

Our Ref: 02/590



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8 November 2016

Dear Sir/Madam,

**MID SUSSEX DISTRICT PLAN 2014-2031  
EXAMINATION – HOUSING MATTERS**

I refer to the Examination to the Mid Sussex District Plan to consider 'Housing Matters' at hearings commencing on 29<sup>th</sup> November 2016 and running to 2<sup>nd</sup> December (4 days). I also refer to the following documents in relation to this topic:

- Examination Inspector's (Jonathan Bore) letter to Mid Sussex District Council (MSDC) dated 15<sup>th</sup> September 20126 which set out his 'initial questions' on housing matters.
- MSDC's response to the questions in their letter dated 29<sup>th</sup> September 2016.
- Notes and Questions for Examination provided by the Inspector dated 12 October 2016.
- Inspector's Examination Guidance Note dated October 2016.

As you know, we act for LAMBS who have made a number of representations to the various stages of the Mid Sussex District Plan as follows:

1. Representations to the Consultation Draft Mid Sussex District Plan dated 16<sup>th</sup> January 2015.
2. Representations to the Pre- Submission Mid Sussex District Plan dated 24<sup>th</sup> July 2015.
3. Representations to the Focused Amendments to the Pre-Submission Mid Sussex District Plan dated 15<sup>th</sup> January 2016.

The January 2016 representations included reports on the drainage/flood risk and transport issues associated with a proposed new settlement promoted by Mayfield Market Town (MMT) through their various representations to the District Plan. The reports were prepared by Motion and Transport Planning Associates (TPA) respectively.

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These submissions do not repeat those already provided but do comment on Question 8 of the Inspector's Questions for Examination which deals with '*Site Selection and Housing Distribution*'.

The Inspector's letter of 15<sup>th</sup> September states at section 3(i) under the heading 'Calculating the housing requirement': *'It is my preliminary view that the SHLAA may have ruled out potentially suitable sites for example through the use of over rigid criteria. The PPG states that where constraints have been identified, the assessment should consider what action would be needed to remove them....actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy which is currently constraining development.'* The Inspector goes on to state that in such circumstances *'there is a risk of eliminating eligible sites....including sites for possible new settlements'*.

The Inspector concludes that *'in the event that further sites need to be made available for housing development I should also like the Council's views on the various approaches that may be available, such as the identification of further strategic sites, alterations to the policies to allow further development adjacent to settlement boundaries and the bringing forward of work on the Site Allocations Plan'*.

MSDC's response highlights the progress made on 20 neighbourhood plans, 16 of which are made and which deliver some 2,000 new homes in addition to the strategic allocations provided in the District Plan. MSDC also confirm that the Site Allocations DPD will be progressed to enable the Plan's housing requirement to be delivered in full in the later years of the Plan period. The DPD will allocate further housing sites including strategic opportunities to reflect the Plan's Settlement Hierarchy.

With regard to the MMT proposals which straddle the local authority's boundaries of Horsham and Mid Sussex districts (with 5,000 homes in each) they comprise wholly unsustainable development in an isolated location with little or no infrastructure and no local or political support. Importantly, the independent Inspector assessing the Horsham Plan rejected the proposal after extensive representations were made by MMT at 2 Examinations/hearing sessions in November 2014 and July 2015.

I would take the opportunity to raise the following relevant matters:

1. MSDC's Sustainability Appraisal (SA) of November 2015 considered the distribution of development including option (E) *'focus development towards a new settlement'* and also considered broad strategic locations for a new settlement at Sayers Common. The SA found that the area for a new settlement was unsustainable with a number of very negative environmental and social impacts.
2. The study by GL Hearn (New Market Town Study) in 2010 was undertaken for Crawley, Mid Sussex and Horsham Councils. It highlighted that transport was a key issue noting that there were a number of 'showstoppers' including the delivery of *'appreciable junction improvements required on the A23'* and the low public transport offer. LAMBS' own transport review of January raised serious transport issues including limited public transport capacity including the rail service. GL Hearn rightly noted the importance of building in *'buy in and support for the proposal from all 3 authorities'* (para 1.16). The position is that all of the authorities oppose the MMT new settlement proposals. Para 52 of the NPPF guidance also flags the importance of the support of local communities in considering any scheme for a

new settlement. There is no such support for the MMT scheme from the local community.

3. The Brighton and Hove City Plan Part One was adopted in March 2016 following the Inspector's report that found the plan sound. The Inspector confirmed that the Council had met its duty to cooperate requirements with adjoining authorities and that it could demonstrate a five year supply of housing.
4. The Government's decision to provide a new runway at Heathrow (October 2016) focuses the expansion of airports in the south east away from Gatwick and additional housing and employment that flows from it. The possibility of a new runway at Gatwick was a matter specifically raised by the Inspector considering the Horsham Plan in his final report. The selection of Heathrow is clearly a material factor in planning for the Mid Sussex, Horsham and Crawley sub region.
5. Flood risk is an important matter for the MMT project and the problems have been set out in the report prepared by Motion in the January 2016 submissions. It is noted that a recent leaflet circulated by MMT states that *'there appears to be no concern from the Environment Agency that surface water flooding should not be managed through a SDS'* and that there are *'no other overriding constraints have been raised'*. These statements are unsubstantiated and disputed by LAMBS. MMT have carried out no assessment of the flood risk issues against a scheme and LAMBS have raised a range of significant harmful impacts including flooding, transport, landscape and ecology.

As confirmed in our previous representations, LAMBS would wish to attend the housing hearing sessions to be able to assist the Inspector in the objections they have made to the Plan and the MMT proposals in particular.

I would be grateful for your confirmation of this in due course.

Yours sincerely,



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