

Site	Site 68: Farm buildings, Jeffreys Farm, Horsted Keynes
MIQ concerned	<p>Matter 3 – Does the Plan deliver both the quantitative and qualitative aspects of housing provision in the District Plan to meet Mid Sussex’s requirements over the plan period in accordance with national policy?</p> <p>3.2 Proposed Distribution of new homes: Does the proposed distribution of the additional new homes in the allocations in the Plan (as set out in table 2.5) to meet the Minimum Residual Housing Requirement, accord with the principles of sustainable development, particularly as set out in policies DP4 to DP6 of the District Plan, including taking account of considerations such as: (iv) Maximising the re-use of previously developed sites which are sustainably located</p>
Part of document deemed to be unsound	<p>SSP3 Site Selection Process: Housing including Appendix B.</p> <p>In summary: Stage 3 of the site selection process and the resultant sustainability assessments and reasonable alternative comparisons leading to unjustified site allocations in Horsted Keynes, excluding what is essentially a previously developed site.</p>
Soundness criteria	<p>Fails on: positively prepared and justified, and consistent with national policy (positively prepared / justified / effective / consistent with national policy)</p>
New Information available	
Reasons for failure	<p>Horsted Keynes lies wholly within the High Weald AONB. Two sites have been allocated in the village as part of the site allocations DPD. The allocation of the two green field sites (SA28, and SA29) of medieval origin, for 25 and 30 houses respectively is <u>not justified</u> and as other <u>previously developed sites</u> have been ignored which could have provided a highly sustainable alternative.</p> <p>This statement should be read in conjunction with my other representations made to the hearing, most notably: MIQ 1.1(ii) – regarding a lack of due process being followed for the site selection process for Horsted Keynes; MIQ 2.2 – regarding the failure of the use of realistic alternatives to inform the SA in Horsted Keynes, and MIQ 4.2 – regarding small scale sites in the AONB</p> <p>Site 68 is 0.75ha of dilapidated farm buildings. The site should be considered as Previously Developed Land as it is adjacent to existing housing, contiguous with the village, currently occupied by dilapidated farm buildings and as such an obvious candidate for sustainable development in accordance with MSDC Local Plan Policy DP4, and also potential for a small-scale development within the AONB as part of DP16. It is one of only two sites in HK assessed as Low AONB impact (for up to 18 houses), and is also adjacent to modern field systems to the north and east. A well-designed layout adhering to the AONB Management plan could deliver a unique development (see promoters vision in Appendix 7) especially when replacing existing built form with similar scale and vernacular.</p> <p>As such site 68 would seem to be a good candidate for allocation, and also to fulfil the NPPF and district policies. However, the site was screened out at the Stage 3 assessment due to perceived access issues. The access assumptions are based on two <u>factually incorrect</u> conclusions (<i>‘significant conflict with the existing junction (creating a crossroads)’</i> and <i>‘third party land ownership’</i> restricting visibility). This has been highlighted on several occasions prior to MSDC Reg 18 and Reg 19, but no attempt was made to change this qualitative information. This is part of a due process statement supplied for the hearings under MIQ 1.1 (ii), suggesting the site should not have been screened out of the process, and should have progressed to be a realistic alternative to be tested by the SA.</p> <p>There is no evidence-based reason, or apparent rational professional judgement reason for excluding Site 68: Jeffreys Farm Buildings at Stage 3, that then prevents its consideration at the SA stage as a previously developed site, and also small-scale development in the AONB. This appears to be a highly sustainable site for the proposed scale of development and its exclusion appears to be <u>perverse and untenable</u>.</p> <p>The screening out of site 68 has been challenged on several occasions through regulation consultations over several years (See MIQ 1.1 (ii) statements), highlighting the lack of due process</p>

	<p>in the decision to not take it forward to be assessed as a realistic alternative site. MSDC has given NO response in the Consultation reports to these comments made about Site Selection Paper 3, an absolutely critical screening step in this stage of the process. How can it be tenable that these critical judgements to screen out sites from the process are subject to no scrutiny and no further justification by MSDC when valid comments are raised through consultation? Site 68 is a highly sustainable site capable of delivering a highly favoured small-scale development in the AONB on previously developed land.</p> <p>In summary, the allocation of sites in Horsted Keynes (SA28 and SA29) does not adequately fulfil the NPPF, or district plan policies (DP6) as it provides <u>little provision for the protection and enhancement of its environment, landscape, or biodiversity</u>. Given the importance of Areas of Outstanding Natural Beauty (AONB) as a national policy constraint the allocation and more specifically the housing number proposed for allocation is not justified in the AONB especially. The SSP3 selection process has however screened out a previously developed site that is also a highly sustainable site (68) that is appropriate for a <u>highly desirable ‘small scale’ proposal in the AONB</u> which is not only of low impact to the AONB but would also fulfil policy DP16. Given the site has extensive existing built form, it is a highly sustainable option and could maintain that sustainability whilst providing additional numbers to the 6 houses proposed in the SADPD. process.</p>
<p>Reference to other DPD documents</p>	<p>DPD1 DPD5 NPPF High Weald Management Plan - O4 Site selection Paper 3 – SSP3 (both Housing, and Appendix B site proformas)</p>
<p>How could the document be made sound?</p>	<p>Specific to Horsted Keynes the site allocations should be scrutinised Site 68: Jeffreys Farm Buildings should be reassessed at stage 3 of the Site selection process as it is principally a previously developed site and as such is highly sustainable, and it fulfils DP16 being a small-scale proposal which would have a low impact on the AONB. The reuse of previously developed land would be compatible with the conservation and enhancement of natural beauty of the AONB, making the site highly sustainable.</p>
<p>What is the precise change that is sought?</p>	<p>Site 68 Jeffreys Farm Buildings should be considered for allocation by the inspector. Alternatively, as the Parish Council have withdrawn support for the site selection DPD, the inspector could withdraw the allocations for Horsted Keynes from the DPD and allow the Parish Council to allocate sites to fulfil DP6 housing numbers for the village.</p>
<p>Appendices</p>	<p>Appendix 7 – Aspiration images for the development style and form of Site 68 Jeffreys Farm buildings AS ATTACHMENT TO EMAIL</p>