

My name is Michael Brown. I am speaking on behalf of the Sussex branch of the charity, the Campaign to Protect Rural England. CPRE has been successfully championing the English countryside and its rural communities since 1926, exactly 100 years ago.

I should make it clear at the outset that, unlike the other two Mr Browns here, I am not a qualified planning lawyer or consultant, and claim none of their expertise.

Mid Sussex is a rural district. Ansty and Cuckfield are two and distinct rural communities.

CPRE has, from the outset, opposed the appellant's wish to turn much of the countryside gap between those two villages into a large housing estate. I hope that you will find time to read the detailed submissions that CPRE made to the Council on 28<sup>th</sup> December 2023 and 25<sup>th</sup> June 2025 in advance of its decision to refuse planning permission for the main development.

The core of CPRE's argument has always been that Ansty Farm is not a sustainable site for the large development proposed, and fails the NPPF's and District Plan's minimum requirements for what is required to deliver a sustainable development.

It will be clear to anyone reading the NPPF that locational sustainability is at the core of its planning policy aims to ensure sustainable development. It has been pointed out to me that even when the tilted balance is engaged, which I know the Parish Councils will forcefully argue that it is not in this case, the tilted balance nonetheless still requires planning decisions *"to have particular regard to key policies for directing development to sustainable locations"*. So even when there is a 5 year land supply shortfall – in this case a temporary shortfall that the new District Plan is on advanced track to resolve when adopted – a new housing development scheme still has to be the right one in the right place. That is not the case here.

We, CPRE, say that Ansty Farm cannot be a sustainable location based on the aggregation of a series of adverse impacts, some of them individually substantial and significant, some less so; but when considered cumulatively and overall, they aggregate to a position where, in CPRE's view, they outweigh the benefits of the additional housing that the appellant's scheme would provide, and outweigh them significantly.

As we see it, those downsides include

1. The adverse impacts on the High Weald National Landscape and its Management Plan resulting from the site's location adjacent to and within its setting. To which must be added the additional and different adverse impacts resulting from the changes that the appellant proposes to make to the Beechy Bottom site within the High Weald itself if this appeal were allowed;
2. The loss of a large swathe of important landscape that is similar in character and quality to that of the adjacent High Weald and that the Council's expert described as being *"important at both a National and European level for its intimate agricultural character, tranquillity and beauty"*;
3. The loss of Ansty's distinct identity as it is overwhelmed by the new settlement;
4. The coalescing impact on the distinct villages of Ansty and Cuckfield;

5. the loss of good farmland, including some (for Sussex relatively rare) best and most versatile soil, at a time when a premium is being put on increasing our agricultural self-sufficiency; if we succumb time and time again to the same argument that it's not a lot of land or soil, sooner or later we will find that not a lot is all we have;
6. The unmeasured but adverse climate change impacts resulting from the loss of CO<sup>2</sup> absorbing woodland and green space;
7. The further fragmentation and isolation of pockets of ancient woodland, making life much harder for wildlife to travel;
8. The relative remoteness of the location, which renders the residents very largely and unsustainably car dependent. This is a crucial consideration. Car dependency is to sustainability what carcinogenic diesel fumes are to public health. Distance and infrastructure deficits together make walking or safe cycling to essential facilities such as supermarket, train station, surgery, social or cultural centre impractical. The practical value of other proposed active travel measures is negligible. The appellants have admitted as much in their own Framework Travel Plan. At para 10.5 the appellants themselves estimate the overall impact of their bus and other active travel measures as achieving a minimal 3% reduction in car use within 3 years of occupation and 5% thereafter;
9. the site's relative remoteness with its very limited internal resources would also result in a non-inclusive settlement from the standpoint of those who are elderly, disabled or otherwise disadvantaged.

We think, Madam, that you need to be sceptical of the appellant's transport evidence on this issue. There is a clash between desk-based theory and hard reality. We would encourage you, as part of your forthcoming site visit, to walk from the site to the Orchard Centre in Haywards Heath to judge the distance and practicality of it for yourself. As you do so, please look at how you could have cycled that route safely without using the A272 roadway itself or narrow pedestrian pavements. Ask yourself how keen you would be to do that journey on a rainy winter's day or with the family's shopping to bring back.

Also please look for yourself at how kids will safely get to and from Warden Park, especially coming home on winter afternoons. Is there enough lighting? How safe will it be to cross the main road at what is likely to be one of its busiest times of the day, and may be in the half dark?

And ask yourself how car pooling could work for the many new residents who will need to use Haywards Heath train station to get to work (or play). Is car sharing practical? Can the pool car be left at the station all day; who will pick it up, who will pay the car park fee, and how will anyone not returning at the same time get home in the evening after the bus service becomes minimal? Car pooling is nice theory, but its practical usability (subsidised or otherwise) in a rural context is extremely limited.

CPRE's extensive experience of large scale development in rural locations that were "sold" as sustainable sites is that they don't ever deliver on that promise in practice. A joint CPRE/Transport for New Homes study in 2020 reviewed in detail how successful in terms of locational sustainability the development of 20 new garden village communities of the same type being proposed in this application had turned out. This is the only on-point study of the subject that I know of. Its findings *"Our conclusion from our visits and research, is that there is an enormous gap between the garden community visions presented by government, consultants and local councils, and the developments*

*likely to be built in reality. The problem centres we think, on building in the wrong location and around the wrong kind of transport. The two problems are of course, interrelated.”<sup>1</sup>*

The Town and Country Planning Association’s “20 minute Neighbourhood Guide”<sup>2</sup> also tells us that a self-sustaining community cannot be successfully established outside existing urban areas; it therefore gives no succour at all to the case for the sustainability of the proposed Ansty garden community.

Of course the building of a lot of new homes and other facilities offers Mid Sussex a significant benefit. The professionals will be arguing before you over the degree of that significance in the context of the advanced stage of the new District Plan in the days ahead. CPRE simply asks you to give great weight to the overall unsustainable nature of the site’s location, and the serious long term implications for the established and new communities involved of permitting a development scheme that would destroy all that is, without being able to deliver in its place a sustainable estate. It would be an estate built in the wrong place, and the need for it would disappear on the adoption of the new District Plan which aims to deliver enough new housing earlier than Ansty Farm could do.

This would not be the first example in Sussex of an appeal against a 5 year housing land supply-deficient Council’s refusal of planning permission being rejected on locational non-sustainability grounds. If you were to say no to this appeal, you would be travelling well-trodden ground. The best known recent example is the 2025 Goring Gap appeal<sup>3</sup> involving a proposed 475 home development in a sensitive location within the setting of the South Downs National Park.

Even closer to the current facts is the decision by another appeal inspector in June last year to turn down an appeal by Bellway Homes against a decision by Horsham DC to refuse permission for a 250 home development just outside Thakeham village<sup>4</sup>. The Inspector’s refusal was principally centred around her conclusion that the site’s car dependency meant that the development would not be sustainably located, and that this was a much more adverse impact than the housing benefit on offer, notwithstanding the application of the tilted balance. There weren’t even the additional ingredients we have in this case of the adverse impact on the High Weald or a potentially valued landscape. As you listen to the lawyers and experts argue their points in the coming days, I would respectfully ask you to bear in mind the rationale of your fellow appeal inspector in that case.

I may not be a planning professional; but I am someone who, like all of us at CPRE, cares deeply about finding the right balance between a culture of “build, baby, build” and “not in my back yard”. My own simple conclusion to achieve the sustainability goal of meeting the needs of the present without compromising the ability of future generations to meet their own needs is that locationally unsustainable developments – which this one is – should be rejected. You can never satisfactorily resolve today’s housing shortage by building for-ever housing estates in the wrong place.

Thank you, Madam. I would be happy to provide references for the two studies and two recent appeal cases that I have referred to.

Endnote references.

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- <sup>1</sup> 2020 Transport for New Homes/ CPRE joint report called “Garden Villages and Garden Towns: Visions v Reality” <https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf>
  - <sup>2</sup> <https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/>
  - <sup>3</sup> Worthing BC **Appeal** Ref: APP/M3835/W/21/3281813 (2025).
  - <sup>4</sup> Planning Appeal Decision 13 June 2025, Ref: APP/Z3825/W/24/3350094 (Horsham DC).