

Comments from Horsted Keynes Parish Council

Mid Sussex Ref: AP/18/0083

Planning Inspectorate Ref: APP/D3830/W/18/321426

Land At: Land Parcel to the Rear of Peacocks, Church Lane, Horsted Keynes, West Sussex

Proposed Development: Outline Planning Application with all matters reserved except for access and siting for 38 No. houses, including 11 affordable units, including demolition of Peacocks

The Parish Council set out in a concise representation at planning application stage our main reasons for objection and we confirm that we stand by those comments.

We support the District Council in their 8 reasons for refusal. We would however like to point out that we, and our community, have very serious concerns about Highway access to the site along the shared surface of Church Lane where our school children regularly walk to school. We remain unconvinced that this is a safe situation and we are deeply disappointed that West Sussex Highways appear not to have given this proper consideration.

We are concerned by the misleading inferences that may be drawn from the Appellant's Statement of Case relating to our Neighbourhood Plan and we would like to set out some of the circumstances leading to the current position and the clear intentions of this Council going forward.

At the time of preparing our draft Neighbourhood Plan we were aware that there was an indicative number in the emerging District Plan, but we were also advised that we were not expected to reach that number because it did not take any account of the specific constraints relating to our Parish; such as the High Weald AONB and proximity to the EU protected sites on the Ashdown Forest. Also, a major part of the village was designated as a Conservation Area in 1985 and includes our Grade I Listed 13th century Parish Church and a significant number of Grade II Listed historic buildings dating back to the 17th and 18th centuries.

It was not until very late in our Neighbourhood Plan process (following amendments to the emerging District Plan) that we were given the adjusted figure for our settlement. This did not occur until after we had consulted the Parish, selected our sites and made, what we considered to be at the time, appropriate housing allocations.

Another factor that has distorted our figures is that, contrary to previous advice we received at the time, the allocations that we made for a site at Westall House appear no longer to be counted for some technical reason. This is despite the fact that Planning Permission has now been granted and a number of self-contained apartments (designed for independent living with care support if required), are due to be built there shortly and these will inevitably help to meet our housing need.

It is very regrettable that our Parish has not succeeded in getting our Neighbourhood Plan "Made" to date but this is despite a huge amount of time and effort that has been devoted to it by this Council, members of our Neighbourhood Plan Steering Groups and a significant proportion of our Parishioners who have been actively engaged in the process. The completion of our Plan was largely frustrated by delays to the District Plan and the potential threat of a Judicial Review from Wealden District Council (relating to the Habitats Regulations Assessment) that were outside of our control. When our Plan was finally submitted for

Examination we had to face the reality that it was no longer fully up to date. Having taken due note of what the Examiner said, following his initial review and after further discussion with Mid Sussex District Council, we took the decision to withdraw it.

In December 2018 we advised our Parishioners that we were considering three options for our Neighbourhood Plan: 1. Not to submit a plan, 2. To submit a plan without allocating sites and 3. To submit a plan with allocated sites. The feedback we received from Parishioners was all in support of option 3 and, as a Parish Council, we voted to submit a plan with allocated sites.

The Appellant has claimed that their site is “one of the most sustainable sites in the Parish”. This is not a view that is shared by the Parish Council and is not supported by the latest version of the assessments completed by our consultant and the High Weald AONB advisory unit.

Appendix 6 of the Appellant’s Statement of Case includes an early version of the Site Assessment. Following an Independent External Review of our draft Neighbourhood Plan by Lindsay Frost in August 2016, an amended Site Assessment was produced by our consultant which, crucially, shows that this site was considered to have a Negative “Red” assessment under “Protecting the Landscape Setting of Horsted Keynes” (in addition to the “Red” for Highway access). This amended version of the Site Assessment was included in the supporting documents for the Submitted Version of our Neighbourhood Plan. We note that the Site Assessments and Sustainability Assessments have been updated further since our Neighbourhood Plan has been withdrawn and these documents will be the subject of further reviews in the light of current evidence. We do not think it is appropriate for the Appellant to seek to rely on Site Assessments or Sustainability Assessments that were produced for our Neighbourhood Plan when this Plan has subsequently been withdrawn by us and we now know that these supporting documents contain a number of critical errors.

The Parish Council are of the view that the Appellant’s site is actually one of the least sustainable sites in the village that have been put forward in response to the calls for land, as part of our Neighbourhood Plan process and also the current Mid Sussex District Council Site Selection process.

Following the withdrawal of our Neighbourhood Plan, the High Weald AONB advisory unit has recently issued their advice to the Parish Council following their assessment of all the SHELAA sites in Horsted Keynes and concluded that this site would have a “High impact on the AONB due to damage to the settlement pattern of a Saxon village around the Church and a later medieval village around the intersecting routeways and commons to the south.”

It is now clear to the Parish Council from the most recent work that has been done by the High Weald AONB and Mid Sussex District Council (in their Site Allocations Document) that there are more sustainable sites in our Parish than the Appellant’s site. It is likely that we will now focus more on the sites that would have a “low” or “moderate” impact on the AONB and would be less likely to harm the Conservation Area or Listed Buildings, when we carry out our imminent review of the sites to prepare our amended Neighbourhood Plan.

The Parish Council are well aware of the very strong public objection that was made against this Planning Application and the Councillors received a very significant number of detailed representations from Parishioners, far more than have been received for any other planning application that we have considered.

The Parish Council do not support development of this site and are committed to delivering a Neighbourhood Plan and we will be working closely with Mid Sussex District Council to ensure that the housing provision within our amended plan will appropriately support the District Plan on the other more sustainable sites that are available to us.