

# Horsted Keynes Neighbourhood Development Plan Consultation Statement

Published by Horsted Keynes Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended)



How we involved the local community in preparing the plan, what they said, and how it was taken into account

**Horsted Keynes Parish Council**

**July 2022**



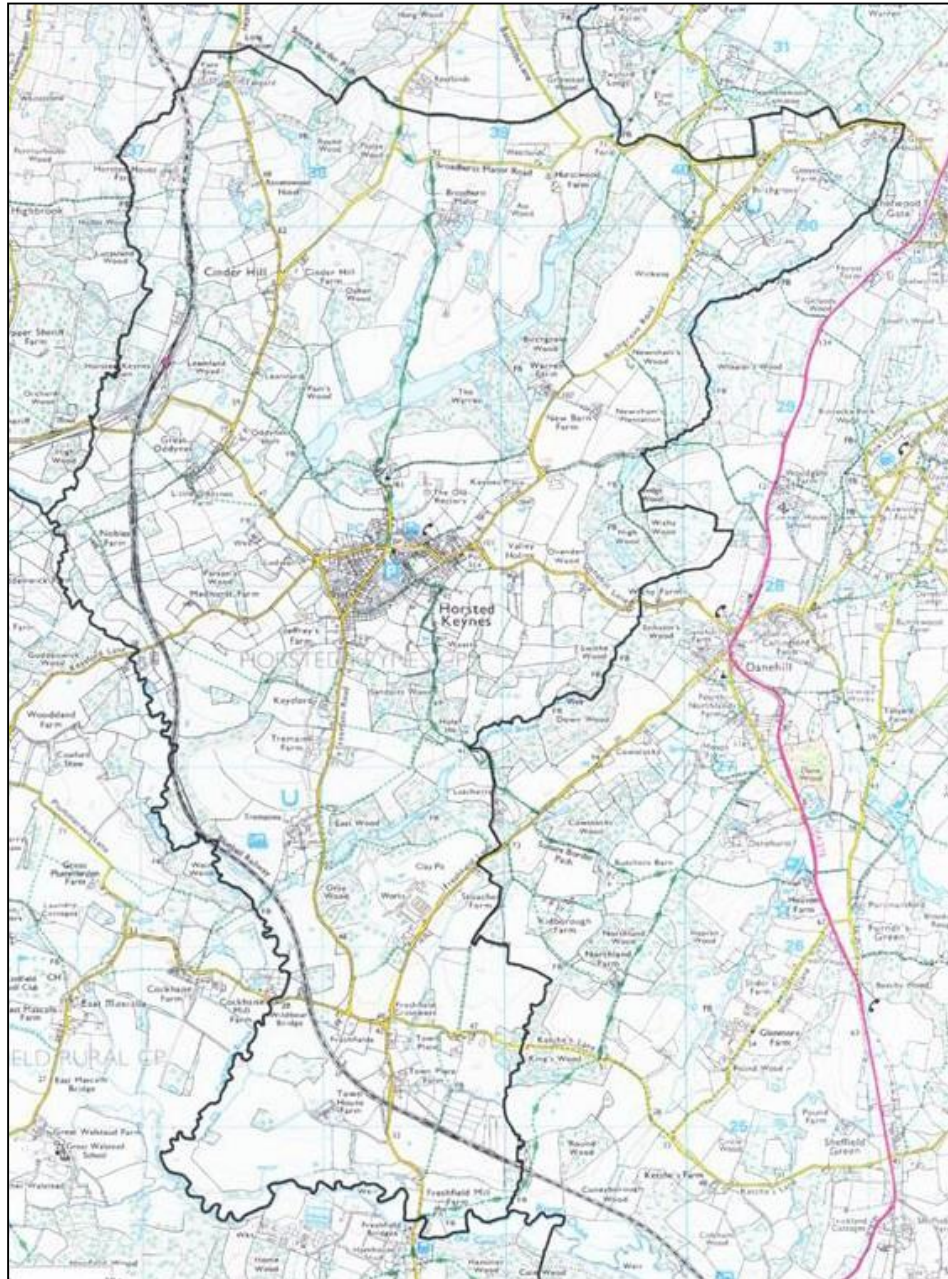
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# 1 INTRODUCTION

## Purpose of this document

- 1.1** The Horsted Keynes Neighbourhood Development Plan (NDP) covers the civil parish of Horsted Keynes within Mid Sussex District. A map of the area is shown in Figure 1 below. It is a rural parish set within attractive countryside forming part of the High Weald Area of Outstanding Natural Beauty.



*Figure 1: The Plan Area*

- 1.2** This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Horsted Keynes Neighbourhood Development Plan.

**1.3** The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.

### **Timeline of the NDP**

**1.4** The NDP has had a long gestation period as shown on the timeline in Table 1 and explained in more detail below. This process has been lengthy largely because the scale and location of future housing development in the parish has been an unusually difficult and contentious issue, despite a range of consultative efforts aimed at building a consensus in the local community.

**1.5** An earlier version of the NDP was the subject of Regulation 14 public consultation in April – May 2016. It was then formally submitted for examination in November 2017. Unfortunately, in June 2018, the appointed Examiner raised some significant concerns about apparent lack of compliance with EU obligations on sustainability appraisal and its application to the assessment of “all reasonable” potential housing sites. These concerns would have led to the submitted plan failing to comply with the statutory basic conditions for neighbourhood plans. The plan was eventually withdrawn by the Parish Council in December 2018.

**1.6** The Parish Council decided to resume work on the NDP early in 2019, specifically addressing the concerns raised by the examiner and also the need to provide sufficient housing to meet strategic requirements set out in the (by now adopted) Mid Sussex District Plan. A consultant was appointed to gather and assess further information on potential development sites, including discussions with site owners /promoters and technical consultees. A public meeting to report progress was held in May 2019.

**1.7** Progress towards consultation on a revised and updated plan was affected by MSDC’s parallel statutory consultations on their Site Allocations DPD (October-November 2019 and August-September 2020) and then the covid-19 pandemic from early 2020 onwards. Nevertheless, a revised and updated NDP was considered by the Parish Council in July 2020 and Regulation 14 consultation on it took place between October and December 2020. The response was then reported back to the Parish Council in March 2021.

**1.8** The regulation 14 comments had an overwhelmingly negative view of the allocation of site SA29 within the MSDC DPD and the support for this document contained within the NDP. As a result, a new Neighbourhood Plan Steering Group (NPSG) was formed, comprising Parish Councillors and members of the community, to review Sites Allocations within the DPD and find a way forward for the NDP. Over the ensuing months whilst we waited for the end of Covid-19 restrictions and the conclusion of the Examination of the MSDC DPD, the NPSG reviewed Site Appraisals and consulted with MSDC on the possible ways forward for the NDP.

**1.9** In the interests of transparency, and to encourage community participation, detailed notes and minutes were published for meetings and conversations with outside agencies.

- 1.10** By Early 2022 it became clear that sites SA28 and SA29 would remain in the MSDC DPD and that when the DPD is made, there would be no more requirement for Horsted Keynes to supply additional allocations as the District Plan target for new dwellings in Horsted Keynes in the plan period to 2031 will have been met. Accordingly, it was judged appropriate to focus the subsequent drafts of the NDP on the issues still under consideration, by removing all site assessments and the sustainability appraisal of the sites from the NDP. This does not preclude us from revisiting allocations in the future should there be additional demand placed upon the Parish, but at this moment in time the Parish, and therefore the NDP, have no requirement to consider this most controversial topic.
- 1.11** The structure of this Consultation Statement reflects the process by which the current NDP has evolved, as described above.
- 1.12** The policies contained in the NDP have been developed as a result of a range of interactions and consultations with the community and businesses within the parish. This has taken place over more than eight years and has included surveys, public exhibitions, workshops, use of web-based information and social media, and face-to-face activity.
- 1.13** From 2014 to 2016, engagement on the emerging neighbourhood plan was overseen and co-ordinated by the HKNP Steering Group which was formed to lead the NDP. Views and interactions from this process led to the Vision and Objectives in Section 3 of the NDP, and subsequently therefore form the basis for many of the planning policies set out in Sections 4 to 9 of the NDP.
- 1.14** Since withdrawal of the earlier “2016” NDP, work has been overseen by the Parish Council, who have discussed it in public meetings open to the public either personally or by Zoom. Work on the revised and updated NDP since early 2019 has focused on housing development issues, but other policies have been revised and updated too.

Date	Action
July 2012	Horsted Keynes NDP area designated by MSDC
2012-2013	Local surveys to gather views on key issues in the parish
April 2014	HKNP Steering Group formed to oversee preparation of draft NDP
April 2014-April 2016	HKNP Steering Group gathers evidence and arranges public consultation events to assist preparation of draft NDP (see section 2 for more detail)
April –May 2016	Regulation 14 consultation on draft NDP
November 2017	Submission of draft plan to MSDC under Regulation 15
December 2017- January 2018	Regulation 16 consultation arranged by MSDC
March 2018	Mid Sussex District Plan formally adopted by MSDC
June 2018	Examiner raises significant concerns on whether the draft NDP meets the basic conditions

December 2018	Parish Council withdraws submitted plan
January 2019	Work resumes on NDP to address examiner’s concerns (see section 5 for more detail) and update evidence base
May 2019	Public meeting to review progress on NDP
October-November 2019	Regulation 18 consultation on Mid Sussex Site Allocations DPD
July 2020	Parish Council approves revised and updated NDP for Reg 14 consultation
August-September 2020	Regulation 19 consultation on Mid Sussex Site Allocations DPD
October-December 2020	Regulation 14 consultation on revised NDP
March-April 2021	Consideration of Regulation 14 consultation and establishment of the Neighbourhood Plan Steering Group (NPSG)
May-June 2021	NPSG review the Site Appraisal.
July-November 2021	Awaiting an indication of the results of the MSDC DPD
December 2021 - July 2022	Reviewing/responding to the Regulation 14 comments. Preparing documents for Regulation 15 submission.

**TABLE 1: TIMELINE OF KEY EVENTS IN THE PREPARATION OF THE HORSTED KEYNES NDP (Covid-19 pandemic period shaded)**

### The overall approach to consultation

**1.15** Throughout the preparation of the NDP, we have tried to promote the widest possible engagement of the local community in planning for the future development of the parish. Our guiding principles have been:

- a) to commence community engagement early on, before we started drafting anything, and to seek a clear understanding of those issues and concerns which are of most importance to the local community.
- b) as work progressed on the plan, to offer further opportunities for comment as a draft vision and objectives, and then planning policies, were worked up and a draft plan prepared.
- c) to make direct contact with key groups in the local community (such as businesses, clubs and societies) and external consultees. There has also been regular liaison with Mid Sussex District Council’s planning department.
- d) to tap into the knowledge and experience available in the local community wherever possible, by making the process as open and inclusive as possible.
- e) through all the above actions, to meet the statutory requirements for public engagement set out in the Neighbourhood Plan Regulations.

## 2 NDP 2016: CONSULTATION ACTIVITY 2012 - 2016

### Community Surveys

**2.1** Soon after designation of the neighbourhood plan area in 2012, the Parish Council embarked on local survey work to gain a better understanding of local concerns and priorities. Initial work was undertaken to consider the 2008/2009 Village Plan (it was intended that the Neighbourhood Plan would build upon this comprehensive document) and the following surveys undertaken in 2012/13:

- Autumn 2012 - **People, Businesses and Housing** to which there were 322 responses (about 56% of households) on questions covering the population and social composition of the parish, employment patterns, economic prospects, broadband connections and use of IT, housing provision and future housing needs, and specialist housing provision for older people.
- Spring 2013 - **Crucial Infrastructure** to which 197 (about 39% of households) responded on questions covering use of the post office, shop, pubs and social club, village halls, primary school, pre-school, children and youth activities, parks and open spaces, and public rights of way.

### The HKNP Steering Group

**2.2** The HKNP Steering Group was set up as a working committee of the Parish Council, consisting of parish councillors, but also allowing non-councillors who lived, worked or owned land or property within the parish to join. All meetings were minuted and these minutes were made publicly available. The chronology of the HKNP Steering Group is as follows:

- April 2014 - the HKNP Steering Group was formed, consisting of Councillors Kenton Lawton (Chair), Mark Syrett and Peter Whatling and local residents Terry Higham and Simon Doherr.
- May/June 2014 - Simon Doherr stepped down and Councillor Marjorie Fritz joined.
- July 2014 - Councillor David Colville joined, together with local resident Angela Newman.
- January 2015 - Councillor Mark Syrett resigned.
- March 2015 - Councillor Kenton Lawton resigned. Peter Whatling took over as Chair.
- May 2015 - Councillors Kirk, Vince and Webster joined.
- May/June 2015 - Councillor Marjorie Fritz and Angela Newman resigned.
- May 2015 - Peter Whatling stood down as Chair.
- June 2015 - at the Parish Council meeting it was reaffirmed that the HKNP Steering Group should be a Committee of the Parish Council who provide support and accept overall responsibility for the Neighbourhood Plan.
- June 2015 - Councillor David Colville elected as Chair.
- July 2015 – Councillor Terry Higham resigned.



- July 2015 – Parish Council Chairman Loz Allan wrote to Peter Whatling in July to notify him that the Parish Council had agreed to restrict membership of the HKNP Steering Group to elected Councillors. Peter Whatling was duly removed from the SG.
  - January 2016 - Councillor David Colville resigned his membership of the HKNP Steering Group and role as Chair
  - April 2016 - Councillor Sarah Webster elected as Chair
- 2.3** Whilst the composition and personnel of this group changed often over the months, the focus of its work remained fixed on:
- (a) widening and deepening community engagement on key planning issues facing the parish.
  - (b) developing a vision for the future and the objectives by which it might be achieved and seeking public views as they evolved.
  - (c) making a “call for sites” to landowners who could offer potential development sites for consideration and appraisal. The method for consideration of these sites (the sustainability appraisal) and its application to these sites were then also subject to public consultation. Some of these sites have also been proposed to, and assessed by, MSDC as part of their Strategic Housing Land Availability Appraisal (SHLAA) process.
  - (d) preparing a draft plan for consultation.
- 2.4** All decisions throughout the process of preparing the NDP were taken by the full Parish Council, with councillors declaring their interests as appropriate.
- 2.5** The SG wound up in spring 2016. Since then, work has been overseen by the Parish Council, who have discussed NDP matters in public meetings open to the public, either personally or -since the pandemic- by Zoom. All Parish Council meetings are minuted and published online.
- 2.6** The latest Neighbourhood Plan Steering Group (NPSG), formed in April 2021, reverted to a mix of Parish Councillors and members of the community. Notes were published for all working meetings and phone conversations with other agencies. Full meetings of the NPSG were minuted, and members of the public were encouraged to contribute throughout these meetings.

## **Summary of engagement process**

- 2.7** The HKNP Steering Group prepared an action plan and associated timetable to help ensure that all groups were given an opportunity to engage. This was updated throughout the early months of the process to identify any gaps or under-representation from particular stakeholder groups and ensure that plan preparation remained on track.
- 2.8** A number of consultation events and interaction were carried out with the community by members of the group, ranging from individual or group conversations up to large scale events involving the whole community. Activities have been divided into different categories and detailed in the remainder of the Consultation Statement.

**2.9** The key stages in the process of public engagement were as follows:

- Stakeholder consultation with local service providers, and clubs and societies (July-September 2014)
- Consultation on draft vision and objectives, and sustainability criteria (September-December 2014)
- Community engagement event in Village Hall (January 2015)
- A series of community workshop sessions (September 2015) focusing on potential development sites
- Two "calls for sites" (in November 2014 and July 2015) and dialogue with landowners on the potential development sites they had put forward

**2.10** In June 2014, the HKNP Steering Group initiated a monthly article in the village Parish and Parishioner (P&P) magazine which is delivered to every household in the Parish. This continued until January 2016. The information published in the P&P was supplemented in July 2014 by the creation of Facebook and Twitter accounts and the use of the Parish Council website to publish information and receive comments back from the public. Indeed, the Parish Council website has a whole section devoted to the NDP at <http://horstedkeynesparishcouncil.com/neighbourhood-plan/> .

**2.11** In July and August 2014, the HKNP Steering Group identified a number of stakeholders that would be approached as part of the consultation process:

- Medical Practice / Dental
- Metrobus / Dial a Ride
- Abbeyfield / Bluebird Healthcare
- Local Housing Associations
- WSCC Social Care Director
- Parish Churches - representation
- Pre School families
- 1st Steps families
- St. Giles School
- St. Giles Parent-Teacher Association (PTA)
- Brownies
- Lunch Club
- Businesses

**2.12** A third survey was initiated in 2014 when members of the SG collected views from First Steps; Pre-school; WI; Saturday circuit training class; and weekend shoppers at the village store to assist in developing a **Vision** (what sort of place local people would like Horsted Keynes to be in 2031) **and Objectives** (what steps would need to be taken to deliver the vision) >Views are summarised in Table 2 below

<b>Vision statement item</b>	<b>Important</b>	<b>Not important</b>
Facilities (shop, post office, and pubs) have been retained	119	0
An attractive, rural village centred round the existing village green	115	2
Fast broadband and good mobile telephone reception	110	5
All sports and other green spaces within the village have been retained and additional areas have been developed (community orchard, community gardens, meadowland areas, new allotments)	104	1
St Giles School has continued to thrive and expand	104	5
Footpaths, recreational areas, children’s playground, outdoor gym for adults have been extended or developed	102	2
Sufficient parking has been provided in new residential areas to avoid significant additional parking within existing village	101	11
Traffic managements have been installed to regulate on-street parking and improve road safety	90	13
Bus service has been retained	85	7
Housing has increased by 15% comprising mainly of small and medium sized family properties	63	24
A new small, non-licensed café has been established	64	31

**TABLE 2: LOCAL VIEWS ON THE CONTENT OF A VISION FOR THE FUTURE OF HORSTED KEYNES (2014)**

**2.13** An opportunity to express any other particular concerns was also provided. The total number of comments received on a range of topics is set out in Table 3 below:

<b>Subject of Comment</b>	<b>Number Recorded</b>
First time buyer housing/affordable housing	9
Speeding / traffic calming	8
Retention of facilities	7
Retain and extend bus service	5
Preserve green spaces	3
No urbanisation – traffic lights etc.	3
Too much development	3
Elderly care	2
Parking	1
Litter	1
Upkeep of church	1
Community spirit	1
Maintain balanced age profile	1
Improve broadband	1

**TABLE 3: CONCERNS RAISED AT COMMUNITY CONSULTATION IN 2014**

**2.14** Comments were requested via Facebook, Twitter, Web Site, emails and letters delivered to the Parish Office.

**2.15 In September 2014 a draft vision was published.** It was included on the Parish Council website, in the P&P (October and November 2014). Comments were welcomed and received. The vision was:

*'In 2034 Horsted Keynes remains an attractive rural village, centred on the existing village green, providing a safe and convenient environment for the whole population. The village and its surroundings attract visitors from all over the region who contribute significantly to the ongoing viability of the community assets.*

*General economic development has resulted in a demand for additional accommodation throughout the region. The arrival of fast broadband and good mobile telephone reception has allowed the development of new businesses within the parish and increased the amount of home working undertaken. Housing within Horsted Keynes has increased by approximately 15% comprising mainly more affordable small and medium sized family properties, generally on developments beyond the current village boundaries. The addition of new families has offset the tendency towards an ageing population and maintained the demographic balance in line with that of the region as a whole.*

*The increasing population has improved the viability of the consumer businesses within the village, enabling the retention of all the current facilities (shop, post office and pubs) and the establishment of a new small, non-licensed, café. Just outside*

*the village centre the Bluebell railway now links to both East Grinstead & Haywards Heath.*

*St Giles School has continued to thrive and the increased village population has resulted in a significant rise in the school roll, the majority of whom are resident within the parish.*

*All existing sports and other green spaces within the village have been retained and supplemented by additional areas within the new residential developments, including a community orchard, community garden, meadowland areas and new allotments. Community Infrastructure Levies have also enabled the improvement of existing footpaths and recreational areas, including a new and extended children's playground and the provision of out-door gym equipment for adults.*

*The village has retained its bus service and some road improvements and traffic management measures have been installed to regulate on-street parking and improve road safety. The new residential developments have been spread throughout the parish looking where possible to minimise additional through traffic, and sufficient parking has been provided for within these areas to avoid the generation of significant additional parking within the existing village.'*

**2.16** The following objectives were also published:

- 1. Conserve and enhance the environment of the village in order to maintain its distinct rural identity and outstanding landscape setting.*
- 2. Maintain and enhance existing and establish new local services and facilities.*
- 3. Increase the population at a similar rate to that which has occurred in recent years (average 5 properties per year, around 100 properties in total) whilst maintaining the current age.*
- 4. Support local businesses and provide enhanced employment opportunities within the parish including home working.*
- 5. Maximise use of the local bus service to improve its viability.*
- 6. Minimise the impact of road traffic on the village through the provision of limited traffic calming and adequate parking in any new developments.*
- 7. Minimise the adverse environmental effects of new development and provide energy reduction and sustainable energy opportunities for the whole village.*

**2.17** Following consultation on the vision and objectives in 2014, concerns were raised about Objective 3. At a consultation event held in January 2015, a new Objective 3 was presented and views sought:

- 3. Increase the population and meet their 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.*

Following further comments, this revision to the objective was then subsequently amended to read:

3. *Meet Horsted Keynes's 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.*

**2.18** Following ongoing consultation in 2016, the vision was amended as follows:

*'In 2031 Horsted Keynes remains an attractive rural village, centred on the village green, and is a desirable place to live, work and visit. It has a thriving local economy and is able to sustain sufficient essential services and facilities to meet most local needs. Homes are available for all stages of life and circumstances and there is a strong sense of local community which contributes to low levels of crime.*

*Development has taken place in a sustainable way, at a scale and form that preserves the distinctive rural character, landscape and community ethos.'*

**2.19** This revised vision and revised Objective 3 were included in the Pre-Submission Version of the Neighbourhood Plan.

## **Sites consultations**

**2.20** During August and September 2014, the sustainability criteria used to assess possible site allocations were developed and published.

**2.21** A **public "call for sites"** was put out in **November/December 2014**, inviting landowners and site promoters to put forward sites for consideration for possible future housing development. This was published on the Parish Council website and in the P&P and Mid Sussex Times. This resulted in 24 sites being submitted which were assessed against the sustainability criteria – 2 sites were assessed as 'unavailable'; 3 sites as 'undeliverable'; 10 sites as 'unsustainable or unsuitable for development'; and 6 sites as 'potentially sustainable' or 'sustainable'. The remaining 3 sites were submitted for use as potential mobile phone mast sites and were assessed separately.

**2.22** An **open morning consultation event** was held in **January 2015**. An A5 flyer (copy below) was delivered to every household in the Parish advertising this event. Other advertising was achieved via the Parish Council web site, Facebook and Twitter. At the event, exhibition boards displayed information gathered to date with initial analysis. The draft vision, objectives, policies and sustainability criteria, together with the 24 sites submitted in the first Call for Land were presented and the 300+ people who attended were asked for their comments.



- 2.23** In respect of the sites, people who attended were presented with the sustainability assessments and maps showing where each site was within the Parish. For each of the six sites that were designated 'potentially sustainable' or 'sustainable', the potential benefits and issues were set out. General comments were invited on all the material on display, and post-it notes were attached by people saying 'agree', 'not agree', etc.
- 2.24** The January 2015 open event further raised the profile of the NDP in the village. More residents became engaged and HKNP Steering Group meetings were well attended by the public. The proposals for just one or two large scale developments were very unpopular. There was concern that Horsted Keynes would lose its identity and rural character if large estates were built. Support was expressed for smaller scale developments spread around the village.
- 2.25** In February 2015, the HKNP Steering Group was being inundated with comments and letters questioning the plan and site assessments. This not only took a huge amount of time to respond to, particularly in respect of what the HKNP Steering Group considered to be inaccurate statements. It was agreed to develop a set of **Frequently Asked Questions** (FAQs) which would be published on the Parish Council website which directed everyone to. It was also agreed that the HKNP Steering Group would only respond to genuine issues which are not covered by these FAQs.
- 2.26** The first FAQs were uploaded onto the Parish Council website in mid-March 2015. The FAQ web page was replaced towards the end of 2015 by updated FAQs. The FAQs ceased to be updated by early-2016, as the emphasis was on building all the material required for Pre-Submission.

**2.27** In February 2015, **technical advice** was sought from **WSCC Highways** in respect of access arrangements for the short-listed housing sites. This advice was taken because of concerns raised by a number of people in the community regarding highway matters on a number of the sites. This solely desktop advice (i.e., no site visits were made) was provided on the following sites:

- *HKNP002 - Police House Field*
- *HKNP012 - The Old Rectory, Church Lane*
- *HKNP013 - Jeffreys Farm Buildings*
- *HKNP014 - Land to North of Farm Buildings (A), Jeffreys Farm*
- *HKNP016 - Sugar Lane Field*
- *HKNP017 - Jeffreys Farm Field*

Further updated advice from WSCC Highways was provided in July 2015, including advice on another site off Hamsland (HKNP003)

**2.28** Another issue raised by a number of local people was the question of whether there was a restrictive covenant on site 017. On 1st March 2015 the covenant holder confirmed that the covenant did not permit the erection of any building of any type on the land other than for a sports pavilion with storage and toilet facilities. The Sustainability Assessment was not updated with this information at this time.

**2.29** A **second call for sites** in August/September 2015 resulted in four new sites being submitted which were also assessed against the sustainability criteria - two sites were assessed as 'unsustainable' and two sites as 'potentially sustainable' or 'sustainable'. Following the submission of site HKNP025 (rear of St Stephen's Church), site HKNP003 which was adjacent to it was reassessed. For the consultation in January 2015, site HKNP003 was assessed as "red" due to lack of vehicle access; however, with the submission of site HKNP025 and the potential for vehicle access to HKNP003 via that site, HKNP003 was designated "amber". However, it was noted that access was dependent upon HKNP025 being designated for development and the related issue of the capacity of Hamsland to accommodate further vehicular traffic remained.

**2.30** The Sugar Lane sites were re-assessed in September 2015 in order to take account of the following considerations:

- the restrictive covenant on HKNP017;
- their location to the west of Sugar Lane which currently acts as the defensible boundary for development within the village to the west and the difficulty of containing development once it is breached;
- further advice from West Sussex County Council (WSCC) Highways regarding access to the sites and pedestrian safety along Sugar Lane

**2.31** Informal officer advice by WSCC Highways stated that the existing access point had limited visibility and limited scope to improve it. Provision of an alternative access point to the north was not considered to represent a demonstrably more feasible or safer solution.

**2.32** further discussions with MSDC concluded that the only possible residential development that may be achievable at Jeffreys Farm is a small, courtyard-style scheme of approximately 6 dwellings incorporating the existing farm buildings. This would still have potential highway access and safety issues. It is considered that the breach of the defensible boundary



currently provided by Sugar Lane, coupled with the relatively limited contribution that the site would make to meeting the housing needs of Horsted Keynes, means the site would not support the objectives of the Neighbourhood Plan in a sustainable way.

**2.33** In view of this, all Jeffreys Farm/Sugar Lane sites were reassessed, and the outcome of this process was published on the Parish Council website. This resulted in sites HKNP014 and HKNP016, which were assessed as 'amber' in January 2015, changing to 'red' in September 2015, and site HKNP017, which had been assessed as 'green' in January 2015, also changed to 'red' in September 2015.

**2.34** In **September 2015**, a series of **workshops on potential housing development sites** were advertised in the monthly P&P magazine, on social media, announced at St Giles Church service, and on posters around the village. People were invited to sign up to attend. There were 10 workshops held at days and times to be as inclusive as possible. Each one was chaired by a Councillor and assisted by a volunteer to take notes.

**2.35** A booklet was prepared summarising feedback from the January 2015 open event and an update on site options. This booklet was delivered by hand to every dwelling in the parish at the end of August. See

<http://horstedkeynesparishcouncil.com/wp-content/uploads/2016/04/Consultation-Booklet-final-final.pdf>.

### WORKSHOP DETAILS

The workshops will be run on the following days and times at the Village Hall:

<ul style="list-style-type: none"> <li>• Saturday 12<sup>th</sup> September                             <ul style="list-style-type: none"> <li>• 9am to 11am</li> <li>• 11am to 1pm</li> <li>• 2pm to 4pm</li> </ul> </li> <li>• Tuesday 15<sup>th</sup> September                             <ul style="list-style-type: none"> <li>• 1:00pm to 3:00pm</li> </ul> </li> <li>• Wednesday 16<sup>th</sup> September                             <ul style="list-style-type: none"> <li>• 2:30pm to 4:30pm</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Thursday 17<sup>th</sup> September                             <ul style="list-style-type: none"> <li>• 8pm to 10pm</li> </ul> </li> <li>• Saturday 19<sup>th</sup> September                             <ul style="list-style-type: none"> <li>• 9am to 11am</li> <li>• 11am to 1pm</li> <li>• 2pm to 4pm</li> </ul> </li> <li>• Monday 21<sup>st</sup> September                             <ul style="list-style-type: none"> <li>• 8pm to 10pm</li> </ul> </li> </ul>
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**Please tell us which workshop you wish to attend.**

By email: [dcolville@btinternet.com](mailto:dcolville@btinternet.com)  
 By phone: 01825 791395

**Find out more:**  
[www.horstedkeynesparishcouncil.com/neighbourhood-plan](http://www.horstedkeynesparishcouncil.com/neighbourhood-plan)  
[www.facebook.com/YourVillageHK](https://www.facebook.com/YourVillageHK)  
[www.twitter.com/YourVillageHK](https://www.twitter.com/YourVillageHK)

**HORSTED KEYNES  
NEIGHBOURHOOD PLAN**




**SEPTEMBER 2015  
WORKSHOPS**

***Your Village/Your Future/Your Choice***

**2.36** Material presented at the workshops was prepared including maps, vision and objectives and detailed information on all sites which were or had been assessed as sustainable. See

<http://horstedkeynesparishcouncil.com/wp-content/uploads/2015/10/1015-September-workshop-material.pdf>.

**2.37** Some 170 residents attended one of the two-hour workshops in September 2015. Attendees were split at random into groups of around 8-10 people allowing everyone a full opportunity to ask questions, take part in discussion and express their views. Officers from MSDC attended a few of the workshops to answer questions. A questionnaire was provided to each participant and was used to provide a framework for the discussion. Completed questionnaires or substitute emails were received from 126 people including a small number who did not attend. The following common themes all came through strongly:

- Concern over road traffic, safety and parking.
- Need some affordable housing
- No large estates.
- Concerns about defensible boundaries to the village
- Don't open up any area of the village to uncontrolled development.
- Environmental concerns
- Avoid urbanisation: no street lights.
- Increased pressure on infrastructure.
- Change to dwelling size policy, with people favouring a requirement for more 2-bed and fewer 1-bed properties.

**2.38** Details of the events including documents presented, scribe notes and the full feedback report can be found at

<http://horstedkeynesparishcouncil.com/consultation-events/>.

Anonymised questionnaires were made available for public scrutiny at the Parish Office.

**2.39** In October and November 2015, the SG considered feedback from the workshops and held further consultations with landowners and MSDC.

## **Parish Council meeting to determine draft Site Allocations**

**2.40** The SG prepared detailed site allocation recommendations for consideration by the full Parish Council at a meeting on 8th December 2015. This meeting was well advertised on social media and the discussion material was made available to the public before the meeting via the Parish Council website.

**2.41** The Parish Council meeting considered the site allocation recommendations of the SG. The material can be viewed here

<http://horstedkeynesparishcouncil.com/pc-meeting-081215-np-site-allocation-recommendations/>.

A decision was deferred on Jeffreys Farm Buildings until further consultation had taken place with the landowners and MSDC.

- 2.42** No further monthly SG meetings were held from this point as it was felt necessary, given that the draft Neighbourhood Plan had reached a point where several key decisions needed to be made, that all NDP matters were discussed and decided by the full Parish Council. This therefore became the best opportunity for the public to ask questions and express their views.
- 2.43** Between mid-December 2015 and April 2016, further consultation was undertaken with landowners and MSDC about site allocations and overall housing numbers. Site allocations were completed at the meeting on 9th February 2016 with the decision to include Jeffrey's Farm Buildings.
- 2.44** A revised draft of the NDP was prepared for Pre-Submission Consultation (Regulation 14). Members of the public continued to attend Parish Council meetings to ask questions and make comments on the plan. The site allocations agreed by the Parish Council took into account workshop and other feedback in selecting smaller sites which would not lead to uncontrolled development, or breach defensible boundaries. Policy HK11 was included to deal with concerns raised by a number of members of the community about light pollution. Dwelling size Policy HK2 was amended to reflect a change in balance towards more 2-bed and fewer 1-bed dwellings. Policies HK15 and HK16 were adjusted to ensure that sufficient off-street parking would be provided for new dwellings and there would be no net loss in existing parking spaces.

### 3. NDP 2016: REG 14 CONSULTATION APR 16 - OCT 16

**3.1** The Pre-Submission Consultation (Regulation 14) was undertaken between 14<sup>th</sup> April and 26<sup>th</sup> May 2016 with the following arrangements to publicise the plan "in a manner likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area ", as required by the legislation;

- The draft plan was advertised in Parish & Parishioner magazine, Parish Council noticeboard, social media, a banner and posters around the village.
- Hard copies of the draft plan, the Sustainability Appraisal Scoping Report and the Sustainability Appraisal were placed in the Parish Office, the Martindale Centre, Horsted Keynes Village Stores, the Horsted Keynes Club and The Green Man and The Crown public houses.
- Copies of submission documents were placed on the Parish Council website together with details of how to respond and links to detailed site assessments and other background information.

<http://horstedkeynesparishcouncil.com/pre-submission-neighbourhood-plan-documents/>

- A dedicated email address was set up to receive responses and the Parish Office postal address provided for non-electronic responses.

**3.2** In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by letter or email. In addition, a range of parties that the HKNP Steering Group considered were likely to have an interest in the plan were also notified in writing. All these consultees are set out below:

<ul style="list-style-type: none"> <li>• Mid Sussex District Council</li> <li>• Natural England</li> <li>• Environment Agency</li> <li>• Historic England</li> <li>• Highways England</li> <li>• Network Rail (Kent, Sussex, Wessex)</li> <li>• West Sussex County Council</li> <li>• Horsham and Mid Sussex Clinical Commissioning Group</li> <li>• NHS Horsham and Mid Sussex</li> <li>• National Grid</li> <li>• Southern Gas Network</li> <li>• Southern Water</li> <li>• South East Water</li> <li>• Thames Water</li> <li>• UK Power Networks</li> <li>• Sutton and East Surrey Water</li> <li>• Sussex Police</li> <li>• Mobile Operators Association</li> <li>• British Telecom</li> <li>• BT Plc</li> <li>• EMF Enquiries - Vodafone and O2</li> <li>• EE</li> </ul>	<ul style="list-style-type: none"> <li>• Lindfield Rural Parish Council</li> <li>• Newtimber Parish Council</li> <li>• Poynings Parish Council</li> <li>• Pyecombe Parish Council</li> <li>• Slaugham Parish Council</li> <li>• Turners Hill Parish Council</li> <li>• Twineham Parish Council</li> <li>• West Hoathly Parish Council</li> <li>• Worth Parish Council</li> <li>• Adur and Worthing Councils</li> <li>• Colgate Parish Council</li> <li>• Lower Beeding Parish Council</li> <li>• Cowfold Parish Council</li>   <li>• Shermanbury Parish Council</li> <li>• Woodmancote Parish Council</li> <li>• Upper Beeding Parish Council</li> <li>• Ditchling Parish Council</li> <li>• Wivelsfield Parish Council</li> <li>• Danehill Parish Council</li> <li>• Forest Row Parish Council</li> <li>• Fletching Parish Council</li> <li>• Dormansland Parish Council</li> <li>• Felbridge Parish Council</li> <li>• Burstow Parish Council</li> </ul>
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<ul style="list-style-type: none"> <li>• Three</li> <li>• Homes and Communities Agency</li> <li>• Albourne Parish Council</li> <li>• Ardingly Parish Council</li> <li>• Ashurst Wood Village Council</li> <li>• Balcombe Parish Council</li> <li>• Bolney Parish Council</li> <li>• Burgess Hill Town Council</li> <li>• Cuckfield Parish Council</li> <li>• Ansty and Staplefield Parish Council</li> <li>• East Grinstead Town Council</li> <li>• Fulking Parish Council</li> <li>• Hassocks Parish Council</li> <li>• Haywards Heath Town Council</li> <li>• Horsted Keynes Parish Council</li> <li>• Hurstpierpoint &amp; Sayers Common Parish Council</li> <li>• Lindfield Parish Council</li> </ul>	<ul style="list-style-type: none"> <li>• Arun District Council</li> <li>• Brighton and Hove City Council</li> <li>• Crawley Borough Council</li> <li>• East Sussex County Council</li> <li>• Horsham District Council</li> <li>• Lewes District Council</li> <li>• Tandridge District Council</li> <li>• Wealden District Council</li> <li>• Surrey County Council</li> <li>• South Downs National Park Authority</li> </ul>
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**TABLE 4 - ORGANISATIONS NOTIFIED DURING NDP REG.14 CONSULTATION – APRIL - MAY 2016**

## Summary of representations

**3.3** In total, 111 representations were made. In summary, the most common points made were as follows:

- Disagreement with the spatial strategy in the NDP and specifically the fact that the quantum of dwellings allocated in the plan does not address the Objectively Assessed Housing Need (OAHN) figure in the MSDC document 'Housing and Employment Development Needs Assessment (HEDNA)', March 2015. This was related back to Objective 3 of the NDP in respect of meeting Horsted Keynes's housing needs over the plan period. However, it was recognised that, although a large site allocation was not considered to represent a sustainable option in the NDP, a more flexible approach to housing provision was needed. As such, Policy HK1 was amended to allow residential developments of no more than 10 dwellings on sites adjacent to the built up area boundary, provided they did not have a detrimental impact on the AONB and highways and clearly represented sustainable development.
- Some felt that there was no justification for smaller properties, with few people clearly intending to downsize and few young people interested in living in the quiet village. However, it was considered that the locally collected evidence from the community about the interest in downsizing, coupled with evidence from the Mid Sussex SHMA, justified a policy addressing this.
- There were many representations made about the various sites allocated and also about the potential to allocate other/larger sites, in particular the 'amalgamated' Sugar Lane sites. The input of WSCC as highways authority was questioned. As a result of this, their input was again sought following the Pre-Submission Consultation and this further clarified their position in respect of highways impact of particular sites.

- Many comments were made about the importance of the AONB. Following these comments, and those made by the High Weald AONB, an additional policy was included in the Submission Version NDP specifically requiring that development ensures that development in the AONB does not have a detrimental impact on it.
- Many commented on the need to allow appropriate small scale residential extensions outside the built up area boundary. Policy HK4 was duly amended to allow this but not to allow infill development outside the built up area boundary, which would be a lot more difficult to define

## **Follow up work after the first Reg 14 consultation in spring 2016**

**3.4** A number of those that made representations to the Pre-Submission Consultation process also considered that the Parish Council had not acted appropriately in taking forward the NDP. Following a recommendation by the Mid Sussex Standards Committee, the Parish Council employed Lindsay Frost, an independent planning consultant, to provide a report on the NDP process carried out by the Parish Council up to Pre-Submission Consultation stage. His report was presented at an extraordinary meeting of the Parish Council on 9th August 2016. The report identified a mismatch between the draft plan's vision and objectives and its site allocations policies. It also recommended some further work to be done before making any decisions on the way forward.

**3.5** The meeting was attended by a large number of residents who had the opportunity to question Mr Frost on his report. The report was published on the PC website ahead of the meeting and is available here:

<http://horstedkeynesparishcouncil.com/wp-content/uploads/2016/08/0816-Independent-Experts-Final-Report.pdf>.

**3.6** Between August and November 2016, the Parish Council contacted all landowners who had put forward land to find out if their land was still available, if there had been any fundamental changes, and whether it could be considered for a rural exception site. All land being considered for site allocation was still available and there were no offers for a rural exception site.

**3.7** At the same time, new planning consultants engaged to support work on the NDP, Troy Navigus Partnership, were asked to review all the representations made at Reg.14 Consultation stage, and to engage further with WSCC and with the High Weald AONB Committee, in order to make recommendations regarding possible changes to the NDP. WSCC Highways Department also visited the potential housing development sites again to assess any access and transport issues. All sites were reviewed, but there were no fundamental changes to assessments that had been made before.

**3.8** In November 2016, a report was prepared by Troy Navigus Partnership and presented at a public meeting. The report was made available on the Parish Council website a week before the meeting and the meeting itself advertised on the website and social media as well as the Parish Council noticeboard.

**3.9** The report, which can be found here:

<http://horstedkeynesparishcouncil.com/np-consultant-report-documents-1116/>

recommended allocation of the amalgamated Sugar Lane site as the safest way of addressing the Objectively Assessed Housing Need (OAHN) issue to the likely satisfaction of an Examiner.

**3.10** The report was presented by the consultant and then residents and councillors had the opportunity to question him. Following discussion, the Parish Council decided not to add the amalgamated Sugar Lane site into the NDP, but to retain the existing site allocations previously agreed. To address the perceived mismatch between vision and housing allocation numbers, the Parish Council agreed to add a new criteria-based policy to the NDP to allow new sites for up to 10 homes to be brought forward on land adjacent to the built up area boundary. This was added to an amended Policy HK1.

**3.11** The following revised NDP documents were approved by the Parish Council as a basis for formal submission to MSDC, under Regulation 15, on 14 November 2017 (Minute 055)

- [Horsted Keynes Neighbourhood Plan \(Nov 2017\)](#)
- [Horsted Keynes Housing Justification Paper \(Oct 2017\)](#)
- [Horsted Keynes Consultation Statement \(Oct 2017\)](#)
- [Horsted Keynes Basic Conditions Statement \(Oct 2017\)](#)
- [Horsted Keynes Sustainability Assessment Scoping Report \(Jan 2016\)](#)
- [Horsted Keynes Sustainability Assessment \(Oct 2017\)](#)
- [Horsted Keynes Response to Regulation 14 Representations \(Feb 2017\)](#)
- [Horsted Keynes Site Assessments](#)
- [Horsted Keynes Environment Agency Scoping Response \(Mar 2015\)](#)
- [Horsted Keynes Natural England Scoping Response \(Mar 2015\)](#)
- [Horsted Keynes List of Evidence \(Oct 2017\)](#)
- [Horsted Keynes Habitat Regulations Assessment \(Oct 2017\)](#)

## 4. SUBMISSION AND WITHDRAWAL OF THE NDP IN 2017-18

- 4.1** Following the November 2017 meeting of the Parish Council, the NDP and supporting documents were formally submitted to MSDC. The District Council published the plan for public consultation from 7 December 2017 to 1 February 2018 (an extended period to cover the Christmas - New Year holiday time) in accordance with Regulation 16. This included publication of a statutory public notice in the Mid Sussex Times.
- 4.2** All comments received were passed onto the Examiner, Mr Andrew Ashcroft, who was appointed in May 2018. The examination of the plan commenced in June 2018, whereupon the Examiner raised a number of points of concern, which were explored at a meeting/teleconference on 26<sup>th</sup> June 2018 as follows:
- The extent to which the Sustainability Appraisal (SA), provided with the plan, meets EU obligations
  - The NDP does not significantly boost the housing supply (as required by national and local planning policy) and the SA did not properly consider “reasonable alternative” sites, or justify its chosen approach, which undershoots the MSDC development guideline
  - A range of development options need to be considered on some sites, not just one “amalgamated site”
  - The relationship of policy HK1 to local planning policy is unclear in respect of “unspecified housing sites adjacent to the settlement boundary”
- 4.3** These concerns together led the Examiner to conclude that the plan would be unlikely to meet the basic conditions and so could not be recommended to proceed to referendum. As a result, the Parish Council eventually decided to formally withdraw the submitted plan in December 2018 and to engage a new planning consultant to review all relevant matters, with a view to amending the plan and formally resubmitting it to MSDC for further consultation, examination and a referendum.
- 4.4** In addition to the matters raised by the Examiner, the passage of time meant that a number of other matters also need to be considered as part of the process of reviewing and updating the NDP:
- Updated national guidance in National Planning Policy Framework (NPPF) July 2018 and February 2019
  - Adoption of the Mid Sussex District Local Plan (March 2018)
  - Further work by MSDC on potential housing development sites in its Site Allocations Development Plan Document
  - Further sites submitted as part of the SHELAA process at MSDC
  - The Habitat Regulations Assessment (HRA) –European Court of Justice (ECJ) judgement in *People over Wind and Sweetman v Coillte Teoranta (Ireland)* and its impact on appropriate assessments under the Habitats Directive 92/43/EEC
  - Any other necessary updating and “tidying up” of the NDP
  - Updated supporting documents: Sustainability Appraisal, Habitat Regulations Assessment, Basic Conditions Statement and Public Consultation Statement



## 5. NDP 2020: CONSULTATION ACTIVITY 2019 - 2020

**5.1** The new consultants, Lindsay Frost Consulting Ltd., began work in February 2019 on all the matters set out in paragraphs 4.2 and 4.4 with a particular focus on:

- reviewing all the potential housing development sites, including meetings with landowners and site promoters to understand their current position and then subjecting sites to Sustainability Appraisal
- discussions with MSDC planning officers and the AONB Unit on the planning merits of various potential housing development sites
- drawing conclusions on the ability of the NDP to meet the housing development guideline figure for the period 2014-2031 in policy DP6 of the recently adopted Mid Sussex Local Plan (69 dwellings, also taking into account completions and commitments since 2014)
- updating the draft NDP to reflect conclusions on the above matters, and on other matters needing updating

**5.2** Progress on this work was reported to an Extraordinary General Meeting of the Parish Council, open to the public, held in the village on 23 May 2019. The meeting attracted a capacity audience to the Martindale Centre. The report, and an addendum, are online at:

<https://horstedkeynesparishcouncil.com/wp-content/uploads/2020/03/20190523-Extraordinary-Meeting-Next-Steps-.pdf>

<https://horstedkeynesparishcouncil.com/wp-content/uploads/2020/03/20190523-Extraordinary-Meeting-Next-Steps-2.pdf>

**5.3** The report's conclusions were that:

- It is important that robust housing provision is made in the parish to meet the strategic housing requirements in the District Plan. This will require additional provision beyond that identified in the withdrawn NDP.
- MSDC are following up the District Plan with a Site Allocations Development Plan Document (DPD), which will identify development sites to deliver the strategy set out in the adopted District Plan. Therefore, if sites are not provided by towns and parishes through the neighbourhood plan process, it is likely that they would be provided instead by MSDC in their DPD.
- If provision is made through the NDP, then work so far suggests that the sites which perform best on overall sustainability are sites 68 (farm buildings at Jeffrey's Farm -6 dwellings), 184 (rear of St. Stephen's Church, Hamsland – 30 dwellings) and 216/807 (Land rear of Old Police House, Birchgrove Road -30 dwellings) which, together with existing completions and commitments, would ensure that the strategic housing requirement was met
- With the setting up of a Community Land Trust in the parish, it is worth considering a new planning policy to help promote community-led housing specifically to meet local needs

Following a public questions session, these conclusions were discussed and accepted by the Parish Council.

- 5.4** Over the summer and autumn of 2019, the consultant continued technical work on some issues raised during the public questions session on May 23. In particular, concerns were raised at that meeting concerning access and parking arrangements for the St Stephen's Church site and the Old Police House Field site. The consultant arranged further meetings with the promoters of these sites and with WSCC Highways. Both site promoters carried out additional surveys and technical work. This led to formal pre-application discussions with WSCC Highways. The outcome of this work was that there do not appear to be any issues which would present a technical barrier to their allocation on highway grounds.
- 5.5** A petition organised by the Hamsland Action Group with 330 signatories was submitted to the Parish Council and considered by them on 10 September 2019. The petition opposed any development on land at the rear of St. Stephen's Church and inclusion of the site as a development allocation in the NDP. The Parish Council response was that assessment work on the site, and more generally on the NDP, was still continuing.
- 5.6** Meanwhile, MSDC were progressing their Site Allocations DPD "Preferred Options" document as a basis for Regulation 18 consultation. MSDC officers advised that it would not be appropriate to have overlapping public consultation periods between the DPD, and any neighbourhood plan in the district, as this risked causing confusion and pressurised deadlines for the public and consultees in trying to respond to two separate documents at around the same time. The DPD was approved for consultation between between 9<sup>th</sup> October and 20<sup>th</sup> November 2019. The draft plan proposed two allocations of land for housing development in Horsted Keynes:
- SA28 Land South of the Old Police House, Birch Grove Road (25 dwellings)
  - SA29 Land South of St. Stephen's Church, Hamsland (30 dwellings)
- 5.7** The Parish Council considered its response to the DPD consultation at a meeting on 12 November 2019. Since these proposed allocations were in line with the position taken by the Parish Council at the May 2019 meeting, it resolved as follows:
- The Parish Council supports proposed allocations SA28 (Land south of Old Police House, Birchgrove Road) and SA29 (Land at rear of St. Stephen's Church, Hamsland), subject to continuing discussions on the detailed planning policy criteria to be applied to the consideration of any future planning applications on these sites, and any additional issues raised during the current DPD consultation.*
- 5.8** However, MSDC's work did not - in addition - lead them to propose allocation of the farm buildings site at Jeffrey's Farm, as recommended to the Parish Council in May, because of "difficulties in achieving safe access". The promoters of development at Jeffries Farm raised concerns that these difficulties in using the existing farm track quoted in MSDC's site analysis were based on incorrect information about site ownership and legal restraints and on the options for achieving adequate visibility for vehicles entering and leaving the site from Sugar Lane. In response, MSDC officers indicated that these concerns would be considered, alongside all other views received, as part of the DPD Regulation 18 consultation process.
- 5.9** Plans to finalise revised draft NDP documentation, and to approve them as a basis for Regulation 14 consultation, were delayed until early 2020 and then overtaken by the arrival of the covid-19 pandemic, with a first lockdown and cessation of regular parish council meetings.

- 5.10** The Government quickly made temporary legal arrangements for Parish councils to meet online through the Coronavirus Act 2020, and a range of associated regulations and guidance, which were regularly revised and updated as the pandemic progressed. Specific guidance on public consultation in connection with neighbourhood planning was published by Government on 13 May 2020. In summary, this guidance indicates:
- An overriding need to avoid any action which may contribute to the spread of coronavirus
  - A strong focus on online methods of consultation
  - No longer a legal requirement to make hard copies of documents available for public inspection
  - Exploring other “targeted methods” to try to reach people who do not have access to information online via computers or smartphones
- 5.11** The following draft documents were considered by the Parish Council at an “e-meeting” held over Zoom on 30 June 2020, to which the public had online access and could participate by asking questions:
- The draft NDP (with a number of new and revised planning policies)
  - Site Assessment of “realistic development options”
  - Sustainability Appraisal (incorporating Strategic Environmental Assessment)
  - Updated evidence base
  - Habitat Regulations Appraisal
- 5.12** The re-drafted Neighbourhood Plan’s proposed housing strategy was 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. Together with existing completions and commitments since 2014 (7 dwellings) and a contribution from C2 residential institution at Westall House, (based on the guidance in the DCLG Housing Delivery Test Measurement Rule Book - 20 units at a ratio of 1.8 - 11 dwellings). This provides an overall total of 73 dwellings. Therefore, no further allocations were necessary to meet the strategic requirement.
- 5.13** With some small amendments, the various documents were approved by the Parish Council as a basis for Regulation 14 consultation. Further HKPC meetings on 14 July and 8 September 2020 agreed detailed consultation arrangements consistent with the continuing covid-19 restrictions. Once again, it was necessary to avoid overlap with MSDC’s second (regulation 19) consultation on the Site Allocations DPD held from 3 August to 28 September 2020. Accordingly, the revised NDP was subject to eight weeks consultation from 12 October to 7 December 2020. The detailed consultation arrangements are set out in the next chapter.

## 6. NDP 2020: REG 14 CONSULTATION OCT 20 – MAR 21

- 6.1** An eight week period of consultation was held from 12<sup>th</sup> October to 7<sup>th</sup> December 2020. The range of methods used to publicise the plan, and to seek views on it, over the consultation period are set out below. These were significantly affected by the need to comply with the covid safety requirements operating at the time.

Consultation method	Comments
<p>1. Post the NDP and all supporting documents online on the HKPC web site and invite comment, preferably online</p>	<p>This was the main channel by which the neighbourhood plan was publicised, and comments submitted (although comments could also be posted back to HKPC by hard copy letters)</p> <p>All the NDP documents were posted and downloadable for easy reference from 5 October (a week before the formal start of the consultation period) providing more extended access to them</p> <p>All publicity material directed people to the web site as far as possible</p>
<p>2. Extensive articles on NDP consultation in "Parish and Parishioner" magazine (the "P&amp;P"), and circulated to all residents and businesses in the parish (approx. 650) and also made copies available in the local shop, pubs, social club and churches</p> <p>Articles were placed in the September, October, November and December/January issues of the "P&amp;P"</p> <p>The P&amp;P is also published online at <a href="http://www.stgileschurchhorstedkeynes.org.uk/documents/p+p.pdf">http://www.stgileschurchhorstedkeynes.org.uk/documents/p+p.pdf</a></p>	<p>The "P&amp;P" is circulated to all residents and businesses in Horsted Keynes parish (approx. 650 in total) and copies were also made available via the local shop, pubs, social club, and churches. This will enable it to reach those who are not online.</p> <p>Additional copies of the "P&amp;P" articles were printed as a separate leaflet and made available in local outlets.</p> <p>The article for the October issue of "P&amp;P" is set out below.</p>
<p>3. Parish Council News – a regular online news update service with over 200 subscribers</p>	<p>There were regular updates on Neighbourhood Plan consultation matters throughout the period from July to December 2020, with 8 separate notifications to subscribers over this period</p>
<p>4. Direct letter/e-mail to notify all interested parties who have previously expressed views on the draft NDP including those based outside the parish (such as businesses, landowners and developers)</p>	<p>HKPC maintains a database of all individuals and organisations who have previously expressed views on the NDP.</p> <p>A simple notification e-mail or letter was sent, inviting them to comment and referring them to the information available on the HKPC website.</p>

<p>5. Direct letter/e-mail to all statutory consultees **, such as Mid Sussex DC, West Sussex CC, surrounding parishes, High Weald AONB Unit, Environment Agency, Historic England and Natural England</p>	<p>This is a statutory requirement and can be done by e-mail or letter, notifying consultees of the NDP consultation, referring them to the website, and inviting comment</p> <p>(E-mail was the preferred method, as responders from most statutory consultees were "working from home" over the consultation period)</p> <p>In total (items 4 and 5), some 74 direct notifications were sent</p>
<p>6. Send a hard copy of the NDP, and supporting documents, to Mid Sussex DC as local planning authority</p>	<p>This is a statutory requirement but, in the circumstances of the covid pandemic, MSDC indicated that they would be satisfied with electronic notification and access to documents via the HKPC web site. This was done.</p>
<p>7. Post material on "HK Gossip" Facebook page</p> <p>This group has more than 800 members</p>	<p>This Facebook page already has a section on the NDP and information on the consultation arrangements was posted there and readers directed to the HKPC web site, where they were able to see all the relevant documents.</p> <p>The PC made five postings over the consultation period</p> <p>It was stressed that comments on the draft NDP should be sent in via e-mail or letter, as detailed on the HKPC web site, rather than in a social media posting</p>
<p>8. Provide material to local clubs and societies and ask them to publicise it via their own channels, including online and social media</p>	<p>As in 6 above, material in electronic form was sent to clubs and societies in the parish with a request that they publicise it via their own online and social media outlets</p>
<p>9. Send out hard copies of NDP documents on request to a limited number of people who do not have access to computers or smartphones</p>	<p>A small number of hard copies were printed off, so that those without online access could see the consultation documents on request.</p> <p>In the event, only one request was received from, and a set of documents provided to, a village resident</p> <p>Covid safety considerations were observed</p>
<p>10. "Phone in" query or information number</p>	<p>HKPC publicised a phone number with 24-hour answerphone, and regularly fielded queries with a prompt call back to enquirers</p>

<p>11. Posters on Parish Notice Board(s)</p>	<p>These were displayed on HKPC notice boards in the village drawing attention to the consultation, and where to find out more information</p> <p>The October "P&amp;P" article was displayed prominently in the window of the village shop for several weeks</p>
<p>12. Extend consultation period beyond statutory minimum period from six weeks to eight weeks</p>	<p>Given the disruption to life brought about by the coronavirus, the consultation period was extended from the statutory minimum of six weeks to eight weeks in order to give people more time to consider the plan and to make comments on it</p>

**\*\* The following consultees were contacted by e-mail and letter:**

<ul style="list-style-type: none"> <li>• West Sussex County Council</li> <li>• Mid Sussex District Council</li>   <li>• Fletching PC</li> <li>• Lindfield PC</li> <li>• Ardingly PC</li> <li>• Lindfield Rural PC</li> <li>• West Hoathly PC</li> <li>• Danehill PC</li> <li>• Wealden DC</li>   <li>• Natural England</li> <li>• Historic England</li> <li>• Environment Agency</li> <li>• Highways England</li> <li>• Sport England</li> <li>• Homes &amp; Communities Agency</li> <li>• High Weald AONB Unit</li>   <li>• Network Rail</li> <li>• Southern Gas Networks</li> <li>• UK Power Networks</li> <li>• National Grid</li> <li>• Gatwick Airport</li> <li>• BT /BT Open Reach</li> <li>• Southern Water</li> <li>• South East Water</li> <li>• Mobile Operators EMF: Vodafone, O2 and Three</li> </ul>	<ul style="list-style-type: none"> <li>• Sussex NHS Commissioners</li> <li>• NHS West Sussex Clinical Commissioning Group</li> <li>• Sussex Police</li>   <li>• Action in Rural Sussex</li> <li>• Sussex Wildlife Trust</li> <li>• Mid Sussex Voluntary Association</li> <li>• Horsted Keynes Community Land Trust</li> </ul>
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**6.2** During the covid pandemic, with infection levels accelerating during autumn 2020, **“socially distanced” public exhibitions or meetings** were not considered to be safe or practicable given the following factors:

- The relatively small size of available venues in Horsted Keynes, such as the Village Hall and the Martindale Centre and need for “one-way systems” with different entrance and exits
- The need to maintain social distancing within buildings (which will reduce the effective capacity of buildings much further) and avoid congregation of people outside them
- Infection risk from display boards and papers
- The need for many older, or clinically vulnerable, parishioners to maintain “shielding”, meaning they could not visit community venues
- The need for a prior booking arrangement and marshalling of any meeting (to avoid overcrowding and delayed or abortive access); and post-event cleaning of the buildings

#### **P & P ARTICLE – OCTOBER 2020 ISSUE**

##### **HORSTED KEYNES NEIGHBOURHOOD PLAN**

##### **HAVE YOUR SAY ON PLANNING THE FUTURE OF THE PARISH**

The Parish Council have prepared a revised and updated draft Neighbourhood Plan (to replace the one withdrawn in late 2018) and are inviting comments on it between October 12 and December 7 2020.

It is important that local people take this chance to view the plan documents and have their say before we firm up the Plan and submit it to Mid Sussex District Council (MSDC) to go through the more formal stages leading up to its final approval.

#### **1. What’s in the draft Neighbourhood Plan?**

The draft Neighbourhood Plan sets out detailed planning policies to guide the future development of the parish up to 2031. It covers key issues like future housing development, business and employment, community facilities, recreation, and conservation of the local environment.

Whilst the Plan has to be broadly in line with national and MSDC planning policies, it gives local people a chance to “set the rules” by producing the detailed policies by which planning applications in the parish will be decided.

After extensive consultation with the local community, the following Vision and Objectives for the future of Horsted Keynes have been developed:

##### **OUR VISION**

***‘In 2031 Horsted Keynes remains an attractive rural village, centred on the village green, and is a desirable place to live, work and visit.***

***It has a thriving local economy and is able to sustain sufficient essential services and facilities to meet most local needs. Homes are available for all stages of life and circumstances and there is a strong sense of local community which contributes to low levels of crime.***

***Development has taken place in a sustainable way, at a scale and form that preserves the distinctive rural character, landscape and community ethos.'***

This Vision will be delivered through a Plan with these Objectives:

1. Conserve and enhance the environment of the village in order to maintain its distinct rural identity, built heritage and outstanding landscape setting.
2. Maintain and enhance existing, and establish new, local services and facilities.
3. 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.
4. Support local businesses and provide enhanced employment opportunities within the parish including home working.
5. Reduce the negative impacts of traffic and roadside parking on the village and encourage safe walking and cycling.
6. Minimise the adverse environmental effects of new development and support energy reduction and sustainable energy opportunities for the whole village, in order to mitigate, and adapt to, climate change.

These Vision and Objectives, and the evidence we have gathered are the basis for the planning policies in the draft Neighbourhood Plan. We'd now like to hear your views on them.

Here is a brief summary of the main policies in the draft Neighbourhood Plan:

- On **housing**, MSDC require Horsted Keynes to provide at least 69 new dwellings up to 2031. Recent dwelling completions and outstanding planning permissions – together with the two development allocations proposed by MSDC on land south of Police House Field in Birchgrove Road (25 dwellings) and land south of St. Stephen's Church in Hamsland (30 dwellings) –will be sufficient to meet this requirement. The size and mix of housing in larger developments should reflect local needs
- The draft Neighbourhood Plan does not itself propose any further allocations of land for new housing, but has planning policies to support **community-led housing** to meet local needs, particularly rented homes for smaller households
- Planning policies seek to maintain the character and identity of Horsted Keynes through good quality **design**, which respects the village setting and the surrounding countryside, for all new development, infill and extensions. Detailed guidance covers scale, height and form of buildings; plot widths and spacing; materials; innovative and sustainable design; and respecting the privacy and outlook of neighbouring properties.
- **Conserving local heritage**, particularly the conservation areas in Horsted Keynes and Birch Grove, listed buildings and other heritage assets
- **Safeguarding Local Green Spaces** at the Village Green, the Recreation Ground and the Cricket Field
- **Conserving and enhancing the** nationally important landscape of the **High Weald Area of Outstanding Beauty (AONB)**, particularly those features which define its special character such as ancient woodlands, historic route ways and field patterns, some of which are medieval in origin
- **Promoting low carbon development and renewable energy and use of sustainable drainage systems**, which help reduce flood risk
- **Controlling light pollution as far as possible**, whilst recognising the need for public safety and security
- **Supporting the expansion of existing businesses**, as long as this is sensitive to the local environment, and supporting **investment in faster broadband and mobile telecom services** for the village
- On **transport**, safeguarding existing off-street car parks, adequate parking provision in new development, and promoting better footway and cycleway links, so that people can get around the village more easily without needing a car





## **2. How do I see the draft Neighbourhood Plan documents and find out more?**

The following documents will be available to see online from around October 5:

- The draft Neighbourhood Plan
- Draft Sustainability Appraisal (a legal requirement to demonstrate that the plan will deliver sustainable development)
- Site Assessment of “realistic development options” for new housing
- An updated evidence base setting out changes in the background to the plan since 2016-17
- Habitat Regulations Assessment (prepared by MSDC and a legal requirement because of the parish’s proximity to protected areas in Ashdown Forest)

We have followed the Government guidance on public consultation on Neighbourhood Plans during the COVID-19 pandemic. This means that public consultation on the Plan will mostly be online, with all the relevant documents for you to see on the HKPC web site [www.horstedkeynesparishcouncil.com](http://www.horstedkeynesparishcouncil.com).by navigating Neighbourhood Plan → Public Consultation

For those who don’t have access to a computer or smartphone, you can contact the Parish Council via 01825 791395 (answerphone available) to make alternative arrangements for viewing and comment.

With the need to avoid any public consultation arrangements which risk spreading COVID-19, we will unfortunately not be able to arrange any local exhibitions or public meetings on the Neighbourhood Plan in the village. However, we have taken extra steps to publicise the draft Plan locally and have also extended the consultation period from the normal six weeks to eight weeks

## **3. How do I make comments on the draft Plan?**

We prefer comments by e-mail, if possible. All email responses should be forwarded to [hkparishcouncilnp@gmail.com](mailto:hkparishcouncilnp@gmail.com) and include the ‘name of the sender’, ‘name of organisation’ (if applicable) and ‘on behalf of’ (if applicable).

You can also send comments by post, or drop off comments, to the Parish Council, Parish Council Office, Rear of Village Hall, The Green, Horsted Keynes, West Sussex RH17 7AP

**The closing date for comments is Monday 7 December at 23:59**

## **4. What happens next?**

It is hoped that all views received will be posted online by mid-December.

All views will be carefully considered and changes can still be made before the Plan is formally submitted to Mid Sussex District Council (MSDC).

We also have to prepare documents to show how we have consulted with local people and taken their views into account (The Public Consultation Statement) and to show how our plan relates to national and local planning policies (The Basic Conditions Statement). The Plan will then go on for more formal stages involving further consultation, independent examination, and a local referendum, before it is finally approved.

The Parish Council’s Subscription service alerts all its subscribers when a change in information occurs –to register e-mail the parish clerk at [hkparishcouncilnp@gmail.com](mailto:hkparishcouncilnp@gmail.com)

The Government’s recent white paper on reforming the planning system generally supports continued work on neighbourhood plans and is encouraging them as a way of helping to deliver better quality development.

- 6.3** The public consultation resulted in 99 different submissions from local residents, businesses and landowners, and from a range of consultees, making a total of over 260 separate points.
- 6.4** The various responses were assessed by the Parish Council's planning consultant, with recommendations for any amendments. As part of this work, there has been liaison with MSDC officers and other key consultees, and with individual responders where clarification or further discussion was required. Within the constraints of the covid regulations, the consultant also carried out site visits as necessary.
- 6.5** The main issues arising from the consultation were as follows:
- Objections to MSDC's proposed allocation of land for housing development at the rear of St Stephen's Church, Hamsland (SA29) in its Site Allocations DPD and the NDP's acceptance of its role in future housing supply in the NDP.
  - To a lesser extent, objections to MSDC's proposed allocation of land for housing development at the Old Police House Field (SA28) in its Site Allocations DPD and the NDP's support for its role in future housing supply.
  - Suggestions that sites at Jeffrey's Farm (particularly Site 68: the farm buildings) would be a preferable location for housing allocation.
  - The status of the Constance Wood Field and whether it should be designated as a "local green space" (policy HK7).
  - The NDP policy for the mix of housing in larger new developments (policy HK3)
  - Whether the policy for protection of the AONB (policy HK9) is sufficiently distinct from District Plan policy DP6.
  - Concerns over the accuracy of information used in the Site Assessment and the Sustainability Assessment and, by extension, the conclusions drawn from them.
- 6.6** All these points, and the response to them, were covered in a suite of documents which were prepared for consideration at an EGM of the Parish Council on 30th March 2021.
- <https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/03/21-03-30-HKNP-covering-report.pdf>
- <https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/03/21-03-30-HKPC-Doc-A-Reg-14-consultation-methods-2.pdf>
- <https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/03/21-03-30-HKNDP-Doc-B-Summary-of-Representations-with-pics-1.pdf>
- <https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/03/21-03-30-HKNDP-Doc-C-Analysis-and-Recs-Final.pdf>
- 6.7** However, there was an overwhelming negative response to the planned allocation of St. Stephen's Field (SA29) in the MSDC DPD and a clear rejection of support for this allocation in the NDP. Consequently, the process was halted, the documents were not reviewed at that EGM and a second EGM was held on 13<sup>th</sup> April 2021 to consider the way forward. The outcome of this was the formation of a new Neighbourhood Plan Steering Group (NPSG) to work through the options for progressing the NDP.

## 7. NDP MARCH 2021-2022: CONSULTATION ACTIVITY

- 7.1** The Neighbourhood Plan Steering Group (NPSG) which was formed was comprised of three members of the Parish Council and three members of the community.

With a strong emphasis on transparency, especially under the covid-19 restrictions, notes were produced and published for working meetings and phone calls, and all full meetings, open to the public were minuted. In full meetings attendees were asked to contribute to every agenda item and their comments and contributions were encouraged and welcomed.

- 7.2** From the 19<sup>th</sup> April to 3<sup>rd</sup> June 2021 the NPSG held a total of 5 meetings which were focused on reviewing the Site Appraisals of those sites contained within the NDP (Appendix B). This included contacting all of the landowners/developers to ask them for an update on any changes since the previous appraisal.

- 7.3** On 6 June 2021, after seeking advice from O'Neill Homer (planning consultants) about possible ways to proceed, it became clear that any Site Allocations in the NDP would be in addition to those in a made MSDC DPD and that Paragraph 30 of the NPPF does not support the idea that NDP allocations would supersede those sites already allocated by a District Council.

Having taken the advice of O'Neill Homer, it was decided to await the outcome of the Examination of the MSDC DPD.

- 7.4** From 4<sup>th</sup> October 2021 to 22<sup>nd</sup> February 2022 the NPSG met to discuss the impact on the NDP of the possible outcomes of the MSDC DPD Examination. During this time, the NPSG consulted MSDC Planning Department, MSDC Housing and Enabling Team, Locality and the community, through full NPSG meetings. As the Examiner published his Main Modifications which did not exclude SA28 and SA29, and confirmation was received that there would no longer be a requirement to identify additional allocations once the DPD is made, it was decided that the best way to proceed would be to produce a plan without any reference to site allocations.

- 7.5** On 22<sup>nd</sup> February 2022 the following Regulation 14 comments and responses thereto, were considered and agreed by an EGM of the Horsted Keynes Parish Council.

<https://horstedkeynesparishcouncil.com/wp-content/uploads/2022/02/EGM-Covering-report-Feb-2022-1.docx>

<https://horstedkeynesparishcouncil.com/wp-content/uploads/2022/02/Doc-A2-Reg-14-consultation-methods-220222-1.docx>

<https://horstedkeynesparishcouncil.com/wp-content/uploads/2022/02/Doc-B2-Summary-of-Representations-220222-1.docx>

<https://horstedkeynesparishcouncil.com/wp-content/uploads/2022/02/HK-NDP-HK1.docx>

**7.6** On 8<sup>th</sup> March 2022 the Parish Council approved the appointment of ONeill Homer as consultants who has supported the NPSG through reviewing the amendments made in all the documents listed below. These documents have been updated to incorporate Regulation 14 feedback, as set out in the documents listed in paragraph 7.5 above, and the update to the NPPF in July 2021.

- **Draft NDP**
- **Sustainability Appraisal (incorporating SEA)**
- **Updated Evidence Base**
- **Basic Conditions Statement**
- **Consultation Statement**
- **Habitat Regulations Appraisal (by MSDC)**

**7.7** Over the last two years the NPSG has faced a challenge to analyse and decide how to modify the plan to respond to comments. Once the principle of the plan making site allocations had been overtaken by events and therefore no longer required to be made in the NDP, the remaining comments have not challenged the fundamental principles of the plan, as set out in the documents listed in paragraph 7.5 above, but the consideration of these comments and removal of site allocations from the NDP and its supporting documents has required time to consider how to make the changes.

**7.8** An EGM of Horsted Keynes Parish Council was held on 19th July 2022. This EGM was advertised on posters around Horsted Keynes Village and in the Parish & Parishioner Magazine, which is distributed throughout the Parish, in the form of the article shown on the following two pages.

**7.9** An NDP Open Morning was held in the Village Hall on Saturday 9th July.

**7.10** On 19th July 2022 the Parish Council approved all documents for Regulation 15 submission to MSDC.

## Horsted Keynes Neighbourhood Development Plan

### What happened last year?

In March 2021, the Parish Council halted progress on the Neighbourhood Plan because of the overwhelmingly negative response to “supporting” the allocation of St Stephen’s Church Field by Mid Sussex District Council.

**The Parish Council withdrew its support for the district housing allocations in Horsted Keynes.**

A new Neighbourhood Plan Steering Group set about reviewing the assessments of all the sites in Horsted Keynes to see if there were any suitable alternative options.

Meanwhile the district housing allocations progressed, (which included the two sites in Horsted Keynes, on Police House Field and St Stephen’s Church Field).

An Independent Inspector held a Public Examination to assess the soundness of these

### What is new?

There are two new and important pieces of information:

1. The Inspector did not remove any sites from the district housing allocations and, as a result, St Stephen’s Church Field and the Police House Field will be allocated for development. Our Neighbourhood Plan cannot override this.
2. These district housing allocations will meet the housing requirements for Horsted Keynes in full (up to 2031).

### Where are we now?

The Parish Council agreed the Neighbourhood Plan Steering Group would seek advice from a consultant on the best way to proceed.

As a result of the new information above there is no requirement for us to allocate any additional housing at this stage and there is no longer any option for us to consider alternative sites.

**Therefore we have prepared a Plan without Site Allocations.**

**All the documents will be available on the Parish Council website.**

As part of the necessary ongoing review of our Neighbourhood Plan the Parish Council may still need to consider site allocations in the future if the need arises.

**EGM Tuesday 19<sup>th</sup> July 2022 7:30pm Village Hall**

### Why do we still need a Neighbourhood Plan?

Every other parish and town in Mid Sussex has a Neighbourhood Plan and, without one, Horsted Keynes is vulnerable to speculative development.

Our Neighbourhood Plan will include a lot of policies that are specific to our parish and have been drafted to help protect our village and support its environment, infrastructure and community. It will also help to ensure that where development is permitted in the future, it will be well designed to reflect the views of the community.

Without a Neighbourhood Plan we effectively have no say on the policies that developers are required to comply with when building in Horsted Keynes.

**This is our last chance to influence the future of our village in a plan-led way, rather than being forced to react to speculative planning applications.**

### What happens next?

The updated Neighbourhood Plan will be considered by the Parish Council at an **Extraordinary General Meeting in the Village Hall at 7:30pm on Tuesday 19<sup>th</sup> July 2022.**

If agreed, it will then be submitted to Mid Sussex District Council who will carry out a further public consultation before the community will get to vote in a referendum.

If more than 50% of parishioners support the plan at referendum it can finally be "made".

If you have any questions or comments please contact the Neighbourhood Plan Steering Group;

**Email:** [hkparishcouncilnp@gmail.com](mailto:hkparishcouncilnp@gmail.com)

**Address:** Rear of the Village Hall  
The Green  
Horsted Keynes  
RH17 7AP

Or come along to the  
drop in session



**Any questions? Drop-in session**  
**Saturday 9<sup>th</sup> July 9:30 – 12:30 Village Hall**