

To Mr Bore
Planning Inspector for the
Mid Sussex District Plan

1 Old School Court
Lewes Road
Lindfield
West Sussex
RH16 2LD
29 March 2017

Dear Mr Bore,

I have been given copies of the correspondence between MSDC and you following your interim letter of 20 February on housing numbers. But MSDC's letter to yourself of 23 March and your reply of 24 March leads me to write this letter because I am concerned that lower overall housing numbers are now being mooted, and touched upon, of 15,792 rather than the 17422 in your interim letter and which you said would not be the subject of further discussion.

As you know from the hearings, I am an ordinary member of the public with no linkage or leanings towards MSDC, the Forum/Developers or the various lobby groups. I have throughout the hearings provided papers and oral evidence based on my own views, much of which has been at variance with the Forum's housing figures and MSDC's figures. The hearings were very open and fair and although I argued for a 10% uplift for market signals and the provision of about 100 dpa for Crawley's unmet need, giving an overall housing figure for MSDC of about 900 dpa, nevertheless, I wrote to you after your interim letter acknowledging that your arguments for an overall housing number of 1026 dpa were both fair, rational and logical in terms of the written and oral evidence provided to you by the various parties.

I acknowledge that in your letter of 24 March to MSDC you are asking for MSDC and Crawley to provide a joint statement which represents a clear and objective assessment of the effects of a housing total of 15,792 based on MSDC's view that Mid Sussex should only provide 150 dpa for Crawley's unmet need from 2025/26 onwards because MSDC assert that Crawley can meet its OAN from sites available and deliverable in its own bailiwick up to about 2025. However, I am getting a little concerned that the we are beginning to open up the question of the total housing need for Mid Sussex and it seems to me that if we are moving that way then this debate should be something which all parties should be able to contribute evidence towards rather than it being left to MSDC and Crawley to come up with an agreed position without others being able to contribute. In saying this, I recognise unequivocally that it is for you to conduct the Hearings and the Examination but I felt that, given my unease above, I should respectfully raise my concerns with you.

In terms of evidence already before the Examination on Crawley's unmet needs, I have set out in an attachment what I have culled during the Hearings and it shows that if MSDC provides for no unmet need for Crawley until 2025/2016 it will have to increase its overall housing number year by year from 2025/26 to 2030/31 (a period of only 6 years) to 1301 dpa. In other words, if MSDC only provides for its OAN of 876 dpa year by year up to 2024/5 then MSDC would need to ratchet up its

housing provision to 1301dpa to help(together with Horsham) to meet Crawley's unmet need. These stark numbers are why I am uneasy about there being no opportunity for everyone to contribute to the suggestion by MSDC that it will only meet 150dpa for six years from 2025/26 onwards ,i.e 900 homes for Crawley's unmet need, rather than the 2550 homes which Crawley needs from MSDC to meet its unmet need.

It is clear that Crawley's unmet need requires the 2550 homes that MSDC has been tasked with providing for Crawley's unmet need together with the 3000 homes that the Horsham Inspector has required Horsham provide towards Crawley's unmet need. This would provide a total of 5500 homes to meet Crawley's declared unmet need of 5025 for its 15 year plan period to 2029/30, but this would rise to about 5500 homes of unmet need when adding the extra year for 2030/31 which is the end date for Horsham's and MSDC's plan periods(the increase in unmet need in this final year simply reflects the fact that in 2031/31 and beyond Crawley will have very little developable land available in its Borough).

I do hope that you will recognise that this is a crisis de courtes, from someone who is concerned but has no professional planning background, and that I have written in that spirit to express my concerns.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Neil Kerslake', with a long horizontal flourish extending to the right.

(NEIL KERSLAKE)

ATTACHMENT TO MY LETTER OF 30 MARCH 2017

AN ANALYSIS OF DATA AVAILABLE ON CRAWLEY'S UNMET NEEDS

WHAT WE KNOW

1 Crawley's OAN is 675 dpa but it can only meet 340 dpa leaving a declared unmet need of 335 dpa.

2. Crawley's Plan runs from 2015/6 to 2029/30 (i.e. 15 years) whereas Horsham's District Plan runs from 2011/12 to 2030/31 (i.e. 20 years) and MSDC's District Plan runs from 2014/15 to 2031/31 (i.e. 17 years).

3. Based on paragraphs 1 and 2 above, Crawley's unmet need over its 15 year plan period is $335 \times 15 = 5025$ homes.

4 Horsham's Inspector required Horsham to provide 150 dpa towards Crawley's unmet needs over Horsham's 20 year plan period, i.e. $150 \times 20 = 3000$ homes. And, Mid Sussex has been set, by Mr Bore, 150 dpa over its 17 year plan period to meet Crawley's unmet needs, i.e. $150 \times 17 = 2550$.

5. It follows from paragraphs 3 and 4 above, that the total unmet need for Crawley being met by Horsham and Mid Sussex combined will be $3000 + 2550 = 5500$ up to 2030/31 compared with Crawley's declared unmet need of 5025 up to 2029/30. If we add about 450 for Crawley's unmet need for 2030/31 (Crawley will hardly be able to provide any housing in its own bailiwick by 2030/31) then Crawley's unmet need will be about 5500 over the 16 years to 2030/31.

WHAT IS ALLEGED

6. MSDC, in its letter to Mr Bore of 23 March 2017, indicates that Crawley can meet its OAN up to about 2025. My recollection was that Crawley could only meet its OAN up to about 2022 at most as its development was heavily front loaded in the first half of its plan period. Whether I am right or MSDC are right, the fact remains that Crawley's sites for meeting its OAN will be pretty much exhausted either in 2025 or 2022 and from then on Crawley will rely on Horsham and Mid Sussex to meet all of its unmet need.

7. Horsham are providing for Crawley's unmet need on a relatively even annual basis but if MSDC provided for none of Crawley's unmet need until 2025/26, MSDC will need to provide an extra 2550 homes (paragraph 4 above refers) in the six remaining years of MSDC's plan period on top of its OAN of 876 dpa, i.e. 2550 divided by 6 years = 425 dpa to which must be added MSDC's OAN of 876 dpa = 1301 dpa. In my view, this very high figure can only be met in the last six years of the MSDC District Plan by providing between 2 and 4 strategic sites in Mid Sussex which MSDC will need to identify.

NEIL KERSLAKE

29 March 2017