

Horsted Keynes Neighbourhood Plan

Consultation Statement

October 2017

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1 CONSULTATION PROCESS

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2015 (as amended) in respect of the Horsted Keynes Neighbourhood Plan (HKNP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 12(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the HKNP have been developed as a result of extensive interaction and consultation with the community and businesses within the parish. This has taken place over approximately three years and has included surveys, public exhibitions, workshops and face-to-face activity. Engagement on the emerging neighbourhood plan has been overseen and co-ordinated by the HKNP Steering Group which was formed to lead the HKNP. Views and interactions from this process led to the Vision and Objectives in Section 3 of the HKNP, and subsequently therefore form the basis for the key policies set out in Sections 4 to 9 of the HKNP.

Organisational structure of the HKNP

- 1.4 The HKNP Steering Group was set up as a working committee of the Parish Council, consisting of parish councillors but also allowing non-councillors that lived, worked or owned land or property within the parish to join. All meetings were minuted and these minutes were made publicly available. The chronology of the Steering Group is as follows:
- April 2014 - the Steering Group (SG) was formed, consisting of Councillors Kenton Lawton (Chair), Mark Syrett and Peter Whatling and local residents Terry Higham and Simon Doher.
 - May/June 2014 - Simon Doher stepped down and Councillor Marjorie Fritz joined.
 - July 2014 - Councillor David Colville joined, together with local resident Angela Newman.
 - January 2015 - Councillor Mark Syrett resigned.
 - March 2015 - Councillor Kenton Lawton resigned. Peter Whatling took over as Chair.
 - May 2015 - Councillors Kirk, Vince and Webster joined.
 - May/June 2015 - Councillor Marjorie Fritz and Angela Newman resigned.
 - May 2015 - Peter Whatling stood down as Chair.
 - June 2015 - at the Parish Council meeting it was reaffirmed that the Steering Group should be a Committee of the Parish Council to provide support and accept overall responsibility for the Neighbourhood Plan.
 - June 2015 - Councillor David Colville elected as Chair.
 - July 2015 – Councillor Terry Higham resigned.

- July 2015 – Parish Council Chairman Loz Allan wrote to Peter Whatling in July to notify him that the Parish Council had agreed to restrict membership of the SG to elected Councillors. Peter Whatling was duly removed from the SG.
 - January 2016 - Councillor David Colville resigned his membership of the SG and role as Chair.
 - April 2016 - Councillor Sarah Webster elected as Chair.
- 1.5 All decisions throughout the process of preparing the HKNP were taken by the full Parish Council, with councillors declaring their interests as appropriate.

Summary of engagement process

- 1.6 The SG assembled an action plan and associated timetable to help ensure that all groups were given an opportunity to engage. This was updated throughout the early months of the process to identify any gaps or under-representation from particular stakeholder groups and ensure that plan preparation remained on track.
- 1.7 A great number of events and interaction were carried out with the community by members of the HKNP group ranging from conversations with friends to large scale events involving the whole community. Activities have been divided into different categories and detailed in the remainder of the Consultation Statement.
- 1.8 In June 2014, the SG initiated a monthly article in the village Parish and Parishioner (P&P) magazine which is delivered to every household in the Parish. This continued until January 2016. The information published in the P&P was supplemented in July 2014 by the creation of Facebook and Twitter accounts and the use of the Parish Council website to publish information and receive comments back from the public. Indeed, the Parish Council website has a whole section devoted to NP at <http://horstedkeynesparishcouncil.com/neighbourhood-plan/>.
- 1.9 In July and August 2014, the SG identified a number of stakeholders that would be approached as part of the consultation process:
- Medical Practice / Dental
 - Metrobus / Dial a Ride (or local equivalent)
 - Abbeyfield / Bluebird Healthcare (or similar)
 - Local Housing Associations
 - MSDC Social Care Director
 - Parish Churches - representation
 - Pre School families
 - 1st Steps families
 - St. Giles School
 - St. Giles Parent-Teacher Association (PTA)
 - Brownies
 - Lunch Club
 - Businesses

1.10 After reviewing the work to be done, tasks were broken down into seven manageable sub groups which met at irregular intervals depending on progress and priorities:

- Finance and Administration
- Communication
- Framework
- Community Engagement
- Housing / Development
- Infrastructure / Economy
- Environmental

1.11 Throughout the process it was clear that a large proportion of the community were engaging in the process. The 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.

2 CONSULTATION ACTIVITY

Development of Vision and Objectives

- 2.1 Initial work was undertaken to consider the 2008/2009 Village Plan (it was intended that the Neighbourhood Plan would build upon this comprehensive document) and the following surveys undertaken in 2012/13:
- 2012 - People, Businesses and Housing to which there were 322 responses
 - 2013 - Crucial Infrastructure to which there were 197 responses
- 2.2 From this the working groups began to identify the key challenges and issues represented in the outcome.
- 2.3 A third survey was initiated in 2014 when members of the SG collected views from First Steps; Pre-school; WI; Saturday circuit training class; and weekend shoppers at the village store.

| Vision statement item | Important | Not important |
|---|-----------|---------------|
| Facilities (shop, post office, and pubs) have been retained | 119 | 0 |
| An attractive, rural village centred round the existing village green | 115 | 2 |
| Fast broadband and good mobile telephone reception | 110 | 5 |
| All sports and other green spaces within the village have been retained and additional areas have been developed (community orchard, community gardens, meadowland areas, new allotments) | 104 | 1 |
| St Giles School has continued to thrive and expand | 104 | 5 |
| Footpaths, recreational areas, children's playground, outdoor gym for adults have been extended or developed | 102 | 2 |
| Sufficient parking has been provided in new residential areas to avoid significant additional parking within existing village | 101 | 11 |
| Traffic managements have been installed to regulate on-street parking and improve road safety | 90 | 13 |
| Bus service has been retained | 85 | 7 |
| Housing has increased by 15% comprising mainly of small and medium sized family properties ¹ | 63 | 24 |
| A new small, non-licensed café has been established | 64 | 31 |

- 2.4 An opportunity to express any particular concerns was also provided. The total number of comments received on a range of topics was:

¹ The 15% growth figure was believed to be in line with the rate of growth over the previous few years. However, following further research, concerns were raised about Office for National Statistics (ONS) data regarding number of houses in Horsted Keynes in 2001 and 2011. This was queried with the ONS which stated that the Census figures could not be relied on, so we obtained the actual number of dwellings built over the last 30 years and the population based on the electoral roll. This was reported at the Parish Council's regular monthly committee meeting in August 2015 and was part of the reason that Objective 3 was later changed.

| Subject of Comment | Number Recorded |
|---|-----------------|
| First time buyer housing/affordable housing | 9 |
| Speeding / traffic calming | 8 |
| Retention of facilities | 7 |
| Retain and extend bus service | 5 |
| Preserve green spaces | 3 |
| No urbanisation – traffic lights etc | 3 |
| Too much development | 3 |
| Elderly care | 2 |
| Parking | 1 |
| Litter | 1 |
| Upkeep of church | 1 |
| Community spirit | 1 |
| Maintain balanced age profile | 1 |
| Improve broadband | 1 |

2.5 Comments were requested via Facebook, Twitter, Web Site, emails and letters delivered to the Parish Office.

2.6 In September 2014 a draft vision was published. It was included on the Parish Council website, in the P&P (October and November 2014). Comments were welcomed and received. The vision was:

'In 2034 Horsted Keynes remains an attractive rural village, centred on the existing village green, providing a safe and convenient environment for the whole population. The village and its surroundings attract visitors from all over the region who contribute significantly to the ongoing viability of the community assets.

General economic development has resulted in a demand for additional accommodation throughout the region. The arrival of fast broadband and good mobile telephone reception has allowed the development of new businesses within the parish and increased the amount of home working undertaken. Housing within Horsted Keynes has increased by approximately 15% comprising mainly more affordable small and medium sized family properties, generally on developments beyond the current village boundaries. The addition of new families has offset the tendency towards an ageing population and maintained the demographic balance in line with that of the region as a whole.

The increasing population has improved the viability of the consumer businesses within the village, enabling the retention of all the current facilities (shop, post office and pubs) and the establishment of a new small, non-licensed, café. Just outside the village centre the Bluebell railway now links to both East Grinstead & Haywards Heath.

St Giles School has continued to thrive and the increased village population has resulted in a significant rise in the school roll, the majority of whom are resident within the parish.

All existing sports and other green spaces within the village have been retained and supplemented by additional areas within the new residential developments, including a community orchard, community garden, meadowland areas and new allotments. Community

Infrastructure Levies have also enabled the improvement of existing footpaths and recreational areas, including a new and extended children's playground and the provision of out-door gym equipment for adults.

The village has retained its bus service and some road improvements and traffic management measures have been installed to regulate on-street parking and improve road safety. The new residential developments have been spread throughout the parish looking where possible to minimise additional through traffic, and sufficient parking has been provided for within these areas to avoid the generation of significant additional parking within the existing village.'

2.7 The following objectives were also published:

- 1. Conserve and enhance the environment of the village in order to maintain its distinct rural identity and outstanding landscape setting.*
- 2. Maintain and enhance existing and establish new local services and facilities.*
- 3. Increase the population at a similar rate to that which has occurred in recent years (average 5 properties per year, around 100 properties in total) whilst maintaining the current age.*
- 4. Support local businesses and provide enhanced employment opportunities within the parish including home working.*
- 5. Maximise use of the local bus service to improve its viability.*
- 6. Minimise the impact of road traffic on the village through the provision of limited traffic calming and adequate parking in any new developments.*
- 7. Minimise the adverse environmental effects of new development and provide energy reduction and sustainable energy opportunities for the whole village.*

2.8 Following consultation on the vision and objectives in 2014, concerns were raised about Objective. At the consultation event in January 2015, a new Objective 3 was presented and views sought:

3. Increase the population and meet their 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.

2.9 Following comments, this revision to the objective was then subsequently amended to read: *'3. 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.'*

2.10 Following ongoing consultation in 2016, the vision was amended as follows:

'In 2031 Horsted Keynes remains an attractive rural village, centred on the village green, and is a desirable place to live, work and visit. It has a thriving local economy and is able to sustain sufficient essential services and facilities to meet most local needs. Homes are available for all stages of life and circumstances and there is a strong sense of local community which contributes to low levels of crime.

Development has taken place in a sustainable way, at a scale and form that preserves the distinctive rural character, landscape and community ethos.'

2.11 This revised vision and revised Objective 3 were included in the Pre-Submission Version of the Neighbourhood Plan.

Sites consultations

- 2.12 During August and September 2014, the sustainability criteria used to assess possible site allocations were developed and published.

1st Call for Land – November/December 2014

- 2.13 A public call for land was put out in November/December 2014. This was published on the Parish Council website and in the P&P and Mid Sussex Times. This resulted in 24 sites being submitted which were assessed against the sustainability criteria – 2 sites were assessed as ‘unavailable’; 3 sites as ‘undeliverable’; 10 sites as ‘unsustainable or unsuitable for development’; and 6 sites as ‘potentially sustainable’ or ‘sustainable’. The remaining 3 sites were submitted for use as potential mobile phone mast sites and were assessed separately.

Open Morning Event - January 2015

- 2.14 An A5 flyer was delivered to every household in the Parish advertising this event. Other advertising was achieved via the Parish Council web site, Facebook and Twitter.
- 2.15 Exhibition boards displayed information gathered to date with initial analysis.
- 2.16 The draft vision, objectives, policies and sustainability criteria, together with the 24 sites submitted in the first Call for Land were presented and the 300+ people who attended were asked for their comments.
- 2.17 In respect of the sites, people who attended were presented with the sustainability assessments and maps showing where each site was within the Parish. For each of the six sites that were designated ‘potentially sustainable’ or ‘sustainable’, the potential benefits and issues were set out. General comments were invited on all the material on display, and post-it notes were attached by people saying ‘agree’, ‘not agree’, etc.
- 2.18 The January 2015 open event really raised the profile of the Neighbourhood Plan in the village. More residents became engaged and Neighbourhood Plan Steering Group meetings were well attended by the public. The proposals for just one or two large scale developments were very unpopular. Much concern that Horsted Keynes would lose its identity and rural character if large estates were built. Support was expressed for smaller scale developments spread around the village.

Frequently Asked Questions (FAQs)

- 2.19 In February 2015, the SG was being inundated with comments and letters questioning the plan and site assessments. This not only took a huge amount of time to respond to, particularly in respect of what the SG considered to be inaccurate statements. It was agreed to develop a set of FAQs which would be published on the Parish Council website which directed everyone to. It was also agreed that the SG would only respond to genuine issues which are not covered by these FAQs.
- 2.20 The first FAQs were uploaded onto the Parish Council website in mid-March 2015. The FAQ web page was replaced towards the end of 2015 by updated FAQs. The FAQs ceased to be updated by early-2016, as the emphasis was on building all the material required for Pre-Submission.

West Sussex County Council consultation 1

- 2.21 In February 2015, advice was sought from WSCC Highways in respect of the short-listed housing sites. This advice was taken because of concerns raised by a number of people in the community

regarding highway matters on a number of the sites. This solely desktop advice (i.e. no site visits were made) was as follows:

Further to your request for comments upon your short-listed housing sites, and given that there is limited detail available at this stage, the following comments are very much the result of a 'high level' assessment and are made without prejudice towards any future consultations or planning applications:

HKNP002 - Police House Field

There are no in-principle issues with this proposal and it is possible that this site has been investigated for development in the past. The only matter we would raise at this stage is the location of the suggested access that we would suggest needs to be at the western end of the site. There is otherwise a risk of difficulties with achieving sufficient visibility to the east due to the carriageway alignment.

HKNP012 - The Old Rectory, Church Lane

The potential quantum of development is noted. The site is accessed along what are in places narrow lanes with no specific pedestrian facilities. The carriageway widths and alignments would act to restrict vehicle speeds. It is noted that there are already a number of dwellings accessed along the lane and that residents have to walk in the carriageway. This proposal would generate additional vehicle and pedestrian movements, although speeds would remain low. A key matter would be the provision of facilities for pedestrians from both existing and future developments. It would appear that a pedestrian route could be provided within the site. This would seemingly only really benefit future residents, however, with existing residents having to walk in the carriageway with additional development traffic. There are sections of carriageway that are narrow with limited forward visibility. This proposal has the potential to increase the risk to pedestrians. The off-road route proposed also discharges pedestrian onto a very narrow section of Church Lane with steep embankments. Whilst apparently lightly trafficked, there is still a potential issue for conflict between pedestrians and vehicles.

If this site were to be taken forward, greater consideration would need to be given to providing for pedestrians on the existing narrow lanes.

HKNP013 - Jeffreys Farm Buildings

Whilst vehicular access would need to be considered in greater detail (visibility from the existing access appears restricted to the north), the principle of development is otherwise acceptable. A length of pedestrian footway would need to be provided to tie in with existing footways on Lewes Road.

HKNP014 - Land to North of Farm Buildings (A), Jeffreys Farm

Whilst vehicular access would need to be considered in greater detail (the provision of visibility splays would also have a notable impact upon the existing hedgerow), the principle of development is otherwise acceptable. It is recommended that a pedestrian route is provided alongside the proposed vehicular access. This would then follow the potential desire-line for pedestrians, which the route as shown does not. Such a route would be achievable within the limits of the existing highway.

HKNP016 - Sugar Lane Field

Two access options are indicated. An access (vehicular and pedestrian) would be better placed to the south or the centre of the site (there is no reason why a crossroads arrangement could

not be provided with Jefferies). This would then maximise visibility and ensure the tie-in with existing pedestrian access routes. The principle of development is otherwise acceptable.

HKNP017 - Jeffreys Farm Field

Whilst vehicular access would need to be considered in greater detail (visibility from the existing access appears restricted to the south), the principle of development is otherwise acceptable. A length of pedestrian footway would need to be provided to tie in with existing footways on Lewes Road.

If you need advice as to the drawing of sightlines and visibility splays you are recommended to consult the Manual for Streets, which is a national design document produced by the Department for Transport and the Department for Communities and Local Government.'

Restrictive covenant on Front Field (HKNP017)

- 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.

West Sussex County Council consultation 2

- 2.23 In July 2015, WSCC was invited to provide further responses in respect of possible site allocations. Its response was as follows:

'These post meeting notes result from site observations and the meeting held on 1st July 2015 and should be read in conjunction with site sketches. They reflect the views and opinions of the author and are for Comment and Consultation ONLY.

HKNP 012 The Old Rectory, Church Lane

Surface water runoff from the development area will need to be kept to a minimum as the capacity of the drainage system under the road is unlikely to have any spare capacity.

Visibility looking south from the existing access is limited and can't be increased without purchasing additional land.

Mismatch between highway boundary and edge of development.

High demand for On-street parking.

Limited pedestrian facilities in the area.

Narrow roads and difficult turning manoeuvres

HKNP 002 Police House Field

Unclear where vehicle access(es) will be, but should be as close to the western boundary away from the mature oak tree as possible.

There are no highway gullies along this section of road so surface run-off must be minimal.

Assume VCO (Vehicle cross-over) used to gain access to individual plots not a bell mouth.

Hamsland

Sub-station not shown on plan, may affect visibility and access layout.

lay out of access dependent on the number of properties (VCO or Bell mouth) either will require good visibility due to On-street parking on opposite side of road.

mature trees along western boundary of access, may affect visibility splay.

high demand for on-street parking.

HKNP 016 Sugar lane

Existing access has limited visibility and limited scope to improve it without purchasing additional land. Suggest moving access northwards to between existing mature trees to reduce impact on vegetation and allow full standard visibility splays to be incorporated into the design.'

2nd Call for Land - August/September 2015

- 2.24 A second call for land resulted in four new sites being submitted which were assessed against the sustainability criteria - two sites were assessed as 'unsustainable' and two sites as 'potentially sustainable' or 'sustainable'. Following the submission of site HKNP025, site HKNP003 which was adjacent to it was reassessed. For the consultation in January 2015, site HKNP003 was assessed as "red" due to lack of vehicle access; however with the submission of site HKNP025 and the potential for vehicle access to HKNP003 via that site, HKNP003 was designated "amber". However it was noted that access was dependent upon HKNP025 being designated for development and the related issue of the capacity of Hamsland to accommodate further vehicular traffic remained.

Revised Assessments for Jeffreys Farm / Sugar Lane sites

- 2.25 The Sugar Lane sites were re-assessed in September 2015 in order to take account of the following considerations:
- the covenant on HKNP017;
 - their location to the west of Sugar Lane which currently acts as the defensible boundary for development within the village to the west;
 - advice from West Sussex County Council (WSSCC) Highways regarding access to the sites and the lack of footpath along Sugar Lane which could raise highway safety concerns.
- 2.26 Informal officer advice by Mid Sussex District Council (MSDC) advised that there would be a risk in using all the fields around Jeffreys Farm as it would potentially create a 'knock-on' or 'domino' effect of development and there would be little control over a large estate ultimately being developed. A strong and consistent message from the community engaging in the Neighbourhood Plan process has been that large estates would change the character of Horsted Keynes and are not desirable. Such a development at Jeffreys Farm / Sugar Lane could also create a precedent for similar sites within the parish to be considered for development.
- 2.27 Informal officer advice by WSSCC 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.
- 2.28 The only possible residential development that may be achievable at Jeffreys Farm is a small, courtyard-style scheme of approximately 6 dwellings incorporating the existing farm buildings. This would still have potential highway access and safety issues. It is considered that the breach of the defensible boundary currently provided by Sugar Lane, coupled with the relatively limited contribution that the site would make to addressing the housing needs of Horsted Keynes,

means the site would not support the objectives of the Neighbourhood Plan in a meaningful or sustainable way.

- 2.29 In view of this, all Jeffreys Farm/Sugar Lane sites were reassessed and the outcome of this process was published on the Parish Council website. This resulted in sites HKNP014 and HKNP016, which were assessed as 'amber' in January 2015, changing to 'red' in September 2015, and site HKNP017, which had been assessed as 'green' in January 2015, also changed to 'red' in September 2015.

September 2015 Workshops

- 2.30 Workshops were advertised in the monthly P&P magazine, on social media, announced at St Giles Church service, and on posters around the village. People were invited to sign up to attend
- 2.31 There were 10 workshops held at days and times to be as inclusive as possible. Each one was chaired by a Councillor and assisted by a volunteer to take notes.
- 2.32 A booklet was prepared summarising feedback from the January 2015 open event and an update on site options. This booklet was delivered by hand to every dwelling in the parish at the end of August. See <http://horstedkeynesparishcouncil.com/wp-content/uploads/2016/04/Consultation-Booklet-final-final.pdf>.
- 2.33 Material presented at the workshops was prepared including maps, vision and objectives and detailed information on all sites which were or had been assessed as sustainable. See <http://horstedkeynesparishcouncil.com/wp-content/uploads/2015/10/1015-September-workshop-material.pdf>.
- 2.34 170 residents each attended one of the two-hour workshops. Attendees were split at random into groups of around 8-10 people allowing everyone a full opportunity to ask questions, take part in discussion and express their views. Officers from MSDC attended a few of the workshops to answer questions. A questionnaire was provided to each participant and was used to provide a framework for the discussion. Completed questionnaires or substitute emails were received from 126 people including a small number who did not attend. The following common themes all came through strongly:
- Concern over road traffic, safety and parking.
 - Need some affordable housing
 - No large estates.
 - Concerns about defensible boundaries and the domino effect.
 - Don't open up any area of the village to uncontrolled development.
 - Environmental concerns
 - Avoid urbanisation. No street lights.
 - Increased pressure on infrastructure.
 - Change to dwelling size policy, with people favouring a requirement for more 2-bed and fewer 1-bed properties.
- 2.35 Details of the events including documents presented, scribe notes and the full feedback report can be found at <http://horstedkeynesparishcouncil.com/consultation-events/>.
- 2.36 Anonymised questionnaires were made available for public scrutiny at the Parish Office.

- 2.37 In October and November 2015, the SG considered feedback from the workshops and held further consultations with landowners and MSDC.
- 2.38 The SG prepared detailed site allocation recommendations for consideration by the full Parish Council at a meeting on 8th December 2015. This meeting was well advertised on social media and the discussion material was made available to the public before the meeting via the Parish Council website.

Parish Council meeting to determine draft Site Allocations

- 2.39 In December 2015, a Parish Council meeting considered the site allocation recommendations of the SG. The material can be viewed here <http://horstedkeynesparishcouncil.com/pc-meeting-081215-np-site-allocation-recommendations/>.
- 2.40 This meeting was well advertised on social media and the discussion material was made available to the public before the meeting via the Parish Council website. The meeting was well attended by the public.
- 2.41 A decision was deferred on Jeffreys Farm Buildings until further consultation had taken place with the landowners and MSDC.
- 2.42 At the meeting a petition was presented to the Parish Council by representatives of Hamsland residents accusing the SG of bias. It was later discovered that signatories had not seen the wording of the petition and had thought it was actually against development on Hamsland sites.
- 2.43 No further monthly SG meetings were held from this point as it was felt necessary, given that the draft Neighbourhood Plan had reached a point where several key decisions needed to be made, that all HKNP matters were discussed and decided by the full Parish Council. This therefore became the best opportunity for the public to ask questions and express their views.

Mid December 2015 until April 2016

- 2.44 During this period, further consultation was undertaken with landowners and MSDC about site allocations and overall housing numbers. Site allocations were completed at the meeting on 9th February 2016 with the decision to include Jeffreys Farm Buildings.
- 2.45 The revised draft of the HKNP was prepared for Pre-Submission Consultation. Members of the public continued to attend Parish Council meetings to ask questions and make comments on the plan.
- 2.46 The site allocations agreed by the Parish Council took into account workshop and other feedback in selecting smaller sites which would not lead to uncontrolled development or breach defensible boundaries.
- 2.47 Policy HK11 was included to deal with concerns raised by a number of members of the community about light pollution.
- 2.48 Dwelling size Policy HK2 was amended to reflect a change in balance towards more 2-bed and fewer 1-bed dwellings.
- 2.49 Policies HK15 and HK16 were adjusted to ensure that sufficient off-street parking would be provided for new dwellings and there would be no net loss in existing parking spaces.

3 PRE-SUBMISSION CONSULTATION

- 3.1 The Pre-Submission Consultation (Regulation 14) was undertaken between 14th April and 26th May 2016.
- 3.2 This was advertised in Parish & Parishioner magazine, Parish Council noticeboard, social media, a banner and posters around the village.
- 3.3 Hard copies of the draft plan, the Sustainability Appraisal Scoping Report and the Sustainability Appraisal were placed in the Parish Office, the Martindale Centre, Horsted Keynes Village Stores, the Horsted Keynes Club and The Green Man and The Crown public houses.
- 3.4 Copies of submission documents were placed on the Parish Council website together with details of how to respond and links to detailed site assessments and other background information (<http://horstedkeynesparishcouncil.com/pre-submission-neighbourhood-plan-documents/>).
- 3.5 A dedicated email address was set up to receive responses and the Parish Office postal address provided for non-electronic responses.
- 3.6 In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by letter or email. In addition, a range of parties that the SG considered were likely to have an interest in the plan were also written to. The following bodies were written to:

- Mid Sussex District Council
 - Natural England
 - Environment Agency
 - Historic England
 - Highways England
 - Network Rail (Kent, Sussex, Wessex)
 - West Sussex County Council
 - Horsham and Mid Sussex Clinical Commissioning Group
 - NHS Horsham and Mid Sussex
 - National Grid
 - Southern Gas Network
 - Southern Water
 - South East Water
 - Thames Water
 - UK Power Networks
 - Sutton and East Surrey Water
 - Sussex Police
 - Mobile Operators Association
 - British Telecom
 - BT Plc
 - EMF Enquiries - Vodafone and O2
 - EE
 - Three
 - Homes and Communities Agency
-
- Albourne Parish Council
 - Ardingly Parish Council
 - Ashurst Wood Village Council

- Balcombe Parish Council
- Bolney Parish Council
- Burgess Hill Town Council
- Cuckfield Parish Council
- Ansty and Staplefield Parish Council
- East Grinstead Town Council
- Fulking Parish Council
- Hassocks Parish Council
- Haywards Heath Town Council
- Horsted Keynes Parish Council
- Hurstpierpoint & Sayers Common Parish Council
- Lindfield Parish Council
- Lindfield Rural Parish Council
- Newtimber Parish Council
- Poynings Parish Council
- Pyecombe Parish Council
- Slaugham Parish Council
- Turners Hill Parish Council
- Twineham Parish Council
- West Hoathly Parish Council
- Worth Parish Council
- Adur and Worthing Councils
- Colgate Parish Council
- Lower Beeding Parish Council
- Cowfold Parish Council
- Shermanbury Parish Council
- Woodmancote Parish Council
- Upper Beeding Parish Council
- Chailey Parish Council
- Ditchling Parish Council
- Wivelsfield Parish Council
- Danehill Parish Council
- Forest Row Parish Council
- Fletching Parish Council
- Dormansland Parish Council
- Felbridge Parish Council
- Burstow Parish Council

- Arun District Council
- Brighton and Hove City Council
- Crawley Borough Council
- East Sussex County Council
- Horsham District Council
- Lewes District Council
- Tandridge District Council
- Wealden District Council
- Surrey County Council
- South Downs National Park Authority

Summary of representations

- 3.7 In total, 111 representations were made. All representations received were put into a single table which, given the length, is included in a separate document.
- 3.8 By way of a summary, the most common points made were as follows:
- Disagreement with the spatial strategy in the HKNP and specifically the fact that the quantum of dwellings allocated in the plan does not address the Objectively Assessed Housing Need (OAHN) figure in the MSDC document 'Housing and Employment Development Needs Assessment (HEDNA)', March 2015. This was related back to Objective 3 of the HKNP in respect of meeting Horsted Keynes's housing needs over the plan period. This is addressed in the Justification Paper which accompanies the Submission Version HKNP. However, it was recognised that, although a large site allocation was not considered to represent a sustainable option in the HKNP, a more flexible approach to housing provision was needed. As such, Policy HK1 was amended to allow residential developments of no more than 10 dwellings on sites adjacent to the built up area boundary, provided they did not have a detrimental impact on the AONB and highways and clearly represented sustainable development.
 - Some felt that there was no justification for smaller properties, with few people clearly intending to downsize and few young people interested in living in the quiet village. However, it was considered that the locally collected evidence from the community about the interest in downsizing, coupled with evidence from the Mid Sussex SHMA, justified a policy addressing this.
 - There were many representations made about the various sites allocated and also about the potential to allocate other/larger sites, in particular the 'amalgamated' Sugar Lane sites. The input of WSCC as highways authority was questioned. As a result of this, their input was again sought following the Pre-Submission Consultation (see Section 4) and this further clarified their position in respect of highways impact.
 - Many comments were made about the importance of the AONB. Following these comments and those made by the High Weald AONB Board, an additional policy was included in the Submission Version HKNP specifically requiring that development ensures that development in the AONB does not have a detrimental impact on it.
 - Many commented on the need to allow appropriate small scale residential extensions outside the built up area boundary. Policy HK4 was duly amended to allow this but not to allow infill development outside the built up area boundary, which would be a lot more difficult to define.

4 ENGAGEMENT FOLLOWING PRE-SUBMISSION CONSULTATION

- 4.1 A number of those that made representations to the Pre-Submission Consultation process also considered that the Parish Council had not acted appropriately in taking forward the HKNP. Following a recommendation by the Mid Sussex Standards Committee, the Parish Council employed Lindsey Frost, an independent planning consultant, to provide a report on the HKNP process carried out by the Parish Council up to Pre-Submission Consultation stage. His report was presented at an extraordinary meeting of the Parish Council on 9th August 2016. The report identified a mismatch in the draft plan's vision and objectives and its site allocations policies. It also proposed some further work to be done before making any decision on the way forward.
- 4.2 Four options were presented:
- 1. No additional sites to be included in the plan
 - 2. Identify and include a rural exception site to achieve some affordable housing
 - 3. Agree to try and identify a rural exception site at a later date during the life of the plan
 - 4. Include additional site(s) to achieve higher housing numbers.
- 4.3 The meeting was attended by a large number of residents who had the opportunity to question Mr Frost on his report. The report was published on the PC website ahead of the meeting and is available here: <http://horstedkeynesparishcouncil.com/wp-content/uploads/2016/08/0816-Independent-Experts-Final-Report.pdf>.
- 4.4 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.
- 4.5 At the same time, the other planning consultants supporting the preparation of the HKNP, Troy Navigus Partnership, were asked to review all the representations made at Pre-Submission Consultation stage, and to engage further with WSCC and with the High Weald AONB Board in order to make recommendations regarding possible changes to the HKNP.
- 4.6 WSCC Highways Department also visited the sites to assess any access and transport issues. All sites were reviewed but there were no fundamental changes to assessments that had been made before.
- 4.7 In November 2016, a report was prepared by Troy Navigus Partnership and presented at a public meeting. The report was made available on the Parish Council website a week before the meeting and the meeting itself advertised on the website and social media as well as the Parish Council noticeboard.
- 4.8 The Troy Navigus Partnership report (which can be found here: <http://horstedkeynesparishcouncil.com/np-consultant-report-documents-1116/>) recommended allocation of the amalgamated Sugar Lane site as the safest way of addressing the OAHN issue to the likely satisfaction of an Examiner.
- 4.9 The report was presented by the Troy Navigus Partnership consultant and then residents and councillors had the opportunity to question him. Following discussion, the Parish Council opted not to add the amalgamated Sugar Lane site into the HKNP but to retain the existing site

allocations previously agreed. To address the perceived mismatch between vision and housing allocation numbers, the Parish Council agreed to add a new criteria-based policy to the HKNP to allow new sites for up to 10 homes to be brought forward on land adjacent to the built up area boundary. This was added to an amended Policy HK1.

5 EU OBLIGATIONS

Sustainability Appraisal

- 5.1 Mid Sussex District Council had given clear guidance to all NDP Groups that, if they were proposing site allocations, then an SEA was necessary and that this should be undertaken as part of a full Sustainability Appraisal (SA). This was confirmed in the Mid Sussex Neighbourhood Plans Strategic Environmental Assessment Screening Report June 2013. Accordingly, this assessment has been undertaken and is included as part of the suite of documents submitted to Mid Sussex District Council as part of the Regulation 16 Submission Stage.

Sustainability Appraisal Scoping Report

- 5.2 This was completed in December 2014 and submitted to the Environment Agency, English Heritage (now Historic England) and Natural England for their consultation on 9th February 2015, with an end date of 16th March.
- 5.3 Natural England replied on 4th March 2015 with the following comments:
- Horsted Keynes is surrounded by grade 3 agricultural land. Assuming this settlement is to be the focus of development, then the issue is about the need for green field development weighed against the loss of what may be the best and most versatile. Some consideration of options may be appropriate.
 - The area immediately around the settlement does not include BAP habitats, except for the area to the north which shows as Woodland Pasture and Parkland, nor are there designated habitats close by.
 - The first main concern is impact on Ashdown Forest SPA/SAC, and this may be addressed once the mitigation strategy is finalised and adopted in relevant plans.
 - The second main concern is the impact on the designated landscape. This should be informed by consultation on matters of site selection and the nature and scale of development, with the AONB unit and the use of tools such as LCA and LVIA if needed.
- 5.4 The Environment Agency replied on 2nd March 2015 stating that they were happy to apply standing advice in relation to the Scoping Report.
- 5.5 English Heritage made no comments.
- 5.6 All comments made were duly incorporated into the updated Scoping Report, dated January 2016.

Sustainability Appraisal

- 5.7 Following the updating of the Scoping Report, the SA document itself was prepared. This was published alongside the Pre-Submission Consultation Version of the HKNP in April 2016.
- 5.8 Following the Pre-Submission Consultation, proposed amendments to the HKNP were subjected to the SA process. The SA was duly updated and has been included as part of the Submission Stage suite of documents.

Habitats Regulations Assessment

- 5.9 Following consultation with Natural England, Mid Sussex District Council has undertaken a Habitats Regulations Assessment (HRA) to test whether the Mid Sussex District Plan, in combination with

other plans and projects, is likely to have an adverse effect on the integrity of Ashdown Forest. The HRA report on the District Plan identifies that proposed new housing close to Ashdown Forest is likely to increase the number of visitors to the Forest. Such visitors could increase disturbance to rare, ground-nesting bird populations (in particular the Dartford warbler and Nightjar). The 'Ashdown Forest Visitor Survey Data Analysis' published in September 2010 found that most visitors to the Forest live within 7km of its boundaries (straight line distance). The HRA therefore identified a 7km 'zone of influence' within which new housing developments must counter its effect by putting in place measures which reduce visitor pressure.

- 5.10 All the land in the Neighbourhood Plan area lies within the 7km zone of influence, and therefore new residential development proposed in the Plan must have due regard to the Habitats Regulations. The proposed approach set out in the Mid Sussex District Plan includes providing Suitable Alternative Natural Greenspace sites (SANGs) and Strategic Access Management and Monitoring (SAMM) measures on Ashdown Forest itself.
- 5.11 SANGs are sites that cater for the recreational needs of communities in order to reduce the likelihood of visitor pressure and disturbance on important nature conservation areas. Developer contributions will be required towards the provision of SANGs and the criteria for a site to be suitable as a SANG site is set out on the Mid Sussex District Council website (www.midsussex.gov.uk).
- 5.12 The District Council is responsible for deciding how developer contributions towards the provision of SANGs and SAMM will be calculated and delivered.
- 5.13 The HRA of the Mid Sussex District Plan also assessed the impact of nitrogen deposition on the Ashdown Forest SAC. This included development proposed through the Neighbourhood Plan. The conclusion of the HRA was that there would be no likely significant effects on the Ashdown Forest SAC from the policies in the Neighbourhood Plan.

