



Summary Planning Proof of Evidence

Mark Connell

Land East of Ansty Way, Cuckfield Bypass, West Sussex, RG17 5AG

Planning Inspector Reference 6002030

Contents

1. Summary Proof of Evidence3

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Declaration

- 1.1 I hold a Bachelor's of Science (with Honours) in City and Regional Planning and a Diploma (Distinction) in Town Planning. I am a chartered member of the Royal Town Planning Institute (RTPI) with over 20 years of experience. This has included instructions working for a range of housebuilders, housing associations, land promoters and local authorities during my career.
- 1.2 I can confirm that my evidence to this inquiry is provided in accordance with the guidance of my professional institution. The opinions expressed are my true and professional opinions.

Scope of Evidence

- 1.3 My evidence will focus on matters of planning policy and address the overall planning balance. I will explain how the location and scale of development conflicts with the adopted plan, emerging plan and national guidance. Whilst I agree that the Development would deliver benefits, they do not outweigh the harm that would be caused by the Development when considered in the planning balance. There are strong reasons for refusal of the appeal, having regard to paragraph 11 of the NPPF.
- 1.4 As requested by the appellant, I have considered both the original scheme the subject of the planning application and the revised scheme submitted during the course of the appeal [CD15.1 to CD16.9]. I reach the same ultimate conclusion in respect of both schemes, albeit that there are nuances related to the weight attributable to education and residential care aspects between the original and revised proposals.

Context

- 1.5 The site is situated in a sensitive rural location. There are both natural and built heritage assets immediately surrounding the site. This includes the High Weald National Landscaped and a number of listed buildings. The population of Ansty is small, with limited services. It is poorly served by Public Transport. The village of Cuckfield lies to the east, with a significant extent of the settlement within the Cuckfield Conservation Area. Both Settlements have origins from the Medieval Period.

Planning Policy

- 1.6 The proposal is a departure from the Mid Sussex District Local Plan, The Ansty, Staplefield and Brook Street Neighbourhood Plan and the Cuckfield Neighbourhood Plan. The proposals do not accord with the emerging plan, which is timetabled for adoption by the end of 2026.
- 1.7 The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development. A tilted balance may apply if the Council cannot demonstrate a 5 year land supply. However, this is subject to particular areas of importance not providing a strong reason for refusal. National Landscapes are amongst such assets. The setting of the National Landscapes are relevant to the application of this policy.

Main Issues

- 1.8 Four main issues were identified as being of particular importance to the appeal. These relate to the character and appearance off the area, including the High Weald National Landscape, the sustainability of the location, infrastructure provision and the planning balance. A further issue relating to “prematurity” was also identified following the Councils progression of the emerging plan and analysis of additional housing sites. In considering these issues, a number of harms have been identified which are to be weighed up against the proposal.

The Planning Balance

- 1.9 I have undertaken a balancing exercise weighing up the benefits of the scheme with its harms. I come to the following balance.

Benefits	Weight
C3 Housing	Substantial
C2 Care Home	Moderate ¹
Education	Significant ²
Local Centre & Health	Neutral
Open Space & Recreation	Moderate
Bus Service	Limited
Construction Jobs	Moderate
Biodiversity Net Gain	Moderate

Table 1: Planning Benefits & Weight

Harms	Weight
Unsustainable Pattern of Development	Significant
Impact on Setting of HWNL	Great
Other Landscape Harm	Significant
Perceived Coalescence	Significant
Loss of Best & Most Versatile Farmland	Limited
Tree Loss	Moderate
Heritage	Significant

¹ Based on Alternate Plans

² Based on Alternate Plans

Prematurity to the Local Plan	Substantial
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Table 2: Planning Harms & Weight

Conclusion

- 1.10 The proposals conflict with the adopted development plan. They do not accord with numerous policies, but crucially they do not accord with the development plan when read as a whole. This position is accepted by the appellant.
- 1.11 National Policy sets out a presumption in favour of sustainable development. The appellant takes the position that a “tilted balance” in favour of the application exists because of the Council’s lack of a 5-year land supply. No issue is taken over the Council’s strong housing delivery record. Furthermore, a replacement local plan is due to be in place before the end of 2026.
- 1.12 In my judgement the tilted balance is not engaged. This view is reached as the proposals will harm the setting of the High Weald National Landscape, and the level of harm provides a strong reason for refusal.
- 1.13 In my view, even if the tilted balance is engaged, the adverse impacts of the proposal significantly and demonstrably outweigh the benefits of the proposal.
- 1.14 It is on this basis that I consider that the appeal should be dismissed.

Mark Connell
 Sphere25 LLP
 22 May 2026