

MID SUSSEX DISTRICT PLAN EXAMINATION

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Dear Mr Tunnell

Mid Sussex District Plan 2014-2031

Thank you for your letter of 9 March 2017.

I appreciate the Council's desire to move towards the adoption of a sound plan for Mid Sussex as soon as possible, which is in everyone's interest.

My understanding of your letter is that the Council, despite its reservations, would be prepared to incorporate an OAN of 876 dpa into the plan which would be used as the basis for the 5 year supply. Meanwhile work would be carried out by a group of authorities, which now includes Crawley, under the LSS3 label, to address unmet housing needs in the wider area. LSS3 is short for Local Strategic Statement 3, set up by the Coastal West Sussex and Greater Brighton Strategic Planning Board to identify and manage spatial planning issues that have an impact on more than one local planning area and support better integration and alignment of strategic spatial and investment priorities.

This raises a number of issues. The evidence given to the Examination demonstrated very clearly that the LSS3 work is at a very early stage, that of identifying study boundaries; so far there appears to have been little substantive progress (certainly nothing substantial to consider in the Examination) nor even any indication of a timetable. I was only prepared to accept the LSS3 work as an appropriate route in respect of the coastal authorities' unmet needs because of the complexity and scale of that issue, the number of authorities involved and the acknowledged differences in migration cause-and-effect compared with those of Mid Sussex. But Crawley is a different matter. Crawley, Horsham and Mid Sussex are in the same housing market area and share very close links. Local planning authorities should ensure that their Local Plan meets the full OAN in the housing market area. Crawley is under a stated obligation to work closely with neighbouring authorities to seek a resolution to the problem of its unmet housing need; there is no evidence to suggest that a substantial proportion of this need can be met in any authority other than Horsham and Mid Sussex; Horsham has already agreed to take 150dpa of Crawley's unmet need; and it remains unclear why

similar steps were not taken in the preparation of the Mid Sussex District Plan. Indeed, Mid Sussex Council took the opposite approach by consciously reducing the allowance for neighbouring authorities' unmet need from 105 dpa in the Focused Amendments to 46 dpa when the 2014 household projections were published.

Crawley's representation to the Examination indicates that it has an adequate supply of housing for the first few years of the Mid Sussex District Plan period, but there is a significant decline in sites in its area to meet the requirement for new housing beyond Year 10 of the plan. Year 10 is only 7 years from now and even after sites are allocated it takes a number of years to get schemes to the stage where they can deliver homes. This clearly indicates that, whatever the progress of LSS3, Mid Sussex District Council should be working directly with Crawley Council, landowners and developers right now to locate developable sites or areas of land where possible.

It would not be sound planning to rely on the LSS3 work to ascertain at some unspecified date the level of Crawley's unmet need to be accommodated within a future version of the Mid Sussex District Plan. Such an approach would mean that the current District Plan would deliberately overlook a clearly identified housing need arising in only 7 years' time within its own HMA, deferring consideration to a multi-authority study in its early stages with no clear timescale. I recognise the stated intention in the White Paper to ensure the renewal of plans every 5 years, but the current District Plan must be based on present-day evidence, which on this subject is very clear.

It might be possible to modify the District Plan to incorporate a stepped housing requirement timed to coincide with the adoption of the Site Allocations DPD, in order to reflect the timescale within which Crawley's unmet need arises, and to allow for further site identification work. The District Plan would set the overall housing requirement for the 17 year plan period at a minimum of 17,442 dwellings (the Mid Sussex OAN of 876 dpa plus 150 dpa for Crawley's unmet needs) and this figure would form the basis for the Site Allocations DPD, but the annualised housing requirement would begin with the OAN figure of 876 dpa and step up later to coincide with the adoption of the DPD, in advance of the point at which housing is required to meet unmet needs in Crawley. To achieve this, the DPD would need to be adopted (as you indicate) by 2020/21, 4 years from now. The relevant annualised requirements, the date of the adoption of the Site Allocations DPD and the point at which the requirement will step up would need to be incorporated into the modified policy as firm commitments. The initial 876 dpa would be the starting point for the current 5 year housing land supply calculation. I see this as a potential way forward for the Plan and look forward to your comments.

Yours sincerely

Jonathan Bore

INSPECTOR