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### **Q3 Whether the proposed modification to Policy DP5: Housing is sound in respect of the numbers of dwellings attached to settlements.**

Whilst the Council's settlement hierarchy remains the same, the figures behind the revised distribution have been amended, as detailed in MSDC8c. Appendix 1 of this document outlines the Council's proposed methodology which sets out a two tier approach, taking a view on a distribution based on population trends ('Policy Off'), adjusted to consider local constraints and committed development (Policy On'). RPS considers that the Council's approach to the 'policy on' distribution has failed to consider two important elements:

1. Further factors which may constrain the ability of settlement expansion in the District; and
2. The relationship of the Crawley's unmet need to the proposed spatial strategy.

#### **1. Further Constraints**

The assessment has taken the view that the population based evidence should be adjusted to account for a number of factors including parishes with multiple settlements; proposed allocations; settlements in the AONB; and completions/commitments.

Whilst adjusting these projections is a valid approach to take, the Council's approach does not have an appreciation of wider strategic land use constraints that may affect deliverability. As part of the November 2016 submission the response from Thakeham presented evidence supporting Burgess Hill as the most sustainable location for new development, as an area with low level land use constraints. Accordingly, RPS considers that Burgess Hill has the capacity to accommodate further growth without tipping the balance in terms of the effects on local infrastructure or impacts on statutory designations.

#### **2. Unmet Need from Crawley**

The revised distribution strategy from the Council bears no recognition to the fact that a significant proportion of the increase in housing requirement is linked to unmet need arising from Crawley. RPS considers that the plan should make a reasonable allowance for strategic allocations that can make a demonstrable contribution towards Crawley's unmet needs. This approach has already been factored into the Council's Strategic Site Selection Paper (EP23) where the contribution towards meeting unmet need is part of the suitability matrix. As part of this assessment a number of sites were judged to make a positive contribution towards the unmet needs from Crawley on the basis of the size and the location of the site. The Council has identified these two factors as important considerations in planning for the type of sites to meet Crawley's unmet need however this criterion has not been followed through into the Council's revised housing distribution policy. The unmet need has instead been subsumed as part of the overall housing figure in Mid-Sussex and there is no clarity how the plan intends to make provision for Crawley.

### **Need for Additional Growth at Burgess Hill**

For the reasons outlined above, RPS does not consider that the Council has taken an honest appraisal of likely land availability in the District, which fails to consider the deliverability of the growth strategy and does not align Crawley's unmet need with the distributions strategy. In addition to this, RPS considers that there are further failings in the Council's supply of housing land, which point towards further unmet need in the District.

Thakeham is a member of the Mid-Sussex Developer forum, who will be providing a consortium response to strategic matters (raised in ID24) including the Council's Objectively Assessed Need (OAN) and land supply. Separate submissions from the Developer forum have identified

discrepancies with the Council's proposed supply of land, identifying that there is a further 840 dwellings to be found (Appendix 4 of the submission), in addition to the 2,491 to be found elsewhere in the District through Neighbourhood Plans and further Site Allocation Documents (according to the table in DP6 of MSDC8c).

On this basis, there are serious concerns about the Council's strategy to meet the increased growth target and the current proposals give no certainty that this growth will be delivered under the lead of the District Plan. RPS understands that the Inspector does not wish to cover old ground and already has copies of the previous submission made by Thakeham in November 2016 (Ref: 1/20293), which emphasised that there were no compelling reasons for discounting land to the west of Burgess Hill in the Site Selection Paper (EP23) as an appropriate and deliverable location for further growth.

As the sole controller of the land, Thakeham maintain that the Western Arc of Burgess Hill remains a deliverable location for addressing the shortfalls in housing delivery in the District within the plan period which can be integrated into the Northern Arc proposals in the District Plan. To this effect, an updated Delivery Document has been prepared for the site included as an Appendix to this letter, addressing technical considerations raised as part of the Council's Strategic Site Selection paper and a masterplan for the site.

Since this submission was made, it has been clarified that the Council's OAN has indeed increased, along with a requirement for the Council to accommodate some of Crawley's unmet housing need. In line with the Council's own recommendation in the 2016 Site Selection Paper, RPS agrees with the Council that the Western Arc has the potential to make a significant contribution towards the unmet housing need from Crawley, possessing the size and location to respond to the unmet needs from the District.

Notwithstanding the fragility of the housing supply (as evidenced in the representations made by the Mid-Sussex Developer forum), RPS considers that additional flexibility needs to be embedded within the District Plan in order to prevent an early review and secure the primacy of the Development Plan. In order for the plan to be found sound, RPS therefore proposes that additional growth should be directed to Burgess Hill as the most appropriate location for additional housing allocations. Further to this, RPS considers it necessary to commit to a Site Allocations Plan which specifically deals with this need, including strategic allocations at Burgess Hill.

### **Further Changes to Policy DP5 Housing**

In addition to distribution methodology, the Council is proposing further changes to Policy DP5. There is one small though concerning change made by the Council in respect of DP5(2), which changes the emphasis of growth at settlements in the District. Instead of requiring new sites to adjoin built up settlement areas, the revised policy requires sites to be coterminous with them. Relating to development beyond the built out boundaries, this change in emphasis suggests that development will now only be acceptable if it fits in with the existing boundary of the settlement – e.g infilling and would exclude anything which moves away from this, for better or worse.

This builds inflexibility into the policy, which potentially limits the scope of subsequent DPDs or Neighbourhood Plans from bringing forward sustainable developments adjacent to existing settlements. This small but significant change creates an unacceptable emphasis on settlement shape rather than consider all other pertinent landforms and constraints that serve to shape the direction of growth in Mid-Sussex. It is recommended that this modification is removed for the purposes of clarity and soundness.