

I am writing on behalf of the Stop Cuckstye Action Group (SCAG) to object both to the planning applications **DM/23/2866** and **DM/23/2867** which given their interdependency cannot be considered separately.

SCAG was constituted as an action group in February 2022 shortly after learning the Ansty Farm site was being considered for inclusion in the initial iteration of the new District Plan. We subsequently welcomed the confirmation that it was not to be proceeded with as a “sustainable development” and we continue to campaign against any attempt to try and bring it into scope.

Similarly, to other groups and individuals who have made submissions we regard the six-week consultation period at this time of year far too short to properly consider the 200 or so documents submitted by the developer under these two applications (many of which run to over a hundred pages each). We are therefore submitting this paper as an initial response which will be followed by more detailed submissions at a subsequent date.

With regard to the detail of our objections, these can be categorised in terms of Planning policy, Sustainability, Traffic Implications, Environment and Biodiversity.

Planning.

The NPPF states that proposed housing developments should be “Plan Led”, that it be part of a cohesive overall vision for the district, rather than consisting of individual unrelated speculative ventures. Under the regime of proper plan led placemaking, proposed housing and its associated infrastructure (roads, schools, employment, etc) are considered holistically together within an overarching planning structure. That structure is already provided by the in-force District Plan which was adopted in 2018 (with minor amendments 2020). This plan remains in force until 2031 and, together with the Sites Allocation DPD, continues to contain the core in-force Policies by reference to which these applications should be assessed.

This plan contains a coherent catalogue of policies that contribute towards a single strategic objective which in the words of the plan is to support

“A thriving and attractive District, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic, and environmental well-being of our District and the quality of life for all, now and in the future”.

Key to achievement of this outcome are the following objectives.

- Land use policies that require major development to be focussed on the 3 main towns.
- Protecting and enhancing the environment.
- Promoting economic vitality.
- Ensuring cohesive and safe communities.
- Supporting healthy lifestyles

This development would serve none of these purposes. In particular it breaches the following policies that underpin the plan.

- DP3 – Village and neighbourhood development. The plan identifies the various village centres where retail and associated services have been identified for ongoing support and development. Ansty is categorically NOT one of these.
- DP6 – Settlement hierarchy. The purpose of this policy is to acknowledge the very particular settlement pattern in Mid Sussex and to plan for development around it. Four tiers of

settlement are recognised, with major development to be promoted only in those in tier 1 where the infrastructure is already in place to support it. Ansty as a tier 4 settlement is clearly therefore not suitable for such development.

- DP12 – Protection and enhancement of the countryside. In areas of open countryside development is expressly forbidden unless it is “necessary for the purposes of agriculture; or it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan”. Clearly this current application fulfils none of these exceptional requirements. In addition, 13.5% of the land area (13 hectares) consists of BMV (best and most versatile) agricultural land which is specifically identified by the NPPF as requiring enhanced protection.
- DP13 – Coalescence. The current District Plan states that – “development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements and would not have an unacceptably urbanising effect on the area between settlements”. The Ansty Farm development would clearly breach this policy as it effectively merges Ansty with Cuckfield.
- DP14- Sustainable rural development. This policy supports limited development consistent with agricultural or tourism purposes where this utilises existing agricultural or other prior development, clearly the Ansty Farm development is not permitted under this policy due to its huge scale.
- DP15 – New homes in the countryside. The policy supports limited development for agricultural or forestry needs or for new isolated dwellings of exceptional quality. Some affordable housing is permitted but (DP32) this must comprise 100% affordable housing. Once again, the Ansty Farm development fails the requirement of this policy.

Mid Sussex has a “made” plan in place that provides all housing needs up to 2031. There is in addition a five-year housing supply in place as was demonstrated by the planning appeal made by Croudace homes against Mid Sussex this year where the Inspector concluded that

“the Council had demonstrated that it can identify a supply of specific deliverable sites sufficient to provide a minimum of 5 years’ worth of housing against the standard method.”

However even had Mid Sussex not been able to demonstrate such a housing supply, this application is for outline planning permission only. It would not be able to make up for such a housing shortfall in this timescale and so is irrelevant to it.

The correct place for considering the Ansty Farm site will be in the forthcoming examination of the Review of the District Plan (2024-2039) if the possibility of allocating the Ansty Farm site is raised then. Your Council has already taken the position that major development of the Ansty Farm site is unsuitable and unnecessary, and will, if necessary, presumably justify that position at the Review’s examination. It would be illogical for your Council to approve these applications in the face of that conclusion and the current Plan’s land use policies. By bringing forward this planning application now, Fairfax are clearly attempting to undermine and subvert the planning process.

Sustainability

Fairfax claim in their planning submission that

“The small settlement of Ansty will grow and become part of something much larger, where all daily needs can be met and a spectrum of daily life can occur. At its heart, a new mixed use centre will

incorporate local shops, shared work spaces, a GP surgery and allied healthcare provision, and leisure uses, co-located with two schools and housing for the elderly, curating a 9am to 9pm culture. These uses will be reachable within easy walking and cycling distance from new and existing residents, **adhering to a 20-minute neighbourhood model**. This diversity of use will bring a new vibrancy to Ansty, fostering social interaction, encouraging active travel, and directly catering to healthcare needs, all contributing to the healthy places' agenda".

Within this feelgood word salad - which attempts to tick as many nice to have boxes as can be accommodated in a small paragraph- the suggestion that they are creating a 20-minute community neighbourhood here stands out as particularly grotesque.

The concept of the 20-minute community is indeed a core element of sustainable development but it is utterly unattainable in the setting that they suggest.

Almost everywhere where the 20-minute concept has been trialled and adopted has been within an existing urban environment in line with the principal spatial strategy of your council. There is good reason for this. Only within a densely populated area are sufficient numbers of people present in a small area to support the shops, schools, doctor surgeries, leisure activities, and employment that define such a neighbourhood.

Where new 20-minute communities are to be developed in a more rural setting then it can only be done as part of a fully thought-out integrated plan such as that which your Council has been working on. It cannot be achieved in the form of a one-off speculative planning application.

In fact, the Fairfax plan runs completely contrary to The Town and Country Planning Association's ideas as set out in their 2021 "Guide to the 20-Minute Neighbourhood". These state that the aim in rural areas should be to "concentrate development within villages rather than the undeveloped open countryside between them". In no way can the Ansty Farm development be described as the "densification" of an existing village as per the TCPA's 20-minute vision for rural communities. It is no more than an isolated housing estate on a greenfield site.

It does not in any case have the population threshold to support anything but the most basic retail provision.

As with retail, so with schools and doctors' surgeries. The commissioning of these facilities is not within the gift of Fairfax to deliver. All that the development does is to load pressure onto such facilities where they exist elsewhere.

The examples above demonstrate the hollowness of the Fairfax promise to the community which indulges the sort of magical thinking that supposes a retail park, or a school can be made to exist by simply wishing it to be so.

Having established that the site itself cannot provide the range of facilities by which the development could be made sustainable, then the question is whether these can be provided elsewhere within a 20-minute period of travel by means other than by motorised transport. It is clear that they cannot.

The existing village of Ansty which as previously mentioned is a category 4 settlement. In terms of facilities, it contains a small shop at the petrol station and a village centre which hosts a social club. It is absurd to suggest that either of these could service the day-to-day requirements of 1450 houses.

This leaves the neighbouring settlement of Cuckfield. This is a category 2 settlement which boasts secondary retail, a chemist, a primary school, and a medical centre. However, all of these facilities lie beyond the 20-minute walking time which underpins the whole sustainability argument.

Fairfax have maintained that key facilities such as the primary school and local retail do in fact lie within the 20-minute radius of the development site. They also fail to point out that return journeys double the length of walking time. However, it would appear that

- The distances have been measured in terms of straight lines rather than by the actual (or indeed) proposed access routes.
- The distances have been measured from the northern edge of the proposed development rather than the centre.
- An average walking speed of 3 miles per hour is assumed whereas a more realistic walking speed is no more than 2.5 miles per hour.
- Some pieces of documentation quoting these distances seem variously to conflate kilometres with miles thereby potentially under-estimating actual distances by 5/8ths.
- Distance to the nearest secondary school is omitted from the timings quoted in support of the 20-minute concept.

None of the following existing basic facilities is within a 20-minute walk. Assuming a walking time of 2.5 miles per hour then a more realistic timing is shown in the table below.

Convenience store (NISA)	1.2 miles	28 minutes
Pub (White Harte)	1.1 miles	25 minutes
Church (Holy Trinity)	1.2 miles	27 minutes
Primary School (Holy Trinity) and Cuckfield Medical Practice	1.7 miles	39 minutes
Chemist	1.3 miles	29 minutes
Haywards Heath Railway Station	3 miles	66 minutes
Orchards Shopping Centre	3 miles	67 minutes
Princes Royal Hospital	3.7 miles	83 minutes
Warden Park Academy Secondary School	1.9 miles	41 minutes

As demonstrated above the proposed development cannot be said to be a 20-minute community in terms of walking. This is because such communities are defined by the speed of the slowest form of non-motorised transport.

However, the site fares no better in terms of cycling. Although it is possible to cycle into Cuckfield within a 20-minute timeframe, this would be a hazardous enterprise along either the A272 itself or a narrow path alongside it (less than 1 metres wide in places) which is shared with pedestrians. Both the A272 and the B2036 are national speed limit roads which are unsafe to cross and since these two roads surround the development site on 3 sides, the effect would be to kettle the site's inhabitants within its own boundaries. The addition of signalised crossing points does little to mitigate the dangers of cycling on these roads. The addition of new shared footway/cycleway doesn't provide full mitigation either as this covers only part of the route.

The only reasonably safe cycling and walking route out of the development would be to the east along Copyhold Lane and it is using this route that distances to facilities by bicycle should be more realistically measured. However, this lane is a private road with public access along it being recognised as a bridle path only. As the British Horse Society has pointed out access along such paths for anything other than a horse is by permission not by right. The route (likely to be popular with

Secondary School children travelling to Warden Park) is unlit and therefore unsafe after dark or in the winter. It is therefore not a viable cycling route to consider in planning terms.

The final non-motorised form of transport put forward by Fairfax is by Bus. Quite erroneously, Mid Sussex's initial site selection examination of the Ansty Farm site claims there is an hourly bus service (service 89). This is categorically untrue. 6 days a week there is a single service in each direction between Horsham and Haywards Heath. On 3 days a week (M/W/F), there are 3 additional services per day each way and there is a 1 per day dedicated service each way 5 days a week exclusively for the use of school children.

SCAG contacted the local provider (Compass Bus) to ask if that company would extend the service into the new development and what their attitude was toward the provision of additional services. Their reply is shown below.

Thank you for your enquiry – but I'm afraid most of this information would be commercially sensitive and we would therefore not be in a position to give out any details.

All I can say is that for any new development there is normally a legal requirement to fund a bus service and very few rural bus services are viable without ongoing financial support.

Our existing 89 bus operates under contract to WSCC. It is currently the only regular bus that serves Ansty but we would not want to divert it via the new estate as there is insufficient time and it would make through journeys unattractive to existing passengers.

It is clear therefore that the developer would have to pay for any new bus service to and from the estate and that no bus service would be provided otherwise. Fairfax have provided no details however as to how this would be done and how it would be funded. A bus service would not provide a sustainable option unless it provided regular, convenient, 7-day service connections to Haywards Heath and Burgess Hill towns and their train stations both by day and evenings; and this service was assured for the long term (not merely 3 – 5 years) and from early-stage new housing completions. Fairfax offers no such assurance and admit in their Travel Plan that they expect its use to be very limited (3 – 5% take-up).

To summarise, there is no realistic alternative at this site to the use of motorised transport and the proposed self-contained 20-minute, sustainable community therefore cannot be realised. It is too small of itself to support even a fraction of the facilities that the developer wants to wish into existence and alternative provision is beyond access by any other means.

What is therefore proposed is not a sustainable community but rather a dormitory commuter housing development of a sort that runs counter to national planning principles and policies and has done so since the reforms of the 1940s.

Traffic Implications

Because the proposed Ansty Farm site is non sustainable as a stand-alone settlement, access to and from the site would, as previously shown, primarily be by private motorised transport.

Traffic consultant – Velocity – has interrogated the same TRICS database that is quoted by Fairfax themselves and concluded that the number of additional daily trips that would be made to and from

the site would be of the order of 9133. This is considerably higher than Fairfax's own estimates. The summary data is replicated below.

Time Period	Arrivals	Departures	Totals
07:00-08:00	194	625	819
08:00-09:00	315	738	1053
09:00-10:00	256	328	584
10:00-11:00	238	263	501
11:00-12:00	301	268	569
12:00-13:00	311	279	590
13:00-14:00	299	331	630
14:00-15:00	301	333	634
15:00-16:00	574	373	947
16:00-17:00	563	326	889
17:00-18:00	659	374	1033
18:00-19:00	538	346	884
TOTAL	4549	4584	9133

Velocity are currently expanding on this analysis which will now account for traffic movements occasioned by visits to and from the proposed care home, sports facilities and schools which is likely to be considerable.

Such volumes of traffic onto an already crowded road network is unsustainable as has been evidenced by West Sussex's Saturn transport modelling software provided by the SYSTRA consultancy.

SCAG notes that Fairfax have incorporated modifications to the master plan since our own transport consultant (Velocity) examined these and these changes (which include new junctions) is currently being reviewed by them.

Whilst a critical re-evaluation of these changes will take time and therefore is not included in this paper, Velocity's initial finding is that these will be insufficient to meet the severe impacts along the B2036, A272 and surrounding roads.

It has been noted that Fairfax are proposing 3 new access roundabouts and signalised crossings which require extensive land take stated as being in the ownership of the Highways authority. To make these new junctions safe, it would be necessary to improve the visual splay at each of them which is currently impeded by stretches of woodland/hedgerow and is in part embanked. Such a removal of trees and other vegetation is highly detrimental to wildlife and biodiversity which is one of the developer's boasts that they are protecting and enhancing. Indeed, one of the trees that would need to be removed to achieve safe visual splays at the posted speed limit is classified by their arboriculturist as an English Oak (no. 606) which is of category A2 quality (A being the highest level). This removal of trees and other vegetation does not seem to have been factored into any of the Fairfax biodiversity calculations and other than being referenced in the Designer Responses, the destruction that will be caused to achieve the required visual splays has been conveniently ignored. During the construction of the proposed roundabouts and signalised crossings there will be a significant impact on the surrounding road network and the inevitable chaos that will be caused seems to have been conveniently ignored too.

Quite apart from the removal of vegetation and trees, it may also be necessary to alter watercourses which comes at a risk of flooding and the costly diversion of public utilities.

A further complication lies in the building of the extension to Burgess Hill (Northern Arc or “Brookleigh”). This extension to the north of the existing town will consist of 3 500 houses and the impact on local traffic both during the initial construction period and ongoing thereafter will itself have to be taken into consideration when judging the future capacity of the existing road network.

In conclusion we note that Mid Sussex District Council withdrew this site from the proposed plan partly because of the severe traffic impacts at the various existing and proposed local junctions. The developer has since claimed that in conversations with the County Highways Authority that these impacts have been successfully mitigated. This claim has been denied by Highways who have merely acknowledged (in a letter to us) that conversations have taken place. It would appear that Fairfax have made this claim in order to give the impression that their proposals constitute a “done deal” and that resistance to their plans are futile.

Landscape

The landscape within which the proposed development is taking place has been centuries in the making and is classified as “ancient countryside” characterised by small irregularly shaped fields, thick hedgerows, ancient woodland and steep wooded water courses or ghylls.

It is worth bearing in mind that Mid Sussex District Council in an earlier version of the district plan noted that special protection should be afforded to the “countryside setting on the edge of the High Weald AONB and in particular to safeguard the landscape to the south of Cuckfield that is considered to be of a similar quality to the AONB itself”.

The following assessment has been provided by renowned landscape architect – Louise Hooper and is quoted at length below.

“The proposed development would have a major adverse impact on the landscape fabric and landscape character of the site and its surroundings, including the setting of the High Weald National Landscape and the HWNL itself. The proposed housing development would have a major adverse impact on Upper and Lower Copyhold Stream Woodlands and Ghyll Woodland, the ancient woodland within the site and adjacent to it, as well as numerous ghyll woodlands which are such a feature of the area. It would have a major adverse impact on the biodiversity of the site and its surroundings, including the soils, the water courses and ecological habitats. The proposed road crossing of the Copyhold Stream would impact on the soils, Ancient Woodland, cause light and noise pollution and there would be a risk of polluted road run-off infiltrating the water course. There would be significant loss of BMV agricultural land. The proposed development would have a moderate adverse impact on the nearby Cuckfield Conservation Area, which includes the Grade I listed Cuckfield Church, affecting its setting, character, and its outlook”.

“The landscape effects of the proposed development would impact adversely on the entire site, with the degree of impact being major adverse or moderate/ major adverse for the majority of the site. The proposals would damage, degrade and destroy large swathes of valued and sensitive landscape including ancient woodland, ghyll streams and historic field boundaries; they would be completely out of scale and incompatible with the existing settlement pattern, landform, scale and landscape pattern. The landscape effects of the proposed development on the landscape outside the site boundary would have a major adverse impact on the High Weald Area of Outstanding Natural Beauty, one of the best surviving medieval landscapes in northwest Europe, on the South Downs National Park and on the Cuckfield Conservation Area. The proposed development would have an adverse impact on the historic settlement pattern of Ansty and Cuckfield, affecting the setting and outlook of listed buildings and heritage features such as Cuckfield Park, Mackerells and the Old Place.

Light pollution and a lack of dark skies are key characteristics giving rise to urban rather than rural surroundings. Light spill from security lights, street lights and floodlights can spread for miles and blurs the distinction between town and countryside. The visual effects of the proposed development would impact adversely on local residents, walkers, cyclists and horse riders.”

And with regard to the Parkland Reserve.

“The landscape effects of the proposed Parkland Reserve would impact adversely on the site, with the degree of impact ranging from major adverse for Copyhold Stream Woodland to the south of the site to minor adverse for ridge-top playing fields to the north of the site; the landscape effects for the rest of the site, would be moderate adverse. At Copyhold Stream Woodland, new footpaths and maintenance access would impact on the linear stretch of ghyll woodland which includes Ancient and Semi-natural Woodland. Enabling works such as tree and woodland clearance, engineering works and construction would impact on the soils and other important landform features and on the water course of Copyhold Stream, resulting in a major adverse landscape impact.”

“The landscape effects of the proposed development would have a moderate to major adverse impact on the High Weald National Landscape, one of the best surviving medieval landscapes in northwest Europe. Objectives of the High Weald AONB Management Plan at risk from this proposal include:

- G1 To restore the natural function... of water courses...
- G2 To protect and enhance soils...and other important landform features
- W1 To maintain the existing extent of woodland and particularly ancient woodland
- W2 To enhance the ecological quality and functioning of woodland at a landscape scale.

“The visual effects of the proposed development would impact adversely on local residents, walkers, cyclists and horse riders. The impact on Close Neighbours would be moderate adverse for Old Mill Cottage, and minor adverse for Pondtail Cottage, properties in Deakes Lane and for Cuckfield Park. LHLA strongly recommends that this site is not developed for housing and a Parkland Reserve due to the major adverse impacts on the High Weald National Landscape, a valued and sensitive landscape, and due to the moderate to major adverse impacts on local residents, close neighbours, walkers and cyclists”

Biodiversity.

In the supporting documentation submitted by Fairfax, it is made clear that the proposed “Country Park” or “Parkland Reserve” is designed to offset the ecological damage that the applicant admits will be caused on the development site itself.

This runs counter to best planning practice and the new guidelines to be published shortly that state that net bio-diversity net gain should be demonstrated on the same site and not offset in this manner. The two sites are not connected except by ownership.

In any case it is hard to see how the existing rural landscape with its rich natural habitats, ancient woodlands and ghyll streams can be improved upon. It lies within the High Weald National Landscape (formerly AONB) and already has several PROWs running across it. Both from an ecological and landscape perspective it is shown to be of exceptionally high quality.

The Fairfax plans to “improve it” are vague and contradictory. On the one hand the “park” is touted as a recreational facility for the new development. On the other, it is to have restrictions placed on

access to enable some sort of re-wilding to take place. Hence, we have “interpretation boards”, a cycle path which tears through ancient woodland alongside enclosures populated with long horned cattle and hides lifted it would seem straight out of Knepp Park. It is an attempt to simultaneously tick two boxes and manifestly failing in both.

SCAG has undertaken no independent study into biodiversity net gain across the two sites but notes that the Sussex Wildlife Trust (who have done so) have been particularly scathing in their assessment of this “Parkland Reserve”.

Conclusion.

It must be stressed that SCAG have not had time in the 6 weeks just before Christmas to respond in detail to the tsunami of documentation that the applicant has submitted in support of this application. We will in the next few weeks be submitting further detailed responses.

We do believe however that the core objections to this development are

- The speculative nature of the development which runs counter to the land use and environmental objectives of the current and proposed district plans.
- The inherent unsustainability of building a dormitory suburb which will always be dependent on services and employment opportunities elsewhere.
- The enormous impact on the local roads network caused by housing being built miles away from where local service provision is based.
- The sheer destruction implied by imposing an essentially suburban housing estate on an ancient and precious landscape.
- The impossibility of mitigating biodiversity loss in one place by passing it off as being added to a place where it already exists.

SCAG as a group and as individuals are not opposed to sustainable planned development in line with your current District Plan, and neither are the people of Ansty and Cuckfield. Both places have over the years been greatly expanded by small scale organic development that have been supported by both Parish Councils and local people within the context of their own neighbourhood plans approved by democratic local referenda.

In addition, the major expansion of Burgess Hill at Brookleigh, which at the time was within the Ansty & Staplefield parish boundary, was accepted by the local community as being necessary to provide a solution for the perceived housing need.

By contrast the Ansty Farm site is unwanted, unneeded, and wholly inappropriate. It addresses a housing shortage that does not exist by tearing up the landscape fabric which has been a thousand years in the making.

We earnestly urge Mid Sussex to reject the Fairfax application and to ensure it remains out of the new District Plan.

Simon Stokes (Chair SCAG).