

High Weald Joint Advisory Committee

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High Weald
National
Landscape

www.highweald.org

Working together to care for an Area of Outstanding Natural Beauty

Mid-Sussex District Council

Emailed to joseph.swift@midsussex.gov.uk

9th April 2026

Dear Mr Swift

DM/26/0073 The erection of 44 new homes with access from West Hoathly Road, vehicle and cycle parking, landscaping, drainage, and associated infrastructure and highway works. Land Off West Hoathly Road East Grinstead West Sussex

Thank you for consulting us on the above application.

In summary, the High Weald National Landscape Unit considers that the layout and design of the proposed residential development does not demonstrate a satisfactory response to the High Weald Housing Design Guide, and would result in a poor quality layout and design, contrary to objectives S2, W1, W2 and Planning Principle 3 of the High Weald AONB Management Plan, such that the proposal would fail to conserve and enhance the natural beauty of the High Weald National Landscape (HWNL).

Further, the proposed street lighting within the scheme would have a disruptive impact on both the rural landscape character and the dark night skies of the HWNL, and on the adjacent Ancient Woodland, contrary to Objectives DS1 and DS2 of the High Weald AONB Management Plan, and advice in the HWNL Dark Skies Planning Advice Note.

We advise that significant amendments to the design and layout of the scheme should be sought in order to arrive at a scheme that does conserve and enhance the HWNL in accordance with NPPF para 189.

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 (HWNL) 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

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

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

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

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Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
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Cotswolds
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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

carrying out of their functions in relation to it, and is a material consideration for planning applications affecting the HWNL.

Principle of the Development

We note that the site is allocated in the Mid-Sussex District Local Plan (reg 19 submission version) as DPA4 for up to 45 dwellings. In view of the advanced stage of the draft Local Plan, and that the Inspector has not invited further discussion regarding this proposed site at the Examination hearing, we raise no objection to the principle of development of the site.

However, in our response to the Mid-Sussex District Local Plan reg 19 consultation in 2024, we set out that we were concerned that the proposed quantum of dwellings, 45, would be difficult to achieve in an appropriate landscape led design approach, bearing in mind the need to retain existing landscape features of the site such as heavily treed boundary hedgerows, the on-site mature trees, and the Ancient Woodland (Rockingshill Wood) on the south-eastern boundary of the site, along with appropriate buffers.

As set out in our detailed comments on the proposed scheme below, our concerns regarding the relationship of development with the existing landscape features of the site, in particular the on-site mature trees, have not been satisfactorily resolved.

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 the following Management Plan Objectives:

- Settlement S1: *To protect the historic pattern and character of settlements.*
- Settlement S2: *To enhance the architectural quality of the High Weald and ensure new development reflects the character of the High Weald in its siting, scale, layout and design.*
- 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.*
- 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 High Weald AONB Housing Design Guide (2019) seeks to support the High Weald AONB Management Plan, and particularly objectives S1 and S2 of the Settlement Character Component of the Management Plan. The Guide aims to give succinct, practical and consistent advice to set clear design expectations for new housing development within the HWNL, to help to ensure higher quality and landscape-led design that reflects intrinsic High Weald character, and is embedded with a true sense of place, without stifling innovation and creativity.

Layout and Design

Whilst we do not object to the principle of development of the site, development must be designed and laid out in such a way that meets the above Management Plan objectives and the High Weald AONB

Housing Design Guide, in order to ensure that the natural beauty of the HWNL is conserved and enhanced.

We have significant concerns with the proposed layout and design, as set out below. The layout and design approach of the proposed residential development is considered to be an unsatisfactory response to the High Weald Housing Design Guide and would result in a poor quality layout and design, contrary to objective S2 of the High Weald AONB Management Plan. In particular, we would highlight the following:

- Overall, the layout and design approach appears to represent the very type of generic housing development advised against in the Housing Design Guide. The scheme fails to provide a layout with a robust sense of HW settlement character in terms of grain, streetscape and massing. The scheme seeks to reference local distinctiveness merely in vernacular ‘styling’ of individual buildings and materials, but without deploying deeper, locally characteristic design or place-making elements in layout, grain and massing. Contrary to the Design & Access Statement p20 and p21 we do not agree that the *“Perimeter block design - retains soft edge to countryside whilst delivering a legible well connected urban grain with improved building relationships”* or that there is *“A variety of linked character areas, with scale, massing and detailed design varying within a shared design framework and materials palette”*, for the following reasons.
- Contrary to Design Guide Theme DG3 *Layout & Structuring the Site*, there is a lack of street hierarchy in both the street layout and its population with built form; instead the grain, scale and disposition of buildings, is broadly homogenous. This is not overcome by the proposed changes in street surfacing material from tarmac to block paving in certain locations – the Design Guide highlights that *“Responding to and supporting the street hierarchy in three dimensions is critical. The scale of subsequent plots, buildings and trees, and the degree of building enclosure and street width to building height ratio, all should respond to the type of street.”* This rigour and place-making is absent in the proposed scheme; contrary to the suggestion of the D&A Statement, there is negligible difference between ‘Character Area 1: The Street’ and ‘Character Area 2: The Lanes/Transition’ in terms of streetscape rhythm, grain and grouping of built form, and parking treatments, so this appears a redundant distinction. In part this stems from the buildings being arranged in the central ‘round-a-bout island’ of development, an uncharacteristic feature in HW settlement and streetscape pattern and which contributes to a lack of street hierarchy.
- Meanwhile ‘Character Area 3’ of the D&A Statement comprises 3 dwellings; 37, 38, and 39, of the same detached units type repeated in a row, again representing an inappropriately homogenous approach to built form in the streetscene. This is specifically advised against in DG5, which sets out that *“Clusters of large, detached buildings of similar scale, massing, footprint and spacing are uncharacteristic of the High Weald and should be avoided in new developments.”* Contrary to p36 of the D&A Statement, there is nothing about the streetscene rhythm, building scale and massing of ‘Character Area 3’ that appears ‘less dense’ than elsewhere in the scheme, nor does it ‘evoke a rural, countryside feel’ as claimed.
- The grain of development and massing of buildings fails to follow the advice of Design Theme DG5 *The Right Built Form*; the proposal lacks the intimacy of scale, grain and character of High Weald settlements and instead is primarily populated with similarly massed detached and semi-detached dwellings of homogeneous form and spacing. This is advised against in DG5, which sets out that *“repetitious use of a similar unit type in scale, mass of form, stamped over the site, with no reference to context or character within the site, should be avoided, since it will generally result in a contrived, artificial built form which will feel alien in the wider settlement context.”* The broadly homogenous built forms (whether configured as one dwelling or subdivided into two) and their spacings are

demonstrated in the illustration on p41 of the D&A Statement as well as in the submitted street-scenes. The uncharacteristic loose grain is further created by the short runs created by frequent double driveways which also disrupt the streetscene coherence and sense of enclosure.

- Further in this regard, the narrow end-on detached units 12, 19, 24, 31, 36 and 40 are a particularly uncharacteristic built form in High Weald settlements and would appear particularly incongruous in a streetscene, as shown in the submitted street-scenes.
- The apartment block in the northern corner is the most successful part of the scheme, designed as it has been to be a terrace form and an integral, meaningful part of streetscene as per DG5 *The Right Built Form*. The rest of the scheme would be better to follow the streetscape qualities, definition and grain of this 'terrace'.
- The layout has not allowed sufficient physical and visual relief to the group of trees in the southern corner of the site, adjacent to the Ancient Woodland. This group of trees should be afforded the same 15m buffer that the AW has been (as per Woodland Action 'd' of the HW AONB Management Plan) to protect it from the detrimental direct and indirect impacts of nearby development. Moreover, and with regard to Design Theme DG1: *Responding to Site and Landscape Context*, the trees, as existing site features, should form a positive green space within the scheme, around which to structure the development – instead this wooded corner has been 'shut off' from the rest of the site, enclosed by units 20, 31 and 39.
- Again with regard to DG3, there is a lack of meaningful public realm; the proposed 'informal open space' south of units 43/44 is cramped and poorly located, in fact its presence prevents units 43/44 from being positioned further south and forming a successful piece of continuous streetscape with unit 9.
- Meanwhile there is a lack of frontage boundary enclosure and definition to certain plots (17-23, 25-30, 37-39), contrary to the detailed advice within DG4 in this regard, which highlights such enclosure as being a key local characteristic in the High Weald, and which sets out that "undefined and unenclosed front curtilages will not be appropriate in the High Weald".
- The detailed Landscape Strategy drawing no. CSA/6703/106 Rev B indicates a number of unenclosed front curtilages populated with areas of ornamental shrubs (plots 17-23, 25-30 and 37-39 inclusive). This type of ornamental ground cover planting is atypical of High Weald settlement streetscapes, and should be omitted – this is specifically referenced in Design Guide Theme DG10 *Reinforcing Local Planting Character & Habitats*, Design Guide p24 (Boundaries and Front Gardens), and the HWNL Soft Landscaping in Development Proposals Planning Advice Note.
- Contrary to Design Guide Theme DG6 *Parking Strategies*, the approach to car-parking is dominated by 'double-bay' frontage parking, leading to a streetscene dominated by hardstanding and car-parking, with the multi-crossovers and wider building spacing to accommodate such parking contributing to the unsatisfactorily loose grain of the street scene.
- Lastly, at a detailed level, with regard to Design Guide Theme DG7: *Building Appearance*, whilst the design attempts a broadly vernacular style, the scheme is heavily populated with full height brick buildings (units 12, 15/16, 20/21, 22/23, 25/26, 29/30, 31, 34/35, 38, and 41/42), which the Design Guide advises should be used very sparingly, if at all, in new developments. On units 32/33 and 27/28 the 1st floor cladding should continue fully around the building, and units 20/21 and 22/23 should not use the straight soldier course brick lintels, which the Design Guide specifically says will look inappropriate in the High Weald.

Cumulatively, the above points describe a scheme that lacks meaningful local reference in street character and in disposition and massing of built form; the suburban grain, layout and massing of built form in the

scheme would fail to provide an appropriate or place-specific response to its High Weald context, as clearly advised in the HW AONB Housing Design Guide. In view of all the above, a significant revised approach to layout on the site would be required for a scheme to meet Objective S2 of the High Weald AONB Management Plan, and to ensure the HWNL is conserved and enhanced as per NPPF para 189.

Street Lighting

We are also very concerned about the proposed provision of street lighting within the development. The adverse urbanising effects of street lighting are set out in the High Weald AONB Management Plan, and Action 'g' of the Dark Skies section of the Management Plan sets out that public bodies should *"Avoid new street lighting where possible and ensure any street lighting required for junctions on adopted roads is kept to the minimum necessary and adheres to best practice in terms of location, illuminance and equipment design and light temperature, to avoid unnecessary skyglow and light spill."* The HWNL Dark Skies Planning Advice Note (2024) supports the High Weald AONB Management Plan, and particularly objectives DS1 and DS2 of the Dark Skies Key Character Component of the Management Plan. The PAN aims to give succinct, practical and consistent advice in assessing external lighting schemes, and light spill for development proposals, to help to ensure the preservation the dark skies of the HWNL, and to protect wildlife and habitats from light pollution across the High Weald. The HWNL Dark Skies PAN highlights on p18 that street lighting should not be considered as required in all cases; it is uncharacteristic of settlements in the High Weald, and should be avoided where possible.

We note that the scheme proposes 12no. street lighting columns across the development, plus one additional lighting column in each of the two parking courts.

While Dunning's Road to the north of the site does have street lighting, and there is one lighting column at the end of Coombe Hill Road, the landscape character of site and locality is largely unlit; it is noted that modern developments such as 'Streatfield Place' to the north of the proposed development have no street lighting at their entrance junctions or within them. The submitted Design & Access Statement does not appear to include any proposals for street lighting. We note that the lighting is described in the submission as being sensitively designed and located, (eg with regard to lux levels, choice of specifications, use of cowls where appropriate). However, we consider the provision of even well-designed street lighting at this site would be a highly incongruous introduction, and would erode the rural landscape character and the dark night skies of the HWNL. Further, we consider the introduction of street lighting within the scheme would have a disruptive impact on the adjacent Ancient Woodland.

The street lighting is therefore considered to be contrary to Objectives DS1 and DS2 of the High Weald AONB Management Plan, (and Action 'g' of the same), and advice in the HWNL Dark Skies Planning Advice Note, and should be omitted from the scheme. We note the Local Highway Authority consultation comments (9/2/26) appear to make no reference to street lighting in the design of this proposal.

Layout and Woodland

The woodland adjacent to the south-western side of the site is designated Ancient Woodland (the northern arm of Rockinghill Wood) which is an irreplaceable habitat, a small portion of this woodland is within the red line boundary. Rockinghill Wood extends down south of the site and is part of a larger connected network of woody shaws, hedgerows and woodlands in the vicinity, highly valuable to wildlife and important features of the HW landscape.

Natural England provide 'standing advice' to be taken into account when making planning decisions that affect ancient woodland. This advises on the need to assess both the direct and indirect effects of development on ancient woodland and veteran trees, and that negative effects on ancient woodland or ancient and veteran trees should be avoided. Indirect impacts can include the loss or deterioration of

ancient woodland by a number of means, including by increasing the amount of dust, light, water, air and soil pollution.

The remainder of the woodland within the redline boundary in the south of the site is Priority Woodland under the Natural England Priority Habitats Inventory, valuable for wildlife, and which will have a functional relationship with the adjacent Ancient Woodland.

We are concerned about the proximity of the proposed development to the priority woodland in the southern corner of the site, being close enough that tree canopies extend over the footprint of plots 31 and 39. Whilst this is not ancient woodland and not subject to the same statutory protection regarding buffering, nevertheless the proximity of proposed dwellings, particularly units 30, 31 and 39 and their gardens, is likely to put future pressure on these trees. Meanwhile, and with regard to the gardens for plots 31 and 39 on the north side of this copse of trees, the 'HWNL Soft Landscaping in Housing Development Planning Advice Note' specifically refers to that in assessing layout proposals, consideration must be given to minimising potential future pressures for tree removal by future occupiers, and that plots should not be subject to excessive shade from retained trees which could lead to future pressure for them to be removed or cut back.

As part of the layout amendments to the scheme to address the 'layout and design' comments earlier in this response, the relationship between built form and retained trees should also be improved, and relief distances increased.

Ecological Impacts

Furthermore, it is conserved the proposed development would impact protected species that currently use the habitats on site, reducing their ability to access, move within or through the site, especially those with limited mobility.

The site has been identified in the submitted ecological reports as having suitable habitats to support commuting and foraging bats, because of the location and '...connectivity to a larger network of woodland and hedgerows in the surrounding area' (PEA 4.26) including ancient woodland within the wider surrounds. Bat surveys and automated recordings at the site recorded at least seven species including Common, Soprano and Nathusius Pipistrelle, Noctule, Serotine, Brown long-eared bat, Leisler's bat, and another four species of Myotis bat from sonogram analysis species between August and October 2025. It is worth noting that Serotine bats, although only recorded once at the site are considered vulnerable to extinction, and long-eared bat have shown recent concerning declines in numbers.

Bats are extremely sensitive to light and noise disturbance, which effects foraging activity, breeding and roosting. The proposed development would reduce the current quality of the habitats used by bats on site to forage and commute, from introduced uncontrolled levels of disturbance including light pollution. 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.

Biodiversity Net Gain

At a detailed level, we would highlight a number of concerns with the BNG submission;

- The grassland survey of the site took place in early September 2025, whilst this is just outside the best practice time of year, more critically the survey took place after the grassland had been grazed. This has potentially led to undervaluing of the grassland including its condition, as many species would not then be identifiable after grazing. Accurate surveying underpins the use of the BNG Metric. If it is not possible to survey at the optimal times or conditions, it is recommended that a precautionary approach be taken in assigning habitat type and condition. However, the BNG assessment does not use a precautionary approach and therefore we consider it under values the

grassland in the baseline assessment. The submitted Design and Access Statement clearly shows pictures (pg.7) of the site from earlier in the summer or late spring with a mixed sward height and at least one other flowering forb not identified in the September survey. Given the lack of evidence of agricultural improvements, and the paucity of both rye grass and white clover on site, the site is most likely already an 'other neutral grassland'.

- Notwithstanding the above point, the post development BNG uplift is considered unlikely to deliver real world benefits for nature and is an over estimation of what would realistically be achieved on site. It would be more realistic that any open space be proposed in the BNG Metric spreadsheet as modified (amenity) grassland in moderate condition because:
 - a. The uncontrolled levels of amenity use by locals and domestic animals in the open space around the SuDs pond and perimeter of the site are not conducive to a gain for wildlife, and would be more appropriately labelled as such amenity grassland.
 - b. The post-development narrow perimeter strips of 'other neutral grassland' will to be difficult to manage because of the encroachment of planted scrub in the same perimeter space;
 - c. shading by hedgerows and existing and newly planted trees will not produce the proposed grassland condition; and
 - d. The proposed meadow mix EM4 selected for the grassland contains species that are not characteristic of High Weald grasslands.

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.

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’.