

September 2019

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

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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.	

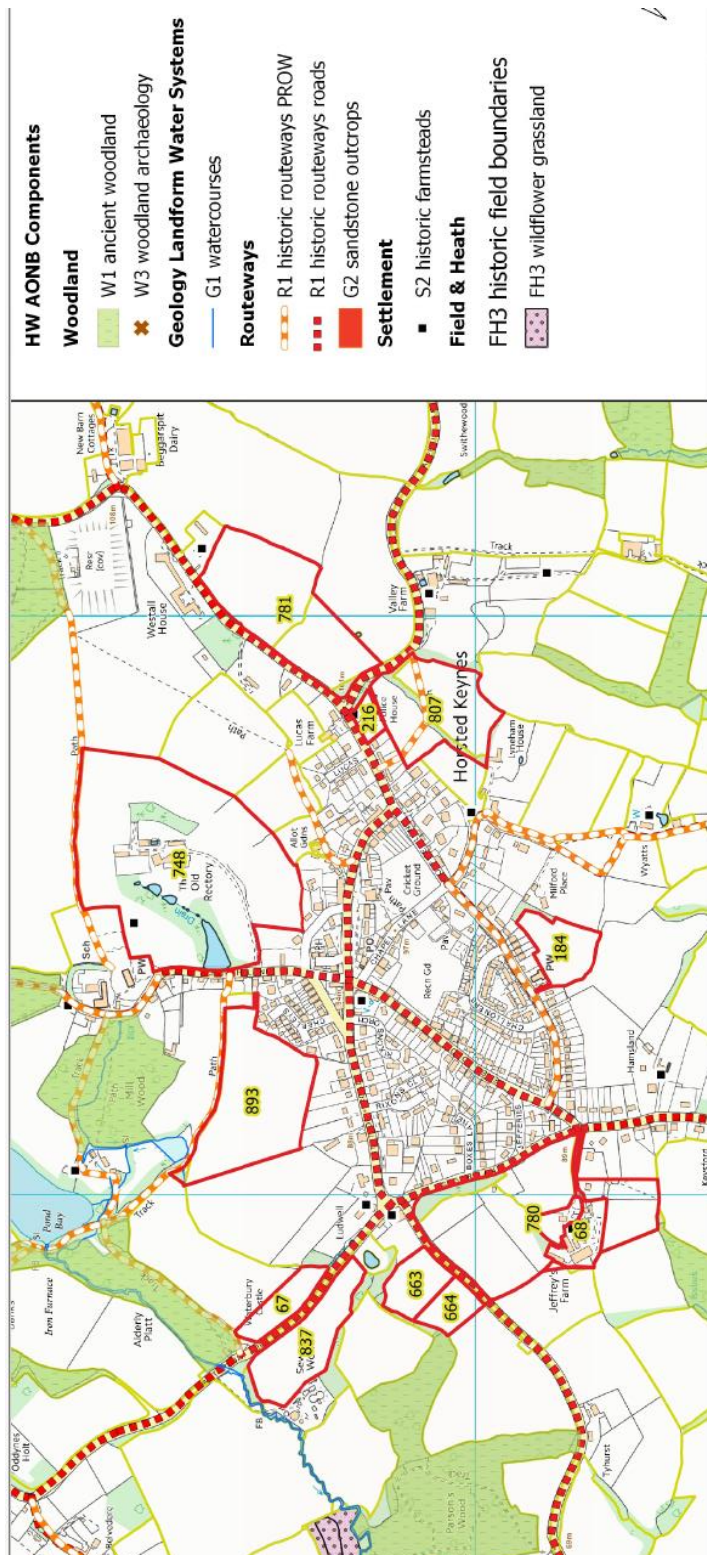
Land at Jeffreys Farm #971 (fields to South) – 12 units (AS PER LANDOWNER PROMOTION) (0.86 ha)

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

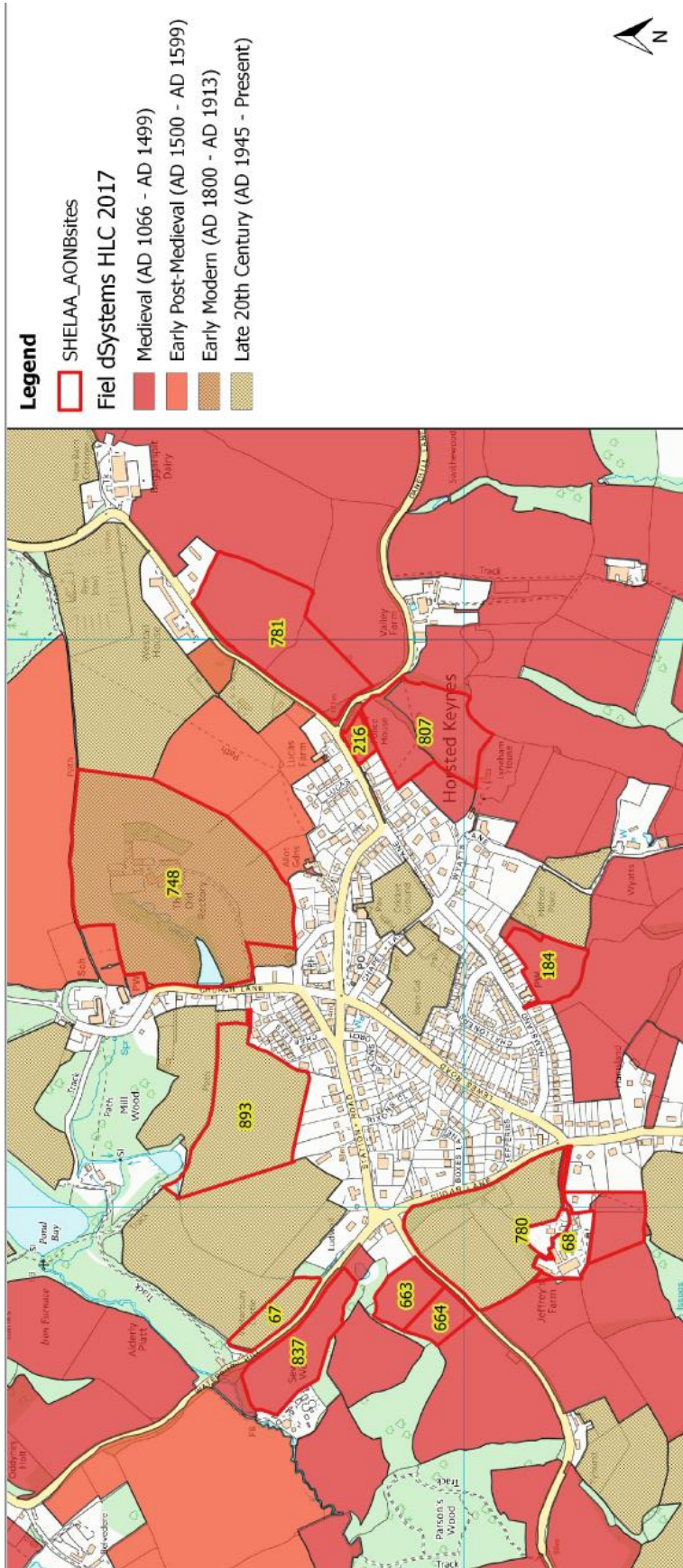
SHELAA Site 971 (part of site 780)	Land at Jeffery's Farm, Sugar Lane, Horsted Keynes (the southern field of site 780, south of site 68)	12 units
Geology, landform, water systems and climate <i>Topography and watercourses</i>	Undulating field to south of farmyard (site 68). No watercourses mapped.	
Settlement <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.	

Appendix 2 – Map of sites assessed – taken from the AONB report dated Oct 2018

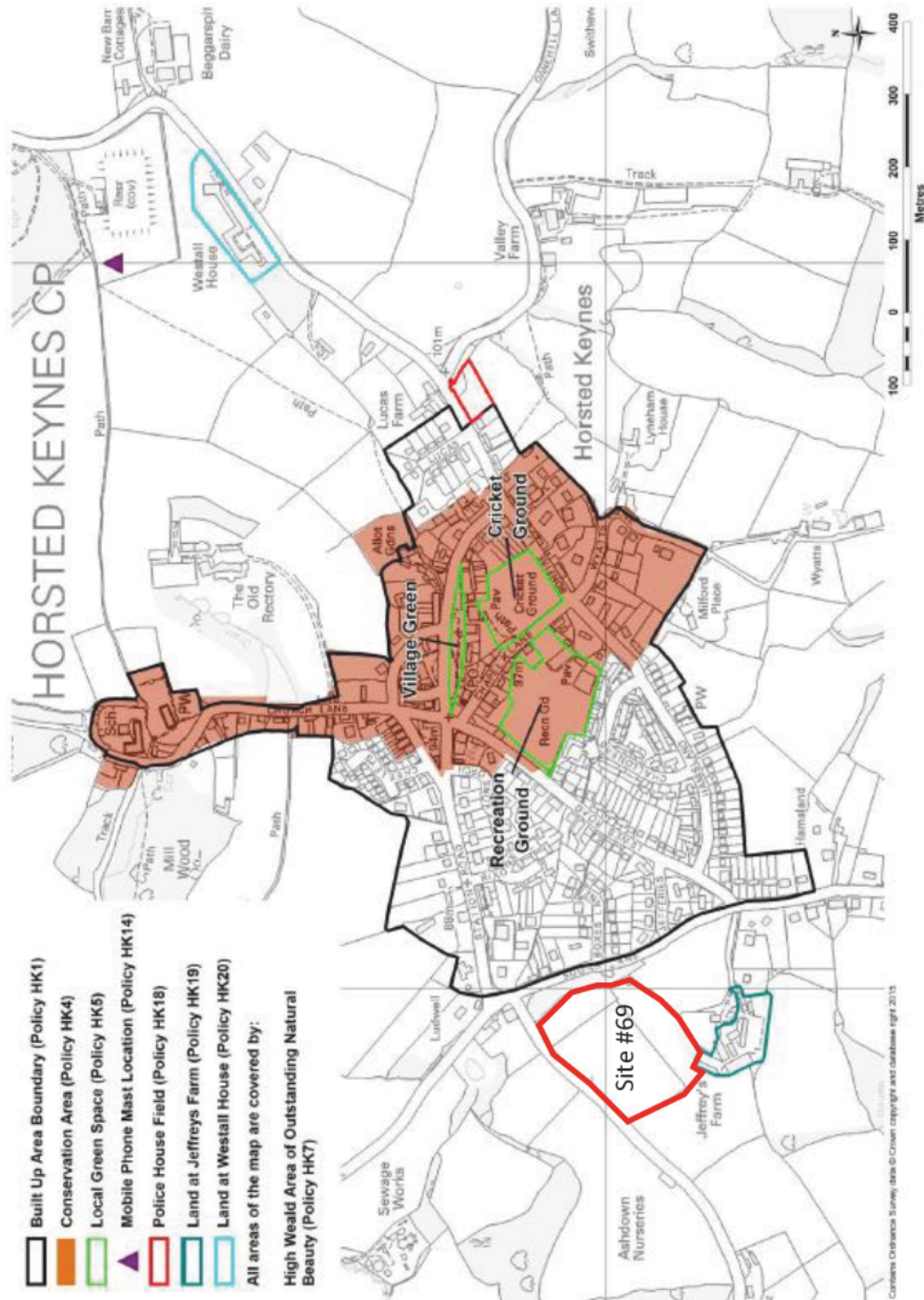
Note that Site #780 at Jeffrey's farm was amalgamated by MSDC, and has since been re-subdivided in to 2 sites: site #69 (northern field) and site #971 (southern field) – eastern field withdrawn from SHELAA assessment.



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



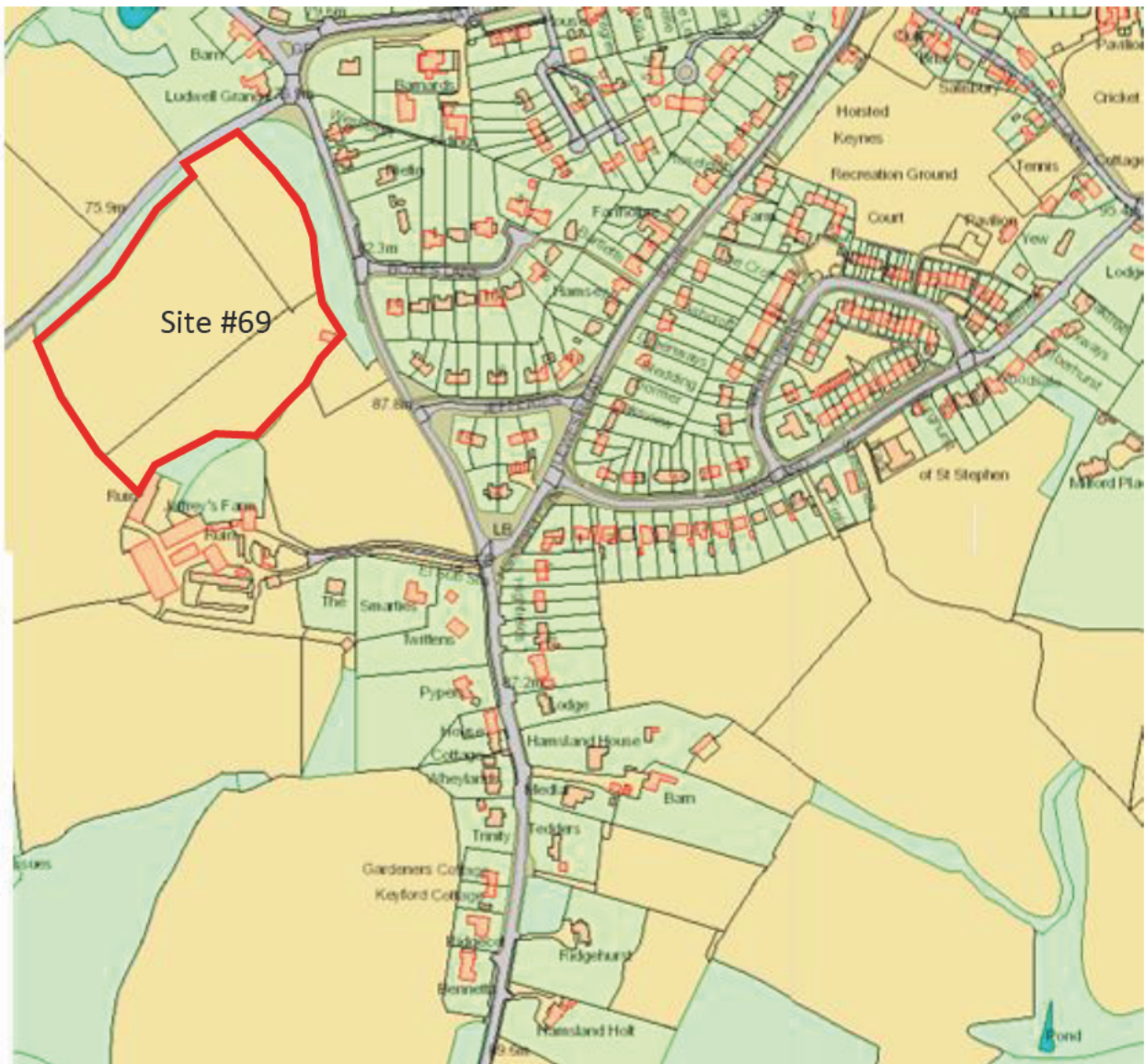
Appendix 4 – Map of Horsted Keynes Built up area Boundary – from the Horsted Keynes Neighbourhood Plan (submitted Nov 2017, withdrawn July 2018), with site #69 added in red outline



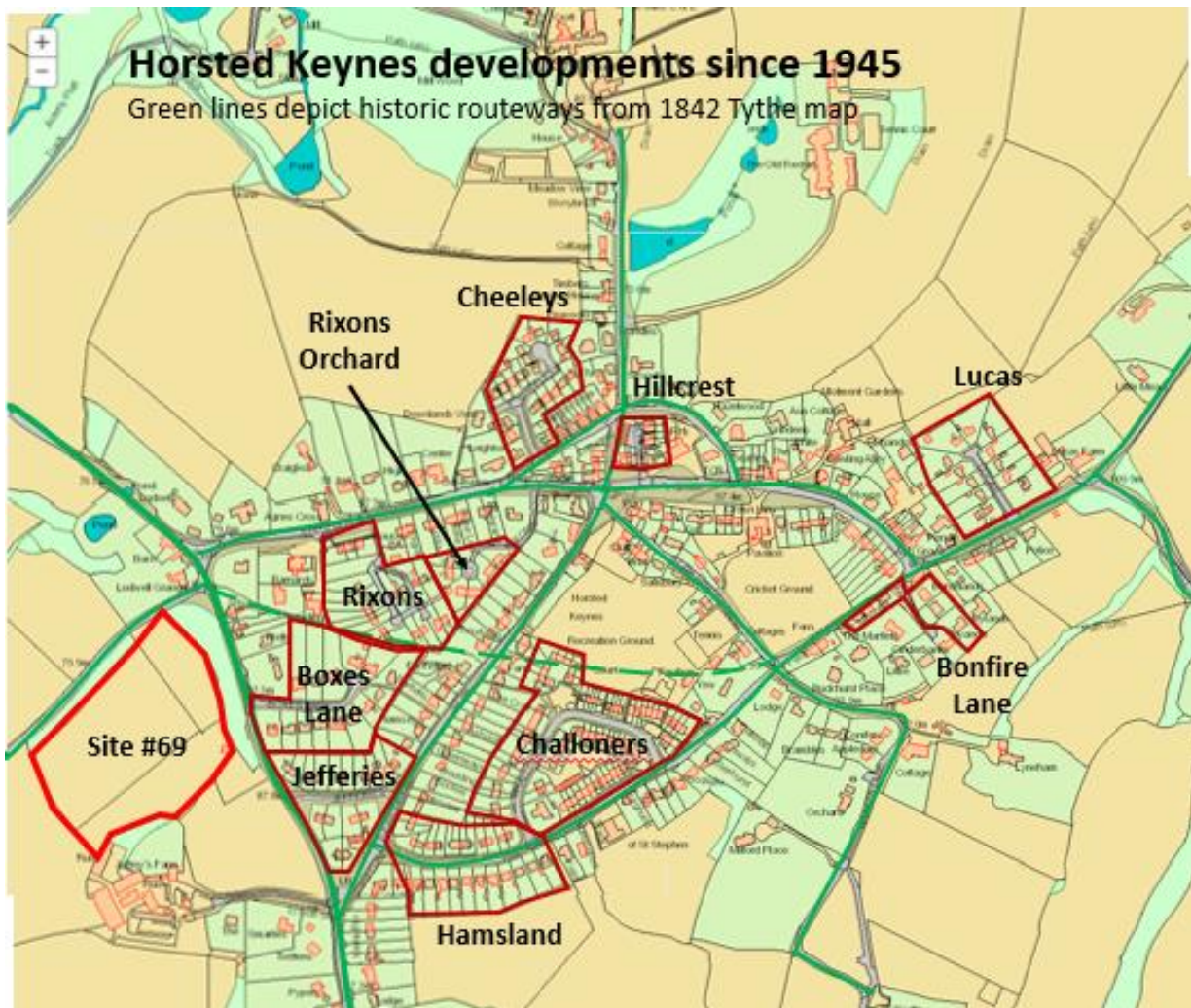
Appendix 5 – Detailed map of the western side of Horsted Keynes 2019 (from the MSDC planning website)

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

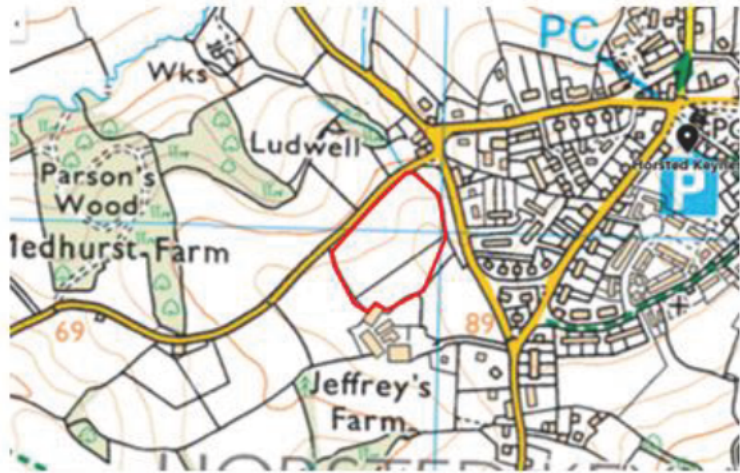


Photo 1 – View north from site #69 towards Ludwell (Listed building)

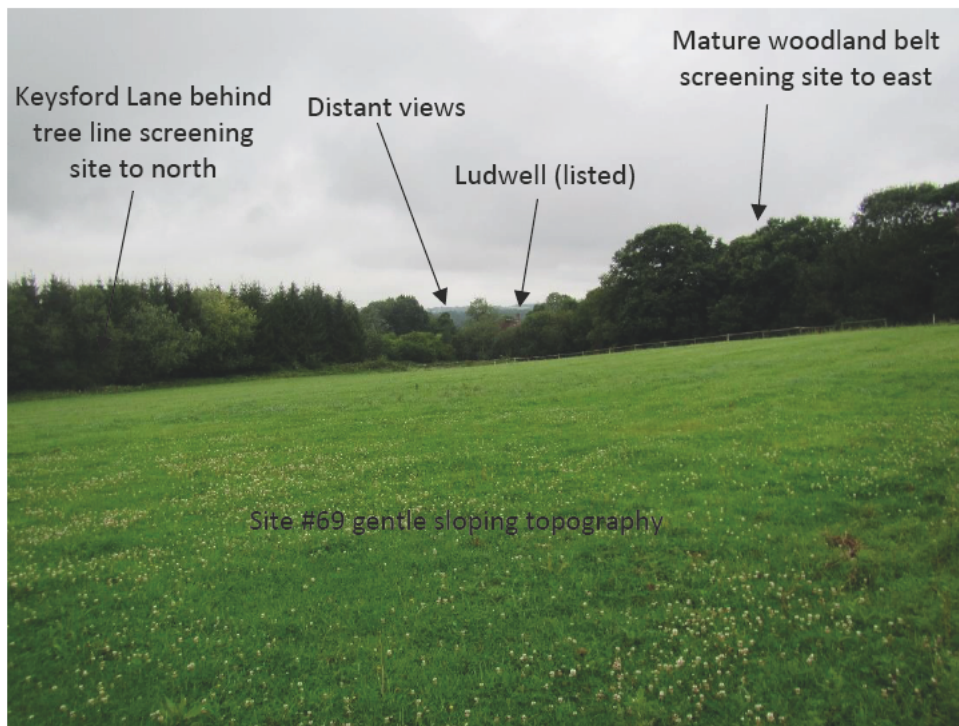


Photo 2 – View north-east from site #69 towards Boxes Farm (listed building)

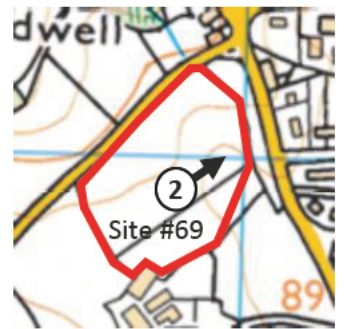


Photo 3 – View south from site #69 towards Jeffreys Farmhouse

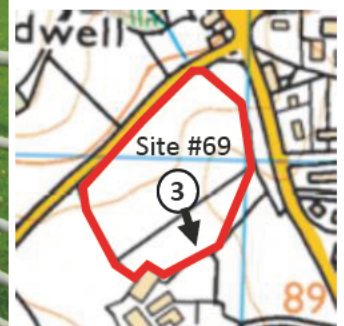


Photo 4 – View south-west from site #69

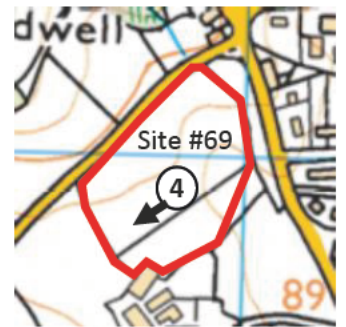
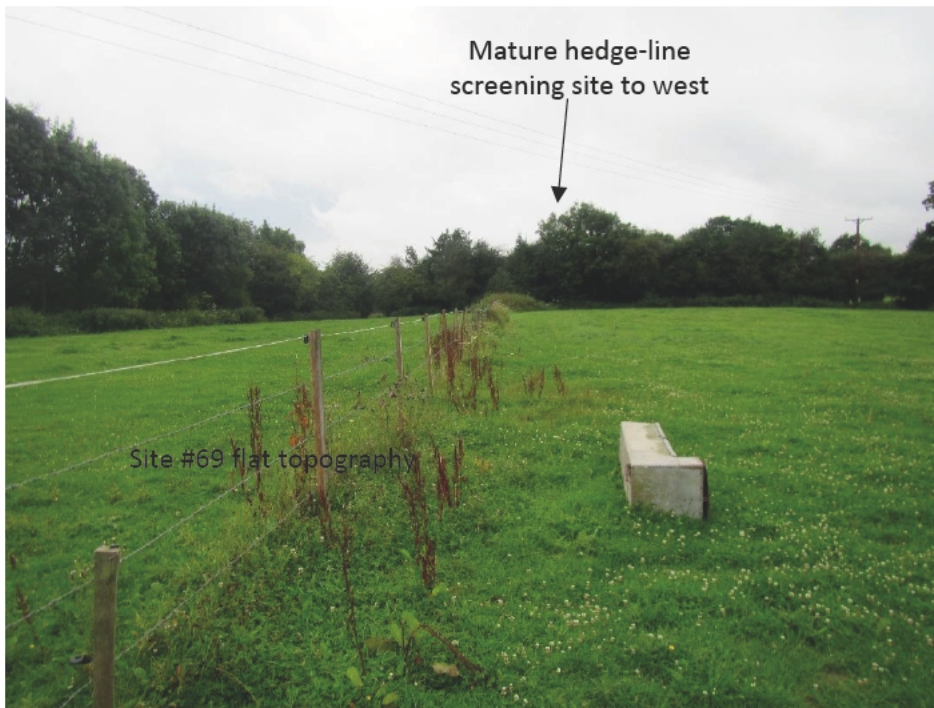


Photo 5 – View north-west from site #69 towards Keysford Lane

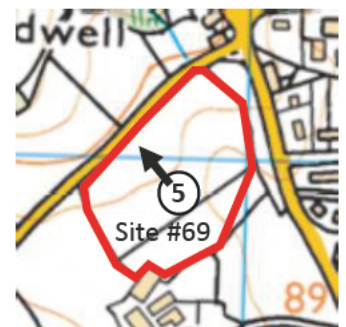
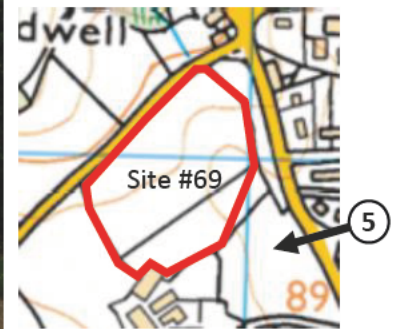
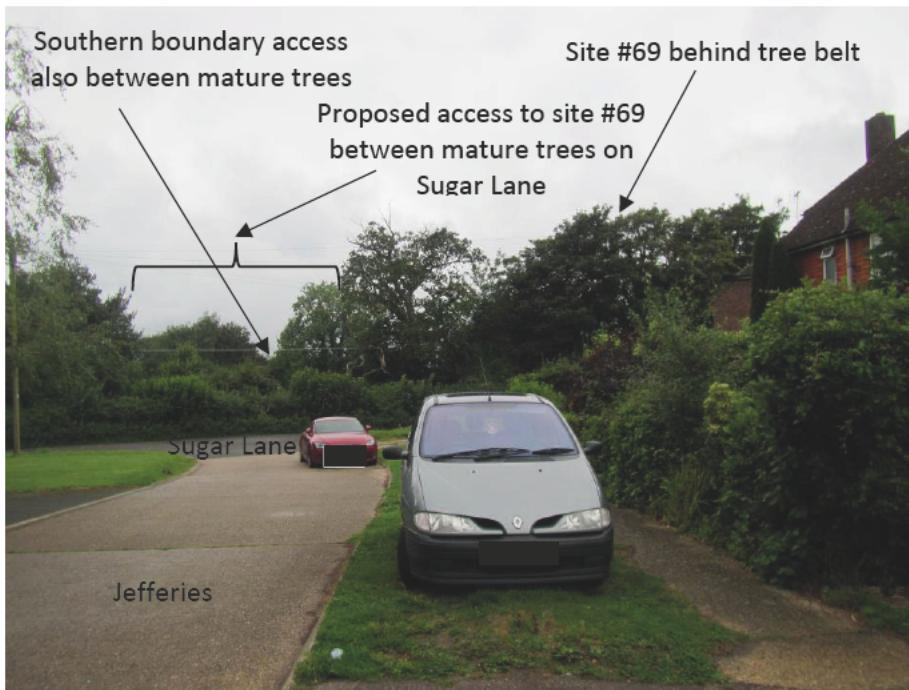


Photo 5a – View west from Jefferies across Sugar Lane to the access point in to site #69



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.

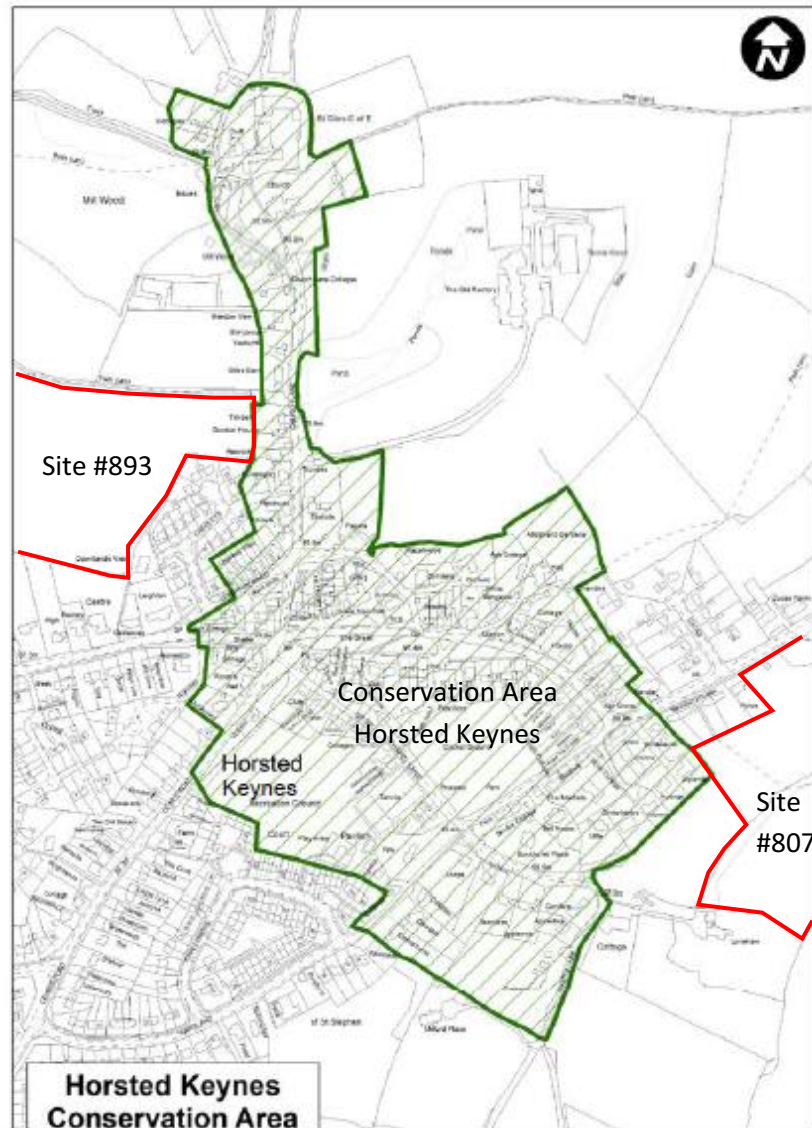


Photo 6 – View east across site #893 towards Cheeleys

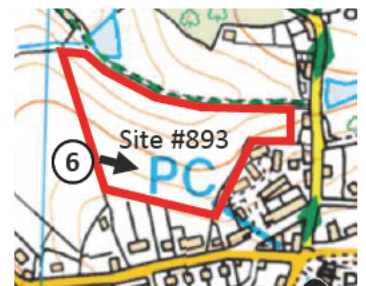


Photo 7 – View north-east across site #893 towards St Giles Church and the Conservation Area

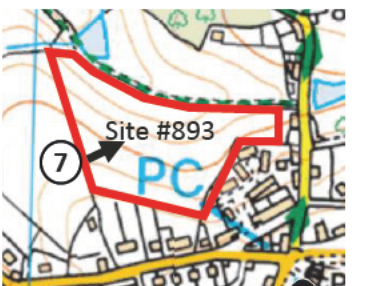


Photo 8 – View south-west across site #893

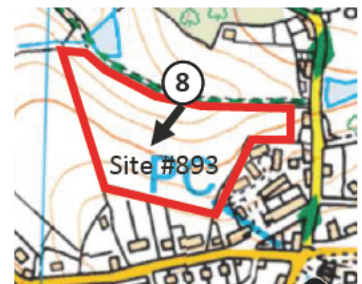
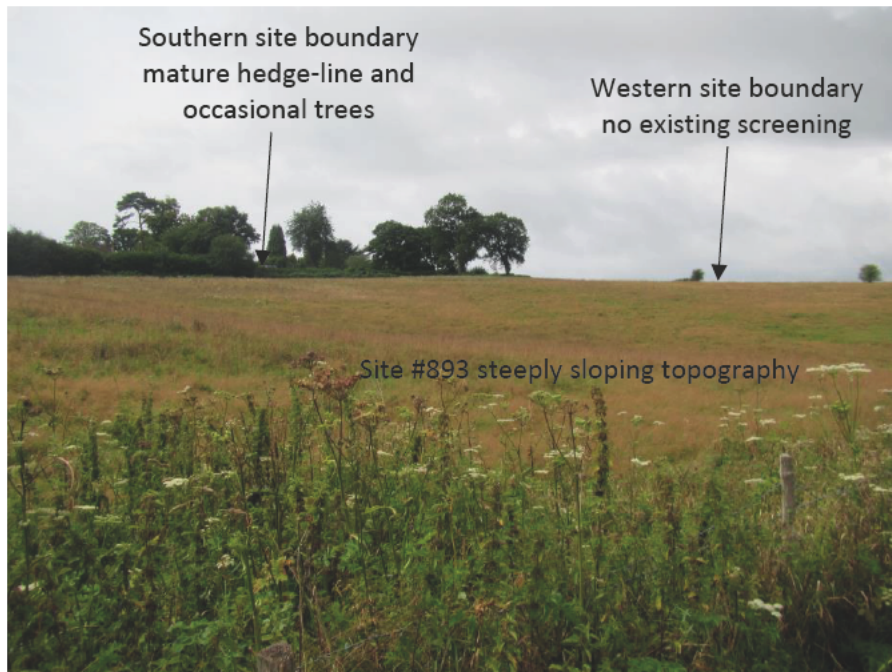


Photo 9 – View south-east across site #893 towards Cheeleys

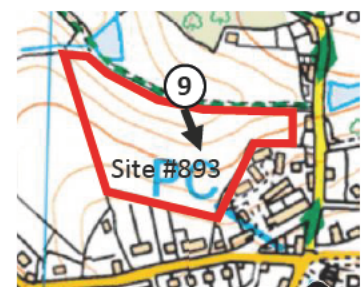


Photo 10 – View east along the northern boundary of site #893 looking along the public footpath

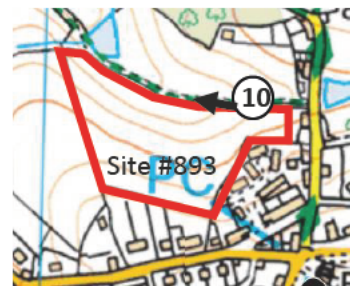


Photo 11 – View west across site #893



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

Site #184 flat topography

12
Site
#184

Photo 13 – View south-east across site #184

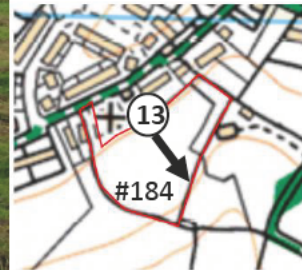


Photo 14 – View south across site #184

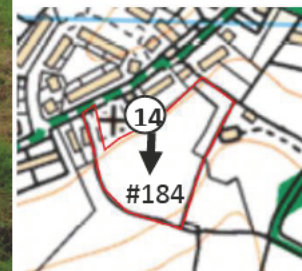


Photo 15 – View south-west across site #184 looking along northern boundary to site. Note as per the developers plans the trees to the right of the picture will all be removed as access road will affect root systems.



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.

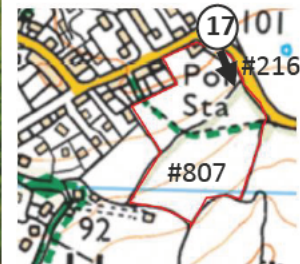


Photo 18 – View west across site #216 towards Police House.

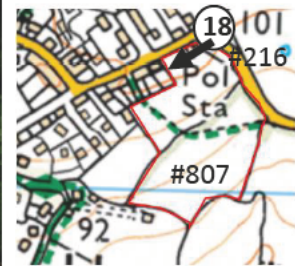


Photo 19 – View south-west across site #807 looking down the footpath that crosses the site.

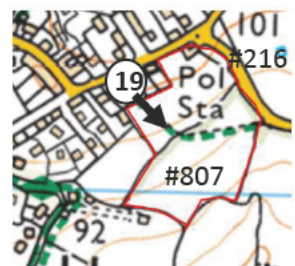


Photo 20 – View north across site #807 looking towards Police House from footpath, towards the strip of site #216 along Birch Grove Road.

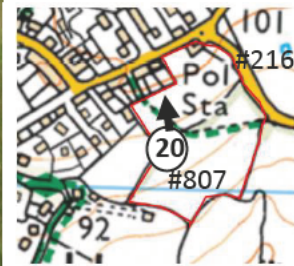


Photo 21 – View south-west along the Western boundary of site #807



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

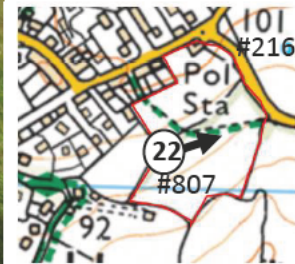


Photo 23 – View east along the northern boundary of site #216 along Birch Grove Road – access to the site will be here.

