

**Contact:**

Chris Tunnell 01444 477322  
E-Mail: [chris.tunnell@midsussex.gov.uk](mailto:chris.tunnell@midsussex.gov.uk)

**Your Ref:**

**Our Ref:** CT/LM

**Date:**

8<sup>th</sup> March 2017

Mr Jonathan Bore, MRTPI  
Inspector  
c/o 260 Collingwood Road  
Sutton  
Surrey  
SM1 2NX

Dear Mr Bore,

I refer to your letter of 20 February 2017 which continues to be carefully considered by the Council.

During the hearings you have made a number of helpful statements about the importance of the Council achieving a sound Plan as quickly as possible. As you know the Council has been working on this Plan since 2014 so naturally there is a desire to secure it quickly; particularly in the context of delivering the significant, Government backed growth planned for Burgess Hill.

In July 2015 the then Secretary of State, Rt. Hon Greg Clark MP wrote to the Planning Inspectorate (PINs) emphasising the importance of Inspectors and Councils working together to achieve sound Plans as quickly as possible. This was supported by a Ministerial Statement on the same day.

Your interim findings on housing provision indicate that you are satisfied that the unmet need of Brighton should be properly addressed through the existing sub regional LSS3 mechanism and that an appropriate timescale for this work is likely to be within five years.

At the same time as the Examination hearings were considering housing matters, the Government issued its White Paper, "Fixing the Broken Housing Market". Within the White Paper there are a number of proposals including the introduction of a standardised approach to assessing housing requirements, the requirement to agree a Statement of Common Ground and five yearly Plan reviews. Consultation on two of these matters will take place very soon.

In the light of these material developments and the Ministerial Statement referred to above, the Council suggests that it may be premature to agree components of the housing requirement at this stage.

The housing requirement consists of two key components, the 'full objectively assessed need' (i.e. the objectively assessed need (OAN) and a market signals uplift) together with any unmet need in the housing market area.

The Council has listened to your views that a 20 percent uplift for market signals would have a significant impact on affordability. It is less convinced; indeed it believes it may have a negative effect in terms of slowing down delivery to improve market conditions. However, the Council is willing to accept this level of uplift on the basis that this may provide a substantial early contribution to housing supply.

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This results in an OAN of 876 dpa. The issue of unmet need is a little more uncertain as the White Paper proposes that authorities in areas with unmet housing need will be required to work together to agree a Statement of Common Ground setting out how unmet housing need will be addressed. This will present a new way of considering unmet need which will complement the LSS3 work already underway. Importantly Crawley has been invited to join the LSS3 and will be participating in this work.

Therefore the Council suggests that an appropriate way forward at this stage is to incorporate an OAN of 876 dpa; approaching the issue of all unmet need in the sub region through the existing LSS3 work. This work is likely to be aligned within the timeframe Crawley indicated their needs will arise. Furthermore, the outcome of the LSS3 work will be supported by the proposed requirement to agree a Statement of Common Ground, together with a standardised approach to the assessment of housing requirements. This will be safeguarded by the proposed requirement for Plans to be reviewed, in part or in full, at least every five years.

Therefore the LSS3 sub-regional approach (incorporating Crawley) and the provisions of the White Paper (above) present an opportunity to align work to look at housing needs, comprehensively across both housing market areas.

The above, together with other suggestions you have made, have the potential to deliver a sound Plan quickly.


Initial analysis demonstrates that, if combined with your suggestion that the Council does not need to identify all sites at this stage for the full plan period, subject to assessment, it is possible to establish a requirement and demonstrate an early 5 year position, on 876 dpa, while leaving the question of sites to meet later requirements to the site allocations DPD. As you know the DPD will be in place by 2020/21 and will consist of all sites of more than 10 dwellings per hectare in size.

Given the current infrastructure deficit in the District, this amount of growth will place further pressure and additional infrastructure may be required beyond that which can be delivered by S106/CiL contributions. We hope the Government will continue to support us in investing in critical infrastructure to support this growth.

The Council hopes that you agree that the above may provide a pragmatic way forward in the light of the White Paper and the Ministerial Statement of 2015. It has been discussed with planning officers at Crawley Borough Council.

The Council is very keen; as I am sure you are, to secure an adopted Plan as quickly as possible.

Yours sincerely,



Chris Tunnell  
Interim Head of Economic Promotion and Planning