

**Submission by the Sussex Branch of the Campaign to Protect Rural England (CPRESx) in respect of the public examination hearings scheduled for 25<sup>th</sup> and 26<sup>th</sup> July 2017 into aspects of the draft Mid Sussex District Plan 2014 – 2031.**

**This submission addresses agenda items 1 – 3 dealing with housing numbers and settlement allocations, and documents MSDC 8c and 16.**

1. **Introduction:** Whilst CPRESx does not believe that an annual District housing target of a minimum of up to 1,026 dpa is sustainable or deliverable, this submission addresses certain practical issues that would arise if such a target were to be proposed for adoption by MSDC.

## 1 Agenda item 1

- 1.1 **Housing Target Step-up in Housing Policy DP5:** CPRESX questions whether it would be more sensible and potentially more readily deliverable if the housing policy were amended to stagger the step up in the housing target to 1,026 dpa incrementally over a longer period, rather than in a single step in 2024/25, especially as there is a significant number of outstanding housing commitments.
- 1.2 **MSDC 16 and Crawley's longer term unmet need.** CPRESx suggests that any needed discussion over MSDC's capacity to meet the estimated excess housing needs of Crawley in the last year of the Plan should start with a recognition that the already approved 600 home Pease Pottage development was expressly intended to meet Crawley's unmet needs, albeit earlier than that need actually arises. Given that Crawley's unmet need supposedly only arises in 2025 and that MSDC's contribution to neighbours' unmet needs is expected to be set at 150dpa, the Pease Pottage development alone would satisfy that need for the following 4 years. Consideration of further expansion of the Pease Pottage site or its neighbourhood would not be needed before 2028/9, if at all, and then only to meet local parish needs.

## 2. Agenda item 2

**Completion roll-out commitments:** Given the likely pressure that MSDC is going to be under consistently to meet a housing target far higher than its historic record indicates is deliverable, even at OAN level, CPRE would like to see the Plan's housing policy include a paragraph in which the Council makes it clear that, to the extent that it legitimately can, it intends to require developers of larger sites to commit to a development programme for completion of their scheme (or phases of their scheme) as part of the formal approval process. Such commitments would help MSDC's level of confidence in their 5 year housing delivery requirement.

## 3. Agenda Item 3

- 3.1 **Plan Making and DP5 (Housing):** An annual housing delivery target in proposed policy DP5 of up to 1,026 would require as many as 3,842 additional new dwellings created during the Plan period over and above those that have been appraised by MSDC as part of its submission draft Plan housing policy. This will be a major stretch for the Council. It raises a number of policy practical and sustainability issues that have not yet been considered in the pre-submission plan process, or where they have been, it was in the context of MSDC's Sustainability Appraisal determination that 800 dpa was the maximum sustainable annual target. The issues we raise here are deemed material to the Plan development process by the NPPF. So, CPRESx considers that DP5 (or an alternative Plan policy) needs to be expanded to address
  - (i) what types, mix and size of extra housing the Plan should be promoting, and where, (as per NPPF para 159), if necessary by updates to the Strategic Housing Market and Land Availability Assessments so that this is not at the whim of developers, and so that MSDC can react constructively to individual development proposals as envisaged by NPPF para 154. We do not think that it can be assumed without examination, for example, that the housing mix needed to satisfy the unmet overspill from Crawley Borough will necessarily be the same as the District's existing mix;
  - (ii) whether the additional housing proposals should affect the overall proportion of new housing targeted as affordable for the purposes of policy DP29 (or indeed reinforce the case for the currently proposed proportion of affordable homes);
  - (iii) how to limit the impact on the District's already deficient infrastructure, including its health, security, community and cultural infrastructure and other local facilities, and to create strategic

priorities in infrastructure development, given the additional stress that would be caused by stretching the development balloon so hard;

- (iv) how to ensure climate change mitigation and adaptation, conservation and enhancement of the District's natural and historic environment, including landscape, in line with the last bullets of NPPF paras 156 and 157 and para 165 etc;
- (v) the practical impact of the more detailed settlement hierarchy proposals, including the mathematical exercise in MSDC 8c that distributes the additional housing amongst the parishes, on existing neighbourhood plans, especially the smaller rural settlements.

None of these core planning issues, all of which would contribute to the Plan's sustainable development and to the opportunities to secure net development gains (NPPF paras 152 and 153), is addressed in document MSDC 8c. The examination hearings should provide an opportunity for MSDC to explain how they can deliver sound policies and strategic prioritisation compatible with these NPPF plan making objectives in the context of a far higher housing target than has been hitherto been appraised.

- 3.2 **Brownfield site prioritisation in DP5 (Housing):** The only statement in the draft Plan's spatial strategy for new housing relating to brownfield land development is "*The Council will explore the potential to realise brownfield land housing capacity through the preparation of a Brownfields Sites register*". Whilst welcoming the commitment to produce (and presumably maintain up to date?) a brownfield sites register, this statement should include a commitment to identify deliverable sites will as such; nor does it give weight to the Government's positive encouragement of the prioritisation of brownfield sites (including publicly owned sites) for new housing – encouragement that is expected to be given still further weight through changes initiated via both the Housing & Planning Act 2016 and in the Housing White Paper.

CPRESx calls on MSDC to amend its revised draft Housing Policy so as to include an express statement that proposals for development of sustainable brownfield sites will be encouraged, especially from SME builders, and will be prioritised over greenfield site development. Also that deliverable sites will be identified as such in the register.

- 3.3 **Viability:** NPPF para 173 provides that "*Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.*" The NPPF imposes that burden on the planning authority. CPRESx is concerned to ensure that MSDC is not exposed to arguments from developers that delivery of the required proportion of affordable homes at given strategic locations is not financially viable for them. CPRESx has in mind particularly the recent experience in Horsham District where the Council was effectively coerced by a developer on viability grounds to accept an 18% affordable home target for its North of Horsham strategic location intended for 2,750 new homes, rather than its Plan policy target of 35%. 330 needed affordable homes went begging on supposed economic non-viability grounds. If that shameful situation is to be avoided in Mid Sussex, promoters of all development of 10+ dwellings in Mid Sussex should be expressly required under the terms of the Plan to demonstrate their ability to meet the Plan's affordable home target at an early stage.
- 3.4 **Parish OAN Distribution and Ashdown Forest:** The Parish OAN Distribution "policy on" proposals in Appendix 1 of MSDC 8c do not take into account the potential for development within a zone of influence around Ashdown Forest to be constrained on account of Habitats Regulations compliance, and may need refinement on that account in the light of further work required of MSDC to develop sound, regulatory-compliant, Ashdown Forest related policies.

**Submitted on behalf of the Campaign to Protect Rural England, Sussex Branch CIO – 6 July 2017  
National winner of the Community-led Placemaking Planning Award 2017.**