

Horsted Keynes Neighbourhood Plan – Sustainability Appraisal

July 2018

Suggested Amendments

1) General update

- The Sustainability Appraisal (October 2017) doesn't appear to have been updated since the draft Sustainability Appraisal was published at Regulation 14 stage (May 2016).
- The opening 3 chapters (Introduction, Methodology and Policy Context) should be updated to account for:
 - District Plan adoption
 - Any significant changes since the Reg 14 SA was published, for instance any fundamental changes to policy, the baseline position, or plan approach.
- Mention should be made of the responses to the Reg 14 consultation on the draft SA, and how these have led to amendments in this version of the SA, bearing in mind it is an iterative process. This needn't be a long section, and could refer to an appendix setting out the responses/proposed changes if this is easier.
- Table 8.1 will need to be updated should any of the site appraisals change/be added/deleted
- Appendix A: There is no need to publish the responses to the Scoping Stage however this could be replaced by the SA responses at Reg 14 stage
- Appendix B: Update where appropriate

2) Housing Numbers approach

- The District Plan presents a guideline figure of 53 dwellings 'to find' in Horsted Keynes (policy DP6 and supporting text).
- The Horsted Keynes Neighbourhood Plan is not intending to meet this figure, and provides the reasoning in the evidence base.
- However, the SA does not appraise the relative sustainability of a) meeting the figure of 53 dwellings; and b) not meeting the figure
- Therefore, without this appraisal, it cannot be concluded that it is "unsustainable" to meet the figure of 53, as the only mechanism for concluding this should be the Sustainability Appraisal.
- There should be an appraisal of (at least) the following options:
 - **a)** meeting the 53 and
 - **b)** not meeting the 53 (e.g. meeting the number justified by the evidence base).
- This should be accompanied by robust supporting text to ensure that it is demonstrable that, in sustainability terms, 53 can/cannot be met.
- This will strengthen the case that you are presenting to the examiner
- One example of how this has been tackled elsewhere is the Bolney Neighbourhood Plan SA (pages 24-26)

3) Policy Appraisals

- Review each of the policy appraisals that were presented at Reg 14 stage
 - Has the policy since been deleted? I note HK6 / HK7 of the Reg 14 plan have since been deleted.
 - The Reg 14 SA appraised "to have" or "to not have" these policies and concluded that "to have" was more sustainable.

- It is now a bit odd that the previous HK6 and HK7 have been deleted with no mention in the SA, and no justification in the SA for doing so (as “to not have” was no sustainable). Has this conclusion changed? If not, then some text needs to be inserted to explain the circumstances as to why they have now been deleted – this provides an audit trail.
- Ensure that the options that have been appraised accurately represent what the policy is actually saying- the examiner has picked up on the point that HK1 does not appear to match the policy presented in the plan.
- The appraisals do not have to be “to have” or “to not have”. The appraisals can appraise any number of “reasonable alternative” options

4) Site Appraisals

- All reasonable alternatives for site options should be appraised
- The obvious omission is the amalgamated Jeffrey’s Farm site; it is clear this is a ‘reasonable alternative’ as it has been submitted to the NP/planning application submitted.
- Check that there are no other possible sites (unlikely?); if there are, appraise these
- The only mechanism for determining whether a site is unsustainable is through the Sustainability Appraisal process. Therefore some of the reasoning in para 8.7 is open to challenge– particularly the line that states that 007, 009, 019, 020, 023, 026 and 027 have been assessed as “unsustainable”. Where is this documented?
- The site assessment spreadsheet and the Sustainability Appraisal are two different things. Sustainability should be assessed against the sustainability framework (i.e. the 11 objectives and indicators presented in section 7).
 - the site assessment spreadsheet can be referred to as it may support some of the conclusions;
 - the site assessment sheet can filter out sites and exclude them from the SA process (e.g. no need to assess those that are unavailable as this would not be a ‘reasonable alternative’)
 - However, it is the SA that should determine whether sites are sustainable or not.