

High Weald Joint Advisory Committee

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High Weald
National
Landscape

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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

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

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

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

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

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

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

Ecological Impacts

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

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

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

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

Yours sincerely,

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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’.