

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA11

ID: 813

Response Ref: Reg19/813/1

Respondent: Dr J Thring

Organisation:

On Behalf Of: The Rowfant Society

Category: Resident

Appear at Examination? ✓

Name	JAMES THRING
Organisation	Rowfant Society
Address	[REDACTED]
Phone	[REDACTED]
Email	[REDACTED]
Name or Organisation	Rowfant Society
Which document are you commenting on?	Site Allocations DPD
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Unsound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Unsound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	<p>The Site of greatest concern to the local community is Huntsland Farm, an area of valuable agricultural land and woodland of 60acres (25ha) destined for 300 houses and associated facilities.</p> <ol style="list-style-type: none"> 1.The size is out of proportion to the village of Crawley Down. 2.The land is vital for farming, as Brexit will increase food import prices. 3.The Covid19 crisis has caused economic collapse of many tax-paying firms which reduces resources, obliging the UK to be more self-sufficient in food etc. 4.Covid has decimated Gatwick as an employer reducing the need for homes. 5.The fields and woods are precious attributes of the SE Region\'s environment. 6.Rural urbanization threatens long-established residences, environs, privacy, security, and enjoyment, especially from the County Council\'s Worth Way. 7.This counters the Planning Objective of maintaining rural breaks between urban areas of East Grinstead and Crawley/Gatwick. 8.The site is a steep slope which will cause flooding when concreted over. 9.There is no mains drainage below the site. The small stream will be flooded. <p>Heavy rain already overwhelms local sewerage plants in Wallage Lane causing pollution.</p> <p>10.The proposed development straddles a Public Right of Way which is already illegally barred by padlocked gates.</p>

Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

To comply with Government diktats to provide housing in excess of local needs, largely owing to uncontrolled mass immigration, the major change required is to:
Direct urban growth to Regions in need of employment and infrastructure investment where, for example, disused industrial and mining areas can benefit from development.
It is further noted that England is the 7th highest density country in the World (ignoring states with less than 1 million people) and the South East is the densest Region in the UK. Therefore, resistance to development needs to be communicated to Government policy-makers in order to maintain the integrity, self-sufficiency, environment and tranquillity of the realm.

If you wish to provide further documentation to support your response, you can upload it here

If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

The breadth of changes necessary may require cross-examination which may be instructive from my experience as a consultant to the Department of the Environment on the South East Regional Plan, on Scenarios for National Planning Policy and on the costs and effectiveness of New Towns

Please notify me when-The Plan has been submitted for Examination

yes

Please notify me when-The publication of the recommendations from the Examination

yes

Please notify me when-The Site Allocations DPD is adopted

yes

Date

24/09/2020

1025

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA11

ID: 1025

Response Ref: Reg19/1025/6

Respondent: Mrs H Griffiths

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? ✓

Part A – Your Details (You only need to complete this once)

1. Personal Details

Title	<input type="text" value="Dr"/>
First Name	<input type="text" value="Helena"/>
Last Name	<input type="text" value="Griffiths"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>
Line 2	<input type="text" value="REDACTED"/>
Line 3	<input type="text" value="REDACTED"/>
Line 4	<input type="text" value="REDACTED"/>
Post Code	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text" value="REDACTED"/>

Note: Three separate submissions are included under this cover sheet:

- Representation against **St Stephens SA29**
- Representation against **Police House field SA28**
- Representation for sites at **Jeffreys Farm SHELAA 68, 69 and 971**

Part B – Your Comments (St Stephens SA29)

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Helena Griffiths

3a. Does your comment relate to:

Site
Allocations
DPD

Yes

Sustainability
Appraisal

Yes

Habitats Regulations
Assessment

Community
Involvement
Plan

Yes

Equalities
Impact
Assessment

Draft Policies
Maps

3b. To which part does this representation relate?

Paragraph

Policy SA

SA29

Draft Policies Map

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.

Yes

No

X

4b. Sound

Yes

No

X

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected '**No**' to either part of question **4** please also complete question **6b**.

N/A

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

I believe the allocation of site SA29 shows the DPD to not be sound.

Mid Sussex have failed to declare an interest in land adjacent to site SA29 in Horsted Keynes. Inconsistencies exist in how sustainability assessments (SA) have been made, meaning that their land benefits in the longer term, due to the allocation of SA29 being made in this plan. This enables their previously land locked property to be accessed via this site in the future, resulting in over development of the area (in breach of DP13). This clear conflict of interest should require that the SA be able to stand up to local comparisons and public scrutiny. To date, the assessments fall short of any comparison by those who have knowledge of the sites, and the strong positive bias for the allocation of Site SA29 at St Stephens has led to other alternative sites being repeatedly negatively discriminated against.

Positive bias of SA29 includes failure to notify the AONB of the critical risk to the tree belt along the western boundary and access road (with the road being within 2m of the tree trunks with overhanging branches) in breach of DP37 and DP16. Highways have failed to critically assess the parking stress survey, which is in no way a reflection of the reality of the day to day issues on access and parking experienced by the 125 households that are already serviced by the access along the cul-de-sac Hamsland, in breach of DP21 and DP29. The proposed layout in SA29.1 shows the access road bordering the tree belt and boundary to the land owned by MSDC, providing ease of access and spread of development unchallenged in the future. With this representation I submit detailed documentation evidencing the incorrect factual information and inappropriate surveying methods used in the Transport survey submitted by the promoter to incorrectly assess the impact of the development on the residents of Horsted Keynes Attachment A.

Furthermore, I believe the owner of Summerlea (directly affected by the allocation of SA29) applied for TPO's to be put on the trees along his boundary with the proposed access to protect this distinctive tree belt, but this was refused by Mid Sussex Tree Officer after the tree officer consulted with the office – surely a conflict of interests.

Site SA29 is not accessible without destruction of the tree belt, and will have an immense impact on the character of this part of the village as the proposed access runs along a single track road that already serves 125 houses. A petition with over 350 signatures was submitted to MSDC in opposition to the allocation of this site. No attempt has been made to mitigate the impact on the community showing a lack of community involvement.

Discrimination against other sites includes the failure to promptly correct factual information in the SA proformas to sites SHELAA 68, 69 and 971, leading to their omission from allocation. If these factual corrections had been made in a timely manner it would have resulted in the sites being considered as reasonable alternatives. No mitigation of the minor negative impacts of these sites have been considered, even though they have been proposed by the site promoter. With this representation I submit detailed documentation evidencing the incorrect factual information on the site proformas for the omitted sites and also the allocated sites as Attachment B.

I believe the DPD to not be justified. The strategy has failed to take into account suitable and reasonable alternatives, which have been supported by a strong evidence base to be appropriate for allocation. The site SA29 is assessed in the DPD against an 'alternative', SHELAA 216. This site is inappropriate as an alternative, as it is a subset of site SA28 that has been allocated. Other suitable, sustainable, deliverable and developable sites, namely SHELAA 68, 69, and 971 should be used in the reasonable alternatives comparison.

None of my previous concerns outlined in my Reg 18 comments have been addressed in the DPD, now open for Regulation 19 consultation. The plan is thus not being prepared using correct facts or current information, or in a positive manner. The plan is not sound as Mid Sussex have failed to comprehensively assess other sites within the village that are suitable, sustainable, deliverable and developable.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites (SHELAA 68, 69 and 971) and also the allocated sites (SA28 and SA29) as Attachment B. This information should be used to update and amend the SA for the specified sites in Horsted Keynes. The transport and Parking Stress Survey for SA29 should be critically assessed by Highways and a site visit should be made to Hamsland to observe the day to day safety issues experienced down this single-track road leading to 125 homes. The prompter should be asked to resubmit a more realistic, appropriate and accurate assessment. There should be recognition of residents opposition to the allocation of SA29, and the 350 residents who signed a petition against the allocation of this site. Mitigation measures on the effect on the community need to be adequately addressed. The AONB should be asked to reassess the impact level of this development given the detrimental impact on the distinctive tree belt along the access to site SA29, and the restricted access. The policy should enable the defence of the boundary with adjoining fields, not enabling access and the spread of unchecked development in to adjoining fields owned by Mid Sussex. The SA for Horsted Keynes sites should be reconsidered, using factually corrected data, in a clear and transparent manner so that meaningful comparisons can be done between sites, to mitigate any perceived discrimination or positive bias of sites as MSDC have a conflict of interest to allocate site SA29. Following the revised SA, appropriate reasonable alternatives should be considered and all appropriate mitigation measures should be assessed. Had the factual corrections been made to the proformas to HK sites in a timely manner (when first submitted to MSDC in Feb 2019), then this revisiting of the site allocations would not need to be made, but sites should not be discriminated against further by dismissing this as a change 'too late in the day'.

Please note the ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29 given the number of corrections and amount of justifying evidence is vast, as previous representations in Regulation 18 have not been acted upon. Should the inspector require more detail of the evidence I am happy to provide this information.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☐

No, I do not wish to participate at the oral examination

☐

Yes

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29, given the number of factual corrections and amount of justification of evidence is vast, as previous representations in Regulation 18 have not been acted upon.

I would like to participate in the oral part of the examination to be able to address the issues in a timely manner, and to be available for the inspector to ask questions of me.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

☒

(ii) The publication of the recommendations from the Examination

☒

(iii) The Site Allocations DPD is adopted

☒

Signature:



Date:

28/9/20

Thank you for taking time to respond to this consultation

Part B – Your Comments (Police House field SA28)

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Helena Griffiths

3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

3b. To which part does this representation relate?

Paragraph	<input type="checkbox"/>	Policy SA	<input checked="" type="checkbox"/> SA28	Draft Policies Map	<input type="checkbox"/>
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4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4b. Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question **6b.**

N/A

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

I believe the allocation of site SA28 shows the DPD to not be sound.

Inconsistencies exist in how sustainability assessments (SA) have been made for sites in Horsted Keynes, due to the SA being undertaken using incorrect factual information. With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites and also the allocated sites as Attachment B.

The SA need to be able to stand up to local comparisons and public scrutiny. To date, the assessments fall short of any comparison by those who have visited the sites, leading to other alternative sites being repeatedly negatively discriminated against.

The allocation of SA28 was in part due to the failure to notify the AONB of the critical risk to the characterful oak tree which is sites on Birch Grove Road, directly adjacent to the required visibility splays for safe access (with the road being planned to directly abutt the tree trunk, SA28.5, SA28.6, SA28.7) in breach of DP37 and DP16. Thus, Site SA28 is not safely accessible.

The allocation of site SA28 will have an immense impact on the character of this part of the village and does not adequately address the mitigation to the impact on the listed building Lucas Farm, directly opposite the site. No consideration has been given to its location of the former buildings associated with the listed building on the site itself (in SA28.2), and the site promoter is suggesting no vegetation buffer, against AONB advice, so breaching DP34.

I believe the DPD to not be justified. Their strategy has failed to take into account suitable and reasonable alternatives, which have been supported by a strong evidence base to be appropriate for allocation. The site SA28 is assessed in the DPD against an 'alternative', SHELAA 216. This site is inappropriate as an alternative, as it is a subset of site SA28 that has been allocated. Other suitable, sustainable, deliverable and developable sites, namely SHELAA 68, 69, and 971 should be used in the reasonable alternatives comparison.

None of my previous concerns outlined in my Reg 18 comments have been addressed in the DPD, now open for Regulation 19 consultation. The plan is thus not being prepared using correct or current factual information, or in a positive manner. The plan is not sound as Mid Sussex have failed to comprehensively assess other sites within the village that are suitable, sustainable, deliverable and developable.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

With this representation I submit detailed documentation evidencing the incorrect factual information on the site proformas for the omitted sites (SHELAA 68, 69 and 971) and also the allocated sites (SA28 and SA29) as Attachment B. This information should be used to update and amend the SA for the specified sites in Horsted Keynes.

The AONB should be asked to reassess the impact level of this development given the detrimental impact on the distinctive tree that will be critically affected by the visibility spays needed to give safe access to site SA28.

The SA for Horsted Keynes sites should be reconsidered, using corrected factual data, in a clear and transparent manner so that meaningful comparisons can be done between sites. Following the revised SA, appropriate reasonable alternatives should be considered and all appropriate mitigation measures should be assessed.

Had the factual corrections been made to the proformas to HK sites in a timely manner (when first submitted to MSDC in Feb 2019), then this revisiting of the site allocations would not need to be made, but sites should not be discriminated against by dismissing this as a change 'too late in the day'.

Please note the ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29 given the number of corrections and amount of justifying evidence is vast, as previous representations in Regulation 18 have not been acted upon. Should the inspector require more detail of the evidence I am happy to provide this information.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☐

No, I do not wish to participate at the oral examination

☐

Yes

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA28 given the number of corrections and amount of justification of evidence is vast, as previous representations in Regulation 18 have not been acted upon.

I would like to participate in the oral part of the examination to be able to address the issues in a timely manner, and to be available for the inspector to ask questions of me.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

☒

(ii) The publication of the recommendations from the Examination

☒

(iii) The Site Allocations DPD is adopted

☒

Signature



Date:

28/9/20

Part B – Your Comments (Omission of Jeffreys Farm sites 68, 69 and 971)

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Helena Griffiths

3a. Does your comment relate to:

Site Allocations DPD	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input type="checkbox"/>
Community Involvement Plan	<input type="checkbox"/>	Equalities Impact Assessment	<input type="checkbox"/>	Draft Policies Maps	<input type="checkbox"/>

3b. To which part does this representation relate?

Paragraph	<input type="text"/>	Policy SA	SA11	Draft Policies Map	<input type="text"/>
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4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4b. Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'No' to either part of question 4 please also complete question **6b.**

N/A

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

I believe the failure of consistency and use of factually incorrect information within the Sustainability Assessment (SA) of sites in Horsted Keynes shows the DPD to not be sound, and is in breach of Policy SA11.

Why, in Horsted Keynes, is a green field site on a medieval field system which would severely impact a large number of residents (125 households) living down a cul-de-sac, with no existing access, being allocated, over a brown field site with existing tarmacked access? This is a question many residents of Horsted Keynes are asking.

Inconsistencies exist in how the SA have been made, resulting in the inappropriate allocation of sites SA28 and SA29 over other sites that are equally appropriate for allocation (notably SHELAA 68, 69 and 971).

The SA should be able to stand up to local comparisons and public scrutiny. To date, the assessments fall short of any comparison by those who have visited the sites, and the strong positive bias for the allocation of Site SA29 at St Stephens (where Mid Sussex has a conflict of interest) has led to other alternative sites being repeatedly negatively discriminated against, especially SHELAA 68, 69 and 971.

In regard to SHELAA 971, the Built-Up Area Boundary does not reflect the current built development adjacent to the site, the boundary needs revision to reflect the true built form of Horsted Keynes.

The failure to promptly correct factually incorrect information in the SA proformas to sites SHELAA 68, 69 and 971, has led to their omission from allocation. If these corrections had been made in a timely manner it would have resulted in the sites being considered as reasonable alternatives. No mitigation of the minor negative impacts of these sites have been considered, even though they have been proposed by the site promoter. The SA have not used current information available, including information referred to by the promoter in association with recent planning applications to assess the SHELAA 68, 69 and 971 sites.

With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites and also the allocated sites as Attachment B.

AONB assessment of all sites was a desk top exercise and does not adequately address information that has been omitted in the site SA proformas.

I believe the DPD to not be justified. Their strategy has failed to take into account suitable and reasonable alternatives, which have been supported by a strong evidence base to be appropriate for allocation. The allocated sites SA28 and SA29 are assessed in the DPD against an 'alternative', SHELAA 216. This site is inappropriate as an alternative, as it is a subset of site SA28 that has been allocated. Other suitable, sustainable, deliverable and developable sites, namely SHELAA 68, 69, and 971 should be used in the reasonable alternatives comparison.

The allocation of SHELAA 68, 69, and 971 would go a long way to positively impact the communities' health, social and cultural well-being, as a large purposeful recreation space was part of a previous planning application, in stark comparison to the allocated sites who have token green space planned.

None of my previous concerns outlined in my Reg 18 comments have been acknowledged in the summary document, or addressed in the DPD, now open for Regulation 19 consultation. The plan is thus not being prepared using correct or current information, and in a positive manner. An unwillingness to add or remove sites, or to correct basic factual errors shows the plan to have been prepared with no concern for a duty to cooperate. The plan is not sound as Mid Sussex have failed to comprehensively assess other sites within the village that are suitable, sustainable, deliverable and developable.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites (SHELAA 68, 69 and 971) and also the allocated sites (SA28 and SA29) as Attachment B. This information should be used to update and amend the SA for the specified sites in Horsted Keynes. The AONB should be asked to reassess the impact level of development on all sites in Horsted Keynes and especially SHELAA 68, 69 and 971 using the corrected factual information as above, and also the full information on the impact of development on the trees at sites SA28 and SA29.

Built-Up Area Boundary should be revised to reflect the current built development to reflect the true built form of Horsted Keynes.

The SA for Horsted Keynes sites should be reconsidered, using factual corrected data, in a clear and transparent manner so that meaningful comparisons can be done between sites. Following the revised SA, appropriate reasonable alternatives should be considered and all appropriate mitigation measures should be assessed.

Suitable, sustainable, deliverable and developable options are available in Horsted Keynes to achieve the OAN of 70 houses, and additional sites (SHELAA 68, 69 and 971) should be allocated to take the deficit burden away from other settlements.

Had the corrections been made to the proformas to HK sites in a timely manner (when first submitted to MSDC in Feb 2019), then this revisiting of the site allocations would not need to be made, but sites should not be discriminated against by dismissing this as a change 'too late in the day'.

Please note the ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for the SA, notably SHELAA 68, 69 and 971, given the number of corrections and amount of justifying evidence is vast, as previous representations in Regulation 18 have not been acted upon. Should the inspector require more detail of the evidence I am happy to provide this information.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☐

No, I do not wish to participate at the oral examination

☐ Yes

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for the SHELAA sites 68, 69, and 971 given the number of corrections and amount of justification of evidence is vast, as previous representations in Regulation 18 have not been acted upon.

I would like to participate in the oral part of the examination to be able to address the issues in a timely manner, and to be available for the inspector to ask questions of me.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

☒ X

(ii) The publication of the recommendations from the Examination

☒ X

(iii) The Site Allocations DPD is adopted

☒ X

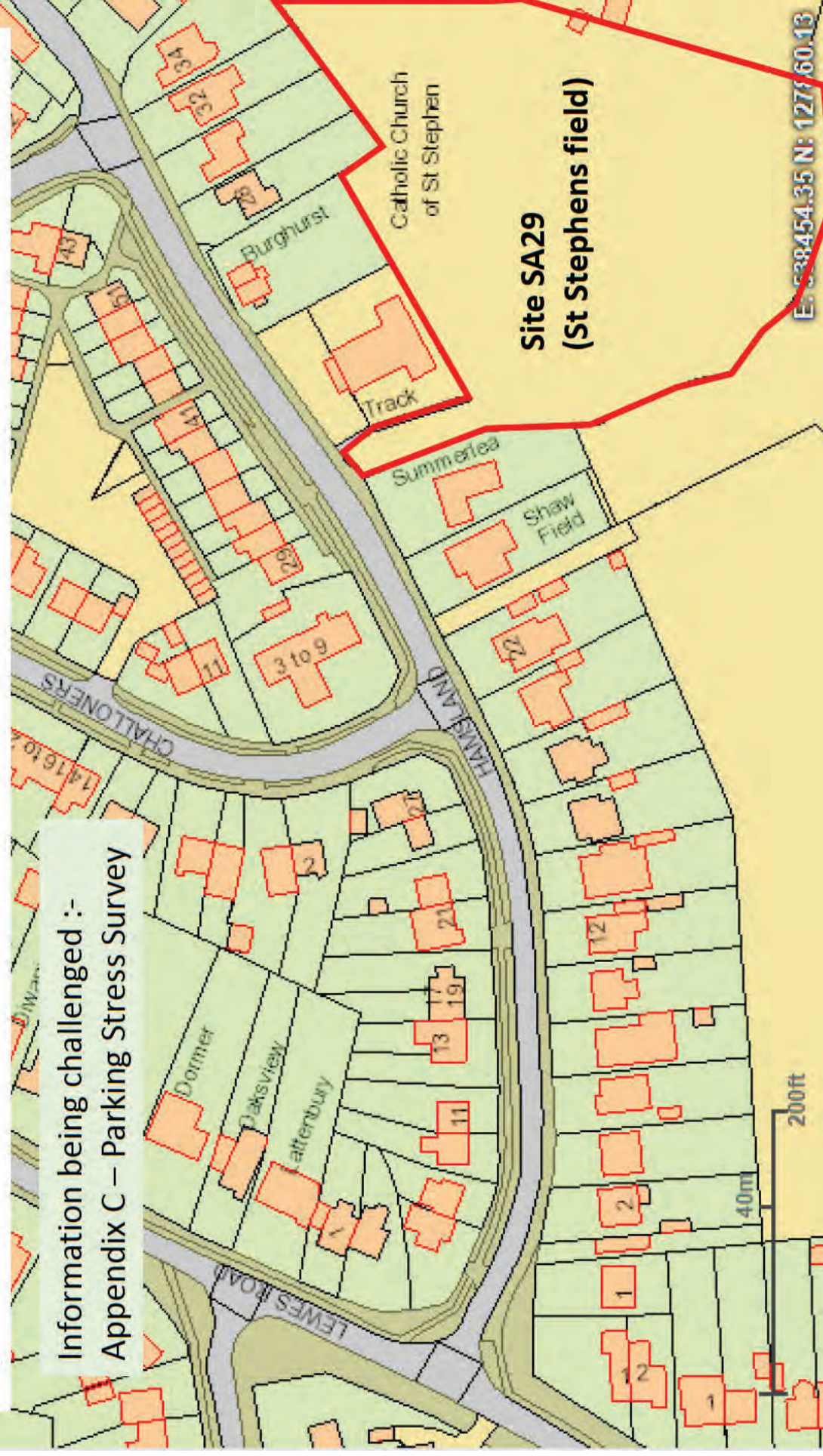
Signature:

Date:

28/9/20

**Critical assessment of transport survey SA29.4 submitted in regard
of site SA29 (St Stephens field) at Hamsland, Horsted Keynes
by Dr. H M Griffiths**

Information being challenged :-
Appendix C – Parking Stress Survey



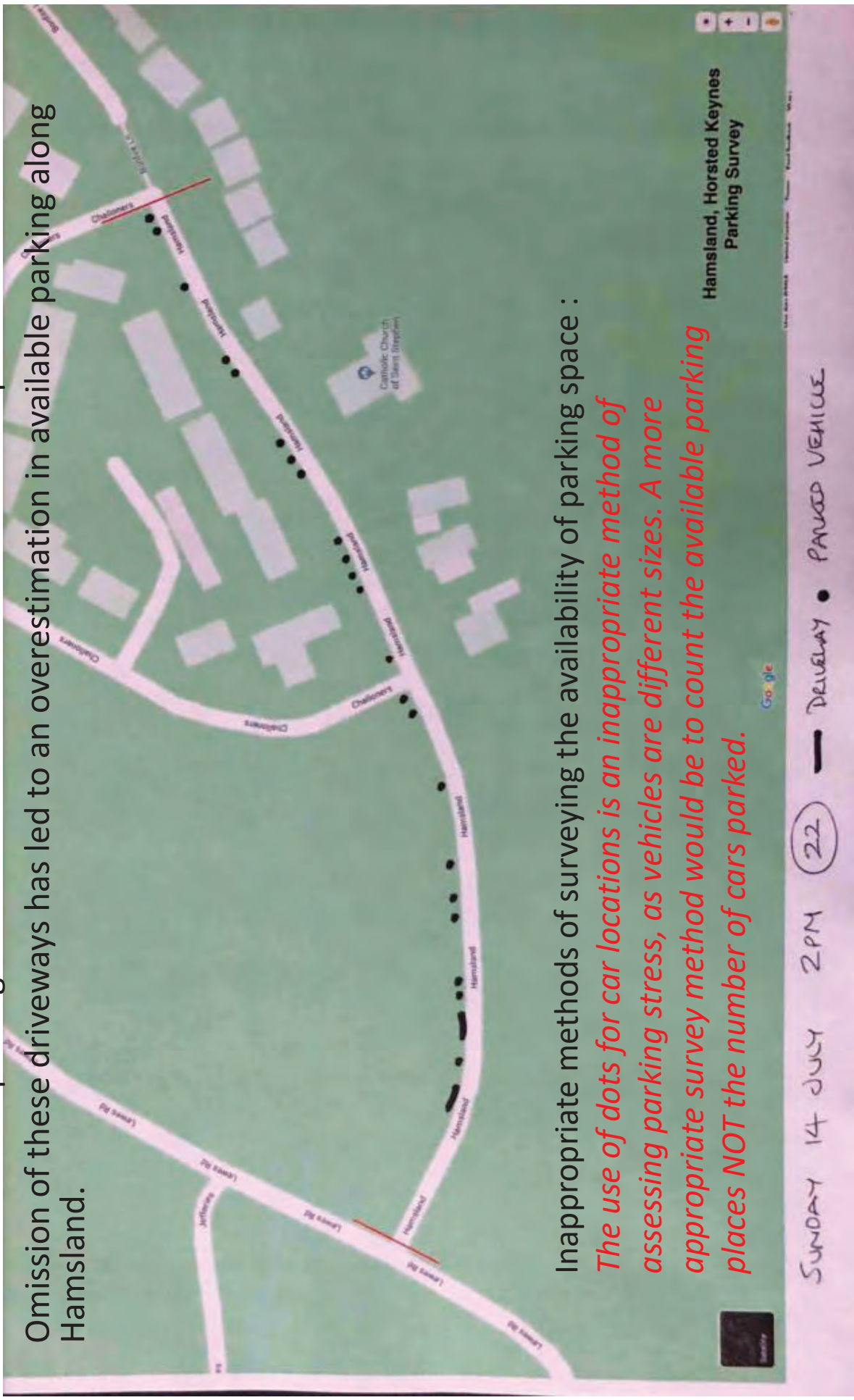
Introduction

- The parking stress survey SA29.4 is not representative in any way of the lack of parking along Hamsland on a daily basis. Hamsland is a cul-de-sac servicing 129 houses, with access being the single car width road in and out.
- Mitigation measures on parking stress need to be addressed for the development of site SA29, before the site is allocated, to address the long term safety and wellbeing of residents
- The survey SA29.4 clearly uses 'standard' minimal car lengths and measurement methods that are not appropriate for a rural village.
- The reliability of the measurements and vehicle counts made is brought in to question due to critical omissions in the survey SA29.4.
- Evidence is shown in the following slides.
 - Inaccurate survey sheets
 - Inappropriate methods of surveying the availability of parking spaces
 - Inaccurate measuring methods
- A photographic survey is presented by Dr H M Griffiths as evidence to this critical misrepresentation of parking stress on Hamsland
- This photographic survey shows that it is impossible to park 42 cars along Hamsland, and that the existing 'available' parking spaces are actually needed as passing places along Hamsland to enable the flow of traffic. This is even before the added stress of a development of 30 houses on site SA29.

Inaccurate survey sheets:

The Parking survey sheets (example below) show the driveways used in the analysis (two on the west end of Hamsland). There are **additional driveways** that need to be addressed in the parking stress calculations. See next slides and photos for locations.

Omission of these driveways has led to an overestimation in available parking along Hamsland.



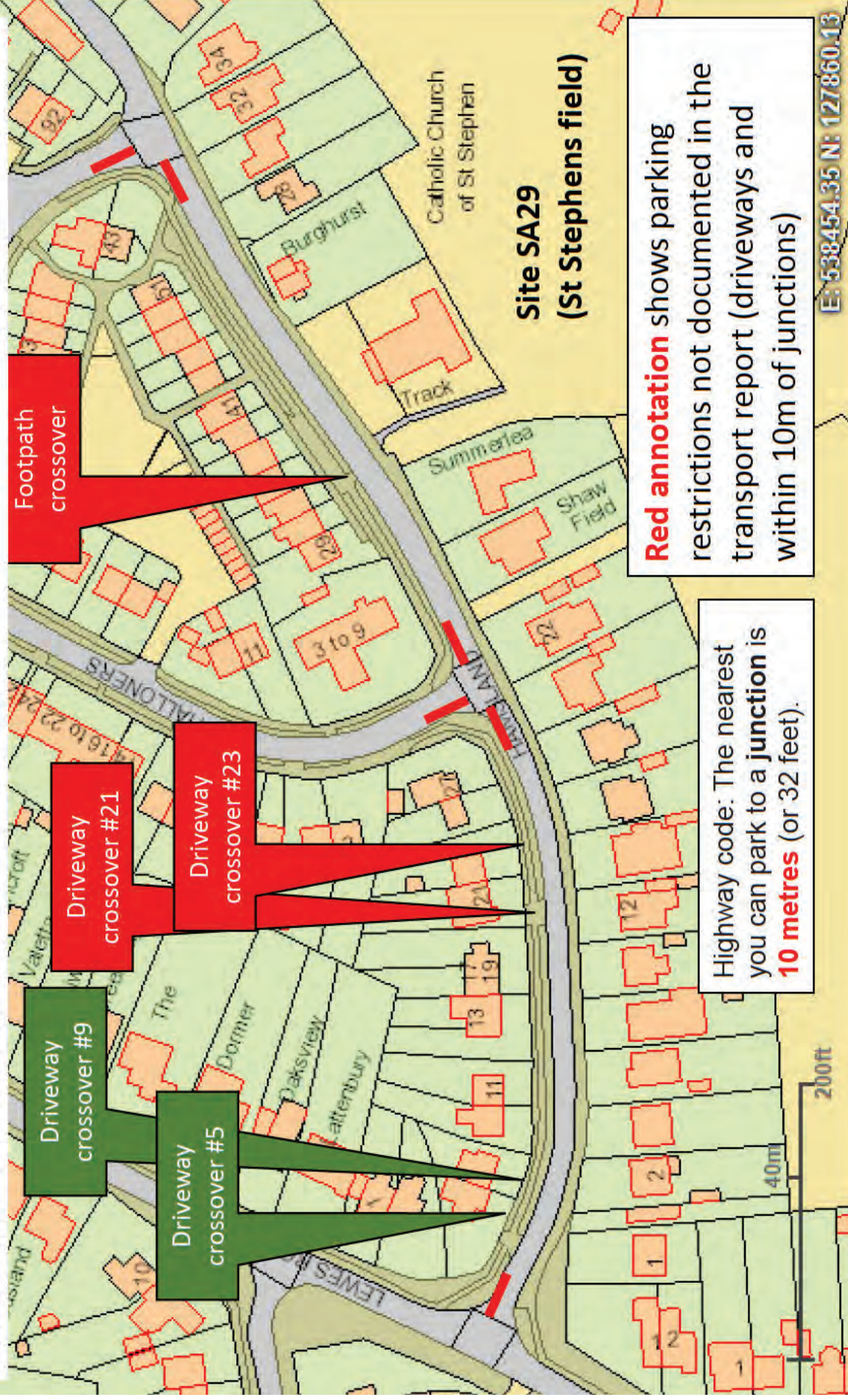
Inappropriate methods of surveying the availability of parking space :

The use of dots for car locations is an inappropriate method of assessing parking stress, as vehicles are different sizes. A more appropriate survey method would be to count the available parking places NOT the number of cars parked.

Inaccurate survey sheets:

Information omitted from Appendix C of SA29.4 – Parking Stress Survey

The omission of driveways and also a 10m no parking zone at junctions has led to an underestimate of parking stress

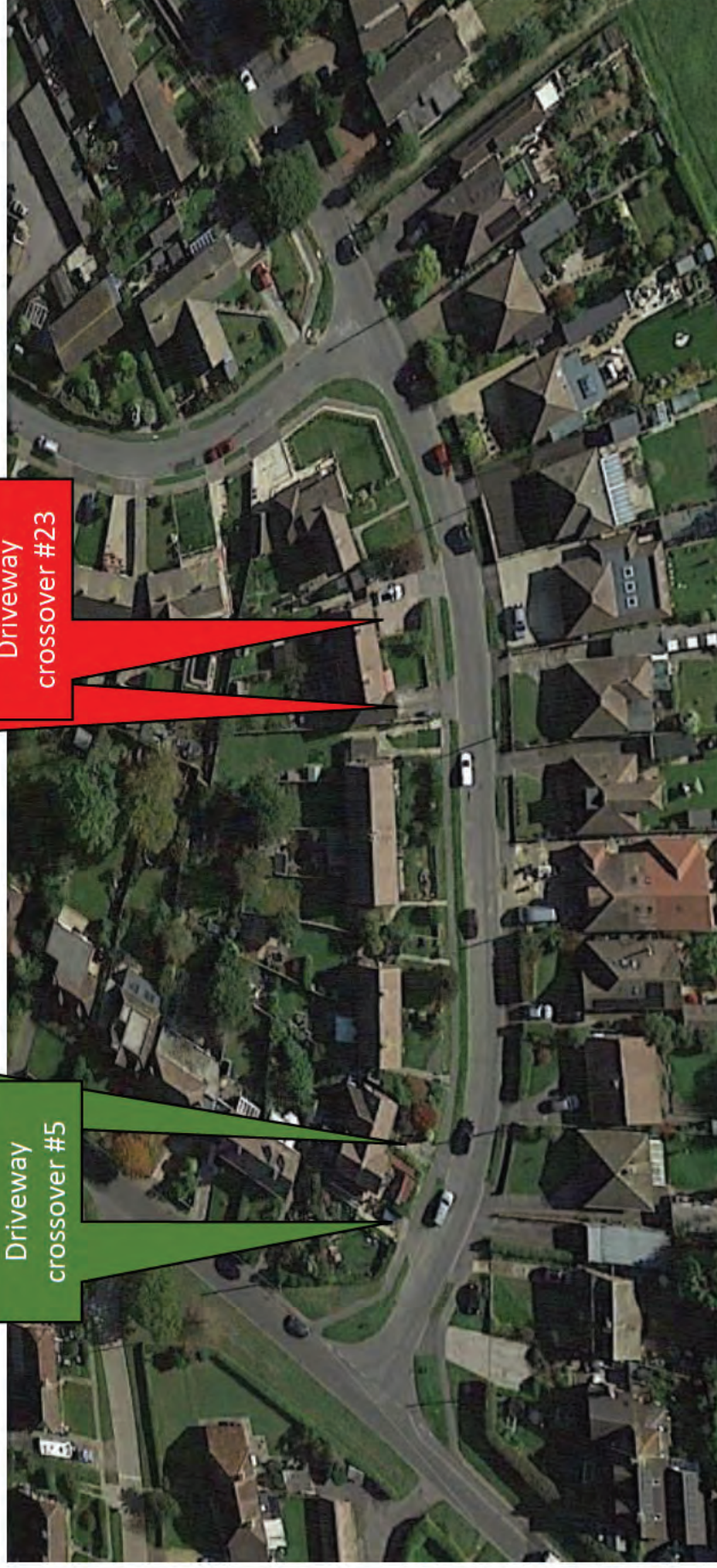


Driveway
crossover #9

Driveway
crossover #5

Driveway
crossover #21

Driveway
crossover #23



Inaccurate survey sheets:
Google Earth image showing the driveways that have been
omitted (in red) leading to an underestimate of parking stress

Google

Note: image from 2001 so does not show representative traffic issues in 2020

2001

Imagery Date: 10/10/2018

51°01'58.86" N

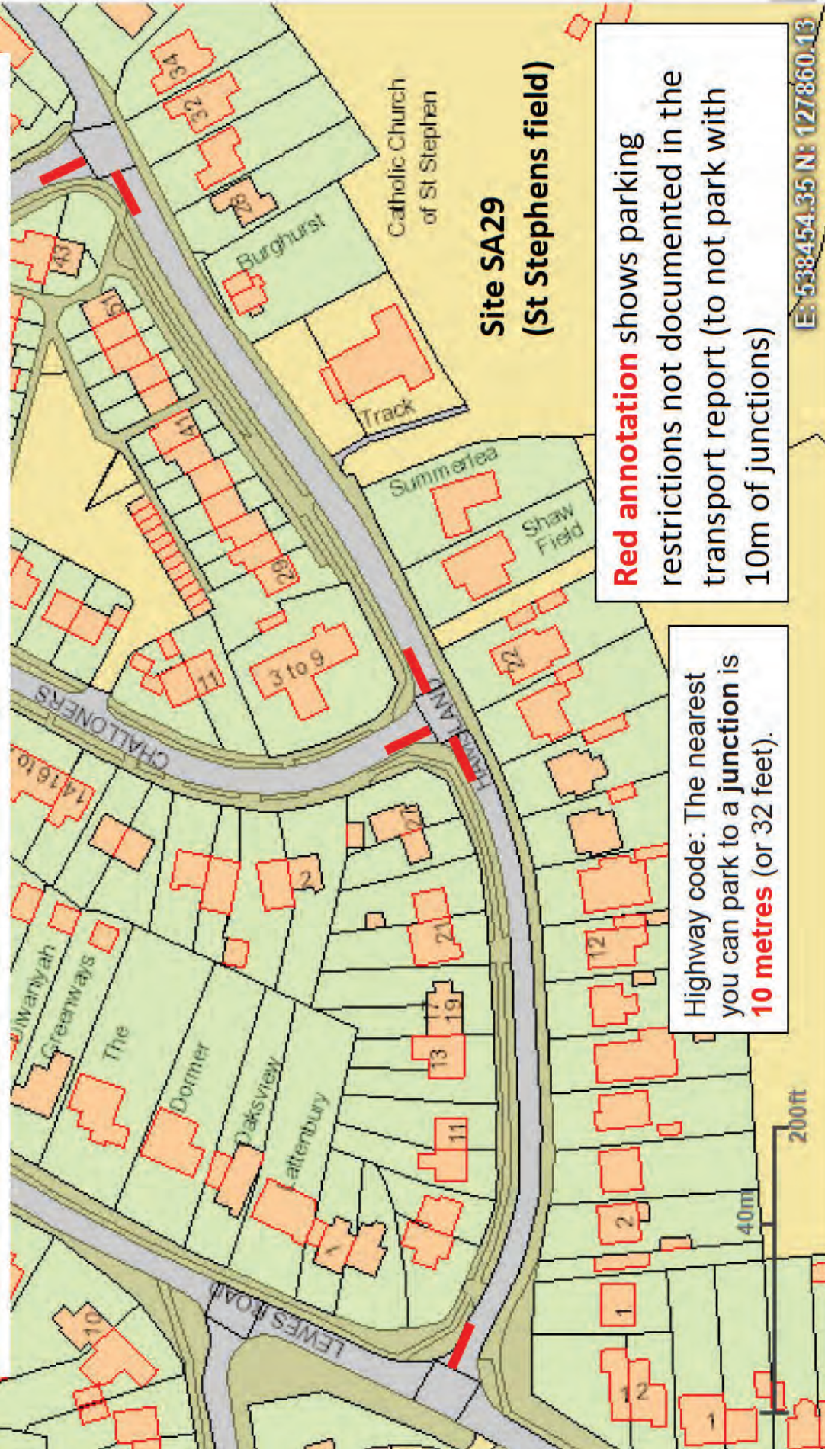
0°01'43.63" W

elev. 0 m

ave. a

Inaccurate measuring methods:

Following undertaking my own photographic survey it is clear that the survey on parking stress did not take in to account that you should not park within 10m of a junction to aid in the visibility for cars entering and exiting the junction. The omission to do this has led to an underestimate of the parking stress.



Inappropriate information used to calculate parking stress:

- Car length used to calculate parking (measured off Appendix G - Proposed Access Arrangement) = 4m (6m including space to manoeuvre)
- 'urban' or 'small size' cars are those under 4m
- Horsted Keynes **is not an urban area** so more appropriate size cars should be used – a higher proportion of residents are trades people, tree surgeons, builders, all with large vehicles for their trade.
- Existing usage of vehicles is not solely cars, but includes:
 - Vans
 - Landrovers
 - 4x4 / pickup
- Section 2.19 states that Hamsland can accommodate 42 vehicles. This would be a useable length of 252m (6m x 42 cars) including allowance for driveways and 10m at junctions. The total measured distance of Hamsland NOT taking in to account driveways and 10m at junctions is 231m. The photographic survey shows that legal parking of 42 vehicle is impossible.
- Section 2.19 states that driveways have been taken in to account, however I have noted that 50% of the driveways have been missed, thus underestimating the level of parking stress.
- Section 2.21 states that a max number of parked vehicles was 24. This data is not disputed, but following my own survey the number of possible 'available' spaces left from 27 parked vehicles does not align with a 57% parking capacity suggested in the promoters parking survey. All available spaces are used as passing places by the residents, as Hamsland is essentially a single lane road.
- The parking stress information has been directly used by WSCC in their response to pre-application advice of the site in Appendix A – WSCC Pre-app Scoping response. This data is an underestimate and further representative data should be requested by WSCC to come to their conclusions.

Photo survey Sunday 27/9/20 Part 1



Photo survey Sunday 27/9/20 Part 2



Summary of photographic parking survey of Hamsland 27/9/20

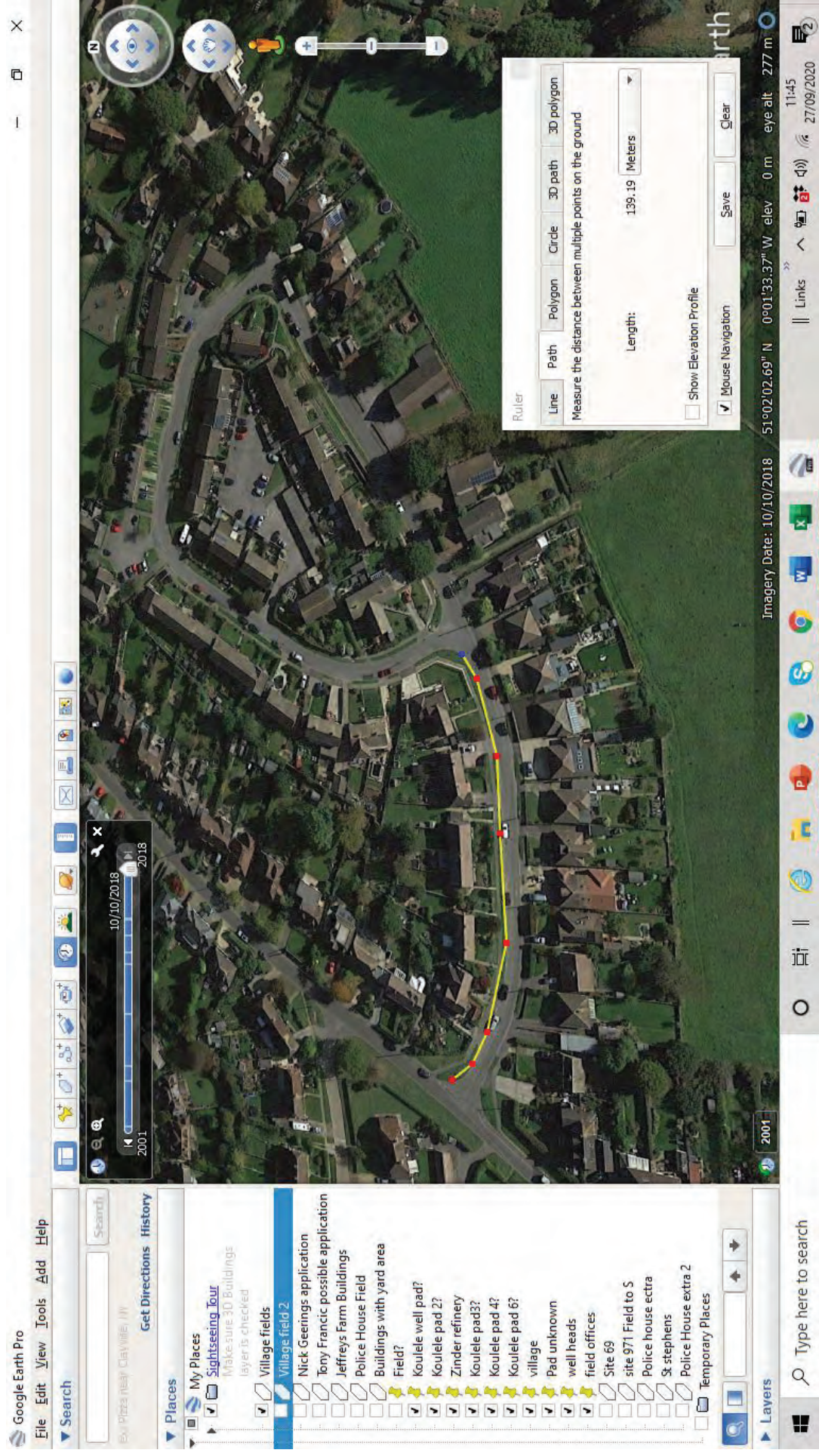
- 27 vehicles parked legally (labelled 1 to 27)
- Not taken in to account cars parked illegally (within 10m of a junction box or over pedestrian crossings or driveways – 5 documented on Hamsland)
- Parking spaces available 7 (labelled A to G), but 3 of these are also needed as informal **passing places** as there is not the width for 2 cars to pass along the entirety of Hamsland due to the number of cars parked.
- Total capacity legally = $27 + (7-3) = 31$
- Capacity according to SA29.4 traffic survey = 42 (unrealistic)
- Traffic survey under measures the number of driveways by 50%
- Traffic survey makes no allowance for passing places to enable the flow of traffic
- Traffic survey assumes car length of 4m (+2m for turning) – 4m is a Small car – not representative of the size of vehicles currently parking on Hamsland (this is a village with tree surgeons, builders, trades people all with larger vehicles of trucks/vans).
- Traffic survey appears to not take in to account the illegal parking of vehicles within 10m of a junction
- This information is supported a second photographic survey undertaken at 7:30am on Tuesday 15/9/20. 27 vehicles were parked on Hamsland. These additional supporting evidence photos can be made available should the inspector want to view them.

Conclusions

- The parking stress survey SA29.4 is **not representative** in any way of the lack of parking along Hamsland on a daily basis.
- Mitigation measures on parking stress need to be addressed for the development of site SA29, before the site is allocated
- The survey SA29.4 clearly uses ‘standard’ car lengths and **measurement methods that are not appropriate for a rural village**.
- The **reliability of the measurements** and vehicle counts made is brought in to question due to critical omissions in the survey SA29.4.
- Evidence is shown in the following slides.
 - Inaccurate survey sheets
 - Inappropriate methods of surveying the availability of parking space
 - Inaccurate measuring methods
- A photographic survey is presented by Dr H M Griffiths as evidence to this **critical misrepresentation** of parking stress on Hamsland
- This photographic survey shows that it is **impossible** to park 42 cars along Hamsland, and that the existing ‘available’ parking spaces are actually needed **as passing places** along Hamsland to enable the flow of traffic. This is even before the added stress of a development of 30 houses on site SA29

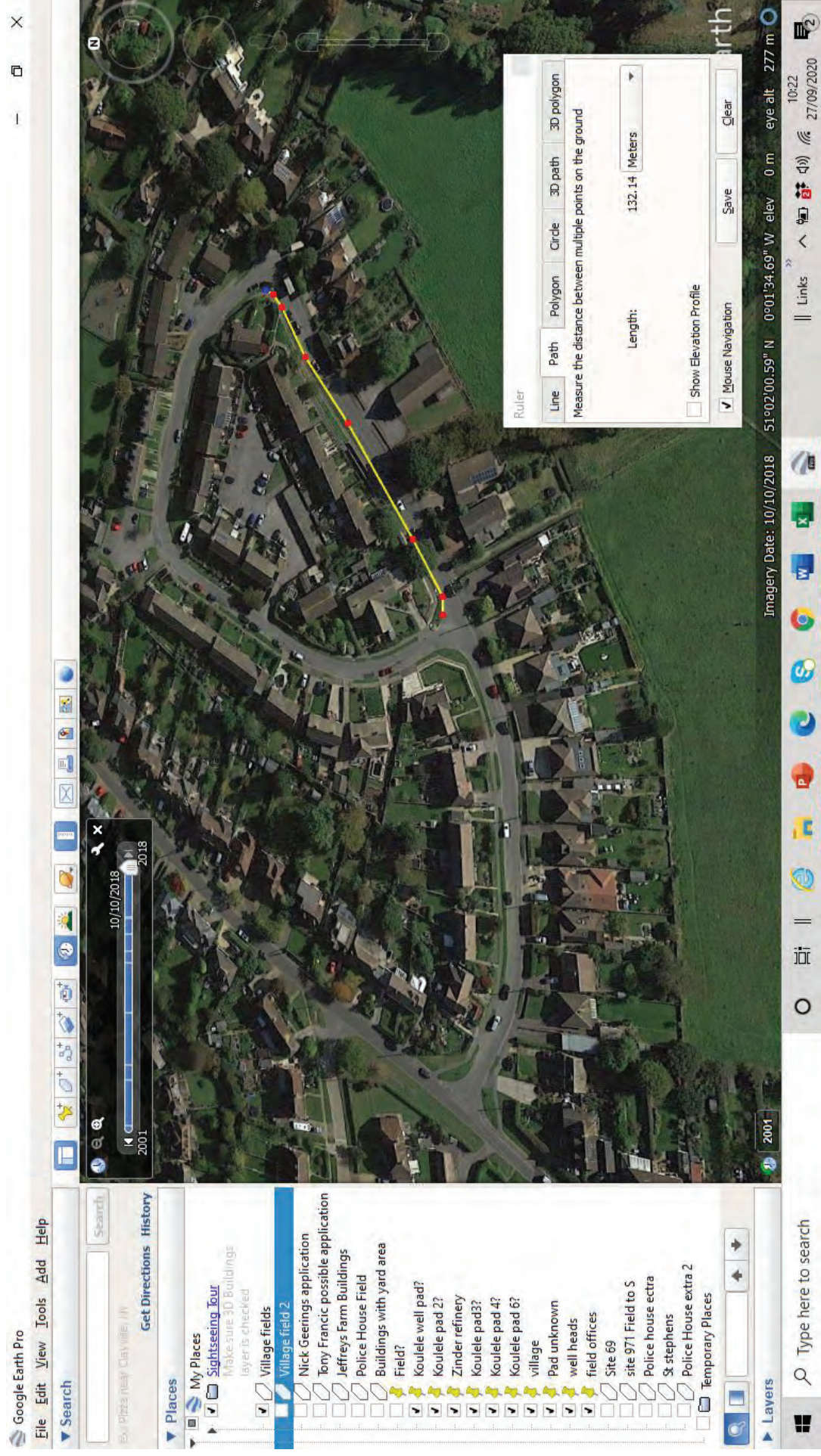
Distance measured along the western section of Hamsland from Junction box to Junction box = 139m

This does not take in to account the 10m distance from the junction, nor driveways or footpath crossings.



Distance measured along the eastern section of Hamsland from Junction box to Junction box = 132m

This does not take in to account the 10m distance from the junction, nor driveways or footpath crossings.



Regulation 19 comments to MSDC DPD

ATTACHMENT B – corrections to incorrect data in the Sustainability Appraisal concerning sites at Jeffreys Farm (Farm buildings #68, Fields to North of Farm Buildings #69, and Fields to South of Farm Buildings #971), and other sites in Horsted Keynes (SA28 and SA29).

September 2020

Prepared by Dr. H. Griffiths

A detailed submission, documenting corrections to the information provided in the Regulation 18 consultation Sustainability Appraisal, was submitted in November 2019. Many of these corrections have not been made to the Regulation 19 Sustainability Appraisal. This document again evidences the corrections to data that should be completed to enable the assessment and comparison of sites in Horsted Keynes for realistically reasonable alternatives.

The failure to correct this information will lead to the analysis of sites in Horsted Keynes being flawed. All sites in Horsted Keynes should be re-appraised on a level playing field using correct and unflawed advice, to allow for ‘the most suitable sites at each settlement to be chosen to meet the residual needs of that settlement’.

Please note, supporting documentation to this evidence is also being included as Appendices to this document (8 in number).

For ease I have divided the corrections in to site specific issues, the different sites being listed below:

- Site SHELAA 68 - Farm buildings, Jeffreys Farm, Horsted Keynes
- Site SHELAA 69 - Land at Jeffreys Farm (Fields to North of farm buildings)
- Site SHELAA 971 - Land at Jeffreys Farm (Fields to South of farm buildings)
- Site SHELAA 184 (SA29)- Land South of St Stephens Church
- Sites SHELAA 216/807 (SA28) - Land at Police House Field

Site SHELAA 68 - Farm buildings, Jeffreys Farm, Horsted Keynes

Information in the Site 68 proforma (SSP3 Appendix 3 Proformas page 230-231) of Site selection paper 3 Appendix B Housing site proformas, is incorrect, and has been mistakenly used to dismiss the site from allocation.

- **Part 2, point 11, Local Road Access:** Denoted as ‘Significant Improve’, citing ‘*In this location, there could be significant conflict with the existing junction (creating a crossroads). It has not been demonstrated that a satisfactory access can be achieved to the site. Insufficient provisions in the locality suggest that the site is likely to be over reliant on private car use.*’
 - Mitigation to provide a safe access is possible as land either side of the access track (including the field to the north of the track often referred to as the ‘Front Field’) is

in the same ownership as the site. Refer to registry documents as attached to this submission as Appendix 1). A plan showing access and visibility splays close to the existing access is attached to this submission as Appendix 6. As the landowners own a substantial section of road frontage including that shown in the attached plans, there are subsequently no access issues for site 68.

- Recent planning applications on the farm sites (refer to DM/16/3974 and DM/19/0957) also proposed an additional potential access to the site to the north of the existing access, further north along Sugar Lane. Visibility splays here are possible without the loss of mature trees, and the access does not conflict with the existing junction at Jefferies. A plan showing this access and associated visibility splays is attached to this submission as Appendix 7. These planning applications and associated access plans saw **no objection raised by WSCC Highways**, showing there are no access issues for site 68.
 - Some of the land proposed for a safe access (the 'Front Field') is subject to a covenant, of which the owner of the Farmhouse is solely the beneficiary (not the owner). The covenant states that the owners of the land should '*not erect a building of any type.... with the exception of a sports pavilion.*'. This prevents the building of houses on the land, but this does not restrict access across the land. A copy of the covenant is attached to this submission as Appendix 2, showing there are no access issues for site 68.
 - For legal clarity, the landowners have had the details of the covenant verified legally by a barrister on the Attorney General's Panel of Counsel in the Radcliff Chambers in London. The conclusion of the barrister is that '*the construction of an access road across (the land)... would not constitute the erection of a building within the meaning of the covenant*'. A copy of the barristers comments is attached to this submission as Appendix 3, showing there are no access issues for site 68.
 - All of the above shows evidence that access is possible and should be taken in to account when assessing the access to the site , and we believe a reassessment using the MSDC guidelines for Access in the Site Selection Paper 2 - Methodology for Site Selection, would result in an assessment of '**Minor**' to '**Moderate**' for site access.
- **Part 3, point 14, Education:** The distance from the site to the school has been incorrectly allocated to be a 15 to 20 minute walk. The distance is 1.124km (as measured on Promap), so should be classed as a **10 – 15 min walk** if following the MSDC guidelines for Education in the Site Selection Paper 2 - Methodology for Site Selection.
 - **Part 3, point 16, Services:** The distance from the site to the village centre has been incorrectly allocated to a 10 to 15 minute walk. The distance is 691m (as measured on Promap), so should be classed as a **10 min walk** if following the MSDC guidelines for Services from MSDC Site Selection Paper 2 - Methodology for Site Selection.
 - These corrections have been raised previously with Mid Sussex planning, both in April 2019 when the proformas were sent out to landowners to 'fact check', and also when the documents were released in September 2019 for Regulation 18, prior to the scrutiny committee reviewing them. They have not been amended in the current form of the Sustainability appraisal for Regulation 19 consultation.

Site 68 conclusions:

The sustainability assessment for site 68 Farm buildings, Jeffreys Farm is fundamentally flawed due to the **incorrect information** being used to assess the site. The issues around access are unfounded, and the site should be deemed **accessible**, and hence **sustainable**, and **included in the allocated sites as a realistic reasonable alternative to other sites in the village.**

Site SHELAA 69 - Jeffrey's Farm Northern Fields (Ludwell Field adjacent Keysford and Sugar Lane)

Information in the Site SHELAA 69 proforma (page 232-233 of Site selection paper 3 Appendix B Housing site proformas), is disputable, and has been mistakenly used to dismiss the site from allocation.

- **Part 1, point 1, AONB:** The AONB had advised that they consider a development of this site would be 'High impact', citing *'High impact on AONB as development would be out of character with the settlement pattern of Horsted Keynes. Undulating field to the north of the farmyard site. No watercourses mapped. Jeffrey's Farm is a historic farmstead separated from the village by Sugar Lane. The western side of the lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area. Sugar Lane and Keysford Lane are historic routeways. Mature trees on field boundaries and a dense screen of trees along Sugar Lane and at the junction with Keysford Lane which probably marks the original wider junction for driving stock. Post medieval field system due to more recent field amalgamations. Given the probable age of Jeffrey's Farmhouse it is likely that the whole farmstead is medieval in origin. Very limited views into the site from routeways due to mature hedgerows and trees.'*
 - There seems to be an inconsistency of the AONB assessment of this site when compared to other sites in the village, as the advice is not a measurable indicator, and purely qualitative. This inconsistency has been highlighted to the AONB unit in September 2019 by form of a challenge document sent to the AONB. This challenge document is attached to this email as Appendix 4. The main points of the challenge are summarised below, but I would ask you to consider Appendix 4 in its entirety.
 - The May 2019 'high impact' assessment of site #69 does not reflect that site 69 is proposed in a field that is classed as a **modern field system**, in stark contrast to the medieval field systems that the currently allocated sites are in.
 - The May 2019 'high impact' assessment of site #69 does not reflect the reduction in area being promoted (from site 780 withdrawn from consideration), the reduced number of housing units being proposed, nor the fact that this site is now only occupying a modern field system.
 - The description of site #69, specifically under the AONB characterisation category of 'Settlement' is incorrect and misleading. Terminology used forms a negative image of the site, and is not objective.

- When comparing the high impact conclusion reached in relation to site #69 with other sites in Horsted Keynes that have a high impact rating, there are dramatic discrepancies in the characteristics which suggest that site #69 is not being assessed consistently.
 - The AONB assessment of sites is a simple and basic qualitative process, rather than a quantitative process and as a result is open to wildly different interpretation by different assessors.
- The AONB have kindly responded to the challenge made, and their comments are attached to this email as Appendix 5.
- Comments of note in the response from the AONB include:
 - The AONB state that *'This was a desktop assessment based on the AONB Unit's datasets (metadata included within the reports) and it was clearly stated that they [the assessments] would need to be supplemented by evidence on visual impact.'*
 - Site 69 *'development would be out of character with the settlement pattern of Horsted Keynes', yet 'The AONB assessment relates to historic settlement pattern [and] Twentieth century additions to the village are not relevant to this assessment.'*
 - Site assessment *'did not take into account any further information provided by developers for the SHELAA or to support planning applications',*
 - *'Potential mitigation is a matter for consideration by the District Council and the Parish Council'*
- Given the AONB assessment of sites in Horsted Keynes was a desk top assessment , and that their input is described as *'advice on how to conserve and enhance the AONB'*, and that *'the effect on views in and out of a site can really only be assessed on site'*, I feel the 'high impact' assessment should not be used to dismiss this site as being a sustainable option for development in Horsted Keynes. The challenge document sent to the AONB (Appendix 4) describes in detail the evidence that site 69 has little visual impact on the AONB, and this should be fed in to the DPS sustainability assessment of site 69. This visual impact is given weight by a Visual Impact Assessment that was part of the planning application DM/16/3974, and is attached to this submission as Appendix 8.
- The AONB assess sites on their relation to *'historic settlement pattern'*, thus to include comment on how any sites in Horsted Keynes relate to modern development should not be considered relevant. Historic development was in the form of single houses and farmsteads, but these farmsteads are now being over-run on all parts of the village. All sites being promoted in the village, including those that have been allocated in the draft plan, could thus be described as being *'out of character with the settlement pattern'*.
- Precedent has been set through the development to the west of the road system bounding the western fringes of the village (along Treemans Road), where development is along both sides of the road. Treemans Road is called Sugar Lane at its northern extent, so development to the west of Sugar lane is not out of character.

- Assessments for the development plan should include information from developers regarding site specific plans, and these should be fed in to the AONB assessments, especially if it involves the removal of mature trees and hedgeline. For site 69 the landowner will not be removing any mature trees for access, and this has been demonstrated in recent planning applications (refer to tree surveys and LVIA for applications DM/16/3974 and DM/19/0957).
- The 'high impact' assessment from advice from the AONB does not mean that development on site 69 cannot be successfully mitigated, and this is '*a matter for consideration by the District Council and the Parish Council*'. Proposed mitigation has been shown in detail in previous planning applications on the Jeffreys Farm sites (see DM/16/3974 and DM/19/0957). The preservation and improvement of existing mature hedgelines which already give '*Very limited views into the site from routeways*' should be considered as mitigation. The landowners plan of enhancing the AONB by provision of on-site green space and wildflower meadows, in addition to extra planting to screen the visibility of the site should also be considered. This has not been adequately addressed by the DPD sustainability assessment, and I propose this would successfully mitigate the 'high impact' AONB assessment, and the impact could be deemed to be 'low to moderate' with mitigation.
- **Part 1, point 5, Listed buildings:** The DPD sustainability assessment states that Ludwell Grange has '*some views of the site from the upstairs rear windows of the farmhouse can be afforded through gaps in the hedgeline, particularly in winter months*', and that '*There would be a higher level of harm if a new access was needed to be created from Keysford Lane or through the tree belt on Sugar Lane which would open up the site to wider view.*' For Boxes Farmhouse the site visibility is described as being '*the tree belt is well established, there are some views through the gaps to the site behind, particularly in winter months. If access to this site was provided along this lane, then the site would be even more open to view*'.
 - The proposed access to site 69 is NOT along Keysford Lane or through the tree belt on Sugar Lane, as these afford good visibility buffers to the routeways and also the listed buildings. The access proposed is further south along Sugar Lane (see Appendix 6 and 7). The proposed access is through the open field to the south known as the 'Front Field'. This access has been discussed in detail in the previous section on site 68, and all points made should also be considered for site 69 in this regard. Thus the impact on the listed buildings will be minimal, and can be successfully mitigated.
 - There are many means of mitigating the views '*through gaps in the hedgeline*', and as discussed above in the AONB impact section, we plan to plant native vegetation to enhance the existing mature vegetation buffer of the site and enhance the hedgerows further.
 - I think it should be noted that Boxes Farm is surrounded by 15 ft mature evergreen laurel hedges so I am surprised at the visibility description.
 - The description of impact on both of these listed buildings seems to be highlighted in a great deal of detail in comparison to other sites assessed in Horsted Keynes. I will discuss this further when I discuss site SHELAA 807 (SA28) Police House Field, and the impact of that development on the Grade II listed Lucas Farm in particular.

- **Part 2, point 11, Local Road Access:** The access to site 68 and 69 of the Jeffreys Farm sites is discussed in detail in the section on site 68. Site access is proposed on to Sugar Lane – close to the junction with Jefferies, and should be considered to only be of minor to moderate impact. Comments regarding there being a *‘reliance on the private car in this location’*, should be noted for all sites in Horsted Keynes, as the distance to amenities is no different for Site 69 to other allocated sites.
- **Part 3, point 16, Services:** The distance from the site to the village centre has been incorrectly allocated to a 10 to 15 minute walk. The distance is 639m (as measured on Promap), so should be classed as a **10 min walk** if following the MSDC guidelines (as per MSDC Site Selection Paper 2 - Methodology for Site Selection).
- Comments regarding AONB impact, access and services have been raised previously with Mid Sussex planning, both in May 2019 when the proformas were sent out to landowners to ‘fact check’, and also when the documents were released in September 2019, prior to the scrutiny committee reviewing them. They have not been amended in the current form of the Sustainability appraisal for Regulation 19 consultation.

Site SHELAA 69 conclusions:

The sustainability assessment for site 69 Jeffrey's Farm Northern Fields is fundamentally flawed due to **disputable** and **incorrect information** being used to assess the site. The advice of a high impact on the AONB is able to be successfully mitigated through targeted planting, and a well thought out development that would reflect similar style residential housing comparable to that along the southern extension of Sugar Lane, namely Treemains Road. The existing mature hedge lines and the proposed planting schemes will mitigate any impact on the listed buildings, and the access as proposed will also not impact on them. This provides evidence that site 69 should be deemed **accessible**, and the impact on the AONB that can be **successfully mitigated**, and hence be judged to be **sustainable**, and **included in the allocated sites as a realistic reasonable alternative to other sites in the village.**

Site SHELAA 971 - Land at Jeffreys Farm (Fields to South of farm buildings)

Information in the Site SHELAA 971 proforma (page 247-248 of Site selection paper 3 Appendix B Housing site proformas), is incorrect, and has been mistakenly used to dismiss the site from allocation.

- **Part 1, point 1, AONB:** The AONB had advised that they consider a development of this site would be ‘High impact’, citing *‘High impact on AONB due to loss of medieval field and development out of character with the settlement pattern of Horsted Keynes. Undulating field to south of farmyard. No watercourses mapped. Jeffrey's Farm is a historic farmstead separated from the village by Sugar Lane. This site is detached from any existing part of the settlement. The western side of Sugar Lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area. Sugar Lane and Keysford Lane are historic routeways. There is an area of Ancient Woodland to the south-west of the*

site and mature trees on field boundaries. Part of medieval field system. Given the probable age of Jeffrey's Farmhouse it is likely that the whole farmstead is medieval in origin. No views into the site from public viewpoints due to mature hedgerows and trees and residential curtilages.'

- I have outlined in the section on site 69 that the AONB assessment of sites was a desk top exercise, and the advice is not a measurable indicator, and purely qualitative. This is also apparent in the assessment of site 971 as it is clear that the site is NOT '*detached from any existing part of the settlement*', and abuts directly adjacent to the rear of residential housing on the western side Treemans Road, so a development if designed properly would not be '*uncharacteristic of this area*'.
- The site is not a complete '*medieval field system*'. The field system is only partial due to the insertion of housing including The Cottage, Smarties, Twittens and Pypers on Treemans Road. Other medieval field systems are being proposed for site allocation in Horsted Keynes (notably sites 184 (SA28) and 807 (SA29)), so mitigation must be possible.
- The AONB description includes that '*The western side of Sugar Lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area.*'. This site is not related to Sugar Lane as it is set behind residential housing on Treemans Road, so a development would be directly adjacent to existing housing stock. Mitigation could include a well thought out design that would compliment this housing, and show similar characteristics.
- Given '*No views into the site from public viewpoints due to mature hedgerows and trees and residential curtilages.*', it seems that little mitigation would be necessary for the visual impact, but we would propose an increase in the landscaping to maintain this screening in the future, and to buffer the site from the ancient woodland to the south.
- All of the above shows evidence that the description of the impact on the AONB does not reflect the site, and a reassessment with the correct information would result in an assessment of '**Low**' to '**Moderate**' for AONB Impact.
- **Part 2, point 11, Local Road Access:** Denoted as '*significant improve*', citing '*Access via existing farm track. In this location, there could be significant conflict with the existing junction (creating a crossroads). It has not been demonstrated that a satisfactory access can be achieved to the site. Insufficient provisions in the locality suggest that the site is likely to be over reliant on private car use.*'
 - As for site 68, mitigation to provide a safe access is possible as land either side of the access track (including the field to the north of the track often referred to as the 'Front Field') is **in the same ownership** as the site, enabling an alternative access to be proposed (refer to Land registry documents as attached to this email as Appendix 1). A plan as seen for site 68 (Appendix 6) would create a safe and suitable access to the site, showing there are no access issues for site 971.
 - Recent planning applications on the farm sites (refer to DM/16/3974 and DM/19/0957) proposed an access to the site to the north of the existing access, further north along Sugar Lane, where visibility splays are possible without the loss of mature trees, and the access does not conflict with the existing junction (see Appendix 7). These planning applications and associated access plans saw **no**

objection raised by WSCC Highways. This access road could be utilised for access to site 971, but alternatively an improved junction at the existing farm track could also be achieved, as seen in the above cited plans. This information gives evidence that there is no access issue for site 971.

- As per site 68, the land proposed for a safe access (the 'Front Field') is subject to a covenant, but this does not restrict access across the land. A copy of the covenant is attached to this submission as Appendix 2, showing there are no access issues for site 971.
- As per site 68, the details of the covenant verified legally by a barrister on the Attorney General's Panel of Counsel in the Radcliff Chambers in London. A copy of the barristers comments is attached to this submission as Appendix 3, showing there are no access issues for site 971.
- All of the above shows evidence that access is possible and should be taken in to account when assessing the access to the site, and we believe a reassessment using the MSDC guidelines for site sustainability assessment, would result in an assessment of '**Minor**' to '**Moderate**' for site access.
- These comments on access have been raised previously with Mid Sussex planning, both in May 2019 when the proformas were sent out to landowners to 'fact check', and also when the documents were released in September 2019, prior to the scrutiny committee reviewing them. They have not been amended in the current form of the Sustainability appraisal for Regulation 19 consultation.

Site 971 conclusions:

The sustainability assessment for site 971 Jeffreys Farm, Southern fields is fundamentally flawed due to **disputable** and **incorrect information** being used to assess the site. The issues around access are unfounded, and the advice of a high impact on the AONB is able to be successfully mitigated through planting and a well thought out development that would reflect similar style residential housing directly adjacent to the site bounding the western side of Treemans Road. This provides evidence that site 971 should be deemed **accessible**, and that the impact on the AONB can be **successfully mitigated**, and hence should be judged to be **sustainable**, and **included in the allocated sites as a realistic reasonable alternative to other sites in the village.**

SA29 - Site 184 - Land South of St Stephens Church

Information in the Site 184 (SA29) proforma (page 235-236 of Site selection paper 3 Appendix B Housing site proformas), should be further scrutinised as the site assessment does not appear to be consistent with other sites in the village – namely the sites at Jeffreys Farm.

- **Part 1, point 1, AONB:** The AONB had advised that they consider a development of this site would be 'Low impact'. The assessment states that '*Low impact on AONB. Reasonably flat site but high. No watercourses mapped. Immediately to south of modern development in Hamsland. Reasonably well-related to village depending on design. Hamsland follows the route of a historic PROW. No woodland on or adjacent to site but mature trees on boundaries*

and within site. Part of a medieval field system according to HLC, but not intact due to church and development inserted along Hamsland. Some limited views from Hamsland’.

Following my challenge to the AONB (outlined in Appendix 4 of this submission) there are inconsistencies in their assessment. The response from the AONB to this challenge (Appendix 5 of this submission) highlights some comments that should be considered when assessing site 184 for allocation.

- The AONB state that *‘This was a desktop assessment based on the AONB Unit’s datasets (metadata included within the reports) and it was clearly stated that they [the assessments] would need to be supplemented by evidence on visual impact.’*
- *‘The AONB assessment relates to historic settlement pattern [and] Twentieth century additions to the village are not relevant to this assessment.’*
- Site assessments *‘did not take into account any further information provided by developers for the SHELAA or to support planning applications’*
- The AONB state that *‘The removal of mature trees to access site 184 was not considered as part of the AONB assessment because this information was not available in the SHELAA’.*
- The AONB also state that the *‘site 184 is immediately to the south of modern development in Hamsland and is reasonably well-related to the village depending on design’*
- The AONB state that *‘continuous development on both sides of Hamsland up to the site and the field is not legible as part of a separate farmstead’*
- The AONB assessment is meant to represent the *‘historic settlement pattern’*, so the proximity of the site to the *‘modern development in Hamsland’*, and that the *‘continuous development on both sides of Hamsland up to the site and the field is not legible as part of a separate farmstead’* should not be considered to enable the development to be considered to be *‘well-related to the village’*. Historically the site is a **medieval field system**, that would have been associated with the Wyatts estate, so the site should be described as being *‘out of character with the settlement pattern’*.
- The AONB have not considered the *‘The removal of mature trees to access site 184’*, yet this distinctive and notable tree line should be considered in their assessment. This should increase the impact from ‘Low’ to ‘moderate’ at least, and assessments for the development plan should include information from developers regarding site specific plans, and these should be fed in to the AONB assessments, especially if it involves the removal of mature trees and hedgeline. The developers current plans show that the access will disrupt the roots of many mature trees along a length of the access road, being within 2m of the tree trunks.
- **Part 2, point 11, Local Road/Access:** The assessments states that there are no issues with site access, and that *‘Access to site can be achieved’*. Given information received by Horsted Keynes Parish Council and openly discussed in council meetings, the developer has stated that there will need to be a 5 meter protection zone adjacent to the mature trees along the western edge of the access track, to protect and retain the distinctive tree line. How is access considered available when the access track is only 7m wide? The land to the east of the access is NOT in the developers ownership, so access is **restricted by third party land ownership**. This access should be reassessed as ‘Severe’, until land is purchased and access

is proven to be viable without affecting the tree belt along the access road, including suitable visibility splays.

- **Part 2, point 13, Infrastructure:** The assessments states that there is '*Potential to improve Infrastructure*', and that there is '*Potential for improvements to existing highway at Hamsland*'. Any highway 'improvements' would require the widening of the road through the single access road to the site, which would involve the removal of green verges and the construction of pedestrian barriers to enable the level differences to be safely maintained. This is not an 'improvement' and is making a village environment distinctly city like, and would be a severe impact on the residents of Hamsland and Challoners. Hamsland is a cul-de-sac accessed by a road with permanent parking issues, making it a single track entrance and exit, with stress on the infrastructure already. No mitigation has been suggested for the effects of additional traffic and the safety and well-being of the 129 existing households serviced along the same single track road.

Site 184 conclusions:

The sustainability assessment for site 184 Land South of St Stephens Church is fundamentally flawed due to **disputable** and **incorrect information** being used to assess the site. The access statement should be reconsidered, and the advice of a low impact on the AONB is disputable if the tree line along the western access boundary will be damaged or removed. This provides evidence that site 184 should be reconsidered for allocation in the draft plan.

SA28 - Sites SHELAA 216/807 - Land at Police House Field

Information in the Site 216/807 proforma (pages 241-242 of Site selection paper 3 Appendix B Housing site proformas), should be further scrutinised as the site assessment does not appear to be consistent with other sites in the village – namely the sites on Jeffreys Farm. In addition, no separate sheet is available for site 216 in the Site selection paper 3 Appendix B Housing site proformas, so how can a comparison be made when assessing the site as a reasonable alternative?

- **Part 1, point 1, AONB:** The AONB had advised that they consider a development of this site (the allocated site 807) would overall be 'Moderate impact'. The assessment initially states that '*High impact on AONB due to loss of medieval fields and development too isolated and separate from existing village core uncharacteristic of its settlement pattern. If access available from Birchgrove Road and development restricted to northern field, impact would be moderate. Slightly sloping to south, no watercourses mapped. Site comprises two fields to the south of row of houses along Birchgrove Road. The northerly field is better related to the settlement than the southerly one. Access via Birchgrove Road (via site 216) would be needed to integrate with the village. Access onto Danehill Lane would make development too isolated and separate from existing village core. Birchgrove Road and Danehill Lane are historic routeways. No woodland on or adjacent to the site but some mature trees in field boundaries. Part of a medieval field system. Limited view of site from Danehill Lane access.*'. Following my challenge to the AONB (outlined in Appendix 4 of this submission) there are inconsistencies in their assessment. The response from the AONB to this challenge (Appendix 5 of this submission) highlights some comments that should be considered when assessing site 807 for allocation.

- The AONB state that *'This was a desktop assessment based on the AONB Unit's datasets (metadata included within the reports) and it was clearly stated that they [the assessments] would need to be supplemented by evidence on visual impact.'*
- *'The AONB assessment relates to historic settlement pattern [and] Twentieth century additions to the village are not relevant to this assessment.'*
- Site assessments *'did not take into account any further information provided by developers for the SHELAA or to support planning applications'*
- *'No information was available at the time of the AONB assessment suggesting that mature trees or hedgerows would need to be removed so this was not taken into account' .*
- *'site 216 would continue the line of cottages along Birchgrove Road and the northern part of site 807 would continue development behind this'.*
- The AONB assessment is relating to *'historic settlement pattern'*, so the description of the site to *'to the south of row of [modern] houses along Birchgrove Road'* and that *'The northerly field is better related to the settlement than the southerly one'*, should not be considered to enable the development. Historically the site is **medieval field system**, that would have been associated with the Lucas Farm, so the site could thus be described as being *'out of character with the settlement pattern'*.
- The removal of the hedgeline and possibly mature trees to gain visibility splays and access to the site along the Birch Grove Road *'was not taken into account'* by the AONB assessment. This should increase the AONB impact from 'Moderate' to 'High', and assessments for the development plan should include information from developers regarding site specific plans, and these should be fed in to the AONB assessments, especially if the removal of mature trees or hedgelines is required for access. The recent access plans provided by the developer show the visibility splays to directly abut the trunk of the large characterful oak tree at the entrance to the village. This must have an impact on the tree roots and the tree itself to have new tarmac placed right against the trunk, and thus this critical threat should be reflected in the AONB assessment.
- **Part 1, point 5, Listed buildings:** The sustainability assessment states that *'Grade II-listed Lucas Farm is located to the north of the site'* and that this will have *'Less Than Substantial Harm (Medium)'* impact. It does not comment on the old barn and farm yard that used to be on site 216/807, that would have been closely connected to the Lucas Farm assets. The impact assessment seems at odds with the location of the listed building, it being directly opposite the site and not screened from the site by any vegetation that will be retained. To compare this with the assessment of the listed buildings associated with site 69 the impact was deemed to be the same yet the visibility is described as *'some views of the site from the upstairs rear windows of the farmhouse can be afforded through gaps in the hedgeline, particularly in winter months'*, and that *'the tree belt is well established, there are some views through the gaps to the site behind, particularly in winter months'*. This discrepancy highlights inconsistencies in the impact assessments on listed buildings within the settlement and I believe the impact of developing site 807 should be reassessed as 'High impact' on the listed building and its historic setting.

Site 807 conclusions:

The sustainability assessment for site 807 Land at Police House Field is fundamentally flawed due to **disputable information** being used to assess the site. The impact the Grade II listed Lucas Farm

should be reconsidered, and the advice of a moderate impact on the AONB is disputable as the removal of mature trees and hedgeline along Birch Grove Road has not been assessed, and the medieval field systems and historic barn and yard were clearly associated with and proximal to Lucas Farm, thus a development would be *'out of character with the settlement pattern'*. This provides evidence that site 807 should be **reconsidered** for allocation in the draft plan.

Conclusions:

This part of my submission to Regulation 19 consultation has focused on the corrections that should be made to the sustainability assessments for the sites in Horsted Keynes. The assessments have been **flawed** due to the **incorrect assumptions** being made, or **wrong data** being used for different aspects of the sustainability assessment. **This has had a direct impact on which sites have been selected and which have not.** Sites should be assessed on an even playing field, and correct information is necessary for this to be achieved.

The occurrence of fundamentally incorrect information does bring in to question the level of scrutiny that has been applied to the site selection process itself. I understand that there are several sites, including those in Folders Lane, Burgess Hill that also feel there was a lack of scrutiny in the final process of selection. Having been present at committee meetings prior to the publication of the DPD documents throughout the process it was clear that there were councillors who were also concerned that the documents were being rushed through to meet a time line rather than being adequately QC'ed. It was clear that the issue became partisan and the party line was drawn to push these documents through the process. A time line should not detract from the accuracy of information and ultimately a defensible conclusion in the allocation of sites in the MSDC Draft Development Plan.

I sincerely hope that the extensive information and evidence I have provided will be used to make suitable corrections to the sustainability assessments of the sites in Horsted Keynes.

Should you have question or need clarification on any of the information please contact me on

[REDACTED]

Appendixs to submission to be considered in conjunction with this document

Appendix 1 = Title deed for the land at Jeffreys Farm being promoted – showing access is not in 'third party ownership'.

Appendix 2 = Title deeds for the Farmhouse at Jeffreys Farm, the owner of whom is beneficiary of a covenant on the land that would enable a safe access to be achieved (often referred to as the 'Front Field'). This covenant does **not restrict** the building of an access road to access the sites being promoted.

Appendix 3 = The opinion of a barrister as to the wording of the covenant on the 'Front Field' to which access is proposed for a safe access. This covenant does **not restrict** the building of an access road to access the sites being promoted.

Appendix 4 = Challenge to the AONB assessment of site 69 at Jeffreys Farm – September 2019

Appendix 5 = AONB response to the challenge to the AONB assessment of site 69 at Jeffreys Farm

Appendix 6 = Access plan showing safe visibility splays to the sites at Jeffreys Farm – proximal to the existing farm entrance

Appendix 7 = Transport statement including access plan showing safe visibility splays to the sites at Jeffreys Farm – opposite Jefferies as per the previous planning applications DM/16/3974 and DM/19/0957.

Appendix 8 = Visual Impact Assessment that was part of the planning application DM/16/3974

Title Number : WSX381300

This title is dealt with by HM Land Registry, Durham Office.

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

Neither this extract nor the full copy is an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy.

This extract shows information current on 13 SEP 2019 at 12:37:54 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

REGISTER EXTRACT

Title Number	: WSX381300
Address of Property	: Land on the West side of Sugar Lane, Horsted Keynes, Haywards Heath
Price Stated	: £323,500
Registered Owner(s)	: HELENA MARY GRIFFITHS [REDACTED] [REDACTED] SARAH JANE BAILEY [REDACTED] [REDACTED] TIMOTHY HUGH JOHN GRIFFITHS [REDACTED] [REDACTED] PETER WILLIAM MATTHEW GRIFFITHS [REDACTED] [REDACTED]
Lender(s)	: None

Title number WSX381300

This is a copy of the register of the title number set out immediately below, showing the entries in the register on 13 SEP 2019 at 12:37:54. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

This copy is not an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy. If you want to obtain an official copy, the HM Land Registry web site explains how to do this.

A: Property Register

This register describes the land and estate comprised in the title.

WEST SUSSEX : MID SUSSEX

- 1 (20.09.2007) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land on the West side of Sugar Lane, Horsted Keynes, Haywards Heath.
- 2 (20.09.2007) The land has the benefit of the rights reserved by but is subject to the rights granted by the Transfer dated 12 April 1990 referred to in the Charges Register.
- 3 (20.09.2007) The land has the benefit of the rights reserved by but is subject to the rights granted by a Transfer of land adjoining Jeffreys Farmhouse dated 12 November 1992 made between (1) George Frederick Colin Griffiths and (2) Richard Alan Vince and Celia Margaret Vince.

NOTE: Copy filed under WSX312715.

- 4 (20.09.2007) The land has the benefit of the rights reserved by but is subject to the rights granted by a Transfer of land adjoining the Western boundary of the land in this title dated 29 January 1998 made between (1) George Frederick Colin Griffiths and (2) Timothy Hugh John Griffiths.

NOTE: Copy filed under WSX220004.

- 5 (23.03.2009) The land has the benefit of the rights reserved by but is subject to the rights granted by the Transfer dated 11 March 2009 referred to in the Charges Register.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (02.06.2016) PROPRIETOR: HELENA MARY GRIFFITHS [REDACTED] and SARAH JANE BAILEY [REDACTED] and TIMOTHY HUGH JOHN GRIFFITHS [REDACTED] and PETER WILLIAM MATTHEW GRIFFITHS [REDACTED]
- 2 (02.06.2016) The value stated as at 2 June 2016 was £323,500.
- 3 (02.06.2016) RESTRICTION: No disposition by a sole proprietor of the registered estate (except a trust corporation) under which capital money arises is to be registered unless authorised by an order of the court.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (20.09.2007) A Conveyance of the land in this title and other land dated 2 September 1957 made between (1) The Ashdown And General Land Company and (2) George Frederick Colin Griffiths contains restrictive covenants and reserves rights.

NOTE: Copy filed under WSX312715.

- 2 (20.09.2007) The land is subject to the rights granted by a Conveyance of an electricity sub-station site dated 17 April 1961 made between (1) George Frederick Colin Griffiths (2) The Agricultural Mortgage Corporation Limited (3) Lily Margaret Kerly and Beatrice Brooks and (4) The South Eastern Electricity Board .

NOTE: Copy filed under WSX312715.

- 3 (20.09.2007) A Transfer of Jeffreys Farmhouse dated 12 April 1990 made between (1) George Frederick Colin Griffiths and (2) Richard Alan Vince and Celia Margaret Vince contains the restrictive covenants by the Vendor.

NOTE: Copy filed under WSX312715.

- 4 (23.03.2009) A Transfer of Jeffreys Farm Cottage dated 11 March 2009 made between (1) George Frederick Colin Griffiths and (2) Mary Veronica St Clere Griffiths and Helena Mary Griffiths contains restrictive covenants by the transferor.

NOTE: Copy filed under WSX326927.

- 5 (02.06.2016) A Transfer of the land in this title dated 11 May 2016 made between (1) Mary Veronica St Clere Griffiths and (2) Helena Mary Griffiths, Sarah Jane Bailey, Timothy Hugh John Griffiths and Peter William Matthew Griffiths contains restrictive covenants.

NOTE: Copy filed.

- 6 (02.06.2016) The land is subject to any rights that are reserved by the Transfer dated 11 May 2016 referred to above and affect the registered land.

End of register



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This is a copy of the title plan on 13 SEP 2019 at 12:37:54. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

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HM Land Registry endeavours to maintain high quality and scale accuracy of title plan images. The quality and accuracy of any print will depend on your printer, your computer and its print settings. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by HM Land Registry, Durham Office.

These are the notes referred to on the following official copy

Title Number WSX312715

The electronic official copy of the document follows this message.

This copy may not be the same size as the original.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

H M LAND REGISTRY

Land Registration Acts 1925 to 1986

TRANSFER OF PART (Rule 72)

Imposing Fresh Restrictive Covenants



COUNTY AND DISTRICT : WEST SUSSEX - MID SUSSEX
NEW TITLE NUMBER :
LAND TRANSFERRED : Jeffreys Farmhouse Jeffreys Farm
Horsted Keynes West Sussex

DATED : 12 April

PRODUCED
- 3 MAY 1990
FINANCE ACT 1991

DEFINITIONS

The Plan : The plan attached hereto

The Property : Jeffreys Farmhouse situate on and forming
part of Jeffreys Farm Horsted Keynes
West Sussex and for identification only shown
edged red on the plan and where the context
admits each and every part thereof as

The Retained Land : Jeffreys Farm Horsted Keynes and where the
context admits each and every part thereof as
comprised in the assurance to the Vendor dated
the Second day of September One thousand nine
hundred and fifty seven but excluding the
Property

Services : Water soil gas electricity drainage
telephones and similar services



Service Media : Pipes wires drains cables conduits aerials
water courses gutters soakaways and other
similar installations for the passage of any of
the services

Vendor : GEORGE FREDERICK COLIN GRIFFITHS
[REDACTED]

Purchaser : RICHARD ALAN VINCE and CELIA MARGARET VINCE
[REDACTED]

Price : TWO HUNDRED AND SEVENTEEN THOUSAND POUNDS
(£217,000)

1. IN consideration of the price (the receipt whereof is hereby acknowledged) the Vendor as beneficial owner transfers the Property to the Purchaser subject to :-

- (a) The exceptions and reservations contained or referred to in the assurance of Jeffreys Farm to the Vendor dated 2nd September 1957
- (b) the provisions of a Conveyance dated 17th April 1961 made between the Vendor (1) Agricultural Mortgage Corporation (2) Lily Margaret Kirby and Beatrice Brooks (3) South Eastern Electricity Board (4)
- (c) to the exceptions and reservations in the terms detailed in the First Schedule hereto and which so far as not already in existence are reserved by this Transfer but together with the benefit of the rights in the terms detailed in the Second Schedule hereto and which so far as not already in existence are granted by this Transfer

2. THE Vendor covenants with the Purchaser in manner specified in the Third Schedule
3. THE Purchaser covenants with the Vendor in manner specified in the Fourth Schedule
4. THE Vendor and Purchaser agree and declare in the terms detailed in the Fifth Schedule

FIRST SCHEDULE

Exceptions and Reservations for the benefit of the Retained land and which are to be exercised in common with the Vendor and all others who may have or be entitled to or to whom the Vendor may grant like rights

- (a) To the passage of the services through the service media now laid in on over or under the Property
- (b) To construct and lay such further service media in on over or under the Property as may be required and to make connections to any such service media in on over or under the Property now laid under the property and thereafter to the free passage of services through all such service media
- (c) To construct any buildings on or over the Retained land directly up to any boundary of the Property such that gutters eaves downpipes foundations or other projections may protrude into the Property and to key into any buildings on or over the Property
- (d) To enter on to so much of the Property
 - (i) for the exercise of any of the rights referred to in this Schedule
 - (ii) for the purpose of inspecting maintaining cleaning repairing replacing renewing removing or rebuilding any service media in on over or under the Property and any

building now or hereafter erected on or adjoining any
boundary between the Property and the Retained land and

(e) The full and free right of access of light and air or other easements to any building erected or to be erected on the Retained land notwithstanding that the same may interfere with or restrict the user of the Property

(f) All such other rights easements quasi rights and quasi easements of a continuous nature hitherto used and enjoyed in connection with the Retained land and each and every part thereof and over the Property as if the same had always been in separate ownership and such rights easements quasi rights and quasi easements had been acquired by prescription

SECOND SCHEDULE

Rights granted for the benefit of the Property and which are to be exercised in common with the Vendor and all others who may have or be entitled to or to whom the Vendor may grant like rights

(a) rights similar to those contained in clauses (a) (until such time as the works referred to in Clause (b) of the Fourth Schedule hereto have been completed), (c) and (d) of the First Schedule (mutatis mutandis) and provided that none of the said rights shall be exercisable by the Purchaser in on over or under that part of the Retained land comprising "The Cottage" (as shown on the plan) and the garden ground and land appurtenant thereto

(b) to pass and repass with or without vehicles or animals at all times of the day or night and for all purposes connected with the use and enjoyment of the Property as a private dwelling over and along the driveway cross hatched in black over the Plan

THIRD SCHEDULE

Covenants by the Vendor
(for the benefit of the Property)

The Vendor hereby covenants :-

- (I) not to erect any building of any type on the land edged yellow on the plan with the exception of a sports pavilion with storage and toilet facilities ancillary thereto but not within the area bounded by points X Y Z on the Plan and
- (II) to keep the driveway cross hatched in black on the plan in a good state of repair and condition

FOURTH SCHEDULE

Covenants by the Purchaser
(for the benefit of the Retained land)

- (a) Within two months of the date hereof and prior to carrying out any works upon the Property to erect stock-proof fencing upon all boundaries of the Property marked with a 'T' and thereafter to maintain the same in good repair and condition
- (b) Within six months hereof to lay and construct a new drainage system for both foul and surface water wholly within the boundaries of and serving the Property exclusively and immediately thereafter to disconnect the Property from any existing drainage service media which shall be left in a good and safe state of repair and condition all which said work shall be carried out to the Vendor's reasonable satisfaction
- (c) Not to erect or convert or adapt the buildings on the Property to provide more than one residential unit without the Vendors prior

written consent which shall not be unreasonably withheld

(d) Not to carry out any alteration addition or extension to the Property unless the plans elevations and specifications thereof have first been approved in writing by the Vendor or his Surveyor whose reasonable costs in connection with this clause shall be paid by the Purchaser. The Vendor shall not unreasonably withhold or delay approval

(e) No caravan house on wheels chattel or structure adapted or intended for use as a dwelling or sleeping apartment shall be erected made placed or used or be allowed to remain on the Property

(f) No earth sand gravel or other material shall be dug out excavated or removed from the property except for the purpose of and laying service media or for the laying of garden paths

(g) No trade manufacture business or profession of any kind shall at any time be set up or carried on or upon the Property

(h) Not to do anything or permit anything to be done on the Property which may be or become a nuisance or annoyance or disturbance to the Vendor or the owners or occupiers of the Retained land and without prejudice to the generality of the foregoing not to permit the use of any radio or cassette player/recorder or other similar device to be played nor shall any singing music or excessive noise be permitted so as to be audible on any part of the Retained land

(i) not to obstruct park or allow to be parked any motor car or other vehicle or other means of transport on the driveway cross hatched black on the plan

(j) to pay and contribute a fair proportion according to user of the cost of inspecting maintaining cleansing repairing replacing and renewing the driveway cross hatched black on the plan and any service

media used in common with the Vendor or others

(k) not to make any connections to the service media so as to cause the same to become overloaded or subject to excessive use wear or tear

(l) to make good to the Vendor's satisfaction all outbuildings and any fences or other structures now or hereafter erected on the Property which are on or immediately adjacent to any boundary between points "A" and "B" on the plan

(m) not to grant or except or reserve any easements over the land cross hatched black on the plan or in respect of any service media

FIFTH SCHEDULE

(Agreements and Declaration)

(a) Insofar as necessary or applicable the Perpetuity period applicable hereto shall be the period of eighty years from the date hereof

(b) The said rights easements exceptions and reservations are valid only if first exercisable within the Perpetuity period referred to and are subject to the person exercising the same :-

(i) paying a fair proportion of any expense necessarily incurred in inspecting maintaining repairing and renewing them

(ii) in the case of rights of entry to enter only on to so much of the Property or the Retained land (as applicable) as is necessary effecting entry on reasonable notice at a reasonable time of the day (except in case of emergency in each case) causing as little damage as possible and making

good to the reasonable satisfaction of such persons
thereby affected any damage caused

(c) The covenants herein contained are limited to seisin

(d) Covenants by more than one person shall be treated as being
joint and several

(e) The singular shall include the plural and the neuter shall
include the masculine or the feminine as appropriate and vice versa in
each case

(f) The Purchasers hereby declare that the survivor of them
can/~~cannot~~ give a valid receipt for capital money arising on a
disposition of the land

(g) The expressions "the Vendor" and "the Purchaser" shall extend to
their respective successors in title

SIGNED SEALED AND DELIVERED by)

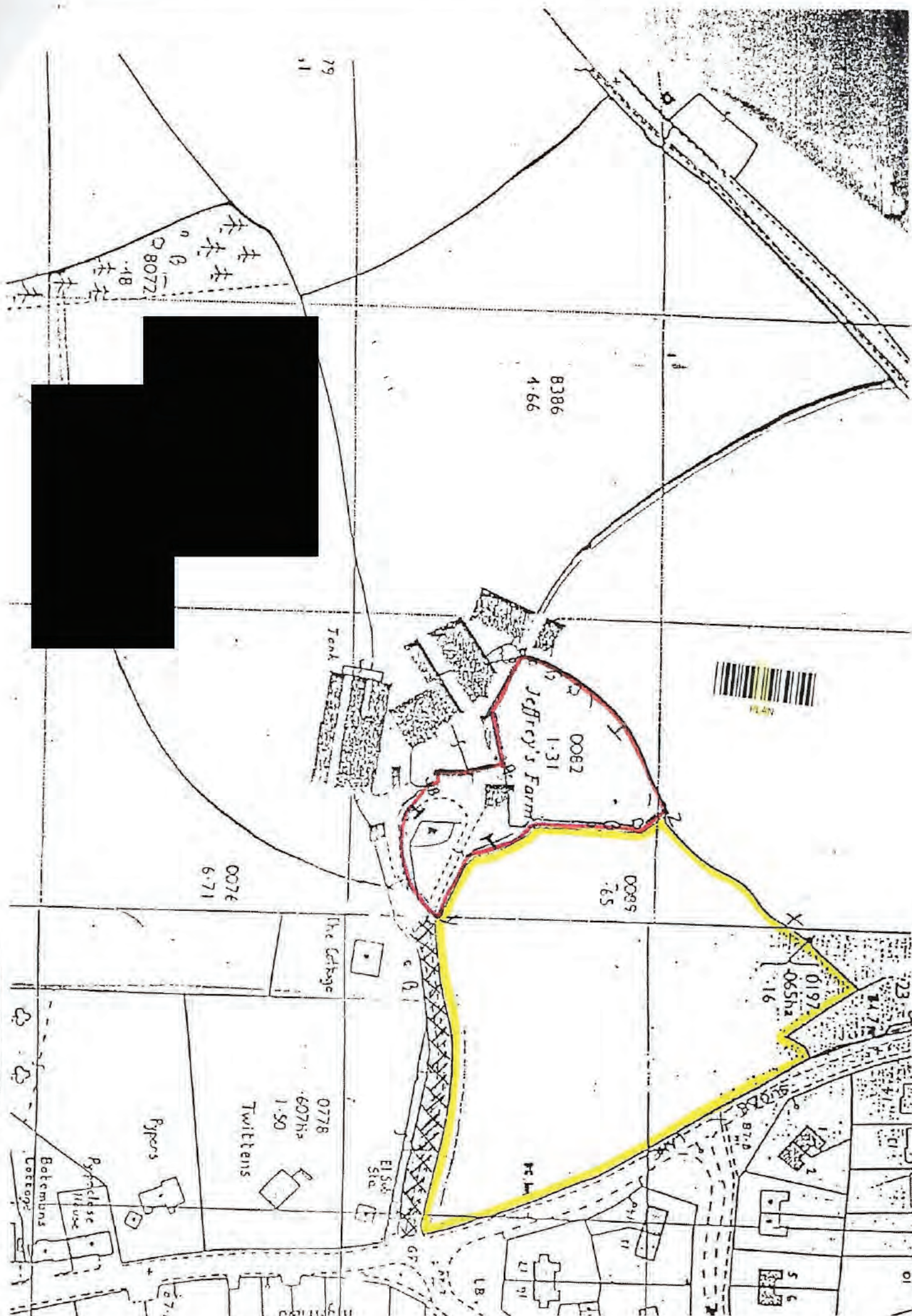
the Vendor in the presence of:-)

SIGNED SEALED AND DELIVERED by)

the Purchaser in the presence)

of :-)

P. M. SCAMPTON
SOLICITOR
22 SUSSEX ROAD
HAYWARDS HEATH
WEST SUSSEX



9th September 2016

RE: LAND AT JEFFREYS FARM, HORSTED KEYNES, WEST SUSSEX

OPINION

Instructions

1. I am instructed to advise various members of the Griffiths family on the meaning and effect of a restrictive covenant contained in a transfer of freehold land in West Sussex dated 4th April 1990.
2. My conclusions are set out briefly in paragraph 6 below. The full reasoning for my conclusions follows in paragraphs 7 onwards.

Relevant facts

3. The relevant facts are as these. George Griffiths was the freehold owner of land in Horsted Keynes, West Sussex, known as Jeffreys Farm, which had been conveyed to him on 2nd September 1957.¹ In 1990 he decided to sell part of this land, specifically Jeffreys Farmhouse, to a Mr and Mrs Vince for £217,000. This was achieved by a transfer of part ("the Transfer") dated 12th April 1990. By clause 2 of the Transfer, Mr Griffiths covenanted with Mr and

¹ By an assurance of that date. I do not know whether Mr Griffiths acquired his land in Horsted Keynes pursuant to any further conveyances, but that is not material for present purposes.

Mrs Vince in the manner specified in the Third Schedule to the Transfer. That Schedule imposed restrictive covenants over the land being retained by Mr Griffiths for the benefit of the land being transferred. The material covenant is in the following terms:-

"The Vendor hereby covenants ... not to erect any building of any type on the land edged yellow on the plan with the exception of a sports pavilion with storage and toilet facilities ancillary thereto but not within the area bounded by points X Y Z on the Plan."

The "land edged yellow" is shown on the plan attached to the Transfer. It is immediately adjacent to Jeffreys Farm and was no doubt part of Mr Griffiths' "Retained Land" as defined on the first page of the Transfer.²

4. Mr Griffiths has since died. The Retained Land, including the land edged yellow, is now in the ownership of his widow and adult children. Mr and Mrs Vince still live at Jeffreys Farmhouse. Architects' plans³ have been prepared, on behalf of one of more members of the Griffiths family, for a residential housing development on part of the Retained Land, from which I see that no housing is intended to be built upon the land edged yellow and that the only parts of the development intended to encroach onto the land edged yellow would be "a community building",⁴ an access road, together with its ancillary

² The Retained Land is defined in the Transfer as "Jeffreys Farm ... as comprised in the assurance to the Vendor dated [2nd] September [1957] but excluding [Jeffreys Farmhouse]". I have not seen the 1957 assurance, but have proceeded on the basis that the "land edged yellow" lies within the Retained Land.

³ By Ramsay & Co Landscape Architecture. I have been provided with a helpful drawing entitled "Figure 03: Proposed Development and Mitigating Planting Scheme".

⁴ My instructions refer to this community building as a sports hall. I can see from the architects' drawing that it is located away from the triangle of land marked X Y Z on the Transfer plan. I have not been asked to consider the meaning of "sports pavilion with storage and toilet facilities ancillary thereto". I merely observe, for the present, that I doubt very much whether a "sports hall" is an interchangeable definition for a "sports pavilion". Certainly, a "community building" could be a very different sort of building from a sports pavilion. Care will need to be given to the detailed design of any such building if it is not to breach the covenant.

infrastructure, including pavements, and a pedestrian walkway serving the development. I am told that no street lighting is planned along the access road at the present time.

5. I am asked whether the building of the access road on the land edged yellow would be a breach of the restrictive covenant.

Conclusions in brief

6. In summary, and having regard to the architect's drawing provided to me, I consider that the construction of the access road on the land edged yellow would not constitute the erection of a building within the meaning of the covenant in Transfer and that therefore there would be no breach of covenant. As to whether the construction of the "community building" would be a breach of covenant, I have made some preliminary observations in footnote 4 above. My reasons for these conclusions now follow.

Legal analysis

7. In common parlance, a road and pavements would not ordinarily or obviously fall within the definition of "a building of any sort" but the matter is by no means entirely straightforward. In some reported cases, structures have been held to fall within the definition of a "building" which might at first sight appear to be odd or surprising. It is ultimately a question of construing the words of the covenant in the light of what action or activity the covenant is prohibiting (or permitting). Before considering the relevant cases and explaining the principles of construction in more detail, it will be useful to highlight the relevant words (in bold italics below) under consideration in this case:-

- *not to erect* ... (note the use of the verb “to erect” rather than, for example, to construct, or to build etc; this is significant);
- *any building* ... (note the choice of building rather than structure etc, and the restriction to a single word description);
- *of any type* ... (query whether this adds anything);
- *with the exception of a sports pavilion* ... (clearly a sports pavilion is a particular type of building).

8. Unless the context otherwise requires, the starting point for the construction of covenants is the natural and ordinary meaning of the words used or their conventional usage.⁵ In the face of a clear meaning, it is not the function of the court to find ambiguities; nor should the *contra proferentem* rule for resolving ambiguities be used to create an ambiguity which according to the ordinary meaning of the words is not there. The essential question of construction is the meaning that the words in the deed would convey to a reasonable person having all the background knowledge that would have been reasonably available to the parties in the situation in which they were at the time of the contract. Knowledge is to be gained from the whole deed and also from such other background knowledge as the reasonable person would consider relevant. A particular word is thus considered in the context of the clause within which it is found and as used elsewhere in the same document and also in the context of the admissible relevant background.

9. In a fairly recent judicial review case,⁶ the Court of Appeal had to consider the meaning of the word “building” in the context of the Cremation Act 1902 and associated regulations made under statutory instrument. An orthodox Hindu

⁵ *Investors Compensation Scheme Ltd-v-West Bromwich Building Society* [1997] UKHL 28; [1998] 1 WLR 896 HL.

⁶ *R (Ghai)-v-Newcastle City Council* [2009] EWHC 978 Admin; [2011] QB 591.

had requested the local authority to dedicate land for traditional open air funeral pyres. The authority had refused on the basis of legislative provisions relating to cremation contained in the 1902 Act. The claimant sought judicial review of the authority's refusal (on the grounds that it breached his article 9 rights under the ECHR), which was dismissed. The claimant then appealed, conceding that his religious belief would be satisfied by cremation within a structure, rather than fully in the open air, provided that the process was by traditional fire and sunlight could shine directly on his body. The issue therefore arose whether the claimant's cremation could reasonably be achieved in such a structure, having regard to the definition of a crematorium as a "building" in section 2 of the 1902 Act. The appeal was allowed on the grounds that, having regard to the legislative context and to the aims of the provisions of the 1902 Act, the word building, in section 2, was to be given its ordinary, natural and relatively wide meaning, so as to include a structure which was relatively permanent and substantial and could properly be described as "constructed"; that a substantial and effectively permanent structure like those in which Hindu cremations were carried out abroad, of which evidence had been given, could therefore be a crematorium within the definition in s. 2.

10. It is worth setting out the reasoning and analysis of Neuberger LJ who, in giving, the leading judgment of the Court of Appeal, considered the meaning of the word "building", and the appropriate way to approach its construction, in some detail. He said, at paragraphs 22 to 26 of his judgment:-

"The first argument is based on the normal meaning of the word "building". The meaning of the word "building", or, to put the point another way, determining whether a particular structure is a "building", must depend on the context in which the word is used. Interpreting a word in a statute or a contract, or indeed in any other document, can, of course, only be sensibly done by considering the context in which it is being used. However, where, as is the case here, the word is one which is used in ordinary language and has no established special legal or technical meaning, and is not defined in the document in

question (in this case, the Act), one can usefully take as a starting point the word's ordinary meaning. In the *Moir* case [1892] 1 QB 264,⁷ 270, 271, and 273, Lord Esher MR, Fry and Lopes LJ approached the question of the interpretation of the word "building" in the Metropolitan Building Act 1855 (18 & 19 Vict c 122) by starting with its "ordinary" meaning, its meaning in its "ordinary sense" and "popular usage", or its "ordinary and usual sense", and then considering its context.

In my view, Lord Esher MR's obiter statement in the *Moir* case, at p. 270, that the "ordinary" meaning of the noun "building" is "an inclosure of brick or stonework, covered in by a roof" can only be justified if it was intended to refer to the ordinary meaning of the word "building" in the context of the statute in which it fell to be construed in the case before him. It is not without significance that there is nothing in the reasoned judgments of Fry or Lopes LJ in the *Moir* case to support Lord Esher MR's statement.

Particularly as it appears that Lord Esher MR's statement as to the "ordinary" meaning of the word "building" may be treated as some sort of authoritative guidance as to the normal meaning of the word, I take this opportunity to say that it would be wrong to see it as having any such effect. In my opinion, the word "building" in normal parlance is naturally used to describe a significantly wider range of structures than would be included within Lord Esher MR's "inclosure of brick or stonework, covered in by a roof".

There are many wooden or other structures not made of "brick or stonework", such as chalets, stables, or industrial sheds, and there are many structures which are not "inclosures", such as wood-drying stores, bandstands, or Dutch barns, all of which, on the basis of the normal use of the word, are "buildings". Other structures come easily to mind, such as the pyramids or the colosseum, which are buildings in normal parlance, but do not fall within Lord Esher MR's "ordinary" meaning. So, too, at least some prefabricated structures, particularly if attached to a concrete, or similar, base, are naturally described as buildings.

Deciding what a word means in a particular context can often be an iterative process, and the ultimate decision should not be affected by whether one starts with a *prima facie* assumption as to the meaning of the word and then looks at the context, or one starts by looking at the context and then turns to the word. However, if one approaches the issue by making a preliminary assumption as to the meaning of a word such as "building", then, in agreement with what Etherton LJ said in argument, I do not think that it would be right to take a somewhat artificially narrow meaning of the word, and then see whether the context justifies a more expansive meaning. It is more appropriate to take its more natural, wider, meaning and then consider whether, and if so to what extent, that meaning is cut down by the context in which the word is used."

Neuberger LJ concluded at paragraphs 35 to 38:-

⁷ *Moir-v-Williams* [1892] 1 QB 264 at 270.

"In the light of these factors, I consider that there is no reason not to give the word "building" its natural and relatively wide meaning in section 2 of the Act, as discussed in paras 21–26 above. The fact that the noun which one might primarily use, in ordinary conversation, to describe some of the structures mentioned in para 25 above would not be a "building" is nothing to the point. The primary way most people would describe the structure in which they live would be a house or a block of flats, but that does not mean that a house or a block of flats is not, in ordinary language, a building.

There have, predictably, been many cases which have required the courts to consider the meaning of the noun "building", but the outcome has inevitably been governed by the context. None the less, it is not without interest to note that in this court a reasonably substantial barbecue has been held to be a "building" in the context of a restrictive covenant: see *Windsor Hotel (Newquay) Ltd-v-Allan The Times*, 1 July 1980; [1980] CA Transcript No 620. It is also perhaps worth mentioning that the contention that the noun "building" in section 10 of the Open Spaces Act 1906 should be restricted in the way that Mr Swift suggests was rejected in *In re St Luke's, Chelsea* [1976] Fam 295, 312d.

Accordingly, the wording of the Act does not detract from adopting the natural and relatively broad meaning of "building" in section 2. The references to crematoria being "constructed" in sections 5 and 6, and the reference to a donation of land in section 6, tend to suggest that to be a "building" within section 2 a structure must be (at the risk of an oxymoron) relatively permanent and substantial. This may remove some structures from the ambit of the word as used in the Act, but I doubt those aspects take the matter any further: if a structure is not relatively permanent and cannot be described as "constructed", it would not, I think, ordinarily be described as a "building".

This conclusion is supported by other factors. Thus, in the light of the wide regulatory powers given to the Secretary of State by section 7, there is no need to give a restricted meaning to the word "building" in the Act: if it was considered that, for one reason or another, the type of structure in which cremations could occur should be restricted, that could be achieved by regulations made pursuant to section 7. Further, where Parliament wanted to impose restrictions on crematoria (as it did in sections 2 and 5, with regard to fitting out and location), it spelt them out. Additionally, given that cremating bodies was known to be lawful as at 1902, it appears to me that one should lean in favour of a construction which gives a statute, introduced primarily to regularise, and ensure uniformity in, cremations, a generous rather than a restricted effect. (Quite apart from this, if, as I prefer to leave open, the Act does not preclude open air cremations, there would be a further reason for adopting a natural and wide definition of "building" for present purposes.)"

11. Although the word “building” is naturally used to describe a wide range of structures, as Lord Halsbury LC said in *Paddington Corporation-v-Attorney General* [1906] AC 1 at p. 3:-

“ ... in the books there may be found a great variety of cases where, with reference to the subject-matter of the covenant and the meaning of what was in question between the parties, a screen or some erection of that nature might be considered a “building” with reference to some covenants and might not be considered a building with reference to others. The subject-matter to be dealt with is to be looked at in order to see what the word “building” means in relation to that particular subject-matter. It is impossible to give any definite meaning to it in the loose language which is used in some cases; anything which is in the nature of a building might be within one covenant and the same erection might not be a building with reference to another covenant.”

12. The meaning of the word “building” has also been discussed at length in the context of the Disused Burial Grounds Act 1884⁸ but perhaps one of the more interesting cases is the Court of Appeal authority of *Long Eaton Recreation Grounds Co Ltd-v-Midland Railway Co* [1902] 2 KB 574. In that case a railway company took, for the purpose of their undertaking (i.e. the construction of the railway), land which was subject to a covenant, entered into by their vendor, not to erect thereon “any building other than private dwelling-houses.”⁹ The company constructed a railway embankment on the land. It was held that the erection of the embankment was a breach of the covenant. This may seem surprising. Collins MR held:-¹⁰

⁸ Section 3 of which provides: “... it shall not be lawful to erect any buildings upon any disused burial ground, except for the purpose of enlarging a church, chapel, meeting house, or other places of worship.” See in particular *Re St Luke's, Chelsea* (No. 1) [1976] Fam 295 and *Paddington Corporation-v-Attorney General* [1906] AC 1. In the latter case, Buckley J, with whom the House of Lords agreed, held: “I am of opinion that [s. 3 of 1884 Act] meant what it said - that the space was to remain unbuilt upon. It is to be disused as a burial ground, but it is not to be used as a building ground - that is the meaning of it; and it appears to me that anything that approaches to the character of a building, whether temporary or permanent, is obviously within the prohibition.”

⁹ The precise wording that the purchasers “will not erect any building on the said piece of land hereinbefore secondly described other than private dwelling-houses with proper conveniences, and all such houses shall front to Springfield Avenue aforesaid.”

¹⁰ At pp. 580-581.

"[I]n this case it seems to me to be obvious that these provisions as to the particular class of building which alone was to be allowed on the land were for the benefit of the land retained. The covenant was intended to secure that nothing but private dwelling-houses of a certain value should face Springfield Avenue; and to place an embankment there instead of private houses is certainly a breach of what was intended to be provided for by the covenant. It is said that there has been no breach because an embankment is not a building, but what is provided for is that if any building is to be erected on the land it is to be a private house, and that would, in my judgment exclude, and was intended to exclude, anything in the nature of an embankment. In substance the covenant is that nothing but a private dwelling shall be erected on the land. If, however, it is necessary to say whether a railway embankment can be covered by the word "building," I see no reason for saying that it cannot. A building is not necessarily limited to a structure of bricks and mortar. There is nothing to negative this view, and it seems to me to be obvious that it comes within the sense of the covenant, and that to hold otherwise would be to defeat the object of the parties."

13. I turn now to the verb "to erect" which has been used in the covenant affecting Jeffreys Farm. The noun "erection", like the word construction, has a wider meaning than building, although it is considered¹¹ that it probably has to be above a surface. This is consistent with the origin of the verb "to erect" which comes from the Latin, *erigere*, to raise. The Shorter Oxford English Dictionary gives the following meanings for the verb to erect:-

I – elevate, raise

1. set in an upright position, make erect
2. direct upwards
3. raise in importance, dignity

II – construct, establish

1. build, construct, set up (a statue, a pole etc)
2. raise an army
3. draw a line perpendicular to a given line.

¹¹ See Preston & Newsom on *Restrictive Covenants Affecting Freehold Land* (10th edn.) at para. 7.02.

14. Having regard to the above authorities and principles of construction, it therefore seems to me that in the present case the normal, everyday meaning of the word “building” or the words “building of any type” would not ordinarily include a road within its definition. My view that, in this particular covenant, the definition “building” was not obviously intended to include “road” is reinforced by the use of the verb “to erect”. Whilst one readily refers to “building” or “constructing” a road, it would be most unusual to use the phrase “to erect a road” unless the road was of an obviously elevated type.¹² The use of the verb “to erect” in these types of restrictive covenants conveys the sense of a construction that rises above the ground, unlike the intended access road, in a way that is more than merely *de minimis*. I have found no case where a road has been held to be either a building or an erection, or even contemplated as such. I pause to observe, however, that if the intended access road were to be of a noticeably elevated type, then I consider that such a road, with the substantial infrastructure that it would possess, could well fall within the definition of “a building or any type of building” as those words appear in the Transfer.
15. Poles for the purpose of carrying electricity cables can be erections or structures, but strong judicial doubt has been expressed as to whether they could be buildings.¹³ This is relevant to the concern expressed in my instructions about street lighting, although I note that street lighting is not planned at the present time.

¹² Such as a flyover. It would not be odd, it seems to me, to refer to “erecting a flyover”.

¹³ See *National Trust-v-Midland Electricity Board* [1952] Ch 380 *per* Vaisey J at p. 384: “The first and fundamental point to be considered is the meaning and effect of the restrictive conditions. Let me deal first with the second, which reads as follows: “No building shall at any time hereafter be erected upon any part of the land by or with the consent of the covenantors,” a word which now, in the events which have happened, means the Church Commissioners. In my judgment, these poles are certainly not buildings, though they may well be erections or structures, and for that proposition I rely on *Wood-v-Cooper* [1894] 3 Ch 671 and *Paddington Corporation-v-Attorney-General*. [1903] 1 Ch 109.

16. Turning to the broad intention of the restrictive covenant, it seems to me that, in the light of that intention, the words “building or any type of building”¹⁴ are not reasonably capable of encompassing an access road of the type intended at Jeffreys Farm. The broad purpose of the covenant, so it seems to me, is to preserve the open space and rural character of the land edged yellow retained by George Griffiths (albeit that a sports pavilion is permitted), for the benefit of the neighbouring land at Jeffreys Farmhouse (in respect of which similar restrictions are imposed by the Transfer) and that it is for that reason that the erection of buildings is prohibited by the covenant.¹⁵ That being the broad purpose of the covenant, it therefore seems to me that there is no justification for construing an access road of the type intended as a “building” within the meaning of the covenant.¹⁶

17. That is probably all I can usefully say for the time being.


KATE SELWAY

9th September 2016

¹⁴ It seems to me that if the words “any type of building” add anything to the definition it is simply that they emphasise its intended width.

¹⁵ See the Fourth Schedule to the Transfer.

¹⁶ It would clearly not, in my view, be open to argue that the construction of the road breaches the covenant affecting the land edged yellow because the road provides access to a housing development (“buildings”) on neighbouring land. The buildings to which the access road is intended to lead would not be on the land burdened by the covenant. This may seem obvious but a similar point was in issue in the Court of Appeal case of *Coventry School Foundation Trustees-v-Whitehouse* [2013] EWCA Civ 885; [2014] 1 P&CR 4 where the matter was clarified. In that case the covenant prohibited the burdened land being used for purposes causing nuisance annoyance and disturbance. The operation of a school was proposed on the burdened land. The apprehended nuisance etc was the increased traffic twice daily on the school run; but this traffic nuisance would take place on adjacent highways, not on the burdened land itself. The court held there would be no breach of covenant.

Radcliffe Chambers,
11 New Square,
Lincoln's Inn,
London,
WC2A 3QB.

September 2016

RE: LAND AT JEFFREYS FARM, HORSTED

KEYNES, WEST SUSSEX

OPINION

WAUGH & CO SOLICITORS
3 HEATH SQUARE
BOLTRO ROAD
HAYWARDS HEATH
WEST SUSSEX
RH16 1BD

REF: JSC/GRI30/2/Griffiths

September 2019

Challenge to AONB assessment of site #69, Land at Jeffreys Farm (Fields to North of Farm Buildings), Horsted Keynes of May 2019.

Prepared by H. Griffiths

We understand that the High Weald Area of Outstanding Natural Beauty (AONB) Partnership fulfil an advisory role to both Local Authorities and Neighbourhood Plans steering groups. The advice provided by the AONB Partnership is being heavily weighted in planning decisions, and therefore needs to be robust and defensible.

We have serious concerns over the advice being provided in respect of both planning decisions, local plan formulation and Neighbourhood Plan preparation in Horsted Keynes by the AONB planning department. There appears to be a failing in impartiality, transparency, and consistency of the assessment of sites in connection with the Mid Sussex District Council (MSDC) SHELAA assessments, and also the Horsted Keynes Neighbourhood Plan site assessments. This seems to be most notable for site #69 (Land at Jeffreys Farm, Field to north of farm buildings). We are raising these concerns to you as the landowners of site #69, however there have been comments made to us by several members of the public concerning the assessment of site #69, so we feel we are also representing the interests of the community as a Neighbourhood Plan is being prepared, and site #69 has support from many residents of the parish.

History of the AONB Assessments:

Site #69 has been assessed twice by the AONB: firstly, in October 2018 as part of an amalgamated assessment of the farm area (SHELAA site #780), and again in May 2019 as a stand-alone site #69.

The initial October 2019 assessment was on a site (#780) that was not being promoted by the landowners as a large block of 5.32 ha. MSDC had amalgamated the 3 different sites put forward, which included a large area being promoted as green space (with a restrictive covenant on it preventing building, but NOT access), and also a woodland area. MSDC used the whole area to calculate a housing unit number of 80 units. This was not a number that the landowners envisaged or were comfortable promoting. Understandably the AONB Partnership assessed this amalgamated area as high impact, as it affected a medieval field system in the south, and also was a large development which would have been out of character with the historic growth of the village. See Appendix 1 for the AONB assessment.

In December 2018 / January 2019 the landowner contacted MSDC and asked them to subdivide the amalgamated area (#780) into the different sites that they had originally promoted within the

SHELAA call for land, and to change the number of units associated with the site, to reflect their aspirations. The subdivision also included the removal of the woodland area and the covenanted green space, as these areas were not available for development, thus substantially reducing the area being promoted. Two new site numbers were generated: #69 (field to the north) being 2.23ha for 22 units, and #971 (field to the south) being 0.86 ha for 12 units. The density aspirations for the sites were guided by pre-application advice for a development on the farm buildings (#68) where the MSDC planner had indicated she wanted to see large detached dwellings in character with the surrounding residential development (for example as per Lewes Road, Sugar Lane and Boxes Lane). The assessment of these two sites by the AONB Partnership in May 2019 was confirmed then to be of high impact (See Appendix 1).

It is unclear which of these assessments was a 'desktop assessment', and which have involved site visits. The landowners met the AONB Planning officer, together with the Parish Council planning consultant on site by coincidence earlier this year (2019). This was by coincidence, as there had been no communication to say that they were visiting the sites. We can only assume that earlier assessments were only desktop exercises.

Our Concerns:

1. Recent AONB re-assessment of site #69 - May 2019

The new assessment of site #69 does not seem to reflect the reduction in area being promoted, the reduced number of housing units being proposed, nor the fact that this site is now only occupying a modern field system, as per the AONB Partnerships own assessment of field system ages in 2017.

- The site area has reduced from 5.32ha (#780) to 2.23ha (#69)
- The reduction in housing proposed for the site has reduced from 80 units (#780) to 22 units (#69)
- The reduced site (#69) no longer incorporates the medieval fields to the south (new site #971) and occupies modern field systems only. Appendix 3 includes the map of field system ages, taken from the AONB Partnerships assessments of SHELAA sites in October 2018.

The conclusion of high impact for site #69 in May 2019 does not seem to take account or indeed represent the site and the new information that has come forward since the first assessment.

AONB assessments should consider the impact on the AONB in conjunction with the plans of the developer as this is how mitigation can be discussed and a positive outcome for both parties can be achieved.

2. Terminology used to describe site #69 is not objective.

The description of site #69, specifically under the AONB characterisation category of 'Settlement' is incorrect and misleading. Terminology used forms a negative image of the site, and is not objective.

The description reads: ***‘Jeffreys Farm is a historic farmstead separated from the village by Sugar Lane. The western side of the lane is characterised by dispersed settlement, and development of this site would be uncharacteristic of this area’.***

- The use of the term ‘separated’ from the village, suggests that the area is disconnected from the settlement boundary. This is not the case. The site is adjacent to the built-up area boundary of Horsted Keynes. The fact that this boundary is along a road does not mean it is disconnected from the settlement. The mature woodland to the east of the site forms a substantial screen to existing housing, and would reduce the impact of development for existing residents, two listed buildings (Boxes Farm and Ludwell), and the AONB as a whole, and this screening is noted positively in the description of the site under ‘Public understanding and enjoyment’. See Appendix 4 for the built-up area boundary map.
- The description of Sugar Lane as having ‘dispersed settlement’ along its western side is also misleading. Sugar Lane is a Lane by name, but leads directly in to a section of Lewes Road and Treemans Road, to the south (all sections of the existing highway network). The settlement along the western boundary of this continuation is not dispersed, but a continuous row of 11 predominantly detached houses with large gardens. See Appendix 5 for the detailed map of Sugar Lane and Lewes Road / Treemans Road to the south.
- The description is quick to characterise the western side of Sugar Lane, but omits to describe the eastern side of the lane. The eastern side is a continuous stretch of housing from Station Road in the north, to Lewes Road in the south, running parallel to site #69, again being predominantly detached houses. Sugar Lane is not the rural lane that many might envisage when reading the description, but is a heavily urbanised edge of the village. See Appendix 5 for the detailed map of Sugar Lane and Lewes Road / Treemans Road to the south.
- The comment that suggests that ‘development of this site would be uncharacteristic of this area’, seems to contradict what is clearly shown on maps. The area is already urbanised, with large detached dwellings.

3. Uncertainly over the age of the farmstead at Jeffreys Farm

The site assessment for site#69 notes ***‘the probable age of Jeffreys Farm House’***. This is speculation.

Horsted Keynes is a historic village, and it has been serviced by small farmsteads that have gradually been over-run by development. Most notably Rixons Farm (on the Green), and Boxes Farm (on Sugar Lane). These are both listed buildings and are predominantly of a timber construction, clearly medieval in nature.

Jeffreys Farm House is not of a similar construction, being predominantly brick, showing characteristics of Georgian architecture. Within the farmhouse there is an old beam on the internal western wall, but as far as we know there is no date attributed to this construction. A Sussex barn (now dilapidated) has stood on the farm site and is noted on the Tythe map 1842.

None of this definitively points towards the farm, or farmhouse being medieval.

4. Conclusion comments for site #69 show little knowledge or understanding of how Horsted Keynes has developed since the Second World War

The Conclusion states: '**development would be out of character with the settlement pattern of Horsted Keynes**'.

These concluding comments are ill-informed, and show no understanding of how the village has developed over the last 75 years.

Pre-war, houses were built sporadically, in isolation, and in a scattered pattern across the bounds of the village as we know it today. However, Post-war, the village has grown substantially, and development has occurred as clusters of multiple houses, predominantly in cul-de-sacs, both infilling within the village historic routeways, but also on the edges of the village, jumping the routeways in to open countryside. The developments ranged in number from 6 houses (Rixons Orchard in the 1960's) to tens of houses (Challoners in the 1970's and 1980's). A list of the housing developments with approximate dates and number of housing units is shown below. Appendix 6 shows a map of the location of these housing clusters.

Post war cluster developments in Horsted Keynes:

- **Rixons** (cul-de-sac off Station Road) – 16 semi-detached houses, built pre 1947
- **Jefferies** (through road from Sugar Lane to Lewes Road) – 16 semi-detached houses, built ~1947
- **Boxes Lane** (cul-de-sac off Sugar Lane) – detached houses, 14 built ~1955
- **Lucas** (cul-de-sac off Birch Grove Road) – 12 detached houses, built ~1959
- **Hamsland** (cul-de-sac off Lewes Road) – 11 bungalows, and 10 semi-detached houses, built ~1956 to 1959
- **Rixons Orchard** (cul-de-sac off Station Road) – 6 detached and semi-detached bungalows, built pre 1973
- **Challoners** (extension of cul-de-sac off Lewes Road / Hamsland) – 60 semi-detached houses, built post 1974 to 1980's
- **Cheeleys** - (cul-de-sac off Church Lane) – 12 bungalows, and 8 detached houses, built post 1974
- **Hillcrest** (cul-de-sac off the Green) – 9 semi-detached houses, built ~2000
- Since 2000 only single or double infill dwellings have been built and as a result no more infill opportunities exist in the built-up area boundary of Horsted Keynes today.

The development of Horsted Keynes clearly shows that historically, larger developments have occurred and these have also occurred on the periphery of the village, jumping the old routeways in to open countryside sporadically as the need for housing grew. Whilst there is an understanding that the AONB Partnership seek to limit development, there is no space left within the built-up area boundary of Horsted Keynes for larger developments. In addition small piece-meal development and single dwellings provide no affordable housing for the village.

5. The AONB assessment of site #69 does not appear to be comparable with other site assessments in the village.

Several sites across the village have been assessed by the AONB Partnership as part of both the SCHELAA assessment for MSDC, and also for the Neighbourhood Plan of Horsted Keynes. When comparing the high impact conclusion reached in relation to site #69 with other sites that have a high impact rating, there are dramatic discrepancies in the characteristics which suggest that site #69 is not being assessed consistently. In addition, when comparing site #69 to sites with 'Low' and 'Moderate' impacts, again there seems little justification to rate site #69 as high.

The sites in question are listed below, and the full AONB assessments are also shown in Appendix 7:

- Farm Buildings, Jeffreys Farm #68 – 18 units (0.7ha) – **LOW impact**
- Land at Jeffreys Farm #780 – 80 units (NUMBER AND AREA NOT AS PER LANDOWNER PROMOTION) (5.32 ha) – **HIGH impact**
- Land at Jeffreys Farm (Fields to North of farm buildings) #69 – 22 units (AS PER LANDOWNER PROMOTION) (2.23ha) - **HIGH impact**
- Land at Jeffreys Farm (Fields to South of farm buildings) #971 – 12 units (AS PER LANDOWNER PROMOTION) (0.86ha) - **HIGH impact**
- Land west of Church Lane 'Sledging Field' #893 – 38 units (4.3ha) - **HIGH impact**
- Land at Police House Field #216 – 10 units (0.26ha) - **MODERATE impact**
- Land South of Police House Field #807 – 40 units (3.0ha) - **HIGH impact to MODERATE impact (with mitigation)**
- Land South of St Stephens Church #184 – 30 units (1.2ha) – **LOW impact**

Again, I reiterate that it is unclear which of these assessments have been made on the basis of desktop analysis and which sites have actually been visited in person. We understand that the Parish Council planning consultant has been on some sites with the AONB planning officer at some point in 2019, but it is unclear which sites and when.

For ease I will break down the concerns that I have about the way in which site #69 has been assessed in comparison with other sites in the village in to 3 sections: (A) comparing with site #893 in Church Lane; (B) comparing with site # 184 St Stephens Field; and finally (C) comparing to site # 216 and #807 at Police House Field.

A. Comparing site #69 with site #893 in Church Lane

Both sites have been deemed high impact by the AONB Partnership, but when comparing the proximity to the Conservation Area of Horsted Keynes, the topography and hence the potential to mitigate any visual impacts of development, the existing screening, and the visibility from public footpaths, the sites are dramatically different.

Appendix 8 shows map located photographs of the sites to compare the impact.

Site #893:

- Site #893 is directly adjacent to the Conservation Area and in clear sight of a Grade I listed building (St Giles Church) – refer to photo 7 in Appendix 8, and map of Conservation Area in Appendix 8.

- Site #893 has a public footpath running along its northern boundary, with no existing screening meaning the site is highly visible – refer to photos 9, 10 and 11 in Appendix 8.
- Site #893 has no existing screening on its northern, eastern or western boundaries – refer to photos 6-11 in Appendix 8.
- Site #893 has 25m of elevation gain across the site, meaning any mitigation planting will be ineffective – refer to map of site #893 in Appendix 8.
- Site #893 is assessed as a modern field system by the AONB. See Appendix 3 for the map of field system ages, taken from the AONB assessments of SHELAA sites in October 2018.

Site #69:

- Site #69 is some distance from the Conservation Area across the village and is well screened from 2 listed buildings (Ludwell and Boxes Farm) - refer to photos 1 and 2 in Appendix 8.
- Site #69 has no public footpaths in the vicinity – refer to map of site #69 in Appendix 8.
- Site #69 is surrounded by tall mature hedge-lines on all boundaries - refer to photos 1-5 in Appendix 8.
- Site #69 has 10m of elevation gain across the site, enabling any mitigation planting to be effective, if needed – refer to map of site #69 in Appendix 8.
- Site #69 is assessed as a modern field system by the AONB. See Appendix 3 for the map of field system ages, taken from the AONB assessments of SHELAA sites in October 2018

We believe that site #69 is NOT directly comparable to site #893, and cannot be considered to be a high impact site in the AONB.

B. Comparing site #69 with site # 184 St Stephens Field

Site #69 has been deemed high impact by the AONB Partnership, yet site #184 is deemed low impact. When comparing the sites visual impact and the existing screening, the sites are quite similar. Yet site #184 requires the removal of mature trees for access, and has little screening to the northern boundary.

Appendix 9 shows map located photographs of the sites to compare the impact.

Site #184:

- Site #184 has existing mature screening on the majority of its eastern, southern and western boundaries, with only minimal distant views – refer to photos 12 to 15 in Appendix 9.
- Site #184 has no existing screening on the northern boundary, so would have a high visual impact on the properties to the north and also from the public footpath that runs along Hamsland and Challoners – refer to photos 12, 15 and 16 in Appendix 9.
- Access to site #184 is of limited width (7m), and bounded by mature trees to the west. The developer has said that these trees will need to be removed as

root systems will be severely damaged by the access road. This in itself removes a distinct tree belt, and also a large portion of the existing screening to the site from the west – refer to photos 15 and 16 in Appendix 9.

- Site # 184 concluding remarks do not make comment on the development of the site for 30 units and the impact on the settlement pattern.
- Site #184 is assessed as a medieval field system by the AONB. See Appendix 3 for the map of field system ages, taken from the AONB assessments of SHELAA sites in October 2018

Site #69:

- Site #69 is surrounded by tall mature hedge-lines on all boundaries - refer to photos 1-5 in Appendix 8.
- Site #69 has no public footpaths in the vicinity – refer to map of site #69 in Appendix 8.
- Access to site #69 will not involve the removal of any mature trees, on the southern boundary (refer to photo 3 in Appendix 8), nor on the access point on Sugar Lane opposite Jefferies (refer to photo 5a in Appendix 8). This access has been proposed in 2 previous planning applications, and in neither application was there objection to the access by WSCC Highways.
- Site #69 concluding remarks from the assessment say that a development of 22 units is out of character with the settlement pattern.
- Site #69 is assessed as a modern field system by the AONB. See Appendix 3 for the map of field system ages, taken from the AONB assessments of SHELAA sites in October 2018

We believe that site #69 is comparable to site #184, or potentially has even less impact as is a modern field system and no mature trees are being removed to gain access to the site. It should be considered low impact on the AONB, in line with the assessment of site #184.

What is of more concern is that the AONB Partnership consider a development of 22 houses on site #69 to be out of character with the settlement pattern, yet a development of 30 houses on site #184, also outside the built-up area boundary for Horsted Keynes, is not considered out of character, nor even mentioned. Why is the scale of the development not an issue for site #184, yet is a defining conclusion for site #69?

C. Comparing site #69 to site # 216 and #807 at Police House Field

Site #69 has been deemed high impact by the AONB Partnership, yet site #216 is deemed low impact and site #807 high impact. Site #216 is just the strip of Police House field along the Birch Grove Road to the junction with Danehill Lane. Site #807, is the extension of the field behind the Police House, and a second field to the south, with a mature hedge-line separating the two.

When comparing the sites with site #69 in relation to the boundary screening to the east, south and west, the sites are quite similar. Yet site #216 requires the likely removal of a distinct mature tree for access, has a mature hedge-line running across the site which could be threatened, has a footpath running across the site, and has little screening to the northern boundary. Appendix 10 shows map located photographs of the sites to compare the impact.

Site #216/807:

- Site #216 is clearly visible from Birch Grove Road and if developed will be the first glimpse of housing as you enter the village from the east - refer to photo 23 in Appendix 10.
- Site #216 is directly opposite and in clear line of sight to a listed building, Lucas Farm - refer to photo 23 in Appendix 10.
- Site #216 has no existing boundary on the southern side and is open field (site #807), and the northern boundary is an overgrown hedge that the majority of will need to be removed to create access - refer to photos 18 and 20 in Appendix 10.
- Access to site #216 will most likely need the removal of a distinct mature oak in the roadside verge to enable visibility splays - refer to photo 23 in Appendix 10.
- Site #807 has a footpath crossing the site, so visual impact along that open field footpath will be high - refer to photos 19 and 22 in Appendix 10.
- Site #807 is clearly visible from Danehill Lane, as you enter the village from the east - refer to photo 23 in Appendix 10.
- Site #807 has predominantly mature screening on its eastern, southern and western boundaries - refer to photos 17, 21 and 22 in Appendix 10.
- Site #807 has little mature screening along its northern boundary adjoining the residential houses.
- Site #807 is directly adjacent to the Conservation Area along a small section of its western boundary - refer to photo 21 in Appendix 10, and the Conservation Area map in Appendix 8.
- Site #807 has a mature hedge-line running across the site, which could be under threat from development - refer to photo 19 in Appendix 10.
- Site #807 is assessed as a medieval field system by the AONB. See Appendix 3 for the map of field system ages, taken from the AONB assessments of SHELAA sites in October 2018.

Site #69:

- Site #69 is surrounded by tall mature hedge-lines on all boundaries - refer to photos 1-5 in Appendix 8.
- Site #69 has no public footpaths in the vicinity – refer to map of site #69 in Appendix 8.
- Site #69 is not close to the Conservation Area, but is well screened from 2 listed buildings (Ludwell and Boxes Farm) - refer to photos 1 and 2 in Appendix 8.
- Site #69 has no hedge-lines running across the site at risk from development.

- Access to site #69 will not involve the removal of any mature trees, on the southern boundary (refer to photo 3 in Appendix 8), nor on the access point on Sugar Lane opposite Jefferies (refer to photo 5a in Appendix 8). This access has been proposed in 2 previous planning applications, and in neither application was there objection to the access by WSCC Highways.
- Site #69 is assessed as a modern field system by the AONB. See Appendix 3 for the map of field system ages, taken from the AONB assessments of SHELAA sites in October 2018

The comparison of these sites and their assessments is again confusing and seems to be in contradiction regarding field system ages, visibility from routeways and footpaths. How is a development of 40 houses on a site that is visible at the entrance to the village, comparable to a site that is well screened and only for 22 houses?

6. The AONB assessment of sites seems to be a simple and basic qualitative process, rather than a quantitative process and as a result is open to wildly different interpretation by different assessors.

The current AONB assessments appear to use a solely descriptive element, which as we have shown, is open to substantially different interpretation. There is no apparent assessment matrix, or methodology statement attached to the determination of impact. If this does exist in the background this information should be made publicly available, as the process to assess sites should be transparent and the methodology for decision making made clear.

If an assessment matrix or defined methodology does not exist (as it appears not to) there should at the very least be a more robust and reproducible assessment for each element that is being assessed, such as a simple traffic light system, as MSDC do with the SHELAA assessments.

Assessment made by the AONB Partnership are being used by Local Authorities and Parish Councils to rank sites, and although the AONB Partnership describe their assessments as 'advice' it is being used as evidence to influence decisions being made, and is being weighted heavily. The inconsistency and lack of identifiable methodology for assessments calls in to question their validity. This opens up the AONB Partnership to unnecessary scrutiny, that could be avoided by a more pragmatic approach that is auditable. Sometimes employing a simplistic approach is appropriate, but in this case a more robust assessment is required given the gravity and weight being applied in decision making.

Conclusion:

We would like to challenge the assessment that the AONB Partnership have given to both the Horsted Keynes Parish Council in relation to their Neighbourhood Plan, and also Mid Sussex District Council with regards to their local plan formulation and SHELAA site assessments, for the site described as #69 Jeffreys Farm fields to north.

The AONB Partnerships assessment of site #69 does not appear to be a robust or consistent assessment, when compared to how other sites in the village of Horsted Keynes have been considered. The lack of identifiable methodology of the assessment leaves it open to interpretation and ultimately criticism. Sites in close proximity are not compared comprehensively with site #69, and as a result we believe that a full reassessment of all Horsted Keynes sites with a comprehensive and clear methodology should be undertaken. This should also be applied to all AONB assessments provided to MSDC and other parishes preparing Neighbourhood Plans.

We understand that the AONB Partnership have limited resources, but their advice is being used as evidence to justify planning decisions and it should be able to be scrutinised objectively.

There have been a number of concerns raised about the high impact conclusion for site #69 not just by local residents but also by planning professionals not associated with our own applications. As landowners we are challenging this assessment on behalf of the community as the site #69 on Jeffreys farm has local support, yet is being excluded from development solely due to the AONB impact assessment.

Appendix 1 – AONB assessments of Jeffreys Farm sites in Horsted Keynes

Farm Buildings, Jeffreys Farm #68 – 18 units (0.7ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites Oct 2018 – **LOW**

IMPACT

SHELAA Reference 68	Farm buildings, Jeffreys Farm, Horsted Keynes	18 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Reasonably flat farmyard of mainly modern buildings. No watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Originally farm buildings for historic farmstead Jeffreys Farm. Separated from main village by farmland and Sugar Lane. Design of development would need to reflect farmstead model rather than sub-urban layout.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Sugar Lane is a historic routeway.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	No woodland on or adjacent to site but mature trees on boundaries and within site.	
Field and heath <i>Field systems and meadows / heathland data</i>	Not classified as a field in the Historic Landscape Characterisation.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Secluded site with limited public views.	
Conclusion	Low impact on AONB provided the design of the development reflects a farmstead model.	

Land at Jeffreys Farm #780 – 80 units (NUMBER AND AREA NOT AS PER LANDOWNER PROMOTION) (5.32 ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites Oct 2018 – **HIGH**

IMPACT

SHELAA 780	Land at Jeffery's Farm, Sugar Lane, Horsted Keynes	80 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Undulating fields around and including farmyard (site 68). No watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Jeffreys Farm is a historic farmstead separated from the village by Sugar Lane. The western side of the lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area. The scale of development is significant for the size of the village.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Sugar Lane and Keysford Lane are historic routeways.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	There is an area of Ancient Woodland to the south-west of the site and mature trees on field boundaries and within the site. There is a dense screen of trees alongside Sugar Lane and at the junction with Keysford Lane which probably marks the original wider junction for driving stock.	
Field and heath <i>Field systems and meadows / heathland data</i>	Partly medieval and partly post-medieval field system, the latter due to more recent field amalgamations. Given the probable age of Jeffreys Farmhouse it is likely that the whole farmstead is medieval in origin.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Very limited views into the site from routeways due to mature hedgerows and trees.	
Conclusion	High impact on AONB due to loss of medieval fields and development out of scale and character with the settlement pattern of Horsted Keynes.	

Land at Jeffreys Farm #69 (fields to North) – 22 units (AS PER LANDOWNER PROMOTION) (2.23 ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites May 2019 – **HIGH IMPACT**

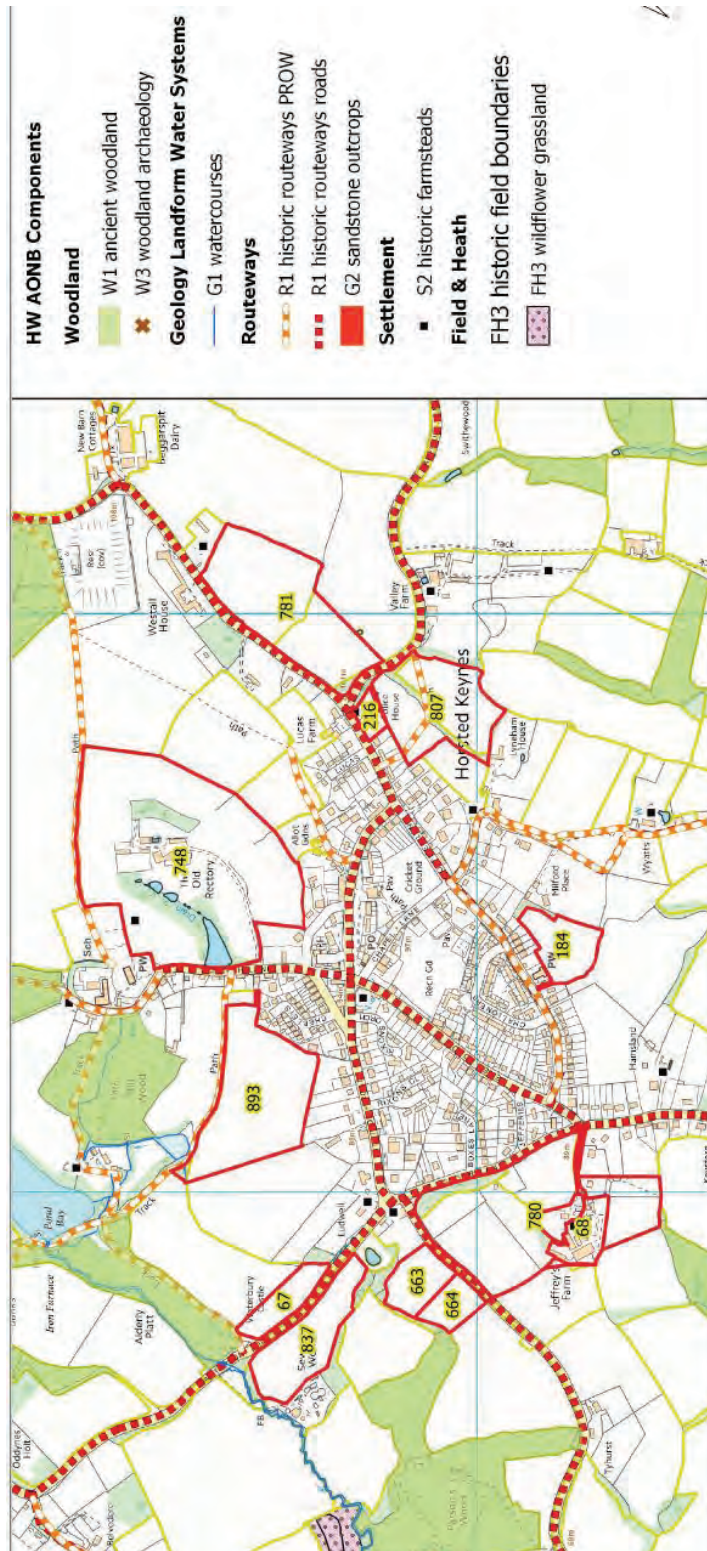
SHELAA Site 69 (part of site 780)	Land at Jeffery's Farm, Sugar Lane, Horsted Keynes (the northern field of site 780)	22 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Undulating field to the north of the farmyard site. No watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Jeffreys Farm is a historic farmstead separated from the village by Sugar Lane. The western side of the lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Sugar Lane and Keysford Lane are historic routeways.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	Mature trees on field boundaries and a dense screen of trees alongside Sugar Lane and at the junction with Keysford Lane which probably marks the original wider junction for driving stock.	
Field and heath <i>Field systems and meadows / heathland data</i>	Post-medieval field system due to more recent field amalgamations. Given the probable age of Jeffreys Farmhouse it is likely that the whole farmstead is medieval in origin.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Very limited views into the site from routeways due to mature hedgerows and trees.	
Conclusion	High impact on AONB as development would be out of character with the settlement pattern of Horsted Keynes.	

Land at Jeffreys Farm #971 (fields to South) – 12 units (AS PER LANDOWNER PROMOTION) (0.86 ha)

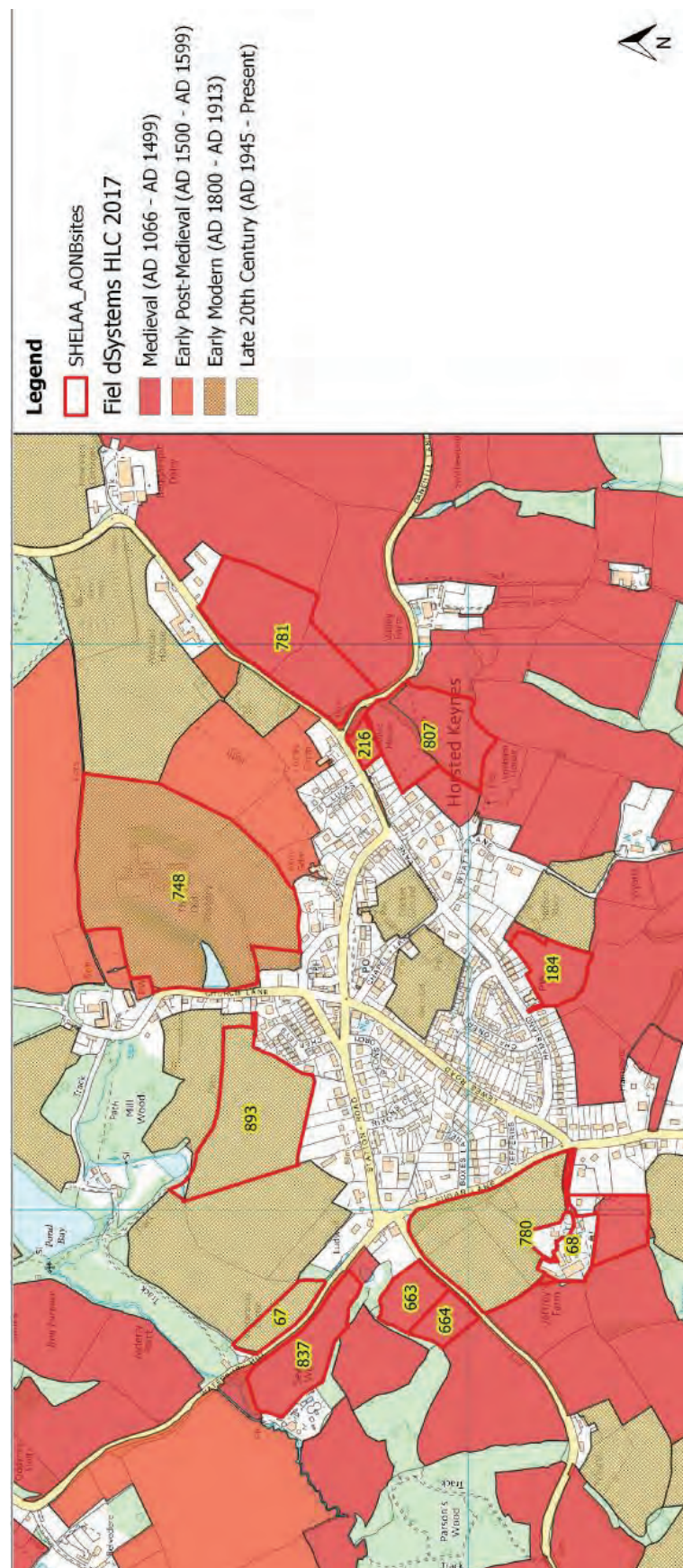
Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites May 2019 – **HIGH IMPACT**

SHELAA Site 971 (part of site 780)	Land at Jeffery's Farm, Sugar Lane, Horsted Keynes (the southern field of site 780, south of site 68)	12 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Undulating field to south of farmyard (site 68). No watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Jeffreys Farm is a historic farmstead separated from the village by Sugar Lane. Location of access unclear and this site is detached from any existing part of the settlement. The western side of Sugar Lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Sugar Lane and Keysford Lane are historic routeways.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	There is an area of Ancient Woodland to the south-west of the site and mature trees on field boundaries.	
Field and heath <i>Field systems and meadows / heathland data</i>	Part of a medieval field system. Given the probable age of Jeffreys Farmhouse it is likely that the whole farmstead is medieval in origin.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	No views into the site from public viewpoints due to mature hedgerows and trees and residential curtilages.	
Conclusion	High impact on AONB due to loss of medieval field and development out of character with the settlement pattern of Horsted Keynes.	

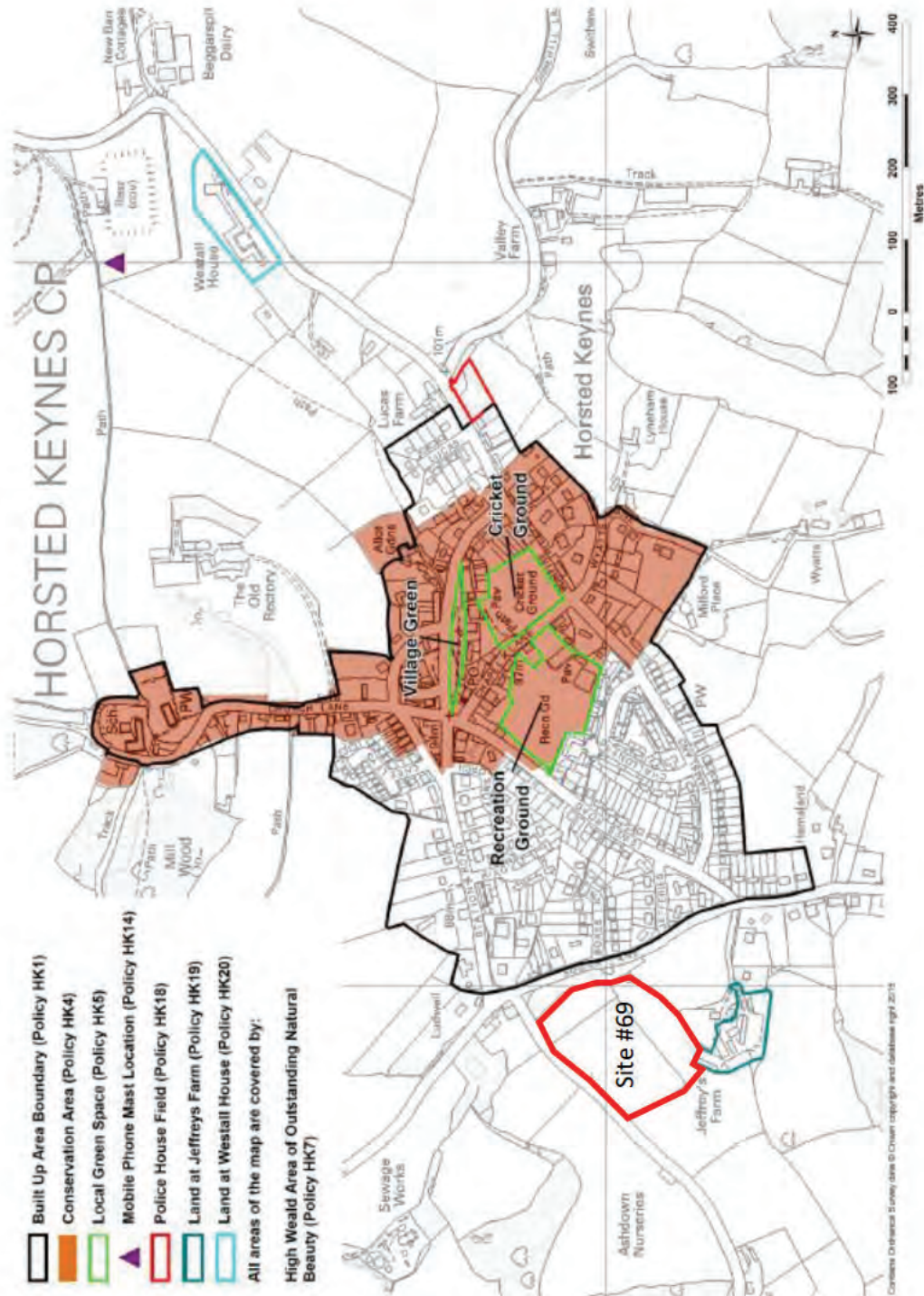
Note that Site #780 at Jeffreys farm was amalgamated by MSDC, and has since been re-subdivided in to 2 sites: site #69 (northern field) and site #971 (southern field) – eastern field withdrawn from SHELAA assessment.



Appendix 3 – Map of field system ages from AONB assessment dated 2017 – taken from the AONB report dated Oct 2018



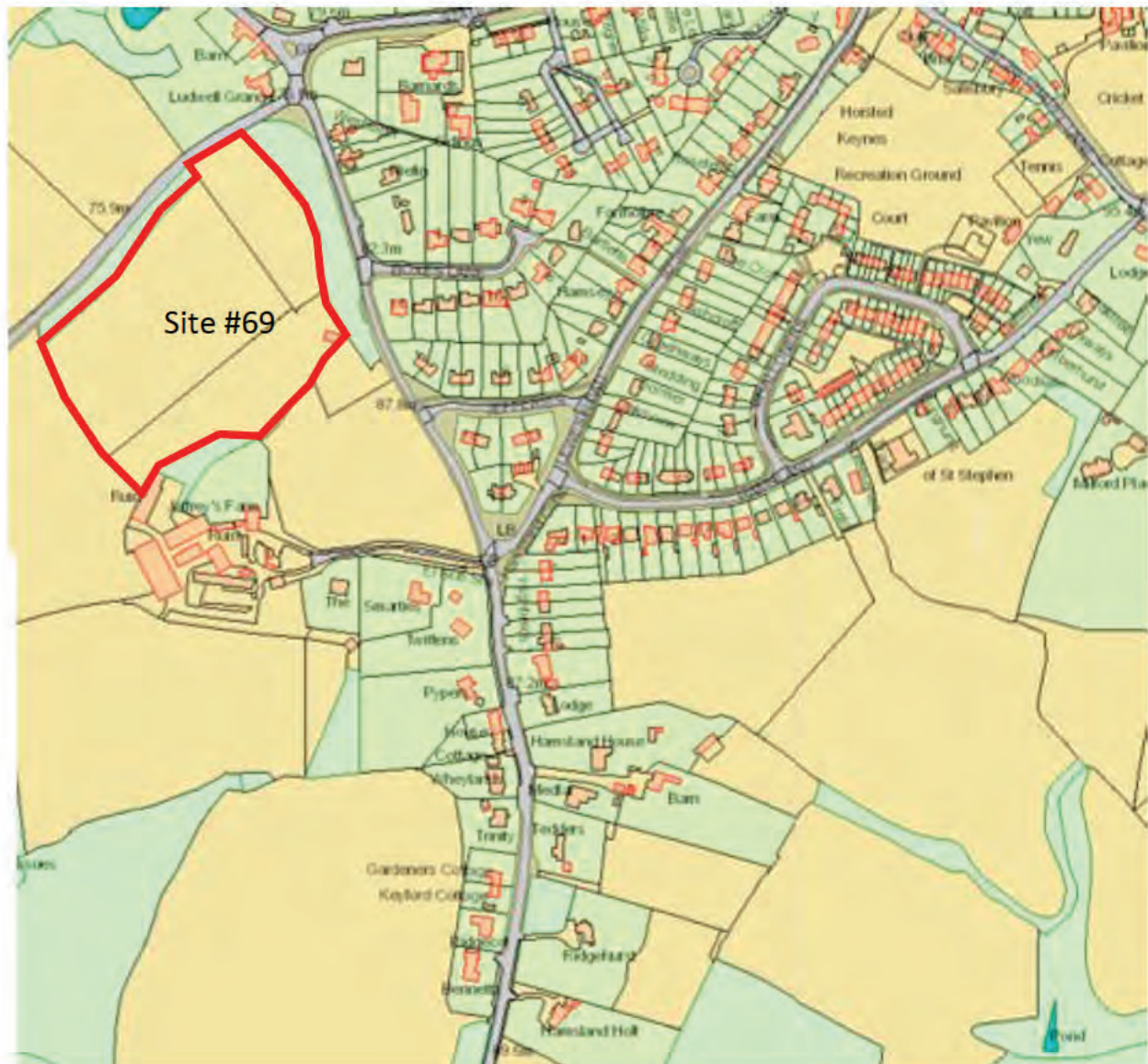
Appendix 4 – Map of Horsted Keynes Built up area Boundary – from the Horsted Keynes Neighbourhood Plan (submitted Nov 2017, withdrawn July 2018), with site #69 added in red outline



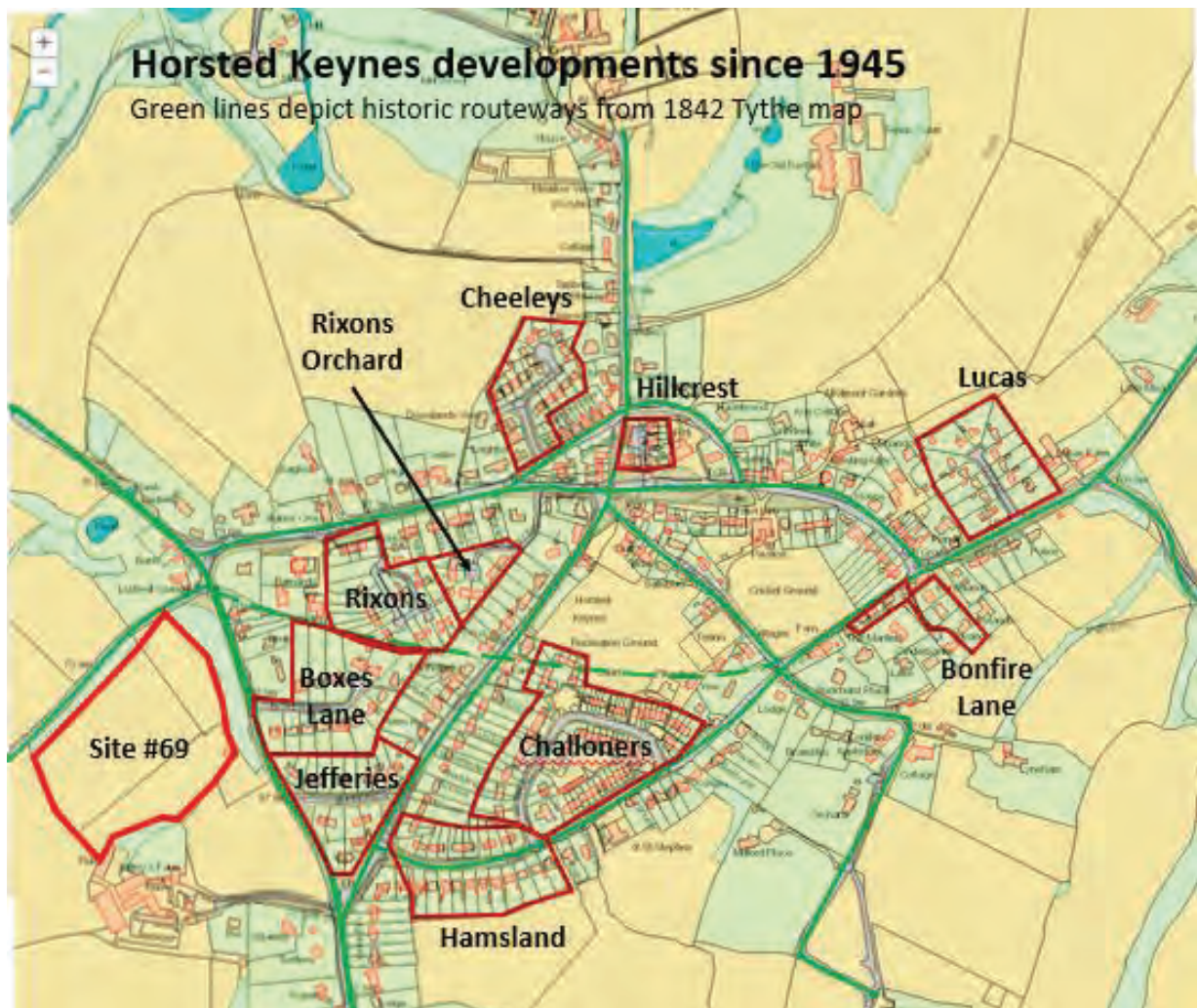
Appendix 5 – Detailed map of the western side of Horsted Keynes 2019 (from the MSDC planning website)

Note – lines in site #69 represent modern barbed wire stock fencing.

Note – green area to east of site #69 represents woodland with TPO's on, but this would not be threatened by any development on site #69 as the field to the south of site #69 is also in the landowners ownership, so access from site #69 would be from the south-eastern corner through that field on to Sugar Lane.



Appendix 6 – Map of Horsted Keynes showing the location of cluster development in the village since the war (base map from the MSDC planning website 2019, date information from OS maps and aerial photos as listed)



Maps / Aerial images used:

- Horsted Keynes Tythe Map 1842
- Horsted Keynes OS Maps 1874 (six inch to the mile)
- Horsted Keynes OS Maps 1896 (six inch to the mile)
- Horsted Keynes OS Maps 1909 (six inch to the mile)
- Horsted Keynes OS Maps 1938 (six inch to the mile)
- Aerial photograph 1947
- Horsted Keynes OS Maps 1956 (six inch to the mile)
- Horsted Keynes OS Maps 1961 (1:10000)
- Horsted Keynes OS Maps 1957 (1:25000)
- Horsted Keynes OS Maps 1974 (1:25000)
- Google earth satellite images 2001

Appendix 7 – AONB assessments of other specific sites in Horsted Keynes

Land West of Church Lane ‘Sledging Field’ #893 – 38 units (4.3ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites Oct 2018 – **HIGH IMPACT**

SHELAA Reference 893	Land west of Church Lane, Horsted Keynes	38 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Very steep site sloping down to north boundary. Pond in north-east corner.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Part of the gap between the Saxon settlement around the Church and original location of the Manor House (now occupied by the school) and the later medieval village around the intersecting routeways and commons to the south.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Church Lane is a historic routeway. A historic PROW runs along the north boundary.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	No woodland on the site but Ancient Woodland to the east and downstream from the pond.	
Field and heath <i>Field systems and meadows / heathland data</i>	Post medieval field system due to amalgamation of smaller fields.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Site is very visible from the PROW. Its development would detract from the public enjoyment of this historic landscape.	
Conclusion	High impact on the AONB due to damage to the settlement pattern of a Saxon village around the Church and a later medieval village around the intersecting routeways and commons to the south.	

Land at Police House Field #216 – 10 units (0.26ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites Oct 2018 – **MODERATE IMPACT**

SHELAA Reference 216	Land at Police House Field, Birch Grove Road/Danehill Lane, Horsted Keynes	10 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Reasonably flat site but high. No watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Adjacent to a row of houses of varying ages. Reasonably well-related to village depending on design, which should be linear in character with existing development. This could reduce capacity.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Birchgrove Road and Danehill Lane are both historic routeways.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	No Ancient Woodland on or adjacent to site but there is a small copse around the junction of routeways which probably marks the original wider junction for driving stock.	
Field and heath <i>Field systems and meadows / heathland data</i>	Part of a medieval field system according to HLC, albeit not intact due to development inserted along Birchgrove Road.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Some limited views from Birchgrove Road, Danehill Lane screened by trees.	
Conclusion	Moderate impact on AONB due to potential impact on historic routeway junction and difficulty of accommodating 10 units in a linear way. A lower number of units could reduce the impact.	

Land South of Police House #807 – 40 units (3.0 Ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites Oct 2018 – **HIGH**

IMPACT to MODERATE IMPACT with mitigation

SHELAA Reference 807	Land South of The Old Police House, Birchgrove Road, Horsted Keynes	40 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Slightly sloping to south, no watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Site comprises two fields to the south of row of houses along Birchgrove Road. The northerly field is better related to the settlement than the southerly one. Access via Birchgrove Road (via site 216) would be needed to integrate with the village. Access onto Danehill Lane would make development too isolated and separate from existing village core.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Birchgrove Road and Danehill Lane are historic routeways.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	No woodland on or adjacent to the site but some mature trees in field boundaries.	
Field and heath <i>Field systems and meadows / heathland data</i>	Part of a medieval field system.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Limited view of site from Danehill Lane access.	
Conclusion	High impact on AONB due to loss of medieval fields and development too isolated and separate from existing village core uncharacteristic of its settlement pattern. If access available from Birchgrove Road and development restricted to northern field, impact would be moderate.	

Land south of St Stephens Church #184 – 30 units (1.2ha)

Assessment from High Weald AONB Advice on Horsted Keynes SHELAA Sites Oct 2018 – **LOW**

IMPACT

SHELAA Reference 184	Land south of St. Stephens Church, Hamsland, Horsted Keynes	30 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Reasonably flat site but high. No watercourses mapped.	
Settlement <i>Historic settlement pattern and scale of development relative to settlement</i>	Immediately to south of modern development in Hamsland. Reasonably well-related to village depending on design.	
Routeways <i>Impact on adjacent historic routeways, ecology and archaeology</i>	Hamsland follows the route of a historic PROW.	
Woodland <i>On site and adjacent woodland and ancient woodland including downstream</i>	No woodland on or adjacent to site but mature trees on boundaries and within site.	
Field and heath <i>Field systems and meadows / heathland data</i>	Part of a medieval field system according to HLC, but not intact due to church and development inserted along Hamsland.	
Public Understanding and Enjoyment <i>Views, PROWs, public open space</i>	Some limited views from Hamsland.	
Conclusion	Low impact on AONB.	

Appendix 8 – Map located photographs of site #69 Jeffreys Farm, and site #893 Church Lane

SITE #69 Jeffreys Farm north field

Note Topography – 10m elevation difference from top to bottom of site
Note lack of any footpaths in vicinity



Photo 1 – View north from site #69 towards Ludwell (Listed building)



Photo 2 – View north-east from site #69 towards Boxes Farm (listed building)

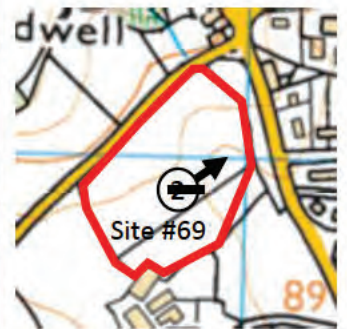


Photo 3 – View south from site #69 towards Jeffreys Farmhouse

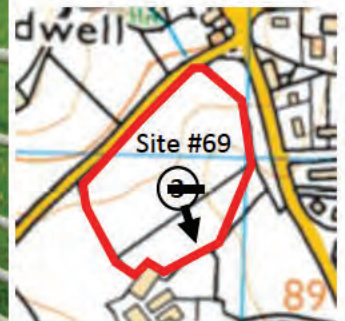


Photo 4 – View south-west from site #69

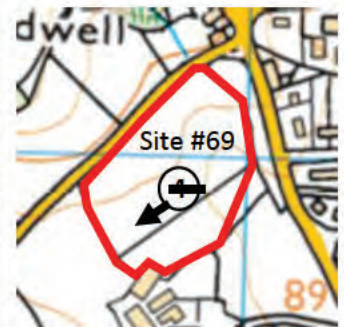
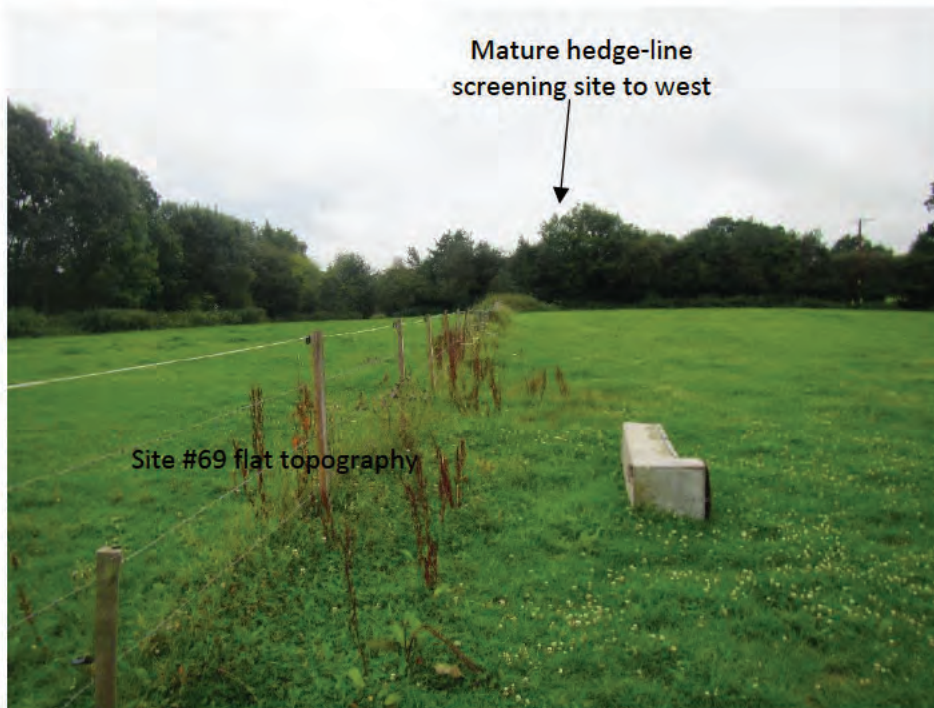


Photo 5 – View north-west from site #69 towards Keysford Lane

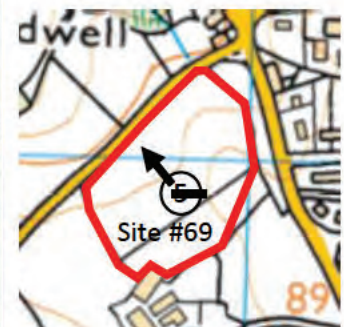
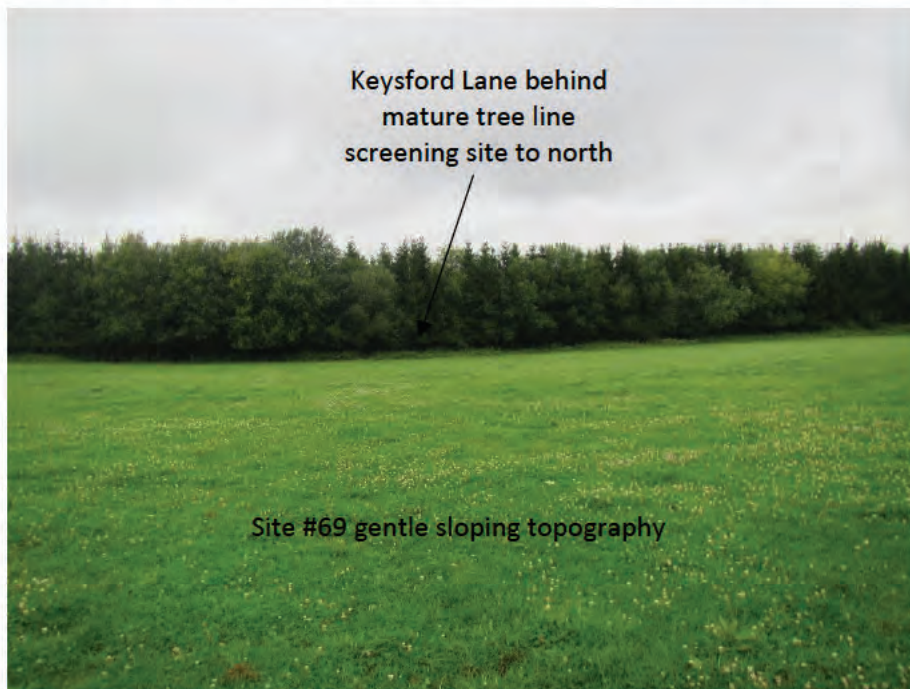
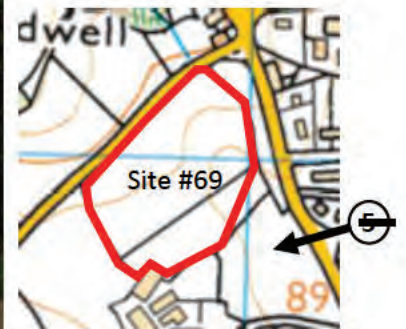
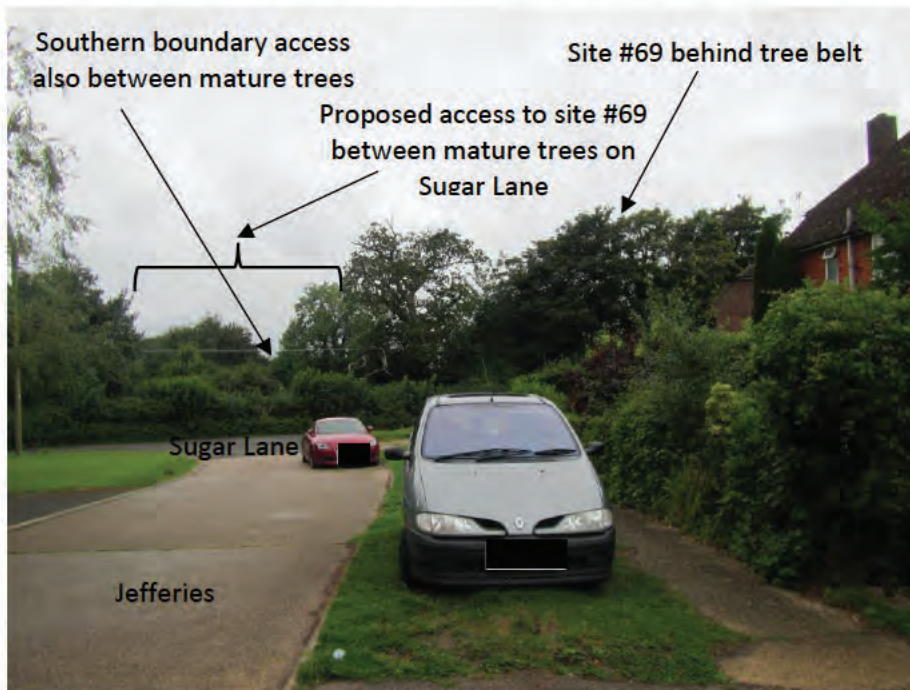


Photo 5a – View west from Jefferies across Sugar Lane to the access point in to site #69



SITE #893 Church Lane

Note Topography – 25m elevation difference from top to bottom of site

Note footpath along northern boundary

Note proximity to church (Grade I listed)

Note proximity to conservation area



Map showing Horsted Keynes Conservation Area (taken from MSDC document dated August 2018). Conservation Area outlined in green. Note Site #893 and Site #807 (both outlined in red) directly adjacent to Conservation Area.

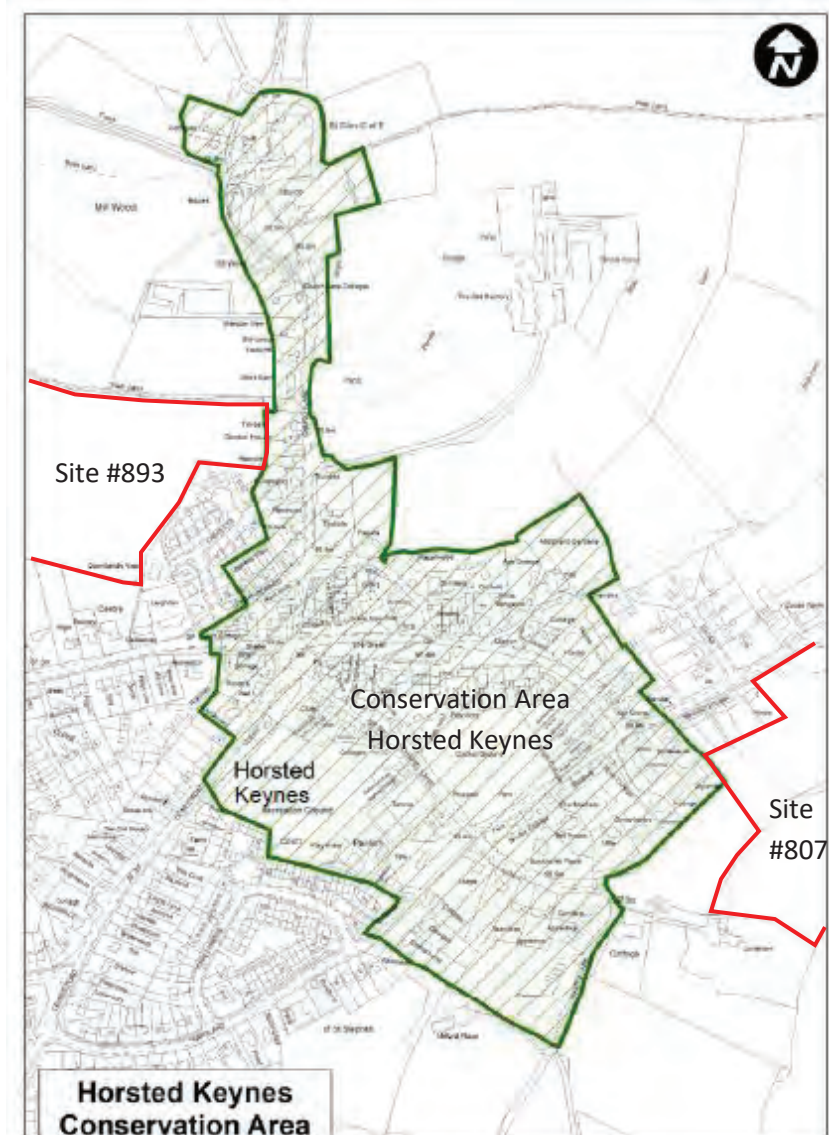


Photo 6 – View east across site #893 towards Cheeleys

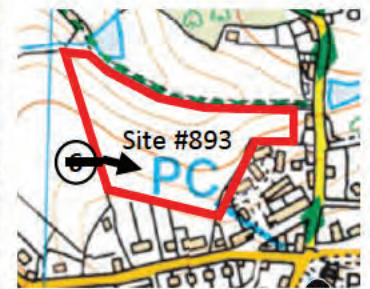


Photo 7 – View north-east across site #893 towards St Giles Church and the Conservation Area

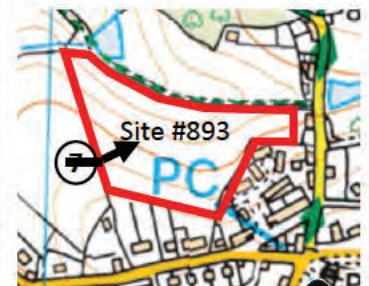
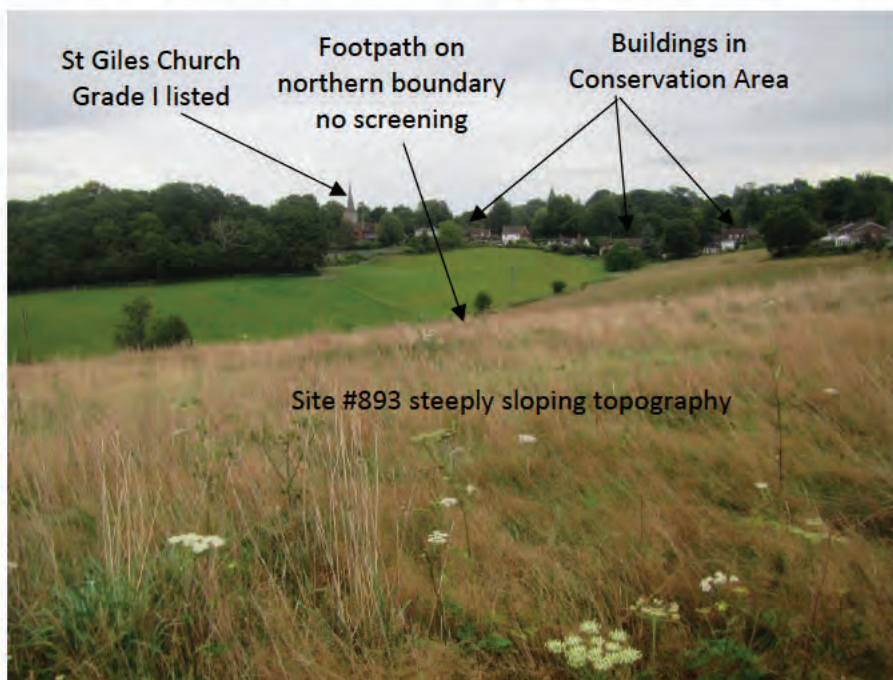


Photo 8 – View south-west across site #893

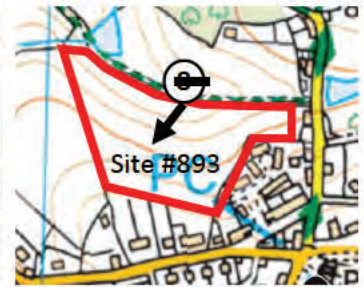


Photo 9 – View south-east across site #893 towards Cheeleys

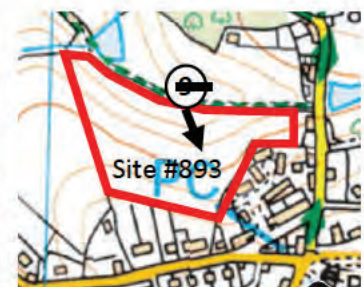


Photo 10 – View east along the northern boundary of site #893 looking along the public footpath

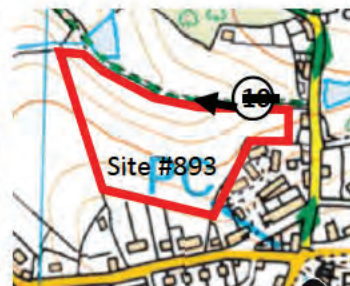
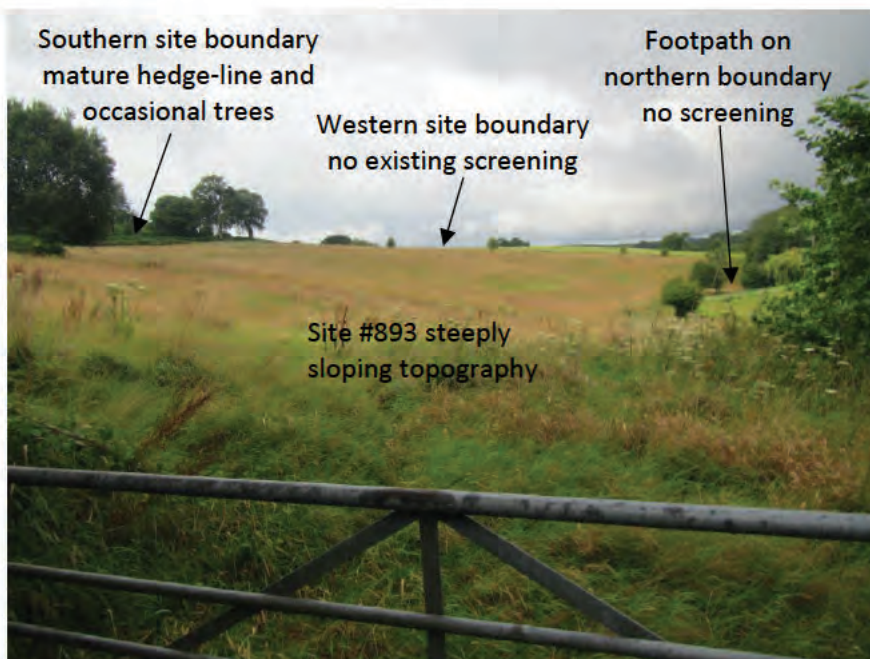


Photo 11 – View west across site #893



Appendix 9 – Map located photographs of site #184 St Stephens Field

SITE #184 St Stephens Field

Note footpath close to northern boundary

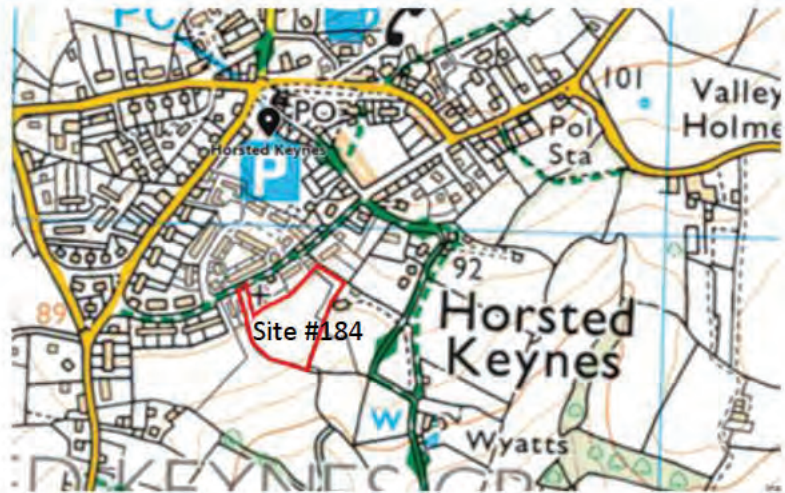


Photo 12 – View east across site #184

Northern boundary
abuts properties as
low hedge-line

Mature trees on
eastern boundary

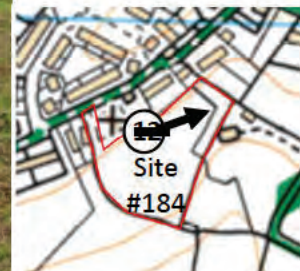


Photo 13 – View south-east across site #184



Photo 14 – View south across site #184



Photo 15 – View south-west across site #184 looking along northern boundary to site. Note as per the developers plans the trees to the right of the picture will all be removed as access road will affect root systems.

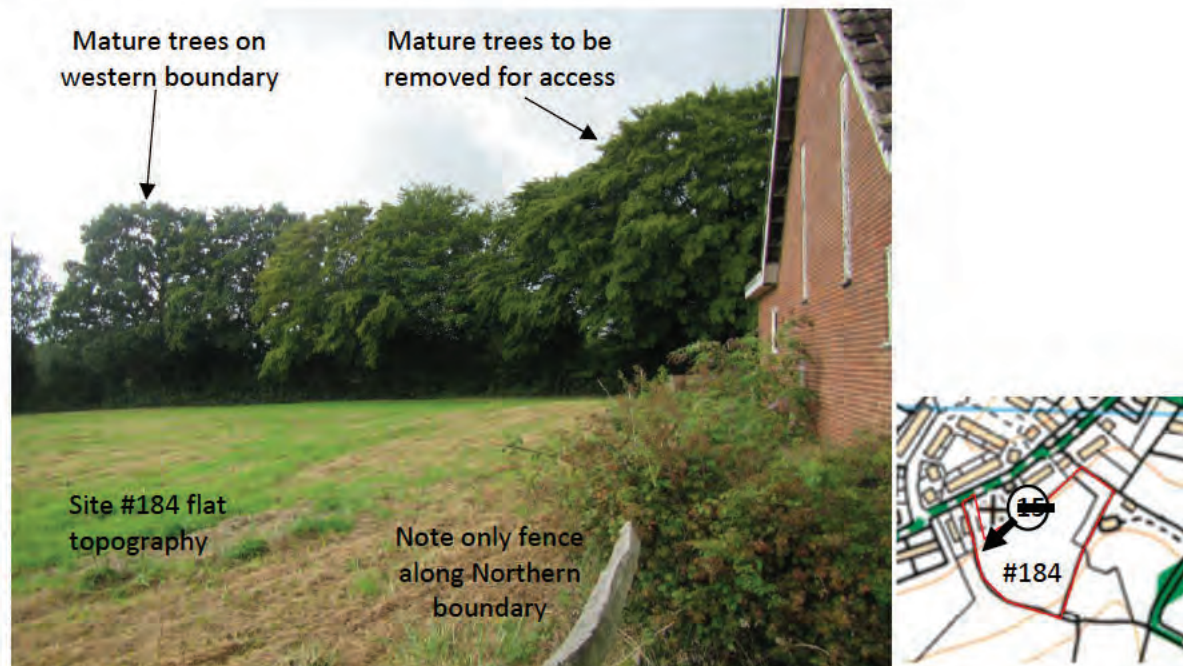


Photo 16 – View South across site #184 entrance. Note the entrance is between the post and rail fence and the treeline. The developer has said the mature trees will need to be removed for access as the access road will severely affect their root systems.



Appendix 10 – Map located photographs of site #216/807 Police House Field

SITE #216 / 807 Police House Field

Note Topography – 20m elevation difference from top to bottom of site
Note footpath across centre of site



Photo 17 – View south-west across site #216 and #807.

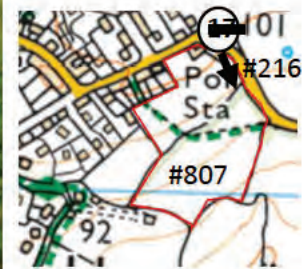


Photo 18 – View west across site #216 towards Police House.

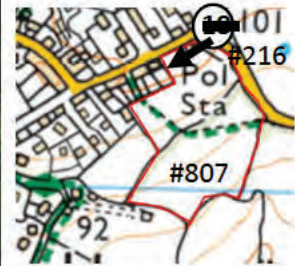
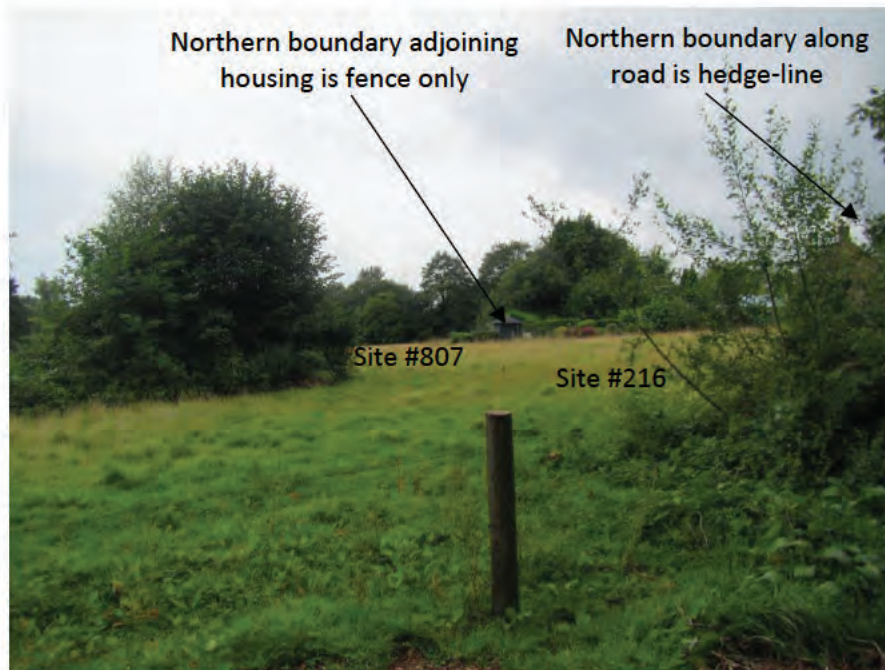


Photo 19 – View south-west across site #807 looking down the footpath that crosses the site.

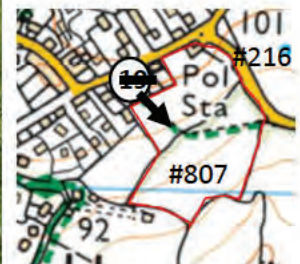
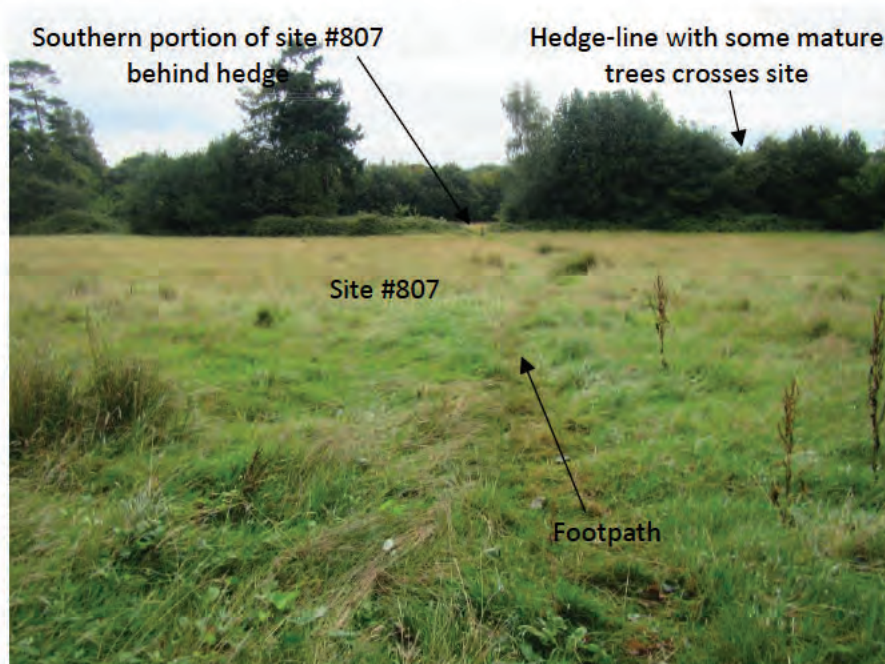


Photo 20 – View north across site #807 looking towards Police House from footpath, towards the strip of site #216 along Birch Grove Road.

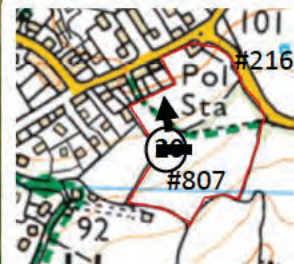
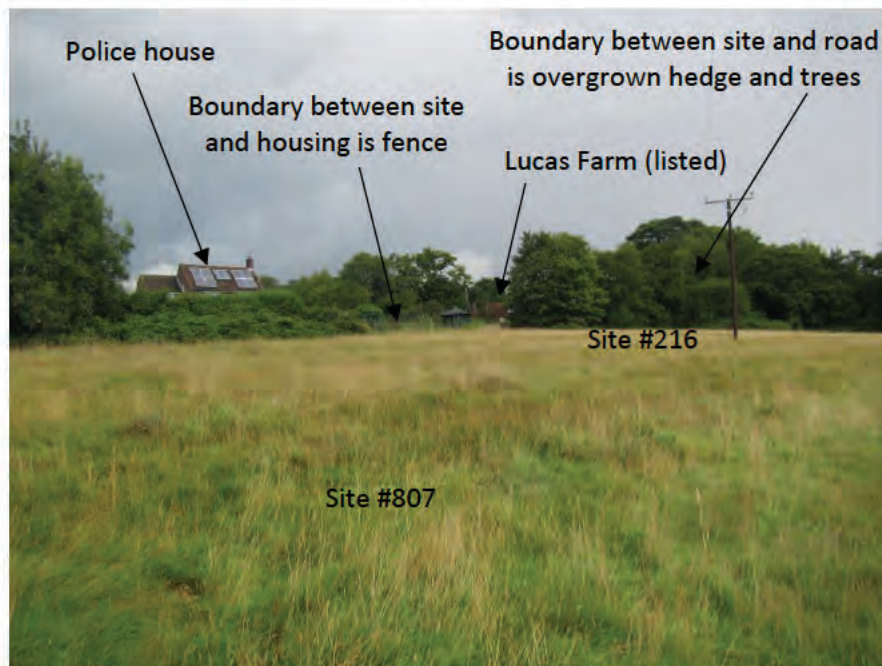


Photo 21 – View south-west along the Western boundary of site #807

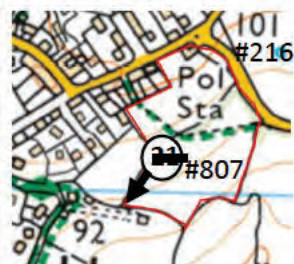
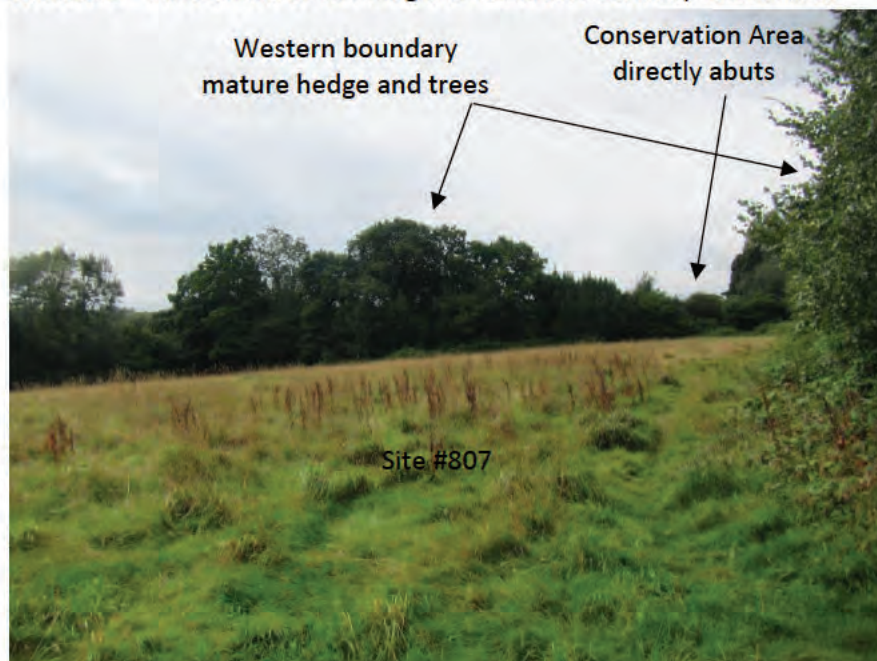


Photo 22 – View east along the footpath that crosses site #807

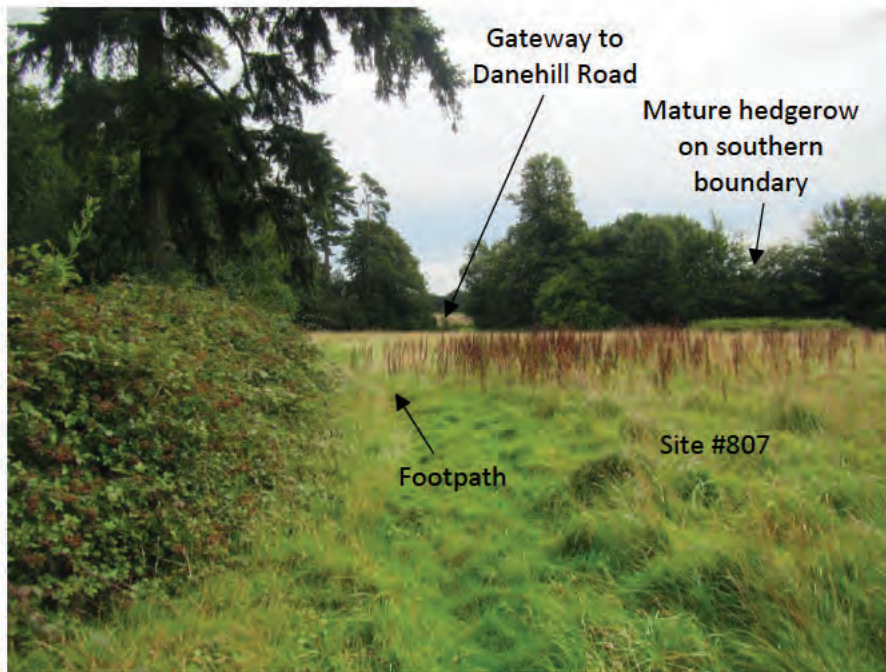
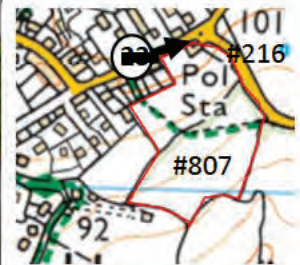


Photo 23 – View east along the northern boundary of site #216 along Birch Grove Road – access to the site will be here.





Response to challenge to AONB impact assessments of sites in Horsted Keynes

The High Weald AONB Unit

The High Weald was designated in 1983 as an Area of Outstanding Natural Beauty. It is an exceptionally beautiful medieval landscape covering 564 square miles across the counties of East and West Sussex, Kent and Surrey.

The High Weald AONB Joint Advisory Committee (JAC) is a partnership established in 1989 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory AONB Management Plan. The JAC is supported by a small, dedicated staff team, the High Weald AONB Unit, which provides advice on how to conserve and enhance the AONB. The advice provided by the AONB Unit assists public bodies and statutory undertakers to meet their duty as set out in Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect it. Due to the national importance of this landscape, 75% of our funding comes from central government.

Unlike National Park authorities, the High Weald AONB Unit is not a statutory body but an advisory one. It is not a local planning authority and the responsibility for determining planning applications and plan-making remains with the 15 local authorities. In the case of neighbourhood plans, the responsibility for preparing them lies with the Town and Parish Councils and for making (adopting) them with the 11 District and Borough Councils.

The scope of the advice provided by the High Weald AONB Unit is set by the statutory High Weald AONB Management Plan, which has been adopted by all partner authorities, as 'their policy for the management of the area and for the carrying out of their functions in relation to it'.

Background to the Advice on SHELAA Sites

Mid Sussex District Council produces a Strategic Housing and Economic Land Availability Assessment (SHELAA) to inform its plan-making and this document is also used by the Town and Parish Councils within Mid Sussex to inform their neighbourhood plans where they have chosen to allocate sites. The methodology for the SHELAA is guided by the National Planning Policy Framework and Planning Practice Guidance and is set out in detail at <https://www.midsussex.gov.uk/planning-building/strategic-housing-and-economic-land-availability-assessment/>

In the autumn of 2018 both Mid Sussex District Council and Horsted Keynes Parish Council requested assistance from the High Weald AONB Unit to assess the impact of potential sites on the AONB. This advice would then feed into the overall site assessments carried out by both organisations, which would also take into account other relevant matters.

In October 2018 the High Weald AONB Unit provided Horsted Keynes Parish Council with a report titled 'High Weald AONB Advice on Horsted Keynes SHELAA Sites' to inform its neighbourhood planning process. This report assessed the following SHELAA Sites for impact on the AONB:

- Site 68 Farm buildings, Jeffreys Farm, Horsted Keynes 18 units
- Site 184 Land south of St. Stephens Church, Hamsland, Horsted Keynes 30 units
- Site 216 Land at Police House Field, Birch Grove Road/Danehill Lane, Horsted Keynes 10 units
- Site 748 The Old Rectory, Church Lane, Horsted Keynes 40 units
- Site 780 Land at Jeffery's Farm, Sugar Lane, Horsted Keynes 80 units
- Site 781 Land to the south of Robyns Barn, Birchgrove Road, Horsted Keynes 45 units
- Site 807 Land South of The Old Police House, Birchgrove Road, Horsted Keynes 40 units
- Site 893 Land west of Church Lane, Horsted Keynes 38 units
- Site 945 Lucas Farm, Birch Grove Road, Horsted Keynes – Revised Access October 2018 30 units
- Site 67 Castle Field, Cinder Hill Lane capacity unknown
- Site 837 Land at Little Oddynes Farm, Waterbury Hill capacity unknown
- Site 663 Field 1, Ludwell Grange, Keysford Lane capacity unknown
- Site 664 Field 2, Ludwell Grange, Keysford Lane capacity unknown

Also in October 2018 the High Weald AONB Unit provided Mid Sussex District Council with a report titled 'High Weald AONB Advice on Mid Sussex SHELAA Sites' to inform the District Council's evidence gathering for the Site Allocations Document. This report covered a wider area but used the same methodology as the Horsted Keynes report and included the same sites and site assessments in Horsted Keynes with the exception of sites 67, 837, 663 and 664 which Mid Sussex District Council had excluded from their site assessment process.

In May 2019 the High Weald AONB Unit provided Mid Sussex District Council with an Addendum for the following amended sites:

- Ashhurst Wood - parcel of site 207
- Horsted Keynes – sites 69 and 971 (parcels of site 780)

The amended Horsted Keynes sites were also provided to Horsted Keynes Parish Council for information.

Methodology for the Reports

The methodology for the reports is set out in their introductions. The advice from the High Weald AONB Unit takes the form of an assessment of each site against the five landscape components identified on the High Weald AONB Management Plan. These are:

- Geology, landform, water systems and climate (topography and watercourses)
- Settlement (historic settlement pattern and scale of development relative to settlement)
- Routeways (impact on adjacent historic routeways, ecology and archaeology)
- Woodland (on site and adjacent woodland and ancient woodland including downstream)
- Field and heath (field systems and meadows / heathland data).

The sites are also assessed against the Management Plan's objectives for Public Understanding and Enjoyment, including views (where known), enjoyment of public rights of way and public open space.

An overall conclusion is provided as follows:

- High impact on the AONB
- Moderate impact on the AONB or
- Low impact on the AONB.

This was a desktop assessment based on the AONB Unit's datasets (metadata included within the reports) and it was clearly stated that they would need to be supplemented by evidence on visual impact. It was also highlighted that this assessment only considered impact on the AONB and there will be other planning considerations which may affect the overall rating for sites in the final published SHELAA by Mid Sussex District Council or the site assessment work carried out by Horsted Keynes Parish Council.

Response to Concerns Raised by Dr. H. Griffiths

It is unclear which of these assessments was a 'desktop assessment', and which have involved site visits. The landowners met the AONB Planning officer, together with the Parish Council planning consultant on site by coincidence earlier this year (June 2019).

All the site assessments were carried out as desktop assessments as stated in the report methodology. The site meeting in June 2019 took place after the assessments were completed and was between the High Weald AONB Planning Advisor and the Planning Consultant acting for the Parish Council.

1. Recent AONB re-assessment of site #69 - May 2019

The reduction in the site area at Jeffreys Farm was considered in the May 2019 Addendum and the reference to the medieval field and scale of development removed. However, the impact was still considered high because development would be out of character with the settlement pattern of Horsted Keynes.

The AONB assessments were based on the AONB datasets and information in the SHELAA assessments available on the District Council's website, they did not take into account any further information provided by developers for the SHELAA or to support planning applications. Potential mitigation is a matter for consideration by the District Council and the Parish Council who are the decision-makers on the allocation of sites.

2. Terminology used to describe site #69 is not objective.

The description of site 69 is based on the High Weald AONB Unit's knowledge and expertise in how settlements in the High Weald developed, and particularly the characteristic dispersed development, including farmsteads, which occurs across the landscape compared to the denser, more consolidated development that characterises the later villages. This site is clearly part of a farmstead and is therefore different in character to the village to the east of Sugar Lane. Screening is not relevant to the assessment of historic settlement pattern, but is referred to in the section on Public Understanding and Enjoyment where it states "Very limited views into the site from routeways due to mature hedgerows and trees".

3. Uncertainly over the age of the farmstead at Jeffreys Farm

Given the intact medieval nature of some of the farmstead's other fields, it is likely that the farmstead itself was medieval whatever the age of the current farmhouse.

4. Conclusion comments for site #69 show little knowledge or understanding of how Horsted Keynes has developed since the Second World War

The AONB assessment relates to historic settlement pattern, which is protected by objective S2 of the High Weald AONB Management Plan. Twentieth century additions to the village are not relevant to this assessment. Nonetheless, the development on the east side of Sugar Lane is of a denser, more consolidated character compared to the dispersed development beyond Sugar Lane.

5. The AONB assessment of site #69 does not appear to be comparable with other site assessments in the village.

A. Comparing site #69 with site #893 in Church Lane

Impact on a Conservation Area or listed buildings are not factors that are taken into account in the AONB assessment. These are examples of the other planning considerations that the District and Parish Council would need to take into account before deciding whether to allocate a site but it is not part of the methodology for the AONB assessments. As previously stated, the potential for mitigation is also not considered as part of these assessments as that is a matter for the determining Council.

It is accepted that the topography of site 893 is steep, and this is reflected in the section on Geology and Landform. Similarly the presence of the footpath and views from it are reflected in the Public Understanding and Enjoyment section for site 893.

The overall reasons why sites have been assessed as major are set out in the Conclusions – for site 68 that is “High impact on AONB as development would be out of character with the settlement pattern of Horsted Keynes” and for site 893 “High impact on the AONB due to damage to the settlement pattern of a Saxon village around the Church and a later medieval village around the intersecting routeways and commons to the south”. They will not be “directly comparable” to each other because each site has different characteristics.

B. Comparing site #69 with site # 184 St Stephens Field

The removal of mature trees to access site 184 was not considered as part of the AONB assessment because this information was not available in the SHELAA. It is understood that it may now be a feature of pre-application discussions on the site but that was not the basis of the October 2018 assessment report.

The section on Public Understanding and Enjoyment for site 184 acknowledges that there will be some limited views from Hamsland. These are mostly limited by St Stephens Church which is located in front of the site.

Under the section on settlement it states that site 184 is immediately to the south of modern development in Hamsland and is reasonably well-related to the village depending on design. Unlike the situation at site 69, there is continuous development on both sides of Hamsland up to the site and the field is not legible as part of a separate farmstead. Whilst the field is medieval in origin, it is

no longer intact because the church development has already removed the northern part of it. As with all heritage assets, the degree of intactness affects its value.

Dr Griffiths has queried why a development of 22 houses on site 69 is considered to be out of character with the settlement pattern, yet a development of 30 houses on site 184 is not. The conclusion on site 69 is about the location of development on the western side of Sugar Lane where the settlement character is very different to that on the eastern side. It is not about the scale of the development.

C. Comparing site #69 to site # 216 and #807 at Police House Field

No information was available at the time of the AONB assessment suggesting that mature trees or hedgerows would need to be removed so this was not taken into account. In terms of settlement pattern, site 216 would continue the line of cottages along Birchgrove Road and the northern part of site 807 would continue development behind this. There is no road separating the sites from the rest of the village in the way that site 69 is separated and the fields are not legible as part of a farmstead in the same way as Jeffreys Farm. Therefore sites 216 with the northern field of 807 would be more sympathetic to the historic settlement pattern. However, they undoubtedly do have adverse impacts on the AONB, including on medieval field systems, which is why they score as moderate rather than low.

6. The AONB assessment of sites seems to be a simple and basic qualitative process, rather than a quantitative process and as a result is open to wildly different interpretation by different assessors.

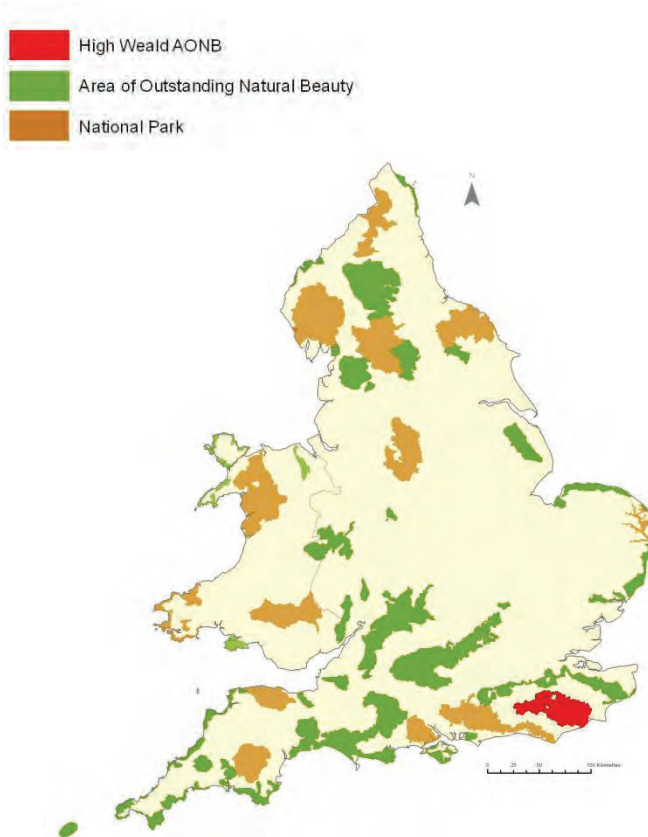
All site assessments are largely a matter of informed judgement rather than a numerical exercise that can be definitively quantified. We have made the AONB assessments as objective and transparent as possible by using a consistent template, linking the criteria directly to the High Weald AONB Management Plan objectives and including information about the sources of the data we have used in the report. The reports include the methodology used and the data we have relied on, and also make it clear that the AONB assessment is only part of the picture and that the District and Parish Councils will also need to take into account other factors in coming to decisions on site allocations. These will include impacts on Conservation Areas and listed buildings.

Importantly the reports also make clear that the assessment is desk based and that further evidence on visual impact will be required. Many of Dr Griffiths' comments relate to the relative screening of sites. Whilst the AONB datasets include woodland, historic hedgerows and contour lines the effect on views in and out of a site can really only be assessed on site. It should be noted though that screening by vegetation may only be temporary and inappropriate development in an AONB should not be justified on the basis that it can't currently be seen.

Where judgements are evaluative rather than just statements of fact it is open to anyone to submit their own different views as part of the public consultations on the planning documents that these assessments inform, in this case the Horsted Keynes Neighbourhood Plan and the Mid Sussex Site Allocations document. It is understood that the latter will be going out for public consultation in October 2019 for six weeks.

08.10.19.

Appendix 1



The High Weald: a cultural landscape

The High Weald is a special place. Its dispersed settlements, ancient routeways, abundant ancient woodland, extensive open heaths, and small, irregular shaped and productive fields are draped over rolling hills of clay and sandstone that together create a unique landscape distinct from other parts of Sussex, Surrey, and Kent and the rest of Britain.

The High Weald's distinctive countryside arises from a long history of human interaction and collaboration with the natural environment. Its main features were established by the fourteenth century and these features have either survived or been fortified by a number of subsequent historical events and social and technological changes.

The High Weald is essentially a cultural landscape and is considered as one of the best surviving coherent medieval landscapes in northern Europe. This is why the High Weald is considered worthy of protection – it has remained a unique, distinct, and

homogenous area for at least the last 700 years.

In recognition of the national importance of its landscape, the High Weald was designated an Area of Outstanding Natural Beauty (AONB) in 1983 and joined a family of 46 other AONBs and 13 National Parks across England, Wales and Northern Ireland.

The High Weald Joint Advisory Committee (JAC)

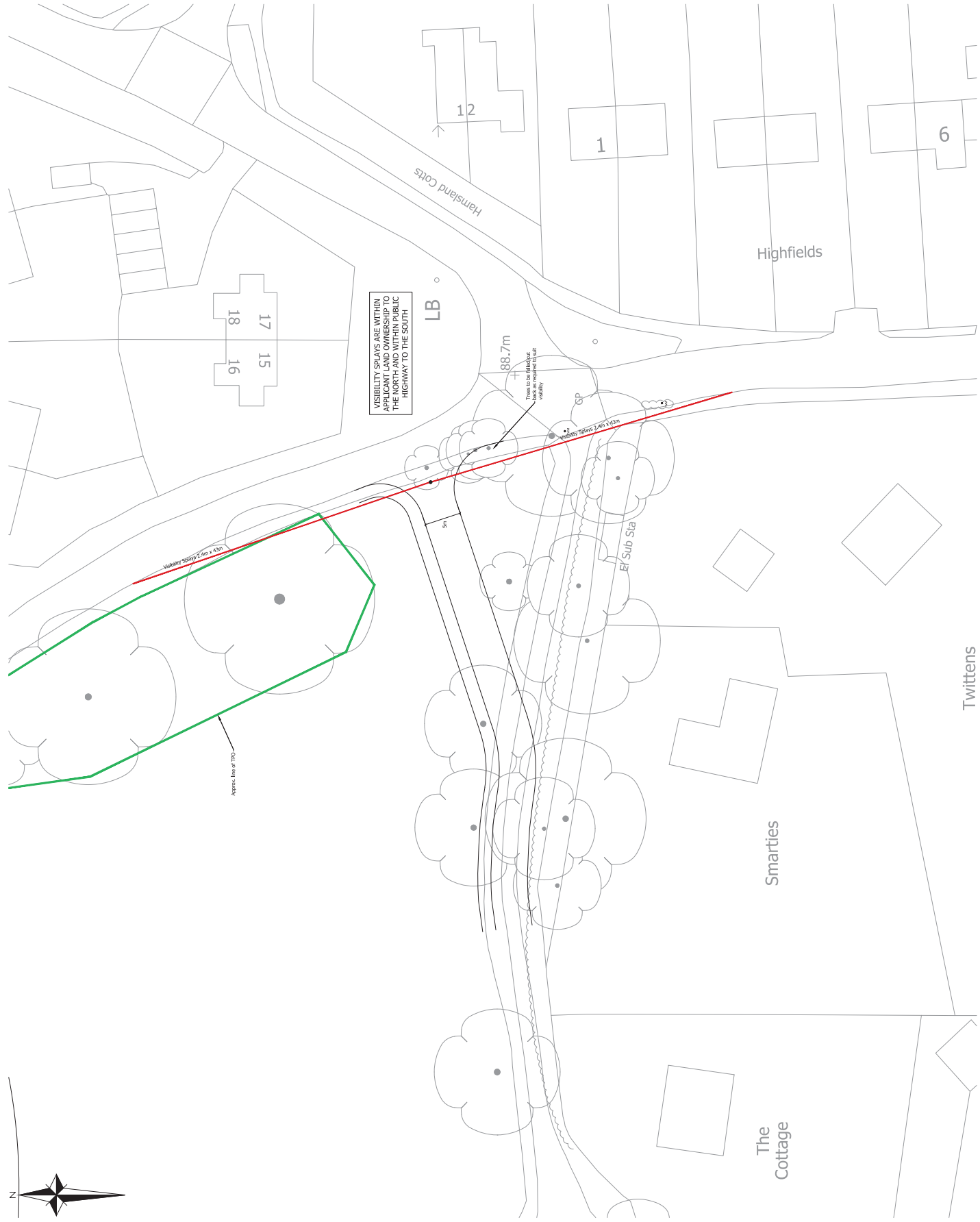
The High Weald Joint Advisory Committee (JAC) is a partnership of 15 local authorities, the Department for Environment, Food and Rural Affairs, Natural England, the National Farmers Union, the Country Land and Business Association, Action in Rural Sussex, and the Forestry Commission.

The High Weald AONB Unit

The JAC is supported by the High Weald AONB Unit, a small multi-disciplinary team. The AONB Unit aims to increase the understanding of the High Weald landscape's special qualities and provide information, advice and support to organizations and local people on action and policy to help conserve and manage the area (for more information visit www.highweald.org).

GENERAL NOTES

1. The location, size, depth and identification of existing services that may be shown or referred to on this drawing have been assumed from non-surveyed information. It is the responsibility of the contractor to verify the location and depth of all services before commencing work to satisfy himself that it is safe to proceed and that the proposed works will not interfere with any existing services. Any discrepancies shall be notified to the client prior to works commencing.
2. Trench or laying drawings shall not be used for construction or the ordering of materials.
3. Do not scale. All dimensions and levels to be site confirmed.
4. This drawing shall be read in conjunction with all relevant architects, engineers, landscape architects and specifications, together with 1053 plans.
5. Copyright: This drawing must not be copied, amended nor reproduced without the prior written agreement of gta.
6. All drawings, specifications and recommendations made by gta are for the use of the client and are not to be used for any other purpose. gta shall not be responsible for any claims or damages arising from the use of these drawings in connection with any other project or for any other reason. gta shall not be responsible for any claims or damages arising from the use of these drawings in connection with any other project or for any other reason.



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Transport Statement

Proposed Development on the Land at Jeffrey's Farm,
Horsted Keynes, West Sussex



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- B Development Proposals
- C TRICS Analysis
- D Stage 1 Road Safety Audit & Designer's Response
- E Proposed access and footway improvements

Issue	Issue date	Compiled	Checked	Authorised
DRAFT	24 th August 2016	RS	RW	LNS
2nd Issue	15 th September 2016	RS	RW	LNS
Final	4 th October 2016	RS	RW	LNS

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Executive Summary

The proposed development is to provide a new access to serve 42 new residential dwellings on the land at Jeffrey's Farm, Horsted Keynes, West Sussex. The site covers a total area measuring over 1 hectare.

The Horsted Keynes Parish Council's emerging Neighbourhood Plan has identified broad locations for new housing in Horsted Keynes delivering around 125 units within the Plan period. One of the locations identified in the review are the Jeffrey's Farm buildings and the land to the north of the farm buildings, covering a total area of 1.77 hectares to deliver circa 42 units.

The front field at Jeffrey's Farm was also identified as a potential location for future housing, however the discussion document for this site showed there is a covenant which restricts building on the site to a pavilion (for sports fields) and therefore, this site could not be developed for residential use but could be used to provide access to the site.

Access to the development is proposed via a new vehicular access from Sugar Lane, this meets with West Sussex County Council and Manual for Streets guidance. The proposals also consist of providing an informal pedestrian crossing and a new footway link to improve the general footway connectivity between the site and the village centre. The access and footway improvements have been subject to a Stage 1 Road Safety Audit and Designer's Response.

On site, car and cycle parking will be provided in accordance with West Sussex County Council standards.

The nationally recognised TRICS database has been used to establish the likely trips associated with the proposed use of the site. The development is likely to result in 18 vehicle trips in the AM & PM peak hours. These trips can easily be accommodated on the local highway network.

Refuse and emergency vehicles will enter the site from Sugar Lane via the proposed access. The proposed access road will be laid out so that emergency and refuse vehicles can enter and turn on site within the proposed turning head and exit the site in forward gear.

Overall, there are no unacceptable highway or transport impacts as a result of the proposed development.

1 Introduction

- 1.1 This report has been prepared for Helena Griffiths in conjunction with the above development and no responsibility is accepted to any third party for all or part of this study in connection with this or any other development.
- 1.2 GTA Civils Ltd has been commissioned by Helena Griffiths to prepare an Access Strategy Report in connection with developing the land at Jeffrey's Farm, Horsted Keynes, West Sussex.

The Report

- 1.3 This Transport Statement has been written to include the following scope of work:
 - Detailed review of the local highway network;
 - Acquire, examine and report on appropriate accident data;
 - Detail relevant national & local planning and transport policies;
 - Estimate person and vehicle trip generation using the TRICS database;
 - Detailed review of impact of the traffic generated from the development on the local network;
 - Assess the accessibility by all transport modes and to local facilities;
 - Review any local transport issues and their relevance to the site;
 - Review of the internal layout of the development with reference to relevant guidance documents including emergency access;
 - Consider car & cycle parking requirements and their compliance with WSCC standards;
 - Provide a framework Travel Plan (please note that this is not a fully detailed Travel Plan usually developed post planning);
 - Recommend appropriate mitigation if required

2 Policy Context

National Planning Policy Framework (March 2012)

2.1 *Planning should drive and support sustainable economic development. It should:*

- *secure high quality design and good standard of amenity;*
- *take account of the different roles of areas, recognising the intrinsic character and beauty of the countryside;*
- *support transition to a low carbon future in a changing climate, taking account of flood risk and encourage the reuse of existing resources and encouraging the use of renewable resources;*
- *contribute to conserving and enhancing the natural environment and reducing pollution;*
- *encourage the effective use of land by reusing land that has been previously developed;*
- *conserve heritage assets in a manner appropriate to their significance;*
- *focus significant development in locations which are, or can be made sustainable.*

2.2 *Paragraphs 115 and 116: "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.*

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that should be moderated".*

National Planning Practice Guidance

2.3 National Planning Practice Guidance (NPPG) is supplementary advice intended to expand on and support the principals and practices of the National Planning Policy Framework (NPPF). It is managed and maintained by the Department of Communities & Local Government. Amongst other

things, NPPG provides advice on the need for, and the preparation of, Travel Plans, Transport Statements and Transport Assessments.

2.4 NPPG states that Travel Plans, Transport Assessments and Transport Statements can positively contribute to:

- encouraging sustainable travel;
- lessening traffic generation and its detrimental impacts;
- reducing carbon emissions and climate impacts;
- creating accessible, connected, inclusive communities;
- improving health outcomes and quality of life;
- improving road safety; and
- reducing the need for new development to increase existing road capacity or provide new roads.

2.5 NPPG advises that the key transport issues to be considered in a transport evidence base should:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms; and
- consider the cumulative impacts of existing and proposed development on transport networks.

Horsted Keynes Parish Council's Pre-Submission Neighbourhood Plan (2016-31)

2.6 In total 25 sites were put forward for consideration as housing sites. The proposed application site has been split into 5 site allocation sections within the emerging draft Horsted Keynes Neighbourhood Plan (HKNP), these are as follows:

- | | | |
|---------------------------|-------------------------------------------------|----------------------|
| • HKNP013 | Jeffrey's Farm Buildings | 1 hectare |
| • HKNP014 | Land north of farm buildings (A) Jeffrey's Farm | 0.77 hectares |
| • HKNP015 | Land north of farm buildings (B) Jeffrey's Farm | 1.5 hectares |
| • HKNP016 | Sugar Lane Field | 0.85 hectares |
| • HKNP017 | Jeffrey's Farm Field | 1.2 hectares |
| • Total Site Area: | | 5.32 hectares |

2.7 Site 017 was assessed as being unavailable for use as a housing site. The Sustainability Assessments summarised that *'the site has potential for a range of community needs. If pedestrian access across Sugar Lane could be provided and appropriate screening and design used to minimise the landscape*

impact of development from the west, then the site is considered to have reasonable potential'. Sites 013 – 016 were fully assessed, the summary of the Sustainability Assessments for these sites are shown below in Table 1.1.

Table 1.1 – Summary of Sustainability Assessments (HKNP Sites 013 – 016)

HKNP013	HKNP014	HKNP015	HKNP016
The site on its own is poorly related to the village. If developed along with HKNP017, and if the southern half of the site is left open for public green open space and possibly community uses then it has much better potential. The impact on the landscape and views is a possible issue.	The site on its own is poorly related to the village. If developed along with HKNP017, and if the western half of the site is left open for public green open space and possibly community uses then it has much better potential. The impact on the landscape and views is a possible issue.	The site on its own is poorly related to the village. If developed along with HKNP016, and if the western half of the site is left open for public green open space and possibly community uses then it has better potential. However, the lack of pedestrian access is a fundamental constraint.	The site on its own is not well related to the village. However, if developed along with HKNP017, then it has good potential, provided improved pedestrian access is provided across Sugar Lane. Impact on the landscape could be a possible issue.

- 2.8 Overall, the development will consist of site 017 as public green open space / community use to serve the whole community, and could be a possible access location providing a potential dedicated pedestrian crossing over Sugar Lane in order to access the centre of the village on foot. Site 016 could be developed to form a new access to serve the site via Keysford Lane which would require a drop in levels down to any junction. Sites 013, 014 and 015 will be developable to provide housing to meet the needs of the HKNP, on the 3.27 hectare area there is capacity for up to 65 – 80 dwellings although the exact number of dwellings is likely to be much less than this and is yet to be agreed upon.

3 Existing Site Details

Site Location

- 3.1 The site is located at Jeffrey's Farm within Horsted Keynes in the area administered by Mid Sussex District Council. The location of the site for the proposed new residential dwellings are shown in red below in **Figure 1**. See **Appendix A** for a map showing the allocated sites as shown within the Sustainability Appraisal (incorporating SEA) Scoping Report.

Figure 1 – Aerial View of Site Location



- 3.2 The area in the south eastern corner of the site, adjacent the Jeffrey's Farm House, is Jeffrey's Farm Field, identified as site HKNP 017, a potential location for future housing. However the discussion document for this site showed there is a covenant which restricts building on the site to a pavilion (for sports fields) and therefore, this site could not be developed for residential use. Although, a

new access to serve the site in this location may be possible. The area marked grey is Jeffrey's Farm House and is under third party ownership and is included as site 017.

Existing Use / Access

- 3.3 The existing use of the site is predominantly agriculture associated with Jeffrey's Farm.
- 3.4 The site has some existing field accesses located on Sugar Lane. There is an existing access road off Sugar Lane serving Jeffrey's Farm and other properties which runs along the southern end of the site. The existing accesses are sub-standard, narrow, and are not suitable for use as the main entrance to the proposed residential site.

4 Local Highway Network

- 4.1 Keysford Lane is subject to the national speed limit of 60mph and has grass verges on both sides. There is a 30mph speed restriction at the north-eastern end of Keysford Lane. It is a relatively straight road with generally good visibility. There is no street lighting provided along the length of the road in the vicinity of the site. To the west Keysford Lane connects to Stonecross Lane and Park Lane which provide a road link to the B2028. To the east Keysford Lane ends at the junction with Sugar Lane on the north-western edge of Horsted Keynes village. At the junction with Sugar Lane there is a footpath on the grass verge adjacent to the junction, providing pedestrian access from Sugar Lane to the gated entrance on Keysford Lane.
- 4.2 Sugar Lane runs from the southern end of the site to the northern end. The entire length of the road is subject to a 30mph speed limit and is considered to be lightly trafficked. There is no street lighting or footways provided along Sugar Lane. There is a grass verge which runs along the eastern side of the road for most of its length. To the north, Sugar Lane terminates at a junction with Station Road/Waterbury Hill. To the south, Sugar Lane becomes Treemans Road at the junction with Lewes Road. The 30mph speed restriction on Sugar Lane/Treemans Road extends up to around 330m south of the junction with the Lewes Road, at this point Treemans Road is subject to the national speed limit for the remainder of its length.
- 4.3 Both roads have a carriageway width of around 5 – 5.5m. There are no parking restrictions along Sugar Lane or Keysford Lane within the vicinity of the site. At the time of the site visit not much on-street parking took place along these roads as most of the properties along Sugar Lane have their own off-street parking areas provided.
- 4.4 The direct vicinity of the site to the east is predominantly residential in nature and many local amenities are situated in the village centre to the east of the site. There are a number of residential properties located along Sugar Lane and therefore many of the local roads to the east of the site have footways and street lighting provided.
- 4.5 There are existing bus stops located on Church Lane, approximately 520m (westbound) and 530m (eastbound) north-east of the proposed access location to the site on Sugar Lane. These stops are situated at the village centre within short walking distance. These stops are frequently served by service number 270 which provides connections to Wivelsfield Station, Haywards Heath Princess Royal Hospital, Horsted Keynes Station, Brighton Churchill Square and East Grinstead.

Accident Data

- 4.6 Crash map records have been examined for Keysford Lane and Sugar Road in the area surrounding the site. This includes a total area covering approximately 590m (from the western boundary of the site on Keysford Lane, the junction with Sugar Lane to the east, extending south along Sugar Lane, past Jefferies, to the southern boundary of the site) for the three year period from 2011 to 2014.
- 4.7 There was a total of 1 slight incident on the stretch of road. The incident is summarised below:
- **Severity:** Slight **Date of incident:** 02/04/2011
Location: Sugar Lane junction with Keysford Lane/Station Road
No. of vehicles involved: 2 **No. of casualties involved:** 1
- 4.8 The above accident data has been assessed and it is concluded the above incidents are unrelated to the proposed development.

5 Modal Choices

- 5.1 Details and frequencies of local transport available and the overall accessibility of the site is outlined below.

Public Transport – Bus

- 5.2 There nearest bus stops to the site are situated on Church Lane, approximately 520m (westbound) – 530m (eastbound) north-east of the proposed access location to the site on Sugar Lane. These stops are situated at the village centre and are provided with timetable information, the westbound stop is also provided with a sheltered seating area.
- 5.3 These stops provide for the No. 270 bus service. Service frequency is set out in **Table 5.1**.

Table 5.1 – Bus services serving the site

Service No./Route	Average Frequency		
	Monday to Friday	Saturdays	Sundays
270 – East Grinstead – Horsted Keynes – Haywards Heath – Brighton	Hourly service	Hourly service	n/a

Public Transport – Rail

- 5.4 The Horsted Keynes railway station is the closest station to the site and is located around 1.8km north-west of the proposed access location on Sugar Lane, this equates to a 22 minute walk time. The station is 1.5 miles north-west of the village centre.
- 5.5 Metrobus 270 calls at Horsted Keynes station each Saturday from Haywards Heath and East Grinstead, the total journey time is around 15 minutes to travel from the site to the railway station.
- 5.6 At Horsted Keynes station, there is a large unmarked car parking area in the field beyond. Hard surface for about 30 cars with the additional field in summer for up to 100 cars.
- 5.7 Horsted Keynes railway station is a preserved railway station on the Bluebell Railway line in Sussex. The Bluebell Railway has two services. Service one is a weekday service only providing a connection from Sheffield Park to East Grinstead with only 3 services per day. Service two is the peak service with two-steam hauled trains running between Sheffield Park and East Grinstead with up to 7 services a day.

- 5.8 Haywards Heath is the nearest train station with regular services on the Brighton Main Line and Thameslink. The station is situated around 4.5 miles south west of the site. The 270 bus serves this station, therefore, future residents of the site could walk to the bus stops on Church Lane and catch the 270 bus service to Haywards Heath, this total journey would take around 24 minutes.

Walk / Cycle Facilities

- 5.9 There is generally relatively good footpath connectivity between the northern end of the site (at the Sugar Lane / Keysford Lane junction) and the village centre where there are local pubs and some small shops and other local amenities via Station Road. There is an approximately 2 metre wide footway provided along Station Road on alternating sides for most of its length.
- 5.10 For the southern end of the site, Jefferies and Lewes Road have footways provided on one side of the road giving easy access to the eastern end of Station Road. These footways connect to the village centre and the local facilities.
- 5.11 Although there are no footways along Keysford Lane and Sugar Lane (other than the narrow footpath adjacent to the Keysford Lane/Sugar Lane junction) there are narrow grass verges on Keysford Lane and Sugar Lane for most of the road lengths.
- 5.12 Many of the local roads are cycle friendly due to low vehicle speeds however there are no marked cycle trails or dedicated lanes within the direct vicinity of the site. Although there are no cycle paths / dedicated cycle lanes close to the site, there are number of local facilities that lie within the standard 5km cycle radius.
- 5.13 There are a number of local amenities (including local food establishments and retail shops) located on Station Road and further north of the site. The site and essential facilities are relatively easily accessible for pedestrians, see below distances and travel times from the site:
- Local Preschool (Village Hall) – 8 minute walk (600m)
 - Local Primary School – 10 minute walk (800m)
 - Local convenience store/newsagents (Station Rd) – 4 minute cycle journey (1.4km)
 - Local food establishments/pubs (Station Rd) – 7-8 minute walk (540m-600m)
 - Local places of worship – 9 minute walk (750m)
 - Community building/Youth club – 6 minute walk (520m)

6 Proposed Development

General

- 6.1 The proposed development is for the construction of 42 dwellings together with a community pavilion/hall of around 200sqm. The site is located on the land north of Jeffrey's Farm.
- 6.2 Horsted Keynes Parish Council's emerging Neighbourhood Plan has identified broad locations for future housing in Horsted Keynes delivering around 125 units within the Plan period. The locations identified are the Jeffrey's Farm buildings (013), the land to the north of the farm buildings (014/015), Sugar Lane field (016) and Jeffreys Farm field (017), covering a total area of 5.32 hectares to deliver circa 65 – 80 units.
- 6.3 A new vehicular access will be formed as part of the development providing improved visibility onto Sugar Lane. The available visibility splays are marked on the proposed layout plans in **Appendix B**.
- 6.4 Good pedestrian and cycle connectivity is important within the layout of the sites with connections through to the existing village.
- 6.5 An informal pedestrian crossover will be formed providing a safe crossing point from the site to the grass verge situated at the Sugar Lane junction with Jefferies. A footpath will be provided across the grass verge. This will provide a link to the footway provided on the north side of Jefferies where there is an existing footway leading to Lewes Road which provides a safe walking route to the centre of the village.
- 6.6 The access and footway improvements has been subject to a Stage 1 Road Safety Audit (RSA1). This highlighted a concern with regard to visibility northwards for pedestrian crossing Sugar Lane. As a result, the informal crossing point has been relocated to the southern side of the access road where visibility is adequate. The revised layout for the informal pedestrian crossing in Sugar Lane is included in **Appendix E**. This is picked up in the Designer's Response. Both the RSA1 and Designer's Response are included in **Appendix D**.
- 6.7 The internal layout of the development is in accordance with Manual for Streets and West Sussex County Council Local Design Guide. The layouts have been designed to achieve a vehicle speed of less than 20mph.

Access

- 6.8 The site access road is proposed as indicated on the layout plan in **Appendix B**. The proposed access will be surfaced and 5m wide to allow cars to pass one another. The access width has been

designed in accordance with various guides such as Manual for Streets 1 and local guides such as the West Sussex County Council Local Design Guide. Based on the number of units the access will serve, a minimum width of 4.8m is required and therefore this is compliant. A 1.8m wide footway will be provided on the north side of the access road, this will link with a circular footway which will be provided on site as part of the proposals.

- 6.9 Manual for Streets 1 (MfS1) is considered to be the appropriate guidance for determining visibility splay requirements for this type of road based on the 30mph speed limit on Sugar Lane. MfS1 determines the Y distance visibility splay requirements for roads with speeds up to 37mph. It also confirms, in paragraph 7.7.6, that a distance of 2.4m is the appropriate X distance for most roads. However, the absolute minimum X distance of 2m is acceptable where roads are lightly trafficked.

- 6.10 Adequate visibility splays are achieved in each direction of at least 2.4m x 43m in accordance with Table 7.1 of MfS1 based on a 'maximum' speed of 30mph for this road. The maximum required 43m is achievable subject to some minor trimming back of the hedges where they are overhanging the carriageway. Visibility in each direction from this access is shown in **Appendix C**.

- 6.11 The Sustainability Assessments stated under site 017 that being on the west side of Sugar Lane, the site has limited connections with neighbouring areas. Pedestrians would need to cross Sugar Lane in order to access the village centre. A dedicated pedestrian crossing could satisfactorily address this issue.

- 6.12 Therefore, as part of the development an informal pedestrian crossing is proposed from the site to the grass verge situated at the Sugar Lane junction with Jefferies. A footpath will be provided across the grass verge with appropriate tactile paving. There is an existing footway on the north side of Jefferies which provides a link to Lewes Road which leads to the centre of the village via footpaths.

- 6.13 The access location and design is shown in the drawing included in **Appendix B**. Visibility at the proposed access location on Sugar Lane is also shown in **Appendix B**.

Car Parking

- 6.14 On-site parking will be laid out in accordance with West Sussex County Council's 'Guidance for Car Parking in New Residential Developments' and the WSCC car parking demand calculator. The calculation tool gives the appropriate level of parking provision with regards to the ward and district within West Sussex, the number of bedrooms and habitable rooms per unit, and should be used as a guide. See **Table 6.1** below.

Table 6.1 – WSCC Car Parking Demand Calculator

DEVELOPMENT MIX				PARKING DEMAND					TOTAL
Unit Type	Unit Tenure	Habitable Rooms	No. of Units	Allocated No. of Spaces	Unallocated for Residents		Unallocated for Visitors		
					Per Unit	Total	Per Unit	Total	
Houses	Private	2	4	4	0	1	0	1	6
Houses	Private	4	16	32	0	1	0	2	36
Houses	Private	5	17	34	0	3	0	3	40
Houses	Private	6	5	10	0	1	0	1	12
Total			42	80		6.09		8.40	94

The results from the WSCC car parking demand calculator suggest that there will be a total demand for a provision of 94 car parking spaces as part of the development. The parking spaces are to be allocated as follows:

- 6.15 Therefore, in accordance with the requirements outlined above, a total of 80 spaces will be provided for all residents of the 42 units. To meet the above requirement a total of 14 unallocated spaces for use by residents and visitors will be provided on site. The layout plans are included in **Appendix B**

Cycle Parking

- 6.16 Covered and secure cycle parking to meet the West Sussex County Council's standards will be provided for each unit. The WSCC 'Guidance on Parking in New Residential Development' document states the following standards:

- 1No & 2No bedroom houses 1 space (per dwelling)
- 3No+ bedroom houses 2 spaces (per dwelling)
- 1No & 2No bedroom flats 1 space (per unit)

- 6.17 These will be provided within garages or sheds for each dwelling.

Servicing and Emergency Vehicle Access

- 6.18 All bins will be provided in the front garden of each residential dwelling and within a communal bins store for the block of flats. The location of the bin stores is designed in accordance with Manual for Streets (MfS) standards which states within paragraph 6.8.9 that *'residents should not be required to carry waste more than 30m to the storage point' and 'waste collection vehicles should be able to get within 25m of the storage point and the gradient between the two should not exceed 1:12'*.
- 6.19 Refuse vehicles will enter the site from Sugar Lane via the proposed access. The proposed access road will be laid out so that emergency and refuse vehicles can enter and turn on site within the proposed turning head and exit the site in forward gear. This is in line with the requirements set out for emergency vehicles in paragraph 6.7.2 and 6.7.3 of Manual for Streets, i.e. *'there should be vehicle access for a pump appliance within 45m of all dwelling entrances'*.

7 Development Impact

General

- 7.1 Using the TRICS database, the likely trip generations of the proposed development are set out in **Tables 7.1** and **7.2**. The development is likely to have a high element of car use, with walk being the dominant sustainable mode.

Proposed Traffic Generation – TRICS Analysis

- 7.2 Likely trip rates for a development of this scale in this type of location are set out in **Table 4** below based on an interrogation of the detailed TRICS database for private flats, private houses community centres in edge of town locations in England excluding London. Full TRICS outputs are at **Appendix C**.
- 7.3 To provide the most robust assessment, the analysis is based on private houses and takes no account of any proportion of affordable housing.

Table 7.1 - Trip Rates (per 1 unit)

Vehicle Trip Rates	AM Peak Hour (0800-0900)			PM Peak Hour (1700-1800)		
	In	Out	2-Way	In	Out	2-Way
'Privately Owned Houses'	0.096	0.322	0.418	0.308	0.111	0.419
Community Building	0.202	0.000	0.202	0.506	0.574	1.080

- 7.4 Resultant trips to and from the proposed 42 dwellings and the approximate 200sqm community pavilion are shown in **Table 7.2** below.

Table 7.2 – Vehicle Trips (per 42 units)

Vehicle Trips	AM Peak Hour (0800-0900)			PM Peak Hour (1700-1800)		
	In	Out	2-Way	In	Out	2-Way
'Privately Owned Houses' (42)	4	14	18	13	5	18
Community Building (200m ²)	0.404	0.000	0.404	1.012	1.148	2

- 7.5 The detailed TRICS data for the proposed site is included in **Appendix C**.

7.6 Using the information from the TRICS database, the proposed development is likely to lead to:

- Around 18 additional two-way trips in the AM peak period (0800-0900);
- Around 18 additional two-way trips in the PM peak period (1700-1800);

7.7 Although the development will generate some vehicle trips during the AM and PM peak periods, this would not have a negative material impact on the local highway network and can be readily accommodated. Sugar Lane is already lightly trafficked and therefore the development will result in a very minor impact on the local road network.

8 Recommended Access Strategy

Vehicular Access

- 8.1 Sugar Lane is the recommended access location to serve the site. The existing road is relatively straight with good visibility in both directions. The access will be laid out to meet West Sussex County Council and Manual for Streets standards.
- 8.2 A 4.8m wide bellmouth access laid out to WSCC and MfS standards would be acceptable as outlined in **Section 4**. The required visibility splays would be 2.4m x 43m based on the 30mph speed limit. These visibility splays have been shown on the access plan in **Appendix B**.

Access Visibility Standards

- 8.3 Manual for Streets is considered to be the appropriate guidance for determining visibility requirements on this type of road. MfS 1 was introduced in 2007. It is a guide to the layout and design of largely residential roads. In accordance with Section 7 'Street Geometry' Table 7.1 provides the following visibility splay requirements for roads with speeds of up to 37mph in **Table 8.3**.

Table 8.3 – Visibility Splay requirements from Manual for Streets 1

Speed in kph	16	24	32	40	45	48	50	60
Speed in mph	10	15	20	25	28	30	31	37
SSD in metres	11	17	25	33	39	43	45	59

- 8.4 The lower visibility splay requirements in Manual for Streets were based on research including updated driver reaction times and taking account of modern vehicles which can stop quicker than those used in older research.
- 8.5 Manual for Streets 2 developed this research with many case studies to show that there was no clear correlation between accidents and lower visibility splays.
- 8.6 MfS1 determines the Y distance visibility splay requirements for roads with speeds up to 37mph. It also confirms, in paragraph 7.7.6, that a distance of 2.4m is the appropriate X distance for most roads. However, the absolute minimum X distance of 2m is acceptable where roads are lightly trafficked.
- 8.7 Manual for Streets 1 (MfS1) is considered to be the appropriate guidance for determining visibility splay requirements for the types of road in the village of Horsted Keynes which is largely subject to

a 30mph speed restriction. Where actual speed of traffic is higher (i.e. Keysford Lane) then greater splays will be considered.

Pedestrian Access

- 8.8 In the Sustainability Assessments of the site it was noted that the site does not have very good access to the village centre via safe footpaths, and therefore, a dedicated pedestrian crossing should be put in place crossing Sugar Lane to address this issue.
- 8.9 Therefore, as part of the development an informal pedestrian crossover will be formed providing a safe crossing point from the site access to the grass verge situated at the Sugar Lane junction with Lewes Road. A footpath will be provided across the grass verge. This will provide a footway link to an existing footway on the eastern side of Lewes Road leading to the centre of the village via safe footpaths.
- 8.10 The access and crossing will be designed to comply with WSCC and MfS standards.

9 Travel Plan Welcome Pack

- 9.1 The WSCC Transport Assessment Guidance refers to the DfT Guidance on Transport Assessments which provides indicative thresholds for Transport Statements, Transport Assessments and Travel Plans.
- 9.2 Travel Plans are usually secured by a Condition of Planning Permission, however, the DfT guidance states for a residential development of this size (42 dwellings) no Transport Assessment or Travel Plan is required.
- 9.3 A Travel Plan Welcome Pack may be required for distribution amongst future residents on occupation of the development to encourage more sustainable modes of transport. This Welcome Pack would include the following:
- Benefits of a Travel Plan;
 - Local footways;
 - Local cycle routes;
 - Local bus stops / bus services and route maps;
 - Links to helpful journey planning or car sharing websites etc.

10 Conclusion

- 10.1 This Transport Statement has been prepared to support a planning application for a new access to serve a development of 42 dwellings on the land at Jeffrey's Farm in Horsted Keynes.
- 10.2 Appropriate access via Sugar Lane can be achieved within the current land ownership to serve the site.
- 10.3 The observed traffic flows along both Keysford Lane, and Sugar Lane are all light with plenty of spare capacity including at peak periods of the day.
- 10.4 The proposed development is likely to generate around 18 additional two-way vehicle trips in both the AM peak hour (0800-0900) and PM peak hours (1700-1800). These can be easily accommodated on the highway network with no material impact.
- 10.5 The site is located within walking distance of the village centre shops and services. To improve pedestrian access, an informal crossing point is proposed with dropped kerbs and tactile paving across Sugar Lane.
- 10.6 A footpath will be provided across the grass verge at the Sugar Lane junction with Jefferies. A dropped kerb crossing will be provided in Jefferies to connect to the existing footpath along the north side of Jefferies which provides a footway link to Lewes Road. The footway along the eastern side of Lewes Road provides a footway link leading to the centre of the village. The access and footway improvements have been the subject of a Stage 1 Road Safety Audit and Designer's Response.
- 10.7 Refuse and emergency vehicles will enter the site from Sugar Lane via the proposed access. The proposed access road will be laid out so that emergency and refuse vehicles can enter and turn on site within the proposed turning head and exit the site in forward gear.
- 10.8 Travel Plans are usually secured by a Condition of Planning Permission, however, a development of this size may only require a Travel Plan Welcome Pack for distribution amongst the future residents of the development. This would outline local footways, cycle routes and bus stops and bus services etc. to encourage the use of sustainable transport modes.
- 10.9 This report concludes there are no unacceptable highway or transport implications arising from the proposed development to construct a new access to serve 42No dwelling and a community building within the village of Horsted Keynes.

- End of Report -

Appendix A

Site Location Map

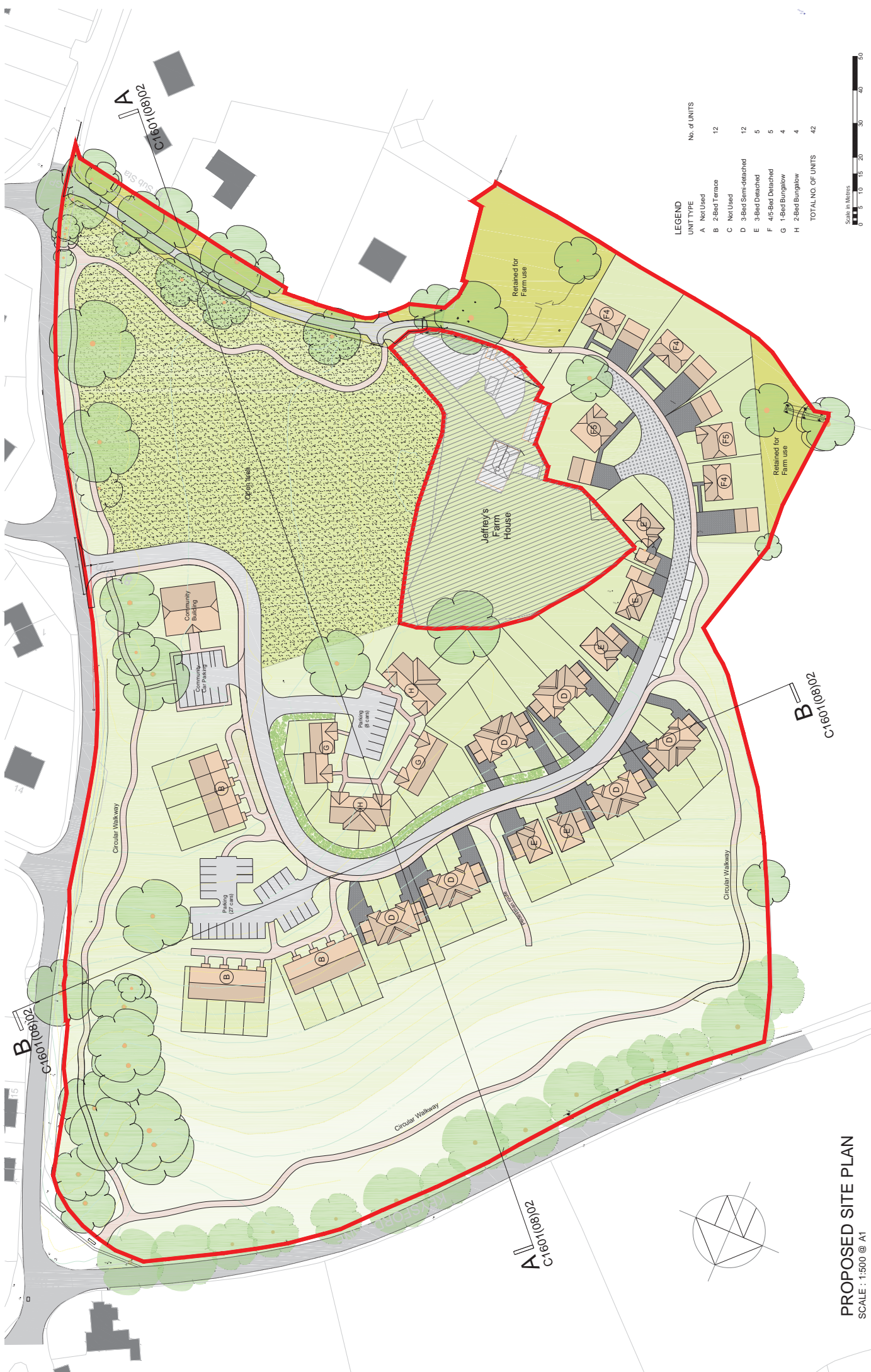


Site Allocation Map (HKNP)



Appendix B

Development Proposals



LEGEND	
UNIT TYPE	No. of UNITS
A Not Used	12
B 2-Bed Terrace	
C Not Used	
D 3-Bed Semi-detached	12
E 3-Bed Detached	5
F 4/5-Bed Detached	5
G 1-Bed Bungalow	4
H 2-Bed Bungalow	4
TOTAL NO. OF UNITS	
42	



PROPOSED SITE PLAN
SCALE : 1:500 @ A1

<div>CROWTHER ASSOCIATES</div> <div>CROWTHER ASSOCIATES ARCHITECTS LLP</div> <div>15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000</div>	DRAWING							
	Proposed Site Plan							
	CLIENT	The Griffiths Family Trust	JOB NO.	C-1601	DRAWING NO.	(08)01	REV.	A
	PROJECT	Proposed site layout for a housing scheme at Jeffrey's Farm, Horsted Keynes						
		SCALE	1:500 @A1		DATE	August 2016		
						DRAWN	SR	

Appendix C

TRICS Analysis

Calculation Reference: AUDIT-349901-160815-0813

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

VEHICLESSelected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	1 days
	HC HAMPSHIRE	1 days
03	SOUTH WEST	
	SM SOMERSET	1 days
04	EAST ANGLIA	
	NF NORFOLK	2 days
	SF SUFFOLK	1 days
05	EAST MIDLANDS	
	LN LINCOLNSHIRE	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
	ST STAFFORDSHIRE	1 days
	WK WARWICKSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Filtering Stage 2 selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 6 to 37 (units:)
 Range Selected by User: 6 to 40 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 12/11/15

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday	3 days
Wednesday	2 days
Thursday	3 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	10 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	6
Edge of Town	4

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	10
------------------	----

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out

Filtering Stage 3 selection:Use Class:

C3	10 days
----	---------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,001 to 5,000	1 days
5,001 to 10,000	2 days
10,001 to 15,000	3 days
20,001 to 25,000	3 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

25,001 to 50,000	2 days
50,001 to 75,000	2 days
75,001 to 100,000	4 days
125,001 to 250,000	1 days
250,001 to 500,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	5 days
1.1 to 1.5	5 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	1 days
No	9 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

LIST OF SITES relevant to selection parameters

1	ES-03-A-02	PRIVATE HOUSING	EAST SUSSEX
	SOUTH COAST ROAD		
	PEACEHAVEN		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	37	
	Survey date: FRIDAY	18/11/11	Survey Type: MANUAL
2	HC-03-A-17	HOUSES & FLATS	HAMPSHIRE
	CANADA WAY		
	LIPHOOK		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	36	
	Survey date: THURSDAY	12/11/15	Survey Type: MANUAL
3	LN-03-A-03	SEMI DETACHED	LINCOLNSHIRE
	ROOKERY LANE		
	BOULTHAM		
	LINCOLN		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	22	
	Survey date: TUESDAY	18/09/12	Survey Type: MANUAL
4	NF-03-A-01	SEMI DET. & BUNGALOWS	NORFOLK
	YARMOUTH ROAD		
	CAISTER-ON-SEA		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	27	
	Survey date: TUESDAY	16/10/12	Survey Type: MANUAL
5	NF-03-A-03	DETACHED HOUSES	NORFOLK
	HALING WAY		
	THETFORD		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	10	
	Survey date: WEDNESDAY	16/09/15	Survey Type: MANUAL
6	SF-03-A-04	DETACHED & BUNGALOWS	SUFFOLK
	NORMANSTON DRIVE		
	LOWESTOFT		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	7	
	Survey date: TUESDAY	23/10/12	Survey Type: MANUAL
7	SH-03-A-06	BUNGALOWS	SHROPSHIRE
	ELLESMERE ROAD		
	SHREWSBURY		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	16	
	Survey date: THURSDAY	22/05/14	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

8	SM-03-A-01	DETACHED & SEMI	SOMERSET
	WEMBDON ROAD		
	NORTHFIELD		
	BRIDGWATER		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	33	
	Survey date: THURSDAY	24/09/15	Survey Type: MANUAL
9	ST-03-A-05	TERRACED & DETACHED	STAFFORDSHIRE
	WATERMEET GROVE		
	ETRURIA		
	STOKE-ON-TRENT		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	14	
	Survey date: WEDNESDAY	26/11/08	Survey Type: MANUAL
10	WK-03-A-01	TERRACED/SEMI/DET.	WARWICKSHIRE
	ARLINGTON AVENUE		
	LEAMINGTON SPA		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	6	
	Survey date: FRIDAY	21/10/11	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
CA-03-A-04	Anomalous Result
DV-03-A-01	Anomalous Result
SF-03-A-05	Anomalous Result
SH-03-A-03	Anomalous Result
WK-03-A-02	Anomalous Result

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	10	21	0.048	10	21	0.293	10	21	0.341
08:00 - 09:00	10	21	0.096	10	21	0.322	10	21	0.418
09:00 - 10:00	10	21	0.130	10	21	0.168	10	21	0.298
10:00 - 11:00	10	21	0.154	10	21	0.091	10	21	0.245
11:00 - 12:00	10	21	0.115	10	21	0.125	10	21	0.240
12:00 - 13:00	10	21	0.144	10	21	0.135	10	21	0.279
13:00 - 14:00	10	21	0.091	10	21	0.149	10	21	0.240
14:00 - 15:00	10	21	0.139	10	21	0.159	10	21	0.298
15:00 - 16:00	10	21	0.255	10	21	0.130	10	21	0.385
16:00 - 17:00	10	21	0.269	10	21	0.163	10	21	0.432
17:00 - 18:00	10	21	0.308	10	21	0.111	10	21	0.419
18:00 - 19:00	10	21	0.178	10	21	0.130	10	21	0.308
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.927			1.976			3.903

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

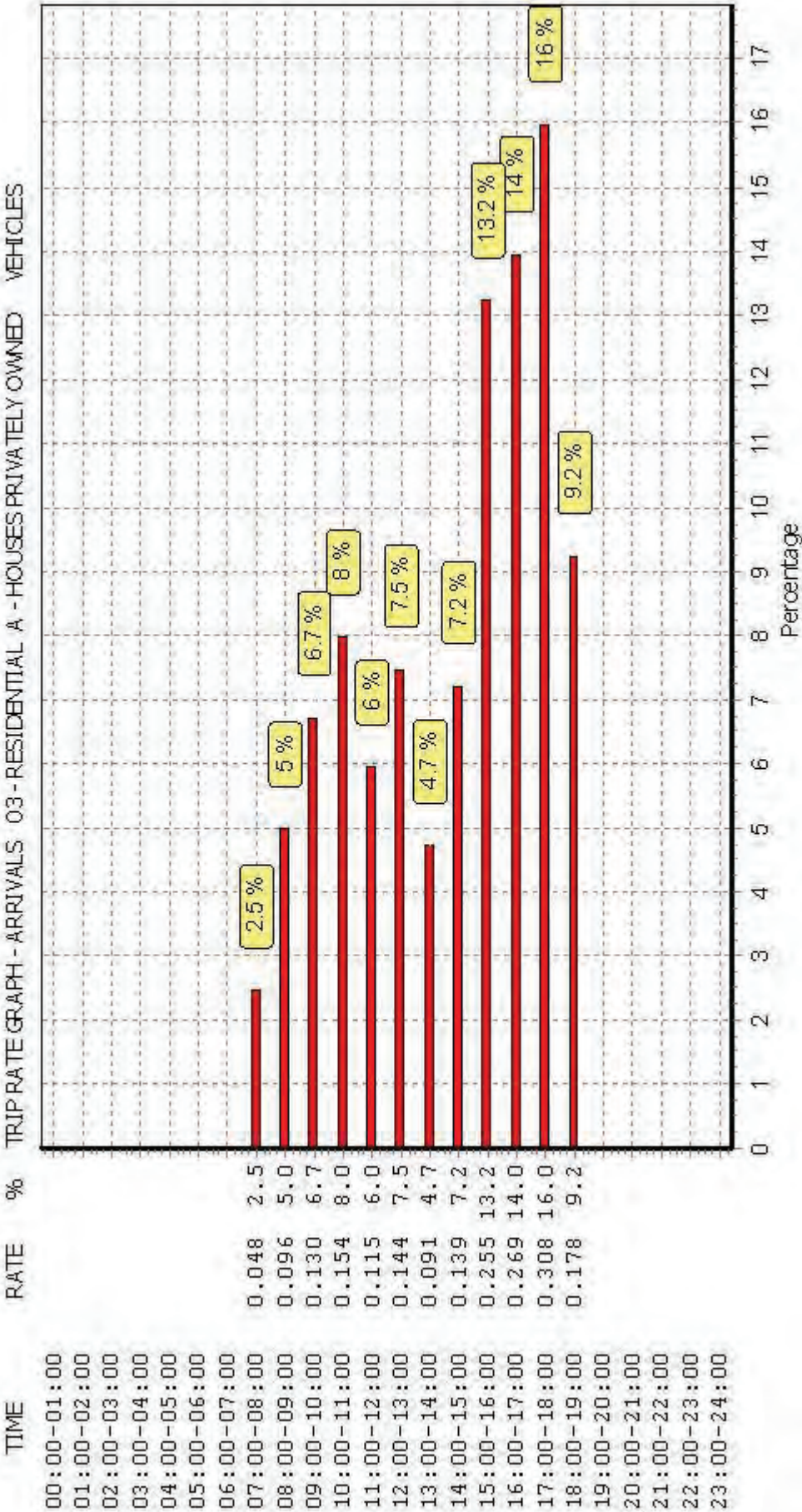
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected:	6 - 37 (units:)
Survey date date range:	01/01/08 - 12/11/15
Number of weekdays (Monday-Friday):	10
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	5

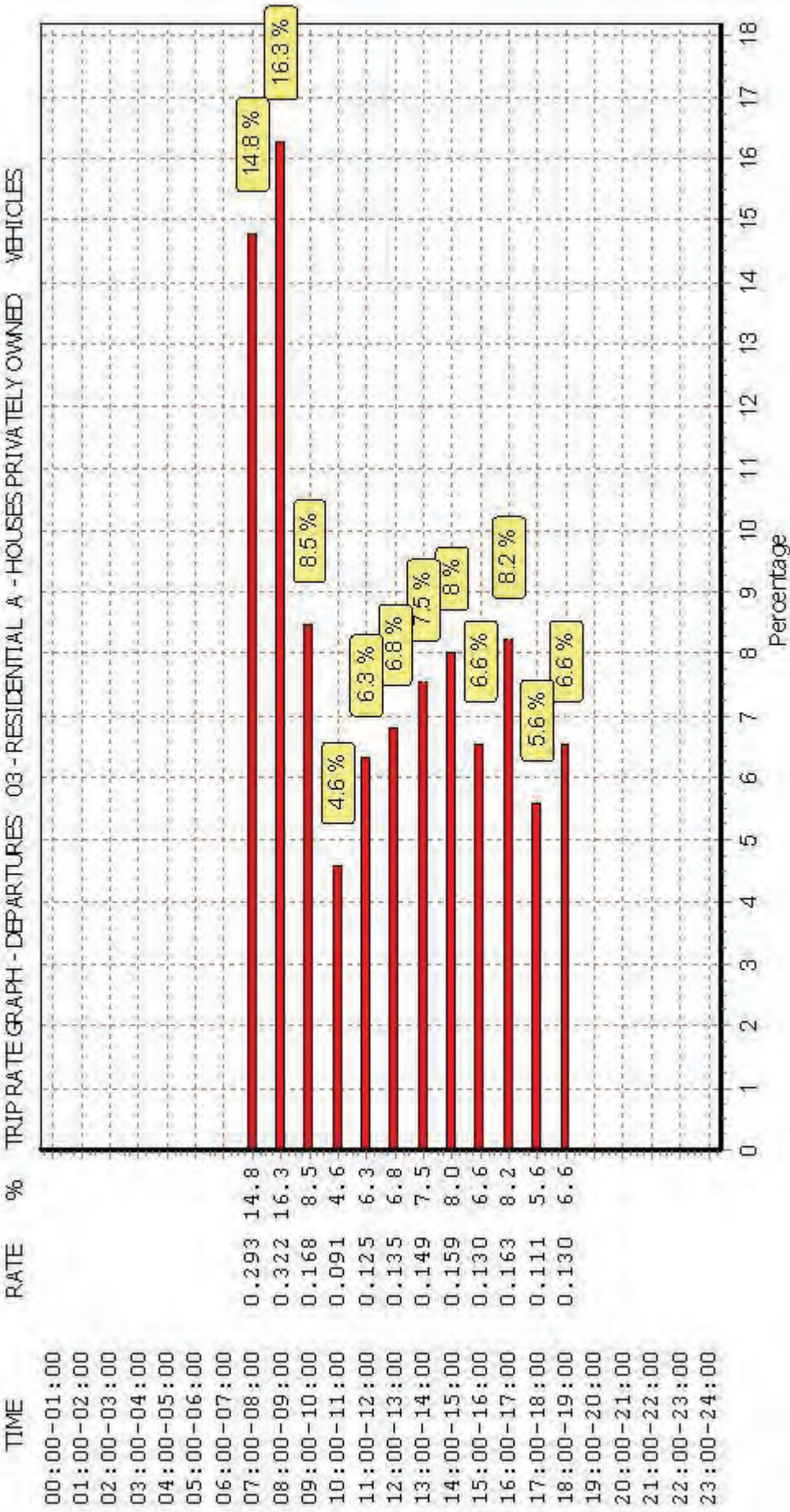
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



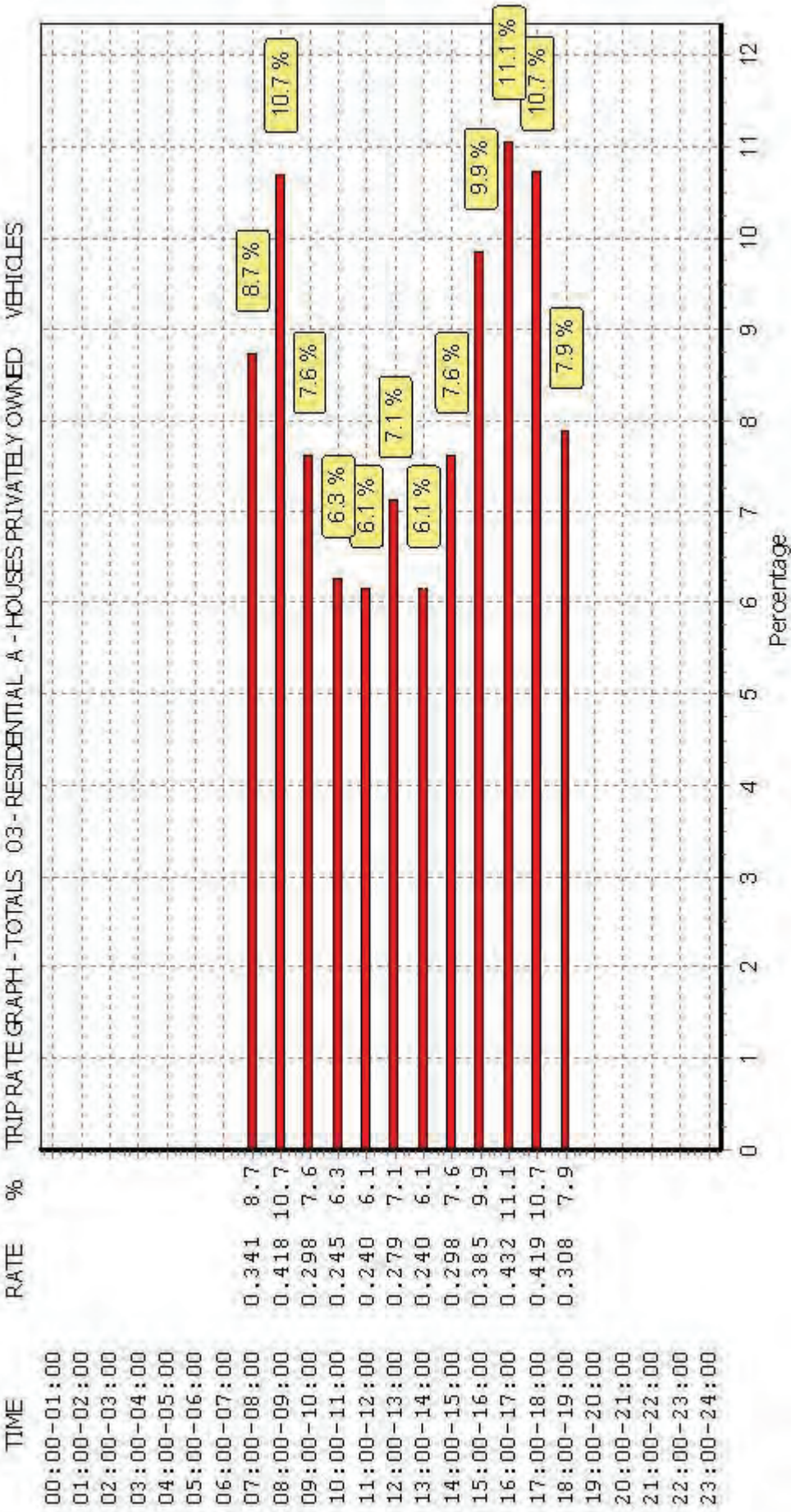
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

TAXIS**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	10	21	0.000	10	21	0.000	10	21	0.000
08:00 - 09:00	10	21	0.019	10	21	0.019	10	21	0.038
09:00 - 10:00	10	21	0.000	10	21	0.000	10	21	0.000
10:00 - 11:00	10	21	0.010	10	21	0.010	10	21	0.020
11:00 - 12:00	10	21	0.005	10	21	0.005	10	21	0.010
12:00 - 13:00	10	21	0.000	10	21	0.000	10	21	0.000
13:00 - 14:00	10	21	0.000	10	21	0.000	10	21	0.000
14:00 - 15:00	10	21	0.000	10	21	0.000	10	21	0.000
15:00 - 16:00	10	21	0.005	10	21	0.005	10	21	0.010
16:00 - 17:00	10	21	0.014	10	21	0.005	10	21	0.019
17:00 - 18:00	10	21	0.005	10	21	0.000	10	21	0.005
18:00 - 19:00	10	21	0.000	10	21	0.005	10	21	0.005
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.058			0.049			0.107

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

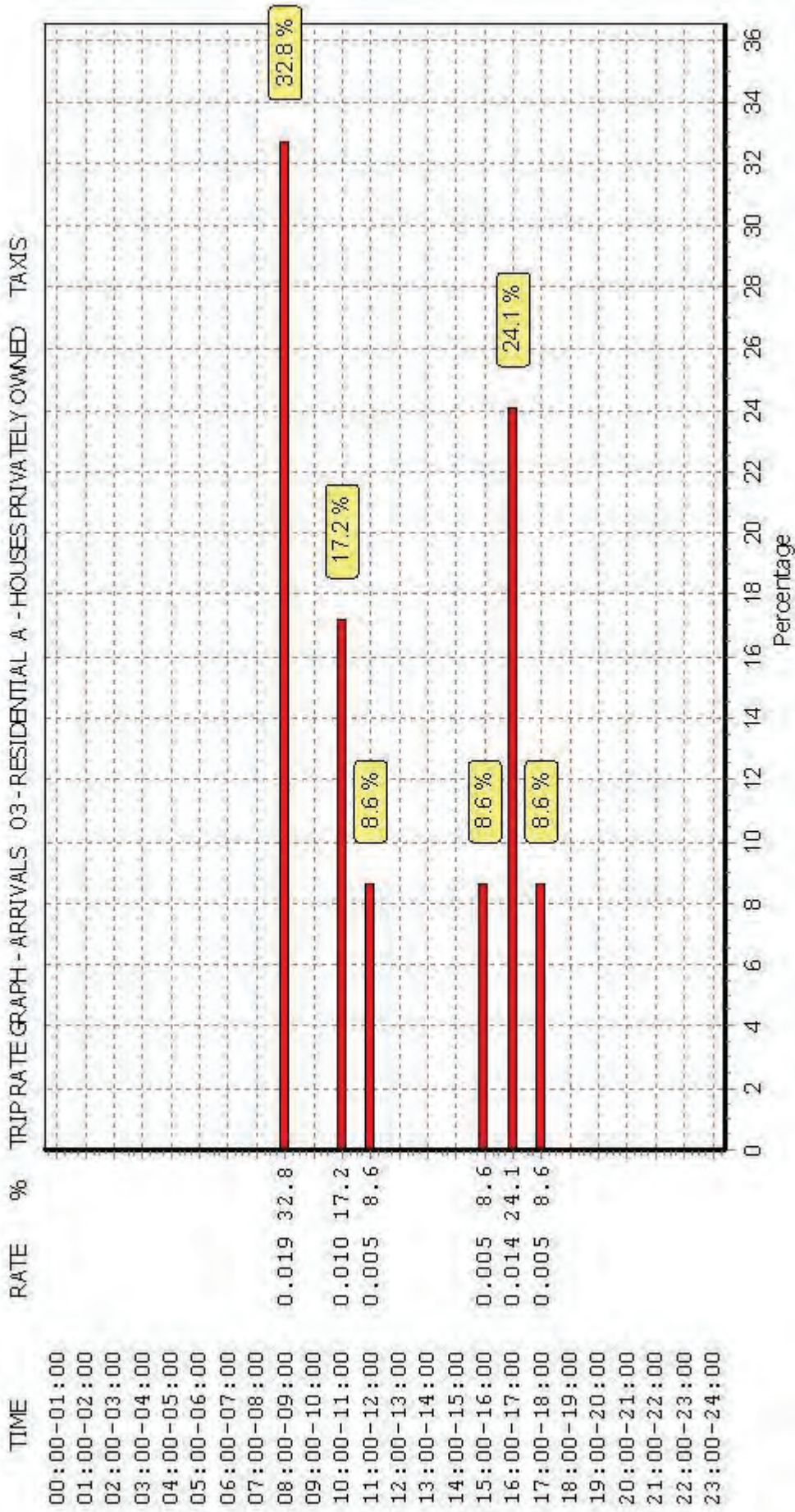
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected: 6 - 37 (units:)
 Survey date date range: 01/01/08 - 12/11/15
 Number of weekdays (Monday-Friday): 10
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 5

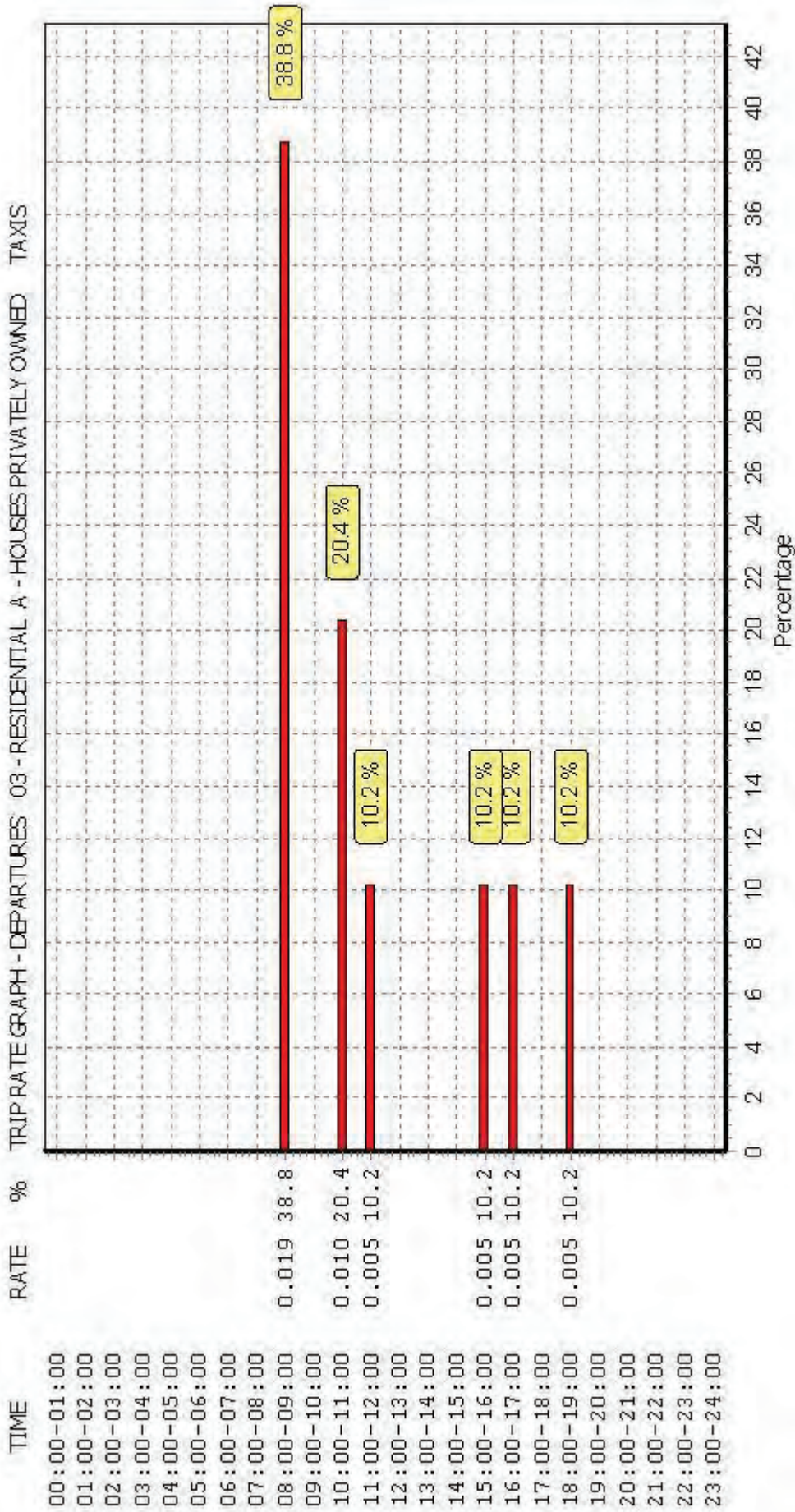
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



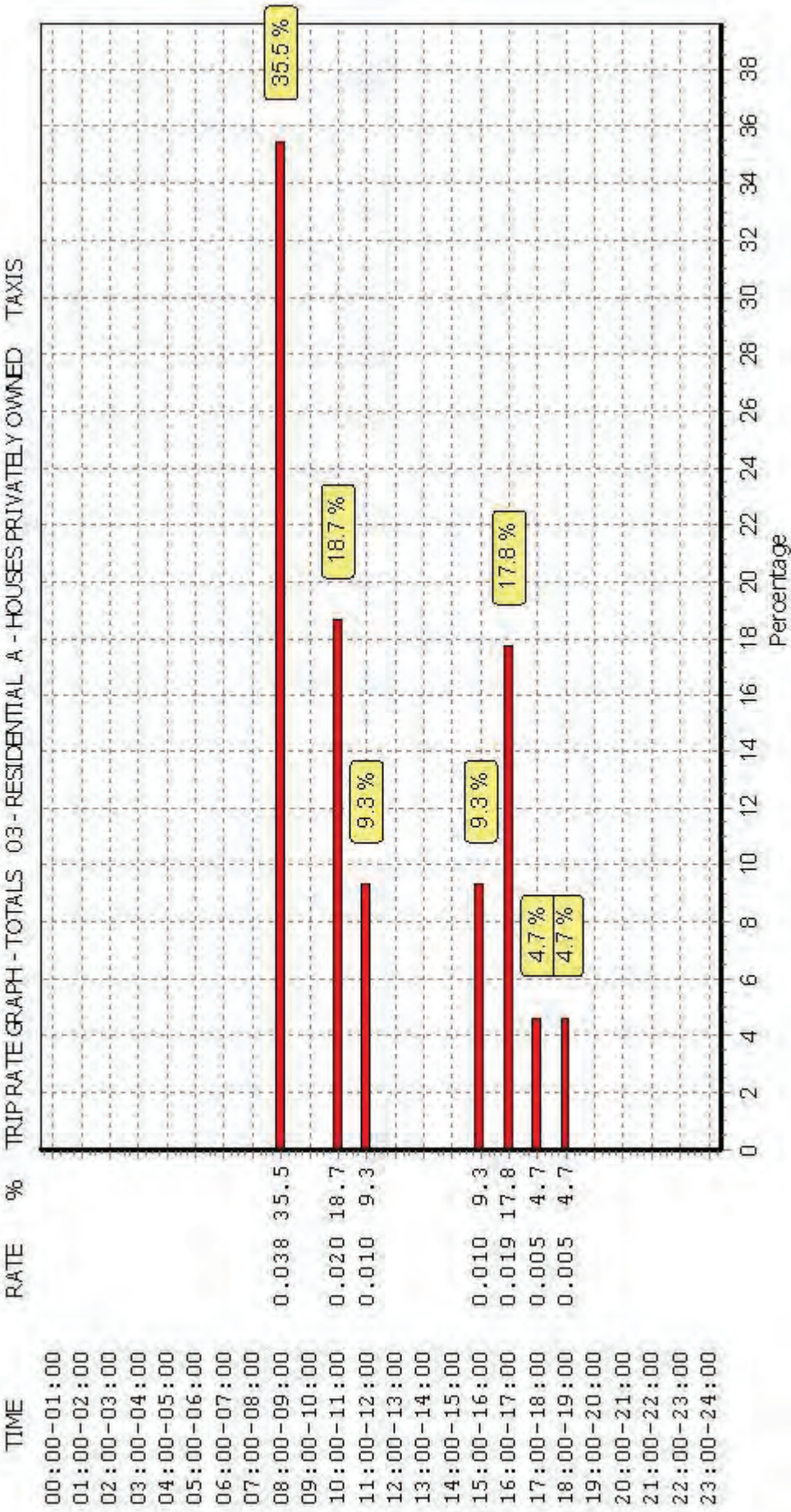
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

OGVS**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	10	21	0.000	10	21	0.000	10	21	0.000
08:00 - 09:00	10	21	0.005	10	21	0.005	10	21	0.010
09:00 - 10:00	10	21	0.005	10	21	0.005	10	21	0.010
10:00 - 11:00	10	21	0.014	10	21	0.005	10	21	0.019
11:00 - 12:00	10	21	0.005	10	21	0.014	10	21	0.019
12:00 - 13:00	10	21	0.010	10	21	0.005	10	21	0.015
13:00 - 14:00	10	21	0.000	10	21	0.000	10	21	0.000
14:00 - 15:00	10	21	0.005	10	21	0.005	10	21	0.010
15:00 - 16:00	10	21	0.000	10	21	0.000	10	21	0.000
16:00 - 17:00	10	21	0.005	10	21	0.005	10	21	0.010
17:00 - 18:00	10	21	0.005	10	21	0.005	10	21	0.010
18:00 - 19:00	10	21	0.000	10	21	0.000	10	21	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.054			0.049			0.103

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

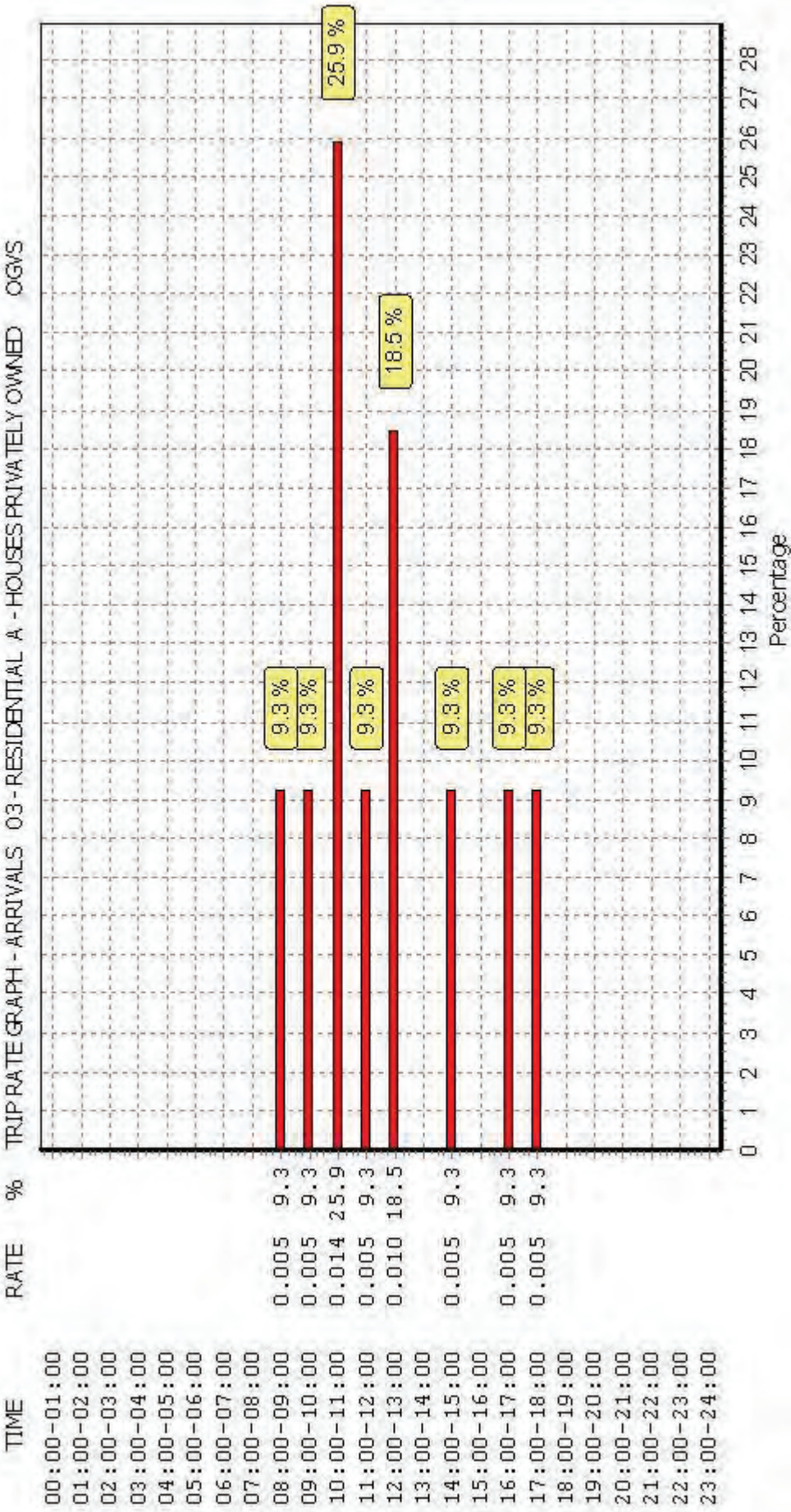
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected:	6 - 37 (units:)
Survey date date range:	01/01/08 - 12/11/15
Number of weekdays (Monday-Friday):	10
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	5

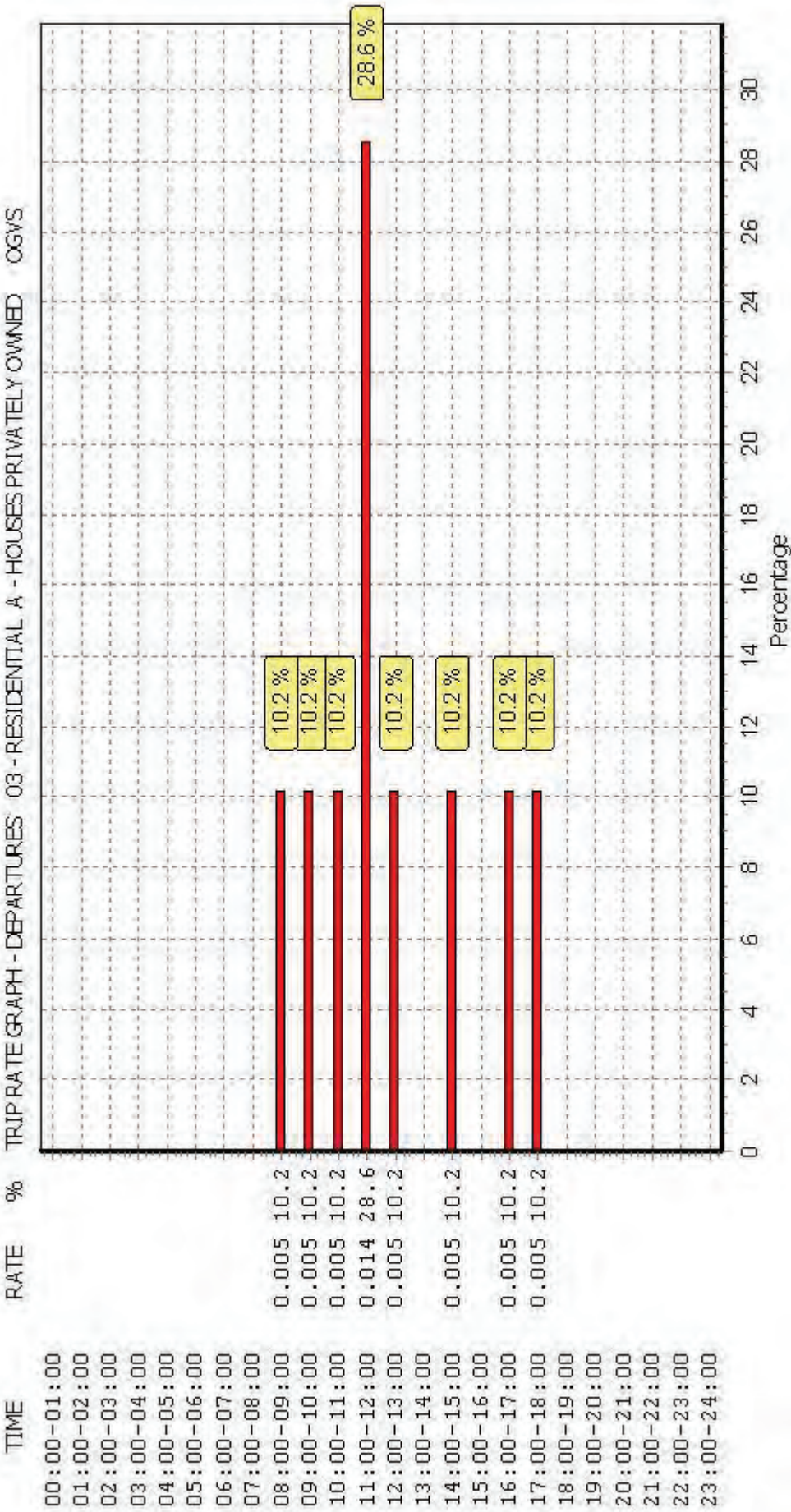
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



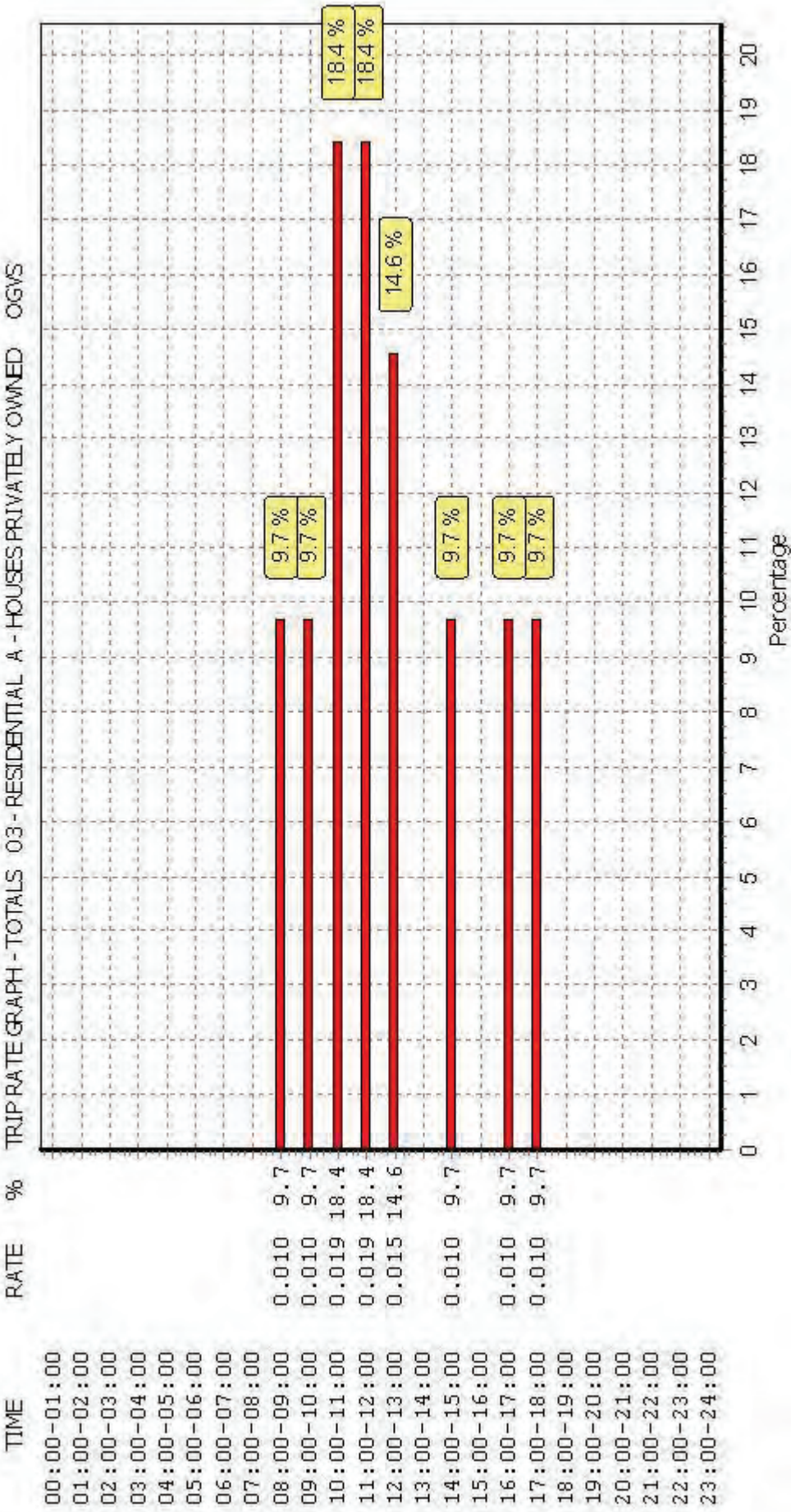
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

PSVS**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	10	21	0.000	10	21	0.000	10	21	0.000
08:00 - 09:00	10	21	0.000	10	21	0.000	10	21	0.000
09:00 - 10:00	10	21	0.000	10	21	0.000	10	21	0.000
10:00 - 11:00	10	21	0.000	10	21	0.000	10	21	0.000
11:00 - 12:00	10	21	0.000	10	21	0.000	10	21	0.000
12:00 - 13:00	10	21	0.000	10	21	0.000	10	21	0.000
13:00 - 14:00	10	21	0.000	10	21	0.000	10	21	0.000
14:00 - 15:00	10	21	0.000	10	21	0.000	10	21	0.000
15:00 - 16:00	10	21	0.000	10	21	0.000	10	21	0.000
16:00 - 17:00	10	21	0.000	10	21	0.000	10	21	0.000
17:00 - 18:00	10	21	0.000	10	21	0.000	10	21	0.000
18:00 - 19:00	10	21	0.000	10	21	0.000	10	21	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

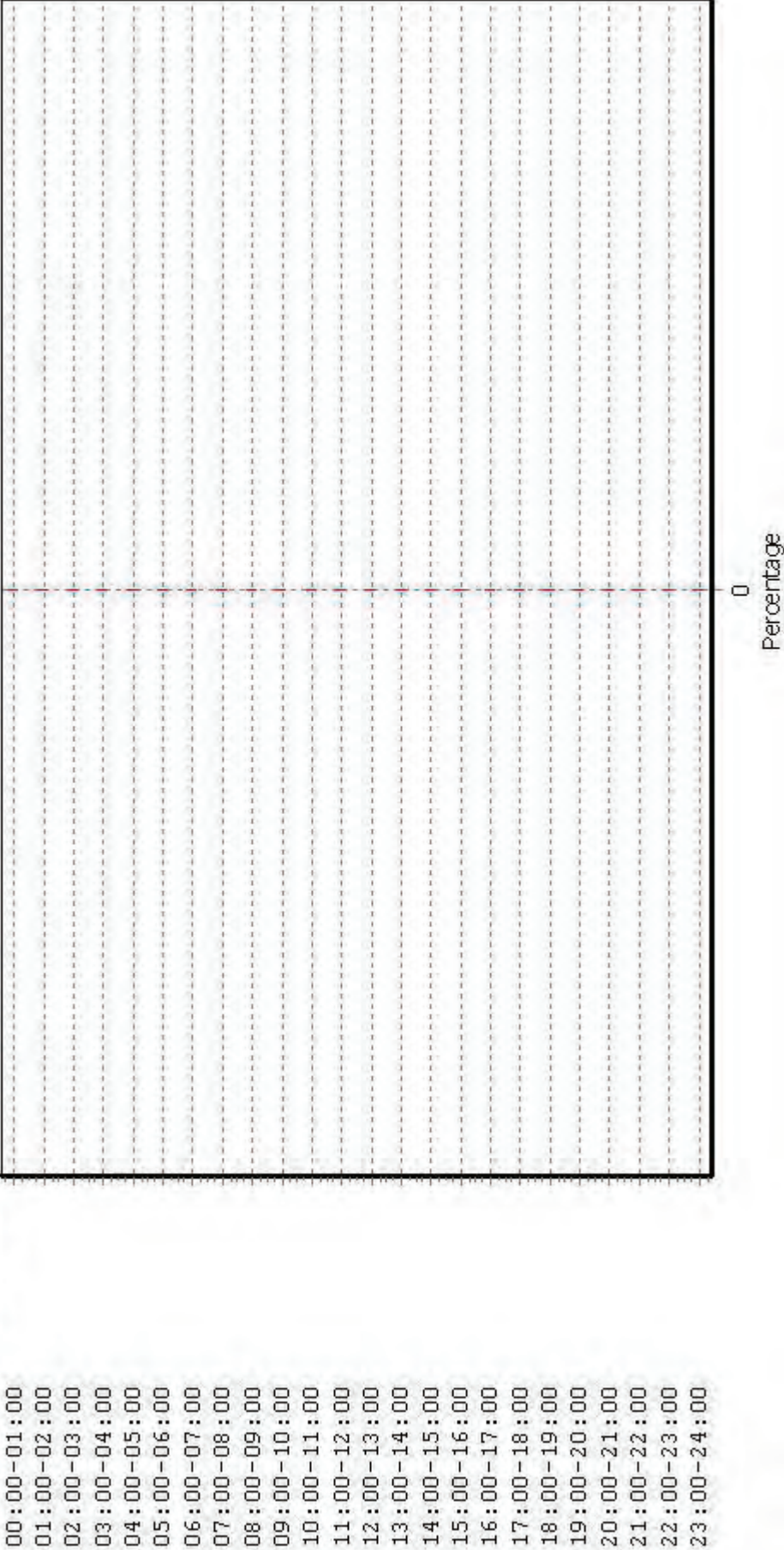
Parameter summary

Trip rate parameter range selected: 6 - 37 (units:)
 Survey date date range: 01/01/08 - 12/11/15
 Number of weekdays (Monday-Friday): 10
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 5

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901

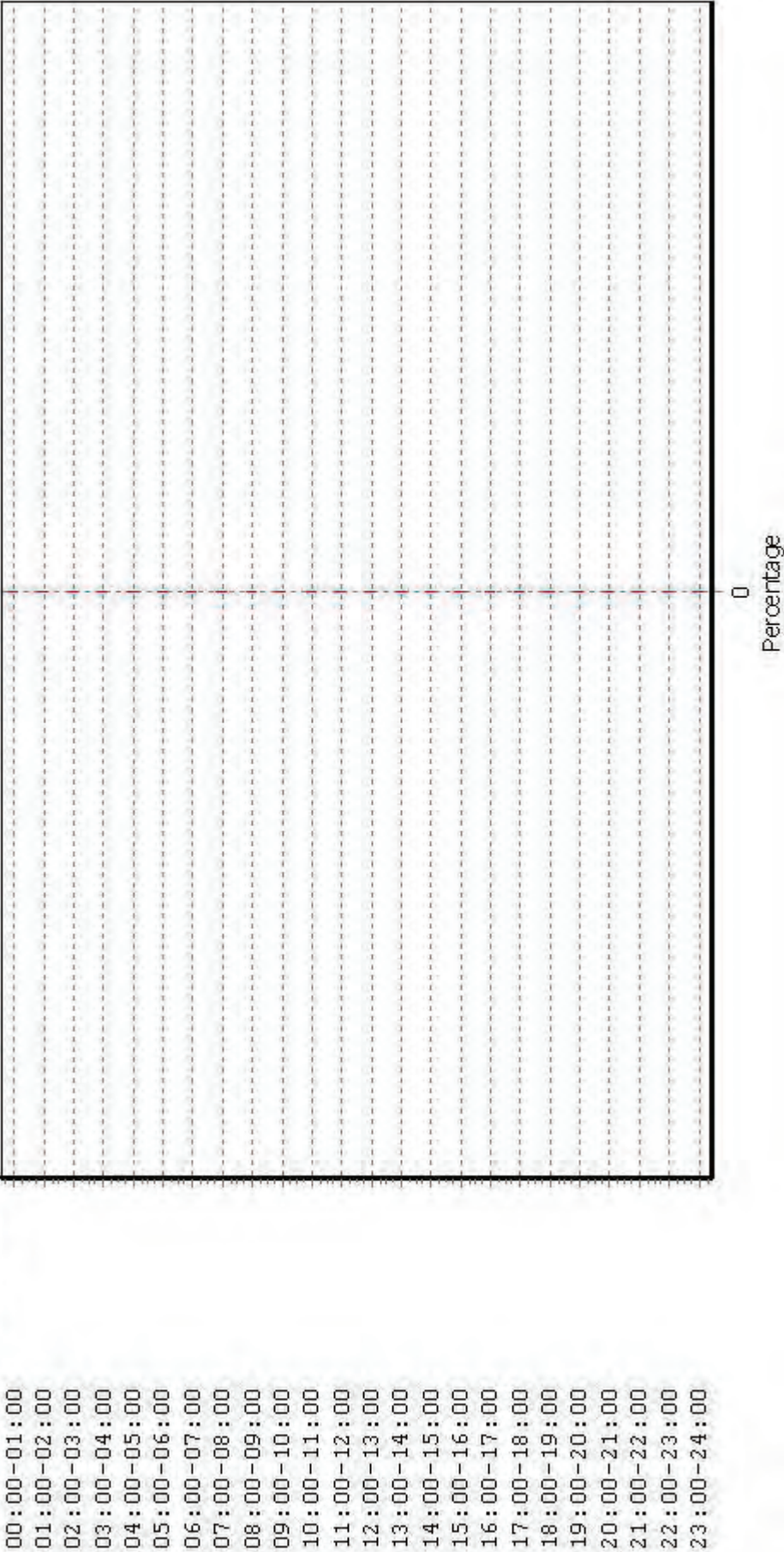
TRIP RATE GRAPH - ARRIVALS 03 - RESIDENTIAL A - HOUSES PRIVATELY OWNED PSVS



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901

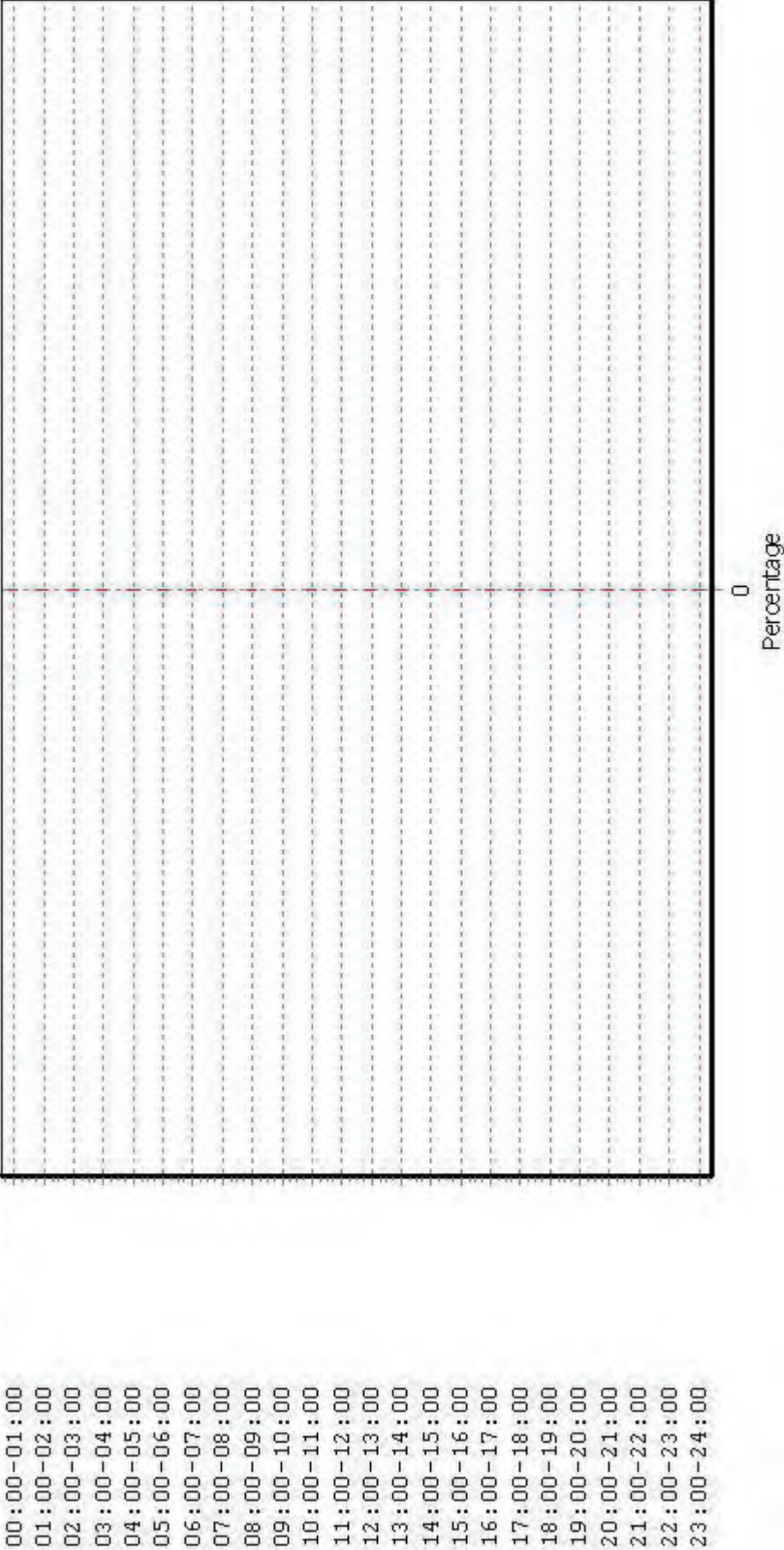
TRIP RATE GRAPH - DEPARTURES 03 - RESIDENTIAL A - HOUSES PRIVATELY OWNED PSVS



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901

TRIP RATE GRAPH - TOTALS 03 - RESIDENTIAL A - HOUSES PRIVATELY OWNED PSVS



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

CYCLISTS**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	10	21	0.005	10	21	0.024	10	21	0.029
08:00 - 09:00	10	21	0.000	10	21	0.019	10	21	0.019
09:00 - 10:00	10	21	0.000	10	21	0.010	10	21	0.010
10:00 - 11:00	10	21	0.005	10	21	0.014	10	21	0.019
11:00 - 12:00	10	21	0.005	10	21	0.000	10	21	0.005
12:00 - 13:00	10	21	0.005	10	21	0.005	10	21	0.010
13:00 - 14:00	10	21	0.005	10	21	0.005	10	21	0.010
14:00 - 15:00	10	21	0.005	10	21	0.005	10	21	0.010
15:00 - 16:00	10	21	0.010	10	21	0.000	10	21	0.010
16:00 - 17:00	10	21	0.010	10	21	0.000	10	21	0.010
17:00 - 18:00	10	21	0.034	10	21	0.010	10	21	0.044
18:00 - 19:00	10	21	0.010	10	21	0.000	10	21	0.010
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.094			0.092			0.186

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

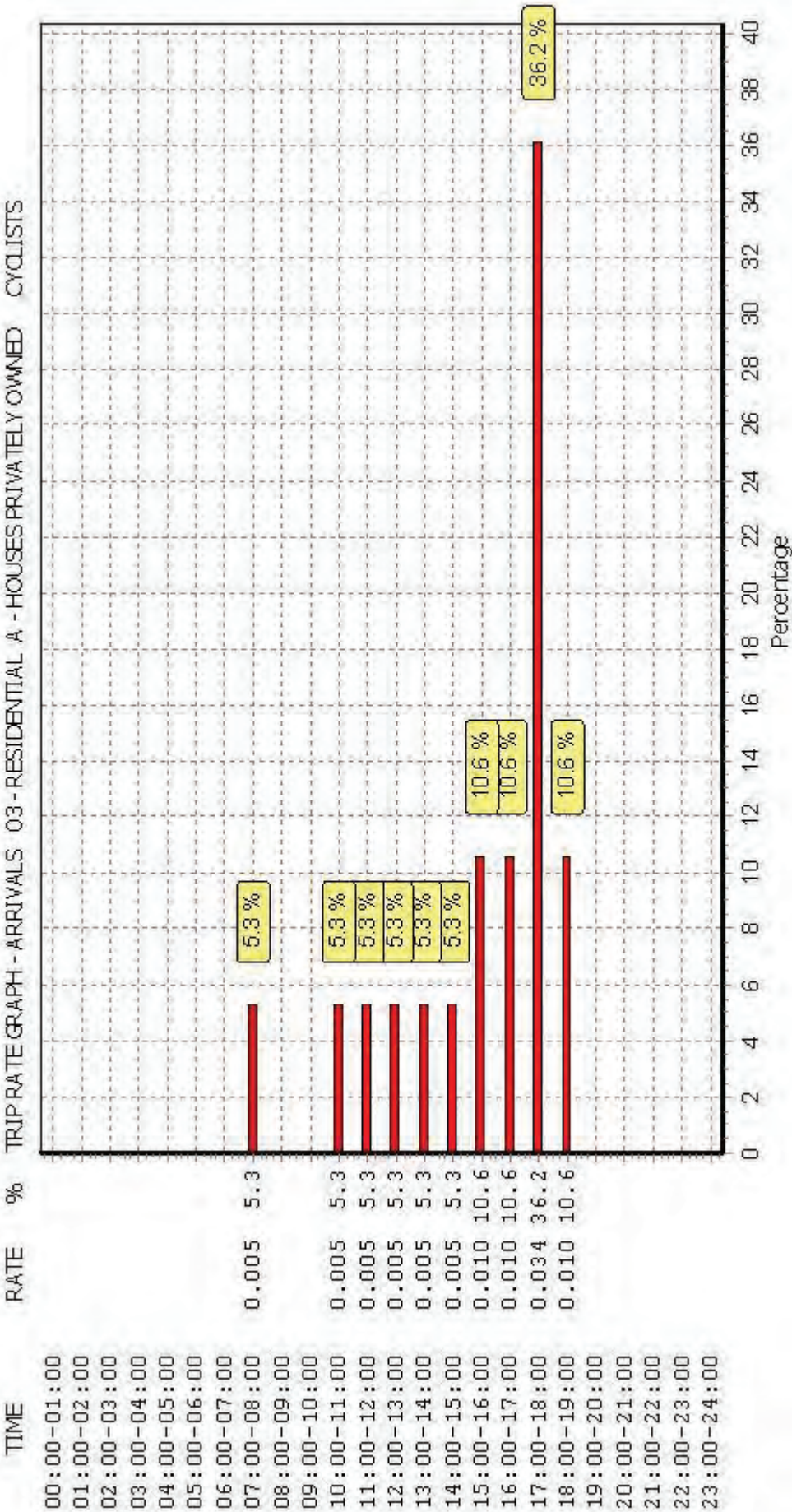
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected: 6 - 37 (units:)
 Survey date date range: 01/01/08 - 12/11/15
 Number of weekdays (Monday-Friday): 10
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 5

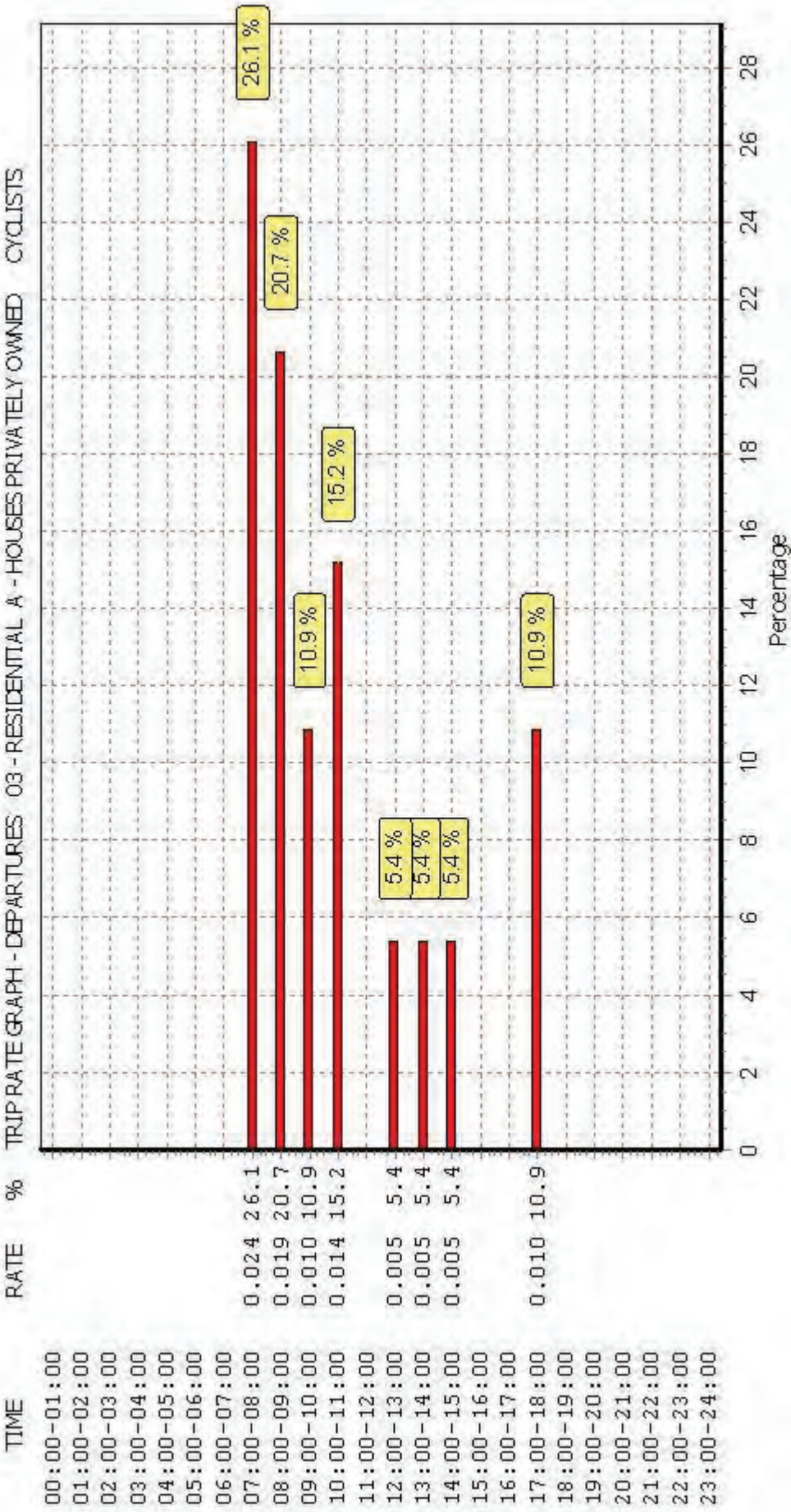
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



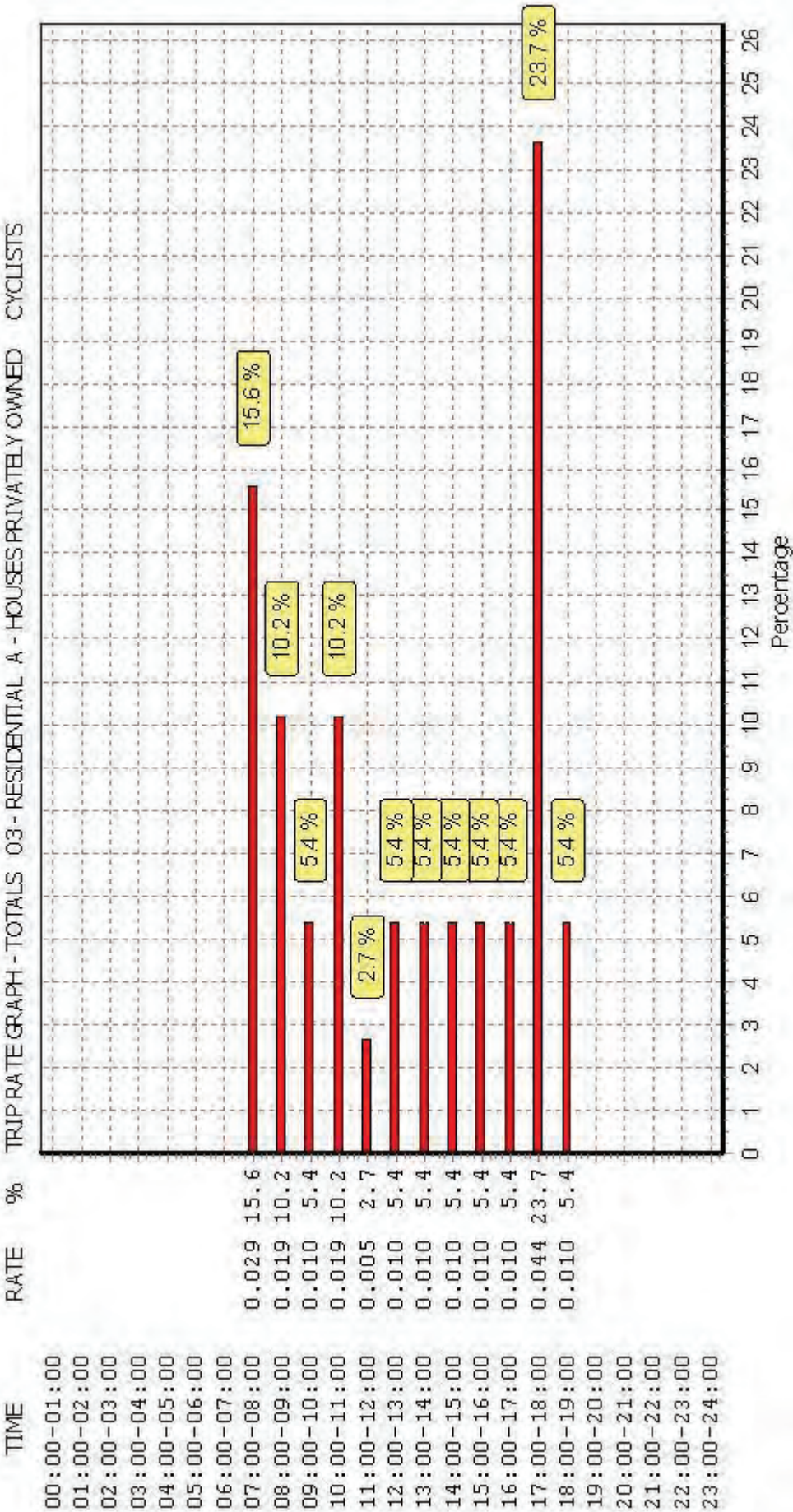
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

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This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 07 - LEISURE
 Category : Q - COMMUNITY CENTRE
VEHICLES

Selected regions and areas:

02 SOUTH EAST	
EX ESSEX	1 days
03 SOUTH WEST	
BA BATH & NORTH EAST SOMERSET	1 days
WL WILTSHIRE	1 days
04 EAST ANGLIA	
CA CAMBRIDGESHIRE	1 days
06 WEST MIDLANDS	
SH SHROPSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Filtering Stage 2 selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
 Actual Range: 210 to 1486 (units: sqm)
 Range Selected by User: 210 to 1500 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/06 to 24/10/13

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Tuesday	1 days
Thursday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	5 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	1
Edge of Town	1
Neighbourhood Centre (PPS6 Local Centre)	2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	4
Village	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Filtering Stage 3 selection:Use Class:

D2

5 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

5,001 to 10,000

3 days

20,001 to 25,000

1 days

25,001 to 50,000

1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000

1 days

75,001 to 100,000

1 days

100,001 to 125,000

2 days

250,001 to 500,000

1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0

1 days

1.1 to 1.5

3 days

1.6 to 2.0

1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No

5 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

LIST OF SITES relevant to selection parameters

1	BA-07-Q-02	COMMUNITY CENTRE	BATH & NORTH EAST SOMERSET
	OFF THE A36		
	BATH		
	Edge of Town Centre		
	Residential Zone		
	Total Gross floor area:	415 sqm	
	Survey date: MONDAY	02/10/06	Survey Type: MANUAL
2	CA-07-Q-01	COMMUNITY CENTRE	CAMBRIDGESHIRE
	HIGH STREET		
	COTTENHAM		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total Gross floor area:	500 sqm	
	Survey date: MONDAY	15/10/12	Survey Type: MANUAL
3	EX-07-Q-01	COMMUNITY CENTRE	ESSEX
	BORDERS LANE		
	LOUGHTON		
	Neighbourhood Centre (PPS6 Local Centre)		
	Residential Zone		
	Total Gross floor area:	352 sqm	
	Survey date: THURSDAY	22/11/07	Survey Type: MANUAL
4	SH-07-Q-01	COMMUNITY CENTRE	SHROPSHIRE
	SOUTHGATE		
	SUTTON HILL		
	TELFORD		
	Edge of Town		
	Residential Zone		
	Total Gross floor area:	1486 sqm	
	Survey date: THURSDAY	24/10/13	Survey Type: MANUAL
5	WL-07-Q-01	COM.CENTRE	WILTSHIRE
	OLD COURT		
	WOOTTON BASSETT		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Gross floor area:	210 sqm	
	Survey date: TUESDAY	03/10/06	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 07 - LEISURE/Q - COMMUNITY CENTRE

VEHICLES**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00	5	593	0.202	5	593	0.000	5	593	0.202
09:00 - 10:00	5	593	0.945	5	593	0.371	5	593	1.316
10:00 - 11:00	5	593	0.439	5	593	0.439	5	593	0.878
11:00 - 12:00	5	593	0.574	5	593	0.810	5	593	1.384
12:00 - 13:00	5	593	0.709	5	593	1.080	5	593	1.789
13:00 - 14:00	5	593	0.540	5	593	0.607	5	593	1.147
14:00 - 15:00	5	593	0.371	5	593	0.337	5	593	0.708
15:00 - 16:00	5	593	0.979	5	593	0.709	5	593	1.688
16:00 - 17:00	5	593	0.169	5	593	0.439	5	593	0.608
17:00 - 18:00	5	593	0.506	5	593	0.574	5	593	1.080
18:00 - 19:00	5	593	1.755	5	593	0.776	5	593	2.531
19:00 - 20:00	5	593	0.742	5	593	0.607	5	593	1.349
20:00 - 21:00	5	593	0.101	5	593	0.506	5	593	0.607
21:00 - 22:00	5	593	0.236	5	593	0.945	5	593	1.181
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	8.268			8.200			16.468		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

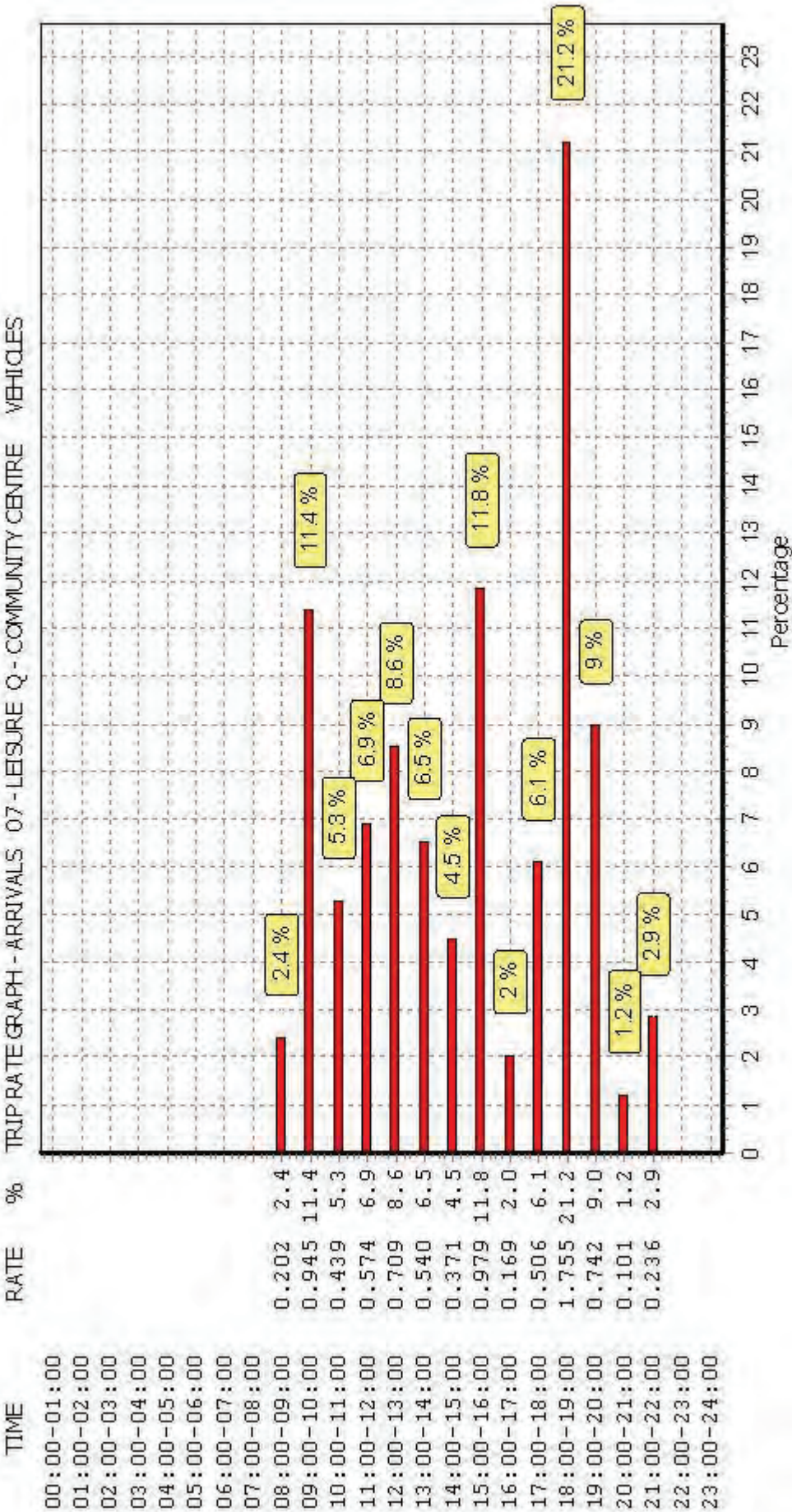
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected:	210 - 1486 (units: sqm)
Survey date range:	01/01/06 - 24/10/13
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

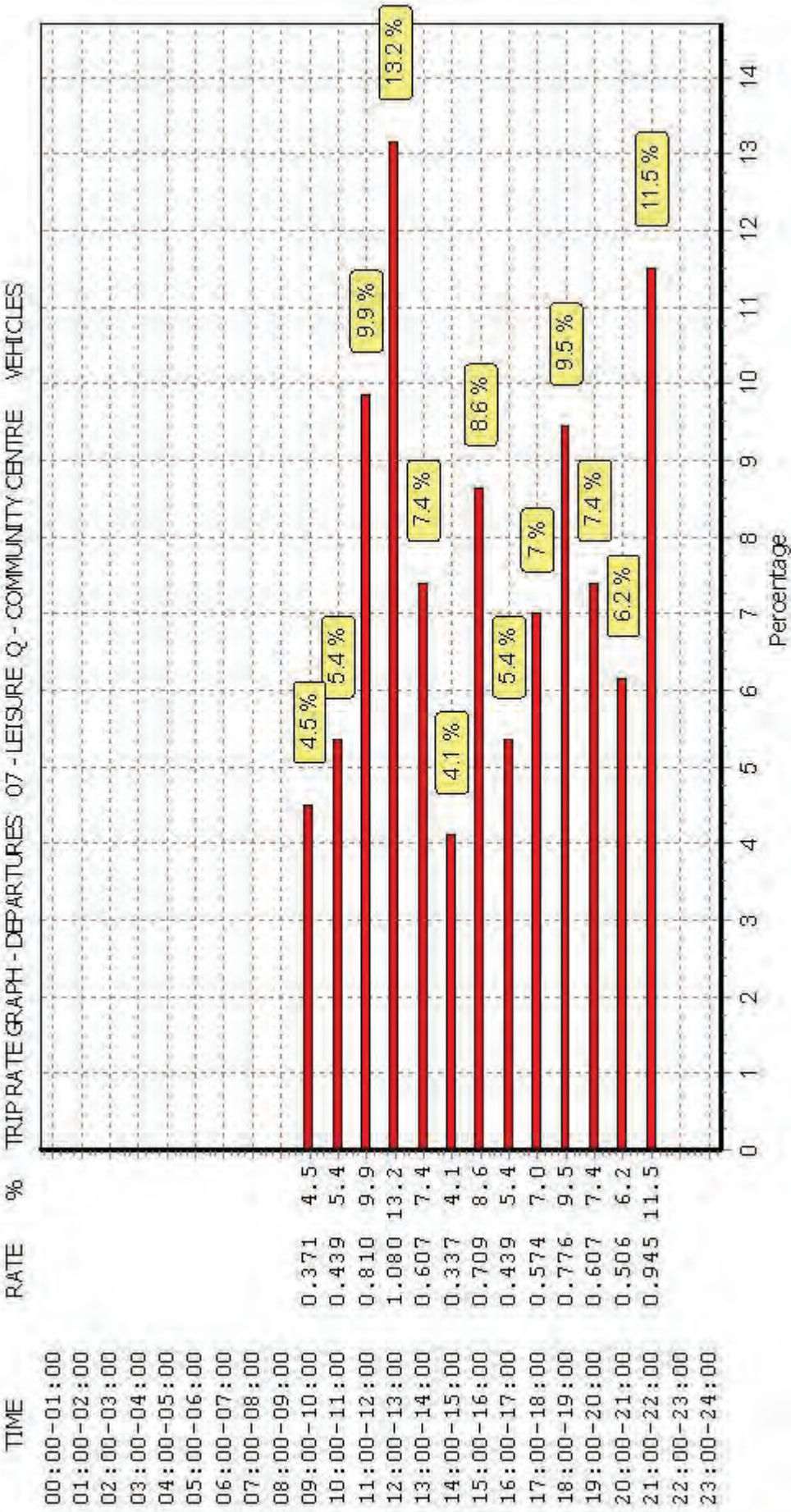
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



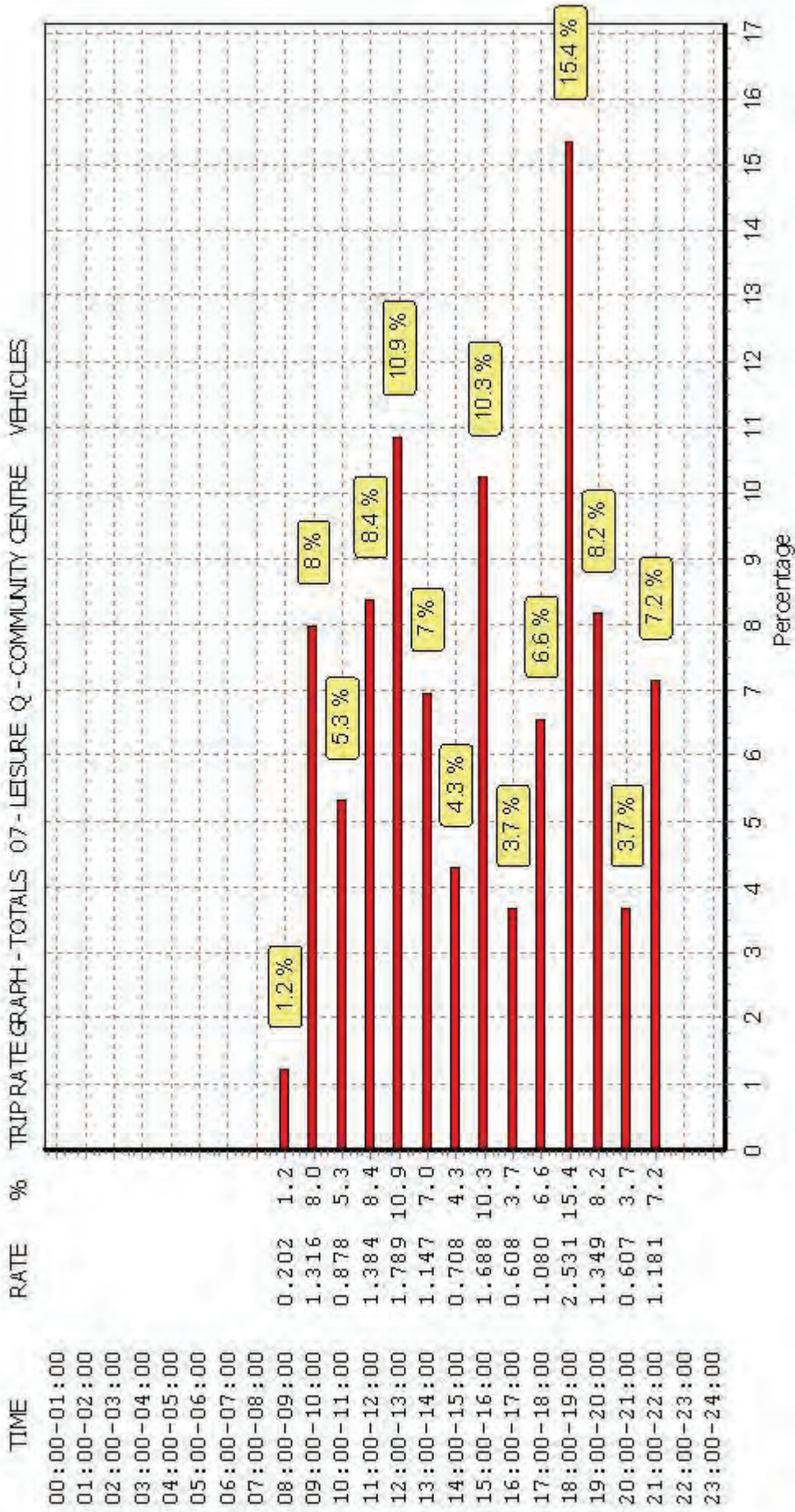
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

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This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 07 - LEISURE/Q - COMMUNITY CENTRE

TAXIS**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00	5	593	0.000	5	593	0.000	5	593	0.000
09:00 - 10:00	5	593	0.000	5	593	0.000	5	593	0.000
10:00 - 11:00	5	593	0.000	5	593	0.000	5	593	0.000
11:00 - 12:00	5	593	0.000	5	593	0.000	5	593	0.000
12:00 - 13:00	5	593	0.000	5	593	0.000	5	593	0.000
13:00 - 14:00	5	593	0.034	5	593	0.000	5	593	0.034
14:00 - 15:00	5	593	0.000	5	593	0.034	5	593	0.034
15:00 - 16:00	5	593	0.000	5	593	0.000	5	593	0.000
16:00 - 17:00	5	593	0.000	5	593	0.000	5	593	0.000
17:00 - 18:00	5	593	0.000	5	593	0.000	5	593	0.000
18:00 - 19:00	5	593	0.135	5	593	0.135	5	593	0.270
19:00 - 20:00	5	593	0.034	5	593	0.034	5	593	0.068
20:00 - 21:00	5	593	0.101	5	593	0.000	5	593	0.101
21:00 - 22:00	5	593	0.067	5	593	0.169	5	593	0.236
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.371			0.372			0.743

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

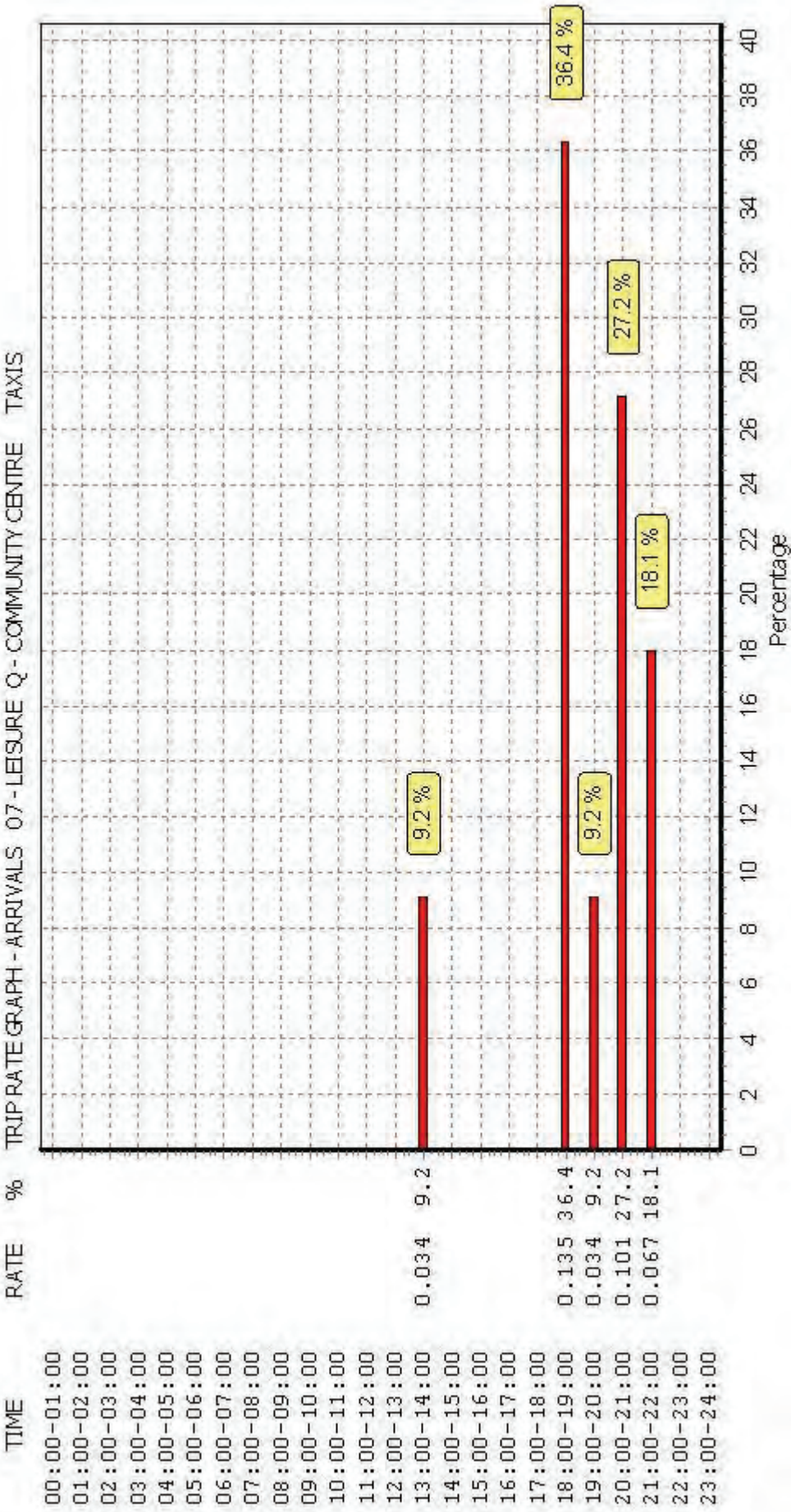
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected:	210 - 1486 (units: sqm)
Survey date range:	01/01/06 - 24/10/13
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

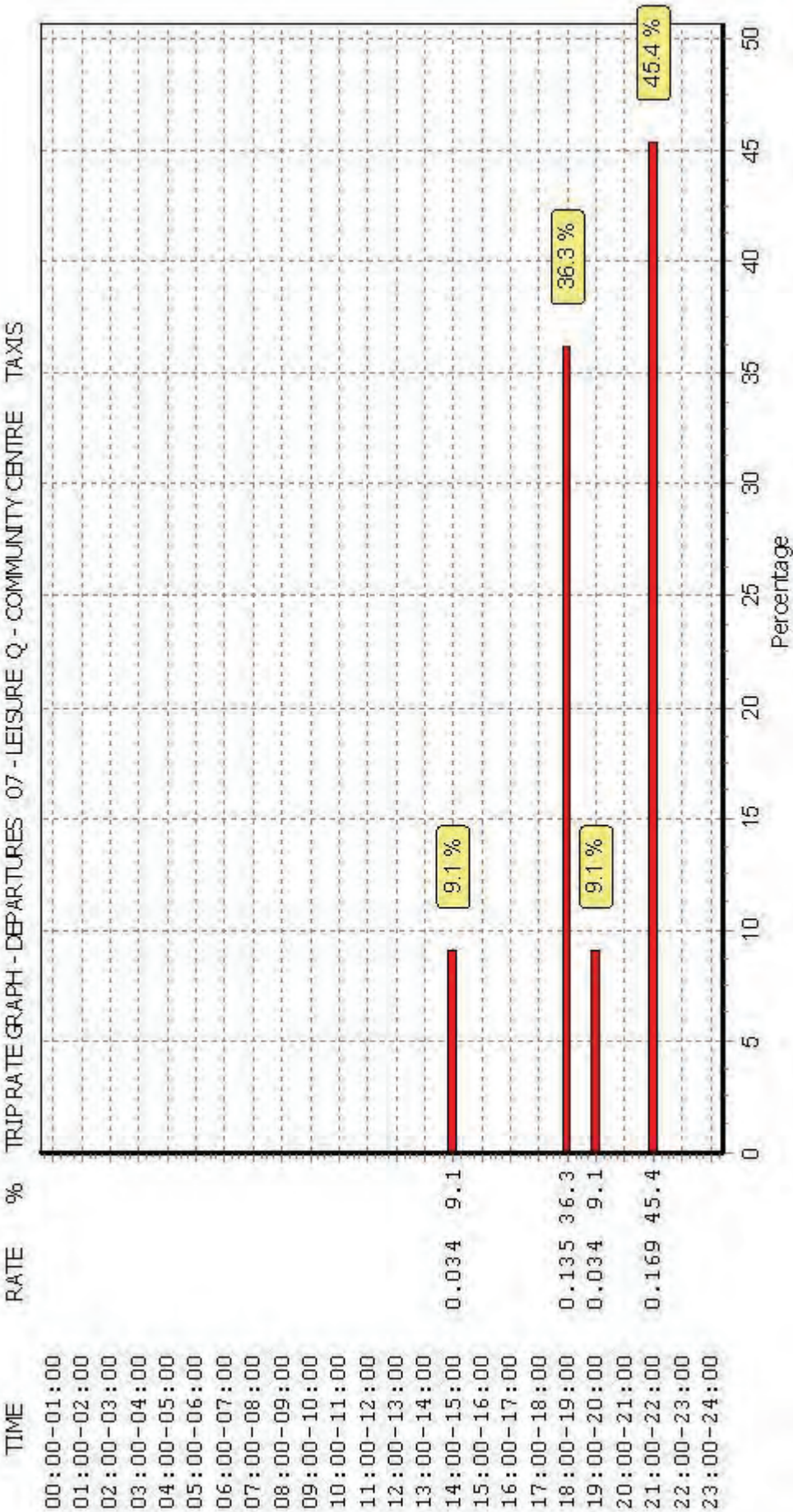
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



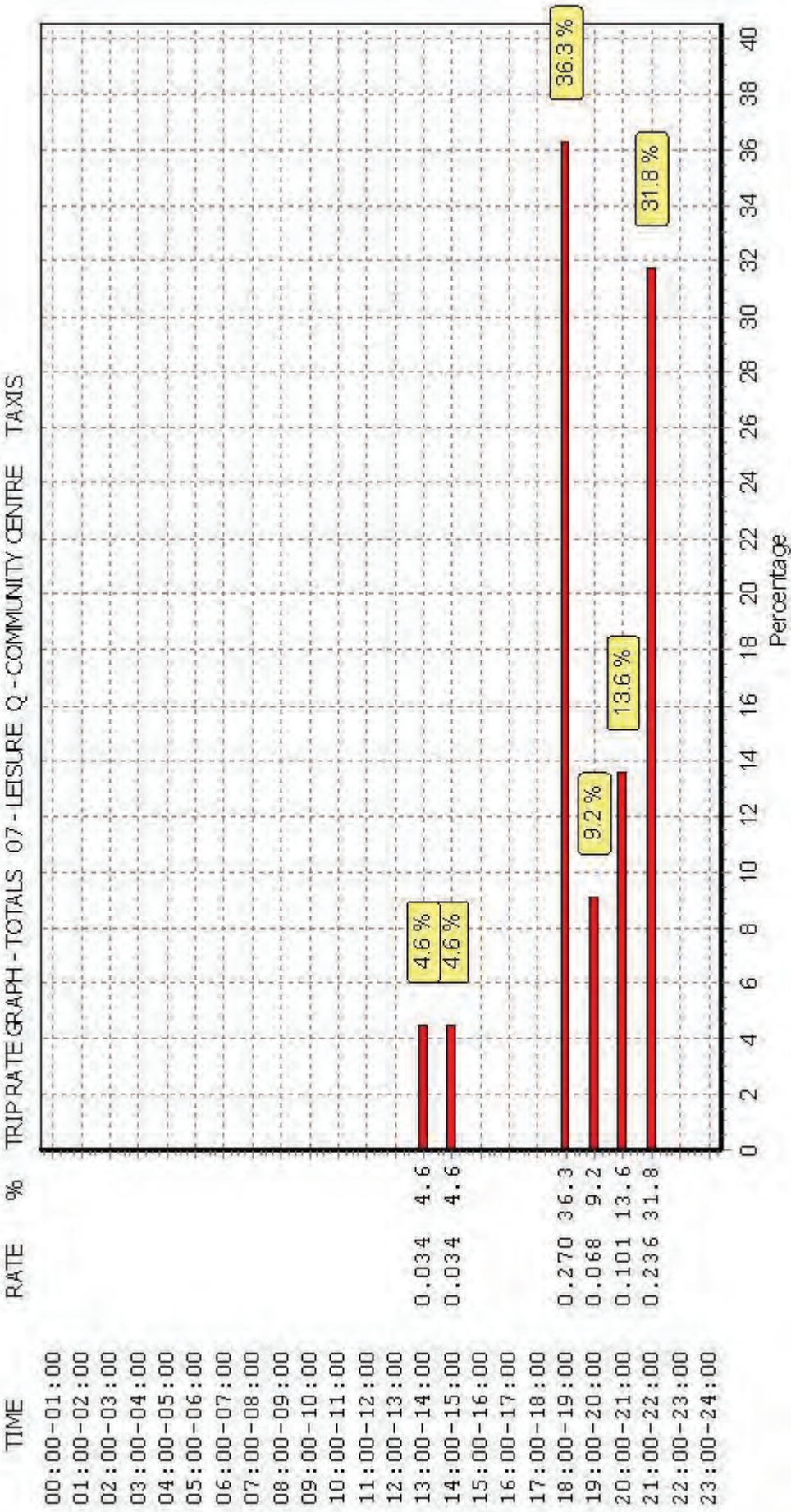
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



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TRIP RATE for Land Use 07 - LEISURE/Q - COMMUNITY CENTRE

OGVS**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00	5	593	0.000	5	593	0.000	5	593	0.000
09:00 - 10:00	5	593	0.000	5	593	0.000	5	593	0.000
10:00 - 11:00	5	593	0.034	5	593	0.034	5	593	0.068
11:00 - 12:00	5	593	0.000	5	593	0.000	5	593	0.000
12:00 - 13:00	5	593	0.000	5	593	0.000	5	593	0.000
13:00 - 14:00	5	593	0.000	5	593	0.000	5	593	0.000
14:00 - 15:00	5	593	0.000	5	593	0.000	5	593	0.000
15:00 - 16:00	5	593	0.000	5	593	0.000	5	593	0.000
16:00 - 17:00	5	593	0.000	5	593	0.000	5	593	0.000
17:00 - 18:00	5	593	0.000	5	593	0.000	5	593	0.000
18:00 - 19:00	5	593	0.000	5	593	0.000	5	593	0.000
19:00 - 20:00	5	593	0.000	5	593	0.000	5	593	0.000
20:00 - 21:00	5	593	0.000	5	593	0.000	5	593	0.000
21:00 - 22:00	5	593	0.000	5	593	0.000	5	593	0.000
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.034			0.034			0.068

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

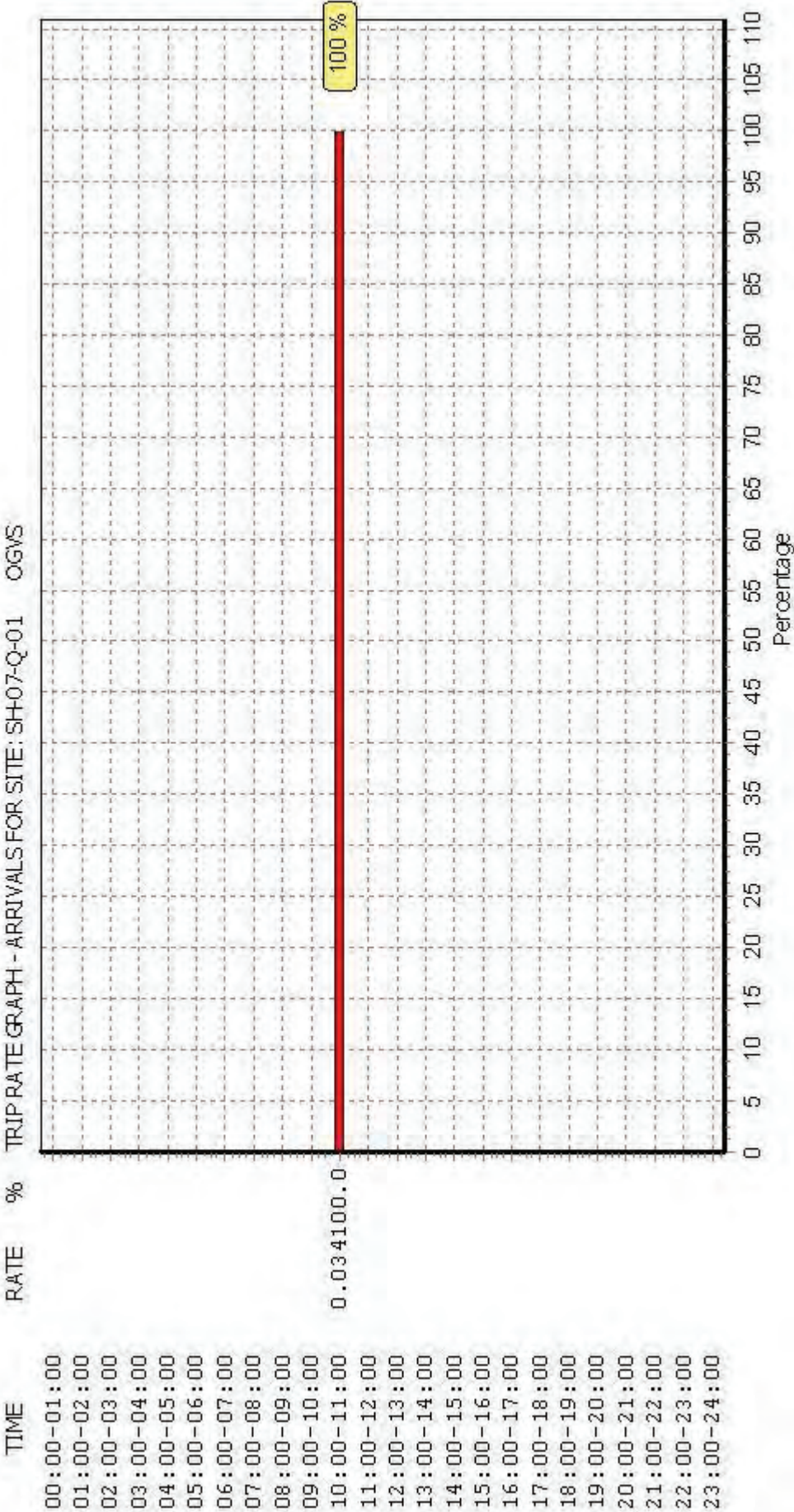
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected:	210 - 1486 (units: sqm)
Survey date date range:	01/01/06 - 24/10/13
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

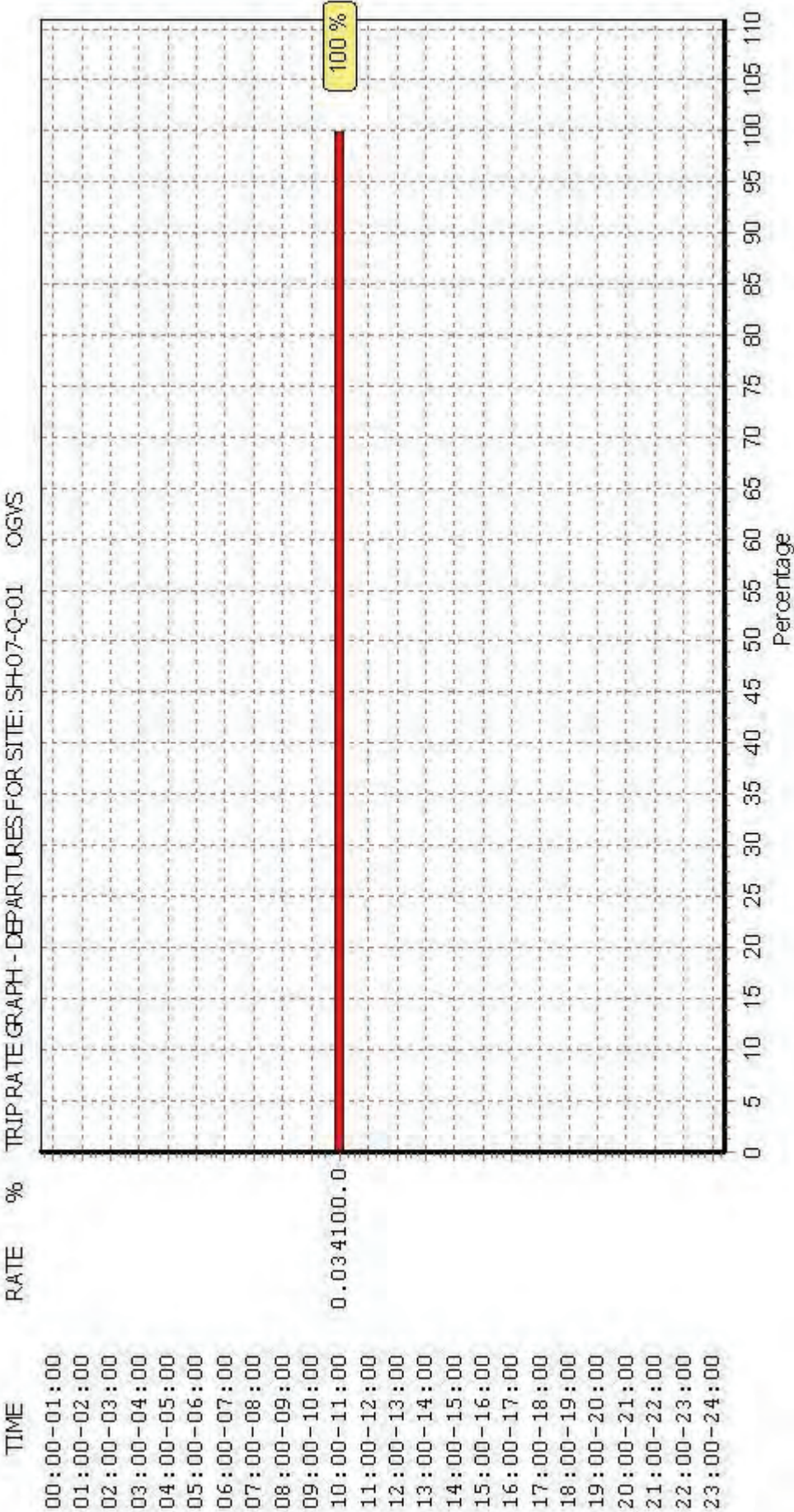
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901



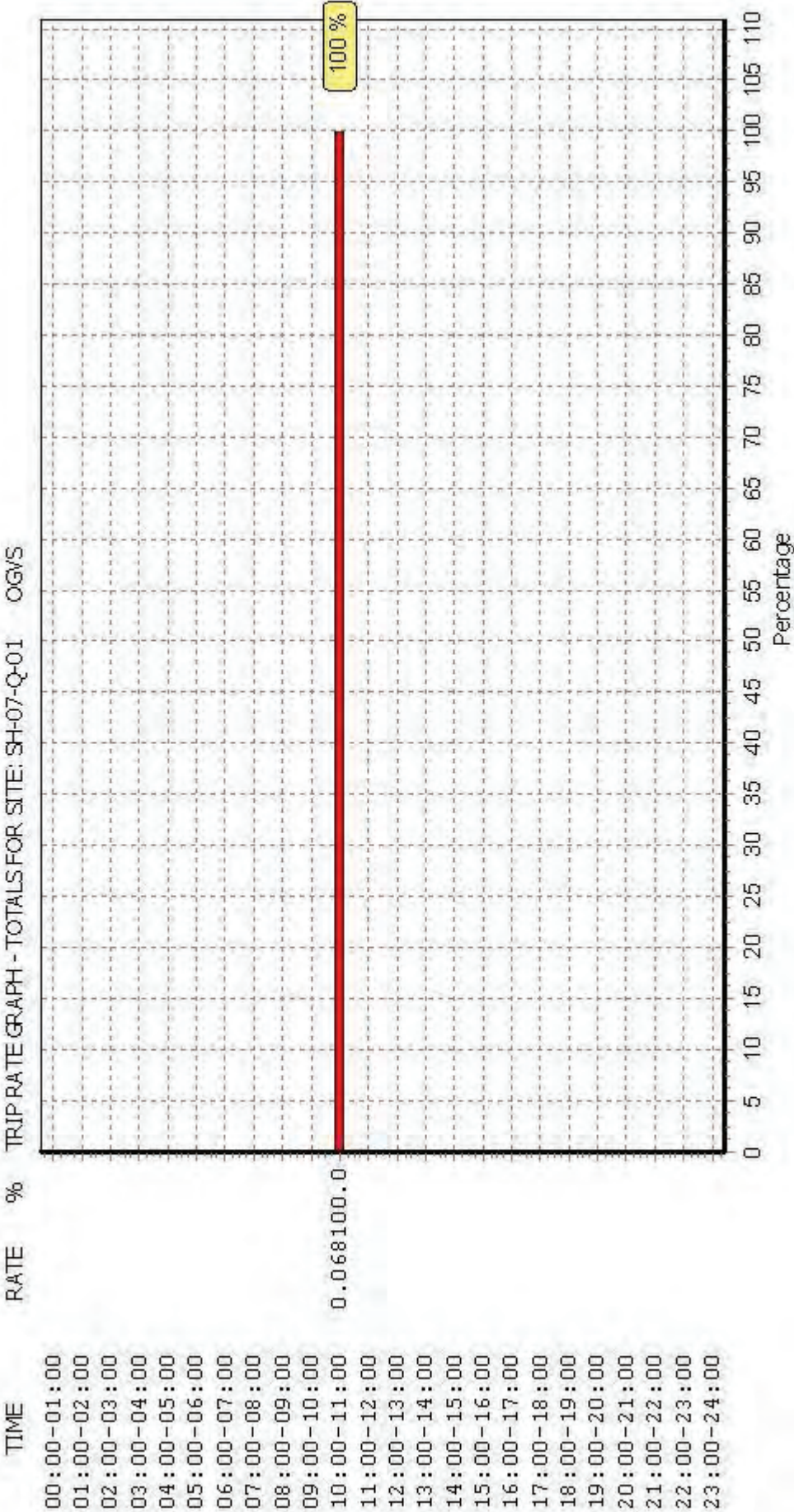
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 07 - LEISURE/Q - COMMUNITY CENTRE

PSVS**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00	5	593	0.000	5	593	0.000	5	593	0.000
09:00 - 10:00	5	593	0.000	5	593	0.000	5	593	0.000
10:00 - 11:00	5	593	0.000	5	593	0.000	5	593	0.000
11:00 - 12:00	5	593	0.000	5	593	0.000	5	593	0.000
12:00 - 13:00	5	593	0.000	5	593	0.000	5	593	0.000
13:00 - 14:00	5	593	0.000	5	593	0.000	5	593	0.000
14:00 - 15:00	5	593	0.000	5	593	0.000	5	593	0.000
15:00 - 16:00	5	593	0.000	5	593	0.000	5	593	0.000
16:00 - 17:00	5	593	0.000	5	593	0.000	5	593	0.000
17:00 - 18:00	5	593	0.000	5	593	0.000	5	593	0.000
18:00 - 19:00	5	593	0.000	5	593	0.000	5	593	0.000
19:00 - 20:00	5	593	0.000	5	593	0.000	5	593	0.000
20:00 - 21:00	5	593	0.000	5	593	0.000	5	593	0.000
21:00 - 22:00	5	593	0.000	5	593	0.000	5	593	0.000
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

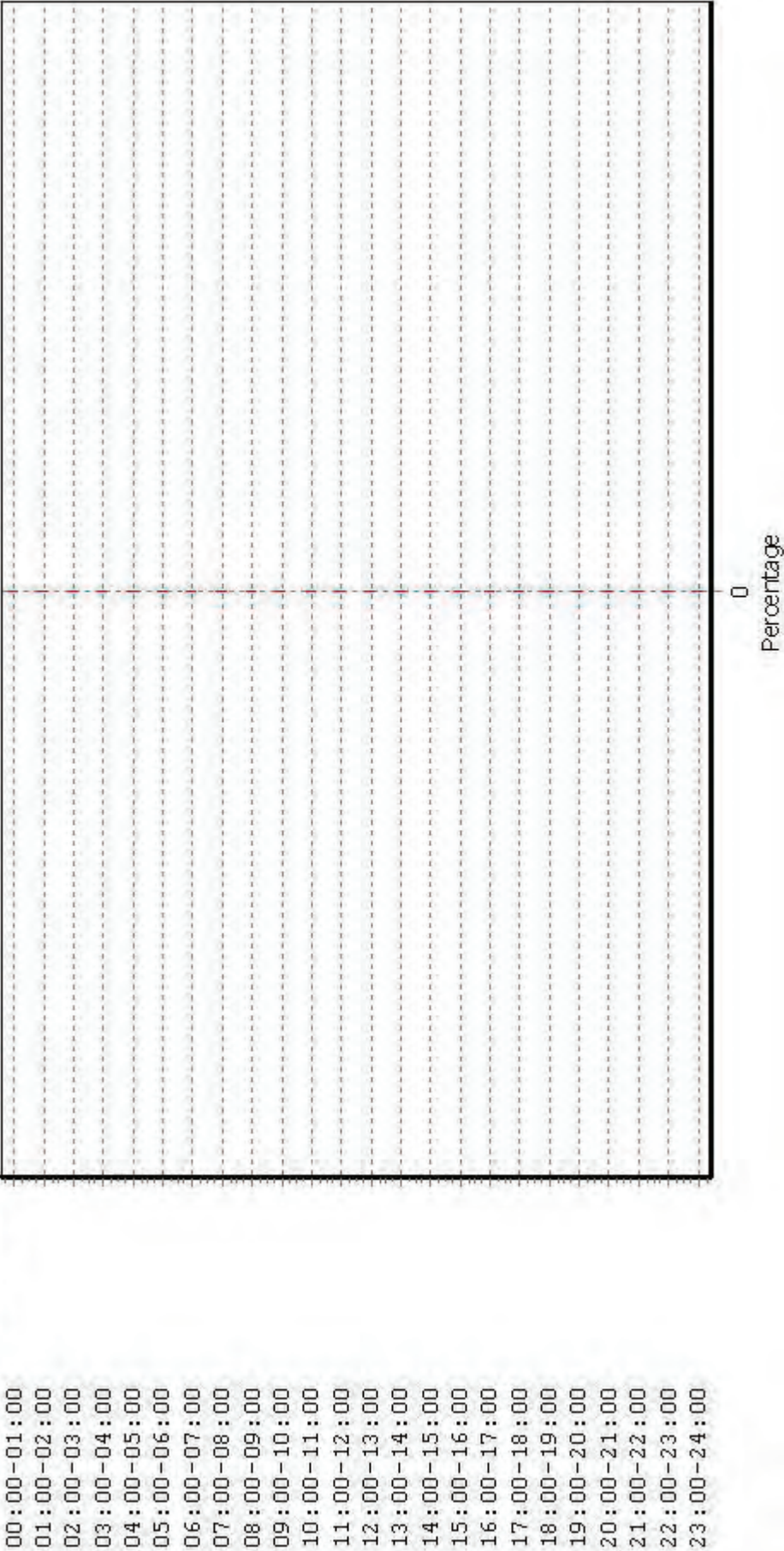
Parameter summary

Trip rate parameter range selected:	210 - 1486 (units: sqm)
Survey date date range:	01/01/06 - 24/10/13
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Licence No: 349901

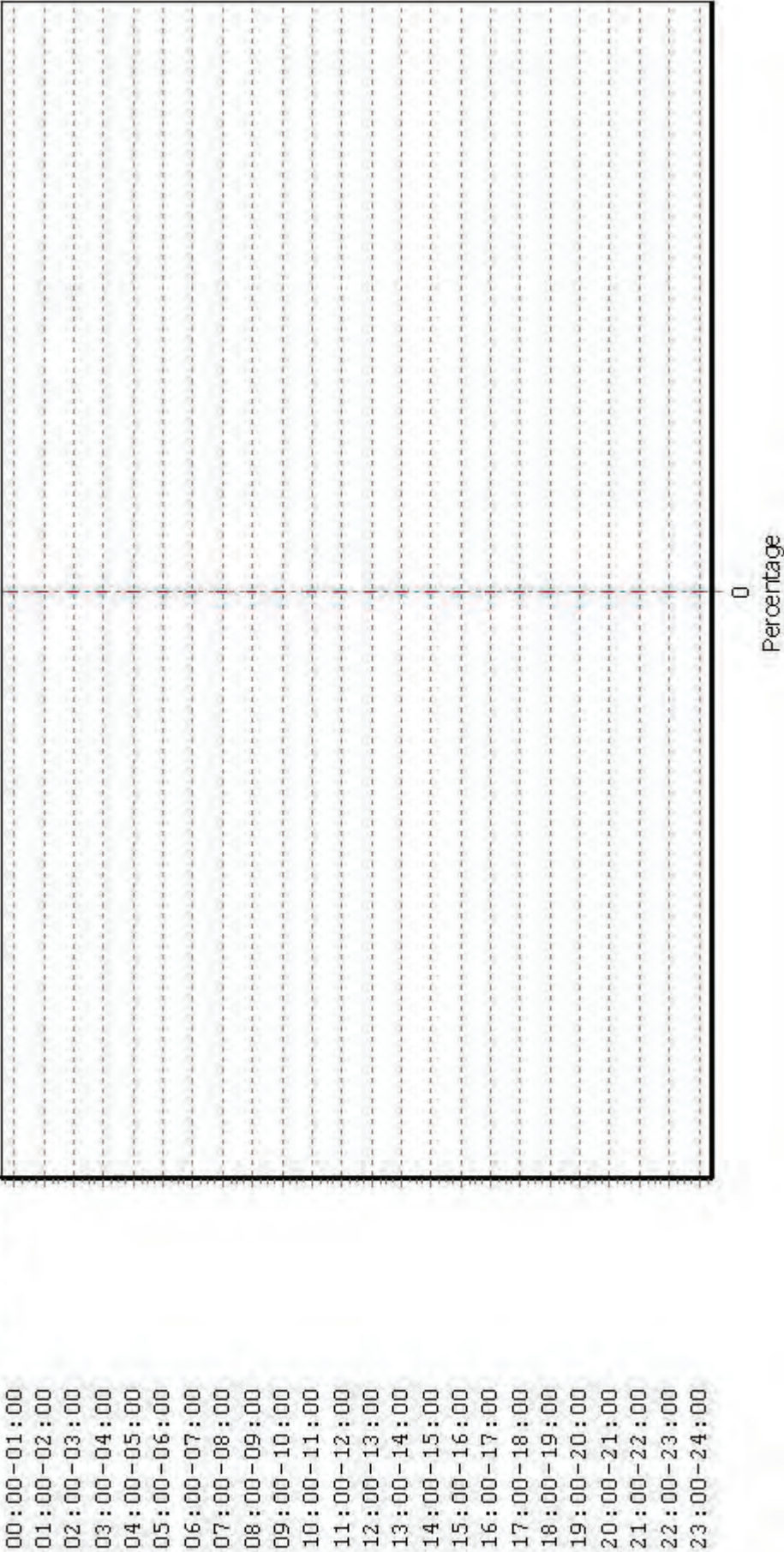
TRIP RATE GRAPH - ARRIVALS 07 - LEISURE Q - COMMUNITY CENTRE PSVS



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901

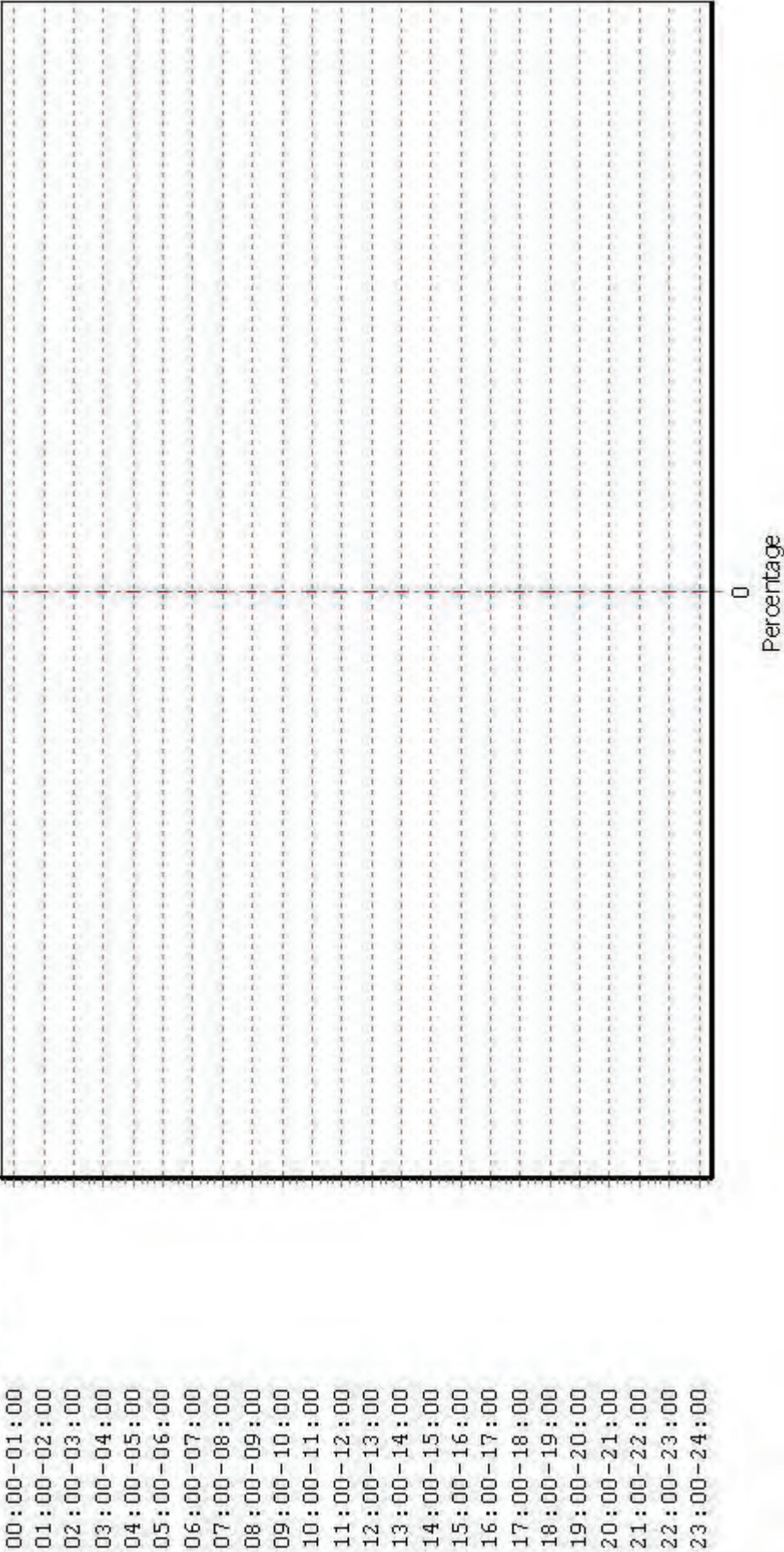
TRIP RATE GRAPH - DEPARTURES 07 - LEISURE Q - COMMUNITY CENTRE PSVS



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

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TRIP RATE GRAPH - TOTALS 07 - LEISURE Q - COMMUNITY CENTRE PSVS



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

TRIP RATE for Land Use 07 - LEISURE/Q - COMMUNITY CENTRE

CYCLISTS**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00	5	593	0.000	5	593	0.000	5	593	0.000
09:00 - 10:00	5	593	0.000	5	593	0.000	5	593	0.000
10:00 - 11:00	5	593	0.000	5	593	0.000	5	593	0.000
11:00 - 12:00	5	593	0.034	5	593	0.034	5	593	0.068
12:00 - 13:00	5	593	0.000	5	593	0.000	5	593	0.000
13:00 - 14:00	5	593	0.000	5	593	0.000	5	593	0.000
14:00 - 15:00	5	593	0.000	5	593	0.000	5	593	0.000
15:00 - 16:00	5	593	0.034	5	593	0.034	5	593	0.068
16:00 - 17:00	5	593	0.000	5	593	0.000	5	593	0.000
17:00 - 18:00	5	593	0.000	5	593	0.000	5	593	0.000
18:00 - 19:00	5	593	0.000	5	593	0.000	5	593	0.000
19:00 - 20:00	5	593	0.067	5	593	0.000	5	593	0.067
20:00 - 21:00	5	593	0.000	5	593	0.067	5	593	0.067
21:00 - 22:00	5	593	0.000	5	593	0.000	5	593	0.000
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.135			0.135			0.270

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

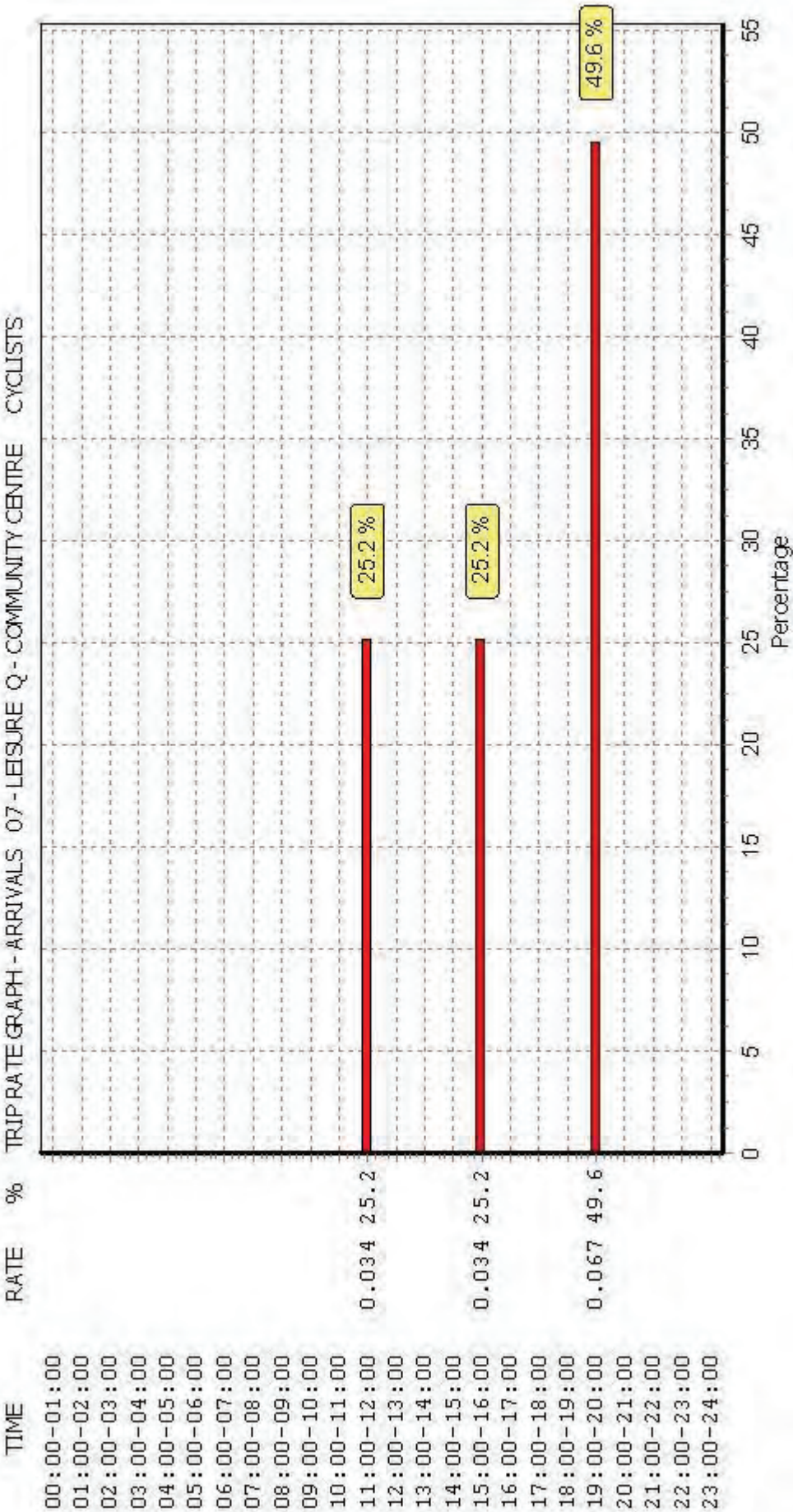
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Parameter summary

Trip rate parameter range selected:	210 - 1486 (units: sqm)
Survey date range:	01/01/06 - 24/10/13
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

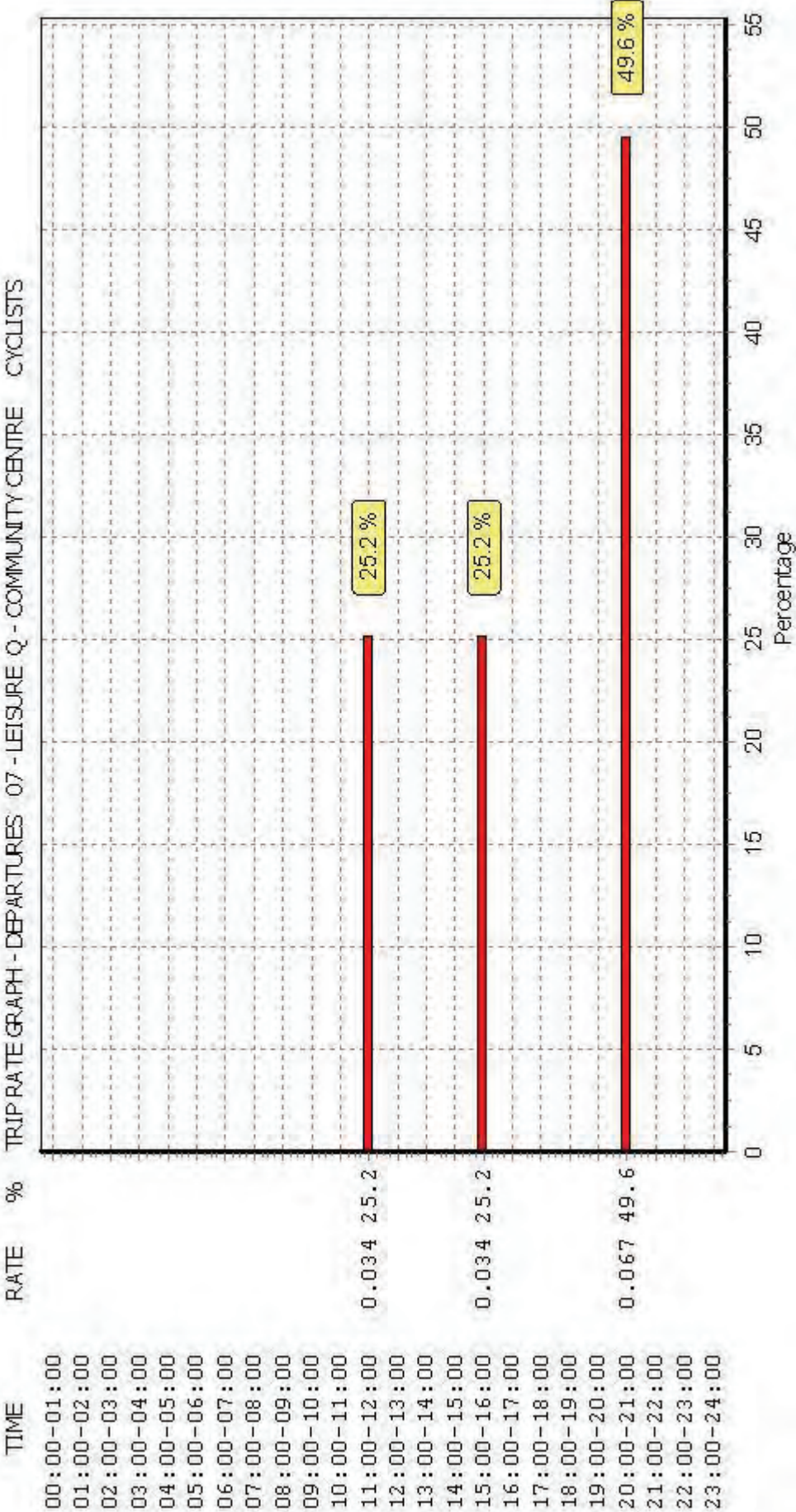
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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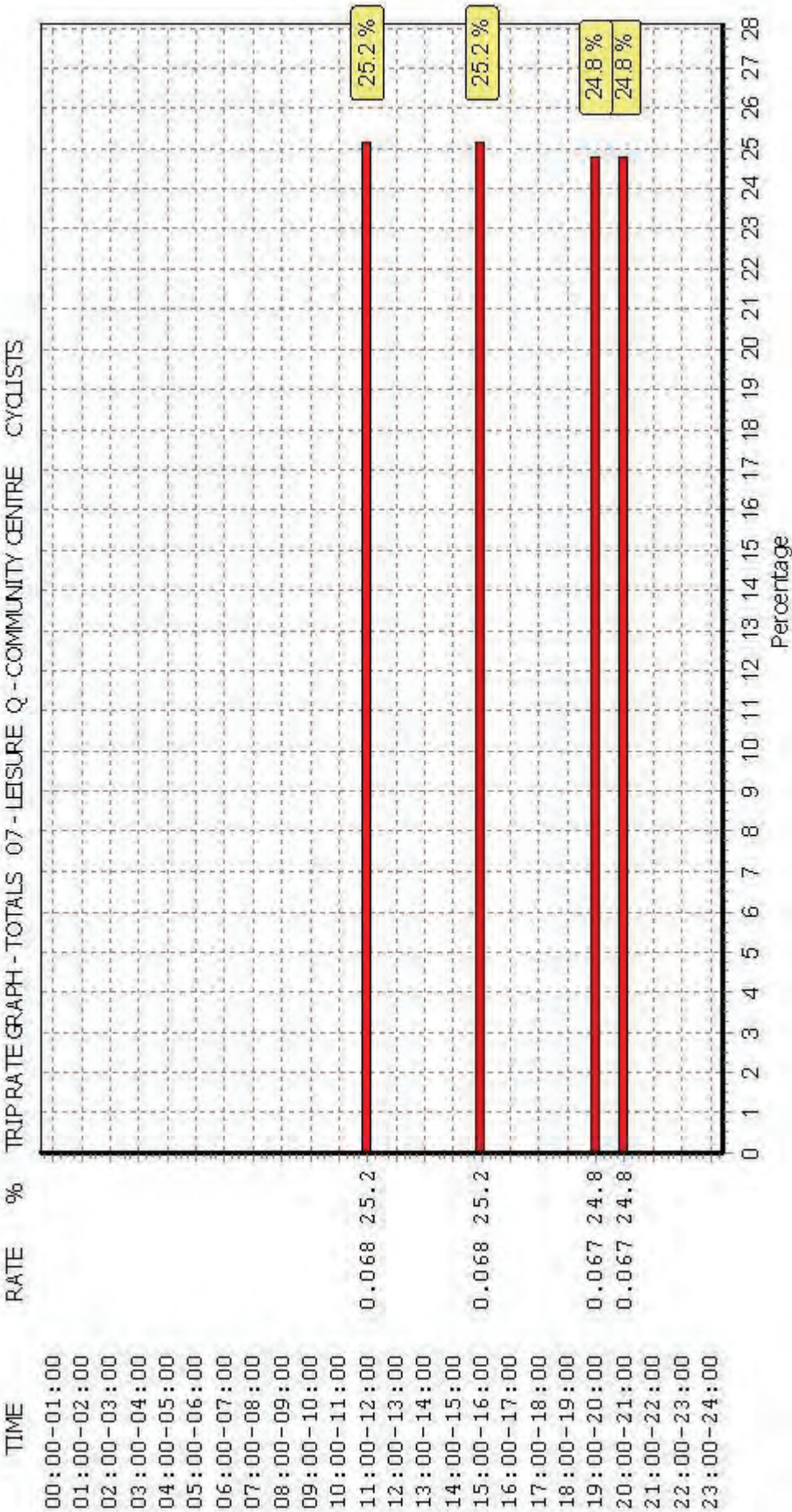
This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

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This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Licence No: 349901



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

Appendix D

Stage 1 Road Safety Audit & Designer's Response

**Land at Jeffrey's Farm
Sugar Lane
Horsted Keynes
West Sussex**

Residential Development – Proposed Access & Informal Crossing

STAGE 1 ROAD SAFETY AUDIT

Report No. EC/2016/09/GTA4

September 2016



Prepared by:

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Date: 29 September 2016

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Date: 29 September 2016

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1. INTRODUCTION

1.1 General

1.1.1 Elix Consultancy Limited has been commissioned by GTA Civils to undertake a Stage 1 Road Safety Audit on the proposed residential development to be located on land at Jeffrey's Farm, Horsted Keynes, West Sussex. Horsted Keynes is located about 5 miles north east of Haywards Heath, in the Weald. The proposal consists of a residential development of approximately 42 units with a new vehicular access onto Sugar Lane. The proposed access includes a footway into the site and as such also proposes a new footway to be installed opposite the vehicular access into the road known as Jefferies. An informal crossing would then be provided for pedestrians gaining access to the new development. The footway would assist in providing a link between the new development and the existing local roads and village. This report describes a Stage 1 Road Safety Audit of the proposed access arrangements and highway changes as part of the development.

1.1.2 The scope of the audit relates to the proposed access onto Sugar Lane and associated minor changes in conjunction with the vehicular and pedestrian access to the site.

1.1.3 Sugar Lane adjoins Keyford Lane to one end and Lewes Road to the other which serves as a local access road to a number of residential properties. It is a single carriageway rural road subject to a 30mph speed limit with no footways provided either side. The road also currently has no street lighting with large grass verges and/or banks between any adjoining roads and/or fronting properties.

1.1.4 The Road Safety Audit Team Membership was the following:

Paul Nevard
MSc, BA (Hons) CMILT, MCIHT, MSoRSA

Director - Elix Consultancy Ltd
Principal Traffic Engineer
Road Safety Audit Team Leader

Vinny Rey
BA (Hons) MCIHT, MSoRSA

Elix Consultancy Ltd
Principal Traffic Engineer
Road Safety Audit Team Member

1.1.5 This audit took place at the Elix Consultancy office on Friday 23rd September 2016 and the site was examined by Paul Nevard and Vinny Rey together in daylight hours between 12.00 and 12.45 hours, Monday 26th September 2016. The weather during the daytime site visit was overcast with earlier rain showers resulting in a wet road surface. Traffic flows were light and vehicle speeds were observed as being low.

1.1.6 The Road Safety Audit also comprised of an examination of the site supplied to the Road Safety Audit Team, referenced in Appendix A of this report. The location of problems raised can be found within the report, photographed for reference or referenced in Appendix B of this report.

1.1.7 The terms of reference of the Road Safety Audit are as described in the Design Manual for Roads and Bridges (DMRB) Standard HD19/15. The Road Safety Audit Team has examined and reported only on the road safety implications of the scheme as presented and has not examined or verified the compliance of the designs to any other criteria. This Road Safety Audit has not considered structural safety or checked for compliance to standards. This safety audit does not perform any "Technical Check" function on these proposals. It is assumed that the Project Sponsor is satisfied that such a "Technical Check" has been successfully completed prior to requesting this safety audit.

1.1.8 This Road Safety Audit has been undertaken based on the Road Safety Audit Team's previous experience and knowledge in undertaking Accident Investigation, Road Safety Engineering and Road Safety Audits. No member of the Road Safety Audit Team has had any previous input to the design of the scheme. The audit has been carried out with the sole purpose of identifying any features of the design that could be removed or modified in order to improve the safety of the scheme. The problems identified have been noted in this report together with suggestions for safety improvements, which we recommend should be studied for implementation.

1.1.9 All 'Problems' are considered of potential significance to road safety and to warrant further consideration by the scheme's promoters and designers.

1.2 Purpose of Scheme

1.2.1 The purpose of the scheme is to provide a new vehicular access onto the public highway with a proposed informal crossing and footway amendments to Sugar Lane and Jefferies.

2. PROBLEMS IDENTIFIED IN PREVIOUS ROAD SAFETY AUDITS

No previous audits have been supplied to the Audit Team and the Audit Team believe that none have been produced.

3. PROBLEMS IDENTIFIED AT THIS STAGE 1 ROAD SAFETY AUDIT

3.1 General

No Problems identified in this category at this Stage.

3.2 Local Alignment

No Problems identified in this category at this Stage.

3.3

Junctions

No Problems identified in this category at this Stage.

3.4 Non-Motorised User Provision

3.4.1 PROBLEM

Location: Proposed informal crossing – Sugar Lane.

Summary: Proposed informal crossing could compromise pedestrian safety with limited sightlines resulting in pedestrian collisions.

Detail: It is proposed to introduce an informal crossing from the new footway into the residential development across Sugar Lane to adjoin a new footway to be constructed that links to Jefferies. However, when crossing the carriageway from the pedestrian crossing, visibility to the north is limited and restricted by not only vegetation and foliage but also by the gradient and slight bend to Sugar Lane. As a result of the limited visibility, this could result in drivers travelling along Sugar Lane failing to give way to pedestrians crossing the road resulting in pedestrian and vehicle conflict.

RECOMMENDATION

Relocate proposed informal crossing. This may also result in required amendments to the footway link into the proposed residential development.



3.5 Road Signs, Carriageway Markings & Street Lighting

No Problems identified in this category at this Stage.

[End of list of Problems identified and Recommendations offered in this Stage 1 Audit](#)

4. **AUDIT TEAM STATEMENT**

We certify that this audit has been carried out in accordance with HD 19/15.

AUDIT TEAM LEADER

Paul Nevard

Signed:



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Date: 29/09/2016

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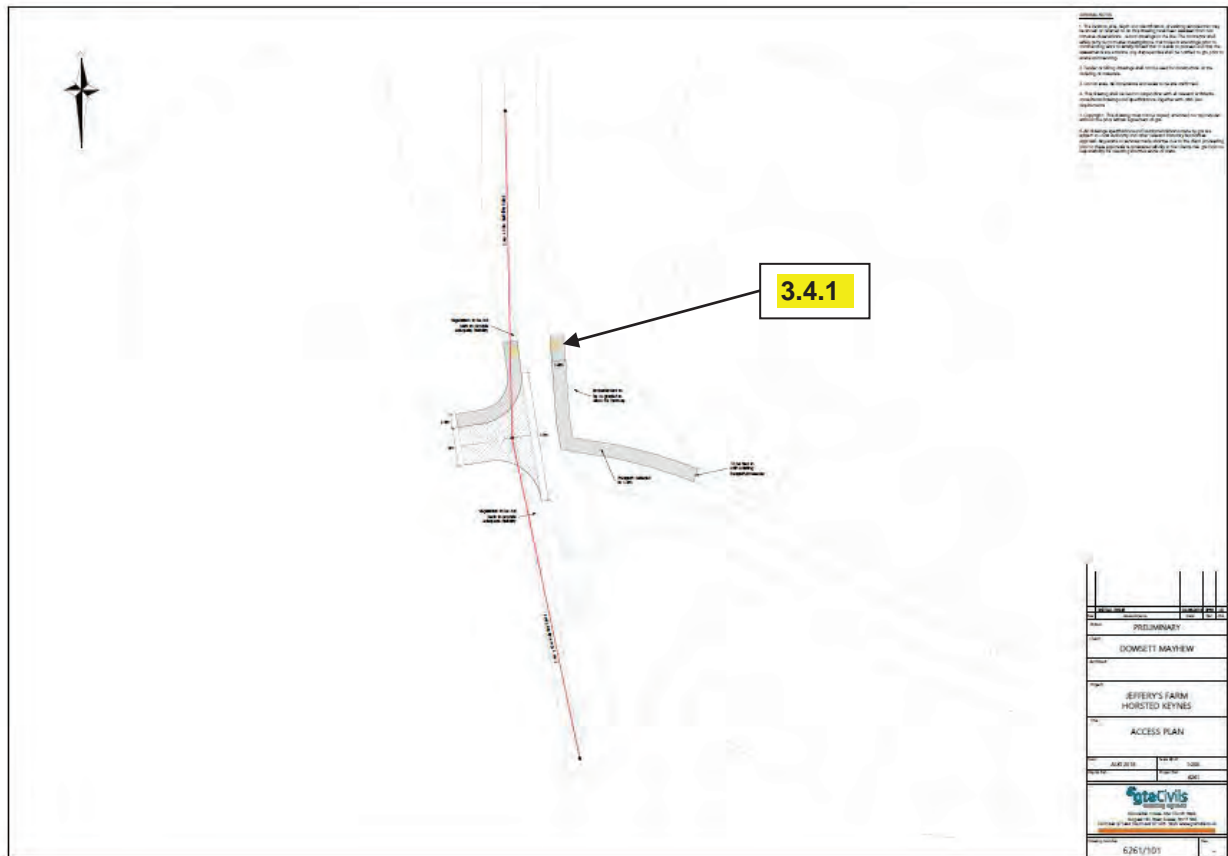
APPENDIX A

List of documents and plans considered during this Stage 1 Road Safety Audit:

- C1601(08)01A Proposed Site Layout UPDATED.PDF
- 6261_101_Access Plan.pdf
- Site Location - Land at Jeffrey's Farm.pdf

APPENDIX B

Location of problems identified at this Stage 1 Road Safety Audit



Designers Response to RSA1

Land at Jeffrey's Farm, Horsted Keynes, West Sussex



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3	Conclusion	4

Issue	Issue date	Compiled	Authorised
DRAFT	30 th September 2016	RS	LNS

Compiled by: Rachel Stevenson

Authorised by: Lawrence Stringer CEng, MCIHT, MRTPI

1 Introduction

- 1.1 Elix Consultancy Limited has been commissioned by GTA Civils Ltd to undertake a Stage 1 Road Safety Audit on the proposed residential development to be located on land at Jeffrey's Farm, Horsted Keynes, West Sussex. Horsted Keynes is located about 5 miles north east of Haywards Heath, in the Weald. The proposal consists of a residential development of approximately 42 units with a new vehicular access onto Sugar Lane. The proposed access includes a footway into the site and as such also proposes a new footway to be installed opposite the vehicular access into the road known as Jefferies. An informal crossing would then be provided for pedestrians gaining access to the new development. The footway would assist in providing a link between the new development and the existing local roads and village.
- 1.2 Sugar Lane adjoins Keyford Lane to one end and Lewes Road to the other which serves as a local access road to a number of residential properties. It is a single carriageway rural road subject to a 30mph speed limit with no footways provided either side. The road also currently has no street lighting with large grass verges and/or banks between any adjoining roads and/or fronting properties.

2 Designers response to the RSA1

- 2.1 A number of points were raised through the RSA1 process. These are listed in the table 1 below, together with the recommendation and Designer's Response.

Table 1 – RSA1 Problems, Recommendations & Designer's Response

Problem	Location	Description	Recommendation	Designers Response	Comments
3.4.1	Proposed informal crossing – Sugar Lane.	Proposed informal crossing could compromise pedestrian safety with limited sightlines resulting in pedestrian collisions.	Relocate proposed informal crossing. This may also result in required amendments to the footway link into the proposed residential development.	Agreed. The informal pedestrian crossing point across Sugar Lane has been moved to south of the junction with Jefferies to ensure adequate visibility is provided.	

3 Conclusion

- 3.1 There was one problem raised through the RSA1 process which is of a fairly minor nature and relatively straightforward to address. Therefore, the RSA1 has not raised any fundamental problems cannot be resolved.

- End of Report -



Drainage - Flood Risk - Highways - Transport

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GTA Civils Limited, Registered in England No. 4192991. VAT Registration No. 777 5043 04

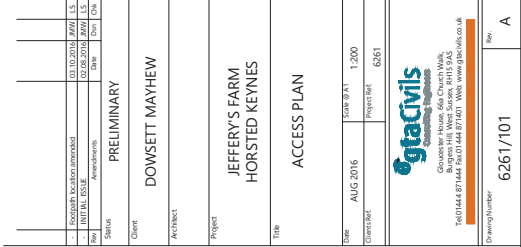


Appendix E

Access & Footway Improvement Plan



1. The location, size, depth and identification of existing services that may be shown or referred to on this drawing shall be ascertained from non-client sources and confirmed by the client prior to the start of the design. It is the responsibility of the client to ensure that all existing services are safely surveyed in advance, and before commencing work to ensure that the services are as shown and identified on the drawing. The client shall be responsible for any disruption and/or damage to the ground and any services commencing work to safely investigate, but not to go further than the services are shown on the drawing.
2. Trenching or boring drawings shall not be used for construction or the erection of materials.
3. Do not scale. All dimensions and levels to be site confirmed.
4. This drawing shall be used in conjunction with all relevant architect, consultant drawings and specifications, together with all relevant planning requirements.
5. Copyright: This drawing must not be copied, amended nor reproduced without the prior written agreement of a sign.
6. All drawings specifications and recommendations made by the signatory shall be taken as an indication of the signatory's professional opinion. Any works or services noted otherwise due to the client proceeding with the design shall be the responsibility of the client. The signatory shall not be liable for any damage or loss arising from the client's failure to follow the signatory's recommendations or to carry out the works or services as shown on the drawing.





Drainage - Flood Risk - Highways - Transport

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GTA Civils Limited, Registered in England No. 4192991. VAT Registration No. 777 5043 04



Landscape and Visual Impact Appraisal

Proposed Residential Development
Jeffrey's Farm, Lewes Road, Horsted Keynes, West Sussex



Date: 16th September 2016

Revision: 02

PLANNING ISSUE

Author: Andrew Ramsay BA (Hons) MALA CMLI

Ref: RCo180 / LVIA / Rev02 / PLANNING / 16-09-16



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Appendix A: Proposed Development Site - Landscape Features

Appendix B: Viewpoint Photographs

FIGURES

Figure 01: PROW and Viewpoint Locations

Figure 02. Landscape and Planning Policy Designations

Figure 03: Proposed Development and Mitigating Planting Scheme

RCo180 / 02A & 2B Tree Protection Drawings

Existing Tree Schedule

1.0 INTRODUCTION

1.1 The Brief and Background

- 1.1.1 Ramsay & Co has been commissioned by Ms. Helena Griffiths to undertake a Landscape and Visual Impact Appraisal (LVIA) for a proposed residential development to a location immediately west of Jeffrey's Farm, Lewes Road, Horsted Keynes and to fields west of Sugar Lane, Horsted Keynes (north of Jeffrey's Farm).
- 1.1.2 Jeffrey's Farm comprises a mix of low grade agricultural buildings, barns, storage containers and a farm house which lie to the west of Horsted Keynes - to the north is Keysford Lane and Sugar Lane lies to the east.
- 1.1.3 The requirement for a Landscape and Visual Impact Appraisal has been identified by the planning consultant: Dowsett Mayhew Planning Partnership. This report will assess and identify the potential landscape and visual effects of the proposed residential scheme on the landscape character and visual amenity of the development site and surrounding area. This report has been prepared by Andrew Ramsay (BA Hons) MALA who is a Landscape Architect and a Chartered Member of the Landscape Institute (CMLI).
- 1.1.4 All the relevant photographs and figures are included with this report.
- 1.1.5 This report considers the potential effects of the proposed development on:
- *Landscape character;*
 - *Visual amenity and the people who view the landscape.*

1.2 The Purpose of the Report

- 1.2.1 Within the *Guidelines for landscape and Visual Impact Assessment (Third Edition)* it makes clear there is a difference between *Landscape and Visual Impact Assessments* which are conducted as part of the Environmental Impact Assessment procedure and a standalone 'Appraisal'. GVLIA 3 states: *as a standalone appraisal the process is informal and there is more flexibility, but the essence of the approach – specifying the nature of the proposed change or development; describing the existing landscape and the views and visual amenity in the area that may be affected; predicting the effects, although not their likely significance; and considering how those effects might be mitigated – still applies.*
- 1.2.2 The main objectives of this report are to:
- *evaluate and describe the baseline conditions of the proposed development site;*

- *identify the relevant landscape character of the proposed development site and surrounding area as well as any notable landscape features within the site;*
- *identify the key views and visual receptors in relation to the proposed development site;*
- *assess the sensitivity of the existing landscape character and visual receptors;*
- *assess the size and scale of the landscape and visual effects - magnitude of change;*
- *describe any proposed mitigation measures;*
- *predict and evaluate the overall degree of landscape and visual effects.*

1.2.3 The assessment and scope of work has been identified in accordance with the relevant guidance (Refer to Section 3.0 - Methodology) and includes:

- *A description of the proposed development scheme;*
- *A desktop study and review of the relevant national and local planning policies together with statutory and non-statutory landscape designations;*
- *An identification and assessment of the study area and Zone of Theoretical Visibility (ZTV);*
- *An identification and assessment of the relevant existing landscape character assessments, landscape components and landscape receptors;*
- *An identification and assessment of the key visual receptors and viewpoints in relation to the proposed development site;*
- *A description and assessment of the likely landscape and visual effects and whether they are adverse, beneficial or neutral.*

2.0 DEVELOPMENT PROPOSALS

2.1 Proposed Residential Scheme: Jeffrey's Farm

2.1.1 The proposed residential scheme would comprise a mix of 42 residential units (including 4 x 1 bed bungalows; 4 x 2 bed bungalows; 12 x 2 bed terrace houses; 12 x 3 bedroom semi-detached properties; 5 x 3 bedroom detached properties and 5 x 4/5 bedroom detached houses) which would be arranged off a single access road. Several dwellings would be located to the west of the Jeffrey's Farm area (replacing low grade agricultural buildings and shipping containers) with the remainder of the development located to a field to the north of the farm area. For further details refer to Crowther Architects architectural drawings.

2.1.2 The proposed access road would run west off Sugar Lane (opposite and slightly north of Jefferies) and head north before curving around to the west of the existing farm area. The field to the north-east of the farm area is proposed to be a designated open space and a new community building for village use is proposed

to the north-east corner. The majority of the residential development would be located to a field which lies south of Keysford Lane and west of Sugar Lane.

- 2.1.3 A recreational pedestrian path would allow access to the northern end of Sugar Lane (which does not have a dedicated pedestrian pavement) as well as running through the woodland which lies to the west of the highway. A pedestrian path would also provide a link from the proposed dwellings to the west of the farm area to Sugar Lane via the southern edge of the proposed community space (to the north-east of the farm area).
- 2.1.4 Jeffrey's Farm House and associated garden area does not form part of the proposed development site area and the current farm access off Sugar Lane would be retained. Several agricultural buildings are being retained for agricultural use by the owner (to the east of the farm area).
- 2.1.5 The existing field edge vegetation and mature trees are proposed to be retained and protected wherever possible and an extensive native tree and shrub planting scheme is proposed which would enhance and reinforce the existing planting as well as softening near distance views within the proposed development site area.
- 2.1.6 The development proposals are illustrated on: *RCo180 / Figure 03 / Proposed Development and Mitigating Planting Scheme*.

3.0 METHODOLOGY

3.1 Principles and Overview

- 3.1.1 This report has been prepared in accordance with the following guidance:
- *Guidelines for Landscape and Visual Impact Assessment (GLVIA) Third Edition* published by the Landscape Institute and Institute of Environmental Management and Assessment in 2013;
 - *An Approach to Landscape Character Assessment* published by Natural England 2014;
 - *Photography and Photomontage in landscape and visual impact assessment*; Advice Note 01/11, Published by the Landscape Institute.
- 3.1.2 This Landscape and Visual Impact Appraisal will follow the guidelines for assessment as contained within GLVIA Third Edition.
- 3.1.3 The following Landscape Character Assessments and digital resources were referred to - underlined text include a digital link to the original document:
- *Natural England - National Character Areas Profile: 122 - High Weald (2013)*;
 - *The High Weald Area of Outstanding Natural Beauty Management Plan (2014-2019)*;

- Regional Landscape Character - Landscape Character Assessment of West Sussex (2003): HW1 - High Weald;
- District Landscape Character - A Landscape Character Assessment For Mid Sussex (2005): High Weald;
- *MAGIC Interactive Map, Defra and Natural England.*

3.1.4 The following planning documents were referred to:

- The National Planning Policy Framework;
- Mid Sussex District Council: Mid Sussex Local Plan 2004;

3.1.5 Within the *Guidelines for Landscape and Visual Impact Assessment (Third Edition)* it states: *Landscape and Visual Impact Assessment is a tool used to identify and assess the significance of, and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity.* This report will assess and describe these two elements separately.

3.1.6 *Guidelines for Landscape and Visual Impact Assessment (Third edition)* defines the four essential components which should be included within a Landscape and Visual Impact Appraisal (LVIA):

- *Project Description;*
- *Baseline Studies;*
- *Mitigation;*
- *Identification and Description of Effects.*

3.1.7 GLVIA3 recognises that professional judgement is a very important part of LVIA and within the guidelines it states that: *whilst there is some scope for quantitative measurements of some relatively objective matters..... much of the assessment must rely on qualitative judgements.*

3.2 Baseline Studies

3.2.1 The initial step in LVIA is to establish the baseline landscape and visual conditions. The landscape baseline aims to provide an understanding of the landscape context of the area that may be affected; its constituent elements, character, condition and value. The visual baseline aims to define the area where the development may be visible, the nature of the views and the types of people who may experience the views. The anticipated landscape and visual effects can then be assessed against the existing baseline conditions.

3.2.2 The overall degree of landscape and visual effects can be predicted by making judgements regarding two main components:

- *The value and susceptibility of the visual and landscape receptors to change (sensitivity);*
- *Nature of the effect likely to occur (magnitude of effect).*

- 3.2.3 Assessment of the above criteria is combined to allow the overall degree of landscape and visual effects to be assessed and predicted.

3.3 Assessment of Landscape Effects

- 3.3.1 GVLIA 3 recommends that: *An assessment of landscape effects deals with the effects of change and development on landscape as a resource.* The baseline landscape is described by referring to existing landscape character assessments and by a description of the proposed development site and the surrounding area: *Landscape is an area as perceived by people, whose character is the result of action and interaction of natural and / or human factors.*
- 3.3.2 Landscape character assessments identify and describe the physical influences (geology, soils etc.), human influences (land use, management, etc.) and aesthetic and perceptual qualities providing an overall character of the landscape. They also classify the overall character, including any distinctive landscape types and the particular combinations of aesthetic and perceptual qualities that make them distinctive.
- 3.3.3 Development can give rise to a variety of landscape effects and can include:
- *Change or loss of features and elements which contribute to the character and distinctiveness of the landscape;*
 - *Addition of new features / elements which influence or change the existing landscape character;*
 - *A combination of the above.*

3.4 Sensitivity and Susceptibility to Change of Landscape Receptors

- 3.4.1 Predicting the overall degree of landscape effects is based on an assessment of the sensitivity of the landscape receptor combined with the magnitude of the effect.
- 3.4.2 Sensitivity of a landscape receptor is based on its susceptibility to the type of change or development proposed combined with the value attached to the landscape. Within GVLIA3 it states that sensitivity is; *specific to the particular project or development that is being proposed and to the location in question.* Sensitivity is judged on a scale of *High, Medium or Low.*

Table 01: Criteria for Assessing Landscape Character / Receptor Sensitivity	
High Sensitivity	<p>Landscapes which are:</p> <ul style="list-style-type: none"> • <i>of national importance and which are particularly distinctive with elements that are likely to be substantially changed by the development proposals;</i> • <i>assessed to be in good condition, intact and particularly vulnerable to disturbance;</i> • <i>valued and have little potential for replacement.</i>
Low Sensitivity	<p>Landscapes which:</p> <ul style="list-style-type: none"> • <i>either by designation or assessment have no value / importance attached to the landscape area and/or features;</i> • <i>have few features or qualities susceptible to change;</i> • <i>have features which could be improved and enhanced;</i> • <i>have good potential for replacement or substitution.</i>

- 3.4.3 Susceptibility to change is expressed on a scale of *High*, *Medium* or *Low* and is an assessment of the ability of the landscape receptor to accommodate the proposed development or change without undue consequences for the maintenance of the existing baseline conditions. Within GVLIA3 the guidelines state: *It is possible for an internationally, nationally, or locally important landscape to have relatively low susceptibility to change resulting from the particular type of development in question, by virtue of both the characteristics of the landscape and the nature of the proposal.*

Table 02: Criteria for Assessing Landscape Character / Receptor Susceptibility	
High Susceptibility	<ul style="list-style-type: none"> • <i>The landscape effects, as a consequence of the development would change the quality or condition of the overall character of a landscape type / area;</i> • <i>As a consequence of the development, the landscape effects would alter or remove landscape elements or components, change aesthetic or perceptual qualities important to that landscape character or introduce new elements which would be inappropriate to the existing landscape character;</i> • <i>The development would be contrary to current landscape planning policies and strategies relating to the landscape.</i>
Low Susceptibility	<ul style="list-style-type: none"> • <i>The changes as a consequence of the development proposals would not affect the existing character / quality / condition of the existing landscape character;</i> • <i>the aims of existing planning policies / strategies would not be compromised by the proposed development;</i> • <i>The development proposals would not remove or alter landscape components / receptors which are important to the existing landscape character or introduce new elements incongruous to the existing landscape character.</i>

3.4.4 The value of the landscape is expressed on a scale of *High, Medium* or *Low* and is defined by assessing the information which contributes to understanding landscape:

- *Information about areas recognised by statute such as National Parks, Areas of Outstanding Natural Beauty etc;*
- *Information about Heritage Coasts, where relevant;*
- *Local planning documents for local landscape designations;*
- *Information on individual or groups of features such as conservation areas, listed buildings, special historic or cultural sites;*
- *Art and literature identifying value attached to particular areas or views;*
- *Material on landscape of local or community interest.*

3.4.5 The following factors can also contribute to understanding the value of landscape:

- *Landscape quality (condition);*
- *Scenic quality;*
- *Rarity;*
- *Representativeness;*
- *Conservation interest;*
- *Recreation value;*
- *Perceptual aspects;*
- *Cultural Associations.*

Table 03: Criteria for Assessing Landscape Value

High Value	Landscapes which: <ul style="list-style-type: none">• <i>have existing, recognised national or local designations;</i>• <i>are judged to have scenic / wildness / tranquil qualities;</i>• <i>have cultural heritage features or cultural / artistic associations;</i>• <i>are not designated but which are assessed as being intact and in good condition;</i>• <i>are particularly representative of a typical landscape character;</i>• <i>have specific landscape components which are identified as being important to the landscape character.</i>
Low Value	Landscapes where: <ul style="list-style-type: none">• <i>the character is assessed to be in poor condition;</i>• <i>key characteristics such as scenic quality / cultural heritage features / wildness or tranquillity / rarity are absent;</i>• <i>cultural / artistic associations are not in evidence.</i>

3.5 Magnitude of Landscape Effects

3.5.1 GVLIA3 states: *Each effect on landscape receptors is assessed in terms of size or scale, geographical extent of the area influenced and its duration and reversibility.*

- 3.5.2 For the purposes of this report the magnitude of landscape effects in relation to the size or scale of the change is expressed as *major, moderate, minor, or none*. The size or scale of change in the landscape is judged in terms of:
- *The extent of existing landscape components that will be lost;*
 - *The degree to which perceptual or aesthetic aspects of the landscape are changed - either by the removal or the addition of components;*
 - *Whether the effect changes the key characteristics of the landscape character.*
- 3.5.3 The geographical extent over which the landscape would be changed is categorised as:
- *At the site level – within the development site itself;*
 - *At the level of the immediate setting of the site;*
 - *At the scale of the landscape type or character area within which the proposal lies;*
 - *On a larger scale – influencing several landscape types or character areas.*
- 3.5.4 The duration and reversibility of the proposed development are separate but linked. The duration of the proposed development would be considered in relation to the expected life span of the scheme and is expressed as:
- *Short term: zero – five years;*
 - *Medium term: five – ten years;*
 - *Long term: ten – thirty years;*
 - *Permanent: greater than thirty years.*
- 3.5.5 The reversibility of the scheme would consider the practicality of the change being reversed within thirty years.

3.6 Assessment of Visual Effects

- 3.6.1 The assessment of visual effects describes the changes in the character of the available views as a result of the development proposals and the change in visual amenity available to visual receptors. Predicting the overall degree of visual effects is based on an assessment of the sensitivity of the visual receptor combined with the magnitude of effect.
- 3.6.2 Viewpoint locations are selected as objectively as possible with the aim of providing a range of representational views which will demonstrate long-distance, medium distance and near distance views (where possible and appropriate) of the proposed development site.

3.7 Sensitivity and Susceptibility to Change of Visual Receptors

- 3.7.1 The sensitivity of visual receptors is dependent on location, importance of view and expectation or activity of viewer. The overall sensitivity of a visual receptor is

assessed by combining the susceptibility to change with the value of the view.
Overall sensitivity is expressed on a scale of *High*, *Medium* or *Low*.

Table 04: Criteria for Assessing Visual Sensitivity	
High Sensitivity	<ul style="list-style-type: none">• <i>Visual receptors in residential properties with open views of the proposed development site;</i>• <i>High quality views experienced by many visual receptors;</i>• <i>A view which is valued nationally for its visual / scenic quality.</i>
Low Sensitivity	<ul style="list-style-type: none">• <i>A view of low importance or value with little scenic quality;</i>• <i>A view from a landscape which has little value and existing, detracting features;</i>• <i>Glimpsed or intermittent views from highways;</i>• <i>A view available to few visual receptors.</i>

3.7.2 For the purposes of this report the susceptibility to change is expressed as *High*, *Medium* or *Low*. The visual receptors most susceptible to change and therefore with a susceptibility to change likely to be *High* could be:

- *Residents at home;*
- *Views experienced by many viewers;*
- *Recreational walkers whose attention or interest is likely to be focused on landscape and the available views;*
- *Visitors to heritage assets where views form an important part of the experience.*

3.7.3 The susceptibility to change of visual receptors travelling on road, rail or other transport routes would tend to fall into the *Low / Medium* category however if the route were to feature recognised scenic views then *High* may be more appropriate.

3.7.4 Visual receptors likely to be less concerned with change and therefore with a susceptibility to change assessed to be *Low* could include:

- *People engaged in sport or external activities where views are less likely to be appreciated;*
- *Intermittent or glimpsed views from transport routes;*
- *Workers where attention is likely to be focused on an activity not connected with the surroundings.*

3.7.5 Judgements on the value of the selected viewpoints are expressed as *High*, *Medium* or *Low* and assessing the value attached to a view takes account of:

- *The nature of the view eg a panoramic view of open countryside from an elevated location as opposed to a constrained urban viewpoint;*
- *Recognition of the value of views eg. scenic viewpoints within Areas Of outstanding Natural Beauty;*
- *Viewpoints where the views have been noted on maps, guidebooks, websites etc.*

3.8 Magnitude of Visual Effects

- 3.8.1 Each of the visual effects identified is assessed with regard to size or scale, geographical extent and where appropriate duration / reversibility:
- 3.8.2 The magnitude of visual effects in relation to the size or scale of the change is expressed as *major, moderate, minor, or none*. The size or scale of change in the view is judged in terms of:
- *The degree of the loss or addition of features in the view;*
 - *The extent of the changes in the view, including the proportion of the view occupied by the proposed development;*
 - *The degree of contrast or integration of the changes with the existing or remaining landscape elements and characteristics;*
 - *The nature of the view of the proposed development, whether full, partial or glimpsed, or the relative amount of time over which it will be experienced.*
- 3.8.3 The geographical extent of the visual effects is concerned with an assessment of:
- *the angle of the view;*
 - *the distance involved;*
 - *the extent of the area over which the change would be visible.*
- 3.8.4 The duration and reversibility of the proposed development are separate but linked. The duration of the development would be considered in relation to the expected life span of the development scheme and is expressed as:
- *Short term: zero – five years;*
 - *Medium term: five – ten years;*
 - *Long term: ten – thirty years;*
 - *Permanent: greater than thirty years.*
- 3.8.5 The reversibility of the scheme would consider the practicality of the change being reversed within thirty years.

3.9 Overall Degree of Landscape and Visual Effects

- 3.9.1 The overall degree of landscape and visual effects are assessed by combining the separate judgements of sensitivity and the magnitude of effects on landscape and visual receptors. Table 05 defines and describes the range of landscape and visual effects which can be expressed as adverse, beneficial or neutral.

Table 05: Overall Degree of Landscape and Visual Effects: Definitions and Descriptions

NEUTRAL	
No Change	<ul style="list-style-type: none"> • <i>No part of the development would be discernible;</i> • <i>There would be no effect within the context of the existing landscape;</i> • <i>The development proposals would be appropriate to the existing landscape scale, character, pattern and quality of the existing landscape resource.</i>
Negligible	<ul style="list-style-type: none"> • <i>Only a very small part of the development would be discernible; There would be little effect within the context of existing landscape character.</i>
ADVERSE	
Low / Slight	<ul style="list-style-type: none"> • <i>The proposals would constitute only a minor component within the existing landscape character;</i> • <i>Awareness of the proposals would not have a marked effect upon the existing landscape quality, pattern and landform.</i>
Moderate	<p><i>The Proposals would:</i></p> <ul style="list-style-type: none"> • <i>form a visible and recognisable new element within the existing landscape;</i> • <i>negatively affect the existing landscape character.</i>
Substantial	<p><i>The proposals would:</i></p> <ul style="list-style-type: none"> • <i>form a significant part of the existing landscape;</i> • <i>be unable to be fully mitigated;</i> • <i>substantially and negatively affect an existing high quality landscape.</i>
Severe	<p><i>The proposals would:</i></p> <ul style="list-style-type: none"> • <i>become a dominant feature within a high quality landscape;</i> • <i>be entirely inappropriate to the existing landscape pattern, scale and landform;</i> • <i>permanently degrade or damage the existing landscape.</i>
BENEFICIAL	
Low / Slight	<p><i>The proposals would:</i></p> <ul style="list-style-type: none"> • <i>improve the landscape quality and character;</i> • <i>be appropriate to the landscape scale, quality and pattern;</i> • <i>provide some restoration of lost or degraded landscape features.</i>
Moderate	<p><i>The proposals would:</i></p> <ul style="list-style-type: none"> • <i>Integrate very well within the existing landscape character;</i> • <i>Improve the overall landscape quality through restoration of missing or degraded landscape features due to other uses or neglect.</i>

3.10 Field Survey Methodology and Viewpoint Images

3.10.1 The on-site survey visit was carried out by Andrew Ramsay BA (Hons) MALA CMLI on the 23rd of June 2016 and was conducted from Public Rights of Way and Public Highways surrounding the proposed development site area – weather conditions were generally overcast with occasional brighter spells. It should be noted the site survey was conducted during Summer when the vegetation was in leaf - views would be more open during late Autumn, Winter and early Spring when deciduous vegetation would be out of leaf.

3.10.2 The photographs were all taken with a Canon Power Shot G11 digital camera with a 6.1 - 30.5 mm (35mm equivalent: 28-140mm) lens. The photographs were taken on a standard setting approximately 1.5 - 1.7m above ground level.

Zone of Theoretical Visibility

3.10.3 The ZTV is the area from within which the proposed development is anticipated to be visible. It is mapped by means of desktop research which is then refined and clarified with on-site investigations – refer to: *Section 7.4 Visual Effects* and *RCo180 / Figure 01 / PROW and Viewpoint Locations*.

4.0 PLANNING POLICY CONTEXT

4.1 National Planning Policy Context

4.1.1 Ramsay & Co have undertaken a desk top study assessment of the relevant planning policy designations and existing statutory landscape designations surrounding the proposed development site area. This desktop study has been undertaken at a national and local planning level.

4.1.2 The National Planning Policy Framework (NPPF) was published by the Government on 27th March 2012 and came into immediate effect. The NPPF has introduced a presumption in favour of sustainable developments. The framework has reaffirmed that planning applications should be determined in accordance with the current Development Plan for the District unless material considerations indicate otherwise. Paragraph 14 of the National Planning Policy Framework states the following: *At the heart of the planning system is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development and approve all individual proposals wherever possible. Local planning authorities should:*

- *prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes;*
- *approve development proposals that accord with statutory plans without delay.*

- 4.1.3 The NPPF promotes sustainable development through the enhancement and protection of biodiversity and the conservation of landscape character within Areas of Outstanding Natural Beauty. The framework also seeks to protect and maintain Protected Species, valuable ecological habitats and the protection of Heritage Assets. Local Planning Authorities are required to implement the policies of the framework within the LPA Development Plans and development control decision making process.

4.2 District Planning Policy

- 4.2.1 Ramsay & Co have undertaken a desk top study assessment of the relevant Mid Sussex District Council (MSDC) Local Planning Policies and Statutory Landscape Designations surrounding the proposed development site area. The relevant MSDC and statutory planning policy designations are illustrated in: *RCo180 / Figure 02 / Landscape and Planning Policy Designations*.
- 4.2.2 Local planning policies are contained within the Mid Sussex Local Plan which was adopted on May 27th 2004 and is part of the development plan for Mid Sussex: *The Plan sets out policies and specific proposals for the development and use of land to guide planning decisions. In September 2007 the Government Office for the South East (GOSE) confirmed that the majority of policies within the adopted Mid Sussex Local Plan have been saved. These policies have been saved indefinitely. In practice this means that the majority of policies are saved until replaced by policies within a future Development Plan Document, in which case the Development Plan Document will clearly set out which Local Plan policies it replaces.*
- 4.2.3 The new District Plan is due to be adopted in Winter 2016 and will be: *the main planning document used by the Council when considering planning applications. It will cover the period to 2031 and includes the strategy, proposed level of development and a number of planning policies.*

Mid Sussex Local Plan: Policy C1

- 4.2.4 The proposed development site lies outwith of any designated built up area and is therefore designated in the Mid Sussex Local Plan as being covered by *Policy C1: Outside built-up area boundaries, as detailed on the Proposals and Inset Maps, the remainder of the plan area is classified as a Countryside Area of Development Restraint where the countryside will be protected for its own sake. Proposals for development in the countryside, particularly that which would extend the built-up area boundaries beyond those shown will be firmly resisted and restricted to:*
- (a) proposals reasonably necessary for the purposes of agriculture or forestry;*
 - (b) proposals for new uses in rural buildings of a scale consistent with the building's location;*
 - (c) in appropriate cases, proposals for the extraction of minerals or the disposal of waste;*
 - (d) in appropriate cases, proposals for quiet informal recreation and/or tourism related developments;*

- (e) proposals for facilities which are essential to meet the needs of local communities, and which cannot be accommodated satisfactorily within the built-up areas;*
- (f) proposals for which a specific policy reference is made elsewhere in this Plan; and*
- (g) proposals which significantly contribute to a sense of local identity and regional diversity.*

Mid Sussex Local Plan: Policy C4

- 4.2.5 The proposed development site lies within the High Weald Area of Outstanding Natural Beauty. Within the Local Plan it states: *Within the Sussex Downs and High Weald Areas of Outstanding Natural Beauty, as shown on the Proposals Map and its Insets, the aim to conserve and enhance natural beauty is regarded as the overall priority. Proposals for development will be subject to the most rigorous examination and only those which comply with this aim will be permitted. Development will not be permitted in the Sussex Downs and High Weald Areas of Outstanding Natural Beauty, unless:*

- (a) it is reasonably necessary for the purposes of agriculture or some other use which has to be located in the countryside;*
- (b) it is essential for local social and / or economic needs; or*
- (c) it can be demonstrated that the development would be in the national interest and that no suitable sites are available elsewhere.*

In considering development proposals within or immediately adjacent to the AONB, including those regarded as exceptions, particular attention will be paid to the siting, scale, design, external materials and screening of new buildings that are proposed in order to ensure that they enhance, and do not detract from, the visual quality and essential characteristics of the area.

Mid Sussex Local Plan: Policy C5

- 4.2.6 There are a number of areas surrounding the proposed development site which have statutory designations. An area of woodland to the north-west of Jeffrey's Farm, *Parson's Wood* is designated as Ancient Replanted Woodland. To the south of the proposed development site area, *Coneyborough Wood* is also designated as Ancient Woodland. The nearest Site of Special Scientific Interest is located approximately 1.0km to the south and the southern end of an area designated as a Site of Nature Conservation Importance lies approximately 1.4km to the north west of the proposed development site area.
- 4.2.7 Within the Mid Sussex Local Plan it states: *Proposals for development or changes of use of management within Sites of Special Scientific Interest, Sites of Nature Conservation Importance, Local Nature Reserves, Ancient Woodlands or to other sites or areas identified as being of nature conservation or geological importance, including wildlife corridors will be subject to rigorous examination, and only permitted where the proposal, by virtue of design and layout, minimises the impact on features of nature conservation importance. Proposals should take advantage of opportunities for habitat creation wherever possible. The weight to be attached to*

nature conservation interests will reflect the relative significance of designations. Special scrutiny will be applied to those sites which are statutorily designated.

- 4.2.8 Policy C6 also states: *Development resulting in the loss of woodlands, hedgerows and trees which are important in the landscape, or as natural habitats, or historically, will be resisted.*

Mid Sussex Local Plan: Policy B10

- 4.2.9 Immediately to the north of the proposed development site area are *Ludwell Grange* and *Ludwell* - both of which are listed by Historic England. To the east of Jeffrey's Farm and Sugar Lane: *Boxes Farmhouse* is also a listed building. Policy B10 states: *Listed Buildings and their settings will be protected. Other than in exceptional circumstances, the following will apply:.....*
(d) In considering new proposals, special regard will be given to protecting the setting of a listed building and the use of appropriate designs and materials.

Mid Sussex Local Plan: Policy B12 and B15

- 4.2.10 Approximately 280.0m to the east of the proposed development site lies an area within Horsted Keynes which is designated as a Conservation Area. Within the Local Plan Policy B12 states: *The protection of the special character and appearance of each Conservation Area will receive high priority. When determining planning applications for development within or abutting the designated Conservation Areas, special attention will be given to the desirability of preserving or enhancing the character or appearance of the area and to safeguard the setting of any Listed Building.....*
- 4.2.11 Policy B15 goes on to mention: *Development affecting the setting of a Conservation Area should be sympathetic to, and should not adversely affect its character and appearance. In particular, attention will be paid to the protection or enhancement of views into and out of a Conservation Area, including, where appropriate, the retention of open spaces and trees.*

Mid Sussex Local Plan: Policy CS15

- 4.2.12 Jeffrey's Farm lies approximately 370.0m to the south east of an area which is designated as a floodplain. Within the Local Plan Policy RA5 states: *Planning permission will not be granted for development (including redevelopment and intensification of existing development) in areas at risk of flooding or for land raising within river floodplains unless environmentally acceptable flood mitigation measures to protect the floodplain can be provided by the developer to compensate for the impact of the development.....*

Mid Sussex Local Plan: Policy B18

- 4.2.13 The proposed development site lies approximately 1.4km to the south-east of an area which is designated as a Scheduled Ancient Monument. Within the Local Plan it states: *Sites of archaeological interest and their settings will be protected and enhanced where possible. In particular, the fabric and setting of Scheduled Ancient*

Monuments and other nationally important archaeological sites should be preserved intact.

Mid Sussex Local Plan: Policy R14

- 4.2.14 An area which is designated as the *Bluebell Railway Extension* lies approximately 1.37km from the proposed development site area. Within the Local Plan it states: *The line of the Bluebell Railway is shown on the Local Plan Proposals Maps and will be safeguarded from any development which could prevent its completion. Proposals for additional development associated with the Bluebell Railway will only be permitted where the Local Planning Authority is satisfied that such development would have no significant adverse impact on the environment such as through visual intrusion, excessive traffic generation, noise and disturbance or loss of amenity to neighbouring residential properties. Proposals for the opening or re-opening of further stations or stopping places will be subject to particularly close examination.*

- 4.2.15 Policy HK3 goes on to state: *Proposals for additional development associated with the Bluebell Railway at Horsted Keynes will be permitted where the Council is satisfied that such development would have no significant adverse impact on the environment through visual intrusion, excessive traffic generation, noise and disturbance or loss of amenity to neighbouring residential properties.*

4.3 Local Planning Policy

- 4.3.1 Horsted Keynes Parish Council have recently produced a draft Neighbourhood Plan which having undergone a period of public consultation was due to be submitted to Mid Sussex District Council by the 15th of June 2016 for a further period of consultation before being assessed by an independent examiner.

Draft Horsted Keynes Neighbourhood Plan - Policy HK1: Built Up Area Boundary
4.3.2 The draft Neighbourhood Plan contains a number of policies which relate to the proposed development site area. Policy HK1 states: *New residential development in Horsted Keynes parish shall be contained within the built-up area boundary of Horsted Keynes village as identified on the Proposal Map.*

Development proposals will be permitted within the built-up area boundary subject to compliance with other policies in this Neighbourhood Plan. Development proposals outside the built-up area boundary will not be permitted unless:

- *they represent development proposals on the site allocations, HK18 to HK20; and*
- *they comply with Policy C1 of the Mid Sussex District Plan 2004; or*
- *they relate to necessary utilities infrastructure and where no reasonable alternative location is available: or*
- *they comply with other policies in this Neighbourhood Plan in particular those relating to dwelling extensions and business premises.*

Draft Horsted Keynes Neighbourhood Plan - Policy HK7: Minimise the Environmental Impact of New Developments

- 4.3.3 Policy HK7 states: *New developments shall maximise the retention of well-established features of the landscape including mature trees, hedgerows and ponds. Where the loss of such features cannot reasonably be avoided the development shall include for their full replacement by similar or equivalent features elsewhere on the site.*

Draft Horsted Keynes Neighbourhood Plan - Policy HK8: Protection and Improvement of Natural Habitats

- 4.3.4 The Draft Neighbourhood Plan also makes provision for the protection and improvement of natural habitats: *New developments shall provide for the protection and enhancement of existing habitats of any flora and fauna on the site. Where damage to natural habitat cannot reasonably be avoided, measures shall be taken which will ensure that damage is minimised and the habitat affected can continue to thrive.*
Where the destruction of natural habitat cannot reasonably be avoided, the development shall provide suitable compensation measures that allow for the creation of new habitats off-site.

Draft Horsted Keynes Neighbourhood Plan - Policy HK19: Land At Jeffrey's Farm

- 4.3.5 Policy HK19 refers specifically to Jeffrey's Farm: *Residential development for approximately 6 dwellings on 0.7 hectares of land at Jeffrey's Farm will be permitted subject to the following criteria:*
- *the development is on the land currently occupied by the farm buildings; and*
 - *the development is designed in a courtyard style or equivalent to ensure that there is no potential to extend development further in the future; and*
 - *suitable landscaping is provided to protect the views from the west.*

National Planning Policy Framework: Public Rights Of Way

- 4.3.6 There are no Public Rights of Way (PROW) either within or adjacent to the proposed development site area. The nearest designated Public Right of Way is a Footpath which lies to the south-east of the proposed development site area and runs east off Lewes Road along Hamsland. To the south of Jeffrey's Farm, a PROW: Footpath runs south off Treemans Road to the north of Old Keysford Hall before turning through ninety degrees (to the north of Old Keysford Hall) and heading west.
- 4.3.7 Public Rights of Way are indicated on RCo180 / Figure 01 / Viewpoint locations and ZTV.

5.0 EXISTING BASELINE CONDITIONS

5.1 Landscape Context

- 5.1.1 The residential scheme proposes a mix of residential dwellings including apartments, bungalows, semi-detached dwellings and detached houses which would be located to a field south of Keysford Lane to the north-western edge of Horsted Keynes. Several residential units would replace dilapidated agricultural buildings, barns and storage containers to the west of the Jeffrey's Farm area. A proposed access road would run west off Sugar Lane from a location slightly north of Jefferies and head north before curving around to the western edge of the Jeffrey's Farm area.
- 5.1.2 Jeffrey's Farm lies to the west of Horsted Keynes and comprises a number of agricultural buildings (some of which are derelict and dilapidated), storage containers and a farm house which was sold to a third party some years ago. The farm is reached by means of a narrow access track off the northern end of Treemans Road and is lined with mature trees and shrubs – to the south of the track are several residential dwellings. Jeffrey's Farm is currently home to a small herd of beef cows but primarily produces and sells chicken eggs. The field to the west of Sugar Lane and immediately south of Keysford Lane is currently given over to equestrian grazing and there are two, small stable buildings.
- 5.1.3 To the eastern edge of the proposed development site lies Sugar Lane and to the northern edge is Keysford Lane. Residential properties lie to the east of Sugar Lane forming the western, urban edge of Horsted Keynes whilst the landscape to the north of Keysford Lane is rural in character with woodland blocks and agricultural fields. To the west are grassland fields which are delineated with hedgerows and trees – a farm lies to the southern edge of Keysford Lane: *Tyhurst*.
- 5.1.4 To the south of Jeffrey's Farm are agricultural fields and a large woodland block - there are residential dwellings to the eastern and western edges of Treemans Road.

5.2 Proposed Development Site: Baseline Topography

- 5.2.1 The proposed development site area is characterised by a gradual fall to the northern boundary and Keysford Lane. To the east of Jeffrey's Farm, a grassland field extends to Sugar Lane and the levels gradually fall towards the vegetated northern boundary - Sugar Lane (to the south and immediately north of Jefferies) is of a similar level to the grassland field. Further east the topography over the urban environment of Horsted Keynes is fairly even.

- 5.2.2 To the south of the farm area, the topography is generally even with only minor variations in levels although there is a distinct fall to the south west towards the Bluebell Railway line.
- 5.2.3 To the west of the proposed development site area, the topography is more undulating in nature and there is a fall to the Bluebell Railway line before the topography rises again creating a valley.
- 5.2.4 To the north of Jeffrey's Farm, there is a noticeable fall in levels towards the dense tree belt which lies to the northern edge of the proposed development site area (adjacent to Keysford Lane). This fall extends to Sugar Lane with an appreciable climb heading south from the junction with Keysford Lane. Sugar Lane is also at a lower level than the proposed development site area ie. in cutting with a steep bank to part of the highway leading to dense woodland. Further north the topography is more even.

5.3 Existing Vegetation

- 5.3.1 The proposed development site is characterised by mature trees and dense shrubs to the field boundary edges. To the north-eastern boundary (adjacent to Sugar Lane) is a dense belt of shrubs and trees some of which have developed into very large and mature specimens. Further south (to the eastern boundary) are several large and mature tree specimens with dense shrub and ruderal underplanting. To the northern boundary is a dense strip of tree specimens which are a mix of coniferous and deciduous species - an informal hedgerow (comprising mainly Hazel and Holly) lies to the southern boundary of Keysford Lane.
- 5.3.2 To the western boundary is a hedgerow which has not been pruned and has therefore developed into more of a small tree line. The farm area is delineated with dense trees and shrubs which in part lie to the garden edge of the farmhouse. There are also a number of trees within the farm area which are likely to have self-seeded – several lie in very close proximity to existing, agricultural buildings. Two very large and mature Oaks lie in close proximity to an agricultural building to the east of the farm area.
- 5.3.3 The access road to the southern boundary is edged with mature trees to the north and a mix of dense shrubs and mature trees to the southern edge.

5.4 National Landscape Character: Natural England – National Character Areas Profile (122): High Weald

- 5.4.1 The top tier of landscape character assessments is the National Countryside Character assessment comprising of 8 Regional Volumes which are subdivided into 159 distinct, natural areas.

- 5.4.2 The proposed development site lies within Volume 7: South East and London and is located to the west of National Character Area Profile (122): High Weald which: *encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. It is an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe. The High Weald Area of Outstanding Natural Beauty (AONB) covers 78 per cent of the NCA. The High Weald consists of a mixture of fields, small woodlands and farmsteads connected by historic routeways, tracks and paths. Wild flower meadows are now rare but prominent medieval patterns of small pasture fields enclosed by thick hedgerows and shaws (narrow woodlands) remain fundamental to the character of the landscape.*
- 5.4.3 The relevant key characteristics of the NCA - High Weald - National Character Area are summarised below (those particularly relevant to the site and surrounding area are highlighted in **bold**):
- *High density of extraction pits, quarries and ponds, in part a consequence of diverse geology and highly variable soils over short distances;*
 - *A dispersed settlement pattern of hamlets **and scattered farmsteads and medieval ridgetop villages** founded on trade and non-agricultural rural industries, with a dominance of timber- framed buildings with steep roofs often hipped or half-hipped, and an extremely high survival rate of farm buildings dating from the 17th century or earlier;*
 - *Ancient routeways in the form of ridgetop roads and a dense system of radiating droveways, often narrow, deeply sunken and edged with trees and wild flower-rich verges and boundary banks. Church towers and spires on the ridges are an important local landmark. **There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips.** The area includes several large towns such as Tunbridge Wells, Crowborough, Battle and Heathfield and is closely bordered by others such as Crawley, East Grinstead, Hastings and Horsham;*
 - ***An intimate, hidden and small-scale landscape** with glimpses of far reaching views, giving a sense of remoteness and tranquillity yet concealing the highest density of timber-framed buildings anywhere in Europe amidst lanes and paths;*
 - *Strong feeling of remoteness due to very rural, wooded character. **A great extent of interconnected ancient woods,** steep-sided gill woodlands, wooded heaths and shaws in generally small holdings with extensive archaeology and evidence of long-term management;*
 - ***Extensive broadleaved woodland cover with a very high proportion of ancient woodland with high forest, small woods and shaws,** plus steep valleys with gill woodland;*
 - ***Small and medium-sized irregularly shaped fields enclosed by a network of hedgerows and wooded shaws, predominantly of medieval origin and managed historically as a mosaic of small agricultural holdings typically used for livestock grazing;***

- A predominantly **grassland agricultural landscape grazed mainly with sheep and some cattle**;
- There is a strong influence of the Wealden iron industry which started in Roman times, until coke fuel replaced wood and charcoal. There are features such as a notably high number of small hammer ponds surviving today.
- **An essentially medieval landscape reflected in the patterns of settlement, fields and woodland.**

5.5 The High Weald Area of Outstanding Natural Beauty Management Plan (2014-2019)

- 5.5.1 The proposed development site is located within the High Weald Area of Outstanding Natural Beauty (AONB) and the High Weald AONB Management Plan is the document in which the local authorities with land in the AONB set out: *their policy for the management of the area and for the carrying out of their functions in relation to it*. The plan states: *The primary purpose of AONB designation is to conserve and enhance natural beauty however In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.*
- 5.5.2 The management plan goes on to describe the High Weald as: *a historic countryside of rolling hills draped by small irregular fields, abundant woods and hedges, scattered farmsteads and sunken lanes. It covers 1461 sq km across four counties and 11 districts. The High Weald was designated an Area of Outstanding Natural Beauty (AONB) in 1983.*
- 5.5.3 The document continues: *Woodland is extensive covering nearly a third of the area in an intricate network of small wooded shaws, pits and gills; farm woods and larger wooded estates. Most of the woodland is ancient, managed in the past as coppice and swept with bluebells and wood anemones in the spring but of the mature oaks for which the Weald was once famous, few remain.....*
- 5.5.4 The management plan identifies five main components which combine to create the: *distinctive pattern and form the fabric of the landscape we see today*:
- **Geology, landform, water systems and climate:** *Deeply incised, ridged and faulted landform of clays and sandstone. The ridges tend east-west, and from them spring numerous gill streams that form the headwaters of rivers. Wide river valleys dominate the eastern part of the AONB. The landform and water systems are subject to, and influence, a local variant of the British sub-oceanic climate;*
 - **Settlement:** *dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries;*

- **Routeways:** *ancient routeways (now roads, tracks and paths) in the form of ridge-top roads and a dense system of radiating droveways. These routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks;*
- **Woodlands:** *the great extent of ancient woods, gills, and shaws in small holdings, the value of which is inextricably linked to long-term management;*
- **Field and Heath:** *small, irregularly shaped and productive fields often bounded by (and forming a mosaic with) hedgerows and small woodlands, and typically used for livestock grazing; small holdings; and a non-dominant agriculture; within which can be found distinctive zones of heaths and inned river valleys.*

5.5.5 Within the management plan it states: *The AONB Management Plan complements but does not duplicate the development plans of constituent local planning authorities. It does not itself propose policy to address development issues. Instead it sets out a 'criteria-based' framework (the objectives and indicators of success for conserving and enhancing natural beauty) against which the impact of development on the purpose of designation can be assessed.*

5.6 Regional Landscape Character: Landscape Character Assessment of West Sussex (2003) – HW1: High Weald

5.6.1 In 2003, West Sussex County Council completed a landscape character assessment which identified 42 no separate and unique landscape character areas. Land Management Guidelines were produced for each area which were intended to provide a resource for landowners, managers, district councils, parish, town and borough councils, other organisations and members of the public.....

5.6.2 The proposed development site area lies within *HW1: High Weald* which is described as being: *The High Weald Forest Ridge within West Sussex. Numerous gill streams have carved out a landscape of twisting ridges and secluded valleys. The ancient, densely wooded landscape of the High Weald is seen to perfection in the area.....*

5.6.3 The key characteristics of HW1: High Weald landscape character area are summarised below with those particularly relevant to the proposed development site and surrounding area in **bold**:

- *Plateau, ridges and deep, secluded valleys cut by gill streams. Headwater drainage of the Rivers Eden, Medway, Ouse and Mole;*
- *Long views over the Low Weald to the downs, particularly from the high Forest Ridge;*
- *Includes major reservoir at Ardingly and adjoins Weir Wood Reservoir.*
- ***Significant woodland cover, a substantial portion of it ancient, and a dense network of shaws, hedgerows and hedgerow trees;***

- ***Pattern of small, irregular-shaped assart fields, some larger fields and small pockets of remnant heathland;***
- ***Pockets of rich biodiversity concentrated in the valleys, heathland, and woodland;***
- *Dense network of twisting, deep lanes, droveways, tracks and footpaths.*
- ***Dispersed historic settlement pattern on high ridges, hilltops and high ground, the principal settlements East Grinstead and some expanded and smaller villages;***
- *Some busy lanes and roads including along the Crawley–East Grinstead corridor;*
- *London to Brighton Railway Line crosses the area;*
- *Mill sites, hammer ponds and numerous fish and ornamental lakes and ponds;*
- ***Varied traditional rural buildings built with diverse materials including timber-framing, Wealden stone and varieties of local brick and tile hanging;***
- *Designed landscapes and exotic treescapes associated with large country houses;*
- *Visitor attractions include Wakehurst Place, Nymans Gardens, the South of England Showground and the **Bluebell Line Steam Railway.***

5.7 District Landscape Character - A Landscape Character Assessment For Mid Sussex (2005): High Weald

5.7.1 In November 2005, Mid Sussex District Council published a district wide landscape character assessment which was prepared: *to help protect and enhance the distinctive character of the District and to manage change.* The proposed development site lies within the Landscape Character Area 6 – High Weald which covers approximately 11,408 hectares and is:....*the largest Landscape Character Area in Mid Sussex, contains the highest ground in the High Weald within West Sussex and lies wholly within the District and the High Weald Area of Outstanding Natural Beauty (AONB).....*

5.7.2 Many of the key landscape characteristics identified within the Landscape Character Assessment of West Sussex (2003) - HW1: High Weald are repeated within the Mid Sussex - High Weald landscape character assessment. Additional landscape characteristics which are relevant to the proposed development site and surrounding area are summarised below (those applicable to the development site are highlighted in **bold**):

- ***Wooded, confined rural landscape of intimacy and complexity, perceived as attractive, locally secluded and tranquil;***
- ***Significant woodland cover, a substantial portion of it ancient, including some larger woods and a dense network of hedgerows and shaws, creates a sense of enclosure, the valleys damp, deep and secluded.***

5.8 Proposed Development Site: Landscape Character

- 5.8.1 The proposed development site landscape features and components are illustrated in Appendix A.
- 5.8.2 The proposed development site includes the western area of Jeffrey's Farm and two fields to the north and north-east of the farm area. Jeffrey's Farm comprises a number of low grade, agricultural buildings (some of which are in a state of disrepair), barns, steel shipping containers and the farm house which was sold to a third party some years ago and is therefore excluded from the proposed development site area. The farm area is slightly chaotic in appearance with derelict buildings, discarded machinery, parked vehicles, chicken wire fences and self-seeded trees combining to create an impression of visual disorder.
- 5.8.3 The fields to the north and north-east of Jeffrey's Farm are characterised by dense shrub and ruderal vegetation as well as trees (many of which are mature and large specimens) which delineate the field edges. The proposed site area is edged by Keysford Lane to the north and Sugar Lane to the east – the urban edge of Horsted Keynes lies to the east of Sugar Lane. Tranquillity is intermittently affected by the close proximity of traffic using the highways. The field immediately south of Keysford Lane is largely given over to equestrian use and therefore it is likely the grassland has little ecological value. Several residential dwellings are located to the south of the narrow access road which leads off Treemans Road to Jeffrey's Farm.
- 5.8.4 The proposed development site area is enclosed and small scale in character as a result of the dense field edge vegetation, mature trees and urban, western edge of Horsted Keynes. There are some very long distance views over existing trees to a ridge line to the north. There is a prevailing urban element to the semi-rural landscape character as a result of the close proximity to Horsted Keynes.
- 5.8.5 The main landscape receptors would be summarised by:
- *Mature tree specimens and tree / shrub belts;*
 - *Jeffrey's Farm Area: Agricultural Buildings and Storage Containers;*
 - *Equestrian outbuildings / Stables;*
 - *Overhead Telephone Wires;*
 - *Jeffrey's Farm House;*
 - *Horsted Keynes – urban edge;*
 - *Highways: Sugar Lane and Keysford Lane.*

5.9 Landscape Receptor Value

- 5.9.1 The aspects of the landscape which may be affected by the proposed residential scheme were identified from existing landscape character assessments and the site visit. The characteristics and guidelines within the landscape character assessments were considered as indicators of aspects of the landscape important to landscape character.

5.9.2 The value of the landscape character and receptors are assessed below:

- *The mature tree specimens and tree/ shrub belts to the field edge boundaries are judged to be of High value, important to landscape character and referred to within existing landscape character assessments;*
- *The Jeffrey's Farm area is assessed as being of Low value with agricultural buildings which are in a state of disrepair and storage containers which detract from the landscape and AONB setting;*
- *The overhead telephone wires and stables are assessed as being of Low value making little contribution to landscape character;*
- *Jeffrey's Farm House and garden area is assessed as being of Medium value as although not listed it makes some contribution to landscape character;*
- *Horsted Keynes urban edge is judged to have a Medium value as there is a mix of newer, less attractive buildings (around Boxes Lane and Jefferies) as well as some older buildings some of which are listed (to the northern end of Sugar Lane);*
- *Keysford Lane and Sugar Lane are assessed as being of Medium value – mentioned within existing landscape character assessments: 'dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips';*
- *The proposed development site area is judged to be of Medium value as although located within the High Weald AONB it is in close proximity to two highways and Horsted Keynes urban edge is prominent. The farm area comprises a number of low grade agricultural buildings some of which are derelict and there are several elements which detract from the landscape setting including stables, electric fencing, storage containers and overhead telephone wires.*

5.10 Visual Baseline: Potential Visual Receptors

Residential Receptors

5.10.1 To the east of the proposed development site is Sugar Lane which forms the western edge of Horsted Keynes and there are a number of properties which lie to the eastern edge of this highway. To the northern end of Sugar Lane, views of the proposed development site area are limited by the dense tree and shrub belt which lies to the western edge of Sugar Lane and south of Keysford Lane. Further south, views of the southern field which forms the proposed development site area (where the proposed access road and community building would be located) are more open although mature trees limit perceptibility – there would be views of the proposed access road entrance off Sugar Lane from residential properties to the western end of Jefferies. Views from the properties to the south of the existing Jeffrey's Farm access track are limited by dense shrubs and mature trees.

5.10.2 Within the wider landscape, views of the proposed development site are constrained by the dense vegetation which delineates the field edge boundaries.

Views from Jeffrey's Farm House would be limited by the dense and mature vegetation which lies to the garden boundary.

Recreational Users

- 5.10.3 Views of the proposed development site area from locations to Public Rights of Way are limited by the dense shrubs and mature tree specimens which lie to the field edge boundaries.

Agricultural Workers

- 5.10.4 Any views of the proposed development site area from adjacent fields would also be limited by the mature shrubs and trees which lie to the field boundaries – partial views would be limited to gaps in the vegetation. There would be some views from part of the field which lies immediately west of the Jeffrey's Farm area.

Road Users

- 5.10.5 Views of the proposed development site area from locations to Keysford Lane and Sugar Lane would be limited by the dense trees and shrubs which lie to the eastern and northern boundaries of the proposed development site area. Occasional gaps may allow fleeting, glimpsed views of the proposed development site area. Sugar Lane and Keysford Lane do not have a dedicated pedestrian path / pavement meaning pedestrian use is likely to be minimal. To the south of Sugar Lane, views west to the southern field which forms the proposed development site area would be slightly more open however mature trees and shrubs would limit the perceptibility of the proposed access road and community building.

5.11 Visual Analysis: Representational Viewpoints

- 5.11.1 This section of the report provides an analysis of the existing visual condition. A range of key viewpoints has been selected to demonstrate the views available of the proposed development site area and also viewpoints which demonstrate a lack of visibility due to the prevailing topography and/or intervening vegetation. Views are shown in *Appendix B: Viewpoint Photographs*.

Viewpoint 01 – PROW: Footpath South of Bennetts Looking North

- 5.11.2 This viewpoint is located approximately 300.0m to the south of the proposed development site area on a PROW: Footpath and looks north. To the right of the image is a single storey, residential development: *Bennetts* which is located to the south of a row of detached houses which lie to the western edge of Treemans Road. To the north is a mature tree and shrub belt which lies to the field edge boundary. There is a partial, long distance view of an agricultural building which is located to the western edge of the Jeffrey's Farm area – further north are limited views of the topography as it rises in the distance.

Viewpoint 02 – PROW: Footpath Looking North

- 5.11.3 Viewpoint 02 looks north from a location to a PROW: Footpath which lies to the south of a tree and shrub belt approximately 380.0m from the proposed

development site. The viewpoint lies on an unmade farm track and *Old Keysford Hall* lies to the south east. Views north are limited by the mature trees and shrubs which are located to the field edge. Whilst there are clear views of the residential dwellings which lie to the west of Treemans Road, the Jeffrey's Farm area and associated agricultural buildings are not perceptible in views from this location as a result of intervening vegetation.

Viewpoint 03 – Keysford Lane Looking North-East

- 5.11.4 This viewpoint lies on a location to Keysford Lane adjacent to a residential dwelling: *High Beeches* and the entrance to Woodland Farm. The viewpoint is located approximately 1.70km to the south-west of the proposed development site area and the elevated location allows for panoramic views over the landscape to the east. The view demonstrates the undulating, wooded nature of the landscape and the long distance views which are available from elevated and isolated locations. Tranquillity is intermittently affected by the close proximity of traffic to Keysford Lane and there are partial, long distance views of isolated buildings within the landscape. The perceptibility of the proposed development site area and Jeffrey's Farm is constrained by distance and intervening vegetation.

Viewpoint 04 – PROW: Footpath off Keysford Lane Looking East

- 5.11.5 Viewpoint 04 lies to the north of Keysford Lane approximately 850.0m from the proposed development site area and looks east across the Bluebell Railway Line - a bridge which crosses the railway track is partially visible to the centre of the image. The proposed development site area is hidden from view in this location by a combination of the rising topography and intervening, mature vegetation. To the centre of the image, the PROW: Footpath (which also provides access to Nobles Farmhouse to the north-west) is clearly visible heading south to Keysford Lane and the dense woodland which lies to the southern edge of the highway is also perceptible. The view demonstrates the undulating nature of the landscape to the west of Horsted Keynes and the prevailing wooded character which limits views and creates a strong sense of enclosure.

Viewpoint 05 – Private Farmland off Keysford Lane Looking East

- 5.11.6 This viewpoint lies approximately 90.0m from the western boundary of the proposed development site and looks east across Keysford Lane. The location is on private farmland close to a field opening to the north of Keysford Lane. The proposed development site area is hidden in views due to the dense tree and shrub belt which lies to the northern boundary of the proposed development site area. To the left of the image, agricultural fields which lie to the north of Keysford Lane are visible and there is a partial view of Ludwell Grange to the north east.

Viewpoint 06 – Junction of Sugar Lane and Keysford Lane Looking South

- 5.11.7 This viewpoint lies approximately 70.0m to the north of the proposed development site area to the junction between Keysford Lane and Sugar Lane. The view looks south and the perceptibility of the proposed site is constrained by the large and mature trees which lie to the south of the junction. The viewpoint is located to the northern edge of Horsted Keynes and has an urban character with a

view of Ludwell Grange to the right of the image and the rooftops to properties which lie to the east of Sugar Lane also partially visible. The northern end of Sugar Lane is visible rising as it heads south to the eastern edge of the proposed development site area.

Viewpoint 07 – Boxes Lane Looking West

- 5.11.8 Viewpoint 07 lies approximately 50.0m to the east of the proposed development site area and looks west. The viewpoint is located to a slightly elevated location on Boxes Lane – a cul-de-sac which runs east off Sugar Lane. The view demonstrates the dense shrubs and mature trees which lie to the north-eastern edge of the proposed development site area as well as the steep bank which lies to the western edge of Sugar Lane which limits views west.

Viewpoint 08 – Jefferies Looking West

- 5.11.9 This viewpoint looks west from a location to the south of Viewpoints 06 and 07 and lies on Jefferies which links Sugar Lane with Lewes Road. To the right of the image is a partial view of a residential dwelling which lies to the east of Sugar Lane which can be seen to the eastern edge of the proposed development site area. The topography is more even in this view (to the south east of the proposed development site area) and the large and mature trees which characterise the western edge of Sugar Lane are visible adjacent to the highway. As with Viewpoints 06 and 07, the location of Viewpoint 08 to the western edge of Horsted Keynes is urban in character with man-made components prominent in views.

Viewpoint 09 – Treemans Road Looking North

- 5.11.10 Viewpoint 09 lies to the south of the existing access to Jeffrey's Farm and looks north along Sugar Lane – the existing farm access can be seen to the centre of the image. The view shows the residential properties which form part of the western, urban edge of Horsted Keynes and to the left of the image is a hedgerow which lies to the east of a dwelling which lies to the south of the farm access road. The view demonstrates the dense vegetation which lies to the western edge of Sugar Lane and to the south of the Jeffrey's Farm access road. The field which forms the southern part of the proposed development site area is partially visible through gaps in the vegetation to the north of the farm access track.

6.0 MITIGATION AND POTENTIAL EFFECTS

6.1 Mitigation

- 6.1.1 The proposed development scheme would seek to retain and protect existing, mature tree specimens and tree / shrub belts to the western, northern and eastern boundaries of the proposed development site area. A number of self-seeded tree specimens within the farm area would require removal due to very close proximity to existing agricultural buildings which are proposed to be demolished. Limited areas of shrubs and small trees to the boundary which separates the two fields

would be removed as well as to the north-western edge of the Jeffrey's Farm House garden area.

- 6.1.2 To the south-eastern field boundary (adjacent to Sugar Lane), a limited section of shrubs would be cleared to facilitate the proposed access road entrance. (For details of the proposed tree protection measures refer to: *RCo180 / 02a and 2b / Tree Protection Drawings* and accompanying *Existing Tree Schedule*).
- 6.1.3 The boundaries of the proposed residential development scheme would be enhanced with native hedgerows and tree specimens which would soften and filter near distance views from locations within the proposed development site area. To the south east, the proposed access road would be enhanced with tree specimens and a hedgerow to the proposed community building frontage.
- 6.1.4 Pedestrian paths to the north western, northern and southern edges would be enhanced with native tree specimens. The existing small trees / shrubs to the western boundary edge of the proposed development site area would be enhanced with a 5.0m wide buffer of native understorey shrub planting and tree specimens. To the north of the proposed residential dwellings, an extensive area of native grassland and wildflowers would be established which would enhance the development site biodiversity attracting invertebrates such as butterflies and bees.
- 6.1.5 For details of the scheme proposals refer to: *RCo180 / Fig 03 / Proposed Development and Mitigating Planting Scheme*.

6.2 Potential Effects: Construction Phase

- 6.2.1 The potential construction phase activities would involve the demolition of several Jeffrey's Farm agricultural buildings, the construction of the proposed access road and general works associated with the construction of the proposed community building and residential dwellings– these activities would be regarded as short term:
- *Demolition of several Jeffrey's Farm agricultural buildings;*
 - *Construction of access road;*
 - *Localised, general ground works;*
 - *Delivery of building materials;*
 - *General construction site activities.*

6.3 Potential Effects: Post Construction

- 6.3.1 Following completion of the proposed development scheme, potential effects would include views of the proposed residential dwellings, community building and access road: effects would be permanent.

7.0 LANDSCAPE AND VISUAL EFFECTS

7.1 Landscape Effects

- 7.1.1 This section will deal with the potential effects of the proposed development scheme on the landscape character and fabric of the development site and surrounding area.
- 7.1.2 The proposed development site area comprises agricultural buildings and steel shipping containers to the Jeffrey's Farm area – some of which would be removed to facilitate the construction of residential units. Limited areas of small trees and shrubs which delineate pasture fields would be removed to enable the construction of the access road and proposed residential units to the north and north east of Jeffrey's Farm.
- 7.1.3 A small area of shrubs to the western edge of Sugar Lane would be removed to allow the access road entrance to be constructed however mature trees would be retained and protected within the proposed development scheme. Several trees within the Jeffrey's Farm area would be removed due to close proximity to buildings proposed to be demolished.
- 7.1.4 The shrub / tree belts to the western, northern and eastern edges of the proposed development site area would be retained as would the mature tree specimens to the eastern boundary adjacent to Sugar Lane. The mature tree specimens which line the existing Jeffrey's Farm access track would also be retained and protected within the proposed development scheme.

Existing Landscape Receptors: Potential Effects

- 7.1.5 The existing landscape components which are important to the proposed development site landscape character have been identified as follows:
- *Mature tree specimens and tree/shrub belts;*
 - *Jeffrey's Farm Area: Agricultural Buildings and Storage Containers;*
 - *Equestrian outbuildings / Stables;*
 - *Overhead Telephone Wires;*
 - *Jeffrey's Farm House;*
 - *Horsted Keynes – urban edge;*
 - *Highways: Sugar Lane and Keysford Lane.*

Landscape Character: Potential Effects

- 7.1.6 Landscape character is partly derived from the combination and pattern of landscape elements within any view and therefore there is an overlap between visual amenity and landscape character.

7.2 Effects On The Landscape

Sensitivity

7.2.1 The sensitivity of the landscape receptors has been assessed as follows:

- **Mature tree specimens and tree/shrub belts** have been assessed as having a high value. Susceptibility to change would be medium as the majority of the existing trees and shrubs would be retained. The overall sensitivity of the existing mature tree specimens and tree / shrub belts is judged to be **Medium**;
- **The Jeffrey's Farm Area: Agricultural Buildings and Storage Containers** are assessed as being of low value being in a state of disrepair and detracting from the landscape setting. There would be a low susceptibility to change as some agricultural buildings would be retained to the east of the farm area leading to a **Low** sensitivity overall;
- **The Equestrian Outbuildings / Stables** are judged to be of low value. There would be a low susceptibility to change as the stables and equine fencing detract from the landscape setting and a **Low** sensitivity overall;
- **The Overhead Telephone Wires** are also assessed as being of low value as they detract from the landscape and AONB setting. The susceptibility to change is judged to be low as they would be retained and therefore sensitivity is assessed as being **Low** overall;
- **Jeffrey's Farm House**: is judged to be of medium value as the isolated dwelling makes some contribution to landscape character. Susceptibility to change is judged to be medium due to the dense boundary vegetation which surrounds the garden area - leading to a **Medium** sensitivity overall;
- **The Horsted Keynes – Urban Edge** is assessed as being of medium value. The susceptibility to change is judged to be medium as the proposed access road would run off Sugar Lane - sensitivity is assessed as being **Medium**;
- **Highways: Sugar Lane and Keysford Lane** are judged as being of medium value. The proposed access road would be located off Sugar Lane and therefore susceptibility to change is judged to be medium. The resulting sensitivity would also be **Medium**;
- **Proposed Development Site: Landscape character** - value has been assessed as being medium. Susceptibility to change is judged to be High as the character of the two fields and farm area would permanently change with the type of development proposed. The development site landscape character is judged to have a **High** sensitivity overall.

Magnitude of Change: Construction Phase

7.2.2 During the construction phase of the proposed development scheme, there would be short term effects in relation to the demolition of agricultural buildings, general ground works and construction of the access road, community building and residential units.

- Magnitude of Change: Completion of the Proposed Development Scheme***
- 7.2.3 Following completion of the proposed scheme, effects would be permanent and related to the perceptibility of the proposed access road, community building and residential units.
- Assessment of Landscape Effects***
- 7.2.4 The proposed scheme would require the removal of several agricultural buildings to the west of the Jeffrey's Farm area as well as storage containers and self-seeded trees. There would be limited removal of dense shrub areas to facilitate the construction of the residential dwellings and access road.
- Mature tree specimens and tree/shrub belts***
- 7.2.5 The magnitude of change in relation to existing mature tree specimens and tree / shrub belts is assessed as being **Minor** as the removal of existing vegetation would be limited to self-seeded trees within the farm area and localised areas of dense shrubs / small trees. There would be a **Low / Slight Adverse** overall degree of landscape effect in relation to the mature tree specimens and tree / shrub belts as a result of the proposed development scheme.
- Jeffrey's Farm Area - Agricultural Buildings and Storage Containers***
- 7.2.6 Several agricultural buildings and shipping containers are proposed to be removed to facilitate the proposed development. A number of the buildings are derelict and the farm area is slightly chaotic in appearance. There would be a **Moderate** magnitude of change in relation to the proposed removal of the agricultural buildings and a permanent **Low / Slight Beneficial** overall degree of landscape effect as the buildings and storage containers detract from the landscape and AONB setting.
- Equestrian Outbuildings / Stables***
- 7.2.7 There would be a **Minor** magnitude of change in relation to the proposed removal of the equestrian electric fencing and two stables. The outbuildings and fencing detract from the landscape and AONB setting and therefore, there would be a permanent **Low / Slight Beneficial** overall degree of landscape effect as a result of their removal.
- Overhead Telephone Wires***
- 7.2.8 The overhead telephone wires are a man-made component which detracts from the landscape setting. As they are proposed to be retained the magnitude of effect would be **None** and there would be **No Change** in the overall degree of landscape effect.
- Jeffrey's Farm House***
- 7.2.9 The setting of Jeffrey's Farm House would experience a short term **Moderate** magnitude of change in relation to demolition and construction activities however this would be set against the close proximity of everyday farming activities. There would be a short term **Moderate Adverse** overall degree of landscape effect as a

result of the proposed scheme and resulting impacts on tranquillity as well as the removal of some shrub/small tree planting to the north-west of the garden area.

Horsted Keynes – Urban Edge

- 7.2.10 The setting of the residential dwellings which form the western, urban edge of Horsted Keynes would experience a short term **Moderate** magnitude of change due to the close proximity of the proposed development site area to the west of Sugar Lane. There would be a short term **Moderate Adverse** overall degree of landscape effect during the construction phase of the proposed scheme due to construction deliveries to Sugar Lane and general development site activities.

Sugar Lane and Keysford Lane

- 7.2.11 There would be a short term, **Minor** magnitude of change in relation to the setting of Sugar Lane and the construction of the entrance to the proposed access road and a short term **Low / Slight Adverse** overall degree of landscape effect.

Proposed Development Site - Landscape Character (Construction Phase)

- 7.2.12 The magnitude of change in relation to landscape effects arising from the proposed development scheme during the construction phase would be short term and **Major** and limited to the immediate development site context. The overall degree of landscape effect would be a short term **Substantial Adverse** as localised demolition operations and general construction site activities would negatively impact on the development site landscape character.

Proposed Development Site - Landscape Character (Post Construction)

- 7.2.13 Following completion of the proposed residential scheme the magnitude of change is anticipated to be **Major** but would be limited to the immediate development site context. The proposed development scheme would introduce a new access road off Sugar Lane, a community building and residential units to the west and north of the Jeffrey's Farm area. Therefore, the overall degree of landscape effect following completion of the scheme would be a permanent **Substantial Adverse**.

Conclusion

- 7.2.14 The proposed scheme would comprise 42 no. mixed residential units which would be partly located to a green-field site to the north of Jeffrey's Farm and to an area west of the main farm area. A new access road would be constructed off Sugar Lane from a location opposite and slightly north of Jefferies and a community building is proposed to the north east of the farm – also to a grassland field. All the mature trees which lie to the field edges are proposed to be retained with only self-seeded trees which are in close proximity to agricultural buildings proposed to be demolished to be removed. Limited areas of shrubs / small trees would also be removed to facilitate the proposed development however an extensive soft landscape scheme would incorporate native tree planting throughout the site as well as hedgerows, understorey shrub planting areas and a native grassland and wildflower meadow area.

- 7.2.15 There would be short term and permanent adverse landscape effects as a result of the proposed development scheme however the site is bordered to the east and north with highways and adjacent to the western urban edge of Horsted Keynes. Jeffrey's Farm lies to the south and there are residential dwellings to the south of the existing farm access track meaning there is an existing urban element to the proposed site area character. The retained dense vegetation to the site boundaries would mean adverse landscape character impacts would be limited to the immediate development site area.

7.3 Statutory Landscape Designations

High Weald - Area of Outstanding Natural Beauty

- 7.3.1 Jeffrey's Farm and the proposed development site area lies within the High Weald AONB and within the High Weald AONB Management Plan it states that looking forward to 2024, the AONB should retain: *its remarkable character and scenic beauty*. The farm area with its slightly dilapidated and chaotic appearance, the overhead telephone lines and equestrian stables all detract from the setting of the High Weald AONB.
- 7.3.2 The plan goes on to mention: *In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, other rural industries and of the economic and social needs of local communities*. Within the: *Role of the AONB vision* section of the plan, it mentions the need to take a: *realistic and practical view that faces up to the likely demographic changes that increase demand for housing, lifestyle and technological changes, increase in traffic, climate change, and the decline of traditional farm businesses as well as: protecting biodiversity and improving the quality of the natural and historic environment*.
- 7.3.3 The management plan identifies a number of objectives which have relevance to the proposed scheme including:
- ***S2 Objective: To protect the historic pattern of settlement.*** Rationale: *To protect the distinctive character of towns, villages, hamlets and farmsteads and to maintain the hinterlands and other relationships (including separation) between such settlements that contribute to local identity;.*
 - ***W1 Objective: To maintain existing extent of woodland and particularly ancient woodland.*** Rationale: *To maintain irreplaceable habitats for biodiversity, to maintain a key component of the cultural landscape, and to maintain contribution to carbon storage;*
 - ***FH2 Objective: To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.*** Rationale: *To maintain fields and field boundaries that form a part of the habitat mosaic of the High Weald; and to maintain this key component of what is a rare UK survival of an essentially medieval landscape;*
 - ***FH3 Objective: To enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.*** Rationale: *To*

improve the condition, landscape permeability and connectivity of fields and heaths and their associated and interrelated habitats (such as hedges, woodlands, ditches, ponds and water systems) for wildlife.

- 7.3.4 Whilst the proposed scheme lies partly to a green field site it is also adjacent to the western edge of Horsted Keynes and is edged by Keysford Lane to the north and Sugar Lane to the east. The Jeffrey's Farm area and several residential dwellings are located to the southern edge. Therefore, the proposed development site has a existing urban element to its character.
- 7.3.5 The retained boundary vegetation would be enhanced with additional native shrub planting areas and trees which would reinforce the existing vegetation as well as providing succession tree specimens. The existing field patterns would be largely maintained with retained trees and shrub belts. The proposed residential development would incorporate native species hedgerows, tree specimens and a grassland and wildflower meadow area which would enhance the proposed development site biodiversity and create a new habitat area.
- 7.3.6 Whilst the proposed scheme would result in the loss of some limited shrub planting areas and part of a grassland field, it would provide a mix of much needed housing as well as allowing farming activity to continue – albeit on a reduced scale.

Ancient Woodland

- 7.3.7 *Parson's Wood* to the north west of the proposed development site area is designated as Ancient Replanted Woodland and *Coneyborough Wood* to the south is designated as Ancient Woodland. The distance between the designated areas and the proposed development site as well as intervening landscape features (Keysford Lane to the north and residential dwellings to the southern edge of the Jeffrey's Farm access track) mean the setting of the designated woodland would be unaffected by the proposed residential scheme.

7.4 Visual Effects: Extent of Visibility - Zone of Theoretical Visibility (ZTV)

- 7.4.1 The Zone of Theoretical Visibility (ZTV) illustrating the anticipated perceptibility of the proposed development scheme has been assessed by means of a desktop survey which was then refined with a site visit. The ZTV is illustrated on: *RCo180 / Figure 01 / Viewpoint Locations and ZTV*.
- 7.4.2 The existing field edge vegetation constrains views of the proposed development site area from locations to the surrounding urban and semi-rural landscape. To the northern boundary, a belt of coniferous and deciduous trees as well as dense shrubs to the southern edge of Keysford Lane limit views from locations to the highway and open fields further north. There are some, very long distance views from elevated locations to the north of the proposed development site area over the top of the boundary trees.

- 7.4.3 To the north-east, the tree and shrub belt to the western edge of Sugar Lane, limits and constrains views from locations to Sugar Lane and the residential properties to the eastern edge of the highway. There are partial views from locations to the southern end of Sugar Lane to the field which is proposed to be given over as a community space – however mature trees and shrubs to the western edge of the highway limit views west. Residential dwellings constrain views further east of Sugar Lane from locations within the urban environment of Horsted Keynes.
- 7.4.4 To the south, mature trees and dense shrubs to the southern edge of the Jeffrey's Farm access track constrain the Zone of Theoretical visibility. To the south west, a gap in the boundary vegetation allows views from locations to part of an open agricultural field. To the west and north-west, views from Keysford Lane and locations to the north of the highway would be limited by intervening vegetation to the highway edge and development site boundaries.
- 7.4.5 The undulating nature of the landscape to the north, west and south of Jeffrey's Farm as well as the wooded character means views are generally constrained however, there are occasional long distance views from elevated and isolated locations to the north and south west.

7.5 Visual Effects: Viewpoints and Visual Receptors

- 7.5.1 The viewpoint photographs are shown in *Appendix B: Viewpoint Photographs*.

Viewpoint 01 - PROW: Footpath South of Bennetts Looking North

- 7.5.2 This viewpoint is located to the west of Treemans Road and south of Jeffrey's Farm. The view looks north and to the right of the image is a clear view of Bennetts – one of several, detached residential dwellings which lie to the east and west of Treemans Road south of Horsted Keynes. This view is representative of recreational walkers who would be anticipated as having a high susceptibility to change - value is assessed as being high as the location is within the AONB and there are partial, long distance views of elevated locations to the north - the resulting sensitivity is judged to be **High**. Intervening vegetation constrains the visibility of the proposed development site area and therefore the magnitude of effect is assessed as being **Minor**.

- 7.5.3 There would be a **Negligible Neutral** overall degree of visual effect as a result of the proposed development scheme. Any views of residential dwellings would be limited by intervening vegetation which would be enhanced with additional tree specimens to the southern edge of the proposed development site area.

Viewpoint 02 - PROW: Footpath Looking North

- 7.5.4 Viewpoint 02 looks north from a location to a PROW: Footpath to the north-west of *Old Keysford Hall*. The viewpoint lies to an unmade farm track and the near proximity of mature trees and dense shrubs mean views north are limited although residential dwellings which lie to the west of Treemans Road are visible to the edge

of a grassland field. Value is assessed as being medium as although the viewpoint is located within the AONB, views are limited and modern residential dwellings are visible in mid-distance views. The viewpoint would be representative of recreational walkers and therefore susceptibility to change is high with the resulting sensitivity judged also to be **High**. The magnitude of effect would be **None** as the Jeffrey's Farm area and proposed development site are not perceptible in views from this location.

- 7.5.5 There would be **No Change** in the overall degree of visual effect as a result of the proposed development scheme as dense, intervening vegetation constrains the visibility of the proposed site in views from this location.

Viewpoint 03 - Keysford Lane Looking North-East

- 7.5.6 This viewpoint is located to Keysford Lane adjacent to a residential dwelling: *High Beeches* and is included as an example of the long distance views which are available to the south-west of Horsted Keynes. The elevated location allows for panoramic views across the landscape and would be representative of road users and residents of High Beeches - residents would be anticipated as having a high susceptibility to change. Value is also assessed as high due to the scenic quality and AONB designation - the resulting sensitivity is judged to be **High**. The magnitude of effect would be **Minor** due to the nature of the long distance views and intervening vegetation which limits the visibility of the proposed development site area.

- 7.5.7 The perceptibility of the proposed development site area is constrained by a combination of long distance and intervening trees and shrubs, therefore the anticipated overall visual effect would be **Negligible Neutral**.

Viewpoint 04 – PROW: Footpath off Keysford Lane Looking East

- 7.5.8 Viewpoint 04 is located to a PROW: Footpath which runs north off Keysford Lane to the west of the Bluebell Railway line. The combination of the rising topography and trees to the southern edge of Keysford Lane mean views east are very constrained. The value of this view is judged to be medium as although the viewpoint lies within the High Weald AONB it is not particularly representative of the designation with limited scenic quality. This viewpoint would be representative of recreational walkers who would be anticipated to have a high susceptibility to change - the resulting sensitivity is judged to be **High**. The magnitude of effect would be **None** as there are no views of the proposed development site area from this location.

- 7.5.9 There would be **No Change** in the overall degree of visual effect as views of Jeffrey's Farm and the proposed development site area are constrained and limited by intervening vegetation and topography.

Viewpoint 05 – Private Farmland off Keysford Lane Looking East

- 7.5.10 Viewpoint 05 is located to private farmland adjacent to Keysford Lane and looks east towards the north-western boundary of the proposed development site area. This view would be representative of agricultural workers who would be anticipated as having a low-medium susceptibility to change. Value is judged to be medium as although the location is within the High Weald AONB, the close proximity of Keysford Lane and overhead power lines means the view is not particularly representative of the designation. The resulting sensitivity is assessed as being **Medium**. The magnitude of effect would be **None** as the proposed development site is not perceptible in views from this location.

- 7.5.11 There would be **No Change** in the overall degree of visual effect as the proposed development site and Jeffrey's Farm area are not visible in views from this location due to intervening vegetation to the edge of Keysford Lane.

Viewpoint 06 – Junction of Sugar Lane and Keysford Lane Looking South

- 7.5.12 This viewpoint is located to the junction of Sugar Lane and Keysford Lane to the north-east of the proposed development site area. The highways and residential dwellings mean there is a distinct urban character to this location to the north-west of Horsted Keynes. The view would be representative of road users and residents to nearby properties – residents would be anticipated to have a high susceptibility to change. The view south is constrained by mature trees and there are a number of man-made components including telegraph poles and signage - although Horsted Keynes is located within the High Weald AONB value is considered to be medium with the resulting sensitivity judged to be **High** overall. The magnitude of effect is anticipated to be **Minor** as views of the proposed development site area would be limited by the mature trees to the southern edge of the junction.

- 7.5.13 There would be a **Negligible Neutral** overall degree of visual effect as mature trees to the north-east of the proposed development site area (which are proposed to be retained and enhanced with additional tree specimens) would limit the perceptibility of the proposed residential scheme.

Viewpoint 07 – Boxes Lane Looking West

- 7.5.14 Viewpoint 07 lies to the east of the proposed development site area to Boxes Lane which runs off Sugar Lane. The view shows the existing mature trees and dense shrub planting to the western edge of Sugar Lane which limits the visibility of the proposed development site. This view would be representative of road users and residents to nearby properties to the north and south of this location – residents are likely to have a high susceptibility to change. The constrained nature of this view means despite its location within the High Weald AONB value is assessed as being medium - sensitivity is judged to be **High**. The magnitude of effect is anticipated to be **Minor** as the dense tree and shrub belt to the eastern boundary of the proposed development site would limit views of the proposed residential scheme.

- 7.5.15 The proposed development would result in a **Negligible Neutral** overall degree of visual effect as the tree and shrub belt to the western edge of Sugar Lane is proposed to be retained and enhanced with additional tree planting to the east of the proposed development site area. This would constrain views of the proposed development from this location and Sugar Lane.

Viewpoint 08 – Jefferies Looking West

- 7.5.16 This viewpoint lies to Jefferies and looks west over Sugar Lane towards the eastern edge of the field which is proposed to be used as a community open space. The view shows the mature trees and dense shrubs which lie adjacent to Sugar Lane which limit views west. This view would be representative of road users (Sugar Lane and Jefferies) and residents to the properties which lie to the western end of Jefferies – residents would be anticipated to have a high susceptibility to change. Despite the location being within the High Weald AONB, the highways and residential dwelling means value is assessed as being medium - sensitivity is judged to be **High**. The magnitude of effect is anticipated to be **Moderate** as the proposed access road and community building would be perceptible in views from this location.
- 7.5.17 A limited section of shrub planting to the edge of Sugar Lane would be removed to facilitate the construction of the proposed entrance of the new access road. The retained trees and proposed tree and hedgerow planting would filter views of the access road and community building however they would still be new components within this view and therefore, there would be a **Moderate Adverse** overall degree of visual effect.

Viewpoint 09 – Treemans Road Looking North

- 7.5.18 Viewpoint 09 looks north up Sugar Lane and is located to Treemans Road which lies to the south of Sugar Lane. The existing trees to the edges of Sugar Lane and the Jeffrey's Farm access track mean views to the proposed development site area are limited. This view would be representative of road users who would be anticipated as having a low susceptibility to change, value is judged to be medium as AONB status notwithstanding the view is urban in character with modern dwellings and Sugar Lane prominent. The resulting sensitivity is assessed to be **Medium** overall. The magnitude of effect is anticipated to be **Minor** as the existing trees and shrubs limit views of the proposed development site area.
- 7.5.19 Any partial views of the community building proposed to the eastern edge of the proposed development site area and access road would be viewed within the context of the existing residential dwellings and Sugar Lane. The existing trees to the edge of Sugar Lane and to the Jeffrey's Farm access road would be retained and additional tree and hedgerow planting is proposed to the edges of the new access road. Therefore, there would be a **Low / Slight Adverse** overall degree of visual effect as a result of the proposed development scheme.

8.0 SUMMARY AND CONCLUSIONS

8.1 Zone of Theoretical Visibility (ZTV)

- 8.1.1 The proposed development site is located to the western edge of Horsted Keynes and benefits from mature tree and dense shrub planting to the boundaries. All the existing boundary vegetation, with the exception of limited areas of shrubs and self-seeded trees (within the existing farmyard area) are proposed to be retained. A comprehensive soft landscape scheme would seek to reinforce the existing boundary planting with native shrub, hedgerow and tree planting.
- 8.1.2 To the north, the ZTV boundary is constrained by the dense coniferous and deciduous tree belt which lies to the southern edge of Keysford Lane which limits views south from Keysford Lane and fields further north. There are some very long distance views of a limited area of the proposed development site from elevated locations to the north of Horsted Keynes. To the east, the ZTV is defined by the mature trees and shrubs which lie to the western edge of Sugar Lane as well as the urban, western edge of Horsted Keynes.
- 8.1.3 To the south the ZTV is constrained by the mature trees which lie to the edges of the existing Jeffrey's Farm access track. Further west to the southern edge, mature trees and shrubs would be reinforced with additional tree specimens which would limit the perceptibility of the proposed residential scheme in views from locations to an agricultural field to the south.
- 8.1.4 To the south-west and west, the existing boundary planting is proposed to be reinforced with a 5.0m wide buffer of native trees and shrubs which would enhance the existing vegetation and limit views from agricultural fields to the west.

8.2 Mitigation

- 8.2.1 The proposed development site benefits from mature tree and shrub planting to the boundaries and with the exception of limited areas of boundary shrub planting and self-seeded tree specimens to the west of the Jeffrey's Farm area, the boundary vegetation would be retained and protected. To the north, the existing tree and shrub belt would be reinforced with additional, native tree planting to the edge of a pedestrian path. To the east, the existing mature trees and shrubs to the edge of Sugar Lane would be reinforced with tree specimens to the edge of the residential garden areas.
- 8.2.2 To the west, the existing shrub/small tree planting to the boundary would be enhanced with a 5.0m wide 'green' buffer of native trees and shrubs. The south western boundary would also benefit from tree planting which would reinforce the existing retained, vegetation.

- 8.2.3 Within the proposed development site area, the garden boundaries would be enhanced with native hedgerows and hedgerow trees. The main access road and pedestrian paths would also be edged with native hedgerow and tree planting. A native wildflower and grassland meadow area is proposed to the north of the proposed residential development which would enhance the existing biodiversity - attracting invertebrates such as bees and butterflies.

8.3 Landscape Effects

- 8.3.1 The overall degree of landscape effects with regard to the proposed development are summarised below in Table 06.

Table 06 Anticipated Overall Degree of Landscape Effects (Landscape Character / Landscape Components)			
<i>Landscape Receptors</i>	<i>Sensitivity</i>	<i>Magnitude of Effect</i>	<i>Overall Degree of Landscape Effect</i>
Mature tree specimens and tree/shrub belts	Medium	Minor	Low / Slight Adverse
The Jeffrey's Farm Area: Agricultural Buildings and Storage Containers	Low	Moderate	Low / Slight Beneficial
Equestrian Outbuildings / Stables	Low	Minor	Low / Slight Beneficial
Overhead Telephone Wires	Low	None	No Change
Jeffrey's Farm House	Medium	Short term Moderate	Short Term Moderate Adverse
Horsted Keynes – Urban Edge	Medium	Short term Moderate	Short Term Moderate Adverse
Highways: Sugar Lane and Keysford Lane	Medium	Short Term Minor	Short Term Low/Slight Adverse
Proposed Development Site: Landscape character (Construction Phase)	High	Major	Short term Substantial Adverse
Proposed Development Site: Landscape character (Post Construction)	High	Major	Permanent Substantial Adverse

- 8.3.2 The proposed scheme would seek to construct 42 housing units of varying types to the west of the Jeffrey's Farm area and to a pasture field to the south of Keysford Lane, Horsted Keynes. An access road and community building is proposed to a field to the north east of the farm area (to the west of Sugar Lane). The existing vegetation would be retained with the exception of several self-seeded trees to the farm area and limited areas of dense shrub planting. A comprehensive soft landscape scheme would enhance and reinforce the existing boundary vegetation with native hedgerow, understory shrub planting areas and tree specimens. A

- native wildflower and grassland meadow is proposed to the open area to the north of the residential dwellings.
- 8.3.3 The existing mature tree specimens and tree/shrub belts are proposed to be largely retained and protected with only limited shrub planting areas and trees which are in close proximity to existing farm buildings proposed to be removed. Therefore, there would be a **Low / Slight Adverse** overall degree of landscape effect in relation to the existing mature tree specimens and tree/shrub belts as a result of the proposed residential scheme.
- 8.3.4 The removal of several agricultural buildings (some of which are derelict) and storage containers would mean there would be a **Low / Slight Beneficial** overall degree of landscape effect as they detract from the landscape setting and AONB designation.
- 8.3.5 The equestrian fencing and stables / outbuildings detract from the landscape setting and therefore their removal would result in a **Low / Slight Beneficial** overall degree of landscape effect.
- 8.3.6 The overhead telephone wires are a visible, man-made component which detracts from landscape character however there would be **No Change** in the overall degree of landscape effect as the overhead wires are to be retained.
- 8.3.7 There would be a short term **Moderate Adverse** overall degree of landscape effect on the setting of Jeffrey's Farm House as a result of construction site activities and deliveries.
- 8.3.8 Sugar Lane forms the western edge of Horsted Keynes with a number of residential properties to the eastern edge of the highway. There would be a short term **Moderate Adverse** overall degree of landscape effect on the setting of the Horsted Keynes urban edge as a result of deliveries and general construction site operations.
- 8.3.9 Keysford Lane and Sugar Lane lie to the northern and eastern boundaries of the proposed development site area respectively. There would be a short term **Low / Slight Adverse** overall degree of landscape effect as a result of construction site deliveries and the construction of the entrance to the new access road.
- 8.3.10 The proposed residential scheme is anticipated to have a short term **Substantial Adverse** overall degree of landscape effect on the proposed development site landscape character as a result of demolition activities, ground work operations and general construction site activities. Following completion of the scheme, the overall degree of landscape effect would be permanent and **Substantial Adverse** as the bulk of the residential dwellings, the community building and associated access road would be new, man-made components within two agricultural fields to the west of Horsted Keynes.

- 8.3.11 Whilst short and long-term adverse development site landscape character impacts are anticipated, they would be limited to the immediate development site context due to the enclosed character of the site. The retained development site boundary planting would be reinforced with native trees, hedgerows and shrubs - enhancing the development site ecology and biodiversity.

8.4 Visual Effects

- 8.4.1 The overall degree of visual effect in relation to the proposed development and the selected representational viewpoints is summarised below in Table 07.

Table 07 Anticipated Overall Degree of Visual Effect			
Viewpoint	Sensitivity	Magnitude Of Effect	Overall Degree of Visual Effect
Viewpoint 01 - PROW: Footpath South of Bennetts Looking North	High	Minor	Negligible Neutral
Viewpoint 02 - PROW: Footpath Looking North	High	None	No Change
Viewpoint 03 - Keysford Lane Looking North-East	High	Minor	Negligible Neutral
Viewpoint 04 – PROW: Footpath off Keysford Lane Looking East	High	None	No Change
Viewpoint 05 – Private Farmland off Keysford Lane Looking East	Medium	None	No Change
Viewpoint 06 – Junction of Sugar Lane and Keysford Lane Looking South	High	Minor	Negligible Neutral
Viewpoint 07 – Boxes Lane Looking West	High	Minor	Negligible Neutral
Viewpoint 08 – Jefferies Looking West	High	Moderate	Moderate Adverse
Viewpoint 09 – Treemans Road Looking North	Medium	Minor	Low / Slight Adverse

8.5 Visual Receptors

Residential

- 8.5.1 The nearest residential dwelling to the proposed development site area is Jeffrey's Farmhouse which lies to the north and east of the farm area within a moderately sized garden. It is likely the existing farm buildings would be visible in views from the dwelling and garden area and the proposed development scheme would seek to retain as much of the boundary trees and shrubs as possible which would be

enhanced with additional tree specimens to the boundaries. There would be partial views of some proposed residential dwellings to the west and north-west, therefore it is anticipated there would be a **Moderate Adverse** overall degree of visual effect in views from Jeffrey's Farm House and garden area. The visibility of proposed new buildings would be viewed within the context of existing farm buildings and the perceptibility of residential buildings would be expected to decrease as the planting to the boundaries matured.

- 8.5.2 There would be partial views from residential properties to the western end of Jefferies (*Viewpoint 08*) of the access road entrance and community building however existing, retained tree specimens and proposed hedgerow and tree planting would filter and soften views west and north-west. There would be a **Moderate Adverse** overall degree of visual effect as a result of the proposed scheme in views from the properties to the west of Jefferies.
- 8.5.3 A long distance view from a location close to a property to the southwest of the proposed development site area (*High Beeches*) off Keysford Lane (*Viewpoint 03*) has been assessed as having a **Negligible Neutral** overall degree of visual effect. A view from Boxes Lane to the east of the proposed development site area (*Viewpoint 07*) has also been assessed as having a **Negligible Neutral** overall degree of visual effect.

Recreational Users

- 8.5.4 Whilst there are no Public Rights of Way either within or adjacent to the proposed development site area, there are designated bridleways and footpaths to the surrounding area. To the south of the proposed development site area, a PROW: Footpath runs off Treemans Road immediately south of a row of residential dwellings however intervening vegetation limits views to Jeffrey's Farm and the proposed development site area. *Viewpoint 01* to the south of Bennetts has been assessed as having a **Negligible Neutral** overall degree of visual effect. There would be **No Change** in the overall degree of visual effect in views from *Viewpoint 02* (to the north-west of Old Keysford Hall).
- 8.5.5 To the west of the proposed development site, a PROW: Footpath runs north off Keysford Lane adjacent to the Bluebell Railway line. *Viewpoint 04* would have **No Change** in the overall degree of visual effect due to the rising topography and intervening mature vegetation.

Road Users

- 8.5.6 Views south to the development site area from a location to the junction of Keysford Lane and Sugar Lane (*Viewpoint 06*) are limited by mature trees and shrubs - therefore, the overall degree of visual effect is anticipated to be **Negligible Neutral**.
- 8.5.7 To the south of the Jeffrey's Farm access road, a location to the northern end of Treemans Road (*Viewpoint 09*) is assessed as having a **Low / Slight Adverse** overall

degree of visual effect as existing and proposed vegetation would soften and filter views north-west to the proposed development site area.

Agricultural Workers

- 8.5.8 The existing vegetation and proposed reinforcing boundary planting would limit and constrain views from agricultural fields to the north, north-west and south of the proposed development site area. The proposed development would be partially visible from locations to an open agricultural field to the west of Jeffrey's Farm. A proposed 5.0m wide buffer of tree and shrub planting would soften and filter any views of the proposed dwellings which would be within the context of the existing farm buildings.
- 8.5.9 To the north of the proposed development site area, a location to the north of Keysford Lane (*Viewpoint 05*) to the edge of an agricultural field has been assessed as having **No Change** in the overall degree of Visual effect as intervening trees limit views of the proposed development site area.

8.6 Conclusions

- 8.6.1 Jeffrey's Farm is a small, commercial egg producing business which lies to the west of Horsted Keynes. The proposed development scheme would seek to construct a total of 42 no. mixed, housing units to a field which lies to the south of Keysford Lane and west of Sugar Lane. In addition, several dwellings would be located to the west of the Jeffrey's Farm area resulting in the removal of a number of agricultural buildings and storage containers. A community building and access road are proposed to a field to the north-east of the farm area and pedestrian paths would provide links from the proposed development to Sugar Lane and the village beyond.
- 8.6.2 The proposed development site benefits from dense shrub and ruderal planting to the boundaries as well as numerous trees – some of which are large and mature specimens. The proposed scheme would seek to retain the existing boundary planting wherever possible – maintaining the existing field patterns. A comprehensive soft landscape scheme would reinforce the existing boundary planting with native understorey shrub planting areas and tree specimens. The residential garden areas, access road and pedestrian paths would be enhanced with native hedgerows and tree specimens – a native wildflower and grassland meadow area is proposed to the north of the proposed development.
- 8.6.3 As the proposed residential scheme would introduce residential dwellings, a community building and access road to two agricultural fields, it is inevitable there would be adverse landscape character effects. However, negative impacts would be limited to the immediate context of the proposed development site due to the retained field edge vegetation which is proposed to be enhanced with additional planting.

- 8.6.4 There is also an existing urban element to the landscape character with residential properties to the south and east as well as Sugar Lane and Keysford Lane to the eastern and northern boundaries respectively – overhead telephone wires running across the proposed development site area are also prominent in views. A number of visually intrusive elements including dilapidated farm buildings, chicken wire fences, steel storage containers and equestrian out-buildings would be removed as part of the proposed scheme.
- 8.6.5 Adverse visual effects as a result of the proposed residential scheme from locations to the surrounding landscape would be limited by the existing, mature planting to the boundaries which is proposed to be enhanced. Near distance views from the northern section of Sugar Lane and the residential dwellings to the western edge of Horsted Keynes would be constrained by the dense tree and shrub belt to the north-eastern edge of the proposed development site. Views from the southern end of Sugar Lane and Jefferies would be filtered and softened by existing mature trees. The entrance to the access road would form a new component in near distance views but would be within the context of Sugar Lane and Treemans Road. Views from locations to the south, west and north of the proposed development site would be constrained by the existing and proposed boundary vegetation.
- 8.6.6 It is therefore envisaged the proposed residential scheme could be accommodated within the development site area without undue harm to the existing landscape character, visual amenity or the setting of the High Weald Area of Outstanding Natural Beauty.

9.0 REFERENCES

9.1.1 This assessment has been prepared with in accordance with the following guidance:

- *Guidelines for Landscape and Visual Impact Assessment (Third Edition)* published by the Landscape Institute and Institute of Environmental Management and Assessment in 2013;
- *An Approach to Landscape Character Assessment* published by Natural England 2014;
- *Photography and Photomontage in landscape and visual impact assessment*; Advice Note 01/11, Published by the Landscape Institute.

9.1.2 The following Landscape Character Assessments and digital resources were used:

- *Natural England - National Character Areas Profile: 122 - High Weald (2013)*;
- *The High Weald Area of Outstanding Natural Beauty Management Plan (2014-2019)*;
- *Regional Landscape Character - Landscape Character Assessment of West Sussex (2003): HW1 - High Weald*;
- *District Landscape Character - A Landscape Character Assessment For Mid Sussex (2005): High Weald*;
- *MAGIC Interactive Map, Defra and Natural England.*

9.1.3 The following Planning Policy Documents were used;

- *The National Planning Policy Framework*;
- *Mid Sussex District Council: Mid Sussex Local Plan 2004*;

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Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA11

ID: 1373

Response Ref: Reg19/1373/2

Respondent: Mr J Munday

Organisation: Stop Haywards Heath Golf Course Development
Community Group

On Behalf Of:

Category: Organisation

Appear at Examination? x

[REDACTED]

From: Jamie Munday [REDACTED]
Sent: 27 September 2020 18:48
To: ldfconsultation
Subject: Regulation 19 Representation
Attachments: Policy SA11 Site Allocations DPD comments.pdf; response form - policy SA10.pdf; response form - policy SA11.pdf; response form - Sustainability Appraisal page 134-5.pdf; Sustainability Appraisal page 134-5 comments.pdf

Dear Sir / Madam

Please find attached a representation on behalf of the "Stop Haywards Heath Golf Club Community Group" in relation to the Regulation 19 consultation.

Yours faithfully

Jamie Munday

Sent from [Mail](#) for Windows 10

SITE ALLOCATIONS DPD - REGULATION 19 Consultation

Representation by: Stop Haywards Heath Golf Club Development Community Group

Policy SA11 (Additional Housing Allocations) - SUPPORT

The allocated housing sites in the Site Allocations DPD are strongly supported.

We note that following the consultation for the Site Allocations DPD Regulation 18, the Council undertook an assessment of all newly submitted housing and employment sites put forward through the consultation together with a re-assessment of all omission sites including through the Sustainability Appraisal.

This concluded as set out in the report to Full Council on 22 July 2020 that none of the sites (whether new or omission sites) were considered suitable and/or compliant with the District Plan strategy at this time for inclusion in the Site Allocations DPD.

This fair and rigorous site selection and review is to be welcomed in ensuring the process is robust.

We are aware from the representations made during the Regulation 18 Consultation that a number of objections were made to the proposed site allocations at Folders Lane, Burgess Hill. Many of these suggested that the Haywards Heath Golf Club site should be a site allocation instead. The Council has given full consideration to this site, as an omission site as set out in their committee report ¹. We welcome the confirmation by the Council that the site is not appropriate for allocation. We draw attention to our representation to the Sustainability Appraisal and some factual errors which reinforce the conclusions of the Council in relation to this site.

Please also refer to our comments on **SA10** and pages **134-135 of the Sustainability Appraisal (July 2020)**, which have been included in separate response forms.

Please also refer to the points articulated in our **Regulation 18** representation – [see Appendix 1](#).

¹ As reported to the Full Council meeting on 22 July 2020

Appendix 1 – Regulation 18 Representation

SITE ALLOCATIONS DPD REGULATION 18 AND SUSTAINABILITY APPRAISAL - MID SUSSEX DISTRICT COUNCIL

CONSULTATION RESPONSE –

NAME: Stop Haywards Heath Golf Club Development Community Group

The proposed Site Allocations DPD, preferred strategy for development and the draft allocations, is supported. Comments as follows:

1) Site Allocations DPD (September 2019)

1.1. The Development Plan process and procedures

The consultation for the Site Allocations DPD has been considered by Councillors in September 2019² as we understand there was some concern about this. It is reassuring to note from the Minutes that this item was considered at length and members were advised that the Council has retained Paul Brown QC to critically review both the preparation of the DPD including the consultation exercise at every stage which is to be welcomed thus ensuring the process is robust.

1.2. Housing Supply

We note that the District Council housing requirements figures have been recalculated to take into account completions and planning permissions since the Local Plan was adopted.

We understand that this is in line with the National Planning Policy Framework 2019 (NPPF) requirements and that the Council need to provide an Annual Position Statement³ on 1st April which explains how their five year housing land supply is calculated and evidenced. This means that your housing land supply figure can be 'fixed' for one year to avoid discussion at planning appeals about the supply position at the time of each appeal.

Clearly the process of planning permissions granted and houses built is an ongoing process. It would seem entirely logical for the Council to use their best endeavours to ensure their information on housing supply is based on the most up to date situation in line with the NPPF.

The preparation of the Statement requires the monitoring of housing supply and therefore provides the basis for the calculations of necessary allocations for the Site Allocations DPD.

Whilst this is understood it is worthy of note that a sustained supply of housing units coming forward. Whilst not a detailed analysis a brief review of residential planning permissions on the Council's website since April 2019 shows a steady and ongoing provision of deliverable sites. Of the larger sites there are:

- 460 dwellings at Burgess Hill, which is part of the strategic allocation in the adopted Local Plan for that location, was granted permission on 24th July 2019.
- The draft allocation for 130 dwellings rear of Friars Oak London Road, Hassocks has very recently been granted permission on appeal (1st November 2019) enabling this to be brought forward ahead of the Site Allocations process.

² As above

³ Mid Sussex District Council Annual Position Statement July 2019

- Planning permission has also recently been granted for 145 units at Perrymount Road in Haywards Heath. This site previously had outline planning but a full planning permission clearly shows an intent to bring this site forward and in line with NPPF policy and guidance can now be counted towards housing supply.

It is reasonable to conclude that at least 700 units are being brought forward early in the Local Plan process.

Discounting any demolitions or replacement applications, planning permissions approved through windfall applications is in the region of 90 for the six months since April. This is equivalent to the number set out as the annual allowance⁴ for the Council of 84 in their calculations for the latest housing supply figures.

National guidance advises that sites with outline permission should not normally be considered deliverable sites. As such it is reasonable to now consider those where reserved matters have been approved since April 2019 as contributing to housing supply.

- 20 dwellings at Bolney Road Anstey
- 200 dwellings at Turners Hill Road, East Grinstead
- 50 dwellings at Bolney, Haywards Heath
- 12 at Dunnings Road, East Grinstead
- 303 at Copthorne

This clearly shows an intention by the developers to bring these sites for at least 500 units forward early in the planning period and ahead of the Site Allocations adoption.

1.3. Preferred Option for site allocations

Option 2 has been selected as the Council's preferred strategy going forward and this is strongly supported. It is clear that close consideration has been given to how the Council can deliver sufficient sites in the most sustainable manner and in accordance with the housing strategy as set out in the adopted Local Plan.

The choice of Option 2 is entirely logical. It gives a generous buffer in terms of delivering above the minimum residual figure which is in line with government policy in NPPF, but ensures there is not an overprovision of sites.

The rejection of Option 3 is sensible as the allocation of the Haywards Heath Golf Course site is not needed to meet the housing supply requirements. Further, as evidenced in the Sustainability Appraisal the negative impacts on the environment are not justified.

It is understood that the developers/promoters of the Golf Course site have been in discussions with the Council officers for some time and as part of the Council's fact checking stage of the draft allocations process for all sites under consideration. It is reasonable to assume the promoters have had plenty of opportunity to put forward their case for allocation and that it has been given close scrutiny by Council officers. Indeed this is evidenced by the fact that the site was included in one of the options. Nevertheless it is not appropriate or necessary to allocate the site when there are more sustainable opportunities for housing provision.

⁴ Scrutiny Committee for Housing, Planning and Economic Growth on 11th September 2019

2) SUSTAINABILITY APPRAISAL

Attention is drawn to a number of points in relation to the suitability of the Golf Course site for development. For clarification we understand Option C in the Appraisal below equates to Option 3 in the draft Site Allocations.

In Site Selection – Reasonable Alternatives for Assessment on page 58 of the Summary of Appraisal states:

‘Haywards Heath Golf Course (associated with Option (c)) is distant from existing services and facilities’

And, when comparing the options states:

‘Option (c) however proposes significantly more development on greenfield land and is likely to have more negative impacts on biodiversity due to the presence of ancient woodland within the Golf Course site, and it’s adjacency to a Local Wildlife Site.’

The conclusion is that development on the Golf Course site would have negative environmental impacts which would not be outweighed by the benefits of additional housing over and above what is required to meet supply requirements.

3) Further consideration of the Golf Course Site, constraints to development and lack of sustainability credentials

There are a number of points to emphasise here which need to be highlighted and underline the justification for excluding the Golf Course site from any future development plans.

3.1. Community facility

Haywards Heath Golf Club is a well-established sports club (since 1922). The Golf Course, Club House and associated facilities are used on a daily basis by a wide range of people of all ages and are open to the public as well as golf club members. There are public footpaths across the site north/south and east/west linking into the woods which are popular and valued recreational routes.

The club, course and grounds are highly regarded by the local community to the extent that local residents, with the support of Lindfield Parish Councils, recently applied for and secured Asset of Community Value status for the Golf Course.

Policy DP24 of the Local Plan seeks to avoid the loss of open space, sports and recreational buildings and land. It is recognised that the policy allows for a replacement of equal or better quantity, quality and accessibility but we would question whether that is possible for a golf course. Moreover the location and setting are unique qualities which cannot be replicated. The allocation would be contrary to this policy.

3.2. Environmental Impact

3.2.1. Green Space

The site is defined as greenfield but that does not properly reflect its high environmental, visual and amenity value. This is not simply farmland. It is a particularly high quality green space in active recreational use as a golf course and as a location to enjoy the public footpaths that wind across the site. The mature trees and rural parkland setting is maintained and managed to a high standard.

3.2.2. Environmental designations

According to the Natural England Magic Maps the Ancient Woodlands of Highgrove Wood and Sugworth Wood run along the entire western and south western boundaries and extend into the site in places. As such, any development will undoubtedly have an adverse impact on the Ancient Woodland. The National Planning Policy Framework (2019) places considerable importance on the protection of ancient woodland. This states at paragraph 175(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;’

An example of ‘exceptional reasons’ is given as infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid Bills), where the public benefit would clearly outweigh the loss or deterioration of habitat. Housing development would not fall into this category particularly when there are clearly more suitable sustainable sites available.

Further environmental designations which may place constraints on development are the proximity of High Weald Area of Outstanding Natural Beauty to the north and the fact that the site is within a SSSI Impact Zone.

Given the golf course is a large natural green space with numerous trees, including and adjacent to Ancient Woodlands, it is reasonable to assume that the site has valuable wildlife habitats which would be lost.

Policy DP37 of the Local Plan resists the loss of development which would lead to the damage or loss of trees, woodland or hedgerows and highlights the importance of protection of ancient woodland.

In light of the above and in particular the ancient woodland designations, the Council is entirely correct in placing considerable weight on the environmental credentials of the site and in concluding that sites with fewer constraints are available.

3.3. Lack of accessibility to facilities and services

Accessibility by modes other than the car is a fundamental aspect of a sustainable site. We have reviewed the information in the SHLAA and the Sustainability Appraisal and are concerned that the information is incorrect resulting in the site being considered more accessible than it actually is. As local residents who use these services and facilities on a daily basis we would like to respectfully make some corrections in relation to the distances we need to travel.

Attention is drawn to the Council’s SHLAA Strategic Site Selection Paper 2017 for the Golf Course Site (SHLAA ref: 503) which highlights the remoteness from the key services and facilities. An extract is given below which sets out the Council’s overview of accessibility of the site. The figures in this are incorrect

Accessibility	Education	15-20 Minute Walk	Despite its yield, the site proponents have suggested that new education facilities may be provided on site. An existing primary school is within a 15-20 minute walk.
	Health Facilities	>20 Minute Walk	New health facilities are not proposed on site. Existing facilities are greater than a 20 minute walk away.
	Town/Village Centre	15-20 Minute Walk	This site is an approximate 15-20 minute walk from Haywards Heath town centre where a range of shopping/leisure facilities exist.
	Public Transport	Poor	The majority of the site is greater than a 20 minute walk from Haywards Heath train station. Bus provision for this site is currently poor. However, bus provision could be improved in the town to serve the site.
	Road Congestion	Minor - Improve	This site would require improvements to access. It is remote from public transport and services so is likely to be reliant on private car usage

More concerning is the information given on page 130 of the Sustainability Appraisal for the Golf Course Site. The information on walk distances is simply wrong. This means the site is much less sustainable than stated here. It also conflicts with the information provided for the SHLAA referred to above.

Site Options: Haywards Heath				
Settlement Category: 1 Residual Need: 115				
Reasonable Alternatives for Assessment				
A: MSDC Car Park, north of Oaklands Road. SHELAA#618. Units: 8. B: Rogers Farm, Fox Hill, Haywards Heath. SHELAA#783. Units: 25. C: Haywards Heath Golf Course, High Beech Lane, Haywards Heath. SHELAA#503. Units: 630.				
Objective	A - Oaklands	B - Rogers Farm	C - HH Golf Course	Assessment
1 - Housing	+	+	++	All site options have demonstrated their deliverability; options (a) and (b) make a contribution to the residual housing need, while (c) makes a significant contribution to the need.
2 - Health	++	0	++	Site options (a) and (c) are located a 10-15 minute walk from the nearest GP surgery, while option (b) is a 15-20 minute walk.
3 - Education	+	-	++	Site option (c) is located less than a 10 minute walk from the nearest primary school, option (a) is a 10-15 minute walk, while option (b) is more than a 20 minute walk.
4 - Retail	++	+	++	Site options (a) and (c) is located less than a 10 minute walk from the nearest convenience store, while option (b) is a 10-15 minute walk.
5 - Communities	+	+	+	All site options would encourage the growth of communities.
6 - Flood Risk	0	0	0	None of the site options have areas at risk from flooding, or have suffered from flooding in the past.
7 - Land Use	-	-	-	Site option (a) and (b) are on green field land, and are relatively small sites. Option (c) is also on green field land, but is relatively large.
8 - Biodiversity	0	0	-	Site options (a) and (b) have no biodiversity constraints in terms of Ancient Woodland, SSSI and LNRs. Site option (c) has some areas of ancient woodland on the site, and is adjacent to Wickham Wood, Local Wildlife Site, with some overlaps of boundaries in the South West corner.
9 - Countryside	0	-	-	All site options are outside of the High Weald AONB. Site option (a) is an area of high landscape capacity, option (c) is in an area of medium capacity, while option (b) is in an area of low/medium capacity.
10 - Historic	0	-	0	Site option (a) and (c) have no constraints in terms of listed buildings and conservation areas. Site option (b) is constrained in terms of impact upon a listed building; it would have a less than substantial harm (medium) on Cleavewater (Grade II listed) and The Old Cottage (Grade II listed).
11 - Transport	?	?	?	None of the site options on their own are likely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.
12 - Energy/Waste	?	?	?	All site options are going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. All options should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	?	All site options are going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. All options should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	+	++	All site options perform positively against this objective. Site option (b) is less positive than the others because it is more remote from the town centre.
15 - Employment	+	+	+	All site options would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	+	All site options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✗	✓	?	
Whilst option (a) performs relatively positively against the sustainability objectives, it is a small-site within the built-up area and may progress as a 'windfall' site (there has been planning history to suggest this is the case). Option (b) performs positively overall against the Social objectives, plus site promoters have been able to suggest mitigation that would reduce the impact on the Environmental objectives. As Haywards Heath is a Category 1 settlement, the sustainability benefits to this site mean it is suitable for allocation. Whilst option (c) performs very positively against the Social objectives due to its size and scale, it is significantly beyond the residual need within this settlement. There are very negative impacts expected for the Land Use objective, as well as negatives related to biodiversity (due to the areas of ancient woodland within the sites and adjacency to a wildlife site). Therefore, at this stage it is not proposed that this site is required to meet the need of Haywards Heath or Category 1 as a whole, however may be required should this need be unmet following assessment of all sites within this category.				

Looking in more detail at the actual distances from services and facilities. The location of key services has been measured from the centre of the Golf Course site and is summarised in Table 1:

Table 1: Distances to Local Services and Amenities (measured from the centre of the site)

Service	Location of Provider	Distance
Education	Blackthorn Community Primary	2.1 km
	Lindfield Primary Academy	2.2 km
	Harland Primary School	2.4 km
	Oathill Community College	1.8 km
	Warden Park Academy	4.3 km

Health Facilities	Lindfield Medical Centre	2.1 km
	Haywards Heath Health Centre	2.7 km
Village Centre	The Co-operative Food, Lindfield	2.1 km
Town Centre	Waitrose, Haywards Heath	2.3 km
Public Transport	Bus service 30, Sunte Avenue	1.1 km
	Haywards Heath Railway Station	2.3 km

The Sustainability Appraisal states a 15 minute walk is 1.2km and on that basis a 20 minute walk would be 1.8km. Using these measurements all the services are over 20 minutes walk away save for one bus stop.

The scores given for Health, Education and Retail are incorrect and should all be scored red.

We would also raise a question with regard to the regeneration score as the Golf Course site is as set out above 2.3km (20-25 minutes walk) from the Town Centre.

We request that the information in the Sustainability Appraisal be reviewed as a matter of urgency. We would be happy to provide the Council with additional information in relation to these points.

3.4. Transport Issues

3.4.1. Pedestrian Infrastructure

The principal pedestrian route from the site towards Haywards Heath town centre, Lindfield village centre, the railway station, medical centres and the nearest primary schools would be from the site access along part of High Beech Lane and Portsmouth Lane. Both these streets have one footway on the west side of the road and it is approximately 1.5 to 1.7m width for a length of 650m to the junction with Gander Hill and Sunte Avenue.

This restricted footway width is below the standard of 2.0m recommended in the department for Transport's Manual for Streets. Widening this sub-standard footway may not be achievable within the existing highway boundary. The poor quality of the existing pedestrian infrastructure may deter pedestrians walking to and from the site and consequently increase the number of car trips generated by the site.

3.4.2. Public Transport

The nearest bus stop is in Sunte Avenue, 1.1 km from the centre of the site. Bus service 30 provides a circular service serving Lindfield, Hayward Heath town centre, the railway station terminating at Ridgeway to the south of Haywards Heath. The service operates hourly through the day Monday to Saturdays finishing at 18:00. There are also four early morning services linking Lindfield and Haywards Heath between 06:39 and 07:25 that could serve the railway station.

3.4.3. Road Safety

In terms of the impact of the site on local highway network, the junction of Portsmouth Lane/Sunte Avenue/ Summerhill Lane/ Gander Hill is likely to receive additional traffic. Over the most recent five year period, there have been seven personal injury accidents of which two were classed as serious. The existing junction consists of a four-arm mini-roundabout with a slip lane between the northern and eastern arms.

It is noted that the junction layout provides little horizontal deflection to traffic. This is an acknowledged feature of mini-roundabouts with more than three arms. The only pedestrian facilities are on the western and southern arms which consist of narrow pedestrian refuges.

In view of the junctions record of collisions and lack of facilities for pedestrians, mitigation and safety improvements at this junction may be required as part of a traffic mitigation measures associated with any application for the Golf Course site.

3.4.4. Strategic Highway Modelling

As part of the preparation for the Site Allocations DPD, MSDC commissioned consultant SYSTRA to build a strategic highway model to test various development scenarios up to 2031. Eight scenarios were tested, some of which included the Golf Course site.

The combination of public transport, active travel and highway improvements are predicted to resolve all but two of the 'severely' impacted junctions:

- A272/ B2036, Ansty
- A23/ A2300 Southbound on-slip

SYSTRA recommend further work to be undertaken to examine ways to reduce the impact of the proposed S&T Park on the A2300.

3.4.5. Transport Impact of Developing Hayward Heath Golf Course

The strategic modelling undertaken for MSDC has assumed that a range of mitigation measures could be used to reduce severe impacts of the cumulative sites on the highway network. These include promoting active travel, such as walking and cycling for more local journeys. The success of these active travel initiatives are influenced by the distance of the site from local amenities and the quality of the pedestrian infrastructure provided. As the Haywards Heath Golf Club site is 2.3 km from the town centre this presents a significant deterrent to walking trips. This is also compounded by the sub-standard width of the footways in the vicinity of the site that could further deter regular walking to and from the town centre and railway station.

3.5. Local Plan policies

We understand the Site Allocation DPD needs to be in line with the policies as set out in the adopted Local Plan 2018. Attention is drawn to the following Strategic Objectives of the Local Plan

3) To protect valued landscapes for their visual, historical and biodiversity qualities;

4) To protect valued characteristics of the built environment for their historical and visual qualities;

5) To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes;

11) To support and enhance the attractiveness of Mid Sussex as a visitor destination; and

15) To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.

Allocation of the golf course site would unquestionably be at odds with all of these objectives which form the basis of the Local Plan.

4) Conclusion

The Council's preferred option 2 is fully supported. Notwithstanding that there are clearly more sustainable sites in the right places available for allocations, the Haywards Heath Golf Club site is not appropriate for development as set out in the DPD and for the additional reasons given above.

1432

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA11

ID: 1432

Response Ref: Reg19/1432/1

Respondent: Mr J Moore

Organisation:

On Behalf Of:

Category: Resident

Appear at Examination? x

Name	James Moore
Address	[REDACTED]
Email	[REDACTED]
Which document are you commenting on?	Site Allocations DPD
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	Yes
(1) Positively prepared	Sound
(2) Justified	Sound
(3) Effective	Sound
(4) Consistent with national policy	Sound
Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD	I strongly support the plan's exclusion of the Haywards Heath Golf Club development proposal from the Site Allocations DPD
If you wish to provide further documentation to support your response, you can upload it here	
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	No, I do not wish to participate at the oral examination
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	26/08/2020

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA11

ID: 1443

Response Ref: Reg19/1443/4

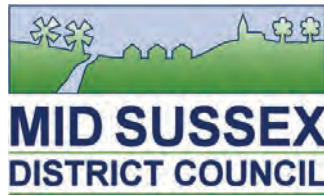
Respondent: Mr J Pearson

Organisation: Lewis & Co Planning

On Behalf Of: Mr Chris Gargan

Category: Promoter

Appear at Examination? x



Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

Please return to Mid Sussex District Council by midnight on 28th September 2020

How can I respond to this consultation?

Online: A secure e-form is available online at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

Post: Mid Sussex District Council
Planning Policy
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Joseph"/>
Last Name	<input type="text" value="Pearson"/>
Job Title (where relevant)	<input type="text" value="Senior Planning Consultant"/>
Organisation (where relevant)	<input type="text" value="Lewis & Co Planning"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Mr Chris Gargan"/>
Address Line 1	<input type="text" value="2 Port Hall Road"/>
Line 2	<input type="text" value="Brighton"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="BN1 5PD"/>
Telephone Number	<input type="text" value="01273 413700"/>
E-mail Address	<input type="text" value="Joseph.pearson@lewisplanning.co.uk"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Mr Chris Gargan

3a. Does your comment relate to:

Site
Allocations
DPD

☒

Sustainability
Appraisal

☒

Habitats Regulations
Assessment

Community
Involvement
Plan

☐

Equalities
Impact
Assessment

☐

Draft Policies
Maps

☐

3b. To which part does this representation relate?

Paragraph

Policy SA

10 + 11

Draft Policies Map

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.

Yes

☐

No

☒

4b. Sound

Yes

☐

No

☒

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected '**No**' to either part of question **4** please also complete question **6b**.

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

See supporting letter for full details. We do not consider that reasonable alternatives have been suitably assessed through the preparation process

The DPD has not been positively prepared or justified and as a result is not effective or consistent with national policy as more suitable and sustainable development sites have been excluded without good reason.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Our client's site at Maltings Farm has not been appropriately considered for allocation and is a better suited site for residential development than those allocated within the DPD. A full and accurate assessment of the site should be undertaken rather than excluding the site as part of a wider 'broad location'.

See supporting letter for further details.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The current evidence base currently fails to provide any accurate assessment of our client's site as a potential housing site, despite previous submissions advising of its availability, merits and suitability. Without this assessment our contributions are likely to be limited to the points already raised in our written representations. However, if the Council were to undertake such an assessment then we would welcome the opportunity to discuss these matters at examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

☒

(ii) The publication of the recommendations from the Examination

☒

(iii) The Site Allocations DPD is adopted

☒

Signature:

Joseph Pearson

Date:

10/09/2020

Thank you for taking time to respond to this consultation

Planning Policy
Mid Sussex District Council
Oaklands Road
Haywards Heath
RH16 1SS

Sent by email only to: LDFconsultation@midsussex.gov.uk

10th September 2020

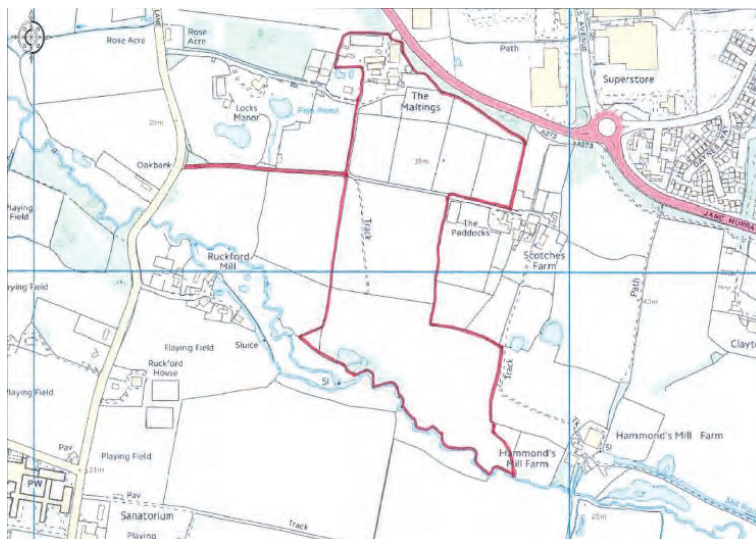
Dear Sir/Madam,

Site Allocations DPD Consultation

Thank you for the opportunity to comment on the Site Allocations Development Plan Document. We write to you on behalf of Mr C Gargan the landowner of the site Land at Maltings Farm, Burgess Hill, BN6 9JZ.

The site adjoins the built-up area boundary of Burgess Hill to the south-west of the settlement and is available for new residential development.

Mr Gargan owns approximately 21ha of land between Jane Murray Way and Malthouse Lane as shown on the enclosed location plan. Given the proximity of the Burgess Hill settlement boundary and the excellent highway links provided by the A273, the site has genuine potential to make a significant contribution to housing provision in the district.



Site Location Plan

Summary

We consider that our client's site at Maltings Farm provides a sustainable location for growth that has not been appropriately considered throughout the preparation of the Site Allocations DPD and offers a more sustainable strategy for meeting the District's residual housing needs.

Our client's site was considered for allocation as part of a large 'broad location' around the western boundary of Burgess Hill (site reference 740). The entirety of this area was excluded from consideration at early stages of the preparation of the DPD, as set out in Site Selection Paper 1. The justification given was that the size of a site within this broad location would "deliver levels of growth significantly beyond that required by the District Plan strategy".

This clearly ignores the fact that broad locations are not necessarily meant to be considered for allocation in their entirety. It has resulted in an area considered suitable for development within the Council's SHELAA being excluded from consideration for allocation with no further assessment of individual sites/areas within that broad location. The Maltings Farm site is one such location where a smaller development could be considered that would be wholly compliant with the District Plan strategy and can better meet the objectives of the Site Allocations DPD than other sites proposed for allocation.

We consider that the proposed submission documents fail to meet the legal requirements for the Sustainability Appraisal and the tests of soundness in terms of the Site Allocations DPD's justification, effectiveness and consistency with national policy.

Site Description

Our client's site is located on the south-western edge of Burgess Hill. The site is currently in use as a livery yard but this business is in the process of closing down its operations and has run at a loss and been subsidised by the owner for many years.

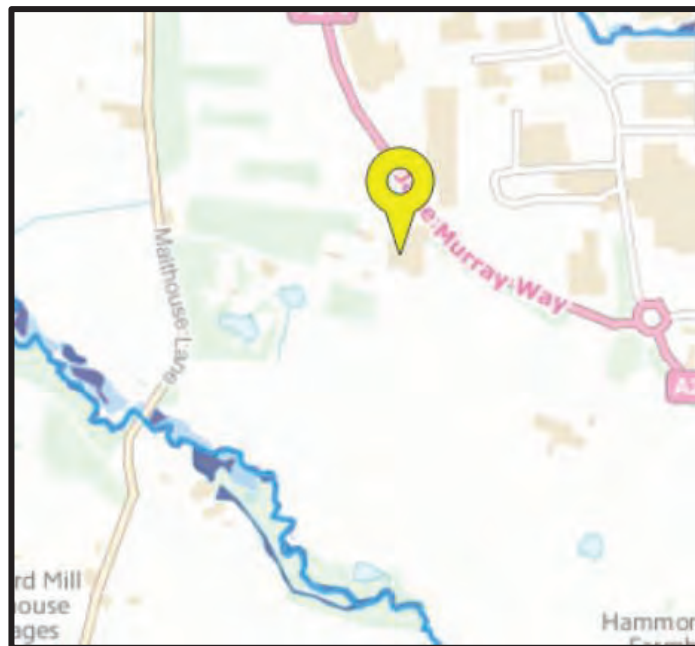
The primary site access is currently from Malthouse Lane with access currently available on foot to Jane Murray Way and opportunities for a revised vehicle access under a comprehensive redevelopment of the site. The Burgess Hill Green Circle Route runs along the northern edge of the site but the site's existing arrangement creates a narrow pinch point for the route that could be significantly improved as part of a future development. The Green Circle route is protected by District Plan policies and its improvement and extension form one of the key principles for new development at Burgess Hill – as set out in Policy DP7.

Burgess Hill is one of three category 1 settlements with a wide range of services and two railway stations and continues to be a focal point for sustainable growth through urban extensions to the settlement. Although in reasonably close proximity to the South Downs National Park to the southeast, the remainder of the settlement and its outskirts are in a relatively unconstrained part of the District that offers greater opportunities for sustainable development than other areas.

As set out above, the entirety of the land is 21 hectares. The area could therefore accommodate any size of residential development, alongside other wider improvements such as extensions to the Green Circle network, ancillary commercial uses or services and/or new routes through and out of the site. Neighbouring properties are residential and a residential-led development is most appropriate in this location.

The site forms part of a large broad location considered in the initial Site Selection process as site reference 740. This area was identified as offer a wide range of 'major positive impacts'.

Unlike the larger broad location, our client's site is in single ownership, available for development and existing uses onsite have only a short term future. The Land to the West of Burgess Hill site assessment in the Site Selection Paper (EP23/EP23a) identifies listed buildings within the broad location, but none are within our client's land. Similarly, the broad location receives a negative on flood risk but our client's land is almost entirely within Flood Zone 1:



Flood Map for Planning Extract

The Site Selection Paper assessment raises concerns that the development of the Site 740 area alongside the strategic Northern Arc development due to their close proximity, but the area of Site 740 within our client's control is a significant distance away from (over a kilometre at the closest point) – comparable to the distance between the Northern Arc and land at Kings Way (also allocated within the District Plan).

On this basis, our client's land is clearly significantly less constrained, and has no issues to deliverability, compared to the wider broad location assessed. The failure of the local planning authority to consider specific unconstrained areas of the broad location results in an ineffective assessment of all reasonable alternatives to development at Burgess Hill.

We ask that the examining Inspector require the local planning authority to undertake further evaluations of site options, including a rigorous assessment of our client's site and the unique opportunities that would be provided through its development. None of the stated constraints or concerns with the wider broad location are directly applicable to our client's site and there are clear positive benefits that allocation would provide. The land within our client's control could accommodate a significant amount of housing, or a smaller residential development focused within the northernmost areas of the site, but at a scale more suited to the scale of development the local planning authority wish to deliver through the Site Allocations DPD.

The site scores very favourably against identified environmental criteria and adjoins the settlement boundary. The site is unaffected by flood risk, would not affect any designated heritage assets, ancient woodland, SSSIs, local nature reserves, or other notable constraints.

Whilst the site is clearly appropriate for new housing development, failure to allocate the site for a larger quantum of development would likely result in the site coming forward as a windfall site of 9 units or less – at most. This would be an inefficient use of the site, would not generate a requirement for affordable housing types and may prevent the District Council from securing infrastructure contributions. Support through a specific allocation in the Site Allocations DPD would make the proposals an exception to District Plan Policy DP12 and would allow a better-quality development to proceed in principle.

Proposed Submission Site Allocations DPD

The Site Allocations DPD seeks to allocate new housing land to meet what is described as the District's 'residual' housing need to 2031. However, the clear backdrop to this document is an urgent need for additional housing across the sub-region – with unmet need in neighbouring authorities highlighted under Policy DP5 of the District Plan.

Whilst a future review of the Plan is expected to address this unmet sub-regional need, it is evident that the Site Allocations DPD should deliver new housing wherever it is appropriate and sustainable to do so, as the issues of unmet needs in neighbouring authorities worsen. This document cannot be considered in a vacuum and its soundness must be considered in the context of present-day evidence of housing needs.

The Government's housing delivery test provides reliable evidence that of the five of the eight local authorities within the Coastal West Sussex and Greater Brighton Strategic Planning have failed to deliver their minimum housing requirement over recent years (in addition to the unmet need not addressed through their Local Plans). This under-delivery will further exacerbate the scale of unmet needs across the sub-region identified through the District Plan and the social and economic sustainability impacts of failing to adequately address these needs.

There is therefore an evidenced need for additional housing development where appropriate sites are available to meet this wider unmet needs within the Coastal West Sussex and Greater Brighton sub-region. The authorities struggling to deliver their minimum housing

requirements include Adur (56% delivered), Brighton (70% delivered) and Lewes (93% delivered) – those authority areas closest to our client's site.

In addition to these needs across relevant housing market areas, the proposed new Standard Method for housing need shows that the District Plan strategy still has an under-provision of housing as the figures show an annual increase in housing need of 191 homes a year in Mid Sussex alone. Across the wider housing market areas that affect Mid Sussex the shortfall is more pronounced, with a 1,108 home shortfall (per annum) in the North West Sussex area alone (Crawley, Horsham and Mid Sussex) and a further 2,039 home shortfall (per annum) across the Coastal West Sussex area.

Although the Site Allocations DPD is not intended to provide a full review of the District Plan housing strategy, these objective facts provide an up-to-date background of the worsening housing crisis that is affecting the local area. Much of this information has been available to the local planning authority through the preparation of the DPD and should have informed the decisions being made on the Site Allocations DPD itself through the Sustainability Appraisal and assessment of alternatives. This is discussed further below.

Sustainability Appraisal

The DPD states that 'reasonable alternatives' were assessed through the Sustainability Appraisal. We do not consider that our client's site has been robustly considered as the negatives identified within the assessment of Broad Location Site 740 are not applicable to our client's land.

The Sustainability Appraisal assessment of the site therefore poorly reflects actual performance against sustainability objectives and this flawed assessment likely leads to the flawed conclusion of excluding the site from further assessment.

The Council have not rigorously considered the reasonable alternative of allocating more of, or all 'suitable' sites. Their reasons for rejecting this alternative are that:

- The District Plan supports a minimum requirement of 16,390 homes throughout the Plan period, and a significant increase in housing delivery *may* not be supported by the existing evidence base
- Allocating additional housing is not in accordance with the District Plan strategy
- There *may* be negative in-combination effects

These conclusions are not based on any evidence and don't demonstrate any genuine attempt to investigate whether this approach could lead to any of the negative effects described in this section of the Sustainability Appraisal. We would expect to see an actual assessment of the in-combination impact of allocating all suitable sites within each settlement – especially given the significant amount of work already invested into the site selection process. We doubt that any 'in-combination' adverse impacts would genuinely outweigh the

benefits of additional housing delivery (particularly given the known under-delivery of housing across many neighbouring local authority areas).

A slightly more robust assessment of these considerations would likely result in different policy outcomes and the Site Allocations DPD (subject to similar scrutiny to the District Plan) provides a reasonable opportunity to reconsider some of the evidence base that underpins the District Plan strategy.

It may well be the case that in some settlements the in-combination effects would be significant enough to outweigh the benefits of allocating all but the assumptions given for ruling out the allocation of additional or larger sites are broad and generalised and this position has not been justified.

Conclusion

We believe that the site clearly presents a positive opportunity for residential development at Burgess Hill and the allocation of the site would positively contribute to the objectives of the District Plan. The assessment of the site has not been sufficient for it to be robustly considered as a reasonable alternative location for development. The stated reasons for excluding the 'West of Burgess Hill' Broad Location (Site 740) are not relevant to our client's site when considered in isolation.

We consider that the Site Allocations DPD is therefore not justified, effective or consistent with national policy in this regard and a further evaluation of available sites within the District should be undertaken to establish the most sustainable locations for new residential development.

Lewis & Co Planning would welcome the opportunity to discuss these matters in greater detail. Please contact Joseph Pearson or Simon Bareham on 01273 413700.

Yours faithfully,

Lewis & Co Planning
Joseph.pearson@lewisplanning.co.uk

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA11

ID: 1454

Response Ref: Reg19/1454/5

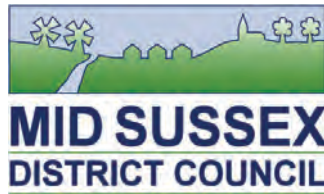
Respondent: Mr S Brown

Organisation: Woolf Bond Planning

On Behalf Of: Fairfax Acquisition Ltd - Land east of Borde Hill
Lane, HH

Category: Developer

Appear at Examination? ✓



Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

Please return to Mid Sussex District Council by midnight on 28th September 2020

How can I respond to this consultation?

Online: A secure e-form is available online at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

Post: Mid Sussex District Council
Planning Policy
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

Title	Mr
First Name	S
Last Name	Brown
Job Title (where relevant)	Principal
Organisation (where relevant)	Woolf Bond Planning (Agent)
Respondent Ref. No. (if known)	
On behalf of (where relevant)	Fairfax Acquisition Ltd
Address Line 1	c/o Agent
Line 2	The Mitfords
Line 3	Basingstoke Road
Line 4	Three Mile Cross, Reading
Post Code	RG7 1AT
Telephone Number	01189 884923
E-mail Address	s.brown@woolfbond.co.uk



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Fairfax Acquisition Ltd

3a. Does your comment relate to:

Site
Allocations
DPD

☒

Sustainability
Appraisal

☐

Habitats Regulations
Assessment

☐

Community
Involvement
Plan

☐

Equalities
Impact
Assessment

☐

Draft Policies
Maps

☐

3b. To which part does this representation relate?

Paragraph

Policy SA

10

Draft Policies Map

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.

Yes ☒

No ☐

4b. Sound

Yes ☐

No ☒

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected '**No**' to either part of question **4** please also complete question

See attached representations.

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

See attached representations.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached representations.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to discuss the soundness of the SADPD having regard to the most up to date information available

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination



(ii) The publication of the recommendations from the Examination



(iii) The Site Allocations DPD is adopted



Signature:

Woolf Bond Planning

Date:

10th September 2020

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Paragraph

Policy SA

11

Draft Policies Map

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Yes ☒

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Paragraph

Policy SA

21

Draft Policies Map

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The Proposals Map for Haywards Heath should be amended to include the allocation of land east of Borde Hill Lane as a housing allocation. See attached representations.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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Signature:

Woolf Bond Planning

Date:

10th September 2020

Thank you for taking time to respond to this consultation



Woolf Bond Planning

Chartered Town Planning Consultants

WBP Ref: SB/8160

BY EMAIL

Email: s.brown@woolfbond.co.uk

10th September 2020

Site Allocations DPD Consultation
Planning Policy Team
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Dear Sirs,

MID SUSSEX DISTRICT COUNCIL – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT – REGULATION 19 SUBMISSION DRAFT CONSULTATION

THE OMISSION OF LAND AS A HOUSING ALLOCATION TO THE EAST OF BORDE HILL LANE, HAYWARDS HEATH

REPRESENTATIONS ON BEHALF OF FAIRFAX ACQUISITION LTD

INTRODUCTION

Background

We refer to the above Regulation 19 consultation and respond on behalf of our client, Fairfax Acquisition Ltd, setting out our comments upon certain of the draft policies and proposals contained therein, including the **omission of land under their control to the east of Borde Hill Lane, Haywards Heath, as a housing allocation for circa 130 dwellings.**

The Site comprises an available, suitable and deliverable opportunity to accommodate housing needs (both market and affordable), in a sustainable location, within walking distance from the town centre, with no landscape and/or technical constraints to bringing the land forward for development in the early stages of the plan period, and/or in helping to demonstrate a five year supply of deliverable housing land.

The site extends to approximately 9ha and the illustrative masterplan accompanying our representations suggests how a scheme for circa 130 dwellings could be accommodated on the site at net density of approximately 30dph.

The Site has inherent sustainability merits which make it suitable for residential development, and in our view represents a logical development opportunity in providing much needed new homes in a location that is contiguous and well related to existing built form on the western edge of Haywards Heath, within walking and cycling distance from the town centre.

For the reasons set out in our submissions there are a number of shortcomings with the draft Site Allocations Development Plan Document (“SADPD”) that result in the need for amendments if it is to satisfy the tests of soundness at paragraph 35 of the NPPF.

Our representations focus on specific parts of the SADPD as follows;

- **SA10: Housing**
- **SA11: Additional Housing Allocations**
- **SA21: Land at Rogers Farm, Fox Hill, Haywards Heath**
- **Omission of land to the east of Borde Hill, Haywards Heath as a housing allocation**

Our detailed representations are set out below and include submissions in response to the content of certain of the evidence base documents, including the Sustainability Appraisal.

SUPPORTING PLANS AND PARTICULARS

The following plans and documents are submitted in support of our representations:

- Site Location Plan No. 2043/PA.01
- Opportunities and Constraints Plan No. 2043/PA.02A
- Indicative Masterplan No.2043/PA.03B
- Highways and Access Sustainability Technical Note (Aug 2020) (i-Transport)
- Landscape and Visual Appraisal (Aug 2020) (Fabrik)
- Ecological Technical Note (Aug 2020) (The Ecology Co-op)
- Flood Risk and Drainage Technical Note (Sept 2020) (Temple)

The content of the supporting plans and particulars is set out below where relevant to the particular issue/discipline being addressed.

Overarching Position

Fairfax Acquisition Ltd has a strong belief in the principle of the plan-led system and in setting out our representations upon the aforementioned policies, we hope to be able to work with the Council (including through the preparation of proposed modifications) in order to ensure the SADPD satisfies the tests of soundness at paragraph 35 of the NPPF.

Fairfax Acquisition Ltd and Woolf Bond Planning have considerable experience in dealing with the promotion of sites through the planning system. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated; which strategy is predicated upon unrealistic assumptions about delivery at certain of the strategic site allocations identified in the adopted District Plan.

Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain

policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

We are keen to ensure that the SADPD is robust and it is in this context that we set out our representations, with the omission site affording a sustainable option as a housing allocation in seeking to ensure a sound Plan pursuant to the requirements at paragraph 35 of the NPPF.

THE NPPF AND THE TESTS OF SOUNDNESS

The NPPF sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be “sound” a Development Plan Document (‘DPD’) should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure needs, both within the authority area and from neighbouring authorities. In respect of housing, the need must be informed by a local housing needs assessment, conducted using the standard method (para. 60).

Paragraph 69 of the NPPF sets out the requirement for Local Planning Authorities to establish a housing requirement figure for their whole area, broken down into neighbourhood areas.

In identifying land for homes, paragraph 67 of the NPPF requires LPA’s to identify a sufficient supply and mix of sites.

For the reasons set out below, we are of the view that the SADPD cannot be said to be justified when the strategy for site selection is considered in relation to the reasonable alternatives; including the omission of land to the east of Borde Hill Lane, Haywards Heath as a housing allocation.

We expand upon our submissions in the detailed considerations that are set out below.

POLICY SA10: HOUSING & POLICY SA11: ADDITIONAL HOUSING ALLOCATIONS

Representations

The Housing Requirement and Plan Period

As set out at paragraph 2.17 of the SADPD, the District Plan 2014-2031 (adopted March 2018) sets out the housing requirement to be met in the District during the plan period, with Policy DP4 setting out a requirement for a minimum of 16,390 dwellings.

Policy DP4 also commits the Council to adopting the SADPD in 2020, with a requirement for circa 2,439 dwellings to be allocated through the SADPD and Neighborhood Plan process.

This figure represents the residual requirement to be met following allowances in Policy DP4 for commitments, strategic allocations and a windfall allowance.

Policy DP4 includes a table which sets out the spatial distribution of the overarching housing requirement. The majority of the planned housing growth is to be met at the three largest and most sustainable settlements¹ (Burgess Hill, East Grinstead and Haywards Heath).

The supporting text to Policy DP4 states as follows:

“The District Council will prepare a Site Allocations Development Plan Document (DPD). This will allocate non-strategic and strategic sites of any size over 5 dwellings (with no upper limit), in order to meet the remaining housing requirement over the rest of the Plan period as reflected in the ‘stepped trajectory’ of 876dpa until 2023/24 and 1,090dpa thereafter, and with the aim of maintaining a 5 year land supply to meet this requirement. Town and parish councils may also bring forward revisions to their Neighbourhood Plans.” [Our emphasis underlined]

Whilst there is a minimum residual housing figure specific for each category of settlement to be met from 2017 onwards, including through preparation of the SADPD, a principal aspect is the need to ensure deliverable sites are identified in order to help demonstrate a five year supply of deliverable housing land. In addition, and for the reasons set out in the NPPF, the approach to site selection needs to ensure the sites provide for sustainable development. This includes, inter alia, allocating sites for housing that can provide opportunities for travel by sustainable modes.

Proposed Allocations

As set out at paragraph 2.24 of the SADPD, the District Plan allocates four strategic site allocations which make provision for circa 5,080 dwellings during the plan period to 2031; including some 3,400 dwellings to the north and north-west of Burgess Hill.

However, and as set out at paragraph 2.27 of the SADPD, the Council has reduced its expectations of housing delivery at the Burgess Hill strategic allocation from 3,500 to 3,287 dwellings within the plan period. Subject to future delays, there could be a significant under delivery of housing. Accordingly, and as set out in Policy SA10, it seems sensible for the SADPD to plan for a greater number of dwellings, as a contingency, in the event the strategic sites and other commitments fail to deliver at the point envisaged. This will help to ensure a flexible and responsive approach to housing supply/delivery.

Based upon the completions realised since 2014 (the start date of the Plan), the number of identified commitments and the windfall allowance relied upon by the Council, Policy SA11 of the SADPD allocates new sites for circa 1,764 dwellings. It is suggest this will result in a surplus of 484 dwellings as follows:

A. Minimum Requirement 2014 to 2031	16,390
B. Completions 2014 to 2020	4,917
C. Commitments	9,689
D. Windfall Allowance	504
E. Residual Requirement (A-(B+C+D))	1,280

¹ Category 1 settlements as defined in Policy DP6

The SADPD seeks to allocate 22 sites for approximately 1,764 dwellings, which results in a 'surplus' of 484 dwellings (1,764-1,280) against the 16,390 minimum requirement to be met during the plan period.

Whilst it is acknowledged that the Council is committed to undertaking a review of the District Plan, it is imperative that the SADPD process ensures the delivery of sufficient dwellings in helping to meet the minimum 16,390 requirement specific in the District Plan.

The 'surplus' of 484 dwellings leaves little if any room for error in the Council's delivery assumptions on commitments, including the strategic sites.

Accordingly, **we are of the view that the SADPD should allocate additional sites, where demonstrated to be both deliverable and sustainable.** This is the case with our client's land to the east of Borde Hill Lane, Haywards Heath, the merits of which we elaborate upon below.

The allocation of additional sites, in seeking to plan for in excess of the 1,764 dwellings in the Reg. 19 SADPD was positively assessed under Option C of the Sustainability Appraisal, with the impacts (positive and negative) broadly commensurate with those assessed against the 1,764 figure.

Distribution of the Proposed Housing Allocations in Policies SA10 and SA11

Policies SA10 and SA11 sets out how the allocation of land for circa 1,764 dwellings is to be allocated to the settlements within Mid Sussex.

As set out above, Burgess Hill, East Grinstead and Haywards Heath are identified in Policy DP4 of the District Plan² as the three most sustainable settlements within Mid Sussex. However, and despite the District Plan already providing for strategic growth at Burgess Hill (in the form of a 3,500 dwelling strategic allocation), the SADPD proposes a further 612 dwellings at the settlement (35% of the 1,764 total in the SADPD), with 772 proposed at East Grinstead (44%) and only 25 dwellings (1.5%) at Haywards Heath.

This strategy demonstrably fails the tests of soundness at paragraph 35 of the NPPF as it cannot be said to be justified in the context of the sustainability merits afforded by Haywards Heath.

As an overarching comment in relation to the tests of soundness, including based upon the findings of the Sustainability Appraisal to the SADPD, additional housing allocations should be identified at Haywards Heath (i) in place of certain of the sites allocated at Burgess Hill and/or East Grinstead; or (ii) in addition to the 1,764 figure in order to ensure a flexible and responsive supply of housing land.

Land to the east of Borde Hill Lane, Haywards Heath should be allocated for approximately 130 dwellings together with associated open space.

Moreover, sites proposed to be allocated at the lower order category 2, 3 and 4 settlements should not be allocated ahead of more sustainable options at Haywards Heath (a category 1 settlement).

² Supported by the conclusions of the Site Selection Paper (July 2020) and the Sustainability Appraisal to the SADPD (July 2020)

POLICY SA21: ROGERS FARM, FOX HILL, HAYWARDS HEATH

Representations

This site is not as sustainably located as the opportunity afforded by our client's site on land to the east of Borde Hill Lane, Haywards Heath.

Policy SA21 should be deleted in favour of our client's land; or, if additional sites are proposed, our client's site could be allocated as an additional allocation at Haywards Heath, with Rogers Farm being retained.

The latter option would in part address the imbalance in the distribution of dwelling numbers advocated by the Council in Policies SA10 and SA11.

OMISSION SITE

SUITABILITY OF LAND TO THE EAST OF BORDE HILL LANE, HAYWARDS HEATH AS A HOUSING ALLOCATION FOR APPROXIMATELY 130 DWELLINGS

Representations

General

We object to the omission of land to the east of Borde Hill Lane, Haywards Heath as a housing allocation for circa 130 dwellings.

The site extends to approximately 9ha and comprises an area of pastoral field(s) to the east of Borde Hill and north of Balcombe Road.

The surrounding area is characterised by residential development, including the scheme for 210 dwellings under construction by Redrow at Penlands Farm to the west (LPA Ref: DM/16/1803). Following the grant of planning permission for development at Penlands Farm, there has been a clear acceptance of the principle of developing land to the west of Basingstoke Road.

On the basis of the above, and the technical work submitted in respect of highway/sustainability, landscaping (and heritage), ecology and flooding and drainage matters, we consider the site affords an inherently sustainable and deliverable location to accommodate housing in helping to meet identified needs during the plan period.

Although close to the High Weald AONB and Borde Hill Registered Park and Garden (thus sharing a similar relationship in this regard to the approved development at Penlands Farm), the Site is not subject to any statutory or non-statutory designations for landscape quality or nature conservation interests; whilst all heritage assets in the vicinity of the site have been assessed as part of the technical work undertaken to assess the suitability of the site for housing; and which findings have informed the design approach adopted in the evolution of the illustrative masterplan.

The Illustrative Masterplan proposes circa 130 dwellings on a net developable area of approximately 5ha – with approximately 4ha proposed as landscaped open space.

Highways and Sustainability

The accompanying Technical Note prepared by i-Transport explains the locational advantages of the Site as well as the means of access, which matters are summarised below:

- The site is well located with respect to public transport services. In addition to bus services, the site is circa 1,500m from Haywards Heath railway station. Being situated on the Brighton Main Line, the station offers excellent services to a range of destinations including Central London, Gatwick Airport and the South Coast with circa one train every six minutes routing towards Central London/Gatwick Airport at peak times.
- The site location, the accessibility to local facilities within walking and cycling distance, and the accessibility to public transport would result in a development which would provide genuine opportunities to promote sustainable transport.
- Access to Land at Borde Hill Lane would be via the introduction of a fourth arm to a roundabout which will provide access to the Penland development opposite. The access arrangements, which are shown on Drawing ITL14572-GA-001, would provide safe and suitable means of access for all and enable the accessibility benefits of the site location to be realised.
- The CIHT Planning for Walking guidance document (April 2015) acknowledges that circa 80% of journeys up to 1mile (1,600m) are made wholly on foot. Furthermore, the average distance of pedestrian journeys is 0.85mi (1,360m) (Ref: Planning for Walking, Section 2).
- The results of the National Travel Survey 2019, published August 2020, corroborates these findings and identify that walking is the most frequent mode used for short trips – 80% of trips under one mile (c. 1,600m) and almost one-third (31%) of trips between one and two miles (c. 3,200m) were on foot (Ref: NTS Table 0308).
- A summary of local facilities and services, the distance of these from the site, and approximate walking and cycling journey times, is provided in Table 2.1, and shown diagrammatically on Figure 1. This demonstrates that a significant range of services and facilities are within walking distance from the site, including Sainsbury's, Waitrose, education and leisure facilities as well as the train station.
- Key routes for pedestrian and cycle trips will be via Balcombe Road and Penland Road. Balcombe Road provides a footway of circa 2m throughout on at least one side of the carriageway to/from Haywards Heath station. Penland Road provides footways on both sides of the carriageway. Both routes are street lit with dropped kerbs/tactile paving located at junctions between the site and Haywards Heath station/town centre.
- Together, these provide a comprehensive pedestrian network to support pedestrian connectivity to the south of the site and the wider area. It is noted that footways to the south are being upgraded and extended as part of the Redrow scheme to facilitate journeys of foot to/from Haywards Heath Town Centre.
- The site is located circa 350m from a southbound bus stop on Penland Road (near junction with The Spinney). Traveline SouthEast identifies route 31a/31c operates a loop service every two hours between Uckfield and Haywards Heath, before returning to Uckfield. Additional bus services as well as rail services are available at Haywards

Heath station/Perrymount Road bus stops, 1.5km from the site. From this location, buses 3, 30, 31/31a/31c, 33/33A, 39, 62, 89, 166, 270 and 272 are accessible.

For the reasons set out above, the site affords a sustainable location in helping to meet identified housing needs.

Landscape Considerations

Landscape consultants Fabrik have undertaken a detailed appraisal of the capacity of the site to accommodate housing development in the context of the landscape characteristics of the site and surrounding area; which analysis has included an assessment of the impact of development upon the setting of the High Weald AONB and the Borde Hill Registered Park and Garden.

As set out above, development of the Site for housing would have a similar relationship to these designations as with the 210 dwellings approved by the Council at Penlands Farm to the west.

The findings of the Landscape and Visual Appraisal (“LVA”) informed the evolution of the Illustrative Masterplan, which layout responds to the advice received.

The findings of the LVA may be summarised as follows:

- An initial landscape and visual appraisal of the Site reveals that the Site is well related to the residential northern edge of Haywards Heath.
- The Site is enclosed to the north, west and east by undulating topography, woodland and trees. Furthermore, the Site boundaries are defined predominantly by vegetation that follow the alignment of the road network associated with Borde Hill Lane (to the northwest and west) and Balcombe Road to the south. This combination of features provide a mature landscape with a clearly defined northern edge to the north of Haywards Heath.
- The Site is apparent from Borde Hill Lane, in between existing dwellings, but is not readily discernible from public vantage points within the High Weald AONB and Registered Park and Garden at Borde Hill, nor is it discernible in the wider landscape due to intervening topography and vegetation. Therefore, development of the Site would not significantly alter the setting of the AONB or Registered Park and Garden.
- The Illustrative Masterplan has been informed by the advice set out within the appraisal, with the location and layout of development parameters generated by the visual and landscape character assessment.
- Overall, in landscape and visual terms, there are no significant overriding landscape constraints to the delivery of this Site for development.

Informed by the forgoing, the Site can be allocated for housing development in so far as there are no overriding landscape constraints to development of the site in the manner proposed, including on the basis that the layout can provide for a string landscape boundary to the wider landscape beyond.

Ecology

The Illustrative Masterplan has also been informed by a series of ecological appraisals, with the supporting Technical Note confirming the

The survey work undertaken to date identifies that the Site comprises largely of poor semi-improved grassland, with species-rich hedgerows, a woodland shaw and a stream that forms the north boundary.

Key features within the Site are proposed to be retained, including the retention of important hedgerows as well as an appropriate buffer to the stream along the northern boundary.

Further species surveys are being undertaken, but initial survey results confirm impacts can be mitigated through the retention and retention of on-site habitats.

Flood/Drainage

The Technical Note prepared by Temple sets out the acceptability of the proposed development of the site for 130 dwellings in flood/drainage terms, confirming that all of the proposed built form is to be located within flood zone 1.

The Design Approach

As set out above, the Illustrative Masterplan shown on Plan No. 2043/PA.03B has been informed by a range of technical studies, a number of which are summarised above and are submitted in support of our representations. These studies helped informed the Opportunities and Constraints Plan (No. 2043/PA.02A from which the Masterplan evolved.

The site is bounded by mature woodland on its north-western side and has a variety of tree and hedgerow screens elsewhere - including a mature hedge that is interspersed with trees running across the site - dividing up the area of land.

The Illustrative Masterplan follows an initial Parameters Plan that was prepared by Fabrik Landscape Architects - in particular the disposition of the developable areas which have been generated by their analysis of the views of the Site that are experienced by the receptors - most of which are close by, as the topography and vegetation ensure that the site is not readily discernible or apparent.

This is further reinforced by the setting back of the developed area - away from Borde Hill Lane, and some way down the existing slope.

The initial thoughts on the disposition of the proposed dwellings within the Site carefully follows, and is underpinned, by the principles of perimeter block typology - whereby the access roads enclose the majority of the developable areas and provide buffering to the existing landscape features and nearby units - providing a clear and legible scheme.

The majority of the proposed dwellings would face outwards towards the access roads - with the odd courtyard that allows for visual policing of car parking spaces etc.

The set-back from Borde Hill Lane allows for the access off the slightly elevated roundabout to be accommodated across the change in ground level. The access would initially terminate

in a 'T'- junction opposite a landscaped gateway area - before becoming the part of the perimeter road pattern mentioned above.

The access to the eastern most developable area is located in an existing gap in the hedgerow - so that the ecological continuity of this edge of field margin is maintained and not interrupted.

To the north-west is an area of development proposed that fronts on to Borde Hill Lane in a pattern that reflects the building alignment of nearby units.

Behind these frontage units is a 'mirrored' group of proposed houses that will ensure that the access to this area has frontage development and the nearby areas of open space are visually policed.

The bulk of the developable area is in the central section of the land being offered for inclusion in the Local Plan process. This part of the available land is bounded by the access on the western side, an existing stream on the eastern side and hedgerow or woodland areas to the north and south.

Each of the parcels of development are created by the retention of existing features - which contribute to the whole.

With regard to the embryonic proposals shown it is envisaged that the proposed site could comfortably accommodate circa 130 new homes without having an adverse impact on the neighbouring properties or the character of the wider area.

The developable area of land indicated totals approximately 4.62ha, which could generate a density of circa 30dph. This is commensurate with the Penlands Farm development that is opposite the site entrance, and it strikes a good balance between making good use of the land available whilst respecting the edge of settlement location.

The density will be influenced by the topography which, due to its incline, leads to smaller modules of built form, with detached, semi-detached or linked-detached properties being used, as they aid the stepping down the slope more readily than longer terraces would. The insertion of garages or parking areas between the dwellings aids this as they provide physical breaks that can accommodate the changes in level.

The proposed perimeter block form of development gives cohesion and legibility to a layout. In this instance the typology proposed is appropriate for the reasons stated and will allow the creation of a well-mannered development that respects the settlement edge location, whilst retaining a larger part of the site as landscape open space.

SUMMARY AND SUGGESTED CHANGES

Our client's site to the east of Borde Hill Lane, Haywards Heath, offers a deliverable opportunity for a housing scheme, in a sustainable location, within walking distance from services and facilities in Haywards Heath, which should be allocated for residential development for approximately 130 dwellings.

The allocation of the site for housing will make a valuable contribution to meeting the residual housing requirement.

For the reasons set out above, the SADPD fails the tests of soundness at paragraph 35 of the NPPF for the following reasons:

- **Unjustified** – The proposed housing distribution strategy fails to provide for sufficient housing growth at Haywards Heath, commensurate with its status as a Category 1 settlement within the settlement hierarchy. As such, the approach to the distribution and allocation of sites cannot be said to be the most appropriate taking into account the reasonable alternatives. The SADPD should allocate land our client's site to the east of Borde Hill Lane, Haywards Heath for circa 130 dwellings.
- **Ineffective** – The SADPD fails to introduce sufficient flexibility into the developable supply of housing land over the plan period. This includes a potential failure to allocate a sufficient level and variety of sites.
- **Inconsistent with the National Policy** – The SADPD fails to identify sufficient housing sites in the most sustainable locations.

We welcome the opportunity to continue dialogue with the Council in relation to the merits of the Site to the east of Borde Hill Lane, Haywards Heath as a housing allocation.

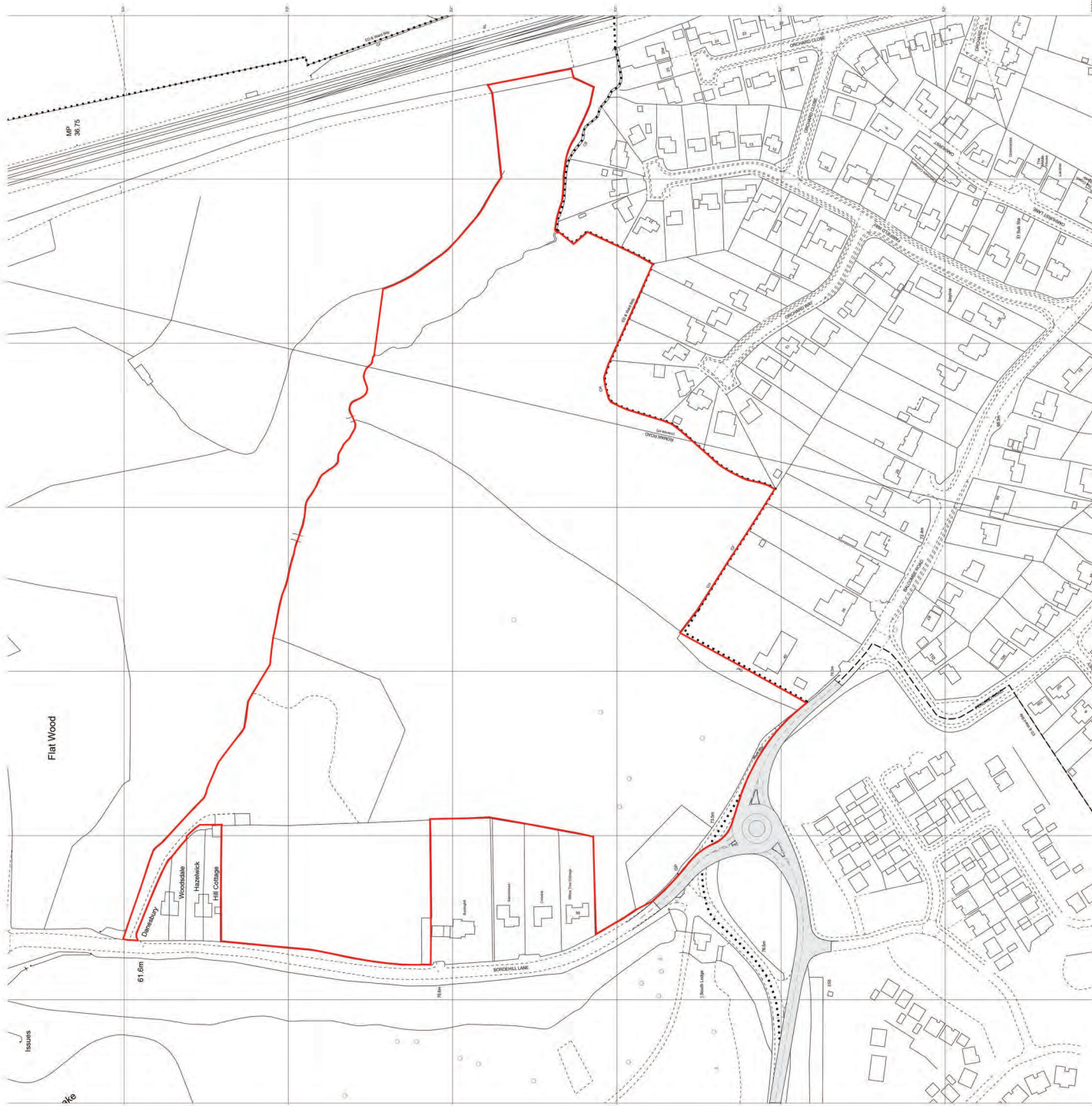
Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Yours faithfully,

Woolf Bond Planning LLP

Steven Brown BSc Hons DipTP MRTPI

Enc.



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Fairfax

FAIRFAX ACQUISITIONS LTD

project:

Land at

SUGWORTH

title:

LOCATION PLAN

date: Aug '20 scale: 1:1250 @ A1

drawing number:

Number:	Rev.
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LEGEND



Site Boundary



Existing Water Course



Proposed Footpathways



Proposed Access Locations



Listed Building



Proposed Link



Fall of Land



Railway

Fairfax

FAIRFAX ACQUISITIONS LTD

project:

Land at:

SUGWORTH

title:
INDICATIVE OPPORTUNITIES
& CONSTRAINTS PLAN

date: Aug '20 scale: 1:1000 @ A1

drawing number: 2043/PA.02
Rev. A

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PENLANDS FARM
DEVELOPMENT
(UNDER CONSTRUCTION)



LEGEND



Site Boundary & Contours



Existing Water Course



Proposed Footpathways



Proposed Access Locations



Listed Building



Railway



Storage Pond

Fairfax

FAIRFAX ACQUISITIONS LTD

project:

Land at:

SUGSWORTH

title:
INDICATIVE
MASTER PLAN

date: Aug '20 scale: 1:1000 @ A1

drawing number:	2043/PA.03
Rev.	B

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PENLANDS FARM
DEVELOPMENT
(UNDER CONSTRUCTION)

Flood Risk Assessment and Drainage Strategy

09 September 2020



Report for – Fairfax Acquisitions Ltd
Land at Sugworth, Haywards Heath
Flood Risk Assessment and Drainage Strategy – Technical Note
5013008-RDG-XX-XX-DOC-C-0502 Rev 1.0

Document version control

Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	09/09/2020	Tom Clark	Tom Clark	Paul Battersby

Report for: **Fairfax Acquisitions Ltd**

Main contributors: **Tom Clark**
 Ridge & Partners LLP

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1.0 Introduction

- 1.1.1 Temple Group Ltd on behalf of Fairfax Acquisitions Ltd has appointed Ridge and Partners LLP to provide Flood Risk and Drainage advice in respect of Land at Borde Hill Lane, Sugworth. A residential development of circa 130 dwellings is envisaged.
- 1.1.2 The site is located to the north of Haywards Heath, West Sussex; Haywards Heath railway station is situated circa 1.5km to the south east of the site. The site is bordered by rural fields to the north and east, residential properties to the south and Balcombe Road / Borde Hill Lane to the west.
- 1.1.3 The evidence in this report supports the merits of the site for potential housing development for flood risk and drainage by identifying the flood risk status of the Site and outlining a drainage strategy that would ensure no adverse impacts as a result of the Proposed Development.

2.0 Flood Zone Status

2.1 Location

- 2.1.1 The site is bounded by Borde Hill Lane to the West, a stream to the North and existing dwellings to the South and East. The nearest post code for the site is RH16 1XP.
- 2.1.2 The site is currently made up of a series of fields separated by trees and hedges. A stream forms the majority of the northern boundary of the site. The far eastern portion of the site is separated from the rest of the site by this stream.

2.2 Flood Zone map

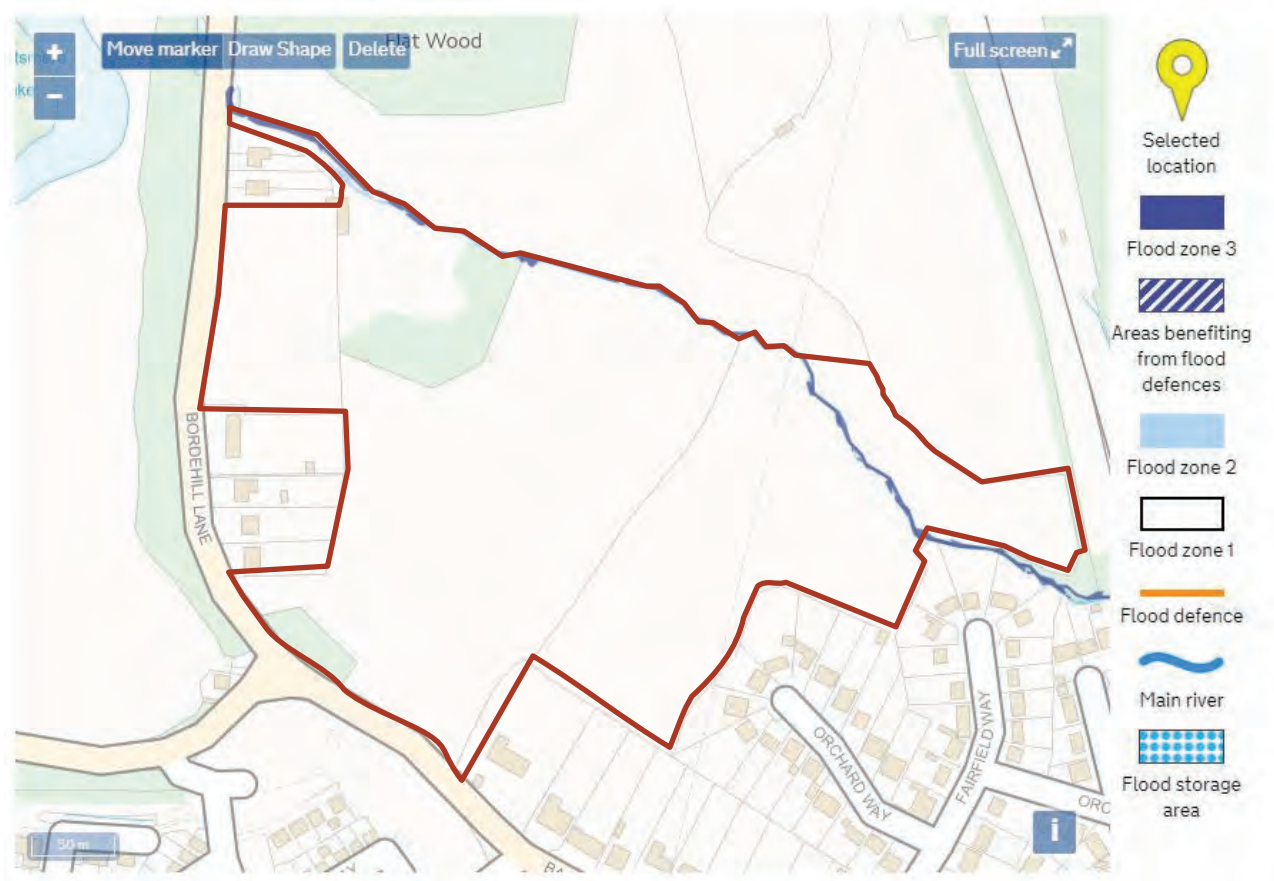


Figure 1 - Flood Zone Map extract

- 2.2.1 As confirmed by the latest Flood Zone map, the majority of the site is located within the lowest flood risk category, Flood Zone 1, see Figure 1. A small area of the site that follows the stream is classed as Flood Zone 3 and Flood Zone 2, again please see Figure 1. This area should be proposed as water compatible development such as public open space.
- 2.2.2 The mapping indicates that there are no areas which benefit from flood defences or main rivers.
- 2.2.3 Zone 1 is land as having less than 1 in 100 annual probability of flooding. Zone 2 is land as having between a 1 in 100 year to 1 in 100 year probability of flooding. And Zone 3 is land which has a probability of flooding 1 in 200 year or more frequently from the sea or 1 in 100 year probability or more frequently of flooding from rivers or streams.
- 2.2.4 The Environment Agency Flood risk maps should only be used to give an indication of flood risk as the models used to derive the zones are at a relatively large scale.

3.0 Existing Drainage Regime

- 3.1.1 The existing site does not benefit from any formal drainage networks. As such it is assumed that the surface water currently infiltrates to ground where possible and when the underlying soils become saturated and can no longer accept further rainfall, overland flows following the natural topography of the site to the stream which bounds the site to the North East.
- 3.1.2 A review of the Southern Water asset records confirms that there are no existing public sewers crossing the site.
- 3.1.3 A detailed topographical survey of the existing stream should be undertaken to understand in further detail the flow from the site to the stream.
- 3.1.4 Using the “ICP SUDS” module in Microdrainage Source control the greenfield run off values have been calculated for the site. The full results can be reviewed in Appendix A – Greenfield run off calculations.

Table 1 - Greenfield Run Off Rates

STORM RETURN PERIOD	GREENFIELD RATE (L/S)
1:1	45.4
QBar	53.4
1:30	121.1
1:100	170.4

4.0 Drainage strategy

4.1 Existing surface water run off rates

- 4.1.1 As the site is currently a green field site, the Proposed Development will need to discharge into the stream at the Greenfield run off rate of 53.4l/s

4.2 Allowance for climate change

- 4.2.1 Table 2 (Peak Rainfall Intensity Allowance in Small and Urban Catchments) of Environment Agency (2019) Flood Risk Assessments: Climate Change Allowances confirms the climate change allowance of 40% should be adopted for the site, assuming a lifespan of 100 years.

4.3 Attenuation volumes

- 4.3.1 Initial attenuation volumes have been calculated utilising Microdrainage Source Control to give an indication of the volumes of attenuation required throughout the site. Total value ranges for the 1 in 100 year + 40% climate change have been shown in the below table. The associated calculations can be seen in Appendix B – Microdrainage Storage Calculations.

Table 2 - Attenuation Volumes

CATHCMENT	POTENTIAL IMPERMEABLE AREA	DISCHARGE RATE (L/S)	ATTENUATION VOLUME FOR 1 IN 100 YR + 40% CC(m ³)
Total site	4.75	53.4	2665 – 3933

4.4 Surface Water strategy

- 4.4.1 The proposed scheme will follow the hierarchy set out in the local policies. As the site is not suitable for infiltration methods, the overall surface water strategy is to attenuate the flows with a discharge to the existing stream that runs through the site.
- 4.4.2 The proposed surface water will utilise suitable SuDS features including, permeable paving (Type C as per CIRIA C753), rills, swales and attenuation basins prior to discharge to the stream.
- 4.4.3 All drainage will be designed in accordance with Part H of the Building Regulations and where offered for adoption to Southern Water will comply with the latest version of the technical guidance in the Code for Adoptions.

4.5 Foul Water drainage

- 4.5.1 All foul water drainage will be designed in accordance with Part H of the Building Regulation and any runs to be offered for adoption to Southern Water will be designed to the latest technical guidance in the Code for Adoption - wastewater.
- 4.5.2 The nearest accessible foul sewer is in Balcombe Road with an invert level of 74.08mAOD. As such a pumping station is likely to be required to pump the generated foul sewerage from the development back up the hill to the sewer in Balcombe Road.
- 4.5.3 The proposed pump station will be offered for adoption to Southern Water to ensure long term maintenance is undertaken.
- 4.5.4 The increase in foul flow to the public foul sewer will need to be checked through a pre-development enquiry application. Should the scheme gain planning approval it will be the

responsibility of Southern Water to ensure the existing public foul network has the capacity to serve the development.

4.6 Drainage Impact

- 4.6.1 As described above in the surface water strategy, there will be not be an increase of flow to the surrounding area from the Proposed Development as the proposal will mimic the existing site and take into account future climate change.
- 4.6.2 Through utilising SuDS features this will mitigate the potential effects of the developments water quality impact and provide opportunities for increasing biodiversity and amenity.
- 4.6.3 By following the above described foul water strategy and working in collaboration with Southern Water it can be seen that the Proposed Development will not impact the surrounding area.

5.0 Summary

- 5.1.1 The Site lies mostly within Flood Zone 1 with a small area of the Site around the stream designated as Flood Zones 2 and 3.
- 5.1.2 The masterplan (Appendix C) has been designed to ensure that all built development is located within Flood Zone 1.
- 5.1.3 There are currently no formal drainage networks on the Site or public sewers crossing the Site. The Site is not suitable for infiltration methods and surface water will be attenuated and discharged to the stream. The Proposed Development will meet the greenfield discharge rate of 53.4 litres per second.
- 5.1.4 The Proposed Development will employ SuDSs features in line with local policy. A pumping station will be required for foul water to meet the foul sewer at Balcombe Road.
- 5.1.5 With this strategy in place and working with Southern Water the Proposed Development is not anticipated to adversely impact the local area.

Appendix A – Greenfield run off calculations

Rural Runoff Calculator

Micro Drainage

ICP SUDS

ICP SUDS Input (FSR Method)

Return Period (Years)

Area (ha)

SAAR (mm)

Soil

Growth Curve

Partly Urbanised Catchment (QBAR)

Urban

Region

Results

QBAR rural (l/s)

QBAR urban (l/s)

Return Period Flood

Region	QBAR (l/s)	Q (100yrs) (l/s)	Q (1 yrs) (l/s)	Q (30 yrs) (l/s)	Q (100 yrs) (l/s)
Region 1	53.4	132.5	45.4	100.9	132.5
Region 2	53.4	140.5	46.5	101.3	140.5
Region 3	53.4	111.1	45.9	93.9	111.1
Region 4	53.4	137.3	44.3	104.7	137.3
Region 5	53.4	190.2	46.5	128.3	190.2
Region 6/Region 7	53.4	170.4	45.4	121.1	170.4
Region 8	53.4	129.3	41.7	101.8	129.3
Region 9	53.4	116.4	47.0	94.2	116.4
Region 10	53.4	111.1	46.5	90.6	111.1

OK Cancel Help

Enter Return Period between 1 and 1000

Appendix B – Microdrainage storage calculations

1 in 100 year + 40% climate change allowance

The 'Quick Storage Estimate' dialog box is shown with the 'Variables' tab selected. The left sidebar contains a 'Micro Drainage' logo and a list of tabs: Variables, Results, Design, Overview 2D, Overview 3D, and Vt. The main area is divided into two columns. The left column contains: 'FSR Rainfall' (dropdown), 'Return Period (years)' (input: 100), 'Region' (dropdown: England and Wales), a 'Map' button, 'M5-60 (mm)' (input: 20.000), and 'Ratio R' (input: 0.328). The right column contains: 'Cv (Summer)' (input: 0.750), 'Cv (Winter)' (input: 0.840), 'Impemeable Area (ha)' (input: 4.750), 'Maximum Allowable Discharge (l/s)' (input: 53.0), 'Infiltration Coefficient (m/hr)' (input: 0.00000), 'Safety Factor' (input: 2.0), and 'Climate Change (%)' (input: 40). At the bottom right of the main area are buttons for 'Analyse', 'OK', 'Cancel', and 'Help'. A footer bar at the bottom of the dialog states 'Enter Climate Change between -100 and 600'.

Variable	Value
FSR Rainfall	[Dropdown]
Return Period (years)	100
Region	England and Wales
M5-60 (mm)	20.000
Ratio R	0.328
Cv (Summer)	0.750
Cv (Winter)	0.840
Impemeable Area (ha)	4.750
Maximum Allowable Discharge (l/s)	53.0
Infiltration Coefficient (m/hr)	0.00000
Safety Factor	2.0
Climate Change (%)	40

The 'Quick Storage Estimate' dialog box is shown with the 'Results' tab selected. The left sidebar is the same as the previous screenshot. The main area displays the following text: 'Global Variables require approximate storage of between 2665 m³ and 3933 m³. These values are estimates only and should not be used for design purposes.' At the bottom right of the main area are buttons for 'Analyse', 'OK', 'Cancel', and 'Help'. A footer bar at the bottom of the dialog states 'Enter Climate Change between -100 and 600'.

Global Variables require approximate storage of between 2665 m³ and 3933 m³.
These values are estimates only and should not be used for design purposes.

Appendix C Proposed Development Masterplan



LAND AT SUGSWORTH, WEST SUSSEX

LANDSCAPE AND VISUAL APPRAISAL
AUGUST 2020

ISSUE SHEET

JOB NAME: LAND AT SUGWORTH, HAYWARDS HEATH
JOB NUMBER: D2935
CLIENT: FAIRFAX ACQUISITIONS

REVISION	DATE	REVISION DETAILS	PREPARED BY	CHECKED BY	APPROVED BY
DRAFT	10.08.20	FOR DESIGN TEAM INFORMATION	CAM	LS	
01	25.08.20	FOR SUBMISSION	CAM	LS	LS

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2.1	landscape designations & policy	6
2.2	landscape character assessment	6
3.0	site analysis	8
3.1	site landscape character	8
3.2	internal visual survey	8
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REPRODUCED FROM ORDNANCE SURVEY DIGITAL MAP DATA © CROWN COPYRIGHT 2015. ALL RIGHTS RESERVED. LICENCE NUMBER 100022432

FIGURE 1.0 – EXTRACT FROM ORDNANCE SURVEY PLAN SHOWING THE LOCATION OF THE SITE (FABRIK, 2020)

1.0

INTRODUCTION

fabrik Chartered Landscape Architects have been appointed by Fairfax Acquisitions Ltd to prepare this Landscape and Visual Appraisal document as part of the promotion of Land at Sugworth, Sussex, (the 'Site'), as an allocated site for housing.

The document demonstrates the landscape and visual reasons as to why the Site (outlined red on the plan opposite) should be considered for development. The Site lies on the northern edge of Haywards Heath, as shown on Figure 1.1 opposite.

This document describes the landscape related policy background to the Site, including the emerging policy proposals; appraises the internal Site arrangements, together with the immediate contextual landscape to the northern side of Haywards Heath, to explain the Site's physical and visual relationship with the town.

The document sets out landscape development parameters, which have informed the indicative masterplan as prepared by Paul Hewitt Architects.

2.0 LANDSCAPE PLANNING AND CHARACTER CONTEXT

2.1 LANDSCAPE DESIGNATIONS & POLICY

The Site lies within the District of Mid Sussex, on the northern edge of Haywards Heath. The boundary of the High Weald Area of Outstanding Natural Beauty, together with the Bore Hill Registered Park and Garden both lie to the immediate west of the Site. To the southwest of the Site, the approved and emerging Penlands Farm residential development is located in an elevated position and is currently under construction. The northern edge of Penlands Farm, abuts the AONB and Registered Park and Garden.

MID SUSSEX DISTRICT PLAN 2014 - 2031 (ADOPTED MARCH 2018)

The Plan sets out a vision for how Mid Sussex want to evolve and a delivery strategy for how that will be achieved. It supports the National Planning Policy Framework's 'presumption in favour of sustainable development'. As such, it sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies.

Policies pertinent to landscape and visual matters are listed below:

- DP12: Protection and Enhancement of Countryside;
- DP22: Rights of Way and other Recreational Routes;
- DP26: Character and Design;
- DP34: Listed Buildings and Other Heritage Assets;
- DP36: Historic Parks and Gardens; and
- DP37: Trees, Woodland and Hedgerows.

Policy DP36: Historic Parks and Gardens, states:

"The character, appearance and setting of a registered park, or park or garden of special local historic interest will be protected. This will be achieved by ensuring that any development within or adjacent to a registered park, or park or garden of local historic interest will only be permitted where it protects and enhances its special features, setting and views into and out of the park or garden."

HIGH WEALD AONB MANAGEMENT PLAN

The High Weald is described as:

"An outstandingly beautiful landscape cherished by people and celebrated for its scenery, tranquillity and wildlife. Its ridges and valleys are clothed with an intricate mosaic of small fields interspersed with farmsteads and surrounded by hedges and abundant woods, all arranged around a network of historic routeways. One of the best surviving Medieval landscapes in North West Europe, the High Weald has remained a unique and recognisable area for at least the last 700 years. Covering 1500 km2 and close to London, this extensive area offers millions of people opportunity to experience

the beauty of nature within a working countryside. It was designated an Area of Outstanding Natural Beauty (AONB) in 1993."

The Management Plan coordinates policy and action, in order to:

"Achieve the legal purpose of 'conserving and enhancing natural beauty' for the benefit of current and future generations."

The plan describes the High Weald's five defining components of character as:

- 1 "Geology, landform and water systems;
- 2 Settlement;
- 3 Routeways;
- 4 Woodland;
- 5 Field and Heath."

The Management Plan defines 'Setting' as: *"The surroundings in which the AONB is experienced by people"* and states:

"The term 'setting' is used to refer to areas outside the AONB where development and other activities may affect land within an AONB. Its extent will vary depending upon the issues considered but some can be mapped, for example, the impact of development on views into and out of the AONB. Section 85 of the CROW Act 2000 requires public bodies to consider whether any activities outside the AONB may affect land in an AONB, and Planning Practice Guidance (Natural Environment: 003) emphasises that this duty is relevant in considering development proposals that are situated outside the AONB boundary."

2.2 LANDSCAPE CHARACTER ASSESSMENT

At the County Level, the Site lies within the Landscape Character Area HW4 High Weald Fringes, as identified within the West Sussex Landscape Character Assessment (2003).

At the District level, the Site lies within the Landscape Character Area 10 High Weald Fringes, as identified within the Mid Sussex Landscape Character Assessment (2005).

The key characteristics for both the County and District Areas, pertinent to the Site and its immediate contexts are:

- *"Wooded, often confined rural landscape of intimacy and complexity partly within the High Weald Area of Outstanding Natural Beauty (AONB).*
- *South and east-draining gills and broad ridges sweeping gently down to the Low Weald.*
- *Significant woodland cover: a substantial portion of it ancient, and a dense network of shaws, hedgerows and hedgerow trees.*
- *Pattern of small, irregular-shaped assart fields and larger fields...*
- *Biodiversity concentrated in the valleys, heathland, and woodland.*

- *Network of lanes, droveways, tracks and footpaths*
- *Dispersed historic settlement pattern, close to Horsham, the principal settlements Cuckfield, Haywards Heath and Lindfield and a few villages and hamlets.*
- *Some busy lanes and roads including A and B roads bounding the area to the west, and other roads crossing north to south, including the A23 Trunk Road.*
- *London to Brighton Railway Line crosses the area at Haywards Heath.*
- *Designed landscapes and exotic treescapes associated with large country houses."*

Landscape and visual sensitivities (which are pertinent to the Site) are described as:

- *"Woodland cover limits the visual sensitivity of the landscape and confers a sense of intimacy, seclusion and tranquillity.*
- *Unobtrusive settlement pattern in many parts.*
- *Older, small assart pastures contribute to the intimacy of the landscape.*
- *Important pockets of rich biodiversity are vulnerable to loss and change.*
- *Network of lanes, droveways, tracks and footpaths provides a rich terrain for horse-riding, cycling and walking and for the appreciation of nature.*
- *Settlement pattern currently sits well within the rural landscape although there is a danger of the cumulative visual impact of buildings and other structures, particularly on the south side of Haywards Heath.*
- *Legacy of designed landscapes and treescapes."*

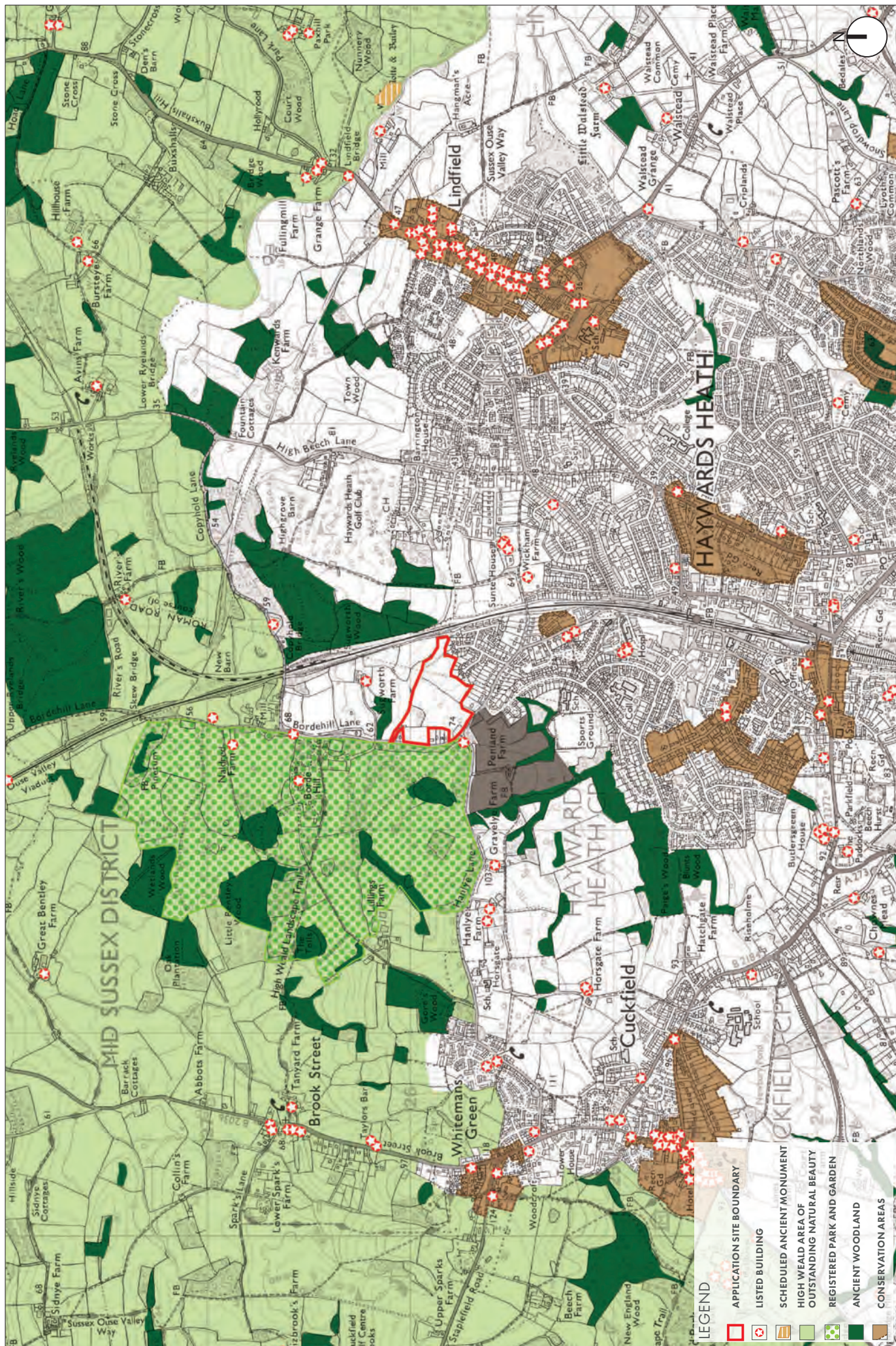


FIGURE 2.0 – LANDSCAPE DESIGNATIONS PLAN (FABRIK, 2020)

3.0 SITE ANALYSIS

3.1 SITE LANDSCAPE CHARACTER

The Site lies within the district of Mid Sussex, on the northern edge of Haywards Heath and is not publicly accessible. The Site is bound by the existing suburban townscape to the southeast and south, with the emerging residential development at Penlands Farm evident to the southwest. The Site is further bound by residential dwellings along its western edge, accessed from Bordenhill Lane. Borden Hill Grade II Listed country house and Registered Park and Garden is situated beyond Bordenhill Lane to the west.

The boundary of the Registered Park and Garden with Bordenhill Lane additionally forms the edge of the High Weald Area of Outstanding Natural Beauty.

The Site's landscape character is informed by the following features:

- arable pasture land use;
- mature woodland within the northwest of the Site;
- mature trees along field boundaries and the water course;
- woodland and trees within the immediate local landscape;
- the mature hedgerow which divides the field parcels;
- sloping landform which falls northeastwards from approximately 75m AOD in the southern corner of the Site to approximately 50m AOD in the northeastern corner;
- the contextual adjacent undulating landform;
- adjacent built form at Bordenhill Lane to the west, Orchard Way and Fairfield Way to the southeast and the emerging development at Penland Farm to the southwest, which is prominent on the skyline due to its elevated position;
- adjacent built form at Sugworth Farm to the north.

The Site lies on the settlement edge and comprises of farmland, woodland and farmsteads. The farming features of the Site are typical and the landscape features are characteristic of the local setting. From the western section of the Site, there is a sense of separation and isolation, although there is little sense of remoteness, given that the adjacent residential dwellings are apparent in views to the north, south and east.

The Site's western boundary lies adjacent to the edge of the High Weald Area of Outstanding Natural Beauty. The edge of the AONB in this location comprises of a woodland belt associated with the parkland of Borden Hill. The mature woodland is a prominent feature and connects with adjacent trees and vegetation, which contribute towards the local landscape character.

Within this locality, residential properties are apparent along Borden Hill Lane. These dwellings are typically two storey, detached and semi detached and are 'relatively rural' in character.

Furthermore, the field parcel within the west of the Site, situated between the neighbouring residential dwellings, is part of the landscape setting to the adjacent woodland which forms the edge of the AONB and Borden Hill Registered Park and

Garden. The pastoral field parcel, with its sloping landform and arable character, forms part of the landscape setting to the AONB plus Registered Park and Garden.

Refer to Figure 1 - Site Analysis Plan.

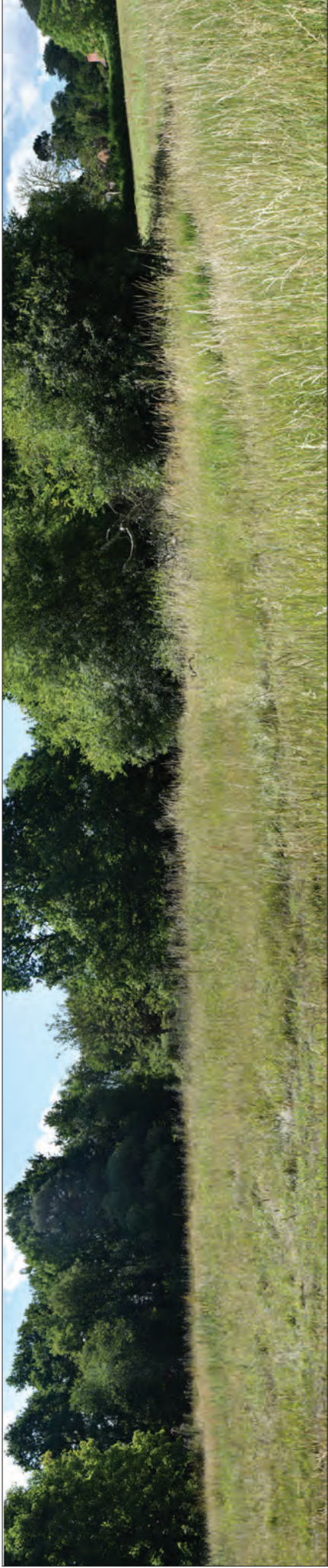
3.2 INTERNAL VISUAL SURVEY

A visual inspection of the Site was conducted on 10th July 2020. The photos on the following page illustrate the existing site conditions and characteristics.

Views towards the AONB and Registered Park and Garden treed boundary from Site are limited in location, most apparent from within the northwestern field parcel and from the wider Site, the treed boundary forms the skyline feature.



FIGURE 3.0 – SITE ANALYSIS PLAN (FABRIK, 2020)



PHOTOGRAPH – VIEWPOINT S1



TREED BOUNDARY
OF THE AONB AND
REGISTERED PARKS
AND GARDEN

DWELLING AT
BORDE HILL
LANE

PHOTOGRAPH – VIEWPOINT S2



PHOTOGRAPH – VIEWPOINT S3



PHOTOGRAPH – VIEWPOINT 54



PHOTOGRAPH – VIEWPOINT 55



PHOTOGRAPH – VIEWPOINT 56

VISUAL ANALYSIS

Seasonal change in existing evergreen and deciduous plant material will affect the available views. Typically views will be different through the seasons with a greater sense of enclosure in the summer months when deciduous trees are in leaf.

The plan overleaf shows the visual summary of the existing Site from the local environs. The selection of views is based on a range of representative views, and considering elevated views to present the worst case scenario.

Views of the Site are experienced by receptors in the immediate local environs, where the Site is visible in the context of the existing vegetation and topography. Beyond this, due to the combination of topography and vegetation, the Site is not readily discernible or apparent.

Open views of part of the Site plus partial views of part of the Site filtered between intervening trees occur from the road corridor of Borehill Lane and Balcombe Road and its associated residential dwellings, to the immediate west and southwest of the Site.

Furthermore, there are open and partial views of the Site from the residential dwellings at Orchard Way and Fairfield Way which are situated adjacent to the Site's southeastern boundary. The character and amenity of these views are informed by the tree planting along the Site's boundary adjacent to the rear gardens. This allows for filtered views through to the arable field within the north of the Site and across to the trees and arable fields beyond the Site to the north. The treed skyline in views from this location is partly formed by the tree belt which forms the edge of the High Weald AONB.

Trees and vegetation filter views of the Site from the northeastern extent of the emerging residential development at Penland Farm. From here, the character and amenity of the view is informed by the sloping landform of the Penland Farm development and the Site, some intervening vegetation and the emerging built form and associated highways works at Balcombe Road.

Within the wider landscape, views of the Site are obscured due to the intervening woodland, trees and topography. As such, there is no inter visibility between the Site and the adjacent High Weald AONB and Registered Park and Garden at Bore Hill to the west, in the summer months.

LEGEND






-  APPLICATION SITE BOUNDARY
-  LOCATION OF PHOTOGRAPHIC VIEWPOINT – OPEN VIEW (AN OPEN VIEW OF THE WHOLE OF THE SITE OR OPEN VIEW OF PART OF THE SITE).
-  LOCATION OF PHOTOGRAPHIC VIEWPOINT – PARTIAL VIEW (A VIEW OF THE SITE WHICH FORMS A SMALL PART OF THE WIDER PANORAMA, OR WHERE VIEWS ARE FILTERED BETWEEN INTERVENING BUILT FORM OR VEGETATION).
-  LOCATION OF PHOTOGRAPHIC VIEWPOINT – TRUNCATED VIEW (VIEWS OF THE SITE ARE OBSCURED BY THE INTERVENING BUILT FORM AND / OR VEGETATION, OR IS DIFFICULT TO PERCEIVE).
-  EXISTING WOODLAND AND TREES



FIGURE 4.0 – LOCATION PLAN SHOWING VISUAL SUMMARY FROM LOCAL AREA (FABRIK, 2020)



VIEWPOINT 1 - LOOKING SOUTHWEST TOWARDS THE SITE FROM BORDEHILL LANE. THE SITE'S BOUNDARY TREES AND VEGETATION ARE APPARENT ADJACENT TO THE ROAD CORRIDOR.



VIEWPOINT 2 - LOOKING SOUTHEAST TOWARDS THE SITE FROM BORDEHILL LANE. THE SITE'S BOUNDARY VEGETATION IS APPARENT ADJACENT TO THE ROAD CORRIDOR, AS IS THE ROOFLINE OF THE NEIGHBOURING DWELLING.



VIEWPOINT 3 - LOOKING NORTHEAST ACROSS THE WESTERN SECTION OF THE SITE FROM BORDEHILL LANE. THE PASTORAL FIELD PARCEL IS APPARENT IN THE FOREGROUND, WITH THE SEMI-DETACHED DWELLINGS APPARENT BEYOND, ACCESSED FROM BORDEHILL LANE. TREES AND WOODLAND FORM THE SKYLINE TO THE NORTH AND WEST.



VIEWPOINT 4 - LOOKING NORTHWEST TOWARDS THE SITE FROM HANLYE LANE. VIEWS OF THE SITE ARE TRUNCATED FORM THIS LOCATION DUE TO INTERVENING VEGETATION.



VIEWPOINT 5 - LOOKING NORTHEAST TOWARDS THE SITE FROM THE NORTHEASTERN CORNER OF THE PENLAND FARM RESIDENTIAL DEVELOPMENT. THE EMERGING ROUNDABOUT AND ASSOCIATED HIGHWAYS WORKS ARE APPARENT IN THE FOREGROUND AND THERE ARE PARTIAL VIEWS OF THE SITE'S FIELD PARCELS THROUGH GAPS IN BOUNDARY VEGETATION.



VIEWPOINT 6 - LOOKING NORTH TOWARDS THE SITE FROM BALCOMBE ROAD. THE ROADWORKS ASSOCIATED WITH THE NEW ROUNDABOUT FOR THE PENLAND FARM DEVELOPMENT ARE APPARENT IN THE FOREGROUND. THE SITE'S BOUNDARY TREES ARE VISIBLE ALONG THE ROAD CORRIDOR. WIDER VIEWS OF THE SITE ARE TRUNCATED.



VIEWPOINT 7 - LOOKING NORTHWEST ACROSS THE SITE FROM THE GARDEN BOUNDARY OF THE DWELLINGS AT FAIRFIELD WAY. OPEN VIEWS ACROSS THE SITE ARE EXPERIENCED FROM THE REAR OF THE PROPERTIES AT FAIRFIELD WAY WHICH BACK ON TO THE SITE.



VIEWPOINT 8 - LOOKING NORTHWEST TOWARDS THE SITE FROM THE PUBLIC RIGHT OF WAY WHICH RUNS ALONG OLD WICKHAM LANE. VIEWS OF THE SITE ARE WHOLLY TRUNCATED DUE TO THE INTERVENING VEGETATION.



VIEWPOINT 9 - LOOKING SOUTH TOWARDS THE SITE FROM COPYHOLD LANE. VIEWS OF THE SITE ARE WHOLLY TRUNCATED FROM THIS LOCATION DUE TO THE INTERVENING VEGETATION AND TOPOGRAPHY.



VIEWPOINT 10 - LOOKING SOUTHEAST TOWARDS THE SITE, FROM THE TOP OF THE HALLA ADJACENT TO THE HIGH WEALD LANDSCAPE TRAIL, AS IT PASSES THROUGH BORDE HILL GARDENS. VIEWS OF THE SITE ARE WHOLLY TRUNCATED DUE TO THE INTERVENING VEGETATION AND TOPOGRAPHY.



VIEWPOINT 11 - LOOKING SOUTHEAST TOWARDS THE SITE FROM THE BRIDLEWAY WHICH PASSES THROUGH LULLINGS FARM. FROM THIS ELEVATED LOCATION, VIEWS OF THE SITE ARE WHOLLY TRUNCATED DUE TO THE INTERVENING VEGETATION AND TOPOGRAPHY.

5.0 LANDSCAPE PARAMETERS

The landscape development parameters illustrated opposite have been prepared considering the existing landscape designations; the existing settlement edge framework; and the landscape and visual constraints / opportunities associated with the Site.

Existing Conditions:

- The Site lies on the edge of the High Weald AONB and immediately adjacent the Borden Hill Registered Park and Garden, with a sloping landform which connects to an associated valley bottom and undulating landform beyond.
- There is a sense of openness along the western edge of the site perceived from Bordenhill Lane, between the existing dwellings.
- The treed skyline with built form in an elevated position at Penland Farm, Balcombe Road, Orchard Way and Fairfield Way are prominent skyline features in views from the Grade II Listed farmhouse at Sugworth Farm to the north.
- The Site is well contained visually from the west, due to the wooded and treed character of Borden Hill Registered Park and Garden and the AONB, with localised views from the immediate landscape to the northwest, west, south and east.

Landscape and Visual Recommendations to the Development Proposals:

- Proposed development parcels are to be situated adjacent to existing adjacent built form.
- Linear hedgerow features with associated trees to be retained and enhanced, with access between the development parcels to be sensitively located within the lowest slopes of the Site.
- Opportunities to utilise the emerging roundabout, associated with the Penland Farm development. The proposed access solution is to be sensitive to the evolving character of Balcombe Road, create a wooded 'arboreal' approach and be a high quality arrival space to the Site.
- The proposed development parcels are to be responsive to the character of the adjacent ribbon development along Borden Hill Lane.
- Development parcels are to form a positive interface between the new settlement edge and the proposed open space, with built form fronting on to the open space, and responsive to Sugworth Farmhouse to the north.
- Development parcels are to be set away from the AONB and RPG edge to maintain the existing landscape setting.

Open Space and Green Infrastructure:

- Retention of existing hedgerows, trees and woodland.
- Introduction of linear tree belts along the alignment of existing hedgerows, creating open space corridors through the development, connecting with the larger area of public open space existing trees and woodland within the north of the Site and existing trees off-site, creating arboreal wildlife corridors.
- Open space to retain the perceived sense of openness within the north of the Site and to have a 'Country Park' character to complement the adjacent Borden Hill Registered Park and Garden.
- New pedestrian footpaths to connect with existing road and footpath network off site and within the adjacent Penland Farm development and beyond to the wider Public Rights of Way.

Refer to Figure 5 - Landscape Parameter Plan.

Open Space Provision:

The Mid Sussex District Plan (2018) provides guidelines on open space provision. Policy DP24: Leisure and Cultural Facilities and Activities, states:

"...The on-site provision of... play areas and equipment will be required for all new residential developments, where appropriate in scale and impact, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities..."

The supplementary planning document 'Development, Infrastructure and Contributions' (adopted 2018) describes open space and formal sports provision contributions (within Appendix 2).

It states:

"The District Council uses the guidelines set out within the Guidance for Outdoor Sport and Play of the National Playing Fields Association (2015) as the benchmark standards when assessing playing space requirements for new residential development. These should not be interpreted as a maximum standard and there may be circumstances where provision in excess of these standards will be required..."

The overall guideline is for 1.2ha of playing pitches; 1.6ha for 'all outdoor sports'; 0.25ha for equipped designated play areas and 0.30ha for other outdoor provision per 1,000 population."

The Site's open space requirements:

- Calculations based on 130 units and 2.4 people per dwelling
- Anticipated population of 312
- $1.2 + 1.6 + 0.25 + 0.3$ ha per 1000 population as per Council's recommendations
- Equates to a requirement for 1.045ha of sport and play space on Site, which includes:
 - 0.374ha playing pitches
 - 0.5ha all outdoor sports
 - 0.078ha equipped play
 - 0.094ha other outdoor provision (unequipped play)

Current open space provision:

- The proposed development parcels = 4.62ha approx.
- The proposed open space = 4.42ha approx.

In terms of the requirement for formal sports to be delivered as part of the proposed development, due to the combination of settlement edge location, topography and landscape character, an alternative solution to sports provision is recommended, and a more naturalistic approach should be taken with the play spaces - incorporating them into the open space, at strategic locations and are to provide a range of experiences for children.

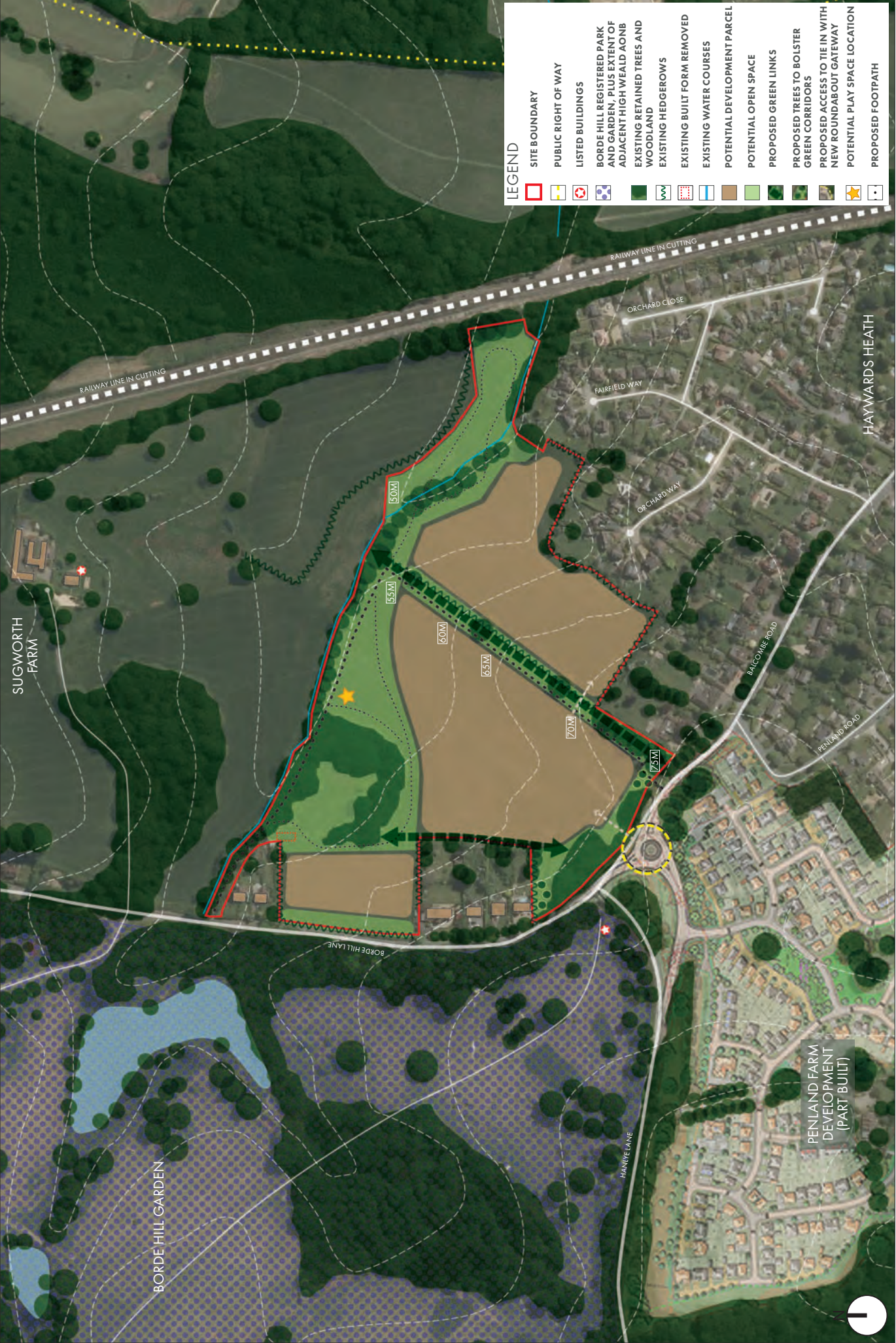


FIGURE 5.0 – LANDSCAPE PARAMETER PLAN, COORDINATED WITH THE INDICATIVE MASTERPLAN (FABRIK, 2020)

SETTING TO THE AONB AND REGISTERED PARK & GARDEN

The scheme is sensitive to the setting of the AONB and Registered Park and Garden, in that:

- Proposed development parcels are sensitively located away from the Grade II Listed 'South Lodge' at Borde Hill to the west.
- The bolstering of the linear tree belt along the Site's southern boundary will reinforce the treed character of Balcombe Road and the edge of the AONB and Registered Park and Garden. Additional tree planting will provide connectivity to the green corridors through the Site and beyond to the wider landscape.
- Proposals will result in the creation of a large portion of the Site as publicly accessible open space, which will maintain the existing green interface with the new settlement edge and the adjacent rural landscape.
- Proposals will provide for the preservation of the Site's key landscape components and the introduction of additional features which are pertinent to the characteristic features identified within the AONB Management Plan:
 - routeways;
 - wildflower grass verges;
 - veteran trees and ancient coppice;
 - inter-connected mosaic of small woods, linear gill woodlands, shaws, wooded routeways and outgrown hedges;
 - trees used for boundary markers (including outgrown laid hedges, stubs and pollards);
 - traditional orchards.
- As recommended within the AONB Management Plan, proposals will provide opportunities for informal outdoor recreation and experiencing the beauty of nature of beauty. The proposed additional footpaths have the potential to connect with the AONB and provide access to the open space on Site which includes features such as the woodland and stream.
- The development parcels are to be situated adjacent to the existing urban edge of Haywards Heath where the existing interface between settlement and open space is comprised of rear gardens with associated intermittent fencing and vegetation.
- The development parcels within the east of the Site are framed by existing built form and mature vegetation, which can be further bolstered to reinforce habitat connectivity and a verdant skyline. This is a characteristic feature of the settlement edge of Haywards Heath.
- The development parcel within the northwest of the Site is to be responsive to the character of the adjacent ribbon development at Bordehill Lane, with dwellings set back from the Lane and designed to be comparable in form and scale to the adjacent houses.
- The landscape setting to the AONB and RPG at Borde Hill Lane is informed by linear ribbon development interspersed with green space. Therefore, the continuation of built form along this edge would not significantly alter the perceived setting in this location.
- Proposed access to the potential development is to utilise the emerging roundabout, associated with the Penland Farm development. This highways feature, once complete will provide a key gateway to Haywards Heath, from the north.

7.0 INDICATIVE MASTERPLAN



SUMMARY AND CONCLUSIONS

An initial landscape and visual appraisal of the Site reveals that the Site is well related to the residential northern edge of Haywards Heath. It is enclosed to the north, west and east by undulating topography, woodland and trees. Furthermore, the Site boundaries are defined predominantly by vegetation that follow the alignment of the road network associated with Borehill Lane (to the northwest and west) and Balcombe Road to the south. This combination of features provide a mature landscape with a clearly defined northern edge to the north of Haywards Heath.

The Site is apparent from Borehill Lane, in between existing dwellings, but is not readily discernible from public vantage points within the High Weald AONB and Registered Park and Garden at Bore Hill, nor is it discernible in the wider landscape due to intervening topography and vegetation. Therefore, development of the Site would not significantly alter the setting of the AONB or Registered Park and Garden.

The indicative masterplan illustrated at Figure 6.0 has been informed by the advice set out within this appraisal, with the location and layout of development parameters generated by the visual and landscape character assessment.

Overall, in landscape and visual terms, it is our conclusion, that there are no significant overriding landscape constraints to the delivery of this Site for development.



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HAMPSHIRE
GU34 1HG

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7TH FLOOR
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Technical Note

Project No: ITL14572
Project Title: Land at Borde Hill Lane, Sugworth
Title: Highways and Access Sustainability
Ref: ITL14572-003c TN
Date: 7 September 2020

SECTION 1 INTRODUCTION

1.1 Overview

- 1.1.1 Fairfax has appointed i-Transport LLP to provide highways and transport advice in respect of Land at Borde Hill Lane, Sugworth. A residential development of circa 130 dwellings is envisaged.
- 1.1.2 The site is located in Sugwoth, West Sussex, to the north of Haywards Heath (Haywards Heath railway station is situated circa 1.5km to the south east of the site). The site is bordered by rural fields to the north and east, residential properties to the south and Balcombe Road / Borde Hill Lane to the west.
- 1.1.3 The site has not been identified as one of 22 housing sites identified within the Mid-Sussex Draft Site Allocations DPD (Regulation 19) document. Accordingly, this technical note has been prepared to demonstrate that the site is suitable for a residential development and sets out the sustainability credentials of this site as well as the deliverability of a suitable access for all users.

SECTION 2 ACCESSIBILITY

2.1 Overview

- 2.1.1 A pertinent aim of national and local policy is the delivery of sustainable development, part of which is the accessibility of a site to a good range of transport modes and the good accessibility to a range of everyday services and facilities. Walking and cycling provide important alternatives to the private car and should be encouraged to form part of longer journeys via public transport.

2.2 Local Services and Facilities

- 2.2.1 Manual for Streets states that 'walkable neighbourhoods' are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas, but this is not an upper limit (Ref: Manual for Streets paragraph 4.4.1). Indeed, the CIHT Planning for Walking guidance document (April 2015) acknowledges that circa 80% of journeys up to 1mile (1,600m) are made wholly on foot. Furthermore, the average distance of pedestrian journeys is 0.85mi (1,360m) (Ref: Planning for Walking, Section 2).
- 2.2.2 The results of the National Travel Survey 2019, published August 2020, corroborates these findings and identify that walking is the most frequent mode used for short trips – 80% of trips under one mile (c. 1,600m) and almost one-third (31%) of trips between one and two miles (c. 3,200m) were on foot (Ref: NTS Table 0308).
- 2.2.3 A summary of local facilities and services, the distance of these from the site, and approximate walking and cycling journey times, is provided in Table 2.1, and shown diagrammatically on Figure 1. The colour coding highlights the locations within 1,600m (within which distance 80% of trips are completed on foot) and 3,200m walking distance where circa one-third of journeys are completed on foot and therefore walking is a realistic alternative to car use.

Purpose	Destination	Approx. distance (metres)	Walking journey time (mins)	Cycling journey time (mins)
Retail	Sainsbury's Superstore	1,300	15	5
	Waitrose	1,400	17	6
	Budgens Convenience store and Post office	1,500	18	6
	Marks & Spencer's	2,500	30	10
	Haywards Heath Retail Centre	2,600	31	11
Education	Harlands Primary School	750	9	3
	Elan Pre-School	1,500	18	6
	Robins Nest Day Nursery	1,800	21	7
	Oathall Community College	2,300	27	9
	St. Joseph's Catholic Primary School	2,600	31	11
Leisure	The Dolphin Leisure Centre	1,400	17	6
	Haywards Heath Cricket Club	1,700	20	7
	Haywards Heath Library	1,900	23	8
Health	Nuffield Health Haywards Heath Hospital	1,100	13	4
	Lloyds Pharmacy	1,300	15	5
	The Clinic Dental Facial	1,700	20	7
	Newton Surgery	2,100	25	9
Employment	Mid Sussex District Council	2,000	24	8
	Bridge Road Industrial Estate	2,000	24	8
	Perrymount Road Offices	2,100	25	9

Source: Consultant

2.2.4 On the basis of the above, a number of facilities for a range of journey purposes are located within distances where walking is a genuine choice of mode.

2.2.5 Of note, relating to the development of 210 homes at Penland Farm (directly opposite the site) that is currently under construction, it is worth noting that in granting permission at appeal in 2014 (appeal ref: 2218078) the Inspector noted at paragraph 70;

“The Council and the appellants agree that the site is in an accessible location and I share that view. It is reasonably convenient for shops, services, schools and other community facilities and there would be opportunities for walking and cycling.”

2.2.6 Given that Land at Borde Hill Lane is adjacent to the appeal site it would equally be an “accessible location” with “opportunities for walking and cycling”. Further, since 2014 the accessibility credentials of this location has improved with a new Waitrose superstore (opened in 2017 as part of a regeneration scheme known as Station Quarter) and a 2019 refurbishment of Dolphin Leisure Centre providing additional services and facilities.

2.3 Pedestrian and Cycle Connectivity

2.3.1 Given the location of key services and facilities south of the site, key routes for pedestrian and cycle trips will be via Balcombe Road and Penland Road. Balcombe Road provides a footway of circa 2m throughout on at least one side of the carriageway to/from Haywards Heath station. Penland Road provides footways on both sides of the carriageway. Both routes are street lit with dropped kerbs/tactile paving located at junctions between the site and Haywards Heath station/town centre. Together, these provide a comprehensive pedestrian network to support pedestrian connectivity to the south of the site and the wider area. It is noted that footways to the south are being upgraded and extended as part of the Redrow scheme to facilitate journeys of foot to/from Haywards Heath Town Centre.

2.3.2 No dedicated cycle routes are available within the vicinity of the site. However, a leaflet prepared by Mid-Sussex District Council and Haywards Heath Town Council identifies a circular route (titled Harlands) that directs cyclists both via Penland Road and Balcombe Road identifying the route is suitable for some cyclists.

2.4 Public Transport Accessibility

Bus

2.4.1 The site is located circa 350m from a southbound bus stop on Penland Road (near junction with The Spinney). Traveline SouthEast identifies route 31a/31c operates a loop service every two hours between Uckfield and Haywards Heath, before returning to Uckfield.

2.4.2 Additional bus services as well as rail services are available at Haywards Heath station/Perrymount Road bus stops, 1.5km from the site. From this location, buses 3, 30, 31/31a/31c, 33/33A, 39, 62, 89, 166, 270 and 272 are accessible. These additional services, the destinations served and frequencies are summarised in Table 2.2. overleaf.

Table 2.2: Haywards Heath Bus Services

Service	Destination	Typical Frequency		
		Mon-Fri	Saturday	Sunday
30	Haywards Heath – Lindfield Circular	Up to 2 buses per hour	No Service	No service
39	Haywards Heath – Bolnore Village – Haywards Heath	1 per hour	1 per hour	No Service
62	Crawley – Cuckfield – Haywards Heath – Franklands	1 per 2 hours	No Service	No Service
270	Brighton – Burgess Hill – Haywards Heath – East Grinstead	1 per hour	1 per hour	No Service
271	Brighton – Burgess Hill – Haywards Heath – Crawley	1 per 2 hours	1 per 2 hours	1 per 2 hours
272	Brighton – Burgess Hill – Haywards Heath – Crawley	1 per 2 hours	1 per 2 hours	No Service
31	Lindfield – Haywards Heath – Uckfield	1 per hour	1 per hour	No service
33	Hurstpierpoint – Burgess Hill – Haywards Heath	1 per hour	1 per hour	No service
89	Horsham – Haywards Heath	4 per day	4 per day	No service
166	Lewes – Offham – Plumpton – Haywards Heath	1 per two hours	No service	No service

Source: Traveline

2.4.3 The permission at Penland Farm will also fund the introduction of an hourly bus service between that site and Haywards Heath station and Princess Royal hospital for a period of at least five years once 51 occupations are reached. This will be of benefit to future occupiers of the Land at Borde Hill Lane site and provide an additional sustainable transport mode connecting with a number of key local services and facilities (including the local hospital).

Rail

2.4.4 Facilities available at Haywards Heath railway station (also 1.5km from the site) include ATM machines, payphones, public wi-fi, post box, accessible toilets, baby changing facilities and waiting rooms. Table 2.3 summarises the key destinations accessible from Haywards Heath as well as their service frequency

and shows that there are fast and frequent rail services from Haywards Heath to key local regional and national destinations.

Table 2.3: Haywards Heath Station Rail Services

Destination	Typical Weekday Frequency		Typical Journey Duration
	Peak (0700 – 0800)	Off-Peak	
London Victoria	6 per hour	4 per hour	45 mins
London Bridge	5 per hour	3 per hour	43 mins
Gatwick Airport	10 per hour	7 per hour	13 mins
Bedford	3 per hour	2 per hour	124 minutes
Brighton	2 per hour	5 per hour	20 minutes
Eastbourne	1 per hour	2 per hour	38 minutes
Littlehampton	-	2 per hour	58 minutes

Source: Realtime Trains

- 2.4.5** Being situated on the Brighton Main Line, the station offers excellent services to a range of destinations including Central London, Gatwick Airport and the South Coast.
- 2.4.6** Whilst 1,500m walk from the site and still within the distance where 80% of journeys are made on foot, the CIHT Planning for Walking guidance document notes *“The power of a destination determines how far people will walk to get to it”*, i.e. the services available at the destination (of the walk trip) means potential users will be prepared to walk further to reach it. As shown in Table 2.3, there is considerable rail service availability from Haywards Heath station with circa one train every six minutes routing towards Central London/Gatwick Airport at peak times. It is therefore reasonable to expect future occupiers would walk to/from the site and Haywards Heath station.
- 2.4.7** Furthermore, it is well within a comfortable cycling distance, with the CIHT Planning for Cycling Document (October 2014) noting 40% of cycling trips are up to 3,200m (2mi) in length and 80% are up to 8km (5mi) in length. Cycle parking is also provided at Haywards Heath station with dedicated, secure (covered by CCTV) cycle parking for in excess of 300 cycles.

SECTION 3 ACCESS

3.1 Overview

- 3.1.1 In recognition of the location of existing local facilities and transport connections within Haywards Heath (as noted previously), the primary desire line for pedestrians will be to/from the southern part of the site and therefore it is prudent for pedestrian access to be provided in this location.
- 3.1.2 It is also noted that the permitted Redrow site at Penland Farm (210 dwellings – *application reference: DM/16/1803*) opposite the site frontage is improving the Balcombe Road / Hanlye Lane / Borde Hill Road priority junction to a 3-arm roundabout. The construction of the roundabout is already underway, and it is understood works due to be completed by the end of summer 2020.
- 3.1.3 Therefore, the rational location for access to Land at Borde Hill Lane would be through the introduction of a fourth arm to the roundabout currently under construction. A revised roundabout layout with a fourth arm is shown in Drawing ITL14572-GA-001 attached to this Note. As noted in Section 2, footway provision within the vicinity of the site is primarily on the opposite side of the carriageway to the development site. Accordingly, a crossing point is shown to connect future pedestrians to the footway. The roundabout would be enlarged to provide for the safe movement of all road users and to efficiently accommodate existing traffic flows, those from the Redrow development and those from subsequent development on Land at Borde Hill Lane.
- 3.1.4 The revised roundabout design would provide:
- direct pedestrian access along the primary desire line;
 - safe access for cyclists being located within a 30mph speed limit with street lighting; and
 - vehicular access in a location which has already been accepted by the highway authority.
- 3.1.5 Accordingly, the access arrangements shown on Drawing ITL14572-GA-001 would provide safe and suitable means of access for all and enable the accessibility benefits of the site location to be realised.

SECTION 4 SUMMARY

4.1.1 Fairfax has appointed i-Transport LLP to provide highways and transport advice in respect of Land at Borde Hill Lane, Sugworth. A residential development of circa 130 dwellings is envisaged.

4.1.2 This technical note has been prepared to demonstrate that the site is suitable for a residential development and sets out the sustainability credentials of this site as well as the deliverability of a suitable access for all users.

4.1.3 The local area provides footways of good quality to connect the site to a number of key local facilities and services, the majority of which are within a distance where the majority (80%) of trips are completed on foot. A 2014 appeal decision for a site adjacent to this (Penland Farm, appeal ref: 2218078) noted;

"The Council and the appellants agree that the site is in an accessible location and I share that view. It is reasonably convenient for shops, services, schools and other community facilities and there would be opportunities for walking and cycling."

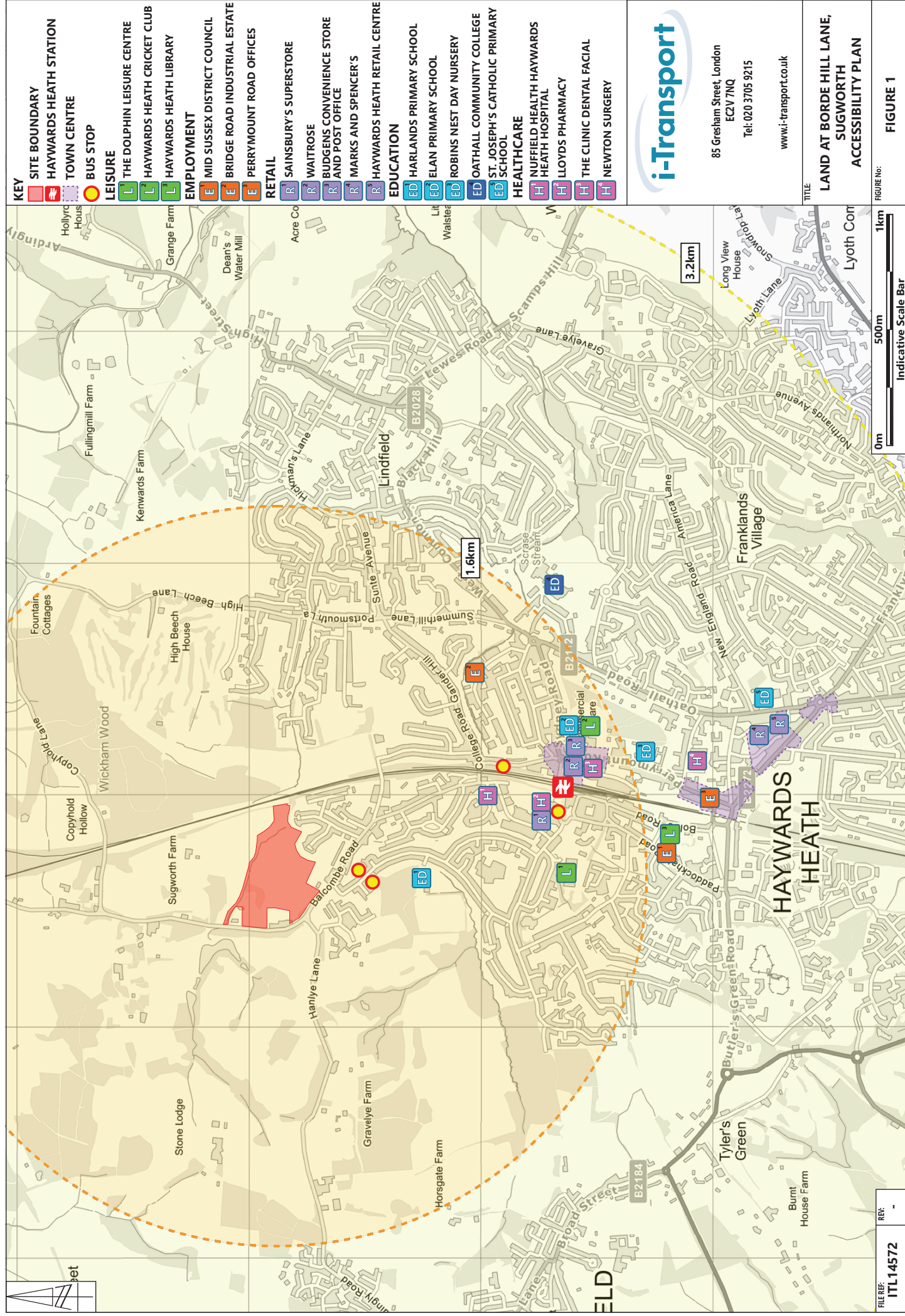
4.1.4 There is no reason why the above would no longer apply. In fact, it can be considered the site has attained enhanced accessibility credentials in the intervening period in that a new Waitrose superstore was opened in 2017 (as part of a regeneration scheme known as Station Quarter) and a 2019 refurbishment of Dolphin Leisure Centre has introduced additional services and facilities.

4.1.5 The site is well located with respect to public transport services. In addition to bus services, the site is circa 1,500m from Haywards Heath railway station. Being situated on the Brighton Main Line, the station offers excellent services to a range of destinations including Central London, Gatwick Airport and the South Coast with circa one train every six minutes routing towards Central London/Gatwick Airport at peak times.

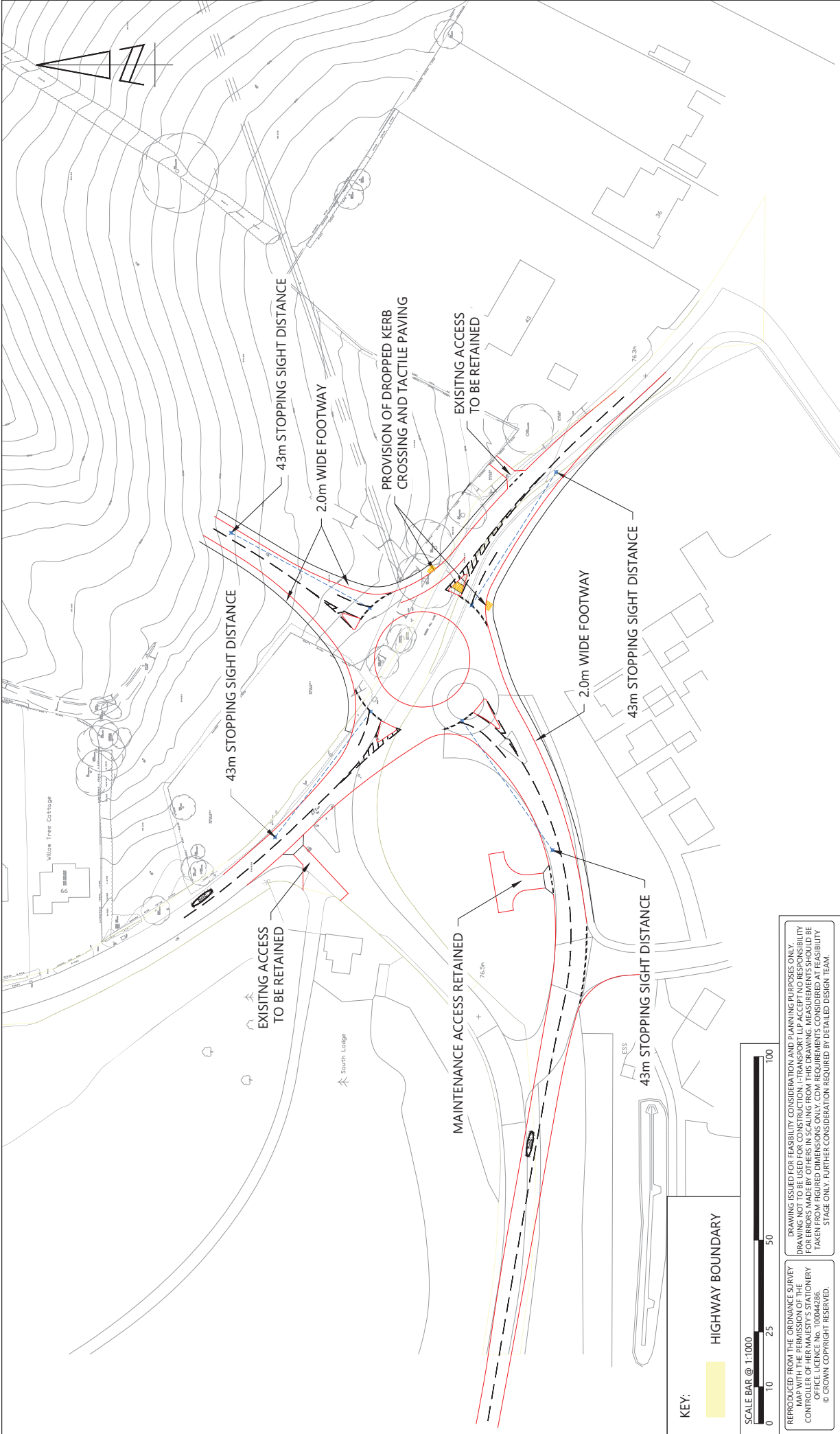
4.1.6 The site location, the accessibility to local facilities within walking and cycling distance, and the accessibility to public transport would result in a development which would provide genuine opportunities to promote sustainable transport.

4.1.7 Access to Land at Borde Hill Lane would be via the introduction of a fourth arm to a roundabout which will provide access to the Penland development opposite. The access arrangements, which are shown on Drawing ITL14572-GA-001, would provide safe and suitable means of access for all and enable the accessibility benefits of the site location to be realised.

FIGURE



DRAWING



KEY: HIGHWAY BOUNDARY



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i-transport				85 Gresham Street, London EC2V 7NQ				Tel: 020 3705 9215				www.i-transport.co.uk			
STATUS				FOR INFORMATION				TITLE				INITIAL SITE ACCESS ARRANGEMENT			
REV		DATE		BY		DESCRIPTION		IN		PH		CLIENT: LAND AT BORDE HILL LANE, SUGWORTH			
B		10.08.20		SH		SITE ACCESS REINFORCED		A		24.07.20		PROJECT: FAIRFAX PROPERTIES			
A		24.07.20		SH		SITE ACCESS REINFORCED		CHK		APD		DRAWING No: ITL14572			
DRAWN:		SH		CHECKED:		DF		APPROVED:		PH		DRAWING No: ITL14572-GA-001			
PROJECT No:		ITL14572		SCALE @ A3:		1:1000		DATE:		03.07.20		REV: B			





Unit 4 Langham Stables, Langham Lane, Lodsworth, West Sussex, GU28 9BU

Te : 01798 861 800, E-Mail : info@ecologyco-op.co.uk

19th August 2020

Ecological Representation: Land at Sugworth, Bordehill Lane, West Sussex RH16 1XN

Dear Sir/Madam,

This letter serves as an ecological representation and summary regarding ecological constraints and opportunities associated with the proposed development of Land at Sugworth, which falls within the administrative district of Mid Sussex.

Information discussed within this letter includes the results of a desk-based study, including the gathering of biological information from Sussex Biodiversity Records Centre (SxBRC), and all site visits to date, conducted by The Ecology Co-op in 2020. This letter accompanies a detailed Ecological Assessment and Phase 1 Habitat survey report¹ of the site.

Site Description & Context

The site is located at Bordehill Lane, Sugworth, West Sussex RH16 1XN. The central grid reference for the site is TQ 3257 2588. The site measures approximately 10.6 hectares and comprises fields, hedgerows, a stream, a pond, two small parcels of woodland and an open-sided farm building. The surrounding landscape is semi-rural and includes mixed farmland, woodland and residential areas.

The proposed development includes the construction of up to 130 residential units, with associated hard and soft landscaping.

Designated Sites and Granted EPS Licences

There are three statutory designated sites within 2km of the land at Sugworth: 1) High Weald Area of Outstanding Natural Beauty, 2) Blunt and Paiges Wood Local Nature Reserve (LNR) and Scrase Valley LNR. The High Weald is designated for its aesthetic value and both LNR's are designated for the important habitats present within each site.

There are three granted EPS licences for mitigation projects within 1 km of the site boundary, as shown on the Magic Maps website. Two concern the destruction of a brown long-eared bat *Plecotus auritus* roost more than 650m away, and one concerns the destruction of a common dormouse *Musccardinus avellanarius* resting place 320m south-west of the site.

¹ The Ecology Co-op, 2020. *Ecological Assessment Land at Sugworth*

Habitats

Habitats identified within the site are listed in Table 1 below, for further description of habitats and their distribution within the site, please refer to the Ecological Assessment and Phase 1 Habitat survey report¹.

The broadleaved woodland, hedgerows, stream and pond habitats present within the site are all considered to qualify as habitats of principal importance (S41 NERC Act 2006) and should be retained.

Table 1. Habitats identified within the Land at Sugworth.

Habitat type	JNCC Code	Area(ha)/ Length(km)	Habitat of Principal Importance (Y/N)	Assessment of Ecological Value ²
Broad leaved wood and	A1.1.1	1.2ha	Y	County
Mixed wood and – semi-natural	A1.3.1	0.23ha	Y	Local
Scrub – scattered	A2.2	0.18ha	N	State
Broad leaved park and/scattered trees	A3.1	0.12km	N	Local
Neutral grass and – semi-improved	B2.2	4.06ha	N	Local
Marshy grass and	B5	0.25ha	N	State
Poor semi-improved grass and	B6	4.22ha	N	State
Standing water – mesotrophic	G1.2	0.09ha	Y	District
Running water – mesotrophic	G2.2	0.67km	Y	District
Intact hedge – species-poor	J2.1.2	0.18km	Y	Local
Defunct hedge – native species-rich	J2.2.1	0.34km	Y	District
Defunct hedge – species-poor	J2.2.2	0.1km	N	State
Dry ditch	J2.4	0.04km	N	Negative
Burdens	J3.6	0.02ha	N	Negative
Bare ground	J4	0.06ha	N	Negative

Species

Table 2 provides a summary of the site's suitability for protected/notable species of wildlife.

Table 2. A summary of protected/notable species relevant to the Land at Sugworth.

Species	Suitable Habitat(s)	Records from Local Area (Y/N)	Notes
Badgers	Wood and, Grass and	N	Mammals runs are consistently present across the site. No setts or latrines have been found to date.
Bats (roosting)	Trees, Burdens	Y	There are several mature trees and dead trees within and bordering the site which have bat roost potential. There is one burden within the site, an open-sided farm burden, with two features on the south elevation of the burden which have low potential to support roosting bats. Further surveys have been recommended for any burdens/trees which would be directly impacted by the development.
Bats (foraging /commuting)	Wood and, Tree belt, Stream, Hedgerows	Y	The site is assessed as having high suitability for foraging and commuting bats. Two activity surveys and three static logger deployments have been completed to date. The following species have been recorded on site: common pipistrelle <i>Pipistrellus pipistrellus</i> , soprano pipistrelle <i>P. pygmaeus</i> , Nathusius pipistrelle <i>P. nathusii</i> , brown long-eared, <i>Myotis</i> spp., serotine <i>Eptesicus serotinus</i> and noctule <i>Nyctalus noctula</i> .

² CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester.

Species	Suitable Habitat(s)	Records from Local Area (Y/N)	Notes
Breeding Birds	Wood and, Grass and, Tree Belts, Hedgerows, Scrub	Y	Three breeding bird surveys were completed between April and June 2020. In total, 18 species of bird were recorded during the surveys, including two red-listed species (song thrush <i>Turdus philomelos</i> and common starling <i>Sturnus vulgaris</i>) and two amber-listed species (dunnock <i>Prunella modularis</i> and kestrel <i>Falco tinnunculus</i>). No ground-nesting birds were recorded.
Dormice	Wood and, Hedgerows, Scrub	Y	The SxBRC provided 28 dormouse records in the search area. The closest of these was at 300m south-west from the boundary of the site, dated 2013. No dormice have been found on site to date.
Great Crested Newt	Wood and, Pond, Scrub	Y	There is one pond within the site, which is dry for the majority of the year, and a further 10 ponds within 500 m of the site boundaries. A ponds within 250 m, that were assessed as suitable for great crested newts <i>Triturus cristatus</i> , were surveyed using eDNA analysis. The results proved negative for great crested newts and this species is therefore considered to be absent from the pond and the wider site.
Reptiles	Grass and, wood and, Scrub,	Y	Suitable habitat for common lizard <i>Zootoca vivipara</i> , grass snake <i>Natrix helvetica</i> , adder <i>Vipera berus</i> and slow worm <i>Anguis fragilis</i> exists on site. Four reptile surveys have been completed to date and these indicate that there is a low population of grass snakes and slow worms on site.
Reptiles and Amphibians	Stream	N	A stream forms the northern boundary of the site. This was assessed as unsuitable for water voles <i>Arvicola amphibius</i> and otters <i>Lutra lutra</i> due to its shallow nature and lack of dense bank vegetation.
Invertebrates	Wood and, Grass and Hedgerows	Y	Suitable habitat for stag beetle <i>Lucanus cervus</i> and other species of principal importance (S41 NERC Act 2006) exists within the site. A variety of common species have been recorded on site to date.
Invasive Non-native Species (INNS)	Wood and edge, Hedgerow	Y	Small amounts of Japanese knotweed <i>Fallopia japonica</i> and Montbretia <i>Crocodymia x crocosmiiflora</i> have been recorded on site.

Constraints/Opportunities

Designated Sites

With the exception of the High Weald Area of Outstanding Natural Beauty, which is designated for the aesthetic landscape and not for conservation features, the remaining designated sites are outside of the zone of influence from construction-based impacts such as noise, light and air pollution.

Post construction, occupancy of the residential development could result in increased recreational pressure on the surrounding designated sites, leading to risks such as trampling of vegetation, soil compaction, littering, fly tipping, damage to trees, disturbance to wildlife and increased nutrient levels from dog fouling.

In order to mitigate the impacts of increased recreational pressure on the designated sites, it is important that public green spaces are incorporated into the proposed scheme to provide attractive alternative areas for recreational purposes. Based on the current proposed designs, there are multiple areas of undeveloped land to the north and south of the residential housing that is afforded for open green space, with public footpaths throughout and a small play space.

Habitats

The development will result in the direct loss of semi-improved grassland and poor semi-improved grassland. A small area of woodland and scrub will also be lost, as well as the slight widening of an

existing gap in the central hedgerow, at the southern end. Although direct impacts on the remaining habitats will be minimal, during the construction phase there is the potential for damage due to digging and maneuvering of heavy machinery, resulting in damage of roots and compaction of root zones.

Post-construction, occupancy of the residential development could result in increased recreational pressure on the natural habitats, including the woodland and marshy grassland, leading to trampling of vegetation, soil compaction, littering, fly tipping, damage to trees, disturbance to wildlife, and increased nutrient levels from dog fouling, as a result of increased site use by residents. The surrounding habitats (fields and woodland) are all privately owned and therefore should not be impacted by increased recreational pressure arising from the development. However, fences and signs may be required to enforce this.

In the absence of mitigation, these combined impacts could potentially lead to severe degradation of the habitats on site, through altering species compositions and a reduction of species diversity and abundance.

A Biodiversity Mitigation/Enhancement Plan will be required to demonstrate areas of high value habitat retained/created within the development and within the surrounding estate, and to establish suitable management regimes to enhance such areas for their biodiversity value. Any loss of priority habitats would require compensation/offsetting on a basis of like-for-like replacement.

A Biodiversity Impact Calculation (using the DEFRA Metric) will be required to demonstrate net gain in biodiversity and demonstrate compliance with the NPPF. With the retention of existing high-value habitat, and the creation of new habitats (e.g. hedgerows, woodland, species-rich grassland) it is considered that a residential development within the site could potentially result in a net-gain in biodiversity.

Badgers

There is potential for badgers *Meles meles* to become trapped/injured/killed during the construction phase without the adoption of precautionary measures. The level of disturbance will increase during the construction phase and the operational phase, due to increased traffic / machinery and more frequent interactions with the occupied residential properties (visiting gardens, interactions with people and pets and exposure to poisons). The potential impact on badgers will need to be considered within the site mitigation strategy and should include measures such as covering excavations when not in use and a speed limit on all roads throughout the site.

Bats

Further surveys will be needed if the building or any trees with bat roost potential are to be impacted by the development.

The proposed development has potential to result in disturbance to commuting and foraging bats, both during construction and in the long term after completion, through increased artificial lighting, disruption of commuting corridors and direct loss of the semi-improved grassland habitat that could be an important source of insect prey for bats. The results of bat activity surveys will inform a bat mitigation strategy which will likely include measures such as: retention of important foraging/commuting habitat, establishment of dark corridors and enhancement for roosting bats.

Breeding Birds

The layout of the development has retained nearly all existing hedgerows, all mature trees and woodland. In addition, an 8m buffer will be present along the stream, central hedgerow and woodland parcels which will prevent accidental damage and reduce disturbance during the construction phase. The site mitigation and enhancement strategy will include the following measures for birds: vegetation clearance will only be undertaken outside of the breeding bird season (1st March to 31st August). Where

this is not possible, a nesting bird check by a suitably qualified ecologist will be required to confirm the absence of any nests prior to vegetation clearance or demolition. This will include a precautionary walkover of the grassland to ensure there are no ground-nesting birds. Clearance will only proceed when the ecologist has established the absence of any active bird nests. If any active nests are identified, a buffer of at least 5m will be maintained and the nest left undisturbed until the young have fledged or works will be postponed. Native species-rich hedgerows will be planted and a variety of bird boxes will be installed across the site.

Dormice

To date, no dormice have been found on site, although they are known to be present in the local area. An impact assessment for this species will be made once all surveys are complete.

Reptiles

To date, grass snakes and slow worms have been recorded along the stream, within the marshy grassland and at the mouth of the ditch. If the final three surveys have similar results, precautionary habitat manipulation will be recommended, along with habitat enhancements, to ensure reptiles are not negatively impacted by the development.

Invasive Non-native Species

To ensure there is no further spread of invasive non-native species (INNS), the Japanese knotweed and montbretia recorded on site must be eradicated by a specialist prior to commencement of works. The site should be monitored for any repeat growth of INNS and managed accordingly, to ensure the eradication of INNS at the site.

Further Surveys

Table 3 provides a summary of the additional ecological surveys required at the site and states when the surveys can be conducted in accordance with best practice guidance.

Table 3. Further ecological surveys required at Sugworth.

Survey	Timing	Notes
Potential Roost Feature (PRF): Buildings	Prior to demolition	Endoscope of the two identified PRFs
Potential Roost Feature (PRF): Trees	Any time of year	Any trees which will be directly impacted by the development must be assessed for PRFs, with a subsequent emergence survey or endoscope survey if necessary.
Bat activity survey	August 2020	The third and final activity survey
Bat static loggers	September 2020	The fourth and final deployment
Dormice presence / key absence survey	August – October 2020	Three more surveys required
Reptile presence / key absence survey	August – October 2020	Three more surveys required

I trust this information is sufficient for your records. Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op.

Kind regards



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