

---

**From:** Brook, Laura <laurabrook@sussexwt.org.uk>  
**Sent:** 20 December 2023 08:05  
**To:** planninginfo  
**Subject:** Sussex Wildlife Trust - Holding Objection - DM/23/2866 | Outline planning application (All matters reserved except for access) for the redevelopment of land to the east of Ansty to create a new Garden Community.....  
**Attachments:** SWT holding objection DM.23.2866.pdf

You don't often get email from laurabrook@sussexwt.org.uk. [Learn why this is important](#)

F.A.O – Case Officer – Stephen Ashdown

Please find attached the Sussex Wildlife Trust Holding Objection – to application - **DM/23/2866** | *Outline planning application (All matters reserved except for access) for the redevelopment of land to the east of Ansty to create a new Garden Community.....*

Given the timing of this application we have been unable to consider this applications ecological information in full, however we do wish to submit a holding objection with high level ecological points. We hope to provide further commentary in the new year but recognise that this might not be considered as it will be after the advertised deadline of December 31<sup>st</sup>.

Kind Regards,  
Laura Brook  
Conservation Officer



Otter © Stephen Bray

Visit us at: [www.sussexwildlifetrust.org.uk](http://www.sussexwildlifetrust.org.uk) or connect with us on:

 [facebook.com/SussexWildlifeTrust](https://facebook.com/SussexWildlifeTrust)  [@SussexWildlife](https://twitter.com/SussexWildlife)  [@SussexWildlifeTrust](https://instagram.com/SussexWildlifeTrust)

Sussex Wildlife Trust is a company limited by guarantee under the Companies Act. Registered in England, Company No. 00698851. Registered Charity No. 207005. VAT Registration No. 191 305969. Registered Office: Woods Mill, Henfield, West Sussex BN5 9SD. Telephone 01273 492630. If you need to print this email, please recycle after use.



**Sussex**  
Wildlife Trust

F.A.O  
Stephen Ashdown – Case Officer

Contact: Laura Brook  
E-mail: [swtconservation@sussexwt.org.uk](mailto:swtconservation@sussexwt.org.uk)  
Date: 20 December 23

Dear Mr Ashdown,

**DM/23/2866 | Outline planning application (All matters reserved except for access) for the redevelopment of land to the east of Ansty to create a new Garden Community, comprising of the erection of up to 1,450 homes (including 30% affordable housing), up to 90 residential care units (C2 class), a primary school, a SEND school, health hub, sports facilities including all weather hockey pitches and tennis centre, allotments, retail, community and employment uses together with ancillary and associated development including new and enhanced pedestrian/cycle routes, open spaces, and landscaping | [Land East Of Ansty Way Cuckfield Bypass Cuckfield West Sussex \(midsussex.gov.uk\)](https://www.midsussex.gov.uk).**

Sussex Wildlife Trust (SWT) is aware of the above application.

SWT have been unable to look at the full ecological detail of the application at this stage. However, given the deadline for comments falls over the Christmas period we felt it necessary to submit a **holding Objection** to this application.

Having had an initial look at the application we wish to draw your attention to the following points.

The application is coming forward on a site which is not allocated in the Mid Sussex Local Plan. SWT supports a plan led process and are concerned that an outline application of this scale that is not allocated has the potential to impact ecological networks and is contrary to section 179 of the National Planning Policy Framework 2023.

We highlight that the proposed development is directly adjacent to Great Wood & Copyhold Hangar Local Wildlife Site (LWS). There is a footpath connecting the proposed development site with Great Wood and Copyhold Hanger LWS. The development would therefore result in direct impacts to the LWS in the form of increased recreational pressure and associated impacts including disturbance, increased dog fouling and litter.

As a part of the Environment Act 2021 Local Nature Recovery Strategies are being formulated and LWS will be integral to those strategies. We ask Mid Sussex District Council to ensure that their consideration of this planning application considers the wider impacts to ecological function in this location.

Woods Mill, Henfield, West Sussex, BN5 9SD  
01273 492 630 | [enquiries@sussexwt.org.uk](mailto:enquiries@sussexwt.org.uk) | [sussexwildlifetrust.org.uk](https://sussexwildlifetrust.org.uk)

Whilst we recognise that the Mid Sussex Local Plan is undergoing a review process with the Regulation 19 consultation imminent in the new year. The current Mid Sussex Local Plan does contain biodiversity policy (DP38) which clearly stipulates that;

*Biodiversity will be protected and enhanced by ensuring development:*

*Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated **Sites of Nature Conservation Importance**, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.*

The policy refers to Sites of Nature Conservation Importance, the name by which Local Wildlife Sites use to be referred to.

We specifically note that the application site contains areas of ancient woodland. We highlight that the NPPF 2023 is clear in section 180, that

*When determining planning applications, local planning authorities should apply the following principles:*

*c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*

Sussex Wildlife Trust is concerned that loss or deterioration to ancient woodland has the potential to occur both directly and indirectly to this irreplaceable habitat. For example, the application mentions "All ancient woodland will be fenced to prevent public access" Sussex Wildlife Trust are concerned that this may not only be ineffective but that it introduces potentially unnecessary barriers to wildlife.

Even though not all areas of the woodland on the site are currently classified as ancient woodland, the woodland blocks are connected and will work collectively to provide wider ecological functions.

Mid Sussex Local Plan contains policy DP37: Trees, Woodland and Hedgerows. This policy covers many elements but also makes clear that;

*Trees, woodland and hedgerows will be protected and enhanced by ensuring development:*

- *does not sever ecological corridors created by these assets.*

In general terms SWT are concerned that this application could induce;

Construction impacts:

- direct harm from pollution, noise, lighting, vibration and the movement of people and construction machinery
- soil compaction
- habitat severance caused by construction works on-site
- habitat destruction during site clearance activities

Post construction/operation impacts:

- permanent habitat loss;

- chronic disturbance from noise, lighting, vibration and the movement of people, vehicles onsite; risk of traffic collisions.
- increased recreational use of habitats on site and adjacent habitats, including Great Wood & Copyhold Hanger LWS, leading to soil compaction, human/dog disturbance, littering, physical damage to trees;
- increase in numbers of people and pets on site.

SWT are aware that a further application has been submit which seem to address delivery of off-site Biodiversity Net Gain (BNG) to support the above application.

**DM/23/2867 | Change of use of farmland and woodland to parkland reserve to include public access and instigation of long-term management and rewilding regime, including establishment of pedestrian and cycle tracks, with new pedestrian and cycle access points off Cuckfield Road to the south and Staplefield Road to the north. Proposals to include the addition of two wooden viewing platforms and two hides. Sports pitches at Beech Farm Field to remain in sports use. | Land East Of Ansty Way Cuckfield Bypass Cuckfield West Sussex**

We have not looked at the detail of this application as yet, but we want to highlight to Mid Sussex District Council that separate to the mitigation hierarchy the draft planning policy guidance to support BNG was published on the 29th November 2023, this makes it clear that there is a Biodiversity Net Gain Hierarchy, which means that developers must demonstrate;

*The biodiversity gain hierarchy means the following actions in the following order of priority:*

- *avoiding adverse effects of the development on onsite habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than six;*
- *so far as those adverse effects cannot be avoided, mitigating those effects;*
- *so far as those adverse effects cannot be mitigated, habitat enhancement of onsite habitat;*
- *so far as there cannot be that enhancement, creation of onsite habitat;*
- *so far as there cannot be that creation, the availability of registered offsite biodiversity gain;*
- *so far as that offsite habitat enhancement cannot be secured, purchasing biodiversity credits.*
- *Developers are encouraged to follow the Biodiversity Gain Hierarchy from the earliest stage possible when selecting a site and considering development proposals.*

*Local planning authorities must take into account the Biodiversity Gain Hierarchy when considering whether the biodiversity objective has been met and when determining whether to approve the Biodiversity Gain Plan.*

*Paragraph: 007 Reference ID: 74-007-2023*

We recognise that Biodiversity Net gain requirements of the Environment Act 2021 are not mandatory until a date to be determine by parliament in Jan 2024. The applicant should be providing information to the satisfaction of the LPA that there approach is addressing the provision of BNG onsite ahead of off-site delivery.

Yours sincerely,

Laura Brook  
Conservation Officer  
Sussex Wildlife Trust