

Mr Jonathan Bore
Mid Sussex District Plan Inspector
c/o 260 Collingwood Road
Sutton
SURREY SM1 2NX

19 December 2016

Dear Mr Bore

**Mid Sussex District Plan Examination
Response to hearings 29 November and 9 December 2016
The role of Neighbourhood Plans in allocating housing sites**

At times during the public hearings 29 November to 1 December 2016 reference was made to the role of Neighbourhood Plans (NPs) in identifying site allocations to meet the District Plan's housing numbers.

The hearings acknowledged that the site allocations to date are not enough to meet the District Council's submitted numbers, and that emerging NPs would be expected to offer sufficient allocations to meet the Plan's objectives. The premise was also that existing made NPs might be reviewed by their Parishes and Towns in order to provide additional allocations beyond those already defined in their plans. If the NPs did not offer sufficient numbers then the District Council would impose strategic sites onto NP areas. In the event that the adopted District Plan emerges with a further uplift on its submitted housing numbers, then there will be a need to allocate still further sites, presumably also through the Neighbourhood Plan process.

Our Neighbourhood Plan was made in March 2015 following an extensive process of public consultation, an independent examination, and a referendum giving overwhelming support of our proposals for, amongst other matters, several new housing site allocations for over 300 new homes, all of which are being delivered in the early part of the Plan period. Our Neighbourhood Plan and our housing forecasts were made following a wide review of available information, and not with particular reference to the then emerging District Plan numbers, to cover the period up to 2031. Our Plan also provided for significant employment land allocation, as our contribution to the Burgess Hill Northern Arc strategic development, and its provision of housing for the District. Therefore our Plan does not need to be reviewed in light of housing numbers in the now emerging District Plan.

We have previously received advice from the District Council, supported by DCLG, that a Neighbourhood Plan cannot be amended or reviewed except by repeating the process, including a new referendum. It is very unlikely that there would be circumstances in the near term in which this Parish Council would be willing to revisit our Neighbourhood Plan, and take new housing site allocations to the public for a referendum. The significant financial cost of repeating the NP process would be an unacceptable burden on a modest parish council, and we would also expect our community to seriously question the validity of the original NP process and the conclusions reached. Any Neighbourhood Plan review, if it is needed, should therefore be towards the end of the Plan period, and not soon after it has been made.

The Minister for Housing and Planning (Rt Hon Gavin Barwell MP) made a ministerial statement to the House of Commons on 12 December 2016, in which he stated:

The Government confirm that where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted. However, communities who have been proactive and worked hard to bring forward neighbourhood plans are often frustrated that their plan is being undermined because their

local planning authority cannot demonstrate a five-year land supply of deliverable housing sites.

This is because Paragraph 49 of the National Planning Policy Framework states that if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites relevant policies for the supply of housing should not be considered up-to-date, and housing applications should be considered in the context of the presumption in favour of sustainable development.

As more communities take up the opportunity to shape their area we need to make sure planning policy is suitable for a system with growing neighbourhood plan coverage. Building on proposals to further strengthen neighbourhood planning through the Neighbourhood Planning Bill, I am today making clear that where communities plan for housing in their area in a neighbourhood plan, those plans should not be deemed to be out-of-date unless there is a significant lack of land supply for housing in the wider local authority area. We are also offering those communities who brought forward their plans in advance of this statement time to review their plans.

This means that relevant policies for the supply of housing in a neighbourhood plan that is part of the development plan should not be deemed to be "out of date" under paragraph 49 of the National Planning Policy Framework where all of the following circumstances arise at the time the decision is made:

This written ministerial statement is less than 2 years old, or the neighbourhood plan has been part of the development plan for 2 years or less;

the neighbourhood plan allocates sites for housing; and

the local planning authority can demonstrate a three-year supply of deliverable housing sites.

We see this statement as significant support for those NPs that are made and provide housing site allocations. We therefore submit that the Mid Sussex District Plan cannot presume or imply to make additional strategic housing site allocations in the area of our made Neighbourhood Plan.

This Parish Council is committed to supporting sustainable growth through the local plan and neighbourhood planning process, and we very much hope to be able to continue working with the District Council in achieving our aims.

Yours sincerely

Stephen Hoyles
CLERK TO THE COUNCIL