## Mid Sussex District Plan – 25<sup>th</sup> / 26<sup>th</sup> July 2017 Examination Hearing Sessions: Housing

1) The following statement has been prepared by Nexus Planning Ltd on behalf of Gleeson Developments Limited ("GDL").

## 3. Whether the proposed modification to Policy DP5: Housing is sound in respect of the numbers of dwellings attached to settlements

- 1) Following the Inspector's request in ID20 to establish the number of dwellings expected in each settlement or groups of settlement, the Council has published within MSDC 8c a revised approach to Policy DP5 (will be reworded as DP6), which establishes a minimum housing requirement for each settlement. Appendix 1 'Parish OAN Distribution Summary Methodology' explains the methodology for allocating growth and provides a residual housing requirement for each settlement having accounted for completions, commitments, District Plan allocations and windfalls. In total, GDL note that the residual requirement is 2,491 dwellings over the Plan period.
- 2) GDL note that submissions by the Developer Forum identify that the District Plan housing requirement is demonstrably too low. On this basis, it is clear that the overall distribution of housing to settlements/groups will need to be reappraised and revised upwards.
- 3) Whilst GDL wholly support the District Plan providing directions on the level of housing growth at a more localised level, it is considered that establishing requirements at a settlement level is unnecessarily restrictive. This approach is supported by the fact that the Council acknowledge within paragraphs 15 and 16 of Appendix 1 to MSDC 8c that during the life of the Plan, growth levels at individual settlements will need to change in response to a number of factors (for example under/over provision). To address with this, the Council proposes an aggregated requirement by settlement category post the initial five year period of the Plan.
- 4) However, GDL considers that an aggregate housing requirement by settlement category should be provided from the outset of the Plan, as this would ensure a sustainable pattern of growth that accords with the Settlement Hierarchy, but importantly also enables the Council to more easily respond to situations where a particular settlement is demonstrably falling short of its identified housing requirement i.e. by allowing another settlement within the same category to make up this shortfall.
- 5) In addition, GDL note that a number of identified settlements are wholly within the High Weald Area of Outstanding Natural Beauty ("AONB") (such as Ardingly, Balcombe and Horsted Keynes) and are provided with a housing requirement, which cumulatively have a residual requirement in excess of 100 dwellings. Having regard to the AONB tests set out within paragraphs 115 and 116 of the NPPF and fact that a number of these settlement are actually classed a Category 3, GDL consider that growth should be reduced in these locations and reallocated to more sustainable and less constrained locations, such as settlement Categories 1 and 2.