

**Town and County Planning Act 1990
Section 78 (As Amended)**

**Addendum
to the
Planning Statement of Common Ground**

Prepared between:

**Woolf Bond Planning Ltd
for
Fairfax Acquisitions Limited and The Norris Family,
and
Mid Sussex District Council;
and
Ansty and Staplefield Parish Council and Cuckfield Parish Council**



**Land East of Ansty, Cuckfield,
West Sussex, RG17 5AG**

**PINS Ref: 6002030
LPA Ref: DM/23/2866
WBP Ref: 9161**

16th June 2026

1. The Agreed Position

- 1.1. This Addendum to the Planning Statement of Common Ground (“SoCG”) (**CD7.1**) has been prepared by (i) Mr Steven Brown (of Woolf Bond Planning Ltd), on behalf of the Appellant, Fairfax Acquisitions Ltd and The Norris Family, (ii) Mr Steven Ashdown on behalf of Mid Sussex District Council (“MSDC”); and (iii) Mr Mark Connell (of Sphere25 LLP) on behalf of Ansty and Staplefield Parish Council and Cuckfield Parish Council (The Rule 6 Party “R6P”).
- 1.2. This Addendum SoCG confirms the weight attributed to the harms and benefits by the Appellant, MSDC and the R6P, reflecting the agreement in Section 5 of the Planning SoCG (**CD7.1**). The Rule 6 Party sets out the relative weights at paragraph 6.2 of Mr Connell’s Proof of Evidence (**CD10.1**)
- 1.3. The weight attributable to the harms and benefits is included in Table 1 below, on which the parties will rely when giving oral evidence.

Table 1: Weight Attributable to the Harms and Benefits

	Appellant	MSDC	R6P
Harms	Weight	Weight	Weight
Conflict with the Development Plan	Limited	Significant	Significant
Landscape and visual harm	Moderate	Significant	Significant
Harm to NL and its setting	No harm	Great	Great
Coalescence / settlement identity	No harm	Significant	Significant
Loss of agricultural land	Limited	Limited	Limited
Loss of trees	No harm	Limited	Moderate
Heritage (less than substantial harm)	Great weight	Great weight	Significant*
Prematurity	No harm	Substantial	Substantial
Benefits	Weight	Weight	Weight
Provision of up to 1,450 market homes	Substantial	Substantial	Substantial
Provision of up to 435 affordable homes	Substantial	Substantial	Substantial
Provision of up to 30 custom/self-build homes	Substantial	Substantial	Substantial
Provision of 90 x C2 care units	Substantial	Substantial	Substantial
Economic Benefits (job creation/local expenditure)	Significant**	Significant	Moderate
Provision of land for education purposes	Significant	Significant	Significant
Provision of sports facilities	Significant	Significant	Moderate
Provision of a health hub	Significant	Significant	Neutral
Biodiversity Net Gain	Significant	Significant	Moderate
Enhanced connectivity, footpaths, cycle links and bus service enhancements	Significant	Significant	Limited

*The Rule 6 Party is cognisant of Para 212 of the NPPF and is attributing harm, which all parties agree is less than substantial.

** *This weight corrects Table 4 of Mr Brown's Proof, which reflects Mr Brown's findings at paragraph 4.78 of his evidence.*

- 1.4. In addition to the matters contained in Table 1 above, Mr Brown (for the Appellant) gives limited weight to the conflict between the Appeal Scheme and the emerging Local Plan (paragraph 4.163 of his evidence (**CD8.1**)).
- 1.5. The R6P's position is that the weight to be attached to the policies of emerging plan are limited. The scale of development proposed would conflict with the emerging plan. The extent of conflict would be substantial (paragraphs 4.34 and 4.35 of Mr Connell's evidence refer (**CD10.1**)). The R6P agree with MSDC that the proposal would be premature to the emerging plan.
- 1.6. MSDC has not identified the weight that it attributes to the emerging local plan or its policies in its written evidence. However, MSDC's position (CS evidence paragraph 5.1A) is that granting permission for the appeal development would be premature and would undermine the plan-making process by pre-determining decisions about the scale, location and phasing of new development.

Signatures

On behalf of the Appellant:

Signed:...*Steven Brown*...

Date: 16th June 2026

Name: Steven Brown BSc Hons DipTP MRTPI for Woolf Bond Planning Ltd obo Fairfax Acquisitions Ltd and The Norris Family

On behalf of Mid Sussex District Council

S. Ashdown

Signed:

Date: 16th June 2026

Name: Steve Ashdown BA (Hons) DipTP MRTPI for Mid Sussex District Council

On behalf of the R6P:



Signed:

Date: 16th June 2026

Name: Mark Connell Bsc Hons DipTP MRTPI for Sphere25 obo Ansty and Staplefield Parish Council and Cuckfield Parish Council (The R6P).
