1. At the District Plan examination hearings held on 25th and 26th July 2017, a discussion was held regarding the contribution Mid Sussex could make towards the unmet need within the Housing Market Area (HMA), particularly to address need arising from Crawley. This was in light of new evidence related to the calculation of the residual unmet need (principally raised by the Developer’s Forum and Mr Kerslake) and the timescale over which it had been previously calculated.

2. The following numerical position is agreed by the three HMA authorities (Crawley, Horsham and Mid Sussex).

**Objectively Assessed Need**

<table>
<thead>
<tr>
<th>Plan Period</th>
<th>Plan Years</th>
<th>Annual OAN</th>
<th>Total OAN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crawley</td>
<td>2015-2030</td>
<td>15</td>
<td>675</td>
</tr>
<tr>
<td>Horsham</td>
<td>2011-2031</td>
<td>20</td>
<td>650</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>2014-2031</td>
<td>17</td>
<td>876</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. Based on supply identified in currently adopted Local Plans, and the position concluded at the end of the last hearing for Mid Sussex:

**Plan Supply**

<table>
<thead>
<tr>
<th>Plan Period</th>
<th>Plan Years</th>
<th>Annual Supply</th>
<th>Total Supply</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crawley</td>
<td>2015-2030</td>
<td>15</td>
<td>340</td>
</tr>
<tr>
<td>Horsham</td>
<td>2011-2031</td>
<td>20</td>
<td>800</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>2014-2031</td>
<td>17</td>
<td>876/1,090</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>37,490</strong></td>
</tr>
</tbody>
</table>

4. At the hearing sessions, Mid Sussex presented a range of scenarios titled 1a – 4b (library ref: MSDC19). These showed various results dependant on three interchangeable variables:
   - Using Crawley's plan supply position or position outlined in their current plan supply monitoring
   - Addressing the need by 2030 (Crawley’s plan period) or 2031 (Horsham/Mid Sussex plan period)
   - An allowance of 35dpa ‘elsewhere’, a point discussed at the hearings

5. Mid Sussex District Council put forward that scenario 2b – a stepped trajectory of 876dpa until 2023/24 then 1,090dpa thereafter was its preferred approach. This, it was felt, would address the unmet need by 2031 and allow for 35dpa elsewhere (potentially within Crawley itself should increased levels of delivery materialise).

6. At the hearing session both Crawley Borough Council and Horsham District Council stated that they had not had the opportunity to consider all of the scenarios and could not, therefore, offer their support to scenario 2b at that time. Both raised initial concerns regarding the plan period length and the 35dpa ‘elsewhere’ variables and were invited to consider these implications further after the hearings.

7. Following the hearing sessions, the three authorities have met to discuss the issues raised in order to understand all the implications of the scenarios, and ensure the policy within the District Plan is supported by the HMA authorities. These discussions have led to some
changes to supporting text and policy wording (they do not change the total housing provision or the stepped trajectory).

8. The following amendments to policy wording and supporting text for policies **DP5: Housing** and **DP5a: Planning to Meet Future Housing Need** have been drafted in order to address the concerns raised by Crawley and Horsham at the hearings and during further discussions. The changes proposed (highlighted in yellow) have been agreed at officer level (see Appendices A and B).

**DP5: Housing**

Supporting Text:

[...]

In preparing the DPD, the Council will liaise with town and parish councils and undertake further consultation. The Council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex (NWS) Housing Market Area (HMA), in exploring opportunities and resolving infrastructure and environmental constraints in order to meet housing need in sustainable locations. The Council will also explore the potential to realise brownfield land housing capacity through the preparation of a Brownfield Sites register. The Council also intends to undertake a review of the Plan after the adoption of the Site Allocations DPD which will reconsider need and allocate further dwellings if required. This will be submitted to the Secretary of State in 2023.

[...]

**DP5a: Planning to Meet Future Housing Need**

The Council commits to working with the neighbouring authorities in the HMA to resolve unmet needs over the full plan period.

The provision of housing identified within Policy DP5: Housing seeks to meet the Objectively Assessed Need identified for the Northern West Sussex Housing Market Area in the current generation of sound and consequently adopted Local Plans. These are:

- Crawley Local Plan (2015-2030)
- Horsham District Planning Framework (2011-2031)

It is recognised, however, that Crawley’s Local Plan finishes a year before the Mid Sussex and Horsham plans. There will therefore be housing need generated in Crawley for 2031 which is within the District Plan period, but is not being planned for at present as it has yet to be established or tested. The review of the District Plan (commencing in 2021) will seek to address this need, and any further unmet need arising within the Housing Market Area.

The District Plan housing requirement established by Policy DP5 may result in a residual unmet need of 35dpa arising within the Northern West Sussex (NWS) HMA, based on the combined provision planned within the NWS authorities’ adopted Local Plans against the combined objectively assessed housing needs. The amount of this outstanding unmet need will be monitored throughout the plan period and, if necessary, accounted for in future reviews of the District Plan to ensure the HMA can meet its housing need as far as is consistent with the policies set out in the National Planning Policy Framework.

The Council recognises that there is also a shortfall of housing in the neighbouring coastal West Sussex area, caused in particular by the inability of Brighton & Hove, and some of the other coastal
authorities, to meet their own needs. The level of unmet need is high and the Council is taking steps, with its neighbouring authorities and those in the sub-region, to address the issue. The scale of the issue requires a sub-regional response.

The Council is a participant in the Coastal West Sussex and Greater Brighton Strategic Planning Board which is addressing the issue of unmet housing needs in the coastal area through the Local Strategic Statement 3 (LSS3). The Council will participate in that process.

The LSS3 work is progressing and the Council has committed to support this work including financial support to commission the necessary associated evidence base material. The exact timing of the LSS process is difficult to predict but the Council is committed to a proactive role within it.

**DP5a: Planning to Meet Future Housing Need**

**Strategic Objectives:** All.

**Evidence Base:** Burgess Hill: Strategic Housing Land Availability Assessment; Mid Sussex District Council Windfall Study; Housing and Economic Development Needs Assessment; Capacity of Mid Sussex District to Accommodate Development; Sustainability Assessment of Cross-boundary Options.

The Council will continue to work under the ‘Duty-to-Cooperate’ with all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Areas, prioritising the Northern West Sussex HMA as this is established as the primary HMA.

The Council will work jointly and proactively with the Gatwick Diamond and the West Sussex and Greater Brighton Strategic Planning Board to address unmet housing need in the sub region.

The Council’s approach will ensure that sites are considered and planned for in a timely manner and will be tested through a robust plan-making process, as part of a review of the Plan starting in 2021, with submission to the Secretary of State in 2023.
Appendix 1: Crawley Borough Council

Strategic Housing & Planning Services

Contact: Diana Maughan  Date: 27 September 2017
Direct Line: 01293 438234  Email: diana.maughan@crawley.gov.uk

Andrew Marsh
Mid Sussex District Council
Oaklands, Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

By Email Only

cc. Sally Blomfield, Mid Sussex District Council
Chris Tunnell, Mid Sussex District Council
Lois Partridge, Mid Sussex District Council
Barbara Childs, Horsham District Council

Dear Mr. Marsh,

MID SUSSEX DISTRICT PLAN: NORTHERN WEST SUSSEX HOUSING MARKET AREA HOUSING NEED – JOINT POSITION STATEMENT

Thank you for offering Crawley Borough Council (CBC) the opportunity to consider Mid Sussex District Council’s (MSDC) proposed modifications to the Mid Sussex District Plan (MSDP) following the Examination Hearing sessions held on 25 and 26 July 2017.

I can confirm that CBC support the proposed modifications as set out in your draft document, Northern West Sussex Housing Market Area: Agreed Changes to DP5: Housing (circulated in your email dated 19 September 2017). It is considered that these changes address some of the outstanding concerns held by CBC in relation to the unmet need arising within the Housing Market Area over the full Plan periods, including those in relation to the unmet need arising in 2030/31 and the potential 35 dwellings per annum “elsewhere” figure.

I can also confirm that CBC agree the factual and numerical position as set out in the document referred to above.

We welcome the commitment in the District Plan to joint working within this Plan period to address the housing requirement in full and to understand strategic site opportunities across the whole Housing Market Area (HMA). We also welcome MSDC’s commitment to working with the HMA and the Gatwick Diamond in planning to meet future housing needs.

We maintain our position that, as this matter relates to, and has implications for the whole HMA, the Position Statement is to be agreed by all three Northern West Sussex Authorities.

We welcome the continued joint working and look forward to seeing these proposed modifications in your draft District Plan when it is out for public consultation in due course.

Yours Sincerely,

[Signature]

Diana Maughan
Head of Strategic Housing and Planning Services
Appendix 2: Horsham District Council

Andrew Marsh
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Dear Mr Marsh,

**Mid Sussex District Plan: Northern West Sussex Housing Market Area Housing Need – Joint Position Statement**

Following the Examination hearing sessions that were held on 25 and 26 July 2017, we would like to thank you for the opportunity that you have provided to Horsham District Council to consider the proposed modifications to the Mid Sussex District Plan set out in your draft document ‘Northern West Sussex Housing Market Area: Agreed Changes to DP5 Housing’ and circulated to us in your email of 19 September 2017.

I can confirm that Horsham District Council agree the factual and numerical position set out in the draft document referred to above. In addition, we consider that the proposed changes help to address some of the outstanding concerns raised by Horsham District Council in relation to the unmet need arising in the Housing Market Area over the plan periods for the three authorities. We are therefore supportive of the proposed modifications set out in this document.

We particularly welcome the commitment in the document to continued joint working with the Northern West Sussex Housing Market Area and that the Council will work to address any unmet need arising in the Housing Market Area as part of the review of the District Plan when this commences in 2021.

We look forward to seeing these proposed modifications in your draft District Plan when it is published for public consultation in due course. In the meantime, should you have any further questions or queries please do not hesitate to contact me.

Yours sincerely,

Barbara Childs
Head of Planning Policy and Sustainability

cc: Sally Blomfield, Chris Tunnell, Lois Partridge – Mid Sussex District Council
    Diana Maughan – Crawley Borough Council