



The countryside charity
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Mr Martin Dale, Planning Officer,
Mid Sussex District Council

26 January 2026

By e-mail to: planninginfo@midsussex.gov.uk

Dear Mr Dale,

MSDC Planning ref: DM/25/2223 - Land near St Hill Manor, Saint Hill Road, East Grinstead

I am writing to you on behalf of CPRE Sussex, the Sussex countryside charity. I am afraid that we have only recently become aware of this application to change the use and construction works on fields adjacent to Saint Hill Manor, a grade II listed building within the High Weald National Landscape (HWNL), one of the country's most precious landscapes that enjoys, in planning terms the highest status of protection from inappropriate and large scale development.

This development proposal does amount to inappropriate development, so we would encourage you to refuse this application as being incompatible with your current District Plan and with your duty under s.85 (as amended) of the Countryside & Rights of Way Act 2000 to seek to further the purposes for which the HWNL was so established.

The creation of hard surfaced parking for approx 700 cars and various other ground and construction works involves major, permanent, changes to the currently pastoral nature of the land in question. It is no small-scale development. It is in our view plainly incompatible with your Plan policy DP16's requirement that any development within the HWNL must conserve and enhance its natural beauty and have regard both to the objectives of its Management Plan and to the specific factors set out in DP16. It is not credible to claim that the development proposal will enhance the HWNL's natural beauty. We note that even the applicant's own LVIA admits that the development would involve a "moderate adverse landscape change", rather than positive enhancement.

Whilst we note that Place Services have highlighted the fact that the site is within the HWNL has implications for your decision on this application, we strongly urge you to take advice from the HWNL Planning Adviser if you have not already contacted her. She has HWNL-specific expertise on the degree of significance, and practical implications, of the proposals in its site-specific context, and on the various landscape, historical, geological, Management Plan etc factors that are material to your determination of whether or not they constitute major development for NPPF para 190 purposes having regard to your Council's December 2020 assessment criteria.

If you do conclude that major development would be involved – and the scale of the urbanizing effect of permitting a 700 vehicle car park on open long-undisturbed grassland of considerable plant diversity immediately adjacent to ancient woodland strongly suggests that it would meet your criteria for major

development – then NPPF para 190 explicitly requires the application to be rejected as there are no exceptional circumstances or public benefits to require otherwise.

Even if you were to conclude that the proposal for a mega car park does not involve major development, it must be considered in the context of the great weight that must be given to the conservation and enhancement of the HWNL's landscape and natural beauty, and to the limited scale and extent, and locational sensitivity of the development involved.

Other factors that militate against approving this application include:

1. It offers very limited public economic or social benefits to counteract its serious environmental downsides. It offers no new housing or employment or business generation opportunities, and virtually no public realm or infrastructure enhancements;
2. As pointed out by your Conservation Officer, it will adversely affect the setting of Saint Hill Manor, a designated heritage asset, contrary to your Plan policy DP34, a fact to which significant weight must be given;
3. The proposal is incompatible with your District Plan policy DP12 (Protection & Enhancement of the Countryside);
4. The proposal is incompatible with a number of policies in the East Grinstead Neighbourhood Plan, including policies EG1, EG5 and EG6; That Plan does not support the expansion of parking facilities at Saint Hill Manor;
5. Saint Hill Manor already has extensive on-site car and coach parking. The additional large car parking and other works involved are only required for one main private event a year. The adverse impacts on the HWNL and its ecology will be every day and permanent;
6. Whilst the proposed new car park will offer the potential benefit of relief overflow parking space to the users of the adjacent sports facilities - if and for so long as the ICS is willing to permit such usage - we question how significant a benefit that would be: we note that the East Grinstead Sports Club had applied to you a year or so ago to expand its own car park, but had then withdrawn that application. That suggests to us that the EGSC has available land to resolve its own much more modest extra car parking needs if this application is turned down;
7. Saint Hill Road is a narrow road, with no pavement or verge for significant parts of its length. It cannot provide safe walking or cycling in the direction of Turners Hill Road (a factor ignored in the applicant's Travel Plan). A planning proposal that, in practice, serves only to encourage additional vehicular traffic is to be deplored. It operates contrary to national planning policy aims to reduce car dependency. Being neither sustainably located nor necessary development, it is also incompatible with your District Plan policy DP21 as it does nothing to minimise the need to travel. The applicant, for its major events, should be aiming to increase its guests' use of public transport services coupled with busing them in from local train stations as a far more sustainable alternative to encouraging them to drive to and park at their estate.

It seems to us that there is a strong case to be made that the adverse impacts on the HWNL and, potentially the application of NPPF para 190, are, in themselves, likely to be sufficiently significant as to provide a strong reason for rejecting this application; and hence disapplying the tilted balance that NPPF para 11d) would otherwise require you to engage in evaluating the proposals' pros and cons.

Whether or not you share that view, we consider it plain that the serious adverse impacts of the applicant's scheme significantly and demonstrably outweigh its puny public benefits, particularly its incompatibility with the policies within the NPPF, your own District Plan and East Grinstead's Neighbourhood Plan that are designed to conserve and enhance the HWNL, and to safeguard designated heritage assets and the countryside,.

We further question whether a sufficiently sound case can be made that approving this application would be compatible with your Council's new legal duty under s.85 of the CROW Act 2000 to seek to further the purposes for which the HWNL was designated as a national landscape. You will doubtless have regard to (seek to further the purposes of?) the guidance notes issued both by DEFRA¹ and by the National Landscapes Association² on the application of this new duty in this case.

A decision made in accordance with your adopted Plan would, in our opinion (but without knowing the views of the HWNL Planning Adviser), require rejection of this planning application.

Yours sincerely



¹ <https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>

² https://national-landscapes.files.svdcn.com/production/assets/images/Documents/Briefings/250509_NLA-s85-Briefing-Note-for-RAs_Final.pdf?dm=1747041360