

20 May 2016  
Rep Letter



Neighbourhood Plan Steering Group  
Horsted Keynes Parish Council  
Village Hall  
The Green  
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Dear Sirs

## **Representation to the Horsted Keynes Neighbourhood Plan Pre Submission Consultation**

### **Land to the West of Church Lane - Original Reference: HKNP 008**

This letter and accompanying documents is submitted to the Neighbourhood Plan Steering Group on behalf of the current Landowners of the Land to the West of Church Lane, herein referred to as The Site. This representation requests the re-consideration of the above site for inclusion as a housing allocation within the Neighbourhood Plan.

This letter should be read in conjunction with the Development Proposals brochure prepared by OSP Architecture which includes commentary from Stilwell Partnership on Transport Impacts and Access to the site.

### **Previous Stages of the Neighbourhood Plan**

At the suggestion of Steering Group Members, the Site was submitted to the initial Neighbourhood Plan Call for Sites, which took place in October/November 2014. It was assessed against the Sustainability Assessment Criteria under reference HKNP008. The assessment of the site was positive with any minor (amber) issues identified being capable of mitigation, for example through the layout or limiting the amount of development proposed on the site.

The only constraint identified was that it could not be demonstrated conclusively, at that time, that access to the site could be achieved from Station Road or Church Lane. This was not due to technical highways concerns, but because land in a third party ownership would be required (as explained below this was an error as the landowner did have rights of access to the site from Church Lane). There was no evidence that agreement couldn't be reached to achieve a satisfactory access, just the fact that no agreement from any of the landowners (particularly the Martindale Centre), had been gained at that point in time.

For this reason the site was judged to be Undeliverable. This was identified as a Fundamental Constraint, in the consultation documentation produced for the Consultation Event, held on the 24<sup>th</sup> January 2015, on the draft policies of the Neighbourhood Plan. The site was therefore not considered as one of the recommended sites for allocation. This was not withstanding it scoring positively on all other factors, including being a sustainable plot, located on the edge of the village development boundary. In our view this was a missed opportunity and failed to properly assess the real potential of the site to meet housing need. It is however noted that Steering Group had been wrongly advised of the availability of the access to the site from Church Lane. If the issue has been explored more fully it would have become clear that additional access could be achieved to the site. Site Selection Criteria marked as "amber" such as capacity in the assessment, can be

dealt with as part of the ongoing design process. We have attached the RAG Assessment for ease of reference.

### **Current Position**

The Site is now under new ownership and revised proposals for its development have been produced, which demonstrate that the key issue of access (including footways and linkage to the village centre), can be overcome and it should therefore be favourably re-considered for residential development, as part of the emerging Neighbourhood Plan.

This site is in a favourable location for residential development as it is adjacent to the existing settlement boundary and is in close proximity to the existing services and facilities in the settlement. The public footpath that runs along the northern boundary of the site offers existing pedestrian access to the settlement and wider area, reducing the need to rely on the private car for local trips. With appropriate landscaping and buffering the site, due to its topography, can be developed with no significant impacts to the existing residential properties to the south of the site and wider surrounding countryside. The use of locations with these characteristics for residential development is supported by the National Planning Policy Framework (NPPF).

To assist the Steering Group we have provided 3 indicative options which can be found in the accompanying Development Proposals brochure. These illustrate just 3 possible options for development of the site, dependant on the quantum of development and layout considered most appropriate for the Neighbourhood Plan. Each has carefully considered the topography of the site and impact on adjacent properties. There are of course other variants and options. However those shown demonstrate the suitability and deliverability of housing on the site. Each of the options has been assessed by a highways expert, to ensure the proposal will meet highways standards and can adequately service the number of dwellings proposed. Relevant information is included in the attached brochure.

The options are summarised below:

#### **Option 1**

This proposed layout would utilise the existing access to the site off Church Lane, over which the landowner has appropriate rights of way over. Therefore, there would be no need to demolish any existing residential properties or to use any third party land. It is immediately deliverable. The proposal includes 10 residential units, with a mix of 4 & 5 bedroom units, located to the south of the site along the settlement boundary. The remaining northern section of the site would be utilised for Public Open Space and landscape buffering. This was acknowledged as beneficial in the original RAG rating assessment.

#### **Option 2A**

This proposed layout would utilise a preferred access from either Station Road or Cheeleys (see Brochure illustration). It would require the purchase and demolition of an existing residential property. Discussions are underway with some parties and a satisfactory access will be provided by the time a planning application is submitted. If appropriate either of these access options could be used in combination with the existing access from Church Lane. Therefore this should not be a reason to exclude the Site in the Neighbourhood Plan. This proposal includes 41 residential units, located in the south section of the site along the settlement boundary, with the northern section of the site again being utilised for Public Open Space and landscape buffering. As with Option 1 this open space was acknowledged as beneficial in the RAG rating process.

#### **Option 2B**

This proposed layout would utilise the same preferred and alternative zones for vehicular access to the site as the above option. If appropriate either of these access options could be used in combination with the existing access from Church Lane This option includes a larger number of residential units, across the site in a self contained layout, with landscape buffers on the boundaries of the site to the existing residential properties, ridgeline and footpath. This would make a greater contribution to the villages housing need in a sustainable location without any significant visual or amenity impact.

The landowner is happy to enter into discussions with the Neighbourhood Plan Steering Group in relation to their preferred option for residential development at site, including any contributions towards on or off site affordable housing.

### **District Context & Housing Supply**

The current adopted planning policy framework for Mid Sussex District Council is the Mid Sussex Local Plan 2004 which sets out an overall housing target of 8,400 units over the period 1989-2006 and is considered to be out of date. The Local Authority is currently preparing a new Local Plan which is due to be submitted for Examination in Summer 2016. The Pre-Submission Draft District Plan has recently been amended to include a higher housing target of 800 new homes per annum, resulting in an overall target of 13,600 over the plan period 2014-2031. This is significantly higher than the previous Local Plan and demonstrates the greater need for housing in the District. This is further demonstrated by the Authority being unable to demonstrate a five year housing land supply presently.

The emerging District Plan sets out two strategic housing allocations with the remaining housing to be delivered through a combination of the neighbourhood planning process and a Site Allocations document for the District. Mid Sussex District Council have advised that the Objectively Assessed Need for Horsted Keynes is 126 units.

This clearly shows that Neighbourhood Plans are key to ensuring sufficient housing is provided in their local area, to support the needs of current and future generations of the local community and to support the presumption of sustainable development as set out in the NPPF. To play its role within the District, Horsted Keynes will need to make the maximum sustainable provision of new housing. As is identified in the emerging Local Plan, for Horsted Keynes, the Neighbourhood Plan will be the sole mechanism for allocating residential sites, and the Local Authority will scrutinise the housing allocations contained in the plan. The current proposed provision is insufficient and in our professional opinion, this will result in both the Local Authority and Planning Inspectorate finding the Neighbourhood Plan unsound in its current form and the plan will therefore not proceed to referendum. The inclusion of this Site will allow the Parish to more fully meet the identified need and the site owners are willing to work flexibly with the Steering Group in helping to achieve this.

### **Pre-Submission Horsted Keynes Neighbourhood Plan 2016-2031 - Site Allocations**

Three sites are proposed for residential development in the Pre-Submission Neighbourhood Plan:

- Police House Field – 10 units (C3)
- Land at Jeffreys Farm – 6 units (C3)
- Land at Westhall House – 14 units (C2)
- Units in the Planning Pipeline – 12 units (C3)

Total Units provided by the Neighbourhood Plan: 44

As shown above the Neighbourhood Plan sets out that a total of 44 dwellings will be provided for Horsted Keynes. However the combined total of C3 residential units is only 28 units. This is a low provision for a settlement such as Horsted Keynes, which has a range of services and facilities. It is significantly below the OAN for the Parish of 126 units, which the Neighbourhood Plan should be seeking to provide as a minimum. By only providing a total of 44 units (only 28 of which are C3) this compromises the soundness of the Neighbourhood Plan.

The settlement needs to accommodate a much larger number of residential units. A significant contribution to this number could be made by those 44 units already allocated, and an agreed proposal for the Land West of Church Lane. To date the Neighbourhood Plan has not provided any evidence on the total amount of housing development the settlement could reasonably support. With the updated OAN this justification will be required

to show Mid Sussex District Council that Horsted Keynes is playing its part in meeting the Districts need. Allocation of this site will help meet this requirement.

The Sustainability Assessment criteria was the primary method of assessing sites for housing allocations. We have now removed the issue which resulted in the only red score for the site and subject to an agreed design and layout the site, if reassessed, the Site would score very highly. When comparing the RAG scores for the 3 preferred sites, against that of this site, it had less constraints and scored highly in comparison (see attached document). This is amplified by the current proposals addressing the previous reason for the site being left out, namely access considerations.

This site is considered to be equal, if not better in terms of sustainability and overall impact on the settlement and surrounding area, than the three preferred sites currently proposed for allocation, when judged against the Sustainability Assessment Criteria. Most notably, as it is adjacent to the existing settlement boundary, whereas both the Land at Jeffrey's Farm and at Westhall House, are a significant distance from the settlement making their sustainability more marginal. Other similar remote sites were dismissed as unsustainable in the early review process.

The same applies when comparing this site's assessment to the further 6 sites (please see below) which were identified as recommended sites, as part of the consultation which took place during 2015. These sites were:

- (HKNP003) Constance Wood Field
- (HKNP012) The Old Rectory, Church Lane
- (HKNP013) Jeffreys Farm Buildings
- (HKNP014) Land north of farm buildings, Jeffreys Farm
- (HKNP016) Sugar Lane Field, Jeffreys Farm
- (HKNP025) Land behind St Stephens Church

## **Conclusion**

The primary reason our clients site was not progressed to further assessment and chosen as a recommended and preferred site by the Steering Group, was due to not being able to demonstrate the deliverability of access. This issue has been addressed in part and other access options will be addressed as and when required and it is clear that acceptable and safe access can be achieved to the site. Therefore this site should be re-considered and included in the Neighbourhood Plan as a residential allocation. The site is a sustainable location for residential development, which will assist in ensuring that the Neighbourhood Plan is able to support the housing needs of present and future residents and this will in turn support economic growth and support for local businesses, services and facilities including schools and transport infrastructure.

In our view if the draft Neighbourhood Plan does not fully address housing provision (including OAN) and appropriately assess the sustainability of available sites, it will be found to be unsound and therefore will not proceed to referendum as detailed above. It must be consistent with the emerging Local Plan, in maximising housing provision through robust and justified Neighbourhood Plan provision. The landowners would welcome the opportunity of discussing their site further with the steering group. They are keen to work with you, in achieving an adopted Plan which meets the needs and aspirations of the community, rather than contest the Neighbourhood Plan through its further stages.

Yours sincerely,

A handwritten signature in blue ink, appearing to be "D. Parr", written in a cursive style.

Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI  
Director

Encs: -           Development Brochure  
                  RAG Assessment of Site (Ref:HKNP008)