

**Contact:**

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**Your Ref:**

**Our Ref:** CT/LM

**Date:**

1<sup>st</sup> June 2017

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

Dear Mr Bore,

Please find attached a note (MSDC18) from the Council on the implications of the Wealden decision on the soundness of the District Plan. This takes account of your interim conclusions of 20 February, and recent additional evidence relating to the timing of Crawley's unmet need.

The issue arising from the Wealden decision is one of in combination traffic and potential resulting nitrogen deposition effects on the SAC parts of the Ashdown Forest.

The Council proposes that the Plan be progressed to adoption with a housing provision at 876 dpa given there is no overall traffic impact on the Ashdown Forest roads at this level of growth. This position is based on an in-combination assessment and suggests there is not an overall net effect on traffic levels through the Ashdown Forest and is subject to the final HRA.

This approach also supports the early delivery of housing at the strategic allocation at Burgess Hill and allows the Council to meet the needs of the HMA for the first half of the overall plan period. To maintain a rolling 5-year land supply the Council anticipates undertaking a full or partial review of the Plan, which would revisit the issue of sites. The Council would also work with neighbouring authorities to ensure an overall sound strategy.

The Council is not in a position to assess the Habitats implications of provision above 876 dpa because of uncertainty as to the sites that would be allocated to meet this higher number of dwellings at the current time. This means the Council does not have the ability to complete an HRA for higher growth options and demonstrate a Habitats-sound plan at this time. The assessment of traffic through the Ashdown Forest is sensitive to both location and scale of development, and can only be reliably undertaken based on fairly firm assumptions as to the location of additional growth. While there are a number of site possibilities for future growth, none of these options have been able to demonstrate deliverability at the current time. It is also considered important that decisions on what may be acceptable at later stages of the plan period are made when the full response to the Wealden decision implications have been established. It is also important that options are not ruled out in the current period of uncertainty.

At 876 dpa, some assumptions have to be made as to the location of development relative to the submitted plan at 800 dpa. The Council has already submitted its assumptions for a 5 year supply position in MSDC 15 for 876 dpa and these sites are assumptions in the transport modelling.

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As you will be aware the Wealden decision has created a number of uncertainties and very practical challenges in terms of demonstrating a sound plan. This Council has given this issue considerable thought and conducted an in combination traffic assessment approach that it and its advisers judge to be thorough, reasonable and robust in the current circumstances. The Council believes the plan could be found sound on the basis of a maximum 876 dpa, and sees no reasons now to delay in progressing the Plan and supporting early delivery of much needed housing.

Yours sincerely,

A handwritten signature in cursive script that reads "Chris Tunnell". The signature is written in black ink and is positioned below the "Yours sincerely," text.

Chris Tunnell  
Special Adviser – District Plan