

HORSTED KEYNES NEIGHBOURHOOD DEVELOPMENT PLAN

EVIDENCE UPDATE

SEPTEMBER 27 2019

Introduction

1. The Horsted Keynes Neighbourhood Development Plan (HKNDP) was originally submitted to Mid Sussex District Council (MSDC) in November 2017, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. The plan was supported by an extensive evidence base, much of which remains relevant. This paper updates evidence relevant to the HKNDP up to the end of September 2019.
2. As required by regulation 16 of the above regulations , MSDC carried out a further round of consultation during December 2017 and January 2018 and appointed an independent Examiner to assess whether the HKNDP meets the statutory “basic conditions” , which are that the plan :
 - has regard to national planning policy
 - contributes to achievement of sustainable development
 - is in general conformity with strategic policies set out in the local plan
 - is compatible with EU obligations and human rights legislation
3. The Examiner, Andrew Ashcroft, was appointed in May 2018 and started the work of assessing the HKNDP and the views received on it during the statutory consultation period. He raised a number of concerns which were outlined in a teleconference in June 2018, which included:
 - The extent to which the Sustainability Appraisal (SA), provided with the plan , meets EU obligations
 - The HKNDP does not significantly boost the housing supply (as required by national and local planning policy) and the SA did not properly consider “reasonable alternative” sites , or justify its chosen approach , which undershoots the MSDC development guideline
 - A range of housing development options need to be considered in some potential sites , not just one “amalgamated site”
 - The relationship of policy HK1 to local planning policy is unclear in respect of “unspecified housing sites adjacent to the settlement boundary”

These concerns together led the Examiner to conclude that the plan would be unlikely to meet the basic conditions and so could not be recommended to proceed to referendum.

4. At a meeting in December 2018, the Parish Council decided to withdraw the submitted HKNDP and to carry out further work to address these concerns, with a view to amending the plan and formally resubmitting it to MSDC for further consultation, examination and a referendum.

Updating the evidence base

5. The passage of time means that a number of other matters also need to be considered as part of the process of reviewing and updating the HKNDP:
 - New planning legislation
 - Updated national guidance in National Planning Policy Framework (NPPF) July 2018 and February 2019 and regular updates to the online National Planning Practice Guidance
 - Adoption of the Mid Sussex District Local Plan (March 2018)
 - Further work by MSDC on potential housing development sites in its Site Allocations Development Plan Document (DPD) and further sites submitted as part of the SHELAA process at MSDC
 - The Habitat Regulations Assessment (HRA) –European Court of Justice (ECJ) judgement in *People over Wind and Sweetman v Coillte Teoranta (Ireland)* and its impact on appropriate assessments under the Habitats Directive 92/43/EEC
 - Planning applications submitted to MSDC in Horsted Keynes parish since November 2017
 - The housing land supply position in Horsted Keynes Parish
 - A new Local Housing Needs Survey carried out by Action in Rural Sussex (AiRS)
 - Establishment of a Community Land Trust (CLT) In Horsted Keynes
 - Progress on neighbourhood plans in surrounding parishes
 - The High Weald AONB Management Plan 2019-2024 and the draft Design Guide for housing development
 - The independent review of National Parks and AONBs
 - Updated supporting documents : Sustainability Appraisal, Habitat Regulations Assessment , Basic Conditions Statement and Public Consultation Statement

Each of these matters is considered in turn below, with more detailed information, where necessary, attached in appendices

(a) New planning legislation since November 2017

6. **The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2017** came into force in January 2018 and provides detailed legislation to support the Neighbourhood Planning Act 2017 , and to update the Neighbourhood Planning (General) Regulations 2012, particularly in respect of arrangements to update and modify “made” plans.

7. **The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2018** amends the Town and Country Planning (General Permitted Development) (England) Order 2015 to: extend the existing temporary permitted development right to change the use of buildings in storage or distribution use to residential use; increase the size limits that apply to permitted development on agricultural land; amend the existing right to change use of agricultural buildings to residential use to allow up to a total of five dwelling houses, subject to limitations and conditions.
8. **The Town and Country Planning (Permitted Development , Advertisements and Compensation Amendment) Regulations 2019** also amends the 2015 permitted development regulations by making permanent the previous temporary right to enlarge a dwelling house by up to 8 metres (detached) and 6 metres (other houses) ; allowing larger electric vehicle charging stands; allowing shops, financial and professional services and food take-away shops to change to offices; allowing temporary uses in town centres ; and increased control over adverts on phone boxes.

(b) National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)

9. The NPPF was first published in 2012. It sets out the Government's planning policies for England and how these policies are expected to be applied. As such, it has to be taken into account by all users of the planning system, both in the preparation of local plans and neighbourhood plans, and in the preparation and determination of planning applications and appeals. The NPPF identifies delivery of sustainable development – with economic, social and environmental dimensions - as the central purpose of the planning system.
10. The NPPF was updated in July 2018 and February 2019. The main changes arising from the two NPPF updates are :
 - Revisions to the presumption in favour of sustainable development
 - Increased emphasis on the delivery of more housing and clarification of definitions and methods to achieve this
 - Where affordable housing provision may be sought
 - More emphasis on improved design as a means of increasing public acceptance of more housing
 - Encouraging more effective use of development land
 - Development viability to focus on local plans rather than individual applications
 - Increased protection for ancient woodland
 - Application of the Habitats Regulations to new development in light of recent legal cases (see paragraphs 16-18 below)
 - Clarifying the weight to be attached to proposals affecting heritage assets

In parallel with the NPPF updates, the National Planning Practice Guidance (NPPG) continues to be updated regularly online. The guidance on neighbourhood planning was extensively updated on 13 September 2018 and 9 May 2019. The latest update states that neighbourhood plans must meet housing need in their area “in full”, if they are to benefit from the limited protection from the presumption in favour of development offered by paragraph 14 of the NPPF. It goes on to list three criteria that must be met, which are that the neighbourhood plan

- became part of the development plan 2 years or less before the date on which the decision is made;
- contains policies and allocations to meet its identified housing requirement (which can include an allowance for “windfall sites”) ; and
- the local planning authority has at least a 3 year supply of deliverable housing sites and housing delivery was at least 45% of that required over the previous 3 years.

(c) Mid Sussex District Local Plan 2014 – 2031

11. At the time the HKNDP was previously submitted, the District Local Plan was in the latter statutory stages of its progress to formal adoption. The Plan was formally adopted by MSDC on 28 March 2018. It assumes considerable weight in planning decisions as a newly adopted and up-to-date local plan, and provides a framework for neighbourhood plans in the district. It contains 42 policies covering all aspects of development and use of land, as detailed in Appendix A. Several of the policies are of particular importance to the HKNDP, in particular : DP3, DP4, DP6, DP12, DP14, DP16, DP17, DP20, DP21, DP23, DP24, DP25, DP26, DP29, DP30, DP31, DP32, DP34, DP35 and DP37, which are outlined below.

- **DP3** restricts changes of use of shops to other uses in villages such as Horsted Keynes, unless certain criteria are met
- **DP4** proposes the development of 16,390 new homes from 2014-2031 in order to meet objectively assessed needs, together with meeting some unmet need from outside the district in north-west Sussex. This would require 876 new homes every year up to 2023/4, rising to 1,090 thereafter and subject to no harmful impact on Ashdown Forest
- **DP6** sets a settlement hierarchy for the district and generally seeks to steer development to the larger settlements with a wider range of facilities and employment opportunities, and better transport links, as these are the most sustainable locations.

Horsted Keynes is identified as a “medium village” (a third level settlement”) where the policy is “providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation, and community facilities, often shared with neighbouring settlements”.

DP6 sets criteria for the sustainable development of towns and villages within, and contiguous with, defined built up confines. It sets a minimum requirement of 69 dwellings for Horsted Keynes, of which 25 should be provided by 2023/24. There

were already 16 completions and commitments at 1 April 2017, leaving a residual of at least 53 dwellings to be identified.(Updated figures are provided in paragraphs 22-24 below)

- **DP12** protects the character and beauty of the countryside by strictly controlling development outside the built confines of towns and villages, safeguarding the best and most versatile farmland , and the rural landscape
- **DP14** allows small scale economic development in the countryside where it supports sustainable growth , the vitality of the rural economy, and diversification of farm businesses
- **DP16** requires development in the High Weald Area of Outstanding Natural Beauty (AONB) to conserve and enhance the natural beauty of the area, and to have regard to the AONB Management Plan. The whole of Horsted Keynes parish is within the AONB
- **DP17** controls adverse development impact on the Ashdown Forest Special area for Conservation (SAC) and Special Protection Area (SPA), which are European and UK nature conservation designations. These controls seek to manage and mitigate the impact of development in the Forest, a buffer zone of 400 metres immediately around it, and a wider 7 km “zone of influence”. Horsted Keynes parish falls within this wider zone of influence. Mitigation measures include SANGS (Suitable Alternative Green Spaces) and contributions to SAMMS (Strategic Access Management and Monitoring Strategy)
- **DP20** requires developers to provide, or contribute to, the infrastructure and mitigation measures necessitated by their development proposals
- **DP21** requires development to support the objectives of the West Sussex Transport Plan 2011-2026 in achieving a high quality, resilient, accessible and safe transport network and sets out criteria to consider the transport impact of new development
- **DP23** supports provision of high capacity digital infrastructure in new development
- **DP24 and DP25** ,where appropriate, requires leisure and community facilities –such as play areas – in new development, and also provides safeguards against the loss of existing community facilities
- **DP26** requires development to be well-designed and to reflect the distinctive character of its locality , setting out criteria by which these objectives will be assessed
- **DP29** sets out measures to control noise, air and light pollution arising from new development
- **DP30** requires a mix of dwelling types and sizes in new residential development that reflects current and future local housing needs
- **DP31** sets out requirements for provision of 30% affordable housing in residential developments of 11+ dwellings, with a commuted payment for development of 6-10 dwellings in the High weald AONB
- **DP32** allows for rural exceptions housing to provide 100% affordable housing on sites adjacent , or close to , rural settlements, subject to certain criteria

- **DP34** protects listed buildings and other heritage assets, and their settings, and sets requirements for new development affecting such buildings and land. There are over 40 listed buildings in the parish.
- **DP35** requires all development in conservation areas to preserve and enhance their special character. A large part of Horsted Keynes village is covered by a conservation area designation.
- **DP37** supports the protection of trees, woodlands and hedgerows and further planting

(d) Further work by MSDC on identification of potential housing development sites in its Site Allocations DPD

12. The District Local Plan sets out an overall planning strategy for Mid Sussex, including 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 large-scale strategic development allocations at Burgess Hill (2 sites), Pease Pottage (1) and Hassocks (1). Allocation of smaller sites is left to the Site Allocations DPD and/or neighbourhood plans prepared by town and parish councils.
13. Preparation of the Site Allocations DPD has been informed by an extended “call for sites” to landowners and developers and a technical assessment of these sites in terms of their “suitability, availability and deliverability” for development in a Strategic Housing and Employment Land Availability Assessment (SHELAA) (this supersedes a similar exercise by MSDC in 2016). “The call for sites” lasted from October 2017 to February 2018 and led to publication to a revised SHELAA in April 2018. The SHELAA is a background document to assist development of planning policy in subsequent local or neighbourhood plans: it provides a “long list” of potential sites and is not, in itself, a planning policy document. Additional sites have come forward since that time, including some in Horsted Keynes, which have also been assessed. Altogether, some 241 sites across the district were put forward by landowners and developers for assessment by MSDC as part of the “call for sites”. The submitted SHELAA sites in Horsted Keynes are shown in Appendix B. In addition, a number of other sites were put forward as part of the HKNDP’s call for sites and these will also be the subject of sustainability appraisal for this plan .
14. A first stage of site appraisal (MSDC Site Selection Report #1 in September 2018) filtered out sites which were considered either too remote from existing settlements (more than 150 metres from the edge of a settlement) or whose size , and dwelling yield, would be too large for its location within the settlement hierarchy (Local Plan policies DP4 and DP6) .It also excluded very small sites (capable of providing < 5 dwellings) or which had a fundamental planning constraint , such as high flood risk.
15. The second stage involved identification of criteria for site selection in December 2018 (Site Selection Report #2) for the sites which came through the first stage. The criteria identified by MSDC were :

Part 1- Planning constraints	1) High Weald Area of Outstanding Natural Beauty (AONB) 2) Flood risk 3) Ancient woodland 4) SSSI /Local Wildlife Sites /Local Nature Reserves 5) Heritage-listed buildings 6) Heritage-conservation areas 7) Heritage –archaeology 8) Landscape capacity- sites outside AONB 9) Trees / Tree Preservation Orders
Part 2- Developability considerations	10) Highways/strategic road network 11) Local road network/access to site 12) Developability 13) Infrastructure
Part 3- Sustainability /Access to services	14) Education-distance to primary schools 15) Health-distance to GP surgery 16) Services- distance to town/village centre 17) Public transport

16. It makes sense to also use the same criteria for assessing these sites in the HKNDP. The impact of development on each site on the 17 criteria above is then graded , using a “traffic light system, dependent upon its potential impact , using the detailed assessment notes developed by MSDC:

	Very positive impact
	Positive impact
	Neutral impact
	Negative impact
	Very negative impact

17. MSDC considered a draft Site Allocation DPD , accompanying detailed assessment of potential shortlisted sites for housing (Site Selection Report#3) and employment (Site Selection Report#4) , and a Sustainability Appraisal , incorporating a Strategic Environmental Assessment in September 25 . This work also took account of additional evidence testing in the findings of Sustainability Appraisal and Habitat Regulations Assessment; input from infrastructure providers and technical specialists, and modelling of traffic and air quality. This led to the conclusions for Horsted Keynes sites summarised in Appendix 3. These conclusions have not yet been the subject of public consultation (which will be 9 October to 20 November 2019), or to independent scrutiny by an examiner, and so may be challenged or modified as the DPD progresses to formal adoption. No allocations for employment use in Horsted Keynes are included in the draft DPD

(e) The Habitat Regulations Assessment (HRA) –European Court of Justice (ECJ) judgement in *People over Wind & Sweetman v Coillte Teoranta (Ireland)* and its impact on appropriate assessments under the Habitats Directive 92/43/EEC

18. In April 2018, the Court of Justice of the European Union delivered its judgment in case 323/17 *People Over Wind & Peter Sweetman vs. Coillte Teoranta ("People over Wind")* concerning a proposed development in Ireland. The judgment clarified that when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures.
19. As a result, a competent authority may only take account of mitigation measures intended to avoid or reduce the harmful effects of a plan or project as part of an appropriate assessment itself. This is a departure from the approach established by domestic case law, which had permitted mitigation measures to be taken into account at the screening stage
20. The decision is relevant to the HKNDP because the Neighbourhood Plan will be subject to assessment under the EU Habitats Directive, and related UK law, due to the proximity of the parish to protected habitats and species at Ashdown Forest. The Habitat Regulations Assessment carried out to support the HKNDP submission in November 2017 needs to be reviewed in the light of the *People Over Wind* case and other relevant changes since that time.

(f) Planning applications in Horsted Keynes since November 2017

21. Over the period from 1 November 2017 to 31 March 2019, some 81 planning applications in Horsted Keynes parish were submitted to MSDC (a few of which were subsequently withdrawn by the applicants). The great majority of these applications involved small scale residential alterations and extensions, tree works, agricultural development, or discharge of planning conditions attached to previous permissions, and most were approved by MSDC.
22. Several applications were larger and more significant, as follows:

Reference	Address	Development proposed	Outcome
DM/17/1262	Westall House , Birchgrove Road	24 X 1 and 2 bed apartments with communal and ancillary facilities and demolition of 16 existing apartments	Approved 23/04/18
DM/17/4913	Land at rear of Peacocks , Church Lane	Outline application for 38 dwellings , including 11 affordable dwellings	Refused 19/06/18 Appeal withdrawn
DM/18/0195	Land at Birchgrove Road	Outline application for 45 dwellings (30% affordable) (Re-submission of DM/17/2345)	Withdrawn 12/06/18
DM/19/0204	Jeffreys Farm , Lewes Road	Outline application for demolition of farm buildings and erection of up to 6 detached dwellings	Withdrawn 12/03/19

DM/19/0957	Jeffreys Farm , Lewes Road	Outline application for demolition of farm buildings and erection of 5 detached dwellings	Refused 31/05/19 Appeal lodged
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23. This demonstrates continuing pressure for residential development on sites on, or close to, the edge of the village of Horsted Keynes in the absence of site specific housing development allocations in either the Mid Sussex Site Allocations DPD or the NDP, over the period since November 2017. The land at the rear of Peacocks was the subject of a fresh application for 9 dwellings in August 2019 (Ref: DM/19/2942) which was refused by MSDC on 23 September 2019.

(g) The housing land supply position in Horsted Keynes Parish

24. Policy DP6 of the Mid Sussex Local Plan sets out minimum housing development requirements in Horsted Keynes parish over the period from 2014 to 2019 at 69 dwellings. , of which 25 dwellings should be provided by 2023/24. At the time of the District Plan's formal adoption in March 2018, there were 16 completions and commitments in the parish. Of these , 12 commitments were derived from a planning permission for the conversion of an existing hotel at Ravenswood (in the north of the parish) to residential accommodation (Application DM/15/2013) . This planning permission lapsed since implementation had not begun by June 2019.
25. At the present time, there are 7 completions and commitments as set out below, leaving at least 62 further dwellings to be identified and delivered over the District Plan period.

Reference	Address	Number	Status
DM/14/01199	Adjacent 8 Church Cottages, Church Lane	1	Completed
DM/14/04673	The Barn , Birchgrove	1	Completed
DM/15/0203	Land south of Hamsland House	1	Completed
DM/16/0312	Broadhurst Stables	1	Completed
DM/16/3169	Hamsland(Old Dairy)	1	Commitment
DM/16/3172	Hamsland (Stables)	1	Commitment
DM/19/1910	Valley Farm Cottage , Danehill Road	1	Commitment

26. The planning permission granted above at Westall House(DM/17/1262) contains residential development with an element of communal or institutional use (Use class C2) , so cannot be counted towards the minimum housing requirement in policy DM6.

(h) A new Local Housing Needs Survey carried out by Action in Rural Sussex (AiRS)

27. A Housing Needs Survey was carried out across the parish in April and May 2019 and the results were published in September 2019. The survey was commissioned by the Community Land Trust (see paragraphs below) and carried out by Action in Rural Sussex (AiRS). Some 645 forms were sent out , of which 167 (26%) were returned. The key findings

from the survey – which represent a snapshot of an ever-changing position - were as follows:

- *24 households are in need of affordable housing due to the inadequacy of their current housing in meeting their needs and their inability to afford to rent or purchase a suitable property on the open market within the immediate area. All of these households possess a local connection to the parish.*
- *Of those in need, three-quarters (75%) are single adults aged between 18 and 64. The vast majority of these were living with parents/friends/family and are seeking to set-up an independent home.*
- *The preferred (and most suitable) tenure for a majority of the households identified as being in need of affordable housing is renting from a housing association or a local authority.*
- *Whilst six of the households in affordable housing need expressed a preference for shared ownership, eligibility will depend upon the particular model of shared ownership or shared equity that might be available on a scheme by scheme basis.*
- *An overwhelming majority of households in affordable need (87.5%) require one bedroom properties. This reflects the high proportion of single adult and adult couple households who represent the vast bulk of those identified as being in-need.*
- *Housing need is a pressing one for most of the respondents to the survey with just over half of the in-need households identifying a need to move now or within two years, with three-quarters (of all in-need households) identifying a need to move within the next 5 years.*
- *Four respondents identified that they have specialist housing requirements, with some indicating a need for more than one.*
- *Only one in five (20%) of those households identified as being in need of affordable housing are currently on the local authority housing register.*

(i) Establishment of a Community Land Trust (CLT) In Horsted Keynes

28. A CLT is a community-led organisation that provides land, homes and other assets to meet the long-term needs of its local community. There are around 180 Community Land Trusts in England and Wales. These Trusts deliver everything from homes to meeting spaces, workspaces, shops, pubs, farms and gardens. The potential benefits of CLTs are:

- Being locally-controlled and democratically accountable
- Being flexible to meet local priorities
- Creating community support
- Providing locally affordable homes
- Delivering actions from community / neighbourhood plans
- Closer community & landowner involvement

- Generating re-investment for the community
- Enabling the long term stewardship of community assets

29. A Horsted Keynes Community Land Trust, whose “area of benefit” will cover the entire parish, is being set up. It is expected to be formally registered as a “community benefit society” with the Financial Conduct Authority in autumn 2019. It is understood that delivery of community-led housing to meet the specific local housing needs of the parish will be a priority for the new CLT.

(j) Progress on neighbourhood plans in neighbouring parishes

30. Horsted Keynes abuts the following parishes: Ardingly, Lindfield/Lindfield Rural and West Hoathly (Mid Sussex)and Danehill and Fletching (Wealden District). A comparison of the position on neighbourhood plans in these parishes between November 2017 and September 2019 is set out below. Overall , there has been no change either in newly made neighbourhood plans , reviews of neighbourhood plans, or commencement of new neighbourhood plans

Parish	NP position at November 2017	Position at September 2019
Ardingly	Plan made March 2015	No change
Lindfield	Plan made November 2016	No change
West Hoathly	Plan made April 2015	No change
Danehill	No application for designation	No change
Fletching	No application for designation	No change

(k) High Weald AONB –Management Plan 2019-2024 and draft Design Guide for housing development

31. The **High Weald AONB Management Plan** is the single most important document for the AONB. It sets out long term objectives for conserving this nationally important landscape and the local authorities' ambitions for the High Weald over the next five years. An updated Management Plan for the period 2019-2024 was published in July 2019.
32. Local authorities with land in an AONB, including Mid Sussex, are legally obliged under the Countryside and Rights of Way Act 2000 to produce an AONB Management Plan, and the Plan is formally adopted by the relevant local authorities as their policy for the management of the AONB and how they carry out their functions in relation to the statutory requirement for its protection.
33. Pressure for change, and the need to accommodate growth, in this sensitive landscape led to the publication of a draft **Design Guide for housing development for consultation between June and August 2019**. The High Weald AONB Partnership, including the 15 local planning authorities, has prepared a draft Design Guide for new housing development in the High Weald. Following consultation it is intended that a revised version will be agreed by the Partnership and adopted by the local planning authorities as a material consideration in the determining of planning applications within the High Weald AONB.

34. The Guide is aimed at all those involved in housing developments within the High Weald AONB, from designers, developers and highways engineers, through to planning decision makers, so they can meet the requirements of the National Planning Policy Framework for well-designed places and the conservation and enhancement of the AONB. It aims to give clear, succinct, practical and consistent advice on design expectations for new housing development within the High Weald AONB. This will enable higher quality and landscape-led design that reflects intrinsic High Weald character and is embedded with a true sense of place, without stifling innovation and creativity.

(l) The independent review of National Parks and AONBs

35. On September 25 2019, the final report of the “Landscapes Review” was published. This is an independent review of the future of England’s protected landscapes (National Parks and AONBs), led by Julian Glover and commissioned by the Government. This recommended “new protections, responsibilities, titles and funding for AONBs to help them be greener, more beautiful and more welcoming to the public”. The Government will consider the Glover recommendations and formally respond in due course, after which the particular implications for the High Weald AONB will need to be assessed.

(m) Updated supporting documents for the Horsted Keynes NDP

36. The Neighbourhood Plan Regulations require the following documents to be provided to the local planning authority when the plan is formally submitted to them :
- **Sustainability Appraisal** : a systematic process that assesses the extent to which an emerging plan , when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives
 - **Habitat Regulations Assessment**: identifies any aspects of an emerging Local Plan or Neighbourhood Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects), and to identify appropriate avoidance and mitigation strategies where such effects were identified. This is required because of Horsted Keynes’ proximity to the Ashdown Forest SAC and SPA
 - **Basic Conditions Statement** (describes how the proposed plan and its planning policies relate to national planning policies and policies in the relevant local plans produced by the local planning authority)
 - **Public Consultation Statement** (describes the persons and bodies who were consulted about the plan and how they were consulted ; summarises the main issues and concerns raised by persons consulted; and how those issues and concerns were addressed in the draft plan)
37. The first two of these – the Sustainability Appraisal and HRA- are being updated as part of the current review of the NDP and will be published for public consultation alongside the revised plan. The Basic Conditions Statement and the Public Consultation Statement will be updated after consultation and prior to submission to the local authority.

APPENDIX A POLICIES IN THE MID-SUSSEX DISTRICT LOCAL PLAN 2014-2031

DP1: Sustainable Economic Development

DP2: Town Centre Development

DP3: Village and Neighbourhood Centre Development

DP4: Housing

DP5: Planning to Meet Future Housing Need

DP6: Settlement Hierarchy

DP7: General Principles for Strategic Development at Burgess Hill

DP8: Strategic Allocation to the east of Burgess Hill at Kings Way

DP9: Strategic Allocation to the north and north-west of Burgess Hill

DP10: Strategic Allocation to the east of Pease Pottage

DP11: Strategic Allocation to the north of Clayton Mills, Hassocks

DP12: Protection and Enhancement of Countryside

DP13: Preventing Coalescence

DP14: Sustainable Rural Development and the Rural Economy

DP15: New Homes in the Countryside

DP16: High Weald Area of Outstanding Natural Beauty

DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)

DP18: Setting of the South Downs National Park

DP19: Sustainable Tourism

DP20: Securing Infrastructure

DP21: Transport

DP22: Rights of Way and other Recreational Routes

DP23: Communication Infrastructure

DP24: Leisure and Cultural Facilities and Activities

DP25: Community Facilities and Local Services

DP26: Character and Design

DP27: Dwelling Space Standards

DP28: Accessibility

DP29: Noise, Air and Light Pollution

DP30: Housing Mix

DP31: Affordable Housing

DP32: Rural Exception Sites

DP33: Gypsies, Travellers and Travelling Showpeople

DP34: Listed Buildings and Other Heritage Assets

DP35: Conservation Areas

DP36: Historic Parks and Gardens

DP37: Trees, Woodland and Hedgerows

DP38: Biodiversity

DP39: Sustainable Design and Construction

DP40: Renewable Energy Schemes

DP41: Flood Risk and Drainage

DP42: Water Infrastructure and the Water Environment

APPENDIX B

SITES PUT FORWARD IN “CALL FOR SITES” TO MID SUSSEX DISTRICT COUNCIL 2017-19

The sites put forward, in and around the village, through MSDC’s SHELAA process are shown in the map below and are as follows below:

663- Field 1 - Ludwell Grange, Keysford Lane
664 – Field 2 - Ludwell Grange, Keysford Lane
837- Land at Little Oddynes Farm, Waterbury Hill
67 - Castle Field, Cinder Hill Lane
893 – Land west of Church Lane (Sledging Field)
748 -The Old Rectory, Church Lane

945 – Land at Lucas Farm, Birchgrove Road
781- Land south of Robyn's Barn, Birchgrove road
216 – Land at Police House Field, Birchgrove Road
807 – Land south of Police House Field
184 – Land south of St Stephen's Church
68 – Farm buildings, Jeffrey's Farm
69 - Land at Jeffrey's Farm (north)
971- Land at Jeffrey's Farm south)

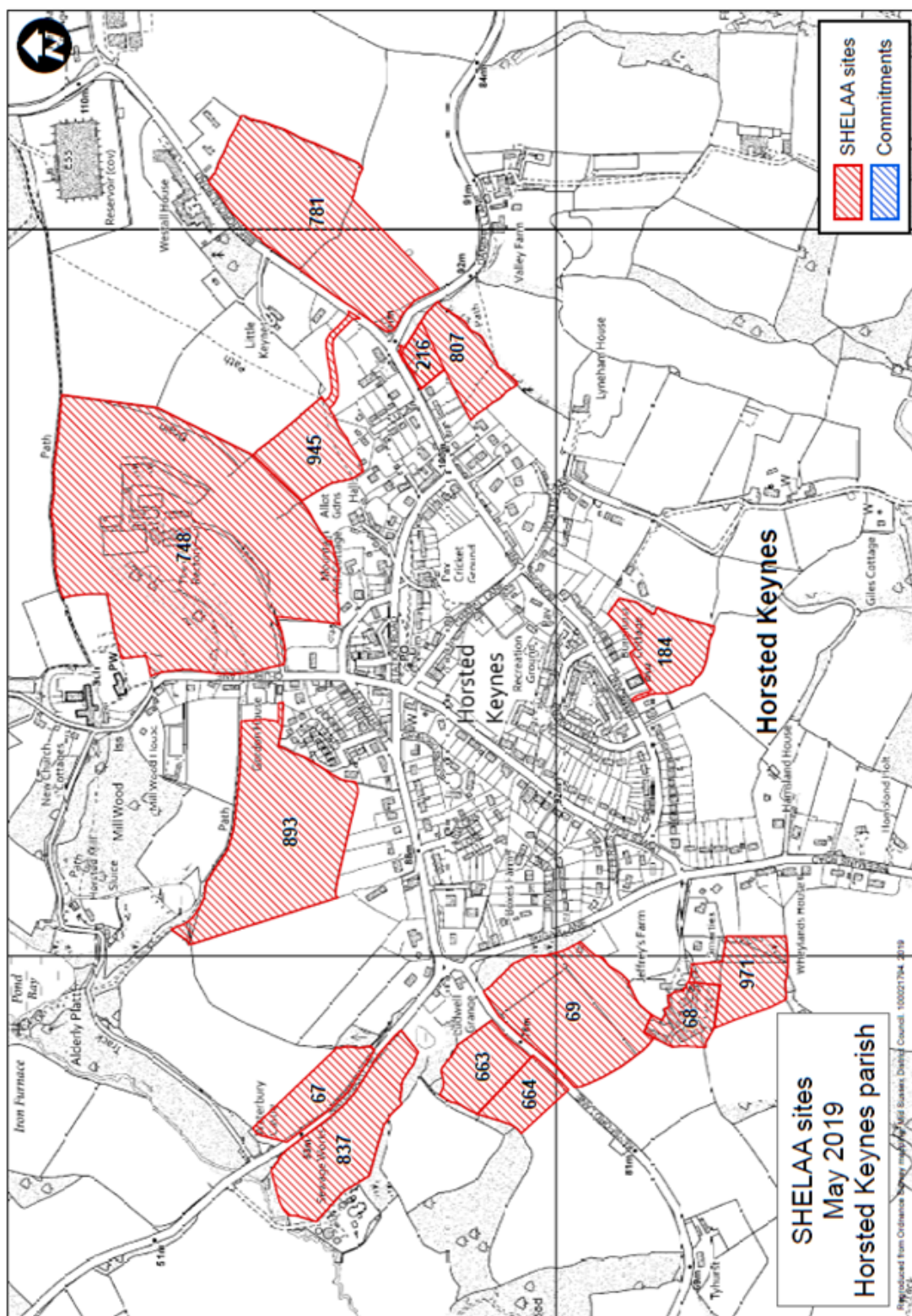
In addition, there were three other sites put forward elsewhere in the parish as follows:

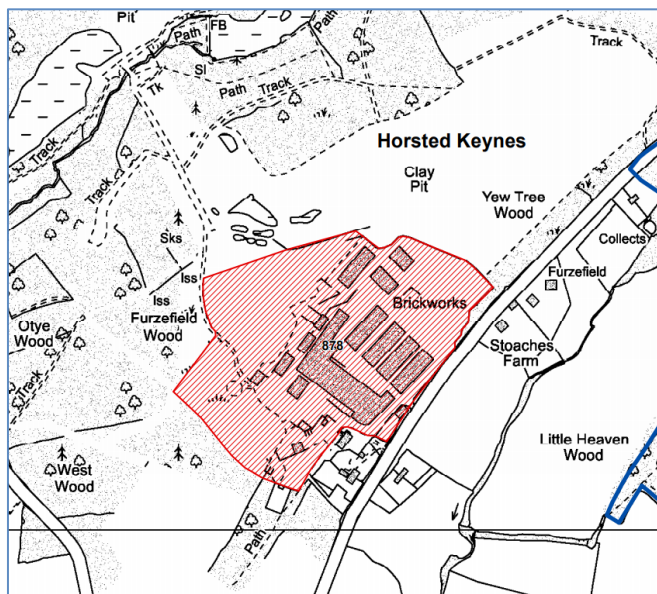
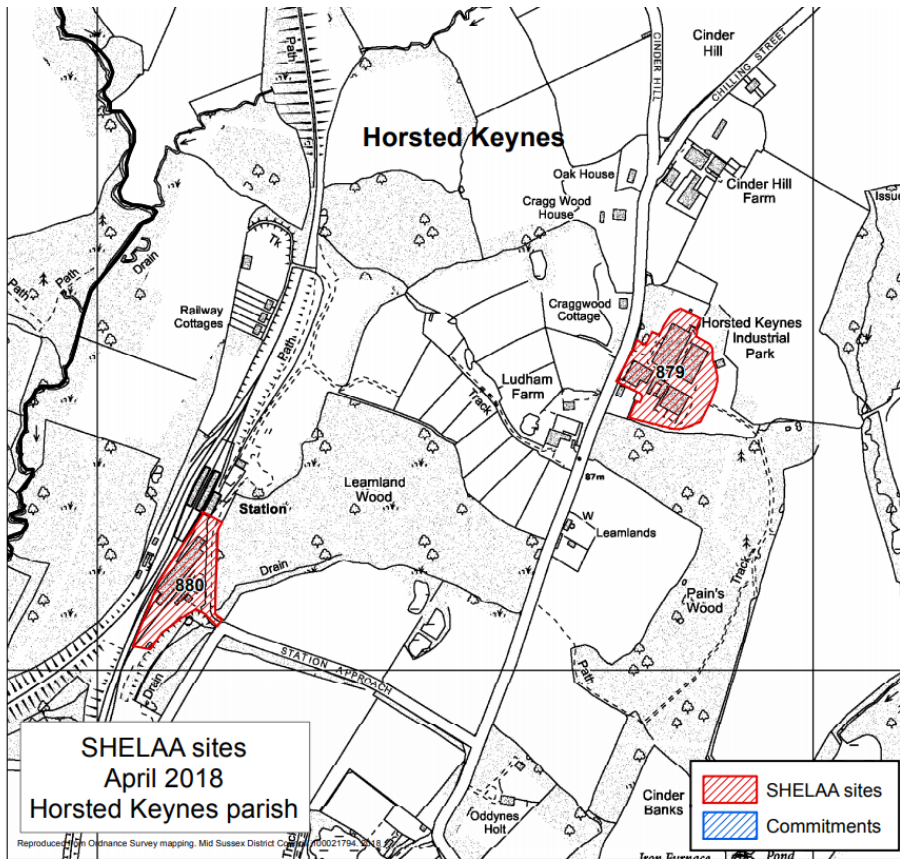
878- Freshfield Brick Works, Freshfield Lane

879- Horsted Keynes Industrial Park

880 Horsted Keynes Station (Bluebell Railway)

All three sites were put forward for employment use.





APPENDIX C

SUMMARY OF SITE ASSESSMENT BY MSDC FOR SMALL SITE ALLOCATIONS DPD (CONSULTATION DRAFT) SEPTEMBER 2019

Settlement: Horsted Keynes

Settlement hierarchy tier: Category 3 (Medium sized village providing essential services)

Total number of SHELAA sites: 14

SHELAA sites not considered further following the **high level site assessment**

SHELAA ID	Site address	Units	Comment
67	Castle Field, Cinder Hill Lane, Horsted Keynes	25	Not compliant with the District Plan Strategy
663	Field 1, Ludwell Grange, Keysford Lane, Horsted Keynes	27	
664	Field 2, Ludwell Grange, Keysford Lane, Horsted Keynes	15	
837	Land at Little Oddyness Farm, Waterbury Hill, Horsted Keynes	45	

SHELAA sites not considered further following **detailed site assessment**

SHELAA ID	Site address	Units	Comment
68	Farm buildings, Jeffreys Farm, Horsted Keynes	6	Difficulties achieving safe access.
69	Jeffrey's Farm Northern Fields (Ludwell Field adj Keysford and Sugar Lane)	22	Development considered likely to have a high adverse impact on the AONB.
748	The Old Rectory, Church Lane, Horsted Keynes	30	Development considered likely to have a high adverse impact on the AONB.
781	Land to the south of Robyns Barn, Birchgrove Road, Horsted Keynes	45	Development considered likely to have a high adverse impact on the AONB.
893	Land west of Church Lane, Horsted Keynes	38	Development considered likely to have a high adverse impact on the AONB.
945	Lucas Farm, Birch Grove Road, Horsted Keynes	30	Development considered likely to have a high adverse impact on the AONB.
971	Jeffrey's Farm Southern Fields	20	Development considered likely to have a high adverse impact on the AONB.

SHELAA sites not considered further following the **further evidence testing**

SHELAA ID	Site address	Units	Comment
216	Land at Police House Field, Birch Grove Road/Danehill Lane, Horsted Keynes	0	Now forms part of a larger site (i.e. part of Site 807 - Land south of the Old Police House, Birchgrove Road, Horsted Keynes).

SHELAA sites taken forward as **proposed allocations in the DPD**

SHELAA ID	Site address	Units	Comment
184	Land south of St. Stephens Church, Hamsland, Horsted Keynes	30	See Appendix B for further site details
807	Land South of The Old Police House, Birchgrove Road, Horsted Keynes	25	