

**Holmsted Farm
Staplefield Road
RH17 5JF**

**New access road
Planning Statement
0468**

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1. Introduction

- 1.1 Planning permission is sought for a new vehicular access onto Cuckfield Road, comprising a partly retrospective and partly proposed internal roadway (*'the Proposal'*) at Holmsted Farm, Staplefield Road, Cuckfield, Haywards Heath, West Sussex, RH17 5JF (*'the Site'*). The Proposal is approximately 130 metres long. Mid Sussex District Council (*'the Council'*) is the local planning authority. The Site is situated on the western side of Staplefield Road / Cuckfield Road, north of Sloughgreen Lane, within the countryside and the High Weald National Landscape (*'the National Landscape'*).
- 1.2 The Proposal aims to create a dedicated access to the campsite and other leisure facilities separate from the commercial and private entrances into the farm estate. This will help minimise conflicts and enhance navigation along the internal route through existing buildings. A campsite was approved on 31 March 2022, planning ref. DM/22/0201 (*'The 2022 Permission'*), for the *"Siting of ten bell tents, one stretch tent, and associated car parking"*. When assessing The 2022 Permission, the assessing officer noted in their report (*'OR'*) that *"West Sussex County Council Highways Authority have been consulted on the application and raise no objection."* Furthermore, the existing access into the site, off Staplefield Road, was considered to have limited visibility; however, the data available at that time indicated it was not operating unsafely. Regarding the overall acceptability of the campsite use to the south alongside highway safety, the OR stated the following:

"The site would be accessed via the existing access onto Staplefield Road, B-classified road subject to national speed limit. Visibility to the south of the access is slightly restricted, however an inspection of data supplied to WSCC by Sussex Police over a period of the past five years reveals that there have been no recorded injury accidents within the vicinity of the site. Therefore, there is no evidence to suggest that the existing junction is operating unsafely or that this proposal would exacerbate an existing safety concern. The proposed glamping use is not anticipated to result in a material intensification of use of the existing access over the existing uses on site. The LHA also notes that the campsite has been operating under permitted development rights and no highway safety concerns have arisen."

[...]

The Local Highway Authority therefore considers that the proposal would not have

an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the NPPF, and that there are no transport grounds to resist the proposal. The LHA recommend conditions regarding car parking, cycle parking and electric vehicle charging spaces. Regarding the recommended cycle parking, it is considered that due to the nature of the proposal and that visitors would be accompanied by luggage it would not be practical to journey to the site by bicycle and therefore a condition for cycle storage is not considered necessary or reasonable in this instance."

- 1.3 The Applicant asserts that the Proposal is a policy-compliant plan designed to support the ongoing economic viability of the Site by improving its functionality through dedicated access to specific uses. It will enhance the Site's usability by establishing a clear circulation system for its various users. Consequently, as mentioned above, these activities can continue, promoting economic sustainability and social cohesion. The Proposal does not adversely affect the character and appearance of the National Landscape and is therefore consistent with the policies governing development in this designated land category.

2. Site and Context

- 2.1 The wider Holmstead Farm site is a mixed-use commercial and agricultural estate. The estate includes various types of buildings, characterised by diversification into a mixed-use area offering Class E, B8, Sui Generis, and Sports and Recreational spaces. The farm is accessed via a long driveway onto Staplefield Road. The estate is situated below the existing land topography to the south. The application site is located in the south-east corner of Holmstead Farm. It is outside any defined settlement boundary and is therefore regarded as countryside. It also falls within a National Landscape, formerly known as the High Weald Area of Outstanding Natural Beauty. Additionally, it is within Flood Zone 1, which carries a low risk of flooding.
- 2.2 Application ref. DM/21/1306 for converting part of an agricultural building into a flexible commercial use (Cross Fit gym) also gained approval by notice dated 11 December 2020.
- 2.3 Application ref. DM/22/2808 sought permission to change the use of an existing building from B8 to research and development of products or processes. The proposed use relates to renewable energy provision and addresses matters similar to

this application. Permission was granted by notice dated 03 April 2023. The decision was made in accordance with the Mid Sussex District Plan 2014-2031, which remains relevant to this new application. The applicant notes the emerging 2021-2039 Mid Sussex District Plan submitted on Monday, 08 July 2024, and is subject to its ongoing examination in public. Emerging policies remain compatible with the current Local Plan.

- 2.4 The committee report found the location acceptable when assessing the low-key use in relation to the overall scale of activity. Once again, the proposal was deemed acceptable regarding its impact on the highway network and the National Landscape:

“It should also be noted that there are no public rights of way that intersect the site and the implementation of this project will have little to no visual impact on the immediate vicinity or the characteristics and visual qualities of the AONB.”

[...]

“The LHA considers that the proposal would not have an unacceptable impact on highway safety or result in severe cumulative impacts on the operation of the highway network. The LHA has confirmed that the proposal is compliant with the NPPF and in their view there are no grounds to refuse permission. Your Planning Officer has no reason to disagree with this assessment.”

- 2.5 A separate application ref. DM/2022/0201 obtained planning permission for the placement of ten bell tents, one stretch tent, and associated parking.
- 2.6 Planning permission (ref. DM/23/3175) was given to convert agricultural land for dog exercise. Permission was approved by notice dated 23 October 2023. This involves land outside the main farm complex on former agricultural land.
- 2.7 The most recent application, ref. DM/25/0345 (*‘the 2025 Permission’*), authorised the construction of a mixed-use commercial building for flexible commercial uses, which could fall under use Class E(g) or be used for storage and distribution, use Class B8. In commenting on the 2025 Permission, the Council’s highways officers concluded that the proposal would not severely impact the highway network. They noted that their conclusions were based on various considerations, including the Site’s sustainability, and also stated that the use would not lead to a significant increase in traffic movements compared to the permitted, historic uses.

“Sustainability

The submitted TA does look at sustainable transport options within the vicinity. There are two bus stops to the south of the site with connections to Crawley. Realistically given the type of use, the majority of visits would be via the car. However as previously stated the proposal is not anticipated to result in a material increase in traffic movements over the permitted and historic uses.”

- 2.8 Prior approval was sought for the “Proposed erection of an agricultural machinery store for the storage of business machinery, on land in agricultural use, with a maximum height of 6.0m to the ridge, and eaves measuring 5.3m”. By notice, planning ref. DM/24/3063 dated 15 January 2025, confirmed prior approval was not required.
- 2.9 Taken together, these permissions provide a recent snapshot of the mix of concurrent activities across the Site.

3. Legal and Policy Framework

- 3.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires the decision-maker to consider (a) the development plan, (b) local finance considerations, and (c) any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act states that applications must be decided in accordance with the plan unless material considerations suggest otherwise.
- 3.2 National policy is outlined in the National Planning Policy Framework (*‘the Framework’*), updated in December 2024. Existing policies are detailed in the Mid Sussex District Plan (*‘the Local Plan’*) and the Ansty, Staplefield & Brook Street Neighbourhood Plan 2015–2031 (*‘the Neighbourhood Plan’*). Other key policy documents include the High Weald National Landscape Management Plan 2024–2029 and the Mid Sussex Design Guide (November 2020).
- 3.3 The courts have determined that, since development plans often contain conflicting policies, the key factor is whether a proposal complies with the development plan. In *Islington LBC v Secretary of State for Communities and Local Government* [2012] EWHC 1716 (Admin), the court stated:

“These policies need to be seen as a whole rather than individually since the statutory question in s.38(6) requires a judgment as to whether proposed development accords with the Development Plan, not whether it accords with individual policies, a number of which may pull in a variety of differing directions when applied to a particular proposal.”

- 3.4 In other words, policies should not be overly rigid, technical, or formulaic. Instead, applications should be assessed holistically, weighing the Proposal’s positive aspects against any relevant restrictions or limitations. It is widely recognised that local planning authorities must ensure consistency in their decision-making and the application of local policies. This is especially crucial for subsequent decisions relating to the same site or similar circumstances.

4. Planning Assessment

Principle of Development

- 4.1 The planning system aims to contribute to achieving sustainable development, as outlined in paragraph 7 of the Framework. Paragraph 8 clarifies the three objectives necessary for progressing towards sustainable development. Limb a) of the policy refers to the economic objective:

“8 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”

- 4.2 The Framework advocates for planning foster decisions that create conditions enabling businesses to invest, expand, and adapt. It emphasises the importance of development that drives economic growth and productivity. Paragraph 85 of the Framework highlights the significance attributed to proposals that stimulate economic growth and their broader importance to the British economy.

“85. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” [Emphasis added]

- 4.3 Chapter 6 of the Framework outlines the government’s comprehensive strategy for a strong and competitive economy. Paragraphs 88 and 89 explicitly focus on the rural local economy. There is a clear emphasis that, while development should be sensitive to its context, Councils must recognise and promote opportunities beyond urban areas.

“88. Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

89. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements,

should be encouraged where suitable opportunities exist.” [Emphasis added]

- 4.4 The implication is that supporting economic development in rural areas is acceptable if the proposed development is considerate of and compatible with its surroundings. In this context, compatibility includes visual impact on the National Landscape and highways. Policy DP1 Sustainable Economic Development is a job-driven policy outlined across various elements. The policy safeguards existing sites and encourages their intensification and redevelopment by effectively utilising employment land and premises. The policy explains that:

“Effective use of employment land and premises will be made by:

Protecting allocated and existing employment land and premises (including tourism) unless it can be demonstrated that there is no reasonable prospect of its use or continued use for employment or it can be demonstrated that the loss of employment provision is outweighed by the benefits or relative need for the proposed alternative use;

Permitting appropriate intensification, conversion, redevelopment and/ or extension for employment uses providing it is in accordance with other policies in the Plan;

Giving priority to the re-use or adaptation of rural buildings for business or tourism use and the diversification of activities on existing farm units (in accordance with Development in the Countryside policies).” [Emphasis added]

- 4.5 As with Framework paragraphs 88 and 89, LP DP1 does not restrict development within the previously developed curtilage, provided it aligns with other LP policies already summarised, such as ensuring compatibility with visual impact on the National Landscape and highways. Amenity is of limited importance since it involves an access road on a site sufficiently distanced from nearby residential receptors, as outlined in The 2022 Permission’s OR:

“The closest neighbouring property are No.s 1 to 4 Slough Green Cottages which back onto the field between the properties and the proposal with a separation distance of at least 220 metres. To the eastern side of Staplefield Road are No.s 1 to 4 Council Cottages which are at least 200 metres from the proposal.

[..]

Given the above comments and recommended conditions along with separation distances between the proposal and neighbouring properties it is considered that the proposal would not cause significant harm to the amenities of neighbouring properties and would thereby comply with policies DP26 and DP29 of the Mid Sussex District Plan.” [Emphasis added]

Compatibility with the National Landscape

- 4.6 In Chapter 15 of the Framework, which deals with the conservation of the natural environment, paragraph 189 emphasises the significance of safeguarding National Landscapes, which hold the highest protection status. Paragraph 190 further specifies the approach the Council must adopt when evaluating this application for planning permission, stating:

“190. When considering applications for development within National Parks, the Broads and 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.” [Emphasis added]

- 4.7 LP policy DP16: High Weald National Landscape provides support in the second paragraph and in the third, outlining conditions that favour proposals which do not detract from the visual qualities and essential characteristics of the designation.

“[...]

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.

Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the views into and out of the AONB by virtue of its location or design.” [Emphasis added]

- 4.8 The Proposal is to develop an access road within an established mixed-use site that benefits from diverse building forms. The road remains relatively discreet when viewed from the public realm. Compared to existing structures on the site, it does not detract from the natural beauty and character of the National Landscape. It integrates seamlessly into the Site and the wider National Landscape. Overall, the integrity and character of the National Landscape are maintained.

Impact on Highways

- 4.9 Highway considerations are a key factor in this Proposal. When they are vital to the planning balance, the Framework clearly states that they justify refusal only when there is an unacceptable impact on highway safety.

“116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

- 4.10 Paragraph 118 then outlines the information requirements for different scales of development and, within the scope of this small Proposal, sketches a comprehensive transport assessment:

“118. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”

- 4.11 LP policy DP21: Transport is complex, encompassing the need for sustainable locations, safeguarding other road users, and capacity, particularly within the National Landscape. The policy outlines:

“[...]

decisions on development proposals will take account of whether:

-The scheme is sustainably located to minimise the need for travel noting there might be circumstances where development needs to be located in the countryside, such as rural economic uses (see policy DP14: Sustainable Rural Development and the Rural Economy);

[...]

-The scheme provides adequate car parking for the proposed development taking into account the accessibility of the development, the type, mix and use of the development and the availability and opportunities for public transport; and with the relevant Neighbourhood Plan where applicable;

[...]

- The scheme does not harm the special qualities of the South Downs National Park or the High Weald Area of Outstanding Natural Beauty through its transport impacts.”

- 4.12 A Transport Statement prepared by CTA Civils and Transport supports the application. Please refer to this document for a detailed assessment of the Site’s compliance with relevant planning policies. However, to provide a brief summary, the Transport Statement concluded that the Proposal will not lead to ‘unacceptable highway or transport impacts’. This conclusion is detailed in Section 4 of the Transport Statement.

Other matters

- 4.13 The Preliminary Ecological Assessment (‘PEA’) supporting the application (Prepared by Libby Morris, dated May 2024) found *“that a small amount of modified grassland – a common and widespread habitat with low ecological value – has been lost due to the construction of works. However, it is thought that this has had a low impact on the overall biodiversity at site level only.”*
- 4.14 The supporting information demonstrates compliance with relevant policies regarding ecology, which can be found in the PEA. Further details are available in the supporting documents. Demonstrating Biodiversity Net Gain is not required in this case, as the Proposal seeks partly retrospective planning permission with minimal

work required for existing habitats.

5. The planning balance

- 5.1 The Proposal was developed after careful consideration of the council's previous positive decisions expressed in earlier permissions. The road is necessary to continue using the site to support various economically beneficial activities, aligning with the aims of sustainable development related to economic growth and local policies that seek to create and sustain jobs.
- 5.2 Furthermore, the principle of development is established when the Proposal is acceptable within a National Landscape, which is partly supported by its planning history, where larger massing uses were deemed acceptable. It will also not cause an unacceptable impact on the highway network.