

Site	Sites in Horsted Keynes
MIQ concerned	Matter 1 - Legal Requirements, Scope of the Local Plan and Duty to Cooperate 1.2 Scope of this part of the Local Plan (iii) Does policy SA GEN adequately set out the general principles for the Site Allocations that are made in this Plan?
Part of document deemed to be unsound	SSP3 including Appending B Allocations in Horsted Keynes – SA28 and SA29
Soundness criteria	Fails on: Justified (positively prepared / justified / effective / consistent with national policy)
New Information available	New information has become available following Reg 19 consultation in Dec 2020, notably the submission of a planning application (DM/20/4692) for SA29 (application validated Jan 2021).
Reasons for failure	<p>Policy SA GEN does set out the general principles for the Site Allocations that are made in this Plan, however the implementation of SA GEN has not been consistent and as such the site allocation DPD fails the soundness test on justification.</p> <p>The allocation of sites should be more dependant on the contents of SA GEN, and their allocations should be <u>contingent</u> on fulfilling the elements of SA GEN. From the allocations that I know in detail this is not occurring (e.g. SA28 and SA29).</p> <p>This statement is a ‘place holder’ as I have specific elements of the SSP3 process that I have made statements on for other parts of the hearing. Please consider this statement in conjunction with my detailed statements on MIQ section 1.1 (Due process), MIQ section 2.2 (SA and realistic alternatives), MIQ 2.3 (Significant mitigation), three parts of MIQ 3.3, (ii), (v), and (vii), relating to site SA29, and finally MIQ 6.5 (Highways improvements).</p> <p>I outline below the areas of concern I have for specific sites below, but these concerns may be transferrable to other allocated sites, where the SA GEN policy is not being implemented adequately to result in sustainable development of sites. The below follows the policy subheadings:</p> <p><i>Key Objectives:</i></p> <ul style="list-style-type: none"> • <i>Contribute towards necessary infrastructure provision DP20: Securing Infrastructure</i> <p style="padding-left: 40px;">Site SA29 access and associated vehicle movement has a severe impact on the safety of local road network, notably the western end of Hamsland, a single-track access to nearly 120 homes. No solution to this cumulative impact on the infrastructure has been secured as part of the allocation process and more extensive highways improvements are needed to deliver this site safely.</p> <p><i>Urban design principles:</i></p> <ul style="list-style-type: none"> • <i>Design new development at a density that is appropriate for the location</i> • <i>Create safe communities through appropriate design and layout that reduces the likelihood of crime and anti-social behaviour.</i> <p style="padding-left: 40px;">The density of proposed developments of site SA29 (30 homes in 1.13ha) does not reflect the edge of village location especially as the site is in an AONB. It is overdevelopment. This has become apparent following a planning application DM/20/4692 detailing the layout and associated impacts. This will impact the local community and also the biodiversity of what is currently a green field – no impactful mitigation is possible for the loss of biodiversity on the site due to the high density being proposed.</p>

The safety aspects of the development of SA29 on the local community by the single-track access is addressed above. No solution to improve safety of residents using the access of Hamsland has been secured as part of the allocation process.

Landscape considerations

• *Arboricultural Impact Assessment and Arboricultural Method Statements will be required for all sites where development will be within 5 metres of any trees.*

The narrow and only available access to Site SA29 passes within 2 metres of a whole line of mature trees, yet no impact assessment has been required for its allocation – given access is a critical element of the development of the site this should be considered a constraint on the access and the site should not be allocated until appropriate **guarantees for tree protection** is obtained, or an **alternative access is proposed**. The guaranteed protection of the trees on this site should be a condition of allocation.

Historic environment and cultural heritage

• *Respect listed buildings, conservation areas, scheduled monuments, registered parks and gardens and their settings and look for opportunities to enhance or better reveal their significance. All heritage assets, including those that are undesignated, will need to be conserved and enhanced.*

For site SA28, little heed has been given to the close proximity (20m) and the direct line of sight from the site to the listed building 'Lucas farm'. No respect has been paid to the listed building itself, or the former agricultural buildings (now demolished but previously on site SA28) that were associated with the listed building previously.

Biodiversity and Green Infrastructure

• *Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity*

• *Green Infrastructure is to be incorporated with SuDS, where possible, to improve biodiversity and water quality.*

Site SA29 is over developed and there is no space left on site to give meaningful areas over to the wildlife, so no net gain can be achieved. The site promoter is suggesting subsurface tanks for drainage, and not a sustainable SUDS system - again because the site is over developed. No substantive mitigation has been suggested as part of the allocation for drainage or biodiversity gain.

Access and highways

• *Provide a Transport Assessment and Sustainable Transport Strategy to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it.*

• *Safeguard Public Rights of Way (PRoW) and protect their amenity.*

SA29 has severe impact on the local transport network, and the information in the supporting more limited Transport Statement (SA29.4) is lacking accuracy. No mitigation to the impact on the restricted access to the site along the western portion of Hamsland has been addressed. No mitigation has been suggested as part of the allocation – this should be a condition on allocation.

SA28 contains a PROW going through the centre of the site, but no meaningful mitigation has been suggested as part of the allocation.

Flood risk and drainage

• *Priority will be given to use of Sustainable Urban Drainage Systems (SuDS) principles and methods where possible to drain the surface water from the development.*

Site SA29 is over developed and there is little space on site to provide a sustainable SUDS system (as demonstrated by the planning application DM/20/4692).

Utilities

	<ul style="list-style-type: none"> • <i>Demonstrate that there is adequate water supply capacity and/or waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users</i> Horsted Keynes suffers from a poor water supply – the main line in to the village along Keysford Lane is ruptured at least 4 times a year. A new main is needed. No mitigation for the extra use of this main has been suggested as part of the allocations in Horsted Keynes. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • <i>Design development to be resilient to climate change, minimise energy and water consumption</i> • <i>Address sustainability at the conception stage of development proposals to exploit the benefits of passive design and orientation, fabric performance, energy efficiency measures and low carbon solutions; and wherever possible include on-site low or zero carbon technologies</i> <p>The new application DM/20/4692 on Site SA29 shows very little heed is paid to the principles of sustainability – Calor gas is proposed as a heating source, there is no design consideration to solar gain, no sustainable SUDS application, and the sustainability assessment is non-committal to most of sustainability elements, e.g. ‘The following measures <u>can</u> be applied to the development’ – the commitment of ‘will be applied’ is lacking throughout the document. Solar panels are not even suggested.</p> <p>Many of these comments have been made to MSDC through representation to the SA29 planning application. All be it that application is running in a different process to the Site Allocation DPD, the draft allocation of the site without sustainability <u>preconditions</u> attached to the allocation have enabled the site promoter to ‘try their luck’. This is not promoting a sustainable future for the district and more heed should be paid to the true implementation of SA GEN.</p> <p>Please also refer to my representations to the hearing on site specific issues with the SA GEN policy, specifically for SA29. Other sites in Horsted Keynes have not been compliant with the SA GEN policy either, so I assume other allocations may be seen to be ‘apparently’ sustainable, but in reality are not able to fulfil the General Sustainability policy objectives.</p>
Reference to other DPD documents	DPD1
How could the document be made sound?	For sites to be allocated it should be a condition that SA GEN policy is followed and specific conditions should be made in the allocation if sustainability issues are raised in consultations or through the selection process. The voice of representations made during consultations has not been reflected in the policy allocations, and comments are not addressed or mitigated in the proposed allocations.
What is the precise change that is sought?	I seek changes for specific sites, where SA GEN principles have not been followed. This is not the subject of this section of the hearing, so I will raise the specific matters of concern and the changes I seek during the site-specific hearings (SA28 and SA29).
Appendices	