

MSDC 8c

MSDC response:

- **On the matter of the proposed policy DP5: Housing**
- **On the matter of the wording of proposed policy DP6: Settlement Hierarchy**

Appendix 1: Parish OAN Distribution – Summary Methodology

Note:

Policy order

It is proposed that the policy relating to Settlement Hierarchy (DP6) and Housing (DP5) are swapped around so that the Settlement Hierarchy Policy appears before the Housing Policy to improve flow. The change will appear in the final version of the Plan.

On the matter of the wording of proposed policy DP6: Settlement Hierarchy

(Note: This policy will be renumbered DP5 in the final version of the plan)

Development beyond settlement boundaries

The Council has received post-hearing correspondence on the proposed wording to Policy DP6. This suggests that the policy as submitted, specifically bullet point two: ‘...2. The site *adjoins* an existing settlement edge...’ has the potential to introduce uncertainty to the acceptability of development to applicants, local communities and decision makers.

The crux of representations centres on a concern that current policy wording has the potential to introduce the acceptance for development to cross clearly defined and logical development boundaries such as roads or landscape features and introduce ribbon type development or incongruous sprawl with the potential for a ‘domino type’ release of successional housing sites, given compliance with the policy as currently worded.

The Council wishes to explore the acceptance of a proposed change to the wording of the policy that it considers clarifies the parameters of acceptable sustainable development outside defined built up area boundaries, whilst not altering the thrust of the policy which seeks the sustainable development of small scale housing sites that can seamlessly fit in with the fabric of existing development and/or logically ‘round off’ settlement edges.

It is perhaps unavoidable that whatever wording is used, it is in open to a degree of interpretation, particularly given the desirability of such development by proponents but the Council considers that the proposed wording will provide a much greater degree of certainty to all on the parameters of acceptability and the sustainability of such development.

The Council considers that bullet point two should read:

‘...2. **The site is coterminous with an existing built up area of the settlement;** and...’

The Cambridge English Dictionary defines coterminous as ‘*having or meeting at a shared border or limit*¹’. This is considered to be a fair definition of the thrust of this part of Policy DP6 as outlined above.

The Council will carefully monitor Policy DP6 and will if necessary review the policy should it require amending. As such, a further indicator should be included in the Monitoring Schedule as outlined below.

The Council would also like to take the opportunity to clarify a further point with Policy DP6. It should be made clear that the requirements set out in the three bullet points are interconnected and the policy would benefit from the introduction of the word ‘*and*’ between bullet point one and two. The proposed amended is outlined below.

The Council would also like to ensure that the policy is not used in a way the results in piecemeal urban sprawl. It would like to include an additional sentence to safeguard against this. The additional sentence should read:

¹ <http://dictionary.cambridge.org/dictionary/english/coterminous> (online) Available at: <http://www.cambridge.org/us/cambridgeenglish>. Accessed April 2017

‘..The developer will need to satisfy the Council that:

- the proposal does not represent an underdevelopment of the site with regard to Policy DP24, or:
- a large site is not brought forward in phases that individually meet the threshold but cumulatively does not.

The following amendment is suggested to the Monitoring Schedule:

DP6: Settlement Hierarchy	2, 6	Housing commitments by parish Neighbourhood plan monitoring	Increase	Mid Sussex District Council, Town and Parish Councils	Mid Sussex District Council monitoring
		Number of applications for new dwellings reliant on Policy DP6 overturned on appeal	Zero	Mid Sussex District Council	Mid Sussex District Council monitoring

The following amendment is suggested to the Glossary:

Coterminous - *having or meeting at a shared border or limit*

DP5: Settlement Hierarchy

Strategic Objectives: 2) To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence; 8) To provide opportunities for people to live and work within their communities, reducing the need for commuting; 9) To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community; 12) To support sustainable communities which are safe, healthy and inclusive; and 13) To provide the amount and type of housing that meets the needs of all sectors of the community.

Evidence Base: Settlement Sustainability Review.

Development will be permitted within towns and villages with defined built-up area boundaries. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale (with particular regard to DP24: Character and Design), and not cause harm to the character and function of the settlement.

The growth of settlements will be supported where this meets identified local housing, employment and community needs. Outside defined built-up area boundaries, the expansion of settlements will be supported where:

1. **The site is allocated in the District Plan, a Neighbourhood Plan or subsequent Development Plan Document or where the proposed development is for fewer than 10 dwellings; and**
2. **The site ~~adjoins~~ is coterminous with an existing built-up area of settlement; and**
3. **The development is demonstrated to be sustainable, including by reference to the settlement hierarchy.**

The developer will need to satisfy the Council that:

- The proposal does not represent an underdevelopment of the site with regard to Policy DP24; or

A large site is not brought forward in phases that individually meet the threshold but cumulatively does not.

Category	Settlement characteristics and function	Settlements
Category 1	Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements.	Burgess Hill, East Grinstead, Haywards
Category 2	Larger villages acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield
Category 3	Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill and West Hoathly
Category 4	Small villages with limited services often only serving the settlement itself.	Ansty, Staplefield, Slaugham, Twineham and Warninglid
Category 5	These small settlements have very limited or no services.	Hamlets such as Birch Grove, Brook Street, Hickstead, Highbrook and Walstead.

On the matter of the proposed policy DP5: Housing

(Note: This policy will be renumbered DP6 in the final version of the plan)

Policy DP5: Housing sets a revised minimum housing requirement of 15,942 at an average of 938 homes per annum (inclusive of a stepped trajectory from 876dpa to 1,026dpa). An updated table to show the sources of supply has been updated to give the most up to date position as at 1st April 2017.

The revised policy now provides a spatial distribution of the housing requirement. The minimum requirement over the whole plan period has been distributed by settlement category. The minimum residual requirement from 2017 onwards is also distributed by settlement category. Further direction is provided to Parishes in the policy which also includes the required minimum provision for the first 8 years of the Plan.

A note which explains how the distribution has been arrived at is attached at Appendix 1.

Due to the extensive changes that have been made to DP5 and the supporting text, track changes have not been used and the policy is set out in full below:

DP6: Housing

The Objectively Assessed Need (OAN) for housing has been established as 14,892 (an average of 876 dwellings per annum). This is based on the Government's most up-to-date household projections and an uplift to improve affordability, as required by Government Guidance (The evidence that underpins this figure is explained in Chapter 3 under 'Meeting Housing Needs').

The District Plan sets a minimum housing provision figure of 15,942 homes in the period 2014 – 2031 (an average of 938 dwellings per annum) which will therefore meet the Objectively Assessed Need as well as contributing towards the unmet need of neighbouring authorities, primarily the unmet need within the Northern West Sussex Housing Market Area. For the purposes of calculating the 5 year supply a stepped trajectory will be applied. The annual provision figure is 876 dpa for years 2014/15 until 2023/24 and 1,026 dpa for the years 2024/25 until 2030/31.

The National Planning Policy Framework requires local planning authorities to identify sites sufficient to provide five years' worth of housing against their housing requirements, with a 20% buffer where there has been a persistent under delivery of housing. It has been assumed that the 20% buffer is applicable to Mid Sussex, until it can be demonstrated that the District Plan housing requirement has been persistently met. The housing trajectory that accompanies the Plan therefore shows the 5 year supply position and a 20% buffer against the District Plan requirement of 876 per annum.

The start date of the Plan in terms of housing delivery is 1st April 2014. A total of 630 new homes were built between 1st April 2014 and 31st March 2015, 868 new homes were built between 1st April 2015 and 31st March 2016 and 912 new homes were built between 1st April 2016 and 31st March 2017. These count towards meeting the overall target. As at 1st April 2017, there were 7,111 commitments within the planning process. This leaves a remaining target of 6,421 to be identified. 3,500 new homes will be delivered as part of the strategic development to the north and northwest of Burgess Hill.

The spatial strategy of the District Plan is to focus the majority of housing and employment development at Burgess Hill as it has greater potential to deliver sustainable communities and to benefit from the opportunities that new development can deliver than at East Grinstead and

Haywards Heath. A smaller-scale development is proposed at Pease Pottage as a contribution towards meeting the needs of the Northern West Sussex Housing Market Area. The remainder of development will be delivered at the other towns and villages to support economic, infrastructure and social needs whilst maintaining the settlement pattern and where possible enhancing the quality of the rural and landscape character of the District. The District Council's preference is that the location and nature of additional development be identified through Neighbourhood Plans.

The National Planning Policy Framework allows local planning authorities to make an allowance for windfall sites in the housing supply if there is compelling evidence to do so. A Windfall Study has been prepared to provide the evidence for such an allowance based on past delivery. This demonstrates that 45 units per year could be delivered on small windfall sites from year 6 of the Plan period onwards, providing a further 450 units. This allowance has been identified as a source of supply to meet the overall target. No allowance is made for large windfall sites to avoid double counting within the SHLAA.

The District Council will prepare a Site Allocations document to enable the Plan's housing requirement to be delivered in full. In addition, the Council will explore the potential to realise brownfield land housing capacity through the preparation of a Brownfield Sites register.

The Council will continue to engage constructively and on an ongoing basis with the authorities in the Northern West Sussex Housing Market Area to monitor housing supply and in order to explore the opportunities for each local planning authority to identify and seek to enable additional housing development capacity. The Council is a participant in the West Sussex and Greater Brighton Strategic Planning Board which has begun work on the question of unmet housing needs in the sub-region. The Council will continue participation in that process through work on Local Strategic Statement 3 (LSS3) with the aim of agreeing the final level of unmet need, and how it should be met across the sub-region.

DP6: Housing

Strategic Objectives: All.

Evidence Base: Burgess Hill: A Town Wide Strategy; Burgess Hill: Visioning the Future; Feasibility Study for Development Options at 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.

Policy DP5 sets a minimum District housing requirement of 15,942 homes between 2014 – 2031, at an average of 938 homes per annum. This will comprise:

District Plan minimum Requirement	15,942
Completions 2014/15	630
Completions 2015/16	868
Completions 2016/17	912
Total Housing Commitments (including sites with planning permission, strategic development at Kings Way, Burgess Hill (DP8) and Pease Pottage (DP9a) and	7,111

allocations in made Neighbourhood Plans)	
Strategic development north and north-west of Burgess Hill	3,500
Windfall Allowance	450
Elsewhere in the District, as allocated through future Neighbourhood Plans, the Site Allocations document and identified SHLAA sites (years 1 – 5).	2,491

Spatial Distribution of Housing Requirement

Settlement Category	Settlements	Minimum Requirement over Plan Period	Minimum Residual from 2017 onwards (accounting for completions and commitments)
1	Burgess Hill, East Grinstead, Haywards Heath	10,341	1,066
2	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield	2,847	1,116
3	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill and West Hoathly	2,153	290
4	Ansty, Staplefield, Slaugham, Twineham and Warninglid	151	19
5	Hamlets such as Birch Grove, Brook Street, Hickstead, Highbrook and Walstead	N/A	N/A ²
Total		15,942	2,491

A Housing Trajectory is set out in Appendix A. This will be updated annually through the Monitoring Report.

Neighbourhood Plan Strategy

The preparation of Neighbourhood Plans is a key part of the strategy for the delivery of housing. Twenty Neighbourhood Plan Areas have been designated in Mid Sussex, covering all of the Towns

² Assumed windfall growth only

and Parishes within the District Plan Area. As at April 2017, 16 of these plans have been 'made'. The adopted Neighbourhood Plans have contributed 1,770 new dwellings to the housing supply, with many of these allocations delivering completions during the next 5 years.

Based on the overall housing requirement, the minimum housing requirement for each settlement for the first 8 years of the Plan (until 2021/22) has been calculated. This shows that the majority of settlements have sufficient commitments to meet their need until at least 2021/22, when existing commitments and historic completions have been taken into account. Therefore, the District Plan requirement and stepped trajectory does not suggest that Neighbourhood Plans will need to be reviewed within the next 5 years (as at May 2017), although Town and Parish Councils may choose to do so in order to boost supply or for other reasons.

The Council will provide further guidance on the future need and requirements, beyond 2021/22, as part of the Monitoring Report in line with the spatial growth strategy set out in this policy. The amount of development planned for in each settlement will need to have regard to the settlement hierarchy, and also take account of local development needs including any significant local infrastructure and other constraints to development.

Taking the District Plan requirement over the first 8 years of the plan and to cover the period until 31st March 2022, each settlement should make provision for the housing numbers set out in the table below. Existing completions, allocations in made Neighbourhood Plans, and existing planning consents (including past windfalls) can contribute towards this requirement.

Settlement Category	Settlement	Required Minimum Provision 2014/15 - 2021/22
1	Burgess Hill	2,681
	East Grinstead	1,067
	Haywards Heath	1,118
2	Cuckfield	139
	Hassocks	322
	Hurstpierpoint	247
	Lindfield	244
	Copthorne	194
	Crawley Down	194
3	Albourne	25
	Ardingly	32
	Ashurst Wood	48
	Balcombe	35
	Bolney	50
	Handcross	N/A ³
	Horsted Keynes	30
	Pease Pottage	437 ²
	Sayers Common	28
	Scaynes Hill	217
	Turners Hill	73
	West Hoathly	19
	Sharpthorne	19
4	Ansty	59

³ The required minimum provision at Pease Pottage (Slaugham Parish) is significantly greater than other settlements within Category 3 due to the allocation and subsequent permission granted for 600 homes within this settlement. Due to this, the other settlements within Slaugham Parish (Handcross, Slaugham and Warninglid) will not be required to identify further growth through the Plan process on top of windfall growth.

	Staplefield	1
	Slaugham	N/A ²
	Twineham	11
	Warninglid	N/A ²

Appendix 1: Parish OAN Distribution – Summary Methodology

1. This paper sets out the methodology and individual housing requirements for the towns and parishes, which will form the basis of the District Plan strategy policy. It addresses the Inspector’s request in ID20 to establish *the approximate number of dwellings expected in each settlement or groups of settlement*.
2. Policy DP6 of the District Plan establishes the Settlement Hierarchy. This has been developed to identify five categories of settlement within the district based on characteristics and function. The spatial distribution of housing will follow the settlement hierarchy.
3. The quantity of dwellings to be provided at each settlement or groups of settlements has been determined based on the District Plan housing requirement of 15,942 (based on a stepped trajectory of 876dpa for years 2014/15 – 2023/24, 1,026 for years 2024/25 – 2030/31. This is an average of 938 dwellings per annum). The distribution would need to be updated to reflect the final agreed requirement.

District Plan: Objectively Assessed Need and Housing Provision

4. The District Objectively Assessed Need (OAN) has been established as 14,892 for the period 2014-2031, an average of **876** dwellings per annum.
5. The assumption is that the District Plan sets a minimum figure of 15,942 homes for the period 2014-2031. This is based on an annual provision of 876dpa for years 2014/15 until 2023/24 and 1,026dpa for the years 2024/25 until 2030/31. This is an average of **938** dwellings per annum. The District Plan is therefore proposing sufficient housing to meet the district’s housing need as well as contributing towards the unmet need of neighbouring authorities.

Parish Distribution – Principles of the Approach

6. The District’s housing need and provision figures are based on the requirements of national planning policy (NPPF) and its accompanying guidance (National Planning Practice Guidance - NPPG). The NPPG gives guidance on calculating district-wide requirements based on the Government’s household projections, however these are not available on an individual Parish basis. A number of assumptions and adjustments therefore need to be made in order to distribute the district total of 938dpa to individual settlements and/or groups of them.

Stage 1 – Establishing Town/Parish OAN (i.e. ‘Policy-Off’)

7. The individual OANs for each Parish have been calculated by splitting the district OAN proportionately based on the number of households in each settlement according to the most recent Census (2011). For example, Burgess Hill accounted for approximately 21% of the district’s households, so receives 21% of the district’s OAN. This is the approach previously set out in the HEDNA and its updates.

Plan Period Requirement: 15,942

Annual Requirement: 938

	Proportion of Households % (Census 2011)	OAN
Albourne	0.45	73

Ansty and Staplefield	1.12	190
Ardingly	1.21	207
Ashurst Wood	1.27	206
Balcombe	1.32	216
Bolney	0.90	150
Burgess Hill	21.27	3,424
Cuckfield	2.52	402
East Grinstead	19.40	3,061
Hassocks	5.86	907
Haywards Heath	20.33	3,173
Horsted Keynes	1.13	181
Hurstpierpoint and Sayers Common	5.00	806
Lindfield	4.43	688
Lindfield Rural	1.78	293
Slaugham	1.98	317
Turners Hill	1.32	216
Twineham	0.19	33
West Hoathly	1.46	242
Worth	7.05	1,157
Mid Sussex	100	15,942

Stage 2 – Policy Adjustments (i.e. ‘Policy-On’)

8. Whilst the OAN gives a useful indication of need within each parish, there are a number of ‘policy-on’ adjustments to be made to these figures to inform the District Plan spatial strategy. This is because the District Plan makes policy choices (such as allocating strategic sites) which influence the spatial strategy.
9. Adjustments have been made to the OAN figures to account for:
 - **Parishes with multiple settlements** – Stage 1 has been based on Parish proportions as Census data as available at this level, but the settlement hierarchy is based on individual settlements. Some parishes have numerous settlements, so adjustments have been made to account for this.
 - **District Plan allocations at Burgess Hill and Pease Pottage** – Strategic allocations at these settlements mean that the parishes of Burgess Hill and Slaugham (Pease Pottage) are delivering in excess of their OAN established at Stage 1. The ‘over-supply’ in these locations relieves pressure on other parishes and therefore reduces their housing requirements.
 - **Settlements within the AONB** – A number of settlements are wholly within the High Weald Area of Outstanding Natural Beauty (AONB). As this is a protected landscape in national policy terms, development should be focussed towards areas with lesser protection. A discount has therefore been applied to parishes within the AONB, with the rest proportionately re-assigned to less constrained settlements.
 - **Completions and Commitments** – As the plan is already 4 years into its life, there have already been a number of housing completions alongside commitments (allocations, planning permissions, etc). An allowance has been made for settlements that are currently planning for housing supply in excess of OAN.
10. Based on the above, the ‘Policy-on’ provision has been established as follows:

Category	Settlement	'Policy-on' Plan Provision	Category Plan Provision	Annual 'Policy-on' Provision	Provision 2014/15 – 2021/22		
1	Burgess Hill	5697	10,341	335	2681		
	East Grinstead	2267		133	1067		
	Haywards Heath	2375		140	1118		
2	Cuckfield	295	2,847	17	139		
	Hassocks	685		40	322		
	Hurstpierpoint	525		31	247		
	Lindfield	517		30	244		
	Copthorne	412		24	194		
	Crawley Down	412		24	194		
	Albourne	53		3	25		
3	Ardingly	68	2,153	4	32		
	Ashurst Wood	102		6	48		
	Balcombe	75		4	35		
	Bolney	105		6	50		
	Handcross	0		0	0		
	Horsted Keynes	64		4	30		
	Pease Pottage	929		55	437		
	Sayers Common	59		3	28		
	Scaynes Hill	462		27	217		
	Turners Hill	155		9	73		
	West Hoathly	41		2	19		
	Sharpthorne	41		2	19		
	4	Ansty		125	151	7	59
		Staplefield		3		0	1
Slaugham		0	0	0			
Twineham		23	1	11			
Warninglid		0	0	0			
			15,942	15,942			

Stage 3 – Residual Amount and 'To Find'

- After accounting for completions, commitments, District Plan allocations and windfall, there is a residual amount of **2,491** dwellings still to be identified. The spatial distribution of the residual amount should be in accordance with the settlement hierarchy.
- Accounting for completions between 2014-2017 and commitments for each settlement, including the fact that some have already delivered more housing than their OAN, the residual amount 'to find' at each Parish for year 2017/18 onwards has been calculated:

Category	Settlement	Residual Provision 'to find'	Category Plan Provision 2017/18-2030/31
1	Burgess Hill	0	1066
	East Grinstead	1065	
	Haywards Heath	0	
2	Cuckfield	193	1116
	Hassocks	334	
	Hurstpierpoint	0	
	Lindfield	535	

	Copthorne	27	
	Crawley Down	27	
3	Albourne	40	
	Ardingly	27	
	Ashurst Wood	0	
	Balcombe	28	
	Bolney	46	
	Handcross	0	
	Horsted Keynes	52	290
	Pease Pottage	0	
	Sayers Common	21	
	Scaynes Hill	0	
	Turners Hill	65	
	West Hoathly	5	
	Sharpthorne	5	
	4	Ansty	0
Staplefield		0	
Slaugham		0	19
Twineham		19	
Warninglid		0	
		2,491	2,491

13. The figures account for over-provision at Burgess Hill being used firstly to address any residual requirement at the adjoining settlements of Hurstpierpoint and Ansty. Similarly, over-provision at Pease Pottage means that other settlements within Slaugham parish will not be expected to contribute further towards the District's residual figure.

Translation into Policy

14. In translating this spatial strategy into policy the Council has found it most logical to recast the scope of both policies DP5 and DP6. Formerly DP5 was about overall housing requirement and DP6 set out the settlement hierarchy. In the proposed modifications the policies are now reversed so that the settlement hierarchy is identified ahead of the requirement and its distribution.

15. During the life of the plan it is likely that the settlement requirements will need to change in response to:

- The allocation of additional sites by the District Council e.g. through the Site Allocations DPD
- Under or over-delivery by settlements – albeit the figures are assumed to be minima
- The identification of future constraints

16. As a result of these issues the Council has decided to specify the settlement specific figures for the next five years only (2017/18 – 2021/22) and an aggregated requirement by settlement category thereafter. The Council proposes to provide an updated position for individual settlements through the Annual Monitoring Report. The Council will always ensure that this requirement is for a minimum five years. This approach also allows for reallocation within settlement categories; for example, if one of the category 1 settlements is unable to meet its requirements it is assumed that, in the first instance, the requirement will be met by other category 1 settlements. However, it should be noted that a fuller reassessment is likely to be required.