

Mid Sussex District Council
**Introducing the Mid Sussex
District Plan**
Note TP1



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Key Proposals of the Mid Sussex District Plan

1. The Plan is based on the Vision for the District set out in the 'Mid Sussex Sustainable Communities Strategy' (originally published in 2008 and refreshed in 2012):

“A thriving and attractive District, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future.”

2. The Vision is underpinned by four priority themes that promote the development of sustainable communities:
 - Protecting and enhancing the environment;
 - Promoting economic vitality;
 - Ensuring cohesive and safe communities; and,
 - Supporting healthy lifestyles.
3. Overall the plan seeks to maintain the character, quality of life and economy of Mid Sussex while meeting objectively assessed needs for new housing and contributing to the unmet needs of neighbours through provision of 800 dwellings per annum. It also provides a strategy for establishing and maintaining a robust 5-year supply of housing land, particularly through the delivery of strategic growth at Burgess Hill and Pease Pottage.
4. The Burgess Hill growth represents one of the largest and boldest growth areas proposals in the South East, which has been encouraged by Government and subject to extensive preliminary work to demonstrate its deliverability.
5. The plan also builds on the significant momentum of Neighbourhood plan making which has been firmly grasped by local communities which have made significant progress towards full coverage across the district in advance of the Plan. The Plan also supports the delivery of key Government priorities such as Starter Homes.
6. The approach and contents take full account of relevant government policy and guidance contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), together with the work undertaken by a number of other planning authorities at varying stages of plan making, including from recently adopted plans. In line with requirements for 'soundness' the plan is supported by an evidence base prepared to justify the local plan and based upon a cogent methodology and clearly explained justification for any professional judgements and decisions.
7. This note introduces the main elements of the District Plan. It is supported by a series of appendices providing a more in depth summary of main topics. This note and its appendices also provide full cross references to many of the main evidence reports for the Plan.

1. Introduction

- 1.1 This note explains the main content of the Mid Sussex District Plan and introduces the justification for the approach adopted.
- 1.2 Overall the approach and contents take full account of relevant government policy and guidance contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), together with the work undertaken by a number of other planning authorities at varying stages of plan making, including from recently adopted plans. In line with requirements for 'soundness' the plan is supported by an evidence prepared to justify the local plan and based upon a cogent methodology and clearly explained justification for any professional judgements and decisions.

The Plan Process

- 1.3 Work on the submitted plan (ref. BP1) commenced in June 2014, when the Council agreed a timetable for the preparation of the District Plan.
- 1.4 Consultation on the Consultation Draft District Plan took place between the 21 November and 16 January 2015.
- 1.5 The Proposed Submission District Plan was published for consultation on 12 June 2015 and lasted until 24 July 2015.
- 1.6 Focused Amendments to the Proposed Submission District Plan were published for consultation on 19th November 2015 with a consultation period that was extended to 15 January 2016.
- 1.7 The Plan is supported by a series of main evidence studies, including:
- Sustainability Appraisal (Incorporating Strategic Environmental Assessment) (August 2016) (ref. BP5 – BP6).
 - Habitat Regulations Assessment (October 2015) and Addendum (August 2016) (Ref. BP7 and BP8)
 - Housing and Economic Needs Assessment Update, update and addendum (February 2015, November 2015 and August 2016) (Refs. EP20, EP21, EP22)
 - Mid Sussex Transport Study Final Report (August 2016) (Ref. EP41)
 - Strategic Housing Land Availability Assessment (July 2016) (Ref. EP27)
 - Sustainability Assessment of Cross- Boundary Options for the Mid Sussex District Plan (February 2015) (Ref. EP14)
 - Northern West Sussex Economic Growth Assessment (April 2014) (Ref. EP35)
 - Burgess Hill Employment Sites Study Update (March 2015) (which represents the most recent District level employment land assessment) (Ref. EP36)

Duty to Cooperate

- 1.8 A Duty to Cooperate Framework (ref EP5) has been established to ensure a robust and transparent process to enable cooperation with the relevant local authorities and organisations. In addition, the Framework ensures that the implications of strategic cross-boundary issues on which the relevant authorities need to work together to maximise the effectiveness of their local plans are identified and assessed.
- 1.9 Work undertaken to progress the framework has taken place throughout the District Plan's preparation and is outlined in the Duty to Cooperate Statement (Ref. BP17).

- 1.10 The Duty to Cooperate Framework was endorsed by the Council's Scrutiny Committee for Planning and Economic Development in June 2014 on the basis that it would be kept under review. A review and update of the Framework was endorsed by the same Scrutiny Committee in October 2015.
- 1.11 Commencing in May 2014 and running throughout 2015, numerous officer and Member-level duty to cooperate meetings were held with the following local authorities, as set out in the Duty to Cooperate Framework:
- Adur & Worthing Councils;
 - Arun District Council;
 - Brighton & Hove City Council;
 - Chichester District Council;
 - Crawley Borough Council;
 - East Sussex County Council;
 - Horsham District Council;
 - Lewes District Council;
 - South Downs National Park Authority;
 - Tandridge District Council;
 - Wealden District Council; and
 - West Sussex District Council.
- 1.12 During these meetings, the respective timetables for the preparation of local plan documents were shared and the relevant cross-boundary strategic planning issues and outcomes were discussed and agreed. Further meetings were arranged to discuss emerging evidence base documents.
- 1.13 As the relevant strategic issues developed (such as a revised assessment of Objectively Assessed Housing Need, a new key piece of evidence was published or local plan timetables changed), this triggered the need to inform key neighbours and, where appropriate, for an updated MoU to be signed.
- 1.14 At least one MoU or Position Statement has been signed with all of the local authorities listed above with the exception of East Sussex County Council. Despite working with East Sussex County Council in the lead up to the drafting of a MoU and the Statement of Common Ground, no response has been received to date regarding these, despite repeated attempts to make contact with and arrange further meetings with responsible officers. East Sussex County Council did not make any representations in response to the Pre-Submission Draft District Plan. It is assumed that the County Council has no major concerns with either the proposals in the District Plan or with any cross-boundary strategic planning issues. A number of agreed actions from the process are identified in the Duty to Cooperate statement (Ref. BP17).
- 1.15 Allied to the desire to secure Memorandums of Understanding with neighbouring and nearby local authorities was the Council's intention to invite relevant public bodies to enter into Statements of Common Ground (SoCGs). This resulted in SoCGs being signed with the Environment Agency, Natural England, South East Water Ltd and Thames Water Utilities Ltd. The Council also expects to sign a statement with Highways England in advance of the Examination.
- 1.16 Southern Water, which supplies water to a small area in the south of the district and is the District's main wastewater treatment provider, was also encouraged to enter into a SoCG. However, Southern Water, however, indicated that they did not consider themselves to be a public body to which the duty to cooperate applies.

- 1.17 Mid Sussex District Council has been involved with the preparation of two important evidence studies with its housing market area partners, Crawley Borough Council and Horsham District. These are the Northern West Sussex Economic Growth Assessment, published in 2014 and the Northern West Sussex Housing Market Area - Affordable Housing Needs Model Update.
- 1.18 Due to different timescales and rates of progress with each authority's Local Plan, it was not practical to undertake a Housing Market Area-wide SHMA that identifies the Objectively Assessed Need for all types of housing (both market and affordable) within the HMA. However, ongoing engagement has taken place between the authorities to ensure that their individual assessments of OAN are robust and methodologies are compatible by undertaking a 'benchmarking' exercise. This is further explained in the Northern West Sussex Authorities Position Statement, and ensures that the housing need situation across the HMA is fully understood.
- 1.19 Because of the important issues concerning the capacity of Mid Sussex district to accommodate development, a capacity study, undertaken by Land Use Consultants (LUC) (Ref. EP47) has looked at Primary constraints (i.e. those listed within the NPPF as being of national importance) and Secondary constraints (i.e. those designated at a local level where development may not be precluded but could have negative impacts, especially in combination with other secondary constraints in the same location). It also looked at a number of sustainability considerations in terms of access to existing services.
- 1.20 The study concluded that 92% of the District is covered by primary constraints plus at least one secondary constraint. The area of the District already built-up accounts for 4%, leaving 4% that is not covered by a primary or secondary constraint. The findings of this study were discussed at the Duty to Co-Operate meetings with all nearby authorities in June/ July 2014.
- 1.21 The District Council had the benefit of an informal Planning Inspectorate Advisory Visit in June 2014. During this visit, the Inspector, Mr Simon Emerson, said that those local authorities that were seeking the Council to meet their unmet housing and other needs had an obligation to be clear and helpful about what they were seeking. The Inspector suggested that the Council could write to the authorities concerned to remind them that they had an obligation under the duty to cooperate to provide more detailed information about any unmet needs. The Inspector considered that there needed to be clarity on the scale of unmet needs, the type of needs (i.e. market or affordable housing), the timing (i.e. which part of the Plan period the requirement would fall into) and its location.
- 1.22 Once this information had been obtained, the Inspector indicated that it would be possible for Mid Sussex to test the benefits/dis-benefits of providing this level of growth through the sustainability appraisal (SA) process. The Inspector considered that the SA should give weight to the benefits of meeting the unmet needs of neighbouring/ nearby local authorities as well as considering the potentially negative effects on the environment of Mid Sussex of doing so. The Inspector felt that the Council and other local authorities could consider the weight given to benefits and constraints, including the significance of the locational element and the extent to which the benefits decrease over distance.
- 1.23 Following receipt of this advice, in early August 2014, the Council wrote to the neighbouring authorities of Adur and Worthing, Brighton and Hove, Crawley, Lewes, the South Downs National Park Authority, Tandridge and Wealden to invite them to submit details of any unmet development needs which they would like Mid Sussex to consider accommodating. This invitation was not extended to Horsham District Council as the emerging Horsham District Planning Framework was proposing to meet their housing needs in full, although they were kept informed. All of the above authorities responded to the effect that they were expecting to have housing needs which they would not be able to meet through their own local plans with the exception of the National Park Authority, which was in the early stages of preparing its Local Plan for the whole of the National Park and was not in a position to comment on its housing need.

- 1.24 The Council also commissioned Land Use Consultants to undertake a 'Sustainability Assessment of Cross-Boundary Options' for the District Plan. Neighbouring authorities that were subject to the assessment (Adur & Worthing, Brighton & Hove, Crawley, Lewes, Tandridge and Wealden) were consulted on the consultants' brief, the baseline information, the appraisals and the conclusions, and provided LUC with comments to ensure factual accuracy. All of the local authorities welcomed and supported this piece of work and broadly agreed to its findings.
- 1.25 The overall conclusion of the study was that Mid Sussex District is constrained in its own right, and the greater the amount of development provided by the authority, the greater the likelihood of significant adverse effects arising. In terms of prioritisation, the study considered that it would make more sense to provide for the needs of those neighbouring authorities where the neighbouring authorities had fully explored and assessed their own capacity to accommodate their own needs, where strong economic functional relationships exist, and where there are good public transport links to enable travel by more sustainable modes.
- 1.26 Once the first draft of the Sustainability Assessment had been received from the consultants, the Council sent this to all of the neighbouring authorities featured and arranged meetings with them in December 2014. Many of the authorities' comments received through this process were reflected in the final draft of the study, which was again circulated.
- 1.27 Following feedback from neighbouring authorities Mid Sussex District Council incorporated the findings of the Sustainability of Cross-Boundary Options and information regarding commuting and migration into the Sustainability Appraisal. This presented a fuller picture of environmental and infrastructure capacity, sustainability, and housing supply and the most appropriate housing provision number for the District Plan (including contributions to neighbouring authorities).
- 1.28 The Sustainability Appraisal analysed the sustainability and commuting/migration links between Mid Sussex and each neighbouring authority subject to the Sustainability Assessment of Cross-Boundary Options study. It identified that the strongest functional and economic links were with Crawley and Brighton & Hove, and that any excess between meeting the Mid Sussex OAN and plan provision would be best used to contribute towards meeting unmet need arising from these two areas.
- 1.29 The findings were discussed with the relevant authorities during the Duty to Co-Operate meetings in June 2015.
- 1.30 The Council has also engaged in a number of wider cooperation processes as set out below.
- In October 2014, Mid Sussex District Council joined the Coastal West Sussex and Greater Brighton Strategic Planning Board (CWS&GB SPB), which includes Adur and Worthing Councils, Arun District Council, Chichester District Council, the South Downs National Park Authority, Brighton & Hove City Council, Lewes District Council and Horsham District Council plus West Sussex County Council.
 - Following recommendations for joint working and cooperation, by the Planning Inspector for the Crawley Borough Local 2015 – 2030, Mid Sussex District Council submitted a letter in support of such cooperation.
 - Mid Sussex District Council Cabinet Members and officers have engaged with the Greater London Authority since 2014 on strategic planning issues affecting London and the 'Wider South East'.
 - Officers from the Council attended and integration and implementation session in May 2015 to discuss what marine planning meant for Mid Sussex and the other Gatwick Diamond local authorities, and how the MMO's emerging South Inshore and South Offshore Marine Plans will be put into effect.
- 1.31 In the light of the representations which were received to the publication of the Pre-Submission Draft District Plan in June 2015 and subsequent Inspectors' reports on the examination of

neighbouring authorities' local plans, in late Summer 2015, the Council decided to reconsider its position on its Objectively Assessed Need (OAN) for housing and its housing plan provision figure.

- 1.32 In November 2015, the Council agreed to publish for public consultation a Schedule of Focused Amendments to the Pre-Submission Draft District Plan. These included a revised estimate of the district's OAN from 627dpa to 695dpa, and a proposed increase in housing provision from 650 to 800dpa. The implications of the revisions at the time were that 105dpa, or 1,785 homes over the plan period, would be available to help to meet some of the unmet requirements of neighbouring authorities, particularly Crawley and Brighton & Hove, with whom the functional and economic links were considered strongest.
- 1.33 In addition, the Focused Amendments put forward a new strategic allocation of 600 homes at Pease Pottage predominantly intended in response to the unmet needs of Crawley Borough Council. A Statement of Common Ground is being drawn up with Crawley Borough Council to set out some agreed principles for the development of the Pease Pottage site.
- 1.34 The Council consider that these proposals represent a very positive response to the development needs of neighbouring authorities which would otherwise be unmet through their own local plans.

2. Relationship to the District's Neighbourhood Plans

- 2.1 Mid Sussex has embraced localism and has been an early adopter of Neighbourhood Planning in line with Government Policy. The Council has been keen to show that giving responsibility to local communities to determine what development is needed and where it should go will successfully deliver sustainable growth. Accordingly, when in April 2011 the Council first started work on the preparation of a District Plan, it also encouraged local communities to develop realistic 'bottom up' Neighbourhood Plans in parallel.
- 2.2 Towns and Parish Councils commenced working on Neighbourhood Plans in 2012. The first eighteen Neighbourhood Plan Areas were agreed by Cabinet in July 2012. A further two Neighbourhood Plan Areas were agreed in October 2012 and July 2013 respectively.
- 2.3 A version of the District Plan was submitted for Examination in 2013 but the Examination did not proceed as the Inspector was not satisfied that the Council had met the requirements of the Duty to Cooperate. By 2014, most of Town and Parish Councils in the district that had chosen to take up the opportunity offered by Neighbourhood Planning and the Council was keen to continue this momentum and the progress that was being made in identifying areas for growth. Neighbourhood Plans had harnessed local enthusiasm and were planning positively for growth in line with National Policy. Despite the original assumption that Neighbourhood Plans would follow the District Plans, the scale of this momentum together with case law has established that it was appropriate to allow Neighbourhood Planning to continue and if necessary run ahead of the District Plan. In particular the judgement in the *Gladman* Case of December 2014¹ had concluded that:
- "A Neighbourhood plan may include policies relating to the uses and development of land for housing in its Neighbourhood even in the absence of any development plan document setting out strategic housing policies"*
- 2.4 Work on the District Plan re-commenced in June 2014 with a more robust approach to Duty to Cooperate. Following its assessment through a new Sustainability Appraisal and Strategic Environmental Assessment process, the new plan work carried forward the strategic Burgess Hill growth area proposals, and allowed Neighbourhood Plans to identify other land for housing that

¹ Gladman Developments Ltd, R (on the application of) v Aylesbury Vale District Council & Anor, Court of Appeal - Administrative Court, December 18, 2014, [2014] EWHC 4323 (Admin)

could meet needs and would be similarly tested. The new District Plan also reflects the findings of an updated Strategic Housing Land Availability Assessment exercise. (Ref. EP 27).

- 2.5 A particular concern for the Council was that the character of the District should be maintained and that the infrastructures of existing settlements should not be further and unsustainably overloaded with further incremental growth and poorly serviced accretions. From an early stage there was a Council preference for strategic developments that could offer sufficient critical mass to support appropriate connections, services and facilities. Accordingly, as in the earlier 2011 version of the draft District Plan, and reflecting positive Neighbourhood plan Progress in identifying local sites, it was judged that the plan should focus on strategic sites capable of accommodating at least 500 homes. This decision is justified more fully in the Strategic Sites Paper (Ref.EP23)
- 2.6 As at July 2016, 10 Neighbourhood Plans have been made, 3 will be subject to referendum in September 2016, 4 are at Examination, 1 is at Regulation 14 stage and 2 are at draft stage.

3. Economic Strategy

Economic and Employment forecasts and employment land provision

- 3.1 The most recent assessment of the District's employment land needs was undertaken as part of a Burgess Hill Employment Sites Study in 2015 (Ref. EP36) and a 2014 North West Sussex Growth Study (Ref. EP35). In addition, modelling of the employment needs arising from additional housing growth has been undertaken using the widely used 'Popgroup' model which is summarised in the HEDNA Update and Addendum (Ref. EP 21 and 22)
- 3.2 Based on these forecasts and model output the Mid Sussex District Plan makes provision for approximately an additional 30 hectares of new employment land for high quality business parks as part of the strategic allocation to the north and north-west of Burgess Hill (see Policies DP2: Sustainable Economic Development, DP7: General Principles for Strategic Development at Burgess Hill and DP9: Strategic Allocation to the north and north-west of Burgess Hill). The provision is based on the Burgess Hill study the need for employment development in the district is for 491 new workforce jobs and 25 – 30 hectares of land for employment purposes.
- 3.3 In addition, Policy DP2 supports the principle of the development of a Science and Technology Park to the west of Burgess Hill. An independent study has been commissioned to assess the feasibility and demand for such a development. This facility could provide 100,000m² of employment space, and would meet a sub-regional need, so the pool of labour from which it would draw could be expected to be wider than Mid Sussex district alone.
- 3.4 Underpinning the study are forecasts for Mid Sussex which are for an economic growth rate of 2.1% per annum between 2011 and 2031 (Experian, December 2014). This compares with a forecast economic growth rate of 2.35% per annum for West Sussex for the same period.
- 3.5 Prior to the Burgess Hill study the Northern West Sussex Economic Growth Assessment (EGA), which was produced by Nathaniel Lichfield & Partners (NLP) in April 2014. The EGA developed two potential future economic scenarios to provide a framework for considering economic growth needs in the district. These were a baseline scenario and an alternative higher growth scenario. These scenarios drew on Experian quarterly economic modelling from May 2013.
- 3.6 The baseline scenario predicts that 10,425 additional jobs will be created in Mid Sussex between 2011 and 2031, equivalent to 521 jobs per year on a workforce basis. This translated into a requirement for 148,250m² or 30.7 hectares of B use class employment space (i.e. offices, industrial and warehousing). The majority of this would be needed for the Class B1(a), B2 and B8 uses. This pattern of use is compatible with the land provision made.
- 3.7 NLP also modelled an alternative higher growth scenario for Mid Sussex which explored the potential for enhanced higher-value economic growth within a number of key growth sectors

identified by the Gatwick Diamond and Coast to Capital Local Enterprise Partnership (LEP). It also took account of planned investment or intelligence about future sector/site potential and provided an indication of additional growth capacity over and above the baseline scenario. Under this alternative scenario, a total of 13,425 jobs would be generated in Mid Sussex between 2011 and 2031, equivalent to 671 jobs annually on a workforce basis. This would require the provision of 242,080m² of employment floorspace or 52.8 hectares of employment land.

- 3.8 The EGA emphasised that although these forecasts were widely recognised as a valuable input and can indicate the broad scale and direction of economic growth in different sectors to help assess future employment space requirements, they tend to be most reliable at national and regional scales and consequently less so at the local economy level. The EGA also acknowledges that both the baseline and the alternative scenarios of employment growth within Northern West Sussex exceed the levels of growth recorded within the sub-region in recent years (1997-2013). The EGA comments that the contrast is particularly stark with regards to Mid Sussex, with the 2013 baseline forecast implying a shift from moderate job losses over the last 16 years to relatively significant job gains over the next 20 years. Because of this, the EGA explains that planning to meet the employment and spatial implications associated with the minimum baseline scenario would in itself constitute positive planning for growth.
- 3.9 Whilst the Council accepted the findings of the EGA in general, it considered that its forecasts for employment generation should be treated with caution. Concerns were raised about the underlying workforce figures that were fed into the forecasts. For example, it appears that the increase in the state retirement age was the sole reason for the implied 9% increase in the working age population. In addition, the figure in the EGA of 62,155 for the total number of existing jobs in 2013 implied an unrealistic recovery from the 52,000 jobs in 2010 which had previously been identified in the Northern West Sussex Part II Employment Land Review.
- 3.10 The lack of realism of the Experian-derived projections in the EGA is highlighted by Figure 1 below which illustrates that the job growth of the two modelled scenarios would be far in excess of the actual annual average growth in jobs over the previous 16 years.
- 3.11 The Planning Inspector who examined the Horsham District Planning Framework had similar misgivings about the forecasts in the EGA. In his report of 8th October 2015, the Inspector commented:
- “In the context of my Initial Findings regarding housing provision, I expressed a note of caution about the forecasts, in the light of evidence about the local economy. I understand that the methodology used in the forecasting involved the analysis and breakdown of the local economy into a number of sectors, to which projected national growth rates were applied. This may not provide a particularly accurate prediction of future growth in a changing employment environment locally. There are indications of such change in Horsham, particularly in the market for large scale offices, although the district’s role as a key part of the ‘Gatwick Diamond’ is not likely to diminish, and could be altered considerably depending on the outcome of the decision on the third London runway.*
- “The baseline scenario of 445 jobs pa also represents a large increase on historic job growth between 1997 and 2013 of 273 jobs pa. An update to this figure submitted at the resumed hearing suggested a higher annual rate of 340 jobs pa but even so the EGA scenarios indicate a very significant uplift in historic job growth performance. As the EGA acknowledges the projected increase in total B class jobs could be regarded as optimistic based on past performance.” [IR 18 & 19]*
- 3.12 In the case of Mid Sussex’s other housing market partner, Crawley, the local plan Inspector accepted that, because of the severe constraints on the availability of developable land in Crawley, there would be a shortfall in the order of 35 hectares of employment land and noted that “... analysis of the data does not provide unequivocal support for either the baseline or the higher growth scenarios [in the EGA].” (IR 72)

Balancing Homes and Jobs

- 3.13 Modelling has been undertaken using the POPGROUP software to assess the employment needs arising from increased household/housing growth.
- 3.14 POPGROUP is a suite of demographic software developed to generate population, household, labour force and other derived projections for specified geographical areas and/or population groups. Forecasts can be made using a variety of data inputs and assumptions. Current populations can be estimated and future populations forecast, with detailed age and sex composition.
- 3.15 POPGROUP may be regarded as a UK standard for local area demographic analysis and forecasting, complementing the approaches used by the UK Office for National Statistics (ONS).
- 3.16 Within Mid Sussex, the POPGROUP modelling software has used the background data (predominantly population projections by age) to convert the projected number of households to a projected workforce, and then to jobs. This has been done by assessing the population profile of the District, determining the number of residents of working age, and then using economic activity and commuting ratios to predict how many jobs this equates to.
- 3.17 The job projections based on the new population and household projections, and using new data regarding economic activity suggest that provision of 800 dpa, will result in jobs growth of a requirement for 370 jobs per annum. Given that the employment forecasts used to identify employment land requirements were undertaken on an 'unconstrained basis', it is assumed that this jobs growth is already accounted for in employment land provision in the District Plan.

4. Housing Strategy

Housing provision

- 4.1 In line with paragraph 158 of the NPPF the Mid Sussex Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 4.2 Specifically it has taken into account successive releases of DCLG household projections including the most recent 2014-based CLG Household Projections (released 12 July 2016) and undertaken a SHMA and subsequently a HEDNA which have been updated as new evidence has become available. (see supporting Refs. EP20, EP21 and EP22)
- 4.3 The proposed housing provision for the plan of 800 dwellings per annum (dpa) which is met by the Plan can be compared with DCLG household projections, published in July 2016 suggesting household growth and a potential objectively assessed needs estimate of 754 dwellings per annum.
- 4.4 The provision of 800dpa takes account of vacancy and market signals. It also allows for a contribution to neighbouring districts established through cooperation with the neighbouring authorities throughout the plan making process and takes account of the July 2012 household projections. A detailed analysis of the implications of the latest projections is set out in the HEDNA addendum of August 2016.
- 4.5 The 800 dwellings per annum requirement figure was initially set in November 2015 in response to CLG 2012-based household projections which were issued in February 2015. The CLG projections suggested household growth of 656 dwellings per annum. This base figure was adjusted to take account of market signals and vacancies which resulted in a Mid Sussex requirement as Objectively Assessed Need of 695 dpa. Provision was made for an additional 105 dpa to allow for the unmet needs of neighbouring authorities.

- 4.6 In taking account of the 2014-based projections, the Council has considered that the most recent projections suggests that the potential effect has been to reduce the contribution to neighbours from 105 dpa to 46 dpa. Accordingly, it has also given consideration to the case to increase the overall provision to match this latest increase. On balance, it has concluded that there is no clear case for an adjustment at this stage, for the following reasons:
- The 800 dpa provision marks a significant boost to housing supply in line with paragraph 47 of the NPPF. Historically the build rate experienced is an average of 525 dwellings per year (average over last 11 years) although the picture is improving with an average of 661 units over the past 5 years.
 - Provision in excess of 800 dpa exceeds the supply of suitable and deliverable sites identified through the SHLAA process.
 - Provision in excess of 800 dpa marks a 'tipping point' in terms of moving from a sustainable to an unsustainable development strategy, as explained below.
- 4.7 In addition, in our view the latest DCLG household projections can be seen as reflecting the somewhat periodic and probable long term cyclical fluctuation in household growth which has varied over the preparation of the plan (and the first half of a cycle) from 570 dpa in 2008/2011 to 656 dpa in 2015 to a projection representing a possible peak of 714 dpa in 2016. The 754 OAN figure (714 plus vacancies and market signals) is thus likely to represent a peak requirement, rather than a long term average, which takes into account increases in migration trends over the past five years (in particular, internal migration). The period to 2014 marked a period of unprecedented migration which, over the medium to longer term, Government policy now set objectives to reduce. By using the first half of the cycle for extrapolation, the balance of probabilities, would suggest projections which may overstate the likely long term requirement.
- 4.8 Analysis also suggests a positive correlation between the level of housing completions and DCLG projections, reflecting the use of a methodology by DCLG that relies on the extrapolation of immediately preceding periods. The increases in the number of housing completions results in population increases which get extrapolated into future projections. This is significant because of the wider context of Mid Sussex in which many authorities have failed to find sufficient capacity to meet their housing needs. The potential effect may thus be to 'internalise' a trend of Mid Sussex meeting other area's housing needs and to progressively 'ratchet up' identified needs for Mid Sussex. This may be undesirable and unsustainable if it fuels longer distance commuting, and higher house prices, in areas that are underproviding for their needs. The most recent projections have been discussed with neighbouring authorities in this context.
- 4.9 A fuller analysis of the Projections is included in the HEDNA and HEDNA Updates (Document Refs. EP 20 – EP32, and in Summary Notes SN1 and SN2). The main results of the SHLAA, Site Selection and 'Tipping Point' analysis are summarised below.

Affordable Housing Provision

- 4.10 Recent assessments unsurprisingly highlight a continuing high level of affordable housing requirement needed in each local authority area within the Northern West Sussex Housing Market Area, including Mid Sussex. (Refs. EP24, EP25, EP26 & EP30). The Plan generally sets a headline requirement for 40% affordable housing, split between traditional affordable and starter homes. This level of provision aims to meet the affordable housing needs of Mid Sussex in line with national planning policy. The most recent Studies have found that an increase to an overall provision of 40% affordable housing (half starter homes and half other forms of affordable housing) would meet the needs of all those in reasonable preference groups and would at the same time meet a significant amount of the total waiting list (64%).

- 4.11 This provision marks an increase from 30% in the previous plan and is also supported by the increasing viability of starter homes relative to traditional affordable housing provision. It is also supported by the Plan's viability study findings (Ref. EP43)
- 4.12 For the provision of affordable housing other than starter home units, a mix of tenure will be required (normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes, unless the best available evidence supports a different mix).
- 4.13 The evidence underpinning the understanding of housing needs in Mid Sussex starts from an update to the affordable housing needs assessment model undertaken in 2014 jointly with Crawley Borough and Horsham District Councils for the Northern West Sussex Housing Market Area– the Northern West Sussex Housing Market Area – Affordable Housing Needs Model Update (2014 AHNM) (Ref. EP26)
- 4.14 The 2014 AHNM built upon previous studies of housing need undertaken for the Northern West Sussex Housing Market Area in 2009² and 2012³, and demonstrates *inter alia* the amount of affordable housing that will be necessary to meet housing needs at the local level in Northern West Sussex. The 2014 AHNM was based on the ability to meet current and future affordable housing need through existing and committed future affordable housing stock.
- 4.15 The Affordable Housing Needs model presented four affordable housing needs scenarios. The scenarios consider the affordable housing needs arising from those groups that local authorities are required to give “reasonable preference” to (the ‘low estimate’), and the entire local authority housing waiting list (the ‘high estimate’).
- 4.16 Reasonable preference groups include those households that are homeless and in priority need, those occupying unsanitary or overcrowded housing, and people who need to move on medical or welfare grounds. The total waiting list represents all those on the Housing Register and also includes other households who cannot afford to rent or buy property without assistance and may therefore be living with parents and unable to set up their own home.
- 4.17 The affordable housing needs model was further updated in the Housing and Economic Development Needs Assessment (November 2015) (ref. EP20) to account for a subsequent review of the housing register; an upward adjustment to the CLG Household Projections data; and a significant change in the committed supply of affordable housing. The model calculated that a plan provision of 800 dwellings per annum would generate a net annual housing need of 191 (‘low estimate’) to 294 (‘high estimate’) households.
- 4.18 The HEDNA (November 2015) (ref. EP20) indicated that a plan provision of 30% affordable housing provision would meet the needs of all those in reasonable preference groups with around 82% of the total waiting list met. The Mid Sussex Whole Plan and Community Infrastructure Levy Viability Assessment (2015) demonstrated that the provision of 30% affordable housing did not unduly impact upon the viability of development generally across the area, taking into account the requirements of other policies in the development plan, and there was sufficient headroom for the charging of Community Infrastructure Levy. However, neither of these evidence documents accounted for the impact of starter homes.
- 4.19 Accordingly, the level of overall affordable housing provision was reviewed further to take into account the impact of providing starter homes units as part of the package of affordable housing provision. The MSDC Starter Homes Study (March 2016 and April 2016) considered the potential effects of delivering starter homes on the supply of other forms of affordable housing (also termed

² Northern West Sussex Strategic Housing Market Assessment – May 2009

³ Northern West Sussex – Mid Sussex Strategic Housing Market Assessment Update - October 2012

'traditional' affordable housing⁴), reflecting the proposed requirements set out in the Starter Homes Regulations – Technical Consultation (March 2016).

- 4.20 The Starter Homes Study assumed that the delivery of the requisite proportion of starter homes is a priority as the Government intends, and assesses the effects of this provision by applying a 20% starter homes requirement alongside various levels of traditional affordable housing contribution. The Study is based upon the housing need measured in the HEDNA (November 2015) of between 191 – 294 dwellings per annum.
- 4.21 The HEDNA need considers not only those on the housing register, but those unable to buy or rent privately without assistance. The Study finds that starter homes could potentially contribute to meeting the needs identified in the HEDNA to the order of 44 to 51 households per annum based on households with an income able to support a mortgage of between £181,440 and £250,000. These are households that are able to purchase starter homes, but are unable to afford to purchase housing on the open market.
- 4.22 The Starter Home Study demonstrates that maintaining 30% overall provision of affordable housing (amounting to 2/3 starter homes and 1/3 other forms of affordable housing) would meet 57% of the needs of those in reasonable preference groups and 32% of the needs of those on the waiting list for affordable housing. The Study concludes that a 30% contribution would be insufficient to ensure that other forms of affordable housing (affordable rent and intermediate tenures) can be supplied to meet the HEDNAs modelled range of housing needs and that a raised policy contribution would be necessary to more closely meet the identified affordable housing needs in full.
- 4.23 The latest Community Infrastructure Levy and District Plan Viability Study (2016) (Ref: EP43) generally indicates that the District Plan target of 40% affordable housing provision, including the forthcoming requirement for Starter Homes, can be viably delivered and that there is also likely to be sufficient headroom on the majority of sites for the charging of a Community Infrastructure Levy at a rate that the rates adopted could be balanced in terms of delivering the affordable housing and infrastructure needed to support sustainable development on those sites.

Translating Housing Provision into a Delivery Trajectory

- 4.24 A significant amount of work has been undertaken to understand the housing capacity of Mid Sussex and to establish the 'tipping point' of the optimal level of sustainable housing provision for the District Plan.
- 4.25 The Council's Strategic Housing Land Availability Assessment (SHLAA) identified a number of sites that could potentially be allocated and contribute towards meeting the housing provision number. The results of the SHLAA are summarised in the table below. It identifies a total housing potential of 12,596 dwellings for the period to 2031, from all sources of available land.

⁴ Affordable rent and intermediate tenures

Strategic Housing Land Availability Assessment

Source of Supply	Deliverable (Years 1-5)	Developable (Years 6-10)	Developable (Years 11+)	Total Supply
Commitments (Within the Planning Process)	3,959	919	412	5,290
Site Not Currently in the Planning Process	239	1,413	1,554	3,206
District Plan Allocations (pending) at Burgess Hill	515	1,680	1,305	3,500
District Plan Allocations (pending) at Pease Pottage	150	250	200	600
Total Housing Potential	4,863	4,262	3,471	12,596

The Housing Trajectory

- 4.26 Drawing on the SHLAA, the District Plan housing policy (DP5) identifies a number of sources for housing supply:
- Commitments – sites that are already allocated or with extant planning permission.
 - Strategic Sites – sites strategic in scale, that is greater than 500 dwellings to be allocated within the District Plan itself.
 - Windfall – smaller, unplanned sites that have unexpectedly become available for development for which an allowance is made.
 - Neighbourhood Plans – sites of less than 500 dwellings identified and allocated through Neighbourhood plans being prepared by the town/parish councils within the District.
 - Site Allocations DPD – sites to be identified within the forthcoming Site Allocations DPD due for adoption in 2021.
- 4.27 The Housing Implementation Strategy (ref. BP 18) for Mid Sussex sets out the Council's approach to managing the delivery of new housing in the District to 2031. It is accompanied by appendices which give a more detailed breakdown of provision.
- 4.28 The Submission Plan sets a target of 13,600 homes between 2014 and 2031, at an average of 800 homes per annum. The table below sets out how these dwellings will be accommodated and sets out the housing position as at 1st April 2016.

Breakdown of District's housing supply over the Plan period

Total housing requirement (2014 – 2031)	13,600
Supply	
Completions 2014/15	630
Completions 2015/16	868
Existing Commitments	
Which is made up from :	
Large allocated sites without planning permission	372
Neighbourhood Plan allocations without planning permission	319
Larger sites with planning permission (outstanding units on sites of 6 or more)	4,282
Small sites with planning permission (less than 6 discounted by 40%)	317
Total Existing Commitments	5,290
Strategic development north and north-west of Burgess Hill (Policy DP9)	3,500
Strategic development at Pease Pottage (Policy DP9a)	600
Potential windfalls on site under 6 units ⁵	450
SHLAA sites (identified as deliverable within years 1 – 5)	239
Residual amount to be delivered through future Neighbourhood Plans and a Site Allocations Document (prepared by the District Council)	2,023

- 4.29 As the table above shows the majority of housing need is currently met by strategic sites allocated in the District Plan at Burgess Hill and Pease Pottage, together with larger sites with Planning Permission.
- 4.30 The Neighbourhood Plans have been given the first opportunity to allocate non-strategic sites within their areas to meet their needs and community aspirations. At July 2016 adopted and emerging Neighbourhood Plans allocate land for approximately 2008 – 2022 dwellings, the majority of which have existing planning permissions. This is reflected in the 319 homes without planning permission but in Neighbourhood plans in the Table above.
- 4.31 This approach reflects the Government's localism agenda, and its view that giving power and responsibility to local communities will give them the confidence to accept appropriate development and the corresponding benefits that can come with it. This view is confirmed in the National Planning Policy Framework (NPPF) (paragraph 16), which sets out that Neighbourhoods should *"develop plans that support the strategic development set out in Local Plans... and plan positively to support local development"*.
- 4.32 Once all the Neighbourhood Plans have been adopted there is likely to be a residual amount that will need to be allocated through a Site Allocations Document. As set out in in the Table above, there is a residual amount of 2,023 units to be planned for through Neighbourhood Plans or the Site Allocations Document. This reduces to 523 if account is taken of the number of units in the 'pipeline' through Neighbourhood Plans. The SHLAA identifies a total palette of suitable, available and achievable sites that could deliver 3,206 housing units (sites not currently in the planning process) with the majority of these sites identified as available after 2021. It is these sites that

⁵ See Windfall study, ref. EP28

would be looked at first during the preparation of the Site Allocations Document, if they are available and deliverable. This demonstrates that there are sufficient potential housing sites to meet the longer term housing requirement in the District Plan.

- 4.33 There is a greater level of risk associated with those sites that are allocated but are without planning permission. This accounts for 691 dwellings within a total commitment of 5,290. An assessment has been made on the likelihood of these allocations coming forward for development. Those that have been identified, through the Strategic Housing Land Availability Assessment, as having low likelihood of development have not been included as a commitment. The delivery of these allocations has also been phased over the plan period based on the likely timing of future development.
- 4.34 The extant permissions on small sites could deliver 515 dwellings (gross). A discount of 40% has been made to allow for non-delivery of some sites. Therefore 318 dwellings (net) from this source have been included within the commitment figure. No allowance has been made for non-delivery of larger sites as there is a good delivery record from these sites. Overall, the risk of non-delivery of large sites with planning permission is low. Judgements have been made on when it is anticipated that large sites may come forward for development with the trajectory. It is acknowledged that potential barriers to development may arise. The District Council has a history of working with developers to overcome such barriers to development and this will continue.

The 5 year Housing Land Supply position

- 4.35 The housing trajectory set out in the Housing Implementation Strategy (Ref. BP18) shows the five year supply position and a 20% buffer against the District Plan requirement of approximately 800 per annum.
- 4.36 Within the first five years of the Plan a total of 4,875 units will be delivered. This represents 36% of the total supply over the Plan period and therefore supply is higher in the first five years compared to years 6+ onwards.
- 4.37 The five year supply period covers the period 2016/17 – 2020/21. Using the ‘Liverpool method’, the current five year requirement for the District is 4,034. With the 20% buffer applied this figure rises to 4,841. The District has a five year supply of 4,863 dwellings, which equates to a surplus of 22 dwellings or equivalent to 5.02 years supply.
- 4.38 The local circumstances in Mid Sussex justify the use of the Liverpool residual method for calculating the five year housing land supply and address any shortfall against the housing requirement, for the reasons which include those set out below.
- Over the past 5 years the average completions rate is 661 dpa. A housing requirement of an average of 800 per year will be a very challenging target for the authority to meet. The target will serve to boost significantly the supply of housing in Mid Sussex, as required by the NPPF (paragraph 6) as the target is above the level of housing that has been historically provided.
 - Around 25% of the total supply over the plan period will come from the strategic allocation at north Burgess Hill. This site will deliver completions within the first five years (515 units), although the largest proportion will be delivered in year 6 -10 (1,680) with a slightly smaller amount in years 11+ (1,305). The lead times to bring this site forward in terms of infrastructure and a limited number of house builders delivering this site means that it is not realistic to assume that a larger amount will come forward in the first 5 years.
 - Whilst the Pease Pottage allocation will also deliver completions within the first five years (150), In the Council’s judgement it may take most of the plan period to bring forward if, as seems likely there is only one developer on the site. Nevertheless, it should be noted that the developer has suggested that faster delivery may be possible.

- Excellent progress is being made on the preparation of Neighbourhood Plans. A number of the Parishes have stated in their made Plans that they would like the delivery of allocated sites over the whole plan period rather than just within the early years. This means that completions from adopted Neighbourhood Plans will also be spread over the plan period rather than frontloaded in the first 5 years.

4.39 Overall, the District Plan's development strategy relies upon the delivery of two large strategic developments. Whilst this approach is beneficial in terms of matters such as coordinated infrastructure delivery and meeting local needs, it does mean that longer lead-in times and regular delivery rates per annum over a number of years are inevitable.

5 Year Supply

		Notes
Requirement		
District Plan housing requirement 2015 - 2020	4,034	Based on residual amount of 12,102 divided over 15 years remaining of the Plan.
Annualised housing requirement with 20% buffer applied (years 1 -5 only)	4,841	4,034 x 20%
Supply		
Commitments		
Large sites where development has commenced	1,573	Residual amount
Large sites with Planning permission where development has yet to commence	1,870	
Large allocated sites without planning permission	199	
Sites identified in the SHLAA	239	
Small sites with planning permission (with 40% discount applied)	317	
District Plan allocation at Burgess Hill	515	
District Plan allocation at Pease Pottage	150	Planning application pending decision
Total Housing Supply in year 1 – 5	4,863	
Five year supply	5.02	Total supply/Total requirement x 5
Surplus over period	22	

Approach to District Plan allocations

- 4.40 The District Plan strategy has been to allocate strategic sites, rather than a range of smaller sites. For the purposes of the District Plan, a strategic site has been defined as a site of 500+ units. This is because of concerns about the further overloading of infrastructures for the character of existing settlements, and because of the scope for sites of 500 units to support often much-needed new infrastructures in terms new education/ health/ retail/ community facilities on site, reflecting both the availability of finance and land. Larger strategic developments are also judged to offer the best prospects for meeting housing need, the needs of occupiers and general concerns for delivering housing which is can be accessed by those with existing local needs.
- 4.41 A range of smaller sites totalling the same number units would increase need for facilities in various locations across the District without providing a sufficiently robust mechanism for providing the new facilities to meet this need and typically also without being able to provide the land. The resulting scale of change to existing settlements would also be incompatible with Strategic Objective 2 of the District Plan to ensure development reflects the District's distinctive towns and villages and retains their separate identity and character. Typically, Mid Sussex's settlements are small or medium sized and their character would be unlikely to be sustained by significant and further incremental growth. Accordingly, the strategy has also been to identify appropriate levels of future growth in existing settlements through Neighbourhood Plans, in the first instance.
- 4.42 Recent developments and proposals of new housing in the smaller settlements, (often as extensions beyond existing boundaries defined in Neighbourhood Plans and justified on a lack of 5-year housing supply in advance of the District Plan) are tending to deliver housing supply at prices that restricts access to those with existing need, relative to the supply that may be offered on identified larger strategic sites.
- 4.43 In the context of the District Plan, a site of 500 units has been considered a sufficient size to meet local needs, trigger the need for additional services (at a strategic level) and contribute towards meeting demands across the Housing Market Area. This is because:
- A yield of 500 units was a level considered 'strategic' for broad locations assessed in other Northern West Sussex authority SHLAAs (both the Crawley and Horsham SHLAAs jointly assess sites over 500 units as 'strategic').
 - Growth of this scale is large in context with existing settlements within the District (Strategic Objective 2 of the District Plan is to ensure development reflects the District's distinctive towns and villages and retains their separate identity and character)
 - A site of this size is likely (in viability terms) to be able to fund and provide new infrastructure (e.g. education, health, retail, employment) on-site to meet increased demand for additional services.
 - A site of this size would be capable of meeting localised/District housing needs as well as housing need from neighbouring authorities.
 - A site of this size would be capable of meeting localised/District housing needs as well as housing need from neighbouring authorities;
 - A site of this size is likely to trigger the need for additional services at a strategic level; and
 - A site of this size is likely (in viability terms) to be able to fund and provide new infrastructure (e.g. education, health, retail, employment) on-site to meet increased demand for additional services than a series of smaller sites.
- 4.44 The NPPF also states that Local Planning Authorities should “identify key sites which are critical to the delivery of the housing strategy over the plan period” (NPPF, para 47). The key sites which are critical for the District Plan are the large, strategic sites. As per the Plan Strategy, smaller sites

have been allocated within the 'made' Neighbourhood Plans, or will be allocated in forthcoming Neighbourhood Plans or the Site Allocations DPD.

- 4.45 The SHLAA identified a number of sites that have potential to deliver 500+ units. These formed the basis for a strategic sites options appraisal, which is reported in full in the Strategic Sites Selection Paper (ref. EP23). Some of these sites were assessed as unsuitable for development, and were therefore discounted from the appraisal process as they were not considered a reasonable alternative.
- 4.46 Since the original Sustainability Appraisal was published in November 2014, a number of the possible sites have been re-submitted to the SHLAA, re-submitted during consultation periods on the District Plan, or have been significantly progressed in terms of pre-application advice and/or a planning application has been submitted. In some instances, this has shown that the developable yield is now significantly less than 500 dwellings. These would be more appropriately delivered through Neighbourhood Plans or the planned future Site Allocations DPD (or alternatively are already progressing through the planning application or appeal process) rather than the strategic level District Plan for the reasons stated above.
- 4.47 The assessment has used a similar methodological approach to the Sustainability Appraisal – each site has been assessed against a number of criteria – 15 in total. The impact on each criterion was graded on a 5 point scale. For the detail see the Strategic Sites Selection Paper (ref. EP23).
- The Burgess Hill allocation scored very positively. This site has the significant benefit in that it is actively promoted, well progressed (applications are due imminently) and could deliver a reasonable supply of housing in the short term to help meet needs.
 - Pease Pottage ranked the highest of the other site options, despite being located in the AONB. This is despite more weight put on its impact on the AONB, and the exceptional circumstances that should be met before it is deemed appropriate for allocation.

Establishing the 'Tipping Point'

- 4.48 Analysis set out in summary note SN1 sets out that a 'Tipping Point' between sustainable and unsustainable housing provision, exists at a housing provision of 800 dpa and this has been a factor supporting the housing provision in the plan.
- 4.49 As housing provision increases, positive benefits increase in terms of providing homes within Mid Sussex to meet the District's need, and unmet need from other authorities. However, negative impacts also get worse as the housing number increases, particularly on environmental objectives. The point where negative impacts are greater than the positive impacts is known as the 'tipping point'.
- 4.50 In conducting the assessment, the Council has had regard to the advice in paragraph 14 of the NPPF, and examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits; in the context of Mid Sussex it is also highly relevant that a considerable proportion of the District is designated AONB; that is a designation which in terms of the NPPF indicates that development should be restricted.
- 4.51 In order to form a balanced and holistic view, therefore, the Council has assessed the sustainability of the various Options (identified in terms of net new housing completions per annum) in various ways:
- By assessing the options against the full range of sustainability criteria, making judgements about the degree to which those criteria would or would not be met
 - By examining as a sub-set of that exercise the areas in which the various options most clearly diverged

- By making a judgment about the overall effect of the various options bearing in mind what the Council consider to be the key criteria for this policy: housing provision, economic growth, and environmental protection (principally landscape resource conservation). This is an important exercise because some of the criteria are incommensurable, and a tight focus on those that particularly matter to the overall sustainability of the plan has been thought to be helpful in judging between the different alternatives. It is also important to recognise that, where housing delivery is concerned, for instance, there are real constraints in the availability and deliverability of sites, such that the options involving higher housing numbers are to some extent theoretical rather than real.

- 4.52 The full criteria assessment gives an indication that the benefits peak at around 800 dwellings per annum (dpa), and thereafter begins to fall away. However, the adverse impacts steadily mount and increase markedly between 800 and 850 dpa options.
- 4.53 For these reasons, in the light of the criteria, the “key criteria”, deliverability issues, and the tests in the NPPF relating to sustainable development, the Council has judged that making provision for 800 dpa (Option C) is the preferred option.
- 4.54 Delivering 800 units a year will still involve substantial green field development, and incursion into the AONB, and some adverse effects are therefore quite clear. However, they do not extend to the point where they significantly and demonstrably outweigh the benefits of the Option, and therefore, bearing AONB in particular in mind, the 800 dpa option (Option C) therefore best fits with overall sustainability objectives.
- 4.55 Provision below 800 dpa may protect the AONB and other aspects of the environment but provides too little by way of benefits and results in provision that does not both meet objectively assessed need and contribute to under provision beyond the district.
- 4.56 Options above 800dpa provide greater benefits, but the assessment suggests that they plateau quite soon, and come at a very greatly increased environmental cost as well as being practically undeliverable. Those options lie on the wrong side of the tests for sustainable development in the NPPF and have therefore been rejected.

Infrastructure and Delivery of Strategic Sites

- 4.57 An Infrastructure Delivery Plan (IDP) 2016 (document ref. EP 42) has been prepared to support the District Plan and the future implementation of the Community Infrastructure Levy for Mid Sussex. The IDP document supports the objectives outlined in the emerging District Plan and provides detail on strict needs and other desirable infrastructure within the District to support new development. The District Plan sets out that necessary social, physical and green infrastructure will be sought to ensure sustainable communities are created. The IDP identifies the infrastructure requirements for the District, and where possible indicates how these requirements will be funded. It will also play an important role in the preparation and adoption of a Community Infrastructure Levy (CIL) Charging Schedule for Mid Sussex.
- 4.58 The IDP also considers if an infrastructure scheme is essential to support the District Plan, or to support growth allocations in neighbourhood plans, or forms part of other desirable community improvements.
- 4.59 As summarised in Summary Note (ref. SN 4), the District Council is working closely with the development consortium for the strategic allocation to the north and northwest of Burgess Hill to ensure development is brought forward in a timely manner to maintain a continuous supply of land for housing in the district. The District Council has appointed a senior officer who has responsibility for working closely with the consortium on both the policy and development management sides of the planning process. The Council has also appointed a number of other specialists to assist in bringing the Northern Arc forward in a timely manner. Master planning work is already well underway on the strategic development and the District Council, the consortium and other

stakeholders are positively engaged in discussions on infrastructure delivery and transport provision. The District Council has secured £17 million in Local Growth Fund support for improvements to the A2300 and is working closely and positively with the Homes and Communities Agency, Coast to Capital Local Enterprise Partnership and other partners to progress the development.

- 4.60 Planning permission has been granted for 480 new homes at Kings Way on the eastern side of Burgess Hill. A reserved matters application for phase 1 of the scheme was approved in February 2015. This was for 78 units and work has commenced on site with the first completions expected towards the end of 2016. The reserved matters application for Phase 2 was submitted in May 2016.
- 4.61 Overall, the growth planned for and already being delivered at Burgess Hill fulfils the Strategic Economic Plan (SEP) objectives and many of the Government's policy priorities. The package of growth enjoys strong political support from all three tiers of local government, the local MP, the HCA and Cabinet Office Delivery Team. It comprises:
- 5,000 new homes;
 - 13,600 jobs (incl. construction);
 - a science and technology park;
 - estimated GVA of £283m;
 - a significant town centre regeneration;
 - up to 100,000 sq.m of new employment space; and
 - improved transport and infrastructure, including digital
- 4.62 The SEP specifically identifies Burgess Hill as a strategic growth location and states that the significant developments proposed will only go ahead if there are transport and other infrastructure improvements. The current bid focuses on these specific issues:
- Holistic, integrated modern transport solution to link the all the developments within the growth area to the existing town to facilitate sustainable growth - £18.99m;
 - Improving substandard infrastructure to remove barriers to housing delivery - £4m;
 - The access for the Science and Technology Park site from the A2300 - £1.65m; and
 - The delivery of a new spine road that links the bulk of the new housing (3500 homes) to the existing town and transport network securing a coherent build out and ensuring pace and certainty to the delivery of the housing (and associated economic activity). - £9m loan.
- 4.63 The entire Burgess Hill programme represents a total investment of nearly £1bn. The programme also aims to contribute to the Government's priority policy of Starter Homes with 553 units planned in Burgess Hill.
- 4.64 Housing delivery is underway with the first 1000 homes being built out and occupied this summer, a further 325 are permitted and legal agreements and planning permissions are in place for the town centre redevelopment.

5. Habitats Regulation Assessment and the Ashdown Forest

- 5.1 Ashdown Forest lies adjacent to the north-east boundary of Mid Sussex and within Wealden District. The Ashdown Forest Special Protection Area (SPA) is classified because of the presence of breeding populations of Dartford warbler and European nightjar. The Ashdown Forest Special Area of Conservation (SAC) is designated because of the heathland habitats.
- 5.2 The potential effects of development on Ashdown Forest were assessed during the Habitats Regulations Assessment (HRA) (Refs. BP7 & BP8) process for the Mid Sussex District Plan⁶. The screening process undertaken in late 2007 and early 2008 identified likely significant effects on the Ashdown Forest SPA and SAC as a result of recreational disturbance and atmospheric pollution respectively.
- 5.3 The District Plan HRA advises that measures are required to mitigate any potential recreational disturbance impact and District Plan Policy DP15 implements these recommendations. Natural England supports this policy.
- 5.4 The requirement for new residential development proposing a net increase in dwellings to provide mitigation is based on a zonal approach. The District Plan HRA recommends that residential development is not permitted within a 400m buffer zone around the Ashdown Forest SPA. This is on the basis that mitigation is unlikely to be successful since Ashdown Forest is within walking distance and people will use the site as their local recreation space.
- 5.5 The District Plan HRA recommends a Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) approach. This mitigation approach has been suggested for Mid Sussex since at least 2009.
- 5.6 The SANG and SAMM approach has been successfully adopted elsewhere at heathland sites such as the Thames Basin Heaths and Dorset Heaths. The District Plan HRA applies these principles to the Ashdown Forest context.
- 5.7 The second part of mitigation is to provide a contribution towards a SAMM strategy, which aims to manage visitors on-site at Ashdown Forest. *Following advice received from Natural England in April 2013, an interim SAMM Strategy was developed in summer 2013.* Natural England has confirmed its support for the Mid Sussex interim SAMM Strategy and has advised that the interim SAMM Strategy and tariff can be applied to relevant planning applications until it is superseded by the Joint SAMM Strategy⁷. The Joint SAMM Strategy is a framework of measures that are focused on access management projects on Ashdown Forest and bird and visitor monitoring. It is being prepared by Wealden District Council in close association with the affected local authorities, Natural England and the Conservators of Ashdown Forest. The Joint SAMM Strategy is currently work in progress and it is anticipated that it will be finalised by autumn 2016.
- 5.8 The District Plan HRA report concludes that the Focused Amendments to the Pre-Submission Draft District Plan will not result in adverse effects on the ecological integrity of the Ashdown Forest SPA and SAC and so the District Plan is compliant with the Habitats Regulations. Natural England has confirmed in a Statement of Common Ground⁸ that it is satisfied with the content of the District Plan HRA and concurs with the conclusions of the report.

⁶ See the *Habitats Regulations Assessment for the Mid Sussex District Plan* (October 2015).

⁷ See Section 9 of the *Ashdown Forest topic paper* for more detail on the interim and Joint SAMM Strategy.

⁸ See Appendix D of the *Ashdown Forest topic paper* for the Statement of Common Ground.

6. The Mid Sussex Transport Assessment

- 6.1 The Mid Sussex Transport Study - Stage 3 (ref. EP41) was commissioned April 2015 to report on the likely transport impacts of the Pre-Submission District Plan (June 2015). An amended Stage 3 Study was later commissioned to examine the likely transport impacts of the proposed overall increase to the District Plan housing provision and the inclusion of a strategic development at Pease Pottage made by the Focused Amendments to the Pre-Submission Draft District Plan (November 2015). The amended summary report also considers a number of sensitivity tests, namely the transport implications if the Pease Pottage Strategic site does not come forward in the plan period and the transport implications of the proposed Burgess Hill Science and Technology Park.
- 6.2 The Study concludes that the levels of development proposed in the Focused Amendments to the Pre-Submission Draft District Plan (November 2015) would not worsen the performance of the highway transport network, relative to the Reference Development Case, provided that a number of remedial schemes are introduced; and would not have any adverse impacts upon traffic flows in the Ashdown Forest.
- 6.3 Work is ongoing with Highways England to agree these remedial schemes, but sufficient work has been undertaken to ensure that potential impacts can be mitigated. The Council is working towards the agreement of a statement of common ground with Highways England. A statement will also be signed with the County, which has not raised any objections to proposals to date.
- 6.4 It should be noted that Highways England have not raised any objections to the planning application for development of 600 homes that has been received by the Council at Pease Pottage and which, if permitted, would deliver the District Plan's strategic allocation in this location. This is because they have been satisfied with by the applicant's Transport Assessment which demonstrates how the impacts can be mitigated.
- 6.5 However, after more than 12 months of joint working, Highways England have recently raised some queries about the cumulative effect of growth across the district, as whole, on the strategic road network, including the effects of recent consents and the allocations in adopted Neighbourhood Plans. The concern is for development which will lead to delays of 30 seconds or more on their network which is now seen as severe, and to identify the scope for mitigation in these cases. To this end the Council's transport consultants are doing some limited further analysis of their Saturn model outputs to establish the small number of junctions where the 30 second delay might occur and establish how such impacts can be reasonably mitigated. Neither Highways England nor the Council's transport consultants anticipate that any impacts will be identified which are incapable of being mitigated, however, this additional analysis has slightly delayed the signing of a statement of common ground with Highways England. The Council is also mindful of para 32 of the NPPF which suggests that development should only be prevented when effects are 'severe'.

Appendices

A1 SN1 - Housing Needs and Housing Provision

Contents

- Housing Market Area (HMA)
- Starting Point for Objectively Assessed Need (OAN)
- Sensitivity Testing and Adjustments
- Market Signals
- Affordable Housing Need
- Housing Provision – ‘Tipping Point’

Key Evidence Base Documents

Ref.	Document	Date Published
BP5	Sustainability Appraisal – Submission	August 2016
EP14	Sustainability Assessment of Cross-Boundary Options (LUC)	February 2015
EP20	Housing and Economic Development Needs Assessment (HEDNA)	February 2015
EP21	HEDNA Update	November 2015
EP22	HEDNA Addendum	August 2016
EP23	Strategic Site Selection Paper	August 2016
EP27	Strategic Housing Land Availability Assessment (SHLAA)	August 2016
EP29	SHLAA: Review of Landscape and Visual Aspects of Site Suitability	January 2015
EP47	Capacity of Mid Sussex to Accommodate Development Study (LUC)	June 2014

Summary of the District’s Objectively Assessed Need for Housing and Plan Provision

- A1.1** Mid Sussex District Council published a Housing and Economic Development Needs Assessment (HEDNA) in February 2015 in order to establish the Objectively Assessed Need (OAN) for housing for the plan period 2014-2031. This was produced in line with Planning Practice Guidance (PPG), in particular the section on “Housing and Economic Development Needs Assessments”.
- A1.2** Establishing the District’s OAN was based on a starting point of the Government’s up-to-date household projections – the 2012-based CLG Household Projections. The HEDNA undertook analysis and sensitivity testing and made appropriate allowances for vacancy rates and ‘Market Signals’. The OAN was therefore established as 627dpa as set out in the original HEDNA. This was revised within the HEDNA Update in November 2015 to 695dpa to account for new data releases. The Focused Amendments District Plan was prepared to account for the increase in OAN.
- A1.3** Following consultation on the Focused Amendments District Plan, further population and household projections were released. The District Council noted the advice within the PPG, and prepared a HEDNA Addendum to take account of these new figures. This increased the starting point OAN to 714dpa. After taking vacancy rates and market signals into account, the OAN was established as 754dpa. This represents the most up-to-date OAN for the District at the time of submission.
- A1.4** In terms of housing provision, the District Plan sets out a provision of 800dpa. This figure is 105dpa above the OAN established within the HEDNA Update (November 2015) and was the

number consulted upon at Focused Amendments Stage. Taking account of new population and household projections reduces this figure to 46dpa above the revised OAN, as set out within the HEDNA Addendum.

- A1.5** A number of neighbouring authorities cannot meet their objectively assessed need for housing. In particular, Brighton & Hove and Crawley, two neighbours with close links to Mid Sussex in migration/commuting terms, have large levels of unmet need between them. Following extensive Duty to Co-Operate discussions, the provision of 782 (46dpa) above OAN is to assist with the unmet needs of neighbouring authorities.
- A1.6** There is significant justification for the provision figure of 800dpa, both in sustainability terms and capacity terms. This figure represents a level of housing provision that would provide significant social benefits in terms of meeting Mid Sussex need and assisting neighbouring authorities, without having detrimental environmental effects. A level of housing provision above 800dpa would potentially see more benefits, but at environmental cost that would not outweigh such benefits. This has been deemed the “tipping point” and is explained in further detail below.
- A1.7** The District Council have therefore prepared a District Plan that:
- Has a sound basis for establishing the OAN, based on the requirements of the NPPF, PPG, best practice and examples from elsewhere (in particular neighbouring authorities that have successfully passed examination).
 - Meets the demographic needs of Mid Sussex, taking into account the most up-to-date population and household projections.
 - Provides for housing growth beyond the needs of Mid Sussex- a total of 782 dwellings (46dpa) to assist with the unmet needs of neighbouring authorities, even though there are environmental constraints in doing so.
 - Ensures that this growth is deliverable, sustainable, and not at irreversible environmental cost.

Establishing the OAN

Housing Market Area (HMA)

- A1.8** The 2009 SHMA identified the Northern West Sussex Sub-Regional Housing Market. It identified a partial overlap with the Coastal West Sussex Housing Market. The HEDNA (February 2015) reviewed the information and updated it where appropriate, and concluded that the Housing Market Area remained unchanged. The HEDNA, HEDNA Update and HEDNA Addendum combined form the role of the most up-to-date SHMA in terms of the NPPF requirement.
- A1.9** Further analysis was undertaken within the HEDNA, looking predominantly at house prices, commuting and migration patterns. It confirmed the findings of the 2009 SHMA, and established that the Northern West Sussex HMA is focussed upon Crawley, Horsham and Mid Sussex areas. There are inter-relationships between this HMA and the Coastal West Sussex HMA (which includes Brighton & Hove), particularly in the southern part of Mid Sussex. (EP20, para 2.77 - 2.78)

Starting Point for Objectively Assessed Need (OAN)

- A1.10** The HEDNA (February 2015) was produced in order to establish the District's OAN. At the time this was published, it calculated the 'starting point' OAN to be 570dpa based on the data available at that time.
- A1.11** The HEDNA Update (November 2015) took account of new CLG Household Projections released in February 2015 (known as CLG 2012) shortly after the first HEDNA was published. This projection showed an increase of 11,144 households during the plan period (2014-2031) which equates to 656 dwellings per annum (EP21, para 3.6 - 3.7). The starting point for OAN was therefore established as 656dpa. (EP21, para 3.38 - 3.43).
- A1.12** Further CLG Household Projections were published in July 2016 (CLG 2014). The HEDNA Addendum was published in August 2016 to take account of these projections. This established a new starting point for OAN of 714dpa (EP22, para 1.29), a starting point 144dpa above the one originally used when drafting the District Plan.

Sensitivity Testing and Adjustments

- A1.13** In order to follow best practice, an adjustment has been made to allow for vacant dwellings within the District. These homes are counted within the CLG's household projections but would not be contributing to meeting housing need (as they are second homes, holiday homes, or natural vacancies within the housing market).
- A1.14** Results from the last 3 Census' show that the number of vacant homes has reduced in the past 20 years. The vacancy rate in 2011 was 2.3% (EP21, para 4.6). In order to make an allowance for vacancies, an uplift of 2.3% has been applied to the starting point OAN of 714dpa.
- A1.15** The most up-to-date starting point OAN plus an allowance for vacancies is therefore 730dpa. (EP22, para 1.37)

Market Signals

- A1.16** The HEDNA (February 2015) analysed the various Market Signals identified within the PPG, comparing data from Mid Sussex with the rest of the authorities within West Sussex and the South East and whole of England averages. (EP20, Chapter 4)
- House price appreciation is lower than regional, county and national averages and lower than all local authority areas in West Sussex other than Crawley.
 - Affordability ratios are higher in Mid Sussex compared to West Sussex and England as a whole, however it is not exceptional against comparable areas. The proportion of those unable to buy or rent is broadly reflective across the wider area.
 - Mid Sussex has seen a decrease in the number of lettings between 2013 and 2014, compared with an increase in the Housing Market Area.
 - Rates of development have been steadily increasing over the past 5 years within Mid Sussex.
 - Mid Sussex indicates amongst the lowest levels of overcrowding compared to national, regional and county averages. Mid Sussex has one of the lowest levels of concealed households compared to adjacent and nearby authorities and a level of homeless acceptances well below County, South East and national levels.

- A1.17** The NPPG states that a worsening trend in any market signal indicates that an uplift to housing delivery to improve affordability should be considered. Whilst the analysis of market signals shows that the situation in Mid Sussex is not unique compared to other authorities in the region, it has been deemed sensible by the Council to apply an uplift. (EP21, para 5.12).
- A1.18** This was an uplift of 10% in the HEDNA (ref) however this was an arbitrary figure based on limited findings elsewhere at that time. Since then a common methodology across a number of areas within the South East has been applied and approved at Horsham, Arun and Chichester councils. These approaches were endorsed by their respective Inspectors. This method involves analysis of affordability issues within certain age groups and adjusting the OAN accordingly.
- A1.19** The age group most affected by affordability is the 20-34 age group. An adjustment has been made to the Household Representative Rates (i.e. the rate at which this age group is likely to be a 'head of household') to better reflect the headship rate at a time when the housing market was more affordable – i.e. pre-recession (2008). (EP21, para 5.13 – 5.23 and EP22, para 1.39).
- Making this adjustment increases the OAN by 24dpa.
 - Adding this to 730dpa (starting point + vacancy rate adjustment) gives the established OAN as 754dpa (EP22, para 1.44).

Objectively Assessed Need – Conclusion

- A1.20** The District Council has undertaken the assessment of housing need based on the NPPF and Planning Practice Guidance. Sensitivity testing has taken place, and relevant adjustments to account for affordability issues (as shown by market signals analysis) have been made to ensure that the OAN best reflects the need for housing and is calculated in a fair, objective and transparent manner.
- A1.21** During production of the District Plan, there have been two updates to both the population and household projections (in 2015 and 2016 prior to submission). The HEDNA has been updated each time in order to fully take account of these new figures, and the District Plan amended accordingly to react to this.
- A1.22** At Submission, the most up-to-date OAN for Mid Sussex is 754dpa.

Housing Provision – ‘Tipping Point’

- A1.23** With the need (OAN) established as 754dpa, work has been undertaken to ensure that this can be met by a sufficient supply of housing. The SHLAA confirms (EP27, Table 1) that there is capacity for the OAN to be met.
- A1.24** It is recognised that there is a high level of unmet housing need in neighbouring areas and that any extra capacity above OAN could be provided to assist neighbouring authorities.
- A1.25** There are positive benefits in terms of providing new homes within the District to meet District housing need as well as assisting neighbouring authorities who cannot meet their need. However, negative impacts are predicted to get more negative as the housing number increases, particularly in environmental terms. The point where negative impacts significantly and demonstrably outweigh the positive impacts has been termed the 'tipping point' (BP5, para 7.89 - 7.93)
- A1.26** A significant amount of work has been undertaken to understand where the 'tipping point' lies, and therefore the most sustainable housing provision number for the District Plan. Of particular relevance are:

- Capacity of Mid Sussex to Accommodate Development Study 'Capacity Study' ([EP47](#))
- Strategic Site Selection Paper ([EP23](#))
- Strategic Housing Land Availability Assessment (SHLAA) ([EP27](#))
- Sustainability Assessment of Cross-Boundary Options ([EP14](#))
- District Plan Sustainability Appraisal ([BP5](#))

A1.27 The Capacity Study assessed environmental capacity, infrastructure capacity and landscape capacity. It concludes that only 4% of the District isn't covered by a primary or secondary constraints (or is not already built) (EP47, para 6.12). It is concluded therefore that there are significant constraints to development within the District to meet its own needs, even before consideration of meeting needs from neighbouring authorities.

Sustainability Tipping Point

A1.28 A number of housing provision options were appraised in the Sustainability Appraisal, based on meeting the OAN and making a contribution towards meeting unmet needs of neighbouring authorities (BP5, 7.84 - 7.133):

- 700dpa
- 750dpa
- 800dpa
- 850dpa
- 900dpa
- 1000+dpa

A1.29 In conducting the assessment, the Council has had regard to the advice in paragraph 14 of the NPPF, and examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits; in the context of Mid Sussex it is also highly relevant that a considerable proportion of the District is designated AONB; a designation which in terms of the NPPF indicates that development should be restricted.

A1.30 In order to form a balanced and holistic view, therefore, the Council has assessed the sustainability of the various Options in various ways:

- By assessing the options against the full range of sustainability criteria (18 objectives covering social, environmental and economic impacts), making judgements about the degree to which those criteria would or would not be met
- By examining as a sub-set of that exercise the areas in which the various options most clearly diverged
- By making a judgment about the overall effect of the various options bearing in mind what the Council consider to be the key criteria for this policy: housing provision, economic growth, and environmental protection (principally landscape resource conservation). This is an important exercise because some of the criteria are incommensurable, and a tight focus on those that particularly matter to the overall sustainability of the plan has been thought to be helpful in judging between the different alternatives. It is also important to recognise that, where housing delivery is concerned, for instance, there are real constraints in the availability and deliverability of sites, such that the options involving higher housing numbers are to some extent theoretical rather than real.

- A1.31** The full criteria assessment gives an indication that, when balanced with any negative impacts, the overall benefits peak at around 800dpa, and thereafter begin to fall away. However, the adverse impacts steadily mount and increase markedly between 800 and 850 dpa options.
- A1.32** Unsurprisingly, as housing numbers increase, the more significant positive impacts are predicted on the objective concerned with providing housing (objective 1). Positive impacts are less certain in terms of access to health (objective 2) and education (objective 3) due to existing infrastructure deficits within the District. Increasing housing numbers are also likely to more positively support economic growth (objective 17). (BP5, para 7.89)
- A1.33** However, significant negative impacts are expected on objectives concerned with efficient land use (objective 7), protection of the countryside (objective 9), reducing road congestion (objective 11) and water quality (objective 13) as housing numbers increase. (BP5, para 7.89)
- A1.34** In terms of the negative impacts, these are predicted to worsen for options above 800dpa. This is predominantly because the SHLAA does not show a sufficient level of suitable sites to be able to deliver options above 800dpa, due to:
- Landscape impact (as confirmed by a separate Landscape Audit of the SHLAA (LUC)) ([EP29](#))
 - Impact on designated sites, including the AONB
 - Only a finite amount of brownfield/previously developed sites, meaning increased likelihood of provision being met by utilising greenfield sites
- A1.35** Delivering 800 units a year will still involve substantial greenfield development, and incursion into the AONB, and some adverse effects are therefore quite clear. However, they do not extend to the point where they significantly and demonstrably outweigh the benefits of the Option, and therefore, bearing AONB in particular in mind, the 800 dpa option (Option C) therefore best fits with overall sustainability objectives.
- A1.36** Provision below 800 dpa may protect the AONB and other aspects of the environment but provides too little by way of benefits and results in provision that does not both meet objectively assessed need and contribute to under provision beyond the district.
- A1.37** Options above 800dpa provide greater benefits, but the assessment suggests that they plateau quite soon, and come at a very greatly increased environmental cost as well as being practically undeliverable. Those options lie on the wrong side of the tests for sustainable development in the NPPF and have therefore been rejected.

Housing Supply – Tipping Point

- A1.38** The SHLAA (EP27) does not show sufficient suitable strategic or non-strategic sites to meet provision over 800dpa. Options over 800dpa would require:
- A further strategic site, of which alternatives have been rejected (see below)
 - Allocating smaller sites – the strategy is for Neighbourhood Plans to be given first opportunity to do this, with a Site Allocations DPD to follow. At present the SHLAA only shows capacity of suitable/developable sites to meet approximately 800dpa.
- A1.39** The Sustainability Appraisal (BP5, para 7.141 – 7.148) appraised a total of 17 strategic sites. The most sustainable sites were assessed to be:
- site (A) Land to the North of Burgess Hill (known as the ‘Northern Arc’): 3,500 units; and

- site (B) Land to the East of Burgess Hill (east of Kings Way): 480 units. This site has now commenced.

A1.40 The Strategic Site Selection Paper (EP23) assessed the same sites using sustainability and non-sustainability (e.g. delivery rate, contribution towards District/unmet need, site availability) criteria, based on criteria within the SHLAA. This paper also recommended allocation of a third strategic site based on its deliverability in the short term and ability to assist with unmet needs (particularly those arising from adjacent Crawley Borough)

- site (M) Hardriding Farm, Pease Pottage: 600 units.

A1.41 Despite its AONB location, it is felt that allocation of this site is justified and accords with the special circumstances set out within the NPPF (paras 14 and 116), as shown in the Strategic Site Selection Paper (EP23, para 1.54 – 1.55).

A1.42 Both the Sustainability Appraisal and Strategic Site Selection Paper rejected the other strategic sites put forward. The main reasons for rejection were environmental constraints, not being promoted/no prospect of delivery in the short/medium term, sites not available, significant transport issues, or low/negligible capacity for development in landscape terms.

A1.43 Allocating these three strategic sites (A), (B) and (M); alongside current commitments, completions (2014-2016) and smaller sites within emerging Neighbourhood Plans/Site Allocations DPD, would provide a housing provision of approximately 800dpa. As other sites have been rejected, it is concluded that a housing provision above this number would not be deliverable at this time.

Plan Provision - 'Tipping Point' Conclusion

A1.44 In sustainability terms, options above 800dpa were shown to have more positive impacts in terms of meeting housing need, but these were outweighed by the demonstrable impact this level of development would have on environmental objectives, in particular the AONB.

A1.45 In capacity terms, the SHLAA shows that there is sufficient supply of deliverable/developable sites over the plan period to meet a housing provision of 800dpa. Importantly, this would enable the District to meet its own housing need as well as making a contribution towards neighbouring authorities in order to assist them in meeting their unmet need.

A1.46 At the current time, there is not a demonstrable supply of sites to meet a housing provision in excess of 800dpa. This is also confirmed within the Sustainability Appraisal and Strategic Site Selection Paper, which assess a range of strategic sites (those above 500dpa) and concludes that the only three sites that can demonstrate their suitability for housing development are those proposed for allocation within the District Plan (two sites at Burgess Hill and a site at Pease Pottage).

A1.47 As sustainability impacts significantly worsen for any housing provision level over 800dpa, this is the 'tipping point'.

A1.48 The District Council has carefully considered all aspects with regards to the housing provision figure within the District Plan– both in the benefits it would bring to the District and surrounding areas, and the potential negative impacts that could arise as a result of increased house building.

A1.49 Meeting a plan provision of 800dpa is not without its own challenges. In order to meet the OAN, the District Council is proposing a large-scale (3,500 units) strategic site in one settlement. There is full coverage of Neighbourhood Plans, which are also allocating land for housing in order to meet local objectives and contributing towards meeting housing need within the District.

A further site has been proposed in the High Weald AONB in order to boost short term supply in a location which would benefit a neighbouring authority that cannot meet its housing need (Crawley). A housing provision above 800dpa has been demonstrated to have more negative impacts, and could not be met by a suitable housing supply.

- A1.50** Therefore, the Council believes it has considered the housing provision position carefully and balanced the needs for housing against environmental constraints as required by the NPPF. A thorough and robust evidence base exists to support this position.
- A1.51** Overall it is considered that a housing provision of 800dpa is the most appropriate for the District Plan and is the maximum level of housing provision for the District without reaching the 'tipping point'.

Conclusion

- A1.52** The Council has established the OAN and determined the most suitable and sustainable housing provision number in order to deliver this.
- A1.53** Since the original assessment of housing need was published, two further updates have been published to account for newly released projections data. The Council has assessed the impact of these new figures and has acted accordingly to ensure that the OAN is based on the most relevant and up-to-date data at any one time. The Council has assessed the impact of the increase in housing need and adjusted this accordingly. The Plan Provision number has also been revised to account for this, within environmental and capacity limits, and taken into account other factors such as the unmet needs of neighbouring authorities.

	Starting Point	Adjustments	OAN	Unmet Need	Plan Provision
HEDNA (Feb 2015)	570	57	627	23	650
HEDNA Update (Nov 2015)	656	39	695	105	800
HEDNA Addendum (Aug 2016)	714	40	754	46	800

- A1.54** Evidence shows that there is a sustainability 'tipping point' at 800dpa, as confirmed within the Sustainability Appraisal. Similarly the SHLAA shows that there are insufficient deliverable/developable sites for plan provision above this figure. The District Plan therefore plans for this 800dpa, as it balances the need for housing against demonstrable environmental impact, in accordance with the test within the NPPF.

- The Objectively Assessed Need for Mid Sussex is **754dpa** based on CLG Household Projections, and an allowance for vacancies and market signals.
- The Housing Provision for Mid Sussex is **800dpa** based on analysis of supply and environmental constraints (the 'tipping point').

- A1.55** This therefore includes a provision of 46dpa towards unmet needs of neighbouring authorities. This is predominantly directed at Crawley and Brighton & Hove due to their strong links with Mid Sussex in historic migration and commuting terms.

A2 SN2 - Housing Supply – Summary Note

Key Evidence Base Documents

Ref.	Document	Date Published
EP27	Strategic Housing Land Availability Assessment	July 2016
BP18	Housing Implementation Plan	August 2016

Strategic Housing Land Availability Assessment

Source of Supply	Deliverable (Years 1-5)	Developable (Years 6-10)	Developable (Years 11+)	Total Supply
Commitments (Within the Planning Process)	3,959	919	412	5,290
Site Not Currently in the Planning Process	239	1,413	1,554	3,206
District Plan Allocations (pending) at Burgess Hill	515	1,680	1,305	3,500
District Plan Allocations (pending) at Pease Pottage	150	250	200	600
Total Housing Potential	4,863	4,262	3,471	12,596

A2.1 The results of the SHLAA are summarised in the table above. It identifies a total housing potential of 12,596 dwellings for the period to 2031, from all sources of available land. These figures represent the sum of all available housing land in the District but should be viewed as a maximum 'palette of sites' to choose from in future plan-making decisions and not an acceptable sum total to deliver.

Breakdown of District's housing supply over the Plan period

Total housing requirement (2014 – 2031)	13,600
Supply	
Completions 2014/15	630
Completions 2015/16	868
Existing Commitments	
<i>Which is made up from :</i>	
Large allocated sites without planning permission	372
Neighbourhood Plan allocations without planning permission	319
Large sites with planning permission (outstanding units on sites of 6 or more)	4,282
Small sites with planning permission (less than 6 discounted by 40%)	317
Total Existing Commitments	5,290
Strategic development north and north-west of Burgess Hill (Policy DP9)	3,500
Strategic development at Pease Pottage (Policy DP9a)	600
Potential windfalls on site under 6 units	450
SHLAA sites (identified as deliverable within years 1 – 5)	239
Residual amount to be delivered through future Neighbourhood Plans and a Site Allocations Document (prepared by the District Council)	2,023

The 5 year Housing Land Supply position

A2.2 The housing trajectory set out in the Housing Implementation Strategy shows the five year supply position and a 20% buffer against the District Plan requirement of approximately 800 per annum

- Within the first five years of the Plan a total of 4,875 units will be delivered. This represents 36% of the total supply over the Plan period and therefore supply is higher in the first five years compared to years 6+ onwards.
- The District Plan's development strategy relies upon the delivery of two large strategic developments which means that longer lead-in times and regular delivery rates per annum over a number of years are inevitable. In addition, the general preference amongst Parish Councils is for steady, consistent housing delivery across the plan period. The Council also seeks to allocate further housing sites to top up the overall housing land supply. This work is due to commence in 2019 with adoption in 2021. Whilst this work may commence sooner if the Council cannot demonstrate a five year supply before 2019, the preference is that this approach delivers sites to top up the supply of housing over the middle to later years of the plan period. The proposed development strategy demonstrates that the pace of delivery is spread across the plan period, and collectively this gives a very strong argument for the use

of the Liverpool model (residual approach) for calculating the five year housing land supply and the method to address any shortfall against the housing requirement in Mid Sussex.

- The five year supply period covers the period 2016/17 – 2020/21. Using the Liverpool method the current five year requirement for the District is 4,034. With the 20% buffer applied this figure rises to 4,841. The District has a five year supply of 4,863 dwellings, which equates to a surplus of 22 dwellings or equivalent to 5.02 years supply.

Requirement		Note
District Plan housing requirement 2015 – 2020	4,034	Based on residual amount of 12,102 divided over 15 years remaining of the Plan.
Annualised housing requirement with 20% buffer applied (years 1 -5 only)	4,841	4,034 x 20%
Supply		
Commitments		
Large sites where development has commenced	1,573	Residual amount
Large sites with Planning permission where development has yet to commence	1,870	
Large allocated sites without planning permission	199	
Sites identified in the SHLAA	239	
Small sites with planning permission (with 40% discount applied)	317	
District Plan allocation at Burgess Hill	515	
District Plan allocation at Pease Pottage	150	Planning application pending decision
Total Housing Supply in year 1 – 5	4,863	
Five year supply	5.02	Total supply/Total requirement x 5
Surplus over period	22	

A3 SN3 - Affordable Housing including Starter Homes

Key Evidence Base Documents

Ref.	Document	Date Published
EP20	Housing and Economic Development Needs Assessment	February 2015
EP21	Housing and Economic Development Needs Assessment Update	November 2015
EP24	West Sussex Strategic Housing Market Assessment	May 2009
EP25	Northern West Sussex – Mid Sussex: Strategic Housing Market Assessment Update	October 2012
EP26	Northern West Sussex – Affordable Housing Needs Model Update	October 2014
EP30	Assessing the Scale and Nature of Starter Homes in Mid Sussex District / Addendum Report	March/ April 2016
EP43	Mid Sussex Community Infrastructure Levy and District Plan Viability Study	August 2016
--	DCLG Starter Homes Regulations – Technical consultation	March 2016
--	Written Ministerial Statement 28 November 2014	November 2014

Background and reasoning behind policy:

DP29: Affordable Housing

The Council will seek:

For all residential developments with a site area which exceeds 0.5 hectares in size (irrespective of the number of dwellings or the combined gross floorspace area to be provided), the provision of a minimum 20% starter homes units will be made along with the appropriate provision of other forms of affordable housing as required;

- A3.1** In the absence of regulations setting the requirements, the above threshold for starter homes is set to reflect the threshold proposed in the DCLG Starter Homes Regulations – Technical consultation (March 2016). This does not differentiate the requirement on the basis of whether it is within an AONB so it applies to the whole Mid Sussex plan area.
- A3.2** The term ‘along with the appropriate provision of other forms of affordable housing as required’ reflects that sites exceeding 0.5ha, may also be required to provide affordable housing on top of starter home units at the rates set out in DP29. The DCLG Starter Homes Regulations – Technical consultation at Section 3 (paragraph) recognises the importance of local planning authorities’ continuing to have local flexibility to secure additional Section 106 contributions in other forms of affordable housing other than starter homes where it is viable and there is demonstrable local need.

For residential developments providing a combined gross floorspace area of more than 1,000m² but a net increase of less than 10 dwellings and with a site area of less than 0.5 hectares in size, the provision of a minimum of 40% affordable housing (with no starter homes units) in accordance with the tenure mix stated below;

- A3.3** This provision is for sites that exceed the government ‘national affordable housing threshold’ policy within National Planning Policy Guidance (set by the Written Ministerial Statement (WMS) 28 November 2014) whereby affordable housing should not be sought from developers on developments below a combined gross floorspace area of 1,000m²; but do not exceed the proposed 10 dwelling threshold for starter homes. For such sites that exceed 1,000m² combined gross floorspace, the Council considers it justified and feasible to seek 40% provision of

affordable housing. Because the 10 unit starter homes threshold is not breached, the affordable housing sought does not include starter home units.

For residential developments providing a net increase of 10 dwellings, the provision of a minimum 20% starter home units. If such sites exceed a maximum combined gross floorspace area of more than 1,000m² the provision of a minimum 40% affordable housing provision of which half will be starter home units; half other forms of affordable housing provision, provided in accordance with the tenure mix stated below;

- A3.4** This provision is for sites providing 10 dwellings only. Such sites are required to provide 20% starter home units reflecting the proposed threshold and requirement set out in the DCLG Starter Homes Regulations – Technical consultation; and will need to provide ‘traditional’ affordable housing where they exceed a combined gross floorspace of more than 1,000m² as per the government ‘national affordable housing threshold’. Where such sites do exceed a combined gross floorspace of 1,000m², the overall provision of affordable housing increases to 40% provision (half starter home units and half ‘traditional’ affordable housing).

For all residential developments providing a net increase of 11 dwellings or above (irrespective of the combined gross floorspace area a minimum 40% affordable housing provision of which half will be starter home units and half other forms of affordable housing provision, provided in accordance with the tenure mix stated below;

- A3.5** This provision reflects that once a site exceeds a threshold of 11 dwellings, 40% affordable housing will be sought – half starter home units and half ‘traditional’ affordable housing, to comply with the ‘national threshold’ and the requirement proposed by the DCLG Starter Homes Regulations – Technical consultation.

Within the High Weald Area of Outstanding Natural Beauty:

- A3.6** This sets out the provisions of DP29 that apply in addition to the above for the plan area of Mid Sussex within the High Weald AONB. The High Weald AONB is differentiated in DP29 to reflect government policy as set out in NPPG.
- A3.7** A local authority may choose to apply a lower threshold of 5 units or less in designated rural areas. A designated rural area can be an Area of Outstanding Natural Beauty as described by Section 157(1) of the Housing Act 1986 and this has been adopted for policy purposes in DP29.

For residential developments providing a net increase of 6 – 9 dwellings, a commuted payment towards off-site provision, equivalent to providing a minimum 40% on-site affordable housing (with no starter home units) in accordance with the tenure mix stated below.

For such sites exceeding 0.5ha, a minimum 40% affordable housing provision of which half will be on-site starter home units; and half other forms of affordable housing as a commuted payment towards off-site provision, equivalent to providing the remaining half of the affordable housing on-site in accordance with the tenure mix stated below.

Payment for off-site provision would be commuted until after the completion of the dwellings within the development.

- A3.8** This reflects the government ‘national affordable housing threshold’ policy set by the WMS 28 November 2014 within NPPG. A lower affordable housing threshold is set within the High Weald AONB for developments of 6-9 units, excluding contributions from sites of 5 or less.

- A3.9** Such contributions seek 40% 'traditional' affordable housing, but these are sought as cash payments, commuted until after the completion of units within the development as per the WMS and NPPG. Where sites also exceed the 0.5 ha in size threshold set out in the DCLG Starter Homes Regulations – Technical consultation (March 2016), provision should be made in the form of half on-site starter homes and half traditional affordable housing (commuted payment until completion to reflect government policy set by the WMS 28 November 2014 and NPPG).
- A3.10** The Council also sets in DP18: Securing Infrastructure, a lower threshold for the High Weald AONB of 6 dwellings and above for seeking tariff style contributions.

For all residential developments providing a net increase of 10 dwellings, the provision of a minimum 40% affordable housing. Half of the affordable housing provision will be starter home units. A commuted payment will also be made towards off-site provision, equivalent to providing the remaining half of the affordable housing on-site in accordance with the tenure mix stated below.

The payment for affordable housing excluding starter homes would be commuted until after the completion of the dwellings within the development.

- A3.11** This is for sites providing 10 dwellings only. Such sites are required to provide 20% starter home units reflecting the threshold and requirement set out in the DCLG Starter Homes Regulations – Technical consultation which does not differentiate between areas in or outside of an AONB; and will also need to provide 'traditional' affordable housing at 20% provision but as a commuted payment until after the completion of units within the development (to reflect government policy set by the WMS 28 November 2014 and NPPG).

Tenure mix – For the provision of affordable housing other than starter home units, a mix of tenure will be required (normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes, unless the best available evidence supports a different mix). Details on tenure mix and the provision of affordable housing will be set out in a supplementary planning document.

- A3.12** The 2014 Affordable Housing Needs Update (Para 5.29 onwards) concluded that demand for Intermediate Housing remains significant (as found in the 2012 SHMA update); and that the Intermediate Housing Zone Agents application and waiting list offers clear evidence of this from within and outside the Northern West Sussex Housing Market Area.
- A3.13** The 2014 Affordable Housing Needs Update (Para 5.33) concludes there is a need to ensure a choice and mix of affordable housing and recommended that a split of affordable housing is provided as social rent and as intermediate housing at between 70:30 and 80:20 i.e. between 20 – 30% affordable housing as intermediate stock.

Proposals that do not meet these requirements will be refused unless significant clear evidence is provided to show that the site cannot support the required affordable housing from a viability and deliverability perspective. Details of the evidence required to justify a revision to the affordable housing requirements will be set out in a Supplementary Planning Document.

- A3.14** A Developer Contributions SPD is proposed to be adopted shortly after adoption of the District Plan. This will set out the procedure for negotiating planning obligations when there are issues concerning the viability of development. This approach supports the 'general viability exemption'

approach set out in the DCLG Starter Homes Regulations – Technical consultation (March 2016).

Free serviced land should be made available for the affordable housing (except Starter Home units). All affordable housing should be integrated with market housing and meet national technical standards for housing including “optional requirements” set out in this District Plan (Policies DP25: Dwelling Space Standards; DP26: Accessibility and DP42: Water Infrastructure and the Water Environment) or any other standard which supersedes these.

- A3.15** The provision of free serviced land by developers for affordable housing is a ‘standard’ arrangement. The affordable housing is then usually built out by the developers of the site, at a price agreed between themselves and the Registered Provider of the affordable homes.
- A3.16** The delivery mechanism for starter homes is likely to be a private developer who then sells directly to private buyers and therefore there would unlikely be a transfer of free serviced land to a Registered Provider.

The policy will be monitored and kept under review having regard to the Council’s Housing Strategy and any changes to evidence of housing needs.

Table 1 – Summary of policy requirements

	Net increase of dwellings	Site area	Combined gross floorspace area	Provision of starter homes (on-site)	Provision of other affordable homes
	1+	>0.5ha	n/a	20%	Nil or 20% depending on policy requirements
	1 – 9	<0.5ha	<1,000m ²	Nil	Nil
	1 – 9	<0.5ha	>1,000m ²	Nil	40%
	10	<0.5ha	<1,000m ²	20%	Nil
	10	n/a	>1,000m ²	20%	20%
	11	n/a	n/a	20%	20%
Within High Weald AONB	1+	>0.5ha	n/a	20%	Nil or 20% depending on policy requirements
	1 - 5	<0.5ha	n/a	Nil	Nil
	6 - 9	<0.5ha	n/a	Nil	40% commuted payment
	6 - 9	>0.5ha	n/a	20%	20% commuted payment
	10	n/a	n/a	20%	20% commuted payment
	11	n/a	n/a	20%	20%

Justification for District Plan affordable housing policy

- A3.17** In order to gain a clear, up to date understanding of housing needs in Mid Sussex, an update to the affordable housing needs assessment model was undertaken in 2014 jointly with Crawley Borough and Horsham District Councils for the Northern West Sussex Housing Market Area – the Northern West Sussex Housing Market Area – Affordable Housing Needs Model Update (2014 AHNM).
- A3.18** The 2014 AHNM built upon previous studies of housing need undertaken for the Northern West Sussex Housing Market Area in 2009⁹ and 2012¹⁰, and demonstrates inter alia the amount of affordable housing that will be necessary to meet housing needs at the local level in Northern West Sussex. The 2014 AHNM was based on the ability to meet current and future affordable housing need through existing and committed future affordable housing stock.
- A3.19** The Affordable Housing Needs model presents four affordable housing needs scenarios. The scenarios consider the affordable housing needs arising from those groups that local authorities are required to give “reasonable preference” to (the ‘low estimate’), and the entire local authority housing waiting list (the ‘high estimate’).
- A3.20** Reasonable preference groups include those households that are homeless and in priority need, those occupying unsanitary or overcrowded housing, and people who need to move on medical or welfare grounds. The total waiting list represents all those on the Housing Register and also includes other households who cannot afford to rent or buy property without assistance and may therefore be living with parents and unable to set up their own home.
- A3.21** Two of the scenarios presented in the 2014 AHNM (Scenarios B and D) utilise an approach based on cancelled SHMA Practice Guidance. This is considered in the HEDNA (February 2015)¹¹ (to present an artificially high net annual housing need figure. Therefore only the outputs of the affordable housing needs model, presented as Scenarios A and C in the 2014 Affordable Housing Needs Model are considered relevant for the purposes of assessing affordable housing need.
- A3.22** The affordable housing needs model was further updated in the Housing and Economic Development Needs Assessment (November 2015) to account for a subsequent review of the housing register; an upward adjustment to the CLG Household Projections data; and a significant change in the committed supply of affordable housing. The model calculated that a plan provision of 800 dwellings per annum would generate a net annual housing need of 191 (‘low estimate’) to 294 (‘high estimate’) households. The HEDNA Addendum (2016) further updates this position using the latest CLG projections although the net affordable housing need figure remains the same.
- A3.23** The HEDNA (November 2015) indicated that a plan provision of 30% affordable housing provision at 800 dwellings per year would meet the needs of all those in reasonable preference groups with around 82% of the total waiting list met. The Mid Sussex Whole Plan and Community Infrastructure Levy Viability Assessment (2015) demonstrated that the provision of 30% affordable housing did not unduly impact upon the viability of development generally across the area, taking into account the requirements of other policies in the development plan, and there was sufficient headroom for the charging of Community Infrastructure Levy. However, neither of these evidence documents accounted for the impact of starter homes.

Impact of starter homes and justification of a 40% overall requirement for affordable housing

⁹ Northern West Sussex Strategic Housing Market Assessment – May 2009

¹⁰ Northern West Sussex – Mid Sussex Strategic Housing Market Assessment Update - October 2012

¹¹ Paragraph 4.159 onwards

- A3.24** The level of overall affordable housing provision was reviewed further to take into account the impact of providing starter homes units as part of the package of affordable housing provision. The MSDC Starter Homes Study (March 2016 and April 2016) considers the potential effects of delivering starter homes on the supply of other forms of affordable housing (also termed ‘traditional’ affordable housing¹²), reflecting the proposed requirements set out in the Starter Homes Regulations – Technical Consultation (March 2016).
- A3.25** The Starter Homes Study assumes that the delivery of the requisite proportion of starter homes is a priority as the Government intends and assess the effects by applying a 20% starter homes requirement alongside various levels of traditional affordable housing contribution. The Study is based upon the housing need measured in the HEDNA (November 2015) of between 191 – 294 dwellings per annum.
- A3.26** The HEDNA considers not only those on the housing register, but those unable to buy or rent privately without assistance. The Study finds that starter homes could potentially contribute to meeting the needs identified in the HEDNA to the order of 44 to 51 households per annum based on households with an income able to support a mortgage of between £181,440 and £250,000. These are households that are able to purchase starter homes, but are unable to afford to purchase housing on the open market.
- A3.27** The Starter Home Study demonstrates that maintaining 30% overall provision of affordable housing (amounting to 2/3 starter homes and 1/3 other forms of affordable housing) would meet 57% of the needs of those in reasonable preference groups and 32% of the needs of those on the waiting list for affordable housing. The Study concludes that a 30% contribution would be insufficient to ensure that other forms of affordable housing (affordable rent and intermediate tenures) can be supplied to meet the HEDNAs modelled range of housing needs and that a raised policy contribution would be necessary to more closely meet the identified affordable housing needs in full.
- A3.28** Seeking to meet the affordable housing needs of Mid Sussex is an objective of the District Plan and accords with national planning policy. The Study found that an increase to an overall provision of 40% affordable housing (half starter homes and half other forms of affordable housing) would meet the needs of all those in reasonable preference groups and meet a significant amount of the total waiting list (64%).
- A3.29** This evidence must be sense checked and combined with other information that considers the viability and deliverability of housing developments in order to set affordable housing targets and appropriate thresholds through District Plan policy.
- A3.30** The Community Infrastructure Ley and District Plan Viability Study (2016) demonstrates that the District Plan target of 40% affordable housing provision, including the forthcoming requirement for Starter Homes, can be viably delivered on the majority of sites that are expected to come forward over the plan period; and that there is sufficient headroom on the non-strategic sites (the strategic sites would most likely deliver infrastructure through s106 agreements) for the charging of a Community Infrastructure Levy at a sufficient rate that is balanced in terms of delivering the affordable housing and infrastructure needed to support sustainable development.

¹² Affordable rent and intermediate tenures

Conclusions

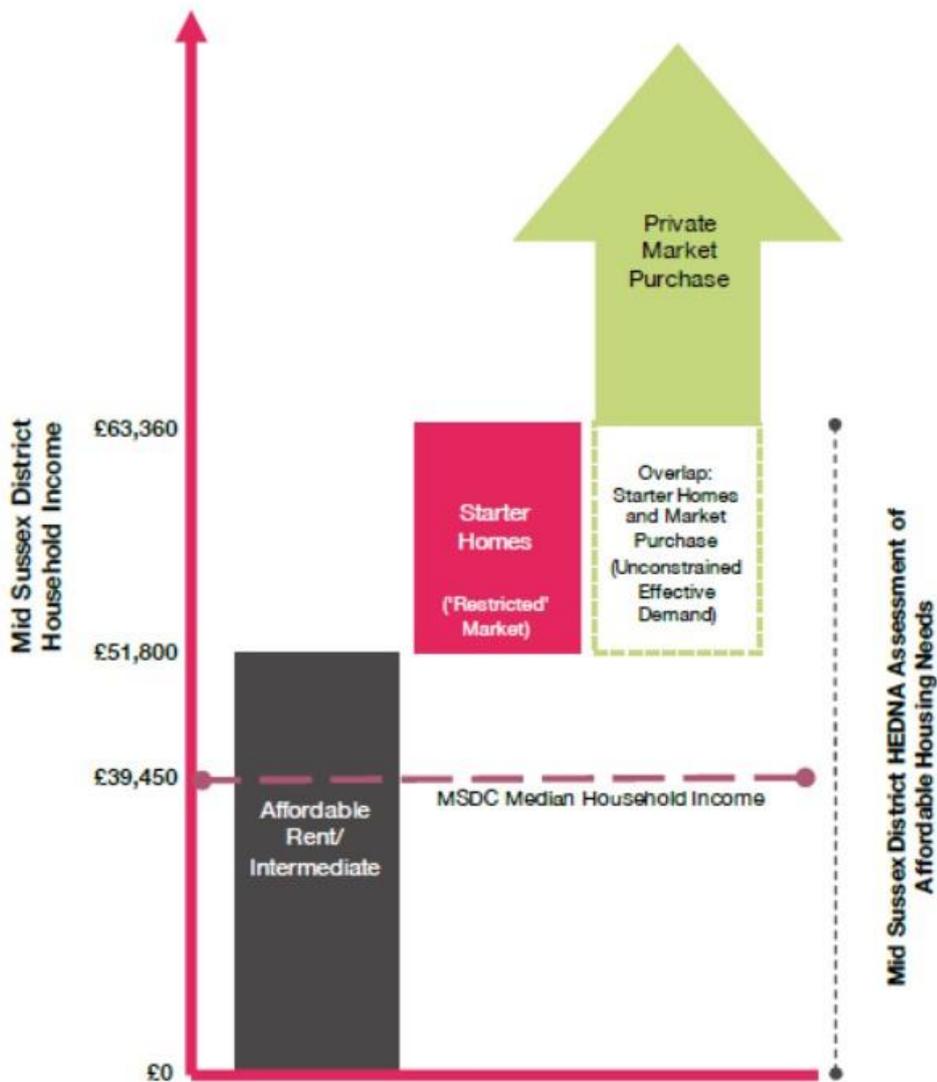
- A3.31** Despite a marked increase in the supply of affordable housing and a significant committed future affordable housing supply, both of the relevant 'low' and 'high' scenarios in the 2014 AHNM and the Housing and Economic Development Needs Assessment (November 2015) highlight a continuing high level of affordable housing requirement needed in each local authority area within the Northern West Sussex Housing Market Area, including Mid Sussex.
- A3.32** The affordable housing needs analysis demonstrates that Mid Sussex has an affordable housing need that is greater than the supply of such housing on an annual basis. The analysis therefore demonstrates that there is a need for new affordable housing in future and provides the underlying justification for affordable housing policies contained within the District Plan.
- A3.33** Maintaining a 30% overall provision of affordable housing (amounting to 2/3 starter homes and 1/3 other forms of affordable housing) would be insufficient to ensure that other forms of affordable housing (affordable rent and intermediate tenures) can be supplied to meet the HEDNA modelled range of housing needs.
- A3.34** Raising the affordable housing contribution to 40% would facilitate the provision of starter homes at the government's requisite levels whilst maintaining an adequate supply of 'traditional' affordable housing to better meet the affordable housing needs of Mid Sussex. This approach is considered to be justified and balanced in terms of its viability and not causing harm to the development of the area, and in delivering the affordable housing and infrastructure needed to ensure this development is sustainable.

Table 2 – Impact of starter homes provision on meeting affordable housing needs

A	B	C	D	E	F	G	H	I
AH Policy Requirement	Total Planned Housing (DPA)	Total AH Supply	SH Supply Delivered (20%)	Non-SH Affordable Housing Supply	Affordable Rent Supply	Shared Ownership Supply	Residual Affordable Housing Need	Over/ Under Supply of Affordable Rent and Intermediate Housing (per year)
	<i>District Plan</i>	<i>B x A</i>	<i>B x 20%</i>	<i>C - D</i>	<i>E x 75%</i>	<i>E x 25%</i>	<i>HEDNA need (low estimate 191 / high estimate 294) minus 44 to 51 households potentially met by SH provision*</i>	<i>E - H</i>
30%	800	240	160	80	60	20	140 to 250	-60 (Core) to -170 (All)
35%	800	280	160	120	90	30	140 to 250	-20 (Core) to -130 (All)
40%	800	320	160	160	120	40	140 to 250	+20 (Core) to -90 (All)

- AH – affordable housing SH – starter homes
- These are those households that are able to purchase starter homes, but are unable to afford to purchase housing on the open market. These households are indicated by the 'red box' in Figure 1.

Figure 1 – Household incomes related and ability to purchase starter



* Household Incomes assume max mortgage borrowing of 3.5 x household income

A4 SN4 - Northern Arc strategic development – Summary Note

Contents

- Summary
- Background
- Policy evolution
- Sustainability
- Housing
- Employment
- Highways and Transport
- Centre for Community Sport
- Gypsies and Travellers
- Education
- Other Infrastructure
- Wider Growth at Burgess Hill

Key Evidence Base Documents

Ref.	Document	Date Published
EP38	Strategic Economic Land Availability Assessment	May 2016
BP3	Sustainability Appraisal – Focused Amendments	November 2015
EP27	Strategic Housing Land Availability Assessment	November 2015
EP42	Infrastructure Delivery Plan	June 2015
EP36	Burgess Hill Employment Sites Study Update	March 2015
EP33	Mid Sussex Gypsy and Traveller Accommodation Assessment	May 2014, June 2013
EP35	Northern West Sussex Economic Growth Assessment	April 2014
EP58	Burgess Hill Town Wide Strategy	August 2011
	Burgess Hill: Visioning the Future	July 2007
	Feasibility Study for Development Options at Burgess Hill	September 2005

Summary

- A4.1** The Northern Arc strategic development proposals have arisen from positive and coordinated planning work involving the County, District, Town and Parish Councils, recognising the benefits of significant housing and economic growth in delivering improvements to the town and community infrastructure.
- A4.2** The strategic development will deliver a high quality urban extension to Burgess Hill and support the town's regeneration and improvement.

Background

- A4.3** Major development opportunities at Burgess Hill have long been recognised. Appraisal work was undertaken by the District and Town Councils to assess the various options around the town from 2004 onwards, including work by both Atkins and David Lock Associates.
- A4.4** A 'Town Wide Strategy for the Next 20 Years' was subsequently prepared by Burgess Hill Town Council in 2011, with a steering group comprising Town, District and County

Council representatives and local developers. The Town Wide Strategy identified the following vision:

- *“A fully sustainable 21st century town focussed around a high quality, vibrant and accessible town centre;*
- *A town that’s existing and future population is supported by the necessary community facilities, employment opportunities and access to green open space; and*
- *A town that functions efficiently and is underpinned by a state of the art transport network and modern supporting infrastructure.”*

A4.5 The Town Wide Strategy sought to identify residential development that would help to deliver and support the town improvements and the community facilities that were sought through the strategy. It identified a resultant need for around 4,000 new dwellings. The Town Council considered two sites to be of merit:

- “Land to the east of Kings Way
- Land to the north of the town – known as the Northern Arc or Northern Sector”

A4.6 The Town Wide Strategy was the subject of public consultation in 2010-11.

Policy evolution

A4.7 The District Council has taken forward these proposals through the emerging District Plan, proposing to allocate both sites (policies DP7, DP8 and DP9) for a total of approximately 4,000 dwellings.

A4.8 The District Council has worked closely with the Town and County Councils and with the three main prospective Northern Arc developers (Gleeson, Rydon and Wates) and the Kings Way developer (Sunleys) in drafting and refining these policies.

Sustainability

A4.9 Sustainability lies at the heart of national planning policy. Through the Sustainability Appraisal and the Strategic Sites Selection Paper (ref. EP23), the Burgess Hill allocations have been assessed and scored very positively.

A4.10 The Northern Arc would form an urban extension to Burgess Hill. It will provide housing, employment and a wide range of community facilities in close proximity, reducing the need to travel. The site has few constraints. It also has the significant benefit that it is actively promoted, well progressed and can deliver a good supply of housing in the short term.

Housing

A4.11 The Northern Arc strategic development is a vital component of the District Plan in housing terms. It will make a very significant contribution of approximately 25% of the District’s housing needs over the plan period. The development will contribute to the District Plan’s initial five year housing supply and then make a steady and significant contribution over the remainder of the plan period.

A4.12 The Northern Arc will deliver a wide range of housing types, including both flats and houses, affordable housing and housing for the elderly. Discussions are also underway on the delivery of Starter Homes.

A4.13 Following detailed work in conjunction with the prospective developers, policy DP24A proposes an average density of 40 dwellings per hectare across the Northern Arc. This will make the best use of land and significantly increase average densities achieved

over recent years, whilst also taking account of existing character and market demands. Higher density housing will be provided along the link road and in the eastern area close to Wivelsfield Station.

- A4.14** The Sunleys scheme to the east of Kings Way, identified in the Town Wide Strategy and allocated by policy DP8, is under construction. It will deliver 480 new homes, make infrastructure contributions totalling around £6.5 million as well as delivering 30% affordable housing, a country park, a neighbourhood centre and community facilities.

Employment

- A4.15** Demand for employment land was identified and assessed through the District-wide Burgess Hill Employment Sites Study and the Economic Growth Assessment.
- A4.16** The Northern Arc will contain around 30 hectares of employment land to help meet the District's needs, encourage sustainable development by the close proximity between new housing and new jobs, and allow for growth of companies in and around Mid Sussex. Outline planning permission has already been granted for The Hub (ref 13/01618/OUT), which covers approximately 15 hectares of the Northern Arc's employment land. A reserved matters application for the first unit on site is anticipated in September 2016.
- A4.17** The proposed employment land is located at the western end of the strategic development, offering easy and convenient access to the strategic road network, the existing Victoria Road business park and Burgess Hill town centre.

Highways and transport

- A4.18** A link road through the strategic development is necessary to deliver increased traffic capacity and avoid exacerbating congestion on existing roads. The link road will join the A2300, offering quick and easy access westwards to the A23/M23 corridor.
- A4.19** The County and District Councils have successfully secured £16.9 million from the Local Growth Fund to assist with dualling the A2300 between the Northern Arc and the A23.
- A4.20** Consultants appointed by the County Council have assessed the implications of the Northern Arc in transport terms and are working closely with the developers' transport consultants to mitigate identified impacts. Details of the proposed transport mitigation is contained within the District Council's Infrastructure Delivery Plan.
- A4.21** Design focussed masterplan discussions have concluded that the link road will have a residential character, with housing fronting the road but with few direct vehicular accesses. This will help to create a high quality residential environment and closely integrate the road with the wider development.
- A4.22** The link road will bring pace and certainty to the delivery of housing. The Council is working closely with the Government to provide the link road.
- A4.23** The link road will continue through the Northern Arc to join Maple Drive, facilitating a public transport route through the whole development. County Council appointed

transport consultants have produced a public transport strategy for the town. Discussions are underway with operators to consider new and amended services to maximise the benefits for new and existing residents and employees.

- A4.24** Sustainable transport will also be supported by pedestrian, cycle and equestrian routes. The Green Circle network will be extended through the development, creating a leisure route around the town for walkers, cyclists and horse riders. This will be supplemented by 'spokes' running into the town centre to encourage sustainable transport. A segregated cycle path is also proposed along the Northern Arc link road.

Centre for Community Sport

- A4.25** The Northern Arc will include a 10-11 hectare Centre for Community Sport to help meet the outdoor sports needs of new and existing residents of Burgess Hill. This will achieve a key ambition within the Town Wide Strategy.
- A4.26** The Centre will be in close proximity to St Pauls Catholic College and the Triangle Leisure Centre, offering benefits in shared use by schools and the public and potential for shared management arrangements. The Town and District Councils have already undertaken survey work of local sports clubs to ascertain their needs and will use this as a basis for progressing the new Centre.

Gypsies and Travellers

- A4.27** Recognising both the scale of the Northern Arc strategic development and the need to deliver housing for all sectors of the community, Policy DP9 seeks to deliver provision of gypsy and traveller pitches on a proportionate basis with the Northern Arc's contribution to meeting overall housing needs. The policy has been positively revised in discussion with the developers to give greater flexibility in terms of how and where the required pitches are delivered.

Education

- A4.28** West Sussex County Council appointed consultants to review education provision within Burgess Hill and the surrounding area in order to assess the need for provision within the Northern Arc.
- A4.29** The consultant has identified a need for two primary and one secondary school within the strategic development. The developers have made provision for these schools within their draft emerging masterplans.

Other infrastructure

- A4.30** The District Council is working closely with the Clinical Commissioning Group and local GP practices to ensure that the best and most appropriate provision is made for existing and future residents of Burgess Hill. The CCG is undertaking a review of floorspace and demands for services across the Burgess Hill area and seeking to make the best use of its estate. Initial discussions have taken place with the developers about locating any medical facility within a neighbourhood centre.
- A4.31** The District Council is working closely with the development consortium for the strategic allocation to the north and northwest of Burgess Hill to ensure development is brought forward in a timely manner to maintain a continuous supply of land for housing in the district. The District Council has appointed a senior officer who has responsibility

for working closely with the consortium on both the policy and development management sides of the planning process. The Council has also appointed a number of other specialists to assist in bringing the Northern Arc forward in a timely manner. Masterplanning work is already well underway on the strategic development and the District Council, the consortium and other stakeholders are positively engaged in discussions on infrastructure delivery and transport provision.

- A4.32** The District Council is working closely with the Homes and Communities Agency, Coast to Capital Local Enterprise Partnership and other partners to progress the development.

Progress towards planning applications

- A4.33** There have been many meetings between the Council at all tiers, the developers and other stakeholders to progress the Northern Arc towards submission of planning applications. Environmental Impact Assessment Scoping Opinions were formally issued for the Western (Rydon and Gleeson) and Eastern (Rydon) sites on 30 October 2014 and for the Central (Wates) site on 8 July 2015.

- A4.34** The developers have also undertaken their own public consultation work. For Rydon and Gleeson, Nexus undertook public consultations in Burgess Hill in late 2014. Details can be found on the Nexus website:

<http://www.nexusplanning.co.uk/?goo-news=burgess-hill-northern-arc-public-consultation>

- A4.35** Savills carried out similar public consultation work in October 2015.

Wider growth at Burgess Hill

- A4.36** The District Council views the Northern Arc as part of much wider regeneration proposals for Burgess Hill, which are illustrated on the following map.

- A4.37** A major town centre redevelopment scheme was approved in early 2016. This will deliver new retail outlets, a multiplex cinema, new homes, a library and a hotel. The existing Lidl store will be relocated to a former gas-holder site to facilitate the town centre scheme. A number of other sites, such as at The Brow and Burgess Hill Station, have been identified for development in the Burgess Hill Neighbourhood Plan.

- A4.38** Residential development commenced in 2015 at the Kings Way and Keymer Tile Works sites to the west of Burgess Hill, which will deliver almost 1,000 new homes and significant contributions to the town's infrastructure.

A5 **Transport Summary Note**

A5.1 To follow

A6 SN 6: Employment and Jobs – Summary Note

Contents

- Overview
- Northern West Sussex Economic Growth Assessment
- Burgess Hill Employment Sites Study
- Objectively Assessed Need for Employment Development
- District Plan Provision for Employment Development
- Strategic Employment Land Availability Assessment

Key Evidence Base Documents

Ref.	Document	Date Published
EP35	Northern West Sussex Economic Growth Assessment	April 2014
EP36	Burgess Hill Employment Sites Study Update	March 2015
EP38	Strategic Economic Land Availability Assessment	May 2016
EP20	Housing and Economic Development Needs Assessment (HEDNA)	February 2015
EP21	HEDNA Update	November 2015
EP22	HEDNA Addendum	August 2016

Overview

- A6.1** Employment land and job numbers forecasting is not an exact science.
- A6.2** There are alternative approaches to assessing job creation numbers: workforce based vs Full Time Equivalent vs demographic-led.
- A6.3** The conclusions of the Northern West Sussex Economic Growth Assessment (EGA) and the Burgess Hill Employment Sites Study (BHES) differ because of the various underlying datasets which they used and the different time periods over which their assessments were based.
- A6.4** The findings of the EGA have not been unequivocally accepted by the Crawley and Horsham local plan Inspectors.
- A6.5** The Council principally relies on the BHES because it is more up-to-date and exactly mirrors the District Plan period of 2014-2031 whereas the EGA covers 2011-2031 and contains over-optimistic job creation numbers.
- A6.6** The BHES found that there is a realistic demand for between 25-30 hectares of employment land in Mid Sussex between 2014 and 2031.
- A6.7** The Strategic Employment Land Availability Assessment (SELAA) demonstrates that there is a more than adequate future potential supply of employment land (77 hectares) to fulfil this requirement for 25-30 hectares of employment land.

Summary of the employment and jobs evidence / provision

Study	Timeframe	Dataset used	Job creation numbers per annum	Total employment land required
EGA (April 2014)	2011 - 2031	Experian, May 2013	Baseline: 521 (workforce basis) Higher growth: 671 (workforce basis)	30.7ha. 52.8ha.
BHESS (March 2015)	2014 - 2031 2014 – 2030	Experian, December 2014 Oxford Economics, January 2015	491 (workforce basis) (282 FTE basis) 369 (workforce basis 2014 – 2030)	25-30ha. ¹³
SELAA (May 2016)	2014 - 2031	N/A	N/A	77ha. of future employment land potentially available
HEDNA	2014 - 2031	Demographic output (POPGROUP)	370 (workforce basis as an output of providing 800dpa)	30ha.

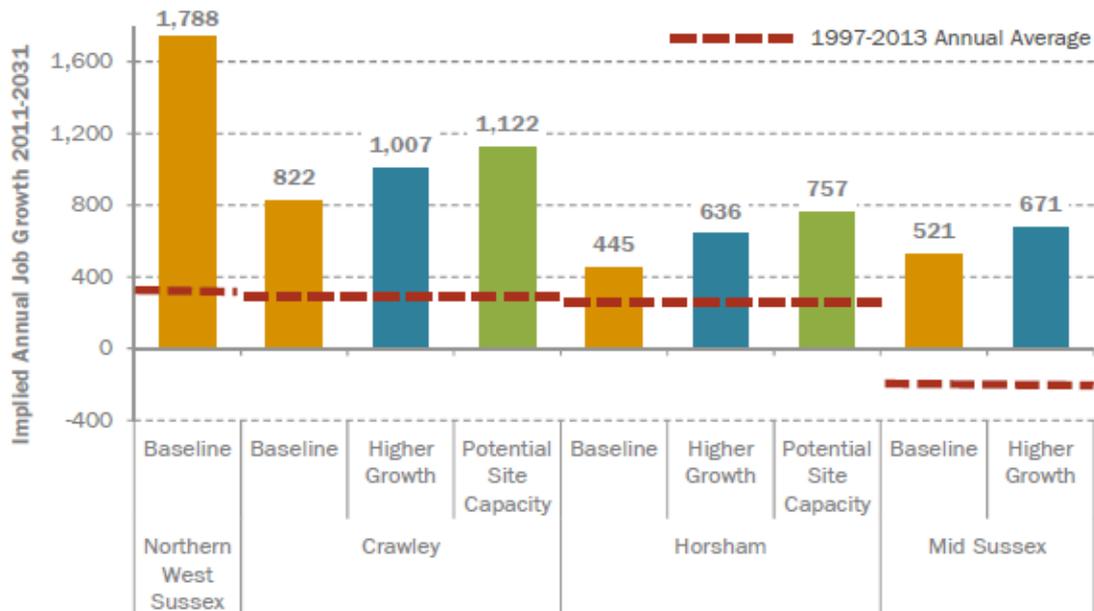
Northern West Sussex Economic Growth Assessment

- A6.8** The Northern West Sussex Economic Growth Assessment (EGA) (*EP35*) provides information on the need for employment development in Mid Sussex and the wider housing market area. The EGA converts Experian-derived job forecasts for the period 2011-2031 into floorspace and site area requirements for new employment development. The work was jointly commissioned by Horsham and Mid Sussex District Councils and Crawley Borough Council.
- A6.9** The EGA developed two potential future economic scenarios to provide a framework for considering economic growth needs in the district. These were a baseline scenario and an alternative higher growth scenario. These scenarios drew on Experian quarterly economic modelling from May 2013 which was based on national and regional projections profiled to take account of past trend growth and the representation of economic sectors at the local level.
- A6.10** The baseline scenario was derived from the May 2013 model run of the Experian UK Regional Planning Service, which provides local area forecasts for 38 industrial sectors and provides detailed employment and Gross Value Added estimates for the period until 2031. The forecasts reflect a range of standard assumptions about the

¹³ Includes 4.7ha. for Gatwick Airport-related growth without a second runway and some unmet need of neighbouring authorities.

way in which the national and regional economy is expected to perform, incorporating short and long term drivers. The baseline scenario predicts that 10,425 additional jobs will be created in Mid Sussex between 2011 and 2031, equivalent to **521** jobs per year on a workforce basis. This translates into a requirement for **148,250m²** or **30.7** hectares of B use class employment space (i.e. offices, industrial and warehousing). The majority of this would be needed for the Class B1(a), B2 and B8 uses.

- A6.11** The EGA modelled an alternative higher growth scenario for Mid Sussex which explored the potential for enhanced higher-value economic growth within a number of key growth sectors identified by the Gatwick Diamond and Coast to Capital Local Enterprise Partnership (LEP). It also took account of planned investment or intelligence about future sector/site potential and provided an indication of additional growth capacity over and above the baseline scenario. Under this alternative scenario, a total of 13,425 jobs would be generated in Mid Sussex between 2011 and 2031, equivalent to **671** jobs annually on a workforce basis. This would require the provision of **242,080m²** of employment floorspace or **52.8** hectares of employment land.
- A6.12** The EGA emphasises that although these forecasts are widely recognised as a valuable input and can indicate the broad scale and direction of economic growth in different sectors to help assess future employment space requirements, they tend to be most reliable at national and regional scales and consequently less so at the local economy level. The EGA also acknowledges that both the baseline and the alternative scenarios of employment growth within Northern West Sussex exceed the levels of growth recorded within the sub-region in recent years (1997-2013). The EGA comments that the contrast is particularly stark with regards to Mid Sussex, with the 2013 baseline forecast implying a shift from moderate job losses over the last 16 years to relatively significant job gains over the next 20 years. Because of this, the EGA explains that planning to meet the employment and spatial implications associated with the minimum baseline scenario would in itself constitute positive planning for growth.
- A6.13** Whilst the Council accepts the findings of the EGA in general, it considers that its forecasts for employment generation should be treated with caution. Concern exists about the underlying workforce figures that were fed into the forecasts. For example, it appears that the increase in the state retirement age was the sole reason for the implied 9% increase in the working age population. In addition, the figure in the EGA of 62,155 for the total number of existing jobs in 2013 implied an unrealistic recovery from the 52,000 jobs in 2010 included in the Northern West Sussex Part II Employment Land Review.
- A6.14** The lack of realism of the Experian-derived projections in the EGA is highlighted by Figure 1 below which illustrates that the job growth of the two modelled scenarios would be far in excess of the actual annual average growth in jobs over the previous 16 years.



Source: Experian / NLP analysis

Figure 1: Annual job growth implied by EGA growth scenarios

A6.15 The Planning Inspector who examined the Horsham District Planning Framework had similar misgivings about the forecasts in the EGA. In his report of 8th October 2015, the Inspector commented:

“In the context of my Initial Findings regarding housing provision, I expressed a note of caution about the forecasts, in the light of evidence about the local economy. I understand that the methodology used in the forecasting involved the analysis and breakdown of the local economy into a number of sectors, to which projected national growth rates were applied. This may not provide a particularly accurate prediction of future growth in a changing employment environment locally. There are indications of such change in Horsham, particularly in the market for large scale offices, although the district’s role as a key part of the ‘Gatwick Diamond’ is not likely to diminish, and could be altered considerably depending on the outcome of the decision on the third London runway.”

“The baseline scenario of 445 jobs pa also represents a large increase on historic job growth between 1997 and 2013 of 273 jobs pa. An update to this figure submitted at the resumed hearing suggested a higher annual rate of 340 jobs pa but even so the EGA scenarios indicate a very significant uplift in historic job growth performance. As the EGA acknowledges the projected increase in total B class jobs could be regarded as optimistic based on past performance.” [IR 18 & 19]

A6.16 In the case of Mid Sussex’s other housing market partner, Crawley, the local plan Inspector accepted that, because of the severe constraints on the availability of developable land in Crawley, there would be a shortfall in the order of 35 hectares of employment land and noted that *“... analysis of the data does not provide unequivocal support for either the baseline or the higher growth scenarios [in the EGA].”* (IR 72)

Burgess Hill Employment Sites Study

- A6.17** The Burgess Hill Employment Sites Study (BHES) (*EP36*), which was published in March 2015, provides the most up to date information on the need for employment development across the whole of Mid Sussex. This explains that Mid Sussex has seen a steady economic recovery since the recession. The BHES states that the forecasts are for an economic growth rate of 2.1% per annum between 2011 and 2031 (Experian, December 2014). This compares with a forecast economic growth rate of 2.35% per annum for West Sussex for the same period.
- A6.18** The BHES comments that employment growth in Mid Sussex between 2001 and 2011 was slightly above the West Sussex and South East average according to the Office for National Statistics. However, economic forecasters indicate a reduction in employment in this period for Mid Sussex. The latest economic forecasts for Mid Sussex from Experian (December 2014) show a different pattern of growth by industry sector compared with the May 2013 Experian forecasts that were used by NLP for the EGA. This has resulted in a slight reduction in the forecast number of total jobs between 2011 and 2031 (from 10,425 in the May 2013 Experian forecasts to 9,563 in the December 2014 Experian forecasts, both on a workforce basis). The latest forecasts for the District Plan period 2014-2031 are for an increase of 8,340 jobs on a workforce basis across all sectors. This equates to **491** jobs per annum.
- A6.19** The Experian data is an economic forecast of the jobs expected to be created within Mid Sussex based on trends and to a certain extent predicted housing growth (which is a circular argument). This figure will contain those jobs filled by in-commuters and those who both live and work in the district. The Experian figure of 491 jobs per year will therefore account for a certain level of in-commuting continuing, which is to be expected.
- A6.20** The BHES notes that the level of growth of the B use class sector jobs has reduced more markedly than that for the total jobs between the two sets of forecasts, reflecting the structural changes that have happened in the economy. The latest Experian forecasts (December 2014) indicate an overall increase of 676 B use class jobs on a workforce basis and 205 B use class jobs on an FTE basis for the period 2014-2031.
- A6.21** In terms of the potential demand for employment land, the BHES explains that these B use class employment forecasts translate into a potential land demand requirement of 19.5 hectares under a baseline assessment. Sensitivity analysis was then applied by the consultants to this assessment, which indicates a potential range of 15.7 to 31 hectares over the District Plan period 2014-2031. The overall assessment of the study was that there is a realistic demand for between **25-30 hectares** of employment land in Mid Sussex between 2014 and 2031. This includes the provision of 4.7 hectares for growth associated with Gatwick Airport under its existing single runway operation and meeting some unmet employment needs beyond Mid Sussex.
- A6.22** According to the BHES, the proposed employment land allocation to the west of Burgess Hill would therefore be needed to satisfy employment land needs within the district and support unmet needs arising in neighbouring authorities.
- A6.23** Overall, the study concludes that the proposed 30-hectare employment land allocation in the District Plan is appropriate and necessary in order to ensure that

Mid Sussex District can meet its economic growth objectives, support existing businesses wishing to expand and to encourage inward investment within the district, the Gatwick Diamond and the Coast to Capital LEP area more widely.

Objectively Assessed Need for Employment Development

A6.24 Based upon the assessment in the Burgess Hill Employment Sites Study, which is the most up to date commentary ('the last crank of the handle') on the need for employment development in the district, there is an 'Objectively Assessed Need' for **491** new workforce jobs and **25 – 30 hectares** of land for employment purposes.

District Plan Provision for Employment Development

A6.25 The Mid Sussex District Plan makes provision for 30 hectares of employment land for high quality business parks as part of the strategic allocation to the north and north-west of Burgess Hill (see Policies DP2: Sustainable Economic Development, DP7: General Principles for Strategic Development at Burgess Hill and DP9: Strategic Allocation to the north and north-west of Burgess Hill).

A6.26 In addition, Policy DP2 supports the principle of the development of a Science and Technology Park to the west of Burgess Hill. An independent study has been commissioned to assess the feasibility and demand for such a development, and there is landowner and university interest in bringing a site forward on the south side of the A2300. If this facility were to be realised, it could provide an additional 48 hectares and 100,000m² of employment land and premises, and would meet a sub-regional need, so the pool of labour from which it would draw could be expected to be wider than Mid Sussex district alone.

A6.27 Analysis within the HEDNA Addendum (*EP22*) using POPGROUP demographic modelling software indicates that the level of housing growth proposed in the District Plan (800 dwellings per year) would result in the need to create an average of approximately **370** new jobs annually in order to accommodate the increased workforce in the district.

A6.28 This figure does not include those people who in-commute – this figure is the estimated 'Live/Work in Mid Sussex' additional jobs. In other words, if 800 new homes are built each year, taking into account that some of their new residents will out-commute (to the same level as in the past), there will be a need for approximately 370 jobs in the district for Mid Sussex live/workers. This jobs figure would increase should out-commuting decrease and more people both live and work in the district.

A6.29 The District Plan could still result in the baseline 491 jobs per year 'target' being met – of which 370 will comprise the live/workers generated by the new housing, and the balance (121) either from increased in-commuting (i.e. from meeting neighbouring authorities' unmet employment needs) or by a reduction in out-commuting so that the 370 live/workers figure increases towards 491. It is important to note that the jobs target of 491 does not specify where the workers are from.

A6.30 Developers may argue that the housing provision number should be increased in order to meet the jobs target. Whilst increasing housing provision would increase the workforce available, there are more efficient ways of meeting the jobs target. For instance, a reduction in out-commuting over the plan period (which is likely given

trends between Census 2001 and 2011) would mean that a higher percentage of Mid Sussex residents would form the workforce within Mid Sussex as opposed to forming workforce in other authority areas– therefore the Mid Sussex jobs target could be met by utilising the existing workforce within the District rather than increasing the overall workforce supply (by building houses).

Strategic Employment Land Availability Assessment

- A6.31** The Strategic Employment Land Availability Assessment (*EP38*) was completed in May 2016. It identifies a possible future supply of land which is suitable, available and achievable for economic development uses over the plan period 2014-2031. The study assessed a total of 140 sites, 118 of which were considered in detail.
- A6.32** In years 1 – 5 of the plan period, 10.5 hectares of employment land are considered to be potentially deliverable together with another 16.6 hectares which have the benefit of planning permission. In years 6 -11, the developable supply amounts to 56.1 hectares (excluding the potential Science and Technology Park at Burgess Hill). For year 11 of the plan period onwards, there are assessed to 10.5 hectares of potentially developable employment land.
- A6.33** This potential supply of employment land represents a ‘reservoir’ or pool of land and sites that could be used for B use class development in the future.