

Horsted Keynes Neighbourhood Plan - Summary of Representations

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
108	1	Ms H Hyland	Environment Agency			Support	We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.
108	2	Ms H Hyland	Environment Agency			Neutral	The Environment Agency submitted standing advice.
116	1	Ms C Tester	High Weald AONB Unit			Neutral	<p>The text of paragraph 6.11 is generally supported. However, due to further research being undertaken on behalf of the High Weald AONB Unit on the history of Horsted Keynes (see attached report), it is recommended that the text under the heading 'Settlement' be amended to:</p> <p>Settlement: the main settlement is the village of Horsted Keynes, which originated in Saxon times on a knoll to the north of the current village with the oldest building being where the parish church of St Giles, dating back to the 11th century, now stands. A separate and later trading settlement then grew up around the commons and intersecting routeways to the south, and now forms the main part of the village. There are also small hamlets (Birch Grove, Cinder Hill and Freshfield) and over thirty historic farmsteads dispersed across the parish dating from medieval periods to the nineteenth century</p>
116	2	Ms C Tester	High Weald AONB Unit		6	Support	The wording of HK6: High Weald AONB is strongly supported and will help to ensure that this nationally designated landscape is conserved and enhanced as required under Section 85 of the Countryside and Rights of Way Act 2000 and paragraphs 115 and 116 of the NPPF.

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189	1	Mrs M Brigginsshaw	Wealden District Council				Object	<p>Thank you for providing us with an opportunity to provide comments on the pre submission Horsed Keynes Neighbourhood Plan.</p> <p>We note that this Neighbourhood Development Plan has been subject to a Habitats Regulations Assessment (HRA) undertaken by Mid Sussex District Council dated 16th October 2017 which updates an earlier assessment undertaken on 5th April 2017. This update takes into account the September 2017 HRA for the emerging Mid Sussex Local Plan and we understand that this assessment should be read in conjunction with the screening opinion for the draft neighbourhood plan. The HRA screening concludes that through the conclusions of the District Plan HRA, this updated screening assessment shows that there would be no likely significant effects on the Ashdown Forest SAC from the policies in the Horsed Keynes Neighbourhood Plan.</p> <p>Attached to this response is a letter dated 13th November 2017 outlining Wealden District Council's response to the Main Modifications of the Mid Sussex District Plan 2014 – 2031. The content of the representation to Mid Sussex dated 13th November 2017 is therefore relevant to the Neighbourhood Plan and its HRA on the basis that the Neighbourhood Plan HRA relies on the Mid Sussex HRA. The letter, therefore, forms part of Wealden District Council's representation to the pre submission Horsed Keynes Neighbourhood Plan.</p> <p>The letter dated 13th November 2017 identifies a number of deficiencies within the HRA, which are of relevance, and concludes that the assessment contained within the Habitat Regulations</p>

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							<p>Assessment is of the plan alone and has not included an in combination assessment as required by The Conservation of Habitats and Species Regulations 2010. Therefore the Habitats Regulation Assessment is fundamentally deficient to that required by the legislation. In addition the letter concludes that in the absence of an appropriate assessment the Plan does not meet the Conservation of Habitats and Species Regulations 2010 (as amended) and therefore should not progress. Please note that the Regulations have now been updated, however the content of the legislation in relation to the representation has not been altered.</p> <p>Given the HRA for the draft neighbourhood plan is based on the HRA for the Mid Sussex Local Plan, taking into account the contents of the attached letter, we therefore consider that the neighbourhood plan does not meet the necessary legal tests and requirements as relevant to the Habitats Directive and Conservation of Habitats and Species Regulations 2017</p>
1846	1	Mr M Smith	The Rail Estate Consultancy	Bluebell Railway Plc		Support	<p>Our previous comments in 2016 regarding the Regulation 14 draft welcomed the inclusion of paragraph 2.3 about the Railway as part of the village's local context and history. This has been retained in the present version, and helpfully refers to the history of the village's Victorian railway connection, as restored and maintained by the Bluebell Railway, with acknowledgement that the Bluebell Railway has brought many tourists to the village.</p>
1846	2	Mr M Smith	The Rail Estate Consultancy	Bluebell Railway Plc		Support	<p>The inclusion of an additional reference to the Bluebell Railway in the Business and Employment section (para 7.4) is also welcome, with regard to expansion of existing commercial premises. This helpfully recognises the Railway's ongoing commitment to improve and expand its visitor and maintenance facilities and workshops (including creation of new training opportunities at a Heritage Skills Centre) whilst respecting the local environment context.</p>

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1846	3	Mr M Smith	The Rail Estate Consultancy	Bluebell Railway Plc		3	Support	We have previously welcomed the importance the HKNP places on maintaining local character and ensuring good quality design. We had previously noted that HKNP policies in the Regulation 14 version had not specifically referred to protection of designated heritage assets and their setting. We are pleased that HKNP policy HK3 now provides that: "Development must not have an unacceptable impact on the setting of any heritage asset" which is a very helpful addition.
1846	4	Mr M Smith	The Rail Estate Consultancy	Bluebell Railway Plc			Neutral	<p>It is noted that there is no reference to the proposed western extension of the Railway from Horsted Keynes to Haywards Heath via Ardingly (reinstatement of the Ardingly branch line), the route of which is safeguarded by adopted and emerging strategic planning policies. A section of this route (about a third of a mile in length) lies within the Horsted Keynes parish boundary to the south-west of Horsted Keynes station, where a bridge to replace the demolished viaduct would be constructed across Station Approach as part of the connection to Ardingly.</p> <p>While it is not the role of Neighbourhood Plans to replicate Local Plan strategic policies, the HKNP acknowledges that it must be in general conformity with such policies - part of meeting the basic conditions for Neighbourhood Plans. It is noted that the HKNP provides a list of strategic policies at paras 2.33 to 2.36 and that Local Plan policy HK3 (Bluebell Railway) is listed, whereas both adopted policy R14 (Tourism) and emerging policy DP17 (Sustainable Tourism) are absent.</p> <p>Local Plan policy HK3 refers directly to the safeguarding of the route of the disused branch line at Horted Keynes, and policy R14 is a more general strategic policy referring to Tourism in connection with the safeguarding of the line. Both refer to the safeguarded route illustrated on the adopted Local Plan proposals map. We therefore suggest that Local Plan policy R14 should also be included at para 2.33.</p> <p>In addition, R14's replacement, emerging strategic District Plan policy DP17: Sustainable Tourism, aligns with the District Council's strategic objectives of achieving a healthy rural economy and enhancing Mid Sussex as an attractive visitor destination. We therefore suggest that emerging District Plan policy DP17 should be added at paragraph 2.36.</p>

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15279	1	Ms M Ashdown	Natural England			Neutral	<p>Natural England previously supplied specific advice about the HRA in our letter dated 30th March 2017.</p> <p>As the proposed Neighbourhood Plan covers an area that falls within the High Weald AONB, Natural England recommends you seek the advice of the AONB Unit for their comments.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>

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15279	2	Ms M Ashdown	Natural England			Neutral	<p>Thank you for your consultation on the above dated 21 March 2017 which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Recreational Impacts on Ashdown Forest</p> <p>An existing mitigation package is already in place within Mid Sussex District for development coming forward that would result in additional recreational pressure on Ashdown Forest. This is the agreed two prong approach of the developer funded strategic management and monitoring strategy (SAMM) and suitable alternative natural greenspace (SANG) referred to in the HRA. Natural England concur with the conclusion of the HRA with respect to recreational pressure that there would be no adverse effect on the integrity of Ashdown Forest SPA and SAC due to the agreed mitigation measures that would avoid such an effect.</p> <p>Air Quality</p> <p>Section 4.3 of the Screening Report (17th March) refers to air quality impacts. Please note the following.</p> <p>A High Court judgment was handed down on 20 March 2017 in Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin). Wealden District Council brought a challenge against a Joint Core Strategy produced by two of its neighbouring authorities. Natural England provided advice to Lewes District Council and the South Downs National Park Authority on the assessment of air quality impact on Ashdown Forest SAC. This advice was based on nationally developed guidance agreed with other UK statutory nature conservation bodies. The court found that Natural England's advice on the in-combination assessment of air quality impacts in this case was flawed. We are considering the details of this decision and the implications for our advice. Competent authorities should seek their own legal advice on any implications of this recent judgment for their decisions.</p> <p>General Points</p> <p>Paragraph 2.17 of the HRA states "Lewes District Council is considering options for delivering a SANG". This situation is now updated and Lewes DC have agreed a SANG option.</p> <p>Paragraph 5.8 of the screening report is misleading and we recommend the</p>

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								<p>wording of this is amended. As currently worded this section suggests that if there is no significant effect “alone” then an “in combination” assessment is not required. This is not in accordance with the Habitats Regulations. Many small contributions that may not be significant “alone” but are above the level of de minimus could act cumulatively to have a likelihood of significant effects; as is the case with recreational pressure on Ashdown Forest. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>

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15446	1	Mrs S Karle				Object	<p>I am writing to object to one aspect of HKNP.</p> <p>I do not agree with the housing policy as laid out in this plan. There has been no thought as to how affordable housing can be provided as there are only proposals for sites of 10 dwellings or less, which will not address this very real need.</p> <p>I do not understand why the proposed greenfield sites: HKNP014, HKNP015 and HKNP016, at Jeffreys Farm, was rejected. There does not appear to have been much discussion of this site by the village in the consultation exercise.</p> <p>Further to this, there seems to have been no discussion of it when it went forward to MSDC for planning permission. I would like to know why this happened.</p> <p>It is the obvious place to extend the village, with a much smaller visual impact than other sites that are being considered, while fulfilling the acknowledged need for many houses.</p> <p>The proposed developers have stated that there would be a large proportion of affordable houses in this development. Included in the plans were also proposals for an open green space and wildflower meadow. This would assist with the SANGS requirements and be positive for wildlife.</p> <p>With very little work, mitigation of the views of this site can be carried out by proper agreed planting of trees and reinforcing existing mature hedgerows.</p> <p>The RAG report considered that this site was suitable for development with the only problem being that of access.</p> <p>Access for cars and pedestrians could be via a corner of HKNP017 as this is owned by the same family who own HKNP014, HKNP015 and HKNP016. The covenant on this land only prohibits building on this area. Access opposite Jefferies onto Sugar Lane could be achieved with minimum disruption to ancient trees.</p>

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15598	1	Ms E Challenger	Strutt & Parker	Trustees of the Paddockhurst Estate	17	Neutral	<p>The Ovenden Nominees Ltd own Police House Field, which is proposed as a housing allocation for approximately 10 units in Policy HK17. We support this allocation on their behalf, and work is currently underway to prepare a planning application for the proposed development, which would be fully in accordance with policies contained in the Neighbourhood Plan. Technical work has been undertaken in relation to site levels, trees, ecology, transport and drainage, and a Site Layout has been prepared for a 10-unit scheme. We have also engaged with WSCC Highways, who have confirmed that the proposed single point of access from Birchgrove Road is suitable to serve the development and that there would be no adverse impact on highway safety as a result of cars entering and exiting the site. The impact of the Oak tree along the site frontage has also been taken into account and we can confirm that adequate visibility splays can be achieved from the new site entrance. The roots of the Oak tree would also be protected within the development site. Importantly, there are no Category A trees on the site that would require removal in order to provide the space needed for ten dwellings. The southern boundary could be landscaped to provide a natural, defensible boundary between the residential development and the wider countryside, with a swale within it as part of a SuDS strategy. The field to the south is within the same ownership so this feature would not need to encroach within the developable area that is defined by the site allocation.</p> <p>The area proposed for allocation at Police House Field has arisen as a result of previous SHLAA work undertaken by Mid Sussex; however we note that this work has received criticism from the Inspector during the Local Plan Examination, and the District Council is currently reviewing all SHLAA sites as a result. This is important, as we believe there is merit in allocating a larger site at Police House Field, which follows a landscape-led approach. We submit with these representations a Landscape Appraisal prepared by Allen Pyke Associates, which assesses key views into the site in order to determine which areas are suitable for development and which are not. The report concludes that the remainder of the Police House Field (referred to as 'North Field') is suitable for development, whilst 'South Field' is less so. Allen Pyke have found no reason why development at Police House Field should be limited to the current proposed allocation, and we therefore instead propose an allocation that extends right up to the southern boundary of North Field. South Field could be left as it is, or it could be used as an area of public open space which incorporates SuDS features and areas of biodiversity enhancement. We do not</p>

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propose a formal play space in this area given its potential visual impact, but also because the village appears to be well provided for in this respect. Instead, we propose an informal parkland area that includes ponds, meadows, footpaths, as well as seating areas. No landscape assessment of the site has been prepared to date in the way that Allen Pyke have done, and the broad brush assessment carried out for the SHLAA is not sufficient to contest our findings. We have submitted Allen Pyke's assessment to the Mid Sussex SHELAA currently being prepared, and we await the Council's response to it.

Importantly, we note that the Neighbourhood Plan does not allocate enough dwellings to meet the proposed District Plan requirement, and that this is largely to do with a lack of suitable sites coming forward. It is regrettable that we have not had an opportunity to discuss a larger site with the Parish Council in the past, but we do not consider it to be too late for the plan to be amended in light of this new information. An enlarged allocation at Police House Field could provide the additional numbers the Parish needs to meet its local housing need. A larger site at Police House Field could measure 3.5ha, to include both the North Field and South Field, with only the North Field (approximately 1.1ha) being suitable for housing development, and South Field being suitable for open space. Up to 40 dwellings could be accommodated within this area, which would take the overall housing provision much closer to the figure proposed in the Mid Sussex District Plan. A larger site allocation would also provide much-needed on-site affordable housing, which we note the draft Neighbourhood Plan currently does not make provision for. North Field is much less sensitive than the western and northern parts of the village where other sites have been promoted for residential development. Importantly, once the road frontage has been built in accordance with the Neighbourhood Plan allocation for 10 units, the remainder of the North Field would no longer be visible from the road and there would be very little merit in its retention as a field.

In summary, we request that site allocation HK17 is amended to include the entirety of the same field (North Field) and to allocate it for up to 40 dwellings, along with an area of open space in the field to the south. A plan is submitted showing the new area being proposed. The new site would be served by a single point of access, in the same location as the one proposed for the 10-unit scheme.

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15624	1	Miss H Clarke	Sport England			Neutral	Sport England submitted standing advice.

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16640	1	Mr T Rodway	Rodway Planning				Object	<p>It is considered important to acknowledge that the recently consulted Main Modifications (MM) to the Mid Sussex District Plan introduced Policy DP5a entitled 'Planning to Meet Future Housing Need'. The supporting text to this policy sets out a Neighbourhood Plan Strategy. As noted above, the submission version of the NP only provides allocations for a total of 24 residential units (with 8 of these comprising specialist accommodation at Westall House). The District Plan MM's sets out that the "minimum requirement over the plan period" sees Horsted Keynes having to provide at least 69 units, which when taking into account existing commitments and completions amounts to 53 units. When set against the draft NP provision of 24 units, this leaves a residual requirement of at least 29 units. Given the tightly drawn built-up area boundary and the constraints at the centre of the village (Conservation Area and Listed Buildings), it must be accepted that the residual quantum of development can only be satisfied by providing new housing outside of the built-up area on currently unallocated (or proposed to be allocated) land, which by virtue of the sites location, must mean also developing within the High Weald AONB.</p> <p>The current version of the emerging Mid Sussex District Plan establishes (following detailed examination and the conclusions of the examining Inspector) that the Objectively Assessed Housing Need for the District as a whole is considerable. Policy DP5 'Housing' of the District Plan identifies that "there is a minimum District housing requirement of 16,390 dwellings between 2014 – 2031... The Plan will deliver an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31".</p> <p>We consider that the NP must acknowledge this housing need, and it should go further in setting out how it will assist with meeting this need. Currently the submission version of the NP only goes as far as allocating 24 dwellings, which is considerably less than that considered to be suitable for the Parish, as set out in the emerging District Plan. This is considered to not only be a missed opportunity, but also fails to provide a cohesive development plan for the area. There is no identification or mention of how this shortfall in housing numbers is to be met.</p> <p>Horsted Keynes is identified at Policy DP6 ('Settlement Hierarchy'), as being a Category 3 settlement, which are described as "Medium sized villages</p>

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								<p>providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.”</p> <p>We consider that Horsted Keynes is suitable for an increased housing provision. Evidently the settlement has a planning boundary, and by Mid Sussex standards is relatively sustainable. The village benefits from a range of facilities, including a school, shop, public houses, community facilities, a church, bus services, and the village is also within easy reach of the mainline railway station at Haywards Heath. We therefore argue that Horsted Keynes must be considered suitable for an increased number of units, which will ease the pressure on other more rural and/or constrained parts of the District.</p>
16640	2	Mr T Rodway	Rodway Planning		1		Object	<p>We suggest that the 10-unit cap be removed. In order to provide the housing needed within the Parish, and in lieu of any further NP allocations (although we are of the view that our site should be added as an allocation), we are of the view that such an approach to meet the shortfall in housing numbers would result in the provision of piecemeal developments, with little or no discernible public benefits. For instance, 10 unit or less schemes would not require any affordable housing provision.</p>
16640	3	Mr T Rodway	Rodway Planning		6		Object	<p>This policy, as currently worded, appears to go above and beyond the policy criteria for considering development in the AONB, as set out at paragraphs 115 and 116 of the National Planning Policy Framework (NPPF). We therefore suggest that this policy is re-worded so that it is consistent with this national policy.</p>

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16640	4	Mr T Rodway	Rodway Planning				Object	<p>We consider that the NP should be adapted in order to acknowledge the importance of Horsted Keynes in terms of its position within the settlement hierarchy in Mid Sussex District, and that its relatively unconstrained location coupled with its sustainability credentials make the settlement suitable for an increased number of dwellings, which will assist the District in meeting its objectively assessed housing needs, and reduce the burden placed on other more constrained and/or less sustainable settlements.</p> <p>The supporting text and/or the Policy itself should indicate that the village can deliver an increased number of dwellings throughout the plan period. Further allocations should be included. We contend that our clients land should be considered positively for such a further housing allocation. By stating that an increased number of housing units can be delivered in and around Horsted Keynes (at least as many as set out in the emerging District Plan policy DP5a), and then make proactive steps to add further allocations to account for this would put the Parish in a strong position as and when any site allocations document is progressed by the Local Authority following the adoption of the District Plan.</p> <p>Therefore, we suggest that a policy is added that addresses housing need, and specifically accepts the principle of new development being provided outside the built-up area boundary, provided it is sustainably located, and in compliance with other policies contained in the Development Plan as a whole. Reference should also be made within the policy to provide an indication of the minimum level of housing that is deemed suitable for the Parish within the Plan period.</p> <p>In order to meet this established housing need, we also contend the NP should go further than this, and it should now be updated so as to add our clients promoted land on Birchgrove Road as an allocation for around 45 new dwellings.</p>

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16640	5	Mr T Rodway	Rodway Planning				Object	<p>Our submissions relate to our client's site 'Land at Birchgrove Road'. This is a land parcel that my client's have been actively promoting for some time. The site measures site measures approximately 4.74 hectares (11.72 acres) in size. It sits on the edge of the existing settlement of Horsted Keynes, on the north-eastern boundary. The site has a slightly sloping topography from north-west to south-east and is bounded by arable land on the east and southern edges. Birchgrove Road runs along the northern side of the site and is met by Danehill Lane that passes along the western edge. There are currently no public rights of way through the site and means of access will have to be provided with the creation of new entrances. Within the site there are two distinct areas which are divided horizontally by a 1.5m high hedgerow belt with some tree planting. The remainder of the site comprises arable land.</p> <p>The site is not currently proposed to be allocated for residential development. The Parish Council's Site Assessment process (dating from 2014 and 2015) was undertaken prior to our promotion of the site. Therefore, the availability of our client's land inclusion as an allocation in the Neighbourhood Plan (NP) does not appear to have been given the requisite attention or consideration by the Parish as part of its preparation of the NP. Notwithstanding this lack of assessment, we contend that the site in question is suitable, available and achievable for residential development.</p>

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16640	6	Mr T Rodway	Rodway Planning			Object	<p>Conclusions</p> <p>We put forward this site with the intention to provide high quality housing in an area with an identified need. We have made it clear via the above representations and documents attached to the current planning application (MSDC application reference DM/18/0195) that the site is eminently available, sustainably located and can provide much needed new residential units.</p> <p>The Parish Council's proposed housing allocations do not provide sufficient housing for the Plan period, as identified in the District Plan. Therefore, the NP will not provide for the future needs of the local area, or the wider District. Horsted Keynes is a sustainable location in the context of Mid Sussex District (identified as being a Category 3 Settlement), and we consider that it should be aiming to provide an increased housing figure during the Plan period.</p> <p>A significant amount of work has already been undertaken, and the conclusions of which clearly identify that the site is suitable for development. Further, the site is available and achievable.</p>
17558	1	Amanda Purdye	Aerodrome Safeguarding	Gatwick Airport Limited		Neutral	<p>Horsted Keynes is outside of our 'physical' 15km safeguarding area. The only concerns we would have with any future development proposals at this distance would be if any wind turbines were to be proposed. We would then request that the airport is notified at the earliest possible opportunity as wind turbines have the potential to interfere with radar and other navigational aids at the airport. Therefore, we have no concerns with regard to aerodrome safeguarding. Thank you for giving us the opportunity to comment on this document.</p>
20356	1	Maureen Prescott	Surrey County Council			Neutral	<p>Thank you for consulting Surrey County Council on the Horsted Keynes Neighbourhood Plan.</p> <p>We have no comments on the plan.</p>

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20393	1	Miss L Bourke	Dowsett Mayhew Planning Partnership		1		Object	<p>Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan</p> <p>Paragraph 184 states the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. It also states neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. Furthermore, it sets out that neighbourhood plans should reflect these policies and plan positively to support them. In addition it states Neighbourhood Plans should not promote less development than set out in the Local Plan or undermine its strategic policies.</p> <p>Against this policy backdrop, the Submission Version HKNP acknowledges, the emerging District Plan sets out a spatial strategy for Parishes and identifies 53 dwellings (as a minimum) is required in Horsted Keynes over the plan period (i.e up to 2031)</p> <p>The HKNP proposes two site allocations for residential dwellings: HK17: Police House Field (for 10 units); and HK18: Land at Jeffreys Farm (for 6 units). The HKNP also includes policy HK1: Built-up Area Boundary. This Policy seeks to support small scale residential development proposals of less than 10 units to meet local need on land adjacent to the built-up area boundary, subject to a number of criteria. The Submission Version HKNP has therefore sought to allocate 30% of the Parish's requirement (i.e 16 units) through site allocations while the remainder is expected to come forward through the application of policy HK1: Built-up Area Boundary.</p> <p>In support of the approach outlined in the HKNP, the "Horsted Keynes</p>

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								<p>Neighbourhood Plan, Housing Justification Paper”, October 2017, considers the spatial strategy of the HKNP and the degree to which it addresses the Objectively Assessed Housing Need (OAHN), as detailed in the emerging District Plan. It specifically considers the reasons why the HKNP does not consider that seeking to meet the OAHN in full represents a sustainable approach. It acknowledges that with the proposed two site allocations for residential dwellings, based on the OAHN there is a shortfall of 37 dwellings. In seeking to address this shortfall it sets out that Policy HK1: Built up area boundary will facilitate higher levels of housing to come forward over the plan period. Notwithstanding this the background Paper acknowledges (para 7.4) that allocating a larger amount of housing in the HKNP would:</p> <p>“clearly provide more certainty that there would be the range of housing to meet the needs of the community and specifically help more younger people to live in Horsted Keynes village”.</p> <p>In light of the above, it is considered the Submission Version HKNP has not been positively prepared to meet the identified need of the Parish. It is accepted there is a shortfall of 37 dwellings. Notwithstanding the Submission Version HKNP intent to facilitate additional dwellings through Policy HK1, it is submitted the HKNP has not positively sought to allocate sufficient land to meet the development needs of the area. The Submission Version HKNP reliance upon Policy HK1 does not guarantee certainty that the Parish will positively meet its housing need over the lifetime of the Plan. The allocation of an additional site(s), as acknowledged in</p>

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								<p>the Housing Paper, would provide certainty that the identified need could be met in the Parish over the lifetime of the plan. It is therefore considered the Submission Version HKNP has not been prepared in accordance with the NPPF paragraph 184 and fails to meet the Basic Condition in this regard.</p> <p>Furthermore it is considered the introduction of Policy HK1 at the Submission Stage presents a material change to the Plan. As this policy was not included at the Pre-submission stage, it is considered that stakeholders have been prejudiced. Stakeholders have not been given the opportunity to comment on the policy and the impact this will have on the development pattern of the Parish. The introduction of such a policy at this late stage is therefore not considered acceptable.</p>

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20393	2	Miss L Bourke	Dowsett Mayhew Planning Partnership		18	Object	<p>The making of the neighbourhood plan contributes to the achievement of sustainable development</p> <p>The Submission Version HKNP proposes to allocate Jeffreys Farm for residential dwellings (HK18: Land at Jeffreys Farm). As set out in the supporting evidence base the site offers a sustainable location for development and its allocation is therefore supported.</p> <p>However, given the extent of the site (0.7 hectares), it is considered the site is capable of facilitating more than 6 units. Both national planning guidance and the emerging policy of the District Plan encourages the effective use of land. It is therefore considered that the allocation for 6 units does not make the best use of the land available. Furthermore given the restrictive size of the allocation proposed, the site falls under the Government's affordable housing threshold and will therefore not contribute towards the affordable housing stock of the Parish.</p> <p>As part of the promotion of Jeffreys Farm through the neighbourhood planning process, additional information in relation to the site and its potential future development was submitted to HKPC in October 2016. At the request of HKPC the availability of Jeffreys Farm was confirmed. In addition, a request was made for the Parish Council to consider, the land which had previously been considered as 3 separate land parcels, to be considered as a single comprehensive allocation (to be known as the "Amalgamated Fields"). It is worth noting, this request had previously been made to the Parish Council when the land parcels were first submitted to the Parish Council in 2014 and at the Regulation 14 Pre-submission stage.</p>

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								<p>Correspondence confirmed that investigations into the feasibility of the “Amalgamated Fields” had been undertaken by the landowner. This comprised additional studies and reports which focussed on highways and transport; ecology; landscape visual impact; and flood risk and surface water drainage.</p> <p>Given the apparent confusion regarding the associated covenant on land parcel HKNP017, clarification was provided on the extent of land to which the covenant is associated. It was also confirmed that the covenant does not prohibit the use of the land for access purposes to the wider Jeffreys land holdings. For clarity, the covenant states:</p> <p>“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 XYZ”.</p> <p>The existence of the covenant on land parcel HKNP017 should therefore not have been considered as a reason to prohibit the allocation of the “Amalgamated Fields”.</p> <p>Following an independent review by Lindsey Frost1, the findings of the report, which included a number of recommendations, were presented at an extraordinary meeting of the Parish Council in August 2016. In response to recommendations, Troy Navigus were separately commissioned to: review the Pre-submission representations; and to review the site information put forward during the Pre-submission consultation and to review the existing site allocations proposed in the draft Plan. This work was undertaken and assisted by:</p>

- Further information submitted by site promoters;
- Engagement with the High Weald AONB (Area of Outstanding Natural Beauty) Unit;
- Engagement with MSDC on the overall housing strategy and numbers and new information submitted by site promoters; and
- Engagement with West Sussex County Council (WSCC), Highways Department on the the new information submitted by site promoters.

With respect to Troy Navigus’s engagement with the High Weald AONB in relation to the “Amalgamated Fields”, the High Weald AONB confirmed 2 the field is classified as “late 19th century irregular piecemeal enclosure”. The “Amalgamated Fields” is therefore not medieval or earlier and should not be precluded for allocation on these grounds.

Troy Navigus also discussed the “Amalgamated Fields” option and its accompanying Highways and Transport Study with West Sussex Highways Department. The meeting note³ confirms a single point of access for the “Amalgamated Fields” could work. It also notes visibility is restricted and advised the cumulative effect of the sites would require a review of the pedestrian network. No objection to the “Amalgamated Fields” was therefore raised on highways grounds.

In addition to the above engagement, Troy Navigus assessed the “Amalgamated Fields” option which was presented to HKPC in October 2016. The “Amalgamated Fields” were assessed against the same sustainability criteria as previously used, with the addition of an assessment criteria relating to the impact on intact medieval field patterns. This established that the site was

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								<p>“a sustainable option for an allocation of 42 dwellings and would provide wider community benefits through the provision of open space and potentially a sports pavilion”.</p> <p>In light of the revised and updated evidence base, the “Amalgamated Fields” was therefore considered a sustainable option which could deliver 42 dwellings. Notwithstanding the findings of Troy Navigus, the Parish Council, disregarded the independent and professional advice of their consultant and did not consider the site further for allocation.</p> <p>It is therefore considered that the Submission HKNP does not meet the Basic Conditions as it failed to consider the inclusion of a sustainable site to meet an identified housing shortfall. The making of the neighbourhood plan without the allocation of the “Amalgamated Fields” does therefore not contribute to the achievement of sustainable development.</p>
20393	3	Miss L Bourke	Dowsett Mayhew Planning Partnership				Object	<p>The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)</p> <p>As set out above, the examination of the District Plan is ongoing. An additional Hearing session is scheduled to take place in February 2018. Should the District Plan be adopted prior to the Examination of the HKNP, the HKNP will be examined against the strategic policies of the District Plan. In this instance, and as set out above, the HKNP is not proposing sufficient housing to meet the identified need as set out in the emerging District Plan. It is therefore considered that the HKNP is not in “general conformity” with the emerging higher tier policies of the District Plan.</p>

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20393	4	Miss L Bourke	Dowsett Mayhew Planning Partnership			Object	<p>The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations</p> <p>It is acknowledged that there is no legal requirement for a neighbourhood plan to have a sustainability appraisal (SA). However as set out in planning guidance a qualifying body must demonstrate how its plan will contribute to achieving sustainable development. Guidance notes a SA may be a useful approach for doing this.</p> <p>The Submission Plan is accompanied by a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment. The SA includes an assessment of neighbourhood plan policies and an assessment of sites. Para 8.7 of the SA confirms 25 sites were put forward for consideration as housing sites. Of those sites submitted, 12 were assessed as being unavailable, undeliverable, unsustainable and too small to justify allocation. In light of this, 13 sites, a map of which is included in Appendix D, were assessed. Sites comprised:</p> <ul style="list-style-type: none"> • HKNP001 Land at end of Church Lane • HKNP002 Police House Field • HKNP003 Constance Wood and Council Field • HKNP005 Land at Little Keynes, Birchgrove Road • HKNP006 Land beside Ludwell Grange • HKNP008 Land to the west of Church Lane • HKNP012 The Old Rectory • HKNP013 Jeffreys Farm Buildings • HKNP014 Land north of farm buildings (A) • HKNP015 Land north of farm buildings (B) • HKNP016 Sugar Lane Field • HKNP025 Land behind St Stephens Church • HKNP028 Land at Westall House <p>The “Amalgamated Fields” has therefore not been assessed as part of the</p>

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								<p>Submission SA.</p> <p>National Planning Practice Guidance confirms plan-makers should assess the policies in a draft Local Plan, and the reasonable alternatives, to identify the likely significant effects of the available options. It clarifies that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. It notes the alternatives must be realistic and deliverable. Furthermore it states reasonable alternatives must be considered and assessed in the same level of detail as the preferred approach intended to be taken forward in the neighbourhood plan.</p> <p>Guidance confirms the strategic environmental assessment should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.</p> <p>Troy Navigus, as part of the review of the evidence base, assessed the “Amalgamated Fields” against the sustainability criteria previously used with the addition of an assessment criterion relating to the impact on medieval field patterns. This assessment established that the site was a “sustainable option for an allocation of 42 dwellings and would provide wider community benefits through the provision of open space and potentially a sports pavilion. It would also go a considerable way towards addressing the shortfall in OAN. This must therefore represent a significant new alternative, with the Henfield case flagging the importance of fully exploring such alternatives”</p>

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								<p>The evidence base which supports the Submission Version HKNP acknowledges that the “Amalgamated Fields” offers an alternative option to the Parish Council. As set above, Government guidance requires reasonable alternatives to be assessed as part of the plan making process. Contrary to Government guidance, the Submission Version HKNP SA does not acknowledge an alternative option was presented to the Parish Council. The SA therefore fails to assess the alternative option presented and does not set out the reasons why the alternative option was not taken forward. It is therefore submitted that the Submission Version HKNP breaches, and is not compatible with, EU obligations.</p>

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20393	5	Miss L Bourke	Dowsett Mayhew Planning Partnership				Object	<p>Summary</p> <p>Representations are made on behalf of the landowners of Jeffreys farm in response to the Submission Version HKNP and associated submission documents.</p> <p>Given the stage of the preparation of the plan, representations have focussed on whether it is considered the Plan meets the requirements of the Basic Conditions.</p> <p>The Submission Version HKNP proposes to allocate Jeffreys Farm through Policy HK18: Land at Jeffreys Farm. The proposed allocation is supported in principle however it is consider the site is capable of facilitating additional residential dwellings above the identified 6 dwellings.</p> <p>Notwithstanding the support for the proposed allocation, it is submitted that the Submission Version HKNP does not meet the requirements of the Basic Conditions. It is submitted the Plan:</p> <ul style="list-style-type: none"> • Fails to have regard to national policies and advice contained in guidance issued by the Secretary of State. The Submission Version HKNP has not been positively prepared and does not allocate sufficient housing to meet the identified needs of the Parish. • Fails to contribute to the achievement of sustainable development. The Submission Version HKNP does not propose to allocate the “Amalgamated Fields”, which was identified as a sustainable option. The Submission Version HKNP therefore does not contribute to the achievement of sustainable development. • Is not in general conformity with the strategic policies of the emerging District Plan as the Submission Version HKNP is not proposing sufficient housing to meet the identified need

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							<p>as set out in the emerging District Plan.</p> <ul style="list-style-type: none"> • Breaches and is not compatible with, EU obligations. The Submission Version HKNP SA, does not include an appraisal of the “Amalgamated Fields” which was considered an alternative by Troy Navigus. <p>In light of the above, it is respectfully submitted that the Submission Version HKNP should not proceed to Examination. It is submitted that HKPC revert to the Pre-submission stage and reconsult on a revised Plan which includes the “Amalgamated Fields” in order to address the identified shortfall in the OAN</p>
20516	1	Ms Charlotte Mayall	Southern Water			Neutral	<p>Thank you for your email below inviting Southern Water to comment on the Submission version of the Horsted Keynes Neighbourhood Plan. We are pleased to note that our comments have been considered, and have no further representations on this occasion.</p> <p>We look forward to being kept informed of the plan's progress.</p>
20790	1	Mr H Asson	Rapleys			Object	<p>Rapleys LLP act on behalf of Horsted Keynes LLP and have been instructed to submit a representation regarding the submission of the Horsted Keynes Neighbourhood Plan (the ‘Plan’). This letter sets out the guiding principles for neighbourhood planning before providing an assessment of the Plan. It is our view that in its current form the Plan is unacceptable for examination and should be returned to the Parish Council for revision.</p> <p>As the Local Planning Authority tasked with giving support to the Parish Council, we believe Mid Sussex District Council (MSDC) should decline to submit the plan for examination as it clearly fails to meet the basic conditions to which it must be measured. It has not prepared positively for growth, it does not contribute to sustainable development, it is not in general conformity with either national or local policy, and it has not been prepared in an open and democratic manner that has involved and attended to the desires of the whole community.</p>

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20790	2	Mr H Asson	Rapleys		1	Object	<p>This policy was added after the Regulation 14 consultation, has not been subject to public scrutiny. Further, HKPC declined to publish the policy at the earliest opportunity despite urgent requests to do so. This goes against Section 41, paragraphs 49 and 47 of the PPG. HKPC stated that there would be an extraordinary meeting to discuss the inclusion of this policy, but this did not take place. The PPG states that policies should not be consulted on individually: such a meeting would have been insufficient even if it had taken place. The inclusion of the policy represents a material change to the Plan, and it should consequentially undergo an additional Regulation 14 consultation. This concern has been put to the Council by parishioners on multiple occasions, but to no effect.</p> <p>The policy ostensibly encourages windfall residential development and, as stated in the Housing Justification Paper, is relied upon in order to meet the village's OAN. However, as outlined in the Housing Justification Paper, HKPC considers that a large proportion of the land adjacent to the settlement boundary is unsuitable for development. This is owing to considerations of heritage and the natural environment. If HKPC wish to encourage development adjacent to the settlement boundary, they should assess and allocate land in the most sustainable sites, where any impacts may be minimised and contained.</p>
20790	3	Mr H Asson	Rapleys		2	Object	<p>The requirement that developments over five dwellings provide both market and affordable units goes against the adopted local plan (a threshold of 15, national policy sets a standard threshold is 10, the emerging local plan sets a threshold of 11 and notes that a commuted payment can be made for proposals of 6-10 units in the AONB. There is nothing to ensure this money will be spent to provide affordable units in the neighbourhood.</p> <p>This is the only policy that mentions affordable housing, and does not provide reassurance that the Plan will address one of the village's primary areas of concern – as evidenced by responses to the Regulation 14 consultation.</p>

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20790	4	Mr H Asson	Rapleys				Object	<p>As stated in the Housing Justification Paper, HKPC have budgeted for a windfall allowance of 2dpa. This has been used to supplement identified sites in an attempt to meet the housing target.</p> <p>As noted above, MSDC's emerging housing policy DP5 includes a windfall allowance of 450 units across the district, providing for an average delivery of 45 units in the final decade of the plan period. The housing target that has been given to Horsted Keynes (along with all other settlement targets) stand outside of, and in addition to, this windfall. It is inappropriate for HKPC to include their own windfall in the supply, as this has already been counted separately within the Mid Sussex's figures; future allocations through Neighbourhood Plans is clearly listed separately within the Table 1 of this letter, which is taken from policy DP5 directly. HKPC should find land to meet to entirety of their target, and may not rely upon windfall in order to do so.</p> <p>Aside from its failure to stand in general conformity with local policy, the reliance on windfall also makes it likely that the sites that could be provided through such development will fall under the affordable housing threshold (the increased supply of which is a noted local concern). Any reliance on small windfall schemes will negatively impact the delivery of affordable housing. The allocation of larger sites will help the Parish to increase their affordable housing stock, and larger developments should be supported in the same vein.</p>

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20790	5	Mr H Asson	Rapleys				Object	<p>Comment on the Plan making process:</p> <ul style="list-style-type: none"> ☐ The council have included policies in the submission plan which have not been consulted on; ☐ An extraordinary meeting in order to discuss the Plan prior to its submission was promised, but none took place; ☐ The council's assertion that further housing would overwhelm the local school has been refuted by the school, who have said that further housing is necessary in order to ensure the school's future; ☐ There have been persistent concerns with the council's consideration of the entire community (this concern was raised at almost every Parish Council meeting in 2017); ☐ The housing paper includes out-of-date and misleading information. The Council have acknowledged this but have declined to change it; and ☐ Concerns have been raised repeatedly regarding the likelihood of the permission at Ravenswood being implemented – these have been dismissed by HKPC.

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20790	6	Mr H Asson	Rapleys				Object	<p>Regard to National Policies and Sustainable Development</p> <p>The NPPF puts forward a vision of positive, sustainable development that helps to enable the strong future growth an area, and states that the presumption in favour of sustainable development should be a golden thread that runs through the plan making process. This requires local planning authorities to meet the needs of the community with sufficient flexibility to adapt to rapid change, and positively seek opportunities in which to do so. HKPC have not fulfilled this requirement, and the policies contained within the Plan are, at their core, anti-development, and seek to exert greater negative control over development that that prescribed by the NPPF. The plan does not meet the basic conditions of conformity with national guidance, nor the contribution towards sustainable development.</p> <p>Strategic Policies of the Development Plan</p> <p>The adopted (although out-of-date) Local Plan sets targets on affordable housing to which Horsted Keynes' Plan is in contradiction. It also conflicts with the emerging policy on affordable housing, and seeks to challenge the housing target that has been set by MSDC, a target for which the District Plan's Inspector has expressed approval. This is further exacerbated by the inclusion of committed housing into the supply that is unlikely to be delivered. The Plan is not in general conformity with the development plan for the area, and fails to meet the condition.</p>

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20790	7	Mr H Asson	Rapleys			Object	<p>CONCLUSION</p> <p>Before the Plan is submitted to an examiner, MDSC should form a provisional view on whether it meets the required basic conditions. If it clearly fails in this the plan should not be submitted and instead returned to the parish for review. In its current state, the draft Horsted Keynes Neighbourhood Plan should not be considered acceptable to proceed to examination. There are many areas of concern, among which are observations that the Plan:</p> <ul style="list-style-type: none"> ☒ is not in general conformity with national and local policy; ☒ has not planned positively for future growth and inappropriately relies on windfall housing which is separately categorised in the emerging Local Plan; ☒ does not contribute to the achievement of sustainable development; ☒ does not meet the required basic conditions; ☒ should undergo an additional Regulation 14 consultation to address the material changes that have been made to the plan in the interim; ☒ provides for substantially less housing than the target set by the District Plan; ☒ does not address local concerns, despite the fact that these have been put to HKPC repeatedly; and ☒ is unlikely to be approved at referendum owing to considerable local opposition, as stated both by independent consultants and members of the parish. <p>These are considerable shortcomings, and we are strongly of the view that the Plan is returned to the Parish in advance of any submission being made to an examiner.</p> <p>If MSDC are of the view that it may be submitted for examination, it is essential that there is a public hearing to address in full the issues this letter has raised.</p>

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21942	1	Ms A Smith				Object	<p>I am writing in respect of the above, particularly Section 9 in relation to site allocations for proposed housing developments.</p> <p>As a resident of Horsted Keynes, I am very disappointed that the plan does not focus more on providing affordable housing for local young people. It is crucial that our village offers housing that enables it to be a sustainable community. The best way to do this is to encourage young families to live here as they will use our facilities such as the local shop and school.</p> <p>I feel that the plan focuses too much on the elderly, particularly in relation to building accommodation for a private, with profit, residential home.</p> <p>The number of dwellings proposed on the other two sites indicates that these will be large, unaffordable housing that will not support the development of the village.</p> <p>At no point, in Section 9, is there mention of affordable housing or right to buy or housing for local people. I feel this is a serious omission and all proposals for planning approval should involve a reasonable percentage of housing that is affordable for young, local people. In Section 2.15, the plan acknowledges that the population of Horsted Keynes is ageing. The plan states, 'The proportion employed in financial, real estate, communication and IT services – strong growth sectors nationally - is comparatively high. By contrast, the proportion employed in traditionally lower paying sectors such as retail is low.' which the plan points to being indicative of how the village has a 'the high proportion of highly educated people' although I would argue it shows how the village is being overrun by highly paid commuters who do not use the local school (preferring private education) nor use the village store as they work in towns and cities. It also goes on to explain how 'Horsted Keynes is dominated by detached housing, representing nearly 50% of its housing stock' which again shows how it is currently an unaffordable place to live for young people and young families. However, it does point out that the North West Sussex Strategic Housing Market Assessment (SHMA) Update2 was published in 2014, 'highlighted that affordability is a significant issue with over 44% of households in Mid Sussex District unable to rent or buy a property without assistance.....' and 'in Horsted Keynes parish, the picture is even starker. ' I therefore find it very hard to understand why affordable housing for local people is not the priority for this plan and the idea that agreeing for</p>

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								<p>more accommodation to be built at the 'for profit' residential care home will result in freeing up existing family accommodation in the village ludicrous on two points. Firstly, there is no commitment for the home to fill these new properties with local residents and secondly, should someone from the village sell their house to enable them to move into this sheltered accommodation, the cost of the home will mean it is not affordable for local young families.</p> <p>To retain the rural village character, ensure the facilities are sustainable and the community continues to be vibrant it is crucial that housing is built that is affordable for young people and families who will work locally and use the village shop, school and pubs. The only way this can be done is if planning approval makes this a requirement of any development and that this is supported by the Government, county council, district council and parish council.</p> <p>It is also important that the correct sites are chosen for development, not ones that impact negatively on the village (such as the recently submitted application for houses on 'the sledging field' with access from the narrow Church Lane which is the only access for the school and church)</p>

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21943	1	Mr T Higham					Object	<p>I write in support of the letter sent to you by Mr. Peter Whatling dated 8 January 2018.</p> <p>As a former member of the Horsted Keynes Neighbourhood Plan (HKNP) Steering Group I can confirm that he has correctly identified issues of concern in our parish and accurately described the failures of the consultation process conducted after the removal of volunteer members of the Steering Group in July 2015. I wish to underline some key points under the two headings in Mr. Whatling's letter.</p> <p>Basic Conditions</p> <p>The evidence cited in MSDC's draft district plan of a gradual reduction in average household occupancy rates means that the 16 new homes proposed will provide zero population growth in our village. In other words, by 2031, we will need this number of new homes just to accommodate the current size of HK's population. The only growth possible will come from random in-fills, and this is not a factor upon which the HKNP can rely to remedy the situation.</p> <p>Moreover, the HKNP envisages just 6 new homes on a 0.77 ha. Plot (Jeffreys Farm) that could accommodate 22 under MSDC's criterion for rural sites of 30 per ha. The only economic use of such a parcel of land under HKNP's proposal would be to build 4-5 bed homes, the last thing a village with an existing surfeit of such homes needs. But this would breach the HKNP's policy on site usage, leaving the owners little option but to withdraw the land.</p> <p>I must add that the 10 homes proposed for the Police House site on Birch Grove Road contrasts with Navigus' original recommendation of 7 homes for what is of course a gateway development. This site's actual size also needs to be verified.</p> <p>National guidelines require local authorities to provide affordable housing. It is a great disappointment to very many in the village that the HKNP pays lip service to this aspiration, one that was clearly articulated in the 2009 Village Plan and confirmed in NP consultations. The HKNP offers nothing at all to make this much needed provision.</p> <p>Consultation</p>

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								<p>The last Steering Group (SG) meeting open to the public was in November 2015. Since then, the only opportunities for resident feedback have been in the context of PC meetings which have allowed residents to make points but prevented discussion between councillors and public on issues raised. Attendance at PC meetings have been dominated by supporters of the Sugar Lane lobby group opposed to Jeffreys Farm development, which has included two councillors with conflicts of interest referred to in Mr. Whatling's letter, Vince and Kirk.</p> <p>The worst aspect of the 2015 workshop consultation was the consistent distortion of information given to residents about Jeffereys Farm land by the four-person SG, two of whom had Jeffreys Farm conflicts of interest. They suppressed both the fact that the covenanted site in no way impeded access to adjoining sites and West Sussex Highways positive advice on where such access could be provided. Worse still, they reviewed returned questionnaire forms from the workshops and advised the PC that a majority were against including Jeffreys green field sites. But when two former SG members separately audited the forms and advised the PC that this wasn't true, the PC took no action to independently review the forms to ensure that neither they nor residents were being misled, a serious breach of their duty to residents that has invalidated the HKNP process ever since.</p> <p>The change of direction in the plan process following the new PC's election in May 2015 has been enforced regardless of widespread opposition recorded during the first formal consultation phase in the spring of 2016 and Troy Navigus' recommendation in the autumn of 2016 that the plan put forward by the Jeffreys Farm land owners (which included provision of 13 affordable homes) should be included in the HKNP to bridge the OAN shortfall.</p> <p>Perhaps the most significant contribution to the Spring 2016 consultation process came from the governors of the village school, St Giles Church of England Primary School. This explained why it was vital for the school's future that suitable housing provision be made in the plan for young families. The PC have simply brushed this aside, together with the worrying development of a falling school roll - 104 this years, 111 last year, 120 the previous year.</p> <p>In summary, on the basis of a deeply flawed consultation process, the HKNP</p>

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proposed by the Parish Council provides for no growth in population size over the plan period and no affordable housing, thereby accentuating the ageing problem highlighted as long ago as the 2009 Village Plan. The outcome would predictably be a shrinkage of our population as a proportion of the district's population and increasing difficulty for the highly valued village school and pre-school groups and other community facilities.

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21944	1	Mr P Whatling					Object	<p>I have reviewed the documentation submitted in December 2017 by Horsted Keynes Parish Council in respect of their proposed Neighbourhood Plan and wish to make representations in two particular areas:</p> <ol style="list-style-type: none"> 1. I do not consider that the plan meets the basic conditions and 2. I do not consider that the Consultation Document provides a full and accurate account of the consultation process, both by exaggerating the scope of community consultation actually undertaken and by failing to give proper account to the full range of views and representations received. <p>Basic Conditions</p> <p>With regard to whether the plan meets the basic conditions for Neighbourhood Plans I note the following in relation to the requirements of the NPPF:</p> <ol style="list-style-type: none"> 1. The plan fails to support a prosperous rural economy. It effectively prevents the scale of development necessary to enable the increase in population required to promote local services and community facilities such as the school, shop, public houses, bus service etc. 2. The plan fails to deliver a wide choice of high quality homes. The sites allocated within the plan provide a total of 16 dwellings on 2 sites, a total increase of around 2.5%. Policy HK1 permits further developments of less than 10 dwellings but there is no evidence that any such sites will become available within the plan period so these cannot be relied on to provide significant additional housing. The plan does not therefore offer a realistic prospect of significantly boosting the supply of smaller, less expensive family homes or provide any affordable homes, both of which have been clearly identified as critical village needs. 3. The plan fails to identify sufficient specific development sites despite several having been

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								<p>offered by local landowners which were available for development, assessed as sustainable in accordance with normal planning guidelines and which could make a significant contribution to meeting the village's housing needs.</p> <p>4. The plan does not conform to the requirements set out in the emerging District Plan for meeting the OAN for the village.</p>
21944	2	Mr P Whatling					Object	<p>I refer to the submitted Consultation Document which I believe gives a misleading view of the extent of consultation which has taken place. Since July 2015 when the Parish Council effectively took over the Steering Group and prevented parishioners who were not elected councillors from sitting on it, the scope of consultation with the community has been minimal. With the exception of the Workshop event in September 2015 there have been no community events at which plan proposals have been presented for information or discussion; written submissions to the Parish Council have not been responded to and requests for meetings to discuss matters raised have been refused.</p> <p>Particular matters within the document which should be noted are as follows:</p>
21944	3	Mr P Whatling					Object	<p>Paragraph 1.4 sets out the organisational structure of the Steering Group. It should be noted that from January 2016 when Councillor Colville resigned from the group, it comprised three members, Councillors Kirk, Vince and Webster. Of these Councillors Kirk and Vince had acknowledged conflicts of interest in respect of certain sites which had been offered for allocation, included within the initial plan proposals and then subsequently omitted after they took over the development of the plan.</p>

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21944	4	Mr P Whatling				Object	Paragraph 1.11 suggests that “a large proportion of the community were engaging in the process”. This was true until September 2015, but following the Workshop event there has been almost no opportunity for the community to engage in the process.
21944	5	Mr P Whatling				Object	Paragraphs 2.8 and 2.9 describe a critical change to Objective 3 in which the reference to increasing the village population was removed. Paragraph 2.9 suggests that this was a result of comments received. There is no evidence to support that this issue was ever properly put to the community and support for the change received.
21944	6	Mr P Whatling				Object	Paragraph 2.22 relates to a restrictive covenant on Site 017. Although it is true that the covenant did prevent the erection of houses on the site it does not prevent the use of the site to provide access to adjacent sites. This became an important matter in the September Workshop event at which misleading information was provided to the public as to the availability of this access and therefore the viability of the adjacent sites.
21944	7	Mr P Whatling				Object	Paragraph 2.25 mentions the covenant on Site 017 but again without mention of the ability of using this site to provide access to the others. It also mentions WSCC Highways advice but fails to state that the advice suggested that access should be via Site 017, and made no mention of a footpath along Sugar Lane, indicating only that a footpath connection would be needed to Lewes Road which was never at issue.

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21944	8	Mr P Whatling				Object	Paragraph 2.26 suggests that community was against the development of the remainder of the sites since this would result in a “large estate”. However, the records of the responses to all the relevant community consultation on these sites indicates considerable support for development at this location and what constituted a “large estate” was never consulted upon.
21944	9	Mr P Whatling				Object	Paragraph 2.27 relates again to WSCC advice on using the existing access. WSCC report on the matter actually stated “Suggest moving access northwards to between existing mature trees to reduce impact on vegetation and allow full visibility splays ..”, i.e. to move the access onto Site 017, clearly this was a “demonstrably more feasible and safer solution”. The use of these issues as justification for re-classifying the sites as unsustainable and removing them from consideration was clearly incorrect and has a significant effect on the integrity of the submitted plan.
21944	10	Mr P Whatling				Object	Paragraphs 2.30 to 2.38 discuss the September 2017 Workshops. The Workshop was conducted with reference to a booklet prepared by the Steering Group which included the Jeffreys Farm sites as “Sites no longer under consideration” and participants were invited to indicate in a questionnaire whether they agreed with this exclusion. The results show that a significant majority of those responding stated that they did not agree and that the sites should continue to be considered. No mention is made in these paragraphs of this result. The views of the community have not been properly taken into account in developing the plan.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21944	11	Mr P Whatling				Object	<p>Paragraphs 2.39 to 2.43 discuss the Parish Council meeting in December 2015. Paragraph 2.43 notes that no further monthly SG meetings were held from this date. These had been formal public meetings, with published minutes, devoted entirely to NP matters, at which the community had had a reasonable opportunity to ask questions and make comments on the ongoing plan development process. From that date all further work on the plan was conducted in private, without any community consultation other than the formal issue of the Pre-Submission Consultation draft.</p>
21944	12	Mr P Whatling				Object	<p>Paragraphs 4.5 to 4.9 discuss the work of the PC's consultant Troy Navigus Partnership, which has been advising on the preparation of the NP since 2014 and undertook the original sustainability assessments. They undertook a review of the responses to the Pre-Submission Consultation and other issues arising and concluded, inter alia, that the Jeffreys Farm site was "... a sustainable option for an allocation of 42 dwellings and would provide wider community benefits". Clearly this contradicts the basis on which the sites were excluded from the September workshop and undermines the conclusions drawn from that event. In refusing to accept the Troy Navigus recommendations to allocate the Jeffreys Farm sites which would have necessitated the re-running of the Regulation 14 Consultation, the PC has failed in its obligation properly to consult.</p>

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21944	13	Mr P Whatling				Object	<p>I consider that the preparation of the Neighbourhood Plan by Horsted Keynes Parish Council has not been undertaken in a sufficiently open, transparent and inclusive manner, or with sufficient community engagement. It does not comply with the basic conditions and as a result of the lack of consultation it cannot be said to represent the views and aspirations of the community. I submit therefore that it should not be approved.</p>
21947	1	Mr R Franklin	Highways England			Neutral	<p>Having reviewed the Horsted Keynes Neighbourhood Plan - Regulation 16 Consultation, we note that the emerging Mid Sussex District Plan 2014-2031 identifies that Horsted Keynes should deliver 53 dwellings (as at 1st April 2017 after completions), but that it has been advised that this number is likely to change on an annual basis depending on the level of housing delivery across the District.</p> <p>We also note that the Neighbourhood Plan identifies three sites for development as follows:</p> <ul style="list-style-type: none"> o Police House Field (10 dwellings); o Land at Jeffreys Farm (6 dwellings); and o Land at Westall Hall (8 dwellings), which is classed as a C2 use, and therefore does not contribute towards overall housing requirements. <p>Therefore, there could be a potential need for further sites to be allocated to meet the District Plan allocation.</p> <p>Accordingly, Highways England does not offer any comments at present on the Horsted Keynes Neighbourhood Plan - Regulation 16 Consultation. However, if further sites are identified towards the District Plan allocation, Highways England requests that it is kept informed for consideration of whether there would be a cumulative impact on the Strategic Road Network</p>

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Page	Type	Comments
21948	1	Mr A Byrne	Historic England				Neutral	<p>The area covered by your Neighbourhood Plan includes the Horsted Keynes and Birch Grove Conservation Areas, and a number of important designated heritage assets including 54 Listed Buildings; most notably the Grade I Parish Church of St Giles and the Grade II* Broadhurst Manor. In line with National Planning Policy Framework (Paragraph 126), it will be important that a positive strategy is included in the plan for this area that conserve those elements which contribute to the significance of the historic environment and those heritage assets that contribute to its character so that they can be enjoyed by present and future generations.</p> <p>Historic England supports in general terms the aims and objectives of the draft NDP in relation to the heritage of the parish, and we have the following detailed comments to make regarding your plan that we hope will strengthen it in this regard.</p>
21948	2	Mr A Byrne	Historic England				Neutral	<p>In Neighbourhood Plan Objectives, para 3.3 add 'historic environment' into bullet 1 to recognise the significance of the heritage of the village to its distinctiveness and special character;</p>
21948	3	Mr A Byrne	Historic England		1		Neutral	<p>Policy HK1: Built-up Area Boundary – in view of the designation of much of the village as a conservation area and the location of a number of listed buildings within the village BUAB and in the wider countryside, this policy should include reference to conserving and enhancing the historic environment and heritage assets;</p>

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21948	4	Mr A Byrne	Historic England			3	Neutral	While we broadly support the intentions of Policies HK3 and HK4 we suggest some changes to the wording to ensure that the plan is in conformity with the NPPF - in Policy HK3, penultimate sentence revise to 'Development should seek to conserve or enhance the setting of any heritage asset and avoid harm to its significance';
21948	5	Mr A Byrne	Historic England			4	Neutral	and, in Policy HK4, in the sentence relating to the Horsted Keynes Conservation Area replace 'demonstrate it is sensitive to its character' with 'preserve or enhance its character and appearance';
21948	6	Mr A Byrne	Historic England			6	Neutral	Policy HK 6: High Weald AONB may benefit form the addition of 'and the historic environment' after natural beauty in the second line;
21948	7	Mr A Byrne	Historic England			17	Neutral	Site Allocations - Policy HK17: Police House Field; this site is adjacent to the Grade II listed Lucas Farmhouse and, notwithstanding the policies above regarding impact on heritage in general, this policy should include reference to the requirement to avoid harm to the setting of the heritage asset.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21948	8	Mr A Byrne	Historic England			Neutral	<p>If you have not already done so, we would recommend that you speak to the planning team and historic buildings conservation officer at Mid-Sussex Council together with the staff at West Sussex County Council's archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk).</p> <p>Historic England has produced set out advice on its website to help parishes and forums to consider the historic environment in the preparation of their neighbourhood plans. Additionally, you may find the advice note on Historic Environment and Neighbourhood Plans helpful to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. This can be found at: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p> <p>You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by English Heritage, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from: http://content.historicengland.org.uk/content/docs/planning/neighbourhood-planninginformation-</p>

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								aug14.pdf. (Please note this document is currently being updated and a link to the revised consultation version is included in the above webpage).
21949	1	Ms H Griffiths					Object	<p>I believe the Horsted Keynes neighbourhood plan does not meet the basic conditions of a Neighbourhood Plan, and definitely does not meet the requirements of the village. I request that the inspector does not allow the plan to pass to referendum.</p> <p>Most notably is the lack of housing, and especially affordable housing being allocated in this plan. The plan notes the 'Need for small properties', 'and 1 or 2 bed affordable housing' in Horsted Keynes, and that there are a 'limited number of local services and facilities, some of which are under threat', and that the plan objectives are to 'addresses the needs of younger people and families'. This plan only allocates 16 units, yet Mid Sussex has 53 houses in its OAN by 2031.</p> <p>The responses from the Regulation 14 consultation had over 50% of responses from parishioners expressing concern that there needed to be more provision of affordable housing. This concern has not been addressed by the current plan, and no attempt has been made to include allocations that will bring this type of housing forward. The plan does not conform to MSDC District Plan policy DP29 for affordable housing, as a development under 10 units does not need to provide affordable housing as per MSDC own policies.</p> <p>The Parish Council submitting this plan have not undertaken a comprehensive up to date strategic housing needs assessment, and as a result to not fully understand the needs of the village. This would go a long way to address the questions over number of houses needed in the plan period, which is often disputed, both positively and negatively in the parish. It would also address the issue of how many affordable houses are really needed for local residents. There is local support for housing on some of the proposed sites (especially Jeffrey's farm amalgamated sites) but this has not been properly considered.</p>

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21949	2	Ms H Griffiths			1	Object	I believe the inclusion of Policy HK1 (housing adjacent to the built-up area boundary) has not been properly reviewed in a consultation by the parish, as it was included after the Regulation 14 consultation. The plan states that only 'minor amendments' have been made following the Regulation 14 consultation, but given this policy is to provide the shortfall of over 35 units it is not a minor addition. This policy will have wide ranging and dramatic impact for the village on all sides, and the parish should be consulted before its inclusion. In addition, this policy does not protect the conservation area of Church Lane, and also does not provide any affordable housing, so does not conform to the objectives of the NP.
21949	3	Ms H Griffiths				Object	The plan states that landowners have been included in discussions about achievability. As a landowner myself I have never had a conversation with the NPSG regarding achievability. As a result, I believe the allocations in Policies HK17 & 18 & 19 are flawed.
21949	4	Ms H Griffiths			18	Object	Policy HK18 contains inaccuracies. Section 9.15 says 'Access would be along the farm track off Sugar Lane which is only suitable for relatively limited numbers of vehicle movements'. This statement is incorrect as alternative access has been suggested by the landowner but not considered by the NPSG. Section 9.16 says 'The site is visible on the landscape from the west'. These views are distant views (over 2km through several mature hedge lines). Again, this has been advised of the NPSG, with no action taken to amend the documents. Section 9.7 suggest the need for a 'courtyard style' development. This has not been discussed with the landowners and is considered an unnecessary constraint given the existing farm buildings layout. The allocation of only 6 houses on a site of this size is not good use of land and will promote the building of larger houses to make it viable. The allocation of more houses should have been considered for the plan to meet its objectives of providing smaller and affordable homes. This is an option that has not been considered, yet is sustainable.
21949	5	Ms H Griffiths			19	Object	Policy HK 19, considering the allocation of the Westall site, should not be included, given its C2 status. Its development is already in the plan under business sites HK11.

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21949	6	Ms H Griffiths					Object	Section 1.2 of the plan suggest that the 'The Plan has been prepared by the community through the Horsted Keynes Neighbourhood Plan Steering Group (NPSG)'. The Neighbourhood plan consultation statement highlights the issues that have been faced by the multiple changes in members of the NPSG, especially between May 2015 when a 'new' parish council was voted in, and parishioners were removed from the NPSG. This document fails to mention that three of the NPSG post May 2015 had to have special dispensation to work the plan, as they lived adjacent to two sites being proposed: notably The Old Rectory site, and the Jeffreys Farm sites. This has had major implications for the manipulated assessment of these two sites.
21949	7	Ms H Griffiths					Object	Continuing on from this point the public 'monthly meetings of the steering group' (section 1.13) were not continued following a well-attended contentious meeting in November 2015. Since that point I do not believe the village as a whole have been involved with the process of compiling the NP, and the variety and spread of views have been ignored.
21949	8	Ms H Griffiths					Object	Regarding the comment that 'opportunities were offered to landowners putting forward parcels of land for housing or other development to discuss the ways in which their proposals would contribute to the Plan objectives' (Section 1.14). Little in the way of discussions were held to discuss allocation numbers with landowners, and Jeffreys Farm site was told 'you either accept 6 houses or we do not allocate the site at all'.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21949	9	Ms H Griffiths				Object	<p>This plan has not been compiled with a positive mindset of ‘finding a solution’ to the much-needed housing issues in Horsted Keynes. It has been compiled by a group of councillors (NPSG), who have been openly against housing in the village, and unfortunately, they have misrepresented data on many occasions regarding particular sites. This plan is being put forward with little if any communication with landowners. When issues were found with sites they have been dismissed rather than working with landowners to find solutions. The allocations proposed do not meet Horsted Keynes’s housing needs for affordable housing. It has become a plan purely about housing, not about the sustainability of a rural community.</p> <p>As an external examiner, I urge you to review the Regulation 14 consultation responses in person. In addition to read the consultant reports from Lindsey Frost (section 4.3 Horsted Keynes Neighbourhood Plan Consultation Statement), and the Troy Navigus report (Section 4.8 Horsted Keynes Neighbourhood Plan Consultation Statement), who recommend the HKPC to allocate more housing than is currently planned. I would respectfully request that the plan as it stands does not pass to the referendum stage of the process.</p>
21949	10	Ms H Griffiths				Object	2.23 ‘Existing access has limited visibility and limited scope to improve it without purchasing additional land’. Additional land would not need to be purchased as this already belongs to the same landowner (and always has).
21949	11	Ms H Griffiths				Object	2.27 ‘Informal officer advice by WSCC Highways stated that the existing access point had limited visibility and limited scope to improve it. Provision of an alternative access point to the north was not considered to represent a demonstrably more feasible or safer solution’. At no point was the landowner approached to seek alternatives. In October 2016 an alternative option was suggested as part of a planning application, and was not objected to by WSCC traffic. This information has not been amended, or reconsidered in the allocation of these sites.
21949	12	Ms H Griffiths				Object	2.29 Changes to the RAG assessment occurred when the NPSG was made up of purely councillors, 2 of whom had conflicts with the site and were working under dispensation clauses (Sept 2015). The reasons for change to the assessments are not transparent, given the above information which was available to the NPSG at the time of re-assessment or soon afterwards.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21950	1	Mr K Lawton				Object	<p>I wish to comment on the submission made by Horsted Keynes Parish Council in respect of the Horsted Keynes Neighbourhood Plan.</p> <p>I believe that the plan as it stands should not be approved.</p> <p>The primary reason for not approving the plan is that it does not achieve the stated objectives of the plan nor does it meet the basic conditions required of the plan.</p> <p>One of the key stated objectives of the plan is: “Meet Horsted Keynes’s housing needs over the plan period with emphasis on housing that addresses the needs of younger people and families to help maintain the village age profile”</p> <p>Despite many sustainable sites for development being put forward to the Parish Council only two have been included in the plan. The two sites will provide 16 new homes and no affordable housing.</p> <p>The built up area boundary policy will do nothing to achieve the stated objective and there is no guarantee any development sites will come forward. It is also unlikely any of these sites would provide any affordable housing.</p> <p>This plan does not address the stated objective. It does not meet Horsted Keynes’ housing needs nor does it address the needs of young families.</p> <p>The plan does not provide the basic housing numbers required of Horsted Keynes identified in the emerging District Plan</p> <p>Consultation submission</p> <p>Since workshop events in September 2015 run by the Parish Council there has been no consultation at all with the wider community. There has been no presentation of this plan for villagers to review, no neighbourhood plan meetings and very little information published by the Parish Council prior to submission. Consultation since 2015 has been non-existent.</p> <p>This lack of consultation means that the plan has not been developed in a transparent and open way in dialogue with the community.</p> <p>It should also be noted that for much of the time since 2015, the neighbourhood plan steering group consisted of three Parish Councillors, two of whom had a declared conflict of interest with one key potential development sites which was excluded for erroneous reasons. Full details of this were submitted by me in my response to the original consultation.</p> <p>This make up of the steering group, exclusion of one specific site deemed as sustainable by Troy Navigus and a lack of public consultation should be a further reason for not approving this plan.</p> <p>I would urge that for the reasons outlined you do not approve this plan.</p>

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21951	1	Mr I Lings	The Woodland Trust			Neutral	<p>The Woodland Trust is pleased to see that your Vision and Objectives for Horsted Keynes identifies the importance of retaining the identity of your village as a challenge, given its location within the High Weald Area of Outstanding Natural Beauty (AONB). Also, your Neighbourhood Plan does seek to protect and enhance the character of Horsted Keynes, and make sure proposed development with things like the height and bulk of built development does not have a detrimental impact on the High Weald AONB.</p> <p>Trees are some of the most important features of the area for local people. This is being acknowledged with the Mid Sussex Local Plan (2004), which resists development resulting in the loss of woodland hedgerows and trees, and the Pre-Submission Draft District Plan (2015), Policy DP36 (Trees, Woodland and Hedgerows), which protects landscapes for their visual, historical and biodiversity qualities. Therefore, this should also be taken into account with the Vision and Strategic Objectives in the Neighbourhood Plan for Horsted Keynes.</p> <p>Therefore, your Vision for should seek to protect and enhance its character of Horsted Keynes, and be amended to include the following:</p> <p>“To preserve, protect and enhance the countryside including High Weald AONB, open spaces, fields and hedgerows, ancient woodland and trees in the Parish”.</p>

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21951	2	Mr I Lings	The Woodland Trust		6	Neutral	<p>We are pleased to see that the Policy HK6 is about conserving the High Weald AONB in your Neighbourhood Plan for Horsted Keynes. Also, it is great that Policy HK6 does recognise the fact that development should not lead to loss or degradation of ancient woodland in your parish.</p> <p>However, your Plan for Horsted Keynes should also seek to support conserving and enhancing woodland and trees, such as Oak trees, with management, and to plant more trees in appropriate locations. Increasing the amount of trees and woods in Horsted Keynes will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</p> <p>Information can be found here: http://www.magic.gov.uk/MagicMap.asp and http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/</p> <p>Ancient woodland would benefit from strengthened protection building on the National Planning Policy Forum (NPPF). Therefore, we would recommend that your Environment and Green Space section of your Neighbourhood Plan should include something along these lines:</p> <p>“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.</p> <p>The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient woodland protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>Whilst the profile and Vision and Objectives for your Neighbourhood Plan identifies the need to retain and enhance Horsted Keynes and its rural</p>

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character as small rural settlement, and also the need for development to integrate with the landscape. Given that Neighbourhood Plans are a great opportunity to think about how trees can also enhance your community and the lives of its residents, the natural environment and tree and woodland conservation in Horsted Keynes , should also be taken into account as a Strategic Objective in your Plan.

Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Horsted Keynes. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy Page	Type	Comments
21951	3	Mr I Lings	The Woodland Trust		5	Neutral	<p>Local Green Space</p> <p>Whilst Policy HK5 in your Neighbourhood Plan does seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more, to what extent there is considered to be enough accessible space in your community also needs to be taken into account. There are Natural England and Forestry Commission standards which can be used with developers on this:</p> <p>The Woodland Access Standard aspires:</p> <ul style="list-style-type: none"> • That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. • That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes. <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Stemming the flow – the role of trees and woods in flood protection - https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/.</p>
21952	1	Ms K Griffiths			14	Object	<p>Fig 14. 3.3.3 Horsted Keynes Neighbourhood Plan (HKNP) does not bring forward the reduced OAN of 53 dwellings, which seems appropriate and achievable. It fails its objective to 'Meet Horsted Keynes's housing needs over the plan period with emphasis on housing that addresses the needs of younger people and families to help maintain the village age profile'.</p>

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21952	2	Ms K Griffiths				7	Object	<p>¶g 7 2.15 + Pg 17. 5.4 The plan acknowledges Horsted Keynes has a 'very high proportion of 4-5 bedroomed properties' and 'the needs of households (which are for smaller properties)' with '17 households on the housing register with a local connection, 12 of these having Horsted Keynes as their first choice. All of these households were seeking 1- or 2-bed dwellings'. Whilst I acknowledge that the housing register is not static, the plan lacks inclusivity and fails to put forward a sustainable way for smaller dwellings to be delivered, breaching HKNP objectives. Pg 8 2.15</p>
21952	3	Ms K Griffiths			1		Object	<p>¶PPF requires affordable housing to be included in mixed tenure and size developments and not as standalone housing. None of the sites proposed enables affordable housing to come forward with no sites proposed as a community land trust or rural exception site at any call for land. Hoping this will come forward as part of HK1 BUAB 10 dwellings policy is wishful thinking.</p>
21952	4	Ms K Griffiths				13	Object	<p>¶g 13, 3.3.2 Objective to 'Maintain and enhance existing and establish new local services and facilities'. Pg 8 2.15 St Giles Primary School has had a falling school roll resulting in reduced teaching staff and amalgamation of classes from September 2017. School Governors made the PC aware of this and accurate school numbers at PC meetings and in writing. The school roll is quoted by PC at 120, which remains incorrect. Lack of family dwellings that would appeal to families using state education fails to either maintain or enhance St Giles Primary School. WSCC report that state schools do not have the capacity to take more children, which, unless closure is planned, is incorrect for St Giles Primary School.</p>
21952	5	Ms K Griffiths			1	16	Object	<p>¶g 16. HK1 BUAB policy of permitting 10 dwellings or less adjacent to the BUAB was not publicly consulted on during Regulation 14 pre-submission consultation. This could materially change the village, not deliver on bringing forward identified smaller and affordable homes and would affect parish councillors who are landowners, but who have not declared their interests regarding this. Consequently, this fails on many levels.</p>
21952	6	Ms K Griffiths				15	Object	<p>¶g 15 4.5 'It is particularly important that applicants are able to demonstrate that their proposals will not have a detrimental impact on the AONB (as required by Policy HK6)'. Any development is detrimental to the AONB; it is up to the decision maker if that detriment is less than the benefit gained or to seek suitable mitigation.</p>

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21952	7	Ms K Griffiths			2+13		Object	Police house Field HKPN002, 10 dwellings on 0.26ha and Jeffrey's Farm buildings HKPN013, 6 dwellings on 0.7 ha both represent an inappropriate use of land with regard to allocated housing density, with no explanation provided as to these decisions. This fails to have regard to NPPF policies, NP objectives and contributing to sustainable development.
21952	8	Ms K Griffiths				13	Object	Fig 13. 3.2 The Vision for Horsted Keynes was changed without public consultation because it had 'become out of step with current (site) proposals' SG Minutes held in private 25 January 2016.
21952	9	Ms K Griffiths				24	Object	Fig 24. 6.8 The recreation ground and cricket field are noted as being valued assets but are also 'infill' within BUAB, Policy HK4, Pg 22, on which the plan promotes development.
21952	10	Ms K Griffiths				17	Object	10. The objectives were also changed without public consultation. From 'redressing the balance of an ageing population' to 'maintain the village age profile. How will the NP achieve this when '94% of respondents said that they intended to stay living in Horsted Keynes on retirement'. Pg 17. 5.6 An ageing population is not addressed by providing care home provision, nor is it a healthy community profile.
21952	11	Ms K Griffiths					Object	Three members of the July 2015 steering group, made up from four parish councillor members, had clear conflicts of interest but obtained dispensation, granted by the Clerk, who also had conflicts of interest, in order to operate. These councillors did not disclose their interests prior to being elected as councillors, but publicly made it clear they opposed any development following reforming of the steering group. This breaches parish councillors code of conduct and constitution, which requires councillors to act objectively and in the public interest.
21952	12	Ms K Griffiths					Object	It is questionable whether the SG were constitutionally compliant as they were 'functioning' without a Chair at a time (Jan-April 2016) when the PC were without a Chair, Vice Chair or Clerk. January 2016 - Councillor David Colville resigned his membership of the SG and role as Chair. • April 2016 - Councillor Sarah Webster elected as Chair

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21952	13	Ms K Griffiths				Object	<p>13. The SG were cautioned by their professional advisor to wait until they were constitutionally correct, but his advice was not acted on and the SG continued to work on the NP. Email Chris Bowden to SG 6/1/16</p> <ul style="list-style-type: none"> Facebook Neighbourhood Plan Page 26/2/16- The NPSG are currently working on the final elements of the draft plan with the aim to be able to go to pre submission by the end of March. <p>https://www.facebook.com/YourVillageHK/</p>
21952	14	Ms K Griffiths				Object	<p>Steering group meetings were held in private with no reason given as to why the public were prevented from attending, breaching basic conditions and council regulations.</p>

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21952	15	Ms K Griffiths				Object	<p>Sites going into the NP must be available, suitable and achievable, but this was not sought by PC who only enquired about availability. Between August and November 2016, the Parish Council contacted all landowners who had put forward land to find out if their land was still available, if there had been any fundamental change and whether it could be considered for a rural exception site. All land being considered for site allocation was still available and there were no offers for a rural exception site.</p> <p>SG Meeting 14/1/16 with MSDC discussing allocating 6 dwellings on Jeffrey's Farm Buildings (JFB): 'There was a consensus that in this case there was unlikely to be a level of development which met the needs of the landowner'. Aware of this, the PC did not discuss viability with the land owners and I understand dwelling numbers were imposed on the owners by the Parish Council with the threat of withdrawing the site if they did not agree. This does not follow fair process and fails to contribute to sustainable development. As the PC states all sites were treated equally, the presumption is that Police House Field owners were subject to the same treatment.</p> <p>Troy Navigus refer to Jeffrey's Farm amalgamated sites as a new proposal in October 2016 when it was submitted as part of the first and second calls for land. The site was removed from discussion at September community workshops against professional advice and was not available for public comment during Regulation 14 pre-submission consultation.</p> <p>Troy Navigus said in their October 2016 assessment of Regulation 14 pre-submission representations: 5.9 It is our recommendation that serious consideration is given to the allocation of the Jeffreys Farm site. This would however involve a material change to the Regulation 14 Neighbourhood Plan and we would therefore recommend considering re-running the Regulation 14 Consultation. The PC failed to seek solutions to problems, rejected amalgamated Jeffrey's Farm sites, presumably to avoid re-running Regulation 14 consultation and failed to give reasons for rejection.</p>

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21952	16	Ms K Griffiths					Object	<p>Inaccurate information on RAG assessments was not updated when errors were highlighted, which is acknowledged by PC in submission document. Information was with-held which could have prevented Troy Navigus, professional advisor to the Parish Council, the general public and the PC from making informed assessments, representations during Regulation 14 consultation and in deciding on sites to go into the plan. Efforts to rectify inaccurate information was to be discussed at the PC meeting announcing NP site selection, but the order was changed by the Chair of PC to proceed with selecting sites prior to hearing this information, which was then disregarded as sites had been selected, resulting in the PC not being fully aware of all the facts prior to making site selections.</p>

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21952	17	Ms K Griffiths				Object	<p>The SG was aware of the downward changes to C2/C3 distribution of Westall House, Site 028, but did not reflect this in information given as part of the Regulation 14 consultation in April 2016. Notes from NPSG meeting 29 Feb 2016 'contact Westall and check whether current planning application for residential care rooms replaces the 14 new independent units we were expecting'.</p> <ul style="list-style-type: none"> • Sustainability assessment Pg4. 2.3 'The Horsted Keynes Neighbourhood Plan has been developed through an extensive programme of engagement with the local community.' And Consultation Statement.' 1.11The volume of correspondence, both written and verbal, and the number of attendees at exhibitions, workshops and meetings, made it clear that there were no groups that were not engaging well in the process' • No NP meetings were held in public from November 2015 to April 2016, during which time the vision changed by 29/2/16 without public consultation or engagement with the community. • Regulation 14 representation feedback showed an appetite for more development which was 'noted' by PC but not proactively secured. Merging NP items into general PC meetings gave less opportunity for public discussion due to other items on the Agenda and meetings were dominated by vocal anti-development parishioners, making it very difficult for anyone who shared a different view to be heard. • Notes from 'chat' with Chris Bowden 12 January 2016 'He (Chris Bowden) said our plan has been even more divisive than has happened elsewhere'. Given Horsted Keynes is one of the last parishes to have a NP, this is quite a statement. • Facebook Neighbourhood Plan Page https://www.facebook.com/YourVillageHK/ demonstrates the amount of community engagement. • The PC took 'control' of the NP following PC elections in May 2015. The one remaining Steering group member was removed from the SG by the Chair of the PC in July 2015. The PC represent parishioners but are not representative of them with no members representing people living in social housing, hard to reach groups, vulnerable adults, children and young adults or disabilities.

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21952	18	Ms K Griffiths					Object	<p>Consultation Statement 2.22 Another issue raised by a number of people was the question of whether there was a restrictive covenant on site 017. On 1st March 2015 the covenant holder confirmed that the covenant did not permit the erection of any building of any type on the land other than for a sports pavilion with storage and toilet facilities. The Sustainability Assessment was not updated with this information at this time with the presence of a covenant repeatedly used by the PC to discredit JF sites. The Sustainability Assessment was only updated to accurately reflect that the covenant did not prevent building prior to submission to MSDC, long after community workshops and Regulation 14 consultation had ended.</p> <p>From SG notes on Skype call with Chris Bowden 12/1/16 on Jeffrey's Farm Buildings 'Best to use existing track with suitable widening'. The track is capable of achieving this and land required to do so is in the same ownership. This could bring forward a dwelling density in line with MSDC advice and be a more appropriate use of land. Instead, the PC imposed six dwellings on the site owner which would not bring forward smaller homes required.</p>
21952	19	Ms K Griffiths				17	Object	<p>The beneficiary of the covenant on Jeffrey's Farm HKPN017 is a parish councillor and Steering group member who lives in Jeffrey's Farm house and applied for dispensation to the Clerk who lives opposite the site, along with a neighbour, also on the PC, to make decisions about Jeffrey's Farm sites. The site went from green to red in the RAG assessments with no new information coming forwards or reasons given by PC for change in assessment.</p>

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21953	1	Mr P Miles			19	Neutral	<p>Policy HK19 for Westall House is no longer relevant now that a planning application for this site has been approved. (Planning Reference DM/17/1262)</p> <p>However, the additional 20 units of C2 accommodation should be counted as windfall.</p> <p>This should reduce the residual number of dwellings to be delivered in HK through the NP from 53 to 33 (reference paragraph 9.3 on page 34). This approach would be in accordance with the following NPPG Reference ID: 3-037-20150320</p> <p>Following my detailed correspondence with MSDC on this matter, I note that no convincing explanation has been put forward by them for departing from the NPPG (other than MSDC are unclear as to how to do this in practice).</p> <p>I note that the planning officer, who considered the Westall application, quoted the new homes bonus scheme as economic justification for sustainable development in his recommendation for approval. It does not appear logical for this development to qualify for a new homes bonus but not count towards the housing numbers.</p> <p>Even if you don't accept my comments above, and conclude that MSDC are correct in not counting the C2 accommodation, there is a secondary argument to be considered and that relates to the incorrect classification of the Extra Care units.</p> <p>The Extra Care units should be classified as C3 in accordance with the definitions contained within the MSDC HEDNA Addendum.</p> <p>The Extra Care units for which planning permission has now been approved clearly fit within the C3 classification but MSDC appear to have incorrectly allowed them to be classified as C2 by the applicant (presumably to suit</p>

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							<p>their business model).</p> <p>I consider that due allowance should be made within the housing numbers to reflect the fact that approval has been given for an additional 8 dwellings which should by rights be classified as C3.</p> <p>Therefore even if the 12 Dementia Care units are not counted, the additional 8 Extra Care units should be counted as windfall.</p> <p>This would reduce the residual number of dwellings to be delivered in HK through the NP from 53 to 45 (reference paragraph 9.3 on page 34).</p>

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21953	2	Mr P Miles				7	Neutral	<p>The above statement is misleading as it implies that MSDC have tested all policies within the NP to assess their impact on the Ashdown Forest but this is not actually the case.</p> <p>By reference to the HRA screening report and my attached communications with MSDC, it should be noted that an allowance for 24 dwellings (for the development sites HK17, HK18 & HK19) was included within the transport model.</p> <p>An additional allowance was also included within the transport for future windfall across the district.</p> <p>However, there appears to be a fundamental flaw in the logic, being applied by MSDC, in assuming that the windfall allowance can be located anywhere within the district.</p> <p>For this to have been properly modelled, the approximate location of the additional development would need to have been known or assumed.</p> <p>The effect of a larger proportion of the additional units being located in the part of the district close to the Ashdown Forest would obviously have a far greater impact than if a higher proportion were located, for example, around Burgess Hill.</p> <p>It is therefore reasonable to assume that the additional windfall would have been modelled on a directly proportional basis to other development in the model.</p> <p>The proportional allowance that would have been made in the transport model for further windfall in HK would only equate to about 2 or 3 dwellings.</p> <p>It will therefore be necessary for a further transport model and detailed in-combination HRA to be completed to support any development proposed under the criteria based clause HK1 (for</p>

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								<p>example).</p> <p>Following the Examination of the DP, it is clear that MSDC will need to carry out a comprehensive in-combination assessment of the impact of the proposed stepped trajectory (to support the increase from 876dpa).</p> <p>It would make sense to assess the potential impact of additional windfall in HK (in accordance with HK1) at that time.</p> <p>However, it should be made clear that the HRA that has so far been completed by MSDC does not currently support HK1 or any other speculative development.</p>
21993	1	MS R Miles					Neutral	<p>I'm not entirely happy with less than 10 dwellings being allowed outside the built up boundary but I understand that this complies with District Plan policy DP6. I think that including one or more small sites for a Community Land Trust scheme could be a way of providing 100% affordable housing in the village.</p>