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Date:

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Jonathan Bore
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Dear Mr Bore,

Mid Sussex District Plan Examination: Inspector's Initial Questions (Housing)

Thank you for your letter dated 15 September. Outlined below is the Council's response to the matters you raise.

1. Further Proposed Modifications

As you suggest Documents BP2 and BP3 constitute the submitted Plan for Examination; BP4 sets out proposed modifications that were intended for consideration through the Examination; and BP1 represents a consolidated version of the Plan including these proposed modifications.

In the light of continued uncertainty nationally, about the final form of the Starter Home Policy, the Council no longer wishes proposed modifications to DP29 to be considered at this stage.

The Council considers that other proposed additional modifications to Policies, do reflect changes that have arisen from the November 2015 consultation. We have also had dialogue with key stakeholders to agree the scope of these modifications.

The most recent modifications within BP4 include a number of revisions that do follow from the last consultation and ongoing work with developers, including amendments to policy DP9/DP9A relating to the strategic allocations. Other new and substantive changes reflect other factors such as the Council's wish, in collaboration with both the Department for Communities and Local Government (DCLG) and the Homes and Communities Agency (HCA) to be an effective 'pathfinder' authority to deliver the Government's emerging starter homes initiative; and the most recent changes to the DCLG Household Projections issued on 12 July 2016.

Working together for a better Mid Sussex



In relation to the starter homes and the amended affordable housing policy, the Council has been working with DCLG and HCA to secure the early delivery of starter homes. An indication of early policy support is therefore seen as an important component in providing additional support to the business case being made for funding in order to deliver these shared goals.

The Council sent the draft proposed policy modifications to policy DP29 to all of the developers involved in the delivery of the Council's strategic housing sites and invited comment on them. No comments have been received to date, although clarification questions were received. However, it is considered too early to undertake wider consultation, as the policy is likely to evolve in order to reflect the starter homes regulations when these are issued. In addition, recent announcements by the Housing Minister, Gavin Barwell concerning the potential for starter homes to include build to rent, suggests continued uncertainty about the final model for the delivery of starter homes (with potential knock-on effects on viability), and the release date for the draft regulations.

Having reflected on your concerns about consultation, the increasing uncertainty about the form of future policy and to avoid abortive consultation and further delays to the Plan, the Council would prefer that the draft modifications to Policy DP29: Affordable Housing are held in abeyance, until the position on starter homes is clearer. The Council is content to withdraw these modifications, if this is the best way for this to be achieved although as previously indicated BP4 has been submitted as proposed modifications only.

If the decision to formally withdraw the last modification to DP29 is made, the Council is of the opinion that the policy should revert to that as set out in BP2, the Pre-Submission Draft District Plan (June 2015), and not as set out in BP3, the Schedule of Focused Amendments to the Pre-Submission District Plan (November 2015). BP2 accounts for the 'national affordable housing threshold' within National Planning Policy Guidance, set out by the Written Ministerial Statement of 28 November 2014 that was reinstated following the Court of Appeal ruling May 2016. Some 30% of the overall provision of traditional affordable housing can be demonstrated to be delivered viably on the majority of sites (see document EP43); and would meet in full the 'core' local affordable housing need (see TP1 – Introducing the Mid Sussex District Plan, Appendix 3).

The Council believes that on the assumption the modification to Policy DP29 is not promoted, the other proposed modifications to the Plan do not require consultation at this stage. This is because they have been made in response to earlier consultation, or in the case of any reduced contribution to neighbouring authorities have already been discussed as far as possible at this stage. As set out in the covering letter (BP10a) the Council has anticipated these further modifications would be consulted upon alongside any further modifications that may be made during the examination process to make the Plan sound.

The Council has also given further consideration to the other issues you have raised, as set out below.

2. Calculating Objectively Assessed Housing Need

The Council recognises the influence of the Coastal West Sussex Strategic Market Housing Assessment (SHMA) and believes it has reflected market signals, in a context in which there is a large stock of outstanding unimplemented consents, and where affordability has neither demonstrably worsened, or shown particular differences to other Housing Market Area (HMA) authorities or in the wider south east.

While the Council remains keen to meet housing needs including the delivery of sufficient affordable housing, taking account of the nature of the land, housing market structure and academic research, we do not believe there is scope to offer a sufficient increase in housing supply in our area to have any meaningful impact on affordability.

The Council considers it is making sufficient provision for employment, which contributes to the unmet needs of our neighbours, and are progressing work on a major science park.

2 (i) The Housing Market Areas (HMAs)

By way of background, for analysis and research purposes, Mid Sussex has always been treated within the wider area as a member of the North West Sussex Housing Market Area (NWS HMA) as its primary HMA and as a functionally linked neighbour to the Coastal West Sussex Housing Market Area (CWS HMA). This was established within the West Sussex SHMA (2009)¹ and confirmed in various updated studies since². This means that the CWS research and analysis does not directly include Mid Sussex, and the Northern West Sussex research and analysis does not primarily include the coastal authorities. However both HMAs acknowledge strongly the potential relationships which exist between their areas, as may be noted in the various submitted NWS HMA analyses³.

The strong level of self-containment within the Northern West Sussex HMA authorities (Mid Sussex, Crawley and Horsham) as identified within the evidence base⁴, points towards Mid Sussex being primarily within this HMA although there are inter-relationships with the CWS HMA in the south of the District, primarily due to commuting flows⁵.

In common with other authorities in the wider area, this Council's objectively assessed needs assessments (OANs) have used local authority 'building blocks' (i.e. are based on local authority administrative areas). This practical approach reflects the Planning Practice Guidance (PPG), which recommends the use of DCLG household projections, as the starting point for OANs assessments, which are available only for local authority functional areas⁶. Even if the local authority area of Mid Sussex, covered by such projections falls into two potential market areas (Northern West Sussex HMA and an overlap with the Coastal West Sussex HMA), the approach clearly both considers and addresses the need of both housing market areas.

¹ EP24i, SHMA May 2009, section 2, page 34: paragraph 2.60, page 35: paragraph 2.65 and page 36

² EP 20, HEDNA February 2015, section 2, page 17, paragraphs 2.40, 2.41, 2.42; page 27, paragraphs 2.73, 2.74, 2.77, 2.78. EP25, page 34: paragraph 3.33; EP26 section 2 page 14: paragraphs 2.1, 2.3, 2.4, page 16: paragraphs 2.11, 2.13.

³ EP20, HEDNA February 2015, page 28, paragraph 2.77. EP25, page 34: paragraph 3.33; EP26 page 16: paragraphs 2.11, 2.13 etc

⁴ EP24i, SHMA May 2009, page 15, paragraph 2.35 page 18 paragraph 2.43 EP20 page 26, paragraph 2.69

⁵ EP 24i, SHMA May 2009, page 18, paragraph 2.43, page 21, paragraph 2.46, 2.47.

⁶ NPPG 2a-015-20140306

As DCLG household projections are trend based, it also follows that the authority area-level DCLG projections reflect wider trends of past under-provision, particularly in Brighton. This means that the DCLG projections must already reflect the unmet needs of Brighton and levels of past provision in Mid Sussex.

While it is considered unlikely that the decisions on the relationship between the NWS HMA and CWS HMA can ever be calculated precisely, the issue has been the subject of varied and extensive analysis to inform past plans. The traditional starting point has been related to the physical separation between Mid Sussex and Brighton as a consequence of the South Downs National Park which clearly provides separation between the two areas (in a broadly analogous way to 'Green Belt') and affects the ability of Brighton to extend its built up area into Mid Sussex. The debate has also examined whether someone making a choice to live in a seaside city like Brighton, would consider the quieter attractions of Mid Sussex as an alternative location if an appropriate dwelling were not available. For example, the Inspector of the Horsham examination concludes in his report of examination in October 2015, at paragraph 41:

"I remain unconvinced of any considerable degree of overlap between the NW Sussex HMA and that of the coastal authorities to the south. The needs of Brighton and other nearby coast towns arise from the strong migratory pull of those wishing to live in a town by the sea; these pressures are not the same as those generated by smaller inland towns or rural communities. Although HDC have continued constructive dialogue with Brighton and Hove Borough Council (B&HBC), there has been no objection to the HDPF or firm indication of how many dwellings might be required to fulfil unmet needs there".

Like its neighbours in the NWS HMA, Mid Sussex has maintained a constructive dialogue with Brighton. Most recently I have met with Brighton and Crawley on the implications of the July 2016 Household Projections and exchanged emails agreeing that Mid Sussex lacks suitable sites to enable it to deliver sustainably more unmet needs at the present time. Mid Sussex has not received any realistic or firm indication of how many dwellings might be required in Mid Sussex to fulfil the unmet needs of any of its surrounding authorities, with authorities typically acknowledging the total level of their unmet needs only. These needs are so large that it seems unrealistic that they could ever be met by Mid Sussex alone. Brighton and Crawley have recently adopted plans where the unmet needs will be addressed at a later date, following further sub regional and cross-boundary work. Mid Sussex is fully committed to work with the Coastal West Sussex and Greater Brighton Economic Board, of which the Council is a member. The Council is also committed to working with the other NWS authorities to consider the unmet needs of Crawley. As the Crawley Local Plan acknowledges at paragraph 2.22:

The scale of unmet need of approximately 5,000 dwellings over the Plan period is fully acknowledged and has been discussed with neighbouring authorities in a constructive and effective manner, including across the Gatwick Diamond and Coastal West Sussex.

Paragraph 2.26 goes onto state:

All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.

In total, an unmet need of over 37,000 dwellings exists in neighbouring authorities. The scope for Mid Sussex to meet some or all of these needs is considered in the Land Use Consultants (LUC) *Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan, EP14.*

The various Strategic Market Housing Assessment (SHMAs) and Housing and Economic Needs Assessments (HEDNAs) for the respective areas have considered the relationships between the North West Sussex and Coastal West Sussex Housing Market Areas, particularly in terms of migration for housing and in terms of travel to work patterns. As may be observed these typically draw conclusions that include the following:

- A stronger relationship between Mid Sussex and Crawley and other rural areas such as Lewes, than between Mid Sussex and Brighton⁷.
- An emphasis on short distance migration movements between Brighton and other surrounding districts relative to strong and substantial flows between Brighton and London⁸.
- The inclusion of Burgess Hill within the most intense Brighton Travel to Work Area, with weaker relationships any further afield⁹.
- A two way relationship of daily travel between Brighton and Burgess Hill¹⁰.

None of this analysis really provides a firm basis for estimating a precise number for Mid Sussex, and I am not sure one can ever exist. It is more a question of how much can be sustainably accommodated. This issue is covered by the LUC study of the sustainability of cross boundary options. It is also an issue of 'planning balance' and site availability which we assume will be a key topic discussion at Examination. The approach has been to treat Mid Sussex as outside the Coastal HMA but a neighbour with some functional links. The reality is that the effect on the District's arising need is recognised in the DCLG figures; and furthermore it is impossible in evidential terms to say that the District or part of it falls within the Coastal HMA in the way the question perhaps implies. That approach has been taken by other examinations. The studies in relation to CWS do not acknowledge Mid Sussex as part of the Coastal HMA.

2 (ii) Market signals

The Council recognises that the evidence was perhaps not as clearly referenced as it could be on this issue; however figure 19 of the February 2015 HEDNA shows the ratio of lower quartile house prices to earnings has not significantly worsened since 2006. Indeed, while the level has fluctuated with market conditions, mainly caused by the 2008 recession and subsequent recovery and the influence of small number of larger house price transactions, the overall position has not significantly changed over about a ten year period. The Council understands concerns about affordability and wishes to see affordability improved but does not accept that the evidence supports the assertion of *severely worsening affordability*.

While completions have fallen below the revoked South East Plan 'target' of 855 dpa, the stock of outstanding commitments has remained high - in excess of 4,000 units throughout the period, and the analysis suggests that the major issue has been of a failure of developers to commence and then complete development. To a large extent the trends shown were inevitable as the South East Plan attempted at a late stage to redistribute housing requirements into Mid Sussex, as a balancing exercise for other levels of development proposed for the South East, but without any obvious evidence that such an allocation would be delivered or that there was an effective mechanism for displacing growth in this way.

⁷ EP20 HEDNA February 2015, page 89, figure 34

⁸ RD18 CWS HMA 2009, page 15, paragraph 2.36 and figure 2.9

⁹ RD18 Coastal West Sussex SHMA 2009, page 21, figure 2.14

¹⁰ EP20 HEDNA February 2015, page 23, paragraph 2.68

There is also little evidence to suggest that significant increase in housing will improve affordability. The University of Reading's "A Long-Run Model of Affordability" (2011)¹¹ commissioned by DCLG concludes that a 50% increase in private housing supply within the South East would help improve affordability by approximately 12%.

For Mid Sussex, increasing housing supply by 50% (i.e. a Plan provision of around 1,100-1,200dpa) would reduce the ratio of lower-quartile house price to earnings from 10.2 to 9 – this would still result in ratios higher than England (6.45) and West Sussex (8.88). Therefore even such a significant uplift would have no material effect.

The market signals uplift of 24dpa, as proposed in the HEDNA Addendum¹² is a calculated uplift based on household projections data, to assist the population group (those aged 20-34) with the highest affordability pressure.

The Council has also noted the conclusions drawn by the Local Plan Inspectors in our HMA. Whilst we recognise that each examination must look at matters on the basis of the evidence before it, there is an important principle of consistency also in play. Substantial amounts of work and attention were given to this point in the Horsham Examination in Public (EiP), and in his report of October 2015 at paragraph 36, the Horsham Inspector concludes, having regard to the HMA evidence, that:

"The relative position of house prices in Horsham compared with the HMA and regional and national trends is unchanged; over the period from 1998 to 2007 they have increased by similar percentages in all areas. Since 2007, Horsham house prices have again followed regional and national trends, showing notable price falls to 2009 and relatively flat indicators since. Sales volumes show a similar picture in recent years, with dramatic falls in 2008, from which they have just recovered, somewhat faster than the national average. Price/income ratios in Horsham remain just below the peak levels found in 2007 and until the last 18 months have been little changed. Absolute rises are similar to those in Mid Sussex, although affordability issues in Crawley are not so severe.

Since 2006/07 completions data in Horsham and across the HMA fell well short of the former South East Plan target, although there has been a marked pick up over the last two years, again reflecting improved market conditions. The initial slow pace of development on major development sites west of Crawley during the recession clearly had a significant impact on these figures. The Council have included a modest upwards adjustment in their OAN figure of 22 dpa to account for affordability pressure in the 25-34 age group, evidenced by substantial growth in private rented sector accommodation and the number of persons in HMOs, even though these indicators are again in line with HMA and national trends. I consider there is no strong case for a significant uplift to account for market signals in Horsham district, which are very similar to those elsewhere across virtually all of the south east. The Council's modest increase appears appropriate therefore."

2 (iii) Employment Growth

The Economic Strategy section of 'Introducing the Mid Sussex District Plan' (TP1) and the more expansive Appendix A6 (SN6: Employment and Jobs – Summary Note) set out the detailed, evidence based work that the Council has undertaken on employment matters. The Economic Growth Assessment (EGA) (EP35) was a joint exercise undertaken with Crawley Borough Council and Horsham District Council, commencing in 2013. The EGA was intended to support all three emerging Local Plans. Since mid-2013, and in accordance with the PPG requirement for up-to-date evidence, the Council has updated various parts of its evidence base.

¹¹ RD20

¹² EP22 Addendum to HEDNA August 2016, page 7, paragraph 1.38-1.44

It would not have been cost effective for Mid Sussex alone to update the whole EGA across Northern West Sussex, given progress with Crawley and Horsham's Local Plans. Mid Sussex therefore sought consultants to produce the Burgess Hill Employment Sites Study (BHES) update. **It must be noted that, despite its title, this is a Mid Sussex District-wide study.** The title partly reflects the general focus of new housing and employment development in and around Burgess Hill and also the fact that it is a two part study, with Part 2 looking in more detail at the emerging Science and Technology Park proposal to the west of the town.

The purpose of the study¹³ included a requirement to assess:

- *The potential economic impact of the business park and science and technology park allocations at Burgess Hill on comparable existing employment sites within the District boundaries and the wider Gatwick Diamond and Coast to Capital Areas.*
- *The potential impact of a second runway at Gatwick Airport and related redevelopment of parts of Manor Royal Industrial Estate upon Burgess Hill*

The Council has not set aside the findings of the EGA, which continues to form a key part of the Plan's Evidence Base. However, the Employment Sites Study update uses more recent figures from Experian alongside additional figures from Oxford Economics. It also, as does the EGA, draw upon cross boundary issues and was carried out alongside and influenced by Duty to Cooperate discussions. Both studies should carry significant weight in assessing employment needs and provision. However, it should be noted that the three local authorities and also the Local Plan Inspectors for Crawley and Horsham, all had concerns about the underlying employment figures within the EGA and the resulting overly optimistic forecasts for employment generation¹⁴. The resultant figures within the BHES are considered more likely to be realistic and reflect more recent, and lower, Experian forecasts.

The Mid Sussex Local Plan promotes 25-30 hectares of new employment land at Burgess Hill. It also provides support for a Science and Technology Park, potentially of around an additional 45-50 hectares, to support up to 2,500 high quality jobs growth. The Council has also produced its Strategic Employment Land Availability Assessment (SELAA). As with the Strategic Housing Land Availability Assessment (SHLAA), the SELAA forms a palette of potential development sites rather than a list of allocations. The SELAA also identifies capacity for new or enhanced employment floorspace. As such, the SELAA does identify a palette of sites totalling 78 hectares of potential employment land. These will be reconsidered as part of the DPD if monitoring indicates an unmet need.

Further clarification on employment land requirements was sought from Chilmark Consulting in April 2016. Chilmark's subsequent letter dated 8 April 2016 should have been included in the submission documents and has now been uploaded to the Examination Library webpage¹⁵. Chilmark's letter concludes:

"The conclusions drawn were intended to identify a realistic range from 25 hectares up to 30 hectares based on the evidence available and taking account of helping to meet external employment lands arising outside the District. The conclusion was not intended as a precise requirement as it was considered appropriate to ensure some flexibility given the NPPF's policies that expect employment land supply to address wider matters than simply land quantum, including choice, quality, sectoral-fit/mix of sites as well as ensuring that there is not a blanket protection to existing employment land which is no longer capable of forming a B Use Class function.

¹³ EP22, Addendum to HEDNA August 2016, page 14, paragraph 1.11

¹⁴ RD16, Horsham Inspectors report, page 8, paragraphs 19 and 21. RD17 Crawley Borough Council Inspector's report, page 21 paragraph 74 and 75

¹⁵ EP36i

A range from 25 hectares up to circa 30 hectares was considered an appropriate and realistic response, which together with the District Plan's policies allowing new employment land / floorspace development subject to appropriate planning criteria coupled with the proactive monitoring of employment floorspace provision during the plan period, offers a coherent basis to satisfy employment land needs identified in the District as well as supporting un-met needs arising in neighbouring authorities."

The POPGROUP software was also used to derive jobs growth that arises from housing growth. The identified employment growth is assumed to already be in the EGA/BHESS forecast as these are trend based.

The District Council did not specifically adjust the OAN for housing to reflect the workforce jobs figures of the BHESS or EGA since the DCLG projections already reflect anticipated growth trends. However, the Council is satisfied that the proposed employment floorspace will meet employment needs arising locally and make a contribution towards wider needs.

In Duty to Cooperate discussions with neighbouring authorities¹⁶, a wide range of subjects have been covered including gypsy and traveller provision and employment issues. The District Council is working very closely with its neighbours on employment matters through the Greater Brighton Economic Board and the Gatwick Diamond. Mid Sussex also has a very close working relationship with the Coast to Capital LEP, including submission of two bids for Local Growth Fund support for the Burgess Hill Growth Area which will support delivery of employment floorspace.

In its Duty to Cooperate, Mid Sussex has been very positive about its ability to accommodate growth in floorspace to assist in meeting unmet employment needs from neighbours in addition to its commitment to consider their wider housing needs. The discussions are reflected in the Memorandum of Understanding produced in conjunction with Brighton and Hove City Council and in the Northern West Sussex Authorities' Position Statement. The newly adopted Brighton and Hove City Plan does not specify an unmet employment need figure. Paragraph 5.10 of the Crawley Local Plan, also newly adopted, does address this issue. Importantly, it also reflects the reduction in employment land needs for Crawley, from 77 hectares down to 57.9 hectares, following Crawley's 2015 EGA update. This leaves a shortfall within the town of 35 hectares, which the Crawley Plan confirms (para 5.14) will be addressed properly through discussions following resolution on Gatwick Airport's future expansion. The adopted Horsham Planning Framework also identified a shortfall of employment floorspace to meet future needs over the Plan period, although the amount is not specified.

The Council continues to make extensive efforts to support a key objective of Members to achieve economic growth, to link housing and employment provision in a sustainable manner and to help meeting neighbouring unmet needs. Sufficient allocation of employment land is proposed to meet local needs, promote sustainable development and contribute towards neighbouring needs.

¹⁶ BP17

3. Calculating the Housing Requirement

We believe our SHLAA has been correctly and robustly undertaken and that in the absence of further information, the sites identified as developable are correct in terms of a sound plan. The SHLAA remains a live document and we will take account of further progress on the delivery of strategic sites in the context of the District Plan.

It is important to note the large number of proposals that are currently the subject of appeals and Secretary of State call-in. It is reasonable to assume some will be granted permission thus easing the short term housing supply.

The Council will undertake a site allocation Development Plan Document (DPD), probably in 2020/21, after the adoption of the District Plan which will consider all sites which are available, suitable and deliverable at this time.

The Council has also already consulted with Crawley and Brighton authorities on the implications of the increased DCLG Household Projections and the potential effect of these, if realised, in reducing our potential contribution to our key neighbouring district's unmet needs.

The detailed Duty to Cooperate work with neighbours has demonstrated that whilst the Mid Sussex District Plan can make a contribution to the unmet needs of neighbours, it cannot be responsible for resolving all the unmet needs of the housing market areas. The Council is also acutely aware of the challenges of short term delivery of housing sites and sustainable provision.

The Council intends the expression 'Tipping Point' to refer to the point at which a series of small effects becomes significant enough to start to cause a larger, more important change in the overall sustainability balance; in this case where negative sustainability effects are beginning to be greater than the positive sustainability effects. This term is not intended to refer simply to the constraints aspect of the exercise, but has been used to describe the planning balance exercise that has been undertaken within the Sustainability Appraisal, bearing in mind the requirements of paragraphs 14 and 152 of the National Planning policy Framework (NPPF).

3. (i) The Strategic Housing Land Availability Assessment (SHLAA)

The methodology for the SHLAA is based on the guidance set out in the PPG. The full methodology was updated in February 2015 and published on the Council website within the Examination Document Library as part of Document EP27. A common methodology was agreed across the NWS HMA with Horsham and Crawley. A developer workshop was held on 13 January 2015, chaired by the former Chief Planning Inspector, Peter Burley. The purpose of the workshop was to enable developers and agents to feed into the process of preparing the SHLAA. In particular, views were sought on the methodology, typologies of sites, as well as discussion about the consistency of the Assessment. The agreed minutes have been published in Appendix 2 of the Main report of the SHLAA¹⁷. There were no significant concerns raised by participants to this methodology.

¹⁷ EP27i

As you suggest, the PPG states that where constraints have been identified, the assessment should consider the action that would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Accordingly, the constraints and actions section of the SHLAA assessment for each site sets out issues that need to be overcome for a site to become developable. The Council undertakes an annual call for sites when updating the SHLAA and this is an opportunity for the developers/landowners/agents to submit information to demonstrate that constraints can be overcome. The onus has to be on developers to submit sufficient material for the assessment as the Council lacks resources to practically investigate constraints on all sites, or commission studies to determine issues such as access or flood risk or the viability of any required strategic transport upgrades. This means that the assessments necessarily rely on the best information available.

The authority also welcomes evidence from developers on how these constraints may be overcome and the SHLAA is reviewed on an annual basis and is updated to reflect new information on sites that is received from developers. The Council has also proactively checked the position of key sites which have been submitted in the calls for sites, but not promoted through the District Plan process. For example, land to the east of Crawley, Crabbet Park.

Broad locations and a location for a new settlement have been robustly assessed through the SHLAA process. However, it is unrealistic that a new settlement could be allocated and delivered in the first part of the plan period and the only option on the table – Mayfield, which straddles the boundary of Horsham and Mid Sussex – was rejected at the Horsham Examination¹⁸ on the basis of there being no need for significant increase in the amount of development, significant concerns about the sustainability of the site and doubts about deliverability in the face of strong opposition.. The Council has not received any substantive material which suggests how issues such as delivery, land ownership, transport or flood risk can be overcome on this site. As a speculative proposal it would also wish to consider the site against other new strategic development options that may come forward in the future as part of a future DPD. The Council will, of course, consider new settlement options and urban extensions which may come forward in the medium term, such as Crabbet Park and west of Burgess Hill, which could be considered as site allocations within this future DPD exercise, if sufficient material is provided to overcome issues of delivery by site proponents. It should be noted that, as is understood by the Neighbourhood Plan groups, a future DPD would not confine itself to strategic sites of over 500 and consider all potential allocations, regardless of size, beyond an agreed windfall level, for example 6 units and over, taking into account Neighbourhood Plan reviews that might be underway.

On the specific issue of suitability and as a peer challenge to the Council's work, Land Use Consultants¹⁹ undertook a review in January 2015 of the landscape constraints of SHLAA sites which were achievable and deliverable. The remit of this study was to establish if any sites that had previously been ruled out on landscape grounds had some capacity for development. The conclusions of this work were fed into the SHLAA assessments and the conclusions of the SHLAA were amended to take into account the findings of the study. This ensured that a robust and consistent approach to landscape was applied in the assessment.

¹⁸ RD16, Horsham Inspector's Report, page 23- 24, paragraphs 84-89

¹⁹ EP29

Within the SHLAA process, in accordance with the agreed methodology, sites are assessed in terms of their *suitability, availability and deliverability*. There are currently 11 sites which have been rejected in the 'suitability' category alone, where the Council has also received representations from promoters. Of these, there are two sites which would fall within the category of 'strategic site' (able to accommodate more than 500 units):

- Land west of Imberhorne Lane, East Grinstead (550 dwellings) which is unsuitable due to the lack of proposals to resolve the longstanding and clearly evidenced traffic constraints in East Grinstead. This site has been previously identified as a strategic allocation but has ultimately proven undeliverable.
- Haywards Heath Golf Course (500 dwellings) which is considered unsuitable for a combination of landscape, access and proximity to a Site of Nature Conservation Interest (SNCI). Whilst further evidence from developers may demonstrate that the landscape and access constraints could be overcome, there are also doubts about the availability of the site. The golf course is currently leased to the Golf Club, meaning that the land owners may not be able to release the land for development, within the Plan period, due to the constraints of the lease. Without this issue being addressed the Council is unable to demonstrate that this site could be delivered.

Of the remaining nine non-strategic sites, one has recently been granted consent on appeal (land south of Sunte House) and one is currently at appeal (land south of Scamps Hill, Lindfield). The remaining seven are rejected on a range of issues, typically of transport, access and transport or landscape considerations. Like many authorities which are unable to demonstrate a 5 year land supply, in consents or through the allocation of an adopted Plan, Mid Sussex has experienced a rush of applications from developers wishing to capitalise on the opportunities presented by the effects of paragraphs 14 and 49 of the NPPF in suspending the application of normal supply policies, presenting something of a 'free for all'. However, despite this window, it is notable that many of these sites have not come forward as applications.

Crabbet Park, which has the potential to deliver in excess of 2,000 dwellings, has been under discussion for the past 10 years or so and was an option for development in the draft Core Strategy. However, the site has not been promoted in the current District Plan process, but has been subject to Sustainability Appraisal. The Council does not believe this site could be allocated within a sound Plan at the current time.

In the Council's view a further reiteration of the SHLAA to reassess these sites or any other sites is not required at this stage as the methodology is demonstrably robust and, in the absence of new evidence, it is unlikely to bring forward any further sites as deliverable. This is because of the relatively short amount of time since the SHLAA was published in April 2016 and ongoing work to consider site delivery and suitability.

A small update on the latest housing sites that have been granted planning permission and sites allocated in a Neighbourhood Plan has been provided in Annex A as part of the response to your Question 4.

The Council has already committed to undertake a further site allocation DPD to deal with any medium to long term requirements in the Plan period (beyond 5-6 years). As shown in the Strategic Sites Paper, the main constraint to additional sites is the timescale of their deliverability. Once again, as these assessments are robust, no assumed revision of criteria at this stage would be likely to produce a sound basis for the Plan. As outlined above, the future site allocation DPD would look at all sites regardless of size, beyond an agreed windfall threshold, for example 6 dwellings and above.

3 (ii) Unmet Need

The issues here are similar to those concerning the account that has been taken of the HMA area. Mid Sussex is neighboured by many authorities with adopted Plans which collectively do not meet the housing needs of the area. The total level of unmet need from neighbouring and nearby authorities is very large. Brighton alone has an unmet need of 846dpa. As such, the total level of unmet need within the Northern West Sussex and Coastal West Sussex HMAs is over 37,000 dwellings for the Plan period. It is unlikely to be sustainable for Mid Sussex, being one of the last to be adopted, to pick up the 'remainder'.

As indicated above the Council remains uncertain as to the basis of any firm calculation of the needs Mid Sussex should meet. It is not clear within the NPPF/NPPG where there is a requirement that the amount of unmet need an authority should assist with should be a clearly calculated figure. It is more reasonably a judgement call based on the data available and discussions with neighbouring authorities and the results of sustainability appraisal. The NPPF paragraph 182 refers to the need to address unmet requirements from neighbouring authorities "*where it is reasonable to do so and consistent with achieving sustainable development*".

The "*number of dwellings available to accommodate unmet need*" referred to in your letter is, of course, more of a supply issue and as such is more factual and based on the SHLAA. This is a clearly calculated figure and represents the capacity (but not a cap) of Mid Sussex to meet its own housing need as well as assisting neighbouring authorities. The SHLAA also identifies the total capacity of the District in terms of sites at a point in time, based on an assessment of the suitability, availability and achievability of sites.

Duty to Co-operate discussions with our neighbours have explained in detail our evidence base. These are summarised in Duty to Cooperate statements²⁰. Mid Sussex has also undertaken a Sustainability Assessment of Cross-Boundary Options (document reference EP14) and the SHLAA in order to set out the District's potential for accommodating neighbour's unmet need. Memorandums of Understanding (MOUs) have been signed to this effect.

The figure of 105dpa set aside for unmet need in the Focused Amendments version of the District Plan has reduced following the release of the DCLG 2014 data. Both Crawley and Brighton & Hove, based on the most up to date evidence, have agreed that the figure would reduce to 46dpa as Mid Sussex housing need had increased, while the delivery of a sustainable supply of housing sites has not.

3(iii) The Sustainability Appraisal (SA) and 'Tipping Point'

The Council intends the expression 'Tipping Point' to refer to the point at which a series of small effects becomes significant enough to start to cause a larger, more important change in the overall sustainability balance.

This concept of the 'tipping point' is an evolution of the thinking and evidence identified by Land Use Consultants (LUC) in EP14: *the Sustainability Assessment of Cross-Boundary Options for the Mid Sussex District Plan*. LUC identify a point at which there is a likelihood of significant sustainability effects.

²⁰ BP17

The *Sustainability Assessment of Cross-Boundary Options* assessed that there were significant positive social effects, but significant negative environmental effects predicted for any option that increased the District's housing provision by 5,000 in addition to meeting the District's own need²¹. At the time this study was written, it was assumed that Mid Sussex had an Objectively Assessed Need of 530dpa over a 20-year Plan period, and therefore an additional 5,000 would mean a total housing provision of 780dpa. It was at this point, LUC felt, that significant effects would be more likely – both positive and negative.

The Council's Sustainability Appraisal (BP5) took account of this evidence when appraising the 6 housing provision options. It was also able to draw on further and updated evidence produced, particularly on housing supply (notably the SHLAA).

As housing provision increases, positive benefits increase in terms of providing homes within Mid Sussex to meet the District's need, and unmet need from other authorities²². This accords with LUC's findings.

Negative impacts also get worse as the housing number increases, particularly on environmental objectives. Bearing in mind the requirements of paragraphs 14 and 152 of the NPPF, a planning balance exercise was undertaken within the Sustainability Appraisal to determine the most sustainable housing provision option, which the Council has described as the "tipping point". The tipping point of 800 is not an absolute figure but a guide to where the balance of significant impacts or the effects get worse.

In essence a balance needs to be struck to ensure the option chosen has many positive benefits (particularly social/economic) but these are not markedly outweighed by negative impacts (particularly environmental). In conducting the assessment, the Council has had regard to the advice in paragraph 14 of the NPPF, and examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits. In the context of Mid Sussex it is also highly relevant that a considerable proportion (50%) of the District is designated Area of Outstanding Natural Beauty (AONB)²³ and is under the influence of European designations²⁴. Only 4% of the District is not covered by one or more secondary constraints or not already built on²⁵.

In order to form a balanced and holistic view, therefore, the Council has assessed the sustainability of the various housing provision options (identified in terms of net new housing completions per annum) in various ways:

- (1) By assessing the options against the full range of sustainability criteria, making judgements about the degree to which those criteria would or would not be met (the Housing Provision appraisal above, summarised in Table 30 and 31 of the Submission Sustainability Appraisal (SA));
- (2) By examining as a sub-set of that exercise the areas in which the various options most clearly diverged (Table 32 of the Submission SA);

²¹ EP14, Land Use Consultants Sustainability Assessment of Cross Boundary Options, page 35, paragraph 5.3

²² EP14, Land Use Consultants Sustainability Assessment of Cross Boundary Options, page 35, paragraph 5.5

²³ EP47, Capacity of Mid Sussex to Accommodate Development, June 2014, page 4.8, figure 2.3 and page 58, paragraph 6.3

²⁴ EP47, Capacity of Mid Sussex to Accommodate Development, June 2014, page 58, paragraph 6.4

²⁵ EP47, Capacity of Mid Sussex to Accommodate Development, June 2014, page 61, paragraph 6.24, figure 6.1

- (3) By making a judgment about the overall effect of the various options bearing in mind what the Council consider to be the key criteria for this policy: housing provision, economic growth, and environmental protection (principally landscape resource conservation). This is an important exercise because some of the criteria are incommensurable, and a tight focus on those that particularly matter to the overall sustainability of the Plan has been thought to be helpful in judging between the different alternatives.

The Tipping Point therefore represents the planning balance, weighting objectives, assessing likely impacts and therefore determining the most sustainable option for housing growth, based on available sites. The identification of a 'tipping point' within the SA is not intended to be a development 'cap' but as balanced and holistic view as is practical of the likely impacts on social, environmental and economic strands of sustainability and the range of provision where current options for housing growth go from being sustainable to potentially unsustainable.

4. The 5 Year Land Supply

The Council accepts that the guidance suggests that it needs to meet the shortfall as soon as practicable but also notes there is no required method. The Council considers it would not be compatible with evidence based delivery focused planning to spread the shortfall over the first five years as this would run a high risk of 'planning to fail'.

The Council considers that the Liverpool method remains appropriate given the nature of our sites, and the fact that we have already included a 20% buffer, or an extra year's land supply in the 5-year supply. The historical completions rates average 518 for the past 12 years, and 661 completion over the past 5 years. Whilst we would note that we have shown stronger delivery in the past couple of years, reaching 863 dwellings in the year to April, this is exceptional and the target of 800 dwellings per year will be a very challenging one for the Council to achieve.

The use of the Liverpool method in the context of the District Plan is related to the circumstances of the available housing land supply in terms of the delivery of the strategic sites and the absence of available sites which are deliverable in the first five years. The Council will be working with developers to look at ways in which sites may be brought forward in the medium term in the context of a site allocations DPD, once the Plan is adopted. We would also hope to encourage early applications on additional sites as and when current constraints are overcome.

The proposed provision of 800 dpa is a significant increase in the supply of housing, and developers need to play their part in bringing sites with planning permission/allocations forward in a timely manner. The historical completions rates average 518 dpa for the last 12 years, and 661 completions over the past 5 years.

Whilst we would note that we have shown stronger delivery in the past couple of years, reaching an exceptional 863 dwellings in the year to April, the target of 800 dwellings per year will be a very challenging one for the Council to achieve without the support of developers.

It is reasonable for smaller settlements to spread their housing delivery over the Plan (Neighbourhood Plan) period. In some cases there is no evidence, aside from the allocation, that the site will come forward, e.g. the land is not in control of a developer.

It should be noted that while the 5 year supply may appear marginal, it includes a 20% buffer – effectively a further year's worth of growth. It is also a continually improving picture as a further three Neighbourhood Plans have been made since its last iteration and two of the main Towns' plans have received Examiner's reports, one of which will allocate land for a further 637 units. A summary of these sites is provided at Annex A.

There are also a number of current appeals, call-in applications and recovered appeals that could serve to boost supply, if the appeals are upheld. A table summarising these cases is annexed to this letter (Annex B) and accounts for almost 1,000 possible dwellings in the planning process. The high proportion of recovered cases reflects, of course, the relationship of these proposals to an adopted neighbourhood plans and follows the announcements made by the Secretary of State in 2014, since renewed, concerning additional Secretary of State recovery criteria for neighbourhood plan-related cases.

Details of the current assumed delivery trajectories are included at Annex C and Annex D for Pease Pottage and Northern Arc Burgess Hill, respectively.

The Pease Pottage site was included as the next ranked site from the Site Selection Paper (EP23) which also met the 'footnote 11' criteria. It is also the subject of live applications. The applicant has made a further submission which aims to develop the exceptional circumstances case for the proposal independently of the District Plan and is seeking an early determination, ahead of allocation in the District Plan. The choice of a draft allocation in the AONB was not made lightly, but subject to careful analysis including in relation to the alternative sites available to meet needs, especially in the five year period. This is set out in the Strategic Site Selection Paper and Council report November 2015²⁶. The application is included as part of the submitted documents for the District Plan as document references RD1 and RD2.

The Pease Pottage site makes a potentially positive contribution to meeting housing needs, notably in the north of the District, and adjacent to Crawley, a town with its own substantial unmet needs. Evidence has been submitted with the planning application submission which considers the site in terms of alternative provision to meet Crawley's needs. This, too, suggests an acute absence of sustainable urban extension sites, which are deliverable now, around Crawley. Further evidence has also been submitted with the application relating to the exceptional circumstances that are required to justify the application, and the application includes a new primary school, upgrades to infrastructure and land to enable the relocation of a hospice.

If granted, the Pease Pottage proposal will also assist the overall housing trajectory, and enable the delivery of homes at a very early stage of the Plan period. It will also assist in meeting Crawley's unmet need. The housing trajectory envisaged by developers, Thakeham Homes, (set out in its Design and Access Statement) is considerably more optimistic than that included in the District Plan, delivering over the period 2017 to 2023 and peaking at 150 dwellings per annum, as compared with MSDC's own more cautious projection of 50 dwellings per annum.

The Northern Arc allocation (Policy DP9) is likely to be made up of applications from three developers – Rydon, Gleeson and Wates, and the Council maintains regular discussion with all three developers. These discussions centre on a site wide masterplan and the timely provision of infrastructure. The Homes and Communities Agency are also in discussion with the developers to help secure the early delivery of the scheme, as it represents one of the largest growth proposals in the South East. As reflected in policy DP9 an important issue is to resolve site-wide infrastructure including a new spine road. The Council already has growth fund monies secured to support the upgrade of the A2300.

The first planning application was submitted to the Council in September 2016, for 130 dwellings by Rydon for the eastern section of the site. Officers are in pre-application discussions for a second application from Rydon for 450 dwellings (this includes the first application for 130 dwellings). Current indications are that this will be submitted by the end of the October 2016. The decision to structure the application in this way appears to support the early delivery of the 130 dwellings in the first application. Further early applications are likely on the western side of the site.

²⁶ EP23, EP66 i

Discussions with developers suggest that the trajectory on the Burgess Hill allocation is being affected by the absence of a District Plan. This relates to the certainty around the allocation itself, and the relative attractiveness of other easier to deliver, smaller, competing sites in the current 'open window' afforded by the Council's lack of a 5 year land supply in an adopted Plan or in consents and which does not incentivise delivery of this allocation. The Council is therefore understandably very keen to progress the Examination and make progress towards the adoption of the District Plan.

5. Distribution of Housing

The issue of appropriate levels of housing provision has been a matter considered in examining each Neighbourhood Plan. In the case of the District's main towns, the examiners have either concluded that these plans have made adequate provision; and have also acknowledged the difficulty of local environmental and infrastructure constraints, and agreed with the flexibility that is applied to policy in order to facilitate meeting any housing need over the Plan period. This means other (non-allocated) housing proposals would be supported where the site *inter alia* contributes to sustainable development.

In order to support the localism agenda, as promoted through the Localism Act and the National Planning Policy Framework (paragraphs 183-185), the Council's development strategy approach is for the location and nature of any 'remaining development' accounting for the District Plan strategic development allocations, to be identified through Neighbourhood Plans.

Significant progress has been made on Neighbourhood Plans ahead of the District Plan. Of the 20 Neighbourhood Plan areas that cover Mid Sussex, 16 are either made or have successfully passed referendum with only two areas with no draft Plan. The Neighbourhood Plan process has so far delivered allocations in the order of 2,000 dwellings.

The issue of appropriate levels of housing provision has been a matter considered in examining each Neighbourhood Plan. In the case of two of the district's main towns, the examiners concluded that the Neighbourhood Plans made adequate and appropriate provision. At East Grinstead the difficulty of local environmental and infrastructure constraints was acknowledged, with flexibility applied to policy in order to facilitate meeting any housing need over the Plan period whereby other (non-allocated) housing proposals would be supported where the site *inter alia* contributes to sustainable development.

To support the Neighbourhood Plan process, the Settlement Hierarchy was formed to guide where possible, the distribution of the 'remaining development' in Mid Sussex towards the most sustainable locations. The HEDNA (2015)²⁷ provides an indication of the level of housing need for each Parish. This, too, was intended to assist in guiding the forming of Neighbourhood Plans.

It would be difficult and, we think, inappropriate for the Council to apply these numbers as absolute and impose top down targets for the level of development directed towards individual settlements. For instance, in many cases the parishes cover wide areas with numerous and sometimes very limited settlements and such an approach would likely result in an exercise of development redistribution by the District Council. In any case, such an approach was considered to put at serious risk support for the neighbourhood planning process by the parishes, latterly putting at risk undermining the findings of Neighbourhood Plan examiners and adopted Neighbourhood Plans.

²⁷ EP21 HEDNA Update November 2015, page 36, table 24

As one of the areas at the vanguard of neighbourhood planning, any attempt to impose new targets or growth allocations within the agreed scope of Neighbourhood Plans would seem to seriously undermine the Government's neighbourhood planning agenda. Agreement of the level of development was therefore considered a better judgement through the Neighbourhood Plan process, whereupon this exercise could sit alongside detailed local level work examining existing constraints to development; and potential future constraints to development such as infrastructure or transport; or the availability of suitable sites.

However, the Council is committed to preparing a Site Allocations DPD to enable the Plan's housing requirement to be delivered in full in the later years of the Plan period. The exact housing figure that the Site Allocations DPD will provide for will be determined through the Monitoring Report and will take into account Neighbourhood Plan delivery, delivery rates generally and the amount of completed windfall development. This process will have regard to the Settlement Hierarchy and at the same time utilise the Neighbourhood Plan evidence base to identify existing constraints to development; potential future constraints to development such as infrastructure or transport; and the availability at this stage of suitable sites, especially the Strategic Sites where it is hoped that a number of delivery and suitability issues will have been resolved.

The Town and Parish Councils may also choose to update their plans during the Plan period, which may also deliver further housing sites. Progress on any such plans will be accounted for in forming the Site Allocations DPD.

6. Housing Density

Proposed Plan densities are considered in the Density Topic Paper (document reference TP3). The basis of the paper is an analysis of densities in existing towns and other relevant developments, including those elsewhere in the UK.

Evidence has shown that without density guidance, such as from a site allocation policy, developers are not building at densities that represent efficient use of land. The Council is seeking to introduce a density policy, in accordance with the NPPF, to address this issue.

The densities proposed for existing towns are considered to protect their character and be compatible with recently achieved densities²⁸. With this context in mind, the Council believes that controls on density and place making are quite limited in their ability to ensure positive contributions to character and place making terms, and in line with normal planning practice will consider the contribution that proposals make to townscape and place making and make planning decisions '*on their own merits*'.

In response to representations on the Focused Amendments from Consultation in November 2015, the Council is proposing a reduction in the density for the strategic sites from 45dph to 40dph.

²⁸ TP3 Density Topic Paper June 2016, Appendix 1 sets out densities that have been achieved in the District.

7. Summary and Conclusions

I hope that the above helps to clarify the Council's position on the issues and concerns you have raised. We are familiar with many of them from our discussions with developers, and from representations received. The Council considers that it has soundly taken these issues into account in preparing the submission Plan. Both the Council and its advisers believe that the submitted Plan has been prepared alongside a robust evidence base and is a sound document that is ready to be taken through the Examination process.

The Council places significant priority on progressing the Examination and achieving an adopted Plan with a 5-year land supply at the earliest opportunity.

The Council is firmly of the view that the District Plan should progress as soon as practically possible to hearing sessions to enable the Council to engage in a thorough discussion of these issues alongside other matters that you will want to consider as part of the Examination process.

The philosophy behind the District Plan is to support the principles of Localism by taking a bottom up approach to plan making through Neighbourhood Plans.

The policies in the Plan support this approach whilst protecting the special characteristics of the district. Our work has been challenging and robust ensuring the Council has considered all options and potential to bring forward sustainable growth.

The Council has worked closely with developers, particularly those involved in the strategic allocations to secure supportive policies and in the case of the Northern Arc we are working with the HCA to secure potential funding to bring pace and certainty to the delivery of housing by forward funding infrastructure. In support, the Council has invested in the establishment of a growth team to assist in this work.

The Council is committed to sustainable growth and the submitted District Plan is fundamental to securing this. The Plan, of course, raises several important issues which interrelate. The Council has taken a big step forward in overall housing provision since the withdrawn version of the Plan. Once you have read the content and had the opportunity to look at the evidence base referred to in full we would encourage you to revert to us once more before the Examination.

Yours sincerely,



Chris Tunnell MRTPI
Head of Economic Promotion and Planning

Annex A: Update to housing supply since 1st April 2016

Neighbourhood Plans

		New units into supply	Additional to five year supply	Sites	Comment
Ashurst Wood	Made June 2106	87	11	Small sites	
Balcombe	Made September 2016	42	28	Balcombe House Barn Field	
Bolney	Made September 2016	35	35	Queens Pub Bolney house	
Albourne	Made September 2016	2	2	Small site	
East Grinstead	Passed Examination, Referendum October 2016	411	174	Town Centre (129) Ashplatts (45)	
Haywards Heath	Passed Examination, to be approved by MSDC ahead of referendum	637	265	Rocky Lane (190) Beech Hurst (15) Harlands Road (40) Downlands Park (20)	Hurst Farm 150 units already included in 5 year supply
Total		1214	515		

Annex A: Update to housing supply since 1st April 2016

Planning Applications approved (over 6 units)

Reference	Site	Units	Comment
DM/15/5107	Land north of Rocky Lane, Haywards Heath		30 already in 5 yr. supply (#745) (Resolution to grant)
DM/15/4506	Nonsuch Cottage, Lowdells Lane, East Grinstead	6	Not in SHLAA net 5
AP/16/0001 AP/15/0049 DM/15/1161 DM/15/3787	Land Adjacent To Barn Cottage, Cuckfield Road, Ansty,	8	Was in year 6+ (#626)
DM/15/3415	Birchen Lane, Haywards Heath	Up to 40	Not suitable (#33)
DM/15/4862	Land south Sunte House, Haywards Heath	8	Not suitable (#32)
DM/15/5067	Martells Dept Store, East Grinstead		129 (counted in NP above) 100 already in year 6+ (#768) (Resolution to grant)
DM/15/5045	Hook Place, Cuckfield Road, Burgess Hill	8 units	Suitable in year 1-5 (Resolution to grant)
Total		70	

Annex A: Update to housing supply since 1st April 2016

Pending Applications

Reference	Site	Units	Comment
DM/15/0626	Rear of Friars Oak, Hassocks	Up to 130	Suitable year 11+ (#221)
DM/16/2740	Land east and west of Dirty Lane, Ashurst Wood	30	
DM/16/2180	South Rocky lane, Haywards Heath		REM for 134 following DM/16/1312 already a commitment
DM/16/2347	Land south Bolney Road, Ansty	20	
DM/15/2830	Dunnings Mill, East Grinstead	13	
DM/15/0855	Phoenix House, 23 -25 Cantelupe Road, East Grinstead	12	PDOFF
DM/16/3427	Phase 5b, Bolnore (former 4b), Haywards Heath	Increase of 22 to original permission	
DM/16/3026	Reed Pond Walk, Haywards Heath		18 units Renewal of existing permission
DM/16/1803	Penland Farm, Haywards Heath		210 units replace existing permission
DM/16/2333	Barrington Close, Haywards Heath	49	
DM/16/3119	Barn Cottage, Scaynes Hill	51	
DM/16/2718	Keymer Tile Works, Burgess Hill		REM for phase 2 170 units, already a commitment
DM/16/3027	70 Victoria Road, Burgess Hill	12	
DM/16/3947	South of Freeks Farm, Burgess Hill	130	Northern Arc first application

Annex A: Update to housing supply since 1st April 2016

Reference	Site	Units	Comment
DM/16/2204	Kings Ways		REM for Phase 2 87 units already a commitment
DM/15/4667	Bridge Hall, Burgess Hill	Up to 30	
DM/16/1775	Hassocks Golf Club, Hassocks	Up to 130	
DM/16/2990	Golf House, Horsham Road, Pease Pottage	25	
	Total	654	

Annex B: Major applications at appeal

Reference	Site	Units	Type	Inquiry date	Officer rec	Decision	SoS
AP/16/009 DM/15/0429	Hill Place Farm, East Grinstead	up to 200	PI	25/10/16	Refusal	Refusal	
AP/16/0016 DM/15/3614	West of Turners Hill Road, Crawley Down	Up to 44	PI	31/01/17	Permission	Refusal	Call-in
AP/16/0037 DM/15/3979	West of Turners Hill Road, Crawley Down	Up to 30	PI	31/01/17	Permission	Refusal	Call-in
AP/16/0040 DM/15/4094	Land south of Hazel Close, Crawley Down	Up to 60	PI	07/03/17	Permission	Resolve to approve	Call-in
AP/16/0038 DM/16/2330	Land south of Hazel Close, Crawley Down	Up to 30			Permission	Resolve to approve	Holding direction
AP/16/0040 14/04492/FUL	Land rear of 88 Folders Lane, Burgess Hill	73	PI	No date	Refusal	Refusal	
AP/16/0055 DM/15/4457	South of Scamps Hill, Lindfield	Up to 200	PI	06/06/17	Permission	Refusal	Call-in
DM/15/1467	Kingsland Laines, Reeds Lane, Sayers Common	40			Permission	Permission	Holding direction
AP/13/0007 12/01540/OUT	Kingsland Laines, Reeds Lane, Sayers Common	Up to 120					To be re-determined

Annex B: Major applications at appeal

Reference	Site	Units	Type	Inquiry date	Officer rec	Decision	SoS
AP/14/0052 13/03818/OUT	Ham Fields, London Road, Hassocks	97				Refusal	To be re-determined
AP/16/0061 DM/15/4076	Greenacres, Keymer Road, Burgess Hill	8	WR		Permission	Refusal	
DM/16/1012	Land east of Gravelye Lane, Lindfield	Up to 130	PI	No date	Permission	Refusal	
Total		Up to 932					

Annex C: Delivery Trajectory -Pease Pottage

Two planning applications have been submitted for the Pease Pottage site. One is an outline application for approximately 600 dwellings, a care facility, community building, cafe, retail and a primary school. A second application is a detailed application for 156 dwellings, care facility, shop, case and community building.

The Trajectory used by the Council is based on 50 dwellings per year, which is the Council's general experience from one developer.

	Year 1	Year 2	Year 3	Year 4	Year 5	5 year total units
Year	2016 -17	2017 -18	2018 -19	2019 - 20	2020 – 21	
Progress	Planning permission granted	Conditions discharged, ground works commenced	50	50	50	150

It should be noted that in the Planning Statement submitted by the developer, a much faster delivery rate is forecast.

	Year 1	Year 2	Year 3	Year 4	Year 5	5 year total units
Year	2016 -17	2017 -18	2018 -19	2019 - 20	2020 –21	
Progress	Planning permission granted	Conditions discharged, ground works commenced 50 units delivered	100	150	150	450

Annex D: Delivery Trajectory - Northern Arc Allocation, Burgess Hill

The Northern Arc allocation (Policy DP9) is likely to be made up of applications from three developers – Rydon, Gleeson and Wates, and the Council is in regular discussion with all three developers. These discussions are around a site wide masterplan and the provision of infrastructure. The Homes and Communities Agency are also in talks as to how they can support the early delivery of the scheme, as one of the largest growth proposals in the South East. As reflected in policy DP9 an important issue is to resolve site-wide infrastructure including a new spine road. The Council already has growth fund monies to support the upgrade of the A2300.

The first planning application was submitted to the Council in September 2016, for 130 dwellings by Rydon for the eastern side of the site. We are in pre-application discussions for a second application from Rydon for 450 dwellings (including the first application for 130 dwellings). Current indications are that this will be submitted by the end of the October 2016. Further early applications are likely on the Western side of the site.

The delivery trajectory is based on the last information submitted by the developer to the Council based on 3 outlets (Gleeson/Rydon, Wates and Rydon).

	Year 1	Year 2	Year 3	Year 4	Year 5	5 year total units
Year	2016 -17	2017 -18	2018 -19	2019 - 20	2020 – 21	
Progress	Planning permission granted for initial phases	Conditions discharged, ground works commenced on site April 2018	100	175	240	515