

**From:** Nicky Rolfe [<mailto:nicky.rolfe@quod.com>] **On Behalf Of** John Rhodes  
**Sent:** 30 January 2017 15:56  
**To:** Pauline Butcher, Programme Officer  
**Cc:** [Christopher.Tunnell@arup.com](mailto:Christopher.Tunnell@arup.com); Lee Newlyn; Adrian Fox; [Chris.Tunnell@midsussex.gov.uk](mailto:Chris.Tunnell@midsussex.gov.uk); John Rhodes  
**Subject:** MSDC5a, MSDC6 and MSDC7

Pauline,

I am aware that the Council has issued the above documents in anticipation of the resumption of the Examination next week.

Mayfields comments on MSDC5 were set out in our email of 23 January (see below).

Mayfields do not wish to comment further on MSDC5a – the changes made to MSDC5 do not affect the comments which we have provided.

Mayfields do not wish to engage in representations or a discussion about the merits of the 5 sites reviewed by the Council in MSDC6 and it is very unlikely that Mayfields would want to engage either in the complementary list of sites being generated by the Developers Forum.

However, there are some additional matters of general application raised in MSDC6 and MSDC7 on which Mayfields wish to make some short comments.

#### **MSDC6 : SHLAA**

The Council's note asserts that the methodology for the SHLAA was agreed by developers at a workshop with Peter Burley (paragraph 1) and that the methodology accords directly with the methodology set out in the PPG (para 4).

As a matter of record, Mayfields does not accept these assertions as being consistent with the evidence before the examination. In particular:-

- a) The SHLAA itself (April 2016) at page 15 contains the Council's note of the meeting with Peter Burley in January 2015, at which Mayfields were represented. On page 15 of the note it is recorded :-

“a participant asked for clarity that new settlements incorporating necessary services and facilities would not be excluded from assessment due to being un-related to existing settlements. Alice Henstock gave assurance that new settlement sites would be assessed and wording would be added to make this clear at Appendix D of the methodology.”

No such change has been made.

- b) Mayfields own record of the January 2015 meeting is set out in our representations to the District Plan of July 2015, at para 7.25. There we record concern about the methodology and its apparent exclusion of new settlements, along with a generalised concerned voice by a number of participants that fixing the SHLAA methodology was premature to the proper identification of the scale of housing requirement for which the District Council should be planning.

- c) MSDC2 (para 8.1.4) contains the same claim that the methodology was agreed at the January 2015 meeting. However, the following paragraph goes on to explain:-

“8.1.5 – the Council has considered the representors argument about the methodology used for developing the SHLAA in some detail and concludes that none merit any amendments to the methodology.” In other words, the methodology is not agreed.

- d) The principal reasons for Mayfields concerns are summarised in our email of 23 January 2017 (below).

The extent to which the methodology is consistent with the PPG has already been discussed at the examination and the Inspector himself has drawn attention to the requirement within the PPG for the Council to consider what action would be needed to remove any identified constraints (paragraph 022). As set out below, the Council has not taken this approach either generally or specifically in relation, for example, to Mayfields.

I would be grateful if you could draw this email to the attention of the Inspector and also grateful if you would place this email together with our email of 23 January on the Examination website please.

Thank you very much for your help.

Regards.

John



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