York Moors Core Strategy does not provide a definition of “major development”, and instead offers examples of what might qualify as “major development”. It states at para. 5.3:

“There is no precise definition of ‘major development’ but an indication that it includes proposals raising issues of national significance. The guidance indicates that major development should only take place in exceptional circumstances and where it can be shown to be in the public interest. Examples of development that might be classed as major include mineral workings, waste disposal facilities, larger energy generating schemes, water storage reservoirs, high voltage electricity transmission schemes, large scale military development and larger road schemes.”

25. The Dartmoor National Park Core Strategy appears to adopt a hybrid definition, which incorporates some elements of the definition in the 2010 Order, but appears to limit the PPS7 meaning to large scale works for national needs. The Core Strategy states at para. 4.3:

“Major development in National Parks - development that raises issues of national significance - is also addressed by PPS7.”

26. In its Glossary of Terms the Core Strategy states:

Major development

The Department for Communities and Local Government uses the following definition for monitoring purposes:

- for dwellings: 10 or more houses to be constructed (or if the number is not given, the area is more than 0.5ha).

- for all other uses: where the floorspace will be 1000sq m or more (or site is 1ha or more). The area of a site is that directly involved in some aspect of the development. Floorspace is defined as the sum of the floor area within the building.

There is reference to ‘major development’ in PPS7 (Sustainable Development in Rural Areas) and tests to determine the exceptional circumstances within which this form of development will be permitted in National Parks are set out. This type of major development relates to large scale works for national needs, e.g. trunk road schemes, power stations, reservoirs.”

27. The New Forest National Park Core Strategy provides no assistance on the definition of “major development”.

iii) Secretary of State and Inspectorate decisions

28. The definition of “major development” in the context of paragraph 22 of PPS7 has been considered in a number of Secretary of State’s and Inspectorate decisions.

29. In an appeal by Leda Properties Limited in respect of land at Aston Down (APP/C1625/A/07/2055526) (1st December 2009), the Secretary of State agreed with his Inspector’s approach in concluding that a proposed development in an AONB was “major development”. At the inquiry, the Appellants had argued that “major development” was to be defined by the effects of the development on an

AONB. They argued that where no adverse effect could be shown, then a development would not be “major development” irrespective of its size. In response, Stroud District Council argued that “major development” was defined by its potential, rather than actual impact. It relied on the relevant policy in the Gloucestershire Structure Plan (NHE4) which defined “major development” as follows:

“The definition of ‘major development’ is affected by issues such as location, scale, context and design. ‘Major’ cannot be quantified or determined at the strategic level in this context. However, potential impact can be judged against the local characteristics of a particular proposed site through the local plan process, thereby allowing for the local interpretation of ‘major’ and so ensuring the retention of qualities of local distinctiveness within the AONB.”

30. The council then argued that, when assessed against other policies, the site was “a major strategic site”, exceeded the threshold for “strategic employment site”, exceeded the threshold for EIA development, and exceeded the threshold requiring a Transport Assessment. On any assessment, the council argued that this was “major development” for the purposes of paragraph 22 of PPS7.

31. Addressing the competing arguments, the Inspector concluded:

“9.6 PPS7 does not define major development but requires that such proposals should be the subject of the most rigorous examination. Paragraph 14.2.22 of the GSP implies that what is “major” depends upon details such as the characteristics of a particular site, so that only after considering the impacts of a particular project at a known site would its status as major be known. However this text is not repeated in the SDLP, which corresponds more closely to the form of PPS7 as it has been from 2004, rather than the earlier version which would have influenced the GSP.

9.7 The Councils have pointed out the scale of the development in terms of floorspace, car parking, and traffic generation and provided several illustrations of thresholds for policy and assessment purposes, all of which would embrace the appeal scheme, in some cases by a very substantial margin. In my view both the appeal scheme and the Main Site alternative should be regarded as major development in the terms of PPS7, without relying upon a detailed assessment of their effects at this location. To take a different approach would preclude the rigorous examination which the guidance specifies should be carried out if development is “major”. Similarly, to determine otherwise in applying policy would undermine the objective of paragraph 23 of PPS7 to achieve high environmental standards where such development is permitted by imposing appropriate conditions. The need for such conditions must arise from the potential impacts of a major proposal, even though its actual impacts may be shown to be acceptable. For these reasons I do not for this purpose accept Leda's argument that the appeal scheme is not a major development because it would not have a serious impact on the AONB.”

32. As such, the Secretary of State agreed with an approach which: i) focused on a broad assessment of potential impacts rather than carefully assessed actual impacts, and ii) considered it relevant that a proposed development exceeded other relevant planning thresholds, such as those where an EIA or Transport Assessment was required, or above which a site would be considered “strategic”.

33. In an appeal by Glyndebourne Productions Ltd in respect of land at Mill Plain, Glyndebourne (APP/P1425/V/07/1201896) (10th July 2008), the Secretary of State agreed with his Inspector's reasoning in finding that a proposed wind farm development was not "major development" in an AONB for the purposes of paragraph 22 of PPS7. The Inspector said:

"139... Conflicting views were expressed at the inquiry as to whether the proposed development should be considered to fall within the terms of these provisions [para.22 of PPS7].

140. I agree with the applicant that there is a palpable link between the provisions of paragraph 22 of PPS7 and the contents of paragraph 12 of PPS22. The latter charges regional planning bodies and local planning authorities to list criteria which set out the circumstances in which particular types and sizes of renewable energy projects will be acceptable in nationally designated areas. It goes on to record that small-scale developments should be permitted within such areas provided there is no significant environmental detriment to the area concerned... the issue is specifically considered in RPG9... Paragraph 10.77 states that wind and other renewable energy projects should not be precluded in AONBs as there will be locations where small scale construction can be accommodated in which any conflict with the purposes of landscape protection can be avoided... The same paragraph gives an example of a small scale scheme – a wind development of between one and four turbines not generating more than 5MW.

141... The application falls well within the terms of the illustration and it follows that I also conclude the case is not one which needs to be considered against the contents of paragraph 22 of PPS7."

34. As such, the Secretary of State agreed with an approach which defined "major development" by reference to local circumstances and by reference to compliance with other policies applicable to the area.

35. In addition to these Secretary of State decisions, there are a number of Inspectorate decisions that are relevant:

(1) In an appeal by Castle Combe Circuit Ltd (APP/J3910/A/04/1163626) (24th November 2005), the Inspector rejected the submission that "major development" ought to be construed in line with the definition in the 1995 Order, and instead assessed the potential impacts of the development and local circumstances;

(2) In an appeal by Winchester Marine Ltd (APP/N2535/C/08/2085832) (5th May 2009), the Inspector noted that many Councils used the definition from the 1995 Order to define "major development" in paragraph 22 of PPS7. However, the Inspector rejected this approach, stating that "PPS7 does not necessarily intend to defined 'major development' in the same terms as the GDPO... Therefore I consider there could be scope to interpret what is

meant by major in PPS7 in the light of local circumstances and particular proposals”. He then held that although a change of use could amount to a major development, the alleged change of use was not within the category of “major” developments on account of its “extent and character”.

(3) In an appeal by Havenstreet Cricket Club (APP/P2114/A/09/2100514) (29th September 2009), the Inspector applied the 1995 Order definition to “major development” in paragraph 22 of PPS7.

(4) In an appeal by Rydon Homes (APP/D3830/A/10/2132146) (9th December 2010), the Inspector expressly rejected the approach taken in the Havenstreet appeal and found that the definition in the 1995 Order did not apply to paragraph 22 of PPS7. The Inspector found that paragraph 22 of PPS7 only applies to developments that raise issues of national significance.

(5) In an appeal by Netherwater Environmental Ltd (APP/M9496/C/08/2084432) (26th October 2010), the Inspector said:

“An assessment as to whether development falls within the definition of major does not revolve around whether it is harmful or not; that is more appropriate to an assessment as to whether planning permission should be granted for it. As a matter of fact and degree and having regard to the scale of the operations envisaged over an eight year period, I conclude that the proposal comprises major development, a conclusion also reached by the assessor”

36. Although there is some variation in approach, the following principles can be drawn from the decisions:

- (1) In general, “major development” in PPS7 is not interpreted in line with the definition in the 2010 Order;
- (2) The definition of “major development” is based on whether, *prima facie*, the development might potentially have adverse impacts on a National Park or AONB, rather than whether, after a careful and close assessment, it will have such adverse impacts;
- (3) It will be relevant to consider whether the development exceeds other relevant planning thresholds, and whether the development complies with other relevant planning policy.

Analysis

37. Before I express my view on what I consider to be the correct interpretation of “major development” in PPS7, I will briefly set out what I consider to be the incorrect approaches.

(1) First, I do not consider that “major development” is limited to development which is of national importance or significance. That approach was suggested by the Rydon Homes decision, and is to some extent adopted by the Lake District and Dartmoor NPAs in their policies. I do not consider this to be a correct interpretation of paragraph 22 of PPS7. That paragraph says that the policy “includes major development proposals that raise issues of national significance” (emphasis added). In my opinion, that does not limit the policy to such proposals. As such, I consider the local, or regional, or national significance of a proposal is irrelevant to whether it amounts to a “major development” for the purposes of paragraph 22 of PPS7.

(2) Secondly, I do not consider that the definition of “major development” is dependent on whether the proposal will in fact have a significant adverse impact on a National Park or an AONB. Paragraph 22 of PPS7 states: “Because of the serious impact that major developments may have on these areas of natural beauty, and taking into account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination” (emphasis added). As such, part of the examination of an application for a major development is the extent to which the development causes a detrimental effect on the environment, the landscape and recreational opportunities (see paragraph 22(iii) of PPS7). But the assessment of the impact of a major development comes after it has been identified as a major development; it is not part of the definition. As such, I agree with the approach taken in the Leda Properties and Netherwater appeals, and consider that the approach adopted by the Lake District and Exmoor NPAs in defining “major development” by reference to its adverse impact on the National Park is not to be recommended.

38. In my opinion, the correct approach to identifying a “major development” for the purposes of paragraph 22 of PPS7 is as follows:

- (1) The definition of “major development” in the 2010 Order is not the definition for the term as used in paragraph 22 of PPS7.
- (2) Major development, for the purposes of paragraph 22 of PPS7 is any development which, by reason of its scale, character or nature, has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by a National Park or AONB. That does not require an in-depth consideration of whether the development will have such an impact. Instead, it requires a prima facie assessment of the potential for such impact.
- (3) Assessing whether a proposed development is a “major development” is a matter of judgment based on all the circumstances. It is not a matter that can be determined by criteria alone.
- (4) However, criteria *may* be used to raise a presumption that a development is a “major development”. That criteria might include:
 - i. The development is EIA development. EIA development is development likely to have significant environmental effects and is therefore an appropriate criterion to apply in this context;
 - ii. The development falls within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 (as amended) (those developments falling within Schedule 2 have the potential to have significant environmental effects and therefore this is an appropriate criterion to apply in this context);
 - iii. The development is “major development” for the purposes of the 2010 Order (even though the definition in the 2010 Order does not apply directly to paragraph 22 of PPS7, the criteria set out in that definition is a useful starting point to identify development of a size, character or nature that may have a significant adverse impact on the National Park);

iv. The development requires the submission of an appraisal/ assessment of the likely traffic, health, retail implications of the proposal. The application of this kind of criteria appears to be supported by the Secretary of State's decision in the Leda Properties appeal.

(5) If the criteria above are met, the NPA must consider whether there is anything to rebut the presumption that the development is major development. Local circumstances, the particular facts of the application, and other applicable planning policies must be taken into account before coming to a view on whether the development, by reason of its scale, character or nature, has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by a National Park or AONB.

(6) There may also be circumstances in which an application which does not raise a presumption that it is a "major development" may nonetheless be properly regarded as a "major development" when all the circumstances are considered.

39. Instructing solicitors will note that, of the approaches adopted by other NPAs, I consider that the policy adopted by the Brecon Beacons NPA most closely matches my view of the correct approach.

Conclusions

40. For the reasons set out above, I do not consider that the definition of "major development" in the 2010 Order is applicable to the term "major development" in paragraph 22 of PPS7. However, as explained above, the criteria set out in the definition in the 2010 Order may be useful to apply as a part of a criteria based approach.

41. If there is anything else I can assist with, I can be contacted in Chambers.

JAMES MAURICI
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Tuesday, 14 June 2011**

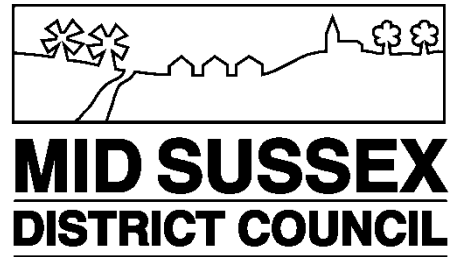
IN THE MATTER OF THE SOUTH DOWNS NATIONAL PARK AUTHORITY
AND IN THE MATTER OF PARAGRAPH 22 OF PPS7

OPINION

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Appendix 2

**Mid Sussex District Plan 2021-2039
Major Development in the High Weald**



Mid Sussex District Council

District Plan 2021-2039

Major Development in the High Weald AONB

Version: 10th October 2022

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Introduction

1. The purpose of this paper is to demonstrate that the national planning policy on major development in designated landscape areas has been fully considered in the preparation of the District Plan 2021-2039.
2. This paper sets out an approach to assessing if the proposed site allocations included in the District Plan 2021-2039 and within the High Weald Area of Outstanding Natural Beauty (AONB) could be regarded as major development. It then also indicates the next steps if the proposed site allocation is determined to be major development. Each proposed site allocation is assessed as a matter of planning judgement taking into account the factors set out and described in national policy.
3. This paper follows on from the *Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty* (October 2022) and should be read in conjunction with it. As an extension to the *Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty* paper, this paper has not repeated all the landscape details and assessment information for each site, however, these continue to still apply in this paper.
4. As part of the site selection process set out in the *Site Selection Conclusions Paper* (October 2022), the impact on the High Weald AONB has been taken into account. Sites within the High Weald AONB were assessed as having high, moderate or low impact based on the advice provided by a variety of sources. Those sites assessed as having a high impact on the High Weald AONB were not considered further in the site selection process. Therefore, at this stage of the plan-making process, the High Weald AONB has already been considered in the site selection process and sites with the highest impact filtered out from further consideration.
5. It is important to note that this paper is an assessment to determine if a proposed site allocation is major development. The process of determining whether a site is acceptable development and suitable for allocation in the District Plan is through the site selection process for the District Plan. The decision on which sites are allocated in the District Plan is a separate decision-making process.
6. The major development assessment will also help meet the duty of regard to the High Weald AONB as provided by s85(1) of the Countryside and Rights of Way Act 2000.
7. The National Planning Policy Framework (NPPF; July 2021) provides the Government's policy for conserving and enhancing landscape beauty:
 - 177 When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, 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 in 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.

⁶⁰ For the purposes of paragraphs 176 and 177, 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.

Definition of Major Development

8. The NPPF does not provide a definition for major development in AONBs, however, there are a number of sources that can be drawn upon to provide some guidelines for determining whether a proposed development is major development.
9. Footnote 60 of 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.
10. The South Downs National Park Authority has sought legal advice on the matter of major development and has published as part of the evidence for its Local Plan what has become known as the 'Maurici opinions' – that is, legal advice provided in 2011 and 2014 by James Maurici QC, and then subsequent legal advice provided by Toby Fisher in 2017.
11. The Maurici opinions provide a useful analysis of major development and set out a series of principles (derived from caselaw, guidance and appeal decisions) to be applied by decision makers when determining whether a proposed development could be regarded as major development:
 - It is a matter of planning judgement to be decided by the decision maker.
 - Major development is to be given its ordinary meaning, and it would be wrong to apply the definition of major development contained within the Town and Country Planning (Development Management Procedure) (England) Order 2015. It would also be wrong to apply any set or rigid criteria for defining major development, and the definition should not be restricted to development proposals that raise issues of national significance.
 - The decision maker may consider whether the proposed development has the potential to cause a significant adverse impact on the purposes for which the area has been designated or defined, rather than whether there will indeed be a significant adverse impact from the proposed development.
 - The decision maker may consider the proposed development in its local context as a matter of planning judgement.
 - There may be other considerations but which may not determine whether a proposed development is major development. For example, if the proposed development is Environmental Impact Assessment (EIA) development.
 - The ordinary sense of the word 'major' is important and the decision maker should take a common sense view as to whether the proposed development could be considered major development.

12. In Mr Fisher's 2017 legal opinion, he was of the view that:

‘ ... it would arguably amount to an error of law to fail to consider paragraph [177] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF.’

13. It is clear then that there needs to be an assessment to consider whether the proposed site allocations in the High Weald AONB could be major development. The assessment will be carried out at the plan-making stage (District Plan 2021-2039) in order to reduce the risk of the site allocation later being found undeliverable as a result of its assessment at the planning application stage. Such an assessment is a matter of planning judgement to be decided by the decision maker and needs to take into account the common sense meaning of the word ‘major’ and the local context.

Methodology

14. Taking into account how paragraph 177 of the NPPF is to be applied and how major development is (or is not) defined, an approach was developed for the Site Allocations DPD to assess the proposed sites in the Site Allocations DPD¹. This approach intends to be a clear framework to assess each proposed site allocation in a consistent way and to provide the basis for forming a decision on major development. This is in the context that the determination of whether a proposed development is major development is a matter of planning judgement for the decision maker.
15. It is important to note that whilst the Inspector in his report for the Site Allocations DPD came to a different view for one of the proposed site allocations and whether it could be regarded as major development (a major development assessment is a matter of planning judgement to be decided by the decision maker), he did not discuss nor disagree with the methodology and approach taken. As such it is considered appropriate to continue with the same methodology and approach albeit it has been updated slightly to refine the assessment notes.
16. The methodology has been developed and refined in discussion with the High Weald AONB Unit, Natural England, and other partners across the High Weald AONB and other protected landscapes.
17. There are two stages to the assessment:
 - Stage 1 – Determining major development
 - Stage 2 – Consideration of major development

Stage 1 – Determining major development

18. An assessment based on the factors set out in footnote 60 of the NPPF has been used to inform the decision as to whether a proposed site allocation could be regarded as major development (Figure 1). It is an assessment to determine if a proposed site allocation is major development, rather than whether it is a site suitable for allocation in the District Plan. The process of

¹ <https://www.midsussex.gov.uk/media/6051/tp1-major-development-in-the-high-weald-aonb-topic-paper-v2.pdf>

determining whether it is acceptable development is through the site selection process for the District Plan².

Factor (NPPF footnote 60)	Assessment Notes	Potential source(s) of information
Nature of development	An assessment of the type of proposed development is considered, e.g. housing, employment, mixed use. Consideration is also given to the likely form of the proposed allocation such as the dwelling mix or employment use. Consideration of the characteristics and perceptual qualities of the High Weald AONB will also be taken into account, e.g. scale of landscape, views, tranquillity and dark skies.	• SHELAA • Draft District Plan 2021-2039 • High Weald AONB Management Plan
Scale of development	An assessment of the proposed allocation in terms of its own size, e.g. number of dwellings, employment land area, and in relation to the existing settlement, e.g. the increase in the size of the settlement through either land area and/ or number of households. It is not considered appropriate to identify thresholds for when the scale of development may be regarded as major, rather each proposed allocation should be qualitatively assessed taking into account the other assessment factors such as the settlement form and type, the proposed density of development, as	• MSDC GIS • High Weald AONB Management Plan

² The decision on which sites are allocated in the District Plan is a separate decision-making process (see the Site Selection Conclusion Paper: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/>).

Factor (NPPF footnote 60)	Assessment Notes	Potential source(s) of information
	well as the characteristics of the High Weald AONB. The scale of the wider landscape around the proposed allocation will also be considered – if the proposed allocation is in an open landscape with long distance views or if it has a smaller-scale enclosed form. The scale of the proposed allocation will be assessed to see if it is in keeping with the scale of the surrounding landscape.	
Setting of development	An assessment of the spatial relationship of the proposed allocation in the context of settlement form taking into account the local context, e.g. infilling, extension to existing settlement, farmstead development, land use, topography, heritage assets. The spatial context of the proposed allocation is also an important consideration. This includes looking at the historic settlement pattern in the wider area. For example, if the settlements in the wider area are distinct small villages or have more of a linear form. It should be remembered that an AONB is a nationally-valued landscape with a high status of protection.	• Mid Sussex Design Guide • High Weald Housing Design Guide • High Weald AONB Management Plan • High Weald AONB research reports on settlements • Conservation Area Appraisals • Historical maps • Atlas of Rural Settlement GIS³ • Historic England: Medieval Settlements⁴ • Historic Farmstead Character⁵ • Neighbourhood plans • Site visit • Landscape and Visual Impact Assessment (LVIA)
The potential for significant adverse impact on AONB purposes (to conserve and	An assessment of the proposed allocation against	• The High Weald AONB Unit has provided a series of GIS layers to the District Council that map

³ <https://historicengland.org.uk/research/current/heritage-science/atlas-of-rural-settlement-in-england/>

⁴ <https://historicengland.org.uk/images-books/publications/iha-medieval-settlements/>

⁵ <https://www.highweald.org/about-the-high-weald-unit/aonb-team/420-home/research-reports/475-historic-farmstead-character.html>

Factor (NPPF footnote 60)	Assessment Notes	Potential source(s) of information
enhance the natural beauty of the High Weald AONB)	the High Weald AONB Statement of Significance: • Five components of character 1. Geology, landform and water systems 2. Settlement 3. Routeways 4. Woodland 5. Field and Heath • Land-based economy and related rural life • Other qualities An assessment of the proposed allocation against the High Weald AONB Management Plan objectives. The Statement of Significance defines the natural beauty of the High Weald AONB and the Management Plan objectives advise how to conserve and enhance the High Weald AONB. Other factors to consider include the time-depth of a site, taking account of its history and heritage, and also how the site supports ecosystem services as this supports the key components of the High Weald AONB. Links to biodiversity net gain should also be made.	the components of character and these will be used to inform the assessment. • High Weald AONB Management Plan • Site visit to consider the perceptual qualities of the High Weald AONB, e.g. tranquillity. • Landscape and Visual Impact Assessment (LVIA) • Natural England ALC007 Map – Agricultural Land Classification London and the South East
Conservation and enhancement of the High Weald AONB	An assessment of whether the proposed allocation conserves and enhances the High Weald AONB. This part of the major development assessment reflects the duty of regard set out in Section 85 of the Countryside and Rights of Way Act 2000.	• High Weald AONB Management Plan • Landscape and Visual Impact Assessment (LVIA)

Factor (NPPF footnote 60)	Assessment Notes	Potential source(s) of information
	Could the proposed development have a significant adverse impact on the purposes of the High Weald AONB? What is the landscape and visual impact of the proposed development?	
The ordinary meaning of the word 'major'	Can the proposed allocation be described as 'major' in the ordinary meaning of the word? This may take into account the context of the High Weald AONB. The further from an existing settlement and built development and the more rural the setting, the more likely that development will be considered 'major'. It should be remembered that opinions will vary between individuals as a result of, <i>inter alia</i>, their experiences, views towards development and the location where they live.	• N/A
Draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty	An assessment of the proposed allocation against the requirements set out in the draft District Plan policy.	• Development plan (Mid Sussex District Plan 2014-2031) • Draft District Plan 2021-2039
Cumulative impacts	An assessment of whether the proposed allocation may lead to cumulative impacts when considered alongside other proposed allocations. This will be used to inform the site selection process for the District Plan as this is the process for determining if a site is acceptable development and suitable for allocation.	• Draft District Plan 2021-2039 • Sustainability Appraisal • Site Selection Papers • Landscape and Visual Impact Assessment (LVIA)

Factor (NPPF footnote 60)	Assessment Notes	Potential source(s) of information
Conclusion	Taking all the above factors into account, is the proposed allocation considered to be major development? The proposed allocation could be regarded as major development as a result of just one factor or it may be a combination of factors that leads to a conclusion of major development. If the proposed allocation is considered to be major development, then proceed to Stage 2 – Consideration of major development.	N/A

Figure 1 - Stage 1 assessment - Determining major development

19. Whilst each proposed site allocation should be assessed individually to determine if it is major development, the cumulative impact of the proposed site allocations on the High Weald AONB should also be considered particularly those proposed site allocations in the same settlement (if there are any such cases) because together the proposed site allocations may contribute to additional impacts on the High Weald AONB.

Stage 2 – Consideration of major development

20. If, at the Stage 1 assessment, a proposed site allocation is considered to be major development, then it proceeds to the Stage 2 assessment which is the consideration of major development.
21. There needs to be an exploration of exceptional circumstances at the plan-making stage. This is because there is the opportunity at plan-making stage to consider different options for a spatial strategy to meet the housing needs of the District, and this may seek to lessen any potential harm to the High Weald AONB such as selecting alternative locations for development. The principle of development is established through an allocation at the plan-making stage, so an assessment of exceptional circumstances at the plan-making stage should reduce the risk that an allocated site is undeliverable at the planning application stage because it cannot meet the major development test as set out in the NPPF. This assessment (Figure 2) is based on paragraph 177 of the NPPF and includes consideration of:
- Any exceptional circumstances
 - If the development is in the public interest
 - A justification of need
 - Any alternative ways of meeting that need
 - An assessment of harm

22. The exceptional circumstances for each site allocation that is taken forward should also be reviewed at the planning application stage. This is because there may be changes between the time of the site allocation at the plan-making stage and the planning application. It will also help to meet the requirements of paragraph 177 of the NPPF.

Factor (NPPF paragraph 177)	Assessment Notes	Potential source(s) of information
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	This may include reference to housing land supply and the provision of affordable homes for local people, plus any other relevant NPPF policies. It could also reference infrastructure improvements. Compliance with the development plan is also a consideration.	• NPPF • Development plan (Mid Sussex District Plan 2014-2031) • Draft District Plan 2021-2039 • Sustainability Appraisal • Site Selection Papers
The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way	This may include reference to other known sites and reasonable alternatives, and the potential to deliver these sites. Compliance with the development plan is also a consideration. Any potential cumulative impacts may be taken into account.	• Development plan (Mid Sussex District Plan 2014-2031) • Draft District Plan 2021-2039 • SHELAA • Sustainability Appraisal • Site Selection Papers
Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated	This may reference the High Weald AONB Statement of Significance and any mitigation measures.	• Development plan (Mid Sussex District Plan 2014-2031) • Landscape and Visual Impact Assessment (LVIA) • High Weald AONB Management Plan • Draft District Plan 2021-2039 policy wording
Can it be demonstrated the development is in the public interest?	The public interest test may include reference to the interaction between the landscape and people. This may include the opportunities to enhance health and well-being, and to foster the enjoyment and appreciation of nature.	• Development plan (Mid Sussex District Plan 2014-2031) • Draft District Plan 2021-2039 • High Weald AONB Management Plan • Public rights of way network • Current land use

Factor (NPPF paragraph 177)	Assessment Notes	Potential source(s) of information
	Compliance with the development plan could also be regarded as being within the public interest ⁶ .	
Are there any other exceptional circumstances?	This would include any other relevant material considerations, however, exceptional should mean 'rarity' ⁷ .	

Figure 2 - Stage 2 assessment - Consideration of major development

23. The approach indicates what matters could be considered during the assessment and the potential sources of information to inform that assessment. The assessment will consider that if despite giving great weight to conserving and enhancing landscape and scenic beauty of the High Weald AONB, there are exceptional circumstances and that the proposed site allocation is in the public interest⁷.
24. The major development assessment for each proposed site allocation is contained in the appendix to this paper.

⁶ Appeal decisions APP/D3830/W/19/3231996 and APP/D3830/W/19/3231997 | Land off London Road, Bolney
| Decision date: 16th December 2019

⁷ *R (Mevagissey Parish Council) v Cornwall Council* [2013] EWHC 3684 (Admin)

Appendix A: Major Development Assessment for the Proposed Site Allocations

Policy Reference	DPH8	SHELAA ID	198
Site address	Land off West Hoathly Way, East Grinstead		
Units	45	Gross site area (Ha)	2.0
Stage 1 – Determining major development (NPPF footnote 60)			
Nature of development	This is a proposed housing allocation for 45 dwellings. The site is to the south of East Grinstead and outside of the built-up area boundary. The site is approximately 75m from the built-up area boundary at its closest point.		
Scale of development	Using the built-up area boundary to assess the size of the settlement, the site represents an increase of 0.28% in the built-up area of East Grinstead and an increase of 0.34% in the number of dwellings. The High Weald AONB is a small-scale landscape of small fields, small woodlands and dispersed historic farmsteads and hamlets. The landscape also has perceptual qualities such as tranquillity, dark skies, views and a sense of naturalness. It is considered that whilst the scale of the site is relatively small compared to the size of East Grinstead, it is located in an area of low density development and so the proposed yield of this site may be out of character with its immediate surroundings.		
Setting of development	The site is located between a historic routeway and ancient woodland and adjacent land uses include a recreation ground and grassland. West Hoathly Road has a rural character and there are distant views from the road and across the site to the east as well as views of East Grinstead to the north. Since the land rises to the south, this site may also be visible from East Grinstead. Development of the site would form an extension of East Grinstead but would also represent encroachment into the countryside.		
The potential for significant adverse impact on AONB purposes for which the area has been designated (as set out in the High Weald AONB Statement of Significance)			
Assessment contained in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper.			
Conservation and enhancement of the High Weald AONB	Whilst this site will lead to development in the High Weald AONB, there are also opportunities to conserve and enhance the AONB as described in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper when considering the High Weald AONB Management Plan objectives. At a local scale, built development would lead to changes in the landscape and potential changes to its character.		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	No. It should be remembered that opinions will vary between individuals as a result of, <i>inter alia</i> , their experiences, views towards development and the location where they live.		

Draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty	It is considered that the proposed site allocation is in accordance with draft Policy DPC4 at this stage of the plan-making process due to its nature, scale and setting. It is recommended that the design and layout of the site takes into account the objectives of the High Weald AONB Management Plan which have been considered in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper and the surrounding settlement pattern and character. This will provide opportunities to conserve and enhance the High Weald AONB. This will be assessed further at the time of the planning application and prior to its determination.
Cumulative impacts	One of the key principles of the spatial strategy set out in the District Plan 2021-2039 is to protect designated landscapes. In line with the settlement hierarchy, it is recognised that there will be an element of development in the High Weald AONB to meet the needs of those settlements within the AONB. There is also likely to be development across the High Weald AONB in other districts and boroughs. Since there are no other proposed site allocations near this site, it is considered unlikely there will be any cumulative impacts at a local scale. The Site Selection Papers detail the process by which the housing sites proposed for allocation in the District Plan 2021-2039 have been identified, tested and found to be the most suitable for delivering housing growth to meet the housing need of the District.
Conclusion	NOT MAJOR DEVELOPMENT The proposed site allocation is reasonably well-located to the settlement of East Grinstead and relatively small in scale. Whilst the site does not appear to directly impact on the AONB character components, there is likely to be loss of the Mediaeval field system and potential impact on the ghyll woodland. Development would represent encroachment into the countryside, however, careful design of its layout and materials along with an appropriate defensible boundary may help to mitigate the impact. Although the site is unlikely to be in the most tranquil and rural part of the High Weald AONB, opportunities to protect tranquillity and dark skies should be taken. The site needs to be developed as a landscape-led approach in accordance with draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty. The High Weald AONB Management Plan, High Weald Housing Design Guide and associated documents such as the High Weald AONB Colour Study also need to be taken into account when designing the site.

Policy Reference	DPH17	SHELAA ID	984
Site address	The Paddocks, Lewes Road, Ashurst Wood		
Units	8-12	Gross site area (Ha)	0.8
Stage 1 – Determining major development (NPPF footnote 60)			
Nature of development	This is a proposed housing allocation of between 8-12 dwellings. The site is previously developed with an existing dwelling in a large plot and a couple of paddocks.		
Scale of development	Using the built-up area boundary to assess the size of the settlement, the site represents an increase of 3% in the built-up area of Ashurst Wood and an increase of 1.8% in the number of dwellings. The High Weald AONB is a small-scale landscape of small fields, small woodlands and dispersed historic farmsteads and hamlets. The landscape also has perceptual qualities such as tranquillity, dark skies, views and a sense of naturalness. It is considered that the scale of the site would be in keeping with the landscape characteristics because it is previously developed and due to its size in relation to the existing settlement of Ashurst Wood.		
Setting of development	The site is to the rear of existing residential development along Lewes Road. The existing residential development forms part of the historic settlement pattern of Ashurst Wood. There are mature trees on the site boundaries with woodland to the south and west and ancient woodland in close proximity to the site. Close to the built-up area for Ashurst Wood and with access on to the A22 Lewes Road, the site is unlikely to be very tranquil nor is it likely to experience very skies due to nearby development and streetlights.		
The potential for significant adverse impact on AONB purposes for which the area has been designated (as set out in the High Weald AONB Statement of Significance)			
Assessment contained in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper.			
Conservation and enhancement of the High Weald AONB	Whilst this site will lead to development in the High Weald AONB, there are also opportunities to conserve and enhance the AONB as described in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper when considering the High Weald AONB Management Plan objectives. At a local scale, built development would lead to changes in the landscape and potential changes to its character.		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	No. It should be remembered that opinions will vary between individuals as a result of, <i>inter alia</i> , their experiences, views towards development and the location where they live.		

Draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty	It is considered that the proposed site allocation is in accordance with draft Policy DPC4 at this stage of the plan-making process due to its nature, scale and setting. It is recommended that the design and layout of the site takes into account the objectives of the High Weald AONB Management Plan which have been considered in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper and the surrounding settlement pattern and character. This will provide opportunities to conserve and enhance the High Weald AONB. This will be assessed further at the time of the planning application and prior to its determination.
Cumulative impacts	One of the key principles of the spatial strategy set out in the District Plan 2021-2039 is to protect designated landscapes. In line with the settlement hierarchy, it is recognised that there will be an element of development in the High Weald AONB to meet the needs of those settlements within the AONB. There is also likely to be development across the High Weald AONB in other districts and boroughs. Since there are no other proposed site allocations near this site, it is considered unlikely there will be any cumulative impacts at a local scale. The Site Selection Papers detail the process by which the housing sites proposed for allocation in the District Plan 2021-2039 have been identified, tested and found to be the most suitable for delivering housing growth to meet the housing need of the District.
Conclusion	NOT MAJOR DEVELOPMENT The site may directly impact on the AONB woodland character component, however, with the retention and continued protection of the mature trees on the site boundaries and consideration given to the design and layout, it is considered a low impact as it would represent a small-scale development on previously developed land. Although the site is unlikely to be in the most tranquil and rural part of the High Weald AONB, opportunities to protect tranquillity and dark skies should be taken. The site needs to be developed as a landscape-led approach in accordance with draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty. The High Weald AONB Management Plan, High Weald Housing Design Guide and associated documents such as the High Weald AONB Colour Study also need to be taken into account when designing the site.

Policy Reference	DPH28	SHELAA ID	1106
Site address	Land at Hyde Lodge, London Road, Handcross		
Units	C2	Gross site area (Ha)	3.0
Stage 1 – Determining major development (NPPF footnote 60)			
Nature of development	This is a proposed allocation for C2 use, however, the nature of the C2 use has yet to be determined.		
Scale of development	Using the built-up area boundary to assess the size of the settlement, the site represents an increase of 9.49% in the built-up area of Handcross. The High Weald AONB is a small-scale landscape of small fields, small woodlands and dispersed historic farmsteads and hamlets. The landscape also has perceptual qualities such as tranquillity, dark skies, views and a sense of naturalness. It is considered at this stage of the plan-making process that the scale of the site would be in keeping with the landscape characteristics due to its size in relation to the existing settlement of Handcross.		
Setting of development	The site is to the north of Handcross and does not adjoin the main village and historic settlement. However, recent development has extended Handross northwards so that the site now abuts the built-up area boundary. The recreation ground is outside the built-up area boundary so there is still a sense of separation between the main village and the northern part of the built-up area. The site boundaries have mature trees and there are large areas of ancient woodland to the east and west of the site. The A23 lies to the west of the site so the site is unlikely to be in the most tranquil part of the AONB. The nearby main roads also have streetlighting which may impact on dark skies.		
The potential for significant adverse impact on AONB purposes for which the area has been designated (as set out in the High Weald AONB Statement of Significance)			
Assessment contained in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper.			
Conservation and enhancement of the High Weald AONB	Whilst this site will lead to development in the High Weald AONB, there are also opportunities to conserve and enhance the AONB as described in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper when considering the High Weald AONB Management Plan objectives. At a local scale, built development would lead to changes in the landscape and potential changes to its character.		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	No. It should be remembered that opinions will vary between individuals as a result of, <i>inter alia</i>, their experiences, views towards development and the location where they live.		

Draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty	It is considered that the proposed site allocation is in accordance with draft Policy DPC4 at this stage of the plan-making process due to its nature, scale and setting. It is recommended that the design and layout of the site takes into account the objectives of the High Weald AONB Management Plan which have been considered in the <i>Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty</i> paper and the surrounding settlement pattern and character. This will provide opportunities to conserve and enhance the High Weald AONB. This will be assessed further at the time of the planning application and prior to its determination.
Cumulative impacts	One of the key principles of the spatial strategy set out in the District Plan 2021-2039 is to protect designated landscapes. In line with the settlement hierarchy, it is recognised that there will be an element of development in the High Weald AONB to meet the needs of those settlements within the AONB. There is also likely to be development across the High Weald AONB in other districts and boroughs. Since there are no other proposed site allocations near this site, it is considered unlikely there will be any cumulative impacts at a local scale. The Site Selection Papers detail the process by which the housing sites proposed for allocation in the District Plan 2021-2039 have been identified, tested and found to be the most suitable for delivering housing growth to meet the housing need of the District.
Conclusion	NOT MAJOR DEVELOPMENT Whilst the site does not appear to directly impact on the AONB character components, it would extend development to the north of Handcross away from the main village and historic settlement. It is, however, reasonably well-located to the settlement of Handcross and is on the B2114 London Road. It is also likely to be fairly small-scale given the size of the site. Although the site is unlikely to be in the most tranquil and rural part of the High Weald AONB, opportunities to protect tranquillity and dark skies should be taken. The site needs to be developed as a landscape-led approach in accordance with draft District Plan Policy DPC4: High Weald Area of Outstanding Natural Beauty. The High Weald AONB Management Plan, High Weald Housing Design Guide and associated documents such as the High Weald AONB Colour Study also need to be taken into account when designing the site.

Responses to MSDC Email issued to Carnegie Group dated 29.10.25**Marquee Temporary Structures**

The planning statement states the application is seeking permission for:

“Annual temporary structures: Event tent (50m x 85m), catering tent (25m x 65m), seminar tent (25m x 65m)”

None of the recently amended site plans indicate or annotate these temporary structures.

Full elevation details of these structures at an appropriate scale in accordance with the councils adopted validation checklist of 1:50 or 1:100 need to be provided, and the site plan needs to be amended to reference these structures.

Applicant response – these details were submitted to MSDC subsequently and were uploaded to the on-line planning register on 02.12.25. They remain valid.

In regard to the temporary structure could you please advise the general periods of the year when work commences and when they are removed

Applicant response – the temporary structures are only required for the 3-day International Association of Scientologists (IAS) event held every October. The earliest the event is held is starting on 6th October and the latest it can be held is the last 3 days of October. Work to erect the temporary structures needs to start in the middle of August and generally, the structures are removed in totality by the end of November at the latest.

The application also references supporting structures such as a concrete ring. Full details of these structures will need to be provided and shown on the submitted site plan with relevant elevations and cross sections.

Applicant response – These details are now provided in the updated Design and Access Statement.

I note the superseded drawings make reference to a crane pad and platform if these are still intended the full details of these are required.

Applicant response – A crane pad and platform are no longer required.

The planning statement also advises:

“Field levelling and drainage: Including a new retention pond, preventing flooding and safeguarding soil quality [DP41].”

The retention pond does not appear to be on the site plan or within the Flood Risk Assessment could you advise if this is still included.

Applicant response – Drainage details for both Juhring and Hobbs Fields that include below ground attenuation tanks are provided on pages 14 and 15 of the revised February 2026 Design and Access Statement prepared by the Carnegie Group.

If it is included, then the location of the pond and cross section details of the pond need to be provided and how the excavated material will be dealt with needs to be addressed.

Applicant response – See response above.

The application also advises that there will be changes to ground level in order to facilitate the temporary structures. Accordingly, you will need to submit a topographical plan indicating existing and finished ground levels this should include contour levels.

Applicant response – Existing levels are shown on drawing 1093.01-16 Rev A. Proposed levels are shown on QED drawings 24-164-QED-XX-XX-DR-C-501 Rev P03 for Juhring Field and QED drawing 24-164-QED-XX-XX-DR-C-502 Rev P03 for Hobbs Field.

In addition, cross sections should be provided marking existing and proposed levels. The existing plans currently submitted with the application do not show this in sufficient detail.

Applicant response – Site Sections are shown on Enplan drawing 1232-ENP-SI-00-DR-L-90500 and Carnegie drawings 1093.01-015_A and 1093.01-017_A

Details of how any excavated materials will be dealt should be addressed. If the material is being kept on site, where is it going?

Applicant response – Originally the proposal was that all spoil would be kept on Juhring field but that is no longer thought to be possible. It is nevertheless anticipated that the excavated material will be able to be spread on other land within the wider Saint Hill site and the enclosed mark-up drawings ‘As dug Topsoil Area DWG No 1’ and ‘As dug Topsoil Area DWG No 2’ provide indicative locations that are likely to be used. This will confirmed at Stage 4 design.

OTHER ISSUES

Location Plan

Location plans are required to include a blue line that indicates land in the applicant ownership that is adjacent or close to the application site but that does not form part of the application site.

This is detailed in Planning Practice Guidance Making an Application [Making an application - GOV.UK](#).

“A location plan should be based on an up-to-date map. The scale should typically be 1:1250 or 1:2500, but wherever possible the plan should be scaled to fit onto A4 or A3 size paper. A location plan should identify sufficient roads and/or buildings on land adjoining the application site to ensure that the exact location of the application site is clear.

The application site should be edged clearly with a red line on the location plan. It should include all land necessary to carry out the proposed development (e.g. land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings). A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.

Paragraph: 024 Reference ID: 14-024-20140306”

The blue line included on the submitted location plan does not appear to include all the surrounding land in the applicant’s ownership.

If this is the case, could you please amend the submitted location plan.

Applicant response – Existing and Proposed Location Plan 1093 001 Rev N submitted in December 2025 includes the full blue line.

Access

The submitted red line location plan and drawing ref PTC/CA/45417/04 seem to indicate that the proposed northern visibility splay for the new access may be on land not in your client’s ownership or control of the highway authority could you confirm if this is the case or not.

If not, please indicate how you intend to ensure that it is provided and maintained.

Applicant response – Actions were taken when submitting the revised application form in December 2025 to identify the landowner involved.

Application Form

A new updated application form will be required to reflect the changes and to correctly identify the proposal this includes the following areas.

Change the description of development.

Existing Use

The permitted exiting use of the fields should be identified as agriculture/vacant (any use of the fields for temporary parking or events are currently associated with Permitted Development Rights)

Material Section

Lacks details.

The washroom material needs to be amended as it is now proposing sandstone for the external walls with green roof.

Waste

Details of how the waste will be dealt with need to be completed.

Foul Sewer Section

This states foul drainage is to package treatment but also connecting to existing sewer The flood risk assessment indicate it is to the existing foul sewer.

The above needs to be clarified. If it is to be a package treatment plan, details of this need to be provided on an appropriate drainage plan including its location within the red line application site.

If this is outside the application site, the red line will need to be amended. If this includes land not in your client's ownership the appropriate certificate will be required and confirmation provided on how you intend to ensure that it can be provided.

Nonindustrial floor space

The response needs to include the area of the temporary structures.

Applicant response – these matters were addressed with the revised application form submitted in December 2025.

Washroom

No roof plan has been provided.

Elevation drawings should annotate all of the proposed materials.

Applicant response – these details are shown on drawing 1093 028 Rev B that was previously submitted in December 2025.

Noise Assessment

This assessment is based on the assumption that the existing use of the site is for events and parking. This needs to be addressed as the permitted lawful planning use of the site is agricultural/vacant and the report should reflect this (any events/parking are temporary are currently associated with Permitted Development Rights).

It states in the introduction.

"It is proposed to expand the existing site and infrastructure to support the operation of large annual events. The development land encompasses approximately 25,000m² and will accommodate approximately 750 new car parking spaces. The land is currently open space which is already used for events parking, and it is understood that a number of large events already occur at the site throughout the year, and the changes proposed are designed to make the setup and operation of the events easier for the organisers, rather than increase capacity or undertake changes which would increase noise emissions.

As such the development of the land is not proposed to provide any impact upon the existing road network or introduce any new noise sources to the area. This assessment is therefore undertaken to determine the impact as it stands and not to predict noise levels from new noise sources or events."

In addition, the noise assessment seems to relate only to the proposed car parking not the entire development it states in the conclusion.

"MZA Acoustics Ltd has been appointed by Church of Scientology Religious Education College Inc (the Client) to undertake a noise impact assessment related to the proposed site infrastructure upgrades to facilitate the annual events held at Church of Scientology Advanced Organization & Saint Hill, Saint Hill Road, East Grinstead, RH19 4JY.

This report presents a noise impact assessment for the proposed car park, which replaces an existing car park at the same site."

Could this issue please be clarified?

Applicant response –As part of the MSDC managed licensing regime for the IAS event, a Noise Management Plan is agreed and report produced each year. A report can be provided for the outcome of the 2025 event if required. Aside from the IAS Event, the field is left as an agricultural field at all times.

Air Quality

The air quality assessment is also based on the assumption that the existing use of the site is for events and parking. This needs to be addressed for the reasons set out above, as the authorised uses is agricultural and the reports should reflect this.

It also references that 691 spaces will be in use less than once a month but based on the supporting information this is incorrect.

The number of parking spaces is also incorrect.

Applicant response – A revised Air Quality Assessment was submitted as part of the revisions in December 2025.

Arboricultural Assessment

This will need to be updated to reflect the amended site plans and the changes to parking space numbers etc.

Applicant response – A revised Arboricultural Assessment was submitted as part of the revisions in December 2025.

Design and Access Statement

This will need to be updated to reflect the amended information.

The statement also identifies that a list of vendor data was submitted with the planning application, but I am unable to locate this.

Applicant response – The Economic Impact Assessment prepared by Marshall Regen Ltd supplants the data previously mentioned. The Economic Impact Assessment is referred to in the DAS and Planning Statement.

Other Events

The design and access statement and transport statement references that the proposed site and existing fields are used for a wide range of events such as Christmas Lights Easter Egg Hunt Guy Fawkes Spring Fair could you advise if the application is seeking consent for a permanent change of use of the Hobbs Field to an event space or just for the temporary period of the main annual event.

If other events are proposed, could you give a general indication of the events and when they are held.

Applicant response – Please see covering letter to this application, the main body of this Planning Statement and revised Design and Access Statement for confirmation of the proposed use of Hobbs Field.

Parking

The application advises the proposed parking areas are to be used for the rugby club and other community uses and a range of event such as Christmas Guy Fawkes etc.

The design and access statement includes details of the potential level and area of parking.

Could you confirm if the parking will be open for community uses all year round and other events.

The transport statement and travel plan needs to ensure they reflect these vehicle movements, if it is to be open all year round.

Applicant response - Please see covering letter to this application, the main body of this Planning Statement and revised Design and Access Statement for confirmation of the proposed usage of the proposed parking areas, both the hard surface and temporary areas.

Surface Water (Drainage) Assessment

The flood risk assessment advises in regard to surface water drainage.

"The drainage strategy proposes managing surface water runoff from the car park by providing attenuation before discharging into an existing watercourse at the west of the site. Outfall to watercourse in wooded area in agreement with adjacent landowner. Relevant permissions to be ascertained prior to construction."

As this will involve a system across third party land could you advise the mechanism by which this can be addressed to ensure planning department can enforce its implementation and maintenance.

Applicant response – the drainage system proposed includes the provision of attenuation tanks on site with the outflow limited to green field run-off rates and is therefore no different to existing.

Transport

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.

Applicant response – This was rectified in with the revision made in December 2025.

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).

Applicant response - This was rectified in with the revision made in December 2025.

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

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.

Applicant response - This was rectified in with the revision made in December 2025.

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.

Applicant response - This was rectified in with the revision made in December 2025.

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

Applicant response – It is confirmed that these vehicles are hired for the event.

Waiting Room Area

The amended site plan drawing no SK60 Rev A states:

“The waiting area now features masonry external structure to match St. Hill Manor and the neighbouring garage.”

Elevation details to an appropriate scale of this structure need to be provided.

Applicant response – These were provided on drawing 1093.01 027 Rev B submitted in December 2025.

Planning Statement

In the section on proposed development the planning statement advises:

“CellPave reinforcement: Main event field – supporting heavy machinery (cherry pickers, cranes, forklifts). ”

Just to clarify you are not seeking consent to park and store heavy equipment just to create a surface that can withstand the heavy equipment that is required to erect the temporary structures.

Applicant response – This assumption is correct, consent is sought to create a suitable surface. It is not proposed to park and store heavy equipment.

The number of parking spaces needs to be amended.

Applicant response - Please see covering letter to this application, the main body of this Planning Statement and revised Design and Access Statement for confirmation of the proposed number of parking spaces.

The statement also advises:

“Field levelling and drainage: Including a new retention pond, preventing flooding and safeguarding soil quality [DP41]”.

The retention pond does not appear to be shown on the site plans or within the Flood Risk Assessment.

If this pond is still proposed, then the location needs to be shown along with cross sections to show the depth and detail of the pond and details of how the excavated material is to be dealt with need to be provided.

Applicant response – The retention pond is not proposed.

Bund

Site plan ref 061Rev K references a Bund but no details other than the location have been provided. Cross sections should be provided to show the height and shape of the bund along with details of the material for construction.

Applicant response – The bund previously proposed is no longer shown on Site Plan ref 1093 060 Rev M.

General Ground Levels

While noting there will be changes to ground levels in the area of the temporary structures you need to provide a topography plan with existing levels of the entire site to establish the existing levels.

Applicant response – Existing Topography drawing 1093.01 16 Rev A is now provided with this submission.

If there are any other proposed changes to ground levels then a proposed ground level plan should be submitted with relevant cross sections to address these changes.

Applicant response – Site Sections are shown on Enplan drawing 1232-ENP-SI-00-DR-L-90500 and Carnegie drawings 1093.01-015_A and 1093.01-017_A

Any other drawings that are potentially indicating existing or proposed ground levels for example in the Flood Risk Assessment should details these level changes and annotate these levels in the drawing key.

Applicant response – These are shown on the drainage drawings prepared by QED Structures.

Event Field Site Plan Drawing No 62 Rev C

The key to the drawing only has 9 numbered annotations yet the site plan references 11 these needs updating. The location of the concrete ring the and the temporary structures are not defined or annotated.

Annotation 6 states *"Slope Transition (for full details see civil engineers design)"*.

No civil engineer design appears to have been submitted.

The temporary structures are not defined or annotated.

Applicant response – These comments were addressed in the revised drawing 1093 62 Rev E submitted in December 2025. In relation to civil engineers design, these are included in the February 2026 revised Design and Access Statement.

Carpark Site Plan A, Drawing 061 Rev K

This fails to annotate the permanent and overfill car parking areas, the dark green, light green and orange areas.

The transport statement identifies 5% active and 15% passive electric car charging spaces, but these are not indicated on the drawing.

Applicant response – These matters were addressed in the revised drawing 1093 061 Rev L

Site Plan A3 Drawing Ref

It does not indicate or define the location of the temporary structure the concrete ring etc.

Annotation 12 states "Carpark design by Enplan (SEE LANDSCAPE DESIGN) "this is insufficient you need to reference the specific drawings.

Furthermore, this plan only identifies the permanent parking area for the other potential parking areas. The plans just define the surface material to be used not what they are being used for.

I would recommend for clarity and definition that the shading and fill areas indicated on the drawings are annotated in the same format as the submitted landscaping scheme drawings.

As a general comment, the above plans are insufficiently annotated. The key should annotate all relevant shadings and fill indicated, so the extent of the areas of work are clearly defined. Can this please be addressed.

Applicant response – These comments are addressed in the December 2025 revisions

Gates

The design and access statement and the landscape scheme advise the access will be controlled by gates and a barrier, but no specific details of the location or elevations of these have been submitted.

Applicant response – These are included in the details prepared by Enplan and submitted in December 2025.

Proposed Surface and General Materials

There appears to be some confusion in the planning application in regard to the proposed surface materials for the car park, access routes etc.

The submitted planning statement advises the following.

“CellPave reinforcement:

o Main event field – supporting heavy machinery (cherry pickers, cranes, forklifts).

o Juhring Field – durable parking for 900+ vehicles, while maintaining a green, grassed surface [DP21, DP37, DP38].”

The event site plan ref Dwg 63 rev C indicates Cellpave and 50 Cellpave HD in the Hobbs field area.

The Design and Access statement references the potential use of Geosynthetics Ltd, Golpla grid for the car park with grass and gravel fill, Total Traffic Exopave (TTE) with gravel fill.

No details of the ground reinforcement are indicated on the car park site plan ref Dwg 061 Rev K. This drawing needs to be updated so the council can assess the extent of the relevant areas.

The application advises these systems will require an appropriately engineered subbase to maintain integrity.

Can you please provide full details (technical spec) of whatever cell systems or ground treatment you are proposing need to be provided with relevant typical cross sections.

Applicant response – Please see relevant section in summary on page 26 and in detail on page 30 of the revised February 2026 Design and Access Statement

Boundary Treatments

If you are proposing any boundary treatments such as walls, fence etc these need to be detailed on the relevant site plans and typical elevation sections, at an appropriate scale, provided.

Applicant response – No boundary treatments are proposed as part of the scheme.

Generator Enclosure

Elevation details of the amended generator enclosure need to be provided.

Applicant response – These are now provided in the revised February 2026 Design and Access Statement

Section 106 Agreement

In light of the response from the Councils ecology team due to part of the biodiversity gain dated 29/08/2025 which states:

“We note that the proposals include off-site enhancements within the blue line boundary. This will need to be registered with 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.”

I can confirm that a section 106 agreement will be required if you could therefore provide details of your solicitor.

Applicant response – The applicant’s Solicitor will be Heidi Copland from DMH Stallard LLP. Contact details will be provided under separate cover.

Amended Information

Any submitted supporting documents along with any associated drawings will need to be updated to reflect the proposed and required changes.

For example, the amended site plans changed the parking layout and the extent of the building accordingly the landscape and tree plan and details will need updating.

The Flood Risk Assessment the Transport Statement the Air and Noise Assessments the Design and Access statement etc will need to be updated to reflect these changes.

In regard to any documents the council is happy for this to be done by a covering letter referencing the documents and providing the necessary changes.

Appendix 4

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>

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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: J005039

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 J005039 - *Heritage Impact Assessment - Car Park & Events Field, Saint Hill Manor 23.10.25* with the initial application material and a revised document J005039 - *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*

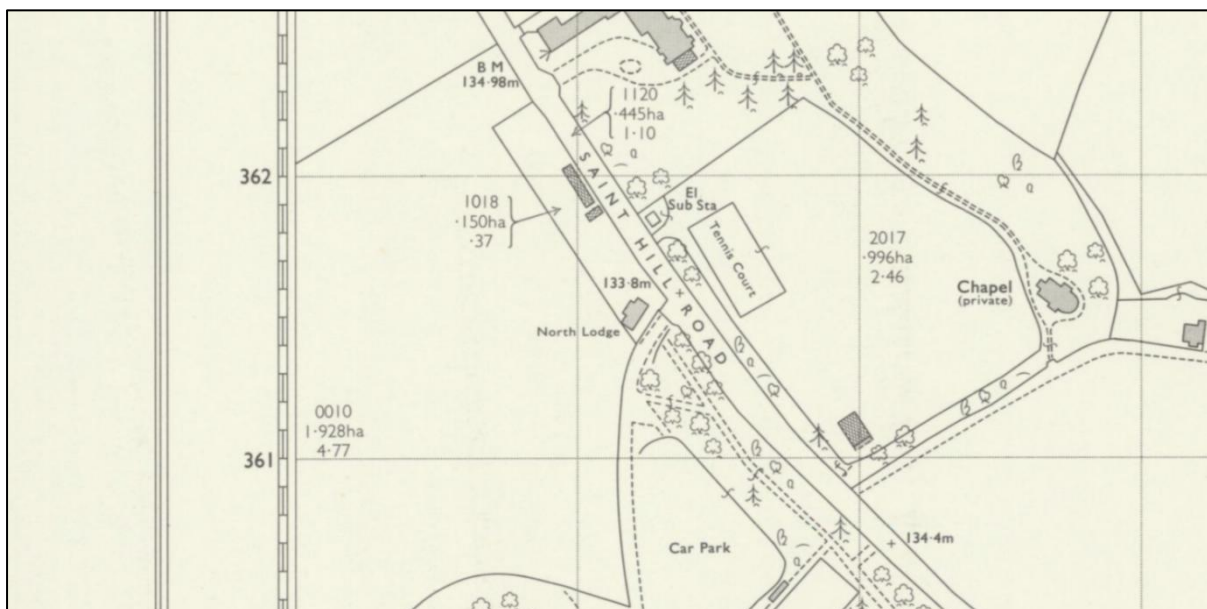


Figure 1: OS Map Extract North Lodge, 1970

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

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*.

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)*.

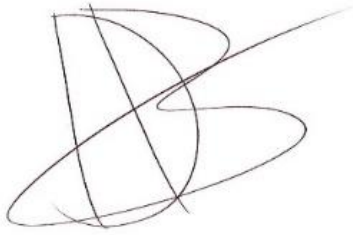
Proposals would also accord with *paragraph 135* of the *NPPF* where it states that decisions in relation to such development should be *sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation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

enquiries@ws-heritage.co.uk | ws-heritage.co.uk

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Planning Director: Mr S Copping BA (Hons) DipTP MRTPI

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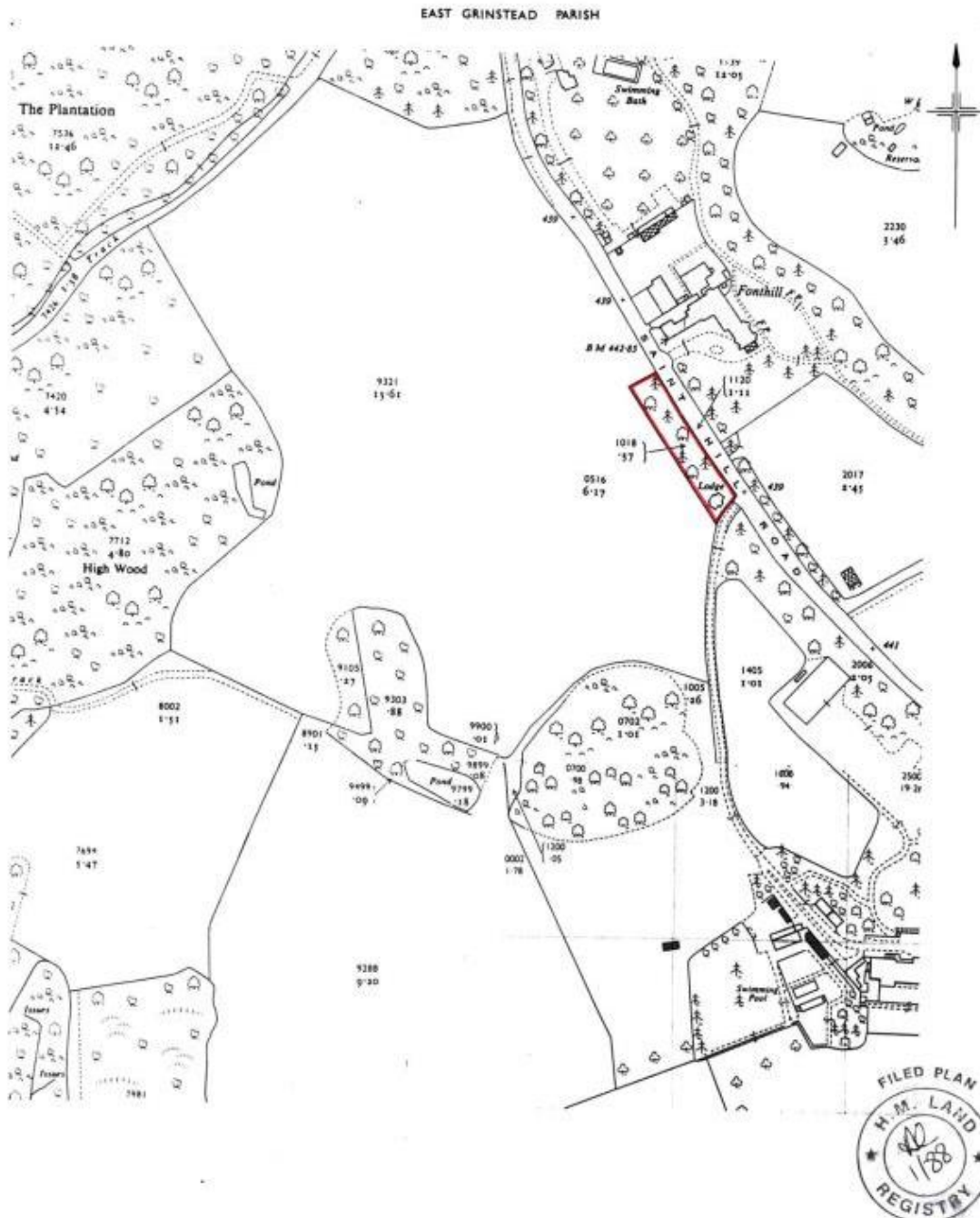
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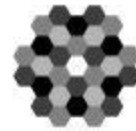
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H.M. LAND REGISTRY		TITLE NUMBER	
		WSX 117409	
ORDNANCE SURVEY PLAN REFERENCE	COUNTY		
	WEST SUSSEX	MID SUSSEX DISTRICT	
Scale: 1/2500		TQ3735 A	© Crown Copyright



This official copy is incomplete without the preceding notes page.



Official copy of register of title

Title number WSX117409

Edition date 06.06.2012

- This official copy shows the entries on the register of title on 26 SEP 2024 at 12:11:12.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 26 Sep 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Durham Office.

A: Property Register

This register describes the land and estate comprised in the title.

WEST SUSSEX : MID SUSSEX

- 1 (24.07.1987) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being North Lodge, Saint Hill Green, East Grinstead, (RH19 4JU).
- 2 The land has the benefit of the rights granted by but is subject as mentioned in a Conveyance of the land in this title dated 22 May 1959 made between (1) His Highness Maharaja Sir Sawai Man Singh Bahadur and (2) Broadland Properties Limited and (3) Herbert Dennis Hall.

NOTE 1: Original filed

NOTE 2: No further details of the Agreement dated 7 September 1937 referred to were lodged on first registration.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (16.05.2012) PROPRIETOR: UK BUILDINGS AND LAND LIMITED (Co. Regn. No. 7670465) of North Lodge, Saint Hill Road, East Grinstead, West Sussex RH19 4JU and of 42-44 Copthorne Road, Felbridge, East Grinstead, Surrey RH19 2NS.
- 2 (16.05.2012) The price stated to have been paid on 4 May 2012 was £650,000.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (06.06.2012) The land is subject to the lease set out in the schedule of leases hereto.

Title number WSX117409

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	06.06.2012	North Lodge	01.06.2012 50 years from 4 May 2012	WSX350632

End of register

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)
www.midsussex.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 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.
---	---

• 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.
---	---

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



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

Appendix 6

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

High Weald Joint Advisory Committee

Woodland Enterprise Centre
Hastings Road
Flimwell
East Sussex TN5 7PR

Tel: 01424 723011
Email: info@highweald.org



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](#)

One of the National Landscapes family

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and Dee Valley
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

Need to make it clear this will be once a year only

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. **Again need to be clear on usage as well as "making existing use less prone to damage"**

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. **Can show photos of how trashed it gets
Show renderings to prove look will no be discordant**

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: **15m buffer area PLUS no dig road which HELPS root protection area**

- increasing the amount of dust, light, water, air and soil pollution **No increase to traffic so this is not an issue**
- increasing disturbance to wildlife, such as noise from additional people and traffic **No increase to traffic so this is not an issue**
- changing the landscape character of the area **Development will maintain the rural look which currently gets destroyed for about 6 months out of the year.**

What discrepancy? 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.** **BNG clearly states that the habitats will increase rather than decrease with the proposal**

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.

Untrue. Against the Economic Impact Assessment AND the fact the event will move to another country if planning refused the council must weigh this up against potential harm to the area.

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. **Ecological Impact Assessment states the opposite.**

Not true. Ecological Impact Assessment states NO trees are suitable for roosting bats (page 14). Writer has misread the section.

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’.

Appendix 7

**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

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:

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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

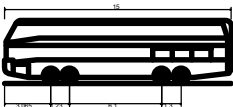
2.3.18 It is assumed these vehicles are hired for the event could this be clarified.

Pelham Transport Consulting Response

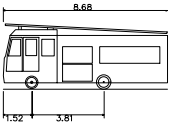
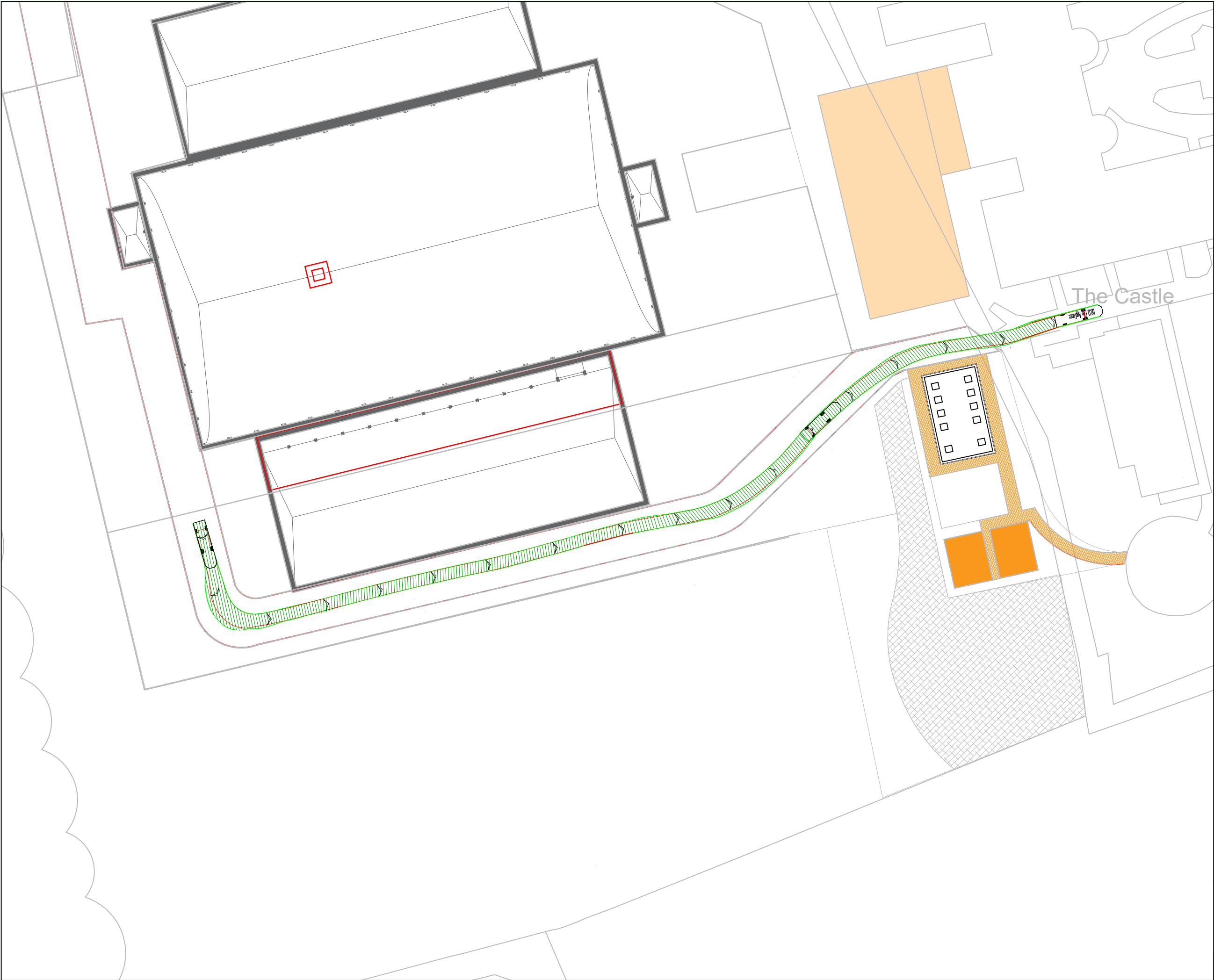
2.3.19 There are no vehicles for events kept on site and these are hired just for events.

APPENDIX A SWEPT PATH MOVEMENTS



DESIGN VEHICLE	
	
15m 6WS Luxury Coach	
Overall Length	15,000m
Overall Width	2,500m
Overall Body Height	4,157m
Min Body Ground Clearance	0,397m
Track Width	2,500m
Lock to lock time	5,00s
Wall to Wall Turning Radius	12,490m

Project Title Saint Hill Events			
Drawing Title Saint Hill Road Coach Swept Path Pick-up			
Originator RP	Approved	Date 15.02.2026	Scale 1:500 @ A3
Drawing No. PTC/CA/45417/13	Rev.	Sheet No.	

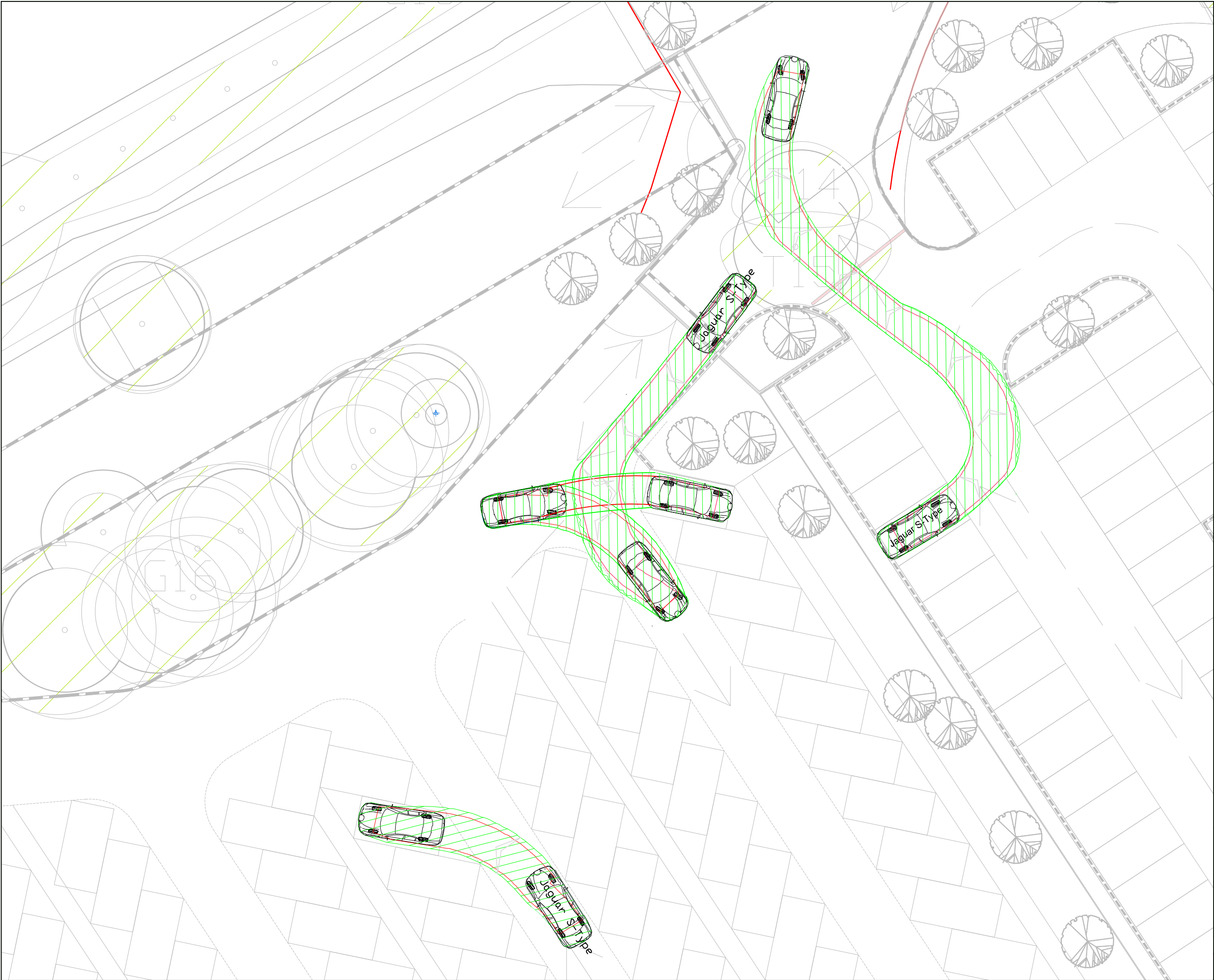


DB32 Fire Appliance
Overall Length 8.680m
Overall Width 2.180m
Overall Body Height 3.437m
Min Body Ground Clearance 0.337m
Max Track Width 2.121m
Lock to lock time 6.00s
Kerb to Kerb Turning Radius 7.910m

Project Title
Saint Hill Events

Drawing Title
Saint Hill Road
Fire Tender Swept Path

Originator RP	Approved	Date 20.02.2026	Scale NTS
Drawing No. PTC/CA/45417/14	Rev.	Sheet No.	



4.939

0.9372.909

Jaguar S-Type

Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Max Track Width
Lock to lock time
Kerb to Kerb Turning Radius

4.939m
1.878m
1.474m
0.229m
1.544m
4.00s
6.000m

Jaguar S-Type

Project Title
Saint Hill Events

Drawing Title
Saint Hill Road
Car Swept Path

Originator RP	Approved	Date 20.02.2026	Scale NTS
Drawing No. PTC/CA/45417/15	Rev.	Sheet No.	

Appendix 8

**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.

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

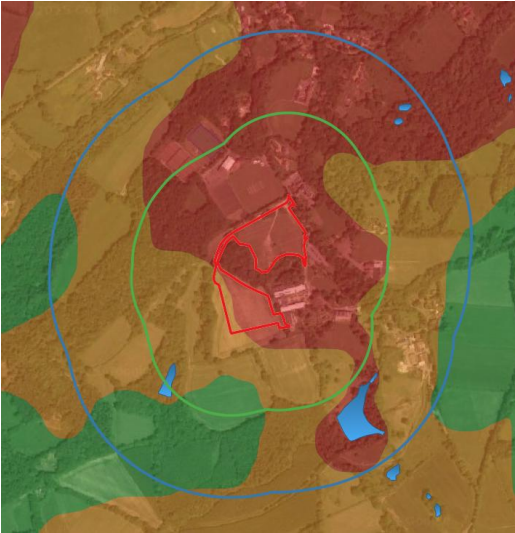
DMH Stallard LLP

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”*.

Appendix 10

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.

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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.

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

**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

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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

Appendix 15

**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.

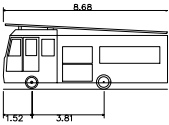
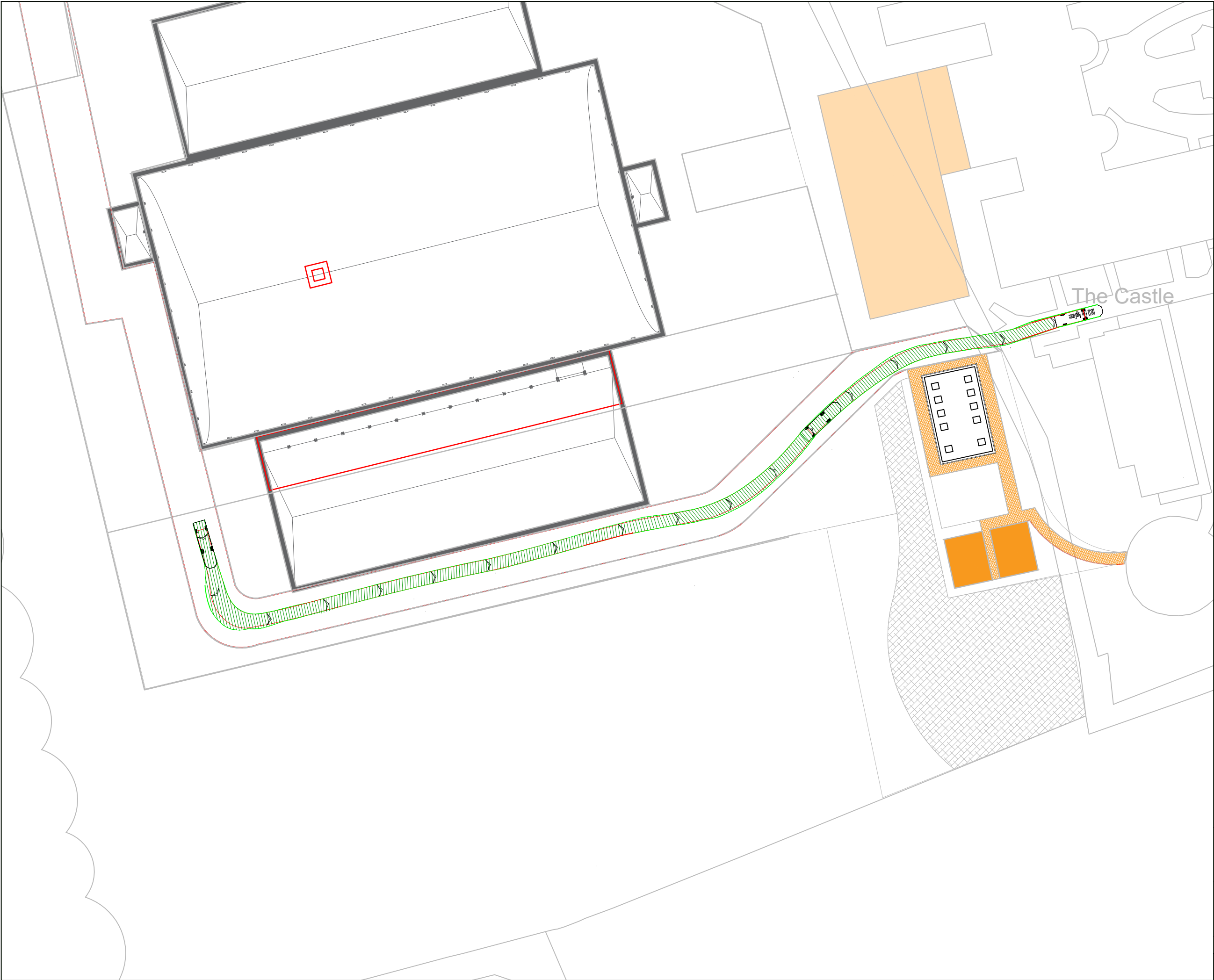
Yours faithfully

DMH Stallard LLP

DMH Stallard LLP

Enc

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



DB32 Fire Appliance	8.680m
Overall Length	2.180m
Overall Width	3.437m
Overall Body Height	0.337m
Min Body Ground Clearance	2.121m
Max Track Width	6.00s
Lock to lock time	7.910m
Kerb to Kerb Turning Radius	

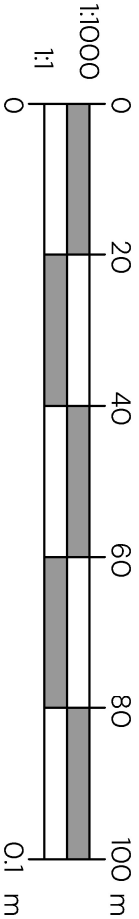
Project Title
Saint Hill Events

Drawing Title
Saint Hill Road
Fire Tender Swept Path

Originator RP	Approved	Date 20.02.2026	Scale NTS
Drawing No. PTC/CA/45417/14	Rev.	Sheet No.	

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FOR COMMENT

FH Proposed Fire Hydrant Location



Site plan with Plant enclosure in context. 1:1000



• Carnegie Steel Buildings Ltd T/A BM Steels • Email: info@bmsteels.co.uk
• Address: The Beeches, Old Ln, Tatsfield, Westerham TN16 2LH • Phone: 01959 572501

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