

Mid Sussex District Plan Examination – Hearings 25 / 26 July 2017

Statement prepared on behalf of LAMBS

The unmet need in the Northern West Sussex HMA is that of Crawley and the Inspector addressed this matter at page 7 of his Interim Conclusions dated 20 February 2017 (ID11). The Inspector noted that Horsham had met 150 dpa of Crawley's unmet need of 335 dpa and that, in the absence of other opportunities or planning authorities to accommodate the remaining unmet need, he decided that Mid Sussex should accommodate the same as Horsham – 150 dpa and that this be added to the OAN figure of 876 dpa. The remaining 35 dpa is to be found in other authorities although the Inspector stated that the opportunities were 'very limited'.

LAMBS consider that little or no consideration was given to the implications of deciding that nearly all the remaining unmet need for Crawley should be provided in Mid Sussex. Reliance was placed upon the fact that Horsham accepted 150 dpa and therefore Mid Sussex should accommodate the same amount. Para 47 of the Framework does urge planning authorities to meet the full objectively assessed needs for housing in the housing market area '*as far as is consistent with the policies set out in the Framework*'. Such policies include a wide range of factors and considerations including infrastructure and environmental impacts. Para 47 provides an important check without which the provision of housing would proceed unconstrained.

It is important to note that the 150 dpa of Crawley's unmet need to be accommodated in Horsham was in the context of that Examination Inspector concluding that a 3% uplift for market signals was appropriate for the Horsham Plan.

In seeking to justify a 20% uplift for market signals for the Mid Sussex District Plan the Inspector referred to the Horsham Plan at page 3 of his Interim Conclusions. He relied heavily on the economic conditions that prevailed during the preparation of that plan in comparison to the improved economic conditions in respect of the period of the preparation of the Mid Sussex Plan.

LAMBS consider strongly that the current economic conditions are volatile at best in view of a number of factors including the Brexit vote and the wholly uncertain economic future for the UK, including Mid Sussex. The outcome of the recent general election has only created more uncertainty. House prices in Sussex have fallen in the last 12 months after a period of growth following the last recession. The Horsham Inspector's description of '*falls in house prices and flat indicators*' as referenced by the Mid Sussex Inspector reflect the prevailing conditions in 2017 and going forward. Accordingly, and in the context of current and likely future economic conditions, LAMBS consider that the 20% market signal figure should be re-assessed and

significantly reduced in response to current economic conditions and be more in line with the Horsham Plan. LAMBS consider the Inspector's inconsistent approach with the Horsham Plan is both striking and disappointing.

The Inspector has sought to increase the housing provision in respect of market signals and to accommodate most of the remaining unmet need from Crawley. Effectively, concluding that as Mid Sussex is the last plan to be prepared in the HMA it must meet the remaining unmet need for Crawley (or most of it) and at the same time provide some 17% more than Horsham's contribution for market signals.

LAMBS consider that there has been no clear evidence to demonstrate that a 20% increase in housing provision has any genuinely positive effect on affordability.

Mid Sussex have presented information (MSDC 15) that they can deliver a five-year supply of housing land to provide 876 dpa for the first five years. Clearly it is essential for any plan to be sound that a five-year housing supply can be demonstrated at the time it is adopted. This figure is by some margin higher than has historically been achieved in Mid Sussex and the Council state that they cannot demonstrate a five-year supply figure with a provision of 1,026 dpa.

LAMBS consider that 876 dpa should be the maximum figure for the reasons provided above. The Council's proposed stepped approach from 876 to 1,026 dpa after the first five years is strongly resisted as this level of housing is not required and LAMBS do not consider that 1,000+ dpa can be delivered. Indeed, if the increased housing provision were not delivered, the Council would yet again find itself without a five year supply and open to ad hoc and unplanned residential proposals. This would be contrary to the plan making process.

Finally, localism and the provision of neighbourhood plans has formed a central part of the overall spatial strategy of the District Plan. Local communities have embraced this and the district has nearly complete coverage of made neighbourhood plans. This positive engagement has been recognised by the Inspector but the proposed increase in housing seriously undermines the confidence of the localism agenda in those communities.

7 July 2017