



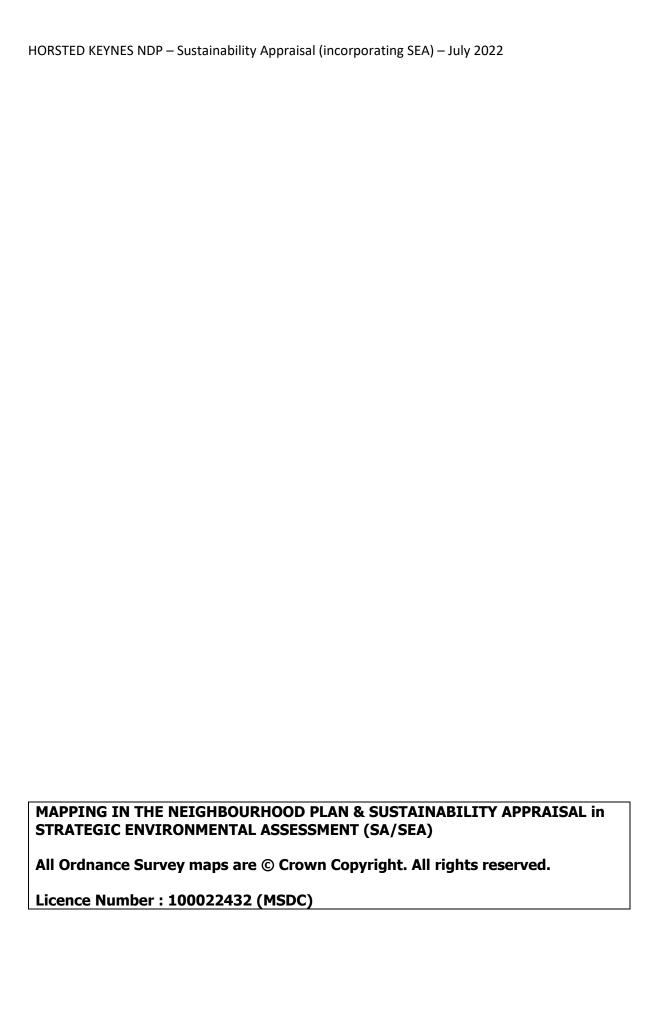
HORSTED KEYNES NEIGHBOURHOOD DEVELOPMENT PLAN

SUSTAINABILITY APPRAISAL (incorporating Strategic Environmental Assessment)

Published by Horsted Keynes Parish Council under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended)

July 2022

Approved by HKPC at EGM 19th July 2022



CONTENTS

1.	INTRODUCTION	0
2.	METHODOLOGY	3
3.	POLICY CONTEXT	7
4.	PARISH CHARACTERISTICS AND ISSUES	8
	Nature conservation	8
	Landscape	9
	Water	10
	Soils and Geology	11
	Heritage	11
	Air and Climate	13
	Human characteristics	13
	Roads and transport	14
	Infrastructure	14
	Economic characteristics	15
5.	KEY SUSTAINABILITY ISSUES	. 16
	SWOT analysis	16
	Key issues	16
6.	OBJECTIVES OF THE SUSTAINABILITY APPRAISAL	. 18
7.	SUSTAINABILITY OBJECTIVES	. 19
8.	ASSESSMENT OF NEIGHBOURHOOD PLAN OBJECTIVES & POLICIES.	.21
9.	CUMULATIVE EFFECTS OF NEIGHBOURHOOD PLAN POLICIES	.40
10	OVERALL CONCLUSION	. 41

APPENDICES

Appendix A Summary of responses from statutory bodies during SA

scoping process

Appendix B Summary of relevant plans and programmes

1. INTRODUCTION

Background

- 1.1. The Horsted Keynes Neighbourhood Development Plan (NDP) is being prepared in accordance with the Neighbourhood Planning Regulations 2012 (as amended). The NDP has been prepared to establish a vision for the future of the parish and to set out how that vision will be realised through managing land use and development over the plan period 2014 to 2031.
- 1.2. An earlier draft NDP was submitted to MSDC in November 2017 but was subsequently withdrawn following advice from the appointed Examiner in June 2018. Towards the end of 2018, HKPC decided to revise and update the plan to address the issues identified by the Examiner. The earlier November 2017 plan was accompanied by a Sustainability Appraisal (incorporating a Strategic Environmental Appraisal), Final Report, dated October 2017. Hereafter called the "2017 SA document").
- 1.3. A revised draft NDP was prepared for consideration by the Parish Council in March 2020, prior to public consultation (Regulation 14). This required an updated Sustainability Appraisal (incorporating SEA) to guide evaluation of policy options and the potential allocation of any development sites not provided by the MSDC Site Allocation DPD. Progress on the Site Allocation DPD means that no additional sites need to be allocated in Horsted Keynes. As a result, the site-specific elements of the earlier versions of the Sustainability Appraisal are no longer relevant and have been deleted from this revised document. It is arguable that, as a result, the potential for significant sustainability effects had been removed and no further appraisal work would be necessary. However, having embarked on this exercise, the Parish Council decided not to abandon it as the late stage and it has progressed it to submitting a final report, focusing on an appraisal of the Policies set out in the NDP in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.
- 1.4. The overall aim is to produce a plan which contributes to the achievement of sustainable development in the parish. This document fulfils that role in updating earlier work, in particular:
 - a) addressing the issues raised by the Examiner on the earlier November 2017 draft plan
 - b) taking into account the updated National Planning Policy Framework (July 2021), the adoption of the Mid Sussex District Plan 2014-2031 (March 2018) and various MSDC supplementary planning documents (July 2018), and the Site Allocations Plan DPD (June 2022)
 - c) gathering and assessing new information which has become available on social, economic and environmental conditions in Horsted Keynes which will affect the sustainability of the different planning policy choices available to the HKNP
 - d) responding to changes made to the Policies following the Regulation 14 consultation and comments received on the Draft SA/SEA report.
- 1.5. This document sets out the baseline information on the parish, the plans and policies influencing the production of the Horsted Keynes Neighbourhood Plan, current sustainability issues that are facing the parish and the sustainability objectives that the Neighbourhood Plan should strive to achieve. The consultation responses to the Sustainability Framework Scoping Report published by Horsted Keynes Parish Council in January 2016 have been taken into account when preparing the final sustainability framework on which to test the emerging policies. Where necessary, further assessment of the options has been undertaken, along with any updating of baseline data, plans and policies.

- 1.6. The sustainability objectives identified in the 2017 SA document were the subject of consultation with Mid Sussex District Council, the Environment Agency, Natural England and Historic England between January and March 2015. The objectives set at that time were amended to take account of the advice and comments received. A summary table of the comments from consultees is contained in Appendix A.
- 1.7. The earlier draft Sustainability Appraisal was the subject of consultation in April and May 2016 alongside the Pre-Submission Neighbourhood Plan (Regulation 14) and was amended in the light of representations received at that time. The objectives set at that stage will continue to form the basis for the sustainability appraisal of the objectives of and **planning policies** in the HKNP. A draft version of this report was also subject to a further Regulation 14 consultation.
- 1.8. With the passage of time since the earlier Sustainability Appraisal was prepared in 2016-17, the strategic planning policy position in Mid Sussex has progressed with the adoption of the Mid Sussex District Plan 2014-2031(March 2018) and several supplementary planning documents to amplify and explain the application of key policies (July 2018) and the adoption of the Site Allocations Development Plan Document (June 2022).

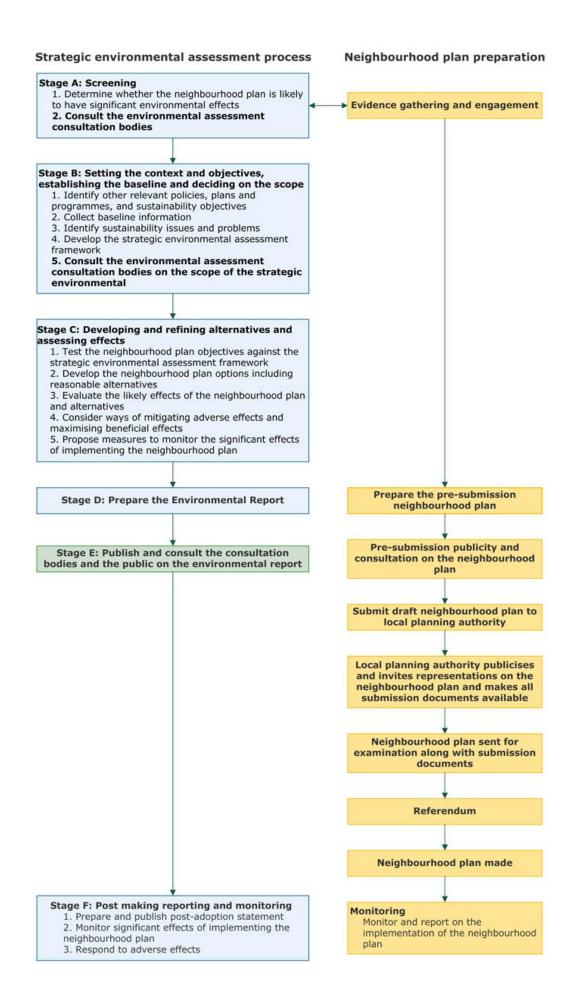
Sustainable development

- 1.9. The commitment to the achievement of sustainable development has been set out in legislation introduced at both European and national level. In 2004 the European Directive on Strategic Environmental Assessment (Strategic Environmental Assessment) was implemented in the UK. This sets out the requirement for Strategic Environmental Assessment. Section 39 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development.
- 1.10. Sustainable development is about ensuring a better quality of life for everyone, now and for generations to come. It is about considering the long-term environmental, social and economic issues and impacts in an integrated and balanced way. The UK Government has set five guiding principles to achieve the sustainable development purpose. These principles form the basis for policy in the UK and are as follows:
 - Living within environmental limits
 - Ensuring a strong, healthy and just society
 - Building a strong, stable and sustainable economy
 - Promoting good governance
 - Using sound science responsibly.
- 1.11. One of the means by which sustainable development can be achieved is through the land-use planning process. The role of the planning system in delivering sustainable development is set out in paragraphs 7-8 of the National Planning Policy Framework 2021 where it states:
 - 7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations including the United Kingdom have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection
 - 8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **an economic objective** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 1.12. The Horsted Keynes Neighbourhood Plan will need to be in general conformity with the Mid Sussex District Plan 2014-2031. If approved by a referendum, the Neighbourhood Plan will then become a part of the development plan for the parish of Horsted Keynes.
- 1.13. The Horsted Keynes Neighbourhood Plan can help to achieve sustainable development as it aims to ensure that development meets the social and economic needs of people living and working in the parish, whilst at the same time helping to ensure that any adverse environmental impact is minimised.

2. METHODOLOGY

- 2.1. Through the SA/SEA are tested social, environmental and economic effects of the Neighbourhood Plan to ensure that they promote sustainable development, and the Neighbourhood Plan avoids causing any significant environmental effects. The combined process involves a simple evaluation of the social, economic and environmental impacts of the plan.
- 2.2. The methodology for the assessment is intended to be proportionate to the task of assessing the modest proposals of a Neighbourhood Plan in a relatively small rural area. A summary of the process, as derived from Planning Practice Guidance Flowchart Paragraph: 033 Reference ID: 11-033-20150209, is presented below.



- 2.3. The Horsted Keynes Neighbourhood Plan covers the whole of the parish of Horsted Keynes (see Figure 1.1). It has been prepared by a Steering Committee comprising members of Horsted Keynes Parish Council and volunteers from the community. To inform the SA/SEA, data was collected about Horsted Keynes on a wide range of matters.
- 2.4. The majority of the district-wide data has already been collected for the Sustainability Appraisal for the Mid Sussex District Plan and has been obtained from the various sources best placed to provide accurate data in their relevant area of expertise. This information has enabled the environmental, social and economic issues facing both the district and Horsted Keynes to be established.

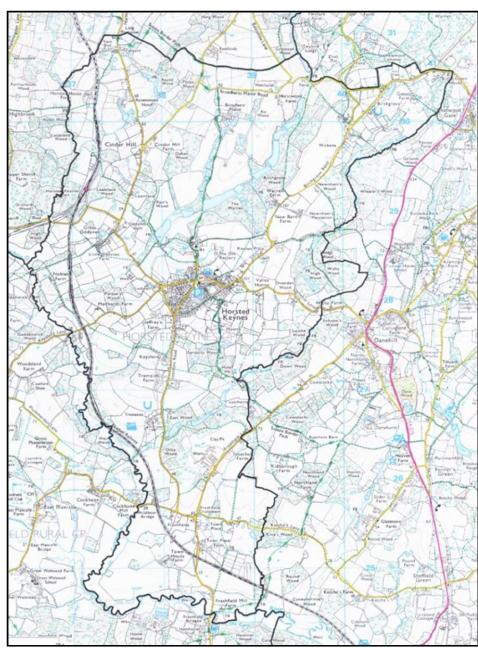


Figure 1.1: Horsted Keynes Neighbourhood Plan designated area

- 2.5. The Horsted Keynes Neighbourhood Plan has been developed through an extensive programme of engagement with the local community. This included developing the following vision for the development of the village and parish up to 2031:
 - '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.'
- 2.6. Mid Sussex District Council published its Submission District Plan, together with its Sustainability Appraisal report, in August 2016. The District Plan Sustainability Appraisal identifies 18 sustainability objectives, and these were carried through into the plan which was eventually formally adopted in March 2018. The Horsted Keynes NDP SA/SEA developed its own 11 sustainability objectives, based upon the sustainability objectives in the then emerging District Local Plan work. Local issues and objectives were identified, and the indicators used to measure these are from local sources at a local scale wherever possible. These helped the assessment of the sustainability issues facing Horsted Keynes parish that are addressed in the Neighbourhood Plan. The Sustainability Objectives are set out in section 7 and these were used for appraisal of planning policy choices within the NDP.

3. POLICY CONTEXT

- 3.1. The Horsted Keynes Neighbourhood Plan is being prepared in accordance with national and local planning policies. At the national level, the **National Planning Policy Framework** (NPPF) 2021 establishes the scope and purpose of neighbourhood plans in England. At the local level, the development plan currently comprises the Mid Sussex District Plan 2014-2031, together with a subsequent development plan document (DPD) and a number of supplementary planning documents (SPDs) which amplify policy guidance for particular parts of the district plan. The West Sussex Waste Plan (2014) and the West Sussex Joint Minerals Plan (2018) also form part of the development plan (see Appendix B)
- 3.2. **The Mid Sussex District Plan 2014-2031**, adopted by MSDC in March 2018, provides the strategic planning context for this Neighbourhood Plan. The Plan sets out a vision for how Mid Sussex wants to evolve up to 2031 and a delivery strategy for how that will be achieved. As such, it sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies together with policies for the protection and enhancement of important features of the local environment.
- 3.3. The District Local Plan's overall planning strategy for Mid Sussex includes the overall amount of new residential development up to 2031 and a settlement hierarchy to indicate how it will be spread across the district. It also identifies several large-scale strategic development allocations. Allocation of smaller sites is left to the **Site Allocations Development Plan Document (DPD),** prepared by MSDC, and/or Neighbourhood Plans prepared by town and parish councils. The finalised DPD includes proposals for two housing development allocations in Horsted Keynes. This is described in more detail in section 9 of the Neighbourhood Plan.
- 3.4. Mid Sussex District Council adopted three Supplementary Planning Documents (SPDs) in relation to developer obligations (including financial contributions) on 25 July 2018. These documents amplify policies in the District Plan (particularly DP20 and DP31) and explain how they will be applied in detail. The Development Infrastructure and Contributions SPD sets out the overall framework for planning obligations. This SPD has been updated (October 2019) to reflect the requirements of certain infrastructure (West Sussex County Council (Highways), the NHS Clinical Commissioning Group and Sussex Police). The Affordable Housing SPD provides detailed information on the requirements for on-site and off-site affordable housing provision. The Development Viability SPD provides information on the viability assessment process.
- 3.5. The **Mid Sussex Design Guide** is intended to inform and guide the quality of design for all development across Mid Sussex District. It sets out a number of design principles to deliver high quality, new development that responds appropriately to its context and which is inclusive and sustainable. It was adopted as an SPD in 2020.
- 3.6. Appendix B provides a summary of the other programmes, plans and other documents which influence the Horsted Keynes Neighbourhood Plan. Key objectives and indicators have been identified from the District Plan and these have been incorporated into the sustainability framework and used to inform baseline data and the identification of key issues.
- 3.7. The aims, objectives and indicators from these policy documents have been used to develop the sustainability objectives. The policy context for the Neighbourhood Plan SA/SEA is not static. Therefore, as further relevant plans or programmes are developed, they will be reviewed and taken into account.

4. PARISH CHARACTERISTICS AND ISSUES

Nature conservation

- 4.1. The rural and relatively unspoilt landscape and the presence of a significant amount of ancient woodland provides the area with a rich conservation and biodiversity resource.
- 4.2. Figure 4.1 provides a map of the environmental features of the area. This shows that the parish has two SSSIs, together with several significant areas of ancient woodland and priority habitats.

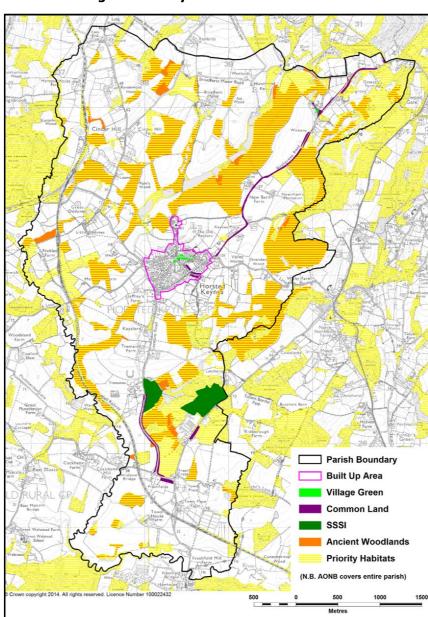


Figure 4.1: Key environmental features

Species

- 4.3. The whole parish is a breeding area for corn bunting birds, a rare and declining farmland bird. They are increasingly now nesting in grass silage fields where they are especially vulnerable to harvesting operations.
- 4.4. The south-western and north eastern parts of the parish are breeding areas for lapwings. This farmland bird has suffered significant declines in recent years and is now a Red List species.
- 4.5. Most of the parish is a breeding area for turtle doves which has seen a rapid and sustained population decline. One cause of the decline is thought to be lack of seed and grain as food during the breeding season, resulting in a much shorter breeder season with fewer nesting attempts. The species is now included on the Red List of conservation concern.
- 4.6. Large parts of the parish are priority habitats for deciduous woodland.

Ashdown Forest

- 4.7. The parish is within 7 kilometres of the Ashdown Forest which provides further convenient and rich landscape for flora and fauna and for leisure activities. The proximity of the Ashdown Forest, which is a Special Protection Area (SPA) and a Special Area of Conservation (SAC), means that the parish has additional environmental considerations and obligations.
- 4.8. The potential effects of development on Ashdown Forest were assessed during the HRA process for the Mid Sussex District Plan. The screening exercise carried out late in 2007 and early 2008 found likely significant effects on the Ashdown Forest SPA as a result of increased recreational activity arising from new residential development and related population growth that is likely to disturb ground nesting birds. It was ascertained that the majority of visitors came from within 7 kilometres, and therefore a 7km zone of influence was the area where measures to reduce recreational pressure would be most effective. As a result, residential development leading to a net increase in dwellings will need to contribute to an appropriate level of mitigation. This is in the form of providing Suitable Alternative Natural Greenspace (SANG), either on the development site itself or through financial contributions towards a strategic SANG, and a separate financial contribution towards a Strategic Access Management and Monitoring (SAMM) Strategy.
- 4.9. A strategic SANG for the District has been secured at East Court and Ashplats Wood in East Grinstead and a series of enhancement works will help to make the site more attractive to visitors. Work with the other affected local authorities (Wealden District Council, Lewes District Council and Tunbridge Wells Borough Council) on a joint SAMM strategy is currently in progress, although the District Council is currently implementing an interim SAMM mitigation strategy -prepared in consultation with Natural England applicable to relevant planning applications. Policy DP17 of the District Plan provides a planning policy basis for assessing the impact of development proposals on Ashdown Forest.

Landscape

- 4.10. Horsted Keynes is a rural parish in the very eastern part of Mid Sussex district. It is entirely covered by the High Weald Area of Outstanding Natural Beauty (AONB). This is a statutory designation which recognises the national importance of this landscape.
- 4.11. The parish sits within the High Weald landscape character area, defined by its wooded ridges and valleys. This classification is further subdivided by capacity and Horsted Keynes parish contains the following landscape capacity areas:

- Oddynes High Weald low landscape capacity. This covers the majority of the parish.
- Horsted Keynes High Weald low/medium landscape capacity. This covers a relatively small part of the southern and eastern part of the parish.
- 4.12. A 'Low' rating for landscape capacity indicates that development is likely to have a significant and adverse effect on the character of the landscape area as a whole and is thus unsuitable for strategic scale development.
- 4.13. A 'Low/medium' capacity rating indicates that development is likely to have an adverse effect on most of the character area and while smaller development may be possible in a very few locations within the character area, it will not be suitable for strategic scale development.
- 4.14. As part of the preparatory work for the Site Allocations DPD and the HKNP, High Weald AONB Unit provided advice on Horsted Keynes SHELAA Sites (October 2018 with an addendum in May 2019) which examined all the potential development sites using metadata on ancient woodland, historic field boundaries, heathland, wildflower grassland, water, geology, historic route ways, settlement and field systems.

Water

4.15. Flood risk in the parish is concentrated alongside the River Ouse, on the southern edge of the parish, and along the Cockhaise Brook and its tributaries. These higher risk areas are well away from the village. There is also a surface water flooding risk in a number of locations arising from intense rainfall events, where run off from hard surfaces and fields overwhelms local drainage infrastructure. There have been few reporting incidences of flooding and Environment Agency has confirmed that the large majority of the parish is in Flood Zone 1, which is defined as having a low probability of flooding from rivers. This is shown in Figure 4.2 below.

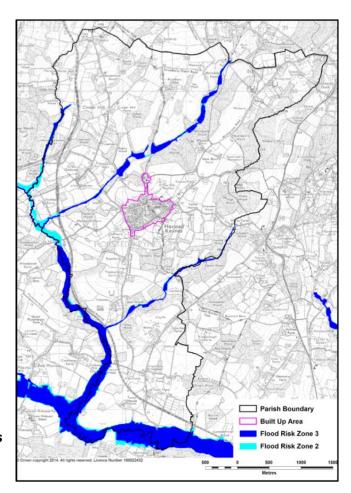


Figure 4.2: High flood risk areas

Soils and Geology

- 4.16. Horsted Keynes parish is dominated by loamy and, to a lesser extent, clay soils. This has slightly impeded drainage with moderate to high fertility¹. Farmed land is drained and therefore vulnerable to pollution run-off and rapid through-flow to streams.
- 4.17. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Published by Natural England², the ALC provides a classification in 5 grades using a number of criteria including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness). The scales ranges from 1 (best quality and most versatile) to 5 (poorest quality).
- 4.18. The NPPF (paragraph 174) states that relevant planning authorities should take into account the economic and other benefits of safeguarding the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The ALC for Mid Sussex district, as summarised in the Mid Sussex District Plan Sustainability Appraisal, states that 63.7% of the area of the district is classified as Grade 3, with 1.4% classified as Grade 2 and none classified as Grade 1 (paragraph 3.66). Whilst the NPPF says that Grades 1, 2 and 3a represent best and most versatile agricultural land, it is not possible to split the Grade 3 land in the district out to identify the proportion that is Grade 3a. It is also not possible to look at an equivalent split for Horsted Keynes parish. However, the large majority of land in the parish is classified as Grade 3 so it is considered that there is only a minimal amount of agricultural land in the parish that could fall into the 'best and most versatile' category. The majority therefore is of moderate agricultural value.

Heritage

- 4.19. The parish includes 54 listed buildings, of which one is grade I listed, 52 are grade II and one is grade II*. Of this total, 23 are in or adjacent to the Horsted Keynes village settlement area, with the majority being outside the settlement boundary. This is shown in Figures 4.3 and 4.4.
- 4.20. There are no scheduled ancient monuments in the parish.
- 4.21. Part of Horsted Keynes village is subject to conservation area status, this having been granted in January 1985. It includes the two oldest parts of the village. The first is centred on Church Lane and contains a number of historic buildings dating back to the 17th and 18th centuries, and the 11th century church. The second is centred on The Green, and includes parts of Station Road, Lewes Road and the southern end of Church Lane. The Green is a spacious open area lined by two storey buildings of predominantly brick construction with those on the southern side well set back from the road. Many of the properties around The Green and along Church Lane, including The Crown Public House and The Forge, are listed as being of architectural or historical importance. Trees and hedgerows are particularly important features within the village, as are the Recreation Ground and Cricket Ground which provide a spacious setting for development to the south of The Green.

¹ Source: Cranfield Soilscape map

² Source: http://publications.naturalengland.org.uk/file/4424325

- 4.22. The following features contribute to the particular character of the Conservation Area:
 - the spacious character of The Green, the attractive groupings of buildings around The Green and the sense of enclosure created by both buildings and landscaping;
 - the variety of age and style of buildings, several of which are Listed Buildings;
 - the use of traditional and natural building materials;
 - the extensive views of the countryside from within the Conservation Area, especially around St Giles Church;
 - the hedgerows, trees and banked verges, including those in Church Lane, Bonfire Lane and Wyatts Lane; and
 - the views of the church from within the village.
- 4.23. There is a second conservation area at Birch Grove in the far north-east of the parish. This was designated in 1990. The focal point of the conservation area is a small triangular green, around which the majority of the buildings are clustered, away from the highway; the absence of through traffic results in a peaceful and attractive environment.

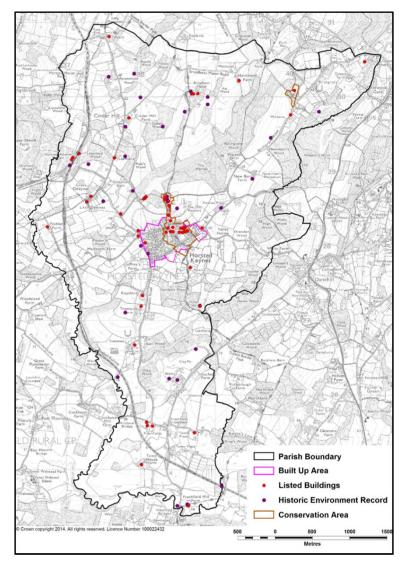


Figure 4.3: Listed buildings and Conservation Area in Horsted Keynes parish

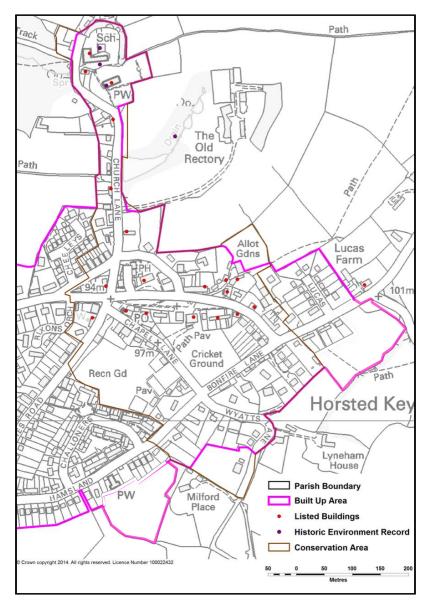


Figure 4.4: Listed buildings and Conservation Area in Horsted Keynes village

Air and Climate

4.24. Generally, air pollution is low and the lack of strategic routes through the parish mean that emissions generated by traffic are also low. There are no Air Quality Management Areas within the Neighbourhood Plan area.

Human characteristics

4.25. Figure 4.5 shows that the general health of Horsted Keynes residents is good. Those with 'very good' health are above the district average which more than offsets the slightly lower proportion of those with 'good' health. Those in bad health represent just over 3% of the population.

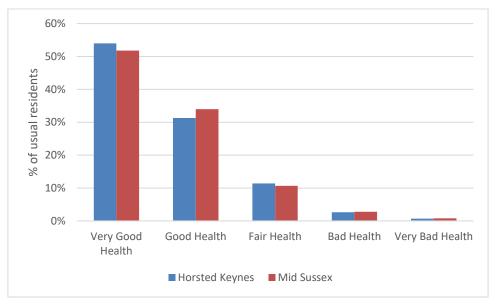


Figure 4.5: General health, 2011

Source: 2011 Census

Roads and transport

- 4.26. The local roads serving Horsted Keynes village are small, rural roads that are inappropriate for carrying significant volumes of traffic.
- 4.27. There are no major routes through the parish.
- 4.28. The village is served by the No. 270 Metrobus service which runs from East Grinstead to Brighton and connects many of the villages along the way. It operates hourly from Monday to Saturday providing a connection to Haywards Heath station, the main strategic connection to the rail network, which takes approximately 20 minutes. There is a more restricted service on Sundays and Bank Holidays, with 4 journeys in each direction. Given the service times, it is mainly used by students and retirees.
- 4.29. The Bluebell Railway is a heritage line between Sheffield Park and East Grinstead, where it now links into the Southern Railway network. There is a station at Horsted Keynes, approximately 1.5 km to the north-west of the village.

Infrastructure

- 4.30. Horsted Keynes has the following community infrastructure assets:
 - A primary school
 - Church
 - Village Green used for formal and informal recreation
 - Two pubs and a social club
 - A convenience store
 - A community centre (Martindale Centre) and a village hall
 - Allotments.

Economic characteristics

- 4.31. The 2011 Census recorded that the population of the Horsted Keynes parish was 1,586 persons, living in 643 households. Since 2001, the population has grown by 83 persons, or 5.5%. Comparatively, the Mid Sussex district population grew by 10%. Over the same period, the number of households grew by 45 (7.5%) in Horsted Keynes and by 10% in Mid Sussex district. This number will reflect the number of new houses built over the decade and also possibly the sub-division of existing properties into multiple households.
- 4.32. There has been a broad trend in the increase in population and number of households across the wider district, but the rate of increase appears to be slightly lower in Horsted Keynes.
- 4.33. A potential barrier for access to housing is house prices both in relative and absolute terms. In December 2015, the average price of a dwelling (all types) in the RH17 postcode area (covering Horsted Keynes and the surrounding rural areas) was £567,000 3 . Based on a 95% mortgage, a couple would need a combined income of £215,500, or a single person an income of £179,500, to be able to buy such a property. The average house price (all types) in the RH17 postcode area had risen to £650,000 by December 2019, according to Zoopla 4 .

³ Source: <u>www.home.co.uk</u>

⁴ Source: https://www.zoopla.co.uk/house-prices/rh17/

5. KEY SUSTAINABILITY ISSUES

SWOT analysis

5.1. Table 5.1 has been informed by the issues identified in the Neighbourhood Plan public workshops and consultation, and the baseline information collected in Section 3.

Table 5.1: SWOT analysis of issues facing Horsted Keynes parish

Strengths

Low crime rate, valued school, outstanding landscape setting, designated land (e.g. AONB,), village green setting, conservation area, choice of pubs, shop, friendly church, bus service, access to Haywards Heath, Burgess Hill and East Grinstead for other major hubs.

Weaknesses

Traffic speed, volume and weight, pedestrian vulnerability, infrequent public transport, limited health facilities e.g. doctors' surgery, limited activities for older children, high house prices, lack of affordable housing, piecemeal pavements and verges, lack of shops

Opportunities

Improve pedestrian safety, implement traffic management, better balanced age distribution, improve contact and service to elderly, encourage use of renewable energy, encourage local businesses, expand community activities

Threats

Climate change, loss of biodiversity, drought or water interruption/contamination, danger from traffic on strategic roads, inappropriate development leading to loss of rural character, loss of services such as buses, shops, loss of local distinctiveness

Key issues

- 5.2. There are a number of sustainability issues and challenges facing the parish. While Horsted Keynes parish offers a high quality environment to residents and local businesses, the Neighbourhood Plan will need to manage and seek to resolve a series of issues over its lifetime if the parish is to continue to be successful while respecting its outstanding landscape setting.
- 5.3. In the absence of a Neighbourhood Plan (and as a consequence a lack of vision and strategy for Horsted Keynes), there will be fewer opportunities to address the issues and challenges facing the parish, as well as contributing to a reduction in the potential benefit to the community.

Table 5.2: Challenges and impacts of not having a neighbourhood plan

Challenges facing Horsted Keynes Parish	Effect of not having a neighbourhood plan
Problem of safety for pedestrians on rural lanes	Residents' lives will be further affected, and safety could be worsened, by higher traffic levels.
Viability of primary school	School roll reduces and therefore the school faces the threat of closure.
Scale of housing growth	District Plan policies are strategic in nature but do require growth of rural settlements. Therefore, Horsted Keynes could continue to be exposed to speculative applications for major housing development.
Lack of affordable housing for parish residents	No suitable sites for housing for local people would be delivered and some local housing needs would remain unmet.
Supporting an ageing population	Potential issues of care/support/transport and a lack of local homes suitable for the needs of older people.
Inadequate and potentially reducing public transport options	Increased dependence on the private car and increasing isolation for those unable to afford a car.
Support and flexibility for local businesses	The needs of businesses to grow and change may be restricted by current rural planning policies.
Infrastructure improvements such as roads, crossings, parking, community facilities	Funding for infrastructure requirements may not arise.
Pressures for development in countryside	District Plan policies are strategic in nature but do require growth of rural settlements which could therefore be ad-hoc and unplanned.
Poor access to services and facilities	Increased dependence on the private car to access services and inability to do so for those unable to afford a car.
	Could result in the loss of the shop with no alternative convenience retail provision.
Need to maintain and enhance the high quality natural environment, wildlife networks and biodiversity of the parish	Could result in unnecessary impacts on biodiversity due to unplanned development coming forward through speculative applications.
Need to protect and enhance the historic buildings and environment of the parish	Could result in unnecessary impacts on heritage assets due to unplanned development arising from speculative applications, or failure to promote new uses or adapt to changing needs.
Climate change	An absence of planning policies to manage and mitigate the impacts of climate change, such as increased flood risk, land drainage problems and a range of impacts on local plants and animals, some of whom may struggle to adapt to changing conditions.

6. OBJECTIVES OF THE SUSTAINABILITY APPRAISAL

- 6.1. The issues for the Neighbourhood Plan and the objectives for the SA/SEA, have been informed by the policy documents identified in section 2, in particular:
 - National Planning Policy Framework (July 2021) the Mid Sussex District Plan 2014-2031, adopted March 2018
 - the results of the resident surveys from 2012, informal interviews with local businesses and engagement events conducted throughout 2014 and 2015
 - the baseline information collected in section 4 and the sustainability challenges for Horsted Keynes Parish identified in section 5.
- 6.2. The Objectives, and the Indicators used to measure them, are collectively known as the Sustainability Framework.
- 6.3. The SA/SEA objectives selected were considered the most relevant to enable a proper assessment of sustainability issues in the area and at this scale. At the time the Neighbourhood Plan would propose site allocations. Now that this is no longer the case, this range of objectives, if not the Appraisal as a whole, is somewhat superfluous, given the narrowing of the Plan objectives and Policies.
- 6.4. With the DPD having taken responsibility for housing growth in the village, the remaining Policies are modest in their scope and effect. However, having embarked on the exercise, the Parish Council has not sought to abandon it at this late stage. The SA/SEA assesses each of the proposed Neighbourhood Plan Policies against the 11 Sustainability Objectives. Each policy is tested by applying a number of 'indicators' to it. This enables the performance of the policy to be judged against each of the sustainability objectives, in terms of positive, neutral or negative impact.

7. SUSTAINABILITY OBJECTIVES

- 7.1. In order to undertake the SA/SEA process for the Neighbourhood Plan, it is necessary to identify sustainability objectives and indicators to enable an assessment to be made of the emerging options and allow for recommendations and mitigation measures to be proposed. The sustainability objectives have emerged through the following considerations:
 - through the review of documents listed in Section 3
 - as identified in the baseline section (Section 4)
 - to help address sustainability issues known locally
 - to help address the 'weaknesses' and mitigate the 'threats' outlined in the SWOT analysis (Section 5).
- 7.2. The proposed sustainability objectives and indicators (Sustainability Framework) for the SEA of the Neighbourhood Plan are as shown in Table 7.1 below:

Table 7.1: Sustainability objectives and criteria for the Horsted Keynes Neighbourhood Plan

Sustainability theme	Objectives	Criteria
1/Env	To preserve and enhance the natural beauty of Horsted Keynes in terms of its: - geology, landform, water systems and climate - ancient woodlands - tranquillity	 Area of Ancient Woodland within the parish. Area of Sites of Special Scientific Interest Number of developments in 'highly vulnerable' or 'more vulnerable' flood risk areas. Loss of any of these features through grant of planning consent.
2/Env	To protect and enhance the biodiversity of the parish, its wildlife habitats and species.	 Area of priority habitats within the parish (data from Sussex Biodiversity Records Office). Condition of ancient woodland in parish. Number of trees with TPOs. Length of hedgerows in parish.
3/Env	To protect the landscape setting of Horsted Keynes village by focusing development on previously developed land and minimising the use of land within the Area of Outstanding Natural Beauty	 Development within the Area of Outstanding Natural Beauty. Loss of views of value. Number of planning applications granted in areas with low landscape capacity. Development on previously developed land.
4/Soc	To ensure that housing addresses the needs of the existing community of Horsted Keynes before addressing wider needs	 Mix of housing built by dwelling size. Number of people with a local connection on the Housing Register that are newly housed. Number of affordable homes completed.

Sustainability theme	Objectives	Criteria
5/Econ	To maximise potential employment opportunities, including home working.	 Number of new businesses in the parish. Number of local start-ups. Data on employment levels. Number of businesses and dwellings (for home workers) with access to superfast broadband.
6/Env	To protect the distinct local heritage of Horsted Keynes.	 Number of listed buildings in built-up area. Number of applications for listed building consent. Number of developments within or adjacent to a Conservation Area.
7/Soc	To ensure that the community has a high quality and healthy lifestyle.	 Census figures on long term illness and general health. Number/area of green spaces within walking distance of homes. Usage of formal green spaces within the parish. Number of formal recreation facilities within walking distance of homes.
8/Econ	To improve safe movement around the parish and to key service centres outside the parish by a range of modes	 Levels of traffic travelling through the centre of Horsted Keynes village. Number and distance of new footpaths. Speed data from police. Accident data from police. Number of safe crossing points in the village. Availability of regular public transport.
9/Soc	To ensure that the community has adequate access to the key services it needs, including convenience shops and schools	 Distance the population of the parish live from key services. Number of shops in village. Speed of broadband services. Quality of mobile signal.
10/Soc	To ensure the provision of a range of community facilities that provide for the needs of the community	- Number of community facilities within the parish.
11/Env	To ensure that the adverse environmental effects of new development are minimised and that opportunities to provide for sustainable energy are taken	Number of dwellings incorporating sustainable energy features.Number of new community energy schemes.

8. ASSESSMENT OF NEIGHBOURHOOD PLAN OBJECTIVES & POLICIES

- 8.1. As the Neighbourhood Plan has developed, the objectives and policies have been tested against these sustainability objectives, to identify appropriate policies for inclusion in the Plan.
- 8.2. Realistic policy options have been appraised against the Sustainability Objectives in order to ensure that the policies chosen for the Neighbourhood Plan are sustainable. In practice, the only alternative to all of the policies is that of having no policy (a 'policy off' position)_and relying upon other development plan policies or national policy.
- 8.3. The following symbols have been used to record the impact of each option against each objective:

++	Significant positive impact on sustainability objective
+	Positive impact on sustainability objective
+?	Possible positive impact or slight positive impact on sustainability objective
0	No impact or neutral impact on sustainability objective
-?	Possible negative impact or slight negative impact on sustainability objective
-	Negative impact on sustainability objective
	Significant negative impact on sustainability objective

NDP Objectives

- 1. Conserve and enhance the environment of the village in order to maintain its distinct rural identity, built heritage and outstanding landscape setting.
- 2. Maintain and enhance existing, and encourage new, local services and facilities.
- 3. Encourage development which seeks to meet Horsted Keynes's local housing needs over the plan period with emphasis on housing that addresses the needs of younger people and families to help maintain a mixed and balanced community.
- 4. Support local businesses and encourage enhanced employment opportunities within the parish including home working.
- 5. Reduce the negative impacts of traffic and roadside parking on the village and encourage safe walking and cycling.
- 6. Minimise the adverse environmental effects of new development and support energy reduction and sustainable energy opportunities for the whole village, in order to mitigate, and adapt to, climate change.

Assessment of NDP objectives												
NDP OBJECTIVES	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc – Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env - Energy	
1. Environment	++	+	++	0	0	++	+?	0	0	0	0	
2. Services	0	0	0	0	+	0	+?	:	+	++	0	
3. Housing	0	0	-	++	+?	0	0	0	+?	0	+	
4. Employment	0	0	0	0	+	0	+	+?	+?	0	0	
5. Transport	+	+?	0	+?	0	0	+	++	+?	0	0	
6. Climate	0	+?	-?	0	0	0	0	0	0	0	++	

Summary and conclusion:

The NDP Objectives broadly support the SA/SEA Objectives, these are often in a focused manner in which both sets of Objectives are addressing the same topic. Where any minor adverse impacts of an NDP Objective might occur, these are outweighed by positive impacts on other SA/SEA Objectives

Policy HK1: Built-up Area Boundary

Policy Options:

Option A: To have an NP policy that directs development depending on whether it is inside or immediately adjacent to, or lies well outside the built up area boundary.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP12 and DP15 Plan (March 2018).

Policy Options	1/Env – Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc – Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env – Energy
Α	+?	-?	-?	+	0	0	0	+	0	0	0
В	+?	-?	-?	+	0	0	0	+?	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

Policy Option A performs more successfully than Option B with regard to sustainability due to its greater emphasis on retaining a compact built environment. This policy also has a positive impact on transport and movement, and a significantly positive impact on community housing.

A

Policy HK2: Community-led Housing

Policy Options:

Option A: To have an NP policy that promotes community-led housing development tailored to meet local housing needs.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP31 and DP32.

Policy Options	1/Env – Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	2.1. 7/Soc – Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env – Energy
Α	0	0	0	++	+	0	+?	+?	+?	0	+
В	0	0	0	+	+	0	+?	+?	0	0	0
					•			•			

Preferred Policy Option:

Summary and conclusion:

Policy Option A performs better than Option B with regard to sustainability due to its strong focus on meeting local housing needs in the village and, to a lesser extent, development which will support local services and promote energy efficiency.

Policy HK3: Dwelling Mix

Policy Options:

Option A: To have an NP policy that promotes the development of smaller dwellings in response to need within the community.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policy DP30.

A

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport &	9/Soc - Services	10/Soc – Community	11/Env – Energy
Α	-?	-?	-?	++	0	0	+?	0	0	+	+?
В	-?	-?	-?	+?	0	0	0	0	0	0	0
Drofor	Droforred Deliev										

Preferred Policy
Option:

Summary and conclusion:

This policy will have a significant impact on housing in the area and responds to a need for more smaller dwellings as expressed by the imbalance between the existing housing stock and current housing needs in the parish. Option A scores more positively against objectives 4, 7, 10 and 11. The positive social impacts outweigh the potential or slight negative impacts related to environmental sustainability.

Policy HK4: Maintaining Character and Good Quality Design

Policy Options:

Option A: To have an NP policy promotes distinct, high quality urban design in keeping with Horsted Keynes' character.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP26 and DP39.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc- Community	11/Env- Energy
Α	+	+	++	0	0	0	0	+	0	0	++
В	+?	+?	+	0	0	0	0	0	0	0	0

Preferred Policy Option:

Α

Summary and conclusion:

There are no negative impacts on sustainability when considering good quality design. By having this policy, a significant positive impact will be seen under objectives 3 and 11, which is less positively neutral in option B. Therefore, Option A is justified as it adds specific benefits to design quality and addressing climate change, through mitigation and adaptation measures.

Policy HK5: Infill Development and Residential Extensions

Policy Options:

Option A: To have an NP policy that ensures that the area surrounding new development is respected in terms of design, building spacing and parking in regard to infill development and residential extensions.

Option B: To have no NP policy, and to rely on the NPPF and MSDP policies DP6, DP12, DP15, DP26, DP27.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env - Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	+	0	0	+	0	+	+?	+	+?	0	0
В	+?	0	0	+	0	+?	0	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

Option A has a number of more positive impacts when assessed against sustainability objectives 1, 6, 8 and 9. It also has no negative impacts.

Policy HK6: Conserving local heritage

Policy Options:

Option A: To have an NP policy that promotes preservation and enhancement of the parish's built heritage, particularly conservation areas and listed buildings.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP34 and DP35.

Policy Options	1/Env – Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	2.2. 7/Soc – Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env – Energy
Α	0	0	0	0	+?	++	0	0	0	+?	0
В	0	0	0	0	+?	+	0	0	0	+?	0
	Preferred Policy Option:			A				•			

Summary and conclusion:

Policy Options A and B perform similarly across all aspects of sustainability, except that Option A performs better on sustainability criteria 6 (Heritage) in that it has a specific focus on the distinctive local heritage of Horsted Keynes, its conservation areas and listed buildings.

Policy HK7: Local Green Spaces

Policy Options:

Option A: To have an NP policy that promotes protection of Local Green Spaces in the parish (as defined in NPPF paragraphs 101-103).

Option B: To have no NP policy and to rely on the NPPF.

Policy Options	1/Env – Countryside	2/Env - Biodiversity	3/Env - Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	2.3. 7/Soc – Health	8/Econ - Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env – Energy
Α	++	++	+	0	0	++	++	0	0	++	0
В	+	+	+	0	0	+	+	0	0	+	0

Preferred Policy Option:

A

Summary and conclusion:

Option A offers significant benefits in terms of sustainability objectives 1, 2,6,7 and 10, reflecting the multiple benefits often provided by local green spaces in protecting natural beauty, biodiversity and heritage and in promoting community health and access to services.

Policy HK8: Recreation

Policy Options:

Option A: To have an NP policy that provides guidelines for the maintenance, expansion, renewal or replacement of recreation facilities.

Option B: To have no NP policy, and to rely on the NPPF and MSDP policies DP24 and DP25.

Policy Options	1/Env – Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	2.4. 7/Soc – Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env – Energy
Α	-?	-?	0	0	+?	-?	++	0	++	++	0
В	-?	-?	0	0	+?	-?	+	0	+	+	0

Preferred Policy Option:

A

Summary and conclusion:

Option A offers significant benefits in objectives 7, 9 and 10 in terms of community health, access to services, and meeting community needs. Although there may be some negatives impacts, these can be largely managed and mitigated by the terms of the policy. The benefits afforded by Option B are less significant, as there is lesser focus on local community needs.

Policy HK9: High Weald AONB

Policy Options:

Option A: To have an NP policy that assists the protection and enhancement of the character and appearance of the High Weald AONB in the parish.

Option B: To have no NP policy, and to rely on the NPPF and MSDP policy DP16.

Policy Options	1/Env – Countryside	2/Env - Biodiversity	3/Env - Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	2.5. 7/Soc – Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc - Community	11/Env – Energy
Α	++	++	++	-	-	++	++	0	0	0	0
В	+	+	+	-	-	+	+	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

Options A and B are assessed to be similar in terms of their impacts, which particularly focus on the significant environmental benefits from protecting this nationally important landscape and possible harm to the ability to meet local housing and employment needs, but Option A is considered to produce a more significant positive impact because of its focus on the particular local landscape features of the parish.

Policy HK10: Protection and Improvement of Natural Habitats

Policy Options:

Option A: To have an NP policy that promotes the protection of natural habitats, and suitable mitigation when protection cannot reasonably be avoided.

Option B: To have no NP policy, and to rely on the NPPF and MSDC Policies DP37 and DP38.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	++	++	0	0	0	0	+?	0	0	0	0
В	+	+	0	0	0	0	+?	0	0	0	0

Preferred Policy Option:

A

Summary and conclusion:

No negative sustainability impacts are expected to result from this policy. Having a local policy ensures that the most important wildlife habitats in Horsted Keynes are specifically protected and there is mitigation for any impacts – this has a significant positive impact on objectives 1 and 2, and a positive impact on community health.

Policy HK11: Low Carbon Design and Renewable Energy Schemes

A

Policy Options:

Option A: To have an NP policy that promotes carbon neutral development and renewable energy technologies.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP39, DP40.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env - Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	+?	0	0	0	0	0	0	0	0	0	++
В	+?	0	0	0	0	0	0	0	0	0	+

Preferred Policy Option:

Summary and conclusion:

There are significantly positive sustainability impacts from this policy with regard to objective 10, with no negative impacts. Possible positive impact on Objective 1 in terms of mitigating flood risk.

Policy HK12: Sustainable Drainage System Design and Management

Α

Policy Options:

Option A: To have an NP policy that requires the inclusion of effective SUDS in new developments.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP41, DP42.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	+	+	+	0	0	0	0	0	0	0	0
В	+	+	0	0	0	0	0	0	0	0	0

Preferred Policy Option:

Summary and conclusion:

From this policy the community's priorities are emphasised through a positive impact on sustainability with regard to objective 1, 2 and 3.

Policy HK13: Light Pollution

Policy Options:

Option A: To have an NP policy that requires the demonstration of minimised light pollution in new developments.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policy DP 29.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	+?	0	+?	0	0	0	0	0	0	0	++
В	0	0	0	0	0	0	0	0	0	0	+

Preferred Policy Option:

A

Summary and conclusion:

From this policy the community's priorities are emphasised through a positive impact on sustainability with regard to objectives 1, 3 and 11. There are no negative impacts.

Policy HK14: Expansion of Existing Commercial Premises

Policy Options:

Option A: To have an NP policy that permits extensions to commercial development in accordance with certain criteria.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP1, DP14, DP19.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	-?	-?	-?	0	++	0	0	0	++	0	0
В	-?	-?	-?	0	+	0	0	0	+	0	0

Preferred Policy Option:

Α

Summary and conclusion:

Through this policy there are potential negative impacts associated with the impact on the landscape and natural environment. However, the policy seeks to mitigate against these impacts. Therefore the significant positive impacts related to objectives 5 and 9 outweigh these potential negative impacts.

Policy HK15: Broadband and Telecommunications

Policy Options:

Option A: To have an NP policy that supports the provision of improved broadband and phone connection services.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policy DP23.

A

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	-?	-?	-?	0	+	0	0	0	++	0	0
В	-?	-?	-?	0	+?	0	0	0	+	0	0

Preferred Policy Option:

Summary and conclusion:

There are significant positive impacts with regard to social sustainability and other benefits for the local economy. These will outweigh the possible negative environmental impacts on the landscape that could occur.

Policy HK16: Loss of Existing Public Car Parking

Policy Options:

Option A: To have an NP policy that requires parking spaces to be replaced if removed by development.

Option B: To have no NP policy, and to rely on the NPPF and MDDP Policy DP21.

A

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	-?	-?	-?	0	0	0	0	++	0	0	0
В	-	-	-	0	0	0	0	+	0	0	0

Preferred Policy Option:

Summary and conclusion:

The policy aims of maintaining the accessibility of services in the village and improving its safety under objective 8, are considered to outweigh the potential negative impacts of new development on the landscape and biodiversity. Any new parking provision would have to be in the centre of the village where such impacts would be minimised.

Policy HK17: Cycleways and Footways

Policy Options:

Option A: To have an NP policy that promotes the extension of footpaths and cycleways.

Option B: To have no NP policy, and to rely on the NPPF and MSDP Policies DP20, DP21, DP22, DP29.

Policy Options	1/Env - Countryside	2/Env - Biodiversity	3/Env – Landscape/Views	4/Soc - Housing	5/Econ - Commercial	6/Env - Heritage	7/Soc - Health	8/Econ – Transport & Movement	9/Soc - Services	10/Soc – Community	11/Env- Energy
Α	0	0	0	0	0	0	++	++	0	++	++
В	0	0	0	0	0	0	+	+	0	+?	+

Preferred Policy Option:

A

Summary and conclusion:

There are no negative sustainability impacts associated with the provision of footways that are sufficiently wide to provide for a variety of needs. This is also the case for cycleways. Together they will have a large positive impact on the community, particularly in regard to objectives 7, 8, 10 and 11.

9. CUMULATIVE EFFECTS OF NEIGHBOURHOOD PLAN POLICIES

- 9.1. Whilst some of the policy options may individually have a minor impact (either positive or negative) on the environmental, social and economic characteristics of the parish, collectively they may have a much more significant impact. As part of this SA/SEA, the combined impacts of the policy proposals have been considered. It is acknowledged that there are a number of uncertainties in this respect, especially when considering the effects over the time scale of the Plan.
- 9.2. In most cases, assessing the social and economic effects of a policy results in many of the negative environmental sustainability impacts identified for individual policies being balanced out. When appraising the cumulative impacts of all the policies within the Neighbourhood Plan these negative impacts have been addressed by other policies, illustrated in Table 9.1 below.

Table 9.1: Cumulative impact of Neighbourhood Plan policies

	Sustainability Objectives											
Policy	1	2	3	4	5	6	7	8	9	10	11	
HK1	+?	-?	-?	+	0	0	0	+	0	0	0	
HK2	0	0	0		+	0	+?	+?	+?	0	+	
нкз	-?	-?	-?	++	0	0	+?	0	0	+	+?	
НК4	+	+	++	0	0	0	0	+	0	0	++	
НК5	+	0	0	+	0	+	+?	+	+?	0	0	
нк6	0	0	0	0	+?	++	0	0	0	+?	0	
НК7	++	++	+	0	0	++	++	0	0	++	0	
нк8	-?	-?	0	0	+?	-?	++	0	++	++	0	
нк9	++	++	++	-	-	++	++	0	0	0	0	
HK10	++	++	0	0	0	0	+?	0	0	0	0	
HK11	+?	0	0	0	0	0	0	0	0	0	++	
HK12	+	+	+	0	0	0	0	0	0	0	0	
HK13	+?	0	+?	0	0	0	0	0	0	0	++	
HK14	-?	-?	-?	0	++	0	0	0	++	0	0	
HK15	-?	-?	-?	0	+	0	0	0	++	0	0	
HK16	-?	-?	-?	0	0	0	0	++	0	0	0	
HK17	0	0	0	0	0	0	++	++	0	++	++	

10. OVERALL CONCLUSION

- 10.1. The assessment indicates that the proposals of the Neighbourhood Plan will have a number of positive effects and a small number of likely or possible negative effects. The potential for significant negative effects has been avoided through policy wording requiring mitigation measures.
- 10.2. In practice, the only alternative to all of the policies is that of having no policy (a 'policy off' position)_and relying upon other development plan policies or national policy. This has been assessed and none appear to lead to better sustainability outcomes, marginal through the differences are in most cases.
- 10.3. Therefore, the assessment of the final objectives and policies of the Neighbourhood Plan indicates that the Plan contributes to the achievement of sustainable development and offers a supplementary level of guidance to those of national or local development policy.

Monitoring

10.4. The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures for each objective set out in this report. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the plan. Should any real or potential negative impacts be identified then the Parish and District Councils will seek to review the relevant policies and their implementation.

Appendix A Summary of responses from statutory bodies during SA scoping process

	How response has been dealt				
Statutory body and response	with				
Environment Agency:	No change required				
Standing advice should be applied.					
Historic England:	No change required				
No specific comments made					
Natural England:					
- Horsted Keynes is surrounded by grade 3	- There are no brownfield sites				
agricultural land. Assuming this settlement is to be	therefore all development				
the focus of development, then the issue is about	options involved greenfield				
the need for green field development weighed	sites. This needs to be				
against the loss of what may be the best and most versatile. Some consideration of options may be	weighed against housing need, which is an issue addressed at				
appropriate.	district level through the				
арргорнасе.	emerging Local Plan.				
- The area immediately around the settlement does	- Noted				
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.					
	- Noted				
- 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 High Weald AONB Unit has				
	been consulted on this and all				
- The second main concern is the impact on the	other aspects of plan				
designated landscape. This should be informed by	preparation				
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.					
necucui	<u> </u>				

Appendix B Summary of relevant plans and programmes

International context

Key objectives	Key targets/indicators	Key implications for NP and SEA
EU Habitats and Conservation of V	Vild Birds Directives (92/43/	EC and 79/409/EEC)
To conserve fauna and flora and natural habitats of EU importance by the establishment of a network of protected areas throughout the European Community. This was designed to maintain both the distribution and abundance of threatened species and habitats. EU Water Framework Directive (20)	Identifies endangered habitats and species requiring protection and need for reestablishment of denuded biotopes. Protected areas should be created, maintained and managed.	Plans should take account relevant SPA and SAC sites. If negative impacts are anticipated appropriate assessments should be undertaken. Above protecting the integrity and interest of European sites, the NP should consider objectives to protect and if possible, enhance biodiversity.
To expand the scope of water	Prevent deterioration in the	Plan should consider any significant
protection to all waters, surface waters and groundwater. Achieve 'good status' for all waters by 2015. Water management should be based on river basins and a 'combined approach' of emission limit values and quality standards. Water management should include the closer involvement of community.	status of aquatic ecosystems, provide protection and improve ecological condition: achieve at least good status for all water bodies by 2015 (or later subject to specific criteria). meet the requirements of WFD protected areas promote sustainable use of water conserve habitats and species that depend directly on water progressively reduce or phase out pollutants that pose significant threats to the aquatic environment / groundwater help mitigate the impacts of floods and droughts.	hydrological / hydrogeological factors and ensure integration with existing catchment management plans. Plan should consider including objectives to protect and enhance water resources, quality and ecological function.
EU Air Quality Directive (2008/50)		
Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide / oxides of nitrogen, particulates. Maintain ambient air quality in areas where it is good and improve it in others.	Sets limit values and alert thresholds for concentrations of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead.	Plan should consider (where relevant) the levels of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air. Plan should consider maintaining ambient air quality and including objectives with the aim of reducing air pollution and, where possible, enhancing air quality in respect of key pollutants.

National and regional context

Key objectives	Key targets/indicators	Key implications for NP and SEA
National Planning Policy Framework July	2021)	and SEA
Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build	Supports local and national targets with regard to biodiversity and geodiversity.	Plan should contribute to the objective of achieving sustainable development (social, economic and environmental). SA Objectives should reflect the core planning principles and policies set out in the NPPF.
a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;		 The Plan should: contribute to minimising impacts and providing net gains in biodiversity where possible contribute to the Government's commitment to halt the
b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe spaces, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and		overall decline in biodiversity – including by establishing coherent ecological networks that are more resilient to current and future pressures.
c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.		
Paragraphs 176 and 177	None	SA Objectives should reflect
"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of		the core planning principles and policies set out in the NPPF.
Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these		The Plan should ensure that development in Areas of Outstanding Natural Beauty is fully justified.

Key objectives	Key targets/indicators	Key implications for NP and SEA
designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.		
When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated the development is in the public interest. Consideration of such applications should include an assessment of:		
a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;		
b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and		
c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."		
The Waste (England & Wales) Regulation	s 2011	
To encourage/ensure waste arises/is dealt with further up the waste hierarchy. Divert waste disposal away from landfill.	Target of 50% of household waste to be recycled.	Plan must have regard to the amended waste hierarchy. Policies and objectives should where possible encourage waste to be re-used, recycled or have value / energy recovery. If possible the Plan should discourage landfilling of waste.
UK Climate Change Act 2008		
The Act introduced a statutory target for reducing carbon emissions.	Target of reducing carbon emissions by 80 per cent below 1990 levels by 2050, with an interim target of 34% by 2020 In June 2019, The UK Government announced a more demanding target of "Zero net emissions" by 2050	Planning can make a contribution to mitigating and adapting to climate change by influencing the location, scale and character of development. The plan should include policies / objectives that contribute towards achieving lower carbon emissions and greater resilience to the impacts of climate change.
Flood and Water Management Act 2010		T. B
Improve the management of flood risk for people, homes and businesses. To protect water supplies.	Local Authorities (county councils) given new "lead local flood authority"	The Plan should take account of flooding and water management issues and

Key objectives	Key targets/indicators	Key implications for NP
	responsibilities to prepare flood risk assessments, flood maps and plans. EA to prepare Local flood risk management strategies.	and SEA strategies and consider the inclusion of policies / objectives to reduce flood risks and other impacts on the water environment.
Clean Growth Strategy (October 2017)		
"An ambitious plan for Britain's low carbon future", which aims for a growing national economy, whilst cutting carbon emissions into the atmosphere.	Emissions Intensity Ratio (greenhouse gases in tonnes of CO2 compared with GDP)	The Plan should include planning policies which promote low carbon emissions
This involves promoting productivity, creating good jobs, boosting earning power and protecting the climate and the environment	2018- 270 tonnes/£m GDP 2032 target -100 tonnes	
Mainstreaming sustainable development		
This refreshed vision builds upon the principles that underpinned the UK's 2005 SD strategy, recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.	Promises a new set of indicators from DEFRA that link initiatives and include wellbeing.	Plan should take account of climate change and promote sustainability through sustainable, low carbon and green economic growth.
The South East Biodiversity Strategy (Sou	uth East England Biodivers	sity Forum) 2009
Provides a coherent vision to safeguard and enhance the regions biodiversity and wildlife. Embed a landscape scale approach to restoring whole ecosystems in the working practices and policies of all partners. Create the space needed for wildlife to respond to climate change. Enable all organisations in the South East to support and improve biodiversity.	Provides a framework for the delivery of biodiversity targets through biodiversity opportunity areas and habitat and species targets.	The NP should consider objectives to protect and where possible, enhance biodiversity.
South East River Basin Management Plan		
Prepared under the Water Framework Directive, the plan is about the pressures facing the water environment in the South East River Basin District and the actions that will address them. Originally prepared in 2009 and updated in 2015 with updated targets for 2021, 2027 and beyond 2027	By 2015, 18% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element. By 2015, 23% of surface waters will be at good or better ecological status/ potential and 33% of groundwater bodies will be at good status. In combination 23% of all water bodies will be at good status by 2015. At least 47% of assessed surface waters will be at good or better biological status by 2015.	The NP needs to consider the impact of proposed development on water quality.

County/local context

Voy abjectives	Voy towards (indicators	Very implications for ND and
Key objectives	Key targets/indicators	Key implications for NP and SEA
West Sussex Transport Plan 2011-2020	6	
To improve quality of life for the people of West Sussex via four key strategies to maintain, manage and invest in transport: • promoting economic growth • tackling climate change • providing access to services, employment & housing • improving safety, security & health	Indicators include: congestion, mode of travel to work and school, cycling trips, accessibility, road traffic accidents, road and footway maintenance, street lighting, highway structures, road flooding, air quality and transport emissions.	The Plan should consider policies / objectives which contribute to transport sustainability. This should go beyond reducing carbon emissions to include economic growth, safety, pollution, traffic reduction and access to services.
West Sussex Waste Local Plan 2014		
To facilitate a continuing decline in the reliance on disposal to land and the aspiration is that there will be 'zero waste to landfill' by 2031.	To only make provision for a declining amount of landfill over the plan period with 'zero waste to landfill' by 2031.	The Plan should consider how, within the context of a growing population in Horsted Keynes, waste generation can be minimised, and it can be ensured that Horsted Keynes contributes towards the target of zero waste to landfill.
West Sussex Joint Minerals Plan 2018	(prepared jointly with South	
This provides a strategy for minerals development across the county up to 2033. It includes 10 strategic policies (M1-M10), 1 allocation of land for the working of brick making clay at West Hoathly (M11) and 15 development management policies to Control development (M12-M26)	The 26 policies in the plan each have a set of targets and indicators	Minerals planning is a matter for WSCC, rather than the Neighbourhood Plan. The key implication for the NDP is that it should not sterilise workable mineral deposits.
West Sussex County Council - Building	A Sustainable Future: A stra	tegy for delivering the
corporate priority 2012 and updated W		
This Strategy focuses on four key priority areas that address the main challenges facing West Sussex County Council. The four priorities for action are: reduce carbon emissions adapt to a changing climate use resources efficiently and effectively make sustainability business as usual. The strategy is accompanied by a regularly reviewed Action Plan	The Strategy contains information about why these areas are a challenge to the County and sets out actions and 'clear and challenging targets against each priority'. WSCC produce "Annual Sustainability Reports" on their performance, the last of which was in 2018-19	Plan should consider including objectives / policies to support reductions in carbon emissions, and consider adaptation to a changing climate and the efficient use of resources.
Sustainable Community Strategy for W		
 Cross cutting strategy aiming to: relieve the pressures on the road network explore opportunities for renewable energy integrate water resource requirements in new development reduce carbon footprint 	No specific targets.	The Plan should consider including policies / objectives that help meet the key objectives.

Key objectives	Key targets/indicators	Key implications for NP and SEA
 improve waste management to reduce waste generation and increase recycling. make best use of innovation and new technology to reduce harmful emissions improve access for all to the natural and historic environment and a range of sporting, leisure, cultural and arts activities. Sussex Biodiversity Action Plan 		
 Maintain and, where practicable, enhance the wildlife and habitats that provide the natural character and diversity of Sussex Identify priority habitats and species in Sussex Set realistic and ambitious targets and timescales for priority habitats and species and to monitor progress towards them Raise public awareness and encourage involvement in biodiversity action. 	Sussex Biodiversity Record Centre inventory statistics for species and habitats e.g.: Rare Species Inventory Biodiversity Action Plan Species Inventory Pond Inventory.	Plan should include consider including policies / objectives to: enhance (where possible) the wildlife and habitats that give rise to West Sussex's natural character and diversity.
West Sussex Strategic Flood Risk Asse The main objective of the SFRA is to		The Plan should take into
provide flood information so that an evidence and risk based sequential approach can be made when making planning decisions in line with the NPPF. It also aims to: cover a wide spatial area and look at flood risk today and in the future support sustainability appraisals of the local development frameworks identify further investigations that may be required to assess specific development proposals. The assessment identifies 53 higher risk "wet spots" across the county, of which 6 are in Mid Sussex, but no one in Horsted Keynes Mid Sussex Strategic Flood Risk Assess	The assessment investigates flood risk issues for specific sites and makes recommendations.	account the SFRA's sequential testing guidance and should consider inclusion of objectives related to flood risk.
Identifies all areas of flood risk within the	Flood zone	The Plan needs to ensure that
district as well as what the level of risk is. The 2015 update was a "level 1" SFRA	TIOU ZOILE	new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Horsted Keynes is not exacerbated and, where possible, reduced.

Key objectives	Key targets/indicators	Key implications for NP and SEA
High Weald AONB Management Plan, 2	019-24	
High Weald AONB Management Plan, 2 The vision for the High Weald AONB is a landscape which: • Retains its distinctive historic landscape character and beauty, and has halted the erosion of natural beauty, avoiding poor development and incremental change. • Is maintained by sustainable land management practices, such as regenerative agriculture, wilding, small scale woodland management and agro-forestry and sees land managed by different people through diverse activities that are supported and nurtured where they deliver public benefits • Displays thriving wildlife and improving ecological quality in its highly connected and biodiverse landscape • Is embracing a low carbon future with green technologies and nonfossil fuel transport underpinning a strong rural economy and thriving communities • Engages people with nature and contributes to the health and well being of people within and outside the area • Demonstrates a consistent approach to planning across the AONB, allowing for appropriate housing and economic needs of thriving communities and the land-based sector without compromising the historic settlement pattern • Displays healthy natural systems including clean air and water, providing benefits across the south east • Celebrates woodland history and nurtures a woodland economy, whose timber products are highly valued • Facilitates active participation by people, their communities, and businesses, in conserving the area and managing change	The Management Plan includes a series of targets to address each of the bullet points making up the vision.	The Plan should consider how development may impact on the AONB and how the plan policies can help to deliver the AONB Board vision.

Key objectives	Key targets/indicators	Key implications for NP and SEA
 Provides a warm welcome and high quality experience for residents and visitors seeking inspiration and enjoyment of its landscape and rich, well understood and celebrated cultural heritage Is valued and understood by people, businesses and communities and championed by the High Weald AONB Joint Advisory Committee 		SEA
A Strategy for the West Sussex Landso	ape - West Sussex County C	ouncil 2005
1: ensure high quality new development which contributes to and reinforces landscape character 2: conserve and enhance historic landscape character 3: ensure the maintenance and renewal of the agricultural landscape 4: conserve and enhance semi-natural habitats including securing the future of woodlands, hedgerows and trees as distinctive landscape features 5: promote and celebrate the value and		Plan should be consistent with supporting the objectives in the strategy.
variety of the West Sussex landscape.		
Mid Sussex Landscape Capacity Study,		of Mid Sussex District to
accommodate development' study, 20: To identify where development may be carried out without an unacceptable impact on landscape character in general and on the setting of outstanding assets within Mid Sussex	5-point scale to assess landscape sensitivity and landscape value	Plan should be consistent and take into account assessment of landscape capacity
Sussex Historic Landscape Characteris	ation – West Sussex County	Council and others, 2010
To identify areas or units of land based on their key historic landscape attributes.	,	The Plan should ensure that areas of historic landscape character are preserved and enhanced.
Using Less, Living Better - West Sussex Environment and Climate Change Board, 2012		
Helping to reduce emissions by at least 50% by 2025. This supports the county wide Sustainability Strategy	None	The Plan should seek to reflect, where possible, the actions proposed and the outcomes that are envisaged.
Our Green Heritage: A Landscape and		
To recognise the value of biodiversity and landscape within the District and set out how these assets can be protected and enhanced.	Assesses protected species and valued landscapes	The Plan should ensure that it does not have an unacceptable impact on protected species or valued landscapes.
[This document has been largely superseded by later documents]		

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and SEA	
Mid Sussex Economic Development Str	Mid Sussex Economic Development Strategy (April 2018)		
The refreshed strategy seeks to promote "vibrant and attractive places where businesses and people can grow and succeed" through four priority themes: Places: viable and vibrant town and village centres; business parks to retain and attract growing businesses; and infrastructure improvements Premises: an excellent supply and quality of business accommodation People: Skills development working with education and training providers; promoting health and wellbeing in the workplace Promotion: promoting and marketing the district as a business location and visitor destination	 Continued provision of village services and facilities Availability of premises for new and growing firms Local employment and skills base 	Supporting village services and community facilities and promoting a prosperous rural economy	
Our Green Future: The UK 25 Year Env	ironment Plan (January 2018)		
"The 25 Year Plan" was published by DEFRA in January 2018. It sets out the Government's plan for regaining, and retaining, the natural environment of England in good health into the 2040s. The plan covers promoting clean air and water; soil conservation; protecting and restoring the landscape and wildlife habitats; safeguarding and restoring threatened wildlife species; mitigating and adapting to climate change; and policies for agriculture, forestry, land use, rivers and wetlands; and the marine environment.	Along with the policies are targets by which progress towards policy goals will be measured.	The 25 Year Plan sets the overall direction of UK environmental policy up to the 2040s: this is now being carried across into national and local planning policies where it relates to the development and use of land Neighbourhood plans need to be in broad conformity with the direction of the 25 Year plan , particularly on environmental protection , biodiversity and climate change issues	