

Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation

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Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: General

ID: 1
Respondent: Sport England

From: Planning South <Planning.South@sportengland.org>
Sent: 27 September 2022 14:48
To: neighbourhoodplans
Subject: RE: Horsted Keynes Neighbourhood Plan – Regulation 16 Consultation

Categories: Horsted Keynes

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team
Planning.south@sportengland.org



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: General

ID: 2
Respondent: Gatwick Airport Limited

YOUR LONDON AIRPORT

Gatwick

30 SEPTEMBER 2022

Planning Policy Section
Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Re: Horsted Keynes Neighbourhood Development Plan Consultation
Our Ref: LGW4912

Thank you for your email dated 26 September 2022, regarding the above-mentioned consultation.

Horsted Keynes is around 16km from the ARP (Aerodrome Reference Point) at Gatwick Airport and is therefore outside of our 'physical' 15km safeguarding area. Currently from 15km to 30km we only need to know about proposed wind turbines.

Wind turbines 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.

We will be issuing a new safeguarding consultation map possibly in Spring 2023; we will keep you updated.

If you have any queries, please do not hesitate to contact me. Thank you for giving us the opportunity to comment on this document.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding
For and on behalf of Gatwick Airport Limited

Email: gal.safeguarding@gatwickairport.com

Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: n/a

ID: 3
Respondent: High Weald AONB


[REDACTED]

From: High Weald Director <[REDACTED]>
Sent: 30 September 2022 10:54
To: neighbourhoodplans
Cc: Jennifer Hollingum; Sally Marsh
Subject: Re: Horsted Keynes Neighbourhood Plan – Regulation 16 Consultation

Categories: Horsted Keynes

Dear Colleague,

Thank you for your e-mail inviting representations on the Horsted Keynes Neighbourhood Plan. Unfortunately we do not have an AONB Planning Advisor at the moment, which means we are unable to provide an individual response to this consultation.

 **WINNER** CPRE Sussex Countryside Awards 2020
Yours sincerely,
Jason Lavender
Co-Director
High Weald AONB Partnership
Tel: 01424 723008

Please note I work part time (Wednesday, Thursday, and Friday)

Advising on an outstanding medieval landscape; connecting people, protecting beauty, restoring soils and nature.
Woodland Enterprise Centre, Hastings Road, Flimwell, East Sussex, TN5 7PR
www.highweald.org | [Twitter](https://twitter.com) | [Facebook](https://facebook.com)

Please [subscribe to our monthly eNews](#) to make sure you don't miss out on all the latest news, guidance, funding opportunities and events from across the High Weald AONB. You can easily unsubscribe at any time and your details will not be shared with any other organisation.

Winner of two CPRE Sussex Countryside Awards for the [High Weald Hero education programme and High Weald Housing Design Guide](#)

Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: HK9
HK10

ID: 4
Respondent: Environment Agency

[REDACTED]

From: Rabone, Anna <[REDACTED]>
Sent: 28 October 2022 15:34
To: neighbourhoodplans
Subject: Horsted Keynes Neighbourhood Plan – Regulation 16 Consultation

Dear Sir or Madam,

Thank you for consulting us on the Hosted Keynes Neighbourhood Plan.

Based on the environmental constraints within the area, we have no detailed comments to make in relation to the Plan. However 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:

<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

We would like to comment that Policy HK9, bullet point 1 (restoration of the natural functions of watercourses and water bodies) in particular is very commendable. Natural Flood Management can form part of such plans, and we can direct you to useful information on the gov.uk website here -

<https://www.gov.uk/guidance/use-nature-based-solutions-to-reduce-flooding-in-your-area>.

Policy HK10 includes reference to Biodiversity Net Gain. You may wish to specify that at least 10% net gain is required which will align with the requirements in the Environment Act 2021 (Schedule 14 which inserts a new Schedule 7A into the Town and Country Planning Act 1990 - set to come into force in November 2023).

We will continue to work with partners to influence the Development Plan Documents in your area.

Kind regards,
Anna

Anna Rabone

Sustainable Places Technical Specialist | Solent and South Downs
Environment Agency | Oving Road, Chichester, West Sussex, PO20 2AG

Direct dial: 02077 140525

My pronouns are She/Her ([why is this here?](#))

**Creating a better place
for people and wildlife**

Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: General

ID: 5
Respondent: Southern Water

From: Policy, Planning <Planning.Policy@southernwater.co.uk>
Sent: 31 October 2022 09:54
To: neighbourhoodplans
Subject: FW: Horsted Keynes Neighbourhood Plan – Regulation 16 Consultation

Dear Sir/Madam,

Thank you for your email below, inviting Southern Water to comment on the submission version of the Horsted Keynes Neighbourhood Plan.

I confirm we have reviewed the plan, and are pleased to note our previous comments have been addressed. We therefore have no further comments to make.

We look forward to being kept informed of future progress of the plan.

Yours faithfully,

Charlotte Mayall
Strategic Planning Lead
Hampshire, West Sussex & Isle of Wight

M. 07908 255007
southernwater.co.uk



Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: General

ID: 6
Respondent: Historic England



Historic England

By email only to: neighbourhoodplans@midsussex.gov.uk

Our ref: PL00718342

Your ref: Horsted Keynes Neighbourhood Plan Reg 16

Main: 020 7973 3700

e-seast@historicengland.org.uk

Date: 08/11/2022

Ref: Horsted Keynes Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to previous comments submitted at Regulation 14 stage , and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Louise

Louise Dandy

Historic Places Advisor London and South East



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: n/a

ID: 7

Respondent: Natural England

Date: 03 November 2022
Our ref: 408266
Your ref: Horsted Keynes Neighbourhood Plan



Policy Planning
Mid Sussex District Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

neighbourhoodplans@midsussex.gov.uk

T 0300 060 3900

Dear Sir/Madam

Horsted Keynes Neighbourhood Plan – Regulation 16

Thank you for your consultation on the above dated 26 September 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on the Horsted Keynes Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Sally Wintle
Consultations Team

Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: n/a

ID: 8

Respondent: National Highways

[REDACTED]

From: Cleaver, Elizabeth <[REDACTED]>
Sent: 07 November 2022 16:47
To: neighbourhoodplans
Cc: Planning SE
Subject: National Highways response: Horsted Keynes Neighbourhood Development Plan – Regulation 16 consultation

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Consultation: Horsted Keynes Neighbourhood Development Plan – Regulation 16

National Highways' Ref: Tracker #17949; (JSJV SB537)

Dear Sir/Madam,

Thank you for your notification of 26 September 2022 regarding the Horsted Keynes Neighbourhood Development Plan Regulation 16 consultation inviting comments by 7 November 2022.

National Highways 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 we work 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 policies and proposals that have the potential to impact on the safe and efficient operation of the SRN; in this case, particularly the A23.

We note that the Horsted Keynes Neighbourhood Plan does not contain any residential or employment allocations, with policies HK1, HK5, HK14 outlining that provision of new housing and employment development of appropriate size and characteristics are supported, provided that the proposals are not in conflict with other HKNP and Development Plan policies including transport.

We do not have any comments on the Neighbourhood Plan. However, thank you for consulting us. If you wish to discuss this response please contact us at PlanningSE@nationalhighways.co.uk.

Kind regards,

Elizabeth Cleaver, Assistant Spatial Planning Manager

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <http://nationalhighways.co.uk/>

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: General

ID: 9

Respondent: West Sussex County Council

From: [REDACTED] on behalf of Planning Policy
<Planning.Policy@westsussex.gov.uk>
Sent: 10 November 2022 10:19
To: planningpolicy
Cc: Eleanor Harman
Subject: RE: Horsted Keynes Neighbourhood Plan – Regulation 16 Consultation

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Good morning,

Please accept our apologies for the late response to the Horsted Keynes Reg 16 consultation. Our only comments would be to note that para 8.7 refers to WSCC Parking Guidance from 2019. The most recent Parking Guidance was published in September 2020 and is available [here](#).

Kind regards,

The Planning Policy and Infrastructure Team

Planning Policy and Infrastructure
Planning Services
West Sussex County Council
Location: Ground Floor, Northleigh, Chichester, West Sussex, PO19 1RH
E-mail: planning.policy@westsussex.gov.uk

Horsted Keynes Neighbourhood Plan: Regulation 16 Consultation Response

Topic: Support text
HK5
HK9
HK11

ID: 10
Respondent: Mid Sussex District Council

Contact:

Neighbourhood Planning: 01444 477068
email: neighbourhoodplans@midsussex.gov.uk

Your Ref:

Our Ref: HKNDP

Date: 4th November 2022

Dear Examiner,

Response to Horsted Keynes Neighbourhood Plan Regulation 16 (Submission) Consultation

Please find attached to this letter, Mid Sussex District Council's response to the Horsted Keynes Neighbourhood Plan Regulation 16 (Submission) Consultation.

The progression of the Horsted Keynes Neighbourhood Plan to the Submission stage is an important milestone, the result of a considerable amount of hard work by the Steering Group on behalf of the Parish Council. Many of the policies in the Neighbourhood Plan support the Mid Sussex District Plan policies and add local distinctiveness.

The District Council has sought to work proactively with the Steering Group to ensure that the Neighbourhood Plan is successful at Examination and has provided informal and formal comments on the Neighbourhood Plan as it has progressed through the various stages. Many of our comments are now reflected in the Submission version of the Neighbourhood Plan. However, the District Council (as decision maker) will need assurance that policies are clearly written and unambiguous to ensure they can be successfully implemented as the Parish Council intends and therefore has some comments and recommendations for your consideration.

The District Council's comments are set out in detail in the attached table. I trust that the Examiner will consider the issues we raise in our response during the examination of the Horsted Keynes Neighbourhood Plan.

Yours sincerely,

Councillor Robert Salisbury
Cabinet Member for Housing and Planning

MSDC's Comments on the Horsted Keynes Regulation 16 (Submission) Neighbourhood Plan

Ref	Comments	Recommendation to Examiner
Para 1.1	<p>This document is the draft Neighbourhood Plan for Horsted Keynes parish. If “made”, it will form one part of the statutory development plan for the parish over the period 2016 to 2031, the other parts being including the Mid Sussex District Plan 2014-2031, adopted in March 2018 and the recently adopted Mid Sussex Site Allocations Development Plan Document (DPD).</p> <p>The development plan for the neighbourhood area contains a portfolio of documents.</p>	Amend wording
Para 1.16	<p>This paragraph is out of date.</p> <p>Suggested wording: ‘Mid Sussex District Council is in the process of reviewing and updating the adopted District Plan. The Mid Sussex District Plan 2021-2039 aims at achieving the adopted vision and strategic objectives while implementing a revised strategy to guide growth during the plan period. It provides updated and new policies to ensure that the Plan remains effective and in accordance with National Policy. It also includes new housing allocations to meet identified housing needs.’</p>	Amend wording
HK5	<p>The second bullet point refers to ‘important views out of the village’ which have not been defined within the Plan or accompanying evidence base.</p> <p>The Council fully support the initiative to preserve the visual integrity, identity and scenic quality of valued countryside across the neighbourhood area, and more generally across the district. However, the proposed policy does not provide any details as to the specific characteristics that need particular attention and protection when considering planning applications.</p>	Define ‘important views out of the village’ or delete the policy requirement.
HK9	<p>The Council is unsure that this policy is needed as it refers to existing documents and lists criteria that all development must demonstrate which we believe lacks local specificity and may be too onerous and unreasonable with challenging concepts to apply to 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 there may be no need for a neighbourhood plan, or a simpler more selective neighbourhood plan could be produced, otherwise the neighbourhood plan risks</i></p>	Delete the policy

Ref	Comments	Recommendation to Examiner
	<p><i>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>HK11</p>	<p>The Council is in the process of reviewing its District Plan. It will include an updated sustainable buildings policy with introducing new climate change policies to assist processing towards the government's net zero target of 2050.</p> <p>It is encouraging to see a clear support for renewable and low carbon facilities, however the proposed policies would need further definition (e.g. 'zero carbon ready', 'all development', 'landform', 'greening of the building') and the inclusion of a mechanism to demonstrate how the policy is met. In the current state, the policy will be challenging to implement and is likely to be superseded upon adoption of the Mid Sussex District Plan 2021-2039.</p>	<p>Provide further information to strengthen the policy.</p>