



**Mid Sussex District Council
Site Allocations DPD**

Regulation 19 Consultation

Representations on behalf of Sunley Estates Ltd

Site SA28: Land South of The Old Police House, Horsted Keynes

Our ref: AC 215205

18th September 2020

Comments in relation to: Policy SA11 Housing Allocation and Site SA28, Land South of The Old Police House

1. Introduction

- 1.1. Strutt and Parker are instructed by Sunley Estates Ltd to respond to the Regulation 19 consultation Site Allocations Development Plan Document (SADPD) published by Mid Sussex District Council in July 2020. Sunley has recently been appointed by the landowner as the developer and has a legal interest in land at The Old Police House which it is promoting for new housing.
- 1.2. This supporting statement provides further information regarding the deliverability of the site and seeks to support its formal allocation within the emerging Site Allocations Development Plan Document.

2. Spatial Strategy for the District – Horsted Keynes Site Allocations

- 2.1. During the Regulation 18 consultation in November 2019, it was noted that the SADPD under-delivered housing numbers in Category 3 settlements (known as Medium Sized Villages) when assessed against the District Plan targets, proposing 303 units against the required 439 units (an under-delivery of 136 units). In the District Plan, Medium Sized Villages are specifically identified by Mid Sussex DC as settlements that provide essential services for the needs of their own residents and immediate surrounding communities.
- 2.2. It is notable that the Regulation 19 SADPD continues to under-deliver housing numbers in Category 3 settlements when assessed against District Plan targets. The minimum residual requirement for Category 3 settlements has since reduced from 439 to 371, however, only 238 of the minimum 371 homes required are proposed in the Regulation 19 SADPD, still resulting in a shortfall of 133 dwellings.
- 2.3. Although the minimum residual requirement for Category 3 has decreased, this category remains the most underrepresented in the proposed SADPD despite being recognised as sustainable settlements. It is therefore imperative that any current proposed allocations in Category 3 settlements continue to be supported for allocation and the proposed number of units on these allocated sites be accurately assessed to ensure the most efficient use of the land.
- 2.4. The SADPD identifies two sites for allocation within Horsted Keynes, a Category 3 settlement; Land South of St. Stephens Church (Site SA29) and Land South of The Old Police House (Site SA28). These were identified as the sites within Hortsed Keynes that would have least overall impact on the AONB and confirmed in March 2020 as not being Major Development in the High Weald Area of Outstanding Natural Beauty (AONB). Between them, the two sites are identified by the Council as being able to provide 30 units and 25 units respectively. These allocated sites have the confirmed support of Horsted Keynes Parish Council and have been agreed for inclusion in the emerging draft Horsted Keynes Neighbourhood Plan.

- 2.5. The number of units identified for the Land South of The Old Police House during stage 2 of the SHELAA in April 2019 was originally assessed as 30. This was later reduced during the Regulation 18 draft of the SADPD to 25 units. Despite submitting evidence during the Regulation 18 consultation regarding the site capacity, the number of units proposed by the Council for this site remains at 25.
- 2.6. It is not clear in the Site Selection Paper 3 or on the latest version of Draft Policy SA28, why the number of units was reduced and subsequently has remained at 25, however, it is understood that the reduction of 5 units was anticipated as a result of the scale of the landscape buffer required to the north east corner of the site. This reduction in numbers by MSDC has not, at any stage, been explained in writing or supported by any detailed technical work.
- 2.7. It is our recommendation that any Policy wording to read either 'approximately 25 units' or 'circa 25 units' in order to remove any unnecessary cap allowing the use of the site to be maximised and to contribute towards the Council's continued shortfall of housing in Category 3 settlements.
- 2.8. An indicative layout was submitted to the Council in June 2020, which indicates how the site could accommodate 30 units, compliant with the Council's recommended housing mix policy and using evidence published in the Horsted Keynes Housing Needs Survey available on the Horsted Keynes Parish Council. The example layout takes into account a positive active frontage, trees and access as required. This plan is continuously being developed and ongoing detailed and technical work is being undertaken to inform a further iteration.

3. Site Allocation SA28 – Land South of The Old Police House

- 3.1. Sunley is a well-established house builder with an excellent track record of housing delivery, and are presently building homes in Mid-Sussex to house local families. They are committed to bringing this opportunity forward within the next 1-5 years. They are in contact with the Horsted Keynes Community Land Trust and are committed to exploring all options to ensure that the correct provision and mix of affordable housing can be both provided, and delivered on site. A significant library of supporting technical studies for the site have already begun to take place.
- 3.2. Detailed drawings identifying a suitable point of access onto Birchgrove Road including sufficient visibility splays, have been prepared and verified through discussion with West Sussex County Council Highways in July 2017 and subsequent discussions in October 2019. These studies confirm that safe access can be achieved and the existing Oak Tree along the frontage can be retained.
- 3.3. A preliminary ecology assessment does not identify any constraints that would preclude development.
- 3.4. A Landscape Character and Visual Appraisal report was prepared in October 2017. This was more recently updated with a full Landscape and Visual Impact Assessment in March 2020. Both concluded that whilst the character and appearance of the northern part of the site itself would change from pasture land, there is the potential to set new development within a robust green framework, allowing it to be integrated into the existing village without resulting in

- unacceptable adverse effects or causing any substantial landscape impact beyond the site's boundaries. This small extension to Horsted Keynes is within an enclosed field framework below the skyline and is not out of keeping with the characteristic high ground settlement pattern. It concludes that a development of 'up to 30 units' would not result in undue adverse effects on the wider landscape of the AONB or on Horsted Keynes.
- 3.5. An early version of the illustrative site layout plan has a landscape led design and seeks to ensure the delivery of high quality and mix of housing that respects the character of Horsted Keynes whilst offering an appropriate transition to the wider High Weald AONB. This is an indicative drawing only at this stage but presents scenario for 30 dwellings and indicates how a possible site layout would allow for retention of the mature trees and hedgerows along the boundaries of the site.
- 3.6. The Reg 18 draft policy indicated that a 'sufficiently sized' landscape buffer to the north eastern corner of the site should be provided as appropriate mitigation to protect the setting of the nearby Grade II listed Lucas Farm. An initial Heritage Impact Assessment was therefore completed in January 2020 to investigate this. The report concludes there is a less than substantial harm to Lucas Farm with the retention of the existing vegetation acting as a suitable buffer. The report does not identify any reason for the requirement of further landscaping in this location to act as mitigation for the Heritage Asset. The identified harm would remain as less than substantial regardless of an increase in size to the existing buffer.
- 3.7. The current allocation broadly requires a higher density development towards the 'northern part' of the site and to have a 'positive active frontage'. This is supported given that there is evidence that the north eastern corner of the site was previously subject to built form. Technical reports have evidenced that the relationship with Birchgrove Road and Lucas Farm can be achieved successfully with the retention of the existing boundary and a reduced, but well-designed landscape buffer. We are therefore of the opinion that the wording of an allocation should not specifically request a further landscape buffer in relation to the Heritage Asset, but instead the retention of a suitably planted boundary. This requirement is already covered more generally within the draft Policy.
- 3.8. We are aware that there are other constraints that need to be considered on the site including SUDs and the PROW as well as additional landscaping. It would therefore be appropriate to have flexibility with the number of units if more units were found to be achievable, in order to ensure the most efficient use of the land. We would therefore again suggest a policy wording of 'approximately 25 units' or 'circa 25 units'. This would allow for more (or less) than 25 units to come forward depending on what is found to be appropriate.
- 3.9. The current urban design principles of the SADPD encourages the site to bring forward pedestrian and/or cycle links. In particular, the current allocation requests that the character of the existing public footpath 9HK be retained and integrated into Green Infrastructure in the proposal. Following the Landscape and Visual Impact Assessment in March 2020, it was accepted that the character of a small section of the existing footpath would be changed, however, a 'sequence' of native hedgerows could be supplemented with small, native trees to provide a natural route between the field beyond and house boundaries on Birchgrove Road to mitigate the impact. This is currently being worked into the latest illustrative design. It would be

impossible to retain the current character of this section of the footpath in its entirety. We would suggest that any wording relating to the retention of the 'existing character' of the footpath be re-worded to acknowledge this. Whilst this pedestrian link will be retained, any cycle access would need be provided on the highways, and as such we would request that the allocation does not stipulate separate cycle links on this constrained site.

4. Summary

- 4.1. Sunley Estates Ltd have prepared an illustrative layout plan which allows for an appropriate mix of high quality dwellings which integrate into and reflect the design character of Horsted Keynes, whilst retaining the mature trees and hedgerows along the site boundaries and offering an appropriate transition to the wider High Weald AONB. This illustrative plan is subject to ongoing development but has already provided an example of a scheme which shows compliance with the current site allocation SA28 of Policy SA11 of the draft Site Allocation Development Plan Document.
- 4.2. It is evident from the figures published in the Regulation 19 SADPD that there remains a significant shortfall of homes in sustainable Category 3 settlements across the District. It is imperative that the Council seek to support and maximise the use of this allocated site in order to contribute towards the Council's shortfall of housing in this category.
- 4.3. Following the provision of evidence through further technical studies, it is not considered necessary to specifically stipulate a provision of a dense landscape buffer in the north eastern corner specifically for the protection of the identified heritage asset at Lucas Farm. The draft policy already indicates that consideration should be given to retain important trees and hedgerows along the boundaries of the site. This, along with a well-designed planting scheme along this section of the boundary would result in the retention of a suitably sized buffer.
- 4.4. We would suggest a policy wording of 'approximately 25 units' or 'circa 25 units'. This would allow for more (or less) than 25 units to come forward pending further technical studies.
- 4.5. The appointment of Sunley as a developer on site is confirmation of the commitment to bring the site forward within 1-5 years of adoption of the plan. There is no reason why a planning application could not come forward immediately following the adoption of the SADPD.
- 4.6. We therefore support the continued allocation of the site. Further detail can be provided on request.