

## MID SUSSEX DISTRICT PLAN

### MAYFIELDS RESPONSE TO THE INTERIM CONCLUSIONS

Mayfields support the interim conclusions that the scale of unmet needs in neighbouring Coastal West Sussex authorities necessitates a requirement for the District Plan to make a commitment that the Council will co-operate with neighbouring authorities so that this issue can be fully taken into account in the next review of the District Plan.

The scale of the acknowledged housing need and the urgency to address the documented unmet need in the sub-region, creates a necessity for a commitment to an early review to be included within the District Plan. It is important for the soundness of the plan that such a commitment is effective, direct and specific.

With respect, the interim conclusions are not sufficiently specific to provide the confidence or assurance that the necessary review will be effective or undertaken within a sufficient period of time. The Inspector considers that the two year period pressed for by some is too onerous given the scale of the task but then states that *“a review is unlikely to be more than 5 years away.”*

It is apparent from the Inspector’s letter of 17 March 2017 addressed to the District Council that the Inspector is referring here to the prospect of a sub-regional review being undertaken through the LSS3 work. As the Inspector says, however:

***“the evidence given to the examination demonstrated very clearly that the LSS 3 work is at a very early stage, that of identifying study boundaries; so far, there appears to have been little substantive progress (certainly nothing substantial to consider in the examination) nor even any indication of a timescale. I was only prepared to accept the LSS3 work as an appropriate route in respect of the coastal authorities’ unmet needs because of the complexity and scale of that issue, the number of authorities involved and the acknowledged differences in migration cause – and – effect compared with those of Mid Sussex. But Crawley is a different matter.”***

Again, with respect, such an approach does not appear to be consistent with the NPPF, the requirements of which in respect of the un-met needs of neighbouring authorities are clear. Given the complete failure of the Plan to address its obligations under the NPPF, coupled with the substantial scale of the unmet need, this is not a satisfactory outcome and nor could it be the basis of a sound plan.

There is no need for a proper consideration of un-met needs from coastal authorities to await a distant sub-regional review and it would be wrong to defer such important issues into the apparent “long grass”. The scale of documented unmet need, for instance, in Brighton and Hove and in Lewes District significantly exceeds that of Crawley Borough. The scale of un-met need is established and it is entirely practical for Mid Sussex to undertake an objective assessment of the capacity of its own district to determine what contribution it can make. The development plan process has already established the absence of capacity in neighbouring authorities.

A clear commitment to a review is necessary, therefore, and it is clear from the history of this matter that a specific requirement needs to be placed on the District Council – a generalised reference to a review will not be effective.

Critically, a clear timescale is necessary to provide the necessary incentive for the Council to proactively address so that these important issues are addressed.

Against this background, we set out below suggested wording to be included within the District Plan:

***“Mid Sussex District Council is committed to an early review of this plan to identify what proportion of the documented unmet need of its neighbouring authorities can reasonably and sustainably be met within its administrative boundary consistent with approach required by paragraph 14 of the NPPF. As part of discharging this duty, and given the urgency of addressing this matter, a partial review of the Plan will be submitted to the Secretary of State within X years of the adoption of the District Plan. Where appropriate to address cross boundary issues this partial review will be undertaken in co-operation with neighbouring authorities, including Horsham District but its principal focus will be to test the contribution to the already documented unmet need that can be made by Mid Sussex.”***

The precise period of time will be for the Inspector to judge but it is important to have regard to the following:

- i. The unmet need is very substantial, well documented and should already have been addressed – the preparation of a NPPF compliant District Plan for Mid Sussex is urgent and well overdue;
- ii. Without a specific timescale the history of planning in this part of Sussex (coupled with the absence of a programme or a resourced process to produce a wider sub-regional study) means that there can be no expectation that the unmet need will actually be addressed;
- iii. The Housing White Paper promotes 5 year reviews as a matter of course – the circumstances in Mid Sussex are much more extreme and warrant a determined, disciplined programme within a shorter timescale; and
- iv. The review of the Horsham Local Plan has begun and the opportunity for a coordinated, cross boundary planning between the two districts should not be lost again.

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