

DOCUMENT B

**HORSTED KEYNES
NEIGHBOURHOOD DEVELOPMENT PLAN**

**Summary of responses to Regulation 14 public consultation held
between 12 October and 7 December 2020**

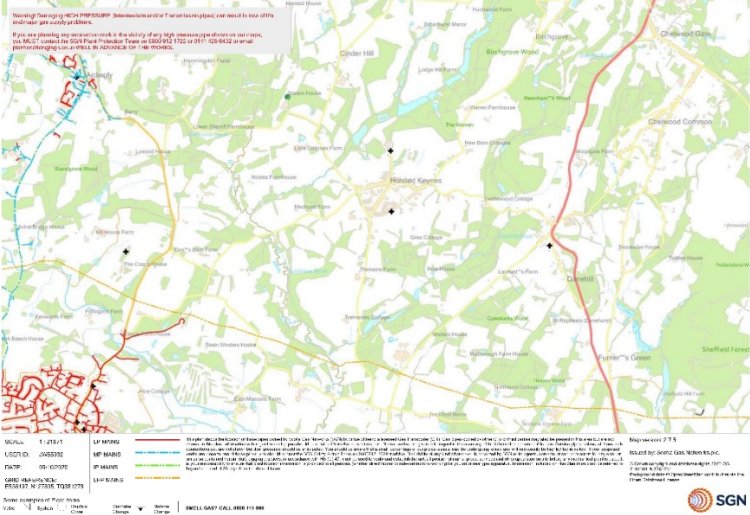
Horsted Keynes Parish Council

January 2021

Horsted Keynes Parish Neighbourhood Plan – Summary of Representations (2020) as at 07 DEC 23:59

Ref#	Cmt#	Respondent	Organisation	On behalf of	Comment
001	001	Dawn Langston	Mid Sussex Voluntary Action		Mid Sussex Voluntary Action is not a statutory body but a charitable organisation and therefore we would not be looking to comment on any part of the neighbourhood plan process.
002	001	James Wardlaw	Scotland Gas Network	Southern Gas Network	<p>For background information, SGN own and operate the network that delivers natural and green gas to 5.9 million homes and businesses across Scotland and the south of England. Our responsibility is to deliver gas safely, reliably, and efficiently to our customers. We also provide the 24/7 gas emergency service, responding to calls to the gas emergency number (0800 111 999) when there is a reported smell of gas or a gas safety issue.</p> <p>We are regulated by Ofgem, a department of the UK government that administers the price control regime that ensures our returns are fair on the basis of efficient operation, delivery of agreed outputs, and value to consumers. Our current price control, known as 'RIIO-GD1', spans an eight-year period from April 2013 to March 2021, with our next price control, <u>RIIO-GD2</u>, due to commence in April 2021.</p> <p>With regards to Horsted Keynes, the village is located within a 'no gas' area, remote from the existing gas network which is approximately 3.5km away.</p>

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003	001	Amanda Purdye	Airport Safeguarding	Gatwick Airport Ltd	<p>Horsted Keynes is outside of our current 'physical' 15km safeguarding area, therefore there are only two areas that we would need to comment on as follows:</p> <p>Wind Turbines: Horsted Keynes is within our 30km wind turbine circle. Wind turbines, depending on their height and location, have the potential to impact on airport radar by way of their height and the rotation of the blades. Therefore, we would need to be consulted with regard to any proposals for wind turbines in this area.</p> <p>Cranes: From 31 May 2021 Horsted Keynes will be within our notification area for cranes. This will mean that any cranes over 10m or higher than the surrounding trees and buildings will require a permit from the airport operator via the CAA. For further details please refer to caa.co.uk and search for CAP1096 'Guidance to Crane users on Aviation Lighting and Notification' for further details.</p>
004	001	Tim Westlake	Resident		<p>Looking at the neighbourhood plan I understand the need for some more village housing but in moderation.</p> <p>The Sheela sites May 2019 - Site 216 seems logical. It is fronting the road and there used to be a barn / building in that location. The same applies to the old Catholic church site.</p>

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					<p>Site 807 is an appalling idea for development. Its regularly used by walkers, has a public footpath going through it and telegraph poles dissecting it. The traffic flow would be very dangerous as well.</p> <p>Please do not let this become another sledging field nightmare for years on end damaging property values for no reason and upsetting the entire neighbourhood.</p>
005	001	Phil Miles	Horsted Keynes Community Land Trust Feasibility Group		<p>The Horsted Keynes Community Land Trust would like to thank the Parish Council for consulting us on the revised Neighbourhood Plan.</p> <p>We are very pleased to note that the amended version now includes policy and text in support of community led housing. However, we note that the criteria for the location of a potential Community Led Housing (CLH) site is the same under H2 as that for market housing under H1, i.e.: "suitable sites within, or - if less than 10 units - contiguous with, the built-up boundary". Whilst the text refers to Rural Exception Sites, the policy itself does not specifically support CLH on such a site.</p> <p>We therefore suggest amending clause H2 to read as follows:</p> <p>Proposals for 100% community-led housing development will be supported on suitable sites within, or - if for less than 10 units - contiguous with, the built-up boundary of Horsted Keynes village, or on a Rural Exception Site, where they:</p> <p>We would like to thank the Parish Council, and all those involved, for their hard work in producing this plan and look forward to the potential opportunity of working with them on a scheme in the near future to deliver some much needed and genuinely affordable homes in Horsted Keynes.</p>
006	001	Claire Tester	High Weald AONB Unit		<p>Thank you for consulting the High Weald AONB Unit on this neighbourhood plan.</p> <p>The support for Community Led Housing (CLH) under H2 is welcomed. Protected landscapes such as the High Weald AONB have a particularly urgent need for affordable housing due to high land values and because many of the people employed in the land-based sector that supports good management of the AONB cannot afford homes on the open market.</p>

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					<p>However, we note that the criteria for the location of a potential CLH site is the same under H2 as that for market housing under H1, ie: "suitable sites within, or - if less than 10 units – contiguous with, the built-up boundary". The practical implication of this is that CLH developments will be in direct competition with those who wish to progress open market housing – pushing land values out of reach of CLH groups.</p> <p>The Mid Sussex District Plan policy DB32 for rural exception sites allows such development where "it is adjacent to, or in close proximity to a rural settlement containing local services". By definition rural exception sites are those where an exception is made to normal planning policies that would prevent housing on the site. It is recommended that H2 be amended to allow CLH schemes to come forward on sites 'in close proximity' to Horsted Keynes rather than just those that are within or contiguous with the built-up area boundary.</p> <p>The text of paragraph 6.12 is generally supported. However, due to further research being undertaken on behalf of the High Weald AONB Unit on the history of Horsted Keynes, it is recommended that the text under the heading 'Settlement' be amended to:</p> <p style="text-align: center;"><u>Settlement: the main settlement is the village of Horsted Keynes, which originated in Saxon times on a knoll to the north of the current village with the oldest part being where the parish church of St Giles, dating back to the 11th century, now stands. A separate and later trading settlement then grew up around the commons and intersecting routeways to the south, and now forms the main part of the village.</u> There are also small hamlets (Birch Grove, Cinder Hill and Freshfield) and over thirty historic farmsteads dispersed across the parish dating from medieval periods to the nineteenth century.</p> <p>The wording of HK9: High Weald AONB is strongly supported and will help to ensure that this nationally designated landscape is conserved and enhanced as required under Section 85 of the Countryside and Rights of Way Act 2000 and paragraph 172 of the NPPF.</p> <p>The above comments are advisory and are the professional views</p>


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					of the AONB Unit's Planning Advisor on the potential impacts on the High Weald landscape. They are not necessarily the views of the High Weald AONB Joint Advisory Committee.
007	001	Phil Miles	Resident		<p>I confirm my support for this plan, and I would like to thank the Parish Council and all those involved in preparing it.</p> <p>I would like to suggest the following amendments:</p> <ol style="list-style-type: none"> 1. The last line in the table in item 10 reads: "<i>The setting up of a CLT has now been completed</i>" I suggest changing this to the same wording as is currently included in item 5.9: "<i>A Horsted Keynes Community Land Trust (CLT) is currently being formed</i>". 2. I welcome the addition in HK10 to the protection and improvement of non-statutory natural habitats and in particular the protection of our Local Wildlife Sites. However, I would like to see this protection strengthened by not only protecting the sites from the impact of development (as currently drafted) but also extending that protection to cover the management of the sites and preventing them from being degraded. I suggest making it a requirement that appropriate management plans are prepared and regularly reviewed and updated in consultation with the Sussex Wildlife Trust. 3. I think it would be helpful to include a map showing the location of the non-statutory habitats listed in HK10.
008	001	Mike Kirk	Resident		<p>An excellent attempt to try and meld the opposing factions within the village.</p> <p>I support these excellent documents.</p>
009	001	Sally & Steve Haylock	Residents		<p>We are writing to express our disappointment to learn that despite valid objections from any number of residents to the proposed development at St Stephen's field, the Parish Council appears to support this development in preference to development of Jeffrey's Farm - by far the more suitable and sensible option!</p> <p>Some considerable time ago at the beginning of the proposed Village Plan one of us attended one of the Village Hall meetings and can recall one of the representatives expressing the view that Jeffrey's Farm fell outside the village - news to us and not so good</p>

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					<p>for those folk who live in Treemans Road!</p> <p>It is our sincere hope that common sense will prevail at the end of the day - it makes absolutely no sense to develop off Hamsland where traffic and parking is already an issue and what about all those people who regularly use the Constance Wood field for recreation? In a democratic society we would like to believe that the views of so many local people will be taken into account and not ignored.</p>
010	001	Anonymous	Hamsland Action Group		<p>"The Parish Council's proposed site allocations ignore residents' opposition to St Stephen's Field and only keep opponents of Jeffrey's Farm sites happy"</p> <p>The Parish Council's Vision and Objectives (explained in full in October's P&P) drawn up after "extensive consultation" includes the following objectives that relate to new housing.</p> <p>Objective 3. Meet HK's local housing needs particularly that for younger people</p> <p>But of the two sites selected, the PC have backed the most disruptive site available (St Stephen's field), defying a petition signed by 330 residents in 2019, and again excluded the least disruptive site (Jeffrey's Farm northern field) which is widely supported by residents</p> <p>Objective 5. Reduce the negative impact of traffic and roadside parking</p> <p>But developing St Stephen's field would do the reverse for Hamsland where roadside parking reduces it to one lane creating hold-ups and add 30%+ to Hamsland traffic thereby increasing the risk of delaying emergency services, especially during construction phase.</p> <p>Objective 6. Minimise the adverse environmental effects of new development</p> <p>But developing St Stephen's field threatens many mature trees which now screen the site</p> <p>The draft Plan also lists "the local green spaces" that it intends to "conserve and enhance"</p> <p>But pointedly missing from the list is Constance Wood Field, a significant "local green space" maintained by MSDC for the recreational use of the residents who use it regularly</p> <p>Nowhere does the article explain how allocating a site in the most</p>

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					<p>populous part of the village can be the best way to meet these objectives.</p> <p>Since the consultation workshops in September 2015, the PC's so-called "extensive consultation" has not stopped them making key decisions without consulting residents. Examples are:</p> <ul style="list-style-type: none"> • November 2016: PC refused their consultant's advice to add a Jeffrey's Farm scheme in order to get their minimal housing plan past the planning inspector - the inspector rejected the plan. • May 2019: PC decided to ignore the hostile public reaction to their consultant's inclusion of St Stephen's field in the plan and voted 5-3 to accept his report. • November 2019: PC accepted their consultant's advice to allow MSDC to allocate sites and informed MSDC they supported their allocation of the Police House and St Stephen's sites. <p>From 2015 onwards, the PC have refused to: (a) support the Jeffrey's Farm site or back the owner's attempts to correct MSDC's blatant error in rating site access as "unavailable or very restricted", and (b) challenge the AONB unit's high impact rating on the sole basis that a site west of Sugar Lane would be "out of character with the settlement" (see note B2 overleaf). As MSDC own the land to the west of St Stephen's field, they are not a disinterested party (see note BI).</p> <p>By suppressing the Jeffrey's Farm option and promoting a site rejected by 330 residents last year, the Parish Council is not "giving local people a chance to set the rules" for planning applications as their P&P article claims but caving in to what MSDC want.</p> <p>We must get the PC to redraft their plan so that its housing proposals accurately reflect residents' opinions. The PC have to be able to show that they have taken our views into account or the inspector will throw it out before we even get a chance to vote on it at the Parish referendum. So, as the P&P article says, make your feelings known to hkparishcouncilnp@gmail.com or by post to the Council office behind the village hall. <u>The closing date for comments is Monday 7 December.</u></p> <p>PLEASE DON'T WAIT FOR OTHERS TO DO IT FOR you, DO IT NOW!</p>

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					<p>See schematic of developer's published plan for St Stephen's field</p>  <p>Rydon Homes' plan for St Stephen's field</p> <p>A. Comparisons between St Stephen's field (Hamsland site) and the Jeffreys Farm north site (Jeffrey's site):</p> <ol style="list-style-type: none"> 1. The plan shows a packed site of 30 homes with little green space. With redesign, the whole scheme could fit comfortably into the eastern part of the Jeffrey's site and leave plenty of green space to both west and south. 2. To get to the Jeffrey's site from the Keysford Lane junction, construction traffic would pass 10 homes, but its route to the Hamsland site would pass the same 10 homes plus another 36 via Lewes Road and Hamsland.

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					<p>3. Visibility splays are restricted for traffic exiting the Hamsland site and vegetation there would have to be cleared away exposing even more of a site already very visible to passers-by and residents. By contrast, existing trees and hedgerows hide the Jeffrey's site from view and visibility splays at its Sugar Lane exit would be unrestricted.</p> <p>4. Emergency vehicles trying to access the site of an emergency via Hamsland can be blocked by double-parked vehicles (e.g. waste trucks, gas tankers, ambulances) but the Jeffrey's site has no such problem.</p> <p>5. Although planning authorities seem to favour new developments abutting existing homes, as in the above plan, ordinary people regard this as a bad thing and would more readily accept a far less intrusive site.</p> <p>B. Evidence of Inconsistency and bias in site assessments by MSDC and the High Weald AONB unit:</p> <p>1. MSDC have said that the Jeffrey's site development could lead to westward expansion and, in the case of the chicken farm site, proposed a courtyard style scheme to prevent this. But they have placed no such restriction on the Hamsland site, enabling future expansion onto land they own to the west, i.e. Constance Wood Field. Is this why they have failed to raise similar concerns about future expansion of the Hamsland site to the west or Police House site to the south, failed to accept that gifting/covenanting boundary land (e.g. to the PC) could rule out expansion, failed to change their rating of access to the Jeffreys site to "available" after the owners gave them proof of this a year ago, and failed to advise the AONB unit that part of the Hamsland site's tree boundary would have to be reduced?</p> <p>2. The AONB unit rated the Jeffrey's site high impact because "development would be out of character with the settlement pattern of Horsted Keynes". When the site owners explained how the village had developed since the Second World War, they said their "assessment relates to historic settlement pattern" and "20th century additions to the village are not relevant to this assessment. Nonetheless, the development on the east side of Sugar Lane is of a denser, more consolidated character compared to the dispersed development beyond</p>

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					Sugar Lane." As the east side's character is due to 20 th century additions, their assessment is self-contradictory and therefore invalid. Even if 20 th century additions were relevant aner all, then they must apply the same principle to the site on Hamsland's south side which is lightly developed compared with the densely developed north side.
011	001	Michelle Knight	Resident		<p>I have reviewed what has been put forward as Rydon Homes' plan for St Stephens field.</p> <p>I believe I counted fifty parking spaces. This is simply not enough. The position of the village in relation to surrounding facilities coupled with the low frequency of our only bus route, means that is unsurprising that many households needs one vehicle for each adult occupant; and in the case of teenagers in households as well, this increases the family car requirements.</p> <p>A number of households in Hamsland/Challoners have more than two cars per household, as well as commercial vehicles for those who have one for their work. The pressure of parking is already an issue here, increased recently with the closure of St Stephens car park, and I have witnessed altercations over parking.</p> <p>The development as presented, is simply not adequate.</p> <p>I have also seen nothing about the widening of Hamsland where it sits between Challoners and Lewes Road. This is ESSENTIAL as increasing (say, two cars per house, and thirty properties) the vehicle usage by another sixty cars around a blind bend with high vehicles parked along it, is beyond problematic and in my personal opinion, the council's failure to address this is a disgrace. The development's lack of parking provision and the failure to address the widening of the road to allow vehicles to pass, is a state of affairs which I find to be shocking. I believe that continuing on this course, while failing to address these issues, will be a stain on the council's reputation for many years to come.</p> <p>I am not against the development, per se, but it MUST be done in a responsible manner which makes adequate provision for the people it will house and serve. I can only personally conclude, sadly, that in failing to address these issues, that the Parish Council is ignoring the obvious, despite it being brought up time and time again. The developers must be opposed and pushed back against. They cannot be allowed to make a considerable profit (as this now comes in at below the requirement for</p>

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					mandatory social housing) at a considerable cost of quality of life in this area of the village.
012	001	Tom Romer	Resident		<p>Thank you for your letter explaining the proposal for development at St Stephens field.</p> <p>I like every other resident living on Hamsland am totally against the development. I don't think a worse location could have been chosen.</p> <p>Here are my reasons:</p> <ol style="list-style-type: none"> 1. There is already very limited space for vehicles, 30 new houses with most households now having more than one car is not only going to cause huge congestion on a small narrow roads, with only 1 asses point but will make it even more dangerous for the children that play outside. What's more this will cause huge delays in emergency response vehicles reaching their destinations. 2. Many of us chose to live here because of its peaceful setting, the high noise pollution from building works and then the extra 30 homes could lead to distress and could cause knock on effects for people's mental health. 3. Sadly the old woodland, trees, field and other nature will die due to building works. This will have server effects on the Foxes, badgers, deer, mice, owls and many more animals who call the area their home. <p>I doubt the contractors care nor do the council it all seems to be down to money.</p> <p>If there is anything I can do to help, please let me know. I like every other resident in the village is against this development and will do everything I can to put a stop to it. There are other suitable locations we have suggested yet it appears these have been ignored.</p>
013	001	Tony Sabin	Resident		I having to live in Hamsland, which is now became very congested with moving and parked traffic, making it a one way road in and out with parked cars and vans also a trailer which has not been moved for months makes it difficult for large vehicles to pass, also being a cul-de-sac having to reverse back past six or seven vehicles, The
013	002	Tony Sabin	Resident		Regarding the proposed building of 30 new homes in St Stevens

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					field, The entrance to this site from the Lewis Road is leading to a "Cul-de-Sac" at the present time vehicles are parked all around Hamsland and Challoners most days of the week, most of these own two or three cars including work vans, 30 homes could be possibly 60 extra vehicles, The entrance to Hamsland is due , to parked vehicles makes it a 'one way.' I have had to reverse back past six or seven vehicles to let another vehicle through. The other named sites in the village would have a much better entrance to main village roads ie Jefferies farm site or Police field site. Please listen to the many views of residents who live in Hamsland and Challoners and reconsider other sites that are more practical for emergency vehicles and heavy goods vehicles.
015	001	Sarah Doherr	Resident		<p>I have read the proposals for the two development sites Proposed within our village.</p> <p>Clearly, the Jeffrey's Farm site is the best Proposal.</p> <p>I cannot see any advantage to St Stephen's Field whatsoever.</p> <p>The access through Hamsland and Challoners is already compromised with the amount of cars parked on the roads. A new estate would make the problem so much worse for the residents that already live there and the new proposed residents, due to the huge weight of traffic that the extra people would produce.</p> <p>This would not be an issue at the Jeffrey's Farm Site at all.</p> <p>The Environmental impact at the St Stephen's site threatens many mature trees which is devastating in an age where we are supposed to be planting trees for carbon capture, not destroying them.</p> <p>The Jeffrey's Farm Site has a far less detrimental effect on the environment, so again is the clear choice.</p> <p>I have lived in the village for 11 years and use Constance Wood Field regularly as do many others. This is a local green space that is required to be maintained by the council, which again appears to be a clear reason not to develop this site.</p> <p>I recognise the need for affordable housing throughout the UK but for these developments to take place the whole village is important. Please listen to the views of the many rather than the views of a few. The St Stephen's site has already been rejected last year by 330 people. The job of the Parish Council is to be the advocate for our village views and not to be dictated to by MSDC or what the minority want.</p>

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016	001	Mary Hentschel	Resident		<p>I am writing as a resident of Horsted Keynes and one who has attended a number of local parish council meetings where opinions were expressed by a number of local residents to the parish councillors regarding their strong objections to St Stephen's field. The council has chosen to IGNORE the petition signed by over 300 local residents objecting to this development on a number of grounds, but the council has continued to IGNORE those objections.</p> <p>Alternative sites, namely Jeffrey's Farm northern field site where there is access to two of the main roads through Horsted Keynes thereby eliminating the volume of traffic that would be encountered if Hamsland/Bonfire Lane roads were the main access roads to the proposed new development. Furthermore, the new development would have little impact on the farm site, where trees could be preserved and with easy access to the actual building of the new development via Lewes Road and the main road through HK. You have heard the objections loud and clear, but you have chosen to IGNORE local people setting the rules for their village.</p> <p>Additionally, by NOT listing Constance Wood Field as a 'significant local green space' you are opening up possible further development in an area which is well used by local ramblers and dog walkers. The area around Hamsland/Bonfire Lane/Challoners is over-developed as it stands. The roads are choked with cars and trucks and any additional local traffic through what is essentially a cul-de-sac is not only dangerous for those who live around the area already but will lay the foundation for numerous accidents/disruptions through an already congested area of the village. We do not need any more houses this side of the Lewes Road - we are full!!!!</p> <p>Listen to your villagers and change the proposal site!!!</p>
017	001	Simon Doherr	Resident		<p>I am writing to give my view on the proposed neighbourhood plan with particular attention to the proposed new housing developments.</p> <p>My understanding is that the neighbourhood plan was supposed to reflect the wishes of the residents of Horsted Keynes however it seems that despite overwhelming objections to the St Stephen's field site and support for the far less disruptive Jeffery's farm site the Parish council have decided to dismiss the wishes of a large</p>

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					<p>part of the village and make their own plan.</p> <p>Looking at the current parking crisis along the first half of Hamsland road it is clear that it has now effectively become a single carriage road with cars regularly having to reverse half the length of the road to give way to other users. To add further traffic to this situation is clearly highly problematic and appears to go against the parish councils own criteria of improving the village parking situation. The chaos that would be created during the construction period through site construction vehicles and deliveries could potentially put the residents of Hamsland and Challoners in danger if an emergency situation such as a fire was to arise.</p> <p>I know from direct observation, because I was working in Hamsland at the time, that when the traffic count was set up to measure traffic flow in and out of the site access road to the St Stephens field site it was set up beyond the turning into Challoners thus removing well over 75% of the actual traffic level from the count making it completely inaccurate for submission to planning.</p> <p>I also cannot understand why the Jefferies Farm site has been dismissed as it would be a far less disruptive site both in terms of during construction and ultimately upon completion as it will have two access roads that do not require vehicles to come into the main body of the the village at all. I strongly question the parish councils motives behind not supporting this site. If the Birchgrove site is to be supported, which I do, this is also an edge of village development which has the same minimal disruption advantages of Jeffrey's farm.</p> <p>I believe that if these two edge of village developments are rejected by the parish council and the St Stephen's field supported then it is a clear case of "dumping" new development onto the poorer part of the village to appease a very vocal minority and MSDC rather than based on choosing the most appropriate site for the village.</p>
018	001	Andy Bliss	Resident		<p>Thank you for inviting comments.</p> <p>I have read through the draft Neighbourhood Plan and also the Site Appraisal document below it on the relevant website page.</p> <p>Please can you clarify whether you are inviting comment just on the first document or also on the Site Appraisal, Sustainability</p>

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					<p>Appraisal, Habitats Regulations and Updated Evidence Base. These would all appear to be documents which underpin the Neighbourhood Plan but is not clear if you are formally consulting on these too.</p> <p>Please can you let me know so that I can ensure that I confine my brief comments only to the document/s that are being consulted on.</p> <p>Response: You may wish to comment on the information included in all the documents, or the way we have used that information to inform the conclusions drawn in the various assessments.</p>
019	001	Sue Karle	Resident		<p>I am writing to object to any proposal to build on land behind St Stephen's Church.</p> <p>The cul de sac that is Hamsland, Challoners and Home Farm Court is so crammed full of cars, as it stands at present, that getting through at times is almost impossible. Add to this mix, emergency vehicles, and there could well be a tragedy, because they might not be able to gain access.</p> <p>Added to this, the situation that would arise because of construction traffic would only make things worse, as would the addition of a further approximately 60 cars.</p> <p>I understand that development on this site would involve the removal of some mature trees. This, in itself, is something that should not be allowed.</p> <p>Building on this site could put at risk, the further development of Constance Wood Field, which is adjacent to the St Stephen's site, and is owned by MSDC. This green space is much valued by villagers.</p> <p>If this were the only site available in Horsted Keynes, it might be understandable, but it is not.</p> <p>Jeffreys Farm has a brown field site that has repeatedly been turned down for no logical reason, and a former plan for a larger site on an adjoining field, which would have met the villages obligation to provide more affordable housing for years to come, but was similarly refused permission.</p> <p>Either of these would hardly be visible from any part of the village or the adjacent roads because of the large trees and hedges that would screen any development. Part of the original plan would</p>

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					also have provided a green space in the form of a wildflower meadow, which we should welcome for diversity, wildlife and pollinators. At this time, we should give high priority to sustainability and conservation. Access would be straightforward, with only an area of hedge being lost, to create the required access.
020	001	Gary Slade	Resident		I wish to register my objection to the two options put forward for development, in particular the St Stephen's field. Quite simply the road is not wide enough to support a material increase in housing, and even with the highways commission moving the road to widen it, (at what cost to the local residents) would still not be wide enough with cars parking on the road. There is also the very real possibility that MSDC will then "approve" the own land for development. Jeffreys Farm is bar far the most logical use and any impact on to wildlife could relatively easily be addressed with replacement of hedgerows. The road could easily take more traffic, safely, with thought, there is also precedent for addressing challenging access, for example the development in Ansty, entering DIRECTLY onto the A272. With such local push back on your plans, I would urge the Parish Councilors to take on board the sentiment of the large number of villagers opposed to St Stephen's field.
021	001	Pamela Hurwitz	Resident		We do appreciate how hard you have worked to prepare a neighbourhood plan for housing. I honestly believe that the push to put so many houses into St Stephen's field is not correct in terms of village logistics and traffic. Jeffreys farm site remains the most desirable, workable, and frankly least contentious option for most people in this wonderful neighbourhood. The opposition to this proposal is well based, substantial and far outweighs any negative points put forward by the minority who are objecting to the development of Jeffreys Farm.
022	001	Jeremy Humphries-Davies	Resident		As more and more people will be working from home going forward, the issue of no mobile signal in the village is becoming more acute. Could I ask if there are plans to revisit a mast site somewhere in the village for potential installation?
023	001	Amanda & David	Resident		We confirm our full support for the draft Neighbourhood Plan.

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		Harrad			
024	001	Mr & Mrs MK Macnaughton	Resident		<p>We live opposite St Stephens Church and object on the following grounds.</p> <p>Objective 3 - Meet HK`s local housing needs particularly for younger people.</p> <p>The Parish Council have backed the most disruptive site available, St Stephens Field, even after a petition was signed by 330 residents in 2019, and once again excluded the least disruptive site, Jeffreys Farm northern field, which is widely supported by all.</p> <p>Objective 5 - reduce the negative impact of traffic and roadside parking.</p> <p>But developing St Stephens field would do the reverse for Hamsland where roadside parking reduces it to one lane, creating hold ups and add 30% to Hamsland traffic and increases the risk of delaying emergency services, especially during a construction phrase.</p> <p>Are you aware that people already park in Lewes Road due to the parking congestion? Please take a walk down Hamsland at different times of the day to see the current traffic issues already in place.</p> <p>Objective 6 - Minimise the adverse environmental effect of the new development.</p> <p>But developing St Stephens field this threatens many mature trees which now screen the site. With the houses opposite already on a bank how would you screen the proposed new development.</p> <p>The draft plan also lists the local green spaces that it intends to conserve and enhance.</p> <p>But missing from the list is Constance Wood field, a significant local green space maintained by MSDC for the recreational use of residents who use it regularly.</p> <p>Nowhere does the article explain how allocating a site in the most populated part of the village can be the best way to meet these objectives.</p> <p>By suppressing the Jeffreys Farm option and promoting St Stephens Field, the parish council is not giving local people a chance to set the rules for planning applications as their P&P article claims but caving into what MSDC want.</p>

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					We would ask the PC to redraft their plan so that its housing proposals accurately reflect residents' opinions.
025	001	Patricia Parlour	Resident		<p>I wish to register my objection to the Parish council's proposed housing allocation plan.</p> <p>The St Stephen's field site is an over development given that it is accessed through a cul-de-sac - Hamsland. Additional traffic would be dangerous for pedestrians. The homes in Hamsland & Challoners are predominately family homes and therefore you would be putting children at significantly greater risk due to traffic increase and - with any road widening schemes made to accommodate the increase in traffic - would make the footpath's narrow and more dangerous for children playing.</p> <p>In addition, I do not consider the Parish council have adequately considered the Jeffrey's Farm site where access is safer, and development would be unseen from footpaths around the village.</p> <p>Another point I would like to record my objection to is the failure to include Constance Wood Field as a local green space. It clearly is a space used significantly by residents from all over the village. It was included in a wildlife project recently and has one of the village's dog waste bins. Loss of this field would mean more dogs using the recreation field and the cricket field.</p> <p>To leave the Constance Wood field out of the significant green spaces list would not be a service to Horsted Keynes.</p> <p>I do not believe that the proposed housing plan reflects residents' views given the clear objections at the Parish council meetings and the petition against the plan and you should withdraw it.</p>
026	001	Caroline & William James	Resident		<p>As invited, please see our thoughts on the current proposal. We have reviewed the plan at a very high level before making these comments.</p> <p>We object to the plan to build houses on St. Stephens field, due to the impact it will have on the traffic throughout Hamsland. Today we walked through this area and as you can see there are tyre marks on the verge where vehicles presumably were not able to pass. Having closed off the car park outside the Church is already putting more pressure on on-road parking making the area even more congested. There are now very few places cars can pass.</p> <p>In our view, instead of digging up beautiful lush green fields and felling trees, there appears to us to be an appropriate alternative</p>

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					<p>site to re-purpose buildings on Jefferies farm, we realise that we are far away from the details that the Team have been working on, but honestly we cannot see the objections to re-developing farm buildings now not in use.</p> <p>We appreciate the time and effort taken by HK Parish council members in the many tasks that it takes in maintaining and enhancing the Village, keeping the ambience and character.</p>
027	001	Mr. B.R. Oliver & Mrs. R. Pearman	Resident		<p>We congratulate the council on finally reaching the Reg 14 stage again. This complicated process has taken an inordinate amount of time and effort. We would like to place on record our appreciation of the Parish Council for their determination to see this through in spite of multiple difficulties, and in particular the Chairman, Cllr. Colville and Cllr. Webster for their sterling work. We also commend Mr Frost for the professional approach to the process and the documentation.</p> <p>Given the various competing views in the village, it was a wholly sensible and pragmatic approach to put forward two sites which the District Council also propose. Police House Field has substantial support locally. The Hamsland site is more contentious. A leaflet from a sadly anonymous source called the "Hamsland Action Group" which has appeared through the letter box, is opposed to the site. The main contention is access and parking, but I note that MSDC recognise the issue, and consider that it is not unsurmountable. Far better that we follow their lead and work with them to resolve the access and parking problems. If not solvable, the site will not go ahead.</p> <p>Both sites offer the prospect of either including smaller units of affordable housing or the possibility of engaging with the Horsted Keynes CLT to bring forward truly affordable housing to meet the established and recently confirmed local requirement.</p> <p>As regards the document itself, the following observations are just suggestions which you may like to consider, and are offered in all good faith in an attempt to be of assistance.</p> <p>1.2 The HKNSPG were initially involved, but the P.C. later brought it in-house, so should it read "<i>The Plan was initially prepared....</i>"? (I accept that the situation is further clarified in 1.4)</p> <p>2.19 Suggest "<i>A new, comprehensive Housing Needs Survey was....</i>:" to reflect that it was supported by MSDC and conducted through AIRS, not just locally run, and to reinforce that the</p>

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					<p>requirement in the village is for 1/2 bed units of affordable housing.</p> <p>2.23 Possibly, where describing an hourly service for the 270, refer to it as "day only" or similar, to emphasise that it is not available very early morning or late evening. Purpose, not to make it appear that the village is more sustainable in terms of public transport than it really is. Again, it is noted later that is the case.</p> <p>2.36 An excellent subsection which needs to be highlighted to HAG with regard to their concerns over the Hamsland site, and shows the value of working in tandem with MSDC. 3.3 reinforces this.</p> <p>5.35 Refers to the "13th century church". The Sussex Parish Churches Register describes it as 11th century and there are identifiable elements of that period within the fabric; maybe using the earlier date makes it even more important in an historical sense, regardless of the Grade 1 listing?</p> <p>6.12 Due to the relative proximity to a hotly contested potential site, the Sledging Field, might "<i>Mill Wood</i>" be included in this list?</p> <p>POLICY HK9: Second bullet point "<i>respects the settlement pattern of the parish and uses local materials and wood fuel systems.</i>". Is this good practice now given the recent debate about wood burning stoves, admittedly more especially in urban environments?</p> <p>Finally, we commend the approach of just meeting the OAN figure and not exceeding it significantly. If it did, it would potentially create problems for future plans.</p>
028	001	Alan & Peggy Rothwell	Resident		<p>Thank you for the opportunity to comment on the proposed Neighbourhood Plan.</p> <p>First of all let me congratulate you in putting together such a comprehensive plan. Let me say first that my belief is that a Parish Council should reflect the views of its residents which in my view this does not.</p> <p>My main concerns are with regard to the proposed site allocations. The localism Act 2011 states- "Reform to ensure decisions about housing are taken locally".</p> <p>In fact this is not the case as we have a consultant who doesn't live in the village taking decisions who can't understand the</p>

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					<p>impact on people's lives, backed by a Parish Council who then abdicates responsibility to MSDC.</p> <p>Of course we have the argument that we have been allocated 55 houses but this is just a number so that MSDDC can meet the numbers handed them by the government. It no way reflects the needs of this village. But if we are to accept these numbers why did we not accept the development proposal at Jeffries Farm for 42 houses which would have less impact on the rest of the village. Although at the time the PC said the majority of the residents were not in favour, in fact if you care to look at the responses on the MSDC planning website you will find the majority were in favour. This together with 330 residents against the St Stephen's site. Another instance of the PC not listening!</p> <p>It's interesting to note that the Community response to in preparation for the 2009 NP was 71% whilst 56% in 2012. Maybe a reflection of a feeling that we are not being listened too.?</p> <p>In your document under the heading Protection of Landscape and Habitats which I find hard to justify. How can you condone these allocations when I alone who has a property which backs onto the proposed St Stephen's site most days have had pheasants, partridge, badgers even snakes in the pond together with a multitude of feeding birds. How can you justify taking away their environment meet with your stated aims? In addition, should this site go ahead there will be a need to take down mature trees to gain access. I also note there is no mention of Constance Woods which is owned by MSDC and which is used for recreational purposes and abuts St Stephen's fields. Future expansion to the West which was an objection as regards the Jeffries Farm site?</p> <p>Finally I would add that should these go ahead and in particular the St Stephen's site, it would see an increase of 100 cars in the village ,increased heavy lorries through the village along station road and we know the problems where station road meets bonfire lane on the corner. In addition, all the issues in Hamsland have been well documented.</p> <p>Unless the site allocations are changed I for one will vote against when the Referendum is held.</p>
029	001	Cllr Paul Brown	MSDC Counsellor		<p>HKNP Draft for Public Consultation. (Regulation 14). I wish to make the following comments.</p> <p>A net contribution to the Neighbourhood Plan housing land supply</p>

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					<p>position (HKNP para 9.7 Table A) of 11 dwellings is provided by, 'residential institutions arising from completions and commitments at Westall House'. In consequence the draft Neighbourhood Plan appears to be in conflict with its own policy HK17. The HKNP Site Appraisal on page 34 recognised that HKNP0028 (Westall House) location was, 'in an unsustainable location, with a difficult pedestrian link back to the village'.</p> <p>Is the provision of these dwellings, the construction of which is ongoing, contrary to Policy HK17 CYCLEWAYS AND FOOTWAYS if no footway is deemed necessary? This is a footway along one side of Birchrove Road between Danehill Lane and Westall House. Is this regarded as an exceptional justification, 'to maintain the existing character or appearance of a street or lane'? In my view the sustainability of the development, in terms of the well-being of residents, and the ability of employees to safely access the premises on foot from Horsted Keynes village and from public transport should override this caveat. By resolving this anomaly, an improvement in sustainability is achieved by avoiding multiple short, motorised journeys in taxi mode.</p> <p>I take the view that this final sentence of Policy HK17 undermines any weight that whole policy may carry with the Highway Authority. If this sentence remains, I request that a sentence is added to para. 8.10, 8.11 or 8.12 to include the objective of providing a footway along this short length of Birchgrove Road.</p>
030	001	Mrs H. Douch	St. Giles School Head		Thank you for sending the draft Neighbourhood plan to me, I was interested to read it.
031	001	B. Sawyers	Resident		I think the locations suggested are the best place if we are forced into additional houses in our lovely village.
032	001	Angela & John Browning	Resident		<p>We have perused the Neighbourhood Plan in some detail and are impressed with its contents and detail. It has been a difficult task to fulfil and we congratulate the Parish Council on eventually completing in such style.</p> <p>However, we would like to register that we consider that SA29, the land south of St Stephen`s Church, Hamsland, is not a suitable site for development because of the restricted access to and from the site.</p> <p>Although not resident in that locality, we do use Hamsland as an access to a country walk and have observed how narrow the road</p>

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					<p>is between The Lewes Road and St Stephen`s Church. There are also an extensive number of cars parked along its length. It already serves quite a large development.</p> <p>We recently witnessed a serious contretemps between two vehicles attempting to pass and can only envisage severe congestion during the construction phase, apart from mayhem in the future caused by 40-50 additional domestic vehicles once the development is completed. In addition, this will be the main access for all service and other home delivery vehicles that are prevalent in this modern age.</p> <p>We believe it is an unfortunate choice when others were more appropriate.</p>
033	001	Alan Davies	Resident		<p>Am I right in thinking that the PC supports the development of housing on the St Stephen's Field site?</p> <p>If so, I wish to strongly object. Access would be terrible, the impact on existing residents and parking, etc, would also be terrible. Hamsland is very narrow and has many cars parked on it, what is supposed to happen during construction and afterwards with all of these cars?</p> <p>I'm not sure how the PC can support something that around 300 residents have previously objected to.</p> <p>There must be other sites in Horsted Keynes that are better suited to development than this site. Why aren't these being proposed instead?</p> <p>Please include this in any feedback that you have to provide to the inspector.</p>
034	001	Jacqui Salt	Natural England		Natural England does not have any specific comments on this draft neighbourhood plan.
035	001	John Gallsworthy	Resident		I would put forward housing behind the catholic church in Hamsland providing the road is widened to create a parking lane, thus allowing two way traffic.
036	001	Lawrence (Loz) Allan	Resident		<p>I have now had a chance to review the Draft Neighbourhood Plan and would like to make the following comments:</p> <ol style="list-style-type: none"> 1. I wrote to the Parish Council with comment the day after the extraordinary meeting on in May 2019. The points here are much the same as my perception of the situation has not significantly changed.

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					<p>2. Firstly, I do understand the pressures and difficulties Councillors have experienced, particularly those tasked with producing the NP. My thanks to you all for your hard work over the years.</p> <p>3. In 2.15 the point is correctly made that car ownership and dependence is high in the Parish. Reference is made in the document to the negative impact of traffic within the village in terms of access generally, parking and safety (traffic density and speeds). All points are well made. Further, access roads connecting the village are not particularly wide, dangerous in places, and poorly maintained. It is likely that the volume of traffic transiting the village will increase irrespective of a greater number of houses proposed owing to the increasing use of on-line shopping and delivery vehicles. The extent to which the road through the village is used as a 'rat run' is hard to measure but it surely is a feature along with the size of vehicles (some of which fail to negotiate the bridge in Keysford Lane). Even with off-road parking provided at new sites, there will still be an increase of traffic in the village with journeys made from the new residences, along with additional delivery vehicles to these properties. As indicated in 10.2 of the document traffic calming is an issue. It is a cost item as has been revealed as a result of enquiries by the village Neighbourhood Watch group. I would be willing to assist the PC in looking into this further.</p> <p>4. There are several references to Horsted Keynes (HK) in the document as being a "small village". For example, 2.34 "...small rural Village", and 6.1 "...Horsted Keynes and its setting as a <u>small village</u> in a very attractive environment". Now I know this is semantics here, and it is a question of definition, but, as in 9.2, we are classified as a Cat 3 Medium Sized Village. I know the criteria used here is dependent on other factors but there is a contradiction in many senses. This is emphasised within the District Plan itself which by DP 12 recognises the need to protect the countryside yet determines simply by numbers the housing development this 'small' yet 'medium' village can tolerate. A SANG in East Grinstead would do little to ameliorate this.</p> <p>5. I note that development of Sites SA 28 and SA 29 will involve</p>

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					<p>extending the Built Up Area Boundary (BAUB) of the village. It is of note that NPPF section 13 refers to the protection of Green Belt land. A recent article in the Mid Sussex newspaper stated there are over 1007 acres of abandoned brownfield sites in Sussex, enough to build 23,000 new homes.</p> <p>6. I agree with those residents of Hamsland who object to development on St Stephen's Field. For reasons stated above it is not acceptable to impose a development on this site. Similarly, a more limited development on Police Field, which now incorporates two fields, would be more acceptable than the 25 dwellings proposed. I cannot support a large development on Jeffrey's Farm as an alternative, but a controlled, limited development where there are existing farm buildings would probably gain support from parishioners, even some who live close by.</p> <p>7. I consider that to accept the arithmetically derived number of new houses (69) dictated by the District Plan would be wrong, even at this late stage. We are merely custodians of this Parish not owners. Future generations would not forgive us for allowing the rural identity of this very unique village to be lost irretrievably. Thus, local factors should be taken into account and views of the local community which is the point of neighbourhood planning. I feel this number of 69 can be justifiably challenged taking into account the adverse effects significant development will have, we are after all, as stated in the Plan, in a "a rural location in the High Weald AONB" with all which that means.</p> <p>8. I agree with the statement in 6.23 of the Plan regarding Light Pollution. Though I am a tennis club member, I would not support flood lighting there, (or anywhere) which I know has been proposed.</p> <p>9. I would be pleasantly surprised to have the opportunity to discuss this further with any Councillor, either in person or on the phone. As it stands, I would not feel able to support this NP at a referendum; but I remain open-minded as we should all be at this stage.</p>
037	001	Margaret Jane Allen (MRS)	Resident		I believe Jeffreys Farm buildings are an ideal site for development as it has existing access, is not visible, and buildings are in a state of disrepair. It was allocated in the previous version of the plan, It

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					<p>appears to be now omitted from the new plan, no reason has been given why that should be so.</p> <p>Jeffreys Farm northern field site is not visible so is of little impact on the community or the AONB. It is the only site that has existing mature screening. It is ideally located at the western entrance to the village and would have no impact on traffic in the village, both in the short term building phase and the long term.</p> <p>St Stephens Field will have a huge impact on the existing traffic and parking issues along Hamsland. The cul-de-sac is already overcrowded with cars and the addition of 30 or more houses. This would have long term impacts on access either for traffic or pedestrians. It seems to have missed the point that many children access their homes along this road. If this site is granted access would be then available to develop Constance Wood and or the field adjacent to it.</p> <p>The council have not engaged with the community regarding changes to the plan, have not sought comment from the community since 2015 following a controversial Extraordinary council meeting. The council more recently have ignored comments and petitions opposing St Stephens Field allocation. Why is the question? Can they explain this? ignoring questions put by the villagers suggests devious plans may be afoot?</p> <p>I would have the parish council explain why they have ignored the villages views on this development. 'our' council do not appear to be acting in the interest of the village. This seems ironical since most of them live here.</p> <p>It begs the question, are the council being railroaded by Mid Sussex to allocate sites that will facilitate more building on the pony fields which I believe belong to Mid Sussex council. Rather than allow the people who live and work here to have a say.</p>
038	001	Malcolm & Sarah Amos	Resident		<p>We are writing in connection with the proposed development of St Stephen's Field which is close to our house.</p> <p>We object to the proposed development of the field because it would increase the traffic flow, both pedestrian and vehicular in the area and would negatively impact the environment, in particular threaten the many mature trees which screen the site. Please do not allow development of St Stephen's Field.</p>
039	001	David G Wilson	Resident		RYDON HOMES PLAN FOR ST STEPHEN'S FIELD

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					<p>DEVELOPMENT</p> <p>I am not directly affected by either the St Stephen's Field development nor by one at Jeffrey's Farm. However as a resident of nearly forty years I am familiar with both locations.</p> <p>From time to time I have reason to drive up Hamsland and, due to the cars parked on both sides of the road it is always difficult to get up and down there when vehicles are coming in the opposite direction. First of all you often cannot see them as the road is curved. Secondly when you do see them, there is often nowhere to pull in to let them pass. Vehicles, such as delivery vans, dustbin lorries, postmen, etc. have no option but to be stationary in the middle of the road, completely blocking it for a while. The idea of adding the traffic from another thirty homes is preposterous. It should be noted that, these days, many homes have more than one vehicle, so it could be up to sixty more vehicles attempting to drive up and down Hamsland.</p> <p>If there is an intention to develop the Constance Wood Field for housing, then that should be declared as part of any proposal to develop St Stephen's field, then the entire scheme can be considered a whole. In that case, access could be from Tremains Road, which would make more sense. It could also allow the whole development to be less densely packed.</p> <p>A development of thirty houses on Jeffrey's would be far more appropriate than the St Stephen's Field proposal. The houses could be less densely packed, and they would be screened from view, and also have a more pleasant aspect themselves. Access from Tremaines Road would be uncluttered with parked vehicles and so readily accessible for emergency vehicles, as well as the residents and other members of the public.</p> <p>I am disturbed to read that there are errors in various assessments. These should be corrected before any final decisions are taken.</p>
040	001	Justin Walters	Resident		I don't agree with the neighbourhood plan in its current form and feel far better sites for possible sites has been overlooked.
041	001	Kay Austin	Resident		<p>I wish to register my OBJECTION to Site SA29 - Land South of St. Stephen's Church, Hamsland, being included in the HKNP.</p> <p>The access to this site is totally inadequate, both for the site vehicles that will be required for the building process and for any</p>

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					<p>subsequent vehicular access required to the proposed houses. Even if the road was widened by removing the grass verges (a prospect I find unacceptable), the road would still not be wide enough to accommodate site vehicles and parked cars with the need to leave access to council trucks, delivery vans, oil tankers and emergency vehicles.</p> <p>As a resident of Bonfire Lane (upper), I am particularly concerned that none of the site maps in the plan show that Lower Bonfire Lane Is a cul-de-sac and gives NO access into Hamsland. This needs to be rectified in any plans put forward.</p> <p>Such a development, in my opinion, would bring untold misery to the residents of Hamsland in particular; and disruption to residents of Challoners and Lewes road during the construction phase.</p> <p>Regarding Site SA28 - Land south of the Old Police House, Birchgrove Road - I have no objection in principle to this development, but would like to make the following observations:</p> <ul style="list-style-type: none"> - the oak tree on the edge of the road by this site should be retained. This is a landmark in the village, and major trees such as this need conserving. - the entrance to this development would be within a few metres of a road junction to the North East and within 100 meters of a sharp 90 degree bend leading to The Green, with Bonfire Lane on the apex of this bend. Traffic calming measures should be a pre-requisite to this development for any traffic entering the village from the North East. In particular, the 30 mile limit sign would need to be positioned further out of the village and be made more visible.
042	001	Tim Westlake	Resident		<p>I wish to register my strong objection to any development of the policeman's field. This is a public footpath regularly used by walkers and dog walkers from the village and indeed further afield.</p> <p>I do not necessarily object to some further housing in the village, but this should be limited in number and size and be along roads. The old Catholic church is sensible but there are also other sites such as the road that runs opposite the Westhall club after the Danehill turning. Also, many years ago there used to be a barn at the turning to Danehill and a sympathetic barn type small development of one or two dwellings might be possible on the</p>

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					corner i.e. between the Old Police House and the turning to Danehill.
043	001	Terry & Sylvia Higham	Resident		<p>ORIGINALLY RECEIVED ON 1 DEC AT 13:38.</p> <p>INSTRUCTED BY EMAIL ON 2 DEC – AT 15:46 TO BE DISCARDED.</p> <p>REPLACEMENT INSERTED AS 043/002 LATER IN DOCUMENT.</p>
044	001	Charlotte Mayall	Southern Water		<p>Thank you for your email below, inviting Southern Water to comment on the pre-submission version of the Horsted Keynes Neighbourhood Plan.</p> <p>We are pleased to note that our previous comments have been carried forward into this version of the plan, and therefore have no further comments to make.</p> <p>We would however highlight an error in the table in Section 10 of the plan (page 56) where Southern Water is listed as the water supplier for the parish. Southern Water is the statutory wastewater undertaker for Horsted Keynes, whilst water is, we believe, supplied by South East Water.</p> <p>We look forward to being kept informed of the plan's progress.</p>
045	001	Michelle Knight	Resident		<p>I am writing with anger, to express my utter frustration and befuddlement as to why, after all this time and all the warnings and protestations, that the parish council has done NOTHING concerning the blind bend at Hamsland.</p> <p>This morning I returned and met another vehicle half way down. I did the kind thing and reversed out to Lewes Road, something which you will appreciate, takes a little time and care.</p> <p>When that car was passed I started down Hamsland again, to meet another car in the same spot. On top of that, another car came behind me, and another car came behind them.</p> <p>I almost blew a fuse.</p> <p>The car behind me, and I, once again backed out to Lewes Road and let the other two vehicles pass.</p> <p>When I finally got passed the blind bend, what did I see at the Apex of Challoners? An ambulance. If fate had been further against us, and that ambulance had needed to get out of here under blues and twos, then it would have been a real mess with someone's life potentially at risk.</p> <p>And the council wants to put MORE housing and traffic down here? When will the parish council finally condescend to do something about this? Has someone got to die first?</p>

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					I want to know what the council intends to do about this, and if the council intends to do nothing then please inform me so I can take this matter to MSDC.
046	001	Tony Skeel	Resident		<p>In addition to all the objectors against the Neighbourhood Plan, I should like to add mine. I totally agree that the existing plan should be scrapped, and redrafted to include and support the Jeffrey's Farm option, which is by far the most sensible option for all the reasons already put forward by so many!</p> <p>As it is supposed to be a Neighbourhood Plan, why have so many objections been totally ignored, currently the vast amount of parked vehicles both in Hamsland and right through the Green, make it virtually impossible for access to vehicles, to increase the numbers considerably is totally ridiculous.</p> <p>The current Plan must be redrafted!</p>
043	002	Terry & Sylvia Higham REPLACEMENT TO 043/001 REPRESENTATION.	Resident		<p>With apologies for the inconvenience, could you please discard the comments document I sent you yesterday and substitute the document attached below. Please confirm that this has been done.</p> <p>We have been advised by Andrew Marsh in MSDC Planning Dept. that comments you have been receiving during the current S.14 consultation are summarised by MSDC before being passed on to the Examiner, but comments made to MSDC during the S.16 consultation later on will be passed on to the Examiner in full. We intend to repeat all these objections to the NP draft's site allocations in the S.16 consultation if the PC decide to make no changes to their proposed allocations, and we are sure others who object will do the same.</p> <p>Please consider this email as part of our comments on the draft NP.</p> <p>COMMENTS ON DRAFT NEIGHBOURHOOD PLAN (NP)</p> <p>The comments below solely relate to the site allocations proposed in the draft NP as set out in the October 2020 edition of the P&P. They are submitted on behalf of myself and my wife.</p> <p>1 General</p> <p>We strongly object to the PC's agreement to give way to MSDC's Planning Dept. in the site allocation process despite the PC Chairman's repeated warnings at PC meetings over the years that if sufficient land was not forthcoming in our NP proposals to meet</p>

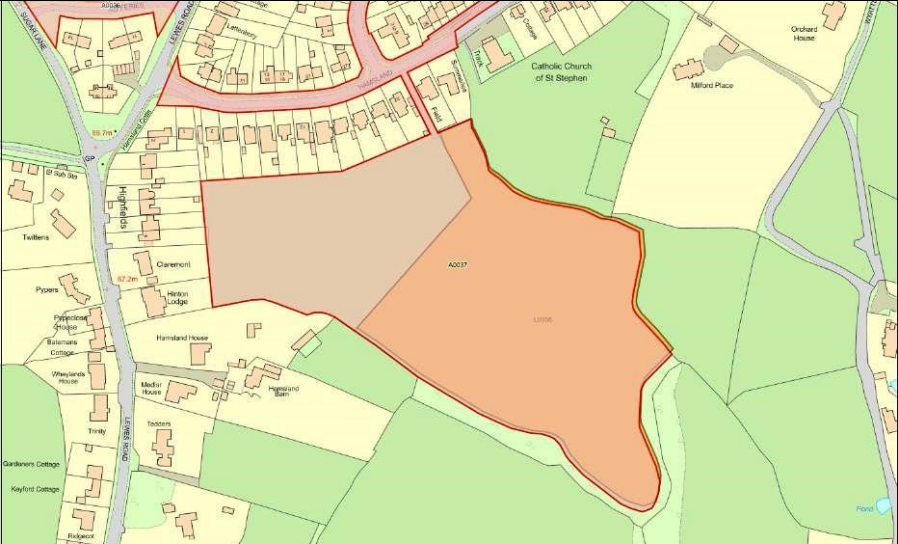
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					<p>MSDC minimum targets for new homes in HK then MSDC would take over the allocation process and despite the fact that the PC made this critical decision solely on the advice of their consultant and without consulting residents first. This adds to the evidence that in drafting the NP the PC has represented MSDC's planners rather than residents.</p> <p>I know for a fact as a former member of the NP steering group (SG) in 2014-15 that the alleged lack of available land has only been a problem because of the PC's resolve to exclude an unobtrusive green field site (in 2015 treated as 2 sites) on Jeffrey's Farm (JF) with a capacity for well over 30 new homes. Apart from supporters of the Sugar Lane lobby group, this site has always had widespread support in the community at large as confirmed by the consultation event held on 24 January 2015 attended by 300 residents and audits carried out separately by myself and a former chairman of the SG on 126 questionnaires completed by participants in the PC's workshop event in September 2015. These two audits showed around 50% support for the site and around 60% support for the field the landowners proposed for access to the site and for recreational use. This was despite the workshop booklet's wholly negative treatment of these sites which included reasons for categorising them as "no longer under consideration". To counter this, two former SG chairmen and I circulated a flyer shortly before the workshops began showing why the booklet's reasons for doing this were bogus.</p> <p>2 Police House Field (PHF)</p> <p>We do not object to this MSDC allocation as such. However, we do object to a different treatment of this site from MSDC's treatment of JF sites. This is because MSDC has objected to the development of JF to the west of Sugar Lane on the ground that it would breach a defensible boundary and could therefore lead to development spread to the west towards Lindfield, but MSDC did not register a similar objection regarding PHF although its allocation could equally lead to development spread to the south towards Dane Hill. If MSDC need a defensible boundary on the western edge of the village then they need a defensible boundary on the southern edge as well.</p> <p>3 St. Stephen's Field (SSF)</p> <p>We do object very strongly to the imposition of another 30 homes</p>

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					<p>accessed via Hamsland, a road already serving a cul-de-sac of about 120 homes, for the following reasons:</p> <ul style="list-style-type: none"> a) Hamsland is beset with on street parking problems that often reduce the whole road to a single lane, especially outside working hours. Although my enquiry to West Sussex Highways showed they took a relaxed attitude to this, a traffic consultant advised the Hamsland Action Group in 2015 that Hamsland was already a congested minor single-entry residential road that was unsuitable to accommodate a major two-year building project and 30 new homes. b) Although traffic in Hamsland is relatively light most of the time, multiple tyre-scarring of grass verges proves that vehicles have to use verges and driveway entrances on the south side of the first curving section of Hamsland to allow oncoming traffic to get by or delivery vehicles to park safely whilst making goods or service deliveries. It is therefore clear that construction traffic during a two-year building project on a site well into the second half of Hamsland would greatly exacerbate the existing problem for residents. c) Construction traffic, including heavy 8-wheeler trucks, would damage the tarmac surface, cause even more use of verges to permit traffic flow, require the removal of verges to widen the approach to the site according to MSDC, damage residents' health by noise and air pollution, and reduce road safety for residents including children and elderly people. d) Completion of the site would be followed by a period during which large furniture vans and other delivery vehicles would be needed for the sudden influx of new residents, and this would be followed by the normal traffic they generated which as a percentage increase would greatly exceed the 25% increase in households because of the disproportionately high incidence of elderly non-driving residents in the existing cul-de-sac. e) West Sussex Highways have advised me that they have not consulted with emergency services in relation to the allocation of SSF as this is a matter for MSDC, but given

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					<p>instances where the first section of Hamsland has been completely blocked by double-parked gas delivery vehicles with pipes connected to home gas tanks or by ambulances double-parked to attend emergency patients on the north side, the risk of delaying access to emergencies beyond the obstruction is self-evident and cannot responsibly be increased by adding more traffic. Despite MSDC's misleading street map, Bonfire Lane cannot provide alternative emergency access because it ends as a pedestrian path leading to a padlocked gate and is in any case too narrow in places to provide the minimum width prescribed for fire engines.</p> <p>f) In order to satisfy MSDC housing targets, the PC's inflexible and we believe conflicted opposition to the HK's least intrusive site on JF has forced it to promote HK's most intrusive and unpopular site, viz. SSF. But as PC members know perfectly well, MSDC also have a conflict of interest in relation to SSF because it would at last give them road access to the land they own to the west and south of SSF, including Constance Wood Field, i.e. the shaded bordered land south of Hamsland shown in MSDC's map below.</p>

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					 <p>In response to an enquiry, the PC's Chairman has forwarded this MSDC comment: <i>"The area Mid Sussex owns is shown in pink and in orange what is currently licensed out to the stables. Our site is a potential development site and until the work on the Neighbourhood Plan in Horsted Keynes has been completed we are not in a position to progress the sale of any land that could be the subject of that plan."</i> So MSDC envisage future development of their land which would massively increase the short and long-term disruption of developing SSF.</p> <p>g) Conveniently for MSDC, the layout of the plan to develop SSF would facilitate access to their land at the cost of felling some of the trees on its southwestern boundary, and MSDC have refused to allow tree preservation orders on any of the trees in this border. They have also failed to insist on a site layout which would stop development spread to the west and south as they strongly advised for the Jeffrey's chicken farm site to prevent western development spread. It is quite evident that MSDC's insistence on a "defensible boundary" to protect land to the west of JF sites is not only not being applied to PHF but is also not being applied to the SSF site, no doubt because to</p>

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					<p>do so would block highly profitable future development of its own land to the west and south of SSF. MSDC is applying double standards in circumstances where it has a clear conflict of interest. The PC is of course aware of this conflict of interest but has nevertheless accepted this deeply flawed SSF allocation instead of challenging it.</p> <p>h) The PC has declared local green space provision to be important but, in contrast to the JF site, the SSF plan has almost no such provision. Moreover, conveniently for the development potential of MSDC land, the PC's list of protected green spaces omits Constance Wood Field.</p> <p>i) Infrastructure (water supply, drainage, power, etc.) for the Hamsland cul-de-sac is already inadequate, and a 25% increase in homes on a south-sloping site will increase the problem.</p> <p>j) The High Weald AONB unit have assessed the SSF site as low impact but told me that MSDC had not advised them that the trees lining the access strip of land onto the site would either have to be felled or at the very least have their root plates bridged and a severe cut-back of their lower branches to enable high-sided or crane-bearing vehicles entry to the site. Nor have MSDC advised the unit that development of SSF would allow it to fell trees to access its own land via SSF. A NP planning officer told me in 2015 that MSDC would be ready to do so.</p> <p>We think that the inclusion of SSF not only ignores the many serious objections detailed above but is also a deliberate slap in the face to all those residents who signed the petition, thereby reducing the NP process to an undemocratic charade. Clearly, the PC would prefer to wage war on a quarter of the village's households in defiance of the petition rather than reject their consultant's advice and confront MSDC with what residents really want in accordance with the government's intention in passing the Localism Act and in their NP guidance notes.</p> <p>4 Jeffrey's Farm North Field (JFNF)</p> <p>In early 2015 the PC's consultant learnt of MSDC's concern that allocation of JF sites could lead to development spread to the west and proposed a simple solution. This was the gift of a strip of boundary land to, say, the PC's property holding trust so that the</p>

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					<p>landowners could not later extend the first development westward without the community's and MSDC consent. A suitably worded covenant could achieve the same protection. This would answer MSDC's concern by establishing a legally enforceable and therefore <i>more</i> defensible boundary than Sugar Lane which, taking account of the road's continuation as Treemans Road, has already been breached with multiple dwellings on its western side. I resurrected this idea in September 2015 but both MSDC and the PC ignored it.</p> <p>In late 2019, MSDC put forward just two grounds for excluding JFNF: (1) Access to the site was very restricted or impossible; (2) the AONB unit assessed the site as high impact. In order to serve their residents and reflect their views in the NP process, the PC should have challenged both objections.</p> <p>The site access objection is wholly invalid, as the proposed access would be from a point in Sugar Lane opposite Jeffries already approved by West Sussex Highways and cross over the corner of Jeffrey's front field to an existing gap in a hedge which would only need to be widened. I believe a serious misrepresentation by a PC facilitator at the 2015 workshops is responsible for this error as she alleged, in the presence (unknown to her) of the landowner's wife, that the landowners would not allow access to the north field via the front field, apparently confusing holders of a covenant that blocked house-building but not road building on the latter with its owners. This explains why in 2019 the owners had to prove that they owned the front field to satisfy MSDC that access was available. When they did so, MSDC's promised to remedy their error at the end of the S.18 consultation, but it was still present in MSDC's SHELAA document a year later during its S.19 consultation. It poses the question of why a supposedly impartial body was so reluctant to correct their error.</p> <p>In layman's eyes, the AONB unit's assessment is nonsensical because the High Weald AONB covers 146,000 hectares, and yet they allege that the development of one hectare on a virtually invisible site would have a "high impact". Their assessment is also self-contradictory. The only reason they gave in response to the landowners' challenge was that "<i>development would be out of character with the settlement pattern of Horsted Keynes</i>". In answer to the landowners' explanation of how the village had</p>

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					<p>developed in the 20th century, they said that their "assessment relates to the <u>historic</u> settlement pattern" and "20th century additions to the village are not relevant to this assessment. Nonetheless, the development on the east side of Sugar Lane is of a denser, more consolidated character compared to the dispersed development beyond Sugar Lane." This is self-contradictory as the denser development on the east side was all 20th century development and was therefore "not relevant" to their assessment. It also contradicts the approval in principle (i.e. subject to seeing a detailed development plan) which the unit gave to the PC's former consultant in 2016 prior to his recommendation to the PC to include the JF landowners' 42-home scheme in the NP. The PC again underlined their bias against JFNF by rejecting this advice in favour of including a policy to allow for unidentified small sites accommodating up to 10 homes to come forward, a policy that all too predictably has so far produced zero sites four years later. As the consultant foresaw, the resultant minimalist NP submitted in 2017 by the PC was rejected by the government Examiner in 2018.</p> <p>5 Conclusion</p> <p>The national planning guidance for neighbourhood plans states that the process is designed to give communities a decisive say in where new development goes, but the PC has acted throughout this process as if it is entitled to make key decisions on this with no prior consultation with residents, e.g. the rejection of their consultant's advice to include a JF scheme in late 2016 and handing the site allocation process over to MSDC in late 2019. The inclusion of SSF in 2015 provoked a petition by 141 residents in opposition, but despite this and strong opposition at its meeting on 23 May 2019, the PC accepted their consultant's inclusion of SSF. This provoked another petition against including SSF in July 2019 signed by 330 residents, 176 of them residents outside the Hamsland cul-de-sac.</p> <p>The PC's failure to investigate the facts and support the JF landowners' valid proposals has directly led to the present impasse and the virtual certainty that any NP which includes SSF and excludes JFNF will be rejected at referendum. It is a fact that in my presence on the 8 June 2015 the current PC Chairman, then chairman of the SG, signed off a draft NP which contained a</p>

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					<p>combined allocation of JF sites including the chicken farm with a capacity of up to 55 new homes. However, he later advocated a second land call to allow SSF to be submitted and thereby open the way for Constance Wood Field to be included as well with access via SSF. These allocations were enough to replace the JFNF capacity which the new SG decided in July/August 2015 to exclude.</p> <p>I and the previous chairman of the SG, both non-PC members of a new SG after May 2015, thought a second land call unnecessary and that, subject to further consultation with residents on the draft NP, we could have met MSDC's JF concerns and gone to referendum in 2016. But reconstitution of the group as a PC committee in May 2015 meant that we had no voting rights and little influence. In July 2015, the PC decided to exclude non-PC members altogether, reducing the SG to 4 PC members two of whom had known conflicts of interest regarding JF development. These two were then asked to draft the workshop booklet described in section 1. So here we are five years of wasted effort and expense later presented with a draft NP the PC knows has little chance of passing at referendum.</p> <p>As construction traffic would use Sugar Lane to access SSF as well as the JFNF site, the latter has <i>none</i> of the disadvantages of SSF and is the least disruptive and visible site available. Its less invasive position is seen as an advantage by normal people who would not choose to have new homes built next to fellow residents' back gardens. Both the PC and MSDC have had conflicts of interest which, along with many others, we believe have influenced decisions made over the past five years and undermined the impartiality of the process. If the PC's plan stays as it is, we trust that the Examiner will take all these conflicts of interest, planning flaws and consultation failures into consideration.</p>
047	001	Carole MacNaughton	Resident		<p>Building new housing in a part of the village already suffering from excess traffic will affect the quality of life for the hundreds of residents living there.</p> <p>With only ONE access road into Hamsland, Challoners and Home Farm Court there is already congestion. Just one side of the access road has off-road parking so there is a constant line of parked vehicles on the opposite side. This reduces the width into</p>

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					<p>a single lane, making vision difficult for drivers leaving and entering the estate and causing blockages.</p> <p>With the works lorries and vehicles needed to build the St. Stephen's site and (afterwards with completion of the buildings) extra cars of the new residents, surely gridlock will ensue.</p> <p>In such a densely populated estate there is inevitably a good proportion of elderly residents. How will emergency vehicles gain access to them in times of need?</p>
048	001	Hannah Brothwell	Environment Agency		<p>Thank you for consulting the Environment Agency on your Draft Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.</p> <p>Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:</p> <p>http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p> <p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p><u>Flood Zone</u></p> <p>We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.</p> <p><u>Water Quality</u></p> <p>We recommend development is phased to ensure the appropriate infrastructure is in place to support growth. We advise you speak with Southern Water to understand any constraints in your local area.</p>

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					We have worked with and supported your Local Planning Authority as they develop their Community Infrastructure Levy. We would welcome the opportunity to work with you to ensure environmental infrastructure is taken into consideration when funding local infrastructure.
049	001	Ian Mayhew	Resident		<ul style="list-style-type: none"> I have reviewed the proposed plan and wish to object strongly to the inclusion of the St. Stephen's field site, for all of the reasons already stated by myself and many others in previous iterations of this planning process. In summary, the objections relate to the following: The decision to include this site completely ignores the strong petition of objection signed by 330 residents in 2019, thereby contradicting the Parish Council's statement that there has been 'extensive consultation with the local community'. It would appear that the latest decisions have instead been driven solely by their consultants and the MSDC, including allowing them to allocate sites without reference to those directly impacted. The selection of a site (St. Stephen's field) which is clearly more disruptive to local traffic in a road which is already single lane and is frequently blocked, risking serious safety issues for the passage of emergency services. There are numerous other sites under consideration (Jeffrey's farm for example) which are far more accessible, and which better support the Parish Council's objective of 'reducing the negative impacts of traffic'. The proposed development plan for St. Stephen's field shows a densely packed site with little or no green space, whereas the plan could be accommodated into the Jeffrey's site with plenty of green space and would fulfil another of the Parish Council's objectives to 'conserve and enhance the environment of the village'. The St. Stephen's development plan abuts existing homes whereas alternatives such as Jeffrey's farm do not and are therefore more consistent with another of the Parish Council's objectives to 'minimise the adverse environmental effects of

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					<p>new development’.</p> <p>The above is a very brief summary of the principal objections to inclusion of St. Stephen’s field into the allocations list. I would ask that the matter is reconsidered by the Parish Council and the plan adjusted to remove the St. Stephen’s site before submission to MSDC.</p>
050	001	Joyce Mayhew	Resident		<p>I have reviewed the proposed plan and wish to object strongly to the inclusion of the St. Stephen’s field site, for all of the reasons already stated by myself and many others in previous iterations of this planning process.</p> <p>In summary, the objections relate to the following:</p> <ul style="list-style-type: none"> ▪ The decision to include this site completely ignores the strong petition of objection signed by 330 residents in 2019, thereby contradicting the Parish Council’s statement that there has been ‘extensive consultation with the local community’. It would appear that the latest decisions have instead been driven solely by their consultants and the MSDC, including allowing them to allocate sites without reference to those directly impacted. ▪ The selection of a site (St. Stephen’s field) which is clearly more disruptive to local traffic in a road which is already single lane and is frequently blocked, risking serious safety issues for the passage of emergency services. There are numerous other sites under consideration (Jeffrey’s farm for example) which are far more accessible, and which better support the Parish Council’s objective of ‘reducing the negative impacts of traffic’. ▪ The proposed development plan for St. Stephen’s field shows a densely packed site with little or no green space, whereas the plan could be accommodated into the Jeffrey’s site with plenty of green space and would fulfil another of the Parish Council’s objectives to ‘conserve and enhance the environment of the village’. ▪ The St. Stephen’s development plan abuts existing homes whereas alternatives such as Jeffrey’s farm do not and are therefore more consistent with another of the Parish Council’s objectives to ‘minimise the adverse environmental effects of new development’.

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					The above is a very brief summary of the principal objections to inclusion of St. Stephen's field into the allocations list. I would ask that the matter is reconsidered by the Parish Council and the plan adjusted to remove the St. Stephen's site before submission to MSDC.
051	001	Christopher Hough	Sigma Planning	Rydon Homes	<p>We act on behalf of Rydon Homes Ltd and are instructed by them to respond to this consultation on their behalf.</p> <p>Rydon Homes Ltd is a well-established firm of house-builders, which has been building high quality housing, mainly in the Kent/ Surrey and Sussex areas for 40 years. Its main office is in Forest Row, East Sussex. Rydon Homes is part of the Rydon Group, which comprises a range of property-based companies. Further details are available on its website, www.rydon.co.uk. In addition to constructing housing for the private market, the Group also has particular expertise through both its Homes and Construction companies in the provision of affordable housing.</p> <p>Horsted Keynes and surrounding areas have been a location of interest to Rydon over the years and they are currently promoting land south of St Stephen's Church, Hamsland for housing development. This site is proposed as a housing allocation for 30 dwellings in the Mid Sussex Draft Site Allocations DPD (Policy SA29).</p> <p>The housing strategy of the Neighbourhood Plan (Paragraph 9.6) is to rely on the MSDC Site Allocations SA28 and SA29 to meet its' residual housing requirement. This strategy is supported by Rydon, who confirm that the SA29 site is suitable, deliverable and achievable for a high quality housing development of 30 dwellings. They can also confirm, from the outcome of the range of professional consultant reports that they have had carried out, that the site is unconstrained and housing can be delivered promptly.</p> <p>There are a number of amendments to the Neighbourhood Plan that Rydon consider would be improvements and make it more consistent with National Policy, Local Plan policies, the evidence base and the views of local residents expressed through consultation on earlier versions of the Neighbourhood Plan.</p> <p>Policy HK3 : Dwelling Mix. This policy does not prescribe any specific policy mix, leaving the detail of each proposal to be finalised through pre-application discussions and the planning</p>

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					<p>application process. This flexibility is welcomed and should be retained in the final version of the policy. However, there is an indicative housing mix set out in the draft policy of:...</p> <p>40% 1 bed/ 2 person 40% 2 bed/4 person 20% 3 bed/5 person</p> <p>Whilst the use of the word "approximately" in the draft policy allows for some flexibility, Rydon consider that the indicative mix needs to be broader and more representative of the range of supporting evidence available on this matter. Rydon suggest that the indicative mix should be as set out in the 2017 Submission Consultation Reg. 16 Neighbourhood Plan, which was:-</p> <p>10% (at least) 1 bed 40% (at least) 2 bed 30% (at least) 3 bed 10% (no greater) 4 bed</p> <p>This is a mix that is better balanced, more representative of local views and need and better reflects the requirements of the housing market as well as social housing. The reasons why Rydon take this view are:-</p> <p>Accommodation Space. The assumption that a 1 bed unit meets the needs of single person households and couples is misplaced. A second bedroom is required by people working from home, as occasional guest accommodation, when starting a family or simply for storage. 1 bed units are also not favoured by many people trading down from larger properties where the contrast in available space is too great to be acceptable. Whilst 1 bed units represent a minimum standard for small dwellings, their inflexibility and unsuitability to meet the needs of many small households means that 2 bedroom units should be provided where possible. Therefore the target for the provision of 2 bed units should be greater than for 1 bed units.</p> <p>Local Opinion. In the workshops held in 2015 there was much discussion about the proposed policies which, at that time, required 20% 1 bed and 30% 2 bed units. The prevailing view, from 126 questionnaire responses, emerged that the balance should be changed in favour of more 2 bed dwellings and less 1 bed.</p>

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					<p>Family Housing. It is the case that Horsted Keynes has a comparatively high proportion of 4 and 5 bed properties compared to the District, By contrast, the proportion of 3 and particularly 2 bed properties is much lower and there is a potential mismatch between the supply of properties (which are large) and the needs of households (which are for cheaper, smaller properties). This situation (identified at Paragraph 2.16 of the text of the Draft NP) does not refer to 1 bed properties as playing an important role in addressing this mismatch*</p> <p>The NP Objectives, set out at Paragraph 3.3 of the text, include "addressing the needs of younger people and families to help maintain the village age profile". Family housing should have at least three bedrooms and for most families with two or more children, a four bedroom house is most comfortable. Most of the existing stock are larger 4 bedroom properties but there is a need for more smaller, modern houses to provide greater choice and opportunity for families. A small proportion of new 4 bedroom dwellings would provide a useful addition to the range of type of new dwelling to be provided for families and to allow trading down in less dramatic fashion for older people.</p> <p>Housing Need. The Northern West Sussex Mid Sussex SHMA update (2012) supports the provision of a broad mix of housing to deliver mixed communities. It states that demand for family housing remains strong across all the Districts within the Housing Market Area. This, rather than flats and apartments, it concludes, is likely to remain the mainstay of housing delivery in the HMA. The requirement in rural areas is for both new market and affordable housing including larger and higher value homes, off-set by the provision of suitable affordable housing, particularly family housing, which can broaden the social and age mix of rural communities (Paragraphs 5.27 and 5.28).</p> <p>The 2014 SHMA update focusses on Affordable Housing and concludes that there is a need to ensure that a range of sizes of affordable housing is provided including larger family accommodation as well as small accommodation. The proposed mix is:-</p> <ul style="list-style-type: none"> 1 bed 25% 2 bed 50% 3 bed 20%

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					<p>4 bed 5%</p> <p>This housing mix is for affordable housing, Different considerations apply in relation to market housing.</p> <p>The Horsted Keynes Housing Needs Survey 2019 was a localised and very focussed study relating solely to affordable housing need at the specific time of the study. A total of 645 forms were sent out, 167 were returned a 26% response. It attracted a very defined response, dominated by single adults, most of whom were living with their parents and seeking to set up their own independent home. Of the 24 households identified as being "in need" of and eligible for, affordable housing only 5 indicated that they were currently on a Local Authority or Housing Association register or waiting list whilst the significant majority, 18, were not and one did not complete the question. This response is not statistically robust and needs further interrogation before it can be relied upon. On the facts it demonstrates an opportunistic and aspirational need rather than a practical or compelling requirement. This may explain the local difference with the wider situation across the District and Local Authority and Housing Association Registers. Although it is useful research it would be wrong to place too much reliance on this study without careful analysis, balance and interrogation of the results.</p> <p>Planning Policy. Policy DP30 of the Mid Sussex District plan requires a mix of dwelling types and sizes in new residential development that reflects current and future local housing needs.</p> <p>Conclusions on Housing Mix.</p> <ul style="list-style-type: none"> ▪ Established policy and the SHMA assessment seek a balanced housing mix with the emphasis on smaller dwellings and housing for families. 1- bed properties do not feature widely in the assessment of need. ▪ 1 bed properties are restricted in their ability to provide for the wider requirements of all single person households, couples or households that are trading down. ▪ the previous version of the Neighbourhood Plan included a broader mix of housing with the emphasis upon 2 and 3 bed properties but also some 1 bed and 4 bed. In the absence of subsequent early engagement/consultation presenting different results the local opinion response remains that there

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					<p>should be more 2 bed and fewer 1 bed properties.</p> <ul style="list-style-type: none"> the current indicative mix proposed in draft Policy HK3 is strongly biased towards 1 and 2 bedroom dwellings and this is out of step with other evidence from the SHMA, the previous plan, local opinion and planning policy that requires a balanced mix of housing to broaden the social and age mix of rural communities. It also fails to support the NP objective of addressing the needs of families. The proposed indicative mix appears to be derived from the results of the Horsted Keynes Housing Needs Survey 2019 but this represents only a 26% response rate and the outcome was skewed by the very large response rate from single adults living at home seeking to create separate households but not currently registered with the Local Housing Authority or any Housing Association. This is an aspirational need rather than a real and compelling one. It should not be disregarded but equally it should not be so influential on development plan policy to put it out of step with other parts of the evidence base and local plan policy all of which seek a more balanced approach that also addresses the need for family housing and focusses on main provision of 2 and 3 bedroom dwellings. market housing requires a greater emphasis upon 2, 3 and 4 bed properties to provide a broad mix because there is less demand for 1 bed properties. the indicative mix set out in draft policy HK3 should be broadened with less emphasis on 1 bed properties, - the indicative mix set out in draft policy HK3 should be broadened with less emphasis on 1 bed properties, The proposed mix from the previous version of the NP is suitable and preferable:- <ul style="list-style-type: none"> 1 bed - 10% (at least) 2 bed - 40% (at least) 3 bed - 30% (at least) 4 bed — 10% (no greater than) <p>This is a mix that would be more representative of the wider evidence base and other considerations viewed as a whole.</p>

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					<p>Policy HK12. Whilst it is a reasonable objective to seek to secure sustainable drainage systems it is not always practicable, particularly given the local, clay dominated geology. A slight change of wording is therefore suggested. The word "must" can be replaced with the word "should" and the words "where practicable" can be added. This would be consistent with the wording of the preceding Policy HKII and would provide flexibility without weakening the effectiveness or objectives of the Policy. Excessive rigidity will weaken the policy because it will have to be over-ridden in cases where SuDS systems are impracticable. The suggested amended policy would read:-</p> <p style="padding-left: 40px;">"Development proposals creating significant new drainage requirements should demonstrate that effective Sustainable Drainage Systems are incorporated, where practicable, and a long term management plan should be prepared....."</p> <p>Site Allocations. The proposed site allocations are supported. In Paragraph 9.2 the 69 dwellings should be prefaced by the wording "at least" or "minimum" to ensure that it is not regarded as a cap and to properly reflect its derivation from the District Local Plan. This would also be consistent with the wording of Paragraphs 9.7 and 9.8 which accurately describe the number as being a minimum figure.</p>
052	001	Sue Stewart	Resident		<p>I have read the Plan with interest. However, I cannot support for development behind the Catholic Church. Hamsland is already congested with parked cars on both sides of the road making it exceptionally difficult for larger cars to get through. Any emergency vehicles would not get through. The grass verges are already being used for cars to pass. Many houses do not a provision for off road parking (or don't use it) and if additional traffic, from the development, uses Hamsland or Challoners, there is no other way out, there will be complete standstill of traffic. Perhaps that land should be used for garages, to fit modern cars and yellow lines put along one side of Hamsland. Cars being parked on the grass verges really spoil a very pretty village. I thought the Village shop had already been registered as a village asset along with both Public Houses.</p>
053	001	David Watson	Resident		<p>Firstly, congratulations and thanks to the Parish Council for</p>

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					<p>providing such a comprehensive plan.</p> <p>I have a few of minor points:</p> <ol style="list-style-type: none"> 1. Page 18. I do not know where "Burn Lane" is and I wonder if this is a typo. 2. Page 21. 3.3. 4. Should there be more emphasis on Home Working post Covid? 3. Page 55/56. I wonder if the Post Office which is managed by a local committee should be included as a Community Action.
054	001	Antonia Catlow	Strutt & Parker	Sunley Estates Ltd	<p>Comments in relation to: Policies HK1, HK3 and HK17</p> <p>Land South of The Old Police House – MSDC SADPD Site Allocation SA28</p> <p>Strutt & Parker's Planning Department are instructed by Sunley Estates Ltd to respond to the Horsted Keynes Neighbourhood Plan 2016 – 2031 Regulation 14 Consultation. Sunley has recently been appointed by the landowner as the developer and has a legal interest in land at The Old Police House which it is promoting for new housing.</p> <p>Paragraph 37 of the revised National Planning Policy Framework (NPPF) (2019) states that Neighbourhood Plans must meet certain 'basic conditions' and requirements as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). In particular, the Plan should be in general conformity with the Development Plan and have regard to national policies and advice contained in guidance issued by the Secretary of State.</p> <p>This supporting statement provides further information regarding Site SA28 at land at The Old Police House and seeks to support its formal allocation both within the MSDC emerging Site Allocations Development Plan Document and through the Horsted Keynes Neighbourhood Plan. It also offers direct commentary on a small number of the proposed Neighbourhood Plan policies.</p> <p>Category 3 Settlements in Mid Sussex District</p> <p>Horsted Keynes is designated as a Category 3 settlement under policy DP6 of the Mid Sussex District Plan 2018. The District Plan describes Category 3 settlements as 'medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities'. Horsted Keynes was identified in the District Plan as being required to provide at least</p>

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					<p>69 dwellings in Mid Sussex over the period to 2031.</p> <p>Overall, the current draft of the Mid Sussex Site Allocations DPD under-delivers housing numbers in Category 3 settlements when assessed against the District Plan targets with a total shortfall of 133 dwellings. Category 3 settlements remain the most underrepresented in the proposed Site Allocations DPD despite being recognised as sustainable settlements. It is therefore imperative that any current proposed allocations in Category 3 settlements, such as those in Horsted Keynes, continue to be supported for allocation and the proposed number of units on these allocated sites be accurately assessed to ensure the most efficient use of the land.</p> <p>The draft Neighbourhood Plan identifies that on the 31st December 2019 there were 18 completions and commitments in Horsted Keynes and therefore the housing land supply position now requires a minimum residual requirement of 51 dwellings to be delivered through allocations and windfall housing in the Parish.</p> <p>The Mid Sussex Site Allocations DPD have identified Sites SA28 and SA29 as the two most sustainable sites for allocated housing development in Horsted Keynes and between them, the two sites provide 55 dwellings, therefore meeting the proposed housing requirement. There have been no additional sites identified within Horsted Keynes which could be allocated without significant harm to the character and appearance of the High Weald Area of Outstanding Natural Beauty (AONB).</p> <p>In March 2020 both Site SA28 and SA29 were confirmed as not being Major Development in the AONB. It is important that Horsted Keynes meets its minimum residual requirement. The settlement is considered by Mid Sussex as sustainable and the draft Neighbourhood Plan indicates that St Giles Church of England (Aided) Primary School has capacity for further students and the Horsted Keynes general store, whilst well stocked and well-used by the current residents and nearby smaller settlements, requires continued local support to help the village continue to thrive. The key objectives set out by Horsted Keynes are to accommodate growth and meet the housing needs of younger people and families to help maintain the village age profile, whilst preserving the role as a rural settlement.</p>

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					<p>Background to Site Allocation SA28 – Land South of The Old Police House</p> <p>The number of dwellings identified for Site SA28, Land South of The Old Police House, during stage 2 of the SHELAA in April 2019 was originally assessed as 30, although it is currently indicated for circa 25 units. An indicative layout was submitted to Mid Sussex District Council in June 2020. This indicates how the site could accommodate 30 units, compliant with the Council's recommended housing mix policy and using evidence published in the Horsted Keynes Housing Needs Survey.</p> <p>The illustrative plans have a landscape led design including a positive active frontage, tree and hedge boundaries and a new access as required onto the Birchgrove Road. The scheme seeks to ensure the delivery of high quality and mix of housing that respects the character of Horsted Keynes whilst offering an appropriate transition to the wider High Weald AONB. The illustrative plan is continuously being developed and ongoing detailed and technical work is being undertaken to inform further iterations.</p> <p>A Landscape Character and Visual Appraisal report was prepared in October 2017 and updated with a full Landscape and Visual Impact Assessment in March 2020. Both concluded that whilst the character and appearance of the land would change from pasture land, there is the potential to set a new development within a robust green framework, allowing for development to be integrated into the existing village, without resulting in unacceptable adverse effects or causing any substantial landscape impact beyond the site's boundaries.</p> <p>Commentary on Horsted Keynes Neighbourhood Plan Policies</p> <p><u>Policy HK1: Location of New Development</u></p> <p>Policy HK1 requires development to be focused within the Built-Up Area Boundary (BUAB) of Horsted Keynes village unless they fall within certain criteria. The first criterion exempts the proposed allocations in the MSDC Site Allocations DPD, namely, Site SA28 at Old Police House and Site SA29 at St Stephen's Church.</p> <p>We therefore support both the purpose and wording of Policy HK1 to help deliver Site SA28 in accordance with the ambitions of the Parish and District Council.</p>

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					<p><u>Policy HK3: Dwelling Mix</u></p> <p>We support the ethos of Policy HK3 which aims to follow that of Policy DP31 of the Mid Sussex District Plan 2018. It is possible for a recommended affordable housing and tenure split to be proposed through the Horsted Keynes Neighbourhood Plan, but only where it is evidenced appropriately. The Policy should ensure that it meets the basic conditions required by a Neighbourhood Plan as set out by Paragraph 37 of the revised National Planning Policy Framework (NPPF) (2019). Any housing development in Horsted Keynes, including allocations in MSDC's Site Allocations Plan - on land to the south of The Old Police House and south of St Stephens Church, would be subject to these Policy requirements. It is therefore imperative that this Policy does not inadvertently become a barrier to development and that the Policy is sufficiently evidenced and justified.</p> <p>The Neighbourhood Plan indicates that there is a high proportion of detached 4 bed and 5 bed houses which contrasts with the needs of households, and that, in addition to a need for smaller, particularly one-bed, properties for rent, there is a need for a greater number of smaller dwellings at an affordable price for first-time buyers, young and growing families and older residents wishing to downsize in Horsted Keynes. This is said to be supported through evidence from: The Strategic Housing Market Assessment (2009 and updates), MSDC Affordable Housing SPD (2018), the Horsted Keynes Local Housing Needs Survey (2019) and the Common Housing Register (January 2020).</p> <p>The Neighbourhood Plan indicates that the Housing Needs Survey carried out in spring 2019 and published in October 2019 identified 24 households in housing need. Subsequently, in Jan 2020 it is indicated that there were 15 people on the housing register, of those 11 required a 1-bed, 3 were in need of a 2-bed and only 1 in need of a 3-bed.</p> <p>Policy HK3 therefore reads that:</p> <p>"Residential developments of over five dwellings should provide a mix of dwelling sizes (market and affordable) that reflect the most up-to-date local housing need evidence. The exact tenure, type and size split on each site can be advised through pre-application discussions, but it is likely to be approximately:</p> <ul style="list-style-type: none"> ▪ 40%- 1 bed/2 person

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					<ul style="list-style-type: none"> 40%- 2 bed/4 person 20%- 3 bed/5 person" <p>Our concern is that this Policy is directed to fulfil the needs of those on the housing needs register and does not reflect or provide any evidence of demand on the open market. There is no evidence in referenced documents of an oversupply of 4 or 5-bed open market properties, or details on how these properties have been defined. Nor is there any reference to potential future demand, such as allowing for growing families living in the Parish to find appropriate accommodation which would allow them stay in the area if their current property is too small. The Policy should have more flexibility and conformity with Policy DP30 of the District Plan which recognises and allows for changes in population trends over the lifetime of the plan in order to help create balanced communities.</p> <p>We recognise and agree that the proposed tenure split in Policy HK3 might be appropriate in relation to affordable housing, however, due to the lack of evidence, it would not be appropriate to require the tenure split through Policy for the entirety of a development, including the open market housing. Our recommendation is that the wording of the Policy recognises a more flexible approach and the defined split is either removed from the Policy and included in the pre-text only, or it is specified that the tenure split recommendation is in relation to the affordable housing proportion only (as evidenced).</p> <p>At present, we do not believe that Policy HK3 would meet the 'basic conditions' required of a Neighbourhood Plan.</p> <p><u>Policy HK17: Cycleways and Footways</u></p> <p>We support the ethos in the Neighbourhood Plan to reduce roadside parking in the village and encourage safe walking and cycling, and, that sufficient parking should be provided within new sites themselves, in line with WSCC standards, in order to avoid exacerbating the existing parking problems. We note this has not been directly included in the Neighbourhood Plan Policies, however, is covered by the Development Plan elsewhere.</p> <p>Policy HK17 requires suitable width footways and cycle links where possible and provide footways to the new dwellings. Whilst the principle of this is supported, the proposed allocated sites in Horsted Keynes are both likely to be formed in cul-de-sac type</p>

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					<p>designs in which it may be appropriate to incorporate alternative layouts such as using shared surfaces. The DfT Manual for Streets (2007) and The Mid Sussex Design Guide SPD (2019) gives guidance on the advantages of shared surfaces for traffic calming measures and creating pedestrian-friendly environments.</p> <p>In addition, in specific relation to Site SA28 at Old Police House, a large focus has been given on achieving a landscape-led design. The production of a Landscape Visual Impact Assessment seeks to ensure that the development integrates well into its surroundings. It is therefore important that this Policy allows flexibility in the design of any cycleways and footways to fit appropriately with the site's characteristics.</p> <p>We would therefore suggest a slight adjustment to the wording of this Policy to remove 'serving the new dwellings' from the following sentence: <i>'New developments shall provide footways serving the new dwellings that are of sufficient.....'</i> . This would allow for flexibility when preparing an appropriate design and clarity that a footpath does not need to serve each individual dwelling where there is an alternative preferred layout recommended by WSCC.</p> <p>Summary</p> <p>Sunley is a well-established house builder with an excellent track record of housing delivery, and are presently building homes in Mid-Sussex for local families. They are in contact with the Horsted Keynes Community Land Trust and are committed to exploring all options to ensure that the correct provision and mix of affordable housing can be both provided, and delivered on site within the next 1-5 years. A significant library of supporting technical studies for the site have already begun to take place.</p> <p>It is evident from the figures published in the Mid Sussex Regulation 19 SADPD that there remains a significant shortfall of provision of homes in sustainable Category 3 settlements, such as Horsted Keynes, across the District. Site SA28, Land at Old Police House, could offer a well-integrated scheme of suitable growth for Horsted Keynes which supports the village's current and future needs fulfilling their key objective; <i>'to accommodate growth and meet the housing needs of younger people and families to help maintain the village age profile, whilst preserving the role as a rural settlement'</i>.</p>

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					<p>Subject to our Policy recommendations above, including a review of Policy HK3 to ensure conformity with the Development Plan and National Policies as per the requirements set out under Paragraph 37 of the NPPF (2019), we would support the Horsted Keynes Neighbourhood Plan which would meet the 'basic conditions' required of a Neighbourhood Plan.</p> <p>We trust that this representation is useful and will be considered during preparation of the plan. Please do not hesitate to get in contact if you require any further information.</p>
055	001	T. Bartrum	Resident		<p>Looking at the various documents that are available and reading between the lines it very much looks like that the new development of St Stephen's field is a "done deal".</p> <p>I live in Challoners and I am very concerned that unless some major roadworks are carried out there will be chaos and severe disruption to residents of Hamsland and Challoners.</p> <p>During my working life I have worked on many building sites. Some are better managed than others.</p> <p>Firstly there will be several 8 wheeler lorries a day taking muck away whilst the foundations and roadways are constructed. As most lorry drivers are paid by the load moved they usually arrive at the site gates very early in the morning, from then on their movements will be constant all day. If there is no access to the site then the lorries will park, several at a time, along Hamsland and possibly into Challoners.</p> <p>Also, not all the drivers will observe the speed limits, both through the high street or along Hamsland. 30mph along Hamsland is too fast at the best of times. This needs to be reduced to 20mph and monitored.</p> <p>Residents vehicles will be at risk from damage and or being covered in mud or dust.</p> <p>HGVs, some artics, will be delivering construction materials causing the same issues with parking whilst waiting to enter the site.</p> <p>Construction workers will need to park, unless provision is made for on-site parking then these vehicles will park along Hamsland and Challoners. There is little or no free space at each end of the day as it is without any additional vehicles.</p> <p>If this development goes ahead then there could be problems with</p>

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					<p>the new residents trying to park additional vehicles in Hamsland and Challoners as new developments are never constructed with with an abundance of parking spaces. Looking at the plan of the new development this is certainly the case here.</p> <p>Everything about building a new development in Hamsland is wrong, building it in Jeffery's Farm is the logical and more practical thing to do.</p>
056	001	Judith Bowron	Resident		<p>I am very sorry to have left it so late to comment on the Neighbourhood Plan, but I hope that my feedback can still be used.</p> <p>I support the Plan overall and I think that the Vision and Objectives reflect the Horsted Keynes in which I am privileged to live. I also think that the 17 Planning Policies are excellent, and I am particularly in favour of those dealing with the environment and green space, things about which I feel very strongly.</p> <p>As far as the site allocations are concerned, I agree that developments on sites SA28, Land south of the old Police House, and SA29, Land south of St Stephen's Church, make sense and are sustainable. Most people seem to be in favour of the SA28 development, but I know that there is some opposition to the SA29 development. I think that residents of Hamsland should have been aware for many years that development to the south of it was likely and this has been reflected in the house prices there for some time. I remember going to an exhibition of the proposed Mid Sussex Development Plan soon after I moved to the village in late 2000 and it included a substantial development in Constance Wood Field. I know that the new development would be further east, but that site too has always been a potential housing area. When I attended a presentation about the revised NP, in 2019 I think, the consultant giving the presentation suggested that part of SA29 could be devoted to parking for some Hamsland residents and this seemed an excellent idea. I hope that it is included in the current proposed site plan.</p> <p>I admit that I was surprised to find that site 68, the old farm buildings at Jeffrey's Farm, is no longer in the NP. This seemed to be a very sound development that would improve the area concerned and not have any adverse effects. It is a shame that the access has been deemed not safe and I would have thought that this could be remedied fairly easily.</p>

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					With this minor proviso, I support the Neighbourhood Plan and hope that it can be progressed within a reasonable timescale.
057	001	Peter Whatling	Resident		<p>0 Foreward</p> <p>0.1 In Paragraph 2 it states: “Over time the composition of the Steering Group changed, reflecting a mixture of Councillors and members of the community”. This does not provide an accurate account of what actually happened. It should make clear that from June 2015, members of the community were removed from the Steering Group leaving only parish councillors. Members of the community were not allowed to participate in the SG’s activities thereafter.</p> <p>0.2 This mis-information is perpetuated in the final paragraph and the table of participants which suggests that all were involved until 2018. This is entirely incorrect and from June 2015 all consultation and plan preparation activities were undertaken by Councillors Colville, Vince, Kirk and Webster. It seems unlikely that this mis-information has been included accidentally and I have concluded that it is intended to exaggerate the role played in the development of the plan by members of the community.</p> <p>1 Introduction</p> <p>1.1 Public Involvement - Paragraphs 1.16 to 1.24. Following the workshop meetings in September 2015 there has been no significant attempt to involve the community in the development of the plan. All Steering Group meetings have been conducted in private; there have been no community events at which plan proposals have been presented for information or discussion; written submissions to the Parish Council have not been responded to and requests for meetings to discuss matters raised have been refused. The extent of public involvement in the development of the plan has again deliberately been exaggerated.</p> <p>4 Location of development and the built-up area boundary.</p> <p>4.1 Paragraph 4.3. This states that the BUAB will remain as Map B. This appears to be contradicted by Policy HK1 in which it states that Sites SA 28 and 29 will be incorporated into the BUAB</p> <p>5 Housing and Design Development</p> <p>5.1 Community-led housing. Paragraphs 5.4 to 5.10 and Policy HK2. The proposal for communityled housing was never part of the original plan proposals and has not been the subject of proper</p>

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					<p>consultation with the community. It should not therefore be included within this Neighbourhood Plan which is meant to reflect the wishes of the community. Affordable housing will be provided as an integral part (30%) of any substantial development which will meet the need identified in the Housing Needs Survey. These paragraphs and Policy HK2 should be omitted.</p> <p>5.2 Policy HK3: Dwelling Mix. This policy specifies a dwelling mix of 80% 1 and 2 bed properties, 20% 3 bed properties and 0% 4 and 4+ bed properties. I am doubtful that such a mix would enable a financially viable development given the housing density which needs to be achieved to ensure efficient use of land. Have developers been consulted to ensure that such a mix would provide a viable development opportunity? If such a mix is not viable the policy is undeliverable.</p> <p>8 Transport</p> <p>8.1 Paragraphs 8.6 to 8.9. – Car Parking. It is difficult to understand why a policy on parking provision has not been included. WSCC parking demand figures are not mandatory, and this seems an odd way of specifying what is a very important requirement. Also, given typical conditions currently apparent within the village, the WSCC figures appear to be inadequate – how can fractions of a space be provided (1.5, 2.2 etc.). A policy should be included with parking spaces at least equivalent to those specified in the 2016 draft plan (1,2,2,3 and 4 spaces respectively).</p> <p>9 Site Allocations</p> <p>9.1 No attempt has been made to take account of the clearly expressed views of the community with regard to preferred locations for development. It is totally against the provisions of the Localism Act (2011) and the Neighbourhood Planning Regulations (2012), which together establish the basis for the preparation of neighbourhood plans, to ignore the wishes of the local community and impose the opinions of the local district council.</p> <p>9.2 Site SA28 – Land south of Old Police House. A small portion of this site was included in the original plan proposal and in the consultation carried out up to September 2015. At that time the site comprised a narrow strip to the east of the existing houses but omitted the much larger area to the south behind their back</p>

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					<p>gardens. This smaller site was suitable for 7 new dwellings compared with the 25 currently proposed. The larger site has not been the subject of consultation with the community and should not therefore be included.</p> <p>9.3 Site SA29 – Land south of St Stephen’s Church. This site was not put forward in response to the original call for land and was not included in the original consultation activities. It was however inserted into the workshop consultation in September 2015. The proposed inclusion of the site was strongly opposed by the community. Two petitions opposing the site have been raised, the first signed by 141 residents and the second in July 2019 by 330, and strong opposition to it was voiced at a PC meeting in May 2019, one of the very rare opportunities the community has been given in recent years to offer an opinion on what was being proposed. The development of the site is clearly opposed by many residents and if the plan goes forward to referendum with it still included, it will provoke a campaign of strong opposition which is likely to cause it to fall. This site must be omitted.</p> <p>9.4 Sites at Jeffries Farm. Following the original call for land a number of fields at Jeffries Farm were proposed for development, including what is now a brown field site on the old chicken farm. These were originally assessed as sustainable and included within the original consultation activities. They were well supported by the community as suitable sites for development. In June 2015 when the steering group was re-constituted to include only parish councillors the sites were reviewed and excluded. At the September 2015 consultation workshop they were presented as “Sites no longer being considered”. The reasons for the exclusion were explored at the workshop and found to be spurious. When asked at the workshop whether the sites should be reinstated a clear majority of residents said they should. There is no reason to suppose that support within the community for development at Jeffries Farm has dwindled. This site should therefore be included within the plan as a replacement for Site SA29.</p>
058	001	Howard Edge	Resident		I fully support this plan.
059	001	Lorna Shimmen	Resident		I would like to comment on the proposed neighbourhood plan. While I agree with aims and objectives of the plan, it is the location of the proposed development which is causing me concern. I totally accept the need for new houses in Horsted Keynes in the

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					<p>next ten years and 69 seems a reasonable number.</p> <p>The proposed site SA28 south of the old Police House for 25 dwellings seems logical and sensible.</p> <p>The proposed site SA29 south of St Stephen's Church is problematic for several reasons. There is no adequate access to the site from Hamsland and a local green space would be destroyed.</p> <p>A far better location for this development would be the Jeffreys Farm site, already a brownfield site, which could easily have adequate access and would not destroy the natural beauty of the centre of the village.</p> <p>I hope you take these comments into consideration before progressing the neighbourhood plan.</p>
060	001	James Parsons	Resident		<p>I strongly oppose the adoption of the PC's neighbourhood plan. It has not represented the wishes of the majority of the village, has had committee members with clear conflicts of interest, has resolutely not challenged questionable AONB findings that rendered Jefferies Farm untenable but St Stephen's and Police Fields tenable, relied on desktop assessments of its consultants like Mr Frost to produce inaccurate and misleading conclusions, especially around traffic problems that would ensue in Hamsland and Challoners especially if the St Stephen's field was developed. In short it has been an utter disgrace and the idea that in any way they have followed the spirit or the legislation of the 2011 Localism Act 2011 is risible.</p>
061	001	George Holloway	Resident		<p>I strongly oppose the adoption of the Parish Councils neighbourhood plan for the following reasons among many:</p> <p>It has not represented the wishes of the majority of the village.</p> <p>It has appointed committee members with clear conflicts of interest that were not questioned at the time.</p> <p>It has resolutely not challenged questionable AONB findings that rendered Jefferies Farm untenable but St Stephen's and Police Fields tenable.</p> <p>It has relied on desktop assessments of its consultants like Lindsay Frost who has produced inaccurate and misleading conclusions, especially around traffic problems that would ensue in Hamsland and Challoners especially if the St Stephen's field was developed</p>

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					<p>In short it the process has been a disgrace and the idea that in any way the PC have followed the spirit or the legislation of the 2011 Localism Act is risible.</p> <p>As a current resident of Lewes road, and previously a temporary resident of Hamsland in 2019 I have serious misgivings regarding the increase in traffic this development would bring. Hamsland is already barely fit for purpose with cars parked all along one side and this development will cause so much more traffic on this road. Not to mention an increase in traffic driving up and down Lewes road, where there Is a lack of traffic calming measures and lots of children living on the road. It is already an accident waiting to happen.</p>
062	001	Sasha Rossi Ashton	Resident		<p>I am writing to express my view on the village plan, in particular the areas up for development.</p> <p>I find it hard to understand why the two sites settled on for development are StStephens field and Old Policeman’s field, when Jeffries farm has been discounted. StStephens field is patently not acceptable as the access to it is via limited width roads, which would cause unacceptable disruption to the current residents and the site would require the felling of trees.</p> <p>I have no issues with the policeman field bar that the traffic would have to come through the village which is difficult enough with the buses and traffic already.</p> <p>What I cannot understand is why Jeffries Farm site is excluded as it is</p> <p>A) on the right side of the village to reduce traffic disruption.</p> <p>B) the only brown field site so should be put forward first as the other sites use green field sites and as such are detrimental to the countryside</p> <p>C) has only been discounted due to its access which I believe is owned and able to be widened by the owners of the farm putting it forward.</p> <p>D)mid Sussex council have already tacitly agreed to the relocating the entrance to make it even safer.</p> <p>I am under the very strong impression that there have to be other reasons that this site has been discounted and would welcome an enquiry into it.</p>
063	001	Rhoda Miles	Resident		<p>I would like to thank everyone who’s been involved with the preparation of the NP, in particular David Colville, Sarah Webster</p>

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					<p>and planning consultant, Lindsay Frost, for all their hard work, time and effort in getting to this stage.</p> <p>I've read through the plan and associated documents and it's clear that we now have a comprehensive, professionally prepared NP with 17 policies and a considerable amount of detail and information about the parish which I'm minded to support at referendum.</p> <p>However, I'm very conscious of the fact that many residents are concerned about the site allocations for housing, which has been a divisive and contentious issue for many years. So, if it is at all possible at this late stage, I would prefer the NP to be submitted with all the detailed site assessments but without proposing any housing sites, to give it the best chance of getting the majority of the community to support it at referendum.</p> <p>I really feel we need to have a NP in place as a framework for the community to review and revise in the future and it would be a real shame to miss this opportunity.</p>
064	001	Mary Mitchell-Gogay	Resident		<p>I write to say that I strongly oppose the adoption of the PC's neighbourhood plan.</p> <p>It has not represented the wishes of the majority of the village.</p> <p>It appears that the Council has appointed committee members with clear conflicts of interest that were not questioned at the time, and it has resolutely not challenged questionable AONB findings that rendered Jefferies Farm "untenable" but St Stephen's and Police Fields "tenable". This cannot make sense.</p> <p>It appears indeed to have relied on desktop assessments of its consultants who have produced inaccurate and misleading conclusions, especially around traffic problems that would ensue in Hamsland and Challoners - especially if the field behind St Stephen's was developed.</p> <p>Overall the process has been a disgrace, and the claim that in any way the PC has followed the spirit or the legislation of the 2011 Localism Act is entirely unconvincing.</p> <p>I hope the council will reconsider.</p>
065	001	Alex Hooper	Resident		<p>As a resident of Bonfire Lane I would like to make my objection known to the Neighbourhood Plan and the selection of the St Stephens Field site as a proposed development.</p> <p>It has not represented the wishes of the majority of the village,</p>

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					<p>has appointed committee members with clear conflicts of interest that were not questioned at the time, has resolutely not challenged questionable AONB findings that rendered Jefferies Farm untenable but St Stephen's and Police Fields tenable, and relied on desktop assessments of its consultants like Lindsay Frost who has produced inaccurate and misleading conclusions, especially around traffic problems that would ensue in Hamsland and Challoners especially if the St Stephen's field was developed. For anyone who lives in the vicinity of Hamsland, the traffic / parking situation is already at breaking point and the road is now effectively a single track. Any proposed additional traffic to this is bordering on reckless.</p> <p>It seems that the PC have back the most disruptive site available, defying a petition by 330 residents in 2019, and again excluded the generally considered preferred option of "Jeffrey Farm Northern Field" which is widely supported by the residents. In addition the proposed development of St Stephens field threatens many mature trees that current screen the site. By suppressing the Jeffreys farm option and promoting a site rejected by 330 residents last year, the Parish Council is not giving "local people" a chance to set the future for their own village, but pandering to what Mid Sussex DC want.</p>
066	001	Lisa Brigden	Resident		<p>I strongly oppose the neighbourhood plan. This does not represent the wishes of the majority of the village. Misleading and inaccurate conclusions have been produced especially regarding traffic problems around Hamsland and Challoners that would happen if the St Stephens Field was developed. The plan needs to be readdressed to properly reflect residents' opinions and not ignore a petition signed by 330 residents. The Jeffrey's farm site is more widely supported by the village and is the least disruptive but has been excluded and should be challenged.</p>
067	001	Paul & Barbara Fairweather	Resident		<p>A) General Comments</p> <p>HKPC has not demonstrated that it has acted to protect the welfare of the residents of the parish against the housing demands imposed by central authority, or even to mitigate their adverse effects. Rather it has shown un-willingness to confront demands made to develop areas of the village, and even though that resistance may have been known to be futile and ultimately</p>

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					<p>proved unsuccessful, at least some attempts would have been seen to be made. Parish Councils representing other communities have done this with varying degrees of success, but do have the appreciation of their residents for having made the attempt. Repeatedly at HKPC meetings residents' concerns have been brushed aside, the HKPC hiding behind Central Planning Policy to actively argue against genuine issues that were raised.</p> <p><u>Quote from recent articles placed in the P&P by HKPC:</u> Once the responses have been reviewed and any changes made, it will be submitted to MSDC for further public consultation and then consideration by an independent Examiner to determine whether it meets the basic conditions.</p> <p>Comment: - The DNP now published is the only opportunity for the community to see what it contains and for comments to be made, but having stated that those comments will be reviewed, there is no information regarding how any changes that result from this consultation process will be acted upon and how that information will be communicated. All residents have a right to see the final version of the DNP that HKPC will be submitting to MSDC, otherwise there is little point asking for comments.</p> <p>Action required: Distribute information by all reasonable means that identifies and describes what changes have been made, and publish the version of the final DNP on HKPC' s website.</p> <p>Site Allocations</p> <p>Comment: - HKPC's decision to allow MSDC to allocate the sites to be considered for development opposed the repeated strongly expressed preference of a large proportion of the residents of the village. However, by transferring to MSDC the responsibility for rejecting the sites on Jeffrey's land in favour of that at St. Stephen's Field enabled HKPC to avoid having to address the conflict of interest issue that was levied against it.</p> <p>Following this undemocratic decision, such further discussion about these two sites that was reluctantly permitted by HKPC has been subject to prevarication and mis-information whilst HKPC unwaveringly defended its opposition to the Jeffreys sites without just cause or logical explanation, actions that expose it to the accusation of yielding to vested interests. In addition, no efforts</p>

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					<p>were made to correct the in-accurate information that was being quoted in order to render the Jeffrey's sites un-acceptable for development.</p> <p>Contrary to the claims of those with a vested interest in preventing development of the Jeffrey's sites, the canvassing of a good proportion of the households in the village produced a petition bearing 330 signatures against building on the St. Stephen's Field Site and supported the claim that there was a strong preference for the Jeffrey's sites instead. Instead of being investigated by HKPC as reflecting the views of at least a third of the adult population, this petition was completely rejected on the grounds that MSDC had decided against it. This demonstrated a failure to act in accordance with the concerns and interests of a large proportion of the community.</p> <p style="text-align: center;">2</p> <p>Development of the St. Stephen's Field site will be:-</p> <ul style="list-style-type: none"> • un-desirable because it damages the lives of residents of a large portion of the village without benefit • very difficult due to the restricted road access to the site and then onto the site • extremely disruptive to all the 300+ residents of the cul-de-sac in advance of and during construction • changing the character of the entire area as a result of the road works necessary to get to the site • displacing wildlife and requiring the destruction of many trees that will leave the site open and exposed. • adding significantly and permanently to the already acute traffic congestion in a huge cul-de-sac • overloading all the main services • ignoring the more than 330-signature petition calling for its removal from the Site Allocations DPD • ignoring the strong preference for development of the Jeffrey's sites <p>None of these issues can be levied against the Jeffrey's sites where access is far less disruptive, the site well concealed and construction work will interfere with far fewer residents and to a much-reduced extent.</p>

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					<p>Action Required: The DNP should demonstrate that due to local public demand HKPC has grave reservations over the suitability of developing the St. Stephen's Field site over those on the Jeffrey's land and that HKPC will be asking MSDC to set aside its earlier decision and to re-examine the two sites using currently accurate information.</p> <p>B) Specific Comments 1 - 10</p> <p>1) <u>Quote from Draft Neighbourhood Plan:</u> Forward The processes of consulting parishioners and producing the Horsted Keynes Neighbourhood Plan were managed by a volunteer Steering Group comprising (2014-2018) Comment 1: - The list below this heading makes no distinction between those members and volunteers who were only in place during the construction of the earlier DNP now withdrawn and those who are responsible for the DNP in its present form. This gives a misleading impression of the composition of the Steering Group that should be corrected. Action required: Redesign the table of names to show those involved with the defunct DNP who have no responsibility for the content of the current DNP and with a separate section listing those that do.</p> <hr/> <p>2) <u>Quote from Draft Neighbourhood Plan:</u> DP20 requires developers to provide, or contribute to, the infrastructure and mitigation measures necessitated by their development proposals Comment 2: - There is no evidence that the DNP has reflected this requirement for "<i>mitigation measures necessitated by their development proposals</i>" in respect of its support for the development of St. Stephen's Field. Nothing is contained in the DNP to identify what mitigation HKPC will be able to call for and achieve in that location. Action required: Describe in the DNP how the HKPC will protect residents disrupted by this development by ensuring that developers provide mitigation.</p> <p style="text-align: center;"><u>3</u></p> <p>3a) <u>Quote from Draft Neighbourhood Plan:</u> 2.36.</p>

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					<p>Community consultation has also identified that parking on the roads within the village is a significant concern. The policies which will govern the development of new sites for housing will ensure both that nothing will be done to reduce the existing limited parking provision and that sufficient parking will be provided within the sites themselves to avoid exacerbating the existing parking problems.</p> <p>3b) <u>Quote from Draft Neighbourhood Plan:</u> 8.6. There is already a high incidence of on-street parking on existing roads which can make it difficult for vehicles to pass, particularly buses and larger commercial traffic.</p> <p>Comment 3: - There is no evidence that the DNP has reflected this requirement to "<i>ensure that nothing will be done to reduce the existing limited parking provision</i>". In fact, when supporting the development of St. Stephen's Field despite the admission of Mr Frost (their own Consultant) that on-street parking in Hamsland will have to be significantly and permanently disrupted in order for this to take place, HKPC exactly contradicts its own policy.</p> <p>Action required: Describe in the DNP how the HKPC will ensure that nothing will be done to reduce on-street parking affected while this development takes place.</p> <hr/> <p>4) <u>Quote from Draft Neighbourhood Plan:</u> 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</p> <p>Comment 4: - There is no evidence that the DNP has reflected this requirement for "<i>leisure and community facilities – such as play areas</i>" in the Developer's published plan for St. Stephen's Field.</p> <p>Action required: Describe in the DNP how the HKPC will ensure that no leisure and community facilities will be lost by this development.</p> <hr/> <p>5) <u>Quote from Draft Neighbourhood Plan:</u> DP37</p>

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					<p>supports the protection of trees, woodlands and hedgerows and further planting</p> <p>Comment 5: - There is no evidence that the DNP has upheld this requirement to <i>protect trees</i> when supporting the development of St. Stephen's Field despite having the clear threat to several trees repeatedly identified to HKPC.</p> <p>Action required: The DNP should contain a statement that fully demonstrates how the HKPC will ensure the protection of all the trees under threat by this development.</p> <hr/> <p>6) <u>Quote from Draft Neighbourhood Plan:</u> 33. A CLT is a community-led organisation that provides land, homes and other assets to meet the long-term needs of its local community.</p> <p>Comment 6: - The DNP describes the benefits of a Community Land Trust and notes that it supports the one being set up, but this initiative (entirely separate from any Council-sponsored development) is the only way that housing can be provided that can be guaranteed to be available for those households in the village that are identified in the DNP as needing affordable housing. Affordable housing required to be built as part of the two developments supported by HKPC cannot be reserved for these local households but will be allocated by MSDC from those on their housing register under the priority rules that apply – as stated in the DNP under the heading Community-led Housing. This situation contradicts the DNP's claim that HKPC's failure to oppose development plans for the village is in order to provide housing to suit local needs.</p> <p>Action Required: Remove the claim that the DNP's Housing Policy provides home for local families.</p> <p style="text-align: center;">4</p> <p>7) <u>Quote from Draft Neighbourhood Plan:</u> POLICY HK7: LOCAL GREEN SPACES The following areas as shown on the Policies Map are designated as Local Green Spaces:</p> <ul style="list-style-type: none"> • Village Green • Recreation Ground (including the tennis courts) • Cricket Field. <p>These Local Green Spaces will be protected for their</p>

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					<p>amenity and recreational value, and the contribution they make to the character and appearance of Horsted Keynes. Development on Local Green Spaces will only be supported in very special circumstances, where it contributes to the functioning of the space and does not detract from its open character and appearance</p> <p>Horsted Keynes benefits from a high quality network of green spaces including a village green, recreation ground, and cricket field, which are highly valued locally for both their amenity and their recreational use. There is a third recreation ground on the southern edge of the village.</p> <p>Comment 7: - This description of the village makes a casual reference to "<i>a third recreation ground on the southern edge of the village</i>" but fails to name it. This is of course Constance Wood Field which lies to the south of the properties in the first part of Hamsland, and is separated from St. Stephen's Field by a strip of land that is part of what MSDC refer to as Council Field. MSDC has now officially described the whole of Council Field as a potential development site.</p> <p>This statement seems to originate from HKPC's 2015 promotion of Constance Wood Field as a potential development site when connected to St. Stephen's Field via Council Field, a scheme later withdrawn and now no longer included in the DNP, but from MSDC's statement it is clearly still regarded by them as a latent opportunity. The DNP makes no effort to exclude Constance Wood Field in Council Field from Planning considerations. Instead, by pointedly failing to actually name Constance Wood Field as a Local Green Space and a recreational ground in its description of "<i>the high-quality network of green spaces</i>" (thereby affording it the protection such an area would enjoy as described in the DNP) specifically avoids the need to do so. It is also omitted from the map on page 62.</p> <p>This leaves the clear implication that this green space is under positive consideration for development.</p> <p>Action Required: The DNP should (a) include Constance Wood Field in its list of Green Spaces, (b) add it to the map on page 62 and (c) state categorically that it is not under consideration for development under this DNP.</p>

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					<p>8) <u>Quote from Draft Neighbourhood Plan: Map on page 62</u></p> <p>Comment 8: - Included on this map is the illustration of the Built-Up Area Boundary that runs quite clearly along the ends of the back gardens of properties in Hamsland. This boundary is fiercely defended by HKPC when it runs along Sugar Lane as being another reason to reject development on Jeffrey's land, whereas breaching this boundary to allow development on St. Stephen's Field is supported. This is the application of double-standards and is not defensible.</p> <p>Action required: Reassess and reverse HKPC's presumption against development of Jeffrey's land and reflect in the DNP the preference for this site expressed by the majority of residents in the village, thereby providing more dwellings.</p> <hr/> <p>9) <u>Quote from Draft Neighbourhood Plan: Under 5.7 the DNP describes how Exception Sites seek to address the needs of the local community by accommodating in perpetuity households who are either current residents or who have an existing family or employment connection with the parish.</u></p> <p>Comment 9: - While this appears to offer accommodation to those local households that require it, these can only take advantage of them if these dwellings are erected outside the built confines of the village. As there is no provision for this in the DNP nor encouragement for it to take place, its inclusion in the DNP is therefore pointless.</p> <p>Action Required: Reference to Exception Sites should be removed in order to properly reflect what the DNP is able to deliver.</p> <p style="text-align: center;">5</p> <p>10) <u>Quote from Draft Neighbourhood Plan: Support the Youth Club Provision of meeting place for the youth club. Hire of Youth Leader</u></p> <p>Comment 10: - The DNP does not explain of what this Youth</p>

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					<p>Club consists. Claiming to support an unspecified speculative function is both un-helpful and disingenuous.</p> <p>Action Required: Give more detail in the DNP about the Youth Club and what form HKPC's 'support' for it is to take. If none exists, remove reference to it from the DNP.</p>
068	001	Mike Palmer	Resident		<p>I would like to make the following comments on the Draft Neighbourhood Plan.</p> <p>I am strongly opposed to the inclusion of St. Stephen's Field in the revised and updated neighbourhood plan. It would be senseless to build in St. Stephen's Field, a green-field site in an ANOB, adjacent to what is already the most densely populated and crowded cul-de-sac in Horsted Keynes, a part of the village already experiencing traffic and parking problems for the existing residents. Developing here is clearly contrary to Objective 5 of the plan 'To reduce the negative impact of traffic and roadside parking...' It will only make things much worse in this part of the village. The Parish Council must take notice of the 330 residents who opposed this site by petition. It is also contrary to objective 6 of the plan 'To minimise the adverse environmental effects of new development.'</p> <p>Jeffrey's Farm should be promoted as the best site in the village for development, already being a brownfield site. Re-development here would have far less impact on the AONB. Potential traffic from this site would quickly leave the area via Sugar Lane and so development here would have far less negative impact on the village.</p> <p>The plan also fails to list Constance Wood Field as a significant local green space. This facility is enjoyed by many, particularly dog walkers. It has also been one of the sites for MSDC's Blue Heart Campaign for the reintroduction of wild flowers. It should be included in the draft report.</p> <p>This plan must be redrafted to reflect residents' opinions, particularly to St. Stephen's Field where development is clearly impractical, undesired and environmentally damaging.</p>
069	001	Clive Illingworth	Resident		<p>I would like to make the following comments on the Draft Neighbourhood Plan.</p> <p>I am strongly opposed to the inclusion of St. Stephen's Field in the revised and updated neighbourhood plan. It would be</p>

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					<p>senseless to build in St. Stephen's Field, a green-field site in an ANOB, adjacent to what is already the most densely populated and crowded cul-de-sac in Horsted Keynes, a part of the village already experiencing traffic and parking problems for the existing residents. Developing here is clearly contrary to Objective 5 of the plan 'To reduce the negative impact of traffic and roadside parking...' It will only make things much worse in this part of the village. The Parish Council must take notice of the 330 residents who opposed this site by petition. It is also contrary to objective 6 of the plan 'To minimise the adverse environmental effects of new development.'</p> <p>Jeffrey's Farm should be promoted as the best site in the village for development, already being a brownfield site. Re-development here would have far less impact on the AONB. Potential traffic from this site would quickly leave the area via Sugar Lane and so development here would have far less negative impact on the village.</p> <p>The plan also fails to list Constance Wood Field as a significant local green space. This facility is enjoyed by many, particularly dog walkers. It has also been one of the sites for MSDC's Blue Heart Campaign for the reintroduction of wild flowers. It should be included in the draft report.</p> <p>This plan must be redrafted to reflect residents' opinions, particularly to St. Stephen's Field where development is clearly impractical, undesired and environmentally damaging.</p>
070	001	Peter Vince	Resident		<p>I congratulate those who have produced the latest plan for our parish though the 70 + pages do make it no easy task to absorb and those many elderly folk in our village without computers whose opinions are valuable might have found it a great challenge.</p> <p>There have been dramatic changes to life in our village many of which will have a long term or permanent effect. These are not reflected in the draft plan the drafting of which no doubt pre dates these changes.</p> <p>Firstly there is the trend towards working from home and the great emphasis which is now placed on physical exercise.</p> <p>I have lived at Birch Grove since 1980 and with my connections with St Giles Church and my long term support of our local businesses (especially The Green Man !) I have seen how the</p>

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					<p>Birch Grove Road connecting our two conservation areas has changed. The NP makes clear the importance of our rural roads and the need to preserve them. There is every sign of this importance being eroded. It is now clear that the owner of the large area of land between the junction with the road to Danehill and Westall House has aspirations to develop that large area and the fact that it made the last page of the NP shows that those aspirations may not be in vain.</p> <p>Reverting to the Birch Grove Road, of late the same landowner has made dramatic changes by the removal or thinning of old woodland areas which serve to 'suburbanise' the area and make where possible the road more motor traffic friendly.</p> <p>At the same time the use of the road by villagers and those working from home for recreation and exercise has increased steadily. HK has five roads converging at the village. Every one of these bar one has steep hills within a short distance of the village. The one road which is flat is the Birch Grove road so many walkers, cyclists and equestrians of all ages use that road in preference to the others. Also all of the other roads are dangerous for such use either having no verges or blind bends. Any development which hinders such use must surely be resisted.</p> <p>The NP also refers to property values in the village. I think that is an intractable problem which building a few so called affordable houses will not solve. A newish terraced house in village centre is on the market for half a million pounds. Any affordable new house ceases to be affordable when it's first buyer sells.</p> <p>The two parcels of land recommended for approval will when developed have a great adverse effect on neighbouring residents which is very sad.</p> <p>I realise that there are great pressures from 'above' to build more houses. I just wish they would leave Horsted Keynes alone!</p>
071	001	Marjorie Fritz	Resident		<p>Although I appreciate the amount of work that has gone into the draft neighbourhood plan I will not be able to support it at the referendum.</p> <p>This reluctance is because of the site allocations for housing development that are muted. Access to St Stephen's Field site would be very restricted and is very unpopular amongst residents</p>

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					as a suggested site for development. There are 2 much more suitable sites available that are not mentioned - Jefferies Farm site and Birchgrove site.
072	001	Peter Raney	Resident		<p>Please note my objection to the currently proposed sites for building in the Village. The police House fields do not have suitable access points - the options are to place access on a bend or close to two existing junctions. The fields behind Hamsland are accessed via a narrow road which was never designed to cope with construction traffic.</p> <p>It seems the options put forward are those least favoured by the Village (or most disliked more accurately) and the one site where building would be welcomed (Jefferies Farm) and would offer answers to most if not all of the problems, (e.g. parking, traffic) has been turned down.</p> <p>If we absolutely must have more housing forced upon us it a sense to site it in a place which causes least annoyance amongst the existing residents. It would also be necessary to replace the crumbling Victorian water main beforehand, as it can only just cope with the pressure required to supply the current number of consumers.</p> <p>The decisions put forward make no sense and flies in the face of Village opinion and preferences.</p>
073	001	Barry D. Heasman	Resident	Caroline Heasman	<p>During the first week of October 2019 my wife and I, along with more than 325 other residents of the village, both signed a petition that called for the parish council to exclude St Stephen's Field from the Neighbourhood Plan. This was ignored by the parish council who seem to be steam rolling over the wishes and opinions of the parishioners they were elected to serve, it is my believe that a parish council is elected to act for the parishioners not against them. It is our feeling that the Jeffrey's Farm Site is widely supported for development by the majority of the parishioners and will create far less disturbance to the village as a whole during any development. Hamsland is a cul-de-sac serving 154 homes, many consider that it is almost a one way street, and because of the parking limitations, it is very often un passable when ambulance crews are attending the needy residents on either side of this narrow access road. We note that "Constance Wood Field" has not been included in the NP as a green site. As it is a much used green site in the village for dog walking and</p>

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					recreational activities this field must remain a green site and therefore should be included in the NP as such. It is a shame that we have a Parish council (or some members of) that are clearly not interested in taking onboard the opinion of the parishioners.
074	001	Kerry Heasman	Resident		<p>As a resident of Horsted Keynes, I along with over 300 other residents signed a petition to get St Stephens Field removed from the neighbourhood plan. It seems that the petition along with many residents turning up to parish council meetings to object to St Stephens Field being in the NP has basically been ignored. I have spoken to many people and heard many people speak about the NP,</p> <p>I have not heard one person say St Stephens Field is a good idea. Me along with many others have expressed that Jeffrey's Farm is far better option for the NP.</p> <p>I believe that putting 30 homes behind the church will have a major impact on the people that live along Hamsland & Challoners using a road that is basically a single lane because of the amount of vehicles already using the road. I don't know how anybody thinks that potentially having another 60 vehicles using Hamsland is a good idea, it's already dangerous enough as it is.</p> <p>I really hope that the Parish Council do as they say they do and listener to and take notice of the parishioners , because at the moment it doesn't feel like they do.</p>
075	001	Karen & Tim Griffiths	Resident		<p>We consider this plan fails to meet basic conditions and in the unlikely event it is to proceed to referendum, would not support it. Concerns are:</p> <ol style="list-style-type: none"> 1. This current plan has not been produced from the neighbourhood but from two councillors who support MSDC desktop site allocations more than the best interests of parishioners they represent. There has been a distinct lack of community engagement with much fudging of data used to evidence this and other essential requirements. 2. Assessment criteria in site appraisals has been inconsistently applied across sites with particular discrimination against Jeffreys Farm sites. 3. Heavy reliance on third party desk top assessments with no evidence that local knowledge or community feedback from previous Regulation 14 and 16 consultations has been

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					<p>considered to shape a potentially adoptable plan.</p> <p>4. Both sites proposed will cause the maximum traffic problems through the length of the village and along the next most congested road, Hamsland. As such this materially and negatively affects the fabric of a rural community.</p> <p><u>Community engagement</u></p> <p>1.0 A steering group representing all areas of the village was dismantled by the PC in July 2015 who formed a new steering group (SG) of four councillors, two of which had clear and documentable conflicts of interests on Jeffreys Farm sites.</p> <p>1.1 The PC allowed the SG to proceed unchecked, even when concerns were raised from numerous parishioners. Only after complaints were escalated to MSDC did the SG become void with the whole PC taking on SG role. No members of the public were sought to assist in developing a NP.</p> <p>1.2 Since the PC has taken on responsibility of producing a NP a number of splinter groups have formed; Hamsland Action Group, Save Our Sledging Field, OurHorstedKeynes and a CLT group, indicating the lack of engagement, representation and trust parishioners feel they have in the process.</p> <p>1.3 There have been no dedicated NP meetings since November 2015.</p> <p>1.4 Last post on NP Facebook page -April 2016, Twitter-March 2015</p> <p>1.5 At a meeting held in Martindale Centre where Lynsey Frost presented his recommended sites, a vote was taken despite a large contingent of parishioners present being against sites proposed. Parishioners were only allowed to speak AFTER sites were voted through by PC, thereby community engagement was not sought and did not influence site selection.</p> <p>1.6 NP items have a slot at general PC meetings which allow for public participation to comment on Agenda items only. Minutes for previous meetings are sometimes not available for public viewing beforehand,</p>

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					<p>further hampering community involvement. Opportunities for public to comment at the end of meetings are too late if decisions have already been voted on during meetings as the public comment is not permitted during meetings.</p> <p>1.7 There has been consistent and prolonged failure on the part of the PC to acknowledge and rectify errors brought to their attention relating to Jeffrey's Farm (JF), demonstrating poor engagement with site owners. This has resulted in out dated information being used to inform subsequent professional reports and allowed them to suffer the same. Now issues with a covenant have been cleared, the PC has invented access issues as a reason to discredit the site.</p> <p>1.8 Since March 2020, PC meetings have been via Zoom with a capacity to host 100 participants, including PC members. If the extremely low attendance is anything to go by, then the PC have disengaged with the community and have done so for some considerable time.</p> <p>1.9 As a frequent attendee of PC meetings over the years, I have noticed these do not operate inclusively, debate from within is not encouraged and opinions of councillors not actively sought by the Chair. Where comments have been raised by councillors, they have gone unanswered or dismissed unless they reflect the opinions of the two councillors delivering the plan.</p> <p>1.10 The community have never been consulted on the larger PHF site, only the smaller site bordering Birchgrove Road. The first time for public engagement on this site is at this Regulation 14.</p> <p>1.11 The PC had already removed Jeffrey's Farm sites, with exception of farm buildings, from being discussed at September 2015 workshops, against the advice of their planner. At the workshops participants were asked 'Do you think it is correct to no longer consider this site?' There has been widespread community support for Jeffrey's Farm site, evidenced by comments made at September 2015 workshops that disagreed with the</p>

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					<p>PC's decision and through previous Reg 14 and 16 representations. The PC 'note' comments, but fail to act on those they don't agree with.</p> <p>1.9.1 When amendments were identified to be made to the plan, there followed a reluctance on the part of the Chair to make them, such as indicating that access to St Stephens field site is only achievable via Hamsland and not via Bonfire Lane, inferred by supporting documents. Requests for changes to be circulated to PC before issuing the plan were met negatively, indicating discord and frustration amongst some councillors.</p> <p><u>2.0 Site appraisals- omissions and errors</u></p> <p>2.1 Under green spaces- Constance Wood Field is a green space in Horsted Keynes and has not been recorded as such. The NP should seek to protect it.</p> <p>2.2 Pg 21 PHF- AONB assessment. No mention of a PROW running through PHF site, yet one running through land at Lucas Farm is deemed to <i>affect public enjoyment of it (PROW)</i>.</p> <p>2.3 No mention of large mature oak being impacted by visibility splays into PHF.</p> <p>2.4 Despite 'high' impact on AONB, is allocated in preference to sites with less impact.</p> <p>2.5 Deems '<i>minor improvements required</i>' to achieve safe access which requires felling of trees and re-siting bus stop, none of which are mentioned.</p> <p>2.6 Pg 23. AONB assesses St Stephens Field as having low impact on AONB. This assumes the line of mature oak and hornbeam trees to the western boundary remain intact. Pg 24. <i>Trees/TPO's. Trees along southern and western boundaries of the site , which need to be safeguarded as continuing screening to the site.</i> No evidence provided that this can be achieved.</p> <p>2.7 I understand MSDC have advised its own Tree officer against putting TPO's on the line of mature oaks and hornbeams along the western boundary of St Stephens site that borders land owned by MSDC, but did put TPO's on immature birch and sycamore trees because trees need to be protected in the rural landscape, on land that did not form part of any proposed development at Jeffrey's Farm. Inconsistencies do not allow for objective assessments.</p>

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					<p>2.8 Assessment of access into St Stephens field site has not been sought to assess viability, yet grounds of access have been used to remove Jeffrey's farm buildings continuing into this version of NP. Inconsistencies do not allow for objective assessments.</p> <p>2.9.1 In its conclusion, <i>access to St Stephens site requires improvement, but can be achieved within existing highway land on Hamsland</i>. Really? Anyone with local knowledge of the site that has read the site owners transport report would question whether this can be currently achieved. Inconsistencies do not allow for objective assessments.</p> <p>3.0 Jeffrey's Farm-Pg 26.</p> <p>3.1 AONB assessment- low impact with conditions- <i>farmstead model on footprint of existing buildings</i>. JF has never been a farm with traditional buildings that would transpose into a legally compliant and attractive residential development on the existing footprint. Residential developmental creep negatively impacts on the site being able to continue as a working farm. This would be obvious to anyone who has visited the site and it is disappointing there has been no engagement with the landowner on mitigation measures. If such artificial demands are required on land that has already seen development, why is similar criteria not applied to green field sites being proposed for NP?</p> <p>3.2. The AONB made the 'low' JFB's assessment based on 18 dwellings and not 6, which is a number imposed by PC following a phone call from a parish councillor the night before announcing chosen sites for the now withdrawn NP stating 'Accept 6 dwellings or we will pull it from the plan'. The capacity of the existing footprint would yield far more than the 6 dwellings. Disregarding a site because it is not viable to deliver amended HK housing mix is unacceptable.</p> <p>3.2.1 NP housing mix should follow that of MSDC, which HK's does not. What feedback has the PC had from site owners regarding achievability of housing mix?</p> <p>3.3 <i>Existing access unsurfaced and has inadequate visibility onto Sugar Lane to serve new residential development, even on a small scale.</i></p> <p>The access point and visibility from it has been used by vehicles, including farm machinery for decades and has not changed since the site was allocated by the PC to go into the first and second</p>

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					<p>versions of the NP.</p> <p>3.4 Where is the evidence to support that access cannot be achieved, or the mitigation measures explored to achieve it? The PC cannot assume other sites can achieve safe access without seeing accurate reports, but prohibit a site that has twice been deemed to be achievable, or ignore professional highways advice that promotes using an access to the north between trees, and therefore without removal of trees they seek to protect on JF but happy to see removed on PHF (large oak, to achieve visibility splays) and St Stephens (western boundary) sites. Inconsistencies do not allow for objective assessment and there is no place for discrimination.</p> <p>3.5 <i>However, even it could be made technically adequate for this scale of development - for example, by re-surfacing of existing access track and northward realignment of a short length close to junction with Sugar Lane to achieve better visibility and reduce conflicting turning movements at junction between Sugar Lane and Lewes Road - there would be a loss of tree and hedgerow vegetation which would be harmful to the AONB.</i> There is no evidence provided to support this statement and it is for the AONB to comment on any impact on the AONB, which have assessed the site as 'low', and not the PC.</p> <p>3.5.1 Utilising the existing highway to widen St Stephens entrance has been deemed appropriate and without question but this possibility has not even been considered for JF buildings site, which is the only site required to deliver an access point to have a low impact on AONB. Either all sites are required to deliver this, or none of them are. Inconsistencies do not allow for objective assessments.</p> <p>3.5.2 Proposed access points on both PHF and St Stephens sites are flawed in their access and transport statements; facts that have not been acknowledged by PC who should be fully aware of them, given the local knowledge they have of the area.</p> <p>3.6 <i>A completely new access to the site (further north) would be even more harmful to the AONB.</i></p> <p>This deviates from 2018 plan whereby the PC, who initially refused to acknowledge this had even been suggested by WSCC Highways as an option but subsequently stated without consultation with the site owner, that moving the access further</p>

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					<p>north was not thought to be viable for the owner. Whilst not the remit of the PC to make this decision, the impact of the access point to the site is now cited as a reason to grade JF access 'high' and the reason preventing allocation.</p> <p>3.7 ALL new development is harmful to the AONB, and should receive the same AONB rating, particularly when the sites being proposed to go forward into the NP are greenfield sites requiring new access points and tree removal but JF proposes using an established or alternative access point, as recommended by WSCC Highways and not objected to by MSDC or WSCC in a recent planning application.</p> <p>3.8 Jeffrey's Farm access could easily be widened to provide pass points and without removal of trees. The land required to achieve this is in the same ownership as JF site, a fact made known to the PC but somehow was not noted by the planning inspector assisting with NP who stated this was in 3rd party ownership. JFB's is the only site required by PC to deliver an access point to have a low impact on AONB, a requirement not required by any other site. Either all sites are required to deliver this, or none of them are. Proposed access points on both PHF and St Stephens sites are flawed in their access and transport statements; facts that have not been acknowledged by PC who should be fully aware of them, given the local knowledge they have of the area</p> <p>In summarising these as reasons for not allocating the site, the NP is deeply flawed and the PC has demonstrated a lack of objectivity and open discrimination in assessing sites. Further inconsistencies can be found in:</p> <p>3.8 Pg 29 AONB assessment site 971 is bordered on two sides by modern and old residential dwellings- <i>High impact on the AONB due to loss of medieval field and development out of character with the settlement pattern of Horsted Keynes</i></p> <p>There is no acknowledgement about 971 being already compromised by existing development.</p> <p>No reference that developing other green field sites is 'out of character with the settlement pattern of Horsted Keynes'. The PC have judged this only applicable to JF and not to other sites</p> <p>Compare to AONB assessment of St Stephens Field Pg 23, which also borders modern housing on two side: <i>Low impact on</i></p>

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					<p><i>AONB and reasonably well related to the village, subject to detailed design. Part of a medieval field system , but <u>already compromised by existing development</u>.</i></p> <p>This assessment assumes trees along the west and south boundaries remain intact.</p> <p>And on larger PHF site Pg 21 High impact on AONB due to loss of medieval fields and development isolated from the village core, uncharacteristic of settlement pattern, if both northern and southern fields developed.</p> <p>3.9 There is confusion on the labelling of PHF sites. The site being proposed is the 'north' site (labelled land to the south of PHF) with the 'south' site forming land below the tree line. It appears the Sustainability assessment uses the smaller north site (there being two 'north sites; a small one and larger one)assessment to justify decision.</p> <p>4.0 No such acknowledgement about being near existing development for site 971 or that developing on other green field sites is 'out of character with the settlement pattern of Horsted Keynes'. The PC have judged this only applicable to JF and not to other sites.</p> <p>The NP sustainability assessment demonstrates that JFB's has the lowest impact of all sites on AONB and should still be considered as a potential site due to lack of engagement with site owners and unfounded reasons around access errors.</p> <p>Desk top exercises should support and along with personal opinions of councillors, should not be so heavily relied upon to inform HK NP.</p> <p>The PC, having assigned themselves sole responsibility for delivering a NP, have alienated the community, supported divisive activity and appear to have no appetite to deliver a sound and robust plan.</p> <p>It is a mistake to believe that speculative planning applications will not eventually be approved without a NP in place and attempts to deliver a plan the PC know will not be supported at referendum, is reckless.</p> <p>Whilst comments have been directed at the PC who have joint responsibility for NP, we acknowledge that some councillors have had the courage to raise concerns and challenge the process. We</p>

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					extend our thanks and appreciation to those who have the long-term future interests of the village at heart. It can't be easy giving up free time in such a toxic environment, and for that, we salute you.
076	001	David Grounds	Resident		<p>I'm writing in relation to the proposed village plan for adding housing.</p> <p>I understand that we, as a village, are required to add more housing, and that finding suitable sites can be a challenging task. I attended the meeting the parish council held at the Martindale where various options were discussed and initial recommendations were made.</p> <p>Jeffrey's Farm</p> <p>What was disappointing at the time of the Martindale meeting, and remains so now, is the very weak arguments against the proposed option at Jeffrey's Farm, which from the point of view of this villager, who is not directly affected by any of the proposed development sites, is clearly the best and most obvious option. This village looks towards Haywards Heath, and the Jeffrey's Farm site would provide a substantial number of the houses required, without adding to the volumes of traffic through the village. The principal objection to this site at the Martindale meeting was that it would expand the village beyond its existing natural boundaries. As Sugar Lane is the only road on the outskirts of the village that does not have houses on both sides of it, this strikes me as a very weak argument for this location. This is even more stark as the proposed development behind the Police House at the other end of the village, which the Parish Council is enthusiastically backing, is effectively expanding the natural boundaries of the village in precisely the same way as Jeffrey's Farm would.</p> <p>If the village has to grow, then squeezing in new development without expanding the village is an approach that ultimately reduces the quality of life for all residents of the village. What's the end game in ten, twenty or thirty years' time after further requirements from government for new housing? Development on the Rec or the cricket pitch? Make the right decision and let the village expand naturally on the edges to add the required housing.</p>

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					<p>I am also aware of the AONB report that was mentioned at the meeting at the Martindale, and the objection from the owner of Jeffrey's Farm at that meeting that the AONB report had not been updated since their plan changed to exclude historic fields.</p> <p>St Stephen's Field</p> <p>The proposed site at St Stephen's Field seems like a bizarre option for the parish council to back. I often go down Hamsland and Challoners to get to the playground, or as part of a loop on a walk. I would be surprised if this is not the most densely populated part of the village. The roads are always lined with parked cars, and it's rare I don't see cars driving in and out of Hamsland when I walk by. It's busy. Proposing to add more houses down this cul-de-sac is laughable. Access is absolutely terrible, and the disruption to a large percentage of villagers would be significant, and permanent, not just during development. I can't think of a worse place in the village to try to add more housing, including Church Lane and the numerous reasons that make Church Lane a terrible development option too. Some incorrect assumptions were made that were pointed out during the meeting at the Martindale. Bonfire Lane is not an access point, although the consultant presenting seemed to believe it was. I also noted in that meeting that the traffic measurement was only taken next to St Stephen's church, when the junction of Lewes Road and Hamsland is quite obviously the spot any truly representative measurement of traffic flow should be taken from. This all seems wilfully misleading, as though a view has been taken that poorest part of the village is the perfect place to bury a problem like more housing, with no real thought given to the practical implications, or in this case the lack of them.</p> <p>There are rumours that self-interest is motivating some of the Parish Council to reject the Jeffrey's Farm option in favour of St Stephen's Field. If that is the case, then shame on you. If it is not the case, then I fail to understand how any objective observer could possibly see St Stephen's Field as a better option for this village than Jeffrey's Farm.</p>
077	001	Tim Rodway	Rodway Planning Consultancy	Fairfax Acquisitions Limited	Our submissions relate to our client's site 'Land south of Robyn's Barn, Birchgrove Road, Horsted Keynes' (also referred to as 'Land at Birchgrove Road '), which is identified in the District Council's

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					<p>SHELAA as site reference 781. The site is identified in the Parish Council's 'Site Appraisal for Possible Housing Development Allocations (April 2020)' as Site D.</p> <p>Background</p> <p>This is a land parcel that, on behalf of our clients, we have been actively promoting since 2016. The site has been subject to a number of planning applications, most recently an Outline application for 32 dwellings, comprising 90% affordable housing (Mid Sussex District Council reference: DM/19/4276), which was refused. This scheme is now subject to a Planning Appeal, which is due to be heard by Public Inquiry in March 2021. Due to the constraints that apply to the District of Mid Sussex as a whole, the need to increase housing numbers and provide for future development to meet the needs of the District will inevitably mean that land currently designated as countryside (i.e. located outside of the settlement boundaries) will need to be removed from this classification. The Local Plan and Neighbourhood Plans provides the mechanism for achieving this, in addition to allocating specific sites for future development. It is our case that it is in fact entirely necessary for the built up area boundary to be revised on the east side of Horsted Keynes to encompass our clients site in addition to that proposed to be allocated at adjacent 'Police House Field' (Site E), in order to ensure that a maintainable balance is drawn between the pressures to provide new housing, and protecting the countryside. This approach would be entirely consistent with the guidance contained in the NPPF.</p> <p>Assessment of Site Appraisal for Possible Housing Development Allocations (April 2020)</p> <p>The assessment scores the site poorly in respect of the High Weald AONB, but this is common for all the proposed sites. Indeed adjacent Police House Field (Site E), which is recommended for allocation (albeit in the District's Site Allocations DPD, and NOT the Neighbourhood Plan – see below) is assessed in the Site Appraisal document as having a <i>"High impact on AONB due to loss of medieval fields and development isolated from the village core, uncharacteristic of settlement pattern, if both northern and southern fields developed, and access obtained from Danehill Road. However, if access from Birchgrove Road and</i></p>

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					<p><i>development confined to northern field, then impact on the AONB would be moderate."</i></p> <p>The most recent proposals for Site D, which is now subject to a current planning appeal, positions the new housing to the north and west of the site, with access via Birchgrove Road also. Much of the promoted site would remain undeveloped, albeit with new landscaping added. Therefore we contend that the site should be at least similarly assessed as the adjacent site, which is supported for allocation by the Site Appraisal document.</p> <p>The conclusion contained in the Site Appraisal in respect of our site (D) states "<i>High impact on AONB due to loss of medieval fields and separation from the village, as it would take development beyond the strong boundary currently provided by Danehill Road. The site is very prominent in views from historic routeways."</i></p> <p>The impact on the AONB from development on this site has been assessed robustly by our client's professional Landscape Consultants – Hyland Edgar Driver (HED).</p> <p>The site is considered to be a landscape of good quality (rather than high), on account of detracting features including its location adjacent to Birchgrove Road and Danehill Lane, associated linear residential development and the urban edge of Horsted Keynes, which urbanises its otherwise rural character and reduces the sense of remoteness and tranquillity found elsewhere within the High Weald AONB.</p> <p>The topography rising to the north-east, east and south-east beyond the wooded valley surrounding Danehill Brook potentially provide some long distance views down to the site from the upper parts of the slope within the High Weald AONB. The thick vegetation on the lower parts of the slope and intervening dispersed hedgerow and trees is also likely to obscure views from this area. Potential visual receptors are likely to be limited to isolated properties/farmsteads and one or two PROW on the upper slopes of this area.</p> <p>Visibility from the south-west and west are likely to be curtailed by the existing vegetation and built form. Views are likely to be limited to short distance views from users along Birchgrove Road and Danehill Lane and properties overlooking the site. Views from the south are potentially limited by the existing vegetation</p>

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					<p>flanking Danehill Lane. There is likely to be some glimpsed short and middle distance visibility towards the site from Danehill Lane and the two properties along this lane. Views from the north are also potentially limited by the topography and intervening built form and vegetation. Views will be limited to short distance views from users of Birchgrove Road and the properties overlooking this area of the site.</p> <p>HED's assessment shows that although on a ridgeline, the site is visually well contained within the wider landscape on account of the surrounding vegetation, topography and limited exposure to visual receptors.</p> <p>The current Appeal scheme will preserve the rural and local character of the site allowing the existing landscape and adjacent built form to dictate the form, siting and scale of the development. Local characteristic features of the High Weald AONB have been conserved within the site including hedgerow lined field boundaries, tree planting, topography and sensitive views towards and from the site. The feature central tree lined hedgerow and open space will be retained to the north of the site and within the site, to preserve as much of the existing fieldscape as possible.</p> <p>It is proposed that development at this site is located adjacent to the settlement boundary, is set within generous and extensive grounds allowing for all significant vegetation and a large portion of open space to be retained within the site. New buildings will be a maximum of two storey, set back from the road in keeping with residences along Birchgrove Road. Dwelling locations have also been sensitively arranged to retain views across the site towards the countryside from properties on the opposite side of Birchgrove Road where possible.</p> <p>A wide verge with wildflower, hedge and tree planting is proposed along the western boundary of the site, creating a green buffer between Birchgrove Road and the development. This buffer will allow open space to be retained on the higher part of the slope in keeping with the extensive front gardens of properties on the opposite side of the road. A new footpath is proposed within this buffer that will separate pedestrian and vehicular access along this section of the road with new pedestrian connections towards Westall House and Horsted Keynes village. The footpath will</p>

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					<p>improve pedestrian accessibility towards Westall House, Horsted Keynes village and connections to nearby Public Rights Of Way. Additional native tree and hedgerow planting will be used to reinforce existing boundaries and woodland areas in keeping with the distinctive linear framework of hedgerows to field boundaries that are characteristic of the surrounding local High Weald AONB landscape.</p> <p>A new planted woodland buffer with a native shrub planting will be introduced along the eastern boundary of the site where it is currently open field. This buffer will consist of native tree and shrub planting matrix with individual semi mature specimens to assist with the physical and visual integration of the development into the landscape. The boundary will be reinforced by a new timber post and rail fence along this edge. Additional tree and hedgerow belts and tree groups will be proposed to run between the properties following the natural vegetation lines. Tree planting will comprise native individual specimens along hedgerows and individual ornamental specimens within property front gardens and grouped native specimens within rear gardens. The aim is to provide a well screened cohesive appearance that conserves the existing High Weald AONB landscape.</p> <p>Sustainable Urban Drainage systems (SUDs) have been considered within the scheme and will be incorporated within the woodland buffer along the eastern boundary. This buffer will also provide an ecological wildlife corridor for badgers to improve connectivity to existing areas of woodland and hedgerows.</p> <p>Care has been taken to preserve the character of the area allowing the existing landscape to dictate the form, siting and scale of the development. All significant boundary vegetation will be retained with unvegetated boundaries site enhanced with additional native tree and hedgerow planting. New planting provides an appropriate network of tree and hedgerow and be of a scale and form to echo surrounding tree and hedgerow lines and reinstate historic boundaries.</p> <p>Open space has been sensitively located and designed to maintain the existing fields structure and character of the site. It will provide a mosaic of biodiversity enhancements alongside the woodland buffer and retained existing tree and hedgerow planting.</p>

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					<p>With mitigation, the proposals will result in a residual localised but significant change to the existing landscape setting. However, the sensitive design of the architectural proposals will create a logical extension of built form to the village of Horsted Keynes. With the mitigation provided by the planting proposals, the end result is a visually screened development that sits well within the local and wider landscape.</p> <p>Development of the site would not lead to the setting of the site within the AONB being significantly adversely impacted upon, and the key characteristics of the AONB will be maintained. Therefore, the proposals will accord with Policy DP16 of the MSDP, in that the development would conserve the landscape and scenic beauty of this part of the High Weald AONB, whilst also protecting the local distinctiveness of the site.</p> <p>Aside from scoring poorly ('red') in terms of AONB impacts, Site D otherwise scores well, with the only criticism being in respect of sustainability credentials with the Appraisal stating, <i>"It is more distant from the school and the village centre than several other options, so making it more car dependent and less sustainable."</i> However, it is important to accept that the scheme now at Appeal for 32 units was not refused by MSDC for reasons of accessibility to services or the reliance of residents on private vehicles. As a consequence, the site should be considered to be sustainable.</p> <p>The site scores 'amber' in respect of Trees/TPO's. However, and as highlighted above, a scheme has been designed that would retain all important landscape features, and further planting would be proposed to enhance the landscape character of the site and its surroundings.</p> <p>The Appraisal states that the impact on the closest Listed building (Lucas Farm) would lead to <i>"less than substantial harm (low impact)"</i>, but is scored as 'green'. In relation to Conservation Area (which the site lies outside of), the Appraisal scores the site 'green', and states it is <i>"assessed as no impact"</i>. In respect of heritage assets, our position is that the position is that there is no harm resulting from development of Site D, and therefore paragraph 196 of the NPPF will not be engaged. The District Council have not raised it as a Reason for Refusal, although they state that there is 'less than substantial harm' and therefore paragraph 196 is engaged. However, the District Council have</p>

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					<p>clearly undertaken a balancing exercise and concluded that the level of harm is off-set by the benefits of development (not least the provision of much needed affordable housing), and consequently the District Council did not refuse Application DM/19/4276 on the grounds of heritage impacts. Therefore, and taking into account <u>Barnwell</u>, the Council's conclusion of the acceptability of development at Site D in heritage policy terms is agreed.</p> <p>MSDC Site Allocations DPD</p> <p>The Regulation 19 Submission Draft SA DPD was published for formal consultation in August and September 2020.</p> <p>Draft Policy SA10 (Housing) addresses how MSDC will meet the residual housing needs to meet the identified housing target for the District in the Plan period. Table 2.3 indicates an updated residual housing requirement (as at 2020/21) of 1,280 dwellings for the District in the remaining lifetime of the Plan (2020 – 2031). It identifies that the proposed new Site Allocations (Draft Policy SA11) will equate to 1,764 dwellings representing an over-supply to the housing requirement of +484 dwellings 2014 – 2031. It is important to recall that the District's housing target is expressed as a minimum level of delivery.</p> <p>For Horsted Keynes draft Policy SA10 identifies that it will, together with other Settlement Category 3 locations ('Medium Sized Villages'), need to deliver a minimum total of 2,200 dwellings over the plan period. To achieve this the policy identifies an updated minimum residual housing requirement of 371 dwellings of which 238 are to be allocated through the SA DPD.</p> <p>Draft Policy SA11 sets out additional housing allocations to meet the needs shown in draft Policy SA10. Two sites are proposed for allocation in Horsted Keynes totalling 55 additional dwellings (as a contribution to the 238 dwellings for Category 3 settlements) and that both sites will come forward in the 1 – 5 year period after adoption of the SA DPD. The two sites proposed are:</p> <ul style="list-style-type: none"> • Policy SA28 – Land South of the Old Police House, Birchgrove Road (25 dwellings); and • Policy SA29 – Land South of St Stephens Church, Hamsland (30 dwellings).

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					<p>It is important to note, that until the SA DPD is adopted, the two allocations for Horsted Keynes that are intended to meet the settlement's housing need remain in draft form and therefore little weight can be placed on housing delivery (including any affordable housing) that might eventually be delivered or the timing of such delivery from them. At the District level, even if both proposed sites were delivered with policy compliant housing schemes the total level of affordable housing provision for both would be only circa 16-17 dwellings at best (assuming a 30% on-site contribution on each site was viable).</p> <p>Review of the draft Neighbourhood Plan</p> <p>In paragraph 2.16 the draft Neighbourhood Plan identifies that Horsted Keynes is dominated by detached housing (4 and 5 bed properties in particular) and consequently a much lower proportion of 3 and particularly 2-bed properties, the Plan notes, in the same paragraph, that there is a potential mismatch between the supply of larger properties and the needs of households which are for smaller properties.</p> <p>Draft Policy HK1 (Built Up Area Boundary) allows for development proposals beyond the Built Up Area Boundary (BUAB) for inter alia: housing development proposal allocations in the Site Allocations DPD (sites SA28 and SA29); where development complies with Policy DP6 with a proposed development of fewer than 10 dwellings and contiguous with the BUAB; where development proposals comply with other policies in the Neighbourhood Plan particularly those relating to community-led housing (policy HK2), dwelling extensions (policy HK5), conserving local heritage (policy HK6), protection of the High Weald AONB (policy HK9) and the expansion of business premises (policy HK14).</p> <p>Draft Policy HK2 (Community-Led Housing) supports proposals for 100% community-led housing development on suitable sites within, or if less than 10 units, contiguous with the built up boundary of Horsted Keynes village subject to various criteria. Site D is very close to the built-up area boundary, and although comprising more than 10 units, the current proposals are policy compliant, due to comprising a Rural Exceptions Site (MSDC District Plan Policy 32 applies).</p> <p>In paragraph 5.4 the Neighbourhood Plan identifies that work on</p>

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					<p>the Neighbourhood Plan has: shown very strong support for new housing development which is specifically designed and maintained to meet local housing needs. This can help to build a more sustainable and balanced community, where people can find the accommodation they need in a place to which they have strong social or economic connections, on terms they can afford. The development of Site D with the current Appeal scheme, comprising 90% affordable units, would comply with this.</p> <p>Paragraph 2.17 references the Northern West Sussex Strategic Housing Market Assessment Update (2014) highlighting that <i>"affordability is a significant issue with over 44% of households in Mid Sussex District unable to rent or buy a property without assistance."</i></p> <p>With respect to affordable housing needs in Horsted Keynes parish, paragraph 2.18 states: <i>"Just taking evidence from the housing register [assumed to be the Mid Sussex District Housing Waiting List Register] shows that in January 2020, there was a total of 15 households on the register with a local connection, with of these having Horsted Keynes as their first choice. 11 of these households were seeking 1 bed dwellings, 3 were seeking 2 bed dwellings and 1 a 3 bed dwelling."</i></p> <p>At paragraph 2.19 the Plan notes that a Housing Needs Survey was conducted in spring 2019 and published in October 2019 which identified 24 households in housing need with one-bedroomed housing for rent being the most common housing need.</p> <p>The Vision for Horsted Keynes (paragraph 3.2) includes making homes available for all stages of life and circumstances. Neighbourhood Plan Objective 3 (paragraph 3.3) confirms the need to <i>"Meet Horsted Keynes local housing needs over the plan period with <u>emphasis on housing that addresses the needs of younger people and families</u> to help maintain the village age profile."</i> [our emphasis].</p> <p>The same paragraph continues identifying the particularly important point that the Housing Needs Survey identified affordable housing needs that were likely to be a minimum, stating: <i>"A Housing Needs Survey was carried out in the parish in spring 2019. The survey identified 24 households as being in</i></p>

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					<p><i>housing need, most of whom are single person households, requiring housing for rent. This level of need is likely to be a minimum, as the survey did not get a response from all households in the parish.” We therefore question the robustness of the survey, and its subsequent validity.</i></p> <p>Draft Policy HK3 (Dwelling Mix) sets out a preferred dwelling size mix for all residential developments (market and affordable) of over five dwellings. The emphasis is on 1-bed (2 person) and 2-bed (2 person) dwellings (40% of the overall total provision overall each respectively) with reduced emphasis on 3-bed (5 person) dwellings (20% of the total provision). We have no comments to make in this respect at the current time.</p> <p>Paragraphs 5.16 and 5.17 state that evidence from the local community (the Horsted Keynes Housing Need Survey, 2019) demonstrates a need for a greater number of smaller dwellings for first time buyers, young and growing families and older downsizing residents. Paragraph 5.16 states: <i>“This reflects the high proportion of single adult and adult couple households, who represent the vast bulk of those identified as being in housing need”</i>. Paragraph 5.17 continues, highlighting: <i>“This above evidence, combined with the evidence from the local community, collectively demonstrates that - as well as a need for smaller, particularly one-bed, properties for rent - there is a need for a greater number of smaller dwellings at an affordable price for first- time buyers, young and growing families and older residents wishing to downsize in Horsted Keynes. Indeed, the provision of a larger supply of smaller units may help to reduce the price and make entry-level housing more affordable in Horsted Keynes. This is reflected in Policies HK2 and HK3.”</i></p> <p>Section 9 of the Neighbourhood Plan is concerned with the allocation of development sites. Paragraph 9.4 notes that the District Council’s draft Site Allocations DPD proposes two sites for housing development in Horsted Keynes (SA28 and SA 29 as set out previously in this report) totalling 55 dwellings. Paragraph 9.6 confirms that the Neighbourhood Plan housing strategy is to rely on the MSDC Site Allocations SA28 and SA29 to meet its residual housing requirement. It also states that in the event of any shortfall the Neighbourhood Plan will consider whether any additional site allocation is necessary to meet the Policy DP6</p>

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					<p>strategic housing land supply requirement.</p> <p>It is disappointing to note that our site is not currently proposed to be allocated for residential development in the HNP. Instead the Plan relies on the emerging District Plan Site Allocations Development Plan Document to undertake the allocation of sites. The Site Appraisal states <i>"The housing land supply in the parish as at 31 December 2019 (73 dwellings) already exceeds the minimum of 69 dwellings required by District Plan policy DP6. This existing supply includes existing completions and commitments since 2014, a discounted yield from the planning permission granted for supported residential accommodation at Westall House, plus the allocations proposed by MSDC in their Site Allocations DPD at Police House Field and St Stephen's Church"</i>. At paragraph 9.8 the Neighbourhood Plan notes that the existing housing land supply is sufficient to meet the minimum requirement of 69 new dwellings up to 2031 and that this is likely to be supplemented by windfall sites which may include community-led housing schemes. The same paragraph finds that this would give additional flexibility if existing commitments are not built out or if any of the proposed allocations yield less than expected or are delayed.</p> <p>We have made representations to the District Council as to why we consider the DPD should allocate more sites for an increased level of housing in the District. We have also identified that the DPD does not seek to fairly distribute housing across the District, with just 15% set to be allocated in Category 3 settlements (of which Horsted Keynes is one). When taken together our position is that more housing should be sought to be allocated in Horsted Keynes Parish. Our Appeal submissions set out our position that there is a significant housing need locally, which is not being met and will not be met by the planned DPD allocations. The provision of 90% affordable housing, as set out in the current Appeal scheme will make a significant, meaningful contribution to local housing needs, and we are surprised that the Parish are not supportive of this. We consider that the Horsted Keynes Housing Needs Survey (April 2019) has significant limitations, which under-estimates the current levels of affordable housing need for the Parish, and makes no assessment of future affordable housing needs. The relevant Strategic Housing Market Assessment (SHMA)</p>

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					<p>and Housing and Economic Development Needs Assessment (HEDNA) reports prepared in the course of the drafting of the District Plan in Mid Sussex identify varying, but significant levels of affordable housing need over many years (up to 331 affordable houses needed across the district per annum).</p> <p>Table A (page 53 of the draft Neighbourhood Plan) updates the housing land supply position for the Parish as at 31st December 2019. It confirms that:</p> <ul style="list-style-type: none"> a) a total of 7 new dwellings were completed or are committed between April 2014 and December 2019; b) contributions from C2 residential institutions from completions and commitments at Westall House provide 11 dwellings; and c) the allocation of sites SA28 and SA29 in the SADPD will provide 55 dwellings. <p>It can be concluded that:</p> <ul style="list-style-type: none"> a) the housing requirements are set out in minima terms. It is likely that if the standard methodology were applied that Mid Sussex's housing demands would increase, and as would Horsted Keynes'. The Neighbourhood Plan provides an opportunity to supplement and 'future proof' the Parishes housing supply by making additional allocations to meet identified current and future needs – especially in the form of much needed affordable housing. b) with respect to affordable housing, it is evident that none of the existing completions or commitments set out in Table A (7 dwellings) have been of a sufficient size, subject to District Plan Policy DP31, to require on-site affordable housing contributions to be made; c) the contribution of 11 no. C2 residential institution dwellings, while providing for a specific older age cohort, will not provide open market housing or an on-site contribution towards affordable housing in Horsted Keynes that meets the scale or type of need identified; d) the allocations of SA28 and SA29 are, at the time of writing in an emerging draft Plan that remains subject to

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					<p>public consultation, public examination and therefore further scrutiny and testing of the deliverability of those sites prior to their development; and,</p> <p>e) the possible contribution to on-site affordable housing for Horsted Keynes arising from the proposed allocations SA28 and SA29 would be only circa 16-17 dwellings at best (assuming a 30% on-site contribution on each site was viable and deliverable), as noted previously in this section of the report.</p> <p>Evidently, in Horsted Keynes the actual on-site supply of new affordable housing has been 0 dwellings despite the District Plan and emerging Neighbourhood Plan identifying the clear need for such housing. The planned supply is likely to be a maximum of 17 dwellings at best (from the draft Site Allocations DPD with which the draft HKNP proposes to align) and, given the housing land supply and evident existing completions and commitments in recent years, could result in no new affordable dwellings provided in Horsted Keynes. This is confirmed by work undertaken by Chilmark Consulting for Fairfax in support of the Appeal for housing at Site D, where they conclude <i>"There is insufficient housing land proposed for allocation or sites with extant residential planning consents to meet affordable housing needs in Horsted Keynes. This means that even the level of affordable housing need (and the pressure for such housing to be available in the immediate/short term) identified would not be met."</i> (see Chilmark Consulting 'Affordable Housing Needs Statement', October 2020).</p> <p>Development of Site D, as currently proposed by 32 units (with 90% affordable housing) would make a significant contribution to meeting identified local affordable housing needs (see the Horsted Keynes Housing Needs Survey [2019] – although restricted in its surveying as it does identified local needs, but does not consider future needs or demand arising from elsewhere). We recommend therefore that the Neighbourhood Plan is revised with the allocation of Site D as a rural exception site, compliant with Mid Sussex District Plan policy DP32.</p> <p>Conclusions</p> <p>In light of all the above we contend that 'Site D' warrants a favourable assessment in terms of its landscape/AONB impact as</p>

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					<p>assessed in the Site Appraisal document.</p> <p>Further, we consider that the Neighbourhood Plan should be amended so as to include further site allocations (in addition to those presented in the emerging MSDC Site Allocations DPD). Specifically, we consider that 'Site D' – Land south of Robyn's Barn, Birchgrove Road - should be added to the Horsted Keynes Neighbourhood Plan as an additional site allocation for residential development now. This would demonstrate the Parish and District's commitment to boosting the supply of housing and meeting local housing needs.</p> <p>We put forward this site with the intention to provide high quality housing, including a very high percentage of affordable housing, in an area with an identified need. We have made it clear in the above and previous representations relating to this site that it is eminently available, sustainably located and can provide much needed new residential units within the short term.</p> <p>The Parish Council's proposed housing figures for the Plan period are considered to be insufficient to meet the needs of the local area, and the wider District requirements. Horsted Keynes is a sustainable location (Category 3 settlement) in the context of Mid Sussex District, and we consider that it should be aiming to provide an increased housing figure during the Plan period.</p> <p>The site my client has an interest in is relatively unconstrained, and a significant amount of work has been undertaken, and the conclusions of which clearly identify that the site is suitable for development.</p>
078	001	Planning Policy and Infrastructure Team	WSCC		<p><u>Horsted Keynes Neighbourhood Plan Regulation 14 – WSCC Services Officer Level Comments – December 2020</u></p> <p>Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan for Horsted Keynes.</p> <p>The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are</p>

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					<p>not already aware of, or conflicts are identified with its emerging or adopted policies.</p> <p>In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority.</p> <p>In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals, where applicable. These documents include the West Sussex Waste Local Plan, Joint Minerals Local Plan, West Sussex Transport Plan and the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account.</p> <p>Specific Comments</p> <p>1 Section 2 – Local Context</p> <p>This section refers to local infrastructure, but there is no reference to Public Rights of Way (PROW) and their importance in relation to sustainable transport, Active Travel and improved cohesion within the community.</p> <p>Para 2.21 – St Giles CofE Primary School has a capacity of 147 pupils rather than 146 as stated. It may be useful to refer to the <u>Planning School Places</u> document for the most up to date school figures.</p> <p>2 Policy HK1 – Location of New Development</p> <p>There is no reference to PROW and how these should be considered as part of any development in Horsted Keynes. This could be in the form of enhancing the existing network or creating new links to improve sustainable transport options in the locality.</p> <p>Policy HK17 – Cycleways and Footways</p>

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					The reference to improving pedestrian and cycle links is welcomed, but this should also refer to equestrian access. It is suggested the plan could also explore the option of Bridleway creation through development, whether by upgrading existing footpaths, or through creation of new Bridleways to help achieve sustainable transport objectives, reduce the reliance on private vehicles for short journeys and the tourism benefits this affords.
079	001	Harriet Richardson	Batcheller Monkhouse	Griffiths Family	<p>I write on behalf of the Griffiths Family owners of land at Jeffrey's Farm, Lewes Road, Horsted Keynes, RH17 7DY. The family have consistently promoted three land parcels in and around the farm through the Local Plan process and the last Neighbourhood Plan Process. The family have proactively engaged with the Parish Council and their appointed Planning Consultant, Lindsay Frost, for the review of the former Neighbourhood Plan which we understand led to the preparation of this new Reg 14 draft document.</p> <p>The sites at Jeffrey's Farm were assessed in the SHELAA which was reported on in September 2018 and have been assessed again in the Site Selection Paper 3 which is included in the evidence base section of the current submission version of the Site Allocations DPD. The three sites are identified in the Site Selection Paper 3 Proformas as:</p> <ul style="list-style-type: none"> • Site 68: Existing farm buildings at Jeffrey's Farm • Site 69: Land at Jeffrey's Farm (Fields to North of farm buildings) • Site 971: Land at Jeffrey's Farm (Fields to South of farm buildings) • Jeffrey's Farm Site Context and Planning History <p>Jeffrey's Farm is located to the west of Horsted Keynes, it is located within the High Weald AONB and is adjacent to the settlements existing development boundary, separated only by a</p>

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					<p>road. Site 68 was allocated in the previous draft Neighbourhood Plan for Horsted Keynes as being suitable for redevelopment of the farm buildings.</p> <p>Following the allocation of site 68 in the draft version of the former Neighbourhood Plan, an application was made for the residential development of site 68 for 5 houses (DM/19/0957). Unfortunately, the Neighbourhood Plan was subsequently withdrawn changing the policy context which partly resulted in the planning application being refused and dismissed at appeal.</p> <p>A significant change in circumstances since the previous representations is that Gleeson Strategic Land Ltd, have agreed terms with the landowners to enter into a Promotion Agreement across Sites 68 and 69. Gleeson Strategic Land Ltd has a proven track record of delivering high quality residential development within the Mid Sussex District and their commitment to these sites indicates an assurance of delivery.</p> <ul style="list-style-type: none"> • <u>Basic Conditions- Compliance with National Planning Policy and Local Planning Policy</u> <p>We understand that the new Reg 14 draft Neighbourhood Plan seeks to defer site allocations back to the Local Planning Authority. General conformity with the strategic policies in the Development Plan for the local area is therefore clear. However, the Mid Sussex Site Allocations Document is yet to be tested at examination and therefore the proposed allocations do not yet form part of the adopted Development Plan. The adopted Development Plan sets out a requirement for 69 units in Horsted Keynes over the Local Plan period. The emerging Site Allocations Document echoes this and has identified 2 sites for allocation. Jeffrey's Farm is not included as one of these two sites.</p> <p>The emerging Site Allocations DPD allocates two sites in Horsted Keynes to deliver 55 dwellings collectively. The Horsted Keynes Neighbourhood Plan bases its housing strategy on the above Site Allocations DPD. It is argued that as of 31 December 2019 the housing need is met by a combination of the two allocated sites, completions between 1 April 2014 and 31 December 2019 (55 dwellings) and commitments on 1 November 2019 (7 dwellings) and 20 units at a ratio of 1.8 of C2 residential institutions arising completions and commitments at Westall House. This ratio is based on paragraph 11 of the DCLG Housing Delivery Test</p>

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					<p>Measurement Rule Book, which is applied to all communal accommodation bar student accommodation. This provides 73 units in total which is argued to provide enough for the plan period.</p> <p>The Neighbourhood Plan therefore conforms with the adopted Development Plan and emerging Site Allocations document in terms of quantity of development.</p> <p>Mid Sussex District Council has made an adjustment to their housing need and have taken into account the under delivery occurring over the previous years. In their Annual Monitoring Report 2019 a 10% buffer was included to rectify the former under delivery and this has been applied over the remaining plan period. Based on the new calculation Mid Sussex District Council are still confident that they can demonstrate a 5 year housing land supply. There are however some concerns as to the likelihood of the Council being able to meet their increased housing targets, when they failed to meet their lower, former annual target. The annual housing target was backloaded to the end of the plan period, with a staggered increase in annual delivery, putting further pressure on increased delivery over the coming years. Therefore, when there are opportunities to provide additional housing on small, low impact, sustainable sites, such as Jeffrey's Farm, which can be delivered quickly, the Council should not rule them out purely on the basis that they can demonstrate a 5 year housing land supply. The concern in Mid Sussex is around housing delivery rather than land supply, and Jeffrey's Farm could be delivered swiftly.</p> <ul style="list-style-type: none"> • <u>Basic Conditions- Contribution to the achievement of sustainable development</u> <p>As part of the Neighbourhood Plan evidence base, an assessment was carried out to review the sustainability of the two allocation sites proposed, as well as a number of other sites in Horsted Keynes, including Jeffrey's Farm. The purpose of the assessment was to establish which sites were most sustainable.</p> <p>We are of the opinion that Jeffrey's Farm is in fact more sustainable than the sites that have been allocated, largely due to their proximity to the village, the existence of a well-established vehicular access and the physical presence of existing development/built form which could be replaced to provide an</p>

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					<p>enhancement to the AONB. In addition, the land is available for development immediately (subject to the appropriate planning consents), with a promotion agreement already in place. We are therefore of the opinion that Jeffrey's Farm should be included as an additional allocation.</p> <p>Below we set out the reasons we believe Jeffrey's Farm is a sustainable location for development.</p> <p>Area of Outstanding Natural Beauty</p> <p>Site 68 is a previously developed farm within the AONB, which has been acknowledged in the Horsted Keynes Neighbourhood Plan Site Appraisal for housing development allocations (2020) as having low impact on the AONB if sensitively developed, due to the relatively secluded nature and the generally poor condition of the existing development. The site is not constrained by listed buildings, or land designations beyond the AONB. Both sites allocated in the emerging Site Allocations Local Plan are also in the AONB and are in much more exposed locations, containing no existing built form and therefore no opportunities to provide any visual enhancement.</p> <p>Site 68 was found to have a low impact on the AONB, unlike the proposed allocation sites. Sites 69 & 971 are detailed as having a high impact on the AONB and being out of character with the settlement pattern of Horsted Keynes. Site 971 is within a cluster of existing development, with the farm buildings to the north of the site, and to the north-east/east of the site lies residential development. The site is well screened by mature trees which could be fully preserved in any development and would provide established natural screening of the site from all directions. This is a contained site that would have little visual impact on the AONB if developed. Site 69 also benefits from the established screening with mature hedging of substantial height on all boundaries. The site also benefits from being part of a modern field pattern, which is of lower value within the AONB than the medieval field patterns demonstrated in the proposed allocation sites elsewhere in Horsted Keynes.</p> <p>Access</p> <p>Site 68 achieved a positive assessment, except for perceived issues about the means of access related to visibility and a conflict with other junctions onto Sugar Lane. We do not however agree</p>

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					<p>with the assessment that these issues are insurmountable, nor would they have a significant impact on the AONB. The Griffiths family own the existing track and the adjoining land, including the field adjoining Sugar Lane, providing the land necessary to widen the access and improve the visibility splay. This would necessitate the loss of some trees as highlighted in the assessment, however the pine trees to the north of the existing access are in a poor condition and there is ample room for new native planting to offset any loss of existing vegetation. In addition, a large sycamore just to the north of the farm track, that was considered to be an obstacle to suitable visibility according to the assessment, has also been removed due to dry rot, increasing the existing visibility and the ability to provide better access. A plan showing the proposed access improvement has been included in previous representations to Mid Sussex DPD. Notwithstanding this, a safe alternative access can also be provided to both sites 68 and 69 within the Griffiths Family land ownership as has been proposed in two prior planning applications on the sites (DM/19/0957 and DM/16/3974). On both occasions this alternative access was supported by West Sussex County Council as the Highway Authority.</p> <p>Site 971 is also perceived to suffer the same access issues as site 68. As highlighted above, access to the site can be improved to provide adequate access without requiring any third party land. The main amenities identified within the Neighbourhood Plan area including the village shop, school, church and pubs are all within 1km of the site and easily within walking distance (see figure 1). The main heart of the village which consists of Horsted Keynes General Store, The Green Man pub, The Crown pub and The Horsted Club, as well as the Lewes Road bus stop are all between 0.7km and 0.8km from the existing development at Jeffrey's Farm. This is very similar to Site 184 , proximity to the village as which whilst appearing closer is hampered by the existing settlement pattern that does not provide a direct route to the village centre – yet this site has been allocated. The assessment of site 971 shows the village centre to be less than a 10 minute walk which is an acceptable walk time to encourage pedestrian access rather than reliance on a car. In terms of access to services outside of the village, site 971 is no less connected than the proposed allocations. In fact, the Neighbourhood Plan</p>

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					<p>specifically sets out that the entire village is largely reliant on the private car due to the limited services in the village and the relatively limited, but vitally important and well used bus service. Therefore, to rule out a site on the grounds it would be heavily car reliant, when it is in easy walking distance to the existing village services, contradicts the findings of the Neighbourhood Plan which shows that most residents rely on their cars daily to access jobs and services, regardless of their proximity to the heart of the village.</p> <p>Settlement Pattern</p> <p>In terms of settlement pattern, Horsted Keynes development has shown a general western expansion of the village with developments Jefferies, Boxes Lane and Rixons being in close proximity to site 69. Development of the site would be in keeping with this western expansion. The proposed density of development at just 8.8 dwellings per hectare would also be in keeping with the wider low density development pattern of the village and provides scope to introduce additional landscaping to increase biodiversity and aid in the screening of the development. However, a higher density could also be provided to allow for smaller, more affordable units, which would accord with the housing need set out in the Neighbourhood Plan.</p> <p>Draft allocation SA29 is located to the south of Horsted Keynes and represents a significant intrusion into the open countryside, with the land lying to the rear of the properties on Hamsland which provides a clear southern boundary to the existing settlement. With the existing development of Horsted Keynes running largely east to west, the site will fundamentally change the axis of development of the settlement in a southerly direction. This is likely to continue to form the pattern of development in the future, as the sites jut out into the open countryside. The change to the development boundary in this location is therefore likely to unlock further development land to the south east and west of the site which has potential to fundamentally change the character of the village.</p> <p>Access to site SA29 is highly constrained with mature trees and an electric substation to the west of the access, and the limited scope for widening is restricted by the grounds of St Stephens Church to the east. In contrast, all parcels of land at Jeffrey's</p>

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					<p>Farm can be safely accessed with a number of options available across land solely owned by the landowner. There therefore appears to be a lack of consistency on the way the various sites are being assessed for suitability.</p> <p>A final constraint presented by site SA29 is its proximity to the Horsted Keynes Conservation Area and Wyatts, a Grade II listed property, south east of the site. It is likely that any development on the site will be in the setting of both heritage assets, a fact identified during the site appraisal. However, the impact on these heritage assets is later dismissed, despite the fact that the site is clearly visible from both heritage assets. In contrast, while site 69 is close to two heritage assets, Ludwell Grange and Box Farm, it is entirely screened from these assets and serves no visual link to their setting. It can therefore be argued that site 69 actually presents a far reduced impact on the heritage assets of Horsted Keynes than the proposed allocation at site SA29. Furthermore, sites 68 and 971 are not considered to be within the setting of heritage asset.</p> <p>The other draft allocation, referred to as SA28, is better located within the existing pattern of development, but will lead to a loss of a medieval field system within the AONB. Whilst the allocation has been limited to just the northern half of the wider field system, it will still undoubtedly have an impact on the AONB, and a risk of development spread to the fields to the south due to the built up area boundary change. This is further exaggerated by the lack of existing built form on this site. The site is also directly opposite to Lucas Farm which is a listed building. The boundary between the site and the farm is formed of thin foliage in parts and low hedging elsewhere, making the site entirely visible to the listed building. The site appraisal acknowledges this fact but still concludes that there would be a low heritage impact, despite there being no justification for this conclusion. Additionally, the site's western boundary directly abuts the Conservation Area, however once again it is deemed low impact with no justification. Again, there therefore appears to be an inconsistency in the way the sites have been assessed for suitability for development and it is clear that SA28 will have a significant impact on several heritage assets if built out.</p> <p>Deliverability</p>

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					<p>In the previous planning applications made for land at Jeffrey's Farm, development of varying densities was considered. The original scheme sought to provide a higher density development, providing smaller residential units and some affordable housing. Both of these elements accord with the housing needs set out in the Neighbourhood Plan which identifies a need for smaller units as starter homes or for retired residents who may be looking to downsize. This was combined with some community open space, which again accords with the aspirations for the Neighbourhood Plan - yet the application was refused.</p> <p>Sites 68 and 69 are not only sustainable, but also deliverable, now that terms have been agreed with established land promoter Gleeson Strategic Land Ltd. Gleeson has an excellent track record in delivering small, medium and large-scale housing sites across the country, including land and sites within Mid Sussex District. Gleeson are experienced land promoters who have local knowledge gained through working closely with Mid Sussex District Council to bring forward other development sites within the District. With Gleeson's forthcoming involvement, the deliverability of the land at Jeffrey's Farm at sites 68 and 69 is assured.</p> <p>The former draft Neighbourhood Plan found land at Jeffrey's Farm to be suitable for development within the existing footprint of farm buildings. The site, and adjoining land parcels at sites 69 and 971 are available for development, as evidenced by the previous planning application and the emerging promotion agreement with Gleeson Strategic Land Ltd for parcels 68 and 69. There is therefore no clear planning justification for the site to now be excluded from the allocations for Horsted Keynes. It is recognised that the Council considers the current housing need to be met by the sites proposed in the emerging Site Allocations DPD and that the previous under delivery of housing during the plan period is adequately resolved. However, given the identified need in the Neighbourhood Plan for smaller more affordable units, that need to be delivered quickly and in a location that is within walking distance of the limited, but vital services provided within the village, it appears short sighted to not consider additional, sustainable and deliverable sites adjoining the settlement boundary, particularly where there is clear evidence that they</p>

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					<p>could be delivered in the immediate to short term. The two sites proposed for development in the draft Site Allocations DPD are yet to make planning applications. In light of the under delivery of housing across the Local Plan period to date, this raises some concern about the level of back loading of housing delivery in Mid Sussex District as a whole.</p> <p>In addition, there are concerns raised in the draft Neighbourhood Plan about the long-term viability of the existing services in the village. The village has an ageing population comprising of largely retired residents with limited opportunity to actively contribute to the local economy and assist in supporting the longevity of the remaining local services in the village. Additional housing in the village, on sustainable sites would bring the opportunity of greater support for local businesses and services. Furthermore, the provision of smaller units would allow existing older residents to downsize, freeing up larger dwellings for families to move to the area. The smaller, more affordable units could also provide starter homes for the younger generation, which would again ensure that the village remains vibrant and relatively well serviced in the future for both existing and new residents.</p> <p>To conclude, we would therefore argue that there are a number of inconsistencies in the way the proposed development sites have been assessed at both Neighbourhood Plan and Local Plan level. Some elements of the assessment of the Jeffrey's Farm sites are based on misinformation, particularly regarding access and proximity to village services. Land at Jeffrey's Farm is sustainable, suitable for development and deliverable in the short term and therefore should be considered for development within the Neighbourhood Plan to help meet the immediate need for increased housing in the village. This will assist in encouraging downsizing in the village as well as introducing new families to the Parish, which will assist in supporting the long term viability of the remaining services in the village.</p>
080	001	Cllr Andrew MacNaughton	MSDC		<p>Thank you for consulting Mid Sussex District Council on the Regulation 14 (Pre-submission) Consultation for the Horsted Keynes Neighbourhood Plan. Mid Sussex District Council welcomes Neighbourhood Plans and recognises the potential benefits they provide to local communities.</p> <p>The Council provided informal comments on a draft version of the</p>

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					<p>Plan earlier this year. The Council is pleased to see that many of our comments have been taken into account in the Plan that is now out for consultation.</p> <p>However, there are still some outstanding issues which the Council suggests are addressed to help the implementation of the Neighbourhood Plan and ensure that it meets the Basic Conditions test and therefore is successful at Examination. These are set out below:</p> <p><u>Policy HK1: Location of New Development</u></p> <p>Paragraph 3 refers to 'acceptable impact on the landscape'. We would recommend stronger wording here to avoid a loose interpretation of the policy such as "does not detract from", "does not cause significant harm to" or "does not cause detriment to".</p> <p>The Mid Sussex Design Guide was recently adopted by the Council, and you may want to include a reference to this Supplementary Planning Document within your plan.</p> <p><u>Policy HK4: Maintaining Local Character and Good Quality Design & Policy HK12: Sustainable Drainage System Design and Management</u></p> <p>These policies require all development to adopt the principle of Sustainable Urban Drainage Systems. This may not be possible or practical, particularly on household extensions for example.</p> <p>Policy DP41 of the District Plan introduced a threshold (development of 10 dwellings or more) with regards to SuDS and a departure from strategic policy would need to be appropriately justified, including through viability evidence.</p> <p><u>Policy HK 5: Infill Development and Residential Extensions</u></p> <p>The policy refers to 'residential extensions' which could be understood as extension to the village. The use of 'household extension' would provide additional clarity in this respect.</p> <p>The second bullet point refers to important views out of the village. It would be useful to define those.</p> <p><u>Policy HK9: The High Weld Area of Outstanding Natural Beauty</u></p> <p>The first sentence of this policy is the same as the policy DP16 of the District Plan which suggests that this policy may not be needed. The second part of the policy lists criteria that all development must demonstrate which we believe may be too onerous and unreasonable with challenging concepts to apply to</p>

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					<p>all proposals.</p> <p>The Neighbourhood Plan Roadmap prepared by Locality stresses the importance to consider the adequacy of existing policies as part of the neighbourhood planning process and points out that “<i>If existing policy is robust and relevant to the neighbourhood area in question, then they may be no need for a neighbourhood plan, or a simpler more selective neighbourhood plan could be produced, otherwise the neighbourhood plan risks repeating already existing policy</i>”. Experience has shown that policies that repeat or duplicate existing policies are generally deleted at the examination stage by the Examiner to avoid confusion or potential misinterpretation, unless they are genuinely locally specific to the plan area.</p> <p><u>Policy HK17: Cycleways and Footways</u></p> <p>This policy is quite prescriptive by requirement ‘sufficient width to accommodate at least two persons walking abreast’. We would advise engaging with West Sussex County Council, the highway authority, on this matter to ensure that this accord with the standards they are looking to implement.</p> <p><u>Other comments</u></p> <p>The Council suggests that you ensure that cross-references within policies are accurate. In addition, references to the Site Allocations DPD need to be updated throughout the document.</p> <p>The inclusion of a monitoring framework is welcomed. We would recommend approaching the policy team to discuss and agree what you would like to monitor, how these elements fit with the policies within the plan and identify indicators to that the Council can use to report on the implementation of the plan within its Authority Monitoring Report.</p> <p>Mid Sussex District Council trusts these comments are helpful and believe that only limited amendments will be needed to meet the Basic Conditions test before progressing the Neighbourhood Plan to the next stage.</p>
081	001	Celia Vince	Resident		<p>I would like to make the following comments please:</p> <ol style="list-style-type: none"> 1. First of all I appreciate what an extraordinarily long slog it has been to get to this stage and how difficult it has been at times. I know from first hand that those working on the Plan have nothing but the best interests of the village at heart and should be

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					<p>warmly congratulated for their hard work and commitment.</p> <p>2. I think the Plan is an excellent document, clearly written and well explained.</p> <p>3. I fully support policies HK2 - HK17. These are all very worthwhile policies in their own right and should help the village take some measure of control over future development and other changes.</p> <p>4. I have more trouble with policy HK1. The land at Police House Field and St Stephens Church may be the two "least worst" sites in the village but that does not mean they are suitable for large developments. In Haywards Heath developments of 25 or 30 houses may not seem large but here in Horsted Keynes they will make a huge impact, materially changing the character of the village. In Hamsland I believe the grass verges may have to be removed to accommodate extra traffic which would urbanise this part of the village.</p> <p>5. Nevertheless I understand the approach being taken in policy HK1 which is simply to rely on MSDC's Site Allocations SA28 and SA29 to achieve our target of 69 new dwellings. Since those developments are what we will most likely get if we have no Plan perhaps it makes sense just to reflect what is going to happen anyway. Policy HK1 does provide for other developments as well as the MSDC's Site Allocations and to that extent I support it. My best hope is that other smaller developments come along during the plan period and help towards the new dwellings target, thus reducing the scale of development needed on sites SA28 and SA29.</p> <p>6. On balance I expect to support the Plan at referendum although that may change. The excellent policies concerning Housing and Design of Development, Environment and Green Space, Business and Employment, Transport should help us challenge inappropriate development proposals. We are therefore better off with them than without them.</p>
082	001	Alison Nicholson	Resident		<p>Having read the Draft Neighbourhood Plan (DNP) and supporting documents in their entirety I advise that I would not vote for this DNP plan in a referendum and do not support the proposed site allocations for housing developments and development plans.</p> <p>The choice of sites to include in the DNP has been flawed for</p>

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					<p>several years since the Jefferies Farm sites were removed. The Jefferies Farm sites were clearly favoured by the village community due to their ease of access and lack of impact on the village during construction phase and thereafter with general resident traffic, and yet the Parish Council (PC) committee at the time, chose to remove these sites from the selection process due in part to reasons which subsequently were found to be incorrect regarding an erroneous covenant. Moreover the PC has not supported the owner of Jefferies farm in correcting this error in MSDC documentation which would prove that access to this site is not restricted at all and that it is therefore suitable for development. This site should be included in the DNP as a site for housing development.</p> <p>The PC has not sought to equalise the AONB assessment of sites across the village which currently show that the Jefferies farm sites have a higher AONB rating than the Police Field and St Stephens field. Given their proximity to each other, all should either be High or all should be low and thus either all or none suitable for housing development.</p> <p>The PC has not used the same appraisal of the Built Up Area Boundary (BUAB) on all the sites. Why is it ok to breach the BUAB behind the properties on Hamsland, but not OK to breach the BUAB along Sugar Lane? Either the village has a BUAB or it does not . In fact the views from the St Stephens field across to the South Downs are much more far reaching than those afforded by the secluded site at Jefferies Farm. Both sites will need protection to avoid settlement spread. However the proposed layout of the development at St Stephens field already shows a spur access which clearly looks as though it has been left to connect to the council field alongside St Stephens field. This spur would serve no other purpose, and indeed would suit MSDC very nicely if this were developed as it provides the access to their council field, and then the Constance Field recreation ground and furthermore the council owned fields to the south that border the Constance woods. So potentially this site has a much greater development spread potential than Jefferies farm which is not surrounded by MSDC owned land and could be more easily restricted against development spread. So in terms of minimising the impact of new development on the boundaries and historic shape of Horsted</p>

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					<p>Keynes, Jefferies farm sites are the least risky, and the proposed St Stephens field the highest risk. And yet the PC effectively gave control of the St Stephens field site to MSDC when they allowed it to go forward for consideration on the site allocation list of MSDC. And of course for the obvious reasons sated above, MSDC will be pleased to see this site included on the planning register.</p> <p>The plan does not reflect the views of residents. The Parish Council have not taken on board the views of over 300 residents who submitted their opposition to the St Stephens field site for a wide variety of credible reasons, including:</p> <ul style="list-style-type: none"> - The development of St Stephens field will damage the landscape through the destruction of a considerable number of ancient oaks on the access road and other trees and hedgerows, and damaging wildlife habitat. Developing this site is in conflict with note 6.11 in the DNP to conserve the landscape and limit the scale of development. Policy HK9 states that it is to conserve and enhance the ecology of fields trees and hedgerows. The very destruction of these to enable the development of St Stephens field shows that this site proposed by Parish Council CONTRADICTS their own DNP policy, and therefore should be removed and replaced with a less destructive site such as Jefferies Farm site. 2. - The Hamsland Challoners estate is at its maximum size and should not be extended. It was built as a cul de sac and this will change the nature of the original planning intention for this locality. 3Ii- It will increase the pressure on an already busy and congested road (Hamsland) which is effectively reduced to one lane due to roadside parking. Putting extra traffic down this road that a 30+ dwelling development would create makes no sense and would be hugely disruptive to existing residents. If the site were further extended across to MSDC owned land, with no other access route, the traffic through Hamsland would more than double or even triple, making Hamsland a dangerous congestion zone. The PC have not provided sufficient thought to parking and road safety for this site particularly for the potential long term effects of the very highly likely extended development of this site. <p>Looking to the Police House Field site, when it was originally put forward in the village plan in 2015 it was for a much smaller development and did not wrap around the existing houses on</p>

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					<p>Birch Grove Road and to the south. It was a small defined plot and that is why residents voted for its inclusion. The enlarged plot breaches the BUAB in a much more intrusive manner especially to those existing village residents living on Birchgrove, Bonfire and Wyatts Lanes. Having a larger development in this location will also generate more traffic through the narrow road and bend from the village green to Birch Grove Road, a stretch of road which is already dangerous and congested especially with the turn into Bonfire Lane. When lorries and the service Bus travel around this bend, oncoming traffic often has to mount the pavement due to parked cars on the other side of the road. This is dangerous for pedestrians and regularly causes bottlenecks in busy periods such as school run time. The Jefferies farm site has a much safer point of access onto Sugar Lane and would lead to lower impact of vehicle traffic across the village green and importantly the school crossing zone at the top of Burns Hill. The inclusion of the Jefferies Farm Sites would therefore enhance and support the DNP by providing housing with low impact on the village in terms of traffic, congestion, parking and access safety. This calls into question the whole rationale once again of the site allocation decision making process and criteria in relation to the policies of the DNP. They should match not contradict.</p> <p>The Village Plan is also flawed in that the "local green spaces" it intends to "conserve and enhance" does not include Constance Wood Field which is an important recreation area for this part of the village and should be on that list. (See DNP paragraph 6.9 and Policy HK7) . I would ask the PC to include Constance Recreation Field into all its paragraphs referencing recreational spaces. The casual reference in the DNP to another recreational area used by some residents on the edge of the village, is not acceptable. Indeed it does nothing other than reinforce the widely held concern that this recreation ground will be developed and that the Parish Council are already aware that this will become a reality if St Stephens field is approved; and so to facilitate this, the PC are already conveniently excluding this Recreation Ground from the list of protected recreational sites in the DNP. This is a contradiction on the DNP by not protecting ALL the residents recreational spaces. This should be corrected on the final NP prior to submission to MSDC.</p>

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					<p>The recent historic settlement pattern development of Horsted Keynes can be seen as a distinct series of small estate cul-de-sac developments branching off the 3 main roads through the village, such as Rixons, Rixons Orchard, Cheeleys, Jefferies, Lucas, and Hamsland/Challoners. The Police Field and Jefferies Farm sites would continue this pattern of small developments off the main roads. The St Stephens Field Site contradicts this pattern as it is an expansion of the largest but already congested small estate in the village and would produce a large estate of dense population completely out of character with the style and form of the rest of Horsted Keynes. It would not enhance or complement the village and would change the settlement pattern of the village seen through history, which for such a beautiful and historic village where so much care has been taken in previous generations to develop housing in a contained and sympathetic manner, would be a great shame, and a poor testament to the current Parish Council.</p> <p>Clearly a huge amount of work has been put into writing up the DNP and for that the current members of the Parish Council responsible for this work should be commended. However there are serious flaws in the decision making behind the DNP, both recent and historic, that require impartial reassessment, critical examination and correction. As a result it is my opinion that the DNP is weak due to the policy contradictions and omissions within it, it does not represent the views of the majority of the Village and is not in the village's best interests. Therefore I cannot support it in its current draft version.</p> <p>I would also ask that any revised version following this village consultation, be made publicly available prior to submission to MSDC.</p>
083	001	Chris Johnson	Avison Young	National Grid	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the</p>

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					high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.
085	001	Sarah Fordham	Rappleys	Horsted Keynes LLP	<p>On behalf of our client, Horsted Keynes LLP (HKLLP), please find enclosed our representations to the draft Horsted Keynes Neighbourhood Development Plan (HKNDP) Consultation. These comments are made in the context of the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).</p> <p>Section 3: Vision and Objectives</p> <p>The overarching Vision for Horsted Keynes to have a thriving local economy with sufficient services and facilities to meet local needs is supported, as is the ambition for the village to have homes that are available for all stages of life and circumstances. To achieve this Vision, it is important that the Parish embraces the opportunities made available through the development of new homes to help sustain local services and facilities for the benefit of existing and future residents. Recognition should, therefore, be given in Section 3 to the important role that new development will play in supporting and enhancing the local services and facilities through increased footfall and expenditure.</p> <p>A positive and proactive approach to new development in and around the village will also help the Parish achieve the objectives set out in paragraph 3.3, notably to support local business, to meet housing need, and to ensure that there is sufficient accommodation for all age groups. As stated in paragraph 78 of the National Planning Policy Framework (NPPF), to promote sustainable development in rural areas, housing should be located</p>

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					<p>where it will enhance or maintain the vitality of rural communities. Planning policies should, therefore, identify opportunities for villages to grow and thrive, especially where this will support local services.</p> <p>The comments set out in these representations are intended to support the Parish in achieving these objectives.</p> <p>Policy HK1: Location of Development and the Built-Up Area Boundary</p> <p>Section 4 of the HKNDP seeks to set the scene for the built-up area of the village, including the principles informing the location of future development. It is noted that the village is located within an Area of Outstanding Natural Beauty (AONB); however, the description provided in paragraphs 4.1 to 4.4 is not entirely consistent with the policy approach set out in the National Planning Policy Framework (NPPF). While national planning policy affords 'great weight' to 'conserving and enhancing landscape and scenic beauty in AONBs', it is not a policy provision to prevent 'unrestricted sprawl of development into the countryside', which is instead akin to the wording for Green Belt policy. It is therefore recommended that this wording as set out in paragraph 4.1 is revisited. Indeed, the supporting text to Policy HK1 should acknowledge that there may be circumstances in which 'major' development in the AONB is justified having regard to exceptional circumstances that exist and where it can be demonstrated that the development is in the public interest. In accordance with paragraph 172 of the NPPF, when determining applications for major developments in the AONB consideration should be given to:</p> <ul style="list-style-type: none"> • 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; • the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. <p>For the reasons described in these representations, the above considerations are of pertinence to development at Horsted</p>

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					<p>Keynes and should, therefore, be acknowledged within both the wording of Policy HK1 and the supporting text.</p> <p>Policy HK2: Community-led Housing</p> <p>Draft Policy HK2 refers to 'community-led' housing development to meet a 'specific identified need'. The type of housing identified in Draft Policy HK2 (shared ownership, affordable rent, social rent) all sit within the NPPF definition of affordable housing. It is unclear, therefore, if the policy is intended to deliver only housing that falls within the NPPF definition of affordable housing, in which case it would be more akin to 'rural exception sites', which are permitted under Policy DP32 of the adopted Local Plan.</p> <p>To be effective, the policy wording should be reviewed to ensure that it can successfully deliver the housing that is needed in the local community. For example, paragraph 5.3 of the HKNDP sets out the desire to reduce the need for local people to move away from the area. The delivery of 'rural exception' type housing (affordable housing), while meeting a local need, is not always aligned to the objective of providing new homes for all age groups and demographics. Indeed, the provision of lower cost market housing and improvements to the diversity of housing available are often crucial to meet this need.</p> <p>In order to provide homes for all members of the community it is important that the policy is sufficiently flexible to enable a diverse mix of new homes to be delivered. In this regard, the policy should not be limited to only 'community-led' development proposals. Instead the policy should be worded positively to encourage development proposals to come forward to meet local housing need, informed by an appropriate, robust, and up to date evidence base. Any policy that limits or constrains opportunities to deliver a variety of housing in the village will not offer meaningful solutions to the HKNDP Vision and Objectives. Proactive engagement with all developers and landowners looking to bring forward development would help to shape the type of development to be delivered in the Parish to meet local objectives.</p> <p>It is also important to recognise that the delivery of new affordable homes is often necessarily linked to provision of market homes to ensure that development is viable and deliverable. Indeed, the NPPF definition of</p>

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					<p>'exception sites' recognises that 'A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding'.</p> <p>Policy HK11: Low Carbon Design and Renewable Energy The policy requirement to deliver 'carbon neutral' or 'near to carbon neutral' development is not in general conformity with Policy DP39 of the adopted Local Plan. Consideration must be given to the feasibility and deliverability of such measures, particularly with regard to development viability.</p> <p>It should also be recognised that energy efficiency standards will soon be set by the Government's Future Homes Standard (Part L of the 2020 Building Regulations). The Government's Future Homes Standard consultation document (October 2019) stated that energy standards required by Part L of the 2020 Building Regulations and other provisions within the Future Homes Standard mean there would be no purpose to local authorities using planning policies to achieve the same outcome. Draft Policy HK11 should, therefore, be removed from the HKNDP.</p> <p>Policy HK14: Commercial premises While HKLLP has no specific comments to make on Draft Policy HK14, recognition should be given within the supporting text to the important role that new housing development will play in supporting the local economic aspirations and objectives. Increasing the amount and choice of homes available in the local area alongside expansion of employment opportunities will ensure that sustainable development objectives can be met – i.e. by allowing a greater degree of choice for people to live and work in the same area.</p> <p>Section 9: Site Allocations It appears that the decision has been taken to not allocate any land for housing in the HKNDP, instead relying on the site allocations contained within the emerging Mid Sussex Site Allocations Development Plan Document (SADPD). For the reasons summarised below, the HKNDP should be allocating sites for housing. Reliance cannot be placed on the SADPD draft allocations at this time and the decision to discount any further</p>

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					<p>site allocations in the HKNDP is not in the interests of achieving sustainable development.</p> <p>It should be recognised from the outset that the SADPD has not yet been submitted for Examination and thus the draft allocations have not examined a Local Plan Inspector. The degree of reliance that can be placed on these site allocations is, therefore, diminished until such time that they have undergone proper scrutiny.</p> <p>Notwithstanding the status of the emerging draft allocations in the SADPD, there are also a number of compelling reasons to allocate further site allocations to exceed the minimum housing requirement. The adopted Local Plan requirement of 69 homes for Horsted Keynes is a minimum housing requirement. As matters stand the HKNDP is suggesting that 73 homes will be delivered in the village in the plan period to 2031, which includes the two draft SADPD site allocations. This leaves very little margin in the event that housing delivery slips or the number of units reduce owing to, for example, site constraints. Consistent with paragraph 11 of the NPPF (the presumption in favour of sustainable development) policies should be sufficiently flexible to adapt to rapid change. Therefore, a greater degree of flexibility should be 'baked in' to the HKNDP to ensure that the minimum housing requirement can be met and, indeed exceeded.</p> <p>The HKNDP Vision is to have a thriving local economy with sufficient services and facilities to meet local needs. The vision also seeks to ensure that the village has homes that are available for all stages of life and circumstances. As already set out in these representations, to achieve this vision it follows that there should be a sufficient critical mass in population to sustain local services, facilities and businesses. Greater variety in the availability of different types of homes (both market and affordable) will also be crucial to ensure that the housing stock meets the different needs of the community. Both of these factors support the case for more housing in the Parish.</p> <p>Moreover, of relevance to settlements within Mid Sussex District is the uplift in housing need arising from the Government's standard methodology. Under the Government's current standard methodology (paragraph 60 of the NPPF) housing need in the District increases by at least 14%. This need increases even</p>

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					<p>further with a 25% uplift when having regard to the draft revised standard methodology calculation, which was subject to consultation earlier this year¹. It is already clear from the Housing Delivery Test Measurement (2020) for Mid Sussex that housing delivery in the District is falling short of the annual Local Plan Housing Requirement and this is reflected again within the Council's Housing Land Supply Position Statement (July 2019). The shortfall in delivery will be exacerbated by any increase in the baseline annual figure: From 2023, in accordance with the NPPF (paragraph 73), this figure will be calculated using the standard methodology². There is currently no timetable for the review of the Local Plan strategic policies. Therefore, given the plan period of the HKNDP (to 2031) it is strongly recommended that the Parish give further consideration to identifying further site allocations now to respond proactively to the increased local need identified by the Government's calculations.</p> <p>Land west of Church Lane (HKNP008)</p> <p>HKLLP controls land to the rear of Peacocks, Church Lane. It has been assessed within the HKNDP Site Appraisal evidence base document³ under 'Site A'. A planning appeal for 9 homes will be heard by the Planning Inspectorate at an informal hearing in January 2020. For the reasons summarised below, contrary to the conclusions reached in the Site Appraisal document, the site is suitable for allocation in the HKNDP. The following updates to the appraisal for Site A should be made:</p> <ul style="list-style-type: none"> • The site is available for development with flexibility in the amount of new homes that can be delivered. <hr/> <ul style="list-style-type: none"> • Contrary to the HKNDP site appraisal assessment, the detailed landscape appraisal submitted as part of the planning application found that the proposed development does not present an unacceptable impact on the AONB. • The site is of sufficient scale such that development can respond sensitively to the Horsted Keynes

1 MHCLG, Changes to the current planning system consultation.

2 unless the Council has reviewed and updated its strategic policies.

3 Site Appraisal for Possible Housing Development Allocations – April 2020

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					<p>Conservation Area and nearby heritage assets. Options to mitigate any harm arising are available and any residual harm that does exist is outweighed by the public benefits of the scheme.</p> <ul style="list-style-type: none"> • Environmental considerations relevant to the site are capable of being addressed through the design of the development. • It is confirmed that no mitigation is required in relation to the Ashdown Forest SAC. • The Highway Authority has confirmed that a suitable access can be formed to serve development on the site. • The site's performance in terms of sustainability and accessibility is equal to that of the draft site allocations for Horsted Keynes in the SADPD. <p>Summary</p> <p>Within these representations HKLLP has highlighted numerous concerns in respect of the HKNDP. Suggestions have been provided to address these concerns ahead of submission to the Local Planning Authority.</p> <p>It is considered that without revisions to the HKNDP in line with these representations the HKNDP does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. For the reasons described within these representations the HKNDP is not in general conformity with the strategic policies of the Development Plan; does not contribute to the achievement of sustainable development; and does not have regard to National Policy.</p> <p>HKLLP would welcome the opportunity to engage with the Neighbourhood Plan Group to address these concerns and comments.</p> <p>Footnotes:</p> <p>1 MHCLG, Changes to the current planning system consultation.</p> <p>2 unless the Council has reviewed and updated its strategic policies.</p> <p>3 Site Appraisal for Possible Housing Development Allocations – April 2020</p>

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086	001	Helena Griffiths	Resident		<p>DOCUMENT A</p> <p>I have undertaken a thorough review of the plan as presented. This document (Document A) contains my objections to the plan and also the amendments that I believe need to be actioned to make it a plan worthy of this village. Unfortunately, this submission is lengthy and comprehensive, due to a plethora of incorrect information being used, or inaccurate assessments within this plan. Some are inherited from the MSDC DPD, where the district has failed to address and correct issues with their plan, but others seem to stem from a continued bias to back the MSDC allocations rather than critically assess the alternative sites in Horsted Keynes. I ask that the documents are read fully, and that these comments are addressed so that I am not writing a lengthy response to the regulation 16 consultation.</p> <p>Attachments in addition to this document (Document A) are:</p> <ul style="list-style-type: none"> • DOCUMENT B – MSDC Reg 19 site-allocations-consultation submission H Griffiths • Appendix 1 – Register Plan WSX381300 Jeffrey’s Farm – front field • Appendix 2 – Covenant Front Field Jeffrey’s Farm • Appendix 3 - Counsel opinion on Front field covenant • Appendix 4 - AONB Challenge from H Griffiths • Appendix 5 - Response from AONB to challenge • Appendix 6 - GTA civils access to site 68 & 971 March 2020 • Appendix 7 - Transport report for access to site 68 & 69 from DM/16/3974 • Appendix 8 - Jeffreys Farm independent Visual Impact Assessment from DM/16/3974 • ATTACHMENT A - Hamsland transport challenge as per Reg 19 MSDC DPD • ATTACHMENT B - H GRIFFITHS factual corrections Reg 19 MSDC DPD • ATTACHMENT C – Traffic analysis of Horsted Keynes • ATTACHMENT D – Jeffreys Farm Buildings access options

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					<p>For your ease I summarise my main comments in the below bullet points. The expanded commentary and evidence supporting my comments follows in the subheadings after the summary.</p> <p>Executive summary:</p> <p>I do not support the Horsted Keynes Neighbourhood Plan (Dec 2020) as it is presented here. The basis of plan is fundamentally flawed.</p> <ol style="list-style-type: none"> 1. This plan does not protect the interests of the village, it merely promotes the wishes of Mid Sussex (MSDC), by deferring to MSDC to allocate sites, without the backing of the community. This plan removes the choice of the village to decide where development goes, and is against the ethos of the Localism Act. This key decision to defer to MSDC was not put to the village. 2. This 'new' plan has been written over the last 2 years by a consultant and 2 councillors without listening to the objections of a large number of residents. No direct involvement or engagement with the wider community (workshops) has been undertaken since 2015. They have ignored and not addressed the concerns raised at an extraordinary council meeting in May 2019. Data is out of date given the last interactive community event was the workshops held in September 2015. Updated information should have been used to add to this 'new' plan prior to it being written. 3. This plan does not protect the village from spread of development as it supports the movement of the built-up area boundary to the exterior boundary of any new development. MSDC own an area of 'land locked' land with development potential directly adjacent to a proposed allocation site, if access is gained. Advice from MSDC regarding the allocation of this land, enabling them that access to their own property, should be challenged rather than taken for granted, as it increases the likelihood of development spread on site SA29. 4. The plan in no way addresses the impact on the village of the added traffic movements, one of the highlighted issues in the village. Traffic, both during construction and after construction and the effects on the existing pinch points of

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					<p>parking and traffic flow should be of utmost concern when assessing suitability of sites. The allocation of sites SA28 and SA29 fundamentally go against the traffic concerns, and no data has been gathered to assess the impact of these sites over other reasonable alternatives.</p> <p>5. Constance Wood Field should be listed as a 'Protected Green Space' as it fulfils the criteria and is a valued green space, used by many for dog walking, and also for grassland biodiversity (Mid Sussex Blue Heart environmental ecology diversity campaign).</p> <p>6. By deferring to MSDC on allocations, this plan is inheriting the issues and incorrect data, and assumptions that have been used to make those allocations. I am submitting my comments made to Mid Sussex to their Regulation 19 consultation as part of this submission (Document B and its associated Appendices and Attachments). Unfortunately, this is a lengthy set of information, but it documents a lack of consistency and untimely corrections to information used for allocation decisions. The 'reasonable alternative' that MSDC compared the allocations to was site 216 – the smaller Police House Field – this in itself is an unsuitable and wholly inappropriate comparison, as it is the same field!</p> <p>7. This results of site selection in this plan are not sustainable, as supporting the allocation of green fields over a sizeable site with existing built form, and covered with concrete, is not sustainable. Jeffrey's Farm buildings site 68 is the only site with existing (substantial) built form, yet is ranked as having a negative impact against the specific sustainability theme requiring sites 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'. This ranking is worse than SA28 and SA29 – both green field sites. Other sustainability measures area also inaccurate.</p> <p>8. The assessment of sites does not reflect the reality on the ground. This may be due to the inherited desk top assessments from MSDC (as above), however some information and parts of assessments in this plan need correcting also – these are included later in this document. The AONB impact assessments were a desk top exercise, and cannot be justified</p>

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					<p>when comparing allocated sites. Conflicts of interest have not been addressed as crucial components of the assessments of the formerly submitted plan are still being used.</p> <p>This village needs protecting, and this plan does little to convince me that it is written with that aim in mind. The intention in this plan to defer allocation to MSDC takes that choice away from the parish. This is the first time in planning history that a bottom up approach has been available, and to take that opportunity away from the village is removing that involvement. I do not want the decision on where development occurs to be driven by the wants of MSDC with their own conflicts of interest regarding Constance Wood Field and beyond. MSDC do not understand the issues facing this village, nor do they care about the impacts on this village of development – the parishioners do and we should have a say.</p> <ul style="list-style-type: none"> • Introduction <p>The Horsted Keynes Neighbourhood Plan December 2020, in the assessments of sites document, states that Sites SA28 and SA29 have been assess against the other sites to show 'their merits on the same basis as other sites in the event that the Neighbourhood Plan may wish to take a different position by identifying a preference for other sites.' This time has come.</p> <p>A plethora of incorrect data and inconsistent rankings of the sites assessed exist in this document.</p> <p>Once corrections are made, the sustainability appraisal and the site appraisal, clearly show that the MSDC allocations of SA28 and SA29 are not the most sustainable sites in the village, and that Jeffreys Farm Buildings SHELAA 68 is more sustainable and appropriate for development, with minimal impact on the village and the AONB. Site 68 is supported by many in the village for the simple fact that it is the least disruptive to the existing traffic issues, is on the 'better' side of the village, and is barely visible to both the residents and the countryside.</p> <p>I am not alone in not supporting this plan, as unfortunately, due to the lack of community involvement over the last 2 years, the plan is likely to fail at referendum. To quote your own consultant when asked 'how many plans have failed at referendum?', he</p>

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					<p>replied, that plans that had fundamental errors, and also plans that had had little engagement with the community were the ones that failed. I believe both of these aspects are true of the plan as presented.</p> <p>I outline the reasons for my objection to this plan below:</p> <p>1. This plan does not protect the interests of the village, it merely promotes the wishes of Mid Sussex (MSDC),</p> <p>By deferring to MSDC to allocate sites, this plan has lost sight of the key issues affecting the village. It does not protect the village from traffic speed, volume and weight, the loss of biodiversity, or inappropriate development. In fact, the allocation of Sites SA28 and 29 does the opposite.</p> <p>It is well known that MSDC own Constance Wood Field (and the land to the south), an area currently 'land locked' without access. Deferring to MSDC to choose the allocations in Horsted Keynes has given them the opportunity to allocate SA29, directly adjacent to their land. This is a conflict of interest and should have been, and could have been challenged, and avoided if the village had the decision. Advice from MSDC regarding the allocation of this land, enabling them to gain access to their own property, via site SA29, should be challenged through the Neighbourhood plan, to protect the village from spread of development on to Constance Wood and beyond.</p> <p>Removing the choice of the village to decide where development is located falls short of people's expectation of a Neighbourhood Plan, and is against the ethos of the Localism Act. Yet this decision was made without involving the community at workshops or information sessions. Through the lack of engagement to take the village 'along for the ride', many people do not understand the implications of the decision that was made by Council. That key decision should have been put to the village, as it fundamentally changed the process on how and where development is sited.</p> <p>2. No direct involvement or engagement with the wider community (workshops) has been undertaken since 2015</p> <p>Since the withdrawn plan, this 'new' plan has been written over the last 2 years, the authors being a planning consultant and 2 councillors. No other people have been involved in a 'steering group', despite resolutions at council that others from the</p>

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					<p>community would be included in a steering group. Decisions have been brought to council for endorsement, with little discussion in the public forum.</p> <p>In the last 2 years, no minutes or notes are available from 'steering group' meetings, and none were open to the public. No minutes or notes are available from meetings with third parties. The creation of this 'new' plan has lacked openness and transparency with the community, and landowners.</p> <p>The last engagement involving the public was an extraordinary meeting in 2019. It was a heated meeting, yet little heed was taken to the concerns and issues raised by many villagers regarding the path the plan was taking. There has been no listening to the objections of a large number of residents, including petitions with over 300 signatories.</p> <p>This is not a plan written by the village for the village, and I don't believe it will have support as a result.</p> <p>3. This plan does not protect the village from spread of development, instead promoting the spread of development</p> <p>This plan supports the movement of the built-up area boundary to the exterior boundary of any new development. Due to planning regulations, that in itself opens up new swaths of land for development potential, just by the juxtaposition against the new built up area boundary. But let us consider what the built-up area boundary is - the built-up area boundary of Horsted Keynes does not reflect the true built extremity of the housing of the village, as the properties down Treemains Road (from Lewes Road) are not inside the boundary. So ultimately it is not defining the built form of the village accurately or adequately.</p> <p>None the less, there is no attempt within this plan to stop developers or landowners opening the door to adjacent areas. This could be protected by specifying that a defendable boundary is required (such as orientating houses with their gardens to the built-up area boundary, or ensuring no spread of development without parish consent through covenanted land strips).</p> <p>The biggest threat is posed by Site SA29 which is directly adjacent to a 'land locked' parcel of land with no viable access, owned by MSDC. With the allocation of SA29, being driven by MSDC, this opens up the once land locked parcel. Site plans</p>

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					<p>provided by the developer of SA29 show their plan with a 'turning spur' located conveniently adjacent to the boundary with the MSDC fields. This imminent threat should be protected against by specific requirements for defendable boundaries strictly controlled being written in to the Neighbourhood Plan.</p> <p>Some people doubt that MSDC will develop Constance Wood Field, but the ease and lack of controls, should access be gained, should be stopped, or at least controlled through this plan. MSDC are the decision makers on district planning policy, hence DPD allocations. They are also the decision makers on planning applications, and yes, they can grant themselves planning approval!</p> <p>The allocation of SA29 should be challenged, rather than taken for granted, as it greatly increases the likelihood of development spread.</p> <p>4. The plan in no way addresses the impact on the village of the added traffic movements, one of the fore most issues in the village.</p> <p>The plan policy HK1 – location of new development - states 'Proposals should also be supported by a robust assessment of the impact of the proposal on the local highway network and include appropriate mitigation measures secure the safe, free flow of traffic, as necessary'. This is reflecting the key issue in the village of 'traffic speed, volume and weight'. Traffic, both during construction and after construction and the effects on the existing pinch points of parking and traffic flow within the village should be of utmost concern when assessing suitability of sites.</p> <p>The proximity of a proposed site to a peripheral route out of the village is not a reasonable mitigation measure, as residents take the most direct route to their destination. I have not heard of people travelling from Lucas, on the western periphery of the village, out to Danehill and then to Haywards Heath (the predominant location of extra services not provided in the village) - they will travel directly through the village centre.</p> <p>To protect the village from unacceptable traffic impacts from a new development, a site should not be allocated prior to the assessment of its impact on local traffic, and this includes MSDC allocations – it should be only allocated when it can be seen to NOT add undue stress on the villages road network, or at existing</p>

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					<p>pinch points. This plan in no way addresses the impact on the village of the added traffic movements both during construction and after construction on the village, or assesses the existing pinch points of parking and traffic flow. The deferred allocation of sites SA28 and SA29 fundamentally goes against HK1, as the two sites require movement of traffic through the worst pinch points in the village. This plan should protect the village but no data has been shown within to assess the local traffic impact of sites.</p> <p>I have collated data to show the parking issues, the main flow direction of traffic out of the village from selected sites, and also the number of affected houses along those routes from the selected sites. This information is presented in Attachment C. To summarise the information:</p> <ul style="list-style-type: none"> • The vast majority of the village travel to Lindfield or Haywards Heath to access services not available in the village, such as doctor, dentist, pharmacist, bank, weekly grocery shop, etc.. This information has not been assessed for inclusion in the assessment of sites, but following a poll on Horsted Keynes Gossip (3/12/20 to 7/12/20) 87 respondents out of a total of 98 stated that Haywards Heath / Lindfield was the place villagers travelled to most frequently for services. This suggests that Keysford Lane or Treemans Road, to the west and south of the village are the most used. It would thus be reasonable to give greater importance to sites in these areas of the village to reduce the amount of traffic through the village centre and other pinch points. • It just takes a walk around the village to understand the pinch points for traffic flow and parking in the village. I have supplied a map showing the main areas and ranking them as severe or moderate – severe reflecting frequent or constant issues affecting the traffic flow, and moderate reflecting sporadic issues affecting the traffic flow. • The highest ranked areas for traffic issues are: two areas along the Green (due to parked cars reducing the flow of traffic to a single vehicle – especially an issue with the bus and larger vehicles); and Hamsland (again where parked cars reducing the flow of traffic to a single vehicle, and no passing places available on a blind bend, clearly a safety issue). Smaller pinch points exist

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					<p>but are of less concern.</p> <ul style="list-style-type: none"> • The allocation of SA28 Police House Field would increase traffic (assuming that the majority of traffic from the site is heading towards Haywards Heath, as per current residents) passes through the two severe pinch points on the Green. The increase of traffic will affect 97 houses along the route out of the village. This will exacerbate traffic issues on the Green. I fail to see how this can be mitigated against by the developer or MSDC, so I believe this plan should address the issue. • The allocation of SA28 St Stephens Field would increase traffic (again assuming that the majority of traffic from the site is heading towards Haywards Heath, as per current residents) passing through the existing severe pinch point along Hamsland. The increase of traffic will directly affect 46 houses – but this number only reflects the number of house entrances passed, not those also living in the Challoners Hamsland cul-de-dac who pass this pinch point to access their properties. Again, I fail to see how this can be mitigated against by the developer or MSDC, so I believe this plan should address the issue. • In contrast, the traffic associated with the realistic alternative sites on Jeffrey's Farm (sites 68, 69, 971) would pass one small severe pinch point at the northern end of Sugar Lane, when heading to Haywards Heath. The increase of traffic will directly affect between 9 and 12 houses, depending on where an access to the site/s would be. The pinch point is caused by a small handful of cars parked outside properties that have no driveways on Sugar Lane. Given the Landowner who is promoting the sites on Jeffrey's Farm owns the land adjacent to the pinch point, it is possible for the issue to be mitigated by the provision of parking on the broad verge on their property. This has not been considered when assessing the Jeffrey's Farm sites. It is clear that the Jeffery's Farm sites have the least impact on traffic of the sites put forward, as it is on the 'right side' of the village. • The additional flow of traffic may be considered by Mid Sussex to be minimal in comparison to the flow of traffic across the district, but this is an important threat to the village and this plan should seek to address it on a local level, and not defer to Mid Sussex to decide if impact is great.

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					<p>I would like to see a proper analysis of the impact of traffic movements across the village of both the proposed Mid Sussex allocations and also alternative sites, and this should be weighted as high importance when assessing sites. To wait for this information post allocation is negligent in protecting the village and maintaining its flow of traffic, as we have seen that WSCC Highways have not objected to applications that will exacerbate traffic congestion in several places in the village already. Of note the traffic report from the SA29 developer presented for the DPD is factually incorrect and should be challenged (my analysis of this misleading document can be seen in Attachment A).</p> <p>This plan should address this fundamental issue on a local level, as traffic is a big issue in the village.</p> <p>5. Constance Wood should be listed as a 'Protected Green Space' (HK7 – Local green spaces)</p> <p>Constance Wood should be listed as a 'Protected Green Space' in Policy HK7 as it fulfils the criteria, and is a valued green space, used by many for dog walking, and also grassland biodiversity (Mid Sussex Blue Heart environmental ecology diversity campaign). It is described in this plan as a 'third recreation ground on the southern edge of the village (section 2.5)', so should be protected as such.</p> <p>Constance Wood field (and the adjoining field to the south), owned by Mid Sussex is becoming increasingly under threat from development spread as it directly abuts the built-up area boundary along Hamsland, and the boundary will move to the exterior edge of St Stephens Field should it be developed, hence surrounding the Constance Wood fields on 2 sides. This plan fails to protect the recreational value that residents put on this land, and to protect it from future development. Mid Sussex have indicated to residents in close proximity to the land that they are considering it as a development option.</p> <p>Constance Wood field fulfils all three designation requirements: it is contiguous with Hamsland, so is proximal to the village; it is used for recreation by dog walkers and the like, and is being promoted by MSDC as a Blue Heart campaign area for wild flower and plant regeneration, so is valued by the community; the area of land it covers is 3.46acres in comparison to the 3.81acres of</p>

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					<p>the Recreation Ground area, so is similar in size to those areas already proposed as a Protected Green Space in the plan.</p> <p>This plan needs to protect our green spaces. I would like to see Constance Wood Field allocated as a protected Green Space in policy HK7.</p> <p>6. By deferring to MSDC on allocations, this plan is inheriting the issues and incorrect data and assumptions that have been used to make those allocations.</p> <p>I am submitting my comments made to MSDC for their Regulation 19 consultation as part of this submission (Document B), and other documents providing evidence, correct data and highlighting mistakes in application of information (Appendices 1 to 8, Attachments A and B). Unfortunately, they are a lengthy set of documents, but it shows a lack of consistency and untimely corrections to information used for the DPD allocation decisions.</p> <p>The 'reasonable alternative' that MSDC compared the allocations to was site 216 – the smaller Police House Field – this in itself is an unsuitable and wholly inappropriate comparison, as it is the same field!</p> <p>7. The results of site selection in this plan are not sustainable.</p> <p>When reviewing the sustainability assessment of sites it is clear that a sense check has not been carried out to assess if the results are reasonable.</p> <p>The sustainability appraisal of sites uses unweighted qualitative input data – that is to say that the importance given to one set of inputs is the same as all the others (for example the weight of protecting biodiversity is an equal weight to that of addressing local housing need) and no numerical quantitative comparison is made. In general, this can give a good assessment of the sustainability impact of sites. However, the more aspects that the sites are assessed against, the more the important data becomes diluted – is a 2 minute longer walk to a school of same importance as protecting biodiversity by not building on a green field? It is also imperative that the result is sense checked, against the driving themes (#1 through #11).</p> <p>When sense checking the sustainability appraisal it can be seen</p>

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					<p>that issues exist. How is a site with a low impact on the AONB (so protecting the landscape setting #1 and #3), with existing built form (thus not destroying biodiversity of a greenfield #2 and #3), on a favourable side of the village (so not causing traffic disruption #8), with area to site 18 homes (thus adding positively to local housing needs #4), with no impact on heritage assets (#6), assessed as to not being sustainable? Reference Jeffrey’s Farm Buildings – site 68, being described as ‘not representing sustainable development’.</p> <p>In comparison, a site with a moderate impact on the AONB (so having <u>some</u> harm on the landscape setting #1 and #3), with <u>no existing</u> built form on an agricultural field (thus destroying biodiversity of a greenfield #2 and #3), with travel through the length of the village to access distant services (so causing additional traffic disruption to an area with severe constraints to flow of traffic #8), directly opposite a listed building (surely having <u>some</u> impact on the heritage asset #6), is assessed as sustainable. Reference Police House Field – allocated site SA28 – described as one of ‘the most sustainable sites to allocate for housing development’.</p> <p>This disconnect shows that there are issues with the analysis. The table below shows a form of weighting that has been made to the data. But again when sense checking this against the relative assessments of sites ranking is not reproducible.</p> <table><tr><td>++</td><td>Significant positive impact on sustainability objective</td></tr><tr><td>+</td><td>Positive impact on sustainability objective</td></tr><tr><td>++</td><td>Possible positive impact or slight positive impact on sustainability objective</td></tr><tr><td>0</td><td>No impact or neutral impact on sustainability objective</td></tr><tr><td>-?</td><td>Possible negative impact or slight negative impact on sustainability objective</td></tr><tr><td>-</td><td>Negative impact on sustainability objective</td></tr><tr><td>---</td><td>Significant negative impact on sustainability objective</td></tr></table> <p>Sustainability Theme #3’s objective is to ‘protect the landscape setting of Horsted Keynes village by focusing development on</p>	++	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
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					<p>previously developed land and minimising the use of land within the Area of Outstanding Natural Beauty'. Jeffrey's Farm Buildings site 68, the ONLY site put forward with existing built form, is assessed as having a negative impact on the objective. In contrast, St Stephens Field SA29 and Police house Field SA28, both green fields in the AONB, are both assessed as only a <u>slight</u> negative impact. Jeffreys Farm Buildings should rank as a significant positive impact on the sustainability theme.</p> <p>Sustainability Theme #4 has the objective to 'ensure that housing addresses the needs of the existing community of Horsted Keynes before addressing wider needs'. Comments made regarding the Jeffreys Farm Buildings site 68 quote that the site 'is likely to only have potential for a limited number of dwellings, potentially 6-8 dwellings in a courtyard-style development. This quantum of development would only provide for a limited amount of Horsted Keynes's needs and not be subject to affordable housing requirements'. The AONB have assessed the site for 18 dwellings, so the limiting of numbers to only a few dwellings is ill-informed (possibly being guided by previous members of the steering group with direct conflicts of interest in this site). The incorrect housing number is inadvertently restricting the site from the correct ranking of having a positive impact on addressing some of the local housing need. In addition, to only develop a site of this size for 6 to 8 dwellings would be not making effective use of land, (a requirement set out in paragraphs 7-14 of the National Planning Policy Framework 2019). The site is 0.75ha, in comparison with St Stephens Field SA29, being allocated for <u>30 units</u> on 1.13ha.</p> <p>Sustainability Theme #8 has the objective to 'improve safe movement around the parish and to key service centres outside the parish by a range of modes', including addressing the 'levels of traffic travelling through the centre of Horsted Keynes village'. Jeffreys Farm buildings site 68, and the other sites at Jeffrey's Farm will not add dramatically to the through flow of traffic in the village, as the majority of villagers shop and use services in Haywards Heath and Lindfield (see information in section 4 of this document and Attachment C). Yet the sustainability assessment seems to focus more on the access, rating the site as having a negative impact on the theme, stating 'It is difficult to achieve</p>

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					<p>safe access to site H (Jeffreys Farm Buildings), both technically and in terms of impact on the landscape'. A plan is submitted as part of this submission (Appendix 7) showing how safe access can be achieved by moving the current access to the north, to accommodate visibility splays. This will require the removal and <u>replanting</u> of hedges, and also the felling of 4 trees, but given the size of the farm as a whole <u>mitigation measures and replanting of many more trees</u> can be achieved with ease. In contrast sites SA28 and SA29 are assessed as a <u>slight</u> negative impact, and that the sites 'will need minor improvements to achieve safe access', yet both sites put under severe threat elements of the landscape – notably a mature oak directly abutting the proposed visibility splays on site SA28, and a whole line of hornbeam and oak along western boundary of the proposed entrance track to SA29. I would be surprised if the trees in question survive the disruption to their root system, yet MSDC tree officer was unwilling to put TPO's on these threatened trees.</p> <p>Sustainability Theme #8 has the objective 'to ensure that the community has adequate access to the key services it needs, including convenience shops and schools'. The lower ranking of site 68 and site 971 for being an extra 2 minute walk to the school, when the school <u>is accessible</u> from the sites using existing footpath infrastructure appears to manipulate the data to make these sites look poor sustainably. The distance to the school is only one of 4 measures of this sustainability theme. When these corrections are made the impact of sites 68 and 971 on the access to local infrastructure will be positive, and comparable to many of the other sites including SA28 and SA29, rather than a minor positive impact.</p> <p>Sustainability Theme #9 and #10 both downgrade Jeffreys Farm buildings site 68 due to the size of the development put forward in this plan. As mentioned above (Sustainability theme #4), the size of the development on Jeffreys Farm buildings site 68 is being downgraded on incorrect information, as the AONB have assessed the site for 18 units, not 6 to 8. The site can achieve the larger number so will have a greater positive impact on 'supporting the continued provision of community facilities by bringing more people to live in the village', than ranked currently. The site will also be able to achieve the 'incorporation of</p>

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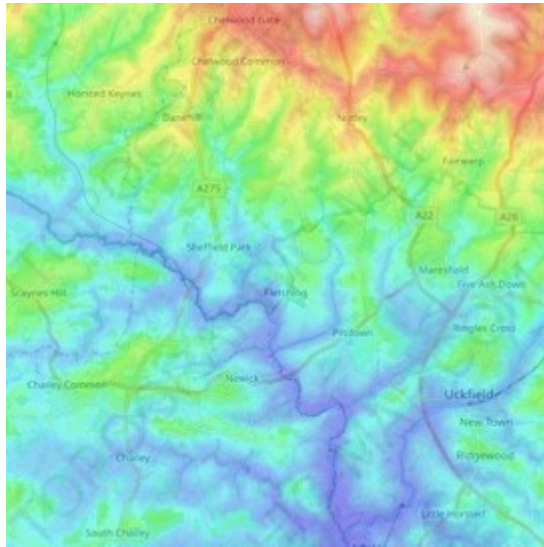
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					<p>sustainability features such as rainwater harvesting, green roofs, better insulation and household-level sustainable energy schemes such as solar panels and heat pumps’ - and with the larger housing numbers should not be ranked lower than other sites.</p> <p>When the above corrections and amendments are made to the sustainability assessment of the sites in Horsted Keynes, the sites at Jeffrey’s Farm, and specifically the Farm Buildings site 68 are comparable, if not more sustainable than the sites being put forward by MSDC for allocation. This obviously brings issues to the validity of those allocations, and also the consequences of the delegation of allocations of SA28 and SA29 to MSDC, before a proper sustainability assessment had been carried out in association with this plan. Was the decision to defer allocation to MSDC premature? There are other more sustainable sites than those allocated by MSDC in the village, namely Jeffreys Farm Buildings site 68, yet this site is NOT allocated. This means the plan does not conform to NPPF which suggests ‘presumption in favour of sustainable development’.</p> <p>8. The assessment of sites is not comparable with the reality on the ground.</p> <p>A disconnect exists between the perception by villagers of the impact of development of sites, versus the assessment results of the sites. Again, a sense check seems to fail.</p> <p>The site appraisals have been undertaken in line with the method for the site appraisal ‘used in the Site Allocations DPD and set out in detail in “Site Selection Paper 2 –Methodology for Site Selection”’. Unfortunately, MSDC failed on multiple occasions (following proforma distribution in May 2019 and Regulation 18 submissions) to correct information. Amendments were provided in consultation with landowners and also public consultation. Incorrect information has thus been inherited in to this plan for multiple site appraisals. Document B is my representation to MSDC Regulation 19 consultation, and Attachment B documents the amendments highlighted from reviews of the DPD assessments. The amendments in those documents should be applied to this assessment where appropriate.</p> <p>For the amendments in this plan I approach the issues site by site, outlined below. I only address the MSDC allocated sites</p>

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					<p>(SA28, and SA29) and what I consider to be more sustainable and more suitable options on Jeffrey's Farm, but given the amount of inconsistencies in these assessments, I can only assume that the <u>other site assessments need to be re-examined also</u>.</p> <p>Jeffreys Farm Buildings site 68</p> <ul style="list-style-type: none"> • Potential number of dwellings: 6 - The AONB have assessed the site for 18 dwellings, so the limiting of numbers to only a few dwellings is ill-informed (possibly being guided by previous members of the steering group with direct conflicts of interest in this site). To only develop a site of this size for 6 to 8 dwellings would be not making effective use of land, (a requirement set out in paragraphs 7-14 of the National Planning Policy Framework 2019). The site is 0.75ha, in comparison with St Stephens Field SA29 of 1.13ha, which has been allocated for <u>30 units</u>. If the same density is used at site 69 the dwellings would be 20, not 6, but the site promoter suggests 18 to reduce the density reflecting the village edge location. • 11.Highways: Local – 'Existing access unsurfaced' – this is not correct – the existing access is surfaced and regularly has heavy tractors, substantial lorries servicing the farm and residential car traffic along it. The surface will need upgrading for use as an access for a development, but is surfaced none the less. • 11.Highways: Local – 'northward realignment' 'to achieve better visibility and reduce conflicting turning movements at junction between Sugar Lane and Lewes Road - there would be a loss of tree and hedgerow vegetation which would be harmful to the AONB' - This access option would require the removal and <u>replanting</u> of hedges, and also the felling of 4 trees, but given the size of the farm as a whole <u>mitigation measures and replanting of many more trees</u> can be achieved with ease. A plan is provided to show this access option is shown in Appendix 6. <p>The AONB <u>do not comment</u> on the access in their appraisal of any of the sites, but given the site is the only site with substantial built form, to dismiss it from consideration on realigning the access and the nominal removal of vegetation seems disproportionate to the alternative sites on green fields. In the conclusions of the site assessment the note is made that Site 69 'will require a safe access off Sugar Lane <u>which does not, in itself,</u></p>

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					<p>harm the AONB'. As this is the case the highways ranking should be amended from severe, to minor.</p> <ul style="list-style-type: none"> 11.Highways: Local – A further access option is available, and achievable, where the hedgerow and trees would be retained. A plan is provided to show this proposal in Attachment D – option 2. The realignment of the Jeffreys Farm access by 2m to the east into the road would enable visibility splays. Given the verge across the road in this location is 7m wide, to realign the road is achievable. The junction of Lewes Road could then be moved to the north to reduce any conflict with the access. All of this land is in the possession of West Sussex Highways so is available for such changes. Note: the current road layout at the junction of Lewes Road and Sugar Lane is not a 'historic' layout having been changed in the late 1970's from a triangular road system. This option does not affect the trees or hedge line, so is a viable alternative, and the use of highways land is comparable to site SA29. 14.Education: distance to primary schools – <u>Colour</u> annotation for the distance from the site to the school has been incorrectly assigned as yellow. The distance is 1.124km (as measured on Promap), so is correctly classed as a 10 – 15 min walk but the colour annotation should be light green, if following the MSDC guidelines for Education in the Site Selection Paper 2 - Methodology for Site Selection. <p>In summary when the above amendments to the assessment are made, Jeffreys Farm Buildings site 68 would challenge the allocations of SA28 and SA29, and should be considered more suitable, as the site carries substantial existing built form, rather than being development on a green field. This is conclusion would be supported in an amended sustainability assessment also.</p> <p>Jeffreys Farm Northern Field site 69</p> <ul style="list-style-type: none"> 1. AONB – 'High impact on the AONB, as development would be out of character with the settlement pattern of Horsted Keynes'. There seems to be an inconsistency of the AONB assessment of this site when compared to other sites in the village. This inconsistency has been highlighted to the AONB unit in September 2019 by form of a challenge document sent to the AONB. This challenge document can be seen in Appendix 4. I would ask you to consider Appendix 4 in its entirety.

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					<p>Site 69 is one of only 2 sites put forward in the call for land that are modern field systems. The AONB response (Appendix 5) says that the assessments were <u>only desktop assessments</u> and should be supplemented with evidence of visual impact, and that mitigation should be considered by the district and parish council. The site is surrounded by dense vegetation (see independent Visual Impact Assessment in Appendix 8) – substantially more than the allocated sites of AS28 and SA29, but mitigation to increase the screening is possible and has been proposed by the site promoter (as documented in planning application DM/16/3974 with an accompanying visual impact assessment – Appendix 8).</p> <p>The settlement pattern of the village naturally follows the topography. Horsted Keynes sits on a sandstone ridge running NE – SW (see digital terrain map below). Given the site is on the W of the village this does conform to the settlement pattern.</p>  <p>5.Heritage-listed buildings – The situation of Ludwell Grange benefits from ‘a degree of screening provided by topography and hedgerows’, yet impact is deemed to be medium impact. When comparing the assessment of Lucas Farm directly opposite SA28 the assessments on impact are dramatically different, with a low</p>

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					<p>impact being given at Lucas Farm, despite there being substantially less vegetation cover. No heritage consideration is given to site SA28 and the site previously having had farm buildings and a small yard in the NE corner being associated with Lucas Farm (within living memory).</p> <ul style="list-style-type: none"> • 11.Highways: Local – The statement that ‘Development in this location may be more car dependent than in some other locations’ should be removed, as <u>any</u> site in Horsted Keynes is dependent on a car due to the rural nature of the area. This is highlighted in the community profile (section 2.15) as ‘Car ownership and dependence is correspondingly high’ throughout the village. • 14.Education: distance to primary schools - <u>Annotation</u> for the distance from the site to the school has been incorrectly allocated to be a 10 minute walk. It is a 10-15 min walk (1.072km) so the annotation needs to change to reflect that, if following the MSDC guidelines for Education in the Site Selection Paper 2 - Methodology for Site Selection. • Summary: The statement ‘Access arrangements still need to be clarified, but should be achievable’ is made. As per the previous applications on this site (DM/16/3974 and DM/19/0957), access is proposed close to Jefferies. Detailed plans of this can be found in the application (but further clarification and information can be provided should it be required), This proposed access location was supported by WSCC Highways. Any hedgerows would be moved (by replanting) and improved, <u>not</u> ‘lost’, and the access road would be hedge lined also. Site 69 is bounded by roads on 2 sides so if this particular access proposal was unsuitable then many other alternatives exist. <p>The assessment of site 69 Jeffrey's Farm Northern Fields is fundamentally flawed due to disputable and incorrect information being used to assess the site. The advice of a high impact on the AONB is able to be successfully mitigated through targeted planting, and a well thought out development. The size of the site and the previous application would have provided SANG (Suitable alternative natural green space) on site. This has been proposed and reference should be made to the mitigation planting referred to in the previous application on the site DM/16/3974. The AONB assessment of site 69 should be challenged. Conflicts of interest</p>

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					<p>with previous members of the steering group bring in to question the assessment of the site, given it is the best screened site, on a modern field system, and is not out of character with the settlement pattern. The existing mature hedge lines and the proposed planting schemes will mitigate any impact on the listed buildings. Site 69 is directly comparable to the allocated site SA28 and SA29, and should be proposed an alternative to the contentious MSDC allocated sites.</p> <p>Site 68 was previously allocated in the withdrawn Neighbourhood Plan. No evidence is presented within this new plan to warrant how the site has changed, or why it is no longer allocated.</p> <p>Jeffreys Farm Southern Field site 971</p> <ul style="list-style-type: none"> 1. AONB – states a 'High impact on the AONB due to loss of medieval field and development out of character with the settlement pattern of Horsted Keynes'. This field is not a complete medieval field system due to the development of Twittens, Smarties, The Cottage, and part of the farm buildings (historic maps can be provided to show this on request). As such site 971 should be directly comparable with St Stephens Field SA29, which was assessed as low impact, as it is also a partial medieval field system. Again, the settlement follows the NE-SW topography of the Weald ridges, so being SE of the village site 971 is not out of character with the settlement pattern. 1. AONB – 'Sugar Lane is a historic routeway, which provides a strong edge to the village'. This comment is irrelevant as the site does not abut Sugar Lane. It abuts the rear of residential properties on Lewes Road. Again, the settlement follows the NE-SW topography of the Weald ridges so being SE of the village site 971 is not out of character with the settlement pattern. Sugar lane (or the extension of it along Lewes Road Treemains Road) has been developed on the western side, so any strong edge has already been 'breached' by development. 11.Highways: Local – Please refer to information in this document on access associated with site 68 the Jeffreys Farm Buildings. Site 971 is not proposed to access Lewes Road directly, so the comment 'Existing frontage development on Lewes Road constrains construction of a new access point to the south of the existing access to Jeffrey's Farm' is irrelevant. The statement that 'Development in this location may be more car dependent than in

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					<p>some other locations’ should also be removed, as any site in Horsted Keynes is dependent on a car due to the rural nature of the area. This is highlighted in the community profile (section 2.15) as ‘Car ownership and dependence is correspondingly high’ throughout the village.</p> <p>The assessment for site 971 Jeffrey’s Farm Southern fields is fundamentally flawed due to disputable and incorrect information being used to assess the site. The issues around access are unfounded, and the advice of a high impact on the AONB is able to be successfully mitigated through planting and a well thought out development that would reflect similar style residential housing directly adjacent to the site bounding the western side of Treemans Road. Site 971 should be deemed accessible, and that the impact on the AONB can be successfully mitigated, and hence is directly comparable to the allocated site SA29, and could be an alternative to the contentious MSDC allocated site.</p> <p>Police House Field SA28</p> <ul style="list-style-type: none"> • 1. AONB - The AONB suggest that they consider a development of this site would overall be ‘Moderate impact’. But the AONB comments initially states that ‘High impact on AONB due to loss of medieval fields and development too isolated and separate from existing village core uncharacteristic of its settlement pattern. If access available from Birchgrove Road and development restricted to northern field, impact would be moderate’. There seems to be an inconsistency of the AONB assessment of this site when compared to other sites in the village, notably site 69. This inconsistency has been highlighted to the AONB unit in September 2019 by form of a challenge document sent to the AONB. This challenge document is Appendix 4. I would ask you to consider Appendix 4 in its entirety. The response from the AONB to this challenge (Appendix 5) highlights some comments that should be considered when assessing SA28 for allocation. Notable ‘No information was available at the time of the AONB assessment suggesting that mature trees or hedgerows would need to be removed so this was not taken into account’. Also, site assessments ‘did not take into account any further information provided by developers for the SHELAA or to support

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					<p>planning applications’. As a result, the removal of screening along Birch Grove Road, and the possible harm to the single oak on the verge affecting sight lines (see developer proposal as part of the DPD) have not been considered by the AONB.</p> <p>5.Heritage-listed buildings - The assessment states that ‘Listed building opposite the site at Lucas Farm, but assessed as less than substantial (low) impact’. It does not comment on the old barn and farm yard that used to be in the NE corner of site SA28, that would have been connected to the Lucas Farm assets. The impact assessment seems at odds with the location of the listed building, it being directly opposite the site and not screened from the site by any vegetation that will be retained. This is at odds with assessments of the impact of site 69 on listed buildings that are well screened, and are also a distance away from planned housing (Ref application DM/16/3974).</p> <ul style="list-style-type: none"> • 11.Highways: Local – states that there may be ‘limitations arising from the oak tree’ on the sight lines needed to access the site. The recent access plans provided by the developer show the visibility splays to directly abut the trunk of the large characterful oak tree at the entrance to the village. This <u>must have an impact</u> on the tree roots and the tree itself to have new tarmac placed right against the trunk, and thus this critical threat should be reflected in the AONB assessment. • Concluding remarks – the developer is to ‘utilise existing tree cover around the site boundaries and across the centre of the site’. There is no tree belt across the middle of the site, unless this assessment is considering the spread of development to the southern field – which would then be seen as a high impact on the AONB. <p>The impact of the development of SA28 on the Grade II listed Lucas Farm should be reconsidered, as the medieval field systems and historic barn and yard were clearly associated with and proximal to Lucas Farm, yet have not been considered. The advice of a moderate impact on the AONB is disputable as the removal of mature trees and vegetation along Birch Grove Road has not been assessed. This provides evidence that the plans support of MSDC allocation of site SA28 should be reconsidered. This provides evidence that SA28 should be reassessed, and could be removed as an allocated site in favour of other sites that are less impact.</p>

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					<p>St Stephens Field SA29</p> <ul style="list-style-type: none"> 1. AONB - The AONB had advised that they consider a development of this site would be 'Low impact'. There seems to be an inconsistency of the AONB assessment of this site when compared to other sites in the village, notably site 971, as both sites are <u>part</u> of a medieval field system, already compromised by existing development. This inconsistency has been highlighted to the AONB unit in September 2019 by form of a challenge document sent to the AONB. This challenge document is Appendix 4. I would ask you to consider Appendix 4 in its entirety. The response from the AONB to this challenge (Appendix 5) highlights some comments that should be considered when assessing site SA29 for allocation. The AONB have not considered the 'The removal of mature trees to access site 184 (SA29)'. The developers current plans show that the access will disrupt the roots of many mature trees along a length of the access road, being within 2m of the tree trunks. 9.Trees/TPOs - 'Trees along southern and western boundaries of the site, which need to be safeguarded', but I fail to understand how that is possible given that the developers current plans show that the access will disrupt the roots of many mature trees along a length of the access road, being within 2m of the tree trunks. Any mitigation and the method should be outlined in this plan before the MSDC allocation is supported, to ensure that these trees are protected. 11.Highways: Local – the assessment states 'Existing access off Hamsland requires improvement, likely to involve widening of the street opposite, within highway land', but it does not address the information received by Horsted Keynes Parish Council and openly discussed in council meetings, where the developer has stated that there will need to be a 5 meter protection zone adjacent to the mature trees along the western edge of the access track, to protect and retain the distinctive tree line. How is access considered available when the access track is only 7m wide? The land to the east of the access is NOT in the developers ownership, so access is restricted by third party land ownership. This access should be reassessed as 'Severe', until land is purchased and access is proven to be viable without

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					<p>affecting the tree belt along the access road, including suitable visibility splays.</p> <ul style="list-style-type: none"> • 13.Infrastructure – the omission of the impact on the Hamsland infrastructure is amiss. Hamsland is a cul-de-sac accessed by a road with permanent parking issues, making it a single track entrance and exit, with stress on the infrastructure already. This development will cause a huge impact on traffic levels, and the cul-de-sac is already at bursting point for parking. The developer submitted parking survey was totally inaccurate. I attach an analysis of this survey that claimed Hamsland was only at 50% capacity (Attachment A). Anyone who lives in Hamsland / Challoners will realise this is not correct. <p>Any highway 'improvements' would require the widening of the road through the single access road to the site, which would involve the removal of green verges and the construction of pedestrian barriers to enable the level differences to be safely maintained. This is not an 'improvement' and is making a village environment distinctly city like, and would be a severe impact on the residents. No mitigation has been suggested for the effects of additional traffic and the safety and well-being of the 129 existing households serviced along the same single-carriage way road. This plan should address this to ensure the fundamental issues of traffic speed, volume and weight in Horsted Keynes is addressed adequately before support is given to the MSDC allocation.</p> <p>The assessment for SA29 is fundamentally flawed due to disputable and incorrect information being used to assess the site. The access statement should be reconsidered, and the advice of a low impact on the AONB is disputable if the tree line along the western access boundary will be damaged or removed. This provides evidence that the plans support of MSDC allocation of site SA28 should be reconsidered. This provides evidence that SA29 should be reassessed, and could be removed as an allocated site in favour of other sites that are less impact.</p> <p>Updated evidence base - suggested amendments Thorough review of other documents has highlighted other issues, outlined below:</p> <ul style="list-style-type: none"> • The omission of the Jeffreys Farm application for 42 houses on sites 68 and 69 (DM/16/3974) in the updated evidence

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					<p>base shows that the plan has not been assessed against all relevant data, within the public domain. The application outlines the type of housing put forward, the orientation of housing, the mitigation measures and planting, and the extensive associated recreational space proposed (SANG?) - all aspects that should be considered. The plan runs from 2016 and the application was submitted in 2016 – the data table of applications only lists application from Nov 17.</p> <ul style="list-style-type: none"> • Updated evidence base - Table on section 25 is not up to date – appeals are in process on Peacocks, and Birch Grove Road • Updated evidence base - Section 28 table – the windfall table should show completion date to show that it is within 2016 as applications state 2014 to 2015 (outside the plan date). <p>Westall numbers – the plan states C2 contribution are based on the amount of accommodation 'released on to the housing market'. To my knowledge these properties will not be put on the open market so might not be able to be included.</p> <ul style="list-style-type: none"> • The MSDC DPD Sustainability appraisal (Site selection report #3) is not properly considering reasonable alternative sites in Horsted Keynes – MSDC used SHELAA 216 (smaller Police House field) as a comparison, but this is essentially comparing the same site as Site 216 is a subset of SA28! <p>Summary</p> <p>I do not support this plan in its current form. I understand that policies within this plan do protect some elements of the planning process, but deferring the site allocations to MSDC in their DPD does not protect the village in multiple ways. <u>Any</u> plan isn't what this village wants – we want the best plan for the sustainability of this village.</p> <p>The plan needs to protect this village by allocating Constance Wood as a 'Protected Green Space', and being prescriptive in how any allocations are developed to stop the spread of development in to the countryside. The plan needs to protect the community and the effects of traffic weight, flow and parking, by properly addressing the impact of a development on the existing traffic issues on our <u>local</u> roads (not deferring to the wider infrastructure as assessed in the MSDC DPD).</p>

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					<p>The advice of MSDC needs to be challenged regarding the allocation of St Stephens Field SA29, as this is a clear conflict of interest. The inconsistency of data for the Jeffery's Farm sites should also be challenged with the AONB, as their assessments are not consistent across sites.</p> <p>Jeffreys Farm Buildings site 68 is more sustainable than the MSDC allocated sites (being previously developed, sizeable with existing access, and being well screened from the residents and also the countryside). This analysis shows that the decision to defer allocations to MSDC was a premature one, as not all information had been considered. By not allocating site 68 this plan is letting down the people of the village and also directly impacting the environment unnecessarily.</p> <p>Site 68 was previously allocated in the withdrawn plan. No evidence is presented within this new plan to warrant how the site has changed, or why it is no longer allocated.</p> <p>This plan is a resubmission, and the lack of community involvement in the last 2 years, during the rewrite, has not been inclusive or transparent in any way. The plan has not addressed any of the issues raised from the last submission. I fear that if pushed through another round of consultation, leading to a referendum will be fruitless, and will cause irreversible damage to this community. I urge that this plan is revised to addresses the issues being voiced by the community.</p>
086	002	Helena Griffiths	Resident		<p>DOCUMENT B (#1 of #3) St. Stephens SA29 (Reg 19 MSDC DPD) I believe the allocation of site SA29 shows the DPD to <u>not</u> be sound.</p> <p>Mid Sussex have failed to declare an interest in land adjacent to site SA29 in Horsted Keynes. Inconsistencies exist in how sustainability assessments (SA) have been made, meaning that their land benefits in the longer term, due to the allocation of SA29 being made in this plan. This enables their previously land locked property to be accessed via this site in the future, resulting in over development of the area (in breach of DP13). This clear conflict of interest should require that the SA be able to stand up to local comparisons and public scrutiny. To date, the assessments fall short of any comparison by those who have</p>

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					<p>knowledge of the sites, and the strong positive bias for the allocation of Site SA29 at St Stephens has led to other alternative sites being repeatedly negatively discriminated against.</p> <p>Positive bias of SA29 includes failure to notify the AONB of the critical risk to the tree belt along the western boundary and access road (with the road being within 2m of the tree trunks with overhanging branches) in breach of DP37 and DP16. Highways have failed to critically assess the parking stress survey, which is in no way a reflection of the reality of the day to day issues on access and parking experienced by the 125 households that are already serviced by the access along the cul-de-sac Hamsland, in breach of DP21 and DP29. The proposed layout in SA29.1 shows the access road bordering the tree belt and boundary to the land owned by MSDC, providing ease of access and spread of development unchallenged in the future. With this representation I submit detailed documentation evidencing the incorrect factual information and inappropriate surveying methods used in the Transport survey submitted by the promoter to incorrectly assess the impact of the development on the residents of Horsted Keynes Attachment A. Furthermore, I believe the owner of Summerlea (directly affected by the allocation of SA29) applied for TPO's to be put on the trees along his boundary with the proposed access to protect this distinctive tree belt, but this was refused by Mid Sussex Tree Officer after the tree officer consulted with the office – surely a conflict of interests.</p> <p>Site SA29 is not accessible without destruction of the tree belt, and will have an immense impact on the character of this part of the village as the proposed access runs along a single track road that already serves 125 houses. A petition with over 350 signatures was submitted to MSDC in opposition to the allocation of this site. No attempt has been made to mitigate the impact on the community showing a lack of community involvement.</p> <p>Discrimination against other sites includes the failure to properly correct factual information in the SA proformas to sites SHELAA 68, 69 and 971, leading to their omission from allocation. If these factual corrections had been made in a timely manner it would have resulted in the sites being considered as reasonable alternatives. No mitigation of the minor negative impacts of these sites have been considered, even though they have been</p>

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					<p>proposed by the site promoter. With this representation I submit detailed documentation evidencing the incorrect factual information on the site proformas for the omitted sites and also the allocated sites as Attachment B.</p> <p>I believe the DPD to <u>not</u> be justified. The strategy has failed to take into account suitable and reasonable alternatives, which have been supported by a strong evidence to be appropriate for allocation. The site SA29 is assessed in the DPD against an 'alternative', SHELAA 216. This is inappropriate as an alternative, as it is a subset of site SA28 that has been allocated. Other suitable, sustainable, deliverable and developable sites, namely SHELAA 68, 69 and 971 should be used in the reasonable alternatives comparison.</p> <p>None of my previous concerns outlined in my Reg 18 comments have been addressed in the DPD, now open for Regulation 19 consultation. The plan is thus not being prepared using correct facts or current information, or in a positive manner. The plan is not sound as Mid Sussex have failed to comprehensively assess other sites within the village that are suitable, sustainable, deliverable and developable.</p> <p>With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites (SHELAA 68, 69 and 971) and also the allocated sites (SA28 and SA29) as Attachment B. This information should be used to update and amend the SA for the specified sites in Horsted Keynes. The transport and Parking Stress Survey for SA29 should be critically assessed by Highways and a site visit should be made to Hamsland to observe the day to day safety issues experienced down this single-track road leading to 125 homes. The promoter should be asked to resubmit a more realistic, appropriate and accurate assessment.</p> <p>There should be recognition of residents opposition to the allocation of SA29, and the 350 residents who signed a petition against the allocation of this site. Mitigation measures on the effect on the community need to be adequately addressed.</p> <p>The AONB should be asked to reassess the impact level of this development given the detrimental impact on the distinctive tree belt along the access to site SA29, and the restricted access.</p> <p>The policy should enable the defence of the boundary with</p>

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					<p>adjoining fields, not enabling access and the spread of unchecked development in to adjoining fields owned by Mid Sussex.</p> <p>The SA for Horsted Keynes sites should be reconsidered, using <u>factually corrected data</u>, in a clear and transparent manner so that meaningful comparisons can be done between sites, to mitigate any perceived discrimination or positive bias of sites as MSDC have a conflict of interest to allocate site SA29.</p> <p>Following the revised SA, appropriate reasonable alternatives should be considered and all appropriate mitigation measures should be assessed.</p> <p>Had the factual corrections been made to the proformas to HK sites in a timely manner (when first submitted to MSDC in Feb 2019), then this revisiting of the site allocations would not need to be made, but sites should not be discriminated against further by dismissing this as a change 'too late in the day'.</p> <p>Please note the ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29 given the number of corrections and amount of justifying evidence is vast, as previous representations in Regulation 18 have not been acted upon.</p> <p>Should the inspector require more detail of the evidence I am happy to provide this information.</p> <p>The ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29, given the number of factual corrections and amount of justification of evidence is vast, as previous representations in Regulation 18 have not been acted upon.</p> <p>I would like to participate in the oral part of the examination to be able to address the issues in a timely manner, and to be available for the inspector to ask questions of me.</p>
086	003	Helena Griffiths	Resident		<p>DOCUMENT B (#2 of #3)</p> <p>Police House Field SA28 (Reg 19 MSDC DPD)</p> <p>I believe the allocation of site SA28 shows the DPD to <u>not</u> be sound.</p> <p>Inconsistencies exist in how sustainability assessments (SA) have</p>

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					<p>been made for sites in Horsted Keynes, due to the SA being undertaken using incorrect factual information. With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites and also the allocated sites as Attachment B.</p> <p>The SA need to be able to stand up to local comparisons and public scrutiny. To date, the assessments fall short of any comparison by those who have visited the sites, leading to other alternative sites being repeatedly negatively discriminated against.</p> <p>The allocation of SA28 was in part due to the failure to notify the AONB of the critical risk to the characterful oak tree which is sites on Birch Grove Road, directly adjacent to the required visibility splays for safe access (with the road being planned to directly abutt the tree trunk, SA28.5, SA28.6, SA28.7) in breach of DP37 and DP16. Thus, Site SA28 is not safely accessible.</p> <p>The allocation of site SA28 will have an immense impact on the character of this part of the village and does not adequately address the mitigation to the impact on the listed building Lucas Farm, directly opposite the site. No consideration has been given to its location of the former buildings associated with the listed building on the site itself (in SA28.2), and the site promoter is suggesting no vegetation buffer, against AONB advice, so breaching DP34.</p> <p>I believe the DPD to <u>not</u> be justified. Their strategy has failed to take into account suitable and reasonable alternatives, which have been supported by a strong evidence base to be appropriate for allocation. The site SA28 is assessed in the DPD against an 'alternative', SHELAA 216. This site is inappropriate as an alternative, as it is a subset of site SA28 that has been allocated. Other suitable, sustainable, deliverable and developable sites, namely SHELAA 68, 69, and 971 should be used in the reasonable alternatives comparison.</p> <p>None of my previous concerns outlined in my Reg 18 comments have been addressed in the DPD, now open for Regulation 19 consultation. The plan is thus not being prepared using correct or current factual information, or in a positive manner. The plan is</p>

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					<p>not sound as Mid Sussex have failed to comprehensively assess other sites within the village that are suitable, sustainable, deliverable and developable.</p> <p>With this representation I submit detailed documentation evidencing the incorrect factual information on the site proformas for the omitted sites (SHELAA 68, 69 and 971) and also the allocated sites (SA28 and SA29) as Attachment B. This information should be used to update and amend the SA for the specified sites in Horsted Keynes.</p> <p>The AONB should be asked to reassess the impact level of this development given the detrimental impact on the distinctive tree that will be critically affected by the visibility spays needed to give safe access to site SA28.</p> <p>The SA for Horsted Keynes sites should be reconsidered, using <u>corrected factual data</u>, in a clear and transparent manner so that meaningful comparisons can be done between sites. Following the revised SA, appropriate reasonable alternatives should be considered and all appropriate mitigation measures should be assessed.</p> <p>Had the factual corrections been made to the proformas to HK sites in a timely manner (when first submitted to MSDC in Feb 2019), then this revisiting of the site allocations would not need to be made, but sites should not be discriminated against by dismissing this as a change 'too late in the day'.</p> <p>Please note the ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29 given the number of corrections and amount of justifying evidence is vast, as previous representations in Regulation 18 have not been acted upon. Should the inspector require more detail of the evidence I am happy to provide this information.</p> <p>The ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA28 given the number of corrections and amount of justification of evidence is vast, as previous</p>

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					<p>representations in Regulation 18 have not been acted upon.</p> <p>I would like to participate in the oral part of the examination to be able to address the issues in a timely manner, and to be available for the inspector to ask questions of me.</p>
086	004	Helena Griffiths	Resident		<p>Document B (#3 of #3)</p> <p>Omission of Jeffreys Farm sites 68, 69 and 971 (Reg 19 MSDC DPD)</p> <p>I believe the failure of consistency and use of factually incorrect information within the Sustainability Assessment (SA) of sites in Horsted Keynes shows the DPD to <u>not</u> be sound, and is in breach of Policy SA11.</p> <p>Why, in Horsted Keynes, is a green field site on a medieval field system which would severely impact a large number of residents (125 households) living down a cul-de-sac, with no existing access, being allocated, over a brown field site with existing tarmacked access? This is a question many residents of Horsed Keynes are asking.</p> <p>Inconsistencies exist in how the SA have been made, resulting in the inappropriate allocation of sites SA28 and SA29 over other sites that are equally appropriate for allocation (notably SHELAA 68, 69 and 971).</p> <p>The SA should be able to stand up to local comparisons and public scrutiny. To date, the assessments fall short of any comparison by those who have visited the sites, and the strong positive bias for the allocation of Site SA29 at St Stephens (where Mid Sussex has a conflict of interest) has led to other alternative sites being repeatedly negatively discriminated against, especially SHELAA 68, 69 and 971.</p> <p>In regard to SHELAA 971, the Built-Up Area Boundary does not reflect the current built development adjacent to the site, the boundary needs revision to reflect the true built form of Horsted Keynes.</p> <p>The failure to promptly correct factually incorrect information in the SA proformas to sites SHELAA 68, 69 and 971, has led to their omission from allocation. If these corrections had been made in a</p>

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					<p>timely manner it would have resulted in the sites being considered as reasonable alternatives. No mitigation of the minor negative impacts of these sites have been considered, even though they have been proposed by the site promoter. The SA have not used current information available, including information referred to by the promoter in association with recent planning applications to assess the SHELAA 68, 69 and 971 sites.</p> <p>With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites and also the allocated sites as Attachment B.</p> <p>AONB assessment of all sites was a desk top exercise and does not adequately address information that has been omitted in the site SA proformas.</p> <p>I believe the DPD to <u>not</u> be justified. Their strategy has failed to take into account suitable and reasonable alternatives, which have been supported by a strong evidence base to be appropriate for allocation. The allocated sites SA28 and SA29 are assessed in the DPD against an 'alternative', SHELAA 216. This site is inappropriate as an alternative, as it is a subset of site SA28 that has been allocated. Other suitable, sustainable, deliverable and developable sites, namely SHELAA 68, 69, and 971 should be used in the reasonable alternatives comparison.</p> <p>The allocation of SHELAA 68, 69, and 971 would go a long way to positively impact the communities' health, social and cultural well-being, as a large purposeful recreation space was part of a previous planning application, in stark comparison to the allocated sites who have token green space planned.</p> <p>None of my previous concerns outlined in my Reg 18 comments have been acknowledged in the summary document, or addressed in the DPD, now open for Regulation 19 consultation. The plan is thus not being prepared using correct or current information, and in a positive manner. An unwillingness to add or remove sites, or to correct basic factual errors shows the plan to have been prepared with no concern for a duty to cooperate. The plan is not sound as Mid Sussex have failed to comprehensively assess other sites within the village that are suitable, sustainable, deliverable</p>

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					<p>and developable.</p> <p>With this representation I submit detailed documentation evidencing the factually incorrect information on the site proformas for the omitted sites (SHELAA 68, 69 and 971) and also the allocated sites (SA28 and SA29) as Attachment B. This information should be used to update and amend the SA for the specified sites in Horsted Keynes. The transport and Parking Stress Survey for SA29 should be critically assessed by Highways and a site visit should be made to Hamsland to observe the day to day safety issues experienced down this single-track road leading to 125 homes. The prompter should be asked to resubmit a more realistic, appropriate and accurate assessment.</p> <p>There should be recognition of residents opposition to the allocation of SA29, and the 350 residents who signed a petition against the allocation of this site. Mitigation measures on the effect on the community need to be adequately addressed.</p> <p>The AONB should be asked to reassess the impact level of this development given the detrimental impact on the distinctive tree belt along the access to site SA29, and the restricted access.</p> <p>The policy should enable the defence of the boundary with adjoining fields, not enabling access and the spread of unchecked development in to adjoining fields owned by Mid Sussex.</p> <p>The SA for Horsted Keynes sites should be reconsidered, using <u>factually corrected data</u>, in a clear and transparent manner so that meaningful comparisons can be done between sites, to mitigate any perceived discrimination or positive bias of sites as MSDC have a conflict of interest to allocate site SA29.</p> <p>Following the revised SA, appropriate reasonable alternatives should be considered and all appropriate mitigation measures should be assessed.</p> <p>Had the factual corrections been made to the proformas to HK sites in a timely manner (when first submitted to MSDC in Feb 2019), then this revisiting of the site allocations would not need to be made, but sites should not be discriminated against further by dismissing this as a change 'too late in the day'.</p> <p>Please note the ability of this representation to cover succinctly</p>

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					<p>all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29 given the number of corrections and amount of justifying evidence is vast, as previous representations in Regulation 18 have not been acted upon. Should the inspector require more detail of the evidence I am happy to provide this information.</p> <p>The ability of this representation to cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change is difficult for Policy SA29, given the number of factual corrections and amount of justification of evidence is vast, as previous representations in Regulation 18 have not been acted upon.</p> <p>I would like to participate in the oral part of the examination to be able to address the issues in a timely manner, and to be available for the inspector to ask questions of me.</p>
087	001	Reg Stewart	Resident		<p>Letter dated 5th December (entered from written form)</p> <p>I appreciate that HKPC has an impossible task to draw up a village plan that will please everyone.</p> <p>For what it is worth, here are my views:</p> <ol style="list-style-type: none"> 1. No 'site' in the village that involves the construction of more than 10-12 houses is feasible due to the lack of good infrastructure – they can't cope now. 2. If Jeffreys is a brown field site was chosen (tho I understand that it has been rejected by MSDC due to being in AONB? Is that correct?). If it was chosen the access to the site should be on the existing track, not across a green field to Jeffreys (that defeats the rationale of building on a brown field site, surely?). 3. It is no point in having x% 'affordable' even with that "discount". Many local people – especially the young – would not be able to afford a house here. 4. There is a need for housing in HK – where the best I don't know, but since the 'Thatcher' era, when local 'council houses' were sold – there has been a need for 'council housing' for local HK residents, or would be residents. However, I doubt if

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					<p>developers would go down that road.</p> <p>5. Whatever the outcome – I just hope all concerned can discuss – agree or disagree – in a civilised and polite manner. We don't want the housing issue to tear HK apart. I wish the HKPC all the best in dealing with this mammoth task.</p>
088	001	Paul Fairbairn	Resident		<p>Having read the Neighbourhood Plan Pre-Submission Draft (NPPSD), I have to record my strong sense of disappointment at the unfulfilled potential and a vital opportunity missed - unless the proposals are revised significantly prior to submission.</p> <p>In Section 2, the NPPSD sets out the local context to the plan. Much of this is captured well, but the narrative is 'sugar-coated' in that it singularly fails to mention the spiral of decline that is best reflected in the number of commercial and social amenities that have ceased operating in the village over the past two or three decades:</p> <ul style="list-style-type: none"> • Mini-supermarket (Sayers and Carter); • Local butcher (Tony Maynard); • Hair-dresser (above butcher's shop); • Car body shop (now Hillcrest houses); • Local garage and petrol station (Crown Garage - now houses); • Doctor's surgery at Martindale Centre; • Village post office - virtually dead despite strenuous efforts to maintain it. <p>Some of this reflects demographic changes in our habits and desires, but some reflects a lack of sustainable growth to refresh and maintain the patronage that makes these amenities viable in the face of new competition.</p> <p>As an example of the wishful thinking in the NPPSD, a stranger reading Paragraph 2.5 would interpret this to depict a vibrant village with a 'flourishing' set of activities, but whilst our lovely village has much to commend it, the reality is somewhat less rosy:</p>

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					<ul style="list-style-type: none"> We have just a general store left, and paragraphs 2.20-2.22 spell out the risk that this vital amenity might not survive for much longer; We do indeed have playing fields for cricket and football, but the cricket club is struggling to field one team, let alone two as they did in the past, and the football club is at best dormant (if not already dead), having failed to field a team this past season; We have fewer events within the village now than we did, and many clubs and societies struggle to attract younger families to participate. I can say this from a position of direct experience as current chairman of the Horsted Cahagnes Society - your striking cover picture shows over 130 people, including many young families with children, participating in the twinning weekend 10-15 years ago - this year we had about 70 participating, and we are all too aware of our ageing population demographic. <p>Paragraph 2.6 tellingly remarks that 'many retired people enjoy the peace and quiet of Horsted Keynes' - but as someone approaching retirement, I don't want Horsted Keynes to be so peaceful and so quiet when I retire that it has lost the local amenities that make this village what it is.</p> <p>Your analysis in paragraph 2.14 is spot on and should be a 'call to arms' - it highlights the challenges that we face as a village if we accept a forever ageing population and do not implement policies in this Neighbourhood Plan to do more to retain young families within the village.</p> <p>Section 2 concludes by highlighting in paragraphs 2.30-2.33 the importance of the NPPSD being "in general conformity" with the Local Plan and Emerging District Plan. There is one glaring contextual omission that does not appear anywhere in the NPPSD, which MSDC's Objective Assessment of Need (OAN), indicating that Horsted Keynes might be expected to accept up to 126 additional dwellings over the 15 year life of this Plan. Whilst this is an upper bound, and there are other factors that we can and should take into account, this is an important benchmark in terms of judging the acceptability, credibility, sustainability and</p>

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					<p>seriousness of our Neighbourhood Plan.</p> <p>Section 3 of the NPPSD contains excellent material, namely:</p> <ul style="list-style-type: none"> • A succinct summary of the challenges we face in paragraph 3.1; • A very clear and apt 2031 Vision for Horsted Keynes in paragraph 3.2; and • A very pertinent set of Objectives in paragraph 3.3. <p>In Section 4, much of the page is given over to the pre-NPPF Local Plan which effectively maintained a presumption against development. The NPPF has sought to re-balance the planning system with a presumption in favour of sustainable development and it encourages Neighbourhood Plans to define where the BUAB should be. It is therefore disappointing in paragraph 4.4, given the Vision and Objectives set out so recently in Section 3, to see the 2004 BUAB retained, albeit with two minor developments tinkering at its margins.</p> <p>If we are to stand any chance of meeting our own Vision and Objectives, let alone making more meaningful progress towards our OAN, we either need to:</p> <ul style="list-style-type: none"> • Extend the BUAB more than has been accepted so far in Policies HK18 and HK20; and/or • Provide more housing on sites within the fixed 2004 BUAB. <p>Clearly there are very limited opportunities for development within the BUAB. However there is one highly sustainable and therefore surprising omission from the process that we do not appear to have considered - that is the possibility of providing a blend of suitable housing on the now defunct football pitch, whilst retaining the children's play area and the tennis courts. A replacement football pitch could be provided, if still required, on the covenanted Jefferies Farm field. We might also explore whether we could make a case for a new, more fit for purpose (cf. Scaynes Hill) Village Hall adjacent to the car park as a part of such a development.</p> <p>Section 5 is by and large good stuff - sensible policies to control the quality of development. The one surprising shift, given the</p>

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					<p>requirement for more smaller houses, is that Policy HK2 provides for 50% one and two bedroom houses whereas SHMA recommends 75% for Mid Sussex given the shortage of suitable affordable housing.</p> <p>Section 6 is generally sensible in its intents - my only comment would be that the case for retaining all of the Recreation Ground as open space will be very much weaker if it is poorly used - and perhaps already is!</p> <p>Sections 7 and 8 are both very sensible.</p> <p>Section 9 is sadly pathetic. Having done all the groundwork in setting out what the village needs, the Parish Council has provided no leadership in the face of two competing NIMBY groups and, in my opinion, has 'bottled it'. If the Westall House proposals are, as rumoured, no longer admissible (and they never were doing much for Horsted Keynes residents), we have a princely total of 16 new dwellings proposed over the next 15 years.</p> <p>Of these 16 new dwellings:</p> <ul style="list-style-type: none"> • 10 dwellings on the 0.26ha Police House Field feels to be far too dense if this has also to include an access road and off-street parking. According to Policy HK2, this site would deliver 5 one and two bedroom houses if 10 dwellings were indeed possible - it looks more likely that it would be about half of that figure. • 6 dwellings on the 0.7ha Jefferies Farm Buildings site feels too generous - this would infer fewer larger houses rather than the Policy HK2 split, on the somewhat weak contention that the access road could not handle more traffic (or be adapted to enable it so to do). <p>It would therefore appear that, as currently drafted, the NPPSD is more likely to deliver about 12 new dwellings, of which perhaps 3 or 4 might be one or two bedroom dwellings. When adding the 14 completed or in the planning pipeline, this total of 26 is so far short of the OAN of 126 new dwellings over the 15 year period as to be risible. We surely have to get to 70 or 80 new dwellings over this period to be credible, which would deliver 35 to 40</p>

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					<p>affordable homes using Policy HK2, or 50 to 60 affordable homes using the SHMA ratios. On average, that only represents 5 or 6 new dwellings per annum over the life of the Neighbourhood Plan, but it would make a real difference and would bring fresh blood into the village, as well as providing the downsizing opportunities within the village for retired 'empty nesters'.</p> <p>We have set a clear Vision and appropriate Objectives in the NPPSD - if we are to realise these the Parish Council has to go back and grasp some nettles here, unpopular though we know that will be with our two competing NIMBY groups. I cannot see that a sufficiently safe access scheme can ever be developed for the Old Rectory site off Church Lane, so we come back to one or some of:</p> <ul style="list-style-type: none"> • Jefferies Farm fields - these sites can be made to have good access onto Sugar Lane and/or Keysford Lane and are within easy walking distance to the village centre. A well designed development here is a much more defensible boundary against future development than a hedgerow alongside Sugar Lane - that is an open invitation to a developer; • Constance Wood field - perhaps more of a challenge due to the access constraints, but one demolished bungalow at the Lewes Road end of Hamsland would give a developer easy access to this site without adding to traffic on Hamsland. This site also has easy walking access to the village centre. • The new proposal on the east side of Birch Grove Road up to Westall House - this may have a number of attractive features for the village if designed in a way that can limit the scope for subsequent development behind it. Can this late entrant into the mix be included at this stage - is this in the same category as the proposals behind St Stephen's Church, which I presume represents the "12 dwellings in the planning pipeline"? • The possibility of developing on the Recreation Ground site, perhaps as part of a village masterplan including a new football pitch on Jefferies farm field and a new Village

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					<p>Hall part funded by the developer as a planning gain negotiation. This is highly sustainable as a site, but changes the open nature of part of the village centre quite markedly.</p> <p>I fully appreciate the difficult job that the Parish Council has had as it has prepared this NPPSD, which has not been helped by some perhaps unwise actions by a number of parties involved in the various factions that formed.</p> <p>My strong advice would be to ensure that we have Submission Draft Neighbourhood Plan that does not pull its punches and that provides clear leadership and sets out a Plan that will truly and confidently meet the excellent Vision and Objectives that we have set out so articulately. That will require quite a bold change from the sadly inadequate conclusions that we have drawn at present. If we don't make that change, I fear that we will lose control of this process - which cannot be in the long-term interests of the village and is even less likely to enable the achievement of our Vision and Objectives.</p>
088	002	Paul Fairbairn	Resident		<p>HORSTED KEYNES NEIGHBOURHOOD DEVELOPMENT PLAN: DRAFT FOR CONSULTATION (Regulation 14)</p> <p>Consultation response by Paul Fairbairn</p> <p><u>Overarching Comments</u></p> <p>A long process with much to commend The Foreword sets out very clearly the lengthy process with which the village has engaged since 2008 to seek to develop a compelling plan for Horsted Keynes, initially through the informal Village Plan, and since 2012 via the Neighbourhood Plan process. This process started 12 years ago, and rightly was set up as an objectives-led process, seeking to identify what stakeholders in the village wanted, and this continued through many of the earlier consultations, as set out in HKNP paragraph 1.16 et seq. Chapter 10 of the draft lists many of the items that have been raised during the process.</p> <p>There is much in the Draft Plan to be commended, and in large measure I concur with the Policies that the Draft Plan sets out – where I have specific comments on their drafting, I will pick this</p>

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					<p>up below. I particularly welcome the clear attention now paid in the draft to the provision of community-led truly affordable housing that can be maintained in perpetuity for community benefit.</p> <p><u>A key concern – the shift from an objectives-led approach to a specific solution</u></p> <p>However, my overarching concern is that the process changed several years from being objectivesled, looking for win-win solutions that could engender broad community support. The broadly based Steering Group, the members of which are rightly commended for their efforts in the Foreword, was narrowed from a mix of Parish Councillors and community members to Councillor-only. The narrowly based Group then embarked on its first ill-conceived move, which was to engage in wishful thinking, and generate a Draft Plan that significantly under-delivered against Horsted Keynes’ obligations to deliver additional homes. That led, with predictable inevitability, to the failed draft Plan that had to be withdrawn in 2018.</p> <p>The next regrettable strategy has been to drive through a narrowly-based prescribed solution (SA28 and SA29) – a specific win-lose solution that has lost the buy in of a large number of villagers. This ultimately threatens the potential to secure agreement to the current Draft Plan at a village referendum. That will put us in a bad place.</p> <p><u>Abdication of leadership by HKPC – a passive approach</u></p> <p>What is particularly disappointing to me is the abdication of leadership by HKPC in the promotion of this particular solution. HKPC has chosen to take a passive role, choosing to hide behind MidSussex’s Site Allocation DPD process, rather than pro-actively leading a critical, creative discussion within the village that truly engaged with Horsted Keynes’ residents in order to identify a win-win solution that could generate broadly-based consent. The strategic policy from MSDC that HK must follow is Policy DP6 of the District Plan, which establishes the requirement for at least 69 new homes in Horsted Keynes parish from 2014 to 2031. We did not have to choose to follow the SADPD – we could have had primacy in determining where those new homes should ideally be</p>

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					<p>located in our village, as set out clearly in Paragraph 30 of the NPPF, February 2019.</p> <p>There appears to have been no appreciation that creative planning can seek to stitch together an apparently disconnected set of individual objectives to create a plan that engenders broad support. These points aren't 'cheap shots' criticising people who have volunteered an immense amount of their time on our behalf. It is exasperation that we are where we are now, through this lack of creative leadership. I offered a straw man, a thought piece, to HKNP Steering Group over a year ago which illustrated one way in which such a multi-stakeholder discussion might evolve, but the proposal was met with a focus that was all 'management', on not disrupting the programme, rather than engaging in any 'leadership' at a late stage to seek to generate a plan that might command broader support across the village.</p> <p>In one way I hope that I am wrong – I hope that we can get a Neighbourhood Plan that succeeds at referendum, but I fear that the mobilisation of opposition to SA29, Land South of St Stephen's Church is such that we will end up with a failed Plan.</p> <p><u>Consultation – a genuine process or a box ticking exercise?</u></p> <p>I also wonder how much this Consultation will actually change anything - how much focused attention will be given to the points that are raised? It is for that reason that this response is so eleventh hour!</p> <p>I submitted a thorough and reasoned response to the SADPD Consultation operated by MSDC, but their approach was to chop up parts of my response into a series of pigeonholes that they established, to apparently disregard anything that didn't fit in one of their pigeonholes, and to move on. I have not yet seen any reasoned response from MSDC to any of the points raised, despite the process having moved on inexorably to the next stage (Regulation 19) with no deviation in Horsted Keynes from the pre-ordained path.</p> <p>My consultation response to MSDC is attached as Appendix 1 to this response, and is equally applicable to this consultation, as it goes to the heart of land use planning in Horsted Keynes, in the hope that HKPC will change its approach and decide that it wishes</p>

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					<p>to assert primacy in that regard.</p> <p>The principal point that I was raising in Appendix 1 was that MSDC had prematurely screened out sites, on the basis of irrational assessments, such that the shortlisted sites in the DPD would only deliver the required number of new homes in Horsted Keynes, i.e. contrary to MSDC's own guidance that this process enabled the assessment and prioritisation of competing sites. In reality, there was no choice in play for Horsted Keynes in the SA DPD Consultation, only a prescribed solution.</p> <p><u>Jeffreys Farm Sites should be included</u></p> <p>For clarity, I am not pre-judging that a Jeffreys Farm site would be included in the conclusion of a creative search for a win-win solution within the village, but I do believe strongly that there are many reasons why these sites should be within our list of choices. I have set out in Appendix 1 why I think the Jeffreys Farm sites should have been included in MSDC's SADPD consultation, and I believe should be within our HKNP considerations, particularly if MSDC is set on a path in their SADPD that will not now change.</p> <p>HKPC acting passively on a matter of such importance, declaring that this is MSDC's decision that we are following, when we know the concerns that exist within the village regarding S29, feels to me to be wholly inadequate.</p> <p>The defence for screening out the Jeffreys Farm sites is that they have been assessed as having a high impact on the AONB. Every site around Horsted Keynes that has been considered in this process has an impact on the AONB. When one looks behind the adverse conclusion about the Jeffreys Farm sites, it is my opinion, after 35 years experience working in the planning of major projects, that the evidence simply does not appear to be sufficiently robust to underpin that conclusion. These sites should still be in the mix.</p> <p><u>MSDC SDPD runs counter to many of the Objectives and Policies in HKNP</u></p> <p>We appear passively to be accepting MSDC site allocations, when the effects of SA29, Land south of St Stephen's Church seem to cut across some of these Objectives and Policies. Why can we not</p>

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					<p>identify sites that are led by and actually support our Objectives and Policies, rather than accept sites that are disadvantageous to the village?</p> <p><u>Specific comments on the Draft Plan</u></p> <table><tr><th>Paragraph</th><th>Comment</th></tr><tr><td>1.10</td><td><p>NPPF Paragraph 30:“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict”</p><p>HKPC can and should take the prime role in determining where development should take place in Horsted Keynes by defining this in the HKNP, not accepting MSDC’s decisions on this.</p></td></tr><tr><td>1.12</td><td><p>“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.”</p><p>This reinforces that MSDC accepts that HKPN could define the allocation</p></td></tr><tr><td>2.36</td><td><p>The concerns that villagers have are broader than ensuring that existing parking on narrow roads is not reduced as a result of development, it is that additional traffic in the wrong location will lead to safety risks as a result of the cars that are traditionally parked along these roads. Many of the roads in the village are effectively reduced to single track roads by parked vehicles, if we are lucky with an opportunistic gap to permit passing. We are committing rightly not to reduce existing on-street parking, but we have to consider the effect of additional traffic generated by inappropriatelylocated development on our narrow roads. This isn’t a traditional city centre congestion issue, that additional traffic causes increased delay on a two-way road – this is a safety issue of cars coming around blind bends and finding themselves</p></td></tr></table>	Paragraph	Comment	1.10	<p>NPPF Paragraph 30:“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict”</p> <p>HKPC can and should take the prime role in determining where development should take place in Horsted Keynes by defining this in the HKNP, not accepting MSDC’s decisions on this.</p>	1.12	<p>“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.”</p> <p>This reinforces that MSDC accepts that HKPN could define the allocation</p>	2.36	<p>The concerns that villagers have are broader than ensuring that existing parking on narrow roads is not reduced as a result of development, it is that additional traffic in the wrong location will lead to safety risks as a result of the cars that are traditionally parked along these roads. Many of the roads in the village are effectively reduced to single track roads by parked vehicles, if we are lucky with an opportunistic gap to permit passing. We are committing rightly not to reduce existing on-street parking, but we have to consider the effect of additional traffic generated by inappropriatelylocated development on our narrow roads. This isn’t a traditional city centre congestion issue, that additional traffic causes increased delay on a two-way road – this is a safety issue of cars coming around blind bends and finding themselves</p>
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					increasingly in a head to head situation with a vehicle (or vehicles) coming in the opposite direction. This will lead to more reversing, which is inherently less safe, let alone the increased risks to people seeking to cross these busier roads with poor visibility between parked cars.
					<p>3.3</p> <p>“Objective 5: Reduce the negative impacts of traffic and roadside parking on the village and encourage safe walking and cycling.”</p> <p>The substantial development proposed on SA29, Land south of St Stephen’s Church will exacerbate rather than reduce these negative impacts. The current proposal runs counter to our declared objective.</p>
					<p>4.3</p> <p>“This Plan does not propose to amend the BUAB for Horsted Keynes, but confirms that set out in the District Plan policy DP12 and the Policies Map and shown in Map B below.”</p> <p>MSDC’s BUAB for Horsted Keynes is irrational. The housing to the south of the village along and to both sides of Treemans Road should be included within the BUAB to the village boundary at the 30mph sign, in the same way that the strip of houses along Church Lane is included to the north. At present the arbitrary boundary at the south of the village can be used to reject plans for development on Jeffreys Farm buildings, when that site is actually contiguous with existing housing.</p>
					<p>4.4</p> <p>Policy HK1 boldly states that “New development in Horsted Keynes parish will be focused within the built-up area boundary (BUAB) of Horsted Keynes village as identified on the Policies Map, in order to promote sustainable development of the village and to safeguard the nationally important landscape of the High Weald AONB.” That is a very laudable policy, but none of the sites that have been considered in this process actually comply with that headline policy. Our flagship policy</p>

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					therefore relies on a caveat to enable SA28 and SA29 to be included. Is this the right approach? Have we actually explored any potential sites within the BUAB (whether extended or as currently drawn)? If not, should we? If we think the major development is bound to be contiguous with but outside our current BUAB, should the policy be reworded so that this flagship Policy leads with a clear statement that covers the bulk of our site allocation, rather than everything being delivered via one caveat or another?
					4.4 "Proposals should also be supported by a robust assessment of the impact of the proposal on the local highway network and include appropriate mitigation measures (to) secure the safe, free flow of traffic, as necessary." With the best will in the world, it is difficult to conclude that SA29 would actually secure rather than frustrate "the safe, free flow of traffic" that the draft HKNP sets out as an intrinsic and very reasonable part of HK1. This is a part of the policy that gives added weight to the case for the Jeffreys Farm sites being included in our available sites within the HKNP, as their location to the west of but contiguous with the village, will minimise the traffic impact on the village, given that most of our traffic heads south and west to Haywards Heath, Lindfield, the M23, etc.
					5.10 Policy HK2 – I strongly support this. Well done for beefing this up.
					5.17 Policy HK3 – I strongly support this. Well done for being clear about what the real need is within the village.
					5.22 Policy HK4 – I strongly support this. Good design makes a huge difference.
					5.22 Policy HK4 "respecting the natural contours of the site and protecting and sensitively incorporating well-established natural features of the landscape

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					<p>including trees, species-rich hedgerows and ponds within the site;"</p> <p>There is a real risk that SA29 will also frustrate this part of Policy HK4 if access to the site requires the removal of the row of mature trees along part of the southern boundary. How many infringements of our HKNP Policies can this MSDC site support before it becomes a bad choice for HK to accept?</p>
					<p>6.5</p> <p>"Care is needed where there are old or derelict structures and which include (or are close to) features such as mature trees, ponds, ditches and field boundaries, where protected species may be present. It is important that their protection is a central consideration at the detailed planning stage. Early reference to biological records would clarify where these issues may be acute."</p> <p>Can we be confident that the SA29 site will not fall foul of the sensible and reasonable expectation that is set out in the draft HKNP if providing access to this site requires felling a row of mature trees along its boundary?</p>
					<p>6.13</p> <p>Policy HK9 – "...and wood fuel systems..." I suggest deleting these few words as a policy objective for new build. Many existing homes will continue to burn wood, but we should be encouraging all new build to heat their homes with low energy and renewable technologies, such as heat pumps, as set out in paragraph 6.18. Biomass is a renewable technology option, but the current wording in HK9 appears to promote this to be the lead option.</p>
					<p>8.1</p> <p>Transport: "maintaining and improving the existing infrastructure is of paramount importance in providing a safe and comfortable environment for residents of all ages."</p> <p>I have concern that the traffic generated by the extent of development currently proposed by MSDC in SA29 will make Hamsland less safe and less comfortable, therefore further frustrating and</p>

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						conflicting with HKNP.
					8.2	<p>"The extent to which this can be achieved through the neighbourhood planning process is limited to those issues which can be governed by land use planning matters."</p> <p>Spot on – I fully concur. That is why it is so important that we use the power that the NP process invests in a local community to ensure that we have primacy and take the lead in defining where development should best be located in HK, not MSDC. We live here, we know what the pinch points and challenges are. We should control this choice for this sort of reason.</p>
					8.3	<p>"Nevertheless, it is intended that development should add positively to this infrastructure where it is practicable to do so, and avoid unacceptable burdens on existing networks. This is an essential component of sustainable development."</p> <p>These are our words in our draft HKNP. There is understandable concern by those who currently live in Hamsland and Challoners, shared by other villagers such as myself who do not live there, that the extent of development proposed in SA29 will place "unacceptable burdens on existing networks". If we are prepared to accept sites that seem to conflict with the words in our draft HKNP, should we change the words so that they are not merely lip-service that is instantly contradicted, or should we change our site allocation to sites that support our aspirations? I'd prefer the latter.</p>
					8.4	<p>"This has included concern both about losing any of the existing parking areas within the village as a result of development and that new development could exacerbate the existing problem by resulting in additional parked cars on existing narrow village streets, many of which do not have footways."</p> <p>As with paragraph 2.36, whilst the concerns listed above may well be valid, I think there is a further</p>

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					concern that the additional traffic generated by inappropriately located development will cause safety concerns on narrow roads with existing onstreet parking. In the limit, that could lead to the introduction of parking restrictions on safety grounds, which would then directly frustrate the aspirations expressed in paragraph 8.2, i.e. that we should not lose existing parking as a result of development. We should not allocate sites that we think may increase this risk. To me this is one of the strong reasons for the Jeffreys Farm sites being in our mix.
					8.4 Policy HK16 – this is too narrowly drawn in limiting itself to loss of off-road parking places. This should be broadened to cover both on-street and off-street parking, but we need to mean what we say. There must be a real risk that the scale of development currently proposed in SA29 will eventually lead to the introduction of on-street parking restrictions on Hamsland on safety grounds between Lewes Road and Challoners. Are we prepared to countenance this? It feels to me that, at the moment, this is being swept under the carpet as an ‘inconvenient truth’ – we should not accept that.
					8.12 Policy HK17 – I strongly support this, but I am concerned about the restricted width of the access that is available to SA29. Policy HK17 states: “New developments shall provide footways serving the new dwellings that are of sufficient width to accommodate at least two persons walking abreast and are suitable for wheelchairs, prams, pushchairs and mobility scooters, except where a narrower footway may exceptionally be justified by an overriding need to maintain the existing character or appearance of a street or lane.” Can SA29 comply with this Policy in the restricted width available for access, or is this another Policy in HKNP that will be broken if SA29 is developed?

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					Why not have sites in our allocation that we know can comply with our Policies?
					<p>9.6</p> <p>"The Neighbourhood Plan's housing strategy is to rely on the MSDC Site Allocations SA28 and SA29 to meet its residual housing requirement, as set out in District Plan policy DP6 and, in the event of any shortfall, consider whether any additional site allocation is necessary to meet the DP6 strategic requirement."</p> <p>I strongly disagree with this approach as I fear that we are passively accepting poor choices for our village, which we will have to live with forever. This is our opportunity to use our local knowledge to build a consensus for sites that collectively give rise to less concern, and that will serve us well for the future. And yes, we will have to do this all again in 5-10 years time, so we might also want to give at least some thought about where this village is likely to need to develop beyond this immediate horizon. With a medium to long term view creating some hazy backdrop to our short to medium term HKNP, we might well favour some quadrants of the village more than others.</p>
					<p>9.10</p> <p>"The Sustainability Appraisal (supplemented by a detailed site assessment using the same criteria as the DPD) confirms that the allocations proposed in the Site Allocations DPD (Sites SA28 and SA29) are the two most sustainable sites for housing development in Horsted Keynes and that there are no additional sites which could be allocated without significant harm to planning interests, in particular the character and appearance of the High Weald AONB and achieving safe and convenient vehicular access to any additional allocation site."</p> <p>As mentioned in my introductory comments, this goes to the heart of my concerns about the current allocation. I am not 'an innocent abroad' in this space, and I have serious concerns that total reliance is being placed on the AONB assessment to</p>

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						screen out otherwise-attractive sites, when the evidence base underpinning the adverse conclusion does not appear to provide sufficient rationale to support that conclusion. This is fundamental. The Jeffreys Farm sites assessment need a careful, informed, independent review. In my judgement, some of the Jeffreys Farm sites should be in the HKNP mix. Further detail regarding my concerns on this are set out in Appendix 1. I did not receive any feedback from MSDC in response to my SADPD consultation concerns on this, but these should still be relevant considerations for HKPC when reviewing the HKNP consultation responses.
088	003	Paul Fairbairn	Resident		Appendix 1	
					Comments on the Horsted Keynes sites within the MSDC SADPD	
					Relevant District Plan Policy DP4: Housing	
					Relevant Site Allocation Policy SA11: Additional Housing Allocations	
					Preface to this Submission	
As a recently retired professional that has spent 35 years working in the planning stage of major national infrastructure projects, including preparing and giving evidence for major public inquiries, I strongly support the DP and SADPD process as an essential means to underpin necessary sustainable development of additional housing. I therefore support the allocation of land in Horsted Keynes for additional housing for the reasons set out for the Horsted Keynes sites in the Sustainability Appraisal Conclusions, Chapter 9. However, the Sustainability Appraisal is limited to a shortlist of sites that have been screened in the SADPD Site Selection Paper 3: Housing Sites, dated October 2019. The detailed site pro-formas, are contained in Appendix B, which also conclude whether a particular site is to be screened out and taken no further, or whether the site is to be taken on to the Sustainability Appraisal. This screening process is therefore critical – and I						

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					<p>believe that the judgements that have been made at this critical stage are demonstrably flawed and have led to a sub-optimal shortlisting of sites within Horsted Keynes. I do not live close to any of the sites in question, so my observations are based on a professional, objective view of wanting the best, most sustainable development for Horsted Keynes - my concern at present is that the current site allocations in the DPD will not achieve that.</p> <p><u>Introduction</u></p> <p>This submission relates to the shortlisting and appraisal of prospective housing sites within Horsted Keynes (HK). The Sustainability Appraisal (SA) is the most detailed assessment of prospective sites that has been undertaken in MSDC's SADPD process – and was carried out following a three-stage sieving process to filter the number of sites down to a manageable shortlist. This submission reviews the conclusions of the SA for the HK sites and reflects this learning back to the necessarily lighter-touch appraisals that were undertaken on the larger number of sites under consideration at Stage 3 of the site allocation process. This submission contends that, unfortunately, two prospective sites in HK were demonstrably filtered out prematurely at Stage 3 and would have scored equally or better than those taken to SA, thereby leading to a sub-optimal site allocation for Horsted Keynes in the DPD.</p> <p><u>Extracts from the Sustainability Appraisal for sites in Horsted Keynes</u></p> <p>The Sustainability Appraisal (SA) sets out in Figure 13 that it has assessed 47 sites that remained following the screening process undertaken in Site Selection Paper 3, and it sets out in Paragraphs 6.39-40 that it has categorised these screened sites into:</p> <ul style="list-style-type: none"> ▪ 20 Sites that Perform Well. ▪ 16 Sites that Perform Poorly. ▪ 11 Marginal. <p>Of the 20 'Sites that Perform Well' and are proposed for development in the SADPD, 2 are in Horsted Keynes:</p>

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					<p>SHLAA Site 184: Land south of St. Stephens Church, Hamsland</p> <p>SHLAA Site 807: Land South of The Old Police House, Birchgrove Road, Horsted Keynes</p> <p>Of the 16 'Sites that Perform Poorly', 1 is in Horsted Keynes. It appears to have been categorised as such in order to be excluded as it lies wholly within and is subsumed by SHLAA Site 807:</p> <p>SHLAA Site 216: Land at Police House Field, Birchgrove Road, Danehill Lane</p> <p>Table 15 of the SA clearly indicates the generic positive benefits of suitable, sustainable housing development in HK. All 3 sites assessed in HK are assessed as delivering the following benefits:</p> <p>Major positive effects are anticipated in relation the housing and regeneration SA objectives, along with the education and retail objectives in light of the site's proximity to key services.</p> <p>Further to that, the SA also reflects on the land use and countryside impacts of the 'Sites that Perform Well' and summarises in Table 15:</p> <p>Sites that Perform Well</p> <p>SHLAA Site 184: Land south of St. Stephens Church, Hamsland, Horsted Keynes</p> <p>The site is anticipated to have a minor negative effect on land use and countryside.</p> <p>SHLAA Site 807: Land South of The Old Police House, Birchgrove Road, Horsted Keynes</p> <p>The site is within the AONB and the potential for major negative effects on countryside is therefore identified.</p> <p>The SA therefore concludes, in the context of delivering additional housing in a village that lies wholly within the AONB, that even sites that have 'the potential for major negative effects on countryside' can, in the right circumstances be judged in the balance to be categorised as a 'Site that Performs Well' and therefore be allocated for development.</p> <p>This judgement, which is a point that I will come back to later, is given further context by paragraph 3.4.6 in the SADPD Site Selection Paper 3 which states:</p> <p>It is important to note that a number of settlements in the plan</p>

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					<p>area are entirely within the AONB, including several settlements at Category 3 of the settlement hierarchy where the adopted District Plan Strategy distributes housing growth. It will be necessary to ensure that housing needs at settlements in the AONB are met where possible, including through allocation, where doing so does not cause unacceptable harm to the AONB. This is considered both a pragmatic approach to ensuring that the vitality of settlements in the AONB is sustained and that the District Plan Strategy is adhered to. Although the NPPF makes a presumption against major development in the AONB (paragraph 172), it does not define a development threshold which constitutes 'major' (footnote 55). In the context of the above, it is considered reasonable for the site selection process to test sites in the AONB for allocation, particularly in light of the fact that potential effects on the AONB are afforded great weight in the assessment process. Importantly, the High Weald AONB Unit supports this approach. A more detailed assessment is given for the 3 HK sites taken to Sustainability Appraisal on pages 132 and 133 of the document in Appendix 4: Housing Site Appraisals. Where:</p> <ul style="list-style-type: none"> a) is Site 184, Land south of St. Stephens Church, Hamsland; b) is Site 216, Land at Police House Field, Birchgrove Road Danehill Lane; and c) is Site 807, Land South of The Old Police House, Birchgrove Road; <p>it provides the following overall conclusion for these sites in HK: All sites score relatively positively on the social objectives. All options are within the High Weald AONB, hence negative impacts on the countryside objective. Options (b) and (c) are likely to have a greater impact than (a); however the impact has not been assessed as 'High' by the High Weald AONB unit. It is generally accepted (through adoption of the District Plan residual housing requirements for settlements) that development will take place within the AONB at settlements that are entirely within it. The sites perform positively overall, negatives could be mitigated, and there is a residual need at this settlement and Category 3 as a whole. Therefore, all three sites should be progressed for allocation.</p> <p>Given the strength and clarity of these conclusions in the</p>

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					<p>Sustainability Appraisal regarding prospective additional housing development in HK, this highlights the need to have high confidence that the Stage 3 screening decisions for HK that are summarised in SADPD Site Selection Paper 3 stand up to close scrutiny. This is particularly so as this site selection process is seeking to establish a comparison and prioritisation of possible sites for development, as set out in paragraph 3.5.5 of the SADPD Site Selection Paper 3, which states:</p> <p>The SA tested each site option on a settlement-by-settlement basis. This was important for two reasons. First, it tested the individual sites against the SA objectives to establish a site's performance in absolute terms. Second, it enabled comparison of sites within the same settlement by establishing the performance of each site in relative terms. Understanding the best site in relative terms means that even if a settlement has a number of sites which individually perform well, only the best performing sites following assessment in that settlement need be considered for allocation when viewed in the context of the District Plan strategy.</p> <p>My concern is that the Stage 3 shortlisting process for sites in HK was demonstrably flawed and, consequently, a sub-optimal shortlist of sites within HK was taken forward to Sustainability Appraisal.</p> <p><u>Stage 3 Screening of Sites in Horsted Keynes</u></p> <p>I concur with the Stage 3 screening conclusion that Sites 184 and 807 should be taken through to the Sustainability Appraisal. I feel that it was of little benefit to also take Site 216 to the SA as it lies wholly within Site 807, and the larger number of new homes for essentially the same impacts was always likely to be a stronger performer. Sites 184 and 807 in combination are projected to deliver a total of 55 new homes against a minimum residual requirement for Horsted Keynes, after existing commitments and completions, of 53 new homes, as set out in Figure 2.2 of the Site Selection Paper 3. This minimum residual requirement of 53 new homes in HK is an input to the process, not an output from it, as set out in Paragraph 2.4.4 of the Site Selection Paper 3 which states:</p> <p>Figure 2.2 below updates this spatial distribution in light of the April 2019 completions and commitments data. The Site</p>

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					<p>Allocations DPD must therefore seek to allocate sites in a manner which is informed by the distribution set out in Figure 2.2.</p> <p>The decision effectively to submit only two sites totalling 55 new homes against a must-meet residual requirement of at least 53 new homes in HK does not enable the SA to draw any meaningful conclusions regarding choices in HK, as advocated in paragraph 3.5.5 of Site Selection Paper 3.</p> <p>There are two other sites that passed the stage 2 sift that I contend should have remained in the shortlist after Stage 3 and been subjected to the Sustainability Appraisal. This would have enabled a meaningful prioritisation of credible choices to be undertaken as envisaged by paragraph 3.5.5.</p> <p>Whilst I fully appreciate, having worked at the planning stage of major projects for 35 years, that as paragraph 3.4.7 states: ‘A degree of professional judgement was required as the criteria were not assumed to be of equal weight’, this cannot be a crutch for maintaining a position that does not stand up to objective, evidence-based scrutiny. The two sites where I believe that the evidence warrants their continued consideration are:</p> <p>SHLAA Site 68: Farm Buildings, Jeffreys Farm – 6 new homes</p> <p>SHLAA Site 69: Jeffreys Farm Northern Fields – 22 new homes</p> <p>SHLAA Site 68: Farm Buildings, Jeffreys Farm – 6 new homes This site is also currently under appeal against MSDC’s refusal of planning permission (DM/19/0957) for a proposed development of 5 new homes.</p> <p><u>Previously Developed Land</u></p> <p>SHLAA Site 68 comprises 0.75 ha of land currently occupied by dilapidated farm buildings, two of which are marked as ‘Ruin’ on the OS mapping used in the documentation. Whilst these have been agricultural buildings, and may therefore not strictly satisfy the definition of a ‘brownfield’ site, this is certainly ‘previously developed land’ and is an obvious candidate for sustainable development in accordance with MSDC Local Plan Policy DP4: ‘The Council will also explore the potential to realise brownfield land housing capacity through the preparation of a Brownfield Sites register’ and as encouraged in the SA Sustainability Objective 7:</p>

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					<p><i>'To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.'</i></p> <p>Given these policy objectives, there should be a very strong presumption in favour of sustainable development on this site and there would have to be a very compelling reason for it not to have been shortlisted at Stage 3.</p> <p><u>AONB Assessment</u></p> <p>The AONB assessment is not that compelling reason – this site is one of only two sites in HK assessed as Low AONB impact. Given the weight attached to the AONB, this gives a further very strong presumption in favour of sustainable development on this site, unless there is another very compelling reason for it not to have been shortlisted at Stage 3.</p> <p><u>Local Road / Access</u></p> <p>The Stage 3 assessment for Local Road / Access appears to be the only reason for screening out this site as it is the only 'Very Negative' impact in the RAG assessment and the other 'Negative' impacts apply to all sites in HK. This assessment is therefore significant, and unfortunately it appears to be based on two factually incorrect conclusions.</p> <p>The first incorrect conclusion drawn is that <i>'securing a suitable form of access is unlikely because it is anticipated that there could be significant conflict with the existing junction (creating a crossroads), and achieving an appropriate level of visibility is unlikely because of physical constraints and third party land ownership'</i>. There are two possible means of providing access to this site:</p> <ol style="list-style-type: none"> 1. As vehicle speeds are low, the number of new dwellings is so small and additional trips generated will be correspondingly low, it is not untenable to contemplate using the existing farm track with its substandard existing access off the inside of the bend on Sugar Lane/Treemans Road – this is very similar to the existing accesses to Jefferies and Boxes Lane off Sugar Lane. 2. If this is deemed undesirable, the applicants have shown in their planning application DM/19/0957 that a new access could be constructed across Jeffreys Farm front field, land which is in their ownership and control, to join Sugar Lane on the

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					<p>outside of the bend between Boxes Lane and Jefferies. As Jeffreys Farm front field is covered by a covenant protecting the possible creation of a sports field and pavilion on this site at some stage in the future, I would suggest that the access that the applicants have proposed should be shifted northwards. This permits a football pitch still to be safeguarded and provides good visibility along Sugar Lane with minimal impact on hedgerows of providing visibility splays due to the bend in the road, as shown below:</p> <div data-bbox="1160 518 2056 933" data-label="Image"> </div> <p>The second incorrect conclusion drawn in the 'Very Negative' impact assessment is that 'Insufficient provisions in the locality suggest that the site is likely to be over reliant on private car use.' That is a comment that is equally applicable to every site in HK and reflects one of the difficulties of living in a beautiful village with very poor public transport connections. It cannot be a reason for excluding this site, which is 650m from the village bus stop and therefore meets SA Sustainability Objective 11: 'To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)' with its specific measurement criterion: 'number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)'. This site could potentially provide an additional 6 new homes that</p>

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					<p>satisfy that metric and hence meet rather than frustrate Sustainability Objective 11.</p> <p><u>Conclusion</u></p> <p>There is no evidence-based reason, or apparent rational professional judgement reason for excluding SHLAA Site 68: Jeffreys Farm Buildings at Stage 3 that then prevents its consideration at the SA stage. This appears to be a highly sustainable site for the proposed scale of development and its exclusion appears to be perverse and untenable.</p> <p><u>SHLAA Site 69: Jeffreys Farm Northern Fields – 22 new homes</u></p> <p>Having lived in two different houses in the village for over 34 years, I would contend that most of the village uses primarily (but not exclusively) the amenities provided by Lindfield and Haywards Heath rather than those in Forest Row and East Grinstead. As such, I would anticipate that traffic flows in and out of the village are higher on a combination of Keysford Lane and Treemans Road heading south towards Haywards Heath than they are on a combination of Waterbury Hill, Danehill Lane and Birchgrove Road heading north towards East Grinstead. Given the unavoidable bottlenecks on the main road through the village created by on street parking along the length of Station Road, this militates strongly in favour of sustainable development of suitable sites on the south and west of the village, unless constrained by other more significant considerations.</p> <p>It is instructive therefore to look at the Stage 3 assessment for SHLAA Site 69 and to seek to understand why this site has been excluded at this stage and whether the evidence supports the professional judgements that have been made.</p> <p><u>AONB Assessment</u></p> <p>The principal reason for excluding this site from further consideration appears to be the AONB High impact assessment. Given the explanation set out in paragraph 3.4.6 in the SADPD Site Selection Paper 3 and discussed above regarding AONB considerations in Category 3 settlements wholly within the AONB, of which HK is one, it is important that this assessment is robust and rational as important implications flow from this conclusion.</p> <p>The first statement in the AONB assessment is: '<i>High impact on AONB as development would be out of character with the</i></p>

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					<p><i>settlement pattern of Horsted Keynes.</i></p> <p>Unfortunately, this statement is completely at odds with the historic development and settlement pattern of Horsted Keynes and with the outcome that would arise if development was undertaken on this site. Other than a limited number of windfall sites, Horsted Keynes has developed over the years initially as a series of linear developments along the existing lanes and roads e.g. the house where I live on Lewes Road was one of a pair of detached houses built in 1925, and then over the last 60-70 years as a series of small discrete developments e.g. Hamsland, Challoners, Jefferies, Boxes Lane, Rixons, Rixons Orchard, Cheeleys, Hillcrest, Lucas. All of these have been built around generous public open space in the centre of the village in the form of the village green, HK Recreation Ground and HK Cricket Pitch.</p> <p>If one considers development on SHLAA Site 69: Jeffreys Farm Northern Fields, and does so in the context of public open space in perpetuity on Jeffreys Farm front field (as protected by its covenant) and potential development on SHLAA Site 68: Jeffreys Farm Buildings, I would contend that such a development of one or two discrete developments encircling public open space is as 'in character with the settlement pattern of Horsted Keynes' as it is possible to get.</p> <div data-bbox="1164 952 2047 1364" data-label="Image"> </div> <p>The AONB assessment goes on to make three factual statements: <i>'Undulating field to the north of the farmyard site. No</i></p>

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					<p><i>watercourses mapped. Jeffrey's Farm is a historic farmstead separated from the village by Sugar Lane' before remarking that: 'The western side of the lane is characterised by dispersed settlement and development of this site would be uncharacteristic of this area.'</i></p> <p>This is a somewhat misleading statement as the eastern side of Sugar Lane is densely developed comprising three detached houses and ten semi-detached houses, some of these with postal addresses on roads off Sugar Lane. The western side of Sugar Lane is currently undeveloped but from Jeffreys Farmhouse southwards to the village boundary comprises an unbroken development of detached and semi-detached houses on both sides of the road (The MSDC built up area boundary is very misleading in this respect as it does not include most of this development). In that context, it is difficult to draw an evidence-based conclusion that development of SHLAA Site 69 would be <i>'uncharacteristic of this area'</i>.</p> <p>The AONB assessment then states that: <i>'Sugar Lane and Keysford Lane are historic routeways. Mature trees on field boundaries and a dense screen of trees along Sugar Lane and at the junction with Keysford Lane which probably marks the original wider junction for driving stock.'</i></p> <p>These factual statements are no doubt true, but the dense screen of trees along Sugar Lane and at the junction with Keysford Lane is not affected by any development of SHLAA Site 69, other than, one might surmise, the logical possibility of wanting to thread a footpath and/or cycleway through the 40m depth of woodland to connect into the Station Road footpath which terminates at this junction. Given the depth of screening here, provision of this amenity would not make any perceptible impact on the screening provided by these trees.</p> <p>The AONB assessment then states: <i>'Post medieval field system due to more recent field amalgamations. Given the probable age of Jeffrey's Farmhouse it is likely that the whole farmstead is medieval in origin.'</i></p> <p>As SHLAA Site 69 is now acknowledged to be a modern field system, the evidence would not support this contributing to a High AONB Impact assessment of SHLAA Site 69.</p> <p>The AONB assessment concludes by stating: <i>'Very limited views</i></p>

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					<p>into the site from routeways due to mature hedgerows and trees. Once again, this evidence is clear that the site is well screened and does not support a conclusion of High AONB impact.</p> <p>In summary, whilst many of the AONB Unit assessments for sites around HK are wholly understandable, the evidence provided for SHLAA Site 69 does not give any evidence-based support for the High AONB Impact assessment of this site. If one disregards the evidence available, it still remains difficult to comprehend on more subjective matters how professional judgement could rationally conclude that this site has a High AONB Impact. The consequence of this High Impact assessment is that a potentially highly sustainable site has been excluded at Stage 3 from further assessment at SA Stage 4.</p> <p><u>Listed Buildings</u></p> <p>The Site Selection Appendix B proforma for SHLAA Site 69 indicates a Neutral (yellow) / Less than Substantial Harm impact on two listed buildings Ludwell Grange and Boxes Farm. The density of the tree screening on Sugar Lane provides and would continue to provide a very effective visual screen for these buildings and their setting. Any new road junction(s) into the site on Sugar Lane (and possibly Keysford Lane) would be at some distance from these two listed buildings and the resulting opening(s) would not adversely affect the screening of these buildings from any development on the site. The Neutral assessment seems reasonable.</p> <p><u>Trees/TPO</u></p> <p>The Site Selection Appendix B proforma for SHLAA Site 69 indicates a Neutral (yellow) or Low/Medium impact assessment on trees and TPOs. As with the Listed Building assessment, as these screens would not be adversely affected by development within the site, this Neutral assessment seems reasonable.</p> <p><u>Other Criteria</u></p> <p>Other than the Health and Public Transport Negative impact assessments, which are common to all sites in HK, all other criteria that have been assessed at Stage 3 are either Very Positive or Positive for SHLAA Site 69: Jeffreys Farm Northern Fields.</p> <p><u>Conclusion</u></p>

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					<p>There is no evidence-based reason, or apparent rational professional judgement reason for excluding SHLAA Site 69: Jeffreys Farm Northern Fields at Stage 3 that then prevents its consideration at the SA stage. This appears to be a highly sustainable site that could make a major contribution to meeting HK's minimum residual requirement of 53 new homes and its exclusion appears to be perverse and untenable. Indeed, given further consideration, it might be concluded that this site is sufficiently sustainable that it should be zoned for more than the 22 new homes currently proposed on the site.</p> <p>If this site were to be assessed at Stage 4 through SA and other assessments, it may well be that this site would prove to be more favourable than and would be prioritised over other sites in the village, in accordance with paragraph 3.5.5 of the SADPD Site Selection Paper 3, which states that: <i>'only the best performing sites following assessment in that settlement need be considered for allocation when viewed in the context of the District Plan strategy'</i>.</p> <p><u>Comments on HK Sites currently allocated in Draft SADPD</u></p> <p>As stated earlier, I concur with the Stage 3 screening conclusion that Sites 184 and 807 should be taken through to the Sustainability Appraisal. However, I will take this opportunity to make the following comments on both sites, which informs my view that the two Jeffreys Farm sites might better be prioritised ahead of one or both of the currently allocated sites in HK.</p> <p><u>SHLAA Site 184: Land South of St Stephens Church</u></p> <ul style="list-style-type: none"> ▪ The AONB Low Impact assessment is understandable and appears to be appropriate on the evidence provided. ▪ The Neutral (Yellow) / Low/Medium impact on Trees and TPO looks to be highly optimistic given the narrow width of the access route into the site from Hamsland. It seems probable that any appropriately sized access to the proposed development of 30 new homes would require removal of the mature trees currently screening the north-western boundary of the site. ▪ The Highly Positive (Bright Green) impact assessment for Local Road/Access is impossible to reconcile with local knowledge.

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					<p>Hamsland is a narrow cul-de-sac serving a large number of dwellings and is already constrained by unavoidable on-street parking for houses on the north side of the road. The access challenges of serving an additional 30 new homes are considerable and, I would contend, warrant at best a Negative (Pink) rating. The housing on the north side of Hamsland sits up on a bank and the verge on that side of the road could not be removed to enable Hamsland to be widened. It would be necessary to remove the verge on the south side of Hamsland to provide any additional width to accommodate the extra traffic. I suggest that the portion of Hamsland between Lewes Road and the access to St Stephens Field would ideally be in the order of 8m wide, being 5.5m roadway with a 2.5m wide marked parking bay along its length. If this cannot be achieved in the space available, then serious consideration should be given to the number of properties (if any) proposed to be developed on SHLAA Site 184 given the access difficulties.</p> <ul style="list-style-type: none"> Conclusion: If, after further assessment, this site continues to be prioritised in the site allocation for development in HK, it may be that this site should be zoned for a lower density development with fewer dwellings as it is on the edge of the village, is fairly remote from the bus route by contrast with other sites in the village and has demonstrable access difficulties along Hamsland. <p><u>Site 807, Land South of The Old Police House, Birchgrove Road</u></p> <ul style="list-style-type: none"> The AONB Negative (Pink) Impact assessment is, if anything, somewhat generous, given the narrative which accompanies the conclusion, for instance the loss of a medieval field system with some visibility of the site from Danehill Lane. On the evidence available, this appears to be a more severe impact than would be experienced on SHLAA Site 69: Jeffreys Farm Northern Fields yet the assessment is stated as less severe, notwithstanding the available evidence underpinning these assessments. The Neutral (Yellow) Less than Substantial Harm impact on the Grade 2 listed Lucas Farm is slightly surprising as this building is directly over the road from the northern edge of the site and is unlikely to be heavily screened from the

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					<p>development. Indeed, the existing mature oak tree in the southern road verge, which currently provides some screening of the site from Lucas Farm, must be at risk of removal in order to be able to provide a safe visibility splay on exit from the site onto Birchgrove Road.</p> <ul style="list-style-type: none"> Local Roads/Access is assessed as Positive (Light Green) Impact and the narrative focuses on ensuring that the site is accessed from the north off Birchgrove Road, which I accept is the correct solution. However, there is no mention of the dangerous conditions that additional traffic will exacerbate at the eastern end of Station Road where westbound vehicles regularly drive up onto the pavement to be able to pass eastbound vehicles given the narrow road width and on-street parking in this location. <p><u>Conclusions</u></p> <p>This is an excellent and rational process that MSDC has followed, which I support strongly. It has helped to bring home to many communities that we must all play our part in enabling sustainable development of additional much needed housing in our communities. HK has a substantial role to play in delivering our minimum residual requirement of 53 new homes over the period. I therefore believe that the Stage 3 process was unfortunately flawed in sieving to such an extent that only two sites (in effect) delivering a maximum of 55 new homes were submitted for Sustainability Appraisal at Stage 4. I do not believe that the evidence supports the exclusion of the two Jeffreys Farm sites (SHLAA 68 and 69) which I believe should still remain under active consideration and may prove to be more attractive than one or both of the currently favoured sites. I hope that this submission is helpful and I would be happy to respond to any questions or clarifications that you might wish to pursue.</p>
089	001	Robert Lloyd-Sweet	Historic England		<p>Thank you for consulting Historic England on the Pre-submission version of the Horsted Keynes Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment, including advising on planning policy to secure the conservation and enjoyment of heritage assets and champion good design in historic places. As such we will only comment on planning issues that fall within our remit and silence on other</p>

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					<p>matters should not be read as agreement or consent.</p> <p>It is the community's choice what areas of planning policy they wish to address in their neighbourhood plans. As a national advisory organisation we may not have familiarity with all issues affecting the historic environment in your area, nevertheless we do have considerable experience in the formulation of planning policies and will provide advice where resources and opportunity allow to ensure your policies are robust and achieve the desired outcomes. We will also provide comments where policies could have effects for heritage assets that need to be considered within the requirements of national planning policy and legislation to ensure the plan meets the basic conditions.</p> <p>I am happy to confirm that we have no objections to raise concerning the plan's proposals. We note that the allocation of sites appraisal has considered the impacts on the historic environment including the Historic Environment Record and accounts for impacts to sites of archaeological interest. However, the HER and archaeology does not appear to have been taken into account elsewhere in the neighbourhood plan. It is also not always clear in the assessment of sites how the impacts to heritage assets have been determined. In particular, where proposals would affect a designated heritage asset, such as a listed building, the need to conserve the asset should be given "great weight" irrespective of whether the potential for harm would be substantial or less than substantial. At present the apparent assumption in the assessment of sites that less-than-substantial harm equates with a low impact does not necessarily fulfil this requirement and does not lead allocation policies to address potential harm by seeking to ensure that it will be avoided or minimised. We recommend considering whether mitigation for potential impacts to the settings of the conservation area and the listed building at Lucas Farmhouse.</p> <p>The sustainability appraisal is also light in terms of the consideration of archaeological remains of interest and given the focus on infill development it might be helpful to examine whether any areas of the settlement have a higher potential for presence of areas of archaeological interest where infill proposals will need to give greater consideration for the conservation of the</p>

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					<p>settlement's archaeological record. Other than that the plan has paid attention to preserving the village's distinct character and significance of the conservation areas, through a character and design policy (HK4) and the designation of three local green space that contribute to the historic interest and character and appearance of the Horsted Keynes Conservation Area (HK7), both of which we supportive.</p> <p>There are a small number of areas where we feel that policies should be strengthened through references to heritage and compliance with relevant local and national policies.</p> <p>Policy HK5 Infill development and extensions. We feel that, given the extent of the conservation area within the settlement boundary the policy should include a requirement for particular care to be taken in preserving the significance of nearby heritage assets in addition to the separate heritage assets policy. This should help to reduce potential for a possible conflict between policies.</p> <p>Policy HK6 Conserving Local Heritage Assets – For the sake of completeness the opening sentence of this policy should refer to District Plan policy DP34 as well as DP35. The policy also makes no mention of archaeology (which isn't mentioned in the Neighbourhood Plan document at all, but does appear to have formed part of the SEA), which may also provide sites and areas that are considered to be heritage assets within national policy for the historic environment. We suggest the following wording is considered for inclusion within the policy: <i>"Development proposals should demonstrate that they have taken into account the potential impact on above and below ground archaeological deposits and to avoid or minimise impacts to sites that may be identified as previously unidentified heritage assets. Potential impacts should be identified in a supporting Heritage Statement as part of any planning application and any harm or loss of significance will require robust justification in terms of the delivery of public benefits that could not otherwise be provided. The County Historic Environment Record (HER) should also be consulted."</i></p> <p>Policy HK15 – We support the design parameters to ensure equipment is sympathetically designed and located. At bullet point</p>

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					<p>a) we recommend using "avoid and minimise harm to" rather than "reduce adverse impacts on", which would be more in line with relevant local and national policy as well as identifying heritage assets as another potential receptor of impacts, the conservation of which should be given great weight in decisions. It might also be helpful if the policy more explicitly identified sensitive areas beyond the generic term 'landscape' to include Areas of Outstanding Natural Beauty, archaeological sites, conservation areas.</p> <p>We hope these comments are of assistance to the steering group but will be pleased to provide any further information or answer queries that may arise from them.</p>
090	001	Myra Boyce	Resident		<p>I wish to offer general comment on aspects of the Draft Plan, as well as specific comments about the plans for the land south of St Stephen's Church, Hamsland.</p> <p>In general terms, there seems to be most emphasis on housing needs and housing development in the plan but I am concerned whether there truly can be a demand for so much additional housing, especially for the younger generation, when the cost of living within the village carries its own burden and the village infrastructure is shrinking.</p> <ul style="list-style-type: none"> the bus service is not able to support the needs of our busy, modern lives and can only deteriorate further, hence people need their own transport the village car park is increasingly busy with current housing and this leads to congestion along Lewes Road and the Village Green the village shop provides an admirable service, especially in times of crisis, but cannot provide for all ages within the village community all previous retail outlets in the village have been converted over to housing the local industrial estate shows no real sign of reenergisation and there is not much local work for people moving into the area

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					<p>With specific reference to the St Stephen's land, I have been the householder at 28 Hamsland for the past 40 years and yes, I would be directly affected directly by this development.</p> <p>I have been reminded by successive landowners about the potential for further development on the land in question, so it is no surprise that it is now under active consideration.</p> <p>It has been a privilege to live here with the open aspect to the rear of the house but I certainly do not feel it is a right that things should remain that way but this heavily populated area of the village has already experienced</p> <p>several phases of development over the last 70 years and I wonder whether it can cope with another one.</p> <p>So, in good faith, I would like to offer my misgivings, about various aspects of the proposed plans for this area:</p> <ul style="list-style-type: none"> the additional traffic along Hamsland both during the construction and as a result of the new houses will be a heavy burden for all the access road for the site is at right angles to Hamsland and although there are plans to widen Hamsland, in my opinion, that will still not fully provide for current parking needs or better access to the site it would seem unlikely that the tree line along the side of the access road will not be compromised, despite stated intentions the plan states that the development 28-34 Hamsland is considered to have 'compromised the medieval field system', when I had always considered <p>that they provided an infill between two pre-existing cottages that were originally linked by Bonfire Lane. Now of course, the start of Bonfire Lane is also the</p> <p>beginning of the Conservation area - any trees there are heavily protected, just some 500 metres away</p> <ul style="list-style-type: none"> parking space is already at a premium - St Stephens Church was providing additional and unofficial parking for

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					<p>some years and the loss of that space has been noticeable</p> <ul style="list-style-type: none"> the numbers of cars in this area is already high - 2/3 vehicles per household, including business vehicles, medium to larger sized vans and machinery - these are all necessary for residents to conduct their lives for work, social and housekeeping needs and the same would be true for any new residents some householders have created extra driveway parking to ease the situation but there is not enough scope for this all the way down the road modern life has created more traffic and not just in times of Covid19 - food and parcel delivery vehicles, oil tankers and emergency vehicles already make negotiating the road difficult, at times. <p>In just the last month, I have had to wait up to 10 minutes on at least four occasions to be able to drive out of Hamsland</p> <ul style="list-style-type: none"> the new housing will add additional parking needs, because the number of planned parking spaces does not seem to fully reflect the reality of life in the village, as stated above is the basic infrastructure of roadway, water supply, electricity etc be sufficient to uphold additional houses? <p>Finally, I would like to offer all members of The Parish Council thanks for the time and effort that has brought the process to this point and also my appreciation for how difficult it will be for everyone to be satisfied with the outcome.</p>
091	001	Simon Nicholson	Resident		<p>Having read the village plan I would be unable to vote in favour of it because the sites selected are inherently flawed for the reasons set out below:</p> <p>1. The police field site originally put forward in the village plan in (2015) was for a much smaller development and did not wrap around the existing houses on Birch Grove Road and Bonfire Lane. The enlarged plot – I believe put forward by MSDC – is much more intrusive on those existing village residents living on the roads noted above. Having a larger development in this location will also generate more traffic through the narrow road and bend</p>

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					<p>from the village green to Birch Grove Road, a stretch of road which gets congested enough as it is.</p> <p>2. The inclusion of St Stephens Field flies in the face of considerable opposition from village residents, as evidenced by the large petition which was raised in 2019. The site breaches several criteria which the Village Plan itself espouses:</p> <p>a. It will involve the destruction of a considerable amount of trees and hedgerows, especially ancient oaks on the access road.</p> <p>b. It will increase the pressure on an already busy and congested road (Hamsland) which is effectively reduced to one lane due to roadside parking. Putting extra traffic down this road such as a c. 30 dwelling development would create makes no sense and would be hugely disruptive to existing residents.</p> <p>The Village Plan is also flawed in that the “local green spaces” it intends to “conserve and enhance” does not specifically include Constance Wood Field which is an important recreation area for this part of the village and should be on that list. I would ask therefore that the Parish Council (PC) should include Constance Recreation Field in all of its paragraphs referencing recreational spaces. The casual reference in the Village Plan to another recreational area used by some residents on the edge of the village, is not acceptable.</p> <p>Returning to site selection, the Village Plan ignores the Jeffrey’s Farm sites. These sites could be developed with far less disruption to existing village residents, access is straightforward and the site is on the west side of the village and so would not pull traffic through the village centre and the narrow bend before Birch Grove Road. Factual errors included by MSDC in its ruling on the lack of suitability for that site have not been corrected by the PC, which reflects poorly on the latter. Moreover, the PC has not supported the owner of Jefferies farm in correcting this error in MSDC documentation which would prove that access to this site is not restricted at all and that it is therefore suitable for development. Furthermore, the PC has not sought to equalise the AONB assessment of sites across the village which currently show that the Jefferies farm sites have a higher AONB rating than the Police Field and St Stephens field. Given their proximity to each</p>

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					<p>other, all should either be High or all should be low and thus either all or none suitable for housing development.</p> <p>In conclusion, the Village Plan Site Selection is flawed and does not, I believe, represent the views of the majority of the Village.</p>
092	001	Elizabeth Lawton	Resident		<p>As part of the public consultation I want to comment on the draft neighbourhood plan.</p> <p>I do not support this plan for a number of reasons but mainly because of the site allocations. I do not agree that we should defer to Mid Sussex for the allocations of sites when the whole point was for the local community to determine what happens in Horsted Keynes. I don't agree with the two sites that have been put forward. St Stephen's Field is completely unsuitable due to poor access. Access via Hamsland will add to an existing problem of traffic and roadside parking. I don't understand why a greenfield site with all the associated traffic problems has been chosen over a brownfield site. There is a brown field site in Horsted Keynes (Jeffrey's Farm) that seems to have been disregarded</p> <p>I believe the site allocation of St Stephen's Field is both incomprehensible and unsustainable.</p> <p>If the plan in its current form goes to referendum, I will be voting against it.</p>
093	001	Emma Bell	Resident		<p>We oppose the adoption of the Parish Council Neighbourhood Plan due to obvious issues relating to the traffic and parking around Hamsland that will only get worse with the adoption of St Stephen's field. The developer's transport report is incomplete in that it does not take into account the parking of larger vehicles on Hamsland or allow for passing places to name a couple of issues. The report only represents 4 days of the time that the equipment was installed and only covers restricted hours, not full 24 hour periods. It would be interesting to see the entire results of the traffic survey, not just the parts that the developers chose to disclose. Also from the proposed plans of the new development there are insufficient parking places for each house to park 2 cars which would seem inadequate given that most houses have 2 cars due to the lack of public transport in the village. Furthermore the</p>

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					<p>proposed development also needs to ensure that it is aligned with the new West Sussex County Council Guidance on Parking at New Developments.</p> <p>If these issues could be addressed and resolved then we would be happier in adopting the Parish Council Neighbourhood Plan.</p>
094	001	Caroline Burton	Resident		<p>I consider this plan unsatisfactory as it does not protect the interests of the village in line with the Localism Act and would not support it. I am concerned that issues raised about the plan to the Parish Council have not been fully investigated.</p> <p>I disagree with the proposal of St Stephens Field site, this will cause further traffic problems along an already congested Hamsland, Lewes Road and Station Road and could lead to building on Constance Field creating even more negative impact. Other sites such as the Jefferies sites were excluded, these would have had less of a negative impact on the village.</p> <p>In conclusion I believe that the plan needs revision before it can be submitted for referendum</p>
095	001	Kenton Lawton	Resident		<p>I wish to comment on the Draft Neighbourhood Plan produced by Horsted Keynes Parish Council in respect of the Horsted Keynes Neighbourhood Plan. I do not support this plan as I believe that there are serious issues with this draft plan as it stands and as such should not be progressed without wider community engagement. Site Allocations The main reason for objecting to the draft plan is that you have chosen to defer to Mid Sussex District Council (MSDC) for the allocation of sites. One of the key benefits of The Localism Act was to enable local communities to have their say in determining what happens in their community. Deferring to MSDC does not do this, it does the opposite. The two sites that are being allocated do not meet the required number of dwellings required by the emerging MSDC plan. (55 vs 69) St Stephen's Field The site put forward with the largest number of dwellings is St Stephen's Field which is completely unsuitable for development due to very poor access. Access is via a heavily overparked congested cul-de-sac of Hamsland which already serves 125 homes. Add to this a petition supported by 330 residents, showing the strength of feeling against this site that was presented to the Parish Council in 2019. It is unlikely given this number of</p>

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					<p>objectors that a neighbourhood plan including this site would gain the necessary community support to see it adopted. Old Police House The land to the south of the Police House is not ideal as it means the majority of the traffic associated with this site would have to navigate two congestion pinch points. The majority of traffic exits Horsted Keynes to the south to access Lindfield for the surgery, pharmacy and shops etc or to Haywards Heath for the larger town and rail service to London and Brighton. There is already significant congested parking between Bonfire Lane and Lewes Road. Developing this site to the north of the village meaning the majority of traffic would need to navigate through these pinch points does not support the stated objective of reducing negative impacts of traffic. Other sites not considered</p> <p>The Parish Council has completely disregarded Jeffrey's Farm sites, with existing edge of village access, some of which is brownfield. How can you be choosing greenfield development over brownfield sites? This is incomprehensible and unsustainable. Indeed this seems to contradict your Sustainability Assessment; Table 7.1 of the Horsted Keynes Sustainability Assessment states as its third objective: "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". In September 2015 at a village workshop the Parish Council decided to remove the Jeffrey's Farm site from 'sites for inclusion in the emerging neighbourhood plan'. When villagers were subsequently asked if they would have liked to have seen the site included for possible development 63 villagers wished the site to be included with only 48 wanting it to be excluded. Additionally, at a previous neighbourhood plan village initial site consultation event in January 2015 twice as many villagers supported developing these combined sites than were against. I would strongly urge the Parish council to review all of the southern edge of village Jeffrey's Farm sites that have good access to be included in the plan. Sites here could meet both objectives which have been missed by this plan; local housing to meet the needs of younger people and families and to reduce the negative impacts of traffic and roadside parking and include some brownfield development. The site allocations do not provide the basic housing numbers required of Horsted Keynes identified in the emerging District Plan and fail to take into consideration the</p>

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					<p>views of a large proportion of villagers. Objectives There are a number of stated objectives which are not met through this draft plan. One of the key stated objectives of the plan is: "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 the village age profile." Despite many sustainable sites for development being put forward to the Parish Council only two have been included in the draft plan. The two sites will provide 55 new homes. 55 dwellings does not meet the emerging District Plan's requirement of 69 dwellings, and the 11 included from Westhall are very debateable as to whether they should or could be included in the 69 as they are not 'released on the open market', and they certainly do nothing to achieve the above objective 'meeting the needs of younger people and families' as these are in a care home. Another objective of the plan is "Reduce the negative impacts of traffic and roadside parking on the village" By allocating St Stephen's Field you will be doing exactly the reverse. Suggesting an additional 30 dwellings are built on St Stephen's Field will cause mayhem on the already dreadfully congested Hamsland, the access route to the site. The road is on a curve and is virtually solidly parked on one side of the road between its intersection with Lewes Road to its intersection with Challoners. You are unable to see the exit point when you enter this 'blind' curve. Adding a further 30 dwellings with c. 60 more vehicles is madness when there are far better sustainable sites on the southern edge of the village. This suggested site will not 'reduce the negative impact of traffic and roadside parking' it will add further congestion. Allocating Old Police House will add to congestion at the two key pinch points on the through route through the village. An issue which would be avoided by supporting the Jeffrey's Farm southern sites. Lack of Consultation Since workshop events in September 2015 run by the Parish Council there has been little consultation at all with the wider community, it has been virtually non-existent. The only key engagement with the public regarding this plan was an extraordinary meeting in 2019 where the representations of 300 villagers opposed to the inclusion of St Stephen's Field fell on deaf ears. This lack of consultation means that the plan has not been developed in a transparent and open way in dialogue with the community. Indeed, the Parish Council has chosen to support the</p>

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					<p>inclusion of St Stephen's Field despite significant objections from the community. It should also be noted that for much of the time since 2015, the neighbourhood plan steering group consisted of four Parish Councillors, two of whom had a declared conflict of interest with one of the key potential development sites which was excluded for erroneous reasons. Full details of this were submitted by me in my response to the original consultation.</p> <p>Local Green Spaces</p> <p>Policy HK 7 – Local Green spaces has a major omission which is Constance Wood Field. This field is used by dog walkers and has recently been part of the Village verges biodiversity programme. Protecting this site is also important to stop development spread given MSDC own both this field and the one beyond. Constance Wood Field should be listed as a protected Green space. I would urge that for the reasons outlined you do not continue with the plan as it stands. If this plan does come to referendum in its current state, I will be voting against it.</p>
096	002	Kenton Lawton	Resident		<p>Further to my comments on the Public consultation, I would like my name removing as being involved in this plan.</p> <p>Whilst I headed the steering group at one point, the current plan bears no resemblance to anything I supported and as such it could be conceived that by my name being included, I am supporting this plan. I am not.</p> <p>Please remove my name from any further documents relating to this plan.</p>
097	001	Pedro Santos	South East Water		<p>South East Water would like to thank Horsted Keynes Parish Council and Mid Sussex District Council for bringing the Horsted Keynes Neighbourhood Plan Consultation to our attention. Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our WRMP19 in August 2019. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 60 years up to 2080. The plan takes into account planned housing growth as well as the potential impact of climate change and includes our ambitious water efficiency programme. For more information please visit our</p>

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					<p>website: https://corporate.southeastwater.co.uk/about-us/our-plans/water-resources-managementplan-2019/ In South East Water's most recent business plan we have committed to play an active role regionally in relation to the impact of housing growth on water. We will develop a policy together with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the south east region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our business plan: https://corporate.southeastwater.co.uk/media/2901/sew_five_year_business_plan_2020-2025.pdf</p> <p>We are also committed partners in the Water Resources in the South East (WRSE) Group that works for the collective good of customers and the environment in the wider south east region and are nationally represented in the Water UK water resources long-term planning framework. Our aim of reducing demand requires the use of new approaches and technology. Although there is some uncertainty on the level of savings that can be achieved we are seeing a development of new technologies and we are committed to reduce personal water usage and leakage levels in order to be more sustainable for next generations. Our preferred plan for the period 2020 to 2025 includes a mix of demand management initiatives such as leakage reductions and an ambitious water efficiency programme. During the period 2025 to 2045 we will continue our demand management initiatives to achieve further leakage and water efficiency savings. South East Water have now reviewed the Neighbourhood Plan and would like to comment that: South East Water consider that it is important and agree with Horsted Keynes Parish Council and Mid Sussex District Council on the points raised as part of the Neighbourhood Plan objectives and would like to add that water efficiency could also be promoted to existing buildings and new buildings, either residential or non-residential across the Council. South East Water recommend the need of a mandatory housing standards for water</p>

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					use which would support water efficiency on new buildings and promote the collaboration between Horsted Keynes Parish Council, Mid Sussex District Council and developers. South East Water will work with local authorities and developers to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators. South East Water would like to be kept updated with any developments relating to Horsted Keynes Neighbourhood Plan and we have noted above a number of areas where we welcome an opportunity to meet and discuss with the Council. We look forward to working with Horsted Keynes Parish Council and Mid Sussex District Council to ensure that drinking water supplies remain protected in the area in the future.
098	001	Richard Franklin	Highways England		<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. In the case of Horsted Keynes our focus will be on any impact to the A23 / M23 corridor.</p> <p>Highways England has reviewed the Horsted Keynes Neighbourhood Development Plan and accompanying documents. We note that the Mid Sussex District Plan (MSDP) includes a housing allocation for the parish of Horsted Keynes of 69 dwellings for the Plan period to 2031. Table A outlines that, as of 31st December 2019, there had been 18 completions and commitments, with two further sites in Horsted Keynes Parish identified within the MSDP due to deliver 55 dwellings as below,</p>

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					<p>bringing the total to 73 dwellings:</p> <ol style="list-style-type: none"> 1. SA28 – Land south of Old Police House, Birchgrove Road – 25 dwellings 2. SA29 – Land south of St. Stephens Church, Hamsland – 30 dwellings <p>The Horsted Keynes Neighbourhood Development Plan housing strategy will therefore rely on the MSDC site allocations above to meet its residual housing requirement over the Plan period.</p> <p>As such, Highways England does not have any objections to the Horsted Keynes Neighbourhood Development Plan. However, if proposed new housing sites come forward or the quantum of development in Horsted Keynes Parish significantly exceeds the 73 proposed new homes up to 2031, then we will wish to be consulted and may require an assessment of the cumulative impact upon the A23 / M23 corridor.</p> <p>Please also note that we look to Mid Sussex District Council to assess and mitigate any impacts of development in its Local Plan to 2031, including housing to be provided through neighbourhood plans, upon the SRN. This is because Highways England is concerned that the housing to be proposed across the district could have an adverse impact on the strategic road network in terms of safety and congestion, either cumulatively and/or as individual sites.</p>
099	001	Hilary Watson	Resident		<p>If the Neighbourhood Plan is to proceed to referendum then I would not support it for a number of reasons as listed below.</p> <ol style="list-style-type: none"> 1. I do not believe that the plan reflects the majority opinion of the villagers, nor does it protect the interests of the village. We are responsible for major changes in the village which will effect future generations and it is the responsibility of the village to act in the best interests of the village as a community, not on the basis of how any development would individually impact us. It is our responsibility as a village community to retain the unique features and character of our village. 2. The Plan is merely promoting the wishes of MSDC and this

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					<p>fundamental decision, to defer to MSDC, was not put to the village. It promotes moving the 'built up area boundary' to accommodate developments. It uses ANOB as an argument against certain sites, when the whole of the village, including all proposed sites, is within an ANOB. The Plan is taking choice away from the parish.</p> <p>3. There are already issues arising due to traffic in the village, as well as parking problems (particularly on The Green, and Hamsland). The Green has been reduced to a single roadway with cars parked along one side – Hamsland is the same. The village is simply not able to accommodate any more through traffic, or parking requirements. The current problems would only become worse following completion of the proposed developments. During development I would be extremely concerned as to the ability of emergency services to attend properties as it would only take one lorry to completely block the road. There are currently regular blockages in Hamland due to delivery vehicles – particularly heating oil lorries which need to park in front of a property to deliver fuel (which effectively blocks the road for a period of time). Daily vehicles have the reverse to allow others through. Ambulances are quite often called to Hamsland and Challoners and there is a real danger that any further access issues will seriously hinder their ability to gain access to patients.</p> <p>4. With regard to St Stephens site particularly I do not support this development as I believe it will ultimately lead to more development into Constance Wood Field (CWF). CWF is currently owned by MSDC but is landlocked so cannot be developed. If the St Stephens site is developed then this would give access to CWF and possible future development. This represents a clear conflict of interest on the part of MSDC proposing this site. St Stephens site also is only accessible via Hamsland which has cars parked down one side of the road thus leaving only a single track access to Hamsland and Challoners. Hamsland and Challoners, it should be noted, is a cul-de-sac. The remaining single track of road access is curved and so drivers cannot see if the road ahead is clear. It is only when you drive into Hamsland and meet another</p>

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					<p>vehicle head on that you know the road is busy. Then one vehicle would have to reverse to let the other through. The road is on occasion block completely for a period of time while deliveries are made.</p> <p>The Neighbourhood Plan shows Hamland as a through road into Bonfire Lane and beyond which is simply not the case, it is a cul-de-sac, with Bonfire Lane being a single track private road with a physical barrier between the two. Maps used are incorrect. All investigations have been undertaken on that basis which renders them misleading and unreliable.</p> <p>5. The Police House sites would also create more traffic coming through the village as the majority of journeys by villagers are into Haywards Heath which would necessitate them travelling through the village, The Green, which again is now a single track road (with cars parking all the way down one side). I would give consideration to site 216 as it is smaller, but think that site 807 is too large and will generate too much traffic.</p> <p>6. I would support the development of Jeffreys Farm sites, 68, 69 and 971 as I believe that these provide the most logical and manageable option for development within the village. They will have the least impact on the village as a whole both during the development phase, and post development. They also impact the least number of individual neighbouring households. In fact the developments would not be visible to all but a few households. Access can be gained safely via the field adjoining Sugar Lane. It has been reported that access is not safe onto Sugar Lane due to poor visibility but this is simply not true. It has also been reported that there is a covenant on the possible access field which would not allow it to be used – this again is simply not true. The covenant allows for an access road across it, and it also allows for a sports pavilion to be built. There would be adequate space on these developments to provide off street parking, and access to the development would not cause any issues. If you look at an aerial view of the village Jeffreys Farm would appear to be the most logical and sensible area in which to develop, enhancing the overall village shape and</p>

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					<p>distribution of built up areas.</p> <p>7. The Neighbourhood Plan identifies the most needed housing as that for single people, and couples, but the type of housing proposed does not meet those needs.</p> <p>8. Although we have a bus service which is valued, but which comes under regular threat of being terminated, it has been determined that car ownership and dependence is high in the village. Surrounding access roads to the village are in a poor condition, narrow, and dangerous in places, and not scheduled for surface improvement until 2021/22. A major consideration in any development should be the inclusion of off street parking, and the impact of increased vehicles on the village roads and lanes.</p> <p>9. The Neighbourhood Plan is inaccurate in places describing Horsted Keynes as a “small village”, when in section 9.2 it is described as a category 3 settlement which is a medium sized village providing essential services to its villagers and surrounding communities.</p> <p>10.The findings, views and concerns expressed by the Hamsland Action Group appear to have been largely ignored.</p> <p>11.The Neighbourhood Plan contains incorrect data and inconsistent rankings of the sites.</p> <p>If looked at with corrections made it clearly shows that St Stephens Field, and The</p> <p>Police House, are not the most sustainable sites in the village. It shows that Jeffreys Farm is a more sustainable site, is more appropriate for development, and would have minimal impact on the village. It is supported by many in the village simply because it will create the least traffic issues, and will be barely visible to other residents. I find it hard to understand how a few residents who would be slightly impacted by the Jeffreys Farm Site are able to have their views prioritised over the majority of residents who would be impacted by both the St Stephens Field, and Police House Field, developments.</p> <p>The general view of villagers is that their comments and wishes</p>

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					<p>are not being considered or actioned so there is a feeling of their views not being valued. The last direct involvement and engagement with local people was in 2015 which was generally very well received but following this, when their opinions appear to have been ignored, interest has wained which is a poor reflection on the Parish Council who are elected to represent those views.</p> <p>Horsted Keynes needs protecting as do other villages. Too many are being lost to over development, effectively being joined to the next village and town. We need to protect our village to retain its character and charm. If we don't make a stand and fight for what we want, rather than what MSDC want, then who will. We should be working together to leave a village to the next generation to be proud of.</p>
100	001				