

Supplementary Note to the Mid Sussex Plan Examination

1. This note is to clarify the Mid Sussex District Council (MSDC) position on issues that have been raised since the submission of MSDC18.
2. MSDC has proposed (in MSDC 18) that having reviewed the implications of the **Wealden** Decision, it is able to meet needs of 876 dwellings per annum and avoid significant impacts on the Ashdown Forest. This reflects the results of an in combination transport modelling exercise and is subject to Habitats Regulation Assessment.
3. The Transport modelling exercise, which MSDC has undertaken, allows for provision in total of 17,797 homes. This comprises completions (since 2008 as the base date of the model) of 5,234 dwellings (of which 2,426 dwellings have been completed since the Plan's start date of 2014); commitments (with planning permission) of 5,086 dwellings; existing allocations in the Mid Sussex District Plan and Neighbourhood Plans of 5,824 dwellings; the delivery of growth in line with the settlement hierarchy set out in MSDC 8c (based on expected housing sites beyond the 5 year supply) of 1,158 dwellings; and a proportionate windfall allowance of 495 dwellings.
4. Within the transport modelling exercise extant planning consents have been treated as commitments. This is because the Council believes that extant permissions in its area will be implemented. Although it is aware that some European guidance suggests that unimplemented consents should be treated as discretionary, the Council does not believe that it is practical to attempt to revoke or revisit extant consents (or refuse any reserved matter applications) in the light of concerns about impacts on the Ashdown Forest.
5. MSDC is not able to identify deliverable sites which would be able to meet any higher housing requirements at this stage with any certainty, despite working with developers to bring development forward. In reaching this conclusion, it notes that several of the strategic sites that might be allocated to meet any higher housing requirement in the future are located close to the Ashdown Forest. It suggests that further consideration of these sites will be possible when the overall position on the Wealden decision becomes clearer.
6. MSDC notes that provision at 876 dpa is sufficient to meet identified needs and reflects the timing of the unmet needs of Crawley and Horsham until 2024/25 as set out in MSDC 16. MSDC 18 acknowledges the Inspector's interim conclusions of 20 February 2017, suggesting longer term needs of 1,026 dpa. However, as outlined above, the Council is not able to indicate how this requirement will be met at this stage. A clearer position on the Ashdown Forest will assist. In addition, the issue of need will be reviewed and revisited prior to 2024/25 in the light of up to date evidence.

7. MSDC commits to prepare a Sites Allocation DPD. This is to ensure that the Council can retain a 5 year land supply. This work will commence in 2018, subject to the adoption of the District Plan.
8. MSDC commits that, as at present, the SHLAA will remain continuously 'live' and open for new sites. The Council will also work with landowners and developers through the development of a site allocation DPD. New sites will be assessed within a reasonable time period and an assessment proforma will be published, indicating the current status of these sites. Although the SHLAA is not a policy document, the status of assessed sites is informative of their overall planning status. In addition, MSDC will carry out a Call for Sites process in 2017. This will also provide information on previously developed land suitable for housing, and, those sites which comply with the relevant criteria set out in the Town and Country Planning (Brownfield Register) Order 2017, will be included in the Brownfield Register Part 1.
9. The Council will work with site proposers to assess potential impacts on the Ashdown Forest, providing access to its assessment tools and up to date in combination assumptions about growth.
10. The Council commits to review the plan at 5 year intervals or in line with any Guidance, regulation or statutory provision made in the light of the 2017 Housing White Paper or subsequent policy review.
11. In the meantime MSDC will continue to engage constructively and on an ongoing basis with the authorities in the Northern West Sussex HMA and work with the West Sussex and Greater Brighton Strategic Planning Board through work on the LSS3.
12. The Habitats implications of the recent Wealden decision are significant. It is essential that the Council can demonstrate a Habitats compliant Plan. The Council has taken advice on this complex matter and believes the position outlined above and in MSDC 18 is the most pragmatic way of achieving a sound Plan; an objective that all parties agree is a priority.