



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.

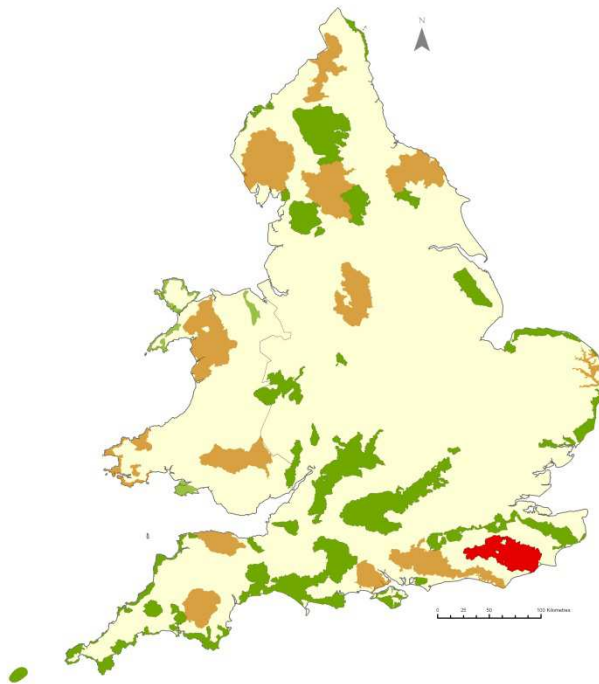
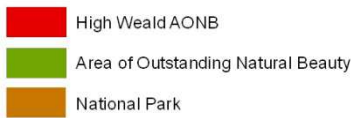
All site assessments are largely a matter of informed judgement rather than a numerical exercise that can be definitively quantified. We have made the AONB assessments as objective and transparent as possible by using a consistent template, linking the criteria directly to the High Weald AONB Management 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).